

3.2.1 Federal Responses

This page intentionally left blank.

F1



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SACRAMENTO DISTRICT
1325 J STREET
SACRAMENTO CA 95814-2922

June 12, 2015

Regulatory Division SPK-2012-00582

Placer County Community Resource Agency
Environmental Coordination Services
Attn: Ms. Maywan Krach
3091 County Center Drive, Suite 190
Auburn, California 95603

Dear Ms. Krach:

We are responding to your May 26, 2015 request for comments on the proposed Village at Squaw Valley Specific Plan project (PSPA 20110385 and State Clearinghouse 012102023). The proposed project is an approximately 85 acre mixed-use development that includes resort, residential (including employee housing), commercial, and recreation uses, as well as parking and other visitor amenities. The project is located in Section 32, Township 16 North, Range 16 East, Mount Diablo Meridian, Latitude 39.19729°, Longitude -120.23463°, Olympic Valley, Placer County, California.

The Corps of Engineers' jurisdiction within the study area is under the authority of Section 404 of the Clean Water Act for the discharge of dredged or fill material into waters of the United States. Waters of the U.S. include, but are not limited to, rivers, perennial or intermittent streams, lakes, ponds, wetlands, vernal pools, marshes, wet meadows, and seeps. Project features that result in the discharge of dredged or fill material into waters of the U.S., including wetlands, will require Department of the Army authorization prior to starting work in waters of the U.S.

Based on the proposed Exhibit 13-5, entitled *Wetland Delineation Map Showing Waters of the U.S. in the Main Village Area*, it appears there may be jurisdictional wetlands and other waters present within the proposed study area. To ascertain the extent of waters of the U.S. on the project site, the applicant should prepare a wetland delineation, in accordance with the "Minimum Standards for Acceptance of Preliminary Wetlands Delineations" and "Final Map and Drawing Standards for the South Pacific Division Regulatory Program" and submit it to this office for verification.

Additionally, as found in Section 3.1 Project Location and seen in Exhibit 3-3 of the EIR, the plan area encompasses a total of approximately 94 acres including approximately 85 acres in the main Village area on the west side of the valley and an approximately 8.8-acre area referred to as the East Parcel, located approximately 1.3 miles east of the main Village area and 0.3 mile west of the intersection of SR 89 and Squaw Valley Road. In order to meet the minimum standards for acceptance of wetland

F1-1

F1-2

delineations, the additional 8.8 acres not seen in Exhibit 13-5 should be included in the wetland delineation map in order to ascertain whether there are/are not potential wetland and/or other waters of the U.S. within the study area.

F1-2
cont.

The range of alternatives considered for this project should include alternatives that avoid impacts to wetlands and other waters of the U.S. Every effort should be made to avoid project features which require the discharge of dredged or fill material into waters of the U.S. No discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge, which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences. When considering practicability, the Guidelines define a practicable alternative as one that *is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes* [refer to 40 C.F.R. § 230.3(q)].

F1-3

Based on our regulations and policies, the Corps places high degrees of importance on the functional losses either directly or indirectly caused by the discharge of dredged or fill material into waters of the U.S., including wetlands. Therefore, to the extent practicable, the EIR should quantitatively and/or qualitatively address the anticipated direct and indirect effects to aquatic resource functions and services in terms of sedimentation (e.g., sediment transport, accretion, aggradation, degradation, erosion, hydrologic regime, water quality, floodplain encroachment, and habitat integrity). In the event it can be clearly demonstrated there are no practicable alternatives that avoid adverse impacts to aquatic resources, mitigation plans should be developed to compensate for the unavoidable losses resulting from project implementation.

F1-4

Furthermore, in our DA permit evaluation process, the Corps must balance the project purpose against the public interest. The public benefits and detriments of all factors relevant to this project will be carefully reviewed and considered. Relevant factors may include, but are not limited to, conservation, economics, aesthetics, wetlands, cultural values, fish and wildlife values, water quality, and any other factors judged to be important to the needs and welfare of the people. The following general criteria must be considered by the Corps in evaluating a DA permit application:

- The relevant extent of public and private needs;
- Where unresolved conflicts of resource use exist, the practicability of using reasonable alternative locations and methods to accomplish project purposes; and
- The extent and permanence of the beneficial and/or detrimental effects the proposed project may have on the public and private uses to which the area is suited.

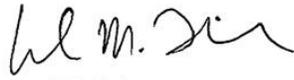
F1-5

No DA permit can be granted if the project is found to be contrary to the public interest.

-3-

Please refer to identification number SPK-2012-00582 in any correspondence concerning this project. If you have any questions, please contact me at our California North Branch Office, Regulatory Division, U.S. Army Corps of Engineers, 1325 J Street, Room 1350, Sacramento, California 95814-2922, by email at Leah.M.Fisher@usace.army.mil, or telephone at 916-557-6639. For more information regarding our program, please visit our website at www.spk.usace.army.mil/Missions/Regulatory.aspx.

