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Placer County Planning Department  
Maywan Krach, Community Development Technician  
3091 County Center Drive  
Auburn, CA 95603  
[cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

July 14, 2015

**Subject: Proposed Village at Squaw Valley Specific Plan Draft EIR**

Dear Ms. Krach:

The Friends of the West Shore appreciates this opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Proposed Village at Squaw Valley Specific Plan (“Proposed Project”). The Friends of the West Shore (FOWS) works toward the preservation, protection, and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations. FOWS represents community interests from Tahoma to Tahoe City. We are concerned with the extensive impacts the Proposed Project will have on the environment and communities in and around Squaw Valley, however our comments focus primarily on impacts that will occur within the Lake Tahoe Basin. We herein incorporate by reference comments submitted by Sierra Watch and the Friends of Squaw Valley.

03-1

First, FOWS is especially concerned with the proposed project’s “significant and unavoidable” impacts on the Level of Service (LOS) on SR 28 east of SR 89 (e.g. through Tahoe City). This area already experiences LOS F during peak periods. The Proposed Project will further exacerbate these conditions by increasing both employee and guest-related traffic through the area, yet no mitigation is offered to reduce these impacts.

03-2

Second, as identified in our detailed comments below, the DEIR fails to assess the Proposed Project’s impacts within the Lake Tahoe Basin, including but not limited to traffic congestion on all affected roadways, increased Vehicle Miles Traveled (VMT), air, water, and noise pollution (primarily from increased VMT and vehicle trips), and impacts of increased traffic and visitation on Tahoe’s recreational areas, including Emerald Bay, Bliss S.P., Lake Tahoe’s beaches, and other recreational facilities that current and future Squaw Valley guests utilize.

03-3

We hope these comments will assist Placer County with the development of a comprehensive, technically-adequate FEIR, which sufficiently examines and discloses the impacts to the Lake Tahoe Basin. Please feel free to contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) if you have any questions.

Sincerely,

Susan Gearhart,  
President

Jennifer Quashnick  
Conservation Consultant

Attachments: Correspondence with Alex Fisch, Placer County Staff, May 2015

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- Cc: Laurel Ames, Tahoe Area Sierra Club
- Ed Heneveld, Friends of Squaw Valley
- Tom Mooers, Sierra Watch
- Darcie Goodman-Collins, League to Save Lake Tahoe
- Joanne Marchetta, Tahoe Regional Planning Agency
- TRPA Governing Board
- Jennifer Montgomery, Placer County Supervisor
- Carl Hasty, Tahoe Transportation District

### I. Significant and Unavoidable Impacts to SR 28 east of SR 89

FOWS is especially concerned with the proposed project’s “significant and unavoidable” impacts on the Level of Service (LOS) on SR 28 east of SR 89 (e.g. through Tahoe City).<sup>1</sup> This area currently experiences LOS F during peak periods,<sup>2</sup> and congestion in Tahoe City has already been an important subject of community concern.<sup>3</sup> The proposed Project will exacerbate the already unacceptable conditions in this area, yet no mitigations are proposed to alleviate these impacts. The DEIR suggests that the only option could be increasing the capacity of the roadway, but because there are no plans for doing so, the impact would be “significant and unavoidable.”<sup>4</sup> However, the DEIR fails to explore other options to reduce the Proposed Project’s vehicle impacts to this area.

First, more mitigation measures are needed to reduce the Proposed Project’s overall traffic impacts (for example, see comments by Friends of Squaw Valley). Second, measures to reduce guest and employee driving to and within the Lake Tahoe Basin could include incentives for employees who carpool, free and convenient employee and guest transit to Tahoe Basin areas, employee and guest shuttles, guest services that incentivize carpools, vans, or shuttle services to popular areas in the Basin (for example, Squaw Valley could establish a fun, convenient transit option to take guests to popular attractions such as Emerald Bay), and other mechanisms to reduce the traffic impacts within the Lake Tahoe Basin (which as noted below, include more than LOS impacts to SR 28 east of SR 89).

*The FEIR needs to examine additional and meaningful options to reduce the Proposed Project’s traffic impacts to the Tahoe Basin, including ongoing monitoring and performance measures to ensure successful ongoing mitigation.*

FOWS is also concerned about the apparent lack of comments on the NOP by Lake Tahoe transportation agencies (e.g. the Tahoe Metropolitan Planning Organization [TMPO] and

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<sup>1</sup> “Because there are no available mechanisms to provide an acceptable LOS on the SR 28 and SR 89 segments in question, this impact would be significant and unavoidable.” (DEIR, p. 9-63).

<sup>2</sup> “Not reflected in the intersection LOS is the congestion created along roadways away from the key intersections. In particular, drivers on SR 89 northbound and SR 28 in both directions through the Tahoe City core area experience substantial (20 minute or more) delays due to a combination of factors including pedestrian crossings, parking maneuvers, vehicular turning movements, and bicyclists. This LOS F condition occurs on peak summer days (generally early July through mid-August) from approximately 10:00 AM to 4:00 PM.” (Tahoe City Mobility Plan, p. 5).

<sup>3</sup> <http://www.tahoemtpo.org/OnOurWay/projects/TC-Mobility%20Existing%20Conditions.pdf>

<sup>4</sup> i.e. See public comments on Fanny Bridge project (Final EIR/S/EA) at:

<http://www.trpa.org/document/projects-plans/>

<sup>5</sup> “The *State Route 89 Transportation Corridor Concept Report* (Caltrans 2012b) identifies the segment of SR 89 between Deerfield Drive and West River Street as a concept four-lane conventional highway. The document lists a conceptual widening from two to four lanes. However, such a widening project is not currently included in any adopted planning documents or fee programs.

No capacity-increasing improvements are proposed for the segment of SR 28 east of SR 89 according to the *State Route 28 Transportation Corridor Concept Report* (Caltrans 2012c)...Because there are no available mechanisms to provide an acceptable LOS on the SR 28 and SR 89 segments in question, this impact would be significant and unavoidable.” (DEIR, p. 9-63).

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Tahoe Transportation District (TTD)) and the Tahoe Regional Planning Agency (TRPA), given the multiple impacts the Proposed Project will have *within the Lake Tahoe Basin*.

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cont.

*We request Placer County initiate consultation with these agencies as soon as possible, as required by CEQA (see below).*

## II. Failure to adequately analyze impacts to the Lake Tahoe Basin

### A. Consistency with Regional Land Use Plans:

CEQA requires an EIR to examine project impacts from both a local and regional perspective. CEQA further requires that: *“Special emphasis should also be placed on environmental resources that are rare or unique to that region and would be affected by the project.”*

#### 15125. ENVIRONMENTAL SETTING

(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.

(b) When preparing an EIR for a plan for the reuse of a military base, lead agencies should refer to the special application of the principle of baseline conditions for determining significant impacts contained in Section 15229.

(c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.

(d) The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan or State Implementation Plan, area-wide waste treatment and water quality control plans, regional transportation plans, regional housing allocation plans, regional blueprint plans, plans for the reduction of greenhouse gas emissions, habitat conservation plans, natural community conservation plans and regional land use plans for the protection of the Coastal Zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica Mountains.

03-6

However, as noted in our comments, the DEIR fails to adequately assess and disclose all project-related impacts to the Lake Tahoe Basin, which not only qualifies as a “rare or unique” environmental resource,<sup>5</sup> but is also specifically listed in CEQA among areas where the EIR *“shall discuss any inconsistencies between the proposed project and applicable general plans...and regional land use plans for the protection of the...Lake Tahoe Basin.”* (§15125 (d)). As a result, the DEIR fails to meet CEQA requirements. The DEIR also includes no analysis of the impacts from increased use of in-Basin recreational

<sup>5</sup> See TRPA Bistate Compact. [http://www.trpa.org/wp-content/uploads/Bistate\\_Compact.pdf](http://www.trpa.org/wp-content/uploads/Bistate_Compact.pdf).

For example, Article I (A)(3) states: “a) It is found and declared that:...(3) The region exhibits unique environmental and ecological values which are irreplaceable.”

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areas and facilities by Squaw Valley guests (e.g. as noted in our transportation comments, visitors in the North Tahoe regional area frequently visit many in-Basin recreational areas).

*The FEIR needs to fully analyze and disclose all impacts to TRPA threshold standards, and federal, state, and local standards applicable within the Lake Tahoe Basin, including but not limited to transportation (including LOS and VMT increases on in-Basin highways and arterial roadways), air quality (e.g. pollutant emissions within the Lake Tahoe Air Basin), and recreation (e.g. impacts and conflicts that will result from additional guest visits to recreation areas within the Lake Tahoe Basin in relation to recreational capacity and user experience of these areas). Project-related and cumulative impacts need to be addressed.*

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cont.

**B. Regional Significance:**

As required by CEQA (§15206(b)), a proposed project must be identified as having statewide, regional, or areawide significance if the project meets any of the following criteria:

“(4)(A): A project for which an EIR and not a Negative Declaration was prepared which would be located in and would substantially impact the following areas of critical environmental sensitivity: ...The Lake Tahoe Basin.”

Yet the DEIR fails to note the proposed project as having statewide, areawide, or regional significance. We also cannot locate any information regarding consultation with the Tahoe Regional Planning Agency/Tahoe Metropolitan Planning Organization (TRPA/TMPO) and the Tahoe Transportation District (TTD), as required by CEQA (i.e. “transportation agencies affected by the project”). § 21092.4.<sup>6</sup> Transportation planning agencies within the Tahoe Basin must be consulted for this project (i.e. the DEIR does disclose the ‘significant and unavoidable’ impacts to LOS on SR 28 east of SR 89, although other impacts have not been assessed).

