



SQUAW VALLEY PUBLIC SERVICE DISTRICT



L4

July 17, 2015

Placer County Community Development Resource Agency
Environmental Coordination Services
attn: Maywan Krach, Community Development Technician
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Comments on Draft EIR - Village at Squaw Valley Specific Plan

Dear Maywan,

The Squaw Valley Public Service District (PSD or District) received the *Notice of Availability of a Draft EIR for Public Review* on May 18, 2015 and reviewed the *Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan* (State Clearinghouse #2012102023). Thank you for the opportunity to comment on the proposed project’s environmental impacts.

As you know, the District provides fire protection and emergency medical services (EMS), water, sewer collection, and garbage collection services for the community in Olympic Valley and along the Truckee River corridor. We also perform snow removal on public bike trails in the valley. The PSD has been requested by the project applicant to provide services to the proposed project.

Staff and consultants of the PSD have been working with the project applicant, Squaw Valley Real Estate (SVRE), since early 2011 to assess impacts from the proposed project on the District’s levels of service, its infrastructure and facilities, staffing, as well as impacts to the natural environment – most notably the valley’s aquifer relied upon by the community for its primary and only source of domestic water supply. In addition to many in-house evaluations of the proposed project’s impacts to the District’s services, the following impact analyses were completed by the PSD with professional consultant support:

- Village at Squaw Valley Water Supply Assessment – June, 2014
- Assessment of Project Impacts and Appropriate Fire Service Mitigations for the Proposed Village at Squaw Project – September, 2014

L4-1

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P. O. Box 2026
p. 1 of 11

Olympic Valley, CA 96146
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- Spatial Needs Assessment Operations Department Squaw Valley PSD – December, 2014
- Squaw Valley PSD VSVSP Water System Capacity Analysis – January, 2015
- Squaw Valley PSD VSVSP Sewer Capacity Analysis – November, 2014
- Revenue Impacts of the Village Development on SVPSD – September, 2014

L4-1
cont.

The PSD and SVRE intend to negotiate a Development Agreement to implement an orderly application and allocation of available District service capacity pursuant to Division 5 of the District’s Code (Will Serve Commitment and Contract). The provisions of the agreement will formalize the details of implementing mitigations to impacts assessed in the evaluations.

CHAPTER 3 – PROJECT DESCRIPTION

Section 3.4.3 – Public Services and Utilities – Water Supply (page 3-22)

The creation of a *new* Mutual Water Company to serve the proposed project has not been analyzed in the DEIR and is not a feasible alternative to the Squaw Valley PSD providing the project potable and irrigation water.

The option of SVRE to form a new Mutual Water Company to provide the project with water is included in the DEIR, in the following sections:

- **Impact 13-4 – Long-Term Land Cover Changes and Increased Groundwater Production Effects on Groundwater Patterns, Recharge, and Aquifer Storage in the Olympic Valley Groundwater Basin – Groundwater Pumping (page 13-55)**
- **Mitigation Measure 13-4 – Verify Performance of Groundwater Pumping System (page 13-63)**

L4-2

MM 13-4 states that it *“is written under the assumption that SVPSD would be the water provider to the proposed project; however, if a Mutual Water Company or other water provider is established that draws groundwater from the Olympic Valley aquifer, this mitigation measure would be applied to that entity.”*

Analysis of environmental impacts and risks, as well as impacts to the levels of service currently provided by the SVPSD and existing SVMWC, from the formation of third potable water purveyor were not considered in the DEIR.

Formation of a new Mutual Water Company is infeasible and is contrary to the Sustainable

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Groundwater Management Act of 2014 recently adopted by the State of California.

It is also inconsistent with Assembly Bill 115 and Senate Bill 88 recently passed by the California Legislature that authorizes the State Water Resources Control Board to mandate consolidation of water systems.

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cont.

Components of Mitigation Measure 13-4 rely on *coordinated* management of the aquifer and groundwater pumping in the sole aquifer to mitigate risks to the aquifer and Squaw Creek and maximize protection of the water supply resource.

L4-4

The formation of a new Mutual Water Company will result in disjointed and potentially uncoordinated management of groundwater pumping that jeopardizes the levels of service provided to existing customers of both the PSD and the existing SVMWC.

There are multiple entities which draw water from the aquifer and the effects of pumping by the developer will affect the correlative rights of all pumpers, which should be addressed in the DEIR. If a new Mutual Water Company is formed, the County should adopt enforceable mitigation measures requiring reduction of pumping and consumptive uses in the event of depletion of the water supply or lack of sufficiently available sources of supply.

L4-5

It puts at risk the environmental benefit expected from the proposed and needed Pumping Management Plan and will increase the probability of interference and negative impacts to surrounding wells as well as negative impacts to surface flows in Squaw Creek.

L4-6

The formation of a new Mutual Water Company increases the need, as well as the difficulty, of executing an updated version of the *Water Management Action Plan* (WMAAP) intended to identify groundwater elevation levels that trigger implementation of valley-wide water conservation measures in response to drought conditions. The need for an updated WMAAP is increased due to fragmented pumping management by five groundwater pumpers. Executing an updated WMAAP is made more difficult by the formation of a new Mutual Water Company by needing agreement in how pumping operations are managed in the aquifer by an additional participant in the WMAAP.

L4-7

If a new Mutual Water Company is formed, the District will consider formation of a local Groundwater Sustainability Agency (GSA) and preparation of a Groundwater Sustainability Plan (GSP) under the provisions of the Sustainable Groundwater Management Act of 2014 to ensure coordinated management of the aquifer and a reliable water supply for Olympic Valley.

L4-8

The District understands that SVRE desires negotiation and execution of a Development Agreement with the PSD to supply the project with potable and irrigation water (among other services) that is fair. Furthermore, the District understands that inclusion of the alternative to form a new Mutual Water Company in the DEIR provides SVRE a contingency if negotiations

L4-9

result in an Agreement considered by SVRE to be unfair.

However, the District intends to enter into negotiations in good faith with the desire to execute a Development Agreement that protects the District’s existing customers’ current levels of service as well as the natural environment without taking advantage of SVRE’s need for water supply to the proposed VSVSP.

Final project approval and certification of the FEIR and WSA by the Placer County Board of Supervisors should be contingent on the successful negotiation, execution and recordation of a Development Agreement between SVRE and the PSD.

L4-9
cont.

CHAPTER 9 – TRANSPORTATION AND CIRCULATION

Impact 9-6 – Impacts to Bicycle and Pedestrian Facilities (page 9-65):

The proposed project would not disrupt or interfere with existing or planned bicycle/pedestrian facilities, nor would it result in unsafe conditions for bicyclists or pedestrians. Further, the project would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems.

This would be a less-than-significant impact.

There is no mitigation required in the DEIR (page 9-65).

Significance Criteria (sec. 9.3.1; page 9-30) were developed in the DEIR for Impacts to Bicycle/Pedestrian Systems and are shown on page 9-32:

The proposed project would result in a significant impact if it would result in unsafe conditions for pedestrians or bicycles, including unsafe conflicts between pedestrians, vehicles, and bicycles.

Without current snow plow services on the bike trail between Hwy. 89 and the Village, conditions would not meet the standard described above during three-lane traffic control operations permitted on peak skier days. On these days, there is little to no space between snow banks and vehicles (traveling up to 45 mph) available for pedestrians or bicycles to travel

L4-10

on Squaw Valley Road.

The proposed project increases the importance of continuing the current Bike Trail Snow Removal Program. Increases in vehicle, pedestrian, and bicycle traffic, including employees residing in affordable housing units planned on the East Parcel commuting to work at the ski resort or Village along Squaw Valley Road magnify the need to continue snow removal services.

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cont.

The Bike Trail Snow Removal Program provides a critically important service to provide for the safety of pedestrians and bicyclists as well as mitigate traffic congestion on Squaw Valley Road. It may improve vehicle safety as it decreases the frequency vehicles are required to deviate from narrow drive lanes to avoid pedestrians and bicyclists.

An element proposed for implementation as part of the *Proposed Transportation Management Plan* (TMP) (sec. 9.3.2; page 9-36) is a:

Year-Round Bicycle and Pedestrian Trail Network – A comprehensive network of multiuse paths and sidewalks would be provided throughout the Village Area and maintained year-round by providing snow removal.

L4-11

This TMP element is for trails in the Village *only*. There is no equivalent standard for non-project trails on Squaw Valley Road that connect the Village to the East Parcel or Hwy 89.

This element of the proposed TMP should be extended to the County’s connected bike network between Hwy. 89 and the Village to continue to provide safe conditions for pedestrians, bicycles, and vehicles and to avoid unsafe conflicts.

Identify Impact 9-6 as Significant without new Mitigation Measure 9.6 that requires SVRE and Placer County to establish a permanent, secured, dedicated source of maintenance funding for snow removal services on the County bike trail between Hwy 89 and the Village to continue protecting pedestrian, bicycle and vehicle safety and to reduce interactions between vehicles / pedestrians and vehicle / bicyclists. Acquire Snow Storage Easements along Squaw Valley Road in support of the Bike Trail Snow Removal Program.

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Of course, there are many possible solutions to establishing permanent and dedicated funding including Transient Occupancy Tax (TOT) funds, funding agreements from SVRE, Placer County Dept. of Facilities, property tax assessments, dedicated CSA, etc.

The current Bike Trail Snow Removal Program is delivered by the Squaw Valley PSD; it has been in operation for four years and provides snow removal services for Placer County’s bike trails in Squaw Valley. The program is extremely popular and wintertime trail use is considerable. The program complies with provisions of a Placer County Encroachment Permit issued by the Department of Facilities Services.

Snow removal is performed annually as needed between Nov. 15 and April 30 on the 2.3 miles of trail from Hwy 89 to the trail’s western terminus near the Village. Maintenance services also include trail inspection and maintenance, sanding for traction control, sweeping, installation & removal of snow poles and signage, litter pick-up, equipment maintenance, and springtime fence repair and trail resurfacing (e.g., patch paving).

L4-12
cont.

Although current snow removal services are provided efficiently and economically and at a high level of service, annual funding is discretionary and not secured or dedicated to provide the service at this time. Two-thirds of the budget is grant-funded annually from County TOT funds through NLTRA and one-third is provided through voluntary contributions from the Squaw Valley Business Association and local businesses. Funding has been variable from local businesses and are potentially unreliable sources of funding.

A plowed bike trail also serves a separate emergency access for the Squaw Valley Fire Dept.

I L4-13

Funding should also be provided for snow removal services to open the parking area at the Squaw Valley Park to serve as an eastern trailhead / staging area for public bike trail use. A provision of the Development Agreement could include a Shared Use provision to make the Park’s parking area available to Squaw Valley Ski Resort as overflow parking on peak skier days.

L4-14

The provisions of the Development Agreement should define standards for snow removal services (e.g., every accumulation over 2” daily (open & clear by 7:00 am; 7 days / week between Nov. 15 and May 30).

L4-15

CHAPTER 13 – HYDROLOGY AND WATER QUALITY

Section 13.2.2 – Sustainable Groundwater Management Act of 2014 (pages 13-36 and 13-37).

This section incorrectly interprets the Sustainable Groundwater Management Act (SGMA). The last paragraph of this section states, “While the County and/or the SVPSD will still need to take steps to designate and form a groundwater sustainability agency for the Olympic Valley Groundwater Basin ...” The legislation does not require a Groundwater Sustainability Agency be formed in low or very-low priority basins such as Olympic Valley. The sole purpose of establishing a Groundwater Sustainability Agency is to develop and implement a Groundwater Sustainability Plan. Because Olympic Valley has no requirement to develop a groundwater sustainability plan, by inference there is no requirement to establish groundwater sustainability agency.

L4-16

This section should be modified to remove any inference that a groundwater sustainability agency *must* be formed for Olympic Valley, or that a groundwater sustainability plan *must* be

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P. O. Box 2026
p. 6 of 11

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developed for Olympic Valley.

L4-16
cont.

Impact 13-4 – Long-Term Land Cover Changes and Increased Groundwater Production Effects on Groundwater Patterns, Recharge, and Aquifer Storage in the Olympic Valley Groundwater Basin (page 13-63, first paragraph):

The first paragraph on page 13-63 establishes the basis for potentially significant impacts from groundwater pumping. There is a potentially significant impact because the groundwater model simulated, "...a particular wellfield configuration with certain operating parameters." This does not capture all the opportunities for potentially significant impacts. Additional uncertainties may result in a potentially significant impact. For example, new wells may not perform as anticipated, or the aquifer may not turn out to be as thick as assumed at new well locations. Therefore, any deviation from the assumptions in the groundwater model, whether for the simulated wellfield or for a new wellfield, may have a potentially significant impact.

L4-17

Dense development of the land overlying the aquifer poses unique risks to the District’s ability to access the aquifer to rehabilitate and replace existing and proposed production wells. It may also significantly reduce access to the aquifer to explore for additional water supply to meet future demands. The project should include a plan and dedicated areas (drilling islands) to allow for replacement and rehabilitation of wells, along with areas dedicated to access the aquifer to develop future water supplies.

