

## 3.2.X TRPA Responses

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December 22, 2015

Placer County Community Development Resource Agency  
Environmental Coordination Services  
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Attn: Shirlee Herrington

[cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

**RE: Draft Environmental Impact Report for the Village at Squaw Valley Specific Plan  
(PSPA 20110385, CA State Clearing House No. 2012102023)**

To Whom It May Concern:

Please accept these comments on behalf of the Tahoe Metropolitan Planning Organization (TMPO), the California Regional Transportation Planning Agency (RTPA) and the Tahoe Regional Planning Agency (TRPA) on the above referenced Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley Specific Plan (SVSP). The proposed SVSP significantly expands the bedbase, retail and attractions at the Village at Squaw Valley. The impacts of this proposed expansion, to be phased in over time, reach and extend into the Tahoe Region, a defined governmental jurisdiction governed by the terms of an approved and federally sanctioned bi-State Compact. The Compact recognizes Lake Tahoe as one of our nation’s greatest treasures.

R1-1

The TMPO, RTPA and TRPA work hand in glove to protect and preserve the outstanding resource values at Lake Tahoe while also providing opportunities for orderly growth and development consistent with specially adopted regional environmental standards called “thresholds.” The TMPO’s core mission, consistent with the goals of the TRPA and the RTPA, is to establish a safe, efficient and integrated transportation system that reduces reliance on the private automobile, provides for alternative modes of transportation, serves the basic transportation needs of the citizens of the Tahoe Region, supports the economic base of the region in the movement of goods and people, and minimizes adverse impacts on humans and the environment. The State of California delegated to TRPA the responsibility of being the RTPA for the California-side of the Tahoe Basin. As the RTPA, TRPA is charged with developing a Regional Transportation Plan (RTP), a Regional Transportation Improvement Program (RTIP) to program California state funding, and the allocation of California state transportation funding. Under the Bi-State Tahoe Regional Planning Compact, the TRPA plans for and regulates development within the Tahoe Basin that is not only consistent with but also promotes the region’s environmental objectives. Recently, the TRPA, TMPO and RTPA adopted the 2012 RTP in order to meet these objectives

R1-2

*imagine. plan. achieve.*

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and to promote environmental redevelopment within the Tahoe Basin necessary to drive infrastructure improvements to reduce fine sediment and nutrients inflow to Lake Tahoe.

R1-2  
cont.

By proposing to increase the bedbase and attractions at the Village at Squaw Valley, the SVSP, if implemented without adequate mitigation, would significantly affect Lake Tahoe’s physical environment through increased vehicle trips into, and the amount of vehicle miles traveled within, the Tahoe Basin. The TMPO, RTPA and TRPA therefore focus these comments on the Chapter 9 of the SVSP DEIR, “Transportation and Circulation.” Chapter 9 of the SVSP DEIR contains estimates of vehicle trips (Exhibit 9-10) generated by the proposed SVSP.<sup>1</sup> From this data, TRPA computed 2,686 daily in-basin trips and a range of daily in-basin VMT of 28,800 to 48,700.<sup>2</sup> These trips and VMT add to the cumulative impacts from other projects also under consideration by Placer County such as the Martis West Specific Plan and the Brockway Campground as well as from projects previously approved (e.g. Homewood Mountain Resort).

Both vehicle trips and vehicle miles traveled are considered standards of significance for projects within the Tahoe Basin. The first standard is the region’s vehicle miles traveled (VMT) threshold. The proposed project could increase in-basin VMT by 0.5-2% by 2035, contributing to exceedance of the TRPA’s VMT threshold. As part of the Regional Plan Update in 2012, TRPA established a mitigation measure for exceedance of the VMT threshold. This mitigation measure limits in-basin development, however, it applies only within the Tahoe Basin. The second standard of significance is related to vehicle trips. Applicants for in-basin projects that would result in a significant increase in daily vehicle trips must prepare and submit to TRPA a technically adequate analysis of potential traffic and air quality impacts (TRPA Code Section 65.2.4.B). A “significant increase” is defined as more than 200 daily vehicle trips (TRPA Code Section 65.2.3.G). Based on this analysis, projects are required to mitigate all traffic and air quality impacts to a level consistent with the environmental thresholds, the Goals and Policies, the Regional Transportation Plan, and the 1992 Air Quality Plan (65.2.4.B.6). In addition, all new projects, not only those that generate more than 200 daily vehicle trips, must offset their impacts by paying an air quality mitigation fee per new daily vehicle trip end (TRPA Code Section 65.2.5.C).