Sincerely,



Leah M. Fisher
Senior Project Manager
California North Branch
Regulatory Division

F1 U.S. Army Corps of Engineers, Sacramento District, Regulatory Division
Leah M. Fisher, Senior Project Manager
June 12, 2015

F1-1 The comment states that the project applicant needs to submit a wetland delineation to U.S. Army Corps of Engineers (USACE). Mitigation Measure 6-1a on page 6-46 of the DEIR requires jurisdictional delineations for all wetlands that may be affected by the project. In part, Mitigation Measure 6-1a states:

If sensitive natural communities or habitats that are afforded specific consideration, based on Section 404 of the CWA, are determined to be within 50 feet of any groundbreaking activity within the plan area, a delineation of waters of the United States, including wetlands that would be affected by the project, shall be prepared by a qualified biologist through the formal Section 404 wetland delineation process. The delineation will be submitted to and verified by USACE. If, based on the verified delineation...it is determined that fill of waters of the United States cannot be fully avoided during implementation of the project, authorization for such fill will be secured from USACE through the Section 404 permitting process prior to the fill being undertaken.

Thus, Mitigation Measure 6-1a acknowledges the USACE's jurisdiction and ensures that the USACE's authority under Section 404 of the Clean Water Act is fully recognized. The full text of Mitigation Measure 6-1a describes the delineation and permitting process under Section 404 of the Clean Water Act, including the timing for submitting delineations (see DEIR pages 4-46 to 6-48.) The discussion is consistent with comment F1-1.

F1-2 The comment states that the project's wetland delineation must include the additional 8.8-acre East Parcel. Potential wetlands and waters of the United States on the 8.8 acres of the East Parcel are mapped in Exhibit 6-2 in the DEIR (page 6-7). See Table 6-4 in the DEIR for acres and clarification of categories listed on the map (page 6-25 to 6-27). As required by Mitigation Measure 6-1a, a formal delineation of this area would be submitted to the USACE for verification if any component of the relevant subdivision would result in groundbreaking within 50 feet of a delineated feature. Please see response to comment F1-1.

F1-3 The comment states that the DEIR should include an alternative that minimizes damage to wetlands. The EIR did include such an alternative. Alternatives to the proposed project are described and evaluated in Chapter 17, "Alternatives," of the DEIR. Specifically, the "Preservation of Historical and Wetlands Resources Alternative," which would preserve wetlands resources, was evaluated on pages 17-35 through 17-41 of the DEIR. As described therein, this alternative would preserve the wetland areas on the east side of the plan area, thus reducing the need for wetland mitigation (page 17-37). Additionally, this alternative would develop slightly less land, which would result in a lower potential to disturb plant and animal species, as well as habitat, during construction and operations when compared to the proposed project. There would also be less groundwater pumping under this alternative, resulting in less of a potential to adversely affect Squaw Creek (see DEIR page 17-37).

But, "not all wetland impacts would be avoided under this alternative because the bridges over Squaw Creek would be widened and/or reconfigured, similar to the proposed project" (see DEIR page 17-37). The alternative would also include restoration of Squaw Creek which, while an overall environmental benefit and an improvement to wetland resources, would nevertheless result in temporary significant effects to wetlands because the channel would need to be reconfigured. Therefore, the DEIR concludes that this alternative would reduce

the severity of the impact to biological resources compared to the project because this alternative would minimize the extent of some significant wetland impacts, but would not completely avoid the impact. The proposed project, moreover, with mitigation will reduce wetland impacts to less than significant levels (see Mitigation Measures 6-1a through 6-1d on pages 6-46 through 6-50 of the DEIR). Therefore, it is not necessary for the County to adopt the alternative in order to avoid or substantially lessen an otherwise significant impact to wetlands. For more discussion of the alternatives considered in the DEIR, see the Master Response regarding the Reduced Density Alternative.

F1-4 The comment states that the DEIR should include a full analysis of how wetlands may be affected, and, if they would be affected, mitigation measures should be included. As explained below, the DEIR includes this analysis and includes mitigation measures, where necessary.

The DEIR quantitatively and qualitatively addresses the project's anticipated direct and indirect effects to aquatic resource function and services in terms of sedimentation in Chapter 6, "Biological Resources," (see Impact 6-1a) and Chapter 13, "Hydrology and Water Quality." In the Chapter 6 analysis, direct construction impacts are discussed based on known locations of construction; potential impact acreage to sensitive and potentially jurisdictional habitats are quantified (see the 2nd full paragraph on page 6-41 of the DEIR). Construction-related impacts to water quality from sedimentation, contamination, and erosion are addressed on page 6-41 of the DEIR through a qualitative description. Indirect impacts to water quality through sedimentation as a result of groundwater drawdown and stormwater runoff/drainage are discussed qualitatively on pages 6-45 and 6-46 of the DEIR.

Mitigation Measure 6-1a requires that a mitigation plan be prepared (see the 1st full paragraph on page 6-45 of the DEIR):

An Improvement Plan for habitat restoration activities shall be prepared and submitted by the project applicant to the Planning Services Division for review concurrent with Improvement Plan review. A Mitigation Monitoring Implementation Program (MMIP) for the replacement of wetlands/riparian vegetation shall be prepared by a qualified wetlands biologist. Said MMIP shall be submitted to the Planning Services Division concurrent with, or prior to the Improvement Plan, and shall comply with Article 18.28 of the Placer County Environmental Review Ordinance.