Mitigation Measure 13-4 – Verify Performance of Groundwater Pumping System (pages 13-63 to 13-65)

The applicant should be required to allocate an adequate portion of future Transfer Fees to fund the District’s ongoing Aquifer Monitoring Program, as well as proposed improvements, to ensure protection of water supply resources. This includes monitoring and reporting of measured groundwater elevations and pumping data from all aquifer wells for snowmaking and irrigation as part of Pumping Management Plan. It also includes acquisition, installation, maintenance and replacement of monitoring and reporting equipment such as meters, groundwater level sensors and a SCADA system.

L4-18

The first sentence of the mitigation measure states that the purpose of the measure is to ensure, "...water supply provided to the proposed project is managed in a manner that is consistent with the system analyzed in the WSA." The mitigation measure should focus on impacts, not management. The appropriate purpose is to ensure that the water supply provided to the proposed project results in impacts consistent with the impacts predicted by the WSA.

L4-19

Consistent with our comment on impact 13-4, this mitigation measure should not solely focus on changes to the scenario simulated in the WSA, but should focus on any observed deviations from the impacts from the proposed water supply system. If unanticipated impacts are

L4-20

observed at any point during development of the water system, the project proponent must implement mitigation measures. This is true for the scenario simulated in the WSA as well as any optional scenario.

The mitigation measure relies too heavily on modeling results, and not on performance criteria. Modeling represents a best estimate of future conditions, but unknowns will always result in variations from modeled conditions. The mitigation measure must address actions that the project proponent will undertake if groundwater impacts are greater than those estimated by the groundwater model. Furthermore, the duty to implement mitigation must be a duty assigned to the project proponent. Responsibility for mitigation for a significant impact cannot be borne by a third party, such as the Squaw Valley Public Service District.

L4-20
cont.

There are no mitigations if there are environmental impacts. Identified mitigations are for failure in the wellfield design / pumping management plan; not for real impacts such as impacts on other wells or on the creek.

Mitigation Measure 13-4 should include something similar to the following:

If observed impacts to groundwater storage, creek flows, or biological or riparian habitats are greater than estimated by the WSA, the project proponent will immediately reduce impacts by either:

1. *Reducing water demand*
2. *Paying for imported water*
3. *Identifying a new water source*

L4-21

The project proponent will continue to implement these mitigations until a permanent solution can be found that reduces impacts to less than significant levels.

The need to prepare a Pumping Management Plan is driven by the increase in the number of wells required to serve the proposed project and to minimize impacts to surface flows in Squaw Creek. The District will negotiate with SVRE for funding to prepare the Pumping Management Plan. However, the County, as Lead Agency, should require the preparation of a Pumping Management Plan by the PSD and funded by SVRE to protect the local water supply resource.

L4-22

Similarly, SVRE should be required to participate and fund an update to the *Water Management Action Plan (WMAP)* intended to identify groundwater elevation levels that trigger implementation of valley-wide water conservation measures in response to drought conditions.

L4-23

Measure 13-4.A states that if the “applicant proposes an individual well and/or all or a portion

L4-24

of a well-field to meet water demand associated with the project that would differ from the well field analyzed in the WSA, the new well(s) shall not be installed until the applicant provides additional modeling demonstrating that the following thresholds, or their functional equivalent, would be met. SVPSD shall be consulted during preparation of the analysis.” This should be rewritten to show that the PSD shall perform the analysis and the applicant shall fund model updates. This will be negotiated as part of the Development Agreement between SVRE and the PSD.

L4-24 cont.

All new and replacement wells must comply with SB 221 (Water Supply Verification). Standards for the acceptance of new or replacement wells shall be subject of and required within the Development Agreement. Acceptance of new or replacement wells must be required before issuance of any permit for future stages of construction.

L4-25

Mitigation Measure 13-5 – Implement Mitigation Measure 13-4 (Verify Performance of Groundwater Pumping System) (page 13-75)

The Mitigation Measure states that the “*The applicant and SVPSD are responsible for implementation of Mitigation Measure 13-4.*” The SVPSD should not be responsible for mitigation of impacts caused by the proposed project. Any participation by the SVPSD should be funded by the applicant and the SVPSD should not have any risk exposure associated with any failure to implement Mitigation Measure 13-4.

L4-26

Mitigation Measure 13-5 states that the Mitigation Measure 13-4, “...directs the construction and operation of a well system that is consistent with the parameters of the WSA and applicable groundwater plans.” The construction and operation of the well system should be consistent with the impacts predicted by the WSA, not the parameters of the WSA.

L4-27

Small Items

Page 13-11, Section 13.1.3, second paragraph, first sentence. SVPSD uses a numerical model to simulate groundwater conditions in the OVGB *OVGMP area*.

L4-28

Page 13-11, Section 13.1.3, second paragraph. The statement that the model does not capture the lowest observations appears to be is at odds with the previous statement that the model is biased towards underestimating water levels.

L4-29

Page 13-11, Section 13.1.3, second paragraph. The statement that the model does not capture the lowest observations does not apply to SVPSD production wells – which are the focus of the analysis.

L4-30

CHAPTER 14 – PUBLIC SERVICES AND UTILITIES

The increase in demand on the District’s water and sewer systems may necessitate the need for additional staffing, equipment, vehicles, and public service facilities.

Improvements to the District’s existing systems as well as new infrastructure necessary to provide additional capacity are expected to be delivered prior to construction of the project phase necessitating them. This approach is in lieu of constructing improvements after the demand of a specific phase triggers the improvements so the District and the community are protected from risks associated with changes in the project’s ownership, scope or schedule. It is anticipated that the Development Agreement between Squaw Valley Real Estate (SVRE) and the District will help define the scope and schedule of improvements.

L4-31

Water supply sources proposed to serve the project may require treatment to meet water quality standards required by the USEPA and DPH. A new Water Treatment Plant (WTP) should be included in the scope of the project with consideration given to land acquisition, permitting, and zoning necessary to construct it.

Section 14.1.2: Wastewater (pages 14-7 and 14-8)

The flow values presented in the first paragraph for ADWF and PWWF are from MacKay & Somps 2012 Draft Master Sewer Study and are inaccurate. MacKay & Somps 2012 Draft Master Sewer Study references the PSD’s Draft 2007 Sewer Study for these values. This section should show the results from the District-prepared VSVSP Sewer Capacity Analysis.

L4-32

MacKay & Somps updated their Master Sewer Study a number of times. The most recent Sewer Study Update of March 21, 2014 is not referenced in the DEIR.

L4-33

Mitigation Measure 14-2a: Provide Sufficient On-Site Wastewater Storage (pages 14-36 and 14-37)

This Mitigation Measure should be removed as an alternative to mitigate a lack of capacity in the wastewater conveyance systems operated by the PSD and T-TSA required to serve the project. The applicant should be required to replace under-sized pipes with those with sufficient capacity to accommodate sewage flows estimated at buildout of the County’s 1983 Squaw Valley General Plan and Land Use Ordinance.

L4-34

Construction of and reliance on on-site wastewater detention facilities avoids installing basic utility infrastructure required to serve the project’s demands. It jeopardizes the community’s sole source aquifer and water supply resources by potential contamination. It is highly probable that proposed wastewater detention facilities will discharge to the natural environment at some point in the future due to an operational, equipment or facility failure. The location of wastewater detention facilities in the proximity of the community’s sole source

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P. O. Box 2026
p. 10 of 11

Olympic Valley, CA 96146
(530) 583-4692

aquifer conflicts with recommendations and requirements of the District’s Watershed Sanitary Survey required by California DPH.

The District is highly concerned with the storage of domestic wastewater. On-site detention facilities storing effluent discharged from the proposed Mountain Adventure Camp’s aquatic recreation facilities poses less risk of contaminating the water supply due to the constituents of the wastewater.

This infeasible proposal to mitigate basic impacts of increased wastewater generation from the project is repeated in Chapter 18 (Other CEQA Sections) on page 18-46 and should be modified.

Thanks again for the opportunity to provide comment on the DEIR for the project. If you have any questions or require additional information, please contact me at (530) 583-4692.

L4-34
cont.
L4-35

Sincerely,



Mike Geary, PE
General Manager

- cc: Squaw Valley Public Service District Board of Directors
- Pete Bansen, Fire Chief; Squaw Valley Fire Department
- Jesse McGraw, Operations Manager; Squaw Valley PSD
- Chevis Hosea, Vice-President of Development; Squaw Valley Real Estate

L4 Squaw Valley Public Service District
Mike Geary, PE, General Manager
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L4-1 The comment is an introductory statement and does not address the content, analysis, or conclusions in the DEIR. Therefore, a response is neither required nor provided here.

L4-2 As stated on page 3-22 of the DEIR, potable and irrigation water would be provided either by the Squaw Valley Public Service District (SVPSD) or a mutual water company that would be established as part of the Village at Squaw Valley Specific Plan (VSVSP). The Water Supply Assessment (WSA) demonstrates that there is an adequate supply of water within the Olympic Valley to provide water to existing, cumulative, and VSVSP development. The WSA assumes a particular well-field and pumping scenario in order to evaluate the adequacy of supply, including replacement of existing SVPSD wells. The WSA also recognizes that the ultimate well-field and pumping regimen could differ from the scenario analyzed in the WSA. Mitigation Measure 13-4 in the DEIR requires that any well or well-field configuration that differs from the WSA be shown to be able to meet the threshold identified in the DEIR to ensure that water supply would be adequate without adversely affecting existing wells, that impacts on the refugia pools would not be substantially worse than identified in the DEIR, and that the criteria identified in applicable groundwater plans would be met (see page 13-64 of the DEIR). If a mutual water company were created, it would likely use a different well configuration, and would therefore be subject to the requirements of Mitigation Measure 13-4, as well as additional State law pertaining to the formation of a water company. As indicated in the DEIR on page 13-63, it is anticipated at this time that the SVPSD would supply water to the proposed project. No water company has been created, so it would be speculative to describe a well-field that might be used if a new water company served the proposed project. Nonetheless, Mitigation Measure 13-4 would ensure that water supply would be adequate to serve the proposed project, and would not result in substantially more severe environmental effects, whether the water is provided by the SVPSD or a new water company.

The Draft Mitigation Monitoring and Reporting Program prepared for the project states that Mitigation Measure 13-4 will be carried out by “[t]he SVPSD (or other water provider), Placer County Planning Services Division, and Placer County Environmental Health Services.” Thus, implementation of this measure will be performed under the supervision of the County and the water provider, regardless of whether that provider is SVPSD (as proposed) or a new water company.

For CEQA purposes, the identity of the water provider is secondary. The focus of the analysis is on the impacts of the project on the physical environment. Thus, the entity providing water is relevant only insofar as it may affect the project’s environmental impacts (*Maintain Our Desert Environment v. Town of Apple Valley* (2004) 120 Cal.App.4th 396). In this case, Mitigation Measure 13-4 will apply regardless of the identity of water provider.

SVPSD’s preference to serve as the water provider is noted. The County agrees that SVPSD would be an appropriate water provider, given its longstanding status as the primary water provider in the valley, and its expertise with respect to managing the aquifer. A new water company is noted as a potential water provider in the event the applicant and SVPSD are unable to reach agreement regarding the terms of providing water.

L4-3 The comment does not indicate why formation of a mutual water company would be infeasible. State law allows for the formation of mutual water companies to provide domestic

water, subject to various requirements. The Sustainable Groundwater Management Act of 2014 does not preclude formation of new mutual water companies. The Sustainable Groundwater Management Act, as amended in the 2015 Legislative Session by Senate Bill (SB) 13, allows a private mutual water company to join a Groundwater Sustainability Agency (through a memorandum of agreement or other legal agreement) and thereby participate in development of a Groundwater Sustainability Plan.

Assembly Bill (AB) 115 is listed as inactive by the California legislature, and so has not been enacted. SB 88 (Chapter 27, Statutes of 2015) was signed by the Governor, but does not require consolidation of water agencies; rather, it allows the State Water Board to require systems that consistently fail to meet standards to consolidate with, or obtain service from, a public water system. A new water company could be subject to consolidation under SB 88 if the company could not provide adequate water that meets applicable standards to its customers. Whether a new water company would prove unable to provide adequate water is speculative.