R1-3

Our respective staffs have engaged in productive discussion on how to address these Lake Tahoe Region impacts (referred to herein as “in-basin” impacts). We greatly appreciate the cooperation and collaboration with Placer County and the time and attention expended to explain proposed mitigation and other mechanisms that could be applied to address the in-basin impacts. Our discussions have focused on two measures, traffic impact fees to implement

R1-4

<sup>1</sup> For the purposes of these comments, TRPA accepts at face value the information in the DEIR it used to estimate daily trips. TRPA has reviewed and has no comments on other DEIR chapters.

<sup>2</sup> The range in VMT results from different methodological approaches to estimating trip length. The difference, however, becomes irrelevant with mitigation adequate to offset new trips.

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transportation and transit capital improvement programs (CIP) and formation of zones of benefit under Placer County’s County Service Area 28 to provide ongoing transit funding.

Opportunities exist to clarify Placer County’s process and allocation of resources under these two mechanisms. First, there are opportunities to identify those CIP elements that would result in improvements in transit service needed (e.g., bus acquisition) to reduce trips in the Tahoe Basin by individual automobiles (as opposed to measures solely to improve level of service (LOS) criteria, e.g. roadway expansions). Second, opportunities exist to set up ongoing operational funding streams in amounts necessary for added transit service to offset the increase in in-basin trips generated by the SVSP. For example, new trips resulting from the SVSP could be addressed via increased transit runs on the resort triangle loop. Adding another run would accommodate approximately 500 of the new trips that are anticipated to come from Squaw Valley to Tahoe City per day (20% of the overall new trips estimated for SR 89). Providing these additional new transit runs would cost approximately \$220,000 annually. Equally important, however, is ensuring that visitors are incentivized to use the new transit so that the investment in transit capital and operations results in actual trip reduction. Potential options for incentivizing transit use could include free transit fares, an origin-based parking charge at the Village at Squaw Valley for visitors who bring their cars (which could have the added benefit of reducing the need for parking spaces), or destination-based parking charges within the Tahoe Basin.

R1-4  
cont.

Applying these or other adequate mitigation measures to offset predicted increases in trips and VMT confers many benefits across the region. Demonstrating the mitigation of new, in-basin vehicle trips by the DEIR will also assist the TMPO to achieve per capita greenhouse gas emission reduction targets mandated by California’s Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008. In accordance with this bill, the TMPO maintains and works with transportation service providers to implement a Sustainable Communities Strategy (SCS), a plan currently being updated as the 2016 Regional Transportation Plan. The SCS must show how the Region will meet mandated per capita greenhouse gas emissions reductions. The approved and validated 2012 SCS meets the current targets for the Lake Tahoe Region, a 7% per capita reduction by 2020 and a 5% per capita reduction by 2035 (as compared to the 2005 base year). More recently, new greenhouse gas emission reduction targets have been articulated by California Governor Jerry Brown in his Executive Order B-30-15. These new more stringent targets, anticipated to be adopted by the California Air Resources Board, would require reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. Total basin-wide greenhouse gas emissions are divided by the region’s resident population to form the “per capita” estimate. As population growth in the Tahoe Region is limited by policies and regulations in the Lake Tahoe Regional Plan, any growth in greenhouse gas emissions must be borne by this relatively static population. Growth in visitor trips, such as the potential impacts from SVSP, contributes to growth in per capita greenhouse gas emissions. Use of the funding mechanisms suggested in these comments on the SVSP DEIS to create a robust transit system and increase transit services allows near basin growth and in-basin impacts to be off set.