03-7

*The FEIR needs to include the assessment of these impacts throughout the entire Lake Tahoe Basin (e.g. including additional visitor and residential traffic in Kings Beach, Tahoe City, along the West Shore, at Emerald Bay, and around the Lake) as well as documentation of consultation with Lake Tahoe Basin transportation agencies.*

<sup>6</sup>“(a) For a project of statewide, regional, or areawide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities within their jurisdictions that could be affected by the project. Consultation shall be conducted in the same manner as for responsible agencies pursuant to this division, and shall be for the purpose of the lead agency obtaining information concerning the project’s effect on major local arterials, public transit, freeways, highways, overpasses, on-ramps, off-ramps, and rail transit service within the jurisdiction of a transportation planning agency or a public agency that is consulted by the lead agency. A transportation planning agency or public agency that provides information to the lead agency shall be notified of, and provided with copies of, environmental documents pertaining to the project.” § 21092.4

### III. Traffic Impacts in the Lake Tahoe Basin

#### A. Vehicle Miles Traveled in the Lake Tahoe Basin:

Lake Tahoe is a federally-designated Outstanding National Resource Water (ONRW).<sup>7</sup> The Lake Tahoe Bi-State Compact (cited previously) recognizes Tahoe’s unique beauty, and the importance of protecting its fragile environmental resources. For these reasons, and per CEQA’s requirements to assess impacts to the Lake Tahoe Basin (noted above), our comments on the NOP specifically requested the EIR to address the following issues (including traffic, air and water pollution, noise pollution, safety concerns, emergency access, etc.):

- ✓ How many visitors will drive to the Lake Tahoe Basin?
- ✓ How many will drive around the Lake?
- ✓ How will visitor traffic impact existing conditions in the Basin?
- ✓ How will increased traffic affect emergency access or evacuations within the Basin?
- ✓ How many will stay overnight in Tahoe City, or along Tahoe’s West Shore?

Although some information has been provided in Exhibits 9-5 through 9-8 (excerpts below), contrary to statements in the document,<sup>8</sup> the DEIR does not address our comments as it fails to identify and disclose all traffic impacts to the Tahoe Basin. In fact, there is a general failure of the document to assess and consider specific impacts to the Lake Tahoe Basin, including vehicle trips and VMT, air emissions, housing/employee impacts (according to Exhibit 9-6, 63% of the existing winter employee trips are to/from the Tahoe Basin, suggesting the Basin provides housing for a significant number of Squaw Valley employees), and recreational impacts (from increased use of recreational facilities by Squaw Valley guests). Upon release of the DEIR, we requested the following information from Placer County:<sup>9</sup>

[The Air Quality chapter states:] “Upon full buildout of the Specific Plan, which would occur no earlier than 2037, the project would generate up to 2,821 trips per day and 85,398 VMT in Placer County and/or the MCAB during the peak day of the winter season and up to 8,410 trips per day and 172,168 VMT in Placer County and/or the MCAB during the peak summer season day. (According to the analysis presented in Chapter 9, “Transportation and Circulation,” another 86,912 VMT would be generated by the project on a peak summer day that would occur outside of this area but this portion of VMT would be split among areas of Nevada, El Dorado County, and counties in the Sacramento and Bay Area regions [Fehr & Peers 2014]. Thus, mobile-source emissions associated with this portion of VMT would be split among multiple other air basins.)”

[With reference to this statement in the DEIR, we stated the following]:

I did not find any assessment of VMT in the Transportation chapter. Also, there does not appear to be a report or summary of the total VMT estimates that are presented in Appendix G (which appear to be from Fehr & Peers 2014)? Can you please point me to where this information is

03-8

<sup>7</sup> <http://www.epa.gov/region9/water/watershed/tahoe/>

<sup>8</sup> “All of the substantive environmental issues raised in the NOP comment letters and at the scoping meeting have been addressed or otherwise considered during preparation of this DEIR.” (DEIR, p. 2-10)

<sup>9</sup> See attached email correspondence with Alex Fisch, May 20-21, 2015.

located? I'm looking for the information supporting the total VMT numbers presented in the AQ chapter, as well as the VMT generated within the Lake Tahoe Air Basin.

Placer County staff responded: "The Transportation Chapter analyzed project impacts based on Level of Service criteria at threshold of significance. VMT data was developed for the project and is included in Appendix G; that VMT data was utilized for the AQ and GHG modeling done for the EIR."

However, this did not address total traffic impacts, or the related air quality impacts, to the Tahoe Basin. As noted to County staff:

Regarding the VMT issue, there is no 'total' amount in Appendix G, nor in Chapter 9. All I could locate in the appendix was the modeled values for peak 15 minute and peak 60 minute VMT along selected routes, and the only route that partially addresses in-Basin impact is the SR 28 to Alpine Meadows Drive segment (both directions); again, the output only list peak VMT values. There is no information regarding where the VMT totals referenced in the AQ chapter came from, nor estimates of the VMT generated by air basin roadway.

Further, we requested in our NOP comment that the transportation and AQ impacts within the Lake Tahoe Air Basin be analyzed, and I have not located this information in the DEIR. I hope the consultants can provide this information and identify where it is located?

Staff's response states: "If you look in Appendix H you will find the VMT information is included there, and it was derived directly from the traffic modeling." However, the only VMT information included in Appendix H is the peak 15- and 60-minute VMT for the 28/89 intersection. We could not locate any information explaining the total VMT estimates referred to in the Air Quality section, or any information which specified the total VMT generated by the project within the Lake Tahoe Air Basin. As easily viewed in the Exhibits below, the proposed Project will generate additional traffic (and VMT) within the Lake Tahoe Basin, however the DEIR's only summary and impact assessment of in-Basin impacts appears to be the LOS impacts on SR 28 east of SR 89.<sup>10</sup>

O3-8  
cont

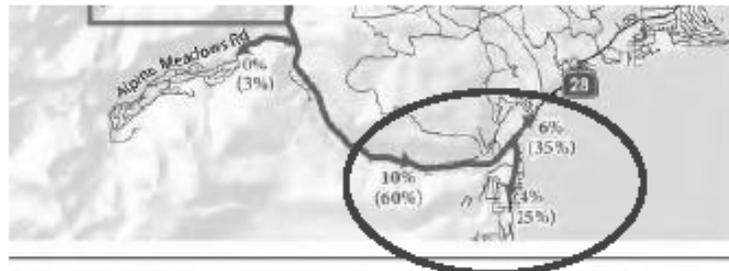


Exhibit 9-5: Winter Guest Primary and non-Primary Trip Distribution

<sup>10</sup> See pages: 30-31, 38-43-44, 79-80, 87, 94-95, 124-125, 132, 139-140, 169-170, 174, and 184-185 (as noted in the pdf reader).



Exhibit 9-6: Winter Employee Trip Distribution



Exhibit 9-7: Winter Trip Other Distribution



Exhibit 9-8: Summer Guest Trip Distribution

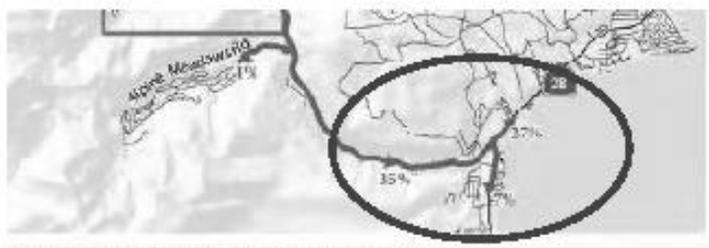
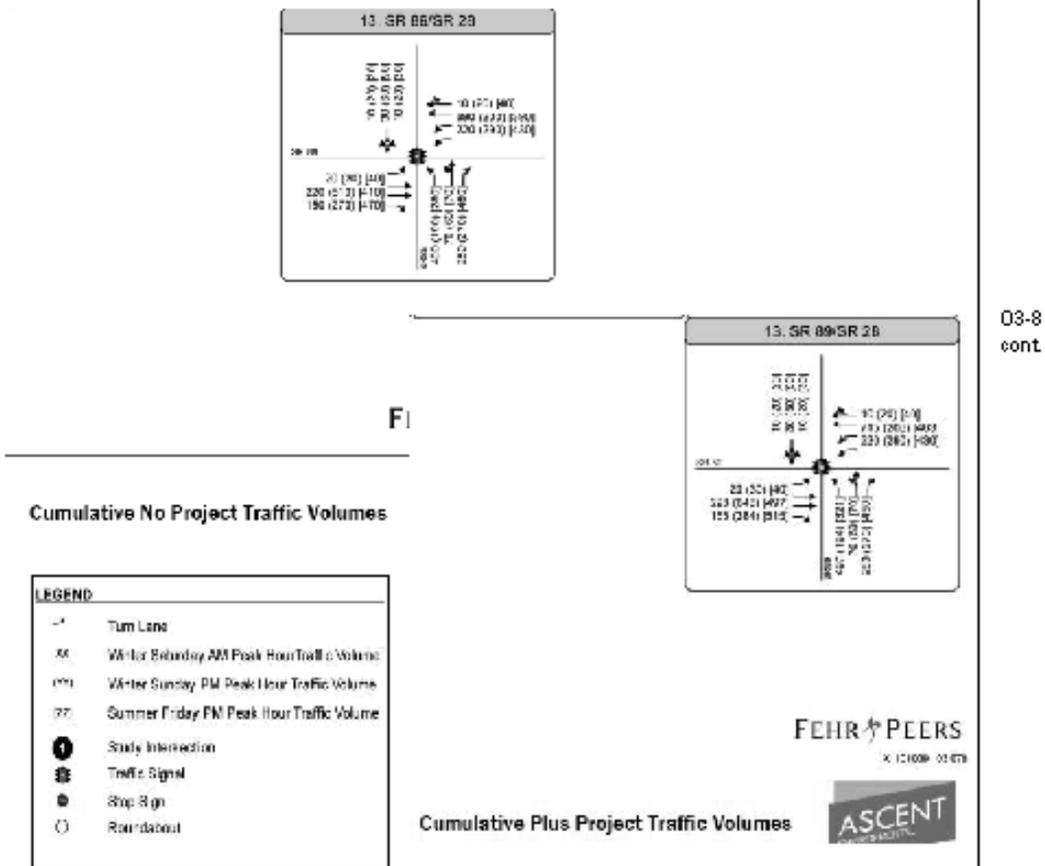


Exhibit 9-8: Summer Employee Trip Distribution

03-8  
cont.

In addition, the comparison between the “Cumulative No Project” and “Cumulative Plus Project” Traffic Volumes (excerpts below)<sup>11</sup> indicates that in the summer, the project will increase summer peak traffic volumes driving south on SR 89 (toward the West Shore) by 45 vehicles, or roughly 10%, and driving north on SR 89 (from the West Shore) toward Squaw Valley by 41 vehicles, or roughly 15%. This clearly indicates increased VMT along the West Shore as a result of the project.



03-8 cont

<sup>11</sup> DEIR, p. 8-18 to 8-22.