- L4-4 The creation of a new water company would not jeopardize the levels of service for existing customers because Mitigation Measure 13-4 in the DEIR requires that a new water company meet specific criteria, such as minimum saturation rates and compliance with standards identified in groundwater plans, which would ensure that water supply would be adequate for both existing and future users, regardless of provider. Coordination with other water purveyors within the Olympic Valley would likely be needed to comply with Mitigation Measure 13-4. Currently, four public and private entities pump groundwater from the Olympic Valley aquifer, including the SVPSD, the Squaw Valley Mutual Water Company, the Resort at Squaw Creek, and Squaw Valley Resort. Adding a fifth water supply entity would not in and of itself result in disjointed or uncoordinated management. The County agrees that adding a fifth water supply entity could complicate efforts to coordinate groundwater management efforts. The County agrees that SVPSD would be an appropriate water provider. A new water company is noted as a potential water provider in the event the applicant and SVPSD are unable to reach agreement regarding the terms of providing water.
- L4-5 As discussed in response to comment L4-2, a new water company would need to use a well-field scenario that differs from the scenario analyzed in the WSA, and would therefore need to demonstrate that the well field configuration to be used would meet the thresholds used in the WSA, pursuant to Mitigation Measure 13-4 in the DEIR. This analysis would need to show that the new company could provide adequate supply to the VSVSP from its well field (including that it had the rights to that water), while ensuring that the saturation threshold identified in the WSA would be met for normal, dry, and multiple dry years for existing and future users, regardless of the provider.
- L4-6 Compliance with Mitigation Measures 13-4 and 6-1c in the DEIR would ensure that groundwater withdrawals by a new water company would not result in substantially more severe effects on Squaw Creek for the reasons discussed in responses to comments L4-2, L4-4, L4-5, and 08b-15. For a discussion of impacts on the creek, see the Master Response regarding water supply.
- L4-7 See response to comment L4-4. Regarding the Water Management Action Plan, the SVPSD is currently working on an update, and Squaw Valley has committed financial resources to the update.
- L4-8 The comment that if a new mutual water company is formed, the SVPSD will consider formation of a local Groundwater Sustainability Agency and preparation of a Groundwater Sustainability Plan is noted. This comment does not address the environmental impacts of the project, so no further response is provided.

- L4-9 The comment that the SVPSD plans to enter into a development agreement with the project applicant is noted. The County understands that discussions between the SVPSD and the applicant regarding the terms of such an agreement are underway.
- Mitigation Measure 13-4 (part B) in the DEIR specifies the elements that must be included in a development agreement between the project applicant and the water provider, including identification of the roles and responsibilities for the testing, construction, verification, and operational readiness and monitoring of new wells, the provisions of Mitigation Measure 13-4 (part A), and the process and funding responsibility for updating existing or future groundwater plans. If the SVPSD is the water provider, then the development agreement would be between the SVPSD and the project applicant. If a mutual water company is created, the agreement would instead be between the applicant and the new mutual water company.
- The agreement with the water provider, whether the SVPSD or a mutual water company, is not required before certification of the EIR and approval of the Specific Plan because water would not need to be provided to the project until the initial development occurs. In fact, a public agency's approval of a final agreement to provide water to the project would likely have to occur after the County certifies the Final EIR. (See *Riverwatch v. Olivehain Municipal Water Dist.* (2009) 170 Cal.App.4th 1186.)
- Mitigation Measure 13-4 in the DEIR requires that the project applicant provide a will serve letter from the water purveyor prior to approval of an Improvement Plan. The development agreement between the water provider and the project applicant would, therefore, need to precede Improvement Plans. This timing is appropriate, since it ensures that an agreement will be in place before the project generates any new water demand.
- L4-10 The comment discusses the Bike Trail Snow Removal Program operated by the Squaw Valley Public Service District. According to its website (<http://www.svpsd.org/bike-trail-snow-removal>), this program was operated from November 15th and April 30th during the 2014/15 winter. It removed snow on the 2.3 miles of bike trail along Squaw Valley Road on an as needed basis. The program also included trail inspection and maintenance, sanding for traction control, sweeping, installation and removal of snow poles and signage, litter pick-up, equipment maintenance, and springtime fence repair and trail resurfacing. The comment acknowledges the importance of continuing to operate this program, particularly with respect to more frequent three-lane coning associated with Mitigation Measure 9-1a in the DEIR. This comment does not raise any technical issues regarding the DEIR analysis. Therefore, no additional response is provided.
- L4-11 The comment recommends that the Year-Round Bicycle and Pedestrian Trail Network proposed in the Transportation Management Plan (TMP) be extended beyond the Village area easterly to include other bicycle and pedestrian facilities along Squaw Valley Road to SR 89. The comment provides an opinion regarding the extent to which the proposed active transportation system should extend beyond the project limits. It does not address the content, analysis, or conclusions in the DEIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project.
- L4-12 The comment suggests that a new Mitigation Measure 9-6 be recommended to provide a permanent, secured form of funding to continue the Bike Trail Snow Removal Program, which currently relies on a combination of discretionary funding sources. This pilot program is presently a three-party effort by the North Lake Tahoe Resort Association (NLTRA), Placer County, and SVPSD; with funding provided by the County and NLTRA via transient occupancy taxes. There is not a direct correlation between this temporary program and an impact of the project.

Impact 9-6 addresses impacts on bicycle and pedestrian facilities, and found that the proposed project would not disrupt or interfere with existing or planned bicycle/pedestrian facilities, nor would it result in unsafe conditions for bicyclists or pedestrians (see page 9-65). The proposed project would provide bike paths throughout the Village and connect to the path along Squaw Valley Road. Crosswalks would be provided in appropriate places. The proposed project would not interfere with the snow removal program referred to in the comment, nor would it negatively affect funding for snow removal along the trail. For these reasons, the impact on bicycle and pedestrian facilities would not be a significant effects requiring mitigation. Nonetheless, the Placer County Planning Commission and Board of Supervisors will take the commenter's request regarding a more secured funding source for snow removal on bike trails into consideration when making decisions regarding the project.

L4-13 The comment states that a plowed bike trail also provides an emergency access for the Squaw Valley Fire Department. The comment is an observation of current conditions, and does not address the content, analysis, or conclusions in the DEIR. Emergency access to the plan area is addressed in Chapter 15, "Hazardous Materials and Hazards," of the DEIR (see Impact 15-4 on page 15-19). Also see the portion of the traffic Master Response that addresses emergency access.

L4-14 The comment states that funding should also be provided for snow removal services to open the parking area at the Squaw Valley Park to serve as an eastern trailhead/staging area for public bike trail use. See response to comment L4-12 regarding funding for snow removal services.

The comment further states that the development agreement could include a Shared Use provision to make the park's parking area available to Squaw Valley Ski Resort as overflow parking on peak skier days. Squaw Valley Park is a County-owned and maintained facility and it is not available for joint use as suggested in the comment. There is restriction in the deed from the USFS limiting the County's improvement and use to public recreation. The development agreement referred to in the comment would be a service agreement between the SVPSD and the applicant, and would address provision of services to be provided by the SVPSD to the proposed project (e.g., water supply if the SVPSD is the provider, fire service). This agreement would be separate from the development agreement between the County and the applicant, and the County would not be a party to the development agreement with the SVPSD (nor would the SVPSD be a party to the development agreement between the County and the applicant). It is anticipated that the development agreement between the applicant and the SVPSD would include the requirements identified in the Draft EIR pertaining to those services to be provided by the SVPSD. The SVPSD development agreement could include additional provisions, such as snowplowing for the bike trail, but such provisions would be determined through negotiations between the SVPSD and the applicant.

Regarding parking, see also pages 3-16 and 3-19 of the DEIR, which describes the proposed parking plan for the project, as well as the portion of the traffic Master Response that addresses the adequacy of parking. As stated on page 9-55, the availability of parking is not considered an environmental effect. The project does propose to provide parking facilities both with the main Village and the East Parcel, and existing and planned bicycle paths will be accessible from those lots. For these reasons, there is no need to require that the project provide for plowing at Squaw Valley Park to serve as a trailhead and/or overflow parking.

L4-15 The comment states that provisions of the development agreement should define standards for snow removal services. See response to comment L4-14 regarding the development agreement.

- L4-16 The comment is correct that the Sustainable Groundwater Management Act (SGMA) does not require that a groundwater sustainability agency be formed. Therefore, the third paragraph on page 13-37 of the DEIR is revised as follows:
- On December 15, 2014, DWR announced its official “initial prioritization” of the state’s groundwater basins for purposes of complying with the SGMA and this priority list became effective on January 1, 2015 (DWR 2014). DWR has ranked the Olympic Valley Groundwater Basin as “low priority.” Groundwater sustainability plans are not required for low and very low priority basins. While the County and/or the SVPSD will still need to ~~take steps~~ decide whether to designate and/or form a groundwater sustainability agency for the Olympic Valley Groundwater Basin, these administrative obligations will not impact the availability of water to serve the proposed project or require revisions to the WSA prepared for the proposed project.
- L4-17 Mitigation Measure 13-4 in the DEIR is intended to address the situations cited in the comment. If new wells do not perform as anticipated and/or the aquifer is not as thick as assumed, so that additional wells are required or wells must be relocated, then Mitigation Measure 13-4 requires that the revised well scenario be shown to be able to meet the WSA threshold and to demonstrate that the environmental effects would not be substantially more severe than identified in the DEIR. This determination will be made in light of the threshold set forth in the DEIR, which requires ensuring that the saturation threshold identified in the WSA would be met for normal, dry, and multiple dry years for existing and future users.
- The elements identified in the second paragraph of the comment pertain to the operation of the SVPSD’s water system. The development agreement between the water provider and the project applicant could address access to wells for rehabilitation and/or replacement, access for test wells, and the area to be dedicated to individual wells (e.g., drilling islands). These elements would not alter the environmental effects of groundwater pumping or the availability of water supply.
- The County understands that discussions are underway between SVPSD and the project applicant regarding the terms of a development agreement. The County also understands that ensuring adequate access to the aquifer (e.g., reserving drilling islands) is one of the topics being addressed during these discussions.
- L4-18 The County agrees that a source of funding will have to be provided for ongoing monitoring of the aquifer and maintenance of the system. The proposed project would be responsible for funding the costs of providing water service to project development. Typically, these costs are funded through connection fees, but the development agreement between the water provider and the project applicant could provide for a different funding mechanism. Furthermore, Mitigation Measure 13-4 in the DEIR requires that the development agreement specify the process and funding for updating existing or future groundwater plans as needed to address new wells and/or changes to the proposed well field. These groundwater plans could include the Aquifer Monitoring Program, a pumping management plan, and/or other plans.
- Transfer fees are one potential funding mechanism that could be used to finance water services. The source of funds would be determined as part of the development agreement process. The source of funding does not, in itself, result in environmental effects, and therefore need not be identified in the EIR. (*Not About Water Committee v. Solano County Board of Supervisors* (2002) 95 Cal.App.4th 982 [formation of a district to provide funding for water facilities not a “project” under CEQA].)
- L4-19 Mitigation Measure 13-4 in the DEIR is designed to lessen the impacts of supplying water to the proposed project by addressing the configuration of the well-field and related operational

or management, aspects, such as the testing and monitoring of new wells (Mitigation Measure 13-4 [part B]) and consistency with the WSA. Accordingly, well-field management is fundamental to the efficacy of the mitigation measure, as this is a long-term operational condition that must be satisfied on an ongoing basis throughout project implementation and operation. The County agrees that the proper focus of Mitigation Measure 13-4 is ensuring that impacts do not exceed those predicted by the WSA, which could require aspects of managing the well field.

L4-20

The water provider would manage the operation of the wells used to supply water to the proposed project. CEQA allows for the identification of mitigation measures that must be implemented by other agencies due to jurisdictional circumstances. With respect to water supply, the County is not a water provider, and relies on water providers to supply water to development within the County. Similarly, the project applicant would not operate water supply wells, and would instead enter into an agreement with the SVPSD or a new mutual water company to provide water. That agreement would specify the financial responsibilities of the applicant for the water infrastructure and operations needed to serve the proposed project.

The DEIR contains a number of mitigation measures to address potential environmental effects related to water supply and groundwater pumping. Mitigation Measure 13-4 (part A) addresses a situation where the actual well field would differ from the well field analyzed in the WSA. Additional mitigation is required whether the actual well field is consistent with the WSA or if a new well field (or a water provider that differs from the SVPSD) is proposed. Mitigation Measure 13-4 (part B) identifies provisions that must be addressed in the development agreement, and Mitigation Measure 13-4 (part C) requires a will serve letter or other verification of water supply prior to approval of Improvement Plans. If the water provider must implement a pumping regimen or well field that differs from the WSA assumptions, then the requirements of Mitigation Measure 13-4 (part A) would apply. Mitigation Measure 13-4 (part A) addresses effects of dropping groundwater levels on the creek and Mitigation Measure 6-1 addresses impacts on vegetation in and adjacent to the creek.

The comment, and the following comment (L4-21), propose revising Mitigation Measure 13-4 to require the project applicant to take steps if observed impacts appear to differ from those predicted by the modeling performed as part of the WSA. In this instance, the WSA has been prepared based on a model developed and calibrated under the supervision of SVPSD; the performance of this particular aquifer is, therefore, far better understood than is normally the case. CEQA requires that an agency make a good faith effort to identify the impacts of the project. An EIR necessarily entails forecasting the future. (CEQA Guidelines, § 15144.) In this instance, the County believes the analysis supporting the WSA represents a good-faith effort to forecast the future based on the best available information.

The County anticipates that, if observations deviate from those predicted in the modeling supporting the WSA, the SVPSD would continue to calibrate the model, so that predicted results correspond with observations, consistent with SVPSD's ongoing maintenance of the model.