The analysis in Chapter 13, particularly Impact 13-2 (pages 13-47 through 13-51) and Impact 13-3 (page 13-52), also address water quality impacts associated with creek restoration, construction within the creek channel, dewatering, and other stream flow effects. Various mitigation measures are provided to address potential discharge of materials and to stage the timing of creek restoration construction. The measures will, in part, require approval by the Lahontan RWQCB.

F1-5 The comment lists the criteria for a "DA" permit. (This refers to the Department of Army's issuance of a CWA 404 permit.) In particular, the comment notes that USACE must balance the project purpose against public interest considerations. This comment is noted. The DEIR was prepared to include information necessary to determine the potential impacts of the project on wetlands, and this information may assist USACE in its permit evaluation process. Additional specific details required by USACE will be included in the CWA 404 permit application, which is separate from the DEIR.

F2



United States Department of Agriculture

Forest Service

Tahoe National Forest Truckee Ranger District

10811 Stockrest Springs Road Truckee, CA 96161 530-587-3558 TDD: 530-587-6907 FAX: 530-587-6914

File Code: 2350; 1500 Date: July 17, 2015

Placer County Community Development Resource Agency, Environmental Coordination Services 3091 County Center Drive, Suite 190, Auburn, CA 95603

Dear Placer County Community Development Resource Agency,

The purpose of this letter is to provide official comment regarding Placer County's Draft Environmental Impact Report for the proposed Village at Squaw Valley Specific Plan (the Plan). We appreciate the opportunity to comment on the Plan at this stage. Our concerns include some specific concerns about components of the plan within the Valley, but also about how the plan considers these potential new facilities and the effects of the new development to the surrounding National Forest, its' facilities and resources.

Our concerns are related primarily to trails, proposed for use, which are National Forest System trails or are located on National Forest System land or connect to other high use National Forest trails. What has been described to us is a creative way to address the recreation demands generated by the project. As we understand it, developers will often contribute to a recreation mitigation fund, where the funds are available to the county to develop recreation facilities over time. In this case we understand that the developer proposes to use or augment existing recreational trails to meet much of the demand for recreational activities/facilities. More specifically:

- 1. Table 3-3 of the Plan references "New Trail Development," and states: "Improve existing and develop new trail connections between Alpine Meadows and Squaw Valley (extent and location of trail improvement/development not yet confirmed)." The Tahoe National Forest has concerns regarding the potential use of National Forest System lands to complete these "connections". We are also very concerned with the potential impacts to the Granite Chief Wilderness, especially to the Five Lakes Basin and to the Pacific Crest National Scenic Trail. The Five Lakes Basin is already at the upper end of acceptable use. Any potential trail that enters the Granite Chief Wilderness at or adjacent to the Fives Lakes Basin, or connects with the existing Five Lakes Trail, is likely to have significant impacts to National Forest recreational experiences as well as wilderness character. These potential impacts are not addressed anywhere within the Plan. It is possible that the increased use might cause the Forest Service to be forced to restrict use in the wilderness via a wilderness permit system for Granite Chief. That is an expense

F2-1

F2-2



Caring for the Land and Serving People

Printed on Recycled Paper



that the Forest is not currently prepared to absorb and an impact to the public that may well be a problem. We feel those effects should be addressed using established planning standards for wilderness areas and National Forest System trails.

F2-2
cont.

2. In addition to potential impacts to The Granite Chief Wilderness, the Tahoe National Forest has concerns with impacts to the Pacific Crest National Scenic Trail. Currently, the only two non-motorized earthen trails leading out of Squaw Valley are the Western States and Granite Chief Trails. These trails both intersect the Pacific Crest National Scenic Trail (PCT) which traverses the Pacific Crest above Squaw Valley. It is possible that “new trail connections” could increase use on the PCT –especially if the PCT is used as a potential North to South connection between Alpine Meadows and Squaw Valley. Increased use of the PCT may affect recreational experience as well as degrade the trail itself which is not designed for such heavy use. The potential impacts to the PCT are not addressed anywhere in the Plan.

F2-3

3. Development of trails or the increase of use in the Five Lakes Basin would also need to be assessed for effects to the recently listed Sierra Nevada Yellow Legged Frog, in the Five Lakes Basin. It is likely that consultation with US Fish and Wildlife Service would be required. We ask a commitment from the County and the developer to put safeguards in place to keep any new user created trails from being created that might impact the frog and the Basin.

F2-4

4. Table 3-3 of the Plan references “Squaw Valley Trailheads,” and states: “Provide off-street vehicle parking, bike parking, restrooms, and shaded picnic area (space permitting) at the Granite Chief and Shirley Lake Trailheads.” Currently, an unauthorized, unmaintained user created trail, referred to as the “Shirley Canyon Trail,” crosses National Forest System lands in Shirley Canyon. This user created trail has never been approved by the Forest Service nor analyzed for potential environmental impacts. We and are concerned that adding a trailhead will add use and exacerbate current problems. The Forest Service do not feel that this trail has ever been adequately analyzed for appropriate design or environmental impacts and we have concerns that developing the “Shirley Canyon Trailhead” will increase use and potential impacts to sensitive resources where it crosses National Forest System lands. These potential impacts are not addressed anywhere within the Plan.

