2 PROJECT MODIFICATIONS, UPDATED WATER SUPPLY AND GROUNDWATER DATA, AND REVISIONS TO THE DEIR

This chapter presents minor modifications to the Village at Squaw Valley Specific Plan (VSVSP) as a result of ongoing planning and design refinements since publication of the DEIR (Section 2.1). Also, this chapter summarizes the results of an update to the Water Supply Assessment (WSA) relied upon in the DEIR; the updated WSA was released in July 2015, after publication of the DEIR (Section 2.2). Finally, this chapter presents revisions to the DEIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections (Section 2.3). Changes in the text are signified by ~~strikeouts~~ where text is removed and by <u>underline</u> where text is added. The information contained within this chapter clarifies and expands on information in the DEIR and does not constitute "significant new information" requiring recirculation. (See the Master Response regarding recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

2.1 PROJECT MODIFICATIONS

This section provides a brief description and evaluation of pertinent changes to the proposed VSVSP project (also referred to as the proposed project or project), that have occurred since the release of the DEIR. Since release of the DEIR, Squaw Valley Real Estate, LLC (project applicant) has worked with Placer County's Squaw Valley Design Review Committee to improve the design features of the project so as to better meet the objectives of the Specific Plan as described in Section 3.3 of the DEIR, and to improve consistency with the vision and objectives of the *Squaw Valley General Plan and Land Use Ordinance* (SVGPLUO). There have also been minor changes to the Specific Plan project description that have been made in response to comments received on the DEIR and new information received by the applicant.

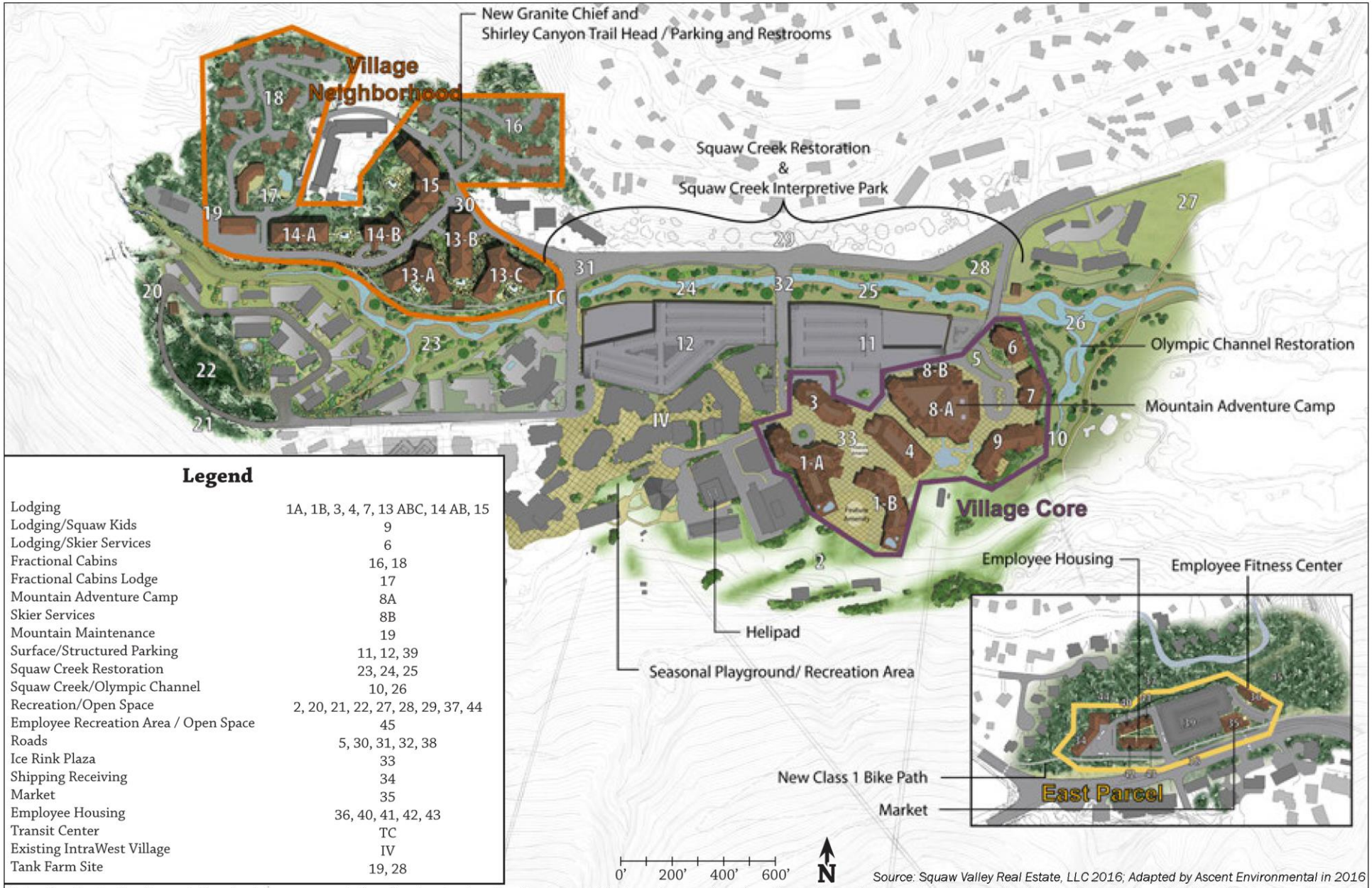
2.1.1 Description of Project Changes

Since publication of the DEIR, the project applicant has proposed several modifications to the proposed project some of which were made in response to comments on the DEIR. Many of the modifications involve changes in building designs resulting in greater space between buildings or reduced building heights. References to buildings and lots refer to the Illustrative Concept Plan (Exhibit 3-5 in the DEIR) and the Concept Plan for the East Parcel (Exhibit 3-6 in the DEIR). These DEIR exhibits have been revised and are provided below. These design changes include:

VILLAGE CORE

- Throughout the project area, maximum allowed heights of buildings would be reduced from 108 feet to a maximum of 96 feet, a 12-foot (11 percent) reduction. The only exception to this is the Mountain Adventure Camp (MAC) (building 8-A), where half of the building would remain with a maximum height of 108 feet and a large portion would be reduced to a maximum height of 84 feet. The purpose of this change is to break up a potential monolithic appearance of the MAC structure, while still maintaining its function, and to instead create a stepped appearance more consistent with project design objectives.

- The building separation throughout the Village Core has been increased to achieve a 0.8 building separation ratio (eight feet of separation between buildings for every ten feet of adjacent building height) along all passageways, and a 0.6 ratio along all paths. This is intended to give a more open feel to the Village Core.



Legend

Lodging	1A, 1B, 3, 4, 7, 13 ABC, 14 AB, 15
Lodging/Squaw Kids	9
Lodging/Skier Services	6
Fractional Cabins	16, 18
Fractional Cabins Lodge	17
Mountain Adventure Camp	8A
Skier Services	8B
Mountain Maintenance	19
Surface/Structured Parking	11, 12, 39
Squaw Creek Restoration	23, 24, 25
Squaw Creek/Olympic Channel	10, 26
Recreation/Open Space	2, 20, 21, 22, 27, 28, 29, 37, 44
Employee Recreation Area / Open Space	45
Roads	5, 30, 31, 32, 38
Ice Rink Plaza	33
Shipping Receiving	34
Market	35
Employee Housing	36, 40, 41, 42, 43
Transit Center	TC
Existing IntraWest Village	IV
Tank Farm Site	19, 28

Source: Squaw Valley Real Estate, LLC 2016; Adapted by Ascent Environmental in 2016

Note: The Illustrative Concept Plan depicts a representative site plan to show the development that could occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Illustrative Concept Plan is subject to change.

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[Revised] Exhibit 3-5

Illustrative Concept Plan

ASCENT ENVIRONMENTAL

Note: Employee housing will be located immediately adjacent to or above parking. The Concept Plan depicts a representative site plan to show the development that would occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Concept Plan is illustrative.

Source: Squaw Valley Real Estate, LLC 2015; Adapted by Ascent Environmental in 2015

X11010091 04 008

[Revised] Exhibit 3-6

Concept Plan for the East Parcel

- The plaza areas and courtyard of buildings 1-A and 1-B have been redesigned and expanded. This is intended to improve pedestrian circulation within the Village, create an enhanced plaza area, preserve scenic mountain views by increasing building separation, and provide a buffer to the vehicle noise and activity visible from the existing nearby Intrawest units.

- The plaza width and building separation at buildings 3 and 4 have been increased. These buildings have been redesigned to increase the plaza width so as to improve pedestrian circulation around these lodging units.

- The maximum allowable building height for building 6 has been reduced from 72 feet to 56 feet, a 16-foot (22 percent) reduction.

VILLAGE NEIGHBORHOOD

- Throughout the project area, maximum allowed heights of buildings would be reduced from 96 feet to a maximum of 84 feet.

- The maximum allowable building heights for buildings 13-A, 13-B, and13-C would be reduced from 96 feet to 84 feet, a 12-foot reduction. The portion of building 13-C that is closest to Squaw Valley Road would be reduced to a maximum height of 56 feet to minimize visual impacts to scenic mountain views.

- The building separation throughout the Village Neighborhood has been increased to achieve a 0.8 building separation ratio (eight feet of separation between buildings for every ten feet of adjacent building height) along all passageways, and a 0.6 ratio along all paths, excluding the fractional cabins on Lots 16 and 18. This is intended to give a more open feel to the Village Neighborhood.

- The maximum allowable building height for building 15 has been reduced from 96 feet to 84 feet, a 12-foot reduction, and a portion of the southwest wing has been reduced to a maximum height of 66 feet.

EAST PARCEL

- All structures in the East Parcel would have a maximum building height of 35 feet. Before the project modifications, the maximum allowable height of the parking structure was 20 feet, but was increased to 35 feet for the reasons described below.

- The Class I bike path originally located in the back of the employee housing structures and near Squaw Creek, has been moved to the front of the parcel along Squaw Valley Road. This is intended to remove the bike path from close proximity to the nearby residences.

- The setback from the west property line to building 34, the shipping and receiving structure, has been increased from 75 feet to 100 feet, creating additional separation between the activities at shipping and receiving and nearby residences. Vehicular circulation at the shipping and receiving structure has also been improved, creating a drive-through passage to reduce noise impacts associated with vehicles otherwise needing to backup and triggering backup “beepers”.

- The surface/structured parking (Lot 39) would be taller as a result of the project modifications. To accommodate the changes to other building locations and configurations on the East Parcel, and to reduce effects to surrounding land uses, the footprint of the parking structure was reduced. However, to maintain the same parking capacity, the structure has been changed from having one parking level above the ground surface to having two parking levels above the ground, or three levels total. To minimize the height increase associated with adding an additional level, the ground level would be placed below the existing ground surface (i.e., the foundation excavated to below existing grade) so that the structure, including any top floor barricades and architectural features, does not extend beyond 35 feet above the ground surface.

- The setback of the surface/structured parking has been increased from 25 feet from Squaw Valley Road to 35 feet. This increase can occur, in part, because of the smaller footprint of the parking structure and allows for the relocation of the Class I bike path to the space between the parking structure and Squaw Valley Road.

- The employee housing structures (buildings 40-43) have been reconfigured on the parcel to move them further from nearby residences. An 8-foot-high privacy perimeter wall has also been added along the north side of the East Parcel to reduce noise and visual impacts to nearby residences and address potential trespass issues.

- Lots 44 and 45, originally proposed to be zoned as Entrance Commercial, have been rezoned as Village-Conservation Preservation, an open space designation.

GENERAL CHANGES TO THE SPECIFIC PLAN

In addition to the design changes described above, Chapter 3, "Project Description," of the DEIR, has been modified as follows:

- In Section 3.4.3, "Public Services and Utilities," the description under Propane/Liquefied Natural Gas identified the possibility that liquefied natural gas (LNG) may become available in Olympic Valley, and may be used as an alternative or supplemental energy source. After considering the relative cost, feasibility, and practicality of bringing LNG to Olympic Valley, the applicant no longer considers this as a viable option.

- Also in Section 3.4.3, "Public Services and Utilities," the description under Propane/Liquefied Natural Gas proposed to locate all of the new propane tanks that would be required for this project on Lot 19, where propane tanks that serve the existing Village development are currently located. This has been modified to split the location of the new propane tanks between two locations. Approximately half of the new capacity would remain on Lot 19 at the west side of the Village, while the remainder of the new propane storage capacity would be located on Lot 28. Lot 19 would have fewer storage tanks and associated facilities as a result of these modifications.

  The tanks on Lot 28 would be buried and placed behind the entry monumentation that is planned for the Village at the intersection of Squaw Valley Road and Far East Road. The vaporizer station, propane bulkhead, and backup generator would be located on the surface and screened by landscaping and rock walls. A truck access way would be built on the site, allowing trucks to enter from Far East Road and exit on to Squaw Valley Road.

- Table 3-3 in the DEIR shows the Proposed Parks and Recreation Improvements that are anticipated as part of the VSVSP. Among them was new trail development intended to "improve existing and develop new trail connections between Alpine Meadows and Squaw Valley (extent and location of trail improvement/development not yet confirmed)." The applicant developed a Comprehensive Parks and Recreation Plan in October 2014 to describe the recreational facilities anticipated with the expansion of the Village at Squaw Valley. The applicant has since made changes to the Parks and Recreation Plan as a result of the comments received on the DEIR. Specifically, the Five Lakes Connection, a trail proposed to connect the Western States Trail out of Squaw Valley to the Five Lakes Trail from Alpine Meadows Road, has been removed from the plan at the request of the U.S. Forest Service (USFS), and is not considered a proposed new trail improvement.

- In Section 3.4.2, "Circulation and Parking," a new section has been added for crosswalk facilities that will be constructed on Squaw Valley Road outside of the Specific Plan area. Two crosswalks will be added to Squaw Valley Road: a west end crosswalk and an east end crosswalk. The west end crosswalk will be located in the vicinity of the intersection of Squaw Valley Road and Christy Hill Road. The east end crosswalk will be located in one of three potential locations: on the westerly side of the Winding Creek

Road and Squaw Valley Road intersection, just west of the Squaw Valley Academy driveway on Squaw Valley Road, or just west of the Tavern Inn driveway on Squaw Valley Road.

Standard crosswalk striping and crosswalk signage will be installed at both locations. In addition, Rapid Rectangular Flashing Beacons (RRFB) will be installed in each direction of travel. A RRFB consists of a push button on both sides of the roadway that, when activated by the pedestrian, triggers flashing lights on both sides of the roadway to warn approaching automobiles to slow for crossing pedestrians. The beacons are solar powered and equipped with wi-fi technology so that no power or cabling is needed. These facilities are further described in the Infrastructure Phasing Plan that will be considered concurrent with the adoption of the VSVSP, and the final location of these facilities will be determined during review of the project during which the improvements are triggered.

2.1.2 Evaluation of the Project Modifications

LAND USE AND FOREST RESOURCES

The project modifications that have been proposed by the applicant since the DEIR was released do not change the proposed maximum density or types of land uses that were analyzed in the proposed action for the DEIR. The proposed changes to the Placer County General Plan, Placer County Zoning Ordinances, and the SVGPLUO remain the same as those that were proposed in the VSVSP. The analysis of impacts of those changes in the DEIR remains unchanged, concluding that the impact would be less than significant.

The project modifications that have been made include the location of new propane storage facilities on Lot 28 in addition to the existing propane tanks on Lot 19. Lot 19, the Mountain Maintenance Yard, is already zoned for heavy commercial uses (V-HC) such as the propane storage tanks and maintenance facilities. Lot 28 is proposed by the project to be zoned for forest recreation (V-FR), an open space designation. As proposed in the April 2015 Specific Plan, propane storage facilities would not be an allowed use on Lot 28. However, the zoning designation for Lot 28 has been modified to include an overlay zone such that propane storage would be a permissible use on Lot 28 if the VSVSP is approved. Propane storage would not be an allowed use on other lots within the VSVSP proposed to be zoned forest recreation.

None of these changes would alter the DEIR's conclusions regarding impacts associated with division of an established community, conflict with land use plans or policies adopted for avoiding or mitigating and environmental effect, development of incompatible uses, alteration of planned uses, or economic or social changes leading to environmental changes, all of which were found to be less than significant.

The analysis of forest resources that would be affected by the project has also remained essentially unchanged. Removal of consideration of the Five Lakes Connector trail as part of the Proposed Parks and Recreation Improvements may reduce forest impacts by the small number of trees that would have been removed as part of constructing that trail. The conclusion in the DEIR that impacts to forest resources would be less than significant remains unchanged.

POPULATION, EMPLOYMENT, AND HOUSING

The proposed modifications to the Specific Plan do not change the maximum number of new residential units or bedrooms, or the densities of the new development. Population increase estimates, both permanent and seasonal, do not change. The total population of the Valley would remain at 9,483, well below the 11,000 to 12,000 peak overnight population planned for in the SVGPLUO. The conclusions reached in the DEIR that impacts from population growth and increases in housing demand would be less than significant remain with the proposed project modifications.

No changes to the number of employee housing units have been proposed in the modifications to the East Parcel. Conclusions and required mitigation measures do not change with the proposed modifications.

BIOLOGICAL RESOURCES

The proposed modifications to the project may slightly reduce the potential impacts to biological resources by moving the bike trail away from Squaw Creek on the East Parcel, and by removing the Five Lakes Connector trail from consideration as part of the Proposed Parks and Recreation Improvements due to potential risks to Sierra Nevada yellow-legged frog habitat. Overall, this would be a slight improvement related to biological resources, and the effects described in the DEIR would remain essentially unchanged. Also, see the Master Response regarding water supply for a discussion of the effects of groundwater pumping on biological resources and creek restoration benefits.

The proposed changes to the propane storage site locations would not significantly change the conclusions in the DEIR for biological resources. Locating additional storage on Lot 19 was analyzed for potential impacts from leaks or spills due to its proximity to Squaw Creek in the Hazards section of the DEIR, and it was determined that sufficient regulatory control was in place to reduce the risk of such an event to be less than significant. Similarly, Lot 28 is proximate to Squaw Creek, and the same conclusions can be made.

Appendix E1 of the DEIR shows the habitat impact assumptions that were made for each lot in the VSVSP. The assumption for Lot 19, where all the propane storage tanks were to be located for the proposed project, was that habitat would be 100 percent removed. With the proposed modifications, approximately half of the propane storage capacity would be transferred to Lot 28. In the DEIR, Lot 28 was already assumed to be 100 percent affected by the project. It is a gravel surface at the present time, and the applicant intends to use Lot 28 for entry monumentation and arrival information. The lot would also be graded. The addition of a buried propane storage tank, a vaporizer station, a back-up generator and an access way for propane trucks, would not change project effects related to habitat disturbance.

CULTURAL RESOURCES

The DEIR identifies significant impacts that would occur with the removal of historic buildings associated with the 1960 Olympics. Mitigation measures have been identified to document and interpret these structures prior to their removal, though the impact would remain significant and unavoidable because the buildings would be removed and would no longer exist. Additional mitigation measures are also included to reduce potentially significant impacts to known and currently undiscovered archaeological resources because actions would be taken to avoid, move, record, or otherwise treat the resource appropriately, in accordance with pertinent laws and regulations. By providing an opportunity to avoid disturbance, disruption, or destruction of archaeological resources, the impacts would be reduced to a less-than-significant level. The proposed modifications to the project do not change the overall project footprint, effects on known cultural resources, the potential to discover and affect currently unknown cultural resources, or conclusions of the DEIR impact analysis or the need to implement the mitigation measures.

VISUAL RESOURCES

The DEIR identifies a number of significant, potentially significant, and significant and unavoidable impacts to visual resources. Mitigation Measure 8-2 in the DEIR requires the project applicant to obtain Design Review approval from the Placer County Design/Site Review Committee prior to submittal of Improvement Plans or Building Permits. In addition, all project phases must be compatible with the Plan Area Development Standards prescribed in Appendix B of the VSVSP. Since release of the DEIR, the project applicant has worked with Placer County's Squaw Valley Design Review Committee to improve the design features of the project so as to better meet the objectives of the Specific Plan, and to improve consistency with the vision and objectives of the SVGPLUO.

Most of the modifications to the project that have been proposed by the applicant are a result of the recommendations of the Design Review Committee. The reduced building heights, broader passageways, and increased setbacks of structures are all intended to help reduce the overall visual impacts to residents and visitors. This, together with compliance with the Placer County Development Standards and Design

Guidelines, would serve to further reduce the potential visual impacts of the project. However, the significant impacts associated with adverse effects on views from view blockage of the lower slopes of the background mountains, while slightly reduced, would continue to be significant to those who frequently visit or live in the valley; the changes in the viewshed would remain substantial because view blockage would occur, even if less than with the project evaluated in the DEIR, and because the long-term trend of development of the valley would continue.

The reduced heights and wider passageways in the proposed modifications would also reduce the shadowing effects of structures in the project area, which is already a less-than-significant impact.

The project modifications to the East Parcel include landscaping on the north and west sides to screen night lighting from adjacent residential parcels. This will bring the project into compliance with Mitigation Measure 8-5a as recommended in the DEIR. With this mitigation measure, lighting or glare generated by the project would have a less-than-significant impact on the day and nighttime views of the East Parcel.

The modifications to the project also include the anticipated placement of propane storage facilities on Lot 28. The propane tanks themselves will be below ground, and associated facilities that are above ground will be screened by landscaping vegetation and rock walls consistent with Placer County Development Standards and Design Guidelines. Additional scenic screening may be recommended at the project approval stage to accommodate site-specific needs for these two sites. Because of the proposed screening, this modification would not alter the overall significance of impacts to visual resources associated with the project.

TRANSPORTATION AND CIRCULATION

The proposed modifications to the Specific Plan would not change the maximum number of new residential units or bedrooms or square footage of restaurant, retail, and other uses. Therefore, traffic generation as described in the DEIR would not change. The project modifications include minor changes to the pedestrian and vehicular circulation pattern in the Village Core. The plaza areas and courtyard of buildings 1-A and 1-B have been redesigned and expanded, and the plaza width and building separation at buildings 3 and 4 have been increased. Pedestrian passageways have also been widened. The bike trail that passes through the East parcel has been moved within the parcel, but capacity and access to the bike trail has not changed. Vehicular circulation at the shipping and receiving structure on the East Parcel has also been improved, creating a drive-through passage rather than a back-in and out pattern. These changes would make modest improvements to the circulation patterns in the project area, but the impacts and mitigation needs described for the project in the DEIR remain essentially unchanged. Access ways for propane trucks to Lot 28 as part of the modifications related to the propane storage facility would not significantly affect transportation or circulation patterns in the project area. Finally, new crosswalk facilities on Squaw Valley Road outside of the Specific Plan area would improve pedestrian circulation patterns and enhance public safety in these areas.

AIR QUALITY

The proposed modifications to the Specific Plan would not change the maximum number of new residential units or bedrooms or square footage of restaurant, retail, and other uses. Therefore, factors associated with stationary and mobile source emissions would not appreciably change. The circulation improvements in the Village Core and the drive-through passage at the shipping and receiving structure on the East Parcel would reduce idling of vehicles and therefore slightly reduce air emissions. The air quality impacts and need for and effectiveness of the mitigation measures remain essentially unchanged with the project modifications.

NOISE

The proposed modifications to the Specific Plan would not change the proposed project land uses, maximum number of new residential units or bedrooms, or square footage of restaurant, retail, and other uses. Therefore, factors associated with noise generation (e.g., construction, vehicle traffic) would not appreciably change. Vehicular circulation at the shipping and receiving structure on the East Parcel has been improved,

creating a drive-through passage to reduce noise impacts associated with vehicles otherwise needing to backup and trigger backup alarms. An 8-foot-high privacy perimeter wall has also been added along the north side of the East Parcel and buffers between East Parcel facilities and nearby residences have been increased. These actions would reduce noise impacts associated with the East Parcel; however, the noise impacts and mitigation needs identified for the project as a whole in the DEIR remain essentially the same.

SOILS, GEOLOGY, AND SEISMICITY

Because the overall footprint, land use, and density of the project would not change with the project modifications, the development would be subject to the same seismic, liquefaction, and avalanche constraints as the proposed project in the DEIR. As with the proposed project, the preparation of a Final Fault Evaluation Report and a site-specific geotechnical engineering report that would be approved by the Placer County Engineering and Surveying Division, will provide final design guidance for building layouts, foundation engineering, and structural standards that will be consistent with and adequate for the actual seismic and soils hazards of the project site. Similarly, the applicant will prepare and implement an Avalanche Hazard Mitigation Plan for proposed structures within known Potential Avalanche Hazard Areas. Overall, soils, geology and seismicity impacts and the need for mitigation measures are the same as for the proposed project as evaluated in the DEIR.

HYDROLOGY AND WATER QUALITY

The project modifications would reduce the footprint of impervious surfaces on the East Parcel, thereby slightly increasing groundwater recharge, and slightly reducing potential water quality impacts to Squaw Creek with reduced surface runoff. The footprint of the parking garage is smaller, the bike trail that was on the Squaw Creek side of the development on the East Parcel has been moved to the Squaw Valley Road side, and Lot 44 has been designated as open space. These changes are minor in the scope of the overall project, however.

The project modifications include adding a new site for a propane storage facility on Lot 28. This will add impervious surfaces to the site, but reduce the amount of additional development originally proposed for Lot 19 in the Specific Plan. The total amount of impervious surfaces that may affect groundwater recharge and surface runoff will be generally offset with the new modifications, and the changes are minor in the scope of the overall project. The proposed modifications would not alter the effects identified for hydrology and water quality in the DEIR.

PUBLIC SERVICES AND UTILITIES

The project modifications would not change the total number of units, rooms or capacity of the proposed project, so estimates of increased demand for drinking water supply, wastewater and solid waste disposal, energy use, schools, parks, snow removal, police, fire protection and emergency medical services, do not change from those described in the DEIR. The modifications made to eliminate the option of using LNG as a supplement or alternative to propane for the project will not alter the conclusions of the DEIR, because both options were evaluated. Conclusions in the DEIR related to public services and utilities are not altered by the proposed project modifications.

HAZARDOUS MATERIALS AND HAZARDS

The project modifications would not change the potential for hazardous materials to be found in the project area or the potential for exposure to hazards. The modifications made to the propane distribution system will be subject to the pipeline safety regulations of the California Public Utility System. The proposed modification to transport and delivery of propane to two site locations rather than one is also subject to regulatory oversight by the state and federal government. No additional hazardous impacts are anticipated from this change to the proposed project. Lot 28, which has been proposed as a possible propane storage site is similar in characteristics, including proximity to Squaw Creek, to Lot 19, which was originally proposed as the

only propane storage location. The effects and mitigation measures related to hazardous materials and hazards would remain essentially unchanged with the proposed modifications from those described in the DEIR.

GREENHOUSE GASES AND CLIMATE CHANGE

The project modifications would not affect greenhouse gas (GHG) emissions. Improvements to vehicle circulation in the Village Core and the East Parcel will reduce the amount of time vehicles are idling, thereby slightly reducing emissions, but the improvement is not meaningful in terms of overall GHG emissions.

Climate change has the potential to increase risk from wildfires in the area, but none of the project changes would result in changes associated with the risks described in the DEIR.

2.1.3 Conclusion

CEQA requires recirculation of an EIR when significant new information is added to the EIR after public notice is given of the availability of the DEIR for public review, but before certification (CCR Section 15088.5). New information is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (CCR Section 15088.5).

The DEIR provided a comprehensive analysis of potential impacts of the project and alternatives. The modifications that have been made to the project include minor changes to the Illustrative Concept Plan and to the Project Description of the Specific Plan. The changes that have been made by the applicant would not generate a new substantial adverse environmental effect and in some cases, the changes reduce potential environmental effects of the project. The significance of impacts would not change. The modifications are also within the scope of the alternatives analyzed in the DEIR. Because the information in this section makes insignificant modifications to an otherwise adequate EIR, recirculation of the DEIR for additional comment is not required, pursuant to Section 15088.5 of the State CEQA Guidelines.

Because this FEIR did not result in the identification of any new significant environmental impacts or a substantial increase in the severity of an environmental impact, this FEIR does not contain "significant new information," and recirculation of the DEIR is not required prior to approval. (See also the Master Response regarding recirculation).

2.2 UPDATED WATER SUPPLY ASSESSMENT AND GROUNDWATER DATA

Several sections of the DEIR relied upon the WSA that was prepared by Placer County in partnership with the Squaw Valley Public Services District (SVPSD), the entity proposed to provide water service to the project. The WSA was completed in July 2014. Sections of the biological resource impact analysis (DEIR Chapter 6), hydrology impact analysis (DEIR Chapter 13), and the water supply impact analysis (DEIR Chapter 14) relied on the results of the WSA. Extensive modeling based on years of groundwater data and calibrations was conducted by the SVPSD in preparing the WSA. Groundwater data spanned the period of May 1992 through December 2011. Although completed in 2014, data from the 2012 through 2014 period was not available at the time the analysis used to prepare the WSA was conducted. The WSA concluded that groundwater was sufficient to serve the project during normal, dry, and multiple dry year conditions under full buildout project conditions with cumulative development conservatively expected over the next 25 years, satisfying the requirements for a WSA as expressed both under the CEQA Guidelines (Section 15155) and the California Water Code (Sections 10910-10915).

Subsequent to release of the 2014 WSA and the DEIR, Olympic Valley groundwater data for the years 2012 through December 2014 became available. This timeframe covers a significant drought period. A number of

comments on the DEIR focused on this period of drought, and raised the issue of whether the Olympic Valley Groundwater Basin had sufficient supply under these drought conditions to serve the project and cumulative development over the next 25 years. This combination of factors resulted in an update to the 2014 WSA, which was released in July 2015.

The 2015 WSA Update (available in Appendix A of this FEIR) added the drought data from 2012 through December 2014 into the groundwater model. It was also updated to add additional demand data including the potential for irrigation if needed for Squaw Creek vegetation restoration. Demand data also assumed a slightly higher occupancy rate, resulting in slightly higher demand. Finally, an additional analysis (subsequent to the 2015 WSA) evaluated both a six and nine new well wellfield configuration. The reasoning for, and results of the study of the different wellfield scenarios are provided in the Master Response regarding water supply (see Section 3.1, "Master Responses," in this FEIR). The 2015 WSA concluded that the Olympic Valley Groundwater Basin met the criteria for sufficient supply under the project build-out plus 25 years of cumulative development scenario.

The added data and water demand scenarios evaluated for the 2015 WSA Update were also used to support further detailed groundwater modelling (available in Appendix B of this FEIR). The impact analysis in Chapters 6 and 13 of the DEIR were supported by detailed groundwater modelling beyond the WSA to assess potential impact mechanisms such as whether any declines in groundwater elevations could adversely affect surface water conditions and vegetation in Squaw Creek. The detailed groundwater modelling was repeated using the added data and water demand scenarios to assess whether there would be any changes in effects from those identified in the DEIR.

Additional details regarding the development of the 2015 WSA Update and updated groundwater modeling, and the results of these analyses are provided in Chapter 3 of this FEIR, in the Master Response regarding water supply.

2.3 REVISIONS TO THE DEIR

This section presents specific text changes made to the DEIR since its publication and public review. The changes are presented in the order in which they appear in the original DEIR and are identified by the DEIR page number. Text deletions are shown in ~~strikethrough~~, and text additions are shown in <u>underline</u>.

It should be noted that the following revisions do not change the intent or content of the analysis or effectiveness of mitigation measures presented in the DEIR.

2.3.1 Revisions to Chapter 1, "Introduction"

None

2.3.2 Revisions to Chapter 2, "Executive Summary"

Due to a changed and improved condition since publication of the DEIR and the addition of a new mitigation measure, Impacts 9-3, 11-5, and 18-32, on pages 2-4 and 2-5 of the DEIR are no longer significant and unavoidable impacts. Therefore, as shown below, they have been removed from the list in Section 2.2.1, "Significant and Unavoidable Environmental Impacts."

Transportation and Circulation

- ~~Impact 9-3: Impacts to Caltrans intersections~~

Noise

- ~~Impact 11-5: Exposure of new and existing sensitive receptors to operational project-generated transportation noise sources (potentially significant for existing sensitive receptors)~~

Cumulative Impacts

- ~~Impact 18-32: Cumulative long-term ambient noise levels~~

In response to comment O8a-26, a portion of Mitigation Measure 6-1a found in the second bullet in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-16 of the DEIR is revised as follows:

		◤ An annual monitoring report for a minimum period of 5 years from the date of installation, prepared by the above-cited professional, shall be submitted to the Planning Services Division for review and approval. Any corrective action shall be the responsibility of the applicant. <u>The report shall include baseline (pre-restoration) and post-restoration measurements of suspended sediment concentration, streamflow, and turbidity as described on page 27 of the Channel Restoration Design Basis Report (Balance Hydrologics 2014).</u>	

In response to comment O9-83, Mitigation Measure 6-1a (text inserted in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-16 of the DEIR) is revised as follows to elaborate on the content of the Mitigation and Monitoring Implementation Plan with respect to mitigating effects to waters of the U.S. and other wetlands:

		◤ It is the project applicant's responsibility to ensure compliance with the MMIP. Violation of any components of the approved MMIP may result in enforcement activities per Placer County Environmental Review Ordinance, Section 18.28.080. If a monitoring report is not submitted for any one year, or combination of years, as outlined in these conditions, the County has the option of utilizing these funds and hiring a consultant to implement the MMIP. Failure to submit annual monitoring reports could also result in forfeiture of a portion of, or all of, the deposit. An agreement between the applicant and County shall be prepared which meets DRC approval that allows the County use of this deposit to assure performance of the MMIP in the event the project applicant fails to perform. ◢ <u>The Mitigation and Monitoring Implementation Plan shall, at a minimum, include the following specific criteria, standards, and information:</u> ◤ <u>Baseline locations of jurisdictional habitat including species along the western and upper eastern channel of Squaw Creek (West Cells E through J and East Cells A through D) within the plan area shall be documented before initiation of construction of the VSVSP. Conduct vegetation monitoring or additional groundwater modelling as described in Mitigation Measure 6-1c below. Any jurisdictional habitat lost within the western portion of Squaw Creek from</u>	

		groundwater drawdown that affects streambank instability shall be replaced with native vegetation (riparian preferably) that will stabilize the streambank and prevent sediment mobilization. ◤ identification of compensatory mitigation sites and criteria for selecting these mitigation sites onsite and offsite; ◤ in kind reference habitats within the Tahoe-Truckee region for comparison with compensatory wetlands habitats (using performance and success criteria) to document success; ◤ monitoring protocol, including schedule and annual report requirements (compensatory habitat shall be monitored for a minimum of five years from completion of mitigation or last human intervention [including recontouring and grading and irrigation], or until the success criteria identified in the approved mitigation plan have been met, whichever is longer); ◤ ecological performance standards, based on the best available science and including specifications for native wetland and riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, indicators of stress that might result in mortality, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted wetland species by the end of the five-year maintenance and monitoring period or dead and dying species shall be replaced and monitoring continued until 80 percent survivorship is achieved; ◤ corrective measures if performance standards are not met; ◤ responsible parties for monitoring and preparing reports; and ◤ responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions. ◢ The project applicant shall follow requirements outlined in the MMIP and Compensatory Stream and Riparian Mitigation and Monitoring Plan (CSRMMP) for vegetation restoration success in all areas of onsite and off-site mitigation or restoration.	