*The FEIR needs to assess the additional VMT generated in the Lake Tahoe Basin, including but not limited to the VMT on SR 89 North of Tahoe City, SR 89 South of Tahoe City and along the West Shore, and SR 28 through and east of Tahoe City (including Kings Beach), in order to analyze and disclose impacts of the project on the Tahoe Basin.*

03-8  
cont.

**B. Air and Water Quality Impacts from VMT in Lake Tahoe Basin:**

Air quality impacts resulting from the Proposed Project’s VMT within the Lake Tahoe Basin need to be specifically evaluated and disclosed. California has classified the Lake Tahoe Air Basin as nonattainment-transitional for ozone,<sup>12</sup> and on-road motor vehicles are one of the primary sources of ozone precursors.<sup>13</sup> California has also classified the Lake Tahoe Air Basin as nonattainment for PM<sub>10</sub>; tire wear and tear and resuspension from wheels (and road sand and salt applications) contribute particulate pollution into the atmosphere.<sup>14</sup> Atmospheric deposition of nitrogen (from NO<sub>x</sub>) and particulates also negatively impact Lake clarity.<sup>15</sup>

03-9

*In order to assess the impacts of the project on air and water quality within the Lake Tahoe Air Basin, the emissions of hydrocarbons, NO<sub>x</sub>, and PM<sub>10</sub> associated with the Proposed Project’s in-Basin VMT must be disclosed.*

**C. Extent of Survey Data**

The DEIR relies heavily on a very limited data set to estimate future trips based on travel behavior. First, the winter data are all from just one year: the winter of 2011-2012. The DEIR does not identify how this year relates to other years, or whether the data are representative of average and peak conditions. For example, the DEIR does not disclose whether visitation was up or down compared to previous years. The region had just suffered a significant reduction in visitation due to the Great Recession; it is unclear whether the number of visitors in February 2011, let alone type of tourists (e.g. where they came from, their travel behaviors once they arrive, and whether they represent the anticipated makeup of future visitors), reflect average, or maximum, visitation. Surveys regarding summertime travel behavior are even more limited (just 136 summer employee responses and 205 summer guest responses, also collected only in 2011):

03-10

The following describes each type of survey:  
*On-Mountain Skier/Boarder Winter Weekend Surveys* (see Table 9-12): 293 skiers/boarders waiting at chair lifts or in mid-mountain locations were asked five questions relating to their travel mode, trip origin/destination, and other factors. The surveys were conducted from 10 a.m. to 2 p.m. on February 18, 19, 25, and 26, 2011.

<sup>12</sup> <http://www.arb.ca.gov/regact/2013/area13/area13fio.pdf>

<sup>13</sup> [http://www.arb.ca.gov/app/emsinv/2013/emseic1\\_query.php?F\\_DIV=4&F\\_YR=2012&F\\_SEASON=A&SP=2013&F\\_AREA=AB&F\\_AB=LT&F\\_DD=Y](http://www.arb.ca.gov/app/emsinv/2013/emseic1_query.php?F_DIV=4&F_YR=2012&F_SEASON=A&SP=2013&F_AREA=AB&F_AB=LT&F_DD=Y)

<sup>14</sup> Reuter, J.E., J. Allison, S.S. Cliff, T.A. Cahill, A. Gertler, M.J. Kleeman, J. Lin, D. Niemeier and T. VanCuren. 2000. The Lake Tahoe Air Quality Research Scoping Document: Determining the Link between Water Quality, Air Quality and Transportation. July. A Cooperative Proposal by the Tahoe Regional Planning Agency and the University of California, Davis.

<sup>15</sup> [http://www.trpa.org/wp-content/uploads/TEVAL2011\\_Ch4\\_WaterQuality\\_Oct2012\\_Final.pdf](http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch4_WaterQuality_Oct2012_Final.pdf)

*Village at Squaw Valley Customer Winter Weekend Surveys* (see Table 9-13): 328 persons (non-employees) walking around the Village at Squaw Valley were asked seven questions relating to their travel mode, trip purpose, and other factors. The surveys were conducted from 10 a.m. to 5 p.m. on February 18, 19, 25, and 26, 2011.

*Village at Squaw Valley Customer Summer Weekend Surveys* (see Table 9-14): 124 persons (non-employees) walking around the Village at Squaw Valley were asked seven questions relating to their travel mode, trip purpose, and other factors. The surveys were conducted during peak periods of August 5-7, 2011.

*Squaw Valley Resort Winter and Summer Employee Surveys* (see Tables 9-12 and 9-14): A paper survey was distributed in winter and summer 2011 to all employees. A total of 106 responses from winter employees and 136 responses from summer employees were returned. The survey contained nine questions relating to work department, travel mode, work hours, residence, and other factors.

*Village at Squaw Valley Overnight Guest Winter and Summer Weekend Surveys* (see Tables 9-12 and 9-15): As part of a larger survey, 49 winter guest responses and 205 summer guest responses were obtained from a web-based lodging survey instrument. Seven questions relating to their travel mode, trip origination/destination, and other factors were asked. (DEIR, p. 9-17).

03-10  
cont.

The proposed Project is so large as to require up to 25 years of construction, and will significantly increase development in the area while drawing thousands of new visitors.<sup>16</sup> However, the assumptions regarding future visitor travel behaviors used in the traffic analysis in the DEIR are based on just one brief period of time in winter and summer; there is no information provided to assess whether this one period of time truly reflects typical/anticipated behaviors.

***The FEIR needs to provide evidence that the limited survey data represent anticipated travel behaviors and visitation, and/or include additional, targeted surveys more reflective of existing and anticipated travel behaviors and visitation, in order to assess potential traffic impacts from the Proposed Project.***

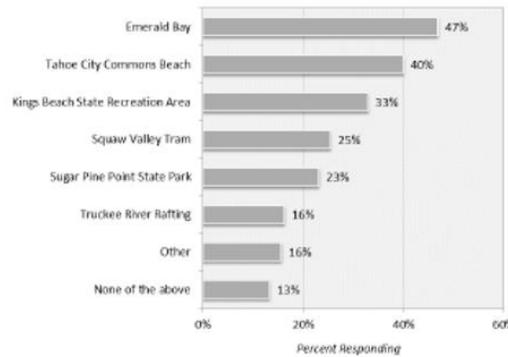
The DEIR indicates traffic will be generated on Tahoe’s west and north shores, but surveys do not address the intended location of Squaw Valley guests in the Lake Tahoe Basin. For example, as reflected by the data presented on pages 9-17 through 9-21, survey questions asked how many trips guests took outside of Squaw Valley. But there were no questions regarding *where* the trips were made to. Notably, a recent survey of visitors throughout the Tahoe/Truckee/Squaw Valley Region<sup>17</sup> found that “*The most popular attraction was Emerald Bay, with 47 percent of survey respondents indicating spending time during their visit there.*” (p. 6). In fact, more visits were made to locations within the Tahoe Basin than elsewhere:

03-11

<sup>16</sup> “Peak overnight population, assuming full occupancy of all available units, could reach 3,625 guests and employees...” (DEIR, p. 5-11).

<sup>17</sup> “Location of lodging. Overnight visitors were staying in a variety of locations, primarily in Northstar (29 percent of overnight visitors staying there), Squaw Valley (21 percent), and Tahoe City (15 percent). Other locations of lodging were Tahoe Vista (7 percent), Kings Beach (7 percent), West Shore (6 percent), and Truckee (5 percent).” NLTRA Visitor Research, 2014. P. 2.  
<http://nltra.org/documents/pdfs/RRC%20Summary%20NLTRA%20Summer%202014.pdf>

**Figure 7: Visited Attractions on Trip**



03-11  
cont.

*In order to assess the traffic, air, water, noise, scenic, and recreational impacts of the Proposed Project on the Tahoe Basin, the FEIR needs to include information regarding VMT generated within the Lake Tahoe Basin, including but not limited to VMT associated with future summer and winter guest and employee trips.*

**D. Lake Tahoe Basin LOS requirements:**

Although the DEIR discloses impacts to the “v/c ratio” for the highway segment on SR 28 east of SR 89 (p. 9-63), the DEIR includes incorrect information regarding the existing LOS in this area, and also fails to assess the impacts with regards to TRPA’s requirements for LOS. First, as noted in the Tahoe City Mobility Plan<sup>18</sup> (excerpt below), the roadway segment through Tahoe City currently operates at LOS F during peak summer periods.

03-12

“Not reflected in the intersection LOS is the congestion created along roadways away from the key intersections. In particular, drivers on SR 89 northbound and SR 28 in both directions through the Tahoe City core area experience substantial (20 minute or more) delays due to a combination of factors including pedestrian crossings, parking maneuvers, vehicular turning movements, and bicyclists. This LOS F condition occurs on peak summer days (generally early July through mid-August) from approximately 10:00 AM to 4:00 PM.” (Tahoe City Mobility Plan, p. 5).

The Proposed Project would add 160 vehicles to a roadway segment which already operates at LOS F during peak summer periods;<sup>19</sup> the FEIR should be corrected to include this statement in addition to the c/v impact.

<sup>18</sup> <http://www.tahoempower.org/OnOurWay/projects/TC-Mobility%20Existing%20Conditions.pdf>

<sup>19</sup> “It is also identified in Table 9-23 that the proposed project would add 160 vehicles (both directions combined) during the summer Friday p.m. peak hour to the segment of SR 28 east of SR 89...” (DEIR, p. 9-63).

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*The FEIR needs to be corrected to accurately reflect this.*

Also, as noted previously, CEQA requires the EIR to “discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans...[including]...regional land use plans for the protection of the ... Lake Tahoe Basin.” [Emphasis added]. The TRPA Regional Plan Goals and Policies require peak period LOS to be “E” (for no more than 4 hours) or better.<sup>20</sup> As the proposed project will worsen LOS on a roadway segment which already operates at LOS F during peak summer periods, the proposed project is inconsistent with “*the regional land use plan for the protection of Lake Tahoe*,” (in other words, the TRPA Regional Plan).

03-12  
cont.