F2-5

5. We have been surprised at the limited contact by the developer or the County during most of the planning process, as it relates to these and other trails as well as to Granite Chief Wilderness all of which are likely to be impacted by the development. On Tuesday, March 17th, 2015 a representative of the Tahoe National Forest was invited to meet with Placer County and Squaw Valley staff to discuss potential trail use, expansion, and

F2-6

design in conjunction with the Plan. At this meeting, the use of National Forest System lands and trails was discussed in the context of the development of a "Trail Plan" to be included as an appendix to the Plan. We felt agreements were made about the Trail Plan. We are now concerned that those agreements are not reflected in this draft Plan and that the "Trail Plan" is not included in the recently released draft Plan, nor are the agreements made that day reflected. At the March meeting, it was mutually agreed that:

- a. The "Trail Plan" would include the development of a lower-canyon "Shirley Canyon Loop Trail" as part of this development project. That loop trail plan would consist of improvements to the existing Granite Chief Trail, a re-routed section of the Granite Chief Trail, major improvements/ re-routes of "Shirley Canyon Trail," and a bridge spanning Squaw Creek. This "Shirley Canyon Loop Trail" would be designed and constructed to a National Forest "Trail Class 3" design parameters (design parameters attached). This "Shirley Canyon Loop Trail" is not mentioned anywhere in the Plan.
- b. It was agreed that a new trail construction into the Granite Chief Wilderness is not acceptable nor would it meet the goal of preserving or enhancing wilderness character. This is not mentioned anywhere in the Plan.
- c. During the meeting my staff shared, and both the developer and county representatives agree that new trail construction through National Forest Systems lands in Shirley Canyon requires environmental analysis as required by the National Environmental Policy Act. In addition, the Forest Service has no plan to construct a National Forest System Trail in Shirley Canyon at this time. The possibility exists for a trail to be constructed under a Special Use Authorization where the proponent bears the full fiscal responsibility for environmental analysis and construction, and monitoring and maintenance over time. The Forest Service has not received an application for a trail in Shirley Canyon at this time. This is not mentioned anywhere in the Plan.
- d. It was also agreed that any new trail constructed across National Forest System lands will have a National Forest "Trail Class 3" design or higher design standard due to the anticipated volume of use (design parameters attached). These design standards are not mentioned anywhere in the Plan.
- e. It was agreed that the Tahoe National Forest cannot be fiscally responsible for any proposed recreational trail use, expansion, and design associated with the Plan. This is not mentioned anywhere in the Plan.

We realize that a development plan of this magnitude is a complicated plan to create and to bring to completion. It is obvious that a great deal of time has been spent on the internal workings of the plan. We feel a good deal of thought is now needed to evaluate and assess the external connections with surrounding lands, systems and infrastructure to make sure that the development fits well in the environment surrounding it. Towards that end, we feel it is imperative that the secondary, off-site and regional effects need to be assessed, particularly as

F2-6

F2-7

F2-8

F2-9

F2-10

F2-11

Placer County Community Development Resource Agency

4

they relate to the surrounding National Forest System lands. I think we can all agree that we would hate to create improvements that have a negative effect on the wild lands of the National Forest, that are often a big part of why so many people will come here to recreate.

F2-11
cont.

Sincerely,



JOANNE B. ROUBIQUE
District Ranger



Design Parameters

Design Parameters are technical guidelines for the survey, design, construction, maintenance, and assessment of National Forest System trails, based on their Designed Use and Trail Class and consistent with their management intent¹. Local deviations from any Design Parameter may be established based on trail-specific conditions, topography, or other factors, provided that the deviations are consistent with the general intent of the applicable Trail Class.

Designed Use HIKER/PEDESTRIAN		Trail Class 1	Trail Class 2	Trail Class 3 ²	Trail Class 4 ²	Trail Class 5 ²
Design Tread Width	Wilderness (Single Lane)	0" – 12"	6" – 18"	12" – 24" Exception: may be 36" – 48" at steep side slopes	18" – 24" Exception: may be 36" – 48" at steep side slopes	Not applicable
	Non-Wilderness (Single Lane)	0" – 12"	6" – 18"	18" – 36"	24" – 60"	36" – 72"
	Non-Wilderness (Double Lane)	36"	36"	36" – 60"	48" – 72"	72" – 120"
	Structures (Minimum Width)	18"	18"	18"	36"	36"
Design Surface³	Type	Native, ungraded May be continuously rough	Native, limited grading May be continuously rough	Native with some onsite borrow or imported material where needed for stabilization, occasional grading Intermittently rough	Native with improved sections of borrow or imported material, routine grading Minor roughness	Likely imported material, routine grading Uniform, firm, and stable
	Protrusions	≤ 24" Likely common and continuous	≤ 6" May be common and continuous	≤ 3" May be common, not continuous	≤ 3" Uncommon, not continuous	No protrusions
	Obstacles (Maximum Height)	24"	14"	10"	8"	No obstacles
Design Grade³	Target Grade	5% – 25%	5% – 18%	3% – 12%	2% – 10%	2% – 5%
	Short Pitch Maximum	40%	35%	25%	15%	5% FSTAG: 5% – 12% ²
	Maximum Pitch Density	20% – 40% of trail	20% – 30% of trail	10% – 20% of trail	5% – 20% of trail	0% – 5% of trail

