3 RESPONSES TO COMMENTS ON THE DRAFT EIR

This chapter contains comment letters received during the public review period for the DEIR, which concluded on July 17, 2015, including transcribed comments received during the June 25, 2015 public hearing. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the DEIR.

Table 1-1 in Chapter 1, "Introduction," presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

A public hearing to receive comments on the DEIR was held on June 25, 2015. The hearing was held during the regular meeting of the Placer County Planning Commission at 10:05 a.m. The hearing was recorded and a transcript was prepared.

The verbal and written individual comments received on the DEIR and the responses to those comments are provided in Section 3.2, "Responses to Comments." The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

3.1 MASTER RESPONSES

Several comments raised similar issues. Rather than responding individually, master responses have been developed address the comments comprehensively. Master Response topics, the section of this chapter where the response is located, and a summary of key issue areas addressed by the response are provided in Table 3-0. A reference to the master response is provided, where relevant, in responses to the individual comment.

Table 3-0 Summary of Master Responses

Master Response Topic	Section	Key Areas Addressed
Water Supply	3,1,1	Water Supply Assessment and sufficiency of water supply, DEIR/2014 Water Supply Assessment, 2015 Water Supply Assessment Update, historic water use, water demand, sufficiency of supply, additional analysis of Water Supply Assessment Update simulation results, effects on well saturation thickness, effects of groundwater pumping on biological resources, creek restoration benefits, occupancy rate sensitivity analysis model scenarios, other water-related issues, impacts on the Truckee River
Traffic	3.1.2	Study of traffic conditions on Interstate 80, Specific Plan Policy CP-1, Emergency Access/Wildland Fire Evacuation Plan, adequacy of parking supply, paid parking, consideration of construction impacts, Fanny Bridge Revitalization Project, added vehicle travel in the Tahoe Basis, transit service expansion, effectiveness of Mitigation Measure 9-1a (Traffic Management on Squaw Valley Road), use of 2011-2012 ski season data to represent existing winter conditions
Traffic Issues at Squaw Valley Road and Squaw Peak Road	3.1.3	Safety and traffic congestion
Visual Impact Analysis	3.1.4	Viewer groups, building height and density, impacts to scenic vistas and change in character, night sky views/light pollution, analysis of shadowing
Noise	3.1.5	Construction noise (in surrounding areas, construction period, construction hours, nighttime activities, analysis scope and mitigation),operational noise (stationary, traffic)

Table 3-0 Summary of Master Responses

Master Response Topic	Section	Key Areas Addressed
Construction Emissions	3.1.6	Inclusion of infrastructure in air quality and greenhouse gas modeling, use of appropriate air quality and greenhouse gas emissions model, over-estimation of maximum annual development in commenter's model run
25-Year Construction Period	3.1.7	Project phasing and buildout projections, DEIR conclusions regarding construction noise, DEIR conclusions regarding construction traffic, property value impacts
Significant and Unavoidable Impacts	3.1.8	CEQA context; temporary, periodic, and ongoing significant and unavoidable impacts; Placer County General Plan Policy 1.G.1
Reduced Density Alternative	3.1.9	Adequacy of CEQA analysis, analysis of the Reduced Density Alternative, feasibility of the Reduced Density Alternative
Cumulative Analysis	3.1.10	CEQA context, base-to-base gondola project, Alpine Sierra Project, White Wolf Project, Stanford Chalet
Occupancy Assumptions	3.1.11	CEQA requirements, evaluation of a worst-case scenario, evidence supporting occupancy data used in the DEIR
Mountain Adventure Camp	3.1.12	Compatibility with surrounding uses and the Olympic Valley, size, traffic, water use, water quality, alternatives
East Parcel	3.1.13	Proposed changes to the East Parcel, land use compatibility, noise, visual resources, air quality
Mountain Maintenance Facility	3.1.14	Potential land use conflicts, visual resources, air quality, noise, propane storage, accidental release of hazardous materials, interference with aquifer recharge
TRPA Thresholds	3.1.15	Jurisdiction, CEQA requirements
Squaw Valley General Plan and Land Use Ordinance	3.1.16	Background; approval of general plan amendment, project area rezoning, and development standards; policy amendments, planned unit development
Greenhouse Gas Analysis	3.1.17	CEQA context, applicability recent California Supreme Court case, additional mitigation consideration
Recirculation	3.1.18	Statutory and case law, analysis of need to recirculate

3.1.1 Master Response: Water Supply

INTRODUCTION

This Master Response addresses comments on the DEIR analysis of water supply, the WSA, and the DEIR analysis of the impacts of groundwater pumping on biological resources. A number of comments received on the DEIR question aspects of the 2014 Water Supply Assessment (WSA) used in the analysis regarding the availability of water supply, and/or the assumptions for the 2014 WSA. The WSA was updated in July 2015, after publication of the DEIR, and that update addressed some of these concerns. The 2015 WSA update is provided in Appendix A of this FEIR. An overview of the 2014 WSA and DEIR analysis of water supply sufficiency is provided below, followed by an explanation of the differences between the 2014 and 2015 WSAs. The effects of groundwater pumping on biological resources using the assumptions of the 2015 WSA update are also addressed.

Briefly, this Master Response addresses the following issues.

Data from recent years. A number of comments noted that the modeling performed as part of the WSA did not include data from the recent drought; the 2015 WSA update incorporated data from 2012 through 2014, which includes several of the recent drought years (2015 data are not yet available because the 2015 water year did not end until September 30, 2015, after the July 2015 WSA update was prepared).

Redundant water supply. A redundant water supply source outside of Olympic Valley is not part of the VSVSP (i.e., project) and is not evaluated in this Master Response. As identified in the 2014 WSA and 2015 WSA

update, and supported by further information below, there would be adequate water to serve the VSVSP and cumulative development in Olympic Valley through 2040 (i.e., general estimated year for full project build-out). Therefore, there is no need to identify and analyze potential additional sources of water.

The Squaw Valley Public Service District (SVPSD) is studying the feasibility of obtaining a redundant source of water for Olympic Valley "to allow for reliable quantity and quality that is geographically diverse from the aquifer currently used as the primary source of potable water, and to provide redundancy for improved emergency preparedness" (Farr West Engineering 2015a: ES-1). As stated in the SVPSD's feasibility analysis (Farr West Engineering 2015a: ES-3),

> [t]he need for a redundant water supply has long been established as a primary goal in the District's Strategic Plan. The need has been defined in a number of studies prepared on behalf of the District. The redundant water supply will provide the necessary reliability and flexibility to the water system in case of emergency, drought, etc., diversifying the water supply source to allow for necessary system redundancy in the case of declining groundwater levels and/or groundwater contamination in the Olympic Valley Aquifer.

In connection with this effort, the SVPSD is studying various pipeline routes from Martis Valley, among other options, to secure a redundant source of water. According to the SVPSD's General Manager, a redundant supply is being sought regardless of whether or not the VSVSP project is constructed (Geary, pers. comm., 2015). The SVPSD currently has a single source of water, groundwater from the alluvial groundwater basin aquifer and to a limited extent from fractured bedrock wells above the Valley floor. The SVPSD states that it is seeking a redundant source primarily as a means of improving water security. Very few water systems rely on a single source of water, and the SVPSD seeks geographic diversity for its water supply system. The SVPSD has to plan for not only expected conditions, but potential catastrophic conditions. A hypothetical example could be if the Tahoe City Public Utility District (TCPUD) had a contaminated water source in part of its system and as a result, the SVPSD was asked to supply additional water to the TCPUD. If contamination or some other unforeseen event occurs in the Olympic Valley, the SVPSD would need a secondary source of water to supply its customers in Olympic Valley. Further, full buildout of the Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) beyond 2040 would bring more development and population into the Valley than projected in the WSA. While this may occur over a period longer than 25 years, the SVPSD needs to plan to supply all of its future needs. Again, this is outside of the needs and reliability of the system evaluated in the WSA (Geary, pers. comm., 2015).

The SVPSD began investigating a redundant source of supply in 2009, before and separate from the submittal of the application for the VSVSP to the County. The redundant supply is meant to provide water under emergency circumstances, not normal conditions, and would be needed regardless of whether the project is approved. Therefore, the redundant source is not evaluated in the DEIR or referenced further in this Master Response.

Assumptions regarding number of wells installed. Some comments on the DEIR pointed out that its analyses are based on the 2014 WSA assumption that nine wells would be installed, even though the WSA acknowledges that as few as six new wells may be adequate to serve the proposed project and cumulative growth. In order to ensure that the assumptions in the DEIR account for the possibility that as few as six new wells will be installed, a six-well pumping scenario was analyzed, and the results are presented in this Master Response.

Occupancy rates. Some comments suggested that the occupancy rate assumptions used in the 2014 WSA were too low. These comments stated that if occupancy rates will be higher than those assumed in the 2014 WSA, water demand estimates are too low. See the Master Response regarding occupancy assumptions for an explanation of why the rates used in the DEIR are considered valid and appropriate. At the time the 2015 WSA update was prepared, additional data were available about historic occupancy of existing lodging. Based on this data, occupancy rates were adjusted upward slightly. This adjustment resulted in average occupancy rates that are slightly higher than those set forth in the 2014 WSA. An analysis was prepared separate from the 2015 WSA update that was identical to the 2015 WSA, except that the occupancy rates

were increased by an additional 5 percent. This increase in occupancy rates is not expected to occur. The analysis was prepared, however, in order to determine whether such an increase would alter the 2015 WSA update's conclusions regarding the adequacy of available water supplies. The analysis, summarized below, provides another layer of assurance that there would be adequate groundwater supply, and responds to comments on this issue.

As discussed in more detail below, additional technical analyses were conducted to support the discussion of the above issues. The analysis has been updated to include: using data from 2012 through 2014 drought years; installing either six or nine new wells; and assuming occupancy rates exceed the well-documented rates used in the 2014 and 2015 WSAs. Other water-related issues addressed in this Master Response include potential effects of use of groundwater in the Olympic Valley on conditions in the Truckee River; potential effects on groundwater conditions from irrigating landscaping in the VSVSP area, irrigating habitat restoration areas, and irrigating natural vegetation that may be affected by lowered groundwater levels; and potential effects of climate change on water supply and groundwater conditions.

The analyses demonstrate that there is adequate groundwater to serve the proposed project and cumulative growth. The technical analyses also demonstrate that the effects on wildlife and vegetation would not be substantially more severe under 2015 WSA assumptions.

WATER SUPPLY ASSESSMENT AND SUFFICIENCY OF WATER SUPPLY

The 2014 WSA is found in Appendix C of the DEIR. The 2015 WSA update is found in Appendix A of this FEIR.

DEIR/2014 WATER SUPPLY ASSESSMENT

The DEIR analyzed the adequacy of water supply to serve the proposed project in Chapter 14, "Public Services and Utilities." As discussed on page 14-29, the analysis is derived from the 2014 WSA (Farr West Engineering et al. 2014). The 2014 WSA evaluated the sufficiency of groundwater supply to serve project and cumulative demand using the SVPSD's groundwater model (Model). As described in the 2014 WSA (Section 6) and the DEIR under Impact 13-4, the MODFLOW numerical model was developed for the SVPSD in 2001 to simulate groundwater conditions. The Model has been updated over the years and calibrated to existing observed conditions. It has been used as a tool for managing groundwater supply, planning for future growth, and evaluating potential water supply sources for various developments in Olympic Valley.

For the 2014 WSA, the Model was used to simulate future conditions and predict how groundwater pumping could affect water levels and availability in the Olympic Valley Groundwater Basin (Basin) (page 6-2 of the 2014 WSA in Appendix C of the DEIR).

For the 2014 WSA, the Model was modified to incorporate recent groundwater elevation, pumping, and hydrology data and updated information relating to Squaw Creek (e.g., streamflow and stream bed conductance). The Model was recalibrated following these updates. Calibration of a numerical groundwater flow model refers to a demonstration that the model is capable of simulating groundwater elevations (heads) that closely match measured (or observed) groundwater elevations from existing wells within the model area. The Model showed good calibration for existing conditions for May 1992 through December 2011. The calibrated Model used actual historical monthly pumping to simulate groundwater elevations on a monthly time step.

The calibrated Model was used to simulate baseline and future conditions for the 2014 WSA and DEIR. These future simulations used a version of the Model with a monthly time step from January 1993 through December 2011. The baseline version of the Model used historical average monthly pumping applied to every year of the Model period to simulate groundwater elevations during each of the months from January 1993 through December 2011. This simulation provided a baseline that could be used to assess the effects of increased pumping to serve the proposed project and other cumulative growth. The baseline time period is the same for the entire groundwater basin and includes average, wet, and single and multiple year dry

periods. This baseline period is consistent with the standard of practice in assessing hydrologic and hydrogeologic conditions and with the California Water Code requirements for WSAs [See Wat. Code Section 10910, subd. (f)(v), (vii)]. The comparison of groundwater elevations in baseline periods to those in future simulated conditions is a standard technique for assessing the effects of any proposed change to a groundwater system. [See *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 336-347; *O.W.L. Foundation, et al. v. City of Rohnert Park, et al.* (2008) 168 Cal.App.4th 568, 574 (reasoning that Water Code section 10910, subdivision (f)(5), "does not specify a particular methodology for a sufficiency analysis" and therefore "affords substantial discretion to the water supplier and its experts to select a methodology appropriate for assessing groundwater sufficiency for a proposed project").]

The 2014 WSA calculated existing water demands based on records of historical water use from 2000 through 2012 for the four primary water producers in Olympic Valley—the SVPSD, the Squaw Valley Mutual Water Company (SVMWC), the Resort at Squaw Creek, and Squaw Valley Resort. The annual average water demand for existing uses was calculated to be 842 acre-feet per year (AFY). Average monthly water demand was also calculated using the same historical information (see page 4-1 and Table 6-2 of the 2014 WSA in Appendix C of the DEIR).

Future water demand was calculated for the proposed project based on the project components (e.g., number of units, commercial square footage, employee housing, projected monthly occupancy rates) and reasonably foreseeable non-project-related development (i.e., cumulative development) through 2040, approximately 25 years into the future. State law requires a WSA to determine whether total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses [Wat. Code, Section 10910, subds. (c)(3), (c)(4)]. The 2014 WSA and 2015 WSA update satisfy these requirements plus extend the evaluation period an additional 5-years into the future.

The DEIR used conservative assumptions when calculating future anticipated demand, including:

- high per-unit water demand values for future development based on historic per-unit values, rather than adjusting for more efficient water conserving fixtures required by current building code and which would be used with the project;
- no reductions in future demand to account for State-, County-, and SVPSD-implemented water demand reduction measures; and
- no assumed reduction in water demands during drought.

The resulting annual average demand for the 2014 WSA was estimated to be 1,205 AFY for existing plus proposed project and non-project cumulative development under an estimated build-out horizon of 2040.

The 2014 WSA considers two sources of water supply: groundwater from the alluvial Olympic Valley Groundwater Basin (Basin) and groundwater from horizontal fractured bedrock wells in the mountain areas above the valley floor. The primary source is the Basin, supplying on average over 90 percent of the existing water demand (2014 WSA, Table 5-1, in Appendix C of the DEIR). The Model was used to simulate future conditions in the Basin assuming that a net total of nine new wells would be installed (some replacement wells would also be installed) and used to meet the projected demand. The analysis of the volume of groundwater that could be produced within the Basin in future years was based on the following Model inputs (page 6-1 of the 2014 WSA in Appendix C of the DEIR):

- volume and timing of recharge (i.e., precipitation and snowmelt);
- timing of demand (which varies by month; with higher demand in summer months, because of the need for irrigation);

- location of pumping wells (shown on Figure 6-1 of the 2014 WSA); and
- acceptable groundwater elevation response to pumping for long-term sustainability in the Basin.

The criterion used to assess whether there would be adequate water to supply new development was:

- average saturated thickness in the western municipal wellfield wells (existing and proposed new wells) may not fall below 65 percent for more than 3 consecutive months or more than 4 times total over the Model simulation period (2015 WSA update page 6-5, 2014 WSA page 6-5, DEIR page 14-33).

Saturated thickness is the groundwater level elevation in a well minus the elevation of the bottom of the Basin at that location. Maximum saturated thickness occurs when water levels are highest (page 6-5 of the 2014 WSA in Appendix C of the DEIR). Saturated thickness was calculated for each month in the future simulation Model time period (January 1993 through December 2011). The results showed that the average percent saturation for all wells in the wellfield ranged from 80 to 98 percent. The lowest groundwater elevations occurred during the fall in drought years, but the levels were still well above the 65 percent threshold. Based on this analysis, the 2014 WSA concluded that there would be sufficient groundwater available to serve existing users, the proposed project, and cumulative development through 2040 in normal, dry and multiple dry years (pages 8-1 and 8-2 of the 2014 WSA in Appendix C of the DEIR).

2015 WATER SUPPLY ASSESSMENT UPDATE

The WSA was updated in July 2015 by the same technical team that prepared the 2014 WSA for the SVPSD. The 2015 WSA update presents a revised analysis and documentation to reflect more recent data. Even with the revisions, including data from three consecutive drought years, the 2015 WSA update concludes that there would be sufficient water supply to serve existing users, the proposed project and non-project cumulative growth through 2040 in normal, dry and multiple dry years.

A number of assumptions and data used in the 2014 and 2015 WSAs were the same or essentially the same, including:

- a 25-year analysis period (2015-2040),
- a net increase of nine wells,
- conservative assumptions that no future reductions in demand would occur because of drought and/or regulations,
- the same criterion of 65 percent for average saturated thickness, and
- the same four factors for assessing groundwater production capacity described above (with adjustments to the calculations for some of these factors as discussed below).

The differences between the 2014 WSA and the 2015 WSA update are discussed below.

HISTORIC WATER USE

The 2015 WSA update reflects use of an enhanced groundwater model, which includes additional data and extended time period through January 2015, including the recent drought years of 2012 through 2014. This update included processing and incorporation of groundwater elevation, streamflow, and climate data available through January 2015. In addition, the methodology for calculating recharge from precipitation was modified to account for limited infiltration during summer storm events, effectively reducing summer month infiltration and improving model calibration. The updated WSA model was assessed by the WSA authors and found to adequately simulate groundwater elevations for the period from May 1992 through January 2015.

In addition, the 2015 WSA update presented and assessed conditions on a Water Year basis instead of by calendar year. A Water Year is a 12-month period starting October 1 and ending September 30.

The differences between the 2014 and 2015 WSA Model simulation periods and results for historic water demand are summarized in Table 3-1.

Table 3-1 Comparison of 2014 WSA and 2015 WSA Update: Historic Demand

	2014 WSA	2015 WSA Update	Difference
Simulation Period	Jan 1993-Dec 2011 (228 months)	October 1992-Jan 2015 (268 months)	+40 months
Historic Annual Average Demand (WSA Table 4-1)[1]	842 AFY	871 AFY	+29 AFY (3.4%)

[1] The increases in historic water demand between the 2014 and 2015 WSAs is the result of higher SVPSD, SVMWC, and snowmaking water use in 2012 through 2014 as compared to average use between 2000 and 2012.

Source: 2014 WSA and 2015 WSA Update

The updated water demand continues to exclude increased water use efficiencies expected to occur from various sources, including factors such as recent water line replacements implemented by the Squaw Valley Mutual Water Company that appear to have contributed to a decrease in groundwater pumping needed to serve their system.

WATER DEMAND

The average monthly water demand calculations were revised to include minor changes to the proposed project assumptions, and more recent occupancy data for existing facilities, specifically the Village at Squaw Valley USA occupancy data for fiscal years 2008 through 2014. This longer period for occupancy rate information shows very similar annual occupancy rates to those used in the DEIR. The additional occupancy rate information was used in the estimation of demands for the 2015 WSA update. See, also, the Master Response regarding occupancy assumptions. The future population calculations were affected, because the VSVSP and other cumulative future growth are factored into those rates. In addition, future snowmaking demand estimates were increased to reflect more recent water use data and potential future increases in snowmaking water use (which is not part of the project, but is additive to cumulative demand). These changes resulted in an increase in estimated 2040 cumulative demand, from 1,205 AFY in the 2014 WSA to 1,254 AFY in the 2015 WSA, an increase of 49 AFY (approximately 4 percent) in future water demand as compared to the 2014 WSA.

The specific differences water demand information shown in Table 3-2 stem primarily from the following factors:

- the addition of data from 2012 through 2014 resulted in adjustments to the calculations of monthly averages for historical pumping for the all pumpers (i.e., SVPSD, SVMWC, Resort at Squaw Creek);
- the addition of more recent data on historic occupancy rates slightly increased occupancy assumptions (see the Master Response regarding occupancy assumptions) and related assumptions regarding water demand for lodging and commercial uses; and
- an increase in the water demand for expected increased snowmaking (based on additional data from 2012-2014) contributed to the overall increase in water demand.

Table 3-2 Comparison of 2014 WSA and 2015 WSA Update: Water Demand

	2014 WSA	2015 WSA Update	Difference
VSVSP Program (WSA Table 2-1)			
Existing Commercial SF to be removed	77,650 sf	91,522 sf	+13,872 sf
Max bedrooms	1,757br	1,643br	-114br[1]
Max units (includes employee housing)	871 du	900 du	+29du[2]
Max commercial	297,734 sf	297,733 sf	-1sf
Population	1,307	1,389	+82
Occupancy Rates (WSA Table 3-2)			
Average Annual Occupancy (Managed units and employee housing)	55.2%	56.3%	+1.1%
Average Annual Occupancy (Unmanaged units and employee housing)	27.6%	28.2%	+.0.6%
Water Demand Changes (WSA Table 4-2)			
VSVSP	234 AFY	240 AFY	+6 AFY
Snowmaking	71 AFY	89 AFY	+18 AFY
Total Olympic Valley Population (Table 3-2)			
2040 Population	2,372	2,470	+98
Future Water Demand by Water Provider (WSA Table 4-2)			
SVPSD	777 AFY	786 AFY	+9 AFY
SVMWC	142 AFY	140 AFY	-2 AFY
RSC	214 AFY	240 AFY	+26 AFY
SVR (Snowmaking)	71 AFY	89 AFY	+18 AFY
Total Future Water Demand[3]	1,205 AFY	1,254 AFY	+49 AFY

Notes: 1. This reflects a difference only in how rooms are counted in the employee housing facilities. It does not reflect a change in capacity (number of employees) housed; this has remained at capacity for a maximum of 300 employees.

2. The increase in units and bedrooms was due to a change in the configuration of employee housing. However, the WSA calculated water demand for employee housing is based on the total number of employees being housed (a maximum of 300), rather than the unit or bedroom count; therefore, this change did not affect the water demand.

3. Minor differences because of rounding.

Source: 2014 WSA and 2015 WSA Update

Other minor changes include the following:

- Table 3-1, Climate Data, has been updated to correct the High Mountain Precipitation Data (which was not used in the Model, so does not affect the groundwater analyses) and to incorporate the data from 2012 through 2014 (see below for more discussion). For the Olympic Valley, the annual average precipitation remains unchanged at 47 inches per year, even with the addition of three additional years of precipitation records. Average monthly precipitation for the valley is also unchanged for nine months, with three months showing changes of one inch as compared to the previously reported averages.

- The addition of years 2012 through 2014 increased the assumption for unbilled water demand from 9.8 percent to 11.1 percent (see Tables 4, 8, 10, and 11 of Appendix A of the 2014 WSA and 2015 WSA update), which resulted in slight increases in estimated demand for VSVSP and cumulative residential and commercial growth.

- An increase of 756 gallons per day for the Mountain Adventure Center (MAC) water demand calculations to include water needed for the backwash system and deck washdown (MacKay & Somps 2015a).

- The contribution of horizontal wells used by the SVPSD and SVMWC was reduced from 70 AFY to 68 AFY.