The comment proposes that the project applicant bear the risk that observed results will differ from those predicted by the model. One challenge associated with this proposal is determining causation. If observed results deviate from the model's predicted results, it may be difficult to determine whether the deviation has been caused by project-related groundwater pumping, or by some other cause. For this reason, if such a proposal is incorporated into Mitigation Measure 13-4, the revisions would need to make clear that the project applicant should be required to respond only if the deviation is shown to have been caused by project-related pumping.

Mitigation Measure 13-4 provides that ongoing monitoring will be performed in order to document the impact of groundwater pumping on the aquifer, on creek flows, and on riparian habitat. This monitoring effort will enable SVPSD to manage the well field so that observed impacts of groundwater pumping are minimized. SVPSD has existing authority to impose limits on water demand, to import water, or to identify and develop a new water source. The project applicant, as a customer of SVPSD, would be subject to this authority.

L4-21 See responses to comments 02-58 and L4-20.

L4-22 See response to comment L4-18. The County agrees that, in any event, if SVPSD supplies water to the proposed project, then a Pumping Management Plan will have to be prepared by SVPSD.

L4-23 See response to comment L4-18. Regarding the Water Management Action Plan, see response to comment L4-7.

L4-24 See response to comment L4-9. If the SVPSD is the water provider, then they would be the appropriate entity to prepare the analysis. Because SVPSD has developed and maintains the model, any such modeling would have to be performed under SVPSD's direction. If a new water company provides water service, then the water company would be responsible for the analysis, which could be prepared by its consultants or by the SVPSD. If water company consultants prepare the analysis, they would need to consult with the SVPSD.

L4-25 SB 221 applies to subdivisions of more than 500 dwelling units or, where the public water system has fewer than 5,000 service connections, to a residential development that would increase the number of connections by 10 percent or more [Government Code Section 66473.7(a)(1)]. In those cases, SB 221 requires that local agencies condition tentative subdivision maps to require that sufficient water supply be available for the development covered by the map, based on written verification from the applicable public water system [Government Code Section 66473.7(b)(1)]. If the SVPSD is the water provider, the County or the project applicant will request written verification from the SVPSD. Where a water supply for a proposed subdivision includes groundwater, the public water system must evaluate the extent to which it or the landowner has the right to extract the additional groundwater needed to supply the proposed subdivision [Government Code Section 66473.7(h)]. SB 221 does not contain specific requirements for new or replacement wells.

Mitigation Measure 13-4 (part C) requires that a "will serve" letter or letter of availability from the SVPSD or other water provider be submitted to the County with each Improvement Plan, regardless of the size or nature of the development associated with the Improvement Plan. For the first Improvement Plan, it must be demonstrated that water demand can be met with existing or planned infrastructure and that operation of that infrastructure will comply with the development agreement and applicable groundwater plans. All subsequent Improvement Plans must indicate whether a new well or wells would be needed to ensure that the overall groundwater system can be operated consistent with the assumptions of the WSA and the criteria of applicable groundwater plans (see page 13-65 of the DEIR). This mitigation measure will ensure that there is adequate water supply and infrastructure available to serve project development.

L4-26 See response to comment L4-20. Mitigation Measure 13-4, like all mitigation measures, is a binding, enforceable commitment that must be carried forward if the project is approved (Public Resources Code Section 21081.6.), whether this measure has been carried out is to be monitored by SVPSD and the County. (See Draft MMRP.) CEQA does not focus on how funding is provided to carry out the mitigation measure; rather, CEQA focuses on ensuring that the mitigation measure is carried out. SVPSD's comment that the project applicant should provide all the necessary funding is noted. In the event SVPSD and the project

applicant reach agreement regarding the terms of a development agreement, the County anticipates that this agreement will address the funding issues noted in this comment.

L4-27 Mitigation Measure 13-4 in the DEIR is designed to lessen the impacts of supplying water to the proposed project by addressing the configuration of the well-field and related operational, or management, aspects, such as the testing and monitoring of new wells (Mitigation Measure 13-4 [part B]) and consistency with the WSA. The WSA evaluates the adequacy of water supply to serve the project and cumulative development. It does not identify impacts as defined by CEQA.

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

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

In addition, the second full paragraph on page 13-73 of the DEIR is revised as follows:

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

L4-29 See response to comment L4-28.

L4-30 See response to comment L4-28.

L4-31 The comment regarding the development agreement is noted. Regarding treatment, as stated on page 3-22 of the DEIR, water treatment is planned to be provided via centralized treatment facilities located in either new or existing buildings, rather than in a separate water treatment plant. The development agreement would address the location, acquisition, and permitting of the treatment facilities. Zoning would not be an issue, because structures associated with the use of a utility are allowed with a Minor Use permit in all of the VSVSP zones except Village-Conservation Preserve and Village Forest Recreation (see Table 3.2, Allowed Uses, in the VSVSP). If the treatment were incorporated into the well site, it would be allowed in any of the zones.

At this time, it is anticipated that the only treatment that would be needed would be disinfection because the groundwater withdrawals would occur in the western portion of the aquifer, which does not need any treatment other than disinfection. As stated on page 13-25 of the DEIR, groundwater extracted from the western portion of the basin is regularly tested by the SVPSD and SVMWC, and meets federal, state, and local primary and secondary drinking water standards. Groundwater in the eastern end of the valley has been shown to contain arsenic in excess of drinking water standards (page 13-25 of the DEIR), but is not planned to be used for potable water.

L4-32 As suggested by the commenter, the first paragraph in Section 14.1.2, “Wastewater,” on pages 14-7 and 14-8 of the DEIR is revised as follows to reflect SVPSD’s projections of existing capacity:

The SVPSD owns and operates the wastewater collection system that serves Squaw Valley. The SVPSD collection system is comprised of gravity sewer lines and two siphons. The existing SVPSD sewer system serving the plan area consists of a network of private and public minor collector lines, 8 inches or less, serving the previously developed areas. These minor collector lines connect to a number of 10-inch major collector lines, and the wastewater within the major collectors flows into a 15-inch trunk line located primarily along Squaw Valley Road. This 15-inch pipe serves customers within the eastern portion of the Valley as it flows towards SR 89. The current average dry weather flows (ADWF) generated by the plan area are ~~0.632~~^{1.73} million gallons per day (MGD) while current peak wet weather flows (PWWF) are ~~0.4505~~^{2.007} MGD (~~MacKay & Soms 2012b~~^{Farr West Engineering 2014: 4}). On the east side of the highway, the system discharges to the Truckee River Interceptor (TRI), which is maintained by the Tahoe-Truckee Sanitation Agency (T-TSA). The T-TSA is a regional entity that provides wastewater transmission, treatment, and disposal services to the SVPSD as well as the North Tahoe Public Utility District, Tahoe City Public Utility District, Alpine Springs County Water District, Truckee Sanitary District, and Truckee River Canyon area (MacKay & Soms 2012b).

This information added to Section 14.1.2 does not change the conclusions in the DEIR. There is still a conclusion of **less than significant** after mitigation for Impact 14-2 (Increased demand for wastewater collection, conveyance, and treatment) because existing and upgraded (as part of the project) sewer facilities have sufficient capacity to serve the project (see pages 14-36 and 14-37 of the DEIR).

L4-33 The Sewer Study Update prepared by MacKay & Soms on March 21, 2014 is referenced throughout the DEIR, including the discussion of Impact 14-2 related to increased demand for wastewater collection, conveyance, and treatment on pages 14-36 and 14-37 of Chapter 14, “Public Services and Utilities.” Although other versions of the Master Sewer Study,

including the 2012 draft, are cited in the document, the analysis and conclusions of the DEIR are based on the most current study.

L4-34

All wastewater infrastructure—whether a sewer line, storage basin, or storage tank—“store” sewage. There is nothing unusual about a storage basin that would cause it to leak versus a sewer line. In more likelihood, because detention basins would not have as many connecting joints as sewer lines, there is less likelihood that one would leak; they have less avenue for failure. In considering the effects of implementing Mitigation Measure 14-2a, it was assumed that any wastewater detention facilities would be designed and maintained in such a way that all effluent would be fully contained within the system. This would greatly diminish any potential for operational, equipment, or facility failure to result in discharge of wastewater to the natural environment.

To provide clarification, Mitigation Measure 14-2a on pages 14-36 and 14-37 of the DEIR is revised as follows:

Mitigation Measure 14-2a: Provide sufficient on-site wastewater storage.

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

Further, as detailed in Chapter 13, “Hydrology and Water Quality,” the project includes proposed upgrades to the onsite wastewater transmission system, which may reduce the potential for contamination of surface and groundwater resources (especially where existing sewer lines cross Squaw Creek) compared to existing conditions. The project therefore does not avoid installing basic utility infrastructure. Sewer improvements are required to be designed to meet SVPDS standards and California DHS regulations, and be constructed in compliance with Placer County DPW General Specifications Section 71, as well as all other applicable law at the time. The resulting sewer infrastructure would meet standards set for sound construction and prevention of leaks. Guidance provided by DWR for separation of water wells from potential contamination sources (including wastewater infrastructure) is expected to further minimize the potential for contamination (see page 13-46 of the DEIR).

L4-35

See response to comment L4-34.

L5

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VIA U.S. MAIL AND E-MAIL

16 July 2015

Ms. Maywan Krach
Placer County Community Development Resource Agency
Environmental Coordination Services
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RE: Village at Squaw Valley Specific Plan Project DEIR Comments

Dear Ms. Krach:

The Tahoe-Truckee Sanitation Agency (T-TSA) provides the following comments to Placer County on the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley Specific Plan (VSVSP) Project (Project).

T-TSA provides regional wastewater treatment service to several Tahoe & Truckee area communities in portions of El Dorado, Placer, and Nevada counties through the Agency's five member sewage collection districts - the North Tahoe Public Utility District, the Tahoe City Public Utility District, the Alpine Springs County Water District, the Squaw Valley Public Service District (SVPSD), and the Truckee Sanitary District (TSD). The TSD also serves the Northstar Community Services District (NCSD) by way of an agreement. T-TSA owns, operates and maintains the Truckee River Interceptor (TRI), a main trunk line for raw sewage conveyance, and the regional Water Reclamation Plant (WRP), both of which are described in more detail below.

The 17-mile long TRI pipeline runs along the Truckee River corridor between Tahoe City and the WRP in Truckee. The interceptor flows exclusively by gravity and varies in size from 24- to 42-inches in diameter. The interceptor conveys all of the untreated, raw sewage collected from the northern and western shores of Lake Tahoe, Alpine Meadows, Squaw Valley, and Truckee. Wastewater from the Northstar development is conveyed to T-TSA via an export agreement between NCSD and TSD.

The WRP regional facility is designed to treat and dispose of the sewage delivered by the TRI. Through a series of biological, chemical and physical processes, the wastewater is purified to a degree where surface and ground water quality is protected. Wastewater flow to the facility varies in quantity and quality in proportion to the population present during the year. The WRP

L5-1

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is principally sized to treat the maximum sewage flows that occur during peak holiday periods with the large influx of seasonal residents and visitors. The capacity of the WRP is 9.6 million gallons per day (mgd) on a maximum 7-day average flow basis during the summer months.

L5-1
cont.

T-TSA has reviewed the DEIR, and other available Project information, and offers the following comments:

1. **Peak Wet Weather Flows:** As accurately described in Impact No. 14-2 on Page 2-81 of the DEIR, T-TSA does not currently have capacity in the Truckee River Interceptor (TRI) to serve both existing customers and the expected wastewater flows generated by the proposed Project during peak wet weather flow periods. The capacity of the TRI may be exceeded at these times. As described on Page 3-25 of the DEIR, T-TSA is currently studying, as a separate action, the possibility of upsizing and replacing certain sections of the TRI to address some of the system’s existing hydraulic bottlenecks.
2. **T-TSA Fixture Counts:** The DEIR lacks the finalized fixture counts and other T-TSA billing factors counts that we had requested be included for the overall Project. Please provide these fixture counts for all aspects of the development including all residential and commercial developments, hotel & conference facilities, restaurants, skier services, mountain operations and maintenance facilities, snow-making facilities, employee housing units, the Mountain Adventure Camp, other recreational and resort-based facilities and any other development features that would generate wastewater flows.
3. **Characterization of Housing Units:** With respect to the number of units and bedrooms provided for the various types of accommodations to be constructed (e.g., hotels, condo hotels, fractional ownership, timeshare units, cabins, etc.) referred to throughout the DEIR, please further characterize any lock-off units per our previous requests and verify that they would not include kitchen sinks (sinks with dimensions 15-inches by 15-inches by 7-inches deep, or greater) or cooking facilities (microwaves, ovens, stovetops, or any other cooking facilities).
4. **Peak Instantaneous Backwash and Drainage - Water Quality and Discharge Flowrates:** The DEIR lacks information on anticipated water quality and peak instantaneous flowrates that would be discharged to the sanitary sewer system from the Mountain Adventure Camp, pools, hot tubs, spas, and the like for the entire development. Does the applicant still intend on constructing flow equalization facilities for these specific development features to minimize the impacts of large instantaneous discharges as had been discussed in various planning meetings? Please provide all of this finalized information, including water quality characteristics, peak instantaneous backwash flowrates, durations, and timing of all discharges to the sewer system in order to assist the Agency in determining the demands imparted on its systems from these amenities.
5. **TRI Capacity:** The information from the cited reference shown in the last paragraph of Section 14.1.2 on Page 14-8 was obtained from old survey information for other projects that was later determined to be incorrect. As such, T-TSA had multiple conversations with VSVSP Project staff in 2012, where T-TSA staff had reiterated that more information needed to be gathered and evaluated before the remaining capacity of the

L5-2

L5-3

L5-4

L5-5

L5-6

TRI could be accurately quantified - a proper survey of the entire TRI needed to be performed and a hydraulic model developed prior to assessing remaining capacities in T-TSA's facilities for the VSVSP Project and the cumulative effects of other projects. VSVSP Project staff had been informed that these follow-up analyses could only be performed after T-TSA had received detailed information about the total potential sewage flows to be generated by the Project. As accurately portrayed in other sections of the DEIR, it has since been determined that there currently is inadequate capacity in the TRI to serve the both existing customers and expected flows generated by the proposed Project during peak wet weather flow events. As described above, T-TSA is currently studying, as a separate action, the possibility of upsizing and replacing certain sections of the TRI to address some of the system's existing hydraulic bottlenecks.