R1-5

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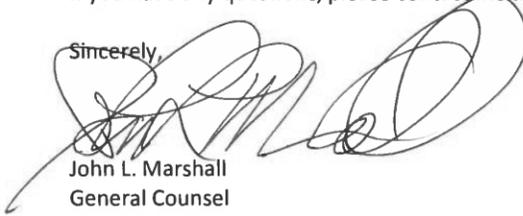
On the other hand, the absence of such transit services threatens not only the progress of greenhouse gas reduction programs, but also one of the strategies for achieving Lake Tahoe's water quality thresholds. In the 2012 Regional Plan Update, TRPA recognized the critical need to redevelop aging infrastructure with new, environmentally beneficial development. The environmental redevelopment of places like Tahoe City and Kings Beach results in substantial reductions of fine sediment and nutrient deposition, the pollutants degrading Lake Tahoe's famed clarity and blueness. The environmentally beneficial redevelopment relied upon by TRPA may be threatened by unmitigated out-of-basin increases in trips and VMT. As a result of VMT capacity used elsewhere, efforts to protect Lake Tahoe may suffer without the ability to approve in-basin redevelopment.

R1-6

Placer County's operation of the two transit funding mechanisms as discussed above provides the avenue to avoid such consequences. Through the provision of adequate transit facilities and operations, the trips and VMT generated by development in the region may be off set. We look forward to continuing the cooperative work to implement world-class transit in Placer County.

If you have any questions, please contact me at (775) 303-4882 or jmarshall@trpa.org.

Sincerely,



John L. Marshall  
General Counsel

cc: Joanne Marchetta, TRPA  
Karin Schwab, Placer County

**R1**

Tahoe Metropolitan Planning Organization, California Regional Transportation Planning Agency, and Tahoe Regional Planning Agency  
December 22, 2015

R1-1

This comment is an introductory comment from the Tahoe Metropolitan Planning Organization (TMPO), the California Regional Transportation Planning Agency (RTPA), and the Tahoe Regional Planning Agency (TRPA); and does not provide comments on the contents of the DEIR. No further response is provided.

R1-2

This comment describes the mission of these three entities, including the TMPO's core mission, the establishment of a "safe, efficient and integrated transportation system that reduces reliance on the private automobile" and related transportation goals as they relate to the basic transportation needs of the Lake Tahoe Basin. The comment also describes the transportation planning and other related programs pertaining to the Basin. No specific comments are provided on the content of the DEIR and no further response is provided.

R1-3

TMPO, TRPA, and RTPA reviewed all chapters of the DEIR and only had comments on the transportation analysis, Chapter 9. The comment suggests that, based on Chapter 9 of the DEIR, a total of 2,686 daily in-basin trips and between 28,800 and 48,700 vehicle miles traveled (VMT) would be generated by the project. Based on a more refined analysis conducted for the EIR, this is an overestimation of both in basin trips and VMT expectations. The Master Response regarding traffic addresses various traffic topics, including VMT within the Basin. The DEIR traffic consultant projected expected peak daily traffic as well as VMT from the project that would travel to the Basin, and based this on observed trip rates from the Marriot Timber timeshare/hotel on South Shore, which is a more refined approach to projecting trip and travel characteristic for the project, based on land use similarities. Based on this analysis, the Master Response estimates the summer peak traffic (on a Friday) from the project would be 3,300 trips, with 41 percent (1,353 trips) traveling into the TRPA boundary (see the Master Response for more discussion of methodology). The estimated VMT would be 23,842, which is based on actual origins/destinations of trips associated with the Squaw Valley trip ends. As further described in the Master Response, total VMT in the TRPA boundary was estimated in the Regional Plan (at Table 3.3-5) to be 1,984,600 for summer 2010 conditions. The project would result in an estimated 1.2 percent increase in VMT within the TRPA boundary. The TRPA environmental carrying capacity threshold calls for the Tahoe Region's VMT to be at least 10 percent below its 1981 level, which establishes a VMT threshold of 2,067,600. The addition of the project's VMT to the 2010 summer value would result in 2,008,442 at full build-out of the project, which would remain below this VMT threshold.