- As noted above, the 2015 WSA update uses a Water Year basis, rather than calendar year, for assessing future groundwater conditions.

SUFFICIENCY OF SUPPLY

The 2015 WSA update concludes, like the 2014 WSA, that the groundwater supply would be adequate to meet 2040 water demand because the average saturated thickness for the wellfield would continue to be above 65 percent during normal, dry, and multiple dry years. As shown in Table 3-3, there would be a reduction in the range of saturated thickness, but levels would still be well above the threshold. The year with the lowest saturation rate was 2001 in both the 2014 WSA (with a low of 80 percent) and 2015 WSA update (with a low of 77 percent). The year with highest average saturation rate was 1993 in both the 2014 WSA (with a high of 98 percent) and in the 2015 WSA update (with a high of 99 percent).

Table 3-3 Comparison of 2014 WSA and 2015 WSA Update: Sufficiency of Supply

	2014 WSA	2015 WSA Update	Difference
Average % saturation for all wells in all years (WSA page 6-7)	80 to 98%	77 to 99%	-3 to +1

Note: The criterion for sufficiency is 65% average saturation.

Source: 2014 WSA and 2015 WSA Update

ADDITIONAL ANALYSIS OF WATER SUPPLY ASSESSMENT UPDATE MODEL SIMULATION RESULTS

Following the completion of the 2015 WSA update, the model simulated results were used to repeat the additional hydrology and biological analyses that were completed for the DEIR. This additional analysis used the 2015 WSA update version of the Model with the same assumptions used for the analysis shown in the DEIR. These simulations applied the modified demand estimates from the 2015 WSA update to assess groundwater conditions resulting from cumulative future water demands (i.e., existing, project, and non-project future demand), Project Only future water demands, and non-project only future water demands. These simulated scenarios were compared to updated baseline model simulations prepared using the 2015 WSA update version of the model and historical average water demands.

As discussed above, the 2015 WSA update assumed slightly higher water demand than the 2014 WSA because of changes in the project and occupancy rate assumptions and the addition of data from the years 2012 through 2014. It would be expected that the increase in groundwater pumping needed to meet the increased demand would have some level of effect on groundwater elevations. If the result was a sufficient reduction in groundwater elevations, this could in turn result in impacts on Squaw Creek and the meadow east of the VSVSP. Specifically, lowered groundwater elevations could affect the amount of water in the creek, particularly in refugia pools (used by fish as refuges when there is little or no stream flow) and the viability of vegetation in proximity to the creek. These effects are discussed in the DEIR primarily in Impact 6-1 (pages 6-40 through 6-46 of the DEIR), Impact 6-8 (pages 6-66 through 6-69 of the DEIR), Impact 6-13 (pages 6-78 and 6-79 of the DEIR), and Impact 13-5 (pages 13-65 through 13-74 of the DEIR).

As identified previously, the analysis in the DEIR is based on the 2014 WSA and groundwater modelling supported by the 2014 WSA data. The groundwater modelling results have now been updated to reflect the 2015 WSA update, as discussed below. The analysis is provided in a technical memo, *Revised Model Simulation Results in Support of Responses to Draft EIR Comments Village at Squaw Valley Specific Plan* (Todd Groundwater 2015a, provided in Appendix B of this FEIR).

The DEIR and WSAs recognize that differences between planned and actual wellfield construction and operations could result in differences in groundwater production. Some comments on the DEIR expressed concern that while the 2014 WSA and DEIR analyzed model simulations using nine new wells, both documents acknowledged that cumulative water demands could potentially be met with a minimum of six

new wells. The WSAs analyzed nine-well scenarios because it was expected that with more wells, saturation rates could be lower with some wells, primarily because some of those wells would be located in less productive portions of the aquifer. By placing modelled wells in less productive portions of the aquifer, the modelling would be more likely to show if well saturation levels would fall below the identified threshold. Also, the nine-well scenarios allow for more options and flexibility in groundwater management, a condition expected to be desirable for the water providers. However, in order to respond to comments requesting evaluation of a six-well scenario, a set of model simulations using only six new wells was developed and analyzed. The results are summarized below.

EFFECTS ON WELL SATURATION THICKNESS

The effects of the 2015 WSA - 9 New Wells scenario related to well saturation thickness and sufficiency of supply are described above in the subsection titled "Sufficiency of Supply." The six new well model scenario results were also assessed against the sufficiency of supply criteria used in the 2014 WSA and 2015 WSA update (see Appendix B). This assessment showed that the 65 percent saturated thickness criteria is met with six new wells pumping to meet cumulative water demands (i.e., 2040 with project and non-project growth). The six-well simulation showed a higher percentage of saturated thickness compared to the nine-well simulation, because the six wells were located in thicker and more productive areas of the aquifer. Thus, using the 65 percent saturated thickness criteria, groundwater pumping under the six-well simulation would not result in significant impacts to groundwater supplies.

EFFECTS OF GROUNDWATER PUMPING ON BIOLOGICAL RESOURCES

Refugia Pool Drying

DEIR Summary: As discussed in Impacts 6-1, 6-13, 13-4, and 13-5, groundwater withdrawals could lead to lower groundwater elevations, particularly in dryer months, when there is little or no surface flow in Squaw Creek. During these periods, if groundwater elevations drop enough, fish in Squaw Creek could be adversely affected. The DEIR states that such impacts on fish would be geographically localized within the meadow reach of Squaw Creek near the well field (page 6-79 of the DEIR). An analysis conducted by GANDA concluded that this effect would be confined to the western portion of the meadow, where the creek is closest to the modelled well field (see pages 13-65 through 13-73 and Table 13-13 in the DEIR). For three cells within the meadow (Eastern Cells A, B, and C) lowering groundwater elevations could increase the "drying" of refugia pools relative to baseline conditions. East of Cell C, groundwater elevations did not change enough to result in this drying effect. However, the DEIR also concluded that a different well-field configuration or pumping regimen could have different effects on pool drying. Mitigation Measures 13-4 and 6-1 would lessen the impact by requiring that any well field configuration that differs from the 2014 WSA must demonstrate that it would not substantially increase refugia pool drying and that vegetation in the upper meadow be monitored and remedial steps be taken if there is a loss of vegetation as the result of groundwater pumping.

2015 WSA - 9 New Wells: The refugia pool analysis was replicated using results from the 2015 WSA update version of the Model. The same parameters were used as in the analysis included in the DEIR. The number of modelled years was increased in this updated analysis, due to the addition of 2012-2014 data in the 2015 WSA update; whereas the DEIR analysis was based on the 2014 WSA, which included data through 2011 only.

The updated analyses showed similar results to those included in Table 13-13 of the DEIR. The increased demands and updated Model continued to indicate that the potential for increased pool drying is limited to the western portion of the meadow, represented by East Cells A, B, and C. As shown in Table 2 of the Todd Groundwater memo (Appendix B of this FEIR), and summarized in Table 3-4, for the period analyzed in the DEIR (1993 through 2011), the 2015 WSA - 9 New Wells scenario results in one additional month of pool drying (as defined by GANDA) in each of the three cells compared to the 2014 WSA scenario results described in the DEIR. In East Cells A and B, the new month of drying would occur during a year where drying

was not identified in the DEIR (Model year 2006); therefore, an extra year with drying in these cells is identified. The extra month of pool drying in East Cell C occurs during a year where drying had already been identified in the DEIR (increasing from 3 months of drying to 4 months in the 2001 Model year); therefore, an additional year of drying is not added. Increases in the percentages of total months showing drying for all three cells is 0.4 percent (i.e., the percentage of total months with drying in East Cell A increases from 13.6 percent using the DEIR data to 14 percent under the 2015 WSA - 9 New Wells scenario).

Table 3-4 Summary Comparison of 2014 and 2015 Pool Drying Data

	East Cell A			East Cell B			East Cell C		
	Draft EIR Results	2015 WSA-9 New Wells	2015 WSA-6 New Wells	Draft EIR Results	2015 WSA-9 New Wells	2015 WSA-6 New Wells	Draft EIR Results	2015 WSA-9 New Wells	2015 WSA-6 New Wells
Total Dry Pool Months 1993 through 2011	31	32	37	21	22	28	5	6	7
Percentage of Months with Dry Pools 1993 through 2011	13.6%	14%	16.2%	9.2%	9.6%	12.3%	2.2%	2.6%	3%
Years with Dry Pools 1993 through 2011	13	14	16	10	11	12	2	2	3
Total Dry Pool Months 1992 through 2014	NA	34	40	NA	22	30	NA	6	7
Percentage of Months with Dry Pools 1992 through 2014	NA	12.7%	15%	NA	8.2%	11.2%	NA	2.2%	2.6%
Years with Dry Pools 1992 through 2014	NA	16	19	NA	11	14	NA	2	3

Source: Todd Groundwater 2015a

The 2015 WSA update analyzed an additional three years (2012 through 2014). Years 2012 and 2013 are each shown to have a single month of pool drying in Cell A (Table 3-4 [Table 2 in Appendix A]). No pool drying is predicted for 2014 for Cell A, and no pool drying is predicted for years 2012, 2013 and 2014 for Cells B and C. The addition of the 2012 through 2014 data results in a decrease in the percentages of total months showing pool drying for all three cells (Table 3-4), with the percentages falling below those associated with the DEIR data. For example, in East Cell A, using the 1993 through 2011 data, 14 percent of the months show pool drying under the 2015 WSA - 9 New Wells scenario. With the addition of the 2012 through 2014 data, the percentage of months with drying is reduced to 12.7 percent, which is below the 13.6 percent resulting from the data used in the DEIR. These reductions occur even though the added years reflect below normal precipitation. This is indicative of the fact that for the Squaw Valley basin, factors beyond just precipitation amount, such as type and timing of precipitation, are important in determining groundwater and surface water conditions.

These results indicate that the increases in water demand and other changes analyzed in the 2015 WSA update would not substantially increase the incidence of pool drying in Squaw Creek relative to those identified in the DEIR. The small increase in the number of months with pool drying, and the decrease in the percentages of months with pool drying with the addition of the 2012 through 2014 data, indicate that the updated modelling conducted for the 2015 WSA - 9 New Wells scenario does not change the impact conclusions or effectiveness of mitigation in the DEIR for impacts related to drying of Squaw Creek refugia pools.

2015 WSA - 6 New Wells: The 2015 WSA - 6 New Well scenario simulation used the same demands as the 2015 WSA - 9 New Well simulation, except that a net increase of only six new wells were included in the simulation, which is the minimum number of new wells estimated to be needed to serve cumulative buildout conditions, as indicated by the 2014 and 2015 WSAs. The six new well locations were selected to take advantage of the best hydrogeologic conditions and fewest obstacles to well construction and operation. The new well locations are shown in Figure 2 of the Todd Groundwater memo (Appendix B), and include a well on the PlumpJack property, because redevelopment of that property is currently under review (a Notice of Preparation for an EIR was released in June 2015), and the well location has been identified by PlumpJack and the SVPSD.

The effects on projected pool drying for the six well scenario continue to be limited to East Cells A, B and C. As shown in Table 2 of the Todd Groundwater memo and summarized in Table 3-4, for 2040 cumulative conditions for the years analyzed in the DEIR (1993-2011), 37 months with dry pools were predicted for the six well scenario in East Cell A, compared to 31 months identified in the DEIR. In East Cell B, the number of dry months increases from 21 identified in the DEIR to 28 under the six-well scenario. In East Cell C, the number of dry months increases from five to seven. These additional months of drying result in three additional years with some pool drying in East Cell A (the 1993, 2009 and 2010 Model years) compared to the number of years identified in the DEIR. Compared to the DEIR there are two additional years with some pool drying in East Cell B (1996 and 2006 Model years), and one additional years of some pool drying in East Cell C (1994 Model year). The increase in the percentage of total months showing drying for the six well scenario versus the DEIR analysis is 2.6 percent for East Cell A (increase from 13.6 to 16.2 percent), 3.1 percent for East Cell B (increase from 9.2 to 12.3 percent), and 0.8 percent for East Cell C (increase from 2.2 to 3.0 percent).

As indicated above, the 2015 WSA update analyzed an additional three years (2012 through 2014). All three years are each shown to have a single month of pool drying in East Cell A (Table 3-4 [Table 2 in Appendix A]). Some level of pool drying is predicted in years 2012 and 2013 in East Cell B. No pool drying is predicted for years 2012, 2013, and 2014 for East Cell C. The addition of the 2012 through 2014 data results in a decrease in the percentages of total months showing pool drying for all three cells (Table 3-4), with 15 percent for East Cell A, 11.2 percent for East Cell B, and 2.6 percent for East Cell C. These percentages are slightly above those associated with the DEIR data, with East Cell A 1.4 percent above the DEIR results, East Cell B 2.0 percent above, and East Cell C 0.4 percent above.

An increase in the frequency or duration of pool drying has the potential to increase adverse effects on fish and aquatic resources dependent on the refugia pools. However, when the 2012 to 2014 data is incorporated into the groundwater model, the relative increases in occurrences of pond drying compared to those described in the DEIR are small, from 0.4 to 2.0 percent. The following paragraph from the discussion of Impact 6-13 on page 6-79 of the DEIR remains an accurate description of the potential long-term impacts to fish and aquatic resources related to increased groundwater extraction:

> Decreased flow and groundwater inputs would be unlikely to measurably affect fish and other aquatic communities across the entirety of Squaw Creek. Impacts would be geographically localized within the meadow reach of Squaw Creek near the well field. Although the Squaw Creek fish community could experience some adverse effects, the fishery would remain extant. Groundwater withdrawals as evaluated for the WSA would not have an adverse effect on a special-status fish species as none are currently present in Squaw Creek, would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, nor interfere substantially with the movement of fish species in Squaw Creek. However, if the wellfield is not configured and operated as indicated in the WSA, longer and more frequent drying periods could occur, which could threaten the ability of the creek reaches near the well field to maintain a fish community. In addition, vegetation loss resulting from reduced groundwater could lead to potential erosion and adverse impacts to fish and fish habitat. Therefore, the long-term impacts of groundwater pumping to reduced stream flow, increased

channel drying, and reduced bank stability in the meadow reach of Squaw Creek would be **potentially significant** to aquatic habitat and fish populations.

This paragraph identifies the importance of wellfield configuration and operations consistent with those modelled in the WSA. The WSA models a nine-well scenario. Therefore, consistent with the requirements of Mitigation Measure 13-4 (DEIR pages 13-63 through 13-65), whatever well system is eventually installed, it must perform in a manner that does not generate more severe environmental effects. Mitigation Measure 6-1c (DEIR pages 6-49 and 6-50) then provides an additional mechanism to monitor whether potential environmental effects of groundwater pumping are occurring through the monitoring of the response of riparian vegetation to changes in groundwater levels. Both mitigation measures provide various responses if evidence shows that groundwater pumping and related effects on groundwater, surface water, and riparian vegetation are not consistent with what would be expected from a pumping regime consistent with the WSA. Therefore, although based on the groundwater modelling a six-well system would have effects on fisheries and aquatic resources generally consistent with those identified in the DEIR, if effects were found to be substantially more severe, this would be corrected through implementation of mitigation measures already included in the DEIR.

Vegetation Effects

DEIR Summary: The DEIR described potential impacts of groundwater pumping on riparian and meadow vegetation in Impact 6-1. For riparian vegetation, the DEIR focused on the establishment and viability of seedlings and saplings (see page 6-43). As discussed on page 6-43, riparian seedlings and saplings could be adversely affected in areas where groundwater under baseline conditions occurs within 3.3 feet of the surface, but drops below this level under project or cumulative conditions because of groundwater pumping. In areas where groundwater levels are already below 3.3 feet, additional lowering would not affect riparian seedling or sapling survival because existing groundwater elevations do not reach the seedling/sapling root zone; therefore, further lowering of groundwater levels would not alter the accessibility of groundwater to these riparian vegetation age classes. The DEIR concluded that the 2014 WSA scenario was unlikely to result in the mortality of established perennial riparian vegetation located at the same level as the creek in the areas most affected by groundwater withdrawal (see pages 6-43 and 6-44). However, where the creek is incised, vegetation can be located several feet above the creek bed, and could therefore be more vulnerable to lowering of groundwater levels. Some meadow vegetation could be similarly affected. Also, establishment of seedlings and saplings could be degraded if areas where groundwater is currently accessible to these vegetation age classes experience reductions in groundwater levels to below the seedling/sapling root zone (see page 6-44 of the DEIR). If vegetation along the edges of the creek channel was lost because of the lowering of groundwater levels, then the streambank could become less stable, which could lead to increased erosion and sedimentation, affecting water quality in the creek (see page 6-46 of the DEIR). Mitigation Measures 6-1c and 13-4, discussed above, would reduce the vegetation and related water quality impacts to a less-than-significant level by implementing various requirements for groundwater management, monitoring of vegetation for evidence of adverse effects, and remediation/corrective actions if evidence of adverse effects (based on identified performance criteria) is found.

2015 WSA - 9 New Wells: Groundwater elevations from the 2014 and 2015 WSA analyses were compared (see Appendices A and B of the Todd Groundwater memo provided in Appendix B of this FEIR). The 2015 WSA groundwater elevations (which are based on a nine new well scenario) were found to be very similar to the 2014 WSA elevations, although levels would be higher at some times and lower at others. On average, the 2015 WSA scenario shows groundwater levels that are approximately 0.23 feet (approximately 2.75 inches) lower in East Cell A, 0.14 feet (approximately 1.7 inches) lower in East Cell B, and 0.09 feet (approximately 1.1 inches) lower in East Cell C. The largest modelled declines for specific months relative to the 2014 WSA estimated groundwater levels would be 0.6 feet (approximately 7.2 inches) in East Cell A, 0.39 feet (approximately 4.7 inches) in East Cell B, and 0.37 feet (approximately 4.4 inches) in East Cell C. In some cases, the groundwater levels would be higher in the 2015 scenario than shown in 2014. Given these small declines in groundwater elevations (greatest decline is less than 8 inches, average declines less than 3 inches), and the fact that during some years groundwater elevations were found to be higher in the 2015

WSA compared to the 2014 WSA, the results of the 2015 WSA update do not change the conclusions in the DEIR related to potential effects of groundwater pumping on riparian and meadow vegetation.

2015 WSA - 6 New Wells: Groundwater elevations were also evaluated for the six-well scenario to compare the potential impacts on riparian and meadow vegetation. As with the nine-well scenario, the six-well scenario could lower groundwater elevations more than the levels discussed in the DEIR. Evaluation of the differences between the 2015 six-well scenario (which assumes the 2015 water demands) and the 2014 WSA groundwater levels shows average declines of approximately 0.40 feet (approximately 4.8 inches) in East Cell A, 0.30 feet (approximately 3.6 inches) in East Cell B, and 0.24 feet (approximately 2.9 inches) in East Cell C. The greatest declines relative to the 2014 WSA levels would be approximately 0.75 feet (approximately 9.0 inches) in East Cell A, 0.70 feet (approximately 8.4 inches) in East Cell B, and 0.68 feet (approximately 8.2 inches) in East Cell C. As with the nine-well scenario, at some points groundwater levels would be higher than those shown in the 2014 WSA. Given these small declines in groundwater elevations (greatest decline is 9.0 inches, average declines less than 8.0 inches), and the fact that during some years groundwater elevations were found to be higher in the 2015 WSA compared to the 2014 WSA, the results of the 2015 WSA update with the six-well scenario do not change the conclusions in the DEIR related to potential effects of groundwater pumping on riparian and meadow vegetation.

CREEK RESTORATION BENEFITS

The DEIR recognizes that the proposed restoration of Squaw Creek within the VSVSP plan area would increase riparian and wetland vegetation in that area, and if needed, could potentially offset at least some of any effects of groundwater pumping on riparian and meadow vegetation. The extent of restoration benefits was not fully quantified (see page 6-45 of the DEIR). Since the DEIR was prepared, Balance Hydrologics has conducted additional analyses of the effects of creek restoration (Balance Hydrologics, Inc. 2015a; provided in Appendix B of this FEIR). One benefit would be to deepen pools within the boundaries of the main Village area and to include structural elements to maintain scour in pools, so they would intersect the groundwater table for a longer period during the summer months. As a result, following implementation of stream restoration, pool inundation within the VSVSP area could be extended for 20 to 40 days each year, which could be considered to offset some of the potential increase in drying of pools in Cells East A, East B, and East C. Also, the creek restoration (for both Squaw Creek and the Olympic Channel) would increase wetted areas and lower stream bed and bank surface elevations, which would bring vegetation closer to groundwater levels. Approximately 4.3 acres of channel, floodplain, and upper banks would be lowered by more than 2 feet; out of this total, approximately 3.0 acres would be lowered by more than 4 feet (Balance Hydrologics, Inc. 2015a:7). This could provide areas for offsetting the potential loss of vegetation in the Cells East A, East B, and East C, if any occurs, consistent with Mitigation Measure 6-1c. The EIR does not rely on these potential creek restoration benefits to support impact significance conclusions. The DEIR identifies that the creek restoration may act as a mechanism to achieve some mitigation requirements; however, the success of mitigation is not contingent on the creek restoration. If the creek restoration is used to provide formal mitigation benefits, the quantification and approval of those benefits would be subject to the agency permitting review identified in Mitigation Measures 6-1a and 6-1b (i.e., USACE, CDFW, Placer County).

OCCUPANCY RATE SENSITIVITY ANALYSIS MODEL SCENARIOS

Some comments stated that occupancy rates could be higher than estimated. If so, these comments stated, the project's water demand could also be higher than estimated in the WSA and DEIR.

In order to respond to these comments, a set of scenarios with increased lodging occupancy rates for the proposed project were studied to determine whether increased occupancy rates would affect the WSA's conclusions regarding the adequacy of groundwater supplies. Two scenarios were included; one with nine new wells and one with six new wells. The six new well wellfield was the same as the one described above. Results are described in the memorandum, *Updated Model Simulated Scenario Descriptions and Results Transmittal* (Todd Groundwater 2015b; provided in Appendix B of this FEIR).

As discussed in more detail below, both of these scenarios met the saturation criterion, and so demonstrate that groundwater supplies would be adequate to serve the existing water demand and proposed project and non-project growth, with six or nine new wells, even at higher occupancy rates (see the Master Response regarding occupancy assumptions for a validation of the occupancy rates that were used in the DEIR).

The following summary focuses on the most conservative scenario: 2040 with project and non-project cumulative analysis. This scenario is the most conservative because it involves the highest potential water demand. The technical memo also reports on the project-only and non-project conditions, each of which would involve less groundwater use than the 2040 with project and non-project development analysis.

The sensitivity analysis focused on groundwater sufficiency only.

Nine-Well Simulation with Increased Occupancy Rates: For this simulation, the assumptions for the number of wells and the configuration of the well-field were identical to the 2015 WSA update. The only change in model assumptions was that occupancy rates for the proposed project were increased by 5 percent, to an annual average of 61.3 percent (compared to 55.2 percent in the 2014 WSA and DEIR and 56.3 percent in the 2015 WSA update). This number was selected because it essentially reflects the highest single year (not average, but a peak year) at any comparable set of properties in the United States between 2002 and 2014. See the Master Response regarding occupancy assumptions. This simulation showed a slightly lower average percent saturation than the 2015 WSA; however, the saturation level remained well above the 65 percent threshold. The purpose of this analysis was to provide additional certainty that water supply would be adequate by evaluating a demand that would be higher than the reasonably foreseeable demand. Note that this analysis focuses on water supply only, not any of the other environmental resources evaluated in the EIR. There are four reasons why this scenario has not been carried over to environmental resources other than the sufficiency of available water supplies:

1. This is not a reasonably foreseeable rate of occupancy for the project. As explained in the Master Response regarding occupancy assumptions, this rate of occupancy has been experienced for one year only, at one comparable property in the United States, and even that comparable property had an annual average rate (over several years) of below 53 percent.