10/16/2008

Designed Use HIKER/PEDESTRIAN		Trail Class 1	Trail Class 2	Trail Class 3 ²	Trail Class 4 ²	Trail Class 5 ²
Design Cross Slope	Target Cross Slope	Natural side slope	5% – 20%	5% – 10%	3% – 7%	2% – 3% (or crowned)
	Maximum Cross Slope	Natural side slope	25%	15%	10%	3%
Design Clearing	Height	6'	6' – 7'	7' – 8'	8' – 10'	8' – 10'
	Width	≥ 24" Some vegetation may encroach into clearing area	24' – 48" Some light vegetation may encroach into clearing area	36' – 60"	48' – 72"	60' – 72"
	Shoulder Clearance	3' – 6"	6' – 12"	12' – 18"	12' – 18"	12' – 24"
Design Turn	Radius	No minimum	2' – 3'	3' – 6'	4' – 8'	6' – 8'

¹ For definitions of Design Parameter attributes (e.g., Design Tread Width and Short Pitch Maximum) see FSH 2309.18, section 05.

² Trail Classes 3, 4, and 5, in particular, have the potential to provide accessible passage. If assessing or designing trails for accessibility, refer to the Forest Service Trail Accessibility Guidelines (FSTAG) for more specific technical provisions and tolerances (FSM 2350).

³ The determination of trail-specific design grades, design surface, and other Design Parameters should be based upon soils, hydrological conditions, use levels, erosion potential, and other factors contributing to surface stability and overall sustainability of the trail.



Design Parameters

Design Parameters are technical guidelines for the survey, design, construction, maintenance, and assessment of National Forest System trails, based on their Designed Use and Trail Class and consistent with their management intent¹. Local deviations from any Design Parameter may be established based on trail-specific conditions, topography, or other factors, provided that the deviations are consistent with the general intent of the applicable Trail Class.

Designed Use		Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5
Design Tread Width	PACK AND SADDLE	Typically not designed or actively managed for equestrians, although use may be accepted	12" – 18"	18" – 24"	24"	Typically not designed or actively managed for equestrians, although use may be accepted
	Wilderness (Single Lane)		May be up to 48" along steep side slopes 48" – 60" or greater along precipices	May be up to 48" along steep side slopes 48" – 60" or greater along precipices	May be up to 48" along steep side slopes 48" – 60" or greater along precipices	
	Non-Wilderness (Single Lane)		12" – 24"	16" – 48"	24" – 96"	
	Non-Wilderness (Double Lane)		May be up to 48" along steep side slopes 48" – 60" or greater along precipices	48" – 60" or greater along precipices	48" – 60" or greater along precipices	
Design Surface²	Structures (Minimum Width)		60"	60" – 84"	84" – 120"	
	Type		Other than -bridges: 36" Bridges without handrails: 60" Bridges with handrails: 84" clear width	Other than bridges: 36" Bridges without handrails: 60" Bridges with handrails: 84" clear width	Other than bridges: 36" Bridges without handrails: 60" Bridges with handrails: 84" clear width	
	Protrusions		Native, limited grading May be frequently rough	Native with some onsite borrow or imported material where needed for stabilization, occasional grading Intermittently rough	Native, with improved sections of borrow or imported material, routine grading Minor roughness	
	Obstacles (Maximum Height)		≤ 6" May be common and continuous	≤ 3" May be common, not continuous	≤ 3" Uncommon, not continuous	

10/16/2008

Designed Use PACK AND SADDLE		Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5
Design Grade ²	Target Grade		5% – 20%	3% – 12%	2% – 10%	
	Short Pitch Maximum		30%	20%	15%	
	Maximum Pitch Density		15% – 20% of trail	5% – 15% of trail	5% – 10% of trail	
Design Cross Slope	Target Cross Slope		5% – 10%	3% – 5%	0% – 5%	
	Maximum Cross Slope		10%	8%	5%	
Design Clearing	Height		8' – 10'	10'	10' – 12'	
	Width		72' Some light vegetation may encroach into clearing area	72' – 96'	96'	
	Shoulder Clearance		6' – 12' Pack clearance: 36" x 36"	12' – 18" Pack clearance: 36" x 36"	12' – 18" Pack clearance: 36" x 36"	
Design Turn	Radius		4' – 5'	5' – 8'	6' – 10'	

¹ For definitions of Design Parameter attributes (e.g., Design Tread Width and Short Pitch Maximum) see FSH 2309.18, section 05.

² The determination of trail-specific design grades, design surface, and other Design Parameters should be based upon soils, hydrological conditions, use levels, erosion potential, and other factors contributing to surface stability and overall sustainability of the trail.



Design Parameters

Design Parameters are technical guidelines for the survey, design, construction, maintenance, and assessment of National Forest System trails, based on their Designed Use and Trail Class and consistent with their management intent¹. Local deviations from any Design Parameter may be established based on trail-specific conditions, topography, or other factors, provided that the deviations are consistent with the general intent of the applicable Trail Class.