Regarding the reference in the comment to Martis Camp and the Brockway Campground projects, and their potential contribution with the project to the TRPA VMT thresholds, this analysis was not conducted for this EIR for reasons described in the Master Response regarding TRPA thresholds: While this EIR examines the environmental effects on resources outside the jurisdiction of the lead agency (Placer County), the EIR uses the thresholds of the lead agency, as is required and anticipated under CEQA analyses. As acknowledged in this comment, applicants for in-basin projects must adhere to TRPA code requirements, but this "applies only to in-basin projects" and the project is not within the Basin. Regarding the reference to vehicle trips and the need for traffic and air quality analyses for all projects in the Basin that would generate 200 or more daily trips, the same principle as the TRPA VMT threshold applies as it relates to Placer County as a lead agency. Nevertheless, the DEIR did include a comprehensive traffic analysis (Chapter 9) and air quality analysis (Chapter 10),

and both analyses considered impacts in the Basin, but using Placer County thresholds; see the Master Response regarding TRPA thresholds.

R1-4 The comment addresses a collaborative effort between the TMPO and Placer County regarding traffic impact fees and transit improvement programs, and formation of zones of benefit under County Service Area 28. The service area described in the comment includes the TART Systems Plan Update, which would serve the “resort triangle” (Incline Village/Kings Beach/North Lake Tahoe/Tahoe City on the “bottom leg” of the triangle, Alpine Meadows/Squaw Valley to Truckee on the westerly leg, and Truckee/Northstar to Kings Beach on the easterly leg) with much more comprehensive transit service, including year-round nighttime service and many other transit enhancements. Placer County and the TMPO are both considering this plan. The two County established funding mechanisms, a CSA (or equivalent funding mechanism) to provide a source of funding for ongoing operations and the Capital Improvement Program (CIP) funded by the collection of traffic impact fees, are described below.

The Master Response regarding traffic comprehensively addresses transit service expansion associated with the project, including the requirement for the applicant to pay its fair share for additional bus trips to the project site, as required by Mitigation Measure 9-7 of the DEIR (since renamed as Mitigation Measure 9-7a in this FEIR). The fair share would be based on an engineer’s report and would establish the project’s financial contribution to additional transit services. A CSA or similar funding mechanism would be established to ensure financing of the additional service and therefore would mitigate the project-specific impact to transit as identified in the DEIR. The engineer’s report would be required prior to recordation of any Small Lot Final Map to determine the extent of the fee assessment for each unit. The fee would be collected on an annual basis as a supplemental assessment to the property taxes and would fund increased operational costs of expanded transit service.

Placer County manages a Capital Improvement Program for the Tahoe Region. The CIP includes a list of future infrastructure and capital needs to serve buildout of the most current approved Community Plans for the area. The total CIP costs for this area are \$35.534 million. Included in the planned infrastructure/capital costs are transit vehicles as well as associated transit service improvements, bus shelters, and park and ride lots along all transit routes. As discussed above, the payment of the fair share would mitigate the project-specific impacts to transit and the payment of the traffic impact fee would aid in transit enhancements within the region.

In addition, the project would be required to maintain membership in the Truckee North Lake Tahoe Transportation Management Association (TNT-TMA), as per Mitigation Measure 9-7b. The mission of the TNT-TMA is dedicated to fostering public-private partnerships and resources for advocacy and promotion of innovative solutions unique to the transportation challenges of the Truckee-North Lake Tahoe Resort Triangle. The TNT-TMA serves as a discussion and advocacy forum for transit, pedestrian, biking, and roadway infrastructure designed to increase access and reduce congestion within the Resort Triangle. The TNT-TMA partners with local governments, agencies, businesses, resorts, advocacy organizations, local and federal legislators, as well as regional and state agencies to promote expansion of regional transit solutions.

By maintaining membership in the TNT-TMA, the project would provide funding to reduce vehicular congestion by advocating for enhanced transit and other forms of multimodal transportation, thus aiding in the reduction of VMT in the region.

R1-5 The comment further advocates for improved transit, including the project’s fair share funding, as part of the comprehensive program to meet GHG reduction targets. Because the

applicant would fund additional transit service, this could help the TMPO in attaining its Sustainable Community Strategy GHG reduction goal, as expressed in this comment. See also response to comment R1-4 and the portion of the traffic Master Response pertaining to transit service expansion.

R1-6

This comment re-emphasizes the need for additional transit, and for the applicant to provide fair share funding for this additional transit, so that challenging environmental improvements to the Basin are not lost to unmitigated increases in VMT. See responses to comments R1-3 and R1-4.

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