L5-6
cont.

- 6. **WRP Capacity:** The paragraph beginning with "The SVPSD owns and operates..." on Page 14-36 contains inaccurate, outdated information on remaining capacities at the WRP. Although there currently appears to be sufficient capacity at the WRP to serve projects as large as the VSVSP Project, all capacity allocations are made on a first-come, first-serve basis for all customers and projects within T-TSA's service area. T-TSA does not reserve capacity for specific Projects and does not issue Will Serve letters as suggested by this paragraph.

L5-7

T-TSA would like to thank Placer County for the opportunity to provide these comments. We look forward to reviewing how our concerns are addressed. If you have any questions or concerns, please do not hesitate to contact me at (530) 587-2525.

Sincerely,



LaRue Griffin
General Manager/Treasurer

- c: Jay Parker, T-TSA
Tom Rinne, T-TSA
Mike Geary, SVPSD

-
- L5** Tahoe ~ Truckee Sanitation Agency
LaRue Griffin, General Manager/Treasurer
July 16, 2015
-
- L5-1 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.
- L5-2 The comment indicates agreement that the DEIR accurately describes the conditions referenced. The comment is noted. No specific issues related to the analysis or conclusions in the DEIR are raised in this comment. No further response is provided here.
- L5-3 The comment requests specific details about building design (number of fixtures) that may be important for general operations but are not required to address the impacts of the proposed project. The DEIR determined wastewater generation based on detailed analysis of project uses, typical peaking factors, etc. See the discussions on page 14-36 and supporting referenced documentation. Fixture counts were provided to Tahoe ~ Truckee Sanitation Agency (T-TSA) in a technical memorandum prepared by MacKay & Soms and transmitted to T-TSA via email on September 3, 2014. To the extent that finalized fixture counts are required, this information will be relayed to T-TSA at the time that entitlements for a specific development phase are sought.
- L5-4 Information about lock-off units was provided to Linda Coberly of T-TSA via email from Nelson Tejada of MacKay & Soms on October 30, 2014. As described in this correspondence, lock-off units would be included in the two- and three-bedroom configurations of the condo hotel units. For the two-bedroom condo hotel units, there would be a central parlor and kitchen that either of the bedrooms could be locked off from. Similarly, with the three-bedroom configuration, all three bedrooms could be locked off (two of the lockoffs would be configured to have a single bedroom with attached bathroom and the third would be configured to have a bedroom, bathroom, parlor, and kitchen).
- L5-5 As disclosed in the DEIR, the Truckee River Interceptor (TRI) may not be able to accommodate peak flows generated by the project at its current size and configuration. Although T-TSA is considering upgrading the TRI, development and approval of such an upgrade would be separate from the proposed project and implementation cannot be guaranteed. Pursuant to Mitigation Measure 14-2a in the DEIR, if T-TSA finds that project-generated peak wastewater flows may exceed the capacity of the TRI at the time specific elements of the project are proposed to be constructed, flow equalization facilities (such as wastewater detention facilities, enlarged pipes, vaults, or tanks that can provide peak storage) shall be incorporated into the VSVSP to time wastewater flows to off-peak conditions when the TRI has sufficient capacity. The project applicant shall work directly with T-TSA to determine a sufficient volume of detention capacity and to define the methodology for determining when wastewater detention facilities should be used, and timing for releases from these facilities. Water and sewer demand calculations for the MAC were prepared by MacKay & Soms and submitted to Squaw Valley Public Service District in December 2014. Peak instantaneous flows generated by the MAC would be attenuated through the use of a 12,000-gallon equalization tank. Finalized water quality characteristics, peak instantaneous backwash flow rates, and durations and timing of all discharges to the sewer system would be provided to T-TSA as individual project elements move from the current illustrative plan/Specific Plan phase to the engineering, design, and detailed permitting phase.
- L5-6 The comment relates to a statement in Section 14.1, "Existing Setting," of Chapter 14, "Public Services and Utilities," of the DEIR. To more accurately describe the remaining capacity of the TRI, the last paragraph of Section 14.1.2, "Wastewater," is revised as follows:

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

As indicated in response to comment L5-2, Impact 14-2 in the DEIR correctly characterizes the current condition of the TRI and discloses that there may not be sufficient capacity during peak flow periods to serve the project in addition to existing flows. Therefore, this text modification does not change the analysis or conclusions reached in the DEIR.

In addition, Mitigation Measure 14-2a is revised as follows to reflect coordination with SVPSD:

Mitigation Measure 14-2a: Provide sufficient on-site wastewater storage.

In the event that T-TSA finds that project-generated peak wastewater flows may exceed the capacity of the TRI, wastewater detention facilities, such as enlarged pipes, vaults, or tanks, shall be incorporated into the Specific Plan to time wastewater flows to off-peak conditions when the TRI has sufficient capacity. These facilities will be located within the plan area and will be underground or otherwise incorporated into project's development footprint (e.g., incorporated into a building podium and/or the Mountain Adventure Camp). The project applicant shall work directly with T-TSA to determine a sufficient volume of detention capacity and to define the methodology for determining when wastewater detention facilities should be used, and timing for releases from these facilities. A SVPSD representative's signature ~~from T-TSA~~ shall be provided on the Improvement Plans.

L5-7

The first paragraph under "Impact 14-2: Increased demand for wastewater collection, conveyance, and treatment" on page 14-36 of Chapter 14, "Public Services and Utilities," of the DEIR is revised as follows to reflect the information provided in the comment:

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

L6

Town Council

Alicia Barr, Mayor
Joan deRyk Jones, Vice Mayor
Carolyn Wallace Dee, Council Member
Patrick Flora, Council Member
Morgan Goodwin, Council Member



Department Heads

Tony Lashbrook, Town Manager
Andy Morris, Town Attorney
Adam McGill, Chief of Police
John McLaughlin, Community Development Director
Kim Szczurek, Administrative Services Director
Judy Price, Town Clerk
Alex Terrazas, Assistant Town Manager
Daniel Wilkins, Public Works Director/Town Engineer

July 15, 2015

Ms. Maywan Krach
Environmental Coordination Services
Community Development Resources Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Town of Truckee Comments on Village at Squaw Valley Specific Plan Draft EIR

Dear Ms. Krach;

Thank you for the opportunity to comment on the Draft EIR for the proposed Squaw Valley Specific Plan. At a recent Town Council meeting, Town staff presented an overview of the Specific Plan and its associated environmental impacts. While the scale of the Specific Plan is large, it is located several miles south of the Town of Truckee so our comments and concerns focus on issues and impacts of regional concern or on potential impacts within the Town of Truckee that may result from the proposed project. Accordingly, the Council has the following comments for inclusion in the Final EIR.

L6-1

(1) Transportation and Circulation

Several concerns were voiced during the Council's discussion over impacts to roadways located in and adjacent to the Town of Truckee. The following is a summary of these concerns:

Impacts to Caltrans Highways

The Draft EIR concludes that the proposed project would exacerbate already unacceptable operations on Segments of SR 89 between Deerfield Drive and West River Street and that this is a significant impact. Mitigation Measure 9-5 notes that the segment of SR 89 between Deerfield Drive and West River Street is conceptualized as a four-lane conventional highway (i.e. it would be widened from two to four lanes). However, the Draft EIR notes that such a widening project is not currently included in any adopted planning documents or fee programs. The Draft EIR thereby concludes that because there are no available mechanisms to provide an acceptable level of service within that segment, impacts would be significant and unavoidable.

L6-2



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Community Development: 530-582-7820 / Fax: 530-582-7889 / email: cdd@townoftruckee.com
Animal Services/Vehicle Abatement: 530-582-7830 / Fax: 530-582-7889 / email: animalservices@townoftruckee.com
Police Department: 530-550-2328 / Fax: 530-550-2326 / email: policedepartment@townoftruckee.com
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While the impacted roadway is a Caltrans facility, impacts will result within the Town of Truckee and the increased Average Daily Trips (ADT) will impact the town's circulation patterns during the critical summer PM peak time period. The Town recognizes that even with mitigation, impacts may remain significant and unavoidable; however the Town encourages Placer County and KSL to take additional steps to require ways to reduce and minimize the traffic impacts associated with buildout of the Specific Plan. Specifically, the Town believes there are a range of mitigation measures available which would further reduce the impacts associated with increased traffic volumes on SR 89. Below are several suggestions for the County's consideration:

- Include specific mitigation measures to reduce both existing (i.e. baseline) and new ADT associated with the project. Efforts to reduce existing ADT will lessen the impacts associated with new ADT for this roadway section subject to significant impacts.
- Include specific mitigation measure to provide enhanced transit services beyond those identified as part of a fair-share contribution by the applicant. These methods could include more frequent headways, extended hours of operations and/or expanded route options beyond those associated with the expected increase in transit demand. These methods would be directed at reducing trips generated by both visitors and employees who stay or reside outside of Olympic Valley. Options include enhanced shuttle service from lodging facilities for visitors, and enhanced transit opportunities for employees. In other words, a greater contribution would be made beyond what is required as part of Mitigation Measure 9-7 and would facilitate reduced impacts to the overall ADT, especially related to this roadway segment.
- Include a specific mitigation measure to require Transportation Demand Management (TDM) options for both existing and new employees. This could include a shuttle service, rideshare program, employee programs which incentivize alternative transportation methods or other similar types of programs aimed at reducing ADT associated with resort employees.

L6-2
cont.

These measures appear to be reasonable and within the ability of Placer County and KSL to accomplish and as such should be incorporated as mitigation measures.

Additionally, under Section 18-21 – Cumulative Impacts to Caltrans Intersections, several additional intersections within the Truckee town limits are identified, including SR89/Donner Pass Road and two ramps at I-80/SR89, which are projected to have significant and unavoidable impacts. The methodology used to make this determination appears different than that used by the Town of Truckee in our traffic modelling efforts. SR89/Donner Pass Road is included within the Town's traffic impact fee program, contrary to the statement on page 18-24 of the DEIR. The Town has serious concerns with these determinations and disagrees that "there is no timely mechanism available to achieve an acceptable LOS" at this intersection and requests that prior to any formal adoption of the specific plan that Placer County contact the Town of Truckee regarding these intersections. Should this impact be determined to be significant, options for effective mitigation of these significant impacts may be available, including specific infrastructure improvements.

L6-3

The Town spent in excess of \$3 million in local funds to construct the roundabout improvements at I-80/SR89 to create adequate capacity that would limit negative impacts to the Town roadway network. The Town requests the opportunity to meet with Placer County and Caltrans regarding these specific intersections and the significant impacts identified.

L6-4

Overall, it is the Town's position that greater efforts can be made to mitigate the significant impacts associated with the additional traffic generated. Mitigation can include infrastructure improvements to the SR89 corridor from Deerfield Drive to West River Street, including adding lanes at the Mousehole, or participating with an equitable financial contribution to this regional improvement. Similarly, infrastructure improvements can be made to the SR89/Donner Pass Road intersection, including the installation of a roundabout, to mitigate the significant impact.

L6-5

Additional reductions in traffic may also be realized by the development of greater amounts of employee housing in Olympic Valley.

L6-6

The Town also recognizes that traffic through these areas determined to have a significant impact could also be lessened through a reduction in the scale of the projects identified in the Specific Plan. It is appropriate to consider reduced development alternatives which would result in lower traffic impacts.

L6-7

Impacts to Transit

As discussed in the Draft EIR, the Specific Plan describes several planned transit service expansions, some of which are listed as policies in the Specific Plan. However, the policies and service expansions do not explicitly require that the applicant ensure that an adequate supply of public transit service be available to meet the anticipated demand and therefore, impacts are significant. Mitigation Measure 9-7 requires a fair-share contribution or formation of a CSA or CFD to pay for the costs of increased transit demand.