2. Additional analysis of the effects of groundwater withdrawals on vegetation and refugia pools was not conducted because, as discussed above there is substantial evidence to support the occupancy rates (and therefore resulting water demand and pumping rates) that were analyzed in the 2015 WSA update.

3. Water is an essential public health issue. Thus, because there was evidence of annual occupancy for a year at this rate, and given the nature of the Olympic Valley groundwater basin (it fills completely, or near completely, and lowers each year), it was prudent to test a “what if” occupancy event at this level for one year, particularly in the context of maximum conceivable water demand for a peak year.

4. The only other issue evaluated in the EIR that is tied to average occupancy is climate change effects associated with greenhouse gas (GHG) emissions. All other issues (e.g., traffic, noise, air quality) are either based on peak day effects or the overall footprint of development. With regard to climate change effects, given that this is not a foreseeable annual average, and *if this level of occupancy did occur for one year* (which is not expected), the incremental increase in associated GHG emissions from the project (5 percent more for one year) would be small and could not be credibly argued to substantially effect global climate change.

Six-Well Simulation: The six-well simulation used the same demands as the nine-well simulation, increased occupancy analysis, except that only six new wells were included in the simulation. The six-new-well wellfield in this scenario was the same as that described above. As with the 6-well simulation for the 2015 WSA update demands, the six-well simulation using increased demands to account for higher occupancy showed a greater percentage of saturated thickness compared to the nine-well simulation, because the six wells were located in thicker and more productive areas of the aquifer.

Findings from Occupancy Rate Sensitivity Analysis: The above simulations demonstrate that, even in the unlikely event that occupancy rates occasionally exceed the levels described in the DEIR and WSAs, there would be sufficient groundwater to serve existing users, the proposed project and non-project cumulative growth under normal, dry and multiple dry years. That would be true regardless of whether six or nine wells are installed in the configurations that have been studied to date. As recognized in the DEIR, the ultimate well-field configuration could be different from the well field analyzed in the WSA, in which case, Mitigation Measure 13-4 would be implemented. This measure requires that the applicant work with the SVPSD to develop and implement a Pumping Management Plan that continues to monitor groundwater, wellfield system operations, and the need for additional wells. The SVPSD currently implements a monitoring plan for existing wells and would extend this monitoring plan to new wells. The DEIR concludes the implementation of Mitigation Measure 13-4 would reduce the uncertainty associated with well system design and operation, and would assure that drawdown effects are managed to avoid insufficient groundwater elevations and meet standards identified in the WSA.

OTHER WATER-RELATED ISSUES

Mountain Precipitation Data: A number of comments observed that the DEIR overestimated mountain precipitation, and asserted that, as a result, the groundwater analysis overestimated the amount of water available to serve the proposed project. The 2014 WSA and the DEIR did misstate the amount of mountain precipitation. However, this overestimate did not affect the analysis of groundwater supply because the mountain precipitation was not included in the numerical groundwater model. The 2015 WSA update presents the corrected data. In addition, the annual mountain precipitation data presented in the DEIR Exhibits 13-3 and 13-4 have been revised to reflect the incremental precipitation for the SNOTEL Gold Coast Squaw Valley station, as shown in Figure 3-1 from the 2015 WSA update (see Section 2.3, "Revisions to the DEIR," of this FEIR). As stated in the DEIR (page 13-13), the numerical model did not use these data to estimate mountain front recharge in either the historical calibration period or the future predictive period used to simulate project impacts. The recharge to the model is based on precipitation on the valley floor and urban return flow. The precipitation on the floor of Olympic Valley used in the numerical groundwater model (for both the 2014 and 2015 WSAs) is measured at the Squaw Valley Fire Station and shown correctly in Exhibit 13-4 of the DEIR. The range of annual recharge in the model is because of the varying hydrologic conditions observed at the Fire Station, not different data sources; 2001 was a dry year and 2011 a relatively wet year. Neither the numerical groundwater model nor the effects of increased groundwater production assessed using the model is changed as a result of the revision to the SNOTEL precipitation information.

Climate Change Effects on Water Supply: Several comments addressed the consideration of future climate change in the DEIR. Limited information exists on how climate change will affect precipitation patterns in the Olympic Valley. As such, the future model simulations repeated past observed hydrologic conditions to simulate recharge and streamflow volumes and timing. While insufficient detail exists on climate change to simulate in the numerical model, climate change was considered and relevant information regarding predictions for future climate change and the relationship between precipitation in the watershed and groundwater recharge in Section 7 of both the 2014 WSA and the 2015 WSA update. The WSAs consider and reference available studies that have quantified changes in future precipitation in the Sierra Nevada Mountains and the Tahoe Basin. The analysis in the WSAs concludes that even the most conservative estimates of annual runoff reduction have a limited effect on the availability of potential recharge to the Basin. However, the mechanisms and timings of recharge in the Basin are complex and while total annual potential recharge is important, it is not the sole factor in groundwater water supply availability.

The 2015 WSA update addresses the potential for changes in water reliability because of climate change in Section 7, which includes presentation of calculations of total average precipitation in the Squaw Creek watershed that could potentially be available for groundwater recharge. This calculation shows that an average of 25,341 AFY of precipitation falls within the watershed (2015 WSA update, page 7-2). The 2015 WSA update compares total precipitation and total groundwater demand; groundwater demand in 2040 is estimated to be 1,186 AFY (Table 5-2 in the 2015 WSA update), which amounts to 4.7 percent of the total

precipitation on the watershed. The low ratio of groundwater development to precipitation suggests that the total amount of precipitation and potential climate variations are not direct controlling factors in groundwater supply and development, and that future climate variation can be accommodated through active monitoring, modeling, and management of the Olympic Valley groundwater basin (see Mitigation Measure 13-4).

Any more detailed quantitative analysis of the specific effects of climate change on Olympic Valley groundwater conditions without specific information on how climate change will affect specific precipitation patterns in Squaw Valley would be speculative, unsubstantiated, and uncertain. According to Section 15145 of the CEQA Guidelines, if, after thorough investigation, the County finds that an impact is too speculative to be evaluated, then this should be noted and the discussion of the impact terminated. Therefore, the EIR provides only as much evaluation that can be undertaken without undue speculation.

Irrigation: Several comments observed that mitigation in the DEIR includes the possibility of irrigating riparian or meadow vegetation during dry periods to offset the effects of groundwater pumping, and that such an approach would use more groundwater, thereby causing groundwater levels to drop further.

To determine if irrigation to offset impacts on riparian and/or meadow vegetation would substantially increase water demand, MacKay & Somps prepared an updated and refined analysis of irrigation demands (MacKay & Somps 2015b; provided in Appendix B of this FEIR). The 2015 WSA update estimated dry year irrigation demands to be 12.7 AFA. This demand was based on water needed to irrigate project landscaping and the acreage to be landscaped. The analysis then calculated the amount of irrigation that would be needed for the Squaw Creek restoration and the area of the meadow and Squaw Creek where groundwater levels could affect vegetation (East Cells A, B and C). The September 2015 analysis refined the water demand for project landscaping, based on a more specific list of native and drought tolerant flora that would be used. The results of that analysis are summarized in Table 3-5.

Table 3-5 Summary of Irrigation Demand: 4 Month Dry Period[1]

Area to be Irrigated	Water Demand (in acre feet)
VSVSP Landscaping	2.3
Squaw Creek Restoration	5.7
Squaw Creek East Cells A through C	0.8
Total	**8.9[2]**

Notes:
[1] The 4-month dry period is September through October.
[2] Total matches the value in MacKay & Somps 2015b. Does not match addition of table values due to rounding.

Source: MacKay & Somps 2015b

The annual demand for irrigation was estimated to be 10.6 AFA, 2.1 AFY lower than assumed in the 2015 WSA update. However, the irrigation demand during the dry period would be 8.9 AF, which is approximately 1.6 AFY higher than anticipated in the 2015 WSA update. This slight increase in demand could likely be met by Basin groundwater pumping before full buildout of the VSVSP, and likely could be met even at buildout. Nonetheless, MacKay & Somps analyzed another option that would not require additional groundwater from the Basin.

Snowmaking bedrock wells remain idle during the summer. Farr West Engineering has estimated that the combined capacity of snowmaking bedrock wells is 325 gallons per minute for 8 to 12 hours per day during critically dry years (Farr West Engineering 2015b). MacKay & Somps assumed that the wells could run for 8 hours per day to provide water for irrigation; this water would be delivered via water truck, which would fill from a stand pipe connected directly to the wells. The trucks would likely fill a temporary non-potable water storage tank placed near the MAC, and water from the tank would feed a drip irrigation system at the restoration site(s). During the months of July and August, it is estimated that irrigation demand would require

up to four truck trips per day. During September and October, three and two truck trips per day would be required, respectively. These trips would be internal and would, therefore, not affect traffic operations on County roads. This analysis demonstrates that vegetation within the VSVSP area and mitigation areas could be irrigated during dry periods without increasing demand on the Olympic Valley Groundwater Basin.

IMPACTS ON THE TRUCKEE RIVER

A number of comments stated that the DEIR did not analyze impacts of groundwater use on the Truckee River. Therefore, an analysis was prepared to evaluate the extent to which groundwater withdrawals within the Olympic Valley could affect streamflows in the Truckee River (Balance Hydrologics, Inc. 2015b; provided in Appendix B of this FEIR). As discussed in the streamflow analysis, the Truckee River watershed immediately upstream of the Town of Truckee is approximately 553 square miles. Squaw Creek has a watershed of approximately 8 square miles, approximately 17 percent of the Truckee River watershed between Tahoe City and the Town of Truckee, and less than 2 percent of the entire Truckee River watershed. The extent to which Squaw Creek contributes to streamflows varies according to seasons and other sources of water flowing to the Truckee River. For example, during July and August, when releases from Lake Tahoe tend to be at their maximum, Squaw Creek streamflow is at its lowest, and contributes less than 5 percent of total flows to the Truckee River in July, declining to just 1 percent of total flow in August and less than 1 percent in September (Balance Hydrologics, Inc. 2015b, Table 1).

The streamflow analysis evaluated the reductions in Truckee River streamflows that could result if all of the groundwater withdrawals required to meet water demand for VSVSP and cumulative development in Olympic Valley came from Squaw Creek streamflow. This very conservative assumption results in reductions in streamflows within the Truckee River equal to the amount of groundwater pumping within the Olympic Valley needed to serve the VSVSP and cumulative development. Average monthly flows in the Truckee River range from 63.1 cubic feet per second (cfs) to 392.5 cfs depending on the month and reach (the streamflow analysis looked at river gages located at Tahoe City and near Truckee). The VSVSP at buildout is estimated to require 12.3 to 26.7 AF to meet monthly demand for water supply, which translates to 0.2 to 0.4 cfs. Cumulative monthly demand in the Olympic Valley (including the VSVSP) would range from 48.1 to 163.1 AF, which translates to 0.8 to 2.7 cfs. Comparing the average monthly flows in the Truckee River to the corresponding streamflow reductions from Squaw Creek (assuming they are equivalent to groundwater withdrawals) shows reductions ranging from 0.3 to 1.4 percent, depending on the month (Balance Hydrologics, Inc. 2015b, Table 3). Based on streamflow and stream stage (water depth) measurements taken on the Truckee River near the Town of Truckee, a reduction of 3 cfs (slightly more than would occur in the highest demand month) would result in a decline in water surface level of less than 0.01 foot (less than 0.12 inch). This decline would not be enough to adversely affect biological resources and/or water quality within the Truckee River.

Regarding water supply, the proposed project would not substantially reduce the amount of total water available in the Truckee River. The Truckee River streamflows at Tahoe City and the Town of Truckee equate to monthly averages of 3,881 to 24,136 acre feet/month. The streamflow analysis reports that average monthly demand for cumulative development in the Olympic Valley (with the VSVSP) would range from 48.1 to 163.1 acre feet/month, representing less than 3 percent of the Truckee River flow in any month. Given that water would be supplied to the VSVSP and cumulative development from both groundwater and mountain bedrock water, the percentage of potential effect on the Truckee River as streamflow would be even less than 3 percent of the river's streamflow.

3.1.2 Master Response: Traffic

Comments were received on multiple topics related to traffic and the analysis of transportation and circulation in Chapter 9 of the DEIR. Often, the same topic was raised in multiple comment letters. Responses to these comment topic areas are provided below.

STUDY OF TRAFFIC CONDITIONS ON INTERSTATE 80

Several comments suggested that the traffic study area used in the DEIR should have included mainline segments of Interstate 80 (I-80). The California Department of Transportation (Caltrans) has jurisdiction over I-80 and was consulted regarding the traffic impact study area to be used for the DEIR; which included a scoping meeting held with Caltrans staff on February 14, 2012. The purpose of the meeting was to solicit Caltrans' input on analysis locations, time periods, and methodologies. When asked whether I-80 should be studied, Caltrans staff indicated the on/off ramps with SR 89 should be included in the study area, but that it was not necessary to study the mainline. This direction was further confirmed by email exchange after the meeting. In addition, Caltrans issued a comment letter on the DEIR, which made no mention of the need to analyze the I-80 mainline.

Notwithstanding the above conditions, an evaluation of potential project impacts on I-80 is presented here to respond to comments on the DEIR. Table 3-6 displays proposed project trips that would be added to the mainline segment of I-80 west of SR 89 (i.e., the direction supporting traffic to and from Sacramento and the Bay Area).

Table 3-6 Project-Added Traffic on I-80 west of SR 89

Scenario	Project-Added Traffic[1]			Increase in Volume-to-Capacity (V/C) Ratio[2]
	Eastbound I-80	Westbound I-80	Total	
Winter Saturday AM Peak Hour	33	28	61	0.01
Winter Sunday PM Peak Hour	20	62	82	0.01
Summer Friday PM Peak Hour	77	75	162	0.03

Notes:
[1] Source of project-added traffic is DEIR Exhibit 9-10.
[2] V/C Ratio calculated based on freeway capacity from the *Interstate 80 Transportation Corridor Concept Report* (Caltrans 2010).

Source: Data provided by Fehr & Peers in 2015

The segment of I-80 from Kingvale (i.e., the Soda Springs area west of Truckee) across the Donner Summit to Donner Pass Road is 13 miles consisting of mountainous terrain. According to the *Interstate 80 Transportation Corridor Concept Report (TCCR)* (Caltrans 2010), it operated at LOS D and had an average annual daily traffic (AADT) of 27,000 vehicles in 2007. It has a 20-year concept LOS of F (i.e., expected operation in 20 years). The TCCR indicates that this segment of I-80 has a peak hour volume of 4,950 vehicles, which represents a 0.87 volume-to-capacity ratio. This implies a capacity of 5,690 vehicles per hour. This capacity value is well below the typical 'per lane' capacity of 2,000 vehicles per hour (i.e., 8,000 vehicles per hour for a four-lane freeway). This suggests that Caltrans' estimates already consider the effects of the mountainous terrain and/or winter weather conditions.

Had this segment of I-80 been incorporated into the DEIR traffic analysis, existing operations would presumably have been at an unacceptable level given that a peak winter ski weekend and peak summer Friday were the study periods used for the DEIR. Page 9-32 of the DEIR describes how a 0.05 increase in the v/c ratio was applied to judge the significance of impacts for segments of SR 89 operating unacceptably. Had I-80 been included in the DEIR study area, this same significance criterion would have been applied in the DEIR. Table 3-6 indicates that the project would not cause a 0.05 v/c ratio increase. Hence, project impacts to I-80 would be less than significant.

SPECIFIC PLAN POLICY CP-1

Policy CP-1 in the April 2015 VSVSP provided with the DEIR acknowledges that resort areas experience various peak traffic periods and allows for LOS F conditions in the Plan Area during peak periods. The existing County standard for roadways within the Plan Area is either LOS C or LOS D (depending on the location of the roadway segment). Several commenters expressed a concern that allowing LOS F conditions

via Specific Plan Policy CP-1 could limit the ability to properly evaluate the traffic impacts of further future development projects in Olympic Valley because added traffic from these projects could not make an LOS F condition any worse; therefore, significant adverse traffic impacts could not be identified. In response, it is noted that Placer County policies (see page 9-29 of DEIR) only permit LOS degradations below typical County standards within a Community or Specific Plan area. In this particular instance, the LOS F exception would only include County road intersections within the Plan Area: the Squaw Valley Road/Village East Road and Squaw Valley Road/Far East Road/Christy Hill Road intersections. Squaw Valley Road intersections and roadway segments to the east of the main Village area would not be subject to this policy. As such, traffic impacts from the project, and future phases of the project, have been, and would continue to be, evaluated against the County LOS standards. In addition, the County would examine the effects of future projects on intersections within the VSVSP; even if those intersections may operate at LOS F, other factors that affect intersection could be considered, such as queue length. It is further noted that the two intersections subject to Policy CP-1 already operate at LOS E or F during existing peak winter periods (see Table 9-8 in the DEIR) and this is part of the existing baseline condition.

EMERGENCY VEHICLE ACCESS/WILDLAND FIRE EVACUATION PLAN

Several comments expressed concerns regarding the ability to provide and maintain emergency vehicle access during project implementation. Mitigation Measure 9-8 on page 9-67 of the DEIR addresses this issue as it relates to project construction. The mitigation measure requires that a Construction Traffic Management Plan (CTMP) be prepared and implemented, and it must address, among other topics, the preservation of emergency vehicle access during construction and the removal of any traffic obstructions during emergency evacuation events. The CTMP must satisfy both the Placer County Department of Public Works and the Engineering and Survey Division. With implementation of Mitigation Measure 9-8, impacts related to construction traffic, including those related to emergency vehicle access, are reduced to a less-than-significant level.

Regarding the potential for traffic generated by project operations to impede emergency vehicle access; emergency vehicle access is currently maintained during peak winter and summer traffic periods. Visitors are also airlifted by helicopter to receive treatment, typically at hospitals in Reno or Sacramento, depending on the severity of their injuries. The project would not change this practice. Roadway emergency access would also continue to be ensured through various methods, such as emergency vehicles driving on the road shoulder as needed, or traffic control personnel (typically present during peak traffic periods) moving cars to the edge of the roadway ahead of the emergency vehicle. Emergency vehicles currently serve Olympic Valley residents and visitors when Squaw Valley Road and other roadways are at peak traffic levels. The potential for snow accumulations, weather, and other factors to slow emergency vehicles is an existing condition that emergency responders currently contend with. As far as the regular presence of lines of vehicles on local roadways during peak traffic periods and the potential for these vehicles to slow emergency vehicle travel, the proposed project causes little change from the existing condition; peak days and associated lining up of cars on local roadways will continue to occur with or without the proposed project. It should be noted that Squaw Valley Resort and Placer County have for many years been signatories to an agreement to meter afternoon departing skier traffic to address eastbound traffic queues on Squaw Valley Road. In some circumstances, the proposed project may make the presence of lines of cars last slightly longer, or slightly extend the length of lines of cars. Finally, Squaw Valley is currently working with the Squaw Valley Fire Department (SVFD) to support locating a fire truck at the west end of the Valley on peak days; this truck would be parked on location before peak traffic begins and would remain there throughout the peak day to further enhance existing emergency vehicle access.

On Page 14-45 of the DEIR, Mitigation Measure 14-7 includes the requirement that the development agreement between the applicant and the SVPSD include the provision for the project applicant to support a new fire substation in the western Olympic Valley. Support can consist of provision of land within the Specific Plan area, provision of land elsewhere in the Village area, assistance with conversion of the “old” fire station on Chamonix Place to the substation, or other measures. The mitigation measure requires that development agreement include the condition that by the time 50 percent of any combination of the condo hotel units has

been built, the SVFD will have the fire substation in place and active. This will provide the opportunity to have emergency response personnel and equipment in the west end of the Valley, reducing the potential for traffic on Squaw Valley Road to influence emergency response.

Comments also suggest that the DEIR does not evaluate a scenario where the need for evacuation of Olympic Valley occurs (e.g., because of an approaching wildfire) concurrent with peak traffic conditions on Squaw Valley Road. The discussion of Impact 15-4 (Interference with an adopted emergency evacuation plan) on page 15-21 of the DEIR states that the existing *Wildfire Evacuation Plan* for Squaw Valley (included as Appendix J to the DEIR), anticipates conditions where evacuation via Squaw Valley Road may not be feasible (whether from traffic congestion or other factors), identifies evacuation protocols and evacuation routes, and identifies the Squaw Valley Resort parking lot as a gathering point in the event of a wildland fire. The proposed project would continue to provide parking areas suitable for this use. The proposed project does not impede the continued implementation of the existing *Wildfire Evacuation Plan*.

The DEIR also includes a discussion of Mitigation Measure 15-4 (Implement Mitigation Measure 9-8: Construction Traffic Management Plan), and describes how the proposed project would continue to provide parking and other areas suitable for ensuring less-than-significant wildfire evacuation risk despite bringing new operations, development, and people into the area. (See also DEIR pages 15-22 thru 15-23 [Impact 15-6: Expose people or structures to a significant risk of loss, injury, or death involving wildfires]). With mitigation, the proposed project would not result in a significant adverse impact by either interfering with an adopted emergency evacuation plan (Impact 15-4) or exposing people and structures to an area with a high risk of wildfire (Impact 15-6). (DEIR pages 15-21 thru 15-23; see also Mitigation Measure 14-7b [required SVFD Agreement].) The project also would not impede the continued implementation of the existing *Wildfire Evacuation Plan*.

See also Chapter 2, "Revisions to the DEIR," of this FEIR for modifications to Impact 15-4 to include discussion of the Emergency Preparedness and Evacuation Plan (EPEP) that is being prepared for the project. As discussed therein, the EPEP will address the potential risks from wildfire, seismic risks, avalanches, and flooding hazards within the plan area, as well as evacuation. The completed EPEP will be submitted to the Board of Supervisors when the Board considers project approval; it will be adopted as part of the VSVSP. The EPEP is intended to provide a coherent road map for which to prepare and guide VSVSP staff in the unlikely event of an emergency. In addition to compliance with State, County, and other local laws and regulations, such as the defensible space and fuel maintenance requirements mentioned above, the EPEP will include:

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

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

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

and guests when there may be a need to take action due to an emergency, up to and including evacuation of the plan area.

In addition, since publication of the DEIR, further analysis of traffic conditions during an evacuation scenario has been conducted (LSC 2016). The analysis evaluated an example evacuation scenario where:

- evacuation is ordered because of a wildfire during the peak summer season;
- all homes and lodging in Olympic Valley are assumed fully occupied (100 percent occupancy in the entire Valley) and associated employees are present;
- no "shelter in place" options are exercised;
- emergency responders provide traffic control at key intersections, but no special roadway lane configurations are used (e.g., coning to create an additional lane in one direction);
- the direction of the evacuation is towards Truckee;
- all evacuees exit in the vehicles they used to arrive in Olympic Valley in, no consolidation to shuttle busses or similar measures are used;
- local roadways are already accommodating peak traffic volumes, simulating an evacuation that incorporates more than just Olympic Valley; and
- beyond residents, lodging guests, and employees, an additional 200 vehicles are included to represent visitors present in the Valley when the evacuation order is given,

Many of these assumptions are conservative in that they would generate more vehicles than would actually occur. For example, it would be highly unlikely that 100 percent of all homes and lodging in Olympic Valley would be occupied at any one time.

Based on the analysis and the assumptions used, it is estimated that with existing development in Olympic Valley, it would take approximately 2.9 hours for all vehicles to leave the Valley. If the VSVSP were added to existing development, it would take approximately 5.0 hours for all vehicles to exit the Valley (an additional two hours). Under a cumulative condition, with future development throughout the region and the VSVSP in place (i.e., full project buildout at 2040), it is estimated that it would take approximately 6.6 hours for all vehicles to exit the Valley.