Designed Use BICYCLE		Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5
Design Tread Width	Single Lane	6" – 12"	12" – 24"	18" – 36"	24" – 48"	36" – 60"
	Double Lane	36" – 48"	36" – 48"	36" – 48"	48" – 84"	72" – 120"
	Structures (Minimum Width)	18"	18"	36"	48"	60"
Design Surface²	Type	Native, un-graded May be continuously rough Sections of soft or unstable tread on grades < 5% may be common and continuous	Native, limited grading May be continuously rough Sections of soft or unstable tread on grades < 5% may be common	Native with some onsite borrow or imported material where needed for stabilization, occasional grading Intermittently rough Sections of soft or unstable tread on grades < 5% may be present, but not common	Native, routine grading with improved sections of borrow or imported materials Stable with minor roughness	Likely imported material, routine grading Uniform, firm, and stable
	Protrusions	≤ 24" Likely common and continuous	≤ 6" May be common and continuous	≤ 3" May be common, not continuous	≤ 3" Uncommon, not continuous	No protrusions
	Obstacles (Maximum Height)	24"	12"	10"	8"	No obstacles
Design Grade²	Target Grade	5% – 20%	5% – 12%	3% – 10%	2% – 8%	2% – 5%
	Short Pitch Maximum	30% 50% on downhill-only segments	25% 35% on downhill-only segments	15%	10%	8%
	Maximum Pitch Density	20% – 30% of trail	10% – 30% of trail	10% – 20% of trail	5% – 10% of trail	0% – 5% of trail

10/16/2008

Designed Use BICYCLE		Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5
Design Cross Slope	Target Cross Slope	5% – 10%	5% – 8%	3% – 8%	3% – 5%	2% – 3%
	Maximum Cross Slope	10%	10%	8%	5%	5%
Design Clearing	Height	6'	6' – 8'	8'	8' – 9'	8' – 9'
	Width	24" – 36" Some vegetation may encroach into clearing area	36" – 48" Some light vegetation may encroach into clearing area	60" – 72"	72" – 96"	72" – 96"
	Shoulder Clearance	0' – 12"	6" – 12"	6" – 12"	6" – 18"	12" – 18"
Design Turn	Radius	2' – 3'	3' – 6'	4' – 8'	8' – 10'	8' – 12'

¹ For definitions of Design Parameter attributes (e.g., Design Tread Width and Short Pitch Maximum) see FSH 2309.18, section 05.

² The determination of trail-specific design grades, design surface, and other Design Parameters should be based upon soils, hydrological conditions, use levels, erosion potential, and other factors contributing to surface stability and overall sustainability of the trail.

F2 U.S. Department of Agriculture, Forest Service, Tahoe National Forest, Truckee Ranger District
Joanne B. Roubique
July 17, 2015

F2-1 As discussed on pages 14-42 and 14-43 of the DEIR, the proposed project would provide a range of recreational facilities, including providing public trail connections to trails within and outside of the plan area, and public access to backcountry trails. Note that public access to backcountry trails is already available from the main Village area and is utilized by residents and guests. The proposed project includes planned improvements to trail heads in the main Village Area and improvements/repairs to some existing backcountry trails. The County will evaluate the proposed recreational facilities and improvements for compliance with County park standards. If the parkland to be dedicated and/or recreational facilities to be built do not fully meet the County standards, the proposed project will be required to pay in lieu fees, which the County would use to fund park and recreational amenities in the area.

The applicant and County staff have discussed the concerns outlined in comment letter F2 with the U.S. Forest Service (USFS). On August 21, 2015, the project applicant, Squaw Valley Real Estate, LLC (SVRE), met with Joanne Roubique and Joe Flannery; representatives of the USFS, specifically, the Tahoe National Forest Truckee District. Also, in attendance was Andy Fisher, Parks Planner for Placer County. The intent of the meeting was to review concerns as detailed in the USFS comment letter to the DEIR for the Village at Squaw Valley Specific Plan; to review and revise as necessary the Village at Squaw Valley Park and Recreation Plan, specifically, the proposed trail improvements/repairs; and to briefly discuss logistics and possible funding mechanisms for the proposed trail improvements/repairs (hereafter referred to only as "trail improvements").

F2-2 The comment expresses concern regarding a proposal to provide a new trail connection between Squaw Valley and Alpine Meadows because it would add hikers to the Five Lakes Basin (part of the Granite Chief Wilderness) and the Pacific Crest National Scenic Trail (PCT). As stated by the commenter, these areas already receive high use, and additional use could adversely affect wilderness values. The DEIR focuses on physical environmental changes and the analysis of project impacts includes trail improvements. Impacts unique to trail development are specifically identified where needed, such as Impact 6-10 (biological resources). Potential impacts to existing recreational facilities are also considered in Impact 14-6 (DEIR pages 14-42 through 14-43).

As a result of these comments and concerns, the applicant has agreed to eliminate the proposed Five Lakes Basin connection from the project, including eliminating it from the proposed Specific Plan Tails Exhibit and the Park and Recreation Plan. The elimination of this trail connection would not alter the conclusions of the DEIR, because the proposed project would still be required to meet County parks and recreation standards through an in lieu fee or by development of other parks facilities within the Specific Plan area. The revised parks and recreation trails exhibit is provided as Appendix F to this FEIR. In addition, the DEIR has been revised as described below.