L6-8

As noted above under the Transportation and Circulation discussion, the Town believes it is appropriate to require the developer to provide enhanced transit services beyond those identified in the Draft EIR mitigation measure. Recognizing the current limited usage of transit by both resort employees and guests, improving and enhancing transit services could have significant implications for both traffic and circulation impacts. Increased transit service could provide mitigation for the significant and unavoidable impacts identified for transportation and circulation in the region.

Construction Impacts

The Draft EIR concludes that project construction would generate employee and truck trips which would use segments of SR 89. These activities could cause lane closures, damage to roadways, and increased conflicts with bicyclists and pedestrians and would lead to significant impacts. Mitigation Measure 9-8 requires implementation of a construction traffic management plan which will reduce impacts to less than significant levels. If future construction plans are expected to rely on import or export of materials to or from the Teichert aggregate mine located in Truckee, the Town requests the County amend Mitigation Measure 9-8 to include Town of Truckee roadways in the construction traffic management plan. Further, the

L6-9

plan should require consultation with Town staff regarding construction traffic impacts and additional mitigation measures necessary to ensure impacts are minimized.

L6-9
cont.

(2) Workforce housing

As discussed in the Draft EIR, the project is anticipated to generate an additional 574 new full-time employees annually and up to 751 new peak winter employees. The Draft EIR notes that the East Parcel project is expected to accommodate 27% of the new employees and that the remainder of employees (73%) are expected to reside elsewhere within or outside of Olympic Valley. Similar to the Town's comments under Transportation and Circulation, the Town encourages the County to require ways of minimizing the impacts of both existing and new employees. Several suggestions are provided above which are intended to reduce the ADT associated with those employees who currently reside in Truckee or will reside in Truckee in the future.

L6-10

Specific housing strategies should be developed as part of the Specific Plan to address meeting the requirement to provide housing to a minimum of half of new FTE's generated by the project operation. The greater the number of employees accommodated within Olympic Valley, the greater reduction in traffic impacts to the region. Additionally, the housing options should provide for a broader range of housing types (additional 1- and 2-bedroom apartments to supplement the proposed dormitory and studio units) to meet a wider range of housing needs for employees.

L6-11

The Town recognizes that the employee housing strategy is tied closely to transportation impacts due to employee vehicle trips for those not housed in Olympic Valley. While Placer County's policy is to provide housing for 50% of new FTE, in attempts to address the greater traffic impacts, it would be beneficial to provide housing based on the total number of employees (full and part-time) rather than limited to an FTE calculation.

L6-12

The Town is also concerned that deferring the employee/workforce housing plan to a future date with a combination of options that may not include on-site employee housing will create an unknown impact outside of the specific plan area that cannot be analyzed. The use of in-lieu fees for unidentified future projects, or other unidentified off-site housing options may end up impacting roadways and intersections beyond the analysis provided in the DEIR. The workforce housing plan must be developed and analyzed concurrent with the specific plan.

Any employee housing required as part of the implementation of the Specific Plan should be developed concurrently with each phase of the development. The employee housing should not be deferred to later phases of the project. The Town of Truckee raised similar employee housing concerns during the EIR process for the Village at Squaw Valley USA in 1999 (comment letter attached). It does not appear that any employee housing was developed in Olympic Valley as part of that project, and it is unclear whether any in-lieu fees were collected and utilized for mitigation of the housing impacts. The Town continues to be concerned with this project, and reiterates that a clear and implementable workforce housing plan must be developed and analyzed concurrent with the specific plan.

L6-13

(3) Long-Term Water Supplies

During this time of drought, the Town of Truckee is concerned regarding the long-term availability of adequate water supplies within Olympic Valley to support the range of development envisioned within the specific plan. The Town encourages the County to carefully examine the information provided regarding water availability, and to consider the regional impacts should additional water supplies be required.

Squaw Valley Public Services District has stated a desire to acquire a backup water source for Olympic Valley, identifying the Martis Valley aquifer as a potential source. The build out of the Squaw Valley Specific Plan will likely increase the need for this backup source. Town of Truckee citizens, through the Truckee Donner Public Utility District, receive their water from the Martis Valley aquifer. Additional demand placed on this aquifer could have regional water impacts, and should be studied as part of the review of the specific plan.

L6-14

The Town of Truckee sincerely appreciates the ability to review and comment on this important project as part of the environmental review process. We are committed to working closely with the County and the project team to clarify and address our concerns and will make key staff available to do so. Should you have any questions or need clarification related to any of our concerns, please contact Town Manager Tony Lashbrook at 530.582.2901 or tlashbrook@townoftruckee.com.

Sincerely,



Alicia Barr
Mayor
Town of Truckee

Attachment: June 10, 1999 letter regarding Draft EIR for Village at Squaw Valley USA

Town Council
 Josh Susman, Mayor
 Maia Schneider
 Ronald J. Florian
 Don McCormack
 Robert W. Drake



LETTER 7
Department Heads

Stephen L. Wright, Town Manager
 J. Dennis Crabb, Town Attorney
 Thomas E. Covey, Public Works
 Daniel P. Wilkins, Town Engineer
 Tony Lashbrook, Community Development
 Jill R. Olsen, Administrative Services

June 10, 1999

PLACER COUNTY
 DATE
 RECEIVED

JUN 14 1999

Bill Combs, Senior Planner
 Placer County Planning Department
 11414 "B" Avenue
 Auburn, CA 95603

PLANNING DEPARTMENT

RE: Comments on Draft EIR for Village at Squaw Valley USA

Dear Mr. Combs,

The Town of Truckee appreciates this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley USA project. Conceptually, the Town is encouraged that the proposal may benefit the Resort Triangle. However, it is critical to the region that significant environmental impacts be fully disclosed and adequately mitigated. The Town's review and comments on the DEIR are focused on two areas that may result in significant impacts on the Town of Truckee and the region – housing and traffic. These are the same issues raised by the Town last year during the Notice of Preparation process for the DEIR. Please review and consider the following comments.

I. Housing

A. **General Comments** – The Town concurs with the general conclusions of the Draft EIR on housing: the project will create a substantial demand for new housing for employees and this impact will be significant and unavoidable until sufficient employee housing is constructed to meet this demand. Beyond the general conclusions, however, the Town has serious concerns regarding the DEIR's lack of information to properly analyze the project's housing impact including:

- use of a qualitative threshold of significant rather than a quantitative threshold,
- the mitigation measures proposed by the DEIR do not ensure that employee housing will be constructed that mitigate significant housing impacts,
- failure to address other alternatives and mitigation measures that would result in the construction of the necessary housing.

7-1

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Letter to B. Combs, 6/10/99
Page 2

By failing to address these issues, the DEIR fails to adequately address the project's housing impact on the Tahoe-Truckee region or more specifically on the Town of Truckee. Further, the Town does not concur with the EIR's approach in mitigating the project's housing impacts by relying on other private developers and the Placer County Housing Authority to provide the project's employee housing in areas away from Squaw Valley. We are concerned that the project will result in a substantial number of the project's employees residing in Truckee without Placer County exploring the alternatives of requiring employee housing as part of the project or, at the very least, requiring the project proponent to construct employee housing in suitable areas in the region. The Town is willing to discuss the need to construct some of the project's employee housing in Truckee, however, we cannot discuss and cooperate effectively with Placer County on these regional housing issues unless there is full disclosure in the EIR regarding the project's housing impacts. More specific comments follow.

7-1
Co

B. Housing Information – The DEIR lacks even the most basic information on the project's employee housing needs to allow a proper assessment of the project's housing demand and evaluation of its environmental impacts associated with housing. The project description for housing on Page 4.10-8 states that the project will add 450 jobs to the Squaw Valley area, most of the additional employees would be required to seek housing accommodations in other neighboring areas, and the project may increase the demand for affordable housing in the region. These general statements frame the problem adequately, but the DEIR fails to provide answers in response to these statements that are necessary to truly understand the extent of the project's impact on housing. At a minimum, the Town requests that the following information be included in the DEIR:

7-2

1. *The number of housing units necessary to provide housing for the 450 employees (i.e. the housing demand for the project).*
2. *The distribution of the employee's housing demand, i.e. how many employees will be able to find housing in Squaw Valley and how many employees will be required to seek housing in the North Lake Tahoe area, Truckee area, and other areas with estimates provided for each of these areas.*
3. *The number of affordable housing units necessary to provide housing for the 450 employees and the definition of "affordable" used by the DEIR.*
4. *A discussion of the current availability of vacant housing units that would be affordable to typical employees of the project.*

C. Threshold of Significance and Impact Analysis – Thresholds of significance are identified in the DEIR for housing to indicate if the project will have a significant effect. Unfortunately, these thresholds are qualitative and do not provide a quantitative standard to review significance, although Placer County General Plan Policy 2.A.18 presents a defined, quantifiable threshold of significance to evaluate the project's housing impacts. It states that the project must provide for employee housing equal to 50% of the housing demand generated by the project. This threshold, if used, would provide clear guidance

7-3

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Letter to B. Combs, 6/10/99
Page 3

on whether the project will have significant housing impacts. If the project provides less than 50% of the required housing, the jobs-housing balance and housing demand impacts will be significant; if the projects provides 50% or more of the required housing, these impacts will be less than significant. Because a quantitative threshold of significance provides a better guideline for determining significance and the Placer County General Plan provides a clear threshold for determining housing impacts, *the Town requests that the EIR use Placer County General Plan Policy 2.A.18 as a threshold of significance for housing.* With the information listed in Paragraph 1.B above, the impact analysis for housing will provide clear and concise information allowing the readers of the EIR, and ultimately the decision-makers, to understand the project's housing impacts and their significance.

7-3
Cont'd.
7-4

The Truckee General Plan projects that approximately 40 very low- to low-income affordable housing units will need to be constructed in Truckee annually to meet our affordable housing needs. These projections were based on the assumption that affordable housing would need to be provided for service workers in ski and summer resort and other businesses in the Donner Summit area, Truckee, and Martis Valley. It was assumed that employee housing for resorts in North Lake Tahoe, Alpine Meadows, and Squaw Valley would be provided in those respective areas. *The EIR should estimate the number of housing units that would be constructed in Truckee under the proposed mitigation.* This number will vary if other mitigation measures are adopted to address housing impacts. In addition, *the EIR should address the secondary impacts that will arise upon implementation of the mitigation measure.* If the EIR foresees that housing will be needed in the Truckee region to serve the project's employees, the Town has identified several secondary impacts including impacts on the availability of affordable housing in the Town of Truckee, the Town's efforts to provide affordable housing for our projected housing demand, and on providing general services such as health and other human services, recreation, law enforcement, schools, and other general government services. *The Town requests that the EIR analyze the potential environmental effects including secondary impacts that may occur if the project will result in a demand for housing in Truckee by its employees.*

7-5
7-6
7-7

D. Mitigation Measure – The recommended mitigation measure does not describe how the mitigation measure will produce the required number of employee housing units. Consequently, it is not possible to estimate or ultimately measure the effectiveness of the mitigation measure and whether or not it mitigates the jobs-housing imbalance to a less-than-significant level. In fact, it is impossible to determine if the project is even consistent with the Placer County General Plan. Our concern with the current mitigation measures include:

7-8

- The amount of the fee is not specified (it is presumed that the fee would be determined after project approval by staff with little or no guidelines to provide staff with an understanding of the objective of the mitigation measure),
- the relationship between the fee and the dollars necessary to facilitate construction of employee housing is not specified,

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Letter to B. Combs, 6/10/99
Page 4

- The EIR contains no analysis of the availability of sufficient sites in the North Lake Tahoe-Truckee region to accommodate the project's housing needs without adversely affecting the region's current housing shortfalls and needs,
- The EIR does not specify how much employee housing will actually be constructed as a result of this mitigation measure.

Comments 1.B and 1.C address the need to have a quantifiable threshold of significance in order to properly assess and mitigate the housing impacts to a less-than-significant level. The mitigation measure falls well short of providing a nexus between the mitigation measure and the intended result of the mitigation measure (the construction of employee housing) and showing how the mitigation measure will reduce the housing impacts to a less-than-significant level. In fact, the mitigation measure defers action in providing employee housing with an established time limit and relieves the project proponent of responsibility upon payment of an unknown housing fee without establishing a specific goal or target that must be met by the project proponent to provide employee housing. This places most of the burden on public housing agencies, non-profit housing organizations, and private developers to construct the project proponent's employee housing. There is no discussion or evidence on how the mitigation measure will result in the construction of employee housing for the project nor how it will reduce the project's housing impacts to a less than significant level.