Special events conducted during the summer months (e.g., Wanderlust, Spartan Race) were also evaluated. Assuming 10,000 persons were present for a special event, and on average there were three persons per vehicle, it would take approximately 3.3 hours to evacuate all event participants under existing conditions, 3.6 hours under existing conditions with the VSVSP, and 4.1 hours under cumulative 2040 conditions with the VSVSP.

The evacuation time for vehicles associated with a special event would be additive to the evacuation time for residents and lodging guests, although it would not be expected that it would be 100 percent additive as it would be anticipated that at least some event participants would use lodging in Olympic Valley and at least some residents would participate in the event. However, taking a worst-case-scenario, assuming an evacuation is ordered during a period of 100 percent occupancy, while a large special event is occurring, and no event participants overlap with residents and lodging guests, at full buildout of the VSVSP and considering other expected cumulative development in Olympic Valley in 2040, it is estimated that it could take up to 10.7 hours for every vehicle present to leave the Valley.

Although the proposed project, or any project that adds people to an area, would add time to complete an evacuation, this does not necessarily generate a safety risk. Emergency personnel who issue an evacuation

order take into account the time needed to implement an evacuation when determining when and where to issue evacuation orders. If an evacuation were needed during a peak occupancy period, it would be expected to be ordered sooner than during a low occupancy period to allow sufficient time to implement the evacuation. For events like wildfires, the fires are tracked from the moment of discovery, and risk to nearby development is assessed on a regular basis. Days of lead time are often available to assess risk and make evacuation determinations. During these periods, peak occupancy conditions typically do not occur as drifting smoke, awareness of the risk, or other factors result in people avoiding the area. The cancellation of the 2014 Iron Man event at Squaw Valley in response to poor air quality from the King Fire is an example of this phenomenon.

If a wildfire ignited in or near Olympic Valley required a more rapid response, there are shelter in place options (e.g., parking areas, buildings designed for fire resistance, the golf course) that are distant from fire fuels and that can temporarily hold people as an evacuation proceeds. In addition, Olympic Valley is a relatively large area. The Valley floor is over two miles long and 0.25 mile wide. It is highly unlikely that the entire Valley would be at risk simultaneously. The more likely scenario is that evacuation orders would encompass only the parts of the Valley at high risk, and a complete rapid Valley evacuation would not be needed.

ADEQUACY OF PARKING SUPPLY

Several commenters stated that an insufficient supply of parking is provided by the proposed project. One comment presented a lengthy discussion of parking demand ratios and the project's parking supply. In particular, the rate of 0.75 space per 1-bedroom unit was a concern. It should be noted, however, that this rate is only for the guest parking component, and excludes the 0.11 space per unit associated with employees. The demand for lodging parking is also reduced by non-auto guest access (at present, 4.7 percent of Squaw Valley lodging guests arrive by non-auto modes such as airport shuttle vans) and that some guest travel groups rent more than one unit.

The applicant's decision of how much parking to provide is driven in large part by economic factors outside the scope of CEQA, such as the expectation of parking as an amenity provided with lodging, the accessibility of parking spaces to be provided to guests (e.g., proximity to lodging units, availability of valet parking, remote parking with shuttle) and the value that parking availability and convenience provides with the lodging experience. The issue of parking supply versus demand is not a significance criterion under CEQA. Further, because the hotel/condo structured lots (podium parking within project buildings) are private and not available for use by the general public, the applicant has the ability to control the parking demand so as to not exceed the available supply. The applicant can also dictate the flow of traffic into the garages so that patrons are not 'searching fruitlessly through public facilities to find parking' as is asserted in some comments.

The analysis of day skier parking demand was based upon an extensive data collection effort, including daily parking counts throughout the 2011-12 season. The analysis, as presented in *Village at Squaw Valley Parking Study* (LSC Transportation Consultants, September 2014, provided in Appendix G of the DEIR) and reviewed by Fehr and Peers and found acceptable for use in describing the parking demand, includes a detailed "check" of the demand estimates against the actual recorded peak parking counts (see, for example, Table 10 in the Parking Study). Over four peak days, the demand methodology averaged within 1 percent of the actual observed parking demand. The methodology also closely (within 5 percent) identified the actual 5th highest observed parking demand over the course of the ski season (see Table 11). This is considered to be an adequately accurate means of estimating parking demand, given the variation in the many factors impacting parking demand at a ski resort area. (See also DEIR Section 9.1.5, "Parking.")

PAID PARKING

Several commenters suggested that paid parking could be an effective means for mitigating project impacts related to traffic trips. Under appropriate circumstances establishing parking fees can substantially reduce

auto use. However, implementing paid parking could have implications beyond the impacts of the proposed development, such as affecting ski area operations (some portion of skiers could go to other resorts to avoid parking fees), other businesses and tenants in the base area, as well as (through potential spillover parking to avoid parking fees) nearby residential areas. No ski resorts in the Tahoe area currently charge for regular parking, although some ski resorts, including Squaw Valley, charge for preferred parking; charging for regular parking at only one ski resort could create a competitive disadvantage for that resort. This issue is more appropriate to consider as part of a community planning process and policy decision, rather than as a CEQA analysis for a specific development project. Also, potential shifts in skier activity to avoid parking fees could result in negative impacts at other ski area resorts, by, for example, increasing traffic congestion in the vicinity of those resorts.

CONSIDERATION OF CONSTRUCTION IMPACTS

Several commenters suggested that the impacts of construction traffic on weekday Summer AM and PM peak hours should be quantitatively analyzed. To address this comment, a further analysis of project-construction activity effects was conducted. Table 3-7 displays existing volumes on Squaw Valley Road on Friday, August 14, 2015. A worst-case scenario consists of the maximum 136 construction workers (see discussion of Impact 5-1 in the DEIR where project construction is estimated to generate up to 136 construction jobs during the peak construction year), all arriving during the AM peak hour, and all departing during the PM peak hour (refer to the notes in Table 3-7 for additional details). This table shows that project construction activities would add up to 156 trips during each peak hour. This would result in a total of 444 AM peak hour and 583 PM peak hour trips (both directions) on Squaw Valley Road west of Squaw Creek Road. These volumes are substantially lower than the 1,037 trips shown on Exhibit 9-11 of the DEIR during the Summer Friday PM peak hour under existing plus project conditions (i.e., full project buildout)

It is recognized that construction activity would occur throughout the project buildout process. The following example highlights a reasonable scenario. For this scenario it is assumed that 80 percent of the project is already constructed and the remaining 20 percent is under construction. The rate of construction requires 50 percent of the estimated maximum construction workforce or 68 construction workers (i.e., 50 percent of the 136 construction workers estimated to be needed if 20 percent of the overall project construction effort was completed in a single year). Such a situation would result in Squaw Valley Road (in both directions) experiencing an increase of 80 percent of the 587 PM peak hour project trips (470 trips) added to the existing volume of 439 PM peak hour trips along with an additional 78 construction trips (50 percent of the 156 trips identified above for 136 construction workers). Under this condition, Squaw Valley Road would carry 987 trips in both directions during the PM peak hour, which is less than the 1,037 trips shown on Exhibit 9-11 of the DEIR during the Summer Friday PM peak hour under existing plus project conditions (i.e., full project buildout).

Calculating the addition of construction trips another way, assuming 95 percent of the project was built out, and project trip generation was 95 percent of the 587 total summer PM peak hour trip generation at buildout; this would have the project generating approximately 558 PM peak hour trips, 29 fewer trips than at full buildout. Concurrently, 78 construction-related PM peak hour trips would be generated per the scenario described in the paragraph above (although this is likely a larger than necessary construction workforce to complete 5 percent of the project construction effort, even if completed in a single construction season). This would result in a net gain of 49 PM peak hour trips relative to full buildout. The significance of the traffic impact combining project and construction generated trips under this scenario would not be different from the impacts already described in the DEIR for full project buildout, that is, the LOS results shown in Table 9-21 for the summer Friday PM peak hour for the existing plus project conditions would not change.

Thus, even under these various scenarios where project generated trips are added to construction trips, the added construction impacts would not result in new significant impacts. Project operational impacts along Squaw Valley Road, with the exception of some intersections within the Plan Area, would be reduced to less-than-significant levels with traffic control measures. Implementation of Mitigation Measure 9-8, Develop a

Construction Traffic Management Plan, which includes various traffic control measures, would continue to be expected to reduce construction traffic impacts to a less-than-significant level.

Table 3-7 Effect of Construction Traffic on Weekday Peak Hour Traffic Levels on Squaw Valley Road

Scenario	Traffic Volume on Squaw Valley Road					
	AM Peak Hour (8-9 AM)			PM Peak Hour (5-6 PM)		
	East-bound	West-bound	Total	East-bound	West-bound	Total
Existing Conditions[1]	142	146	288	241	186	427
Project-Construction Trips	10	146	156	146	10	156
Existing Plus Project Conditions	152	292	444	387	196	583

Notes: The following worst-case construction scenario assumed for analysis purposes: Maximum of 136 construction workers assumed to work at job site. All workers drive alone. All workers arrive and depart during the AM and PM peak hours. An additional ten round trip delivery trucks also occur during each of the AM and PM peak hours.

[1] Existing conditions based on traffic counts conducted on Squaw Valley Road west of Squaw Creek Road on Friday, August 14, 2015.

Source: Data provided by Fehr & Peers in 2015

FANNY BRIDGE REVITALIZATION PROJECT

The Fanny Bridge Revitalization project is listed in Table 18-2 of the DEIR as a cumulative project. Page 18-18 of DEIR describes this project and indicates that at the time the DEIR technical analysis was being completed, a preferred alternative for this project had not yet been selected. Accordingly, the DEIR conservatively assumed no improvements would be constructed at the SR 89/SR 28 intersection for the cumulative conditions analysis. It would have been speculative to assume any of the six alternatives would be constructed because a preferred alternative had not been chosen, particularly given that once completed as estimated in 2018, the Fanny Bridge Revitalization Project would improve traffic conditions at the SR 89/SR 28 intersection, resulting in traffic impacts at this intersection less severe than identified in the DEIR. See http://www.tahoetransportation.org/fanny-new-1.

ADDED VEHICLE TRAVEL IN THE TAHOE BASIN

As requested by several commenters, the vehicle miles traveled (VMT) generated by the project within the TRPA boundary was estimated for a summer Friday daily condition. It should be noted, however, that the proposed project would not be located in the Basin and is not under the jurisdiction of TRPA, so effects on the TRPA thresholds are not used as standards of significance in this EIR (although, physical effects on the Basin are evaluated, where applicable).

The project's estimated ADT on a peak summer Friday week is 3,300 trips, which is based on recently observed trip rates at the Marriott Timbers timeshare/hotel on South Shore (refer to response to comment O8d-2). Using the trip distribution data, it is estimated that approximately 41 percent of those trips will travel into the TRPA boundary. The origins-destinations of those trips were determined based on existing travel patterns, summer Squaw Valley employee residence locations, and knowledge of the Tahoe area. This FEIR includes a printout of the spreadsheets used to develop the VMT estimates in Appendix C. The project's summer Friday VMT estimate within the TRPA boundary is 23,842. Total VMT in the TRPA boundary was estimated in the Regional Plan (at Table 3.3-5) to be 1,984,600 for summer 2010 conditions. The project would result in an estimated 1.2 percent increase in VMT within the TRPA boundary. The TRPA environmental carrying capacity threshold calls for the Tahoe Region's VMT to be at least 10 percent below its 1981 level, which establishes a VMT threshold of 2,067,600. The addition of the project's VMT to the 2010 summer value would result in 2,008,442, which would remain below this VMT threshold.

A review of several recent EIRs and EISs prepared within the Tahoe Basin was conducted to determine how those documents treated the TRPA VMT threshold. The following documents were reviewed:

- Heavenly Mountain Resort Epic Discovery Project EIR/EIS (2014),
- Edgewood Lodge and Golf Course Improvement Project Draft EIS (2012),
- Homewood Mountain Resort Ski Area Master Plan EIR/EIS (2011), and
- Boulder Bay Community Enhancement Program EIS (2009).

Although all of these documents cited the TRPA environmental carrying capacity VMT threshold, only the Edgewood Lodge project used it as a threshold of significance. The significance criterion in that document was "…result in an increase in VMT that is substantial in relation to the regional VMT threshold standard." However, there was no definition of what constituted a 'substantial increase', though the project's 0.03 percent increase was found not to be substantial.

The Homewood and Heavenly projects each used a daily trip generation threshold of 200 trips as a significance threshold. Since both projects generated over 200 daily trips, impacts were found to be significant. Mitigation consisted of a fair share payment per Chapter 93 of TRPA Traffic and Air Quality Mitigation Program of the TRPA Code of Ordinances. These payments are used to support programs/improvements that reduce VMT, improve air quality, and encourage alternative forms of transportation. Both documents concluded that project impacts would be less than significant after mitigation.

The Boulder Bay project used a criterion of 1,150 VMT as a significance threshold, which was derived from the North Stateline Community Plan. Mitigation for exceeding this threshold consisted of a fair share payment per Chapter 93 of TRPA Traffic and Air Quality Mitigation Program of the TRPA Code of Ordinances with the conclusion that project impacts would be less than significant after mitigation.

Two recently completed EIRs for projects situated near, but outside of the Tahoe Basin, were also reviewed to determine how those documents treated the TRPA VMT threshold. The Coldstream Specific Plan EIR (Town of Truckee 2011) did not evaluate the significance of that project's VMT contribution to the Tahoe Basin. The Northstar Mountain Master Plan EIR (Placer County 2013) calculated the project's VMT contribution to the Tahoe Basin and concluded the impact would be less than significant because "the VMT resulting from project-level development is negligible and would not exceed the TRPA threshold."

In conclusion, the majority of EIR/EISs conducted within or in close proximity to the Tahoe Basin has included some level of discussion or analysis of the TRPA VMT threshold; however most of these projects were located in the Basin and, thus, were required to analyze Basin VMT and comply with TRPA standards. Two of the six studies applied the TRPA VMT threshold as a significance criterion. These other documents do not provide clear examples to assess whether the VSVSP's VMT contribution within the TRPA boundary would be significant since the contribution would represent a 1.2 percent increase over the existing summer weekday VMT (over the 0.03 percent increase considered less than significant in the Edgewood Lodge Document); however, the resulting VMT generated by the VSVSP would not exceed the TRPA VMT threshold (a threshold not used in any of the documents). Additionally, it is noted that a project fair share payment per Chapter 93 of TRPA Traffic and Air Quality Mitigation Program of the TRPA Code of Ordinances could result in 'double-paying' this fee if the other end of the trip within the Tahoe Basin (i.e., the in Basin destination for the VSVSP trip entering the Tahoe Basin) was already subject to this fee. In addition, Mitigation Measure 9-7 would generate permanent ongoing funding to expand transit services, including service between Squaw Valley and the Tahoe Basin, which would reduce VMT impacts of the project in the Basin. Lastly, it is noted that TRPA did not provide comments on the Notice of Preparation, nor provide a request that the VMT threshold be considered in the analysis.

TRANSIT SERVICE EXPANSION

Mitigation Measure 9-7 in the DEIR requires the applicant to contribute fair share funding or create a Community Service Area or Community Facilities District to help fund an increase in transit service. This mitigation measure describes the agencies involved (Placer County and Tahoe Area Regional Transit [TART]), obligations of the applicant (including specific operational improvements), and duration of responsibility. The project's Specific Plan also includes three policies (CP-2 through CP-4 on page 9-33 of DEIR) that are intended to enhance and supplement public transit, both within Olympic Valley and outside Olympic Valley. Policy CP-4 requires applicant participation in any plans to help expand regional transit services through financial support, such as subsidies and/or funding programs.

As indicated in the discussion of Impact 9-7 beginning on page 9-65 of the DEIR, ridership data were provided by Placer County for the TART SR 89 route for several winter days during the 2010-2011 ski season. This information is summarized in Table 9-17 in the DEIR and indicates that the majority of northbound morning ridership and southbound evening ridership is associated with drop-offs and pick-ups between Tahoe City and Squaw Valley. The information in Table 9-17 is based on available data from on-bus ridership surveys. Although this table does not show peak-hour, peak-direction ridership trends between Truckee and Squaw Valley; it is likely that similar travel patterns exist. In summary, peak-period, peak-direction TART buses appear to be close to capacity during peak winter ski days (e.g., the Saturday morning bus to Squaw Valley on February 26, 2011 required about one-third of riders to stand, and had a reserve capacity for only nine more riders). However, as stated on page 9-24, under existing conditions, "an additional bus is typically provided on the peak AM commute run on busy winter days to expand capacity." Therefore, a response to peak day demand is already in place. Continued addition of buses during peak periods may be an action funded through Mitigation Measure 9-7 to accommodate any increases in ridership generated by the VSVSP.

The specific type and levels of transit service enhancement that would occur will be developed and refined through implementation of Mitigation Measure 9-7. One evaluation of the VSVSP's anticipated fair share funding contribution indicates that it would be sufficient to provide one additional inbound bus arriving from Tahoe City and one additional bus arriving from Truckee during the Saturday Winter AM peak hour (with a comparable reverse afternoon trip). It is estimated, based on a review by the EIR traffic engineer, that this would result in the removal of 37 peak hour, peak-direction project-related vehicle trips that would otherwise drive to the Village (based on the bus capacity, and average vehicle occupancies of employees and skiers).

Several comments pertained to the concept of introducing shuttles that would transport both day-use skiers and overnight guests to/from the project and regional destinations. To understand the effectiveness, challenges, and benefits of such a program, a review of a similar effort is presented here.

In the winter of 2012-2013, the Truckee North Tahoe Transportation Management Association operated a free-fare skier shuttle program extending around the North Tahoe/Truckee region from Homewood to Squaw Valley to Truckee to Donner Summit to Northstar and to Incline Village. A total of 5 buses were used to operate at least two AM and two PM runs on all routes, over 44 peak weekend days and holidays. The ridership generated at the park-and-ride facilities was low. As an example, an agreement was made with the Tahoe Truckee Unified School District to allow free parking at the old Sierra Mountain Middle School site (just north of I-80 and west of SR 89 South). Direct service was provided to Squaw Valley, Alpine Meadows, Northstar, and the Donner Summit resorts. Despite a strong marketing effort, average daily ridership (boardings) at this location was only 1.3. A memo dated April 25, 2013 from LSC Transportation Consultants, Inc. to the North Lake Tahoe Resort Association includes the following conclusion (LSC 2013: 10):

> Setting these specific factors aside, it is realistic to conclude that the potential ridership under current conditions is limited. The low ridership is in part a reflection that the use of the private automobile for access to the ski resorts remains relatively convenient. Unlike some other mountain resorts, parking at North Tahoe ski areas is free to the skier. Except on the very busiest of days, parking is available at the North Tahoe resorts. Finally, while there is episodic traffic congestion on busy days, shifting from a private car to a bus service does not provide any travel time savings, as the region does not have any

HOV/bus lanes or "jump queue" lanes at intersections. As a result, skiers with ready access to a private vehicle have little incentive (in terms of monetary or time savings) to use a transit service, given the time needed to wait for the bus or use a park-and-ride.

In subsequent ski seasons, a more limited (two bus) skier shuttle program has been operated, focusing on connecting lodging properties with the ski base areas. Overall, however, the results of this experimental service indicate that simply providing enhance transit service to park-and-ride locations in the North Tahoe/Truckee region is not an effective means of reducing auto use.

EFFECTIVENESS OF MITIGATION MEASURE 9-1A (TRAFFIC MANAGEMENT ON SQUAW VALLEY ROAD)

Multiple commenters raised questions regarding the effectiveness of Mitigation Measure 9-1a (Traffic management on Squaw Valley Road). A key component of Mitigation Measure 9-1a is the creation of a predictive model, which can be used to forecast when the traffic management plan will need to be implemented. This will allow for adequate advance planning/staffing, thereby proper staffing levels that enable early-morning snow clearance along Squaw Valley Road, and placement of traffic control personnel. As such, the proposed traffic management plan would operate in a much more efficient manner than the current condition, in which three-lane coning is implemented in response "same-day" congestion subject to available staffing.

USE OF 2011-2012 SKI SEASON DATA TO REPRESENT EXISTING WINTER CONDITIONS

Multiple commenters raised questions regarding whether traffic counts from the 2011-2012 ski season used to support the DEIR traffic analysis are appropriate representations of existing conditions. This is important because the traffic counts set a baseline that contributes to the project impact evaluation. The following specific comments were made in various comment letters:

1. The 2011-2012 season was one of the driest in recent times and hardly representative of an average winter ski season.

2. Poor snow conditions in December 2011 and January 2012 contributed to a below average 2011-2012 season.

3. During an average ski year (which has not occurred in four years), the Christmas Holiday and Martin Luther King (MLK) weekend would be among the busiest, if not the busiest. The effect of this would be to cause what is shown as the busiest day in Table 9-1 to actually be in the top 5 or 10 days had there been decent snow during the Christmas Holiday and MLK weekend.

4. Since many skiers had already given up the 2011-2012 season as "lost," the Presidents Weekend counts were not representative of an average Presidents Weekend.

5. There could be as many as 30 days of overflowing traffic during a 'good season' including: Thanksgiving, Christmas Week, MLK Weekend, Presidents Weekend, Spring Break, and Easter Weekend.

6. Data that were collected in 2011-2012 should be scaled to create an average snowfall year.

7. Use of data from 2011-2012 underestimates the 5th busiest day of travel and underestimates the number of days that impacts will be significant and unavoidable.

Each of these above comments is addressed in sequence below. However, first, Table 3-8 has been prepared to summarize snowfall at the Squaw Valley Ski Resort from the 2008-2009 through 2014-2015 ski seasons using the same online reference as identified in comment I268-2.

Table 3-8 Reported Snowfall at Squaw Valley Ski Resort From 2008-2009 through 2014-2015 Seasons

Ski Season	Snowfall (inches)				Maximum Base Depth (inches)
	Total for Season	Total in December & January	December 24 – 31 (Christmas Week)	February 13 – 20 (Range of Presidents Day Weekends)	
2014-2015	193	88	7	0	34
2013-2014	273	39	0	5	34
2012-2013	307	156	77	6	68
2011-2012	394	86	0	13	63
2010-2011	815	211	46	120	265
2009-2010	480	236	15	0	225
2008-2009	427	191	63	36	175
Average	413	144	30	26	123
Median	394	156	15	6	68
2011-2012 Season	394	86	0	13	63

Source: On the Snow 2015

Response to Item #1

According to the above table, the total snowfall of 394 inches during the 2011-2012 season was five percent less than the average total snowfall of 413 inches for the seven seasons from 2008-2009 to 2014-2015. This suggests that the 2011-2012 was quite typical in terms of annual snowfall. In fact, of the seven years of snowfall totals in this table, the 2011-2012 ski season represented the median (or 50th percentile) of snowfall totals. Thus, the snowfall data does not support an assertion that 2011-2012 was "one of the driest in recent times."

Response to Item #2

According to the above table, the December and January months of the 2011-2012 ski season received 86 inches of snowfall, which is much less than the 144-inch average over the 7-year period. The comment asserts that conditions during these two months contributed to the "overall below average season in 2011-2012." As noted in response #1 above, the overall 2011-2012 ski season represented the median (or 50th percentile) of snowfall totals of the 7-year period. Hence, despite below average snowfall during these two months, snowfall during the overall 2011-2012 season was typical or average.