*The FEIR needs to clearly disclose this inconsistency.*

**IV. Insufficient Mitigation:**

FOWS is not only concerned with the significant and unavoidable impacts to SR 28 and the as-yet-undisclosed increases in VMT in the Lake Tahoe Basin, but also the inadequate mitigation included to support transit. Mitigation Measure 9-7 will require that – only after ridership approaches capacity - the applicant contribute a fair share toward transit, or create a Community Service Area (CSA) or a Community Facilities District (CFD) to cover increased transit service. This mitigation specifically includes TART, which also provides regional transit service, including from the Tahoe Basin to Squaw Valley. The DEIR relies on Measure 9-7 to mitigate impacts to Caltrans highways (with the exception of SR 28 east of SR 89) to “less-than-significant.”<sup>21</sup>

03-13

**A. Defining ridership capacity:**

The DEIR does not disclose what will be used to determine when ridership approaches capacity. For example, the DEIR does not disclose whether this mitigation will apply when ridership increases capacity based on existing service (in other words, no changes to improve convenience, frequency, or reduce the cost of transit for passengers). Because

<sup>20</sup> “T-10.7 LEVEL OF SERVICE (LOS) CRITERIA FOR THE REGION’S HIGHWAY SYSTEM AND SIGNALIZED INTERSECTIONS DURING PEAK PERIODS SHALL BE:

- A. Level of service “C” on rural recreational/scenic roads.
- B. Level of service “D” on rural developed area roads.
- C. Level of service “D” on urban developed area roads.
- D. Level of service “D” for signalized intersections.
- E. Level of service “E” may be acceptable during peak periods in urban areas, not to exceed four hours per day.

F. These vehicle LOS (level of service) standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project generated traffic in relation to overall traffic conditions on affected roadways.” [http://www.trpa.org/wp-content/uploads/Regional\\_Plan\\_Goals\\_Policies\\_Final-2012-12-12.pdf](http://www.trpa.org/wp-content/uploads/Regional_Plan_Goals_Policies_Final-2012-12-12.pdf)

<sup>21</sup> “The project may not provide an adequate supply of public transit service to meet the anticipated demand. Mitigation, including the creation of a community service area (CSA) or a community facilities district (CFD) to provide additional funding for increased transit service, has been recommended to reduce this impact to a less-than-significant level.” (DEIR, p. 17-5)

the frequency, cost, and convenience of transit service will all play a role in ridership,<sup>22</sup> the project applicant should be required to improve all of these factors *in order to* increase ridership. As it now reads, it appears the mitigation does not require these improvements, and only applies if and when ridership on existing services increases. If there are no changes which incentivize increased ridership and limit personal vehicle use, the FEIR cannot assume increased ridership and cannot therefore deduct new trips from the Proposed Project’s impacts.

03-13  
cont.

*The FEIR needs to include provisions which clearly identify when ridership will be considered to have reached capacity, and therefore, when this mitigation measure would be required. In addition, the FEIR needs to analyze the existing transit service, and changes to frequency, cost, convenience, destinations, and other factors that will be necessary to increase ridership, and what monitoring activities will be included to ensure sufficient transit service in the future. Further, the FEIR needs to identify measures to disincentivize personal automobile use, and how such measures will be implemented and monitored over time.*

**B. Inadequate and uncertain mitigation for transit:**

Mitigation Measure 9-7 requires KSL to either contributes its fair share to transit service, “or” that increased transit services be covered by the creation of a Community Service Area or Community Facilities District.<sup>23</sup> This places the burden of mitigation on local taxpayers and reduces the burden to the project applicant, as both options tax property-owners.

03-14

Once approved, a Special Tax Lien is placed against each property in the CFD. Property owners then pay a Special Tax each year. (California Tax Data: What is Mello-Roos?).<sup>24</sup>

When a CSD exists, the property owner will pay taxes to the CSD instead of the county for the services provided. Taxes are calculated upon assessed value of the land and improvements and placed on the property tax bill. (California Tax Data: What is a Community Services District?)<sup>25</sup>

The mitigation also specifies that if and when a CSA or CFD is formed, the project applicant is no longer required to make fair share payments to TART.<sup>26</sup> This means that the TART system – which is operated by the Placer County Department of Public Works Programs (notably a public agency)<sup>27</sup> – may have to pick up the tab in the future for

<sup>22</sup> [http://tahoempo.org/documents/monitoring/Mobility2030-2010Mon\\_Report\\_5-31-11.pdf](http://tahoempo.org/documents/monitoring/Mobility2030-2010Mon_Report_5-31-11.pdf)

<sup>23</sup> “Mitigation Measure 9-7: 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 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.” DEIR, p. 9-66.

<sup>24</sup> <http://www.californiataxdata.com/pdf/Mello-Roos2.pdf>

<sup>25</sup> <http://www.californiataxdata.com/pdf/CSD.pdf>

<sup>26</sup> “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.” (p. 9-66).

<sup>27</sup> Tahoe City Mobility Plan, p. 13; Also, see: <http://www.placer.ca.gov/Departments/Works/Transit/TART.aspx>

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transit services that the project applicant will rely on as mitigation for the applicant’s project. This not only creates question regarding the certainty of future transit (as funding for public transit services fluctuates), but it also creates concern that a private project developer can build a project with significant environmental and community impacts, profit from doing so, and yet rely on the public to fund the project’s mitigation.

03-14  
cont.

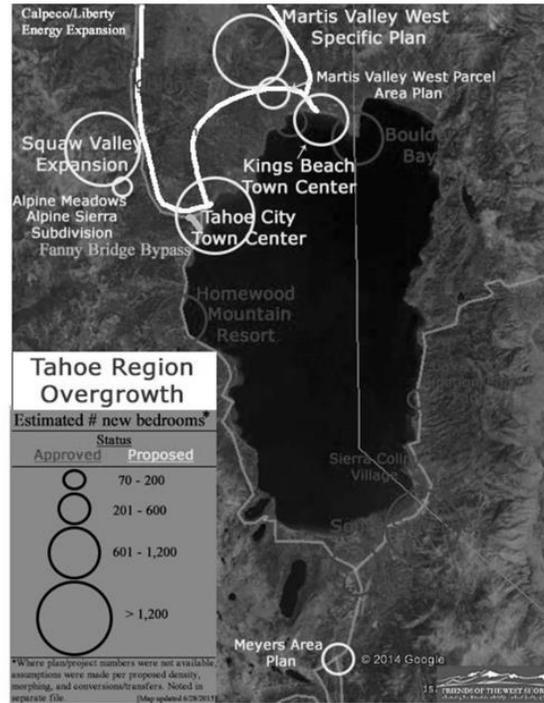
**V. Cumulative impacts to the Lake Tahoe Basin and Adjacent areas:**

In our comments on the NOP, we stated the EIR needs to evaluate the cumulative impacts associated with current and likely future projects (built, permitted, and reasonably foreseeable), especially on traffic both in and around the project area (including Lake Tahoe), air quality, water quality, noise, etc. For example, substantial increases in development and related traffic may occur from regional projects and plans with current applications, those undergoing environmental review processes, and/or those approved but not yet built. Examples are noted in the map below (FOWS, 2015).

03-15

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03-15  
cont.

- Such projects include, but are not limited to:
  - ✓ Expansion of the Homewood Mountain Resort (scheduled to begin in 2016);
  - ✓ Boulder Bay development at North Stateline (permitted);
  - ✓ Kings Beach Commercial Core Project (underway);
  - ✓ Increases in Tahoe City development and population (planned in the draft Placer County Tahoe Basin Area Plan)<sup>28</sup> and as approved by TRPA’s 2012 Regional Plan Update;
  - ✓ Expansion of Northstar Resort;
  - ✓ Proposed rezoning on ridge between Northstar and North/West Lake Tahoe (aka the proposed “Martis Valley West Area Plan”<sup>29</sup>);

<sup>28</sup> <http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>  
<sup>29</sup> <http://friendswestshore.org/martis-valley-west-parcel-area-plan-aka-tahoe-ridge/line/>

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- ✓ Increased development in Martis Valley and Truckee Area;
- ✓ Increased populations in areas within a few hours' drive; and
- ✓ Potential base-to-base gondola to Alpine Meadows.

The cumulative impacts of these projects need to also be analyzed in light of climate change, which is expected to aggravate existing issues and concerns. For example, with increased wildfire danger, impacts to traffic and emergency access are likely to become more important, and as climate change results in a reduced snowpack, and with the potential for ongoing drought, water supply concerns will increase.

Of the projects listed above, the DEIR's cumulative analysis<sup>30</sup> fails to include the Boulder Bay development, the Kings Beach Commercial Core Project, the Kings Beach and Tahoe City Town Centers and Tahoe City Lodge Pilot Project [as proposed in the draft Tahoe Basin Area Plan],<sup>31</sup> and the Martis Valley West Parcel Area Plan (notably, the application has been suspended, not withdrawn<sup>32</sup>).

*The FEIR needs to include the impacts of these additional developments in the cumulative impacts analysis.*

03-15  
cont.

<sup>30</sup> DEIR p. 18-3 to 18-5.

<sup>31</sup> <http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>

<sup>32</sup> <http://www.tahodailytribune.com/news/15304708-113/developer-residential-units-still-possible-above-north-tahoe>

Print

<https://us-mg204.mail.yahoo.com/neo/launch?.partner=abc&.rand=da2r..>

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**Subject:** RE: VMT question -- Re: Request regarding Squaw Valley DEIR  
**From:** Alexander Fisch (AFisch@placer.ca.gov)  
**To:** jqtahoe@sbcglobal.net  
**Cc:** susan@friendswestshore.org; jmtornese@aol.com;  
**Date:** Thursday, May 21, 2015 2:46 PM

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Jennifer,

If you look in Appendix H you will find the VMT information is included there, and it was derived directly from the traffic modelling.

Alex

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Alex Fisch  
 Senior Planner  
 Placer County Planning Services  
 3091 County Center Drive, Auburn 95603  
 530.745.3081  
[www.placer.ca.gov](http://www.placer.ca.gov)

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**From:** Jennifer Quastnick [mailto:jqtahoe@sbcglobal.net]  
**Sent:** Thursday, May 21, 2015 2:38 PM  
**To:** Alexander Fisch  
**Cc:** Susan Gearhart, Judi Tomese, Richard Moorehead  
**Subject:** Re: VMT question -- Re: Request regarding Squaw Valley DEIR

Thank you Alex, I appreciate the files and the response. You have quite a lot of information to deal with!

Regarding the VMT issue, there is no 'totaled' amount in Appendix G, nor in Chapter 9. All I could locate in the appendix were the modeled values for peak 15 minute and peak 60 minute VMT along selected routes, and the only route that partially addresses in-Basin impacts is the SR 28 to Alpine Meadows Drive segment (both directions), again, the outputs only list peak VMT values. There is no information regarding where the VMT totals referenced in the AQ chapter came from, nor estimates of the VMT generated by air basin/roadway.