The Town requests that the following comments be addressed and incorporated into the EIR to alleviate these substantial shortcomings:

1. *The in-lieu housing fee must be quantified with a timing schedule of when the fee must be paid. The EIR must discuss how this in-lieu housing fee, acting as a subsidy, low-interest loan, or other financial assistance mechanism, will serve as a catalyst in the construction of new housing and whether the in-lieu fee is of the proper amount that will result in the construction of the required number of housing units.*
2. *An analysis of how long it will take before the required housing is constructed. This is important in order to understand the length of time that the short-term significant and unavoidable housing impacts will occur (1 year, 5 years, 10 years?).*
3. *Potential housing sites and their feasibility for future housing must be identified and discussed in order to determine whether there are sufficient sites in the region to accommodate the required housing. This information and the information described in Paragraph 1.D.1 are necessary to fully understand whether the mitigation measure will directly result in the construction of new housing or whether other factors including a housing fee that is too low will preclude the mitigation measure from being successfully implemented to provide housing for the project's employees. This discussion must be tied into an analysis of whether affordable housing for the project's employees will hinder the efforts*

7-8
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Letter to B. Combs, 6/10/99
Page 5

of Placer County and Truckee to meet their existing and future affordable housing needs.

- 4. *The mitigation measure should have quantified performance criteria – how much housing must be constructed with the housing fees to meet the project’s employee housing needs. The mitigation measure should have a time limit by which the required number of housing units must be constructed with a contingency mitigation measure that will be automatically triggered if these performance criteria are not met. The contingency measure would need to directly result in the construction of housing units to meet the project’s employee housing needs.*

7-8
Cont'd.

E. Other Mitigation – The Town believes that the formulation of precise means of mitigating the jobs-housing imbalance or housing demand impacts is feasible and practical at this time. The DEIR should identify other mitigation measures that could substantially lessen the housing impacts and discuss why it is thought that these mitigation measures are not feasible or practical. The mitigation measures could be implemented as a group so that the housing impacts are addressed in several different ways. *The Town requests that the following mitigation measures be identified and discussed in the EIR:*

- 1. *Setting aside a certain number of the project’s housing units for employees, either short-term (until employee housing is constructed elsewhere) or long-term.*
- 2. *Constructing employee housing as part of the project.*
- 3. *Finding suitable sites in Squaw Valley and constructing or assisting in the construction of employee housing. As in Truckee, this could even include facilitating second units on existing single-family residential areas.*
- 4. *Finding suitable sites in the North Lake Tahoe-Truckee region and constructing or assisting in the construction of employee housing or adding new housing to the existing housing stock.*

7-9

If it is ultimately decided not to implement these mitigation measures or other possible mitigation measures, it should be discussed in the EIR why these mitigation measures are not being required (i.e. why the mitigation measures are not feasible).

2. Traffic

In general, the traffic analysis appears to be technically adequate in terms of identifying appropriate trip generation rates and the magnitude of the potential impacts to the local circulation system. The focus of the Town’s comments on traffic are the proposed mitigation measures and the adequacy of those measures to mitigate all potentially significant impacts of the project. The following presents a discussion of proposed mitigation measures related to traffic flow to, from and within the Truckee Town limits, and the adequacy of those measures to fully mitigate all impacts.

7-10

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Letter to B. Combs, 6/10/99
Page 6

Mitigation Measures 4.7-1 and 4.7-2

While these projects are currently in the Town of Truckee CIP, funding sources and designation of a lead agency for the intersection reconstruction projects have not yet been secured. Because traffic from the proposed project will create a significant impact at these two intersections, it would be appropriate to condition the project applicant to construct the intersection improvements prior to issuance of a building permit for the project. Additionally, the Town of Truckee has a General Plan policy that requires alternatives to signalization be considered when appropriate. Given the significant available right-of-way at these intersections and favorable grades, any intersection improvement alternatives should consider modern roundabout construction as an option to signalization.

Because the details of how the fair share funding allocations were determined are not presented, the Town has no basis to determine whether or not these percentages are appropriate. Additional detail should be provided as to how the fair share funding percentages were determined for this mitigation with the opportunity for the Town of Truckee to provide further comment as to the adequacy of the methodology. Because this project is currently in the conceptual stages, fully engineered plans, specifications, and detailed cost estimates are currently not available. Therefore, a mechanism should be developed whereby the project applicant would pay its fair share of all project-related costs including, but not limited to, design, engineering, permitting, construction management, and actual construction costs. This mechanism would be easily implemented if the intersection improvements are conditioned on building permit issuance. All engineering and/or design of these projects should be done in close consultation with the Town of Truckee, Caltrans, Placer County, Nevada County Transportation Commission, and the project proponent's staff through the formation of a project design team.

7-11

Mitigation Measure 4.7-3

The Town of Truckee has a General Plan policy that requires alternatives to signalization be considered when appropriate. Given the significant available right-of-way at this intersection and favorable grades, any intersection improvement alternative should consider modern roundabout construction as an option to signalization.

Because the details of how the fair share funding allocation was determined are not presented, the Town has no basis to determine whether or not this percentage is appropriate. Additional detail should be provided as to how the fair share funding percentage was determined for this project with the opportunity for the Town of Truckee to provide further comment as to the adequacy of the methodology. All engineering and/or design of this project should be done in close consultation with the Town of Truckee, Caltrans, Placer County, Nevada County Transportation Commission, and the project proponent's staff through the formation of a project design team.

7-12

Mitigation Measure 4.7-8

In order to mitigate impacts to the State Route 89 corridor between Squaw Valley and Truckee, the project applicant should be required to implement a coning program which establishes a peak

7-13

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Letter to B. Combs, 6/10/99
Page 7

direction HOV lane during peak demand periods. This would provide preference to transit vehicles and carpools with 4+ occupants during periods of congestion on State Route 89. This mitigation would not require widening of SR 89, but would provide an HOV lane during periods of congestion that occur on holiday and peak weekends.

7-13
Cont'

Mitigation Measure 4.7-13

The Town of Truckee, the Nevada County Transportation Commission, and the Placer County Transportation Commission are currently exploring funding sources for capacity enhancements at the Mousehole. Initial studies performed on the Mousehole have identified both two- and four-lane road and bridge construction alternatives that would significantly improve pedestrian and vehicle safety and flow on this section of State Route 89. The State Route 89/Union Pacific Railroad Grade Separation Feasibility Analysis Report considered a range of options to improve pedestrian and traffic circulation in this area. Conclusions of this report identify that it may be possible to accommodate future traffic loads with an improved two-lane cross section, which would require an additional or replacement structure to the existing Mousehole.

7-14

The report is clear that the existing structure is deficient in accommodating existing and future traffic demand. The conclusion that the addition of traffic to the Mousehole creates significant impacts is accurate. The conclusion that these impacts are unmitigatable, however, is inaccurate. Impacts of this project to the traffic flow at the Mousehole could be mitigated through a fair share funding contribution to the improvement of the Mousehole. The Nevada County Transportation Commission is currently planning a corridor study along State Route 89 from Donner Pass Road to West River Street. This study will consider feasibility of roundabout construction at key intersections along this corridor and determine the ultimate preferred cross section and potential constraints and funding sources for the Mousehole reconstruction. Participation of this project in funding for the Mousehole improvement would mitigate the projects impacts to a less than significant level.

Mitigation Measure 4.7-16

It is not clear how the fair share allocation of 11 percent of transit route costs was identified. Because the details of how the fair share funding allocation was determined are not presented, the Town has no basis to determine whether or not this percentage is appropriate. Additional detail should be provided as to how the fair share funding percentage was determined for this project with the opportunity for the Town of Truckee to provide further comment as to the adequacy of the methodology.

7-15

It is also unclear as to whether the fair share funding allocation would be applied to all existing Truckee to Tahoe City Routes or only the proposed two additional routes. Additional detail of how the need for the additional two routes were determined to mitigate transit impacts should also be provided with the opportunity for further review by the Town of Truckee.

Other Comments

It is noted that the project applicant will be required to pay the appropriate Placer County traffic impact fees for this project. Given the fact that 60 to 70 percent of project generated traffic is

7-16

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Letter to B. Combs, 6/10/99
Page 8

forecast to have origins and destinations within or through the Town of Truckee along the State Route 89 corridor, it would be appropriate to earmark a portion of those funds to the capital improvement projects identified along the State Route 89 corridor (SR 89/I-80 interchange, Mousehole, West River Street/SR 89 improvement). It would be appropriate to tie a fair share portion of those mitigation fees to the above reference projects as a part of the mitigations identified in the project EIR.

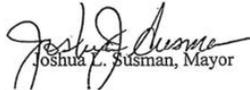
7-16
Cont

The Town also requests that the EIR be recirculated for review and comment if the traffic generation methodology or conclusions are modified through the final EIR process.

7-17

I hope these comments are of assistance in the preparation of the Final Environmental Impact Report. If you have any questions regarding these comments, please feel free to contact Tony Lashbrook at (530) 582-7876.

Sincerely,


Joshua L. Susman, Mayor

Cc Placer County Board of Supervisors
Nevada County Board of Supervisors
Nevada County Planning Department
Sierra Sun

L6

Town of Truckee
Joshua L. Susman, Mayor
July 15, 2015

L6-1

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.

L6-2

The County appreciates the Town of Truckee's concerns regarding project traffic and its effect on intersections and roadways in the town. The comment states that mitigation should include a reduction in average daily traffic (ADT) for both existing and new ADT associated with the project, and enhanced transit and transportation demand management (TDM) services. The comment addresses existing conditions, which serve as the baseline against which the project's impacts are evaluated. CEQA requires that mitigation be identified for the significant impacts of a project; there is no requirement to improve existing conditions. Nonetheless, mitigation proposed in the DEIR (Mitigation Measures 9-1a and 9-1b) would address both existing and project traffic, particularly associated with TDM. For instance, Mitigation Measure 9-1b includes a "real-time" information system that would inform most people using the resort of roadway conditions along Squaw Valley Road. The intent is to provide information that ultimately encourages people to stay at the resort and use its amenities rather than departing when roads are congested. A measure like this would not segregate existing from project users, rather it would be targeted to all people at the resort. Moreover, various measures are calibrated to a certain ADT threshold (13,500), at which point transportation demand management measures would come into effect. While these measures address traffic along roadway segments that are proximate to the resort, they would also reduce traffic on roads throughout the region during peak periods, including roads in Truckee. Other TDM measures, such as preferential parking for carpools, would also apply to both existing and project users.

The comment suggests that greater contributions (than fair share) be provided to transit services (i.e., shuttle, rideshare) that would accommodate both existing and new employees. As described on page 9-65 of the DEIR, the proposed project would include a transit center within the Village Area, which would serve both existing and project-related transit needs. The mitigation included in the DEIR (Mitigation Measure 9-7) requires fair share contributions to additional transit service when ridership approaches capacity. This is intended to address overall increases in ridership to ensure that adequate capacity is provided if the project "tips" capacity past the point where all users (existing and project) can be served. Expanded transit services would be available both to existing Squaw Valley travelers as well as future travelers. See also the portion of the traffic Master Response regarding transit service expansion.

With respect to current trips, it is important to recognize that the proposed project is intended to encourage people using the resort to stay there for extended periods of time. The proposed project traffic analysis overlays the VSVSP on top of existing conditions, but makes no assumptions with respect to whether existing traffic patterns will be altered by the project. In reality, it is expected that a proportion of existing day skiers, who may otherwise seek lodging outside Squaw Valley, would now stay in Squaw Valley for extended periods. In other instances, day skiers may adjust their departure times as they enjoy a wider range of amenities that encourage them to extend their day. None of these features of the project are accounted for in the traffic analysis, and therefore the peak hour impact analysis may in fact overstate the degree to which project traffic will affect local roadways.

The VSVSP would be developed in an area that is part of a regional transportation and circulation environment that includes the Town of Truckee, as well as eastern Placer County. To address the reality that development in unincorporated Placer County could affect traffic conditions within the Town of Truckee and that development planned in Truckee could, likewise, effect roadway conditions in surrounding areas of the county, the Town of Truckee and Placer County funded the Placer County/Truckee Joint Impact Fee Study in 2005. The *Placer County/Truckee Joint Traffic Impact Fee Study* (LSC 2005) analyzed a regional Traffic Impact Fee (TIF) program that includes projected land development and roadway infrastructure within both jurisdictions. According to page 25 of the report, the TIF is based on buildout of the Squaw Valley General Plan, the Alpine Meadows General Plan, and portions of the Truckee River corridor within Placer County, which the TIF estimated consisted of 260,000 square feet of commercial development and 6,100 total bedrooms, including permanent and seasonal residences and hotel-guest lodging. Information provided on page 41 of the report showed that the total fees flowing from new development in Truckee to pay for improvements in Placer County would be \$6.8 million, while the total fees flowing from new development in Placer County to pay for improvements in Truckee would be \$6.6 million. Because the flow of outbound and inbound monies to fund inter-jurisdictional improvements would be balanced, the two agencies determined that a transfer of monies would be inefficient and unnecessary. Furthermore, on April 3, 2007 the Placer County Board of Supervisors received a report from the County Director of Public Works finding equivalent traffic impacts between the Town and the County, and took action to adopt a Resolution authorizing the Director of Public Works to sign an Agreement between the Town and the County authorizing each jurisdiction to retain Traffic Impact Fees that would have otherwise been transmitted as cross jurisdictional impact fees (Placer County Department of Public Works 2007). An Agreement was subsequently authorized by the County Director of Public Works on June 15, 2007.