If the comment is referring to annual ski/board days at the Squaw Valley Ski Resort, then this point is valid, on a season-long basis, according to Table 9-1 of the DEIR, which shows about 560,000 skiers at Squaw Valley during the 2011-2012 season, which is less than the 713,000 skiers during the 2010-2011 season and 650,000 skiers during the 2012-2013 season. However, this table also notes that the fifth busiest day of the 2011-2012 season accommodated 11,367 skiers, which is greater than the fifth busiest day of the other two seasons (i.e., fifth busiest day of 2010-2011 season served 11,103 skiers and fifth busiest day of 2012-2013 season served 10,738 skiers). Thus, while it is acknowledged that conditions in December and January during the 2011-2012 season were below average for those months, there is no evidence to suggest that this caused the busiest ski days (upon which existing conditions are based) of the 2011-2012 ski season to lower than peak days in busier years.

Response to Item #3

According to the above table, the months of December and January during the 2010-2011 season received 150 percent more snowfall than the 2011-2012 season. According to this comment, it would be expected that the 2010-2011 season would therefore also include several days during the Christmas Break that fall

within the top 5 or 10 busiest ski days of the year (given significant snowfall during that period). According to skier data provided by Squaw Valley USA, December 30, 2010 was the only Christmas Break day to have a greater level of skier attendance than the 5th busiest day of the 2010-2011 season, which occurred on February 21, 2011. Thus, the actual skier data do not support the assertion made in this comment. Thus, while this response does not directly refute the assertion that Christmas Break skier levels are amongst the highest of the year, it does establish that even during heavier snowfalls during December and January, the 5th busiest day of the year tends to occur later in the ski season as was studied in the DEIR.

Response to Item #4

There is no evidence to suggest that skiers during the 2011-2012 season "gave up on the season as lost." In fact, following the Presidents Day Weekend in 2012, the remainder of the season (which extended to April 22, 2012) accommodated 330,000 total skier days according to skier data provided by Squaw Valley USA. In contrast, the remainder of the 2010-2011 season after Presidents' Day Weekend (which extended to April 30, 2011) accommodated 277,000 total skier days. This would suggest that large snowfall on the Presidents Day Weekend in 2012 may have actually accommodated a "pent up demand" for skiing or boarding, as evidenced by the 19 percent increase in total skiers/boarders during the remainder of the season.

Response to Item #5

The comment is valid in that during a "good season" in which significant snowfall occurs in December and January, many of the busier days of the season occur during these months. This is precisely what occurred during the 2010-2011 season, which experienced 211 inches of snowfall in December and January (second highest among the seven seasons that were studied). During this season, 16 of the 30 busiest ski attendance days occurred during those 2 months. However, any assertion that the 30th busiest day would be nearly as busy as the fifth or tenth busiest day is not supported by either Squaw Valley Road ADT counts or the Squaw Valley USA Ski Resort skier/boarder attendance totals. For instance, the 30th busiest ski day during the 2010-2011 season had only 55 percent of the skier attendance of the peak day. During the 2011-2012 season, the 30th busiest day had only 41 percent of the skier attendance of the peak day. Therefore, an assertion that the existing Saturday Winter AM peak hour and Sunday Winter PM peak hour conditions reported in the DEIR could occur as many as 30 times during a good snow season is not supported by the available data.

Response to Item #6

The scenario analyzed in the DEIR consists of the approximately 5th busiest day of the winter ski season. The 2011-2012 season experienced five percent less annual snowfall than the 7-year average. The 5th busiest day in the 2011-2012 season had 11, 367 skiers/riders, which is approximately 2.3 percent greater than the number of the 5th highest day (11,105 skiers/boarders) of the 2010-2011 season, which had the highest total snowfall of the seven years that were studied.

A literal interpretation of this comment would suggest that background conditions should be increased about five percent to reflect poor snow conditions. Had such an adjustment been made, none of the study conclusions would have meaningfully changed. Winter peak hour and daily conditions along Squaw Valley Road are already unacceptable and would have shown slightly exacerbated conditions. More importantly, as stated above, the analysis focuses on the 5th highest day. Slight overall changes in the annual season snowfall and skier days would not affect this peak day 'design condition'.

Response to Item #7

The responses provided here have confirmed that the data from the 2011-2012 ski season provides an accurate depiction of conditions during approximately the fifth busiest day of a typical winter ski season.

3.1.3 Master Response: Traffic Issues at Squaw Valley Road and Squaw Peak Road

Multiple commenters noted that as they enter Squaw Peak Road from Squaw Valley Road they have frequently observed potential safety issues due to skiers walking in the middle of the street to the Tram from their cars, delivery trucks maneuvering into the Tram loading dock, and day skiers stopping at the Tram curb to load and unload. The commenters express concern that existing perceived safety and traffic congestion issues in this area will only get worse with the proposed project and the addition of hundreds of new homeowners and skiers. The commenters note that there is not a mention of this impact in the DEIR.

Although the DEIR does not specifically evaluate skier foot traffic and Tram building delivery trucks on the segment of Squaw Peak Road identified in the comments, the VSVSP includes various elements that would improve the safety and traffic congestion concerns expressed by the commenters.

The location for the proposed parking structure at Lot 12 is currently a surface parking lot, with no features limiting pedestrian access to Squaw Valley Road to the west. With project implementation, the parking structure at Lot 12 (both surface and upper level) would have walls limiting pedestrian access to the west, and would be designed to provide defined and safe pedestrian routes directing pedestrians to the south into the Intrawest Village plaza. This condition would reroute a considerable amount of pedestrian traffic heading to the Tram or Funitel through the plaza instead of along Squaw Valley Road, thereby reducing uncontrolled pedestrian traffic on Squaw Peak Road relative to existing conditions. Some pedestrians would nonetheless continue to proceed to the Village by walking south on Squaw Valley Road. The project includes construction of a new eight-foot-wide sidewalk along the east side of Squaw Valley Road where no sidewalk currently exists, which would substantially reduce circulation conflicts between pedestrians and vehicles that currently occur, in part, due to inadequate pedestrian facilities along this portion of Squaw Valley Road. Additionally, the project applicant has retained a land use planning firm to help define a potential solution for the relocation and/or recirculation of valet parking so as to reduce the congestion of vehicles dropping off and unloading at the Squaw Valley Road/Squaw Peak Way intersection. Depending on the results of this planning effort, pedestrian and vehicle traffic flow effects from skier drop-off/pick-up in the area in question could be further improved relative to existing conditions.

With project implementation, shipments/deliveries, inclusive of those for the Tram building, would be unloaded at the East Parcel shipping and receiving facility (see description of this facility on page 3-13 of Chapter 3, “Project Description,” of the DEIR). This proposed facility would be the primary facility that would receive, sort, hold, and consolidate deliveries, then distribute the deliveries throughout the resort via smaller, cleaner, and less intrusive delivery vehicles compared to typical delivery trucks. Rather than multiple trucks from different delivery services and merchants making individual deliveries at the Tram building loading dock, these delivery services and merchants would drop off materials at the East Parcel shipping and receiving facility, and trucks operated by Squaw Valley Real Estate would then deliver the materials to the Tram building loading dock. This arrangement would also allow the project applicant to manage the timing of deliveries to the Tram building loading dock, focusing delivery times on non-peak traffic/activity periods.

It should also be noted that the proposed project would not result in new land uses along Squaw Peak Road that would generate additional traffic volumes along this roadway. Changes along this roadway are proposed to be limited to recreational access improvements, which would not noticeably change traffic activity during key traffic periods.

Based on the design features and conditions described above, project implementation would likely reduce the pedestrian and delivery truck conflicts on Squaw Peak Road identified by the commenters.

3.1.4 Master Response: Visual Impact Analysis

Multiple comments expressed general concerns related to the visual character of the proposed development and the methods used in the DEIR to evaluate the potential for project-related effects on visual resources. Specifically, many comments stated that the proposed buildings would be too tall and too close together, and offered alternative configurations for the central plaza. Other comments questioned the viewer groups used in the impact analysis. The following discussion responds to these concerns.

The project would replace the parking lots and existing scattered structures with multi-story condominiums/hotels, the MAC, other buildings, and parking structures. Some existing buildings (e.g., existing Intrawest Village condominiums, snow making facilities, lift service facilities and Red Wolf Timeshare) would be blocked in some views by the project (as shown in simulated views for Viewpoints 4 and 6 in Exhibits 8-12 and 8-14 and described on page 8-48 of the DEIR). This would result in increased prominence of structures in foreground views from Squaw Valley Road and areas to the east (meadow and golf course). These new buildings would be designed and constructed in accordance with the Appendix B Development Standards and Design Guidelines and would present a more unified built environment than present views of structures at the site.

The analysis of aesthetic effects is, by nature, qualitative. It is not possible to address the nuanced opinions of every potential viewer through the CEQA process. As established on page 8-1 of the DEIR:

> Visual changes and whether they are considered adverse are highly subjective. One person may conclude that any change in a pleasing visual setting is adverse. Others may find the same changes to be acceptable or even an improvement. Further, there are few formal tools available to evaluate changes to the visual environment and conclude significance.

For the purpose of this evaluation, viewer groups were defined to aid in the analysis. The approach identifies residents of the Valley as being more sensitive to changes in visual conditions, compared to potential visitors, in part because it was presumed that residences would see existing views and changed views on a regular and frequent basis. This is not intended to discount the impressions of occasional or even regular visitors to the Valley; they too may be sensitive to changes. However, those people who have lived in the Valley for some time or who would spend significant time there are more likely to be adversely affected by the extent of change associated with construction and completion of the project.

VIEWER GROUPS

A number of comments expressed concern that the DEIR discounted the visual effect of the project as experienced by occasional visitors, because more weight was given to the visual sensitivity of residents. The analysis in no way contends that, because many viewers would be occasional visitors, they would not be sensitive to changes in the viewshed. Rather, the analysis identifies the range of viewers that exist on a spectrum defined, generally, with occasional visitors on one end and long-time Valley residents on the other. Impact 8-1 concludes that the viewshed changes would likely be less than significant to the overall visitor user group, which includes first time visitors without past knowledge of the property that would experience the viewshed as if project buildings had always been in place, infrequent visitors who may have different impressions of the presence of project features, as well as frequent and regular visitors with an expectation of views consistent with existing conditions. The determination of impact significance for Impact 8-1 is based, in large part, on the effects on residents; that is, the viewer group to which the effect is anticipated to be most noticeable and persistent, because they are more familiar with the view of existing conditions and would have more occasion to see the changes resulting from the project. Part-time residents of the Valley and season pass holders may consider themselves in this group, and their perceived impact of the project may be similar to full-time residents. The DEIR simply acknowledges that the visual impact may be different to those who more frequently and regularly see a change than to visitors who see the Valley and project together infrequently, rarely, or for the first time.

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

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

BUILDING HEIGHT AND DENSITY

Proposed building heights are described in Chapter 3, "Project Description," of the DEIR and evaluated throughout the analysis. These building attributes are subject to restrictions in the SVGPLUO, which are summarized in Chapter 8, "Visual Resources," of the DEIR. As indicated on pages 8-44 through 8-45 of the DEIR, Section 220.16 of the SVGPLUO does not establish specific height limitations for the Village Commercial zone, but height limits are set for developments through the County's design review process, as discussed below.

The applicant's proposed Village at Squaw Valley Specific Plan Development Standards and Design Guidelines (VSVSP DSDG), which is Appendix B to the VSVSP, includes proposed building height limitations that would be followed if the project is approved. Although the DEIR does not list the specific requirements of the VSVSP DSDG, the DSDG encourages buildings of varying heights and setbacks from adjacent buildings. As described in the April 2015 VSVSP DSDG (the version used to support the DEIR analysis), implementation of development standards for structures in the Commercial Core on the project site to the immediate east of the Intrawest Village, for example, would result in a structure with variable roof heights between 72 feet and 108 feet. The Intrawest Village includes existing buildings which vary in height between approximately 60 and 70 feet, with chimneys and decorative towers between 70 and 80 feet on some structures. The Resort at Squaw Creek, which is located approximately 0.5 mile to the east of the main Village area, includes a 405-room, 108-foot-tall, multi-story hotel structure (see page 8-9 of the DEIR). Proposed structure heights varying between 72 feet and 108 feet would provide for heights similar to buildings already in place in the Valley, and the varying heights (rather than a block of buildings at only one height) would provide more visual interest.

As shown in the various visual simulations, except for views where buildings are in the foreground of the viewshed (see Viewpoints 9, 10, and 11 in Exhibits 8-17, 8-18, and 8-19 of the DEIR), the overall heights of buildings are less important in terms of view blockage than the mass and density of buildings. For instance, as shown in Exhibit 8-14 (Viewpoint 6), the lower part of the viewshed is "filled in" by project buildings, which block views of the lower slopes, but not of the mid to higher slopes and mountain peaks. If the project buildings were not as tall—if they were 20 percent shorter—it is likely that the impact would be nearly identical because the lower part of the viewshed would still be substantially blocked while the areas above the lower slopes would be visible. Where buildings are located in the foreground of the viewshed, heights play a more important role in terms of view blockage. In this instance, lowering of building heights would result in less viewshed blockage, because parts of the slope may be visible if the building heights were lowered. Thus, the issue of building heights plays an important role in the views from existing development

at the Village, such as from the Intrawest development, whereas mass and density is more important in the viewshed impacts from more distant views of the project and background.

Pursuant to Mitigation Measure 8-2b, the project applicant would be required to obtain Design Review approval from the Placer County Design/Site Review Committee (D/SRC). This review process entails submitting plans and other information to Placer County Planning Services Division. Information to be reviewed and approved by the County includes: location and use of existing and proposed structures; setbacks from property lines; exterior building elevations for all sides of proposed buildings; parking and circulation improvements; recreation improvements; exterior lighting plans, including location, height, wattage, and type of fixture for freestanding lights, and location and types of fixture for building lights; and the relationship of proposed buildings to all other structures within 100 feet including height of adjacent buildings located within 100 feet of proposed buildings. The purpose of subjecting plans to the D/SRC is to provide a mechanism through which the County can require the applicant to meet the requirements of the VSVSP DSDG before construction is permitted.

Several comments suggested that mitigation reducing the height of structures would reduce perceived impacts related to community character, light pollution, and shading. A Reduced Building Heights alternative was evaluated in the DEIR (see Section 17.2.8, page 17-12 of the DEIR). Based on this evaluation, reducing the maximum building height to conform to the existing Intrawest Village (i.e., 75 feet) would result in a larger building footprint to facilitate the development of a comparable number of units and bedrooms. Thus, visual impacts may be greater because the development footprint would be larger, the ability to maintain view corridors by managing the width and orientation of spaces between buildings would be diminished, and complete blockages of views from some vantage points would not be avoided. Further, more properties in the vicinity of the project area would be adversely affected by the viewshed impacts (whereas the proposed project better limits viewshed impacts to a smaller area). Residents north of the project site that are “uphill” would see shorter buildings than under the proposed project; however, those who are less than 75 feet above the project site would see a more uniform and massive/unvaried set of buildings than the project.

The DEIR analysis determined that this alternative would not reduce or avoid significant impacts related to development of the Valley, in general, or obstruction of views. This alternative would not meet the project objectives related to providing a compact development that minimizes the overall resort footprint and minimizes reliance on the automobile for movement in and out of the plan area and within the plan area.

However, as described in Section 2.1, “Project Modifications,” of this FEIR since publication of the DEIR, the project applicant has proposed several modifications to the proposed project, including reducing the height of several buildings and wings of buildings in the Village Core and the Village Neighborhood, and increasing setbacks between buildings in the Village Core thereby increasing the total area of outdoor plaza that would be developed.

IMPACTS TO SCENIC VISTAS AND CHANGE IN CHARACTER

Surface parking lots and existing structures of various styles dominate the foreground from most public access points under current conditions, and define the character of the main Village area. Maintenance and infrastructure buildings, such as the Red Dog mountain maintenance buildings located to the east of the existing Village, are part of the viewscape with lodging and resort-oriented gathering places. There is a dispersed land use pattern, and buildings are connected by ample asphalt parking and roadways. The current viewshed presents a jumble of building styles and types, and a vast expanse of asphalt paving that, depending on location, dominates the foreground.

The project would add structures with mountain-village type architecture to an area that is largely paved and developed, and is adjacent to other resort buildings. Implementation of the VSVSP DSDG would result in a unified architectural style for all structures, replacing or blocking from view current structures that lack architectural unity and detract from existing views. In addition, the VSVSP DSDG requires landscaping through the main Village area to screen the lower portions of structures and as part of the Squaw Creek

restoration. With implementation of the proposed project, the project site would become more similar to the character of the adjacent resort area. This is not considered to result in a substantial adverse change in the visual character (see page 8-53 of the DEIR) of the built environment because the visual appearance of the existing resort facilities—in contrast to effects on the overall viewshed—would be enhanced by the more consistent architectural style. Existing overhead utilities would be undergrounded, maintenance buildings of poor architectural quality would be removed, and asphalt pavement would be replaced with buildings that display architectural integrity. These changes would substantially reduce the amount of incongruous features that detract from the quality of the built resort environment visual setting and arguably would substantially improve the visual quality of the resort.

Although the project may improve the appearance of the built environment and the mountain peaks surrounding the resort would remain the primary point of visual interest, the number and size of structures in the main Village area would increase the visibility of the built environment and would obscure the lower slopes of the mountain. Due to these changes, the DEIR concludes that there would be a significant and unavoidable impact on scenic vistas (i.e., the overall view of the site from Squaw Valley Road).

NIGHT SKY VIEWS/LIGHT POLLUTION

The DEIR concludes that residents and visitors may consider any new light, though designed to mitigate potential sky glow to the extent feasible, an adverse change in nighttime views of the area. This effect would be experienced by both individuals in the immediate area and those in nearby areas (such as Alpine Meadows and the Granite Chief Wilderness area). Baseline information, including existing sources of light in the area, are described in Section 8.1.4, “Light and Glare Conditions,” of the DEIR as part of the discussion of the environmental setting. The existing conditions on the project site include illuminated buildings, roads, and parking areas on the Valley floor.

In the summer, the existing nighttime illumination at Squaw Valley is concentrated on the parking areas, particularly near the areas of existing retail use. The sky is generally darker to the north of the Village than to the south, but there is no visible glow emitted from the Alpine Meadows area. The existing signs (such as the marque for the gondola) are visible, but not remarkably bright. Light glow is produced by the parking areas and at the intersection of Squaw Valley Road and SR 89. The stars of the Big Dipper and Milky Way are apparent from vantage points around the Valley. From Alpine Meadows, the sky is faintly brighter towards Squaw Valley, but the sky is generally dark enough that stars are clearly visible.

In the winter, night skiing at Squaw Valley requires extensive lighting on the slopes, which contributes to sky glow conditions in the area (see page 8-39 of the DEIR). The 3.2-mile Mountain Run is used for night skiing, and is illuminated by a specially-made floodlight system that utilizes 1000-watt, color-corrected high-pressure sodium bulbs, which are designed for superior contrast and easier vision on the snow. Light pollution is diffuse and the existing condition of the night sky is the product of cumulative contributions throughout Squaw Valley. Beyond the existing Village and resort activities, such as night skiing, there are other accommodations in the area (e.g., The Resort at Squaw Creek) and hundreds of homes on the north side of Squaw Valley Road that may also be contributing to existing sky glow. Many of these existing sources of light do not employ the most modern lighting methods (e.g., shielded light fixtures).

The DEIR evaluates the potential for the project to produce new sources of nighttime lighting that would affect night sky views. As with other aspects of the analysis of potential visual effects, guidelines have been promoted by some organizations, such as the International Dark Skies Association, that provide a methodology for addressing light and glare impacts, but no state or local regulations require application of this methodology.

The project would be consistent with the Appendix B, “Development Standards and Design Guidelines,” of the VSVSP, which include a Master Lighting Plan. As described on pages B-88 through B-94, these standards address light and glare impacts by committing to measures related to shielding, spectrum, and quantity of light. Specific requirements include shielding outdoor lighting, use of full cut-off luminaries for street lighting

and parking lot lighting, use of energy-saving and warm-toned lamps, and a list of prohibited lighting types. These guidelines meet or exceed Placer County's requirements.

Rather than rely on the Dark Skies criteria to make a determination about whether or not the project would have a significant effect, the approach taken in the DEIR conservatively assumes that adding light sources would be a significant and unavoidable change to the current condition, and that compliance with established codes and standards is not sufficient to dismiss potential impacts. CEQA establishes that "public agencies should not approve projects as proposed if there are…feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects…" (Public Resources Code [PRC] Section 21002). Therefore, beyond the requirements of the VSVSP, the DEIR establishes Mitigation Measure 8-5b, which requires that a detailed lighting and photometric plan would be developed and submitted to DRC for approval that would, among other requirements:

- Show streetlights designed in accordance with the Caltrans Traffic Manual and Standard Plans and installed to the satisfaction of the Department of Public Works. Streetlights shall be of a type, height, and design to direct lighting downward, shielding, to the greatest extent practical, light exposure beyond that needed for proper intersection lighting. Streetlights shall not exceed the minimum number required by the Department of Public Works unless otherwise approved by the DRC. Street lighting would be kept to a minimum and full cut off luminaires shall be used. Streetlights lighting vehicular and pedestrian access ways at key intersections where safety is a concern would be no more than 30 feet tall, and in the commercial core streetlights would be no more than 20 feet tall. Parking lots would be lit, but would allow gaps in lighting.

- Include building lighting that is shielded and directed downward, such that the bulb or ballast is not visible. Lighting fixture design shall complement the building colors and materials and shall be used to light entries, soffits, covered walkways and pedestrian areas such as plazas. Roof and wall pack lighting shall not be used. Lighting intensity shall be of a level that only highlights the adjacent building area and ground area and shall not impose glare on any pedestrian or vehicular traffic.

The DEIR provides sufficient information for decision makers to understand the potential changes in the lighting of the property, potential on- and offsite effects, and measures that can be reasonably implemented to reduce the ill-effects of such lighting. CEQA does not require detailed analysis of every potential source of light on the property, quantification of light production, or use of any particular methodology in conducting the analysis. To the extent this information is required during design review, it would be provided to the D/SRC. The D/SRC would make the determination of whether the specific components of the project meet the intent and standards contained within existing DSDG and the above mitigation. This evaluation is separate from the CEQA determination, which is a qualitative determination of whether the project would "adversely affect day or nighttime views in the area" by creating a "new source of substantial light or glare."

Project implementation would result in an increase in the number and density of buildings. This would result in more sources of illumination. However, because the proposed development would include modern lighting and shielding techniques, buildings and parking areas of similar massing as existing structures would be expected to generate less light trespass on a building-by-building basis. The effect on night sky views and contribution to light pollution in the area would not be substantially more than the current development.

The design guidelines and compliance with Placer County codes would keep lighting to the minimum necessary to provide for safety. The required actions include feasible, generally accepted methods of reducing light pollution. Potential light pollution would be further mitigated with implementation of Mitigation Measure 8-5b. However, because reduction of all visible light is not feasible, this impact would remain significant and unavoidable for the main Village area, as described in the DEIR.

ANALYSIS OF SHADOWING

The DEIR evaluates the effects of shade on existing, off-site uses. The evaluation is based a shadow study that used 3-dimensional modeling of the structures proposed in the VSVSP, as well as existing buildings, topography, and the angle of the sun, to project the shadows that would be cast by the new development. A series of three times of day (9:00 a.m., 12:00 p.m., and 3:00 p.m.) were modeled for the spring equinox, and for the summer and winter solstices. The result of this modeling effort is provided in Appendix F of the DEIR.

The shadow analysis and corresponding evaluation were conducted in response to comments received during the CEQA scoping period. At that time, comments expressed concern about shading of existing residences and creation of pedestrian hazards due to shade-induced ice formation on pedestrian pathways. The analysis focused on potential shadows during the winter, when the sun is lowest and shading could result in cooling at a time when the outdoor temperature is already low. A threshold was developed for the DEIR related to whether the project would create additional shadowing on existing structures or facilities during a substantial portion of the day.