In response to comment O8b-36 and to further clarify the mitigation to ensure that compensation will occur in the Sierra Nevada and that there is no net loss of wetlands in the Sierra Nevada ecosystem, the following bullet is added to Mitigation Measure 6-1a in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-17 of the DEIR:

		◢ Any offsite wetlands mitigation will occur in the Sierra Nevada bioregion and within the Tahoe-Truckee area to ensure that there is a no net loss of wetland, riparian, or wet meadow habitat within the Sierra Nevada or Tahoe-Truckee regions. ◢ Provide a combination of mitigation bank credit	

		purchase and off-site construction as outlined above.	

In response to comment O8b-36 and to ensure all sensitive riparian and wetland habitats (including non-jurisdictional wetland habitats) are mitigated within the region, Mitigation Measure 6-1b (in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-18 of the DEIR) is revised as follows:

		◢ The project applicant shall compensate for net permanent riparian habitat impacts at a minimum of a 1:1 ratio through contributions to a CDFW approved wetland mitigation bank <u>in the Sierra Nevada and the Tahoe-Truckee regions</u> or through the development and implementation of a Compensatory Stream and Riparian Mitigation and Monitoring Plan (CSRMMP) and a County approved MMIP aimed at creating or restoring in-kind habitat within the plan area and/or in the surrounding area. Stream and riparian habitat compensation, which could be provided entirely or in part by the planned Squaw Creek restoration, shall include establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the existing riparian corridor along streams in the project site initially and then in surrounding areas. Construction activities and compensatory mitigation shall be conducted in accordance with the terms of a streambed alteration agreement as required under Section 1602 of the Fish and Game Code.	

In response to comment O8b-37, Mitigation Measure 6-1b (in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-19 of the DEIR) is revised as follows to ensure riparian mitigation success:

		◢ ecological performance standards, based on the best available science and including specifications for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, <u>indicators of tree stress that might result in mortality,</u> and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted riparian trees and shrubs by the end of the five-year maintenance and monitoring period or dead and dying trees shall be replaced and monitoring continued until 80 percent survivorship is achieved;	

In response to multiple comments (08b-7, 08b-15, 08b-16, 08b-17, 08b-28, 08b-35, 08b-36, 08b-38, 09-61, 09-110, PH-47, etc.), Mitigation Measure 6-1c in Table 2-2, "Summary of Impact and Mitigation Measures," on pages 2-19 and 2-20 of the DEIR is revised as follows:

		Mitigation Measure 6-1c: Implement Mitigation Measure 13-4 and monitor and respond to groundwater effects. The project applicant shall implement Mitigation Measure 13-4, provided in Chapter 13, "Hydrology and Water Quality." Mitigation Measure 13-4 reduces the uncertainty associated with management of well system design and operation by ensuring the adoption of performance standards, thresholds, and recommendations from the WSA for well system operation, and requiring consistency with applicable groundwater plans. By confirming that groundwater management is implemented in a manner that is consistent with the operational parameters described in the WSA, Mitigation Measure 13-4 would also result in confirmation that groundwater pumping ~~does not result in losses of riparian vegetation in the west channel or upper east channel of Squaw Creek~~ and any future groundwater/vegetation impact modeling is consistent. In addition, the project applicant shall record baseline locations and composition of species of riparian and meadow vegetation ~~along the~~ in the surrounding meadow that is hydrologically connected to the upper eastern channel of Squaw Creek (in relation to East Cells A through ~~E~~D) and along the western channel (in relation to West Cells E through J) before initiation of construction of the VSVSP. If sensitive plant species are found in these areas, the project proponent will follow mitigation measures outlined in Mitigation Measure 6-8 to consult with CDFW and USFWS, as appropriate depending on species status, to determine the appropriate mitigation measures for the indirect impacts that could occur as a result of project operational groundwater drawdown. ~~Where these locations are on lands not controlled by the applicant, the applicant shall seek access from the landowner to conduct monitoring. If access cannot be obtained, monitoring will be conducted via photo points or other means from the property line or other nearby publicly accessible location.~~ The extent and composition of this vegetation in the western channel and associated riparian and wet meadow areas shall be monitored annually until at least 5 years ~~final project build out~~ after the last project element is occupied, to ensure accurate recordation of responses to groundwater level declines and any beneficial effects resulting from creek restoration. Any riparian or meadow habitat lost or degraded within these areas that is determined to be a result of project-related groundwater level declines shall be compensated for on or off-site (within the Olympic Valley preferred) at a minimum 1:1 ratio within the Sierra Nevada bioregion and the Tahoe-Truckee region, or conditions otherwise corrected, such as through irrigation of riparian ~~vegetation~~ and/or wet meadow vegetation to maintain composition and functionality of existing habitat. If monitoring shows that riparian vegetation along the streambank is not supported, other native vegetation will be planted and managed to stabilize the creek bank as per Mitigation Measure 6-1b. ~~Alternatively, groundwater modeling can be conducted that~~	

		~~predicts conditions for riparian vegetation and meadows at a higher elevation than the Squaw Creek low flow channel (current groundwater analysis only supports an evaluation of conditions at the elevation of the low flow channel). If this modeling indicates that changes in groundwater conditions under the proposed groundwater management regime would not result in a significant adverse effect to riparian and meadow habitat, ongoing monitoring would not be needed.~~ In order to address the potential effects of groundwater pumping outside of the VSVSP area, the following steps shall be taken: (a) Prior to recordation of the first Small Lot Tentative Map, conduct soil borings throughout the wet meadow east of the project boundary (see Exhibit MM 6-1c) to determine whether groundwater is available to wet meadow vegetation (i.e., there are no barriers to between groundwater and plant roots and/or moisture levels in the soil column indicate that groundwater is available to plant roots). Soil borings may be taken in multiple months and in successive seasons as needed to determine if a connection to groundwater is present. If groundwater is not available to the plants during the July-October period, then no further steps are necessary with respect to those areas. In these conditions, it is assumed that vegetation is receiving water from sources other than groundwater, such as golf course irrigation overspray. (b) If soil borings indicate that groundwater is available to these plants in some or all portions of the study area east of the project boundary during July through October, then it is assumed that drops in groundwater levels could affect the viability of the plants and a monitoring plan shall be implemented, and shall include the following steps. ◢ Determine the minimum depth to groundwater needed during the critical period for existing habitat to maintain baseline conditions. ◢ Install groundwater monitoring wells in the riparian and wet meadow portions of the study area east of the project boundary where a potential connection to groundwater has been established. The location of the wells shall be based on the extent of the area that could be affected, based on part on as indicated by the data collected by soil borings conducted as part of Item (a)#1, and for which access is available. For example, if the entire wet meadow in the study area east of the project boundary is included, it is anticipated that 8 to 12 wells will need to be installed, including at least one well east of the study area. Existing and planned monitoring wells may be used, if appropriate, and permission is provided by the well operator/owner. Well locations shall be coordinated with plant survey transects. ◢ Collect data from the monitoring wells each year from July through October, at a minimum. ◢ Establish transects on a north-south heading every 50 meters or less. ◢ Determine the species that are located on each transect at one-meter intervals.	

- Surveys shall be conducted at least once annually to determine whether the vegetation profile is changing along the transect and/or there is increased plant mortality.

Initial monitoring [as outlined in (b)] to establish baseline conditions of wet meadow vegetation and groundwater levels east of the VSVSP area shall be conducted annually for 5 years. The onset of monitoring may be coordinated with creek restoration efforts, but shall begin prior to or concurrent with recordation of the first Small Lot Tentative Map or within 2 years of project approval, whichever occurs first. After the initial 5 years, monitoring shall be conducted every 5 years, at a minimum, until 30 percent of VSVSP development has been completed. Upon occupancy of 30 percent of the VSVSP development, monitoring shall be conducted on an annual basis until 5 years after buildout of the project.

If access cannot be gained to survey the riparian habitat and/or wet meadow and/or to install monitoring wells east of the VSVSP area, then an assessment shall be made via photo-points or other means from the property line or other nearby publicly accessible location and/or surveys of a control site with similar characteristics that is located on property that can be accessed. In order to determine whether observed changes are due to groundwater pumping, modeling methods may be used. If adverse effects are observed and can be attributed to groundwater pumping, then mitigation would be required as described below.

If monitoring and surveys indicate that riparian and/or wet meadow vegetation is being lost and/or degraded at levels that could impair the viability and value of the wet meadow and/or riparian habitat, and that change is correlated with lowered groundwater levels as indicated by monitoring wells and pumping data, one or more of the following steps shall be undertaken to ensure that there is no net loss of acreage and/or value of wet meadow habitat:

- Work with the SVPSD to adjust the pumping regime in a manner that minimizes draw down in the portion of the overall study area that is being affected;
- Irrigate the affected area during the critical period using water from a source other than the aquifer, such as fractured wells used for snowmaking at Squaw Valley;
- Provide improvements to the water system in Squaw Valley (e.g., replacement of old, leaking pipelines, replacement of high-water use fixtures) to reduce demand from other sources by an amount commensurate with the amount of irrigation water required for riparian and/or meadow vegetation. In this case, water from the aquifer could be used for irrigation of sensitive habitats; and/or
- Provide compensation for the affected area by restoring a commensurate area that is degraded toof wet meadow and/or riparian habitat conditions outside of the study area. Preference shall be given to areas within the Squaw Valley meadow and/or in the vicinity of Squaw Creek. Contribution to the restoration efforts for Squaw Creek east of the VSVSP would be one method of

		compensation, because the creek restoration would improve the function of the creek, and thereby improve habitat conditions along the creek and within the meadow. If suitable land is unavailable within the Squaw Valley meadow and/or in the vicinity of Squaw Creek, then restoration activities may occur outside of Squaw Valley but within the Tahoe-Truckee area. VSVSP would be responsible for restoring that portion which is attributable to its share of increased groundwater pumping. Such compensation shall ensure that there is no net loss in the quantity or function of such habitat. The selection of the remediation measures shall be based in part on whether the effects on riparian and/or meadow vegetation are occurring only during certain years (e.g., particularly dry years) and the period of time that remediation would be needed to ensure vegetation viability. If irrigation is used, it shall be demonstrated that the amount of water used would be within the water demand evaluated in the 2015 Water Supply Assessment or that another source of water, such as snow making wells or reducing other demand, as discussed above, could be used. As discussed previously, water could be supplied from snow-making wells located within fractured bedrock (i.e. not drawing water from the Olympic Valley aquifer) to provide irrigation for landscaping, the creek restoration area, and riparian vegetation along East Cells A through C.	

In response to comment O9-61 and to clarify that potential groundwater impacts are included in the required consultation, Mitigation Measure 6-8 (the first bullet in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-31 of the DEIR) is revised as follows with respect to special-status plants:

		◢ If special-status plant species are found that cannot be avoided during construction or because of operational groundwater drawdown, the project applicant shall consult with CDFW and/or USFWS, as appropriate depending on species status, to determine the appropriate mitigation measures for direct and indirect impacts that could occur as a result of project construction and will implement the agreed-upon mitigation measures to achieve no net loss of occupied habitat or individuals. Mitigation measures may include preserving and enhancing existing populations, creation of off-site populations on project mitigation sites through seed collection or transplantation, and/or restoring or creating suitable habitat in sufficient quantities to achieve no net loss of occupied habitat and/or individuals. Potential mitigation sites could include suitable locations within or outside of the project area. A mitigation and monitoring plan will be developed describing how unavoidable losses of special-status plants will be compensated.	

In response to comment F2-2, Mitigation Measure 6-10 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-38 of the DEIR is revised as follows:

Impact 6-10: Effects of additional trail construction and improvements identified in the Specific Plan. To meet County requirements for provision of recreational facilities, existing trails could be improved, and new trails could be developed, outside the currently defined project site. Depending on the specific locations of these trails and the types and magnitude of their effects on biological resources, this impact would be potentially significant.	PS	**Mitigation Measure 6-10: Implement previous applicable mitigation measures during trail development.** Once a proposed alignment and the location of specific improvements are identified, a~~A~~ qualified biologist shall survey the new trail route~~s~~ and segments of existing trails identified for improvements outside the project boundary identified in this EIR to determine the biological resources present and the impacts identified within this chapter that could occur. Based on the results of this site review, the biologist shall identify mitigation measures within this chapter applicable to the specific trail route segments and the mitigation measures shall be implemented as appropriate during trail construction/improvement.	LTS

In response to comment I95-1, Mitigation Measure 7-3b in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-42 of the DEIR is revised as follows:

		Mitigation Measure 7-3b: Develop and implement a Worker Environmental Awareness Program. The project applicant shall design and implement a Worker Environmental Awareness Program (WEAP) that will be provided to all construction personnel and supervisors who will have the potential to encounter and alter heritage and cultural resources. The topics to be addressed in the WEAP will include, at a minimum: ◢ types of heritage and cultural resources expected in the project area; ◢ types of evidence that indicates heritage or cultural resources might be present (e.g., ceramic shards, trash scatters, lithic scatters, mineralized, partially mineralized, or unmineralized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints); ◢ what to do if a worker encounters a possible resource; ◢ what to do if a worker encounters bones or possible bones; and ◢ penalties for removing or intentionally disturbing heritage and cultural resources, such as those identified in the Archeological Resources Protection Act (ARPA).	

Due to a changed and improved condition since publication of the DEIR, Impact 9-3 and Mitigation Measure 9-3 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-51 of the DEIR are revised as follows:

Impact 9-3: Impacts to Caltrans intersections. The proposed project would exacerbate unacceptable operations at the SR 89/Alpine Meadows Road intersection during all three analysis peak hours. This	~~S~~LTS	~~**Mitigation Measure 9-3: Construct the planned traffic signal at the SR 89/Alpine Meadows intersection.** Placer County has been working with Caltrans to construct a traffic signal at this intersection. Squaw Valley does not~~	~~w/signal:~~ LTS ~~w/o signal: SU~~

would be a significant impact. Since publication of the DEIR, the planned traffic signal at the SR 89/Alpine Meadows intersection has been constructed and is operational. Therefore, the project would not generate sufficient vehicle trips to generate an increase in intersection delay of more than 2.5 seconds, and this impact would be less than significant.		~~have a role in construction of this traffic signal. Although the precise timing of the signal's installation is not known at this time, the plans and specifications have been approved by the Placer County Board of Supervisors and the contract for construction has been awarded as of April 2015. It is anticipated to be constructed by the County and Caltrans in 2015 and be completed in one construction season. Once this traffic signal is in place, operations would improve to an acceptable LOS D or better during all three analysis periods, and no mitigation would be required of the project.~~ No mitigation is required.	

In response to comment O13-1 and as revised by the County Department of Public Works, the title and text of Mitigation Measure 9-7 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-52 of the DEIR is revised as follows:

Impact 9-7: Impacts to transit. The proposed Specific Plan describes several planned transit service expansions, some of which are listed as policies in the Specific Plan. However, the policies and service expansions do not explicitly require that the project applicant ensure that an adequate supply of public transit service be available to meet the anticipated demand. This would be a significant impact.	S	**Mitigation Measure 9-7a: Contribute fair share or create a Community Service Area (CSA) or a Community Facilities District (CFD) to cover increased transit service.** The project applicant shall commit to providing fair share funding to ~~TART or forming~~ the Department of Public Works and Facilities (DPW&F) or create a Community Service Area (CSA) or a Community Facilities District (CFD) to fund the costs of increased transit services ~~prior to the recordation of the Initial Large Lot Final Map~~. ~~The provisions for monitoring (discussed below), and determining the appropriate fair share or the steps for forming a CSA or CFD shall be determined at this time in consultation with, and to the satisfaction of TART and County staff.~~ An Engineer's Report shall be complete prior to recordation of any Small Lot Final Map to the satisfaction of DPW&F to define the fair share or used for the creation of the CSA or CFD. If and when a CSA or CFD is formed, the project applicant shall no longer be responsible for making fair share payments to DPW&F for the increased transit service for the portion of the project covered by the CSA or CFD. ~~Prior to recordation of the Initial Small Lot Final Map, the project applicant shall work with TART to conduct winter and summer season monitoring of ridership on bus routes to/from, and within Olympic Valley. Written evidence of this monitoring, its results, and any comments from TART shall be provided to Placer County ESD and DPW. When ridership approaches capacity, and based on the previously agreed upon provisions, the project applicant shall make a fair share contribution to TART to support transit service, or create a CSA or a CFD to fund the costs of increased transit services. If and when a CSA or CFD is formed, the project applicant shall no longer be responsible for making fair share payments to TART, and TART shall be fully responsible for adjusting bus service.~~ This mitigation measure meets the intent of Specific Plan	LTS

		Policies CP-2 through CP-4, and clarifies how the project would contribute to enhanced transit operations. Increased service may consist of more frequent headways, longer hours of operations, and/or different routes. The fee calculations shall consider both capital expenses and on-going operations and maintenance expenses.	

In response to comment O13-1, new Mitigation Measure 9-7b is added to Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-53 of the DEIR as follows:

		Mitigation Measure 9-7b: Maintain Membership in the Truckee North Tahoe Transportation Management Association (TNT/TMA). The following mitigation measure, while not required to achieve or maintain a less-than-significant impact conclusion, would further reduce the project's impacts to transit. Prior to approval of improvement plans/final maps, the project applicant shall maintain membership in perpetuity in the Truckee North Tahoe Transportation Management Association (TNT/TMA). Once commercial and homeownership groups have been formed, the project applicant shall shift the TNT/TMA membership to the associations and the associations shall maintain membership in perpetuity. It is not anticipated that membership will need to be cancelled; however, if for a reason unknown at this time cancellation of the membership is required, it shall be mutually agreed to by the County and the entity responsible for paying the annual dues.	

In response to comment L6-9, Mitigation Measure 9-8 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-53 of the DEIR is revised as follows:

Impact 9-8: Construction impacts. Project construction would generate employee and truck trips, which would use segments of SR 89 and Squaw Valley Road. These activities could cause lane closures, damage to roadways, and increased conflicts with bicyclists and pedestrians. This would be a significant impact.	S	**Mitigation Measure 9-8: Develop a Construction Traffic Management Plan.** Prior to recordation of the first Small Lot Final Map, the project applicant shall prepare a Construction Traffic Management Plan (CTMP) to the satisfaction of the Placer County Department of Public Works and the Engineering and Surveying Division. The plan shall include (but not be limited to) items such as: ◢ guidance on the number and size of trucks per day entering and leaving the project site; ◢ identification of arrival/departure times that would minimize traffic impacts; ◢ approved truck circulation patterns, including coordination with the Town of Truckee if the aggregate mine in the Town is used as a material source;	LTS

In response to comment L2-2, Mitigation Measure 10-2 in Table 2-2, "Summary of Impact and Mitigation Measures," on pages 2-54 through 2-56 of the DEIR is revised as follows with respect to PCAPCD's thresholds:

Impact 10-2: Long-term, operation-related (regional) emissions of criteria air pollutants and precursors. Operation of the Specific Plan under full buildout would result in days where the mass emissions of ROG and NOX, ozone precursors, in Placer County and the MCAB would exceed the PCAPCD-recommended mass emission threshold of 82 lb/day. Thus, long-term operational emissions of ROG and NOX could conflict with the air quality planning efforts and contribute substantially to the nonattainment status of Placer County with respect to the NAAQS and CAAQS for ozone. This would be a significant impact.	S	**Mitigation Measure 10-2: Implement an ongoing ROG and NO_X emissions review and reduction program.** This measure is designed to reduce the project's operational emissions of ROG or NOx to less than PCAPCD's project-level threshold of 82 lbs/day and to less than PCAPCD's cumulative threshold of 10 lbs/day. Mitigation measures for reducing operational emissions of ozone precursors were developed using PCAPCD guidance (PCAPCD 2012:C-1 through C-2) and mitigation guidance published by the California Air Pollution Control Officers Association (CAPCOA 2010) and the California Attorney General's Office (2010). The Lake Tahoe Sustainability Collaborative's Sustainability Action Plan was also reviewed for mitigation options as it includes multiple emission reduction measures that are well-suited to the climate and development patterns in the Sierra Nevada (Lake Tahoe Sustainability Collaborative 2013:4-1 through 4-37). Prior to recordation of each Small Lot Final Map, the project applicant shall prepare, to the satisfaction of Placer County Planning Services Division and PCAPCD, a chart or table with supporting analysis, which demonstrates that construction and operation of the proposed phase, combined with emissions from all past approved phases, will not result in ROG or NOx emissions in excess of ~~82~~ 10 lbs/day. Compliance with this threshold may be achieved through project design and/or other "on-site" measures, which may include any of the project-level reduction measures listed below. Alternatively, the project applicant may demonstrate compliance with this mitigation measure, partially or wholly, through off-site measures (i.e., emission reductions not directly associated with the proposed project but funded/implemented by the applicant, such as reducing emissions associated with ski operations) and/or purchase of offset credits identified below. Placer County Planning Services Division shall maintain a file for the charts to provide future applicants with the historical emissions record and approved tracking methodology. The project applicant shall be responsible for the funding and implementation of all identified reduction measures. The ROG and NOX reduction benefits achieved by all measures must occur during the ozone season (May through October). The method used to quantify the reduction or offset amount achieved by each measure must be approved by the County and PCAPCD. Subsequent to the implementation of all selected reduction measures, the project applicant shall evaluate and report the effectiveness of the measures annually to the County and PCAPCD to verify that the suite of	LTS

		measures result in the combined reduction in ROG and NOX that was expected. This annual reporting shall be completed and submitted to the County and PCAPCD within 30 days of the end of each ozone season. If it is determined that the effectiveness of reduction measures has been overestimated, then additional reduction measures must be implemented. Similarly, if it can be verified that reduction measures achieve better than anticipated results, or previous emission estimates were above actual emission levels, the overall emission reduction approach can be adjusted accordingly. Types of reduction and offset measures implemented by the project applicant may include, but are not limited to, the measures listed below, so long as the combination of selected measures results in calculated emissions below the target threshold. Note that not all of these measures need to be implemented; rather, the project applicant will be required to implement a combination of those measures needed to reduce ROG and NOX emissions below the ~~82~~ 10 lbs/day threshold:	

In response to comment L2-3, Mitigation Measure 10-2 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-59 of the DEIR is revised as follows:

		OFFSET MEASURES ◢ Establish mitigation off-site within the portion of Placer County that is within the MCAB by participating in an off-site mitigation program, coordinated through PCAPCD. Examples include, but are not limited to retrofitting, repowering, or replacing heavy duty engines from mobile sources (e.g., busses, construction equipment, on-road haulers, boilers, ski lift equipment, grooming equipment); or other programs that the project proponent may propose to reduce emissions. ◢ Participate in PCAPCD's Off-site Mitigation Program by paying the equivalent amount of fees for the project's contribution of ROG and NO_X that exceeds the 82 lbs/day. The applicable fee rates changes over time. At the time of writing this EIR, the fee rate is $18,030 per ton emitted during the ozone season. The actual amount to be paid shall be determined, and satisfied per current California Air Resource Board guidelines, at the time of recordation of the Final Map (residential projects), or issuance of a Building Permit (non-residential projects).	

In response to comment L2-1, Mitigation Measure 10-2 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-59 of the DEIR is revised as follows:

		CONSTRUCTION MEASURES ◢ Cease or substantially limit ROG- and NO_X–	

		generating construction activity during peak operations (i.e., peak occupancy periods) of buildings and facilities that are already built and operational under the Specific Plan. ◢ Prior to approval of Grading or Improvement Plans, whichever occurs first, the applicant shall submit a Construction Emission/Dust Control Plan to PCAPCD. The applicant shall deliver approval from the PCAPCD to the Placer County Planning Services Division.	

In response to DEIR comments regarding potential construction noise at Squaw Valley Academy, a boarding school near the East Parcel site (see the Master Response regarding noise), Mitigation Measure 11-1a in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-61 of the DEIR is revised as follows:

		◢ When existing and future noise sensitive uses are within close proximity to prolonged construction noise, noise attenuating buffers such as structures, truck trailers, temporary noise curtains or sound walls, or soil piles shall be located between noise sources and the receptor to shield sensitive receptors from construction noise. ◢ Construction on the East Parcel shall be designed to avoid intrusive noise, defined as an interior noise level of 45 dBA L_{eq} /65 dBA L_{max} or greater, during the time when classroom activities take place at the Squaw Valley Academy. The applicant shall coordinate with administrators at the academy and shall achieve these performance standards either by adjusting the timing of construction, adjusting construction methods during times of classroom instruction, temporary screening, and/or improving noise attenuation at the school by replacing windows, increasing insulation, etc., as needed. The applicant shall prepare and submit to Placer County an acoustical study that demonstrates these criteria will be met prior to approval of each Small Lot Tentative Map for all construction on the East Parcel.	

In response to DEIR comments regarding traffic noise impacts to existing sensitive receptors along Squaw Valley Road (see the Master Response regarding noise), Mitigation Measure 11-5 in Table 2-2, "Summary of Impact and Mitigation Measures," on pages 2-66 through 2-67 of the DEIR is revised as follows:

Impact 11-5: Exposure of new and existing sensitive receptors to operational project-generated transportation noise sources. Implementation of the project could expose existing and future planned sensitive receptors to transportation noise levels that exceed the Placer County noise standard of 60 dBA L_{dn} at the property line of residential land uses. Therefore, this impact would be significant.	S	~~**Mitigation Measure 11-5: Reduce transportation noise exposure to sensitive receptors.** For new sensitive receptors developed as part of the proposed project and that would be located within 170 feet of the centerline of Squaw Valley Road (i.e., the distance from the centerline that is estimated, based on the noise modelling, to result in exceedance of the Placer County transportation related exterior noise standard of 60 dBA L_{dn}), the following design criteria shall be adhered to:~~ ~~◢ Building materials and design shall be used that~~	New Receptors: Exterior Noise Levels: LTS Interior Noise Levels: LTS Existing

		~~achieve, at a minimum, 25 dBA of exterior to interior noise attenuation. In all cases, interior noise levels comply with the Placer County interior noise standard of 45 dBA L_{dn}.~~ **Mitigation Measure 11-5: Reduce roadway noise levels on Squaw Valley Road.** To reduce noise levels associated with increased traffic on Squaw Valley Road, the project applicant shall install a rubberized hot mix asphalt overlay (RHMA) or equivalent surface treatment with known noise reducing properties on top of the existing conventional asphalt of Squaw Valley Road along the segment identified below. Sufficient project generated traffic resulting in a significant contribution to the exceedance of noise standards does not occur until the later portions of project implementation. Therefore, the RHMA overlay need not be installed immediately at project initiation. The RHMA overlay shall be installed when development reaches 30 percent of all proposed Hotel/Condo/Cabin Units Land uses (i.e., 255 units or more), which would be the point where current modeling indicates traffic noise may exceed standards. The RHMA overlay shall meet the following conditions: ◢ A RHMA overlay shall be installed on top of the existing conventional asphalt on Squaw Valley Road beginning at its' intersection with SR 89 and terminating at its intersection with Christy Lane. ◢ The RHMA overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4-6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to current noise levels. ◢ Prior to installation of any RHMA overlay, the applicant shall hire a qualified acoustical engineer to review all design parameters to ensure that the RHMA design is adequate, based on most current technology, practices, and availability of products, such that, at a minimum, 4 dB in noise reduction relative to conditions without a RHMA overlay would be achieved.	Receptors: Exterior Noise Levels: ~~SU~~ LTS Interior Noise Levels: LTS

To ensure that cross-referencing of all relevant mitigation is clear, and in response to comment S4-8, Mitigation Measure 13-1 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-70 of the DEIR is revised as follows:

Impact 13-1: Well and sewer line construction and abandonment risks to groundwater and surface water quality. Implementation of the proposed project would result in the construction new water supply wells and destruction of some existing wells, and abandonment of some existing sewer lines. If wells are not properly sited, constructed, or destroyed, or if sewer lines are not properly	PS	**Mitigation Measure 13-1: Implement water and sewer infrastructure water quality protection measures.** The project applicant shall implement the following actions, including standard mitigation measures as required by the County, to protect water quality during the design, installation, and destruction/abandonment of wells and sewer lines:	LTS

abandoned, contamination of groundwater and/or discharge of contaminated groundwater to surface water could result. Various codes and regulations address the protection of water quality during these activities. If these codes and regulations are not properly adhered to, this impact would be potentially significant.		◢ Prior to providing final authorization for drilling of a well (e.g., initiating an applicant directed test well, providing access to property for a well drilled by another entity, final agreement to fund a well drilled by another entity), the project applicant shall confirm that required fees are paid and a drilling permit is obtained from Environmental Health Services for each well and that the location of the well meets applicable DWR criteria for distances from utility infrastructure (e.g., stormwater, sewer, and petroleum pipelines and petroleum storage tanks). ◢ Prior to approval of a Final Subdivision Map, the applicant shall provide to Placer County Environmental Health Services final design drawings indicating that separation between any planned or existing wells in the map area and any planned or existing stormwater, sewer, and petroleum pipelines and petroleum storage tanks is sufficient to meet applicable DWR separation requirements. ◢ Prior to approval of a Final Small-Lot Subdivision Map, complete or provide for the proper destruction under permit and inspection, of existing wells and abandonment of sewer lines located within the project site. ◢ Prior to approval of an Improvement Plan that includes the need for well destruction or sewer line abandonment, well destruction and/or sewer line abandonment shall be shown on the Improvement Plans; the actions shall be included in the engineers' estimate of costs for subdivision improvements; and the Improvement Plan will include a Plan Note indicating proper destruction, under permit and inspection, of the existing wells and abandonment of sewer lines located within the Improvement Plan area. The project applicant shall also implement relevant provisions of Mitigation Measures 13-2a and 13-2b.	

In response to comments L4-34, L5-5, and O12b-2, Mitigation Measure 14-2a in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-81 of the DEIR is revised as follows:

Impact 14-2: Increased demand for wastewater collection, conveyance, and treatment. The project would be served by existing and upgraded (as part of the project) sewer facilities that have sufficient capacity to collect, and convey wastewater through the project area. Further, T-TSA has sufficient capacity to treat wastewater at its treatment plant outside of Truckee. However, there may not be sufficient capacity in the Truckee River Interceptor during peak flow periods to serve existing plus project flows. The impact would be potentially significant.	PS	**Mitigation Measure 14-2a: Provide sufficient on-site wastewater storage.** In the event that T-TSA finds that project-generated peak wastewater flows may exceed the capacity of the TRI, wastewater detention facilities, such as enlarged pipes, vaults, or tanks, shall be incorporated into the Specific Plan to time wastewater flows to off-peak conditions when the TRI has sufficient capacity. These facilities will be located within the plan area and will be underground or otherwise incorporated into project's development footprint (e.g., incorporated into a building podium). All facilities will be designed and maintained according to applicable design standards such that effluent would be fully contained. The project	LTS

		applicant shall work directly with T-TSA to determine a sufficient volume of detention capacity for the project and to define the methodology for determining when wastewater detention facilities should be used, and timing for releases from these facilities. The capacity of the on-site storage shall only be sufficient to meet the peak capacity needs associated with the project. A SVPSD representative's signature ~~from T-TSA~~ shall be provided on the Improvement Plans. **Mitigation Measure 14-2b: Obtain will-serve requirements letter from the public service district.** Prior to Improvement Plan approval, the project applicant shall submit to Environmental Health Services a "will-serve" letter from the SVPSD indicating that the district can and will provide sewer service to the project. Connection of each lot in this project to a public sanitary sewer is required.	

In response to the recent California Supreme Court decision, *Center for Biological Diversity v. California Department of Fish and Wildlife (CBD v CDFW)*, to update the analysis to more current emissions data and as explained in detail in Section 3.1, "Master Responses," of this FEIR, Impact 16-2 and Mitigation Measure 16-2 in Table 2-2, "Summary of Impact and Mitigation Measures," on pages 2-88 and 2-89 of the DEIR are revised as follows:

Impact 16-2: Operational greenhouse gas emissions. GHGs associated with operation of the Specific Plan would exceed the Tier I mass-emission threshold of 1,100 MT CO2e/year~~; however, operational GHGs would not exceed the GHG efficiency based Tier II threshold recommended by PCAPCD for 2020~~. ~~Nevertheless,~~ GHG emissions would be substantial ~~and may be less efficient than needed to achieve GHG reduction targets that could be in place after 2020~~, when the project is completed. Therefore, operation of the Specific Plan has the potential to result in a substantial contribution to GHG emissions. This impact would be potentially significant.	PS	**Mitigation Measure 16-2: Implement ongoing operational greenhouse gas review and reduction program.** The state legislature or Governor's Office may establish new GHG targets or other programs or metrics that apply ~~for the period~~ both before and after 2020, as discussed in the First Update to the Climate Change Scoping Plan, released by ARB in May 2014 (and discussed above in Section 16.2.2) and in response to CBD v CDFW as it relates to connecting Scoping Plan targets to individual projects. Any projects processed by the County ~~after 2020~~ will be required to reduce, to the extent needed and feasible, GHG emissions such that the project operates within the targets or adopted plan established at the time the project is submitted for approval, as explained below. The County shall require the following actions for all subdivision maps submitted for approval ~~after December 31, 2020~~: ◢ In consultation with the PCAPCD and Placer County, the applicant shall demonstrate, based on currently adopted regulations and industry-accepted GHG calculation methods, whether operation of the subdivision would be consistent with GHG targets adopted by the State. "Adopted" means that a specific GHG reduction target, such as is currently specified in the Global Warming Solutions Act of 2006 (achieve 1990 levels by 2020), is required by state legislative action, state administrative action, by legislative action of Placer County, or an applicable qualified Climate Action Plan or similar GHG reduction plan approved by Placer County. The target or plan shall be based on a substantiated	PSU

		linkage between the project (or Placer County projects in general if a countywide qualified GHG reduction plan is approved) and statewide GHG reduction goals. ~~"Within GHG targets" means that the subdivision, using methods such as a comparison between No Action Taken and the subdivision as proposed scenarios, would achieve or exceed the target.~~ ◢ If the subdivision achieves or exceeds the reduction target or plan, no further actions shall be required. ◢ If the subdivision does not meet the target, then measures shall be incorporated into the subdivision to reduce GHG emissions to the target or plan level and to the extent~~, if it is~~ feasible ~~to do so~~. Emissions reductions provided by these measures shall be calculated to determine if targets can be achieved. These measures may include any combination of GHG reduction actions needed to achieve the target, including: ◤ Actions included in Mitigation Measure 10-2 that also reduce GHG emissions (menu of options to reduce ROG and NOX emissions to a specified level such as trip reduction and energy management; nearly all of these measures would similarly reduce GHG emissions); ◤ Actions specified in Specific Plan Section 7.6, "Climate Change Initiatives," but with mandated actions (instead of "should" or "encourage" the actions, use "shall"), such as requiring that all buildings exceed Title 24 energy-efficiency requirements by 15 percent; requiring incorporation of on-site renewable energy production to meet at least 25 percent of the subdivision's electricity needs, etc. ◤ Payment of GHG offset fees to an ARB-approved GHG reduction program. Project applicant will consent to any GHG reduction fees that may be applicable after January 1, 2020.	