Exhibit 3-15 on page 3-30 of the DEIR is revised as follows:



Note: The Illustrative Concept Plan depicts a representative site plan to show the development that could occur based on the zoning and design standards set forth in the Specific Plan. The Specific Plan provides flexibility regarding the placement and design of individual buildings. For this reason, the Illustrative Concept Plan is subject to change.
 Source: Squaw Valley Real Estate, LLC 2016; Adapted by Ascent Environmental in 2016

X11010091 04 009

Table 3-3 on page 3-31 of the DEIR is revised as follows:

Table 3-3 Proposed Parks and Recreation Improvements

Park/Facility	Proposed Improvements
Squaw Creek Linear Park and <u>New Class I Trail</u>	<ul style="list-style-type: none"> ▲ Complete trail connectivity from State Route 89 to Shirley <u>Lake Canyon Trailhead</u> ▲ Add trail improvements to connect the East Parcel to the existing Squaw Valley Trail ▲ Include interpretive signage and points of interest along the trail path
Squaw Valley Trailheads	<ul style="list-style-type: none"> ▲ Through signage, informational materials, and site rehabilitation (e.g., establish bike parking, provide shaded picnic area) better identify the Granite Chief Trailhead location and parking ▲ Provide off-street vehicle parking, bike parking, restrooms, and shaded picnic area (space permitting) at the Granite Chief and Shirley <u>Lake Canyon Trailheads</u>
<u>New Trail Development Improvements and Repairs</u>	<ul style="list-style-type: none"> ▲ Improve existing and develop new trail connections between Alpine Meadows and Squaw Valley (extent and location of trail improvement/development not yet confirmed) ▲ <u>Improve and repair existing trails in Squaw Valley, including the Granite Chief / Shirley Canyon Loop Trail, Shirley Canyon Trail, World Cup Trail connection to the Western States Trail, and Thunder Mountain Trail by compacting, removing obstacles, and otherwise improving conditions on the existing trails</u> ▲ <u>In addition, a new trail alignment between Granite Chief Trail and Shirley Canyon Trail may be identified and constructed</u>
East Parcel Trails	<ul style="list-style-type: none"> ▲ Construct a hiking trail and Class I & II bicycle path through the along Squaw Valley Road and East Parcel frontage to connect employee housing and an existing trail to the existing Class I bicycle path along Squaw Valley Road.
Squaw Valley Community Park	<ul style="list-style-type: none"> ▲ Upgrade restroom facilities to include flush toilets and sewer lift station
New Squaw Valley Seasonal Playspace	<ul style="list-style-type: none"> ▲ Tot to kinder 3-dimensional play structures ▲ Relocatable and removable during ski season ▲ Open to public use

Source: Squaw Valley Real Estate, LLC 2015

The first paragraph under Impact 6-10 (Effects of additional trail construction and improvements identified in the Specific Plan) on pages 6-74 and 6-75 of the DEIR is revised as follows:

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

animal movement corridors. For the same reasons described previously for Impacts 6-1 through 6-9, this would be a **potentially significant** impact.

Mitigation Measure 6-10 on page 6-75 of the DEIR is revised as follows:

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

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

Significance after Mitigation

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

The third paragraph under Impact 14-6 (Increased demand for parks and recreational facilities) on page 14-42 of the DEIR is revised as follows:

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

F2-3 As stated in response to comment F2-2, the applicant has agreed to eliminate the Five Lakes trail connection. This would have been the only new trail connection to the PCT. The remaining improvements to existing connections to the Granite Chief and Western States trails would be for the sole purpose of providing safer access for hikers currently using existing trails (see discussion of improvements in response to comment F2-2).

Improvements to trails and/or construction of new trail connections have been evaluated throughout the DEIR. For example, Impact 6-10 specifically addresses biological impacts associated with construction of trail improvements and the use of trails as the result of the proposed project. Mitigation is identified to ensure that impacts on trails are less than significant.

Furthermore, while not part of the project, the applicant and USFS discussed the management of events potentially associated with the Squaw Valley Resort that could result in trail use. At the August 21st meeting, the applicant agreed it would coordinate with USFS on protocols to prevent damage to trails and would repair any such damage, and would coordinate in advance of any such events. Specific actions, which would be part of a future agreement, could include posting signage, trash cleanup, trail maintenance, etc.

F2-4 See response to comment F2-2. The “Five Lakes Connection” is eliminated from the Park and Recreation Plan. Accordingly, the plan no longer includes any trail improvements or connections to or near the Five Lakes Basin. In addition, Mitigation Measure 6-10 in the DEIR requires preconstruction surveys for trails and implementation of measures (see DEIR mitigation measures for Impacts 6-1 through 6-9 for a list of potentially applicable measures) for any biological resources that could be disturbed by trail construction. Because the trail to the Five Lakes Basin would be eliminated, there is no likelihood of impacts to Sierra Nevada yellow legged frog in that area. In all areas, Mitigation Measure 6-2 from the DEIR (pages 6-53 and 6-54), which requires preconstruction surveys for Sierra Nevada yellow-legged frog and protocols to follow if the frog is present, would be implemented as applicable for any proposed trail improvements. Moreover, for any trails on federal lands, construction would also require consideration under the National Environmental Policy Act (NEPA), including associated environmental laws such as the federal Endangered Species Act (ESA). If there is a likelihood of take of any ESA-listed species, the ESA requires that any impacts are fully mitigated (a legal requirement) before a take permit that authorizes construction on/use of a trail would be issued.