The DEIR concluded that the project's impacts on existing structures and facilities located on adjacent properties due to shadowing would be less than significant because the shadows cast by the proposed structures would have minimal effect on existing gathering places. During the spring, summer, and fall, the project would result in shading on the southeast corner of the easternmost Intrawest building during the morning. Although benches and walkways would be affected, this small area is not a formal gathering place where visitors spend extended periods of time. The project, as well as all existing structures, would cast longer shadows on winter mornings; however, because the south side of the Valley is in the mountain's shadow during the winter under existing conditions and all outdoor public gathering spaces are currently shaded, there would not be a substantial change to existing conditions.

Several comments received on the DEIR pertain to the potential for the project to create internal shadowing, which is a circumstance that was not evaluated under the threshold used in the DEIR. According to the Shadow Study provided as Appendix F to the DEIR, portions of the central courtyard (Lot 33, which is a key gathering space proposed by the project) would be shaded during all times of the year except mid-day during the summer. During the summer, spring, and fall, in particular, a mix of sun and shade would provide individual recreationalists the opportunity to choose the level of sun exposure most comfortable to them. During the winter, when most individuals are assumed to prefer sunny areas over shade, the modeling indicates that the area is already in the shadow of the mountain peaks in the morning and evening. At noon, the proposed structures would shade most of the central courtyard. As discussed above, the project would be consistent with Appendix B, "Development Standards and Design Guidelines," of the VSVSP, which encourage designs that minimize shadows cast on outdoor gathering areas or residential buildings, especially in winter, through established architectural design objectives. Consistency with the DSDG would be ensured through the Design Review approval conducted by the D/SRC. In addition, as described in Section 2.1, "Project Modifications," of this FEIR, the applicant has proposed several modifications to the project since publication of the DEIR, including modifying the design of the central courtyard to increase the main courtyard's overall size and to require greater separation between buildings while also requiring stepdowns on adjacent building wings, all of which would reduce the potential for internal shadows. In addition, a design standard has been added to the VSVSP that requires developers to provide accurate shadow analyses as actual buildings are proposed as part of the design review process.

While it is recognized that areas that receive greater amounts of shade in winter time are more likely to experience increased ice formation (e.g., pedestrian pathways), this is not considered to be a potentially significant adverse impact on the physical environment under CEQA (CEQA Guidelines Sections 15360 and 15382). In addition, while small isolated outdoor areas within the village would experience shade and shadows during a majority of the year, these small outdoor areas would not be expected to result in dangerous ice formation because the village would have daily snow removal and snow management, consistent with current practices within the Intrawest Village, which would reduce the amount of snow and ice buildup on pedestrian pathways.

3.1.5 Master Response: Noise

Many comments were received pertaining to both the construction and operational noise (stationary and traffic-related) analysis in the DEIR. Comments regarding construction and operations are discussed separately below.

CONSTRUCTION NOISE

Construction noise-related comments expressed concern about noise affecting areas surrounding the project site, the extended construction period and allowable construction hours, nighttime construction noise, and the adequacy/completeness of the construction noise analysis (Impacts 11-1 and 11-2) and level of mitigation recommended in the DEIR. Each topic is addressed herein.

Construction Noise in Surrounding Areas

Comments were received regarding the effects of construction-related noise on surrounding areas such as Alpine Meadows, the Granite Chief Wilderness area, and the Pacific Crest Trail (PCT). Alpine Meadows and the Granite Chief Wilderness area and associated trails located approximately 1.5 miles (approximately 8,000 feet) south of the project site at their closest points. The PCT is located approximately 2.5 miles (13,000 feet) west of the project site.

Construction noise is typically considered a localized impact as noise would generally be greatest at the areas immediately adjacent to the noise-generating activities, and would decrease substantially with distance from the noise source. For example, estimated daytime construction noise of 93.6 dBA L_{eq} (hourly average) and 97.7 dBA L_{max} (instantaneous maximum) at 50 feet from the center of construction activities would attenuate, from distance alone, to below Placer County thresholds of 55 dBA L_{eq} and 70 dBA L_{max} at distances beyond 4,250 feet (approximately 0.8 mile) assuming no noise attenuation from variations in ground surface elevation or physical interference from topography, structures, or vegetation. During the proposed nighttime construction activities, noise levels would exceed applicable Placer County nighttime noise standards at sensitive receptors within 2,500 feet of construction activities. As such, the DEIR analysis focused on sensitive receptors within these distances from proposed construction areas. The trails and wilderness areas mentioned above are well beyond the distances for which construction noise could exceed Placer County standards and, therefore, contribute to a substantial temporary or periodic increase in perceptible ambient noise levels. Mitigation has also been included in the DEIR, as revised in the FEIR, which further reduces construction-related noise impacts at sensitive receptors (as discussed below).

Overall Construction Period

The overall duration of construction activities has been disclosed and comprehensively evaluated in the DEIR. Comments expressed that the 25-year length of construction is unacceptable and that a lower density project with a shorter construction period should be considered. These issues are addressed by the Master Response regarding the 25-year construction period and the Master Response regarding the Reduced Density Alternative, respectively.

Construction Hours

Many comments suggest that the allowable hours of construction and associated construction truck trips should be reduced even further from what Placer County currently allows. Reducing the allowable construction hours would be a tradeoff: noise would be generated over a shorter period during the day, but the overall construction timeframe would be extended in duration to make up for shorter construction days, thus prolonging noise generated from construction. Given that the length of the construction timeframe is also a primary concern raised by commenters, this type of mitigation, resulting in elongating the overall construction timeframe, would likely be perceived as being of questionable benefit to some members of the community. However, this tradeoff may be considered by the Placer County Board of Supervisors in deliberations over project approval. In any event, changing the construction hours (and thereby extending the construction timeframe) would not alter the significance of the impact. Due to the length of the

construction period, off and on over 25 years, construction noise would remain significant and unavoidable, as described on page 11-21 of the DEIR. If Placer County altered the construction hours, it would treat the proposed project differently from other construction projects in the county. It should be noted that Placer County has additional means (i.e., an Administrative Review Permit) to regulate construction noise that is proposed outside of the allowable hours. These details are further explained below.

Nighttime Construction Activities and Noise

The issue of nighttime construction noise was raised by several commenters. Specific comments state that nighttime construction should not be allowed, additional restrictions on nighttime construction should be enforced, and that nighttime construction would result in a significant impact no matter how long impacts occur.

In general, the comments are in line with the conclusions of the DEIR, as described in the Master Response regarding the 25-year construction period. The DEIR concluded that nighttime construction would result in noise levels that would be considered a significant impact, and mitigation is provided in the DEIR. (DEIR pages 11-20 through 11-24.) However, as described in the DEIR, the use of nighttime construction would be the exception not the rule. Nighttime construction would only occur as a necessity, such as during concrete pours that require continuous work until completed, or to protect the construction site and buildings from anticipated storms. These would be relatively rare occurrences, expected for only a few days per construction year, and would not occur during every construction year. Further, mitigation has been incorporated into the DEIR to include noise curtains for construction activity in close proximity to existing receptors during nighttime construction (see Mitigation Measure 11-1b), which would lessen construction noise levels at sensitive receptors.

In addition to the mitigation measures included in the DEIR, further review by Placer County would be required for any construction activities proposed to occur outside of the allowable timeframes (i.e., 8:00 p.m. to 6:00 a.m. Monday through Friday, 8:00 p.m. to 8:00 a.m. Saturday and Sunday). Per Placer County Noise Ordinance Section 9.36.080, an exemption from Placer County noise standards must be requested by the project applicant and approved by the County. If proposed and approved, the County will require the applicant to implement all available sound suppression techniques for the construction-related activities to be performed and provide adequate consideration and notice to any existing residence that may be affected. Under this scenario, should it occur, Placer County would review all applications and issue an Administrative Review Permit for proposed nighttime construction, only if all conditions, including those required by ordinance, are met. The permit may include conditions or requirements to minimize public detriment and may include restrictions on sound levels, sound duration and operating hours, and an approved method for achieving compliance with said conditions. In combination with the mitigation measures included in the DEIR and the County review process that must be completed to approve nighttime construction, impacts would be minimized to the maximum extent feasible, but would still be considered significant and unavoidable, as described on pages 11-21 through 11-24 of the DEIR.

Construction Noise Analysis Scope and Mitigation

Several comments claim that the construction analysis was not quantitative, did not address impacts to all receptors, and did not substantiate the effectiveness of the proposed construction mitigation.

Contrary to the comment, elements of the construction noise analysis were quantitative, as indicated in the "Impact Analysis Methodology" section of Chapter 11, "Noise," of the DEIR (see pages 11-16 and 11-17), which states:

> To assess potential short-term (construction-related) noise and vibration impacts, sensitive receptors and their relative exposure were identified. Project-generated construction source noise and vibration levels were determined based on methodologies, reference emission levels, and usage factors from FTA's Guide on Transit Noise and Vibration Impact Assessment methodology (FTA 2006) and FHWA's Roadway Construction Noise Model User's Guide (FHWA 2006). Reference levels are

> noise and vibration emissions for specific equipment or activity types that are well documented and the usage thereof common practice in the field of acoustics.

Additional comments claim that the level of detail in the construction and vibration analysis was not adequate. See page 11-19 of the DEIR. The noise analysis in the DEIR was conducted at an appropriate level of detail (i.e., programmatic) based on the type of project (i.e., specific plan) being proposed. This is discussed further in this FEIR, in the response to comment 09-59, which discusses the programmatic nature of the DEIR.

Consistent with the programmatic nature of the EIR, the construction noise analysis considered a wide range of construction activities that could potentially occur over all phases of construction during the anticipated 25-year construction period. The analysis utilized accepted industry-wide methods, as described above, and reference noise levels to quantify potential construction-related noise levels based on the best available information. The noise analysis was conservative in that it assumed that all potential construction activities and types of equipment (e.g., grading, demolition, site preparation, and building construction) would occur at the same location and time on the project site in a concentrated (high noise-producing) manner. This is the worst-case potential noise generating scenario. Further, the analysis considered all existing and potential future sensitive receptors that could be exposed to the quantified noise levels (see Impacts 11-1 through 11-5 in the DEIR and Appendix I to the DEIR).

Consistent with the programmatic level of detail and the fact that construction activities would occur at various levels of intensity and location over the life of construction, it would not be practical, and would require a great deal of speculation, to identify specific noise levels for every single receptor as some comments suggest. Rather, it is more useful to attempt to quantify and disclose the most likely range of impacts that could occur based on the best available information at the time of the analysis. This is precisely what was done for the construction noise and vibration analysis in the DEIR. All potential noise sources (e.g., equipment type, construction activities, blasting, etc.) were considered and a maximum and average noise level for each were quantified and disclosed. Programmatic mitigation is provided based on performance factors, such as the distance of a sensitive land use from construction activities.

While identified as a sensitive receptor in the DEIR text, the analysis of construction noise did not list the Squaw Valley Academy, a boarding school near the East Parcel site, in its discussion of effects due to its location of approximately 1.5 miles to the east of the primary construction location. However, in response, both the text of the impact analysis and measures to mitigate noise to this sensitive use are modified, as follows.

The third full paragraph on page 11-19 of the DEIR is revised as follows to reflect that the Academy would also be affected by construction noise:

> Existing sensitive receptors that would be exposed to construction-noise include lodging units at the Intrawest Village and Red Wolf Lodge, The Olympic Village Inn, Squaw Valley Chapel, Squaw Valley Lodge, and other scattered residences located around the project site, such as the residences on Indian Trail Court adjacent to the East Parcel, the Tavern Inn Condominiums located at Squaw Valley Road and Tavern Way, and the Squaw Valley Academy across Squaw Valley Road from the East Parcel (approximately 250 feet between the closest academy buildings and construction activities). Construction activity (e.g., demolition, site preparation, grading, and building construction) could potentially occur at or within 50 feet of most of these existing sensitive receptors, and as close as 250 feet from the Academy for construction of the proposed market. The employee housing development on the East Parcel would be developed in modules, in response to project demands for employees, and is expected to last 24 to 30 months within the total 25-year timeframe over which the project would be constructed. Daytime noise levels could be as high as 85 dB at the exterior of the Academy buildings for short periods during construction at the East Parcel, which could result in disruptive noise within classrooms. In addition, as the Specific Plan is developed over the years, new sensitive land uses would be constructed and potentially occupied while construction continues and; therefore, exposing these new on-site receptors to the same noise levels. Thus, anticipated daytime

construction activities could result in noise levels that exceed Placer County's daytime (i.e., 7:00 a.m. to 10:00 p.m.) exterior noise standards of 55 dBA L_{eq} / 70 dBA L_{max} and nighttime (i.e., 10:00 p.m. to 7:00 a.m.) interior standards of 45 dBA L_{eq} /65 dBA L_{max} and could result in a temporary increase in noise levels in excess of 5 dB.

Mitigation Measure 11-1a on page 11-20 of the DEIR is revised as follows:

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

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

- All construction equipment and equipment staging areas shall be located as far as possible from nearby noise-sensitive land uses.
- All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- All construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. The self-adjusting backup alarms shall automatically adjust to 5 dBA over the surrounding background levels. All non self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels. In addition to the use of backup alarms, the construction contractor shall consider other techniques such as observers and the scheduling of construction activities such that alarm noise is minimized.
- Individual operations and techniques shall be replaced with quieter procedures (e.g., using welding instead of riveting, mixing concrete off-site instead of on-site) where feasible and consistent with building codes and other applicable laws and regulations.
- When <u>existing and</u> future noise sensitive uses are within close proximity to prolonged construction noise, noise attenuating buffers such as structures, truck trailers, temporary noise curtains or sound walls, or soil piles shall be located between noise sources and the receptor to shield sensitive receptors from construction noise.
- <u>Construction on the East Parcel shall be designed to avoid intrusive noise, defined as an interior noise level of 45 dBA L_{eq} /65 dBA L_{max} or greater, during the time when classroom activities take place at the Squaw Valley Academy. The applicant shall coordinate with administrators at the academy and shall achieve these performance standards either by adjusting the timing of construction, adjusting construction methods during times of classroom instruction, temporary screening, and/or improving noise attenuation at the school by replacing windows, increasing insulation, etc., as needed. The applicant shall prepare and submit to Placer County an acoustical study that demonstrates these criteria will be met prior to approval of each Small Lot Tentative Map for all construction on the East Parcel.</u>
- The project applicant shall sponsor and create a website that includes information on construction activities and includes when, where, and for how long noise generating construction activities would occur. In addition, prior to the beginning of each construction season written notification of construction activities shall be provided to all noise-sensitive receptors located within 2,500 feet of construction activities. Additional notifications may be provided if there are substantive changes in construction operations or noise generating activities (e.g., need for nighttime construction, special notice for blasting). Notification shall include anticipated dates and hours during which construction activities are anticipated to occur and contact information, including a daytime

telephone number, for the project representative to be contacted in the event that noise levels are deemed excessive.

Also, see Mitigation Measure 11-1b on page 11-21 of the DEIR, which addresses vibration impacts. While these measures, as revised above, would not reduce construction noise to all sensitive receptors to a level that is less than significant, they would result in a less-than-significant noise impact to the Squaw Valley Academy because the revised measure would ensure that interior noise standards would not exceed Placer County noise standards, as described in Mitigation Measure 11-1a.

Comments suggest further that interior noise levels from construction should have been evaluated because people open their windows, and that single-event-levels (SEL) for noise should have been evaluated rather than averages. SELs are a descriptor not well-suited for construction activities. SELs provide a means to express the cumulative noise energy of a single noise event, such as aircraft noise that rises above ambient levels, reaches a maximum, and then quickly falls below the ambient noise level. In the case of construction noise, which has a high degree of constant and similar noise levels, the "equivalent" noise level, L_{eq} (the noise energy averaged over a specified period of time) and the maximum noise level, L_{max} more accurately reflect how sensitive receptors would experience noise from construction activities. This is why these noise metrics, and construction noise regulations, are used to consider and regulate construction noise activities. The metric of SEL is more appropriate in those instances, near airports and similar noise sources, where the noise impacts are expressed as the cumulative energy of several distinct individual noise events. The SEL, in those instances, is similar to the L_{max} used in construction analysis (maximum perceived noise exposure), and the community noise equivalency level—CNEL— used in instances with multiple discreet SELs (such as airports) is similar to the L_{eq} metric used for construction.

Lastly, several comments express the opinion that the construction noise mitigation is vague, unenforceable, and does not quantify reductions in noise. As discussed above, the analysis considered a wide range of construction activities at a programmatic level. Mitigation measures were recommended at a similar programmatic level and reductions were quantified where appropriate. It is acknowledged that the DEIR does not quantify daytime construction noise mitigation performance standards. This recognizes the difficulty of reducing construction noise, which is mobile and variable, to levels that meet performance standards. Rather, the mitigation reflects a "do everything feasible" approach to construction noise reduction, but acknowledges the impacts would be significant and unavoidable. Noise reduction performance standards were provided for nighttime noise, as practical, such as for sound curtains (Mitigation Measure 11-1b) and a performance criterion for backup warning signals (5 dBA over the surrounding background levels) was provided (Mitigation Measure 11-1a).

Regarding the vibration mitigation, the analysis identifies potential effects to existing buildings and other specific receptors to the degree possible at this programmatic level. Performance standards are included in Mitigation Measures 11-2a and 11-2b to control vibration noise and to ensure that appropriate construction techniques are used, based on more detailed engineering that would be conducted at the subdivision map stage. These measures are enforceable by Placer County as conditions of approval for any development application occurring within the VSVSP.

Construction Noise Conclusion

The DEIR analysis quantifies reasonable and foreseeable impacts associated with implementation of the project. It uses metrics appropriate to the type of noise that would be generated by construction. The analysis conducted is consistent with the level of detail required for a programmatic EIR as well as with the methods and approaches that adequately and conservatively evaluate noise impacts. Further, the construction noise analysis takes the conservative approach of identifying that although construction occurring during the Placer County allowable hours of the day is exempt from noise standards, project construction during these allowable hours is considered a potential impact due to the number of years that construction could occur. This is further described in the Master Response regarding the 25-year construction period. Mitigation has been included in the DEIR to minimize noise exposure during both the day and the nighttime (see Mitigation Measures 11-1a and 11-1b).

The DEIR identified and disclosed the worst-case, construction-related noise levels during the anticipated multiple phases of construction, including construction activities that could overlap at the same time in the same location. This was a conservative approach and resulted in the characterization of the maximum noise effects that could occur during the proposed construction period. As such, numerous mitigation measures (as described above), were included in the DEIR that would minimize impacts and inform all potentially affected people of when construction would occur. Therefore, even though overall construction activities would occur, off and on, over a 25-year timeframe, construction activity and noise would vary substantially at individual sensitive receptors during this time. Any construction activity proposed outside of the Placer County allowable timeframes would require the application and issuance of an Administrative Review Permit prior to issuance of any grading or other construction-related permits. Because the DEIR construction noise analysis was conservative, a comprehensive list of feasible mitigation measures is recommended for adoption by the County as part of the EIR. Implementation of these measures would substantially reduce construction related noise levels to the extent feasible, with current best practices and approaches.

OPERATIONAL NOISE

Comments regarding stationary noise sources suggest that proposed mitigation would not be effective in reducing noise impacts to adjacent land uses. The comments also suggest that the stationary noise analysis did not discuss noise from all potential noise sources (e.g., pool pumps, hot tubs) or from all proposed land uses, such as the MAC and the mountain maintenance area (Lot 19). With regard to the traffic noise analysis, comments stated that the DEIR underestimated traffic noise, and, therefore, impacts and proposed mitigation were also inadequate. Overall, comments expressed concern that the scope of the operational noise (stationary and traffic) analysis did not adequately address specific impacts to specific receptors.

Stationary Noise

The stationary noise analysis (Impacts 11-3 and 11-4) evaluated many potential noise sources including heating ventilation and air conditioning (HVAC) units and associated equipment (e.g., compressors, pumps, fans), emergency electrical generators, parking activities, and noise associated with outdoor activities occurring within the VSVSP, and concluded they may result in a significant impact to sensitive noise receptors. Specific locations for these noise sources as well as potential other sources such as water pumps and pool equipment (e.g., pumps and filters) are not available at this stage of planning. See response to comment 09-59 for further detail regarding the programmatic scope of the DEIR. Performance-based mitigation is included in the DEIR to address potential noise from external “mechanical equipment.” Specifically, Mitigation Measure 11-3 states on page 11-28 of the DEIR:

> External mechanical equipment, including HVAC units, associated with buildings shall incorporate features designed to reduce noise emissions below the stationary noise source criteria. These features may include, but are not limited to, locating equipment within equipment rooms or enclosures that incorporate noise reduction features, such as acoustical louvers, and exhaust and intake silencers. Equipment enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors.

Sound level limitations are provided, along with the types of features that would need to be installed to achieve these limitations at noise sensitive land uses. Further, mechanical equipment of this type would be subject to Placer County Noise Ordinance, Article 9.36.060 Sound limits for sensitive receptors, as explained in the DEIR.

In addition to comments regarding noise generated by mechanical equipment, some comments were concerned with noise associated with the MAC. The MAC would be an indoor facility that could include various entertainment venues (e.g., bowling alley, water slide, climbing wall, arcade, movie theater, etc.), as well as restaurants and potentially outdoor swimming pools. The noise sources associated with this type of land use would consist of typical mechanical equipment, as described above, and the noise associated with the particular activity taking place (e.g., people talking, laughing, etc.). These activities would take place indoors with the exception of outdoor swimming pools, which could result in people talking, playing, or

laughing. Noise associated with people using an outdoor swimming pool would be consistent with current activities at Squaw Valley and not be considered a substantial noise source. Therefore, the MAC would not be considered a noise-generating land use. The MAC would not host special sporting events or large concerts that could generate noticeable outdoor noise.

Commenters were also concerned that mitigation proposed for stationary noise sources would not be effective and that the stationary noise analysis did not identify specific impacts to specific receptors. Specific sensitive receptors were identified (see summary discussion on page 11-27 of the DEIR), but the analysis also reflects the programmatic nature of the document based on the nature of the proposed project (see response to comment 09-59). Mitigation measures require further analysis at the more specific design stage, and review by Placer County that will be conducted as individual development applications are submitted. Noise studies will be required that will influence the design and/or location of buildings such that all proposed noise sources comply with Placer County Noise Ordinance Article 9.36.060, Sound limits for sensitive receptors, as well as the limits discussed in the DEIR mitigation measures.

Commenters also stated that noise associated with the relocation of the mountain maintenance facility (Lot 19) was not adequately addressed in the DEIR. Because the DEIR is programmatic, the analysis of impacts from the facility is as specific as is reasonably foreseeable, given that design-level details have not been established. As described in Chapter 3, “Project Description,” of the DEIR, the existing mountain maintenance facility would be relocated to the Lot 19 area, as shown in Exhibit 3-5 of the DEIR. Similar activities that occur now at the existing mountain maintenance facility would continue to occur at the new location at Lot 19. Lot 19 is currently used as the carpentry shop for the resort, a parking lot, and a small apartment building for employee housing. The apartment building would be removed (see identification of removal of existing employee housing in Chapter 3 of the DEIR). The mountain maintenance facility, which would be fully enclosed with garage doors for vehicle access, would be used for propane storage (and receipt of propane deliveries) and maintenance of rubber tire vehicles. The new use would be similar in terms of noise, with vehicles entering and exiting as they do under current conditions, but with the addition of potential vehicle maintenance noise (e.g., impact wrenches, air compressors, etc.). If not properly oriented, this facility could generate intrusive noise to sensitive land uses. These types of activities could result in noise levels of approximately 82 dB L_{eq} and 86 dB L_{max} at a distance of 50 feet. Based on these reference noise levels, the County’s daytime noise standards would be exceeded within approximately 200 feet from the acoustic center of Lot 19 and the nighttime noise standards would be exceeded within approximately 300 feet from the acoustic center of Lot 19. It is anticipated that no sensitive receptors would be located within 300 feet of this facility. As the exact layout and building orientation of the new mountain maintenance facility has not been determined at this time in the planning phase, it cannot be determined with any level of certainty if the new facility would be located within the aforementioned distances or if noise levels would be as high as estimated. However, this noise is easily contained by building design and orientation. As discussed above, new stationary noise sources (e.g., a loading dock, mechanical equipment) that could potentially be proposed at this site would be subject to the same requirements as described above (e.g., Mitigation Measure 11-3 and the Placer County Noise Ordinance). Upon completion of site design, additional Placer County review would be required. At this stage, if the proposed design would not comply with Placer County noise standards, all design considerations (e.g., building location and orientation) and sound attenuating features (e.g., sound barriers) would be considered to ensure compliance with Placer County Standards.