In response to several comments and as discussed in the Master Response regarding noise, Mitigation Measure 11-5 was revised to require the installation of a rubberized hot mix asphalt overlay (RHMA) on top of the existing conventional asphalt of a segment of Squaw Valley Road, which also mitigated cumulative traffic noise impacts. Accordingly, Impact 18-32 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-93 of the DEIR is revised as follows:

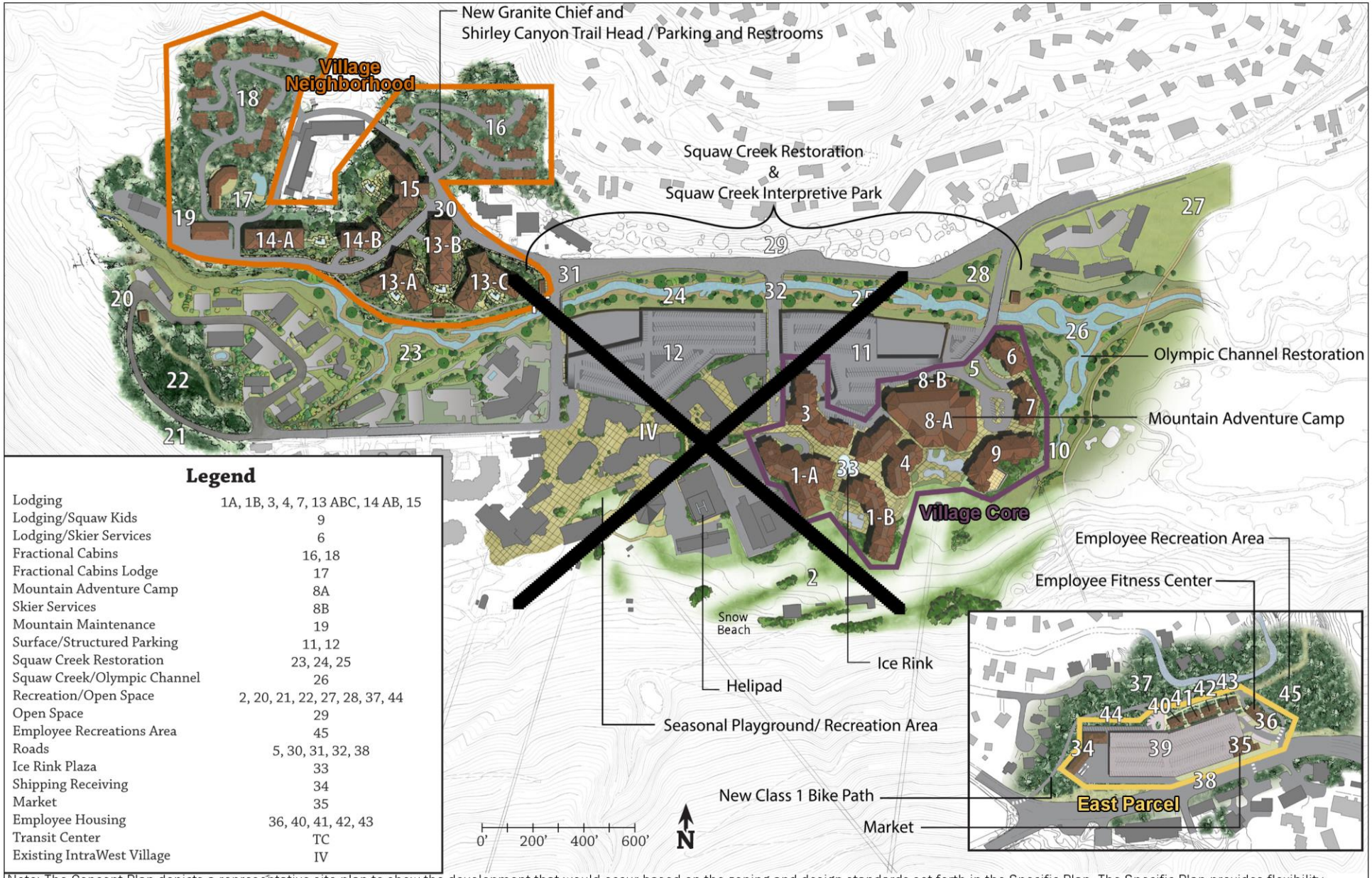
Impact 18-32: Cumulative long-term ambient noise levels.	S	~~There are no additional feasible mitigation measures available to reduce this cumulative impact to a less than significant level.~~ No additional mitigation is required.	~~SU~~ LTS

2.3.3 Revisions to Chapter 3, "Project Description"

As described in Section 2.1 of this FEIR, the project applicant has proposed several modifications to the proposed project since publication of the DEIR. These changes are described in detail in Section 2.1 of this FEIR, but are not shown here in strikeout and underline except for the below exhibits.

Due to the project modifications described in Section 2.1 of this FEIR, Exhibits 3-5 and 3-6 on pages 3-12 and 3-15 of the DEIR are revised as follows:

In response to comment F2-2, Exhibit 3-15 on page 3-30 of the DEIR is revised as follows:



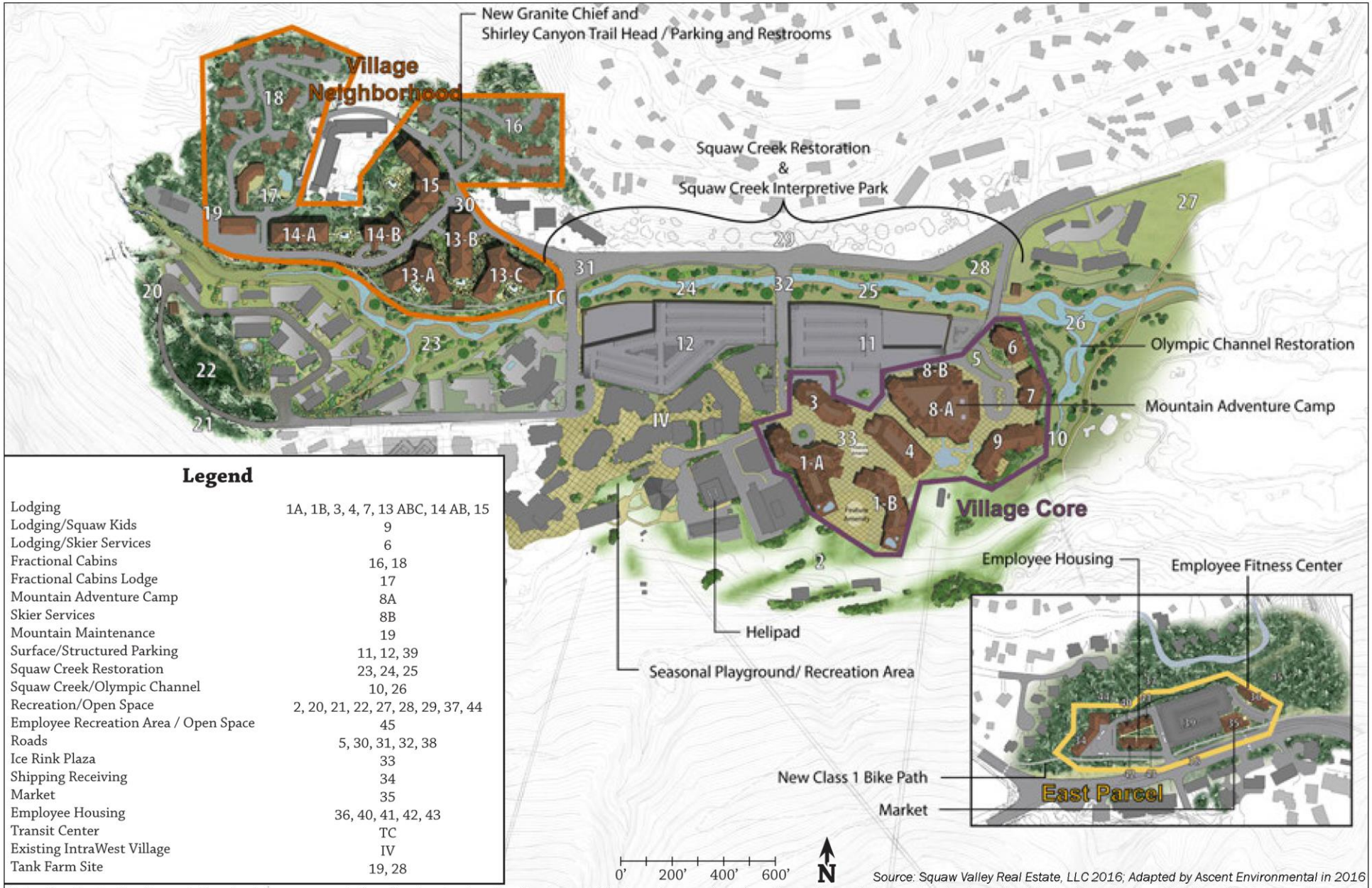
Note: The Concept Plan depicts a representative site plan to show the development that would occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Concept Plan is illustrative.

Source: Squaw Valley Real Estate, LLC 2015; Adapted by Ascent Environmental in 2015

X11010091 03 003

[Old] Exhibit 3-5

Illustrative Concept Plan



Legend

Lodging	1A, 1B, 3, 4, 7, 13 ABC, 14 AB, 15
Lodging/Squaw Kids	9
Lodging/Skier Services	6
Fractional Cabins	16, 18
Fractional Cabins Lodge	17
Mountain Adventure Camp	8A
Skier Services	8B
Mountain Maintenance	19
Surface/Structured Parking	11, 12, 39
Squaw Creek Restoration	23, 24, 25
Squaw Creek/Olympic Channel	10, 26
Recreation/Open Space	2, 20, 21, 22, 27, 28, 29, 37, 44
Employee Recreation Area / Open Space	45
Roads	5, 30, 31, 32, 38
Ice Rink Plaza	33
Shipping Receiving	34
Market	35
Employee Housing	36, 40, 41, 42, 43
Transit Center	TC
Existing IntraWest Village	IV
Tank Farm Site	19, 28

Source: Squaw Valley Real Estate, LLC 2016; Adapted by Ascent Environmental in 2016

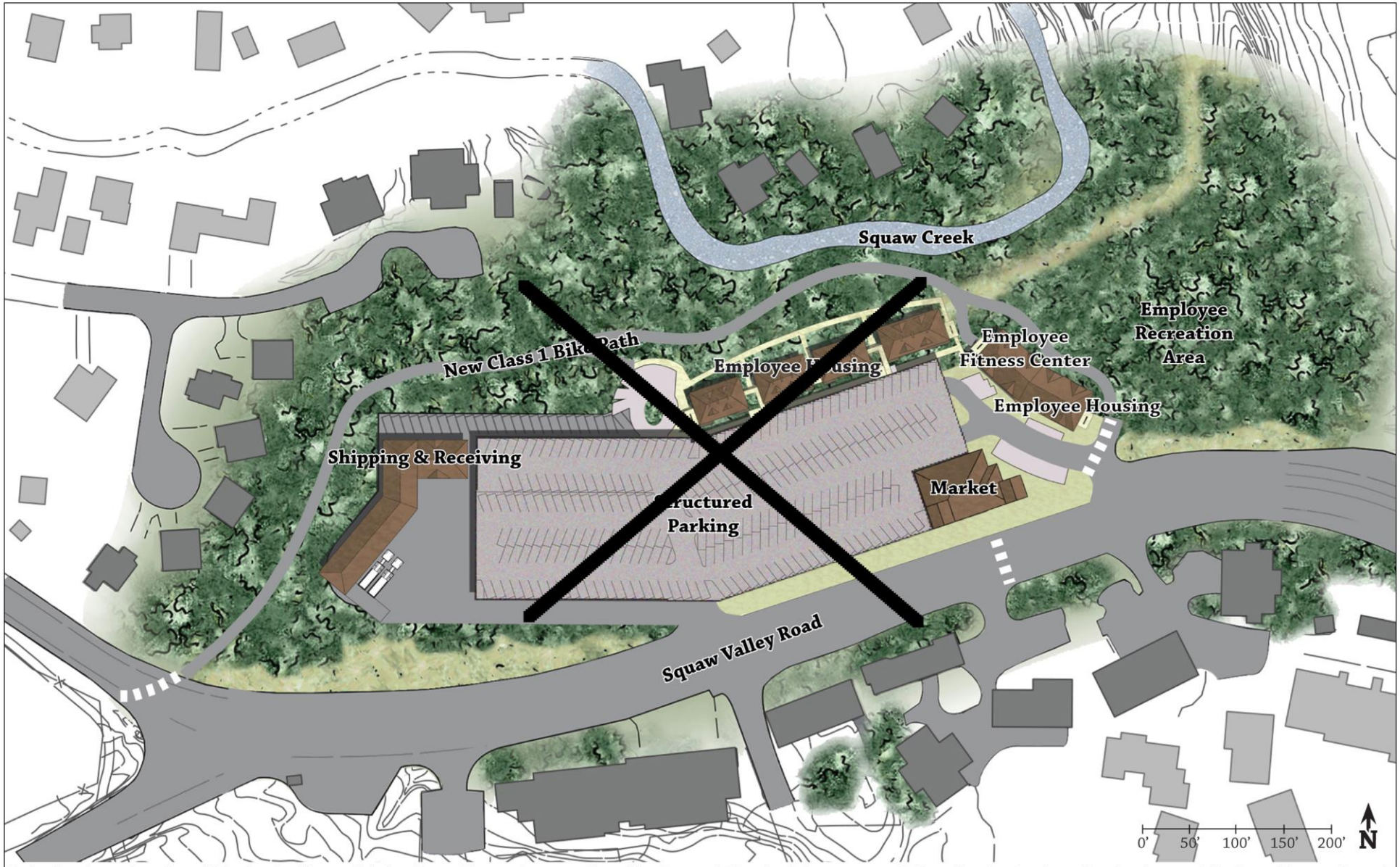
Note: The Illustrative Concept Plan depicts a representative site plan to show the development that could occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Illustrative Concept Plan is subject to change.

X11010091 04 007

[Revised] Exhibit 3-5

Illustrative Concept Plan

ASCENT ENVIRONMENTAL



Note: Employee housing will be located immediately adjacent to or above parking. The Concept Plan depicts a representative site plan to show the development that would occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Concept Plan is illustrative.

Source: Squaw Valley Real Estate, LLC 2015; Adapted by Ascent Environmental in 2015

X11010091 03 006

[Old] Exhibit 3-6

Concept Plan for the East Parcel

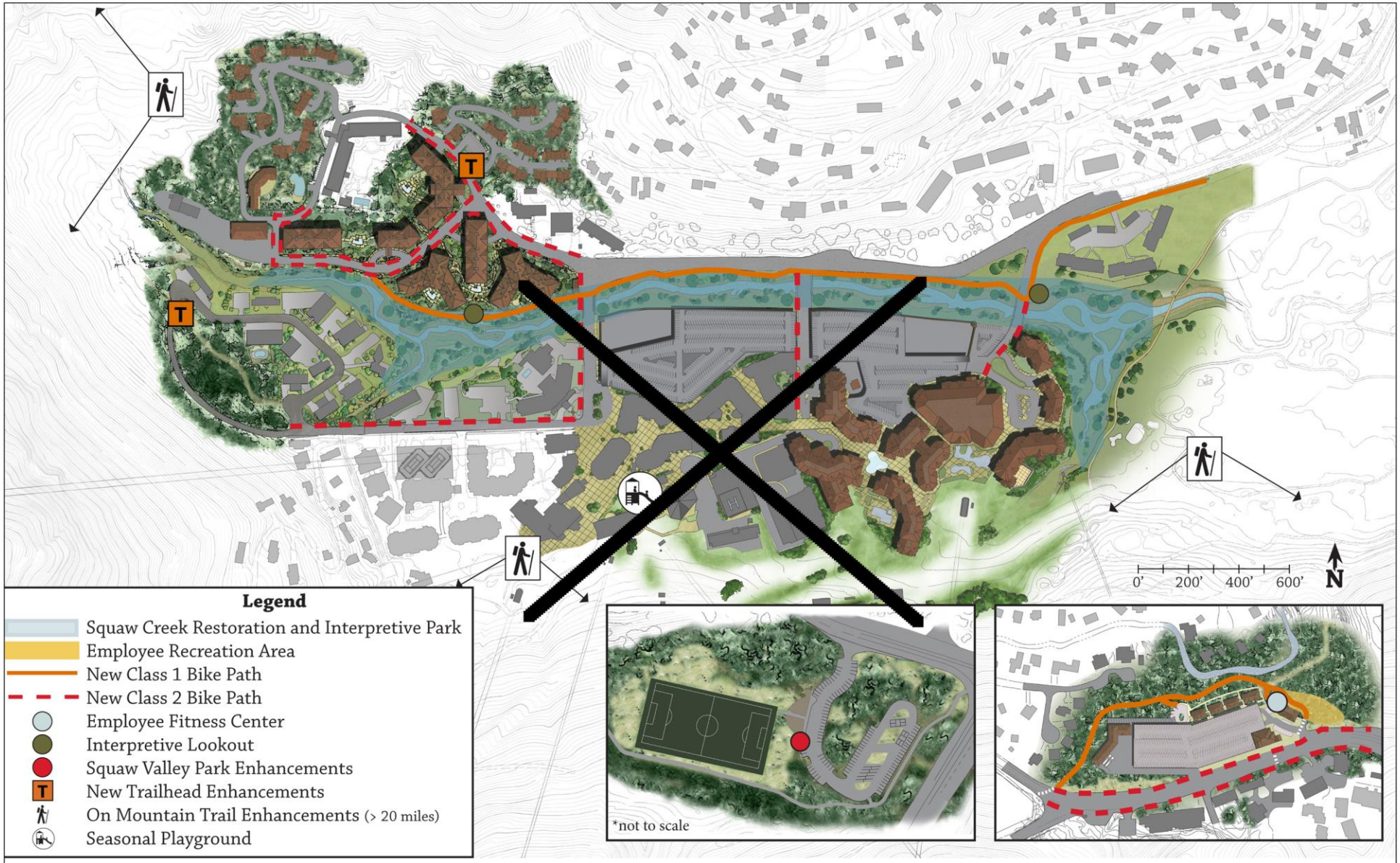
Note: Employee housing will be located immediately adjacent to or above parking. The Concept Plan depicts a representative site plan to show the development that would occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Concept Plan is illustrative.

Source: Squaw Valley Real Estate, LLC 2015; Adapted by Ascent Environmental in 2015

X11010091 04 008

[Revised] Exhibit 3-6

Concept Plan for the East Parcel



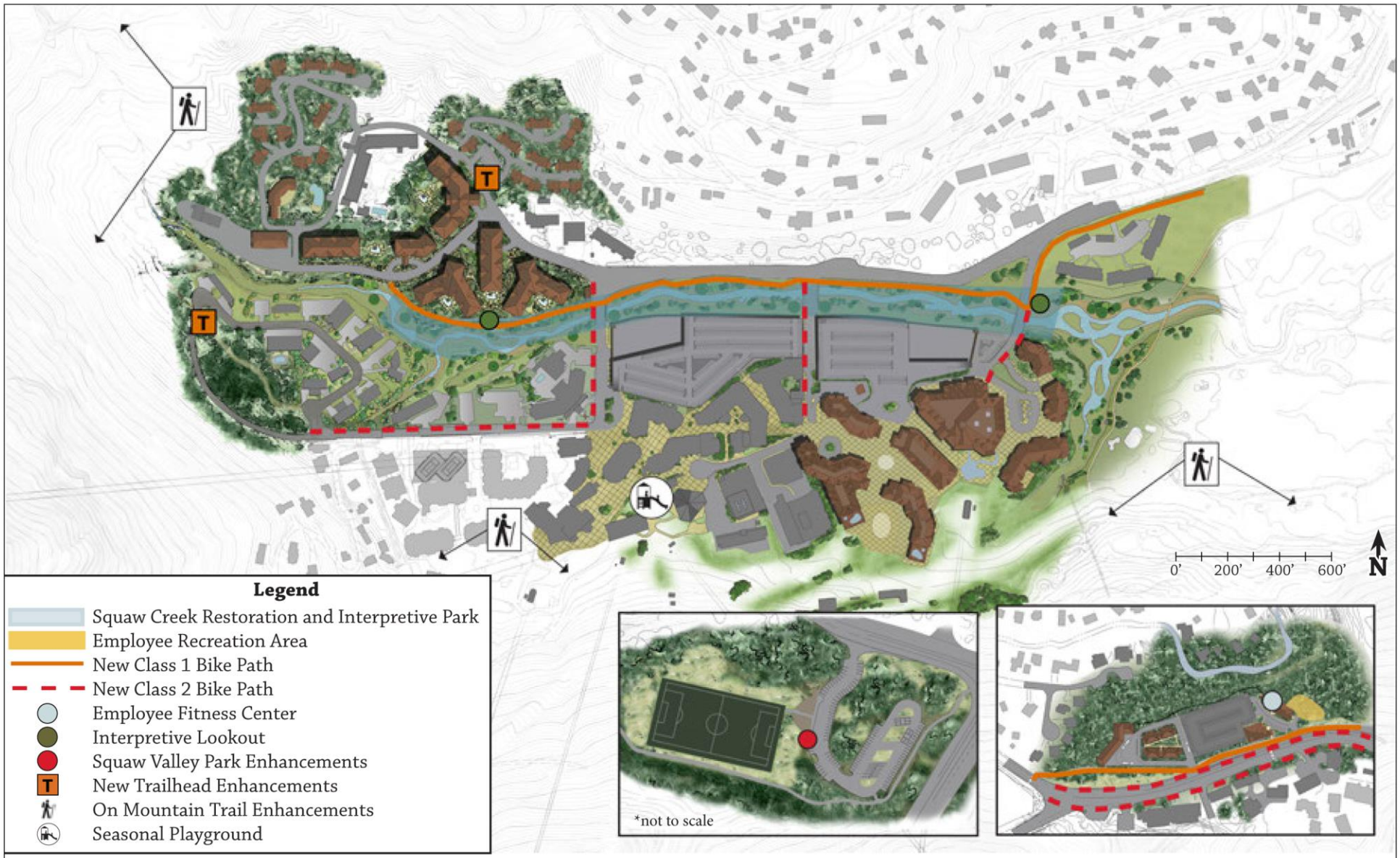
Note: The Illustrative Concept Plan depicts a representative site plan to show the development that could occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Illustrative Concept Plan is subject to change.

Source: Squaw Valley Real Estate, LLC 2015; Adapted by Ascent Environmental in 2015

X11010091 03 029

[Old] Exhibit 3-15

Parks and Recreation Plan



Note: The Illustrative Concept Plan depicts a representative site plan to show the development that could occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Illustrative Concept Plan is subject to change.

Source: Squaw Valley Real Estate, LLC 2016; Adapted by Ascent Environmental in 2016

X11010091 04 009

[Revised] Exhibit 3-15

Parks and Recreation Plan

In response to comment F2-2, Table 3-3 on page 3-31 of the DEIR is revised as follows:

Table 3-3 Proposed Parks and Recreation Improvements

Park/Facility	Proposed Improvements
Squaw Creek Linear Park and New Class I Trail	◢ Complete trail connectivity from State Route 89 to Shirley ~~Lake~~ Canyon Trailhead ◢ Add trail improvements to connect the East Parcel to the existing Squaw Valley Trail ◢ Include interpretive signage and points of interest along the trail path
Squaw Valley Trailheads	◢ Through signage, informational materials, and site rehabilitation (e.g., establish bike parking, provide shaded picnic area) better identify the Granite Chief Trailhead location and parking ◢ Provide off-street vehicle parking, bike parking, restrooms, and shaded picnic area (space permitting) at the Granite Chief and Shirley ~~Lake~~Canyon Trailheads
~~New~~ Trail ~~Development~~ Improvements and Repairs	~~◢ Improve existing and develop new trail connections between Alpine Meadows and Squaw Valley (extent and location of trail improvement/development not yet confirmed)~~ ◢ Improve and repair existing trails in Squaw Valley, including the Granite Chief / Shirley Canyon Loop Trail, Shirley Canyon Trail, World Cup Trail connection to the Western States Trail, and Thunder Mountain Trail by compacting, removing obstacles, and otherwise improving conditions on the existing trails ◢ In addition, a new trail alignment between Granite Chief Trail and Shirley Canyon Trail may be identified and constructed
East Parcel Trails	◢ Construct a ~~hiking trail and~~ Class I & II bicycle path ~~through the~~ along Squaw Valley Road and East Parcel frontage to connect employee housing ~~and an existing trail~~ to the existing Class I bicycle path along Squaw Valley Road.
Squaw Valley Community Park	◢ Upgrade restroom facilities to include flush toilets and sewer lift station
New Squaw Valley Seasonal Playspace	◢ Tot to kinder 3-dimensional play structures ◢ Relocatable and removable during ski season ◢ Open to public use

Source: Squaw Valley Real Estate, LLC 2015

In response to comment F2-8, the list of federal agencies from which permits and approvals may be required on page 3-40 of the DEIR is revised as follows:

FEDERAL

- U.S. Army Corps of Engineers: Compliance with Section 404 of the Clean Water Act for discharge of fill to Waters of the U.S. and/or fill of any wetlands that cannot be avoided by the project; including compliance with Section 106 of the National Historic Preservation Act, in coordination with the California State Office of Historic Preservation, for effects to eligible cultural or historic resources.
- U.S. Environmental Protection Agency: Concurrence with Clean Water Act Section 404 permit.
- U.S. Fish and Wildlife Service: Compliance with Section 7 of the federal Endangered Species Act for federal agency approvals if there is potential take of listed species.
- U.S. Forest Service: Approval of improvements to any trails or related facilities on USFS land, such as the Shirley Canyon Trail.

2.3.4 Revisions to Chapter 4, "Land Use and Forest Resources"

None

2.3.5 Revisions to Chapter 5, "Population, Employment, and Housing"

To clarify one of the sources of population data used in the DEIR, the last paragraph on page 5-2 of the DEIR is revised as follows:

> Placer County estimates that the current maximum overnight peak population of Olympic Valley is approximately 5,858 residents and guests, including existing single- and multi-family residences, as well as existing condo, timeshare, and hotel lodging units (Fisch, pers. comm., 2014). Existing peak guest populations of condominium hotel properties including the Intrawest Village, the Resort at Squaw Creek, and the Squaw Valley Lodge are estimated to contribute a maximum peak overnight population of 2,757 guests. This estimate was developed by applying the occupancy rate assumptions developed in the Water Supply Assessment (WSA; Appendix C), which determined an average population of 1.6 persons per bedroom for managed condo hotel lodging units and 2.0 persons per bedroom in unmanaged condo hotel lodging units. The calculation was based upon a conservatively assumed 100 percent occupancy rate for all lodging units in the rental pool and 100 percent occupancy for all owner-occupied units. The conservative nature of the calculation was increased by multiplying the occupancy estimate by a 1.31 peak factor that was developed from review of peak period overnight guest occupancies (i.e., the factor necessary to get from the average guest population used in the WSA to the peak average observed on August 30, 2014 and December 29 and 30, 2014). Existing timeshare and hotel lodging units including the Olympic Village Inn, PlumpJack Squaw Valley Inn, and the Red Wolf Lodge are estimated to contribute a peak overnight population of 923 guests assuming 100 percent of all rooms/suites are occupied with an average occupancy rate of 4 persons per bedroom and applying the same peak factor of 1.31. The peak population of existing single- and multi-family residences is estimated to be 2,178, based on the number of units reported in the 2010 U.S. Census, plus construction permits issued between June 2010 and February 5, 2014 (1,037 total units), and assuming 2.1 persons per household. This is a conservative estimate of existing peak overnight population that assumes all available units are 100 percent occupied. Actual overnight peak occupancies are unknown.

To clarify one of the sources of population data used in the DEIR, the first paragraph under Impact 5-2 on page 5-11 of the DEIR is revised as follows:

> The Specific Plan proposes the construction of new housing units. As described in Chapter 3, "Project Description," within the main Village area, the Specific Plan allows for a maximum of up to 1,493 bedrooms (within up to 850 units, and not including employee housing) that would include a mixture of hotel, condo hotel, fractional ownership, and timeshare units (see Table 3-1). These types of units would support a tourist-based, transient population. Based on average annual occupancy rate assumptions, this is anticipated to result in an average population of 1,196 project guests (Farr West Engineering et al. 2014). Peak overnight population, assuming full occupancy of all available units, could reach 3,625 guests and employees (based on 1,120 managed bedrooms with an average occupancy of 1.6 persons each and 373 unmanaged bedrooms with an average occupancy of 2.0, each multiplied by a peak factor of 1.31, plus 300 employees residing in provided employee housing) (Fisch, pers. comm., 2014).

2.3.6 Revisions to Chapter 6, "Biological Resources"

In response to comment O8b-14, the text formatting for the wet meadow heading in Table 6-4 on page 6-25 of the DEIR is revised as shown below in an excerpt of Table 6-4:

Table 6-4 Acres of Potential Wetlands and Other Waters of the United States within the Project Site

Wetlands and Other Waters of the U.S.[1]	Main Village	East Parcel	Utilities and Other Facilities	Total Acres on Project Site
Seasonal Wetland/Willow Scrub				
SW/WS-1		0.158	0.035	0.193
SW/WS-2		0.097		0.097
Wet Meadow				*1.081*
WM-1	0.231			0.231
WM-2	0.053			0.053
WM-3	0.067	-	-	0.115
WM-4	0.047	-	-	0.047
WM-5	-	-	0.018	0.018
WM-6	-	-	0.0002	0.0002
WM-7	-	-	0.003	0.003
WM-8	-	-	0.0002	0.0002
WM-9	-	-	0.314	0.314
WM-10	-	-	0.275	0.275

In response to multiple comments in letter O8b (i.e., O8b-15, O8b-17 through O8b-22, O8b-29 through O8b-32, and O8b-35) and to reflect additional information available since release of the DEIR, the analysis under Impact 6-1 on pages 6-40 through 6-46 of the DEIR is revised as follows with respect to the discussion of operational impacts to riparian vegetation and meadow vegetation, beginning with the first full paragraph on page 6-43 and ending after the first full paragraph on page 6-45 of the DEIR:

> Establishment of seedlings and saplings is important to maintaining a healthy riparian community as well as successful riparian habitat restoration. While some riparian tree species like black cottonwood can regenerate ~~primarily~~ through suckering from adult trees (sprouting from shallow roots or the tree base) in drier areas away from the streambank, riparian tree seedlings from species such as cottonwood and willow require water tables within 3.3 feet of the ground surface (Mahoney and Rood 1998, Shafroth et al. 2000, Scott et al. 1999, USDA 2004). Therefore, having a groundwater depth from surface <3.3 feet for ~~establishment~~ survival of seedlings/saplings is taken into account when considering whether any groundwater reduction from proposed new wells and increased pumping would negatively impact perennial riparian vegetation.
>
> Cottonwood seed germination requires moist seeds beds at the soil surface for up to a month after seed deposition for germination and seedling survival, prior to deep root growth (Steinberg 2001, DeBell 1990). Reduced groundwater levels could impact riparian seedling germination and initial survival where summer months have reduced soil moisture in areas currently adequate. Rood and Mahoney 1998 report that studies show that cottonwood species seeds generally have adequate moisture 60 centimeters (1.9 feet) to 150 centimeters (4.9 feet) above the base flow of the stream during summer months. This level of groundwater depth can be used to address adequacy of germination potential sites. Sites would have to have groundwater levels less than 1.9 feet from the

surface for more than two consecutive months during the summer from July to October when seed falls, since exposed germination rates are highest when moist conditions persist for a month after seed deposition (Steinberg 2001), would likely be disseminated around mid-July, and seeds are usually only viable in natural conditions for 2 weeks to a month (DeBell 1990).

Studies have also documented sublethal indirect effects on black cottonwood and other riparian tree species such as reduced tree growth, crown dieback, and lower canopy foliage density (Stromberg and Patten 1990, 1992, and 1996, Rood and Mahoney 1990, Scott et al 1999, Lite and Stromberg 2005) from reduced groundwater or changes to flow regime. These effects could occur in areas where the threshold for tree mortality described above is not reached, but reductions in available groundwater are still sufficient to cause measurable stress to existing trees. The groundwater levels at which these sublethal impacts could occur for the species present along Squaw Creek are not described in sufficient manner to determine areas of impact based on the literature surveyed for this project. Those areas that are impacted by significant reductions in groundwater level described below would be susceptible to these indirect effects.

Exhibits 13-23 through 13-27 in Chapter 13 show simulated groundwater elevations under the baseline and project scenarios (including the cumulative 2040 scenario evaluated in the Water Supply Assessment [WSA] prepared for the project) and comparison to surface elevation in the same model cells (Todd Groundwater 2015). Exhibit 13-22 also shows the location of the "West Cells, A through J" identified in the study (Village reach, western channel) and East Cells, A through N (meadow reach) at which data was taken and simulated. Based on observations from this data (Todd Groundwater 2015), the bullet items below reflect whether the areas where perennial riparian vegetation requirements described above would not be met:

- West Cells ~~B, D, E, G and H~~ E, F, G, H and I show more years with maximum groundwater depths >10 feet below the surface during the growing season when compared with baseline and non-project (i.e., future Olympic Valley development condition without the proposed project) conditions. ~~However, b~~Baseline groundwater conditions for West Cells A, B, and D are generally greater than 10 feet below the surface in most years. So it can be expected that this is a circumstance where existing perennial riparian vegetation likely has root systems that extend farther than 10 feet below the ground surface. ~~Thus there will likely be no substantial increase in probability of mortality to established vegetation in these areas based on the groundwater depths > 10 feet criteria.~~ Only the East Cells and West Cells C and J will be less than 10 feet below the creek bed during summer months for all years after plan implementation and have a higher likelihood to maintaining perennial riparian vegetation. Thus, there will be no impacts from the project to established riparian vegetation in the East Cells or West Cells A, B, C, D, and J. West Cells E, F, G, H, and I may experience some mortality to the riparian vegetation located at the bottom of the channel due to the increase in depths and duration. Additionally, these cells may experience indirect effects such as branch die-back or reduced growth, especially during stressful low water years.