Further, we requested in our NOP comments that the transportation and AQ impacts within the Lake Tahoe Air Basin be analyzed, and I have not located this information in the DEIR.

I hope the consultants can provide this information and/or identify where it is located?

Thanks again,  
 ~Jennifer

1 of 2

7/9/2015 4:18 PM

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<https://us-mg204.mail.yahoo.com/neo/launch?.partner=sbc&.rand=da2r..>

**From:** Alexander Fisch <[Afisch@placer.ca.gov](mailto:Afisch@placer.ca.gov)>  
**To:** Jennifer Quastnick <[jquastn@sbceglobal.net](mailto:jquastn@sbceglobal.net)>  
**Cc:** Susan Gearhart <[susan@friendstwestshore.org](mailto:susan@friendstwestshore.org)>, Judi Tomese <[jtomese@aol.com](mailto:jtomese@aol.com)>, Richard Moorehead <[R.Moorehead@placer.ca.gov](mailto:R.Moorehead@placer.ca.gov)>  
**Sent:** Thursday, May 21, 2015 1:55 PM  
**Subject:** RE: VMT question -- Re: Request regarding Squaw Valley DEIR

Hello Jennifer:

Please call me Alex. Thank you for your patience, things have been a little hectic this week as you might imagine. Attached are the survey documents you have requested. Please see below for responses to your questions. Thank you

Alex

Alex Fisch  
 Senior Planner  
 Placer County Planning Services  
 3091 County Center Drive, Auburn 95603  
 530.745.3081  
[www.placer.ca.gov](http://www.placer.ca.gov)

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**From:** Jennifer Quastnick [<mailto:jquastn@sbceglobal.net>]  
**Sent:** Wednesday, May 20, 2015 2:09 PM  
**To:** Alexander Fisch  
**Cc:** Susan Gearhart, Judi Tomese  
**Subject:** VMT question -- Re: Request regarding Squaw Valley DEIR

Hello again Mr. Fisch,

The DEIR Chapter on Air Quality states the following on page 10-15:

"Upon full buildout of the Specific Plan, which would occur no earlier than 2037, the project would generate up to 2,821 trips per day and 85,398 VMT in Placer County and/or the MCAB during the peak day of the winter season and up to 8,410 trips per day and 172,168 VMT in Placer County and/or the MCAB during the peak summer season day. (According to the analysis presented in Chapter 9, "Transportation and Circulation," another 26,912 VMT would be generated by the project on a peak summer day that would occur outside of this area but this portion of VMT would be split among areas of Nevada, El Dorado County, and counties in the Sacramento and Bay Area regions [Fehr & Peers 2014]. Thus, mobile-source emissions associated with this portion of VMT would be split among multiple other air basins.")

I did not find any assessment of VMT in the Transportation chapter. Also, there does not appear to be a report or summary of the total VMT estimates that are presented in Appendix G (which appear to be from Fehr & Peers 2014)? Can you please point me to where this information is located? I'm looking for the information supporting the total VMT numbers presented in the AQ chapter, as well as the VMT generated within the Lake Tahoe Air Basin. The Transportation Chapter analyzed project impacts based on Level of Service criteria thresholds of significance. VMT data was developed for the project and is included in Appendix G; that VMT data was utilized for the AQ and GHG modeling done for the EIR.

Thank you,  
 ~Jennifer Quastnick

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**From:** Jennifer Quastnick <[jquastn@sbceglobal.net](mailto:jquastn@sbceglobal.net)>  
**To:** "Alex" <[afisch@placer.ca.gov](mailto:afisch@placer.ca.gov)> <[afisch@placer.ca.gov](mailto:afisch@placer.ca.gov)>  
**Sent:** Wednesday, May 20, 2015 10:17 AM  
**Subject:** Request regarding Squaw Valley DEIR

Hello Mr. Fisch,

Can you please provide me copies of the surveys used to compile the tables in the Transportation Section of the SV DEIR (Tables 9-12, 9-13, 9-14, and 9-15)? I cannot locate them elsewhere, although with over 2,000 pages, I apologize if I have missed them. (If so, please provide the specific location of the surveys). Attached

Thank you,  
 ~Jennifer Quastnick

*Friends of the West Shore*

2 of 2

7/9/2015 4:18 PM

- 
- 03** Friends of the West Shore  
Susan Gearhart, President and Jennifer Quashnick, Conservation Consultant  
July 14, 2015
- 
- 03-1 The comment is an introductory statement and does not address the content, analysis, or conclusions in the DEIR. Therefore, a response is not provided here.
- The comment states that comments from the following organizations are incorporated: Sierra Watch and Friends of Squaw Valley. See responses to comment letters O8 and O2, respectively.
- 03-2 The comment provides a summary of detailed comments provided below regarding the project's significant and unavoidable impacts on SR 28 east of SR 89. See responses to comments O3-4 and O3-5.
- 03-3 The comment provides a summary of detailed comments provided below regarding the project's impacts within the Lake Tahoe Basin. See responses to comments O3-6 through O3-12.
- 03-4 The comment states that mitigation is needed for significant and unavoidable impacts to SR 28 east of SR 89. The comment suggests that additional mitigation measures such as preferential employee carpool parking and subsidized transit passes. The project includes preferential parking for carpools (four or more occupants); this measure is outlined in Chapter 5 of the VSVSP. As further described in Chapter 5 of the VSVSP, the project would include robust transit programs, from a transit center, to shuttles that serve the project and Olympic Valley, to participation in transit programs to serve the Tahoe and Truckee areas. Regarding employee subsidies, Chapter 5 of the VSVSP includes:
- Squaw Valley Resort will continue to subsidize transit fares on TART services for employees not conveniently served by the shuttles. Squaw Valley Resort will also continue to provide operational funding to TART for winter service in addition to purchasing fares for employees. Squaw Valley Resort will continue to be an active member in the Truckee/North Tahoe Transportation Management Association, as it provides a forum for solving regional transportation problems through public-private cooperation.
- Mitigation Measure 9-7 will also help fund expanded transit services, which would be expected to include services to and through Tahoe City.
- 03-5 The comment expresses concern regarding the lack of comments on the NOP by Lake Tahoe transportation agencies—the Tahoe Metropolitan Planning Organization (TMPO) and the Tahoe Transportation District (TTD)—and TRPA. TRPA (which also serves, alternatively, as the TMPO) received the NOP and did not comment. TTD did not receive a copy of the NOP. See response to comment O3-7.
- 03-6 The comment states that the DEIR failed to adequately analyze impacts of the project to the Lake Tahoe Basin, including vehicle miles of travel (VMT), air quality, and recreational impacts. The DEIR addresses the reasonably foreseeable and potentially significant adverse effects of the project in appropriate local and regional contexts, and acknowledges that some environmental impacts extend outside the immediate project area to include the Basin.

For example, Exhibit 9-1 in the DEIR shows the intersections and roadway segments within the Tahoe Basin that were studied. As shown, the study area included the critical SR 89/SR 28 intersection, as well as segments of SR 89 (north of SR 28), SR 89 (south of SR 28), and SR 28 (east of SR 89). These facilities are the regional travel routes used to access the North and West shores of Lake Tahoe from destinations to the north. See the Master Response regarding traffic for additional information and a discussion of how the project would change the total VMT in the Tahoe Basin.

Regarding alleged impacts to recreational facilities, the comment generally suggests, without identification of any specific facilities, that an impact analysis should be performed on how the project could affect the “recreational capacity and user experience” of facilities throughout the Basin. This is a vague comment because it does not identify specific parks or facilities of concern to the commenter. As described in Appendix G of the State CEQA Guidelines, CEQA is concerned with whether a project would cause physical deterioration of recreational facilities or require the construction or expansion of recreational facilities that would result in physical environmental impacts. The Lake Tahoe Basin is, obviously, a much-loved tourist destination. The Tahoe Fund, an organization dedicated to providing funding and support for the restoration and enhancement of Lake Tahoe, reports that total population at the Lake can reach 300,000 on peak days (Tahoe Fund 2015). It would be speculative to suggest that the incremental visitation from the project at Squaw Valley to Lake Tahoe, even if a high proportion of the 1,493 bedrooms at Squaw were occupied and occupants visited the lake, would translate to physical deterioration of recreational facilities around the lake given the use already experienced.

As another example, air quality impacts, as analyzed in Chapter 10, “Air Quality,” of the DEIR, include those that could occur in the Mountain Counties Air Basin, Lake Tahoe Air Basin, and in other areas. The air quality thresholds used in the analysis are based on the air basin that would be directly affected by project development and traffic, the Mountain County Air Basin, which includes the Lake Tahoe Basin. For additional discussion about the effects of the project on the Lake Tahoe Basin, see the Master Response regarding TRPA thresholds.

03-7

The comment indicates that the EIR needs to identify the project as having statewide, areawide, or regional significance. Section 15206 of the State CEQA Guidelines identifies size and location criteria that define projects as being of “statewide, regional, or areawide significance,” as well as specific guidance related to noticing and document submittals that apply to projects of this type. The project meets the size criteria that would define it as meeting the standards in Section 15206. It is noted that one of the locational criteria is that a project would be situated in the Lake Tahoe Basin. The proposed project is not located in the Basin, but meets other criteria (i.e. size), used to determine that it is a project of statewide, regional, or areawide significance. Once it is determined that a project meets this criteria, the DEIR must be submitted to the State Clearinghouse and the “transportation planning agencies and public agencies which have transportation facilities within their jurisdictions which could be affected by the project.” Transportation facilities include: major local arterials and public transit within five miles of the project site, and freeways, highways and rail transit service within 10 miles of the project site” (PRC Section 21092.4). There is no requirement to identify the project as having statewide, areawide, or regional significance within the body of the environmental document.

CEQA requires that the lead agency consult with regional transportation agencies and public agencies that have transportation facilities within their jurisdiction that could be affected by projects of statewide, regional, or areawide significance in a manner consistent with the consultation afforded to responsible agencies. The revised NOP was sent on February 21, 2014 to Caltrans (District 3), the Placer County Department of Public Works, the Truckee North Tahoe Transportation Management Association, the Nevada County Transportation

Commission, the Town of Truckee, and TRPA (which serves as the California Regional Transportation Planning Agency). Comments on the NOP were received from the Town of Truckee. These same entities were provided notice of availability of the DEIR in May 2015. Comments on the DEIR were received from Caltrans (see comment letter S2) and the Town of Truckee (see comment letter L6).