Traffic Noise

Comments pertaining to the traffic noise analysis (Impact 11-5) state that the overall traffic noise analysis was inadequate and underestimates noise, and that not enough mitigation was provided for existing sensitive receptors along Squaw Valley Road. Comments suggested measures such as reducing speeds on Squaw Valley Road, providing sound insulation and air conditioning for residences that do not currently have dual pane windows, redesigning striping and bike lanes on Squaw Valley Road, and adding sound walls.

Commenters state that the traffic noise levels were underestimated and actual noise levels would be higher than reported in the DEIR. In fact, traffic noise was overestimated in the DEIR because it was based on

traffic associated with peak days during the summer and winter months. Traffic noise models typically use AADT to calculate noise levels. However, due to the high variability in seasonal traffic within the Tahoe Basin, annual average data would misrepresent traffic impacts during peak season months. The traffic patterns of the project area can be characterized as having relatively high peaks and then very low normal traffic volumes, particularly during the fall and spring. This is due to the large influx of people arriving to the project area during the winter for snow activities, as is explained on page 11-32 of the DEIR, and during peak summer weekends. As such, the DEIR evaluated traffic noise based on these seasonal patterns so that the maximum potential noise exposure could be quantified. Therefore, as described in Table 11-11 and the text of page 11-31 of the DEIR, the noise analysis only used traffic data from the 15 busiest days of the year… To make the analysis even more conservative, peak hour traffic was used, and applied to the entire day using an estimation factor. Thus, the significance conclusion is based on "…peak hour traffic for a peak summer Friday afternoon in August (which has been determined to be the busiest month of the summer season)." (See Table 11-11 of the DEIR.) Summer (as opposed to winter) is also the season where there would be the greatest change between pre-project and post-project traffic noise levels.

If annual traffic data were available and used as is typical and standard, the noise analysis would have incorporated traffic during the week and during non-peak periods, including the less-visited fall and spring. As such, traffic-noise levels would be lower than what was reported in the DEIR in Table 11-11. Instead, the traffic noise analysis conducted in the DEIR represents the maximum noise levels that could occur throughout the year. It is likely that traffic noise increases from annual average trips would not result in perceptible increases and impacts would be less than significant. Further, because the impact conclusion was based on peak hours in August only, the finding that traffic noise would be significant places great weight on only a few isolated hours, rather than on the great majority of the year when traffic noise would not be noticeable compared to current conditions (i.e., based on traffic modeling conducted for the DEIR, greatest increase in traffic would occur during peak seasons). No substantial evidence was provided in comments to show how the traffic noise levels were allegedly miscalculated.

Another recurring comment is that interior noise levels at existing receptors along Squaw Valley Road would be adversely affected by project-generated traffic noise. The comments suggest that additional mitigation should have been considered, and that the DEIR relies on an unsupported assumption that every residence has adequate sound insulation and dual pane windows such that interior noise levels would not be excessive. ("Further, it is likely that interior noise is within standards of 45 dBA L_{dn}, given the colder climate and likelihood that most (or all) homes have dual pane windows and insulation." DEIR page 11-33).

Based on a review of these comments, it appears that not all residents have insulation and/or dual pane windows. Further, several commenters state that they regularly keep their windows open during the summer because they do not have air conditioning. It is acknowledged that opening windows and doors that face onto Squaw Valley Road would render any sound insulation or acoustic window less effective, and opening windows and doors is not considered when evaluating compliance with indoor noise standards in the DEIR. During peak periods (primarily in the summer when it is warmest) when noise would exceed standards (traffic on Friday evenings on peak summer Fridays in August) interior noise for residences that abut Squaw Valley Road could exceed standards for short time periods (evening peak hours). Given the limited nature of this occurrence, while adverse, this is not considered a substantial occurrence (it happens infrequently and for a short time on those few days it would occur). Moreover, the noise would only be adverse if windows and doors that face Squaw Valley Road are open. Irrespective of this, mitigation has been revised and clarified within this FEIR that eliminates the project's increase in traffic noise, as explained below.

Reducing the speed on Squaw Valley Road has been suggested by many commenters as a potential mitigation measure to reduce traffic noise. This was not specifically addressed in the DEIR. The speed limit along Squaw Valley Road is currently 35 miles per hour (mph) with sections of 25 mph (primarily for turns). Based on the projected noise levels along Squaw Valley Road (using the noise analysis methodology applied in the DEIR), reducing speed limits even to 15 mph would still result in an exceedance of the 60 dBA L_{dn} threshold for exterior noise levels at up to 130 feet from the centerline of Squaw Valley Road during these peak summer days. Further, Squaw Valley Road does not meet the Placer County criteria for a speed

reduction as speed limits are set by Placer County based on the driving speed of the 85th percentile of drivers. (If speed limits are set below this level, it would cause potential safety hazards because drivers have a propensity to drive at the "safe" rather than posted speed.) As such, even if effective, the use of a speed limit reduction for the purposes of reducing a significant impact would not be reliable to ensure that people are always complying with the posted speed limits.

In addition, comments requested that speeds for construction-related "big trucks" be limited as well. Construction-related traffic would include worker commute vehicles and haul-trucks associated with the import/export of construction material and excavation/fill material. As discussed above, speed limits on Squaw Valley Road are appropriate. All construction-related vehicles would be required (as anyone else) to comply with posted speed limits. As described in Chapter 9, "Transportation and Circulation," of the DEIR, a detailed construction schedule was not available at the time of the DEIR preparation, and, therefore, a quantitative analysis of construction traffic was not conducted. However, assuming the most construction-intensive year, it was estimated that up to 136 construction workers may be required per day. Some of these workers may carpool, but conservatively assuming the addition of 136 vehicles traveling at 35 mph, associated with construction, to the existing noise levels, an increase of 0.1 dBA L_{dn} would occur, which would be imperceptible to the human ear. As such, no change in noise levels on Squaw Valley Road would occur as a result of construction-related worker commute vehicles, therefore, reducing the speed limit for construction vehicles would not be warranted. Further, as discussed in Chapter 9, "Transportation and Circulation," Mitigation Measure 9-8 would require the development of a construction traffic management plan that would apply to all construction-related traffic including worker commute vehicles and haul trucks. The plan would include provisions to limit construction related traffic during peak/holiday weekends and special events and daily traffic. The traffic management plan would ensure that traffic would be spread out as evenly as possible and to avoid the busier times of the day, thus avoiding high concentrations of traffic that could translate to increases in traffic-related noise.

As suggested by some comments, the DEIR did consider sound walls as a mitigation measure for existing receptors along Squaw Valley Road (see page 11-33 of the DEIR). Residences along Squaw Valley Road are located as close as 45 feet from the road, and in many cases a driveway leads from Squaw Valley Road to the front of the residence. A sound wall would only be effective if it would block the line-of-sight of the noise source (i.e., Squaw Valley Road) and therefore would need to be at least 8 feet tall and in many instances much taller, depending on topography of the specific area and the elevation of the home relative to the road. Further, due to the many driveways, sound walls would have many openings between the noise source and the receptor, making them ineffective in this location. In addition to the many limitations and constraints of building effective sound walls along Squaw Valley Road, they could present a safety hazard to cars exiting the homes were sound walls are present due to limited line-of-site to the road as a result of the walls. Sound walls would also block or interfere with the views of many homes along Squaw Valley Road to the meadow, and could therefore be found incompatible with the more rural nature of the area (as opposed to locating sound walls in urban areas).

Many comments stated that mitigation was not provided to reduce traffic noise impacts to existing sensitive receptors along Squaw Valley Road. As described above, traffic noise levels would be highest during the peak days of the year, which would be relatively infrequent in comparison to the rest of the year when traffic noise levels would be lower. Nonetheless, traffic noise would increase over existing conditions and would result in a perceptible increase in noise during the summer peak period. Therefore, Mitigation Measure 11-5 has been revised to include the application of rubberized asphalt on Squaw Valley Road in areas that would experience a significant noise impact (see revised Mitigation Measure 11-5, below). Incorporation of this mitigation measure would reduce noise levels on Squaw Valley Road by an average of 4-6 dBA as compared to traditional road pavement (i.e., existing conditions) (Bollard & Brennan, Inc. 1999). Installation and function of the rubberized asphalt would be similar to standard asphalt application and maintenance procedures with the added benefit of reducing traffic-related noise. This reduction in sound levels would return traffic noise levels to at or below existing conditions, eliminating project contributions to this impact. Further, noise levels would be reduced to below the exterior noise standard of 60 dBA L_{dn} along Squaw Valley Road in many areas where this standard is identified in the DEIR as being exceeded under existing

condition. Therefore, the significant and unavoidable impact that was concluded in the DEIR to many of the existing sensitive receptors along Squaw Valley Road, as described in Impact 11-5, would be reduced to a less-than-significant level.

Mitigation Measure 11-5 on page 11-33 of the DEIR is revised as follows:

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

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

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

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

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

- A RHMA overlay shall be installed on top of the existing conventional asphalt on Squaw Valley Road beginning at its' intersection with SR 89 and terminating at its intersection with Christy Lane.
- The RHMA overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4-6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to current noise levels.
- Prior to installation of any RHMA overlay, the applicant shall hire a qualified acoustical engineer to review all design parameters to ensure that the RHMA design is adequate, based on most current technology, practices, and availability of products, such that, at a minimum, 4 dB in noise reduction relative to conditions without a RHMA overlay would be achieved.

The conclusions regarding significance after mitigation on page 11-33 of the DEIR are revised as follows from significant and unavoidable to less than significant after mitigation:

Significance after Mitigation

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

~~Existing sensitive receptors are located within the 60 dBA L_{dn} noise contour of Squaw Valley Road and would continue to be exposed to noise levels that exceed Placer County noise standards (i.e., 60 dBA L_{dn}). Further, during the summer, noise along Squaw Valley Road would increase such that in some locations where modelling indicates existing conditions are in compliance with Placer County exterior noise levels, the addition of project generated transportation noise would result in exceedance of the 60 dBA L_{dn} standard for transportation noise. Exterior noise levels at existing~~

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

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

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

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

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

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

With regards to interior noise levels, typical construction of a building with a wood frame and stucco or wood sheathing would provide, at a minimum, a 25 dB exterior-to-interior noise reduction with its

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

3.1.6 Master Response: Construction Emissions

Comments were received regarding the estimation of construction-generated emissions of criteria air pollutants (CAPs), CAP precursors, and greenhouse gases (GHGs) included in Chapters 10, "Air Quality," and 16, "Greenhouse Gases and Climate Change," of the DEIR. Construction-generated emissions of CAPs and precursors are discussed under Impact 10-1 of the DEIR. Construction-generated emissions of GHGs are discussed under Impact 16-1 of the DEIR. Construction emissions include emissions generated by off-road equipment, trucks hauling materials to and from the construction site, and construction worker commute exhaust emissions, and other miscellaneous activities (e.g., building construction, asphalt paving, application of architectural coatings).

The April 2015 VSVSP shows some changes to the lot acreages since preparation of the DEIR. The April 2015 VSVSP also broke down the East Parcel into smaller lots to reflect that employee housing would be contained in multiple smaller buildings rather than one large building. There is no change, however, to the total acreage where construction would occur or to the total amount of residential space or commercial space that would be developed. Thus, the estimation of construction emissions under Impact 10-1 and Impact 16-1 in the DEIR is considered accurate for the April 2015 VSVSP.

INCLUSION OF INFRASTRUCTURE IN AIR QUALITY AND GREENHOUSE GAS MODELING

One comment asked whether the estimation of construction emissions accounted for emissions associated with water transmission lines, electrical and propane distribution infrastructure, a water storage tank, new groundwater wells, and the upgrade to the existing sewer line that connects the existing Village area and the East Parcel with the existing Tahoe-Truckee Sanitation Agency (T-TSA) line that runs along State Route (SR) 89. Emissions associated with the installation of water transmission lines, electrical and propane distribution lines, and the water storage tank in the Village area and/or at the East Parcel are accounted for in the grading phase of construction. The grading phase includes the use of multiple excavators and tractor/loader/backhoes typically used to dig trenches for these utility connections. The aforementioned equipment is in addition to the use of multiple graders and scrapers that are typically used for area grading. A detailed list of the equipment included in the grading phase of construction is available in Appendix H of the DEIR.

Emissions associated with the upgrade to the existing approximately 1.87-mile-long sewer line between the existing Village and SR 89 were not individually estimated, however. This utility connection would involve replacement of the existing sewer pipe with one of larger diameter. To estimate emissions from this activity the Roadway Construction Emissions Model (Version 7.1.5.1) was used (Sacramento Metropolitan Air Quality Management District [SMAQMD] 2015). The model, including the list of detailed modeling input parameters, is included as Appendix D to the FEIR. This model was developed by SMAQMD and is recommended by air districts throughout California for estimating emissions generated by construction activity that is linear in nature, including sewer lines, and underground fiber optic installations. Table 10-4 on page 10-14 of the DEIR is revised as follows to include emissions of CAPs and precursors associated with the upgrade to the sewer line:

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

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

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

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

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

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

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

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

The totals shown in the revised Table 10-4 assume that the sewer line upgrade would take place at the same time that facilities are constructed at the Village and East Parcel. Given that utility infrastructure is often put in place before other phases of construction begin suggests that this may be a conservative assumption. The totals are also conservatively high because it is assumed that the sewer line upgrade would occur during one of the peak seasons of construction activity at the Village and East Parcel. As shown in the revised Table 10-4, total maximum daily emissions of CAPs and precursors, including emissions associated with the upgrade to the sewer line, would not exceed applicable PCAPCD thresholds. Therefore, construction-generated emissions of CAPs and precursors would not violate or substantially contribute to a violation of the ambient air quality standards, or conflict with regional air quality planning efforts. This impact would remain less than significant, and the impact conclusion for construction-generated CAPs and precursors identified under Impact 10-1 of the DEIR is unchanged.

GHG emissions from construction activity associated with the upgrade of the sewer line were also not specifically accounted for under Impact 16-1 of the DEIR. Thus, GHG emissions associated with the upgrade to the existing approximately 1.87-mile-long sewer line between the existing Village and SR 89 were also estimated using the Roadway Construction Emissions Model (Version 7.1.5.1) and Table 16-1 on page 16-15 of the DEIR is revised as follows to include these GHG emissions.

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

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

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

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

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

As with revised Table 10-4, the totals shown in the revised Table 16-1, which reflect maximum annual GHG emissions, conservatively assume that the sewer line upgrade would take place at the same time that facilities are constructed at the Village and East Parcel. It is also conservatively assumed that the sewer line upgrade would occur during one of the peak seasons of construction activity at the Village and East Parcel. As shown in the revised Table 16-1, conservative estimates of the peak annual GHG emissions, including GHGs associated with the upgrade to the sewer line, would not exceed PCAPCD's Tier I Threshold of Significance of 1.100 MT CO_2e/year. Therefore, GHG emissions from project-related construction would not be substantial and this impact would remain less than significant. The impact conclusion for construction-generated GHGs identified under Impact 16-1 of the DEIR is unchanged.

USE OF APPROPRIATE AIR QUALITY AND GREENHOUSE GAS EMISSIONS MODEL

Other comments question the accuracy of the estimates provided in the DEIR of CAPs (and precursors) and of GHGs associated with construction of the facilities at the Village and the East Parcel. Some comments question whether CalEEMod is the appropriate model for estimating emissions. While the County and its consultants acknowledge that CalEEMod may have some limitations, CalEEMod is recommended by PCAPCD and other air districts throughout California. CalEEMod is the best available method for estimating construction-related emissions, particularly when details about the timing of various stages of construction are not known at the time of analysis.

Some comments criticize the way CalEEMod was used to estimate maximum daily emissions of CAPs (and precursors) and peak annual emissions of GHGs from construction of the proposed facilities at the Village and East Parcel. Detailed information about what facilities would be constructed and the timing of that construction are not known at this time. As explained in Chapter 3, "Project Description," of the DEIR, the timing of development over the approximate 25-year build out period will largely be market driven. The project applicant, however, is certain that no more than 20 percent of the overall project construction effort would occur during any single year. This is a very conservative assumption as 20 percent of the construction effort occurring in a single year, for a project with an estimated 25-year buildout period, would be very high for a project where development would respond to market demands (i.e., the local resort residential real estate market could absorb a significant number of new units). For the DEIR, one single CalEEMod run was performed that estimates the level of construction emissions if 100 percent of the land uses were

hypothetically constructed during a single construction season—this CalEEMod run is included in Appendix H of the DEIR—and then 20 percent of the total estimated emission levels was used to compare to PCAPCD's thresholds.

One comment suggests that the CalEEMod run underestimates the number of construction equipment because, as explained in a CalEEMod user's tips sheet published by SMAQMD, the default values CalEEMod uses for construction equipment are not valid for project sites greater than 35 acres (SMAQMD 2015:2), and the project construction disturbance area is greater than 35 acres. Therefore, the comment suggests, the CalEEMod run in DEIR Appendix H should not have used the default equipment fleets automatically input by CalEEMod. Contrary to the commenter's assertion, however, some adjustments were made to the default equipment fleet as indicated in the CalEEMod run report presented in Appendix H of the DEIR. For instance, a crane was included in the construction equipment fleet because some of the buildings are proposed to be five to seven stories tall. Additional equipment was also added to the default equipment fleet to account for demolition of the existing surface parking lot in the main Village area, removal of the existing asphalt, grinding the asphalt, and repurposing it as road base for the existing mountain maintenance road network at the ski mountain—this is noted on page 2 of the 25-page CalEEMod run file in DEIR Appendix H.

The same comment emphasizes that the total acreage subject to construction activity included in the CalEEMod run was 57.09 acres, which is substantially higher than the 35-acre limit mentioned in SMAQMD's user tips sheet. The commenter provides no information suggesting what numbers of equipment should be included in the model run or provide any other reason why the modeled equipment fleet would be insufficient. Additionally, it is important to understand how the acreage parameter functions in CalEEMod in relation to key input parameters for residential and commercial land use types, namely the number of dwelling units and floor area. When entering a residential land use in CalEEMod, the first parameter to be entered is the number of dwelling units. CalEEMod then estimates the associated acreage, but this value can be overridden by the user. Similarly, when entering a commercial land use in the model, the first parameter to be entered is the size of the floor area and CalEEMod then estimates the associated acreage, a value that can be overridden by the user.

After all the land uses proposed in the VSVSP are entered into CalEEMod with their respective number of dwelling units and floor area, the total default acreage estimated by CalEEMod is 35.62 acres, which is not substantially greater than the 35-acre limit suggested by SMAQMD. After the user overrides CalEEMod's default acreage values with actual estimates from the project description, which are included in Table 3-1 of the DEIR, the total area of the effected lots amounts to 57.09 acres. While 57.09 acres is substantially greater than the 35-acre level stated by SMAQMD, the County and its consultants did not make substantial changes to the default equipment fleet, other than the additions mentioned above, for several reasons. One reason is that much of the area where new construction would occur is previously disturbed and, therefore, would likely require less grading and earth movement than is typically needed for greenfield (undeveloped) sites. The County and its consultants also reviewed the equipment fleet used for the DEIR modelling and did not identify any other specific reasons why it would be insufficient or reasons why greater numbers of equipment would likely be used. This review, also informed the additions of equipment to the default fleet described above.

Furthermore, it is important to understand that when CalEEMod estimates the types and numbers of equipment needed for a particular construction project, its estimates are not as sensitive to the acreage of the construction site as both the commenter and SMAQMD's user tips sheet suggests. For example, if a user enters into CalEEMod a development consisting of a 560-unit low-rise apartment complex on a 35-acre site—or on a 17.5-acre site—CalEEMod estimates that the grading phase of construction will necessitate the same fleet of equipment (i.e., two excavators, one grader, one rubber-tired dozer, two scrapers, and two tractor/loader/backhoes). In other words, CalEEMod assumes the exact same equipment fleet for a project of two different sizes.

Another comment suggests that the number of equipment should be increased in the CalEEMod run to compensate for the shortening of some construction phases in the schedule, which was done to acknowledge that outdoor construction activity cannot take place year round in the Sierra due to inclement

weather. This comment refers to "a general rule of thumb" listed on SMAQMD's user tips sheet that suggests if the schedule is shortened by ½ then the number of equipment needs to be doubled (SMAQMD 2015:2). However, the durations of all the construction phases in the schedule were not decreased as the commenter intimates. As shown by the table titled "Construction Phasing" on page 2 of the 25-page CalEEMod run file in DEIR Appendix H, the duration for all but one of the construction phases was actually *increased*. The demolition phase was increased from the default value of 70 days to 144 days; the site preparation phase was increased from 40 days to 144 days; the grading phase, which is the phase of construction that is typically most emissions-intensive, was increased from 100 days to 144 days; the paving phase was increased from 75 days to 144 days; and the architectural coating phase was increased from 75 days to 144 days. Only the building construction phase was decreased—from the default value of 1,110 days to 314 days—to fit into one year of 6-day work weeks. The number of off-road heavy-duty construction equipment used during this phase has not increased to offset the shortened duration of the phase given the density of the buildings that would be constructed. This is because less equipment is needed on the ground when a development consists of multiple-story buildings compared to a development that consists of buildings of fewer stories spread out over more space. Construction of higher-density development typically involves less construction equipment on the ground. Also, while no increases were made to the number of equipment needed during the condensed building construction phase, no decreases were made to the number of equipment used during the five other construction phases. Moreover, the commenter did not provide any substantiated suggestions about what types and numbers of equipment should be included for any of the construction phases.

There are additional reasons the County regards the construction emissions estimate in the DEIR to be conservative. First, the CalEEMod run assumes that demolition of the existing parking lot could take place at the same time new facilities are constructed in its place even though it is physically impossible for demolition and new construction to take place at the same location at the same time. Second, while the default value for the number of work days per week that construction would occur was changed from 5 work days per week to 6 work days per week, no reductions were made to the amount of equipment that would be needed or the number of hours per day construction equipment would be used. Third, the applicant and County expressed doubts about whether as much as 20 percent of the total construction effort would ever occur during a single year of the 25-year buildout period and, given the size of the project. The 20 percent assumption appears to be a very conservative parameter that assumes far more construction would ever occur at one time than realistically expected.