- Relative to seedling/sapling establishment and survival and providing water tables within 3.3 feet of the ground surface, specific to this parameter, all West Cells except Cells F, G, and J would experience similar conditions to the baseline and Non-Project conditions with groundwater withdrawals for the new development. West Cell F, G, and J would see unsuitable establishment/survival conditions increase from 60-68 percent of years under Non-Project conditions to all or almost all years under 2040 WSA conditions; removing any possibility of good germination years. ~~These~~ All other West Cell areas already experience groundwater levels greater than 3.3 feet below the ground surface for either all modelled years, or ~~almost all~~ most modelled years (greater than 75 percent of years), with an expected commensurate reduced potential for seedling/sapling establishment and survival. Further reductions in groundwater levels associated with implementation of the VSVSP and other development would only move groundwater levels further below the 3.3 foot threshold, which would not result in a greater

reduction in the potential for seedling/sapling ~~establishment and~~ survival. Whether groundwater levels are 4 feet below the ground surface or 14 feet below the ground surface, conditions are highly unfavorable for seedling/sapling establishment and survival. Seedlings/sapling survival and establishment potential in East Cells A, ~~and~~ B, and C would be reduced compared to baseline and Non-Project conditions because the number of years where groundwater is below the 3.3 foot threshold would increase by approximately 10-20 percent. However, WSA 2040 conditions show 37 percent (East Cell A), ~~to~~ 53 percent (East Cell B), and 68 percent (East Cell C) of the years continuing to provide groundwater elevations suitable for supporting seedling/sapling establishment and survival (i.e., groundwater less than 3.3 feet below the ground surface). Conditions suitable for seedlings/sapling survival and establishment is already intermittent in these areas. While the number of years with suitable conditions would be reduced slightly with future groundwater withdrawals, conditions are likely to remain adequate to support a multi-aged riparian system since many perennial riparian species reproduce through clones, suckers, or intermittent periods of seedling establishment every 5-10 years (Steinberg 2001). If seedling establishment occurs every 5-10 years in a 10- year period, then the number of years seedling establishment would occur would be 20 percent of all years (two years in ten). The amount of years seedling/sapling survival is available under WSA conditions for East Cells A, B, and C are greater than this 20 percent. Changes to East Cells A, ~~and~~ B, and C groundwater levels should therefore continue to allow for enough years of potential establishment and seedling/sapling survival and long-term maintenance of riparian vegetation within the upper meadow reach without restoration.

- Germination is not expected to occur in locations that do not have groundwater depths of 1.9 feet from the surface during at least two consecutive months between July and October. Based on this threshold, conditions for germination are not adequate under baseline or Non-Project conditions in West Cells A through E. Because the years of germination potential are only a few in West Cells H through J (11-18 percent) under Non-Project conditions, these areas are likely inadequate to support a black cottonwood healthy community through germination. Therefore, reduced groundwater from project and 2040 WSA conditions would not impact germination of black cottonwoods in these areas.

- West Cells F and G and all East Cells have adequate germination threshold levels in greater than 20 percent of years under Project and Non-Project conditions to support a healthy community (as noted above). The Project and 2040 WSA conditions would reduce the years of germination in West Cells F and G, East Cells A through C. 2040 WSA levels would drop West Cells F and G below the necessary 20 percent of years to support a healthy community. East Cells A through C would see a reduction in years of germination potential under Project and WSA conditions, but the number of years for adequate germination would remain suitable to support a healthy community (>20 percent of years). The reduction in East Cells C is minor and would likely not impact regeneration of cottonwoods by continuing to allow for germination in 91 percent of all years.

- As a result of these impacts, germination in areas connected hydrologically with West Cells F and G would be negatively impacted by the project and 2040 WSA conditions by increasing the number of years with unsuitable germination conditions far below baseline or Non-Project levels. Since these areas are located in the proposed restoration area, this impact may be mitigated somewhat through restoration of the channel and its increased water holding capacity.

These data show that based on these perennial vegetation requirement thresholds, groundwater withdrawals to support the Specific Plan and other development, if managed as currently modelled, ~~are unlikely to~~ has some potential to result in some mortality and degradation to selected areas of established perennial riparian vegetation within portions of the western channel ~~or upper meadow reach~~ of Squaw Creek- the areas most affected by groundwater withdrawal. The reduction of potential germination levels through groundwater decline could impact seedling recruitment in

certain areas and reduce the health of the riparian community along the streambank where seedlings of cottonwoods succeed. Sapling establishment/survival could be reduced to the point of not allowing for suitable riparian replacement or age structure around West Cells F and G. ~~However~~ The data used in this analysis does not take into account riparian vegetation that may be several feet above the creek bed. The stream channel for Squaw Creek is several feet below the surrounding ground surface in many areas, and some riparian vegetation is located along the higher elevation edges of the incised channel. The data available only shows groundwater levels compared to creek bed levels, not bank levels that may be several feet higher than the creek. While direct observations (Ascent Environmental 2013) of the creek show that most perennial riparian vegetation is at or just slightly above creek level in the areas mentioned above, this is not the case in all areas of the creek or ~~even~~ within the meadow complex itself. Therefore, it is possible that some riparian vegetation ~~within~~ along the creek in the west channel and upper east channel may die due to a drop in ground water below these thresholds, or significant degradation of seedling/sapling establishment and survival conditions could occur. Within the plan area, riparian or wetland vegetation associated with the hydrology of West Cells D through J could be affected by lowering groundwater levels, if such vegetation loses access to groundwater that is currently available to the plants during the dry months. Table 6-5 provides the acreages of sensitive habitat within the plan area that, depending on distance to groundwater levels under current and future conditions, could be affected by drops in groundwater levels. The mapped vegetation that could be negatively impacted within these affected areas would include an estimated 12.87 acres of sensitive habitats. Of this acreage, 7.66 acres would be directly affected by construction activities (e.g., grading), so up to an additional 5.21 acres could be affected solely by lowering groundwater levels. The actual acreage that could be affected would vary from year to year depending on rainfall, drought, fluctuations in groundwater, creek restoration design and other conditions, and the location of this vegetation relative to existing and future groundwater levels.

Additionally, some indirect effects such as crown dieback, reduced growth rates, or reduced foliage density may occur throughout the west channel in the Village area (West Cells E through I) and at the top of the east channel surrounding East Cells A and B. Groundwater level reduction that could result in loss or degradation of riparian habitat, a sensitive natural community specifically identified in the significance criteria listed above, and protected under Placer County policies and under the jurisdiction of the CWA, would be a potentially **significant** impact.

Table 6-5 Estimate of Potentially Affected Sensitive Habitats from Operational Groundwater Impacts within the Mapped Project Area*

Sensitive Habitat Land Cover	Total Acres Potentially Impacted by Operational Groundwater Drawdown	Acres Impacted by Construction in the Area Potentially Impacted by Operational Groundwater Drawdown	Acres Impacted by Operational Groundwater Drawdown Only (Minus Construction Acres)
Intermittent Stream	4.14	1.69	2.45
Meadow	4.09	3.42	0.67
Riparian	3.73	1.74	1.99
Seasonal Wetland	0.07	0.05	0.02
Wet Meadow	0.4	0.33	0.07
Wetland Swale	0.43	0.41	0.02
Wetland Swale/Willow Alder Scrub	0.00	0.00	0.00
Willow Alder Scrub	0.01	0.01	0.00
Total	**12.87**	**7.66**	**5.21**

* Sensitive habitat vegetation surrounding Todd Groundwater (2015) modeled groundwater cells considered potentially affected by groundwater reduction within the plan area: areas associated with West Cells E through J. This area includes meadow habitat north and south of Squaw Creek within the Plan Area.

Source: Ascent Environmental 2015

Sensitive vegetation east of the plan area could also be affected by changes in groundwater levels. As stated above, groundwater modeling shows that as a result of increased pumping, groundwater levels in East Cells A through C could drop 3 or more feet below the creek bed during the dry months more often than occurs under existing conditions. As discussed above, riparian vegetation adjacent to the creek could be affected by lowering groundwater levels. It should be noted that much of this area is sparsely vegetated under existing conditions. A baseline assessment prepared by Balance Hydrologics, Inc. conducted a reconnaissance survey of the Squaw Creek in September 2015 to characterize current conditions. That survey found that Reach 5, which encompasses East Cells A through E, was largely lacking in riparian vegetation immediately adjacent to the channel, with only approximately 10 percent of banks covered by riparian vegetation. The total width of the sparsely vegetated corridor was estimated to be 90 to 170 feet wide.[1]

Lowered groundwater elevations could also affect planting and restoration success during any creek restoration undertaken in the project area. While planned creek restoration should help sustain soil moisture and potentially higher groundwater levels (Balance Hydrologics 2014a, 2014b), no data is available to compare post-restoration groundwater levels and its impact to established perennial vegetation or natural seedling/sapling establishment. Therefore, the extent to which creek restoration would offset lowered establishment and survival of seedlings and saplings is not known.

Meadow Vegetation

The creek bed groundwater depth estimates show that annual vegetation, such as meadow vegetation, could also be affected during low water years by groundwater reduction near the upper meadow reaches of Squaw Creek nearest to the anticipated new wells. According to Stillwater Science's 2012 *A Guide for Restoring Functionality to Mountain Meadows of the Sierra Nevada - Technical Memorandum*, a functional meadow with the Sierra Nevada "supports plants that use surface water and/or shallow groundwater (generally at depths of less than one meter [3.3 feet]) at some point during the growing season." This statement includes annual and perennial plants. Meadow habitat occurs only within the northeastern portion of the plan area, with small areas of wet meadow located in proximity to West Cells I and J. Changes in groundwater elevations in this area would typically range from 0 to 3 feet during the critical period, although in some instances the changes would be more than 4 feet.

Baseline and non-project groundwater depths in the upper meadow reaches of the Squaw Creek (East Cells A-C) is generally 0-3 feet below surface during the growing season and only drops below 3.3 feet during the driest months of some years (East Cells A, B, and C). With VSVSP operations associated groundwater reduction (including 2040 WSA conditions), these cell areas would continue to have groundwater within 3.3 feet of the surface during the majority of growing season months (Todd Groundwater 2014) during most years, although the number of years that the threshold would be exceeded would increase. In the WSA 2040 conditions, the driest years (10-20 percent of years) would have seasons where groundwater levels drop below the threshold of meadow functionality for the majority of the growing season near Squaw Creek. These changes could affect timing and amount of annual seed set, mortality of individuals, and cause a shift in compositions from wet meadow vegetation to dry meadow vegetation. Additionally, they could lead to conditions in which invasive annual plants brought in by visitors become established in the meadow.

The relationship of groundwater levels to meadow vegetation, particularly the wet meadow east of the plan area, has not been established. There could be other sources of water for some or all of the wet meadow, such as the surrounding golf course. If groundwater is the primary source of water during the growing season, then a lowering of groundwater could affect the viability of meadow vegetation.

[1] Balance Hydrologics, Inc., Baseline assessment of riparian conditions and Squaw Creek baseflow, September 3, 2016 observations, September 22, 2015, page 7.

In order to address the potential extent of groundwater impacts east of the plan area, Salix Consulting, Inc. prepared a habitat map for a study area that encompasses those the portions of the meadow in proximity to East Cells A, B, and C (in order to be conservative, the study area extends past East Cell D).[2] The mapping was based on aerial photograph analysis, surveys prepared in the study area vicinity and the biologist's working knowledge of the Squaw Valley meadow. The habitats within the study area are quantified in Table 6-6. Sensitive habitats in this study area are estimated to include 10.4 acres of wet meadow, 3.3 acres of riparian and 1.9 acres of intermittent stream. The developed areas and ruderal areas are disturbed and would not be affected by groundwater levels. The golf course is irrigated. The sagebrush scrub and dry meadow habitats are composed of upland species that are better-adapted to groundwater fluctuations than wetland species are, because the upland species are not as dependent on year-round water.[3] For these reasons, the analysis focused on the wetland habitats. The study area and sensitive habitats area shown in Exhibit MM 6-1c. As discussed above, if vegetation in the sensitive habitat areas is dependent on groundwater during the growing season under existing conditions, and groundwater pumping caused those levels to decline farther than 3.3 feet from the ground surface, the functionality of the wet meadow could be adversely affected.

Table 6-6 Habitat Components East of the VSVSP Potentially Affected by Groundwater Drawdown

Components	Approximate Acreage
Golf Course	12
Dry Meadow	0.4
Riparian	3.3
Wet Meadow	10.4
Intermittent Stream	1.9
Total	**28**

Source: Salix Consulting, Inc., 2016

~~Since meadows are composed of annual plants that have adapted to variable water conditions, reduced vegetation productivity or earlier die off of annual vegetation due to lower water levels or dry years is a regular part of ecosystem function. Meadow vegetation will return during wetter years, which are the majority of years in the upper meadow reach of Squaw Creek near East Cells A and B (based on implementation of groundwater management as assumed in the modelling). Thus, impacts to meadow vegetation in the upper reaches of Squaw Creek meadows would not be substantial since any reduction in meadow vegetation or vegetation productivity during dry years would be minimal and temporary.~~

~~However, stated above with perennial riparian vegetation, the data used in this analysis does not take into account the meadow vegetation that may be several feet above the creek bed or how the groundwater levels for meadow vegetation away from Squaw Creek might be affected. While personal observations (Ascent Environmental 2013) of the creek show that most meadow vegetation is at or just slightly above creek level in the areas mentioned above, this is not the case in all areas of the creek or even within the meadow complex itself. Therefore, it is possible that some meadow vegetation along the Squaw cCreek in the upper east channel or the south of the upper east channel (West Cells may not be able to be sustained due to a drop in ground water below these thresholds.~~ As a result of the impacts described above, Plan Operations induced groundwater reduction (nearest the wells) ~~that~~ could result in loss or degradation of wet meadow habitat protected under Placer County policies and under the jurisdiction of the CWA would be a **potentially significant** impact.

[2] Salix Consulting, Inc., Potential Squaw Valley Village Groundwater Effects on Wetland Vegetation, February 18, 2016.
[3] Salix Consulting, Inc., Potential Squaw Valley Village Groundwater Effects on Wetland Vegetation, February 18, 2016, page 2.

Restoration Potential

While restoration within Squaw Creek could increase riparian and meadow habitat, potential irrigation from restoration could impact groundwater levels and further impact vegetation outside the restoration area. Irrigation for restoration of sensitive habitats would likely be most required during the period following revegetation, until the new plants are established. Additionally, after vegetation has been established, some irrigation could be needed during the driest months and driest years within the upper eastern channel of Squaw Creek and most of the western channel as described above under "Riparian Vegetation." An analysis of irrigation needs, water demand, and groundwater modelling (provided in Appendices A and B in the FEIR) conclude that vegetation within the VSVSP area and mitigation areas could be irrigated during dry periods without increasing demand on the Olympic Valley Groundwater Basin. This analysis included the calculation of potential irrigation demands for the proposed Squaw Creek restoration area and some areas of potential wetlands impacts along Squaw Creek, considering an area covering 16.1 acres. Snow-making wells located above the Olympic Valley aquifer are identified as potential source of irrigation water, if needed, to limit use of the basin aquifer. Since these wells are located in granitic fractures (spaces in the granitic rock) above, and isolated from, the modeled aquifer, additional impacts to sensitive habitats or species from use of these wells would not occur. Based on these data, the mitigation measure to irrigate 16.1 acres within parts of West cells B and D through East Cell C would not further affect groundwater or vegetation in this irrigation area.

The proposed restoration of Squaw Creek would increase the width of the creek corridor and restore the floodplain at the confluence with the Olympic channel, with the effects of increasing the riparian and wetland vegetation in that area (Balance Hydrologics 2014a, 2014b). Although no combined hydrologic and vegetation modeling has been done to support this expectation, the restoration is expected to result in a net increase in wetted habitat of 0.25 acres during low flow periods when groundwater recharge is lowest and up to 5.4 acres during high flow periods when restored floodplain areas and secondary channels become inundated (Balance Hydrologics 2014b). Additional seasonal wetland habitat is anticipated to increase by 3.2 acres within the restoration area (Balance Hydrologics 2014b) in Village area reaches of Squaw Creek; this includes riparian habitat, although acres of riparian habitat within the overall 3.2 acres of seasonal wetland increase is not identified. The expansion of meadows and riparian areas through restoration along the creek and along the Olympic Channel would enhance the functionality of the wetland system and would provide mitigation for Specific Plan impacts to existing riparian habitat, and wetlands or waters of the United States and State of California. While the amount of riparian or meadow habitat adversely affected by reduced groundwater elevation in the western or upper eastern reaches is unknown, the long-term benefits from creek restoration would offset at least some of these effects once restoration is completed.

In response to comment O8a-26, a portion of Mitigation Measure 6-1a found in the second bullet on page 6-47 of the DEIR is revised as follows:

- An annual monitoring report for a minimum period of 5 years from the date of installation, prepared by the above-cited professional, shall be submitted to the Planning Services Division for review and approval. Any corrective action shall be the responsibility of the applicant. The report shall include baseline (pre-restoration) and post-restoration measurements of suspended sediment concentration, streamflow, and turbidity as described on page 27 of the Channel Restoration Design Basis Report (Balance Hydrologics 2014).

In response to comment O9-83, Mitigation Measure 6-1a (text inserted after the fourth full paragraph on page 6-47) is revised as follows to elaborate on the content of the Mitigation and Monitoring Implementation Plan with respect to mitigating effects to waters of the United States and other wetlands:

- The Mitigation and Monitoring Implementation Plan shall, at a minimum, include the following specific criteria, standards, and information:

- Baseline locations of jurisdictional habitat including species along the western and upper eastern channel of Squaw Creek (West Cells E through J and East Cells A through D) within the plan area shall be documented before initiation of construction of the VSVSP. Conduct vegetation monitoring or additional groundwater modelling as described in Mitigation Measure 6-1c below. Any jurisdictional habitat lost within the western portion of Squaw Creek from groundwater drawdown that affects streambank instability shall be replaced with native vegetation (riparian preferably) that will stabilize the streambank and prevent sediment mobilization.

- identification of compensatory mitigation sites and criteria for selecting these mitigation sites onsite and offsite;

- in kind reference habitats within the Tahoe-Truckee region for comparison with compensatory wetlands habitats (using performance and success criteria) to document success;

- monitoring protocol, including schedule and annual report requirements (compensatory habitat shall be monitored for a minimum of five years from completion of mitigation or last human intervention [including recontouring and grading and irrigation], or until the success criteria identified in the approved mitigation plan have been met, whichever is longer);

- ecological performance standards, based on the best available science and including specifications for native wetland and riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, indicators of stress that might result in mortality, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted wetland species by the end of the five-year maintenance and monitoring period or dead and dying species shall be replaced and monitoring continued until 80 percent survivorship is achieved;

- corrective measures if performance standards are not met;

- responsible parties for monitoring and preparing reports; and

- responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions.

- The project applicant shall follow requirements outlined in the MMIP and CSRMMP for vegetation restoration success in all areas of onsite and off-site mitigation or restoration.

In response to comment O8b-36 and to further clarify the mitigation to ensure that compensation will occur in the Sierra Nevada and that there is no net loss of wetlands in the Sierra Nevada ecosystem, the following bullet is added to Mitigation Measure 6-1a after the first bullet on page 6-48 of the DEIR:

- Any offsite wetlands mitigation will occur in the Sierra Nevada bioregion and within the Tahoe-Truckee area to ensure that there is a no net loss of wetland, riparian, or wet meadow habitat within the Sierra Nevada or Tahoe-Truckee regions.

In response to comment O8b-36 and to ensure all sensitive riparian and wetland habitats (including non-jurisdictional wetland habitats) are mitigated within the region, the second bullet under Mitigation Measure 6-1b (page 6-48 of the DEIR) is revised as follows:

- The project applicant shall compensate for net permanent riparian habitat impacts at a minimum of a 1:1 ratio through contributions to a CDFW approved wetland mitigation bank in the Sierra Nevada and the Tahoe-Truckee regions or through the development and implementation of a Compensatory Stream and Riparian Mitigation and Monitoring Plan (CSRMMP) and a County approved MMIP aimed at creating or restoring in-kind habitat within the plan area and/or in the

surrounding area. Stream and riparian habitat compensation, which could be provided entirely or in part by the planned Squaw Creek restoration, shall include establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the existing riparian corridor along streams in the project site initially and then in surrounding areas. Construction activities and compensatory mitigation shall be conducted in accordance with the terms of a streambed alteration agreement as required under Section 1602 of the Fish and Game Code.

In response to comment O8b-37, Mitigation Measure 6-1b (the fourth full second-level bullet point on page 6-49 of the DEIR) is revised as follows to ensure riparian mitigation success:

- ecological performance standards, based on the best available science and including specification for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, indicators of tree stress that might result in mortality, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted riparian trees and shrubs by the end of the five-year maintenance and monitoring period or dead and dying trees shall be replaced and monitoring continued until 80 percent survivorship is achieved;

In response to multiple comments (08b-7, 08b-15, 08b-16, 08b-17, 08b-28, 08b-35, 08b-36, 08b-38, 09-61, 09-110, PH-47, etc.), Mitigation Measure 6-1c on pages 6-49 and 6-50 of the DEIR is revised as follows:

Mitigation Measure 6-1c: Implement Mitigation Measure 13-4 and monitor and respond to groundwater effects.

The project applicant shall implement Mitigation Measure 13-4, provided in Chapter 13, "Hydrology and Water Quality." Mitigation Measure 13-4 reduces the uncertainty associated with management of well system design and operation by ensuring the adoption of performance standards, thresholds, and recommendations from the WSA for well system operation, and requiring consistency with applicable groundwater plans. By confirming that groundwater management is implemented in a manner that is consistent with the operational parameters described in the WSA, Mitigation Measure 13-4 would also result in confirmation that groundwater pumping ~~does not result in losses of riparian vegetation in the west channel or upper east channel of Squaw Creek~~ and any future groundwater/vegetation impact modeling is consistent.

In addition, the project applicant shall record baseline locations and composition of species of riparian and meadow vegetation ~~along the~~ in the surrounding meadow that is hydrologically connected to the upper eastern channel of Squaw Creek (in relation to East Cells A through D) and along the western channel (in relation to West Cells E through J) before initiation of construction of the VSVSP. If sensitive plant species are found in these areas, the project proponent will follow mitigation measures outlined in Mitigation Measure 6-8 to consult with CDFW and USFWS, as appropriate depending on species status, to determine the appropriate mitigation measures for the indirect impacts that could occur as a result of project operational groundwater drawdown.

~~Where these locations are on lands not controlled by the applicant, the applicant shall seek access from the landowner to conduct monitoring. If access cannot be obtained, monitoring will be conducted via photo points or other means from the property line or other nearby publicly accessible location.~~ The extent and composition of this vegetation in the western channel and associated riparian and wet meadow areas shall be monitored annually until at least 5 years ~~final project build out~~ after the last project element is occupied, to ensure accurate recordation of responses to groundwater level declines and any beneficial effects resulting from creek restoration. Any riparian or meadow habitat lost or degraded within these areas as that is determined to be a result of project-related groundwater level declines shall be compensated for on or off-site (within the Olympic Valley preferred) at a minimum 1:1

ratio within the Sierra Nevada bioregion and the Tahoe-Truckee region, or conditions otherwise corrected, such as through irrigation of riparian ~~vegetation~~ and/or wet meadow vegetation to maintain composition and functionality of existing habitat. If monitoring shows that riparian vegetation along the streambank is not supported, other native vegetation will be planted and managed to stabilize the creek bank as per Mitigation Measure 6-1b. ~~Alternatively, groundwater modeling can be conducted that predicts conditions for riparian vegetation and meadows at a higher elevation than the Squaw Creek low flow channel (current groundwater analysis only supports an evaluation of conditions at the elevation of the low flow channel). If this modeling indicates that changes in groundwater conditions under the proposed groundwater management regime would not result in a significant adverse effect to riparian and meadow habitat, ongoing monitoring would not be needed.~~

In order to address the potential effects of groundwater pumping outside of the VSVSP area, the following steps shall be taken:

(a) Prior to recordation of the first Small Lot Tentative Map, conduct soil borings throughout the wet meadow east of the project boundary (see Exhibit MM 6-1c) to determine whether groundwater is available to wet meadow vegetation (i.e., there are no barriers to between groundwater and plant roots and/or moisture levels in the soil column indicate that groundwater is available to plant roots). Soil borings may be taken in multiple months and in successive seasons as needed to determine if a connection to groundwater is present. If groundwater is not available to the plants during the July-October period, then no further steps are necessary with respect to those areas. In these conditions, it is assumed that vegetation is receiving water from sources other than groundwater, such as golf course irrigation overspray.

(b) If soil borings indicate that groundwater is available to these plants in some or all portions of the study area east of the project boundary during July through October, then it is assumed that drops in groundwater levels could affect the viability of the plants and a monitoring plan shall be implemented, and shall include the following steps.

- Determine the minimum depth to groundwater needed during the critical period for existing habitat to maintain baseline conditions.
- Install groundwater monitoring wells in the riparian and wet meadow portions of the study area east of the project boundary where a potential connection to groundwater has been established. The location of the wells shall be based on the extent of the area that could be affected, based on part on the data collected by soil borings conducted as part of Item (a), and for which access is available. For example, if the entire wet meadow in the study area east of the project boundary is included, it is anticipated that 8 to 12 wells will need to be installed, including at least one well east of the study area. Existing and planned monitoring wells may be used, if appropriate, and permission is provided by the well operator/owner. Well locations shall be coordinated with plant survey transects.
- Collect data from the monitoring wells each year from July through October, at a minimum.
- Establish transects on a north-south heading every 50 meters or less.
- Determine the species that are located on each transect at one-meter intervals.
- Surveys shall be conducted at least once annually to determine whether the vegetation profile is changing along the transect and/or there is increased plant mortality.

Initial monitoring [as outlined in (b)] to establish baseline conditions of wet meadow vegetation and groundwater levels east of the VSVSP area shall be conducted annually for 5 years. The onset of monitoring may be coordinated with creek restoration efforts, but shall begin prior to or concurrent with recordation of the first Small Lot Tentative Map or within 2 years of project approval, whichever

occurs first. After the initial 5 years, monitoring shall be conducted every 5 years, at a minimum, until 30 percent of VSVSP development has been completed. Upon occupancy of 30 percent of the VSVSP development, monitoring shall be conducted on an annual basis until 5 years after buildout of the project.

If access cannot be gained to survey the riparian habitat and/or wet meadow and/or to install monitoring wells east of the VSVSP area, then an assessment shall be made via photo-points or other means from the property line or other nearby publicly accessible location and/or surveys of a control site with similar characteristics that is located on property that can be accessed. In order to determine whether observed changes are due to groundwater pumping, modeling methods may be used. If adverse effects are observed and can be attributed to groundwater pumping, then mitigation would be required as described below.

If monitoring and surveys indicate that riparian and/or wet meadow vegetation is being lost and/or degraded at levels that could impair the viability and value of the wet meadow and/or riparian habitat, and that change is correlated with lowered groundwater levels as indicated by monitoring wells and pumping data, one or more of the following steps shall be undertaken to ensure that there is no net loss of acreage and/or value of wet meadow habitat:

- Work with the SVPSD to adjust the pumping regime in a manner that minimizes draw down in the portion of the overall study area that is being affected;
- Irrigate the affected area during the critical period using water from a source other than the aquifer, such as fractured wells used for snowmaking at Squaw Valley;
- Provide improvements to the water system in Squaw Valley (e.g., replacement of old, leaking pipelines, replacement of high-water use fixtures) to reduce demand from other sources by an amount commensurate with the amount of irrigation water required for riparian and/or meadow vegetation. In this case, water from the aquifer could be used for irrigation of sensitive habitats; and/or
- Provide compensation for the affected area by restoring a commensurate area of wet meadow and/or riparian habitat. Preference shall be given to areas within the Squaw Valley meadow and/or in the vicinity of Squaw Creek. Contribution to the restoration efforts for Squaw Creek east of the VSVSP would be one method of compensation, because the creek restoration would improve the function of the creek, and thereby improve habitat conditions along the creek and within the meadow. If suitable land is unavailable within the Squaw Valley meadow and/or in the vicinity of Squaw Creek, then restoration activities may occur outside of Squaw Valley but within the Tahoe-Truckee area. VSVSP would be responsible for restoring that portion which is attributable to its share of increased groundwater pumping. Such compensation shall ensure that there is no net loss in the quantity or function of such habitat.

The selection of the remediation measures shall be based in part on whether the effects on riparian and/or meadow vegetation are occurring only during certain years (e.g., particularly dry years) and the period of time that remediation would be needed to ensure vegetation viability. If irrigation is used, it shall be demonstrated that the amount of water used would be within the water demand evaluated in the 2015 Water Supply Assessment or that another source of water, such as snow making wells or reducing other demand, as discussed above, could be used. As discussed previously, water could be supplied from snow-making wells located within fractured bedrock (i.e. not drawing water from the Olympic Valley aquifer) to provide irrigation for landscaping, the creek restoration area, and riparian vegetation along East Cells A through C.

To provide further clarification and in response to comment O8c-3, the second full paragraph on page 6-52 regarding impacts to Sierra Nevada yellow-legged frogs is revised as follows:

> If Sierra Nevada yellow-legged frogs are present within the Squaw Creek drainage and meadows, construction near the creek, and associated meadows and wetlands, could injure or kill adults within these and adjacent upland habitats (i.e., upland habitat within approximately 80 feet of aquatic habitat [USFWS 2013]). Grading, excavation, or other construction related activities could kill or injure individuals in this area. Construction activities could degrade aquatic habitat through increased sedimentation, contaminant releases, habitat removal, or erosion. Construction related issues that could degrade water quality have been analyzed in the document and mitigated to reduce risk in Chapter 13 and Impact 6-1. As a result, the construction activities are not anticipated to result in any violations of water quality standards or waste discharge requirements that should maintain water quality and aquatic habitat for Sierra Nevada yellow-legged frog. Creek restoration would involve the temporary disturbance of the creek channel as well as removal of riparian and meadow habitat through grading and excavating. Injury or mortality caused by construction or creek restoration would be considered take of a federally endangered species. The degradation and removal of creek and meadow habitat as a result of construction and creek restoration activities (as described and mitigated for in Impact 6-1) would ~~also~~ not be considered take, ~~if~~ because Sierra Nevada yellow-legged frogs are highly unlikely to use~~s~~ these areas due to the presence of fish and lack of suitable habitat in the project area. However, because of the potential, although remote, that dispersing frogs could occur in the project area, potential ~~T~~take of ~~individuals or loss of habitat of the~~ Sierra Nevada yellow-legged frogs from construction activities is considered ~~would be~~ a **significant** impact.

In response to comment O9-75 and to provide clarification, the discussion under Impact 6-5 (Disturbance or loss of Sierra Nevada snowshoe hare or its habitat) on pages 6-59 and 6-60 of the DEIR is revised as follows:

> Sierra Nevada snowshoe hare is designated as a species of special concern by CDFW. The species has been documented within five miles of the plan area near Lake Tahoe. In California, they are found primarily in montane riparian habitats with thickets of alders and willows, and in stands of young conifers interspersed with chaparral. The early seral stages of mixed conifer, subalpine conifer, red fir, Jeffrey pine, lodgepole pine, and aspen are likely habitats, primarily along edges, and especially near meadows. They prefer dense cover in the understory thickets of montane riparian habitats, or in shrubby understories of young conifer habitats. Locations within the plan area that might have high habitat potential would be upland riparian areas and seeps within the Village area, Squaw Creek middle and lower meadow reach, and the meadow and riparian areas in the East Parcel. The potential habitat in the Village area would not likely serve as suitable habitat due to the high amounts of disturbance from tourists and recreationalists. Therefore, the only suitable habitat in the analysis area would be located in the Squaw Creek middle and lower meadow reach, and the meadow and riparian areas in the East Parcel.
>
> ## CONSTRUCTION
>
> In the short term, activities related to construction of the Village area and the East Parcel could temporarily disturb snowshoe hare and/or their habitat located within the plan area. If snowshoe hare use the plan area for foraging or breeding, increased noise, human activities, or other factors associated with construction activities (vegetation removal, clearing, grading, building, and excavation) could temporarily disturb foraging, movement, or reproductive activities and temporarily displace individuals. Also, individuals could alter their behavior by avoiding the plan area during construction, potentially using alternative areas where they could be more susceptible to predation or other adverse effects. In addition, mortality or injury could occur as a result of collision with construction equipment, although individuals are mobile and would likely avoid active construction areas.

Sierra Nevada snowshoe hare is a potential prey species for raptors and mammal predators (e.g., coyote). Vegetation removal during construction could reduce cover and increase predation risk for this species, if it uses habitats within and near construction areas.

In addition to potential temporary effects on individuals described above, the removal of trees and vegetation ~~for the main Village area and~~ in the East Parcel~~,~~ and temporarily for the Squaw Creek restoration, would also result in the permanent or temporary loss of habitat suitable potentially suitable for snowshoe hare.

Because construction-related effects of Specific Plan implementation may cause disturbance or injury and mortality to Sierra Nevada snowshoe hare, the impact would be **significant**

OPERATIONS

Operation impacts occur in much the same area as current Squaw Valley operations. New residences and buildings will occur in areas that are already exposed to human disturbance. It is unlikely that further human activity associated with the new structures will limit potential foraging opportunities within Olympic Valley. While human traffic and noise may increase through riparian areas, meadows, and trails in the project area as a result of increased residency, the areas to be visited by people will not be substantially different from existing conditions where human disturbance already occurs. Therefore, there would likely be no change in disturbance to Sierra Nevada snowshoe hare from operational impacts. Additionally, the proposed creek restoration could increase meadow and riparian habitat (if it offsets groundwater reduction or creek restoration planting is successful with Mitigation Measures 6-1a and 6-1b) along the western portion of Squaw Creek. This could increase habitat availability for snowshoe hare around the creek in the Village area if recreational disturbance does not continue to restrict habitat use as it seems to do currently. Potentially reduced meadow or riparian vegetation in the upper meadow reaches of Squaw Creek due to ground water reduction are not likely to impact Sierra Nevada snowshoe hare habitat since the dense willow and alder areas that provide habitat for this species are located in the middle and lower portions of the meadows downstream of where groundwater effects are anticipated.

Operational impacts to snowshoe hare would be **less than significant**.

In response to comment O9-61 and to clarify that potential groundwater impacts are included in the required consultation, Mitigation Measure 6-8 (the first bullet on page 6-69 of the DEIR) is revised as follows with respect to special-status plants:

- If special-status plant species are found that cannot be avoided during construction or because of operational groundwater drawdown, the project applicant shall consult with CDFW and/or USFWS, as appropriate depending on species status, to determine the appropriate mitigation measures for direct and indirect impacts that could occur as a result of project construction and will implement the agreed-upon mitigation measures to achieve no net loss of occupied habitat or individuals. Mitigation measures may include preserving and enhancing existing populations, creation of off-site populations on project mitigation sites through seed collection or transplantation, and/or restoring or creating suitable habitat in sufficient quantities to achieve no net loss of occupied habitat and/or individuals. Potential mitigation sites could include suitable locations within or outside of the project area. A mitigation and monitoring plan will be developed describing how unavoidable losses of special-status plants will be compensated.