It is noted that there are additional transportation agencies in the Basin that may have facilities within their jurisdiction that could be affected by the project; specifically TMPO, which shares regional transportation planning authorities in the Lake Tahoe Region with TRPA, and TTD, which was established in 1980 when the Tahoe Regional Planning Compact was amended. Although these agencies work closely with TRPA, which was provided the notice of preparation and DEIR, separate consultation with these agencies is preferable. The County cured this oversight, in response to this comment. The DEIR was sent directly to TMPO (although it had already been provided to TRPA) and TTD (note that the NOP is required to be sent to “responsible agencies;” TTD is not a permitting agency, so including them on the NOP distribution was not required) for a 45-day review period, the review period required by CEQA. The DEIR was provided to the TMPO and TTD on October 27, 2015, and they were allowed to comment until December 11, 2015. A joint comment letter was received from the TMPO, the California Regional Transportation Planning Agency, and TRPA on December 22, 2016, and is responded to in this FEIR as Letter R1. As documented in the letter, TMPO, TRPA, and Placer County have collaborated to identify and address potential traffic impacts in the Basin (through such means as traffic impact fees and other funding).

The DEIR analysis addresses the effects of the project within the regional context that best suits each resource. For more information about assessment of impacts in the Basin, refer to the Master Response regarding TRPA thresholds.

03-8 The comment indicates that a letter submitted on the NOP requested that the DEIR evaluate the potential for visitors of the proposed project to also visit Lake Tahoe and cause VMT and air quality effects within the Lake Tahoe Basin. The comment subsequently identifies locations in the DEIR where the potential for increased travel in the Basin was disclosed. Refer to the portion of the traffic Master Response regarding added vehicle travel in the Basin for further discussion of traffic impacts related to VMT and the thresholds used to assess impacts in the traffic analysis.

Regarding the concern that the DEIR generally fails to consider potential impacts in the Basin, refer to response to comment 03-6. The DEIR addresses the effects of the project within the regional context that best suits each resource. As appropriate, effects in the Basin have been considered. For more information about assessment of impacts in the Basin, refer to the Master Response regarding TRPA thresholds.

03-9 The comment states that air quality impacts resulting from the project within the Lake Tahoe Basin need to be specifically evaluated and disclosed. See the portion of the traffic Master Response regarding VMT, which discusses the reasonably foreseeable VMT which could potentially be added by visitors of the project to the Tahoe Basin. As indicated in the Master Response, the VMT projected to be added to the Tahoe Basin by the VSVSP would not result in an exceedance of the TRPA environmental threshold carrying capacity related to VMT. TRPA’s VMT environmental threshold carrying capacity limit is intended to also limit related air quality impacts and other environmental effects (runoff) associated with on-road motor vehicle use. This relationship is shown in TRPA Resolution No. 82-11, which was adopted on December 12, 2012 and is included as Attachment 1 to the TRPA Regional Plan (TRPA 2012b). This resolution indicates that reducing VMT in the Tahoe Basin by 10 percent of the 1981 base year values is necessary to achieve TRPA’s management standard regarding nitrate deposition into the lake (TRPA 2012b:12). Moreover, the *2011 Threshold Evaluation* states that the level of VMT in the Tahoe Basin is a proxy measure of traffic congestion, the

production of nitrates, and entrainment of soil sediments from roads; and that, historically, TRPA posited that more VMT would result in increased traffic congestion, increased nitrate loading into the atmosphere (and subsequent deposition into Lake Tahoe), and an increase in the airborne concentration of particulate matter known to impact regional and sub-regional visibility and human health (TRPA 2012a:3-49). Therefore, if TRPA's environmental threshold carrying capacity for VMT is not exceeded, then on-road motor vehicle use/VMT generally will not make a substantial contribution to exceedances of these other environmental threshold carrying capacities.

Also, the project's operational emissions of ozone precursors, reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>), are analyzed under Impact 10-2 (Long-term, operation-related (regional) emissions of criteria air pollutants and precursors) in the DEIR. This analysis estimated the levels of ROG and NO<sub>x</sub> that would be emitted in the jurisdiction of the Placer County Air Pollution Control District (PCAPCD), including portions of the Lake Tahoe Air Basin, and compared them to PCAPCD's recommended thresholds of significance. As discussed in the DEIR and shown in Table 10-5 (pages 10-15 to 10-17), operation-related activities would result in project-generated daily emissions of PM<sub>10</sub> and PM<sub>2.5</sub> that are less than the PCAPCD-recommended thresholds of significance, both at partial and full buildout. Maximum daily emissions of ROG and NO<sub>x</sub>, ozone precursors, however, would exceed PCAPCD's recommended thresholds during the peak summer day of operations upon full buildout of the Specific Plan (but not at 20 percent of buildout). Mitigation Measure 10-2 requires the implementation of an ongoing ROG and NO<sub>x</sub> emissions review and reduction program, which would also result in reductions in project-related emissions in the Lake Tahoe Air Basin.

03-10

The comment expresses concern regarding the limited amount of survey data used in the study and its representativeness of anticipated travel behaviors by project residents and visitors. Data were collected by multiple surveys after initiation of the DEIR. This information provides a reasonable basis, supported by substantial evidence, upon which to assess future anticipated patterns and travel behavior. The fact that survey data were used to inform the analysis is, itself, an indication that the detail of analysis and attention to local conditions exceeds typical standards. Most transportation analyses rely on national publications and models based on travel theory. The fact that the EIR uses survey data reflects a high degree of precision in the predictive analysis because it is site specific and based on a range of visitors. The comment does not state any specific technical concerns (e.g., high standard deviation in data) nor does it contain any alternative survey data. It is noted that professional engineering guidelines (e.g., standards for identifying 85<sup>th</sup> percentile vehicle speeds used to establish vehicle speed limits, sample size for trip generation estimates) use sample sizes of 100 or fewer data points.

The surveys were conducted at the project site during the same peak time periods that were analyzed in the DEIR. The comment speculates that the results may not be accurate because the survey was conducted in 2011-2012 when the area had "suffered a significant reduction in visitation due to the Great Recession." As described in the Master Responses regarding traffic and occupancy assumptions, the "Great Recession" lasted from December 2007 through June 2009, and while recovery may have been slow, it is not within the scope of the EIR to determine if a correlation between this event and visitation was still in effect more than 2 years after it ended, or if it would have affected travel behavior. The DEIR conclusions are based on substantial evidence, including but not limited to the survey data at issue in this comment. The comment does not provide any substantial evidence regarding the inadequacy of the travel behavior surveys that were used. The County decision makers may therefore rely on the survey data as supporting the conclusions in the EIR.

- 03-11 The comment states that the DEIR did not evaluate VMT generated in the Tahoe Basin, including summer and winter guest and employee trips. Refer to the portion of the traffic Master Response regarding added vehicle traffic in the Tahoe Basin.
- 03-12 The comment states that the existing LOS for SR 28 is incorrect and also states that TRPA's requirements for LOS were not used. The traffic analysis did identify the correct LOS for SR 28, based on the methodology expressed in the DEIR, including footnote 4 to Table 9-10 (segment analyzed using the urban street facilities chapter of the Transportation Research Board's [TRB] 2010 version of the Highway Capacity Manual [HCM]). The HCM considers roadway configurations, lanes, intervening roadways, and other factors as guides to determining LOS. Originally developed over 50 years ago and updated every five to ten years, the HCM is used by transportation engineers throughout the country, and provides a well-substantiated approach to transportation analysis. The HCM is published by the TRB, an arm of the National Academies of Sciences, Engineering and Medicine, a national private, non-profit institution created in 1863 by Congressional charter (TRB 2016).

TRB is one of seven program units of the National Academies of Sciences, Engineering, and Medicine, which provides independent, objective analysis and advice to the nation and conducts other activities to solve complex problems and inform public policy decisions. The Academies also encourage education and research, recognize outstanding contributions to knowledge, and increase public understanding in matters of science, engineering, and medicine. TRB's varied activities...annually engage more than 7,000 engineers, scientists, and other transportation researchers and practitioners from the public and private sectors and academia, all of whom contribute their expertise in the public interest by participating on TRB committees, panels, and task forces. The program is supported by state transportation departments, federal agencies including the component administrations of the U.S. Department of Transportation, and other organizations and individuals interested in the development of transportation.

Table 9-10 in the DEIR shows LOS E, based on the HCM method of analysis, during the summer Friday PM peak hour on SR 28 east of SR 89. Operations are near, but not at a LOS F condition. We note that in some instances the "real life" difference between LOS E and LOS F may be a few cars, so this difference may not be noticeable in reality.

Page 9-16 of the DEIR describes how downstream lane drops, pedestrian activity, and other factors (such as those mentioned in the comment) can contribute to poorer LOS at the SR 89/SR 28 intersection during certain periods. Page 9-30 of the DEIR describes the TRPA LOS policies. The TRPA standards (see page 9-31 and 9-32) were applied at the SR 89/SR 28 intersection and segment of SR 28 east of SR 89. The *Tahoe City Mobility Plan* (LSC 2015), which was cited by the commenter and published after completion of the traffic impact analysis in the DEIR<sup>1</sup>, states the same segment operates at LOS F. The Mobility Plan concluded that the segment of SR 28 east of SR 89 operates at LOS F during summer weekdays from 10 a.m. to 4 p.m. However, the technical basis for this conclusion is not supported by data or analysis. Rather, it appears to have been derived primarily through field observations and not calculations. As stated in CEQA Guidelines Section 15151, "Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts." The response does that. Moreover, the DEIR concludes that the impact of project traffic on SR 28 east of SR 89 is significant and unavoidable. The DEIR significant thresholds use TRPA standards to analyze project impacts.

<sup>1</sup> Although the DEIR was published in May 2015, the traffic impact analysis was prepared beginning in 2012; the Mobility Plan was published in February 2015.

The comment also states “that the project is inconsistent with the TRPA Regional Plan because it will worsen LOS on a roadway segment which already operates at LOS F during peak summer periods.” This comment can be attributed to the disagreement cited above, but the impact still is significant and unavoidable in the DEIR.

03-13

The comment states that the DEIR includes inadequate mitigation to support transit. Refer to the portion of the traffic Master Response regarding transit service. With regard to the comment pertaining to dis-incentivizing private automobile use, the VSVSP does not include any features that would directly dis-incentivize private automobile use in the region. However, the project does include a transit center constructed within the Village Area and a low-emission vehicle shuttle service within the Village. The VSVSP also includes Policy CP-4 related to encouraging use of regional transit services and participation in expansion of regional transit services through financial support, such as subsidies and/or funding programs.