F2-5 As a result of the August 21, 2015 meeting, the applicant agreed that proposed improvements to Shirley Canyon trail shall be constructed to align with a National Forest Trail Class 3 standards in an effort to improve the trail in a cohesive manner regardless of property owner; thereby also providing for a safer, more defined and less environmentally impactful trail. National Forest Trail Class 3 standards include, but are not limited to, 18”-36” tread width, target grade of 3-12 percent with allowances for short pitches, and 12”-18” shoulder clearance.

Because the USFS is required to construct trails on USFS-owned lands to federal standards, the applicant agrees that all proposed trail improvements on USFS-owned lands will be constructed to USFS trail standards for proposed improvements to the Shirley Canyon trail. As discussed in responses to comments F2-3 and F2-4, impacts of trail construction have been analyzed in the DEIR and mitigation measures have been incorporated to mitigate the impacts of trail construction. In addition, any activity on USFS lands will require NEPA review and compliance with other applicable environmental laws before receiving USFS authorization to proceed (see response F2-4 above).

F2-6 As discussed in response to comment F2-1, the project applicant and County staff met with USFS staff on August 21, 2015. As the result of that meeting, which occurred after publication of the DEIR, the applicant has made revisions to the Park and Recreation Plan and associated exhibits. During the August 21, 2015 meeting, the revisions were reviewed, additional revisions were made, and concurrence was met with the new proposed refinements to the trails exhibit and plan.

In the revised Plan, the proposed trail improvements would be (in order of priority): 1 - “Granite Chief Trail/Shirley Canyon Loop” inclusive of a new footbridge across Squaw Creek; 2 - a “World Cup trail connector to the Western States trail”; 3 - “Shirley Canyon Trail” improvements; 4 - “Connector back to Squaw Valley” whether by way of the existing Thunder Mountain trail or a new alignment; and 5 - a new “Potential Trail Alignment” from the approximate midway point on Granite Chief trail connecting to Shirley Canyon trail.

The VSVSP EIR is identified as a program EIR (see Section 1.1 of the DEIR on page 1-1) in part as recognition of the fact that specific elements of project implementation will be further developed and refined over time. Achieving better definition of proposed trail improvements, as was done during the August 21, 2015 meeting, is an expected element of project development and is accommodated and supported by the analysis in the EIR. Also see response to comment 09-59 regarding the issue of EIR as a program EIR.

F2-7 See response to comment F2-2; as discussed, the “Five Lakes Connection” has been eliminated from the plan. No new trail construction is proposed that would directly connect to the Granite Chief Wilderness.

F2-8 The DEIR has been prepared by Placer County to analyze the environmental impacts of the proposed specific plan, a policy document that does not itself approve construction of a project or associated land uses including trails. If the specific plan is adopted, project specific entitlement requests will be filed with the County for each discrete project phase, and all project phases will be subject to environmental review to determine compliance with the Final EIR and if additional CEQA review is required. Where such phases require development of trails on USFS lands located outside of the plan area, application for Special Use Authorization will be filed with the USFS. As indicated by the comment, any undertaking that requires the approval of a federal agency would be subject to NEPA. See, also, response to comment F2-4.

The DEIR identifies several federal agencies that might have jurisdiction over elements of the project, including the U.S. Army Corps of Engineers, the U.S. Environmental Protection Agency, and the U.S. Fish and Wildlife Agency. The comment is correct that the USFS should be included on this list. Therefore, the following bullet is added under “Federal” after the 3rd bullet on page 3-40 of the DEIR:

- ▲ **U.S. Forest Service: Approval of improvements to any trails or related facilities on USFS land, such as the Shirley Canyon Trail.**

With the agreement that Shirley Canyon trail improvements will align with USFS standards, if the improvements are approved, the applicant will contract with USFS to construct and maintain the portion of the Shirley Canyon Trail that is on USFS land and may contract with USFS to construct and maintain the portion of the trail that is on Squaw Valley Ski Holdings (SVSH) land. Regardless of who constructs the portion of the trail on SVSH land, it will be constructed to National Forest Trail Class 3 standards.

F2-9 See response to comment F2-5.

F2-10 The comment addresses funding for trails and does not address the adequacy of the DEIR. All proposed trail improvements as part of the Village at Squaw Valley Comprehensive Parks and Recreation Plan would be solely funded by the applicant. In addition, the applicant has committed to contract with the USFS via a trails and maintenance agreement to build and/or maintain the improvements associated with segments of trails that pass through federally owned lands. The scope of this contract would be funded in full by the applicant. On privately owned lands, the applicant would build and maintain all trail improvements at its sole expense. For those trails that run continuously through both private and federal lands, the

applicant will build to National Forest “Trail Class 3” standards to provide a consistent trail experience.

As an option, the applicant may consider contracting with the USFS for trail construction and maintenance on the privately owned sections of trails as well.

F2-11

The DEIR analyzes the potential environmental impacts associated with all trail improvements at a program level. As discussed in responses to comments F2-3 and F2-4, the DEIR identifies impacts and associated mitigation measures that would reduce impacts resulting from construction. Some of the mitigation measures are specific to trails, whereas others are related to grading in general (as an example) and associated erosion control measures (see Mitigation Measures 13-1 and 13-2). Furthermore, as stated in response to comment F2-8, all project phases will be subject to additional environmental review to determine compliance with the FEIR and if additional CEQA or NEPA review is required. Therefore, negative effects on USFS lands will be avoided or minimized.