In response to comment F2-2, the first paragraph under Impact 6-10 (Effects of additional trail construction and improvements identified in the Specific Plan) on pages 6-74 and 6-75 of the DEIR is revised as follows:

Improvements to existing trails and construction of ~~additional trails~~ one new trail connection between existing trails outside the Specific Plan site would be implemented in the future as part of the project

applicant's overall program to meet the County's requirements for provision of recreational facilities. Trail development outside the Specific Plan site currently being considered include improvements to the Shirley Canyon and Granite Chief trails ~~and new trails on the mountain to the south of the plan area~~, a new connection between these two trails, and improvements to existing trails on the mountain to the south and west of the plan area. Specific alignments have not been identified at this programmatic level. Given that the alignments would be within habitat types identified in this EIR, no sensitive species beyond those already described would be expected to be encountered. ~~Trail c~~Construction and operation of trail improvements could result in the same environmental effects described above under Impacts 6-1 through 6-9, including tree removal; disturbances to sensitive habitats, nesting raptors, and special-status plant and animal species; and disruption of potential mule deer fawning habitat and animal movement corridors. For the same reasons described previously for Impacts 6-1 through 6-9, this would be a **potentially significant** impact.

In response to comment F2-2, Mitigation Measure 6-10 and the "Significance after Mitigation" summary on page 6-75 of the DEIR are revised as follows:

Mitigation Measure 6-10: Implement previous applicable mitigation measures during trail development.

Once a proposed alignment and the location of specific improvements are identified, a~~A~~ qualified biologist shall survey the new trail route~~s~~ and segments of existing trails identified for improvements outside the project boundary identified in this EIR to determine the biological resources present and the impacts identified within this chapter that could occur. Based on the results of this site review, the biologist shall identify mitigation measures within this chapter applicable to the specific trail route segments and the mitigation measures shall be implemented as appropriate during trail construction/improvement.

Significance after Mitigation

Implementation of Mitigation Measure 6-10 would reduce potentially significant impacts to biological resources as a result of new or additional trail improvements and operation to a **less-than-significant** level for the same reasons described for each mitigation measure included in this chapter.

2.3.7 Revisions to Chapter 7, "Cultural Resources"

In response to comment I95-1, Mitigation Measure 7-3b on page 7-22 of the DEIR is revised as follows with respect to potential effects to cultural or paleontological resources during construction:

Mitigation Measure 7-3b: Develop and implement a Worker Environmental Awareness Program.

The project applicant shall design and implement a Worker Environmental Awareness Program (WEAP) that will be provided to all construction personnel and supervisors who will have the potential to encounter and alter heritage and cultural resources. The topics to be addressed in the WEAP will include, at a minimum:

- types of heritage and cultural resources expected in the project area;
- types of evidence that indicates heritage or cultural resources might be present (e.g., ceramic shards, trash scatters, lithic scatters, mineralized, partially mineralized, or unmineralized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints);
- what to do if a worker encounters a possible resource;
- what to do if a worker encounters bones or possible bones; and

- penalties for removing or intentionally disturbing heritage and cultural resources, such as those identified in the Archeological Resources Protection Act (ARPA).

2.3.8 Revisions to Chapter 8, "Visual Resources"

For the purpose of clarity, the second paragraph under the heading "Significance after Mitigation," on page 8-50 of the DEIR is revised as follows:

> The project would be constructed in an area that is currently disturbed. The project employs substantial design guidelines that would result in a unified design consistent with a mountain setting for a resort project. The overall appearance would be attractive, for a built environment, and it would largely replace a parking lot. This would not obviate the project's contribution to blocking the scenic vistas currently available to year-round and seasonal residents of Olympic Valley, and elimination of the structures with potential to affect scenic vistas would not be feasible, given the relatively small size of the project site and the intensity of the proposed development. Conversely, increasing the height of structures on other areas of the site may restore some views from these existing buildings, but would result in visual tradeoffs, and would likely result in a development appearance that is too intensive for the mountain setting. No mitigation measures are available that would further reduce scenic vista impacts to year-round residents of the Valley or to part-time residents of adjacent timeshare and hotel condominium projects to a less-than-significant level. Therefore, Impact 8-1 would remain **significant and unavoidable** to many viewer groups, including residents, during project operation.

To correct an error, the last paragraph on page 8-52 of the DEIR is revised as follows:

> Commercial buildings and signage along the Squaw Valley Road frontage would reduce visual quality by partially blocking views of forested areas to the north; however, distant views of forested hill sides would partially retain the character of the site and surroundings (see Exhibit 8-20, Viewpoint 12). The visual character of the East Parcel development would be similar to the existing visual character of the ~~commercial and office~~ development on the south side of Squaw Valley Road that consists of two- and three-story buildings, including ~~visitor serving commercial (hotel,~~ the Tavern Inn condominium complex, the Squaw Valley Academy, the SVPSD offices and Fire Station 21~~)~~. Visitors, residents and employees driving past the site would have views that incorporate ~~commercial~~ these structures on the south and north side of the road with forested views in the background. The project would have a **potentially significant** impact on visual character and quality of the East Parcel.

2.3.9 Revisions to Chapter 9, "Transportation and Circulation"

To correct an error and in response to comment I226-21, Table 9-11 on page 9-17 of the DEIR is revised as follows:

Table 9-11 Placer County Roadway Level of Service – Existing Conditions

Segment	Type	Winter Saturday Daily Conditions		
		Average Daily Traffic	V/C Ratio	LOS
West River Street east of SR 89	Two-Lane Moderate Access Control Arterial	3,800	0.21	A
Squaw Valley Road between SR 89 and Squaw Creek Road	Three-Lane Low Access Control Arterial	12,600	0.56	A
Squaw Valley Road between Squaw Creek Road and Village Area	Two-Lane Low Access Control Arterial	12,900	0.86	D

Note: LOS = level of service; V/C ratio = volume-to-capacity ratio
Values rounded to the nearest 100 vehicles.
Source: ~~Appendix G~~ Based on comparison to values shown in Table 9-7.

To provide clarification, the significance after mitigation discussion on pages 9-58 and 9-59 of the DEIR is revised as follows:

Significance after Mitigation

Implementation of Mitigation Measure 9-2a through 9-2d would reduce this impact to a **less-than-significant** level for all intersections within the plan area, except the Squaw Valley Road/Village East Road intersection, because these measures would restore operations to acceptable levels.

The traffic management procedures described above at the Squaw Valley Road/Far East Road/Christy Hill Road, Squaw Valley Road/Wayne Road, and Squaw Valley Road/Squaw Creek Road intersections were analyzed to determine how the level of service would change. With the use of traffic management personnel, the Squaw Valley Road/Wayne Road and Squaw Valley Road/Squaw Creek Road intersections would operate similar to a two-phased signalized intersection. Traffic conditions would be improved at the Squaw Valley Road/Far East Road/Christy Hill Road intersection by restricting turning movements on Far East Road during peak periods. Based on the existing plus project traffic volumes and anticipated right-of-way allocations, these intersections would operate at LOS C or better with traffic management.

However, after implementation of the mitigation measures provided above, the Squaw Valley Road/Village East Road intersection would continue to experience increases in delays in excess of 2.5 seconds. As discussed above, adoption of Policy CP-1 within the VSVSP would allow for an LOS F standard for intersections within the plan area during peak ski/occupancy days and would therefore make peak hour/day traffic conditions at the Squaw Valley Road/Village East Road intersection acceptable. However, this impact would be considered **significant and unavoidable** for the Squaw Valley Road/Village East Road intersection unless and until Policy CP-1 is adopted.

Due to a changed and improved condition since publication of the DEIR, Impact 9-3 and Mitigation Measure 9-3 on page 9-59, and the "Significance after Mitigation" summary on page 9-61 of the DEIR are revised as follows:

Impact 9-3: Impacts to Caltrans intersections.

The proposed project would exacerbate unacceptable operations at the SR 89/Alpine Meadows Road intersection during all three analysis peak hours. This would be a **significant** impact. Since publication of the DEIR, the planned traffic signal at the SR 89/Alpine Meadows intersection has been constructed and is operational. Therefore, the project would not generate sufficient vehicle trips to generate an increase in intersection delay of more than 2.5 seconds, and this impact would be **less than significant**.

As shown in Table 9-21, the proposed project would add vehicle trips to various Caltrans-maintained intersections along SR 89; however, operations would remain at an acceptable LOS D or better at each location. This applies to the following intersections:

- SR 89/Donner Pass Road
- SR 89/I-80 WB Ramps
- SR 89/I-80 EB Ramps
- SR 89/Deerfield Drive
- SR 89/West River Street
- SR 89/Squaw Valley Road
- SR 89/SR 28

Therefore, under the Existing Plus Project condition, the proposed project would not generate a significant adverse effect at these intersections related to changes in LOS or delays.

Table 9-21 shows that vehicle trips generated by the proposed project would add traffic to the SR 89/Alpine Meadows Road intersection, which currently operates at LOS F during the winter Saturday a.m., winter Sunday p.m., and summer Friday p.m. peak hours. The project would cause the delay to increase by 96 seconds or more for each of these peak hours. Because these increases are greater than the 2.5-second increase threshold, these degradations would be **significant**.

The DEIR included Mitigation Measure 9-3, which required the County and Caltrans to construct the planned traffic signal at the SR 89/Alpine Meadows intersection. Construction occurred in 2015, after publication of the DEIR. Now that this traffic signal is in place, operations are expected to improve to an acceptable LOS D or better during all three analysis periods, and no mitigation would be required of the project. Because the planned traffic signal at the SR 89/Alpine Measures intersection has been constructed and is operational, and the project would not generate sufficient vehicle trips to generate an increase in intersection delay of more than 2.5 seconds, this impact would be **less than significant**.

~~Mitigation Measure 9-3: Construct the planned traffic signal at the SR 89/Alpine Meadows intersection.~~

~~Placer County has been working with Caltrans to construct a traffic signal at this intersection. Squaw Valley does not have a role in construction of this traffic signal. Although the precise timing of the signal's installation is not known at this time, the plans and specifications have been approved by the Placer County Board of Supervisors and the contract for construction has been awarded as of April 2015. It is anticipated to be constructed by the County and Caltrans in 2015 and be completed in one construction season. Once this traffic signal is in place, operations would improve to an acceptable LOS D or better during all three analysis periods, and no mitigation would be required of the project.~~

Mitigation Measures

No mitigation is required.

~~**Significance after Mitigation**~~

~~Impact 9-3 would be considered **significant and unavoidable** in the short term if the planned traffic signal at the SR 89/Alpine Measures intersection is not constructed prior to the proposed project generating sufficient vehicle trips to generate an increase in intersection delay of more than 2.5 seconds. However, once the signal is operational, the effect of added vehicle trips from the proposed project would be **less than significant**.~~

In response to comment O13-1 and as revised by the County Department of Public Works, the title and text of Mitigation Measure 9-7 in Table 2-2, "Summary of Impact and Mitigation Measures," on page 2-52 of the DEIR is revised as follows:

Mitigation Measure 9-7a: Contribute fair share or create a Community Service Area (CSA) or a Community Facilities District (CFD) to cover increased transit service.

The project applicant shall commit to providing fair share funding to ~~TART or forming~~ the Department of Public Works and Facilities (DPW&F) or create a Community Service Area (CSA) or a Community Facilities District (CFD) to fund the costs of increased transit services ~~prior to the recordation of the Initial Large Lot Final Map~~. ~~The provisions for monitoring (discussed below), and determining the appropriate fair share or the steps for forming a CSA or CFD shall be determined at this time in consultation with, and to the satisfaction of TART and County staff.~~ An Engineer's Report shall be complete prior to recordation of any Small Lot Final Map to the satisfaction of DPW&F to define the fair share or used for the creation of the CSA or CFD. If and when a CSA or CFD is formed, the project applicant shall no longer be responsible for making fair share payments to DPW&F for the increased transit service for the portion of the project covered by the CSA or CFD.

~~Prior to recordation of the Initial Small Lot Final Map, the project applicant shall work with TART to conduct winter and summer season monitoring of ridership on bus routes to/from, and within Olympic Valley. Written evidence of this monitoring, its results, and any comments from TART shall be provided to Placer County ESD and DPW. When ridership approaches capacity, and based on the previously agreed upon provisions, the project applicant shall make a fair share contribution to TART to support transit service, or create a CSA or a CFD to fund the costs of increased transit services. If and when a CSA or CFD is formed, the project applicant shall no longer be responsible for making fair share payments to TART, and TART shall be fully responsible for adjusting bus service.~~

This mitigation measure meets the intent of Specific Plan Policies CP-2 through CP-4, and clarifies how the project would contribute to enhanced transit operations. Increased service may consist of more frequent headways, longer hours of operations, and/or different routes. The fee calculations shall consider both capital expenses and on-going operations and maintenance expenses.

In response to comment O13-1, new Mitigation Measure 9-7b is added to page 9-66 of the DEIR as follows:

Mitigation Measure 9-7b: Maintain Membership in the Truckee North Tahoe Transportation Management Association (TNT/TMA).

The following mitigation measure, while not required to achieve or maintain a less-than-significant impact conclusion, would further reduce the project's impacts to transit.

Prior to approval of improvement plans/final maps, the project applicant shall maintain membership in perpetuity in the Truckee North Tahoe Transportation Management Association (TNT/TMA). Once commercial and homeownership groups have been formed, the project applicant shall shift the TNT/TMA membership to the associations and the associations shall maintain membership in perpetuity. It is not anticipated that membership will need to be cancelled; however, if for a reason unknown at this time cancellation of the membership is required, it shall be mutually agreed to by the County and the entity responsible for paying the annual dues.

In response to comment O13-1, the "Significance after Mitigation" summary on page 9-66 of the DEIR is revised as follows:

Significance after Mitigation

Implementation of Mitigation Measures 9-7a and 9-7b would reduce this impact to a **less-than-significant** level because the creation of the CSA/CFD to provide additional funding and the project applicant's continued membership in the TNT/TMA would ensure that increased TART service would be supported.

In response to comment L6-9, Mitigation Measure 9-8 on page 9-67 of the DEIR is revised as follows:

Mitigation Measure 9-8: Develop a Construction Traffic Management Plan.

Prior to recordation of the first Small Lot Final Map, the project applicant shall prepare a Construction Traffic Management Plan (CTMP) to the satisfaction of the Placer County Department of Public Works and the Engineering and Surveying Division. The plan shall include (but not be limited to) items such as:

- guidance on the number and size of trucks per day entering and leaving the project site;
- identification of arrival/departure times that would minimize traffic impacts;
- approved truck circulation patterns, including coordination with the Town of Truckee if the aggregate mine in the Town is used as a material source;
- locations of staging areas;

- locations of employee parking and methods to encourage carpooling and use of alternative transportation;
- methods for partial/complete street closures (e.g., timing, signage, location and duration restrictions);
- criteria for use of flaggers and other traffic controls;
- preservation of safe and convenient passage for bicyclists and pedestrians through/around construction areas;
- monitoring for roadbed damage and timing for completing repairs;
- limitations on construction activity during peak/holiday weekends and special events;
- preservation of emergency vehicle access;
- coordinate with applicants of other projects under construction concurrently in Olympic Valley to minimize potential additive construction traffic disruptions, avoid duplicative efforts (e.g., multiple occurrences if similar signage), and maximize effectiveness of traffic mitigation measures (e.g., joint employee alternative transportation programs);
- removing traffic obstructions during emergency evacuation events; and
- providing a point of contact for Olympic Valley residents and guest to obtain construction information, have questions answered, and convey complaints.

The CTMP should be developed such that the following minimum set of performance standards is achieved throughout project construction. It is anticipated that additional performance standards will be developed once details of more project construction are better known.

1) Delivery trucks do not idle/stage on Squaw Valley Road.
2) Squaw Valley Road does not feature any construction-related lane closures on peak activity days.
3) All construction employees shall park in designated lots owned or leased by Squaw Valley Resort.
4) Roadways, sidewalks, crosswalks, and bicycle facilities shall be maintained clear of debris (e.g., rocks) that could otherwise impede travel and impact public safety.

2.3.10 Revisions to Chapter 10, "Air Quality"

In response to comment L2-2, the bulleted items in Section 10.3.1, "Significance Criteria" on page 10-11 of the DEIR are revised as follows:

As stated in Appendix G of the State CEQA Guidelines, the significance criteria established by the applicable air district may be relied on to make the above determinations. Thus, as identified by PCAPCD, an air quality impact also is considered significant if implementation of the proposed project would result in:

- a net increase in short-term construction-related or long-term operation-related (regional) emissions of ROG, NOX, or PM10 that exceed the project-level threshold of 82 pounds per day (lbs/day) (PCAPCD 2012:2-2). The thresholds of 82 lbs/day are based on the limit of 15 tons per year that is mandated for permitting of individual stationary sources of emissions (e.g., factories, industrial facilities, gasoline stations) by the New Source Review program (PCAPCD Rule 502).

One objective of the New Source Review program is to ensure that air quality is not significantly degraded from the addition of new and modified industrial sources (PCAPCD 2012:2-2 and 2-3). ~~Therefore, Placer County considers the thresholds of 82 lbs/day to represent the allowable incremental contribution of a land use development project while still progressing toward overall attainment within Placer County~~; ~~and/or~~

- a net increase in long-term operation-related (regional) emissions of ROG or NO_X that exceed the cumulative threshold of 10 pounds per day (lbs/day) (PCAPCD 2012:2-3). PCAPCD established this cumulative threshold based on the requirement of Rule 502 ("New Source Review") that any stationary source that emits more than 10 lbs per day of ROG and NOx must employ best available control technology (PCAPCD 2012:2-3 and 2-4). Therefore, Placer County considers the threshold of 10 lbs/day to represent the acceptable incremental contribution of a land use development project while still progressing toward overall attainment within Placer County; and/or

- exposure of sensitive receptors to TAC emissions that would exceed 10 in 1 million for the carcinogenic risk (i.e., the risk of contracting cancer) or a noncarcinogenic Hazard Index of 1 for the maximally exposed individual (PCAPCD 2012:E-3).

In response to DEIR comments regarding air quality emissions associated with the upgrade to the existing approximately 1.87-mile-long sewer line between the existing Village and SR 89 (see the Master Response regarding construction emissions), Table 10-4 on page 10-14 of the DEIR is revised as follows to include emissions of CAPs and precursors associated with the upgrade to the sewer line:

Table 10-4 Summary of Maximum Daily Emissions of Criteria Air Pollutants and Precursors Associated with Project Construction Activities (Revised)[1]

Construction Activity	ROG (lb/day)	NO_X (lb/day)	PM_{10} (lb/day)	$PM_{2.5}$ (lb/day)
Village and East Parcel[2]				
Demolition	1.0	9.3	0.6	0.5
Site Preparation	1.1	11.0	1.6	1.1
Grading	1.1	11.0	2.1	1.2
Paving	1.4	15.0	0.3	0.2
Building Construction	0.6	4.5	3.6	1.3
Architectural Coatings	9.6	12.7	0.6	0.2
Upgrade to Utility Line Connection[3]	3.2	20.1	6.4	2.3
Total Maximum Daily Emissions	~~32.2~~ 35.4	~~53.3~~ 73.4	~~8.9~~ 15.3	~~4.5~~ 6.8
PCAPCD Thresholds of Significance	82	82	82	NA

Notes:
ROG = reactive organic gases
NO_X = oxides of nitrogen
PM_{10} = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less
$PM_{2.5}$ = respirable particulate matter with an aerodynamic diameter of 2.5 micrometers or less
lb/day = pounds per day
PCAPCD = Placer County Air Pollution Control District

~~Modeled values represent maximum daily emissions that could occur if up to 20 percent of the land uses are under construction during any single year. See Appendix H for detail on model inputs, assumptions, and project specific modeling parameters.~~

[1] See Appendix H for detail on model inputs, assumptions, and project specific modeling parameters.

[2] Emissions from the construction of proposed facilities in the Village and at the East Parcel were estimated using CalEEMod Version 2013.2 (SCAQMD 2013). Modeled values for the construction of facilities at the Village and East Parcel represent maximum daily emissions that could occur if up to 20 percent of the land uses were under construction during any single year.

[3] Construction emissions from the utility line upgrade were estimated using the Roadway Construction Emissions Model, Version 7.1.5.1 (SMAQMD 2015).

Source: Modeling conducted by Ascent Environmental in ~~2014~~ 2015

To correct a grammatical error, the second paragraph on page 10-15 of the DEIR is revised as follows:

> Fugitive dust PM_{10} and $PM_{2.5}$ emissions would also be minimized due to implementation of the dust control measures required by PCAPCD Rule 228, including measures that minimize track-out on to paved public roadways, limiting vehicle travel on unpaved surfaces to 15 mph, and stabilization of storage piles and disturbed areas. Short-term construction-generated emissions would not exceed PCAPCD's significance thresholds for ROG, NO_X, or PM_{10}, and; thus, would not be expected to contribute to pollutant concentrations that exceed the NAAQS or CAAQS. Because construction-generated PM_{10} emissions would be less than the applicable threshold of 82 lbs/day, and because $PM_{2.5}$ is a subset of PM_{10}, it is not anticipated that construction activity would result in concentrations of $PM_{2.5}$ that would violate or substantially contribute to a violation of the ambient air quality standards for $PM_{2.5}$. This impact would be **less than significant**.

In response to comment L2-2, Mitigation Measure 10-2 beginning on pages 10-17 and 10-18 of the DEIR is revised as follows with respect to PCAPCD's thresholds:

Mitigation Measure 10-2: Implement an ongoing ROG and NO_X emissions review and reduction program.

This measure is designed to reduce the project's operational emissions of ROG or NOx to less than PCAPCD's project-level threshold of 82 lbs/day and to less than PCAPCD's cumulative threshold of 10 lbs/day.

Mitigation measures for reducing operational emissions of ozone precursors were developed using PCAPCD guidance (PCAPCD 2012:C-1 through C-2) and mitigation guidance published by the California Air Pollution Control Officers Association (CAPCOA 2010) and the California Attorney General's Office (2010). The Lake Tahoe Sustainability Collaborative's *Sustainability Action Plan* was also reviewed for mitigation options as it includes multiple emission reduction measures that are well-suited to the climate and development patterns in the Sierra Nevada (Lake Tahoe Sustainability Collaborative 2013:4-1 through 4-37).

Prior to recordation of each Small Lot Final Map, the project applicant shall prepare, to the satisfaction of Placer County Planning Services Division and PCAPCD, a chart or table with supporting analysis, which demonstrates that construction and operation of the proposed phase, combined with emissions from all past approved phases, will not result in ROG or NO_X emissions in excess of ~~82~~ 10 lbs/day. Compliance with this threshold may be achieved through project design and/or other "on-site" measures, which may include any of the project-level reduction measures listed below. Alternatively, the project applicant may demonstrate compliance with this mitigation measure, partially or wholly, through off-site measures (i.e., emission reductions not directly associated with the proposed project but funded/implemented by the applicant, such as reducing emissions associated with ski operations) and/or purchase of offset credits identified below.

Placer County Planning Services Division shall maintain a file for the charts to provide future applicants with the historical emissions record and approved tracking methodology.

The project applicant shall be responsible for the funding and implementation of all identified reduction measures. The ROG and NO_X reduction benefits achieved by all measures must occur during the ozone season (May through October). The method used to quantify the reduction or offset amount achieved by each measure must be approved by the County and PCAPCD.

Subsequent to the implementation of all selected reduction measures, the project applicant shall evaluate and report the effectiveness of the measures annually to the County and PCAPCD to verify that the suite of measures result in the combined reduction in ROG and NO_X that was expected. This annual reporting shall be completed and submitted to the County and PCAPCD within 30 days of the end of each ozone season. If it is determined that the effectiveness of reduction measures has been

overestimated, then additional reduction measures must be implemented. Similarly, if it can be verified that reduction measures achieve better than anticipated results, or previous emission estimates were above actual emission levels, the overall emission reduction approach can be adjusted accordingly.

Types of reduction and offset measures implemented by the project applicant may include, but are not limited to, the measures listed below, so long as the combination of selected measures results in calculated emissions below the target threshold. Note that not all of these measures need to be implemented; rather, the project applicant will be required to implement a combination of those measures needed to reduce ROG and NO_X emissions below the ~~82~~ 10 lbs/day threshold:

In response to comment L2-3, Mitigation Measure 10-2 on pages 10-17 through10-21 of the DEIR is revised as follows with respect to reactive organic gases (ROG) and oxides of nitrogen (NO_X):

OFFSET MEASURES

- Establish mitigation off-site within the portion of Placer County that is within the MCAB by participating in an off-site mitigation program, coordinated through PCAPCD. Examples include, but are not limited to retrofitting, repowering, or replacing heavy duty engines from mobile sources (e.g., busses, construction equipment, on-road haulers, boilers, ski lift equipment, grooming equipment); or other programs that the project proponent may propose to reduce emissions.

- Participate in PCAPCD's Off-site Mitigation Program by paying the equivalent amount of fees for the project's contribution of ROG and NO_X that exceeds the 82 lbs/day. The applicable fee rates changes over time. At the time of writing this EIR, the fee rate is ~~$17,720~~ $18,030 per ton emitted during the ozone season. The actual amount to be paid shall be determined, and satisfied per current California Air Resource Board guidelines, at the time of recordation of the Final Map (residential projects), or issuance of a Building Permit (non-residential projects).

In response to comment L2-1, Mitigation Measure 10-2 on pages 10-17 through10-21 of the DEIR is revised as follows:

CONSTRUCTION MEASURES

- Cease or substantially limit ROG- and NO_X–generating construction activity during peak operations (i.e., peak occupancy periods) of buildings and facilities that are already built and operational under the Specific Plan.

- Prior to approval of Grading or Improvement Plans, whichever occurs first, the applicant shall submit a Construction Emission/Dust Control Plan to PCAPCD. The applicant shall deliver approval from the PCAPCD to the Placer County Planning Services Division.

2.3.11 Revisions to Chapter 11, "Noise"

In response to DEIR comments regarding potential construction noise at Squaw Valley Academy, a boarding school near the East Parcel site (see the Master Response regarding noise), the third full paragraph on page 11-19 of the DEIR is revised as follows:

Existing sensitive receptors that would be exposed to construction-noise include lodging units at the Intrawest Village and Red Wolf Lodge, The Olympic Village Inn, Squaw Valley Chapel, Squaw Valley Lodge, and other scattered residences located around the project site, such as the residences on Indian Trail Court adjacent to the East Parcel, the Tavern Inn Condominiums located at Squaw Valley Road and Tavern Way, and the Squaw Valley Academy across Squaw Valley Road from the East

Parcel (approximately 250 feet between the closest academy buildings and construction activities). Construction activity (e.g., demolition, site preparation, grading, and building construction) could potentially occur at or within 50 feet of most of these existing sensitive receptors, and as close as 250 feet from the Academy for construction of the proposed market. The employee housing development on the East Parcel would be developed in modules, in response to project demands for employees, and is expected to last 24 to 30 months within the total 25-year timeframe over which the project would be constructed. Daytime noise levels could be as high as 85 dB at the exterior of the Academy buildings for short periods during construction at the East Parcel, which could result in disruptive noise within classrooms. In addition, as the Specific Plan is developed over the years, new sensitive land uses would be constructed and potentially occupied while construction continues and; therefore, exposing these new on-site receptors to the same noise levels. Thus, anticipated daytime construction activities could result in noise levels that exceed Placer County's daytime (i.e., 7:00 a.m. to 10:00 p.m.) exterior noise standards of 55 dBA L_{eq} / 70 dBA L_{max} and nighttime (i.e., 10:00 p.m. to 7:00 a.m.) interior standards of 45 dBA L_{eq} /65 dBA L_{max} and could result in a temporary increase in noise levels in excess of 5 dB.

In response to DEIR comments regarding potential construction noise at Squaw Valley Academy, a boarding school near the East Parcel site (see the Master Response regarding noise), Mitigation Measure 11-1a on page 11-20 of the DEIR is revised as follows:

Mitigation Measure 11-1a: Implement construction-noise reduction measures.

To minimize noise levels during construction activities, construction contractors shall comply with the following measures during all proposed construction work:

- All construction equipment and equipment staging areas shall be located as far as possible from nearby noise-sensitive land uses.
- All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- All construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. The self-adjusting backup alarms shall automatically adjust to 5 dBA over the surrounding background levels. All non self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels. In addition to the use of backup alarms, the construction contractor shall consider other techniques such as observers and the scheduling of construction activities such that alarm noise is minimized.
- Individual operations and techniques shall be replaced with quieter procedures (e.g., using welding instead of riveting, mixing concrete off-site instead of on-site) where feasible and consistent with building codes and other applicable laws and regulations.
- When existing and future noise sensitive uses are within close proximity to prolonged construction noise, noise attenuating buffers such as structures, truck trailers, temporary noise curtains or sound walls, or soil piles shall be located between noise sources and the receptor to shield sensitive receptors from construction noise.
- Construction on the East Parcel shall be designed to avoid intrusive noise, defined as an interior noise level of 45 dBA L_{eq} /65 dBA L_{max} or greater, during the time when classroom activities take place at the Squaw Valley Academy. The applicant shall coordinate with administrators at the academy and shall achieve these performance standards either by adjusting the timing of construction, adjusting construction methods during times of classroom instruction, temporary screening, and/or improving noise attenuation at the school by replacing windows, increasing

insulation, etc., as needed. The applicant shall prepare and submit to Placer County an acoustical study that demonstrates these criteria will be met prior to approval of each Small Lot Tentative Map for all construction on the East Parcel.

- The project applicant shall sponsor and create a website that includes information on construction activities and includes when, where, and for how long noise generating construction activities would occur. In addition, prior to the beginning of each construction season written notification of construction activities shall be provided to all noise-sensitive receptors located within 2,500 feet of construction activities. Additional notifications may be provided if there are substantive changes in construction operations or noise generating activities (e.g., need for nighttime construction, special notice for blasting). Notification shall include anticipated dates and hours during which construction activities are anticipated to occur and contact information, including a daytime telephone number, for the project representative to be contacted in the event that noise levels are deemed excessive.

In response to DEIR comments regarding traffic noise impacts to existing sensitive receptors along Squaw Valley Road (see the Master Response regarding noise), Mitigation Measure 11-5 on page 11-33 of the DEIR is revised as follows:

~~Mitigation Measure 11-5: Reduce transportation noise exposure to sensitive receptors.~~

~~For new sensitive receptors developed as part of the proposed project and that would be located within 170 feet of the centerline of Squaw Valley Road (i.e., the distance from the centerline that is estimated, based on the noise modelling, to result in exceedance of the Placer County transportation-related exterior noise standard of 60 dBA L_{dn}), the following design criteria shall be adhered to:~~

- ~~Building materials and design shall be used that achieve, at a minimum, 25 dBA of exterior to-interior noise attenuation. In all cases, interior noise levels comply with the Placer County interior noise standard of 45 dBA L_{dn}.~~

Mitigation Measure 11-5: Reduce roadway noise levels on Squaw Valley Road.

To reduce noise levels associated with increased traffic on Squaw Valley Road, the project applicant shall install a rubberized hot mix asphalt overlay (RHMA) or equivalent surface treatment with known noise reducing properties on top of the existing conventional asphalt of Squaw Valley Road along the segment identified below. Sufficient project generated traffic resulting in a significant contribution to the exceedance of noise standards does not occur until the later portions of project implementation. Therefore, the RHMA overlay need not be installed immediately at project initiation. The RHMA overlay shall be installed when development reaches 30 percent of all proposed Hotel/Condo/Cabin Units Land uses (i.e.,255 units or more), which would be the point where current modeling indicates traffic noise may exceed standards. The RHMA overlay shall meet the following conditions:

- A RHMA overlay shall be installed on top of the existing conventional asphalt on Squaw Valley Road beginning at its' intersection with SR 89 and terminating at its intersection with Christy Lane.

- The RHMA overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4-6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to current noise levels.

- Prior to installation of any RHMA overlay, the applicant shall hire a qualified acoustical engineer to review all design parameters to ensure that the RHMA design is adequate, based on most current technology, practices, and availability of products, such that, at a minimum, 4 dB in noise reduction relative to conditions without a RHMA overlay would be achieved.

In response to DEIR comments regarding traffic noise impacts to existing sensitive receptors along Squaw Valley Road (see the Master Response regarding noise), Mitigation Measure 11-5 was revised, above, to require the installation of an RHMA on top of the existing conventional asphalt of a segment of Squaw Valley Road. The conclusions regarding significance after mitigation on page 11-33 of the DEIR are revised as follows from significant and unavoidable to less than significant after mitigation:

Significance after Mitigation

~~Implementation of Mitigation Measure 11-5 would reduce exposure of traffic generated noise at new sensitive receptors. However, as described below, no feasible mitigation is available for existing sensitive receptors.~~

~~Existing sensitive receptors are located within the 60 dBA L_{dn} noise contour of Squaw Valley Road and would continue to be exposed to noise levels that exceed Placer County noise standards (i.e., 60 dBA L_{dn}). Further, during the summer, noise along Squaw Valley Road would increase such that in some locations where modelling indicates existing conditions are in compliance with Placer County exterior noise levels, the addition of project generated transportation noise would result in exceedance of the 60 dBA L_{dn} standard for transportation noise. Exterior noise levels at existing noise sensitive residences could only be remediated by relocating roadways, building sound walls, relocating sensitive receptors, etc., but in the case of the project, this would not be feasible. Homes are located adjacent to the roadway edge and relocating the road would require removal of homes, or if moved in the other direction, would result in loss of habitat and other potential impacts. In most locations the homes are too close to the roadway to add sound walls without affecting safe access to the road (line of sight would be compromised) or views. Further, it is likely that interior noise is within standards of 45 dBA L_{dn}, given the colder climate and likelihood that most (or all) homes already have dual pane windows and insulation. Typical construction of this type provides at least 25 dB exterior to interior attenuation. Therefore, exterior noise levels would need to be at least 71 dBA for the interior noise standards to be exceeded, which would mean that an existing residence would need to be located 20 feet from the centerline of Squaw Valley Road, and this does not currently occur. Nonetheless, existing sensitive land uses (i.e., residences located within the 60 dBA L_{dn} noise contour of Squaw Valley Road) would be exposed to exterior noise levels during days with peak traffic conditions that exceed applicable Placer County noise standards. This impact would remain **significant and unavoidable**.~~

~~Implementation of Mitigation Measure 11-5 would reduce interior noise exposure from Squaw Valley Road at new sensitive receptors by designing buildings such that interior noise levels would comply with Placer County noise standards. As described in the *Placer County General Plan*, if all available noise reducing measures have been implemented, the exterior noise level at the outdoor activity area may be 65 dBA L_{dn}, provided that interior noise standards are met (see Table 11-7). The 65 dBA L_{dn} noise contour is located 80 feet from the centerline of Squaw Valley Road. As per the Illustrative Concept Plan included in the VSVSP, no new development is proposed within 80 feet of the centerline of Squaw Valley Road and therefore would not be exposed to exterior noise levels that exceed 65 dBA L_{dn}. Further, an exterior to interior reduction of 25 dBA would ensure that any new sensitive receptors located within the 60 dBA (170 feet), the 65 dBA (80 feet) or the 70 dBA (40 feet) noise contour from the centerline of Squaw Valley Road would not exceed the interior noise standard of 45 dBA L_{dn}. Impacts to new sensitive receptors from traffic noise would be reduced to a **less than significant** level.~~

Implementation of Mitigation Measure 11-5 would result in a reduction of 4-6 dB along Squaw Valley Road, which would be a clearly noticeable reduction to nearby sensitive receptors. Assuming the more conservative value of 4dB, this reduction would reduce the 60 dBA noise contour associated with Squaw Valley Road from 170 feet to approximately 92 feet. Further, given that the highest noise increase associated with the project is 4.4 dBA L_{dn} (see Table 11-11); this reduction in noise would reduce any increase associated with project-generated traffic to less than 1 dB, which is not perceptible.