The comment indicates that mitigation for impacts to transit service should include monitoring and a definition of what it means for ridership to be at capacity. As described in the DEIR, pursuant to Mitigation Measure 9-7, the provisions for monitoring and determining the appropriate fair share or the steps for forming a CSA or CFD shall be determined prior to the recordation of the Initial Large Lot Final Map in consultation with, and to the satisfaction of, Tahoe Area Regional Transit (TART) and County staff.

See also response to comment 03-14.

03-14

The comment states that the DEIR includes inadequate mitigation to support transit. Refer to the portion of the traffic Master Response regarding transit service. With regard to triggers that result in new transit service and what factors will be used to determine when ridership approaches capacity, it is acknowledged that this type of detail will need to be further developed; however, the DEIR includes commitments to meet the performance metrics to be established by TART. For instance, if a percent occupancy or a number of rider threshold is established in the agreement with TART, this would become the trigger upon which additional transit would need to be provided. As stated in Mitigation Measure 9-7 (**emphasis added**):

The project applicant shall commit to providing fair share funding to TART or forming 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.**

**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.

Based on this, there is a reasonable expectation that the transit service would be expanded, based on the requirements of the effected transit provided, to the degree needed to enable the transit provider to meet project demand.

The comment suggests that establishment of a CFD or CSA will transfer the obligation for mitigation from the project to other taxpayers (presumably not a part of the project) or to TART. This is not an accurate reflection of how a CFD or CSA would operate. In either instance, the fair share cost for the mitigation would be borne only by the project and other new development, if any, that joins the CFD/CSA. If the applicant pays for its fair share of additional service, then funding would come directly from the project owner. If a CSA or CFD is formed, then a taxing or fee mechanism would be placed on people who purchase project properties or in some other way use the project (depending on how the CSA or CFD is configured) with the collected funds then allocated to TART. A CFD or CSA is a valid mechanism to ensure that the proposed project, as well as other future development in the region, can combine funding to efficiently expand public transit services.

- 03-15 Table 18-2 (pages 18-3 through 18-5) in the DEIR provides the list of probable future projects that are in the project vicinity and that are likely, in combination with the project, to result in cumulative impacts. The list includes 18 projects, most of which overlap with the 10 projects listed in the comment, but also including Truckee and the Tahoe Vision Plan. It does not include projects, such as the Meyers Area Plan and several other projects on the south and south east side of Lake Tahoe because these projects are sufficiently distant that they are not likely to combine with the project to create cumulative impacts. Also, see Table 18-1 in the DEIR for an explanation of the geographic area of cumulative analysis, and the Master Response regarding the cumulative analysis.

04



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Placer County  
Planning Services Division  
2091 County Center Drive  
Auburn, CA 95603  
[Afisch@placer.ca.gov](mailto:Afisch@placer.ca.gov)

Ascent Environmental, Inc.  
455 Capitol Mall, Suite 300  
Sacramento, CA 95814  
[Sean.Bechta@ascentenvironmental.com](mailto:Sean.Bechta@ascentenvironmental.com)

Date: July 16, 2015  
To: Mr. Alex Fisch and Mr. Sean Bechta  
From: The League to Save Lake Tahoe

**Re: Comments on Draft Environmental Impact Report (EIR) for the Village at Squaw Valley Specific Plan**

Dear Mr. Fisch and Mr. Bechta,

The League to Save Lake Tahoe (the League) is grateful for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley Specific Plan (Specific Plan). While the assessment was thorough on significant and cumulative impacts to the project area, it lacked a general analysis of cumulative impacts to the Lake Tahoe Basin. The Specific Plan lies outside of the Lake Tahoe Basin and the jurisdiction of the Tahoe Regional Planning Agency (TRPA), but will still have environmental consequences to the Basin. Because of the importance of Lake Tahoe as an Outstanding National Resource Water, as well as the unique and comprehensive environmental standards governing the Lake Tahoe Basin, it is essential that the environmental analysis look closely at all impacts to the Basin. The following comments address the concerns of the League as they relate to impacts to the Lake Tahoe Basin:

04-1

- 1. **Lack of overall assessment of traffic related cumulative impacts to the Lake Tahoe Basin**
  - a. **There must be coordination between the environmental review and the new Fanny Bridge project for a true level of service (LOS) determination and mitigation**
  - b. **There must be an assessment to the increase of vehicle miles traveled (VMT)**
  - c. **There should be details as to how air quality, greenhouse gas emissions, and water quality could be impacted with increased VMT**
  - d. **The Specific Plan project applicant should provide transit services to the Lake Tahoe Basin to mitigate traffic impacts to Lake Tahoe**

04-2

- 2. **Lack of overall assessment of visual and scenic cumulative impacts to the Lake Tahoe Basin**
- 3. **The Reduced Density Alternative should be assessed for economic feasibility and considered as a serious alternative**

04-2  
cont.

**Background**

The Specific Plan has been brought forth by Squaw Valley Real Estate, LLC. (project applicant) to Placer County for approvals to entitlements. The proposed Specific Plan is massive and will come with several significant and unavoidable environmental impacts. The Specific Plan would upgrade the existing Squaw Valley Ski Resort by adding 1,493 bedrooms associated with hotel and resort residential uses provided in up to 850 units, up to a maximum of almost 300,000 square feet of commercial uses, a Village Core, restoration of Squaw Creek, forest recreation uses, conservation preserve uses, a Mountain Adventure Camp, and a transit center with parking facilities.<sup>1</sup> The Specific Plan is located outside of the Lake Tahoe Basin, but is close enough in proximity that consequences relating to the substantial development will occur in the region. The consequences to the Lake Tahoe Basin were disregarded in the DEIR.

04-3

The League is the longest running advocacy organization for Lake Tahoe. The League is responsible for watchdogging any plans or projects that could negatively impact the environment of Lake Tahoe. Lake Tahoe is a nationally protected natural resource governed by the TRPA. The Specific Plan falls under the general jurisdiction of Placer County. However, TRPA requirements cannot be overlooked when the Specific Plan will be impacting its jurisdiction. The TRPA regulates through its Regional Plan Update (RPU) and associated Code of Ordinances (the Code). The DEIR outlines several associated impacts to its surrounding environment while ignoring the neighboring Lake Tahoe Basin. The Final Environmental Review (FEIR) must solve this problem by not only analyzing the impacts, but also providing for the appropriate mitigation measures.

04-4

**1. Lack of Overall Assessment of Traffic Related Cumulative Impacts to the Lake Tahoe Basin**

The DEIR lacks an overall assessment to potential impacts as they relate to traffic in Lake Tahoe. The Traffic and Circulation section does analyze the increase of traffic to the project area and areas entering the Specific Plan. It glosses over increase of congestion to Tahoe City (which is within Lake Tahoe) by citing that congestion is already a problem in the area. The DEIR justifies any potential concerns to Lake Tahoe by citing existing conditions. Citing existing conditions or not including potential impacts to Lake Tahoe makes this review insufficient. The following traffic related concerns must be included in the FEIR.

04-5

- a. **There Must be Coordination Between the Environmental Review and the New Fanny Bridge Project for a True Level of Service (LOS) Determination and Mitigation**

04-6

<sup>1</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Introduction p.1-1.

The DEIR does not consider the recently approved TRPA/Caltrans/Tahoe Transportation District State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge project) in its analysis of impacts to level of service (LOS) in Tahoe City. The analysis cites that the intersection of SR 89 and SR 28 in Tahoe City already has an existing LOS of D. It states that this will not change with the existing conditions plus the Specific Plan (Existing Plus Project Conditions) so no adverse effect would be generated.<sup>2</sup> The Fanny Bridge project has been approved to alleviate traffic congestion in Tahoe City and improve the LOS. There will be a roundabout instead of the stoplight and another roundabout on SR 89 closer towards the Specific Plan project area.<sup>3</sup> The traffic generated by the Specific Plan has the potential to degrade the LOS the Fanny Bridge project is aiming to improve. The Fanny Bridge project is projected to break ground in 2016 and be completed in 2018. It will be completed long before the Specific Plan begins and completes construction. There must be coordination as to how the Specific Plan will increase traffic and congestion in Tahoe City and the West Shore considering the Fanny Bridge project. If the FEIS determines there will be impacts to North Lake Tahoe and overall LOS following the Fanny Bridge project, there must mitigation measures detailed before the Specific Plan is approved.

O4-6  
cont.

**b. There Must be an Assessment of the Increase of Vehicle Miles Traveled (VMT)**

The DEIR is inadequate in explaining vehicle miles traveled (VMT) determinations and does not assess potential increase of VMT to the Lake Tahoe Basin. The VMT conclusions are confusing and not properly discussed. It states (in Section 10 Air Quality),

"Mobile-source emissions of CAPS and precursors under the proposed project would result from visitor trips, employee commute trips, and other associated trips. Table 10-5 summarizes the trip generation and VMT estimates for both the peak winter and peak summer days under both 20 percent of buildout in first year scenario and full buildout of the Specific Plan. Under full buildout...the project would generate up to 2,821 trips per day and 85,398 VMT in Placer County and/or the MCAB during the peak day of the winter season and up to 8,410 trips per day and 172,168 in Placer County and or the MCAB during the peak season summer all day [According to the analysis presented in Chapter 9, "Transportation and Circulation," another 86,912 VMT would be generated by the project on a peak summer day that would occur outside of this area but this portion of VMT would be split among the areas of Nevada, El dorado County, and counties in Sacramento and Bay Area regions (Fehr & Peers 2014). Thus mobile source emissions associated with this portion of VMT would be split among multiple other air basins.]"

O4-7

This citation is confusing because there is no mention of VMT or how it is assessed in Chapter 9 as referred to. Chapter 9 attempts to calculate different regions from where trips are generated by

<sup>2</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Traffic and Circulation. p.9-59,60 (Table 9-21).

<sup>3</sup> SR 89/Fanny Bridge Community Revitalization Project. TTD/TRPA/FHWA-CFHD. March 2015. Final EIR/EIS/EA. p.2-11.