The proposed project would not result in exceedance of the land use assumptions in the TIF program applied to this geographic area. In addition, there has been a substantial reduction in assumed development in Martis Valley above what was used in the analysis, which should further reduce impact with the Town of Truckee. When considering these two factors, the assumptions in the Placer County/Truckee Joint Traffic Impact Fee Study are conservative and the conclusion remains valid.

L6-3

As indicated by the commenter, the assessment of cumulative impacts in the DEIR identified effects on transportation facilities in the Town of Truckee in Impact 18-21 (Cumulative impacts to Caltrans intersections). These include: the SR 89/I-80 westbound and eastbound ramps and the SR 89/Donner Pass Road intersection. The discussion of potential mitigation for this impact indicates that “there are no known fee programs collecting funds to implement” the concept of replacing the traffic signal at the SR 89/Donner Pass Road intersection with a multi-lane roundabout, as discussed in several planning documents (see page 18-24 of the DEIR). The comment notes that the SR 89/Donner Pass Road intersection is included in the Town’s traffic impact fee (TIF) program, and indicates that timely mechanisms to achieve acceptable LOS may, in fact, be available.

The comment is correct in that the 2007 fee program (Town of Truckee 2007) shows a two-lane roundabout at the SR 89/Donner Pass Road intersection with \$3.8 million in fees to come from new land development to help fund the improvement. However, the draft update to the TIF states that the two-lane roundabout at the SR 89/Donner Pass Road intersection is being removed from the TIF list because it is no longer necessary to provide adequate LOS (Town of Truckee 2016, Attachment A). The update to the Truckee Area Traffic Impact Fee Program was adopted on February 23, 2016 by the Town (Ordinance 2016-3). The adopted fee TIF does not include improvements to the SR 89/Donner Pass Road intersection. Nonetheless, as described in the response to comment L6-2, there is an agreement between

the Town and the County authorizing each jurisdiction to retain Traffic Impact Fees that would have otherwise been transmitted as cross jurisdictional impact fees. Therefore, there is not an obligation for TIFs collected from projects in Placer County to be used to fund improvements in the Town of Truckee, including any improvements at the SR 89/Donner Pass Road intersection.

The conclusions reached in the DEIR remain valid, as there are no known plans to improve the I-80/SR 89 interchange, no requirements for the VSVSP to contribute funds to such a project, and because any improvements would require approval from Caltrans, which Placer County cannot assure. These impacts are correctly characterized as significant and unavoidable. The potential that the traffic modelling used in this analysis is different from the methodology used by the Town of Truckee in its recent modeling efforts is noted. The comment provides no basis on which to infer that the modeling upon which the analysis of the VSVSP is based is inadequate. See also response to comment L6-4.

- L6-4 The comment requests a meeting with Placer County and Caltrans to discuss specific intersections and the identified impacts. Placer County staff met with Town of Truckee staff on October 20, 2015 to discuss this issue and other issues raised in the Town of Truckee comment letter. Placer County understands the Town of Truckee's concerns and has engaged the project applicant in discussions to identify mechanisms to address this issue and similar issues raised by the Town; however, as it relates to this EIR, the analysis addresses the significant effects and feasible mitigation. There are no known plans to improve the I-80/SR 89 interchange. Therefore Impact 18-21 (Cumulative Impacts to Caltrans Intersections) determined that there are no known fee programs to collect funds to construct capacity improvements to this intersection and the cumulative impact was determined to be significant and unavoidable.
- L6-5 The comment states that additional mitigation may be available to address the significant effects of project-generated traffic along the SR 89 corridor. Page 9-27 of the DEIR describes the planned improvements to the SR 89, as documented in the *SR 89 Transportation Corridor Concept Report* (Caltrans 2012). Widening of this facility is not considered feasible due to the environmental sensitivity of the area and topographic constraints (Caltrans 2012: 6). LOS calculations from the DEIR indicate that travel time increases on the SR 89 corridor would be relatively modest with the addition of project trips. During the Winter Saturday AM peak hour, inbound travel to the project from Truckee would experience an average 12 second increase in travel time. The reverse movement during the Winter Sunday PM peak hour would experience a 42 second increase in delay (based on data from Tables 9-21 and 9-23 in the DEIR assessing intersection delays and changes in average speed along roadway segments). The potential for the applicant to make equitable finance contributions to roadway improvements in the Town of Truckee is discussed in response to comments L6-2, LG-3, and L6-4. The current status of plans to improve the SR 89/Donner Pass Road intersection is discussed in response to comment L6-3. Also, see response to comment L6-2 regarding transportation demand management.
- L6-6 The comment states that additional reductions in traffic may also be realized by the development of greater amounts of employee housing in Olympic Valley. As described in the DEIR, the project includes construction of employee housing on the East Parcel to accommodate a maximum of 300 employees (replacement housing for 99 employees and new housing for 201 project generated employees). Further development of employee housing on applicant-controlled land in the Olympic Valley is not possible outside of the main Village area because no such land is available. Therefore, such a proposal would effectively reduce the land available for other planned uses presented in the VSVSP and modifying the proposed project. The result would be similar to the Reduced Density Alternative evaluated in

the DEIR (pages 17-24 through 17-31). See response to comment L6-7 for further discussion of the Reduced Density Alternative.

Providing 100 percent of employee housing on the project site to reduce impacts associated with traffic would require the project to provide double the amount of employee housing mandated by General Plan policy. Additional housing in proximity to the project would likely reduce traffic in the long term, but only that portion associated with employees who would otherwise commute from outside of Olympic Valley. Further, it is not reasonable to require that all employees reside within the Olympic Valley and it is anticipated that some may have a personal preference for lodging in other areas in the region.

The VSVSP Employee Workforce Housing Plan required by Mitigation Measure 5-3 will include specific commitments to employee housing, and should focus on how to fulfill demand regionally and in a manner that places employees in proximity to services. The County Planning Commission and Board of Supervisors will consider long-term employee housing needs in their deliberations over the project.

As stated on page 18-60 of the DEIR:

In addition to providing employee housing on the East Parcel, the project would employ other methods consistent with the County's employee housing policy to meet the County employee housing standards (see Chapter 5, "Population, Employment, and Housing"), possibly including provision of off-site employee housing (including outside of Olympic Valley), dedication of land for needed units, and/or payment of an in-lieu fee to the County. If the project applicant builds additional housing, or if in-lieu fees are used for additional housing, the construction would result in potential impacts, depending on where it is located. Additional traffic, air emissions, noise, and other resources could be affected as a result of this indirect population growth.

In addition, increasing the volume of employee housing is not the only mechanisms available to reduce employee vehicle trips. For example, Squaw Valley has instituted an employee shuttle from Reno; thereby reducing the number of vehicle trips generated by employees choosing to live in the Reno area.

L6-7

The comment states that reduced development alternatives would result in lower traffic impacts. The comment is correct, and several such alternatives were evaluated in the DEIR. For example, the Reduced Density Alternative and its potential effects as compared with the proposed project are described on pages 17-24 through 17-31 of the DEIR. Specifically, transportation and circulation impacts associated with this alternative are described on pages 17-28 through 17-29. As described therein,

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

The No Project—SVGPLUO Development Alternative (pages 17-18 through 17-24 of the DEIR) and the Preservation of Historical and Wetlands Resources Alternative (pages 17-35 through 17-41 of the DEIR) also provide for less development than the proposed project, resulting in reduced traffic impacts.

L6-8

The comment states that the developer should be required to fund enhanced transit services. Mitigation Measure 9-7 would provide this funding. Also refer to the Master

Response regarding traffic for a discussion of transit service expansion, as well as response to comment L6-2.

L6-9

The comment states that the construction traffic management plan should include Truckee roadways if an aggregate mine in the Town is used to supply the project. Typically, the traffic generated from a permitted use (aggregate mine) is addressed by the lead agency permitting that activity (in this case, the Town of Truckee). Mitigation Measure 9-8 in the DEIR requires the applicant to develop and implement a construction TMP. This mitigation measure describes the TMP contents and provides performance standards that must be achieved throughout construction. The TMP specifically mentions the need to document “approved truck circulation patterns.” Because of the uncertainty of specific construction activities, specific streets (other than Squaw Valley Road) were not mentioned in the plan. However, in response to this request, Mitigation Measure 9-8 on page 9-67 of the DEIR is revised as follows:

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

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

- ▲ guidance on the number and size of trucks per day entering and leaving the project site;
- ▲ identification of arrival/departure times that would minimize traffic impacts;
- ▲ approved truck circulation patterns, including coordination with the Town of Truckee if the aggregate mine in the Town is used as a material source;
- ▲ locations of staging areas;
- ▲ locations of employee parking and methods to encourage carpooling and use of alternative transportation;
- ▲ methods for partial/complete street closures (e.g., timing, signage, location and duration restrictions);
- ▲ criteria for use of flaggers and other traffic controls;
- ▲ preservation of safe and convenient passage for bicyclists and pedestrians through/around construction areas;
- ▲ monitoring for roadbed damage and timing for completing repairs;
- ▲ limitations on construction activity during peak/holiday weekends and special events;
- ▲ preservation of emergency vehicle access;
- ▲ coordinate with applicants of other projects under construction concurrently in Olympic Valley to minimize potential additive construction traffic disruptions, avoid duplicative efforts (e.g., multiple occurrences if similar signage), and maximize effectiveness of traffic mitigation measures (e.g., joint employee alternative transportation programs);
- ▲ removing traffic obstructions during emergency evacuation events; and

- ▲ providing a point of contact for Olympic Valley residents and guest to obtain construction information, have questions answered, and convey complaints.

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

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

L6-10 Regarding the commenter's suggestions to reduce ADT associated with employees who currently reside or will reside in Truckee, see response to comment L6-2.

L6-11 The comment suggests that specific housing strategies should be part of the VSVSP, and should include a broader range of housing types. This suggestion is addressed in Mitigation Measure 5-3, which requires an employee/workforce housing plan. While this mitigation measure does not require that employee housing needs are accommodated within the Olympic Valley, it meets Placer County General Plan Housing Element Policy C-2 requirements.

Regarding the comment about the potential for reduced traffic associated with a greater number of employees accommodated within the Olympic Valley, see response to comment L6-6.

L6-12 See responses to comments L1-2 and L6-6 regarding providing more housing in Olympic Valley.

L6-13 The comment states that mitigation measures related to employee housing are improperly deferred. This is not accurate. Not only is the mitigation not deferred, it describes the details of the various options available to satisfy its stated requirements. Mitigation proposed to reduce this impact is consistent with Policy C-2 in the County's General Plan that requires employee housing to be provided for in one of the following ways: construction of on-site employee housing; construction of off-site employee housing; dedication of land for needed units; and/or payment of an in-lieu fee.

Under the proposed project, development would occur over a period of approximately 25 years. The employee housing would be built at a rate that would accommodate employee generation. Mitigation Measure 5-3 requires the VSVSP Employee Workforce Housing Plan to be prepared at the time of the first recordation of the first Small Lot Final Map or approval of a building permit for any new-employee generating project that does not require a Small Lot Final Map, and it must be updated with each successive Small Lot Final Map.

Although this is a mitigation measure, Placer County acknowledges that its fulfillment may result in environmental impacts. The dilemma surrounding this issue is that this mitigation measure could be accommodated in existing housing, or could result in the construction of new housing. It is speculative at this time to analyze an outcome that is not currently known.

However, the growth inducing impact analysis, Section 18.4.2 of the DEIR discusses this issue. As described on page 18-60:

In addition to providing employee housing on the East Parcel, the project would employ other methods consistent with the County's employee housing policy to meet the County employee housing standards (see Chapter 5, "Population, Employment, and Housing"), possibly including provision of off-site employee housing (including outside of Olympic Valley), dedication of land for needed units, and/or payment of an in-lieu fee to the County. If the project applicant builds additional housing, or if in-lieu fees are used for additional housing, the construction would result in potential impacts, depending on where it is located. Additional traffic, air emissions, noise, and other resources could be affected as a result of this indirect population growth.

Because the location and type of program that would be developed (if a new housing is indeed developed) is not, and cannot currently be known, it is infeasible to provide further analysis. However, the cumulative impact discussion on pages 18-1 through 18-57 of the DEIR addresses a number of housing projects, and it is conceivable that one or more of these could be involved in the ultimate satisfaction of Mitigation Measure 5-3. The reader is referred to this analysis for consideration of the types of potential impacts that could result.

See also response to comment 05-2.

L6-14

Water supply—including water providers, water sources, existing water use, water demand, status of the groundwater basin, and existing water supply infrastructure—is discussed on pages 14-2 through 14-7 of the DEIR. Impact 14-1 describes the project's demands for potable and irrigation water, which would be potentially significant. Appendix C to the DEIR contains the WSA completed for the project, further detailing the project's water demands. Implementation of Mitigation Measures 14-1a, 14-1b, and 14-1c would reduce the impact to a less-than-significant level.

See the Master Response regarding water supply for a discussion of the use of water from the Martis Valley groundwater basin, which is not part of the project proposal nor needed to supply water to the project.