Although some residences are located within 92 feet of Squaw Valley Road and therefore still exposed to exterior noise levels above (slightly) 60 dBA, the overall effect of the mitigation would minimize noise exposure, and would reduce it to a point that any increase generated by the proposed project would be imperceptible. With regards to noise levels on SR 89, as described above, noise increases during both the winter and summer as a result of the project would not be noticeable.

Thus, the project would not result in a substantial long-term increase in noise to existing sensitive receptors and this impact would be reduced to a **less-than-significant** level.

As described above, with implementation of Mitigation Measure 11-5, the 60 dBA contour would be reduced from 170 feet to 92 feet from the centerline of Squaw Valley Road. As per the Illustrative Concept Plan included in the VSVSP, no new development is proposed within 92 feet of the centerline of Squaw Valley Road and therefore no new receptors would be exposed to exterior noise levels that exceed 60 dBA L_{dn}.

With regards to interior noise levels, typical construction of a building with a wood frame and stucco or wood sheathing would provide, at a minimum, a 25 dB exterior-to-interior noise reduction with its windows closed (Caltrans 2002). Newly built residences would be constructed to comply with all current California and Placer County building codes, which require dual pane windows to meet energy efficiency standards. As such, newly constructed residences would likely achieve a higher exterior-to-interior noise reduction than 25 dB. Nonetheless, assuming the minimum reduction of 25 dB, a new sensitive receptor would need to be exposed to exterior noise levels of greater than 70 dBA L_{dn} for interior noise standards of 45 dBA L_{dn} to be exceeded. The 70 dBA L_{dn} noise contour with Mitigation Measure 11-5 would be 20 feet from the centerline of Squaw Valley Road. No new residences would be located this close to Squaw Valley Road and therefore no new receptors would be exposed to interior noise levels that exceed 45 dBA L_{dn}. Impacts to new sensitive receptors from traffic noise would be reduced to a **less-than-significant** level.

2.3.12 Revisions to Chapter 12, "Soils, Geology, and Seismicity"

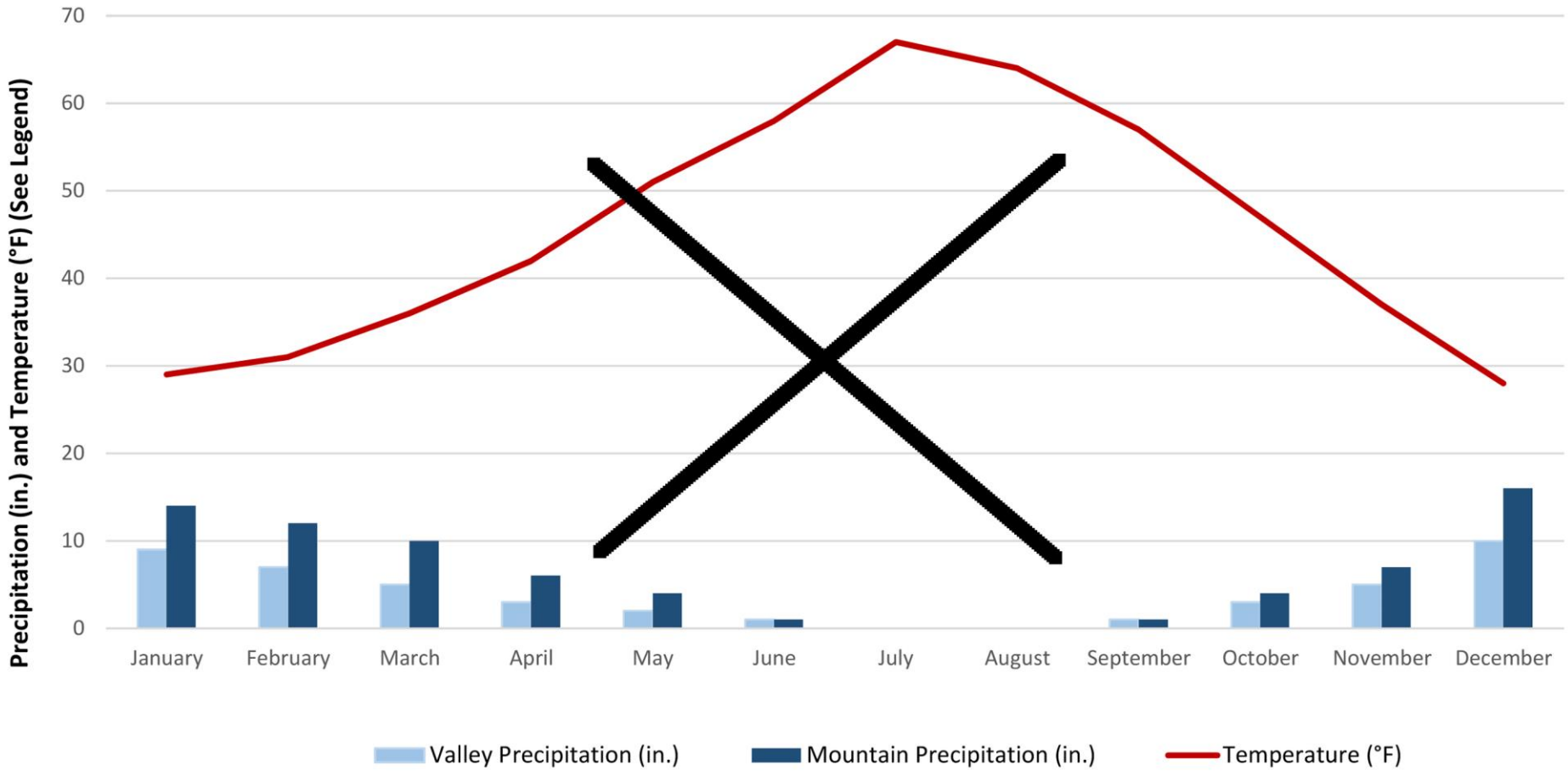
None

2.3.13 Revisions to Chapter 13, "Hydrology and Water Quality"

In response to comments O8a-2 and O8a-4b, Exhibits 13-3 and 13-4 on pages 13-6 and 13-8, respectively, of the DEIR are revised to reflect the incremental precipitation for the SNOTEL Gold Coast Squaw Valley station.

In response to comment O8a-4b, the first paragraph on page 13-7 of the DEIR is revised as follows to address the correct SNOTEL precipitation and recent valley floor precipitation records:

> In addition to the distinct seasonal patterns of temperatures and precipitation, conditions also vary year to year as a result of regional weather conditions. Furthermore, the nearly 3,000 foot elevation difference between the valley floor (~6,200 feet) and ridge crests (~9,000 feet) produces local climate diversity. The average total annual precipitation on the valley floor is 47 inches, while the average for surrounding mountains is ~~263~~76 inches ~~(expressed as "snow in water equivalent" meaning the inches of water both as rain and if all snow were melted)~~, and both of these precipitation values represent combined measured precipitation as snowfall and rainfall (Exhibit 13-4). The year-to-year variability in total precipitation for the valley and mountains is large relative to its average~~, while the variability of total precipitation (including snow in water equivalent) on the mountain is extreme (a minimum around 120 inches and a maximum over 500 inches)~~. The pattern of years with high versus low precipitation is not consistent for the mountain and valley locations (Exhibit 13-4), which has mixed effects on surface runoff production and groundwater recharge potential.



Source: Cardno 2015, using data from Farr West Engineering and Others, July 2015

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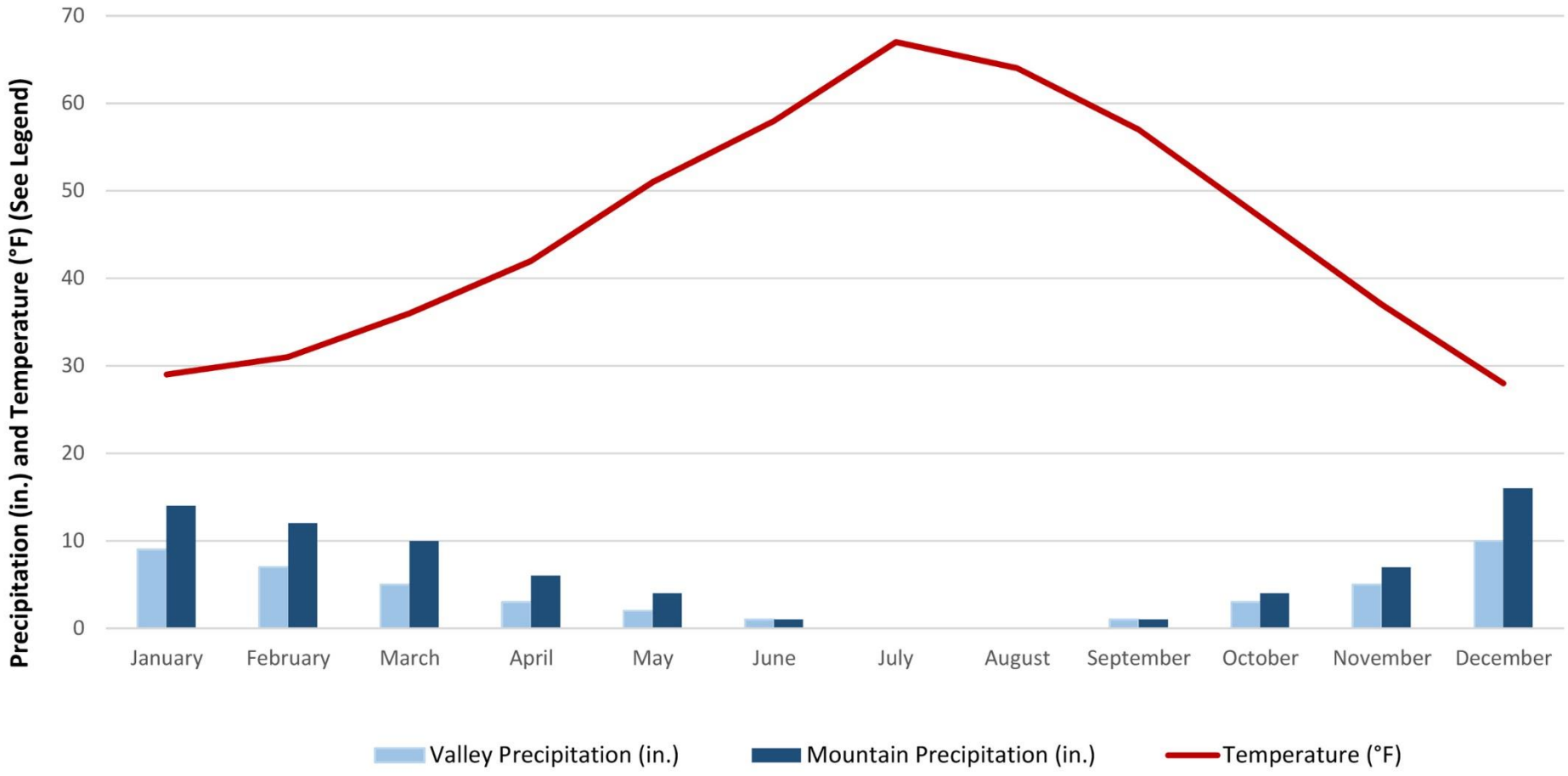
[Old] Exhibit 13-3

Squaw Valley Monthly Precipitation and Monthly Temperature Averages: 1992–2011



Source: Cardno 2015, using data from Farr West Engineering and Others, July 2015

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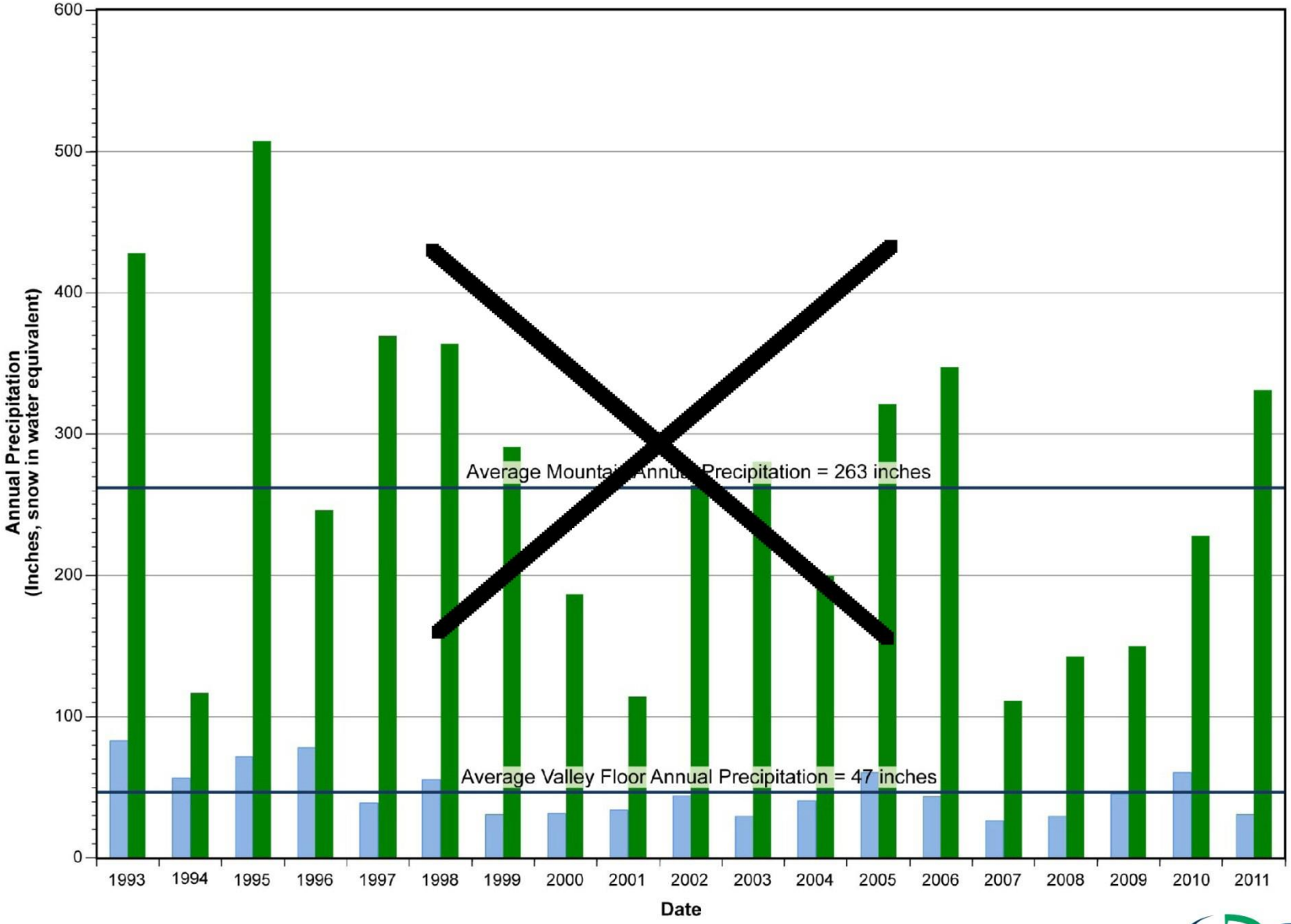
[Revised] Exhibit 13-3 **Squaw Valley Monthly Precipitation and Monthly Temperature Averages: 1992–2011**



Data Source: Farr West Engineering, Hydrometrics WRI, and TODD Groundwater, July 2014

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[Old] Exhibit 13-4

Annual Precipitation in the Squaw Valley Watershed: 1993–2011

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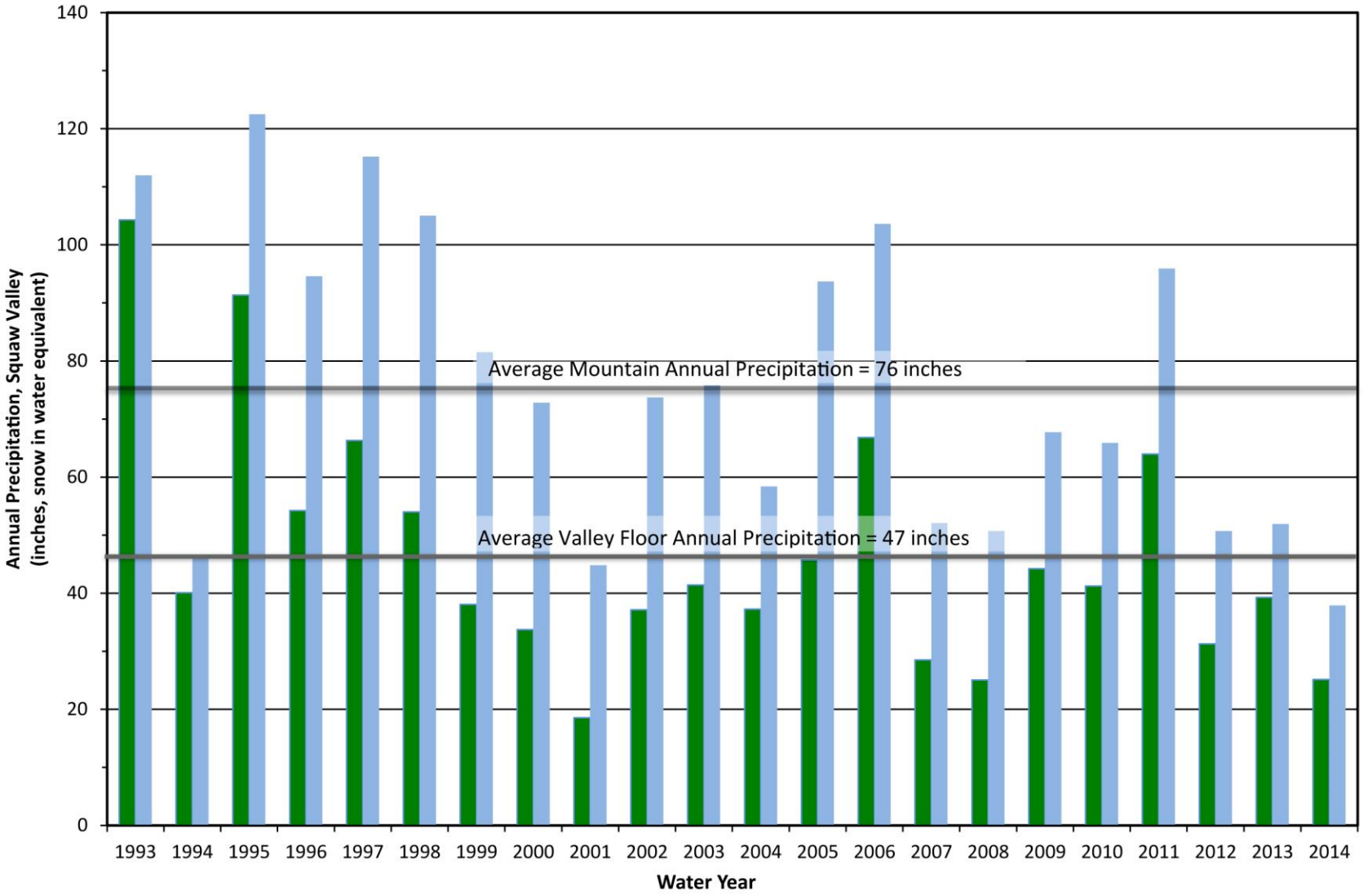

Source: Farr West Engineering, Hydrometrics WRI, and TODD Groundwater, July 2016

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[Revised] Exhibit 13-4

Annual Precipitation in the Squaw Valley Watershed: 1993–2011

In response to comments L4-28, L4-29, and L4-30, the second paragraph under Section 13.1.3, "Groundwater," on page 13-11 of the DEIR is revised as follows:

> SVPSD uses a numerical model to simulate groundwater conditions in the ~~OVGB~~ OVGMP area. This model uses the U.S. Geological Survey (USGS) MODFLOW computer code and was initially developed in 2001. The model has been updated many times as additional data has been obtained to refine the conceptual framework and improve calibration. The update used in the WSA scenarios (HydroMetrics WRI 2014) incorporated additional data regarding the thickness and extent of the geologic units, made adjustments to the recharge zones and precipitation infiltration timing, corrected unrealistic pipe loss assumptions, and extended the calibrated model period to include additional available data. As of this update, the model incorporates precipitation, withdrawal, and groundwater conditions recorded for the period from May 1992 to December 2011. ~~The calibration statistics show a slight bias towards underestimating average groundwater elevations, but an improved calibration relative to previous model iterations (HydroMetrics WRI 2014). Review of the observed groundwater level data and simulated hydrographs for individual wells (HydroMetrics WRI 2014) indicates that the model does not capture the lowest observations in several of the calibration well records, even as it matches typical and high elevation observations (e.g., Olympic Valley well ID numbers: SVPSD-5S, SVPSD-5R, SVMWC-1, SVMWC-2, RSC 328, RSC 304, RSC 305, RSC 323, RSC 325, RSC 326, RSC 308, RSC 312, RSC-321, RSC 322, RSC 320). Therefore, interpretation of model simulation results for either existing or future conditions should consider that the model may have a small bias that does not reflect extreme drawdowns at local wells (i.e., the simulated 'lowest' elevations could be a few feet too high), but does reflect the regional aquifer conditions.~~

In response to comment O8a-28a, the first paragraph on page 13-17 of the DEIR is revised as follows:

> The WSA for the proposed project (Farr West Engineering et al. 2014) concludes that in all years there is ample runoff produced in the watershed, but much of it is generated during times when the groundwater basin is already 'full' and therefore it is rejected as recharge and leaves the watershed as surface runoff in Squaw Creek. Regardless of some uncertainty about how readily and completely recharge occurs under various water year types, no studies of the OVGB indicate that the aquifer has been or is now experiencing overdraft. Rejected recharge could occur due to two mechanisms: high groundwater elevations and/or limited soil or sediment permeability relative to potential rainfall, snowmelt or surface water recharge rate. When groundwater elevations are at or near ground surface, limited storage capacity is available in the soil or unsaturated zone for additional inflow to the aquifer. Soil moisture does not need to be uniformly at 100 percent saturation for extended periods of time for this to occur. High groundwater elevations could temporarily be high due to recent rains or locally high due to inflow from the creek or other recharge source. While the model was developed to simulate rejected recharge, it only adjusted recharge on a monthly time step. Small daily variations in flow that prevent additional recharge would be smoothed.
>
> During high flows and/or heavy precipitation events, the potential recharge rate may exceed the percolation rate at a specific location resulting in additional runoff.

In response to comment O8a-28b and to provide additional context on how pumping can affect streamflow, the paragraph on pages 13-18 and 13-19 of the DEIR is revised as follows:

> Aquifer tests have indicated that pumping from existing wells during periods when Squaw Creek is flowing ~~(typically winter/spring/early summer)~~ captures only a small amount of extracted water directly from the creek (<2 percent, <0.2 cfs) (HydroMetrics 2013a)~~; that is, during periods of the year when the creek is flowing, pumping of groundwater from existing wells results in only a small amount of creek surface flows being "pulled" into the groundwater aquifer.~~ ~~Under these conditions, current groundwater pumping does not substantially alter stream flow However, during periods when there are lower flows in the creek (typically summer and fall), pumping from existing wells would capture a higher overall percentage of the reduced flow and existing pumping operations can have a greater influence on observed stream surface flows~~. Pumping induces some flow from Squaw Creek

to groundwater when water elevations in the creek (primarily winter to late spring) are higher than surrounding groundwater elevations. The rate of flow in Squaw Creek during these times is generally high, and the rate of recharge from the creek to the aquifer is small as a percentage of the overall flow (HydroMetrics 2013a). In periods when there are lower flows in the creek (typically summer and fall), pumping from existing wells captures a higher overall percentage of the reduced flow and existing pumping operations can have a greater influence on observed stream surface flows.

In response to comment L4-16, the third paragraph on page 13-37 of the DEIR is revised as follows:

On December 15, 2014, DWR announced its official "initial prioritization" of the state's groundwater basins for purposes of complying with the SGMA and this priority list became effective on January 1, 2015 (DWR 2014). DWR has ranked the Olympic Valley Groundwater Basin as "low priority." Groundwater sustainability plans are not required for low and very low priority basins. While the County and/or the SVPSD will still need to ~~take steps~~ decide whether to designate and/or form a groundwater sustainability agency for the Olympic Valley Groundwater Basin, these administrative obligations will not impact the availability of water to serve the proposed project or require revisions to the WSA prepared for the proposed project.

To ensure that cross-referencing of all relevant mitigation is clear, and in response to comment S4-8, Mitigation Measure 13-1 on page 13-47 of the DEIR is revised as follows:

Mitigation Measure 13-1: Implement water and sewer infrastructure water quality protection measures.

The project applicant shall implement the following actions, including standard mitigation measures as required by the County, to protect water quality during the design, installation, and destruction/abandonment of wells and sewer lines:

- Prior to providing final authorization for drilling of a well (e.g., initiating an applicant directed test well, providing access to property for a well drilled by another entity, final agreement to fund a well drilled by another entity), the project applicant shall confirm that required fees are paid and a drilling permit is obtained from Environmental Health Services for each well and that the location of the well meets applicable DWR criteria for distances from utility infrastructure (e.g., stormwater, sewer, and petroleum pipelines and petroleum storage tanks).

- Prior to approval of a Final Subdivision Map, the applicant shall provide to Placer County Environmental Health Services final design drawings indicating that separation between any planned or existing wells in the map area and any planned or existing stormwater, sewer, and petroleum pipelines and petroleum storage tanks is sufficient to meet applicable DWR separation requirements.

- Prior to approval of a Final Small-Lot Subdivision Map, complete or provide for the proper destruction under permit and inspection, of existing wells and abandonment of sewer lines located within the project site.

- Prior to approval of an Improvement Plan that includes the need for well destruction or sewer line abandonment, well destruction and/or sewer line abandonment shall be shown on the Improvement Plans; the actions shall be included in the engineers' estimate of costs for subdivision improvements; and the Improvement Plan will include a Plan Note indicating proper destruction, under permit and inspection, of the existing wells and abandonment of sewer lines located within the Improvement Plan area.

The project applicant shall also implement relevant provisions of Mitigation Measures 13-2a and 13-2b.

In response to comment L4-28, the second full paragraph on page 13-73 of the DEIR is revised as follows:

> Specific to changes in surface hydrology, this impact would be **less than significant** because the project would not substantially alter the existing drainage pattern or surface water body of a site or area. ~~There is some uncertainty about the ability of the model to accurately represent minimum water levels, as the model calibrations to date have not emphasized matching observed minimums. As a result, the model may underestimate extreme lows. Also, b~~Because 'all wells were modeled' the actual number of future wells could be fewer and the effect more locally severe in the vicinity of some wells than modeled. Modelling of a six-well scenario indicated that even with fewer wells, the water demand could be met and impacts would not be substantially more severe. Further, ~~However,~~ construction and operation of the well system would be implemented by the SVPSD (or other water provider) who would site wells and operate the system in a manner that minimizes groundwater effects and achieves results consistent with the groundwater modelling and WSA. Therefore, if the system is constructed and operated as planned, minimum water level conditions where there is uncertainty in the model accuracy would not occur, and well system development would match WSA performance expectations.

2.3.14 Revisions to Chapter 14, "Public Services and Utilities"

In response to comment L4-32, the first paragraph in Section 14.1.2, "Wastewater," on pages 14-7 and 14-8 of the DEIR is revised as follows:

> The SVPSD owns and operates the wastewater collection system that serves Squaw Valley. The SVPSD collection system is comprised of gravity sewer lines and two siphons. The existing SVPSD sewer system serving the plan area consists of a network of private and public minor collector lines, 8 inches or less, serving the previously developed areas. These minor collector lines connect to a number of 10-inch major collector lines, and the wastewater within the major collectors flows into a 15-inch trunk line located primarily along Squaw Valley Road. This 15-inch pipe serves customers within the eastern portion of the Valley as it flows towards SR 89. The current average dry weather flows (ADWF) generated by the plan area are 0.632~~173~~ million gallons per day (MGD) while current peak wet weather flows (PWWF) are ~~0.4505~~ 2.007 MGD (~~MacKay & Somps 2012b~~ Farr West Engineering 2014: 4). On the east side of the highway, the system discharges to the Truckee River Interceptor (TRI), which is maintained by the Tahoe-Truckee Sanitation Agency (T-TSA). The T-TSA is a regional entity that provides wastewater transmission, treatment, and disposal services to the SVPSD as well as the North Tahoe Public Utility District, Tahoe City Public Utility District, Alpine Springs County Water District, Truckee Sanitary District, and Truckee River Canyon area (MacKay & Somps 2012b).

To more accurately describe the remaining capacity of the TRI and in response to comment L5-6, the first full paragraph on page 14-8 of the DEIR is revised as follows:

> The 17-mile TRI sewer line transports wastewater flows to the wastewater treatment facility located east of Truckee in the Martis Valley, which is also operated by T-TSA. The capacity of the treatment facility is 9.6 MGD on a seven day dry weather average flow basis and the capacity at the upstream end of the TRI is 6.0 MGD. ~~Both the treatment plant and TRI are operating at approximately 80 percent of capacity. Based on this information,~~ In 2012, the remaining available capacities at the treatment plant and in the TRI ~~are~~ were estimated to be 1.92 MGD and 1.20 MGD, respectively (MacKay & Somps 2012b). Therefore, the treatment plant is operating at approximately 80 percent of capacity. The capacity of the TRI is limited by existing bottlenecks, and T-TSA is currently studying the possibility of upsizing and replacing sections of the TRI.

In response to comment L5-7, the first paragraph under "Impact 14-2: Increased demand for wastewater collection, conveyance, and treatment" on page 14-36 of the DEIR is revised as follows:

> The SVPSD owns and operates the wastewater collection system that serves Squaw Valley. The project would connect to existing SVPSD transmission lines. T-TSA would provide wastewater treatment at its existing water reclamation plant, located in Nevada County along the Truckee River, east of the Town of Truckee. The plant, which has a capacity of 9.6 MGD, provides primary and secondary treatment, phosphorus removal, biological nitrogen removal, disinfection, and effluent filtration (T-TSA 2012). The project could generate 0.350 MGD of ADWF and 0.852 of PWWF at buildout (MacKay & Somps 2014d). In 2012, the ~~The~~ remaining capacity at the treatment plant ~~is~~ was estimated to be 1.92 MGD. ~~Therefore, the treatment plant has sufficient capacity to serve the project at buildout, even at peak wet weather flows. As of 2012, the treatment plant was operating at 80 percent of capacity (7.68/9.60 MGD) (MacKay & Somps 2012b).~~ The WRP currently has sufficient capacity to serve a development as large as the proposed project. However, capacity allocations for customers and projects in T-TSA's service areas are made in the order that applications are received. As specific elements of the ~~The~~ project are proposed, they would be required to obtain a Will Serve letter from SVPSD ~~T-TSA~~ and a SVPSD ~~T-TSA~~ representative's signature shall be provided on the Improvement Plans.

In response to comments L4-34, L5-5, and O12b-2, Mitigation Measure 14-2a on pages 14-36 and 14-37 of the DEIR is revised as follows:

> **Mitigation Measure 14-2a: Provide sufficient on-site wastewater storage.**
> In the event that T-TSA finds that project-generated peak wastewater flows may exceed the capacity of the TRI during peak flows, wastewater detention facilities, such as enlarged pipes, vaults, or tanks, shall be incorporated into the Specific Plan to time wastewater flows to off-peak conditions when the TRI has sufficient capacity. These facilities will be located within the plan area and will be underground or otherwise incorporated into project's development footprint (e.g., incorporated into a building podium). All facilities will be designed and maintained according to applicable design standards such that effluent would be fully contained. The project applicant shall work directly with T-TSA to determine a sufficient volume of detention capacity for the project and to define the methodology for determining when wastewater detention facilities should be used, and timing for releases from these facilities. The capacity of the on-site storage shall only be sufficient to meet the peak capacity needs associated with the project. A SVPSD representative's signature ~~from T-TSA~~ shall be provided on the Improvement Plans.

In response to comment F2-2, the third paragraph under Impact 14-6 (Increased demand for parks and recreational facilities) on page 14-42 of the DEIR is revised as follows:

> The project would create new and expanded public recreational facilities within and outside of the plan area, including: extension of a Class I bicycle trail through the plan area; public trail connections within and outside the plan area; ~~public access to backcountry trails;~~ safety improvements to existing private trails and USFS trails (compaction, erosion control, stepping, obstacle removal); construction of a new trail connection between Granite Chief Trail and Shirley Canyon Trail; a meadowlands interpretive park and stream restoration area; and the physical construction or payment of in-lieu fees for improvements to the Squaw Valley Community Park that may include new flush restrooms, sewer hookup, and/or other amenities. The project would include a network of village pedestrian spaces, trails, and bike paths that would provide enhanced access to existing public amenities, and would include features such as picnic areas, employee recreational areas, interpretive graphics, signage, trailheads, and new restrooms. Improvements to the Granite Chief and Shirley Canyon trailheads, as part of the project, would include parking, signage, and bike parking. A ~~hiking trail and~~ Class I path would be constructed ~~through~~ along frontage of the East Parcel ~~to connect to an existing trail~~. Improvements to other existing trails, such as the World Cup Trail and Thunder Mountain Trail, at the base of the resort, would include new signage and trail improvements designed to enhance

the visitor experience (safety improvements, as described above). Bike lanes would be provided on all primary roads and a Class I bike path would be provided along Squaw Creek to provide a non-vehicular route with gathering spots, interpretive signage, and informational graphics on restoration areas.

2.3.15 Revisions to Chapter 15, "Hazardous Materials and Hazards"

To provide additional information related to the Emergency Preparedness and Evacuation Plan that is being prepared by the applicant, Impact 15-4 on page 15-19 is revised as follows:

Impact 15-4: Interference with an adopted emergency evacuation plan.

The existing surface parking lots at the Squaw Valley Ski Resort are currently used as the emergency rally point during emergencies, and would continue to be used as such during project construction. In the long-term, the new parking structures on Lots 11 and 12 would serve as the emergency rally point. During project construction and peak operational days, increased traffic congestion along Squaw Valley Road and SR 89 could interfere with the use of these main roadways for emergency evacuation routes. Although this impact would be temporary and intermittent over the 25-year construction period, this impact would nonetheless be **significant**.