<sup>4</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Air Quality. p.10-15 (Table 10-5).

percentage, but does not give any details to VMT analysis. The citation above also does not justify how these numbers were determined. Not only is the analysis itself confusing, Lake Tahoe again is not included. Stating that there are other portions relating to VMTs in different areas does not suffice for determining the increase to VMT in the Lake Tahoe Basin. There needs to be a clarification in the FEIS for the above discrepancy and the inclusion of a VMT assessment to the Lake Tahoe Basin.

O4-7  
cont.

**c. There Should be Details as to how Air Quality, Greenhouse Gas Emissions, and Water Quality Could be impacted with Increased VMT**

With insufficient data presented as it relates to traffic and VMT for the Lake Tahoe Basin the DEIR lacks an overall assessment to the cumulative impacts to air quality, greenhouse gas emissions, and water quality. The Specific Plan will likely increase traffic and congestion to Lake Tahoe (specifically the North Shore). To what degree is not known because these consequences were never assessed as discussed above. The Air Quality, Greenhouse Gas and Climate Change, and Water Quality chapters of the DEIR do not mention potential impacts to Lake Tahoe. Once an appropriate traffic analysis is completed for Lake Tahoe, the FEIR must also determine cumulative impacts to all of these things as they relate to vehicle use.

O4-8

**d. The Specific Plan Project Applicant Should Provide Transit Services to Lake Tahoe Basin to Mitigate Traffic Impacts to Lake Tahoe**

The project applicant should include transit services to Lake Tahoe as part of the Specific Plan. For reasons already discussed the DEIR does not properly assess traffic impacts to the Lake Tahoe Basin. The FEIR should include an analysis and mitigation measures to traffic impacts. A significant mitigation measure to traffic impacts is providing transit service from the project area to the Lake Tahoe Basin. There will be a transit center and shuttling options within the Village Area, but not for the Lake Tahoe region. The DEIR states that the *Night Rider* and *North Tahoe-Truckee Free Ski Shuttle* are options for transit to the Specific Plan. These only operate at night and weekends and holidays. They also require pickup coordination.<sup>5</sup> These two forms of transportation cannot suffice as transit options to the Specific Plan from Lake Tahoe.

O4-9

The DEIR also states as part of the proposed transportation management, "As demand dictates during the peak ski season, transit service provided by TART [Tahoe Area Regional Transportation] and other providers to the Truckee/North Tahoe region would also be provided, promoted, and/or supported."<sup>6</sup> Riders often complain about public transportation in Lake Tahoe as it is often confusing and unreliable. This "element" is insufficient to mitigate the traffic impacts to the region. The massive development will logically increase the amount of visitors and residents to the Specific Plan area. However, it is also logical to assume that this will also increase the amount of trips to neighboring Lake Tahoe. There must be different transportation alternatives to Lake Tahoe. The project applicant should provide a regular transit service from the Specific Plan to the Lake Tahoe Basin to offset increase individual vehicle use.

<sup>5</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Traffic and Circulation. p.9-24.

<sup>6</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Traffic and Circulation. p.9-36.

**2. Lack of Overall Assessment of Visual and Scenic Cumulative Impacts to the Lake Tahoe Basin**

The DEIR lacks an overall assessment of visual and scenic impacts of the Specific Plan to the Lake Tahoe Basin. While it is geographically located outside of the region the massive development project will likely be seen from Lake Tahoe. The Visual Resources chapter ignores a visual or scenic assessment from anywhere not immediately located next to the project area. The development will likely be seen during the day, but even more so at night and when surrounded by snow. TRPA has stringent scenic standards for projects within the Basin. Chapter 37 of TRPA Code require strict height requirements. The RPU and Code also protect nighttime skies through Area Plans by requiring, "...in determining the light for a project, the following should be required... Exterior lighting should be minimized to protect dark sky views, yet adequate for public safety... exterior lighting should utilize cutoff shields that extend below the lighting element to minimize light pollution and stray light."<sup>7</sup>

While the Specific Plan does not fall under the jurisdiction of TRPA these requirements should not be ignored. The FEIR must include visual impacts (particularly nighttime pollution) to Lake Tahoe as well as appropriate mitigation measures. The TRPA Code provides requirements to help achieve scenic protections to the Lake.

04-10

**3. The Reduced Density Alternative Should be Assessed for Financial Feasibility and Considered as a Serious Alternative**

The Reduced Density Alternative is listed as an environmentally superior alternative and should be assessed for financial feasibility to be considered as a serious alternative. This alternative would still have significant and unavoidable impacts, but would reduce the overall size of the project by approximately 50 percent.<sup>8</sup> The DEIR states, "...the 50 percent reduction was based on a rough conceptual estimate of the minimum amount of development reduction required to reduce traffic volumes sufficiently to have no significant traffic impacts."<sup>9</sup> Logically, this would reduce any traffic impacts to the Lake Tahoe Basin and likely any scenic impacts. However, the DEIR also states, "However this alternative would not meet several project objectives and its financial feasibility is not known."<sup>10</sup> An economic analysis should be conducted to determine if this alternative is financial feasible. This alternative would likely resolve most of the concerns of the League and dramatically decrease environmental impacts associated with the Specific Plan.

04-11

<sup>7</sup> TRPA Code of Ordinances. December 12, 2012/Amended July 23, 2014. 13.5.3.F.5.a&b. p13-8.  
<sup>8</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Alternatives. p.17.25.  
<sup>9</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Alternatives. p.17.25.  
<sup>10</sup> Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Alternatives. p.17.45.

**Recommendations**

The Lake Tahoe Basin is a delicate ecosystem that has been completely ignored through the Specific Plan environmental review process. While the project itself may lie outside of the Basin, its associated impacts cannot be ignored. The League recommends the FEIR include the following:

- **All cumulative traffic impacts to the Basin must be analyzed;**
- **There must be coordination with the Fanny Bridge project;**
- **All environmental impacts to the Basin related to traffic including air quality, greenhouse gas emissions, and water quality need to be assessed;**
- **All cumulative scenic impacts to the Basin must be analyzed;**
- **The economic feasibility of the Reduced Density Alternative should be assessed for this alternative to be seriously considered.**

04-12

Sincerely,  
Shannon Eckmeyer  
Policy Analyst  
League to Save Lake Tahoe

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**04** The League to Save Lake Tahoe  
Shannon Eckmeyer, Policy Analyst  
July 16, 2015

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- 04-1 The comment provides a summary of detailed comments provided below. See responses to the detailed comments below. Also, see the Master Response regarding TRPA thresholds.
- 04-2 The comment provides a list of the topics addressed in subsequent detailed comments. See responses to the detailed comments below.
- 04-3 The comment consists primarily of a summary of the project. The concept of addressing project effects is considered in more detail in the subsequent comments and the responses below. However, as a general response, the DEIR addresses potential project effects in the Lake Tahoe Basin in multiple areas. For example, the evaluation of traffic effects in Chapter 9, "Transportation and Circulation," includes intersections and roadway segments in the Lake Tahoe Basin. The analysis of air quality impacts in Chapter 10, "Air Quality," considers effects in the air basin that encompasses Lake Tahoe.
- 04-4 See the Master Response regarding TRPA thresholds.
- 04-5 This comment is an introductory statement regarding comments 04-6 through 04-9 that follow. See also response to comment 03-6 regarding the DEIR's evaluation of traffic impacts in the Lake Tahoe Basin.
- 04-6 The comment states that the Fanny Bridge project should have been considered in the DEIR. See the portion of the traffic Master Response that addresses the Fanny Bridge project.
- 04-7 See the portion of the traffic Master Response that addresses VMT in the Tahoe Basin for a discussion of how the project would change the total VMT in the Tahoe Basin. Also see the Master Response regarding TRPA thresholds.
- The comment states that the discussion of VMT in the DEIR's air quality analysis is confusing. The comment is referring to discussion on page 10-15 of the DEIR under Impact 10-2 (Long-term, operation-related (regional) emissions of criteria air pollutants and precursors). On page 10-15 of the DEIR, the analysis states that VMT estimates are based on the transportation analysis. To clarify, Chapter 9, "Transportation and Circulation," does not contain any discussion of VMT because an understanding of VMT is not critical to evaluating the transportation impacts analyzed in that chapter, which are based on LOS and other system operation criteria. VMT levels were estimated using the same trip generation rates used for the traffic analysis in Chapter 9, as well as visitor information of existing facilities in Squaw Valley, including the locations from which patrons travel to visit Squaw Valley. Refer to Appendix C of this FEIR for details about how VMT levels were estimated.
- 04-8 The comment states that the DEIR should include disclosure of cumulative impacts to air quality, greenhouse gas emissions, and water quality that could result from increased VMT in the Basin generated by the project. See response to comment 04-7 regarding VMT in the Basin. For the reasons described above, the DEIR analysis of transportation effects is adequate and no changes to the DEIR are necessary. As such, the DEIR analyses of air quality, greenhouse gas emissions, and water quality are similarly adequate and no changes to the DEIR are necessary. For the purpose of the cumulative analysis, the geographic scope of the analysis in the DEIR was regional and the immediate project vicinity for effects on air quality, global for effects related to greenhouse gases, and regional and local for water

quality (see Table 18-1 on page 18-2 of the DEIR). Therefore, the analysis of cumulative impacts in Chapter 18, "Other CEQA Sections," includes an analysis of cumulative impacts to air quality, greenhouse gases, and water quality within the Basin.

Also, as described in the portion of the traffic Master Response related to VMT in the Lake Tahoe Basin, the proposed project would not result in an exceedance of the TRPA Threshold Carrying Capacity for VMT, and therefore, would not result in exceedance of thresholds related to VMT. For additional discussion of potential effects of the project in the Basin, refer to the Master Response regarding TRPA thresholds.

- 04-9 The comment states that mitigation should include additional transit service. See the portion of the traffic Master Response that addresses transit service and response to comment 03-14.
- 04-10 The proposed project is located entirely within the lower elevations of the Olympic Valley and is surrounded by mountains. All project elements are only visible from within the Olympic Valley will not be visible from the Lake Tahoe Basin (see also response to comment 09-195). See also the Master Response regarding TRPA thresholds and the Master Response regarding the visual impact analysis for a discussion of skyglow effects.
- 04-11 The commenter states that a financial feasibility analysis should be prepared for the Reduced Density Alternative. A financial feasibility analysis is being prepared for the County and will be provided to the Board of Supervisors prior to project approval. See also the Master Response regarding the Reduced Density Alternative.
- 04-12 The comment provides a summary of detailed comments provided above. See responses to the detailed comments above.