Access to Squaw Valley is limited by the configuration of the Valley and the Truckee River canyon; there is only one means of ingress and egress (Squaw Valley Road), and a single road (SR 89) connects Squaw Valley to adjoining communities. The *Wildland Fire Evacuation Plan* (SVPSD 2014; Appendix J), which applies to all development in Squaw Valley, includes evacuation protocols, guidance for preparing homes for evacuation, and evacuation routes. The plan calls for evacuating via Squaw Valley Road to SR 89; or, if it is not possible to leave the Valley, driving to the Squaw Valley Ski Resort parking lot. The project includes changes to the parking lots, including the construction of podium (second story) parking structures on Lots 11 and 12. During construction, the surface parking lots would continue to be used as the emergency rally point, should evacuation be required. After the parking structures are constructed and opened for use, the emergency rally point would be located at the new parking structures.

The VSVSP is also subject to State and SVFD requirements for managing fuel loads (e.g., dense vegetation) and maintaining "defensible space" within the plan area. These measures would reduce the risk of fire starting or spreading within the plan area.

The applicant is preparing an Emergency Preparedness and Evacuation Plan (EPEP), which will address the potential risks from wildfire, seismic risks, avalanches, and flooding hazards within the plan area, as well as evacuation. The completed EPEP will be submitted to the Board of Supervisors when the Board considers project approval; it will be adopted as part of the VSVSP. The EPEP is intended to provide a coherent road map for which to prepare and guide VSVSP staff in the unlikely event of an emergency. In addition to compliance with State, County, and other local laws and regulations, such as the defensible space and fuel maintenance requirements mentioned above, the EPEP will include:

- Descriptions of existing conditions pertaining to wildfire, seismic hazards, avalanche, and flooding. A discussion of topography, vegetation, climate, fire history, fire hazard severity zones, and the capabilities of the SVPSD/SVFD and other resources will be provided.

- On overview of the regulatory requirements that apply to the VSVSP, including such topics as fuel maintenance, defensible space, structural and infrastructure requirements (e.g., fire flow minimums, emergency access road standards), building code requirements, and the County's ordinances for construction in avalanche zones and flood damage prevention.

- Emergency planning measures that will be implemented with the VSVSP, including fire prevention measures, wildfire education, measures to protect people and buildings from avalanches, seismic activity and flood damage, and an evacuation plan. The evacuation plan will be designed to integrate with the County's East Side Emergency Evacuation Plan, which prescribes specific responsibilities for first responders and other agencies that would be involved in an emergency evacuation, defines typical evacuation scenarios, establishes incident command responsibilities, and addresses traffic control, transportation, resources, and support, communications, care, and shelter and animal services. The VSVSP plan will define staff roles and responsibilities, including staff responsible for communicating with emergency service providers, and, in case of evacuation, the County's incident command, the managers of hotels and other facilities, staff, and guests. Communication protocols will also be included to ensure that staff and guests are provided information about potential emergencies, as well as for notifying staff and guests when there may be a need to take action due to an emergency, up to and including evacuation of the plan area.

In addition, a dedicated emergency helipad would be provided within the main Village area. The helipad would only be used for emergency services. Currently, emergency helicopter landing areas are available on an as as-needed basis in parking lots and other open areas on the Valley floor and level areas on the mountain, but these areas are not always available. The proposed helipad is anticipated to be a located on a raised structure on the existing Preferred Parking lot (this parking lot is shown on Exhibit 3-8 in Chapter 3, "Project Description"). The helipad design and construction would incorporate a dedicated elevator that could accommodate a medical gurney, proper aeronautical markings, and snow clearing operations. (See Chapter 11, "Noise," for a discussion of noise impacts from the proposed helipad). Therefore, emergency helicopter access in the main Village area would not be reduced by the proposed project, and could be enhanced by creation of a dedicated helipad.

The project would increase traffic on local roadways associated with construction trips. In addition, temporary lane/road closures associated with project construction could cause or contribute to temporary increases in traffic levels as traffic is detoured or slowed on some local roadways, Squaw Valley Road, and SR 89. Increased traffic congestion along Squaw Valley Road and SR 89 could interfere with the use of these main roadways for emergency evacuation routes. See Chapter 9, "Transportation and Circulation," for further discussion of traffic-related impacts. This impact would be **significant**.

2.3.16 Revisions to Chapter 16, "Greenhouse Gases and Climate Change"

In response to the recent California Supreme Court decision, *CBD v CDFW*, and as explained in detail in Section 3.1, "Master Responses," of this FEIR, the regulatory setting on page 16-4 of the DEIR is revised as follows:

EXECUTIVE ORDER S-3-05

Executive Order S-3-05, signed by Governor Arnold Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emission targets for the State. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

As described below, legislation was passed in 2006 (Assembly Bill 32) to limit GHG emissions to 1990 levels by 2020 with continued "reductions in emissions" beyond 2020, but no specific additional reductions were enumerated in the legislation. Further, Senate Bill 375 (sustainable community strategies/transportation) established goals for emissions from light duty truck and automobiles for 2020 and 2035.

A recent California Appellate Court decision, *Cleveland National Forest Foundation v. San Diego Association of Governments* (November 24, 2014) Cal.App.4th, further examined the executive order and whether it should be viewed as having the equivalent force of a legislative mandate for specific emissions reductions. The case has been accepted for review by the California Supreme Court, and therefore is not currently considered a precedent.

EXECUTIVE ORDER B-30-15

On April 20, 2015 Governor Edmund G. Brown Jr. signed Executive Order B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor's executive order aligns California's GHG reduction targets with those of leading international governments such as the 28-nation European Union which adopted the same target in October 2014. California is on track to meet or exceed the current target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050. This is in line with the scientifically established levels needed in the U.S. to limit global warming below 2°C, the warming threshold at which there will likely be major climate disruptions such as super droughts and rising sea levels.

In response to the recent California Supreme Court decision, *CBD v CDFW*, and as explained in detail in Section 3.1, "Master Responses," of this FEIR, the regulatory setting on page 16-6 of the DEIR is revised as follows:

SENATE BILL X1-2, THE CALIFORNIA RENEWABLE ENERGY RESOURCES ACT OF 2011 AND CLEAN ENERGY AIR POLLUTION REDUCTION ACT OF 2015 (SENATE BILL 350)

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 20 percent of their electricity from renewables by December 31, 2013; 25 percent by December 31, 2016; and 33 percent by December 31, 2020. SB X1-2 also requires the renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014-2016 compliance period, and at least 75 percent for 2016 and beyond.

SB 350 of 2015 requires all California utilities to generate 50 percent of their total electricity from renewable resources by 2030.

In response to the recent California Supreme Court decision, *CBD v CDFW*, and as explained in detail in Section 3.1, "Master Responses," of this FEIR, the significance criteria on page 16-9 of the DEIR is revised as follows:

PLACER COUNTY

Appendix G of the State CEQA Guidelines indicates that a proposed project would result in a potentially significant impact on climate change if it would:

- generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

PCAPCD recently developed the following recommendations for thresholds of significance for evaluating construction- and operation-related GHG emissions for proposed land use development projects in its jurisdiction. These thresholds were developed in collaboration with the Sacramento Metropolitan Air Quality Management District (SMAQMD), the Yolo Solano Air Quality Management District (YSAQMD), and the Feather River Air Quality Management District (FRAQMD) (Green, pers. comm., 2014a). These thresholds are intended to evaluate a project for consistency with GHG targets established in AB 32, particularly for emissions occurring by 2020. The term "no action taken" is used here to reflect conditions, including regulations, in place when GHG reduction targets were established by ARB; ARB evaluated the potential statewide level of GHGs in 2020 if no actions were taken, and determined the level of reduction that would be needed to attain 2020 targets.

- for the evaluation of construction-related emissions, PCAPCD recommends using the mass emission threshold of 1,100 metric tons of carbon dioxide-equivalent per year (MTCO2e/year);
- for the evaluation of operational emissions PCAPCD recommends a 2-tier approach:
  - (Tier I) Operational emissions of a project would not have a significant impact on the environment if they are less than 1,100 $MTCO_2e$/year, and
  - (Tier II) Projects with operational emissions that exceed 1,100 $MTCO_2e$/year, but are able to demonstrate a 21.7 percent reduction from a "no action taken" (NAT) scenario compared to the proposed project operating in 2020 would not conflict with ARB's Scoping Plan.

The Tier II criterion is based on the "business as usual" (BAU) model (BAU is the same as NAT) in the Scoping Plan, which found that GHG emissions statewide would need to be reduced by 21.7 percent compared to their trajectory at that time (in 2011) in order to meet the AB 32 target for 2020, that is, attain 1990 GHG emission levels by 2020. Based on the California Supreme Court case, *Center for Biological Diversity v. California Department of Fish and Wildlife (CBD v CDFW)*, the Tier II criteria (21.7 percent below NAT) may continue to be used if a direct connection can be made between the Scoping Plan model and a project in a specific location. Because this connection has not been established and may not be able to be established for any specific project in California given the statewide nature of the Scoping Plan, SMAQMD no longer recommends using the NAT-based approach as a sole threshold criterion (Green, pers. comm., 2016); Tier II is not considered a significance criterion for this project. ~~For projects with operational emissions that exceed 1,100 $MTCO_2e$/year, but are able to demonstrate a 21.7 percent reduction from the NAT scenario, PCAPCD allows lead agencies discretion about whether an exceedance of the Tier I threshold (i.e., 1,100 MT/year) constitutes a significant impact (Green, pers. comm., 2014a).~~

For the evaluation of this project, the County ~~bases its significance determination for operational emissions on the two tier method above, but~~ considers that an impact would be significant if the ~~both~~ Tier I ~~and Tier II~~ threshold is exceeded.

~~The County's impact conclusion is based on the~~ A GHG-efficiency analysis of the proposed project is provided for informational purposes, and is based on full buildout during the state's current AB 32 target threshold year of 2020, as well as estimation of operational GHG emissions in 2037, which is the projected year for full project buildout. This methodology is explained in further detail below. Because full buildout would not occur until after the 2020 comparison year, this analysis also includes a qualitative discussion of potential GHG impacts in the timeframe beyond 2020, a period for which there is currently no state-adopted GHG emissions reduction target.

In response to the recent California Supreme Court decision, *CBD v CDFW*, to update the analysis to more current emissions data, and as explained in detail in Section 3.1, "Master Responses," of this FEIR, the estimation of GHG emissions (third paragraph on page 16-13 of the DEIR) is revised as follows:

Indirect emissions associated with electricity consumption were calculated based on utility emission factors for Sierra Pacific Resources (doing business as NV Energy) for CO_2, N_2O, and CH_4 as contained in CalEEMod, also factoring in reductions in those emissions attributed to compliance with the Renewable Portfolio Standards requirements for 2020 (33 percent of electricity from renewable sources) and 2030 (50 percent of electricity from renewable sources) and estimates of project-related electricity consumption estimated by the dry utilities study prepared for the Specific Plan (MacKay & Somps 2015:15). The amount of electricity used to operate the ground water wells that would serve the Specific Plan area was estimated based on the volume of water that would be required by the Specific Plan and the average well depth, as determined by the water supply assessment (Farr West Engineering et al. 2014:ES-4; included as Appendix C) and energy intensity factors for well operation published by CEC (CEC 2006:40). Indirect GHG emissions associated with the treatment of wastewater generated by the project were estimated using emission factors from the wastewater module of CalEEMod and the volume of wastewater generation estimated in a sewer report prepared for the Specific Plan (MacKay & Somps 2014:5). Indirect GHG emissions associated with the quantity of solid waste generated by the land uses was estimated using the applicable module in CalEEMod.

In response to the recent California Supreme Court decision, *CBD v CDFW*, to update the analysis to more current emissions data and as explained in detail in Section 3.1, "Master Responses," of this FEIR, the GHG efficiency analysis (first, second, and third full paragraphs on page 16-14 of the DEIR) is revised as follows:

GREENHOUSE GAS EFFICIENCY ANALYSIS

For this ~~D~~EIR, a GHG efficiency analysis is conducted to illustrate the GHG efficiency of the project, compared to how similar projects would have performed prior to AB 32 and related GHG targets and regulatory measures were established. This type of analysis, generally accepted prior to *CBD v CDFW* as a means for determining impact significance, is provided in this FEIR only for the purposes of providing a metric by which Placer County can determine if the project's generation of GHGs are relatively efficient. The analysis was conducted by estimating emissions for two separate emission scenarios, as previously recommended by PCAPCD (Green, pers. comm., 2014a, 2014b). One is a "no action taken" (NAT) scenario, a hypothetical scenario which estimates operational GHG emissions in 2020 (assuming buildout by that year) without implementation of regulations that were put in place since 2006 to help achieve the statewide GHG reduction goal mandated by AB 32. Regulations that have been put in place under the AB 32 mandate, but not accounted for in the NAT scenario include the Low-Carbon Fuel Standard for transportation fuels; the fuel economy standards of the Advanced Clean Cars regulation that result in new vehicles being increasingly more GHG-efficient; the renewable electricity standard which requires California utilities to generate 33 percent of their electricity from renewables by 2020; and the California Building Efficiency Standards (Title 24, Section 6) that result in increased efficiency in heating and cooling of buildings. The other scenario, referred to in this DEIR as the full-buildout 2020 scenario, estimates operational GHG emissions with implementation of these regulations if the project were built out and became fully operational in 2020. This scenario is also hypothetical because full buildout of the Specific Plan would occur no sooner than 2037. The 2020 analysis year is used to compare these two scenarios because 2020 is the target year for achieving the GHG reduction goal identified by AB 32. As described in Section 16.2.2, "State," of the Regulatory Setting above, AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. However, in recognition of these unrealistic buildout assumptions, this EIR also examines what may occur beyond 2020, including a discussion of GHG reduction targets that may be established by ARB and/or the California State Legislature beyond 2020, what specific regulations may be developed to achieve those targets, and the ability and likelihood the project would comply with those regulations to meet those targets.

The purpose of the efficiency analysis is to determine whether the full-buildout 2020 scenario is at least 21.7 percent more GHG efficient than the NAT scenario. An efficiency target of 21.7 percent is used because, as explained in Section 16.2.2, "State," of the Regulatory Setting, above, ARB

calculated that a reduction of 21.7 percent from 2020 NAT emissions is needed for California to reach 1990 emission levels (ARB 2011). This should not be implied to mean that a 21.7 percent reduction in GHG emissions compared to 2020 NAT is not significant; rather, it is only intended to reflect if the project is as efficient as the state, as a whole, is expected to be in order to attain AB 32 requirements. In reality, new projects, such as this project, may need to perform more efficiently than the state, as a whole, in order for such projects to help the state attain its goals. This is because new projects may be more capable of being GHG-efficient than existing development in the statewide economy, wherein the existing development could require significant modifications to hit efficiency targets. There are no current mechanisms available to determine the level of GHG-efficiency needed on a single project in order to determine if it fits within the State's Scoping Plan targets.

Refer to Appendix ~~H~~ G of this ~~DEIR~~ FEIR for a detailed description of all calculations, model runs, and assumptions used to support the efficiency analysis.

In response to DEIR comments regarding GHG emissions associated with the upgrade to the existing approximately 1.87-mile-long sewer line between the existing Village and SR 89 (see the Master Response regarding construction emissions), Table 16-1 on page 16-15 of the DEIR is revised as follows to include these GHG emissions:

Table 16-1 Summary of Maximum Annual GHG Emissions Associated with Project Construction Activities

Construction Activity	MT CO_2e/year
Village and East Parcel	
Demolition	59
Site Preparation	56
Grading	87
Paving	33
Building Construction	624
Architectural Coatings	81
Upgrade to Utility Line Connection	95
Total Maximum Annual Emissions	~~940~~ 1,036
PCAPCD Tier I Threshold of Significance	1,100

Notes: Modeled values represent maximum GHG emissions that could occur if up to 20 percent of the land uses are under construction during any single year. See Appendix H for detail on model inputs, assumptions, and project specific modeling parameters.

MT CO_2e/year = metric tons of carbon dioxide-equivalent per year, PCAPCD = Placer County Air Pollution Control District

Source: Modeling conducted by Ascent Environmental in ~~2014~~ 2015

In response to the recent California Supreme Court decision, *CBD v CDFW*, to update the analysis to more current emissions data and as explained in detail in Section 3.1, "Master Responses," of this FEIR, Impact 16-2 on pages 16-15 through 16-18 of the DEIR is revised as follows:

IMPACT 16-2: OPERATIONAL GREENHOUSE GAS EMISSIONS.

GHGs associated with operation of the Specific Plan would exceed the Tier I mass-emission threshold of 1,100 MT CO_2e/year~~; however, operational GHGs would not exceed the GHG efficiency based Tier II threshold recommended by PCAPCD for 2020~~. ~~Nevertheless,~~ GHG emissions would be substantial ~~and may be less efficient than needed to achieve GHG reduction targets that could be in place after 2020,~~ when the project is completed. Therefore, operation of the Specific Plan has the potential to result in a substantial contribution to GHG emissions. This impact would be **potentially significant**.

Operation of the facilities developed under the Specific Plan would result in GHG emissions associated with motor vehicle trips to and from the Specific Plan area, the combustion of propane for space and water heating, the consumption of electricity and water, the generation of wastewater and solid waste, and equipment used for landscaping and snow removal. The removal of vegetation would also result in the loss of sequestered carbon. Table 16-2 summarizes all the direct and indirect sources of GHG emissions associated with the Specific Plan upon full buildout in 2037. The emissions estimates are based on the application of existing regulations pertaining to vehicle emissions, building standards, and electricity generation.

The analysis is updated from the DEIR to reflect more precise calculations of electricity consumption for the project based on three years of data, the protocol recommended by ARB, rather than a single year as used in the DEIR. The RPS (33 percent use of renewables in 2020) were not assumed in the DEIR because the utility serving the project was undergoing ownership transition, and it was unknown whether some or all of the electricity would be sourced from California. As described in Appendix G1 of this document (see footnote 5 of the RPS table), Liberty Utilities purchased the electricity supplier to the project in 2012, and will meet RPS standards. Therefore, GHG reductions of 33 percent (2020) and 50 percent (2030 and after) can be applied to the electricity-related indirect GHG emissions associated with the project. ~~This is explained further below.~~

Table 16-2 Summary of Annual Greenhouse Gas Emissions Associated with the Specific Plan at Full Buildout in 2037

Emissions Activity	MT CO_2e/year
Vehicle Trips (mobile sources)	14,241
Propane Combustion	19,732
Electricity Consumption[2]	~~10,941~~ 4,514
Water Consumption	25
Wastewater Treatment	147
Solid Waste Generation	92
Landscaping Equipment	10
Snow Removal Equipment	56
Construction[1]	118
Loss in Carbon Sequestration from Vegetation Removal[1]	40
Total Maximum Yearly Emissions	~~45,403~~ 38,975
PCAPCD's Tier 1 Threshold of Significance	1,100

Notes: See Appendix H of the DEIR for detail on model inputs, assumptions, and project specific modeling parameters, with the electricity consumption modified to reflect RPS standards (see Appendix G of this document).

MT CO_2e/year = metric tons of carbon dioxide-equivalent per year

[1] Construction emissions and the loss in sequestered carbon from removed vegetation are amortized over an estimated 25-year build out period of the Specific Plan.

[2] The electricity emission factor uses the 2006 through 2008 average non-renewable emissions from Sierra Pacific Company, with the application of 50% renewables due to the Renewable Portfolio Standard goal for 2030. Three-year average based on ARB guidance for 2020 Business-as-Usual (BAU) projections: http://www.arb.ca.gov/cc/inventory/data/bau.htm.

Source: Modeling conducted by Ascent Environmental in 2014 and Ramboll in 2016

As shown in Table 16-2, upon full buildout, GHG emissions associated with operation of the proposed project would exceed the Tier I mass emission threshold of 1,100 MT CO_2e/year, which is a significant impact. ~~Therefore,~~ To help characterize the nature of the impact, this analysis evaluates

the GHG efficiency in which the proposed project would operate compared to the NAT scenario in 2020 ~~(Tier II)~~. Table 16-3 summarizes the results of emissions estimates for both scenarios.

As shown in Table 16-3, emissions from many sources would be less under the full-buildout scenario than the NAT scenario due to the GHG regulations under the AB 32 mandate that would decrease operational GHG emissions. Emissions from project-related vehicle trips would be less in the full-buildout scenario due to implementation of regulations governing vehicle emission standards for GHGs, including the GHG vehicle standards in Advanced Clean Cars and the Low-Carbon Fuel Standard. Approximately 25 percent less propane would be needed for space and water heating and 25 to 30 percent less electricity would be needed to power appliances and lighting in the full-buildout scenario due to implementation of the California Building Efficiency Standards (Title 24, Section 6) (Green, pers. comm. 2014b). It is noted that the emissions in 2020 full-buildout scenario are slightly higher than estimated for full buildout in 2037, although the same GHG reduction regulatory standards are applied. This is because a certain percentage of older vehicles projected to be on the road in 2020 would be replaced by newer vehicles over time that better meet emissions standards and have higher gas mileage, resulting in less GHG emissions from the overall vehicle fleet in later years, and the RPS requirements for electricity increase from 33 to 50 percent.

Overall, the total GHG emissions under the full-buildout scenario in 2020 would be approximately ~~25~~ 29 percent less than the NAT scenario. This level of GHG efficiency is viewed in light of the overall Scoping Plan goals of a 21.7 percent reduction needed for the state, compared to NAT. Thus, the project appears to be relatively GHG-efficient, although the emissions substantially exceed the 1,100 MT CO_2e/year threshold of significance. ~~Therefore, GHG emissions associated with operation of the proposed project would not conflict with ARB's Scoping Plan for 2020 targets.~~

Table 16-3 Summary of Annual Greenhouse Gas Emissions Associated with the No Action Taken (NAT) and Full-Buildout Scenarios in 2020 (MT CO_2e/year)

Emissions Activity	No Action Taken Scenario	Full-Buildout 2020 Scenario
Vehicle Trips (mobile sources) [1]	21,004	15,832
Propane Combustion [2]	26,309	19,732
Electricity Consumption [2, 3]	~~14,588~~ 11,175	~~10,941~~ 6,042
Water Consumption [4]	25	25
Wastewater Treatment [5]	147	147
Solid Waste Generation [5]	92	92
Landscaping Equipment [5]	10	10
Snow Removal Equipment [5]	56	56
Construction [6]	118	118
Loss in Carbon Sequestration from Vegetation Removal [6]	40	40
Total Maximum Yearly Emissions	~~62,931~~ 58,976	~~46,994~~ 42,094
Percent Less than Building-As-Usual Scenario	—	~~25.3%~~ 28.6%

Notes: See Appendix H for detail on model inputs, assumptions, and project specific modeling parameters.

MT CO_2e/year = metric tons of carbon dioxide-equivalent per year

[1] Emissions from vehicle trips would be less in the full-buildout scenario due to implementation of regulations governing vehicle emission standards for GHGs, including the vehicle emission standards from Advanced Clean Cars and the Low-Carbon Fuel Standard. These regulations provide increasingly stringent emission standards over time.

[2] In the full-buildout scenario, consumption of both propane for space and water heating and electricity for powering appliances and lighting would be approximately 25 percent less due to implementation of the California Building Efficiency Standards (Title 24, Section 6) (Green, pers. comm. 2014b).

[3] ~~Emissions associated with electricity consumption would be lower in the full-buildout scenario due to implementation of renewable requirements in the electric power generation industry; however, this reduction is not accounted for in this analysis because complete information about the GHG intensity factors (historical and projected) for the local utility, California Pacific Electric Company (CalPeco), are not available. CalPeco became the electric service~~

Table 16-3 Summary of Annual Greenhouse Gas Emissions Associated with the No Action Taken (NAT) and Full-Buildout Scenarios in 2020 (MT CO_2e/year)

~~provider to Olympic Valley in 2011 after it acquired assets from Sierra Pacific Power Company (Liberty Energy 2010). For both scenarios, emissions associated with electricity consumption were estimated using the GHG intensity factor for Sierra Pacific Company for 2008 in CalEEMod.~~ The electricity emission factor for the NAT scenario uses the 2006 through 2008 average emission factor from Sierra Pacific Company (dba NV Energy), which was the electric service provider to Olympic Valley until 2010. Information about GHG intensity factors (historical and projected) for the local utility, California Pacific Electric Company (CalPeco), are not available. For the Full-Buildout 2020 scenario, the average non-renewable emissions were used with the application of 33% renewables due to the Renewable Portfolio Standard requirement for 2020.

[4] Emissions associated with water consumption would not differ among the two scenarios because the level of water consumption is ultimately determined by the limited supply of groundwater in Olympic Valley as discussed in the water supply assessment (Farr West Engineering et al. 2014), and water conservation measures would be implemented under both the NAT and full-buildout scenarios.

[5] No substantial difference would be expected in emissions associated with wastewater treatment, the generation of solid waste, landscaping and snow removal activities, construction, or the loss in carbon sequestration associated with removal of vegetation during construction.

[6] Construction emissions and the loss in sequestered carbon from removed vegetation are amortized over an estimated 40-year operational life of the Specific Plan.

Source: Modeling conducted by Ascent Environmental in 2015

Post 2020 Considerations

As described in Section 16.2.2, ARB is working toward recommending goals that extend beyond 2020 and, further, Executive Order SB-3-05 set a target of reducing emissions to 80 percent below 1990 levels by 2050 and Executive Order B-30-15 set and interim (before 2050) target to reduce emissions 40 percent below 1990 levels by 2030. New legislation is proposed to establish post-2020 goals, but no action on the legislation has been taken as of this writing (~~May 2015~~March 2016). While project design and specific plan policy implementation contribute to reducing potential GHG emissions from the project, achievement of future GHG efficiency standards is largely dependent on regulatory controls applied to all sectors of the California economy. As stated above in the summary of the updated Scoping Plan and repeated here:

> California will develop a mid-term target to frame the next suite of emission reduction measures and ensure continued progress toward scientifically based targets. This target should be consistent with the level of reduction needed [by 2050] in the developed world to stabilize warming at 2°C (3.6°F) [above pre-industrial levels] and align with targets and commitments elsewhere. The European Union has adopted an emissions reduction target of 40 percent below 1990 levels by 2030. The United Kingdom has committed to reduce its emissions by 50 percent below 1990 levels within the 2022–2027 timeframe, and Germany has set its own 2030 emissions target of 55 percent below 1990 levels. The United States, in support of the Copenhagen Accord, pledged emission reductions of 42 percent below 2005 levels in 2030 (which, for California, translates to 35 percent below 1990 levels).
>
> This level of reduction is achievable in California. **In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050**. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions (ARB 2014b:34, **emphasis added**).

Thus, the ability of this project—and all land use development—to achieve any goals beyond 2020 is partially out of the control of the project and its developer. First, a specific goal has not been established, beyond the Executive Order Goal of 80 percent below 1990 GHG levels by 2050. ARB has stated in its Update, cited above, that additional "mid-term" targets (such as when this project is expected to buildout) must still be established, and it would be speculative to do so for this DEIR.

There is a question as to whether the SACOG MTP/SCS, which establishes GHG emissions goals for automobiles and light duty trucks for 2020 and 2035, establishes an overall GHG target for the project past 2020. As previously described, SACOG was tasked by ARB to achieve a 9 percent per capita reduction compared to 2012 vehicle emissions by 2020 and a 16 percent per capita reduction by 2035, which ARB confirmed the region would achieve by implementing its SCS (ARB 2013). However, this target cannot be directly translated to an overall threshold, given it only concerns GHG emissions from transportation. The project area, including the project site, is shown in the SCS as "Lands Not Identified for Development" in the SCS planning period (through 2035). While the MTP/SCS acknowledges it cannot predict land use on a parcel-by-parcel basis throughout the SACOG region, the project is apparently not included in the SCS growth predictions. If development follows the trends and predictions for growth in the SCS for the SAGOC region over the next 20 years, development at the project site would be additional to SCS assumptions.

The project would produce substantial levels of GHG emissions. Implementation of Mitigation Measure 10-2, which requires construction and operation of land uses and facilities developed under the Specific Plan to not generate emission of ozone precursors that exceed PCAPCD's mass emission thresholds, would likely have the co-benefit of reducing project-related GHG emissions as well. Also, as previously stated, the Specific Plan contains many policies that, if strictly implemented, would result in additional GHG reductions, including the requirement that a minimum of 25 percent of new shuttle services within the Olympic Valley will use alternative fuels (Policy CP-5), that individual buildings would be designed to a level equivalent to at least the Silver rating of the U.S. Green Building Council's Leadership in Energy & Environmental Design (LEED) certification program or other comparable rating, and other actions are taken to reduce GHG emissions (Policies CC-13 and CC-15). The efficacy of the Specific Plan policies cannot be predicted, in large part because several are not mandatory (in some instances, actions are "encouraged," "should" be implemented, would be implemented "if feasible," etc.). The implementation of these policies, as well as Mitigation Measure 10-2, would result in additional GHG efficiency beyond what is shown in Table 16-3. ~~While the proposed project would meet the GHG efficiency standard tied to the current 2020 statewide GHG emissions target,~~ This DEIR cannot determine if the project would meet future thresholds that have not been established because it would be purely speculative to do so.

Therefore, the ability of the project to meet GHG targets beyond 2020 is unknown, and cannot be known because these targets have not been established and, further, attainment would at least be partially reliant on potential new regulations that would be adopted in the future, as well, potentially, on the degree to which Cap-and-Trade regulations are assumed by ARB to already reduce GHG emissions subject to the program (gasoline/other fuel, propane, electricity) on a project-by project basis. It is unlikely that the project could meet long-term GHG efficiency aspirations, such as those expressed in EO-3-05 (80 percent below 1990 GHG levels in 2050) without substantial statewide regulations, such as those that may result in more electric vehicles in the fleet mix, more stringent energy efficiency standards for buildings, higher Cap-and-Trade reduction requirements, and an increase in the generation of renewable electricity. In addition, the project would generate emissions well above PCAPCD's current Tier 1 level. Because the project would generate substantial GHG emissions, and because it is not known if the project would be consistent with future GHG reduction targets, the impact would be **potentially significant**.

In response to the recent California Supreme Court decision, *CBD v CDFW*, to update the analysis to more current emissions data and as explained in detail in Section 3.1, "Master Responses," of this FEIR, Mitigation Measure 16-2 on page 16-19 of the DEIR is revised as follows:

Mitigation Measure 16-2: Implement ongoing operational greenhouse gas review and reduction program.

The state legislature or Governor's Office may establish new GHG targets or other programs or metrics that apply ~~for the period~~ both before and after 2020, as discussed in the *First Update to the Climate Change Scoping Plan*, released by ARB in May 2014 (and discussed above in Section 16.2.2) and in

response to *CBD v CDFW* as it relates to connecting Scoping Plan targets to individual projects. Any projects processed by the County ~~after 2020~~ will be required to reduce, to the extent needed and feasible, GHG emissions such that the project operates within the targets or adopted plan established at the time the project is submitted for approval, as explained below.

The County shall require the following actions for all subdivision maps submitted for approval ~~after December 31, 2020~~:

- In consultation with the PCAPCD and Placer County, the applicant shall demonstrate, based on currently adopted regulations and industry-accepted GHG calculation methods, whether operation of the subdivision would be consistent with GHG targets adopted by the State. "Adopted" means that a specific GHG reduction target, such as is currently specified in the Global Warming Solutions Act of 2006 (achieve 1990 levels by 2020), is required by state legislative action, state administrative action, by legislative action of Placer County, or an applicable qualified Climate Action Plan or similar GHG reduction plan approved by Placer County. The target or plan shall be based on a substantiated linkage between the project (or Placer County projects in general if a countywide qualified GHG reduction plan is approved) and statewide GHG reduction goals. ~~"Within GHG targets" means that the subdivision, using methods such as a comparison between No Action Taken and the subdivision as proposed scenarios, would achieve or exceed the target.~~

- If the subdivision achieves or exceeds the reduction target or plan, no further actions shall be required.

- If the subdivision does not meet the target, then measures shall be incorporated into the subdivision to reduce GHG emissions to the target or plan level and to the extent~~, if it is~~ feasible ~~to do so~~. Emissions reductions provided by these measures shall be calculated to determine if targets can be achieved. These measures may include any combination of GHG reduction actions needed to achieve the target, including:

  - Actions included in Mitigation Measure 10-2 that also reduce GHG emissions (menu of options to reduce ROG and NO_X emissions to a specified level such as trip reduction and energy management; nearly all of these measures would similarly reduce GHG emissions);

  - Actions specified in Specific Plan Section 7.6, "Climate Change Initiatives," but with mandated actions (instead of "should" or "encourage" the actions, use "shall"), such as requiring that all buildings exceed Title 24 energy-efficiency requirements by 15 percent; requiring incorporation of on-site renewable energy production to meet at least 25 percent of the subdivision's electricity needs.

  - Payment of GHG offset fees to an ARB-approved GHG reduction program. Project applicant will consent to any GHG reduction fees that may be applicable after January 1, 2020.

Significance after Mitigation

Appendix G of this document provides a toolbox of GHG reduction measures, based on this mitigation measure, with potential effectiveness of each. The reduction measures are based on the policies in the VSVSP, and additional measures, and include:

- Installing solar panels on rooftops
- Installing Energy Star® appliances instead of conventional appliances
- Third party HVAC commissioning of non-residential buildings
- Replacing low-efficacy street or building lighting with LED lighting
- Exceeding Title 24 Building Energy Efficiency Standards
- Reducing the number of propane hearths
- Adding insulating covers on all pools and spas
- Installing electric vehicle charging stations for visitors

- Replacing diesel or gasoline transit buses with electric transit buses
- Planting additional trees

A careful analysis was conducted in Appendix G of this document, and it was prepared to ensure that GHG reduction potential of these various measures, especially those with potential co-benefits, was not double counted, nor was additional credit taken for GHG reductions that would result from various regulatory actions already considered in Tables 16-2 and 16-3. As shown in Appendix G, GHG reductions from employing these and other measures could reduce GHG emissions by as much as 5,627 MT CO_2e/year in 2020 (under the "2020 buildout" scenario) and 5,097 MT CO_2e/year in 2037. The 2020 reduction of 5,627 MT CO_2e/year from the projected (Table 16-3) generation of 42,094 MT CO_2e/year would result in net GHG emissions of 36,467 MT CO_2e/year after mitigation. Compared to the NAT of 58,976 MT CO_2e/year, this results in a mitigated GHG efficiency of 38 percent below the 2020 NAT scenario. For the reasons stated previously, it is not possible to link this project-specific reduction to the statewide goal of 21.7 percent below NAT in the Scoping Plan, but it is also difficult to argue that this project conflicts with Scoping Plan targets and policies.

~~As stated above, the proposed project would achieve a reduction in greenhouse gas emissions of 24.7 percent by 2020, which would be a less than significant impact. However~~ Given the current date and timing for potential project approval (mid 2016) and the 25 year project buildout, it is doubtful that much of the project would be constructed prior to 2020. It is not known whether the proposed project would achieve threshold targets ~~identified for the years after 2020~~, because such targets do not yet exist and it would be speculative to assume what they might be and/or what regulations will be in place to help achieve them. Implementation of Mitigation Measure 16-2 would reduce GHG emissions associated with subsequent project subdivisions ~~proposed after 2020~~. However, important factors are not currently known: the GHG emissions target in effect at the time that subdivisions are submitted ~~after 2020~~; the effectiveness of regulatory actions already adopted as part of the implementation of the Global Warming Solutions Act of 2006; consideration by ARB as to whether Cap-and-Trade regulations already mitigate the emissions associated with regulated sources (fuel, electricity), and the potential for application of new regulations and their effectiveness. Further, the cost and feasibility of certain policies that would be mandated as mitigation are not known. Therefore, it would be speculative to determine that GHG impacts, if they were to occur, would be feasibly mitigated to adopted GHG target levels ~~beyond 2020~~. Further, unless Cap-and-Trade regulated sources are considered already mitigated by ARB, the project could not feasibly reduce emissions to below the 1,100 MT CO_2e/year mass emission threshold established by PCAPCD (see discussion above regarding the mitigation toolbox). For this reason, and because the project would emit a substantial level of GHG emissions, the residual impact is **potentially significant and unavoidable**.

2.3.17 Revisions to Chapter 17, "Alternatives"

Due to a changed and improved condition since publication of the DEIR, Impact 9-3 is no longer a significant and unavoidable impact (see Revisions to Chapter 9, "Transportation and Circulation," above). Therefore, as shown below, has been removed from the summary discussion of the transportation and circulation impacts associated with the Reduced Density Alternative on page 17-29 of the DEIR as follows:

> Overall, traffic impacts would be less under this alternative; however, impacts would remain great enough that most, if not all of the mitigation measures required for the proposed project would likely also be required for this alternative, In addition, significant and unavoidable impacts identified for the proposed project (Impacts 9-2, ~~9-3,~~ 9-4, and 9-5) would remain significant and unavoidable under this alternative. *(Less)*

2.3.18 Revisions to Chapter 18, "Other CEQA Sections"

To provide clarification to this issue and in response to comment O9-296, the last paragraph in Section 18.1.3, "Cumulative Impact Analysis," on page 18-7 of the DEIR is revised as follows:

18.1.3 Cumulative Impact Analysis

For purposes of this EIR, the project would result in a significant cumulative effect if:

- the cumulative effects of related projects (past, current, and probable future projects) are not significant and the incremental impact of implementing the VSVSP project is substantial enough, when added to the cumulative effects of related projects, to result in a new cumulatively significant impact; or

- the cumulative effects of related projects (past, current, and probable future projects) are already significant and implementation of the VSVSP project makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance.

This cumulative analysis assumes that all mitigation measures identified in chapters 4 through 16 to mitigate project impacts are adopted. The analysis herein analyzes <u>if the project, in combination with other related development, would result in a cumulatively significant effect before mitigation, and</u> whether, after adoption of project-specific mitigation, the residual impacts of the project would cause a cumulatively significant impact or would contribute considerably to existing/anticipated (without the project) cumulatively significant effects. Where the project would so contribute, additional mitigation is recommended where feasible.

In response to comment O8b-46, the discussion under Impact 18-6 on page 18-10 of the DEIR is revised as follows to clarify the combined effects of the contribution of other projects and the Specific Plan:

Impact 18-6: Cumulative effects on sensitive habitats.

Implementing the proposed project would result in removal and disturbance of the following sensitive habitat types: riparian, meadow, seasonal wetland, and stream corridors. Decades of growth and development, Comstock-era logging, hydrologic modification, livestock grazing, and fire suppression activities in the Tahoe-Truckee region have resulted in an overall significant cumulative effect on these sensitive habitat types. It is estimated that 75 percent of marsh habitat and 50 percent of meadow habitats in the Tahoe Basin have suffered some level of functional degradation since 1900 (USDA 2001). <u>Current development projects outlined in Table 18-2 could further contribute to losses of these sensitive habitats in the Sierra Nevada and the Tahoe-Truckee region. Developments such as those in Truckee, Alpine Meadows, and North Star could permanently degrade or remove existing riparian and meadow areas. Development projects could either remove habitat or degrade it through long-term impacts from changes in hydrology or invasive species brought in by human traffic; such a changes species composition. Considering only past and present projects, a significant cumulative impact has occurred in the region.</u>

Specific Plan impacts on sensitive habitats would be permanent (resulting from direct removal and disturbance of sensitive habitats) and temporary (resulting from Squaw Creek restoration). Construction related impacts would remove and/or disturb sensitive habitat vegetation for development, while Squaw Creek restoration impacts would temporarily remove vegetation, and then, over the long term and with Mitigation Measures 6-1a through 6-1d, increase meadow, stream, and riparian habitat within the Squaw Creek watershed and the surrounding area. Construction activities would be required to comply with existing federal, state, and local regulations and

permitting requirements that protect wetland, riparian, and other sensitive habitats. Conservation of creek, riparian, wetland, and wet meadow habitats within the plan area would occur within identified Conservation Preserves as outlined in the Specific Plan. Mitigation Measures 6-1a through 6-1d would ensure that project impacts on sensitive habitats are reduced to a less-than-significant level because these measures would ensure that the Specific Plan results in no net loss of sensitive habitats in the Sierra Nevada and the Tahoe-Truckee region (defined as jurisdictional wetlands, wet meadows, and riparian vegetation, and waters of the United States and waters of the state, as well as non-jurisdictional features considered sensitive by the County).

Future projects as detailed in Table 18-2 would be subject to similar mitigation requirements which would avoid, minimize, and mitigate for sensitive habitats in the Sierra Nevada bioregion. Climate change effects throughout the Tahoe-Truckee region could result in increased average temperatures, altered growing season timing and length, and altered timing and form of precipitation. This could in turn increase water stress on plants, shift plant species composition, increase invasive plant populations, increase fire probability and intensity, and increase flooding and erosive event (Stillwater Sciences 2012, Sierra Nevada Alliance 2010). Many Sierran meadows are dependent on snowmelt. A reduction in available spring snowpack, along with increased evaporative demand due to higher temperatures, could result in moist meadows converting to drier systems (drier meadow or upland). The loss or degradation of sensitive habitats from project-related groundwater reduction could be intensified by climate change effects in the future. However, given the uncertainties regarding the timing, form, and intensity of climate change effects, particularly at a localized or regional level, it would require significant speculation to make any detailed predictions regarding responses of biological systems to climate change effects. However, mitigation measures to ensure project specific impacts are addressed, including long-term monitoring of wetland and riparian areas potentially affected by operational groundwater reductions along Squaw Creek (the monitoring period extends at least 5 years after full project buildout, or at least an estimated 30-years into the future) and corrective actions if adverse effects are observed, would capture and address potential future climate change effects.

Based on the no net loss standard required by state and federal laws as well as County policies, and mitigation measures included in the is DEIR, the Specific Plan would not contribute considerably to the overall significant cumulative effect on sensitive habitats in the Tahoe-Truckee Region. This cumulative impact would be **less than significant**.

To provide clarification, Mitigation Measure 18-20 on pages 18-23 and 18-24 of the DEIR is revised as follows:

Mitigation Measure 18-20: Implement Mitigation Measures 9-2a through 9-2d.

Implementation of Mitigation Measures 9-2a through 9-2d, which include conducting traffic management along Squaw Valley Road, would reduce this cumulative impact to a **less-than-significant** level because operations would be restored to acceptable levels. The traffic management procedures recommended for the Squaw Valley Road/Wayne Road and Squaw Valley Road/Squaw Creek Road intersections were analyzed to determine how the LOS would change. With the use of traffic management personnel, they would each operate similar to a two-phased signalized intersection. Traffic conditions would be improved at the Squaw Valley Road/Far East Road/Christy Hill Road intersection by restricting turning movements on Far East Road during peak periods. Based on the cumulative plus project traffic volumes and anticipated right-of-way allocations, these intersections would operate at LOS C or better with traffic management.

To correct an error (significant impacts were not bolded as they should be), Table 18-6 on page 18-28 of the DEIR is revised as follows:

Table 18-6 State Highway Segment Level of Service – Cumulative Conditions

Segment [1]	LOS Standard	Cumulative No Project Conditions									Cumulative Plus Project Conditions								
		Winter Saturday a.m. Peak Hour			Winter Sunday p.m. Peak Hour			Summer Friday p.m. Peak Hour			Winter Saturday a.m. Peak Hour			Winter Sunday p.m. Peak Hour			Summer Friday p.m. Peak Hour		
		Peak Direction & Volume (veh/hr)	V/C/ Avg. Speed	LOS	Peak Direction & Volume (veh/hr)	V/C/ Avg. Speed	LOS	Peak Direction & Volume (veh/hr)	V/C/ Avg. Speed	LOS	Peak Direction & Volume (veh/hr)	V/C/ Avg. Speed	LOS	Peak Direction & Volume (veh/hr)	V/C/ Avg. Speed	LOS	Peak Direction & Volume (veh/hr)	V/C/ Avg. Speed	LOS
SR 89 south of Deerfield Dr	F / D [2]	SB 950	0.59 30.1	E	NB 1460	0.95 25.3	E	NB 830	0.51 29.1	E	SB 1005	0.62 29.5	E	**NB 1558**	**1.02 24.4**	**F**	**NB 991**	**0.61 26.7**	**E**
SR 89 between West River St and Squaw Valley Rd	E	SB 1200	0.75 44.5	E	NB 1550	1.02 41	F	NB 830	0.52 45.1	E	SB 1259	0.78 43.9	E	**NB 1656**	**1.09 40**	**F**	NB 1014	0.64 42.5	E
SR 89 between Squaw Valley Rd and Alpine Meadows Rd	E	NB 770	0.51 36.2	E	NB 761	0.51 36.6	E	NB 801	0.51 35.3	E	NB 803	0.53 35.9	E	NB 771	0.51 36	E	SB 928	0.59 33.5	E
SR 89 between Alpine Meadows Rd and SR 28	E	NB 1050	0.65 35.3	E	SB 910	0.57 34.9	E	SB 820	0.52 33.6	E	NB 1087	0.68 34.9	E	SB 962	0.60 34.5	E	SB 952	0.60 31.8	E
SR 89 south of SR 28	E	NB 840	0.55 N/A[3]	E	SB 620	0.43 N/A[3]	D	SB 990	0.61 N/A[3]	E	NB 847	0.55 N/A[3]	E	SB 634	0.44 N/A[3]	D	SB 1036	0.64 N/A[3]	E
SR 28 east of SR 89 [4]	D	Both 1430	0.87 N/A	E	Both 1410	0.86 N/A	D	Both 1750	0.98 N/A	E	Both 1463	0.89 N/A	E	Both 1454	0.89 N/A	D	**Both 1910**	**1.07 N/A**	**F**

Notes: N/A = not applicable; LOS = level of service; NB = northbound; SB = southbound; vph = vehicles per hour. This table replaces percent time spent following (PTSF) in favor of V/C (Volume to Capacity) ratio for purposes of impact identification. **Bolded** cells represent significant impacts.

1 Refer to Section 9.1.7, "Level of Service," for description of facility types and analysis methods.
2 LOS F applies as the LOS standard for winter conditions, while LOS D applies as LOS standard for summer Friday conditions.
3 Average travel speed not applicable for Class II two-lane highways.
4 Segment analyzed using Chapter 16 (Urban Street Facilities) of the HCM (Transportation Research Board 2010) with LOS traffic volumes thresholds in DEIR Table 9-7.

Source: Appendix G

In response to comment L2-2, Impact 18-26 on pages 18-30 and 18-31 of the DEIR is revised as follows with respect to PCAPCD's thresholds:

Impact 18-26: Cumulative emissions of ozone precursors.

The nonattainment designation of Placer County with respect to ozone is the result of the emissions of ozone precursors, reactive organic gasses (ROG), and oxides of nitrogen (NO_X), generated by cumulative development projects in the region, as well as from transport of these same pollutants from outside the region. When all sources of ROG and NO_X throughout the region are combined they can result in a severe ozone problem, as expressed by the nonattainment status with respect to the California Ambient Air Quality Standards (CAAQS) and/or National Ambient Air Quality Standards (NAAQS) for ozone, which is considered to be a significant cumulative impact.

In its *CEQA Air Quality Handbook*, ~~which has not been formally adopted by its Board of Directors,~~ the Placer County Air Pollution Control District (PCAPCD) ~~offers mixed guidance about how to determine whether an individual project's emissions of ozone precursors are cumulatively significant. On the one hand, PCAPCD~~ recommends the use of 10 pounds per day (lb/day) as the cumulative level at which a project should mitigate for ~~impact threshold for evaluating~~ operational emissions of ROG and NO_X (PCAPCD 2012:2-3). ~~PCAPCD's recommendation to use 10 lb/day is based on its New Source Review rule (Rule 502) that applies to stationary sources and requires Best Available Control Technology (BACT) to be implemented on any stationary source that emits more than 10 lb/day of ROG and NO_X (PCAPCD 2012:2-3 and 2-4). On this basis, PCAPCD recommends that any project that emits more than 10 lb/day should implement mitigation measures to reduce cumulative impacts (PCAPCD 2012:2-4). On the other hand, also in its CEQA guide, PCAPCD states that it~~

> ~~does not recommend the use of this cumulative threshold to determine the need for an EIR. Rather, this threshold is used by [PCAPCD] to recommend mitigation measures to offset the project's cumulative air quality impacts. Local governments acting as lead agencies have the responsibility to determine the type of environmental document that should be prepared and should determine when a project's impacts, even after complying with the [PCAPCD's] offsite and/or fee programs, are potentially significant as defined under CEQA. (PCAPCD 2012:2-4).~~

~~PCAPCD provides no guidance about what level of mitigation is sufficient for a land use development project that exceeds 10 lb/day or whether a project that reduces its emissions to less than 82 lbs/day would result in a cumulatively considerable contribution to the nonattainment ozone status of the region. PCAPCD leaves decisions on this matter to the discretion of the lead agency (PCAPCD 2012:1-3 and 1-4). (Furthermore, PCAPCD's guide does not include any discussion about cumulative emissions from construction activity.)~~

~~For this analysis, the County exercises this discretion and employs the approach recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD) and presented in its *CEQA Guide to Air Quality* (SMAQMD 2014). This guidance is the same as employed among air districts throughout California, including the Bay Area Air Quality Management District and the San Joaquin Valley Air Pollution Control District. Like these other districts, SMAQMD recognizes that nonattainment of the CAAQS and NAAQS is based on cumulative development that has affected air quality. The project impact threshold is the same as the cumulative impact threshold, recognizing the cumulative nature of the impact. Invariably, if a project complies with the project threshold, the cumulative impact is also less than significant. In large part, this assumption is based on overall inputs to the air quality attainment plans for the various air districts, which consider general plans of the jurisdictions within their boundaries and how well planned development, coupled with improving emissions standards and mitigation, can result in long term attainment of air quality standards.~~

~~SMAQMD's guidance about how to address potential cumulative impacts of ozone precursors is also relevant to the proposed project because SMAQMD also has jurisdiction over portions of the Sacramento federal nonattainment area for ozone and is one of the key agencies that developed,~~

~~adopted, and is now implementing the *Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (Ozone Attainment Plan) (Sacramento Region Air Districts 2013:1-5), as discussed in Chapter 10, "Air Quality." In its approach, SMAQMD considers a project's individual emissions that do not exceed its Board-adopted project-level, mass emission thresholds (i.e., 85 lbs/day for construction emissions of NO_x, 65 lb/day for operational emissions of NO_x, and 65 lbs/day for operational emissions of ROG) to not result in a cumulatively considerable contribution to a significant cumulative impact (SMAQMD 2014:8-1). As explained above, the mass emission thresholds SMAQMD uses for project-level analysis are also used to determine whether a project would be cumulatively significant.~~

~~Herein, the County applies the same reasoning in its evaluation of ozone precursors generated by the proposed Village at Squaw Valley Specific Plan.~~ As described in Impacts 10-1 and 10-2, project construction emissions would not exceed significance thresholds for any pollutants, but operational emissions of ozone precursors, ROG, and NO_x, would be substantially higher than PCAPCD's cumulative threshold~~s established for ROG and NO_x~~. ~~The significance~~ PCAPCD's cumulative threshold for operational emissions of ROG and NO_x is ~~82~~ 10 lb/day; at buildout, project operation would emit 181.7 lbs/day of ROG and 86.5 lbs/day of NO_x during the summer ozone season. ~~With implementation of Mitigation Measure 10-2, construction and operation of land uses and facilities developed under the Specific Plan would not generate emission of ozone precursors that exceed PCAPCD's mass emission thresholds. Furthermore, total development allowable under the Specific Plan would be within (and substantially less) than overall development allowable by current zoning and the land use designations established in the County General Plan and the Squaw Valley General Plan and Land Use Ordinance. This is noteworthy because, as with other air districts, the amount of development anticipated by the County General Plan, as well as the general plans of other counties and cities located in the region, is used to inform air quality planning efforts including the Ozone Attainment Plan.~~ Thus, this impact would be **cumulatively significant**. Because Mitigation Measure 10-2 includes a menu of actions that, in combination, would reduce the project's net emissions of ROG and NO_x to less than ~~82~~ 10 lb/day, this cumulative impact would be reduced to a **less-than-significant** level.

In response to several comments and as discussed in the Master Response regarding noise, Mitigation Measure 11-5 was revised to require the installation of an RHMA on top of the existing conventional asphalt of a segment of Squaw Valley Road, which also mitigated cumulative traffic noise impacts. Accordingly, Impact 18-32 on pages 18-34 and 18-35 of the DEIR is revised as follows:

Impact 18-32: Cumulative long-term ambient noise levels.

Cumulative noise levels could be affected by additional build-out of surrounding land uses and increases in vehicular traffic on affected roadways. Several new large developments (e.g., Gregory Creek Subdivision, Coldstream Specific Plan, Joerger Ranch Specific Plan) and others (see Table 18-2 for a complete list) are planned in the Tahoe Basin, surrounding the project area.

These projects could result in additional traffic-related noise on surrounding roadways and would contribute to an already existing cumulative traffic-noise condition (i.e., existing traffic-noise levels exceed applicable noise standards throughout the Tahoe Basin). Therefore, and as shown in Table 18-7, roadways under the cumulative conditions exceed Placer County noise standards as well. Thus, project-generated traffic under the cumulative condition would further increase traffic noise (Table 18-7). In addition, because the project would cause traffic-related noise increases on certain roadways during certain circumstances (i.e., Squaw Valley Road during certain peak days in the summer) to exceed applicable standards where they currently do not, the project would contribute to the cumulative impact related to traffic-noise in the Olympic Valley (i.e., traffic noise levels on Squaw Valley Road could result in noise increases of up to 4.3 A-weighted decibels [dBA] as shown in Table 18-7). However, Mitigation Measure 11-5 would require the installation of a rubberized hot mix asphalt overlay (RHMA) on portions of Squaw Valley Road that would experience the greatest noise increases. Implementation of this mitigation measure would reduce traffic-related noise on Squaw

Valley Road (the road experiencing the highest traffic-noise increase and thus responsible for the significant impact) by at least 4 dB. As such, Mitigation Measure 11-5 would reduce the project-generated traffic-noise level increase to below 1 db, a level that is imperceptible to the human ear. Traffic noise level increases on other affected roadways would range from 0.5 to 1.6 dB (Table 18-7). A 1-2 dB increase is generally not perceptible. Further, per Placer County Municipal Code, a 5 dB increase in noise would be considered substantial. Therefore, as project-generated traffic noise levels on Squaw Valley Road would be reduced to below 1 dB and all other affected roadways would not experience a traffic-noise increase of more than 2 dB, the project would not contribute substantially to the existing cumulative traffic-noise levels. The project's traffic noise impact would be reduced to a **less-than-significant** level.

With regards to stationary noise increases, the proposed project would result in land use development that typically includes stationary noise sources such as noise from HVAC units, electrical generators, parking lots, commercial loading docks, and outdoor recreational activities. However, these noise sources would be isolated to the project area and therefore would not combine with other stationary noise sources in the geographic scope of cumulative impacts. Impacts from stationary noise sources would be considered **less than significant.**

~~Nonetheless, increases in traffic noise would exceed applicable noise standards on roads that currently comply with Placer County noise standards. Therefore, project operation would result in a considerable contribution to long term noise. While implementation of Mitigation Measure 11-5 would reduce interior noise from Squaw Valley Road at new sensitive receptors, no feasible mitigation exists to reduce the project's impacts to existing sensitive land uses (i.e., residences located within the 60 dBA day-night average noise level [L_{dn}] noise contour of Squaw Valley Road), which would be exposed to exterior noise levels that exceed applicable Placer County noise standards, although only during a select number of days during summer. Therefore, this cumulative impact would be **significant and unavoidable.**~~

Mitigation Measures

~~There are no additional feasible mitigation measures available to reduce this cumulative impact to a less-than-significant level.~~ No additional mitigation is required.

Due to a changed and improved condition since publication of the DEIR, Impact 9-3 on page 18-52 of the DEIR is no longer a significant and unavoidable impact. Therefore, as shown below, it has been removed from the list of significant and unavoidable impacts in Section 18.2, "Significant Environmental Effects Which Cannot Be Avoided."

~~Impact 9-3: Impacts to Caltrans intersections.~~

~~The project would exacerbate unacceptable operations at the SR 89/Alpine Meadows Road intersection during all three analysis peak hours. This would be a significant impact. Mitigation Measure 9-3 requires the construction of the planned traffic signal at this intersection. Once the signal is operational, the effect of added vehicle trips from the project would be less than significant; however, the timing of installation is not known at this time and is not entirely within the County's control (joint effort with Caltrans). Therefore, this impact would be **significant and unavoidable** in the short-term if the planned traffic signal is not constructed prior to the project generating sufficient vehicle trips to generate an increase in intersection delay of more than 2.5 seconds.~~

Due to the addition of a new mitigation measure, Impact 11-5 on page 18-53 of the DEIR is no longer a significant and unavoidable impact. Therefore, as shown below, it has been removed from the list of significant and unavoidable impacts in Section 18.2, "Significant Environmental Effects Which Cannot Be Avoided."

~~Impact 11-5: Exposure of new and existing sensitive receptors to operational project-generated transportation noise sources (potentially significant for existing sensitive receptors).~~

~~Implementation of the project could expose existing and future planned sensitive receptors to transportation noise levels that exceed the Placer County day-night average sound level (L_{dn}) standard of 60 dBA at the property line of residential land uses. This impact would be significant.~~

~~Implementation of Mitigation Measure 11-5 would reduce interior noise from Squaw Valley Road at new sensitive receptors; however, implementation of this mitigation measure would not ensure that exterior noise levels would comply with Placer County levels of 60 dBA L_{dn} at outdoor activity areas (e.g., balconies, porches). Therefore, as balconies and porches could potentially be included at future sensitive receptors, and it would be considered infeasible and impractical to disallow the construction of these outdoor activity areas, future planned sensitive receptors could potentially be exposed to exterior noise levels that exceed Placer County noise levels for transportation noise sources.~~

~~Existing sensitive receptors are located within the 60 dBA L_{dn} noise contour of Squaw Valley Road and would continue to be exposed to noise levels that exceed Placer County noise standards (i.e., 60 dBA L_{dn}) during peak traffic conditions. Further, during the summer, noise along Squaw Valley Road would increase such that the current noise level that modelling indicates is in compliance with Placer County exterior noise levels, the addition of project generated transportation noise would result in exceedance of the 60 dBA L_{dn} standard for transportation noise. Exterior noise levels at existing noise sensitive residences could only be remediated by relocating roadways, building sound walls, providing buffer zones, etc., but in the case of the project, this would not be feasible. Homes are located adjacent to the roadway edge and relocating the road would require removal of homes, or if moved in the other direction, would result in loss of habitat and other potential impacts. In most locations, the homes are too close to the roadway to add sound walls without affecting safe access to the road (line of sight would be compromised) or views. Further, it is likely that interior noise is within standards of 45 dBA L_{dn}, given the colder climate and likelihood that many homes already have dual pane windows and insulation. Typical construction of this type provides at least 25 dB exterior to interior attenuation. Therefore, exterior noise levels would need to be at least 71 dBA for the interior noise standards to be exceeded, which would mean that an existing residence would need to be located 20 feet from the centerline of Squaw Valley Road, and this does not currently exist. Thus, existing sensitive land uses (i.e., residences located within the 60 dBA L_{dn} noise contour of Squaw Valley Road) would be exposed to exterior noise levels during days with peak traffic conditions that exceed applicable Placer County noise standards. This impact would remain significant and unavoidable.~~

Due to the addition of a new mitigation measure, Impact 18-32 on page 18-57 of the DEIR is no longer a significant and unavoidable impact. Therefore, as shown below, it has been removed from the list of significant and unavoidable impacts in Section 18.2, “Significant Environmental Effects Which Cannot Be Avoided.”

~~Impact 18-32: Cumulative long-term ambient noise levels.~~

~~Cumulative noise levels could be affected by additional build-out of surrounding land uses and increases in vehicular traffic on affected roadways. Several new large developments are planned in the Tahoe Basin, surrounding the project area. These projects could result in additional traffic-related noise on surrounding roadways and would contribute to an already existing cumulative traffic noise condition (i.e., existing traffic noise levels exceed applicable noise standards throughout the Tahoe Basin). Therefore, and as shown in Table 18-7, roadways under the cumulative conditions exceed Placer County noise standards as well. Thus, project-generated traffic under the cumulative condition would further increases traffic noise (Table 18-7). In addition, because the project would cause traffic-related noise increases on certain roadways during certain circumstances (i.e., Squaw~~

~~Valley Road during the summer) to exceed applicable standards where they currently do not, the project would contribute to the cumulative impact related to traffic noise in the Olympic Valley (i.e., traffic noise levels on Squaw Valley Road could result in noise increases of up to 4.3 A-weighted decibels [dBA] as shown in Table 18-7). With regards to stationary noise increases, the proposed project would result in land use development that typically includes stationary noise sources such as noise from HVAC units, electrical generators, parking lots, commercial loading docks, and outdoor recreational activities. However, these noise sources would be isolated to the project area and therefore would not combine with other stationary noise sources in the geographic scope of cumulative impacts. Nonetheless, increases in traffic noise would exceed applicable noise standards on roads that currently comply with Placer County noise standards. Therefore, project operation would result in a considerable contribution to long-term noise; this cumulative impact would be significant.~~

~~While implementation of Mitigation Measure 11-5 would reduce interior noise from Squaw Valley Road at new sensitive receptors, no feasible mitigation exists to reduce the project's impacts to existing sensitive land uses (i.e., residences located within the 60 dBA L_{dn} noise contour of Squaw Valley Road), which would be exposed to exterior noise levels that exceed applicable Placer County noise standards. Therefore, this cumulative impact would be~~ **~~significant and unavoidable~~**~~.~~

In response to comment O12b-2 and to clarify the growth-inducing analysis, the first, second, and third full paragraphs on page 18-61 of the DEIR are revised as follows:

The construction workers and project-related employees, as well as economic activities associated with the project operations, could result in indirect growth in the region. Demands for tourist-related goods and services (e.g., restaurants, grocery for employees, and other tourist-related activities) could result in demand for new restaurants and other commercial activities. Whether or not this would lead to construction of new facilities or reuse/expansion/more efficient use of existing facilities is speculative. However, if new construction were to occur in the region, it could result in potential environmental impacts depending on where the new construction would occur. Although it would be speculative to forecast the specific locations where development potentially related to indirect growth may occur, it is reasonable to assume that such development may be in proximity to the project. Several projects are proposed in nearby Truckee, Northstar, Alpine Meadows, Tahoe City, and the west shore of Lake Tahoe. While these projects may or may not absorb demands indirectly generated by the project, the environmental impacts associated with these projects are typical of what could occur with development that could be caused by induced growth in the region. The cumulative analysis in Section 18.1, "Cumulative Impacts," fully addresses impacts of development in these areas. These are the types of impacts that could be caused by induced growth from the project, and in fact some of these projects may, in part, be developed to meet demand associated with project-induced growth. As previously discussed, the discretion over whether these impacts occur is the responsibility of those lead agencies that consider approval of those projects.

The project would increase demand for public services and utilities, including water supply, wastewater (collection, treatment, and disposal), storm drainage, electrical power, propane, fire protection, snow removal, and recreational facilities. In fact, some infrastructure and facilities providing these services would be modified as part of the project. Potential impacts to these public services and utilities are discussed in Chapter 14, "Public Services and Utilities," which also notes that increased demands for public services and utilities would be based on population-based demands. The project would not extend infrastructure to areas outside the project boundaries that are not already served, nor would it generally provide additional capacity~~, in general~~ over and above that needed to serve the proposed project.

The exceptions are water and sewer. As a result of the project, the wellfield serving the project (and Olympic Valley in general) will need to be redesigned to more evenly distribute the locations within the Valley where extraction occurs. Without this redesign, the wellfield would likely not be adequate to serve the project, as well as other development expected to occur in the Valley over the 25-year

project development horizon. Redesign of the wellfield would, therefore, remove a significant obstacle to growth. The amount of other growth that could occur in the Valley without the redesign (if the project did not support the SVPSD's implementation of the redesign) has not been determined; however, it is anticipated that additional wells and potential reorganization of the wellfield would be required for any proposed development of substantial size. Moreover, the project would not assist the SVPSD with funding to install more wells than required to serve the proposed development, and subsequent projects would be required to fund (or construct) wells, as needed, following the proposed wellfield reorganization. It is anticipated that the upgrade of the sewer trunk line implemented to support the proposed project would be sized to also accommodate ~~full~~ estimated build out of the SVGPLUO so as to avoid the need for future upgrades to the line, or installation of new lines to provide capacity for future development (see further discussion of this issue under Impact 14-2 in Chapter 14, "Public Services and Utilities" and in the cumulative impact analysis's list of foreseeable other projects, Table 18-2). As such, the line would have capacity in excess of the demand anticipated ~~for~~ to be required to serve the proposed project and would remove sewer line capacity as an obstacle to growth in Olympic Valley. The impacts of this growth (in addition to other regional growth) are described in Section 18.1, "Cumulative Impacts."

2.3.19 Revisions to Chapter 19, "Report Preparers"

None

2.3.20 Revisions to Chapter 20, "References and Persons Consulted"

As a result of text revisions made to clarify one of the sources of population data used in the DEIR, the following reference is added to Chapter 20, "References and Persons Consulted," under the heading "5 Population, Employment, and Housing" beginning on page 20-2 of the DEIR:

5 POPULATION, EMPLOYMENT, AND HOUSING

Fisch, Alex. Senior Planner. Placer County Planning Services Division, Auburn, CA. 2014—data provided to Ascent Environmental regarding Olympic Valley Estimated Peak Overnight Population.

As a result of text revisions made in response to comment letter O8b, the following references are added to Chapter 20, "References and Persons Consulted," under the heading "6 Biological Resources" beginning on page 20-3 of the DEIR:

6 BIOLOGICAL RESOURCES

DeBell. D.S. 1990. *Populus trichoarpa* Torr.&Gray.; Black Cottonwood. In: Silvics of North America, V2, Hardoods. U.S. Forest Service, U.S. Department of Agriculture. Available: http://www.na.fs.fed.us/pubs/silvics_manual/volume_2/populus/trichocarpa.htm. Accessed August 6, 2015.

Lite, S.J. and J.C. Stromberg. 2005. Surface water and ground-water thresholds for maintaining *Populus–Salix* forests, San Pedro River, Arizona Biological Conservation 125 (2005) 153–167.

Mahoney, John M. and Stewart G. Rood. 1998. Streamflow Requirements for Cottonwood Seedling Recruitment – An Integrative Model. Wetlands, Vol. 18, No. 4, December, pp. 634-645

Rood, Stewart G. and John M. Mahoney. 1990. Collapse of Riparian Poplar Forests Downstream for Dams on Western Prairies: Probably Causes and Prospects for Mitigation. Environmental Management Vol. 14, No. 4, pp. 451-464.

Sierra Nevada Alliance. 2010. Sierra Climate Change Toolkit; planning ahead to protect Sierra Natural Resources and Rural Communities. 3rd edition. 123 pp.

Stillwater Sciences. 2012. *A Guide for Restoring Functionality to Mountain Meadows of the Sierra Nevada. Technical Memorandum*. Prepared by American Rivers, Nevada City, CA. 52 pp.

Stromberg, J.C. and D.T Patton. 1990. Riparian Vegetation Instream Flow Requirements: A Case Sutdy from a Diverted Stream in the Eastern Sierra Nevada, California, USA. Environmental Management 14: 185-194.

_____. 1992. Mortality and Age of Black Cottonwood Stands Along Diverted and Undiverted Streams in the Eastern Sierra Nevada, California. Madrono 39: 205-223.

_____. 1996. Instream Flow and Cottonwood Growth in the Eastern Sierra Nevada of California, USA. Regulated Rivers: Research and Management 12 (1): 1-12.

In response to comment O1-20, the following USFWS references on page 20-7 of the DEIR are revised as follows, and a new reference is added:

6 BIOLOGICAL RESOURCES

_____. 2014a. List of Federal Endangered and Threatened Species that Occur in or may be Affected by Projects in the Tahoe City, USGS 7.5-Minute Quadrangle. Document Number: 140918120932. An online database for building lists of species that may be affected by projects in specific counties of quadrangles. Available: www.fws.gov/sacramento/ es_species/Lists/es_species-lists_quad-finder_quick listcfm?ID=511B. ~~Last updated September 18, 20114.~~ Accessed September 18, 2014.

_____. 2014b (April 29). Endangered and Threatened Wildlife and Plants; Endangered Species Status for Sierra Nevada Yellow- Legged Frog and Northern Distinct Population Segment of the Mountain Yellow-Legged Frog, and Threatened Species Status for Yosemite Toad. Final Rule. Federal Register. Vol 79. No. 82. 50 CFR Part 17 RIN 1018–AZ21.

_____. 2014c. List of Federal Endangered and Threatened Species that Occur in or may be Affected by your proposed project. Consultation Tracking Number: 08ENVD00-2014-SLI-0364. An online database for building lists of species that may be affected by projects in specific counties of quadrangles. Available at: http://www.fws.gov/nevada/es/ipac.html. Accessed September 18, 2014.

As a result of text revisions made in response to comment L4-32, the following reference is added to Chapter 20, “References and Persons Consulted,” under the heading “14 Public Services and Utilities” beginning on page 20-17 of the DEIR:

14 PUBLIC SERVICES AND UTILITIES

Farr West Engineering. 2014 (November 17). Squaw Valley Public Service District VSVSP Sewer Capacity Analysis. Prepared for Squaw Valley Public Service District. Available: http://www.svpsd.org/documents.

As a result of text revisions made in response to comment O8b-46, the following references are added to Chapter 20, "References and Persons Consulted," under the heading "18 Other CEQA Sections" beginning on page 20-23 of the DEIR:

18 OTHER CEQA SECTIONS

Sierra Nevada Alliance. 2010. Sierra Climate Change Toolkit; planning ahead to protect Sierra Natural Resources and Rural Communities. 3rd edition. 123 pp.

Stillwater Sciences. 2012. *A Guide for Restoring Functionality to Mountain Meadows of the Sierra Nevada. Technical Memorandum*. Prepared by American Rivers, Nevada City, CA. 52 pp.