OVER-ESTIMATION OF MAXIMUM ANNUAL DEVELOPMENT IN COMMENTER'S MODEL RUN

One commenter prepared an alternative CalEEMod run as part of a comment on the DEIR (see comment 012a-14). However, this alternative model run severely overestimates the magnitude of construction that would occur in one year. Instead of modeling the construction of 20 percent of the total specific plan (the DEIR calculated emissions from construction of the entire project and calculated 20 percent of the total to represent the maximum possible single year), the commenter selectively inputted development on three lots that, while roughly 20 percent of the construction acreage, represent nearly half of the total square footage of the project. Specifically, the commenter's CalEEMod run included the condo/townhouse high-rise residential units proposed on lots 1, 4, and 13 in the Village and states these three facilities represent 20 percent of construction activity because their combined acreage amounts to 11.51 acres, 20 percent of the total 57 acres on which total construction would occur. However, while these three lots comprise 20 percent of the project by acreage, they consist of 48 percent of the total project square footage and 54.7 percent of the total number of units. If the portion of the project included in the model could be constructed in a single year, then the entirety of the project could be completed in two or three years, which is not realistic for a project of this size. The DEIR project description also explains that the pace for constructing various land uses and facilities would be market driven. Constructing all the condo/townhouse high-rise units on Lots 1, 4, and 13 at one time would likely oversaturate the local market for this land use type. The building construction phase is the most air emission/GHG-intensive relative to other phases (e.g., grading, paving). Therefore, the commenter's substantial overestimate of the amount of project buildings that would be

constructed during a single construction season (more than double) leads to a significant overestimate of the project-generated construction emissions.

The commenter selected development on these three lots (1, 4, and 13) because they represent approximately 20 percent of the total acreage of the VSVSP, but the analysis does not fit the assumption that 20 percent of the total construction effort could occur in one year, as stated in the DEIR. This analysis therefore dramatically overstates the potential construction emissions of the project. As discussed in the Master Response regarding occupancy assumptions, CEQA is intended to address reasonably foreseeable impacts and to provide mitigation for significant adverse impacts. The CEQA process and informed decision making is ill served by grossly overstating the environmental impacts of a project.

3.1.7 Master Response: 25-Year Construction Period

Several comments were raised regarding the project's anticipated 25-year construction period. The comments ranged from general concern that noise, traffic, and dust generation would occur over this long a time frame, that it would disrupt the peaceful nature of Squaw Valley, that it would negatively affect property values, and that it should be labeled as permanent (rather than temporary given 25 years exceeds the amount of time that most people live in their homes). These issues are discussed below, with a focus on the most predominant issue raised, noise.

PROJECT PHASING AND BUILDOUT PROJECTIONS

As discussed in various parts of the DEIR, including the noise analysis (Chapter 11, "Noise," of the DEIR), the actual amount of time it takes to construct the project will be market-driven. The project applicant estimates that the largest phase could result in construction of up to 20 percent of the project in one year, although it may not be that intensive. During some years, construction would be extensive and in others, little or no construction may occur, depending on demand and other factors. Most construction would occur during daytime hours, with limited construction at night, such as concrete pours that occur in the summer when cooler temperatures are important. Construction is therefore anticipated to occur off and on over the expected 25-year time between when construction activities begin, and the last phase of construction. Depending on the market, there may be some years when no additional construction occurs. Consequently, construction noise and other construction related impacts will occur off and on over a 25-year period. See page 11-18 of the DEIR. The type of construction activities will also vary. At times, the majority of construction work may be interior, and the building facades would shield residents and visitors from view of construction work and noise.

DEIR CONCLUSIONS REGARDING CONSTRUCTION NOISE

Typically, construction noise is considered temporary. In most jurisdictions, it is regulated by noise ordinances. Daytime construction is typically exempted from regulation in noise ordinances, and this is the case in Placer County. Most CEQA analyses conclude that, because daytime construction noise is exempted by local noise ordinances and/or would be temporary, daytime construction noise is not a significant environmental impact.

The DEIR did not follow this course in arriving at its significance conclusions. The DEIR acknowledges the County's ordinance and its exemption provisions, but then concludes (on page 11-20):

> Although daytime construction noise is exempt by the Placer County municipal code and a majority of the construction would take place during the exempt hours, construction activities would occur for an extended period of time, would be located in close proximity to existing and future planned sensitive receptors, and would result in relatively high noise levels, with temporary increases over ambient noise levels in excess of 5 db. For these reasons, construction-related noise during the daytime

> (Placer County exempted hours) may result in excessive noise levels that disturb nearby sensitive receptors.

The DEIR then concludes the impact is significant. A number of mitigation measures are proposed in the DEIR to substantially reduce noise. Despite the mitigation, the DEIR concludes that while noise levels will be reduced, "… construction activities would continue to produce disruptive daytime noise over an extended period. Thus, this impact would remain **significant and unavoidable**."

Thus, the DEIR and the comments are in basic agreement with respect to construction noise. The length of the construction period, with development occurring off and on for 25 years, is the primary reason that the DEIR concludes the impact will be significant.

The critique that the DEIR should not have labeled the impact as "temporary" is noted. The impact will occur, off and on, for 25 years. It will be more or less noticeable, depending on the construction activities at the time, and whether those activities occur within the interior of buildings or outside. There would be some periods where there is no construction activity and no construction noise. At other times, construction activities may be confined to the building interior, and the buildings would shield residents and visitors from construction noise. Whether some consider this temporary or permanent does not alter the conclusions of the EIR or that the EIR fully discloses the extent and length of time this impact would occur.

DEIR CONCLUSIONS REGARDING CONSTRUCTION TRAFFIC AND AIR QUALITY

The DEIR addresses construction impacts associated with traffic and air quality. Regarding traffic, outside of the noise issue (addressed above), impacts would be significant when construction occurs, but can be mitigated through implementation of a comprehensive construction traffic management plan, which would address the number and size of permissible trucks, staging, monitoring and repair of roads, etc. This is addressed under Impact 9-8 on pages 9-66 and 9-67 of the DEIR. Implementation of Mitigation Measure 9-8 (Develop a Construction Traffic Management Plan) would reduce this impact to a less-than-significant level.

Regarding air quality, construction impacts are addressed under Impact 10-1 and Impact 10-2 (short- and long-term emissions of criteria pollutants) and Impact 10-4 (exposure to toxic air contaminants). Air quality impacts from construction are either less than significant, or can be reduced to a less-than-significant level through mitigation. The issue of silica dust is addressed in response to comment I282-4.

PROPERTY VALUE IMPACTS

Several comments were raised regarding the effects of 25 years of construction on property values, with most comments indicating that noise from construction could lower property values. This concern is noted and will be considered by the Placer County Planning Commission and Board of Supervisors when they consider project approval, although it is not an environmental issue.

CEQA specifically addresses social and economic issues in Section 15131 of the CEQA Guidelines:

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

Property values are an economic/social issue. It is not known if project construction activities would negatively affect property values. Furthermore, no evidence has been provided to suggest that a reduction in property values would result in physical effects to the environment in this case. If it could be shown, for instance, that a property was reduced in value such that an owner abandoned the structure and let it fall

into disrepair so that it became a source of blight, there would be the potential for a significant environmental change and impact. No such evidence has been presented, and a dramatic change in property values that would result in property abandonment is not expected. Therefore, this issue is not addressed further.

3.1.8 Master Response: Significant and Unavoidable Impacts

Numerous comments state that the proposed project would result in 23 significant and unavoidable impacts, which is expressed as too great a number for the project to be approved. Further, many of the comments state that the County's own policy (General Plan Policy 1.G.1), addressed below, prevents the County from approving projects that would result in any impacts that cannot be mitigated to a less-than-significant level. This Master Response addresses the recurring comment that the project would result in too many significant and unavoidable impacts (regardless of the actual number of impacts).

Note: As described in Section 2.3, "Revisions to the DEIR," of this FEIR, three of the 23 significant and unavoidable impacts identified in the DEIR have been reduced to a less-than-significant level due to changed conditions since publication of the DEIR as well as the addition of a new mitigation measure. These impacts include one traffic impact (Impact 9-3: Impacts to Caltrans intersections; signalization of the intersection of Alpine Meadows Road/SR89 has been completed, eliminating the impact at that intersection) and two noise impacts (Impact 11-5: Exposure of new and existing sensitive receptors to operational project-generated transportation noise sources [potentially significant for existing sensitive receptors] and Impact 18-32: Cumulative long-term ambient noise levels)(both mitigated by the addition of rubberized asphalt paving to Squaw Valley Road).

CEQA CONTEXT

The project's significant and unavoidable impacts are summarized in Section 18.2, "Significant Environmental Effects Which Cannot Be Avoided," of the DEIR. In total, 23 impacts, including individual project impacts and cumulative impacts, were identified as significant and unavoidable in the DEIR, either because recommended mitigation measures would not fully reduce the impact to a less-than-significant level, or because no feasible mitigation is available (see note above regarding a reduction in the number of significant and unavoidable impacts to 20).

CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the Placer County Board of Supervisors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; California Code of Regulations [CCR] Section 15093).

TEMPORARY, PERIODIC, AND ONGOING SIGNIFICANT AND UNAVOIDABLE IMPACTS

As decision makers and the public consider the impacts of the project, some additional context surrounding the significant and unavoidable impacts may be helpful. All of the following information is included in the DEIR, but is consolidated and organized here to further understanding of the significant and unavoidable impacts.

While 20 significant unavoidable impacts would result, some would be permanent whereas others would only occur occasionally. Furthermore, of these 20 impacts, 10 are project-specific impacts and 10 are

cumulative impacts. In most of these cases, the effect is the same, but it is considered first against existing conditions, and then as a contribution to cumulative conditions. For example, removal of the Olympic Valley Lodge and Far East Center would occur only once, but it is identified in two impacts: 7-1 (project-specific) and 18-12 (cumulative).

The list below addresses the types of significant and unavoidable impacts associated with the project, grouping similar impacts (such as traffic congestion) together, with context that may aid in the overall understanding of the project and its effects:

- Cultural Resources: Two buildings from the 1960 Winter Olympics that are considered historically significant would be demolished: the Olympic Valley Lodge (the Athlete's Center) and the Far East Center (Nevada Spectator's Center). The DEIR identifies this as both a project-specific significant and unavoidable impact (Impact 7-1) and a separate significant and unavoidable contribution to a cumulative impact (Impact 18-12).

- Visual Resources: Scenic vistas of the lower slopes of mountains on the west end of the Valley would be obstructed by project and cumulative development. Also, scenic vistas would be obstructed by construction equipment during the 25-year (off and on) construction period. The DEIR identifies this as both a project-specific significant and unavoidable impact (Impact 8-1) and a separate significant and unavoidable contribution to a cumulative impact (Impact 18-14). These impacts would be reduced in magnitude by project changes described in Section 2.1, but the impacts would remain significant and unavoidable.

  The overall visual character of the project site and surrounding area, including from Squaw Valley Road (County-designated scenic route) would be adversely affected by construction equipment during the 25-year (off and on) construction period. The DEIR identifies these impacts as both project-specific significant and unavoidable impacts (Impacts 8-2 and 8-3) and as separate significant and unavoidable contributions to cumulative impacts (Impacts 18-15 and 18-16). Once construction is complete, these impacts would no longer occur.

  Nighttime lighting (in addition to existing lighting) in the Village area and East Parcel would create a new source of light and glare in the Valley. The DEIR identifies this as both a project-specific significant and unavoidable impact (Impact 8-5) and a separate significant and unavoidable contribution to a cumulative impact (Impact 18-18).

- Transportation and Circulation: During peak hours on highest use winter days under project and cumulative conditions, the intersections of Squaw Valley Road with Village East Road and State Route (SR) 89 would operate unacceptably. On non-peak days, traffic is not expected to exceed the standards. As stated above, the DEIR concluded that the intersection of Alpine Meadows Road/SR 89 would operate unacceptably until a planned signal is installed; subsequent to release of the DEIR, the signal was placed into operation and this significant and unavoidable impact is now less than significant. The project would also add to cumulatively significant impacts to SR 89/I-80 Westbound and Eastbound ramps and the SR 89/Donner Pass Road intersection. Project-specific significant and unavoidable transportation and circulation impacts are identified in Chapter 9 of the DEIR (Impacts 9-2, 9-3, and 9-4) and where the significant and unavoidable impacts occur under the cumulative condition, they are identified separately in Chapter 18 (Impacts 18-21 and 18-22). Note that Impact 9-3 is no longer considered significant and unavoidable, as discussed above.

  During peak summer periods (generally Friday evening), the project would exacerbate unacceptable traffic operations on segments of SR 89 between Deerfield Drive and West River Street, and SR 28 east of SR 89 in Tahoe City. The project would also add to cumulatively significant impacts to SR 89 between Deerfield Drive and West River Street, SR 89 between West River Street and Squaw Valley Road, and SR 28 east of SR 89. Project-specific significant and unavoidable transportation and circulation impacts are identified in Chapter 9 of the DEIR (Impact 9-5) and where the significant and unavoidable impacts occur under the cumulative condition, they are identified separately in Chapter 18 (Impact 18-23).

- Noise: Project construction would generate daytime (primarily) construction noise to residences in Squaw Valley, particularly those close to the project site. Although construction noise would comply with County noise ordinances, this impact is considered significant and unavoidable due to its disruptive and long-term (off and on for 25 years) nature. The DEIR identifies this as both a project-specific significant and unavoidable impact (Impact 11-1) and a separate significant and unavoidable contribution to a cumulative impact (Impact 18-31).

  Project and cumulative traffic noise will exceed the outdoor County noise standard during summer peak traffic conditions (expected for a limited number of days each summer season). The DEIR identifies this as both a project-specific significant and unavoidable impact (Impact 11-5) and a separate significant and unavoidable contribution to a cumulative impact (Impact 18-32). As previously described, new mitigation has been added to this FEIR to reduce these two impacts to a less-than-significant level.

- Greenhouse Gases and Climate Change: The analysis in the DEIR showed that the VSVSP would be consistent with 2020 GHG targets, but that more stringent emissions goals for years after 2020 are expected to be adopted by the state prior to full buildout of the VSVSP. Because very little of the project is expected to be completed prior to 2020, and based on a Supreme Court decision pertaining to use of a threshold similar to what was used as part of the GHG analysis in the DEIR (see the Master Response regarding the GHG analysis), the EIR no longer makes a distinction between pre- and post-2020 GHG impacts. The project and cumulative GHG emissions are identified as a potentially significant and unavoidable impact, because it cannot be fully assured at this time that all future elements of Plan development will be able to attain the future, currently unspecified emissions goals and/or be able to mitigate sufficiently for GHG emissions either through design changes, other mitigation, or purchase of emission offsets. The EIR identifies this as both a project-specific significant and unavoidable impact (Impact 16-2) and a separate significant and unavoidable contribution to a cumulative impact (Impact 18-43).

PLACER COUNTY GENERAL PLAN POLICY 1.G.1

The *Placer County General Plan* (2013) provides an overall framework for the development of the County and protection of its natural and cultural resources. The Land Use Element contains the following policy that is applicable to the proposed project (see also page 4-16 of the DEIR):

- **Policy 1.G.1.** The County will support the expansion of existing winter ski and snow play areas and development of new areas where circulation and transportation system capacity can accommodate such expansions or new uses and where environmental impacts can be adequately mitigated.

Commenters state that Policy 1.G.1 should establish a level of significance for impact evaluation; that the project is inconsistent with this policy because some impacts to transportation and circulation would remain significant and unavoidable even with implementation of feasible mitigation; that the policy applies broadly not only to transportation system impacts but also to all other resource area impacts; and that the policy prevents approval of the project.

Policies of the *Countywide General Plan* and implementing community plans provide direction and guidance on issues such as the County's plans for growth and development, delivery of public services, and protection of resources. Policies that include specific quantitative standards may be utilized to establish significance criteria for evaluation of an environmental impact (e.g., Level of Service standards for County roadways). However, policies more often do not include quantitative standards or mandatory and specific language, and therefore do not establish required level of significance criteria for evaluation of an environmental impact. Policy 1.G.1 does not include specific quantitative standards that form the basis for evaluation of an environmental impact. Moreover, the qualitative nature of the policy to, "support the expansion of existing winter ski and snow play areas and development of new areas where circulation transportation system capacity can accommodate such expansions or new uses and where environmental impacts *can be adequately mitigated*," (emphasis added) implies discretion on the part of policy makers. Accordingly,

policies that do not include specific quantifiable standards related to a specific environmental effect do not establish level of significance criteria for an environmental analysis.

While the project would result in discrete peak period traffic impacts at a limited number of roadway segments and intersections on a limited number of days throughout the year, the project would not result in exceedance of transportation system capacity; rather, the Level of Service (LOS) at specific transportation network locations would operate at a substandard level for a limited period of time, as it does periodically under existing baseline conditions, after which typical traffic operations would resume. Although these impacts would occur, all feasible traffic mitigation measures have been incorporated into the project, which complies with the requirements of CEQA and is consistent with Policy 1.G.1 to adequately mitigate impacts to the transportation system.

It should also be noted that the proposed project would not expand existing winter ski and snow play areas or develop new ski or snow play areas. Rather, the proposed project would increase lodging, commercial, and recreational opportunities for skiers and riders who visit the Squaw Valley Resort.

3.1.9 Master Response: Reduced Density Alternative

Numerous comments addressed the DEIR alternatives analysis and particularly focused on the Reduced Density Alternative, specifying it should be studied further and/or selected in place of the proposed project.

When the Placer County Board of Supervisors considers whether to certify the EIR, the Board will also determine whether to approve the proposed project or an alternative that is found to be feasible and either avoids or substantially lessens any of the significant adverse effects of the project. As described in Chapter 17, "Alternatives," of the DEIR, CEQA requires that EIRs include a range of reasonable alternatives to the project. Further, CEQA provides that significant effects of alternatives be discussed, but in less detail than the significant effects of the project. As such, the DEIR includes a detailed analysis of the potential effects of the proposed project (see Chapters 4 through 16) and a less detailed, but nonetheless comparative analysis of the Reduced Density Alternative (see Section 17.3.4).

As described on pages 17-24 and 17-25 of the DEIR, the Reduced Density Alternative was developed to avoid or substantially reduce the project's significant and unavoidable impacts related to cultural resources, visual resources, transportation and circulation, noise, and greenhouse gas emissions. This alternative would reduce the overall project size (e.g., unit count, square footage, employee housing, and parking) by approximately 50 percent.

ADEQUACY OF CEQA ANALYSIS

Before addressing the Reduced Density Alternative, an overview of the analysis of alternatives addressed in the EIR is provided. As background, the CEQA Guidelines include extensive discussions on the requirements for the consideration of potentially feasible alternatives to a proposed project. In particular, Guidelines Section 15126.6 specifies, in part, the following:

> "An EIR shall include a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives…" (Guidelines Section 15126.6(a))
>
> "…The EIR should…identify any alternatives that were considered by the lead agency but were rejected as infeasible…and briefly explain the reasons underlying the lead agency's determination… Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." (Guidelines Section 15126(c))

> "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison to the proposed project." (Guidelines Section 15126(d))

The DEIR evaluated, in detail, a number of potentially feasible alternatives to the project. First, and as a preliminary matter, the DEIR explained the alternatives that had preliminarily been considered, but were determined not to be included for detailed evaluation. Those reasons are specified below and explained more fully on pages 17-7 through 17-14 of the DEIR, including: (1) a project originally proposed in 2012 (substantially larger project; not evaluated because it would not reduce any significant effects); (2) maximum development allowable per the SVGPLUO (substantially larger project; not evaluated because it would not reduce significant effects); (3) off-site alternatives (not evaluated because no other sites of sufficient size were identified that could support the project); (4) residential (no resort) development (not evaluated because impacts would likely be similar and the key project objectives would not be attained); (5) on-mountain development (placing project on the mountain slopes which would increase impacts and not attain key project objectives); and (6) project adjustments from NOP comments (not evaluated because it would not reduce any significant impacts).

Several other alternatives were considered but not evaluated in detail because they would not feasibly attain most of the basic objectives of the project, including key project objectives, as explained in the DEIR: (7) elimination of the Mountain Adventure Camp (elimination of this feature would not meet most of the basic objectives of the Project, including the fundamental key objectives related to providing a year-round destination resort with sufficient size and services to be on par with peer world class North American ski destinations. Elimination of the Mountain Adventure Camp also would not substantially reduce impacts as explained in the DEIR); (8) reduced building heights (would spread the footprint of the project resulting in more impacts, insufficient parking, etc.); (9) off-site parking facilities (economic infeasibility and spreading impacts to other areas); and (10) redevelopment of existing Squaw Valley prime real estate (demolition and rebuilding would increase some impacts and would not attain key project objectives).

The DEIR also evaluated in detail several potentially feasible alternatives to the project on pages 17-15 through 17-47, and compared the impact of each of these alternatives to the impacts of the project, topic-by-topic: (1) no project/no development alternative; (2) no project/SVGPLUO development alternative (with multiple [unplanned] projects, similar to current Squaw Valley development patterns); (3) the reduced density alternative; (4) a widened Squaw Valley Road alternative; (5) preservation of historical and wetlands resources alternative; and (6) an alternative water tank location. Thus, in addition to the no project/no development alternative, the DEIR evaluated three different land use configuration alternatives to the project, as well as a road widening and tank location alternative.

CEQA does not specify how many alternatives constitute a "range of reasonable alternatives," but provides the following guidance:

> "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." (Guidelines Section 15126.6(f))

The discussion of alternatives is subject to a "rule of reason" (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* [1988] 47 Cal.3d 376, 406-407; *Citizens of Goleta Valley v. Board of Supervisors* [1990] 52 Cal.3d 553, 565-566). "'There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.' (Guidelines, § 15126.6(a)). 'The agency's discretion to choose alternatives for study will be upheld as long as there is a reasonable basis for the choices it has made.'" (1 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act [Cont.Ed.Bar 2d ed. 2012] Project Alternatives Section 15:11, p. 743 (rev. 3/12)) (*City of Maywood v. Los Angeles Unified School Dist.* [2012] 208 Cal.App.4th 362, 420-421). "The rule of reason 'requires the EIR to set forth only those alternatives necessary to permit a reasoned choice' and to 'examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.' (CEQA Guidelines Section

15126.6(f)) An EIR does not have to consider alternatives 'whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.' (CEQA Guidelines Section 15126.6(f)(3))" (*In re Bay-Delta Programmatic Environmental Impact Report* (2008) 43 Cal.4th 1143, 1163-1164).

The DEIR "permits a reasoned choice" by evaluating a range of alternatives that includes alternatives that range from no development to maximum development allowed under the SVGPLUO; alternatives to reduce impacts on key resources; alternatives that reduce all impacts, and alternative land use types and alternative locations.

With this in mind, the remainder of this master response is focused on the alternative that generated the most comments: the Reduced Density Alternative.

ANALYSIS OF THE REDUCED DENSITY ALTERNATIVE

The analysis of the Reduced Density Alternative considered a project approximately half the size of the proposed project, including reducing the employee housing component by half. Because the financial return for the project would be less (discussed more below), some amenities or benefits, like restoration of Squaw Creek, would also be more modest due to financial feasibility.

In the topic-by-topic analysis of this alternative, found on pages 17-27 through 17-31 of the DEIR, the County concluded that some impacts would be similar: land use, soils and geology, and hazards. Several impacts would be reduced: population and housing (less of an impact but not substantially so), biological resources (potentially less as some resources may be avoided, but there would be less of a benefit associated with creek restoration), cultural resources (demolition of one of the two historic structures, Olympic Valley Lodge, would be avoided), visual resources (reduction of impact to scenic vistas), transportation and circulation (substantial reduction in trips and impacts, but significant impacts would remain), air quality (may avoid a significant impact), noise (shorter construction period, so lesser impact but still significant), hydrology (may avoid potential impacts to water quality but reduction may be offset by reduced creek restoration benefits), public services and utilities (less demand, but project impacts already less-than-significant or mitigated, including water supply), and greenhouse gases (less impact, may or may not avoid post 2020 potentially significant impact).

Contrary to some comments and as noted above, impacts to cultural resources would be lessened under this alternative because one of two existing historically significant structures would remain (Olympic Valley Lodge). A separate alternative—Preservation of Historical and Wetlands Resources—was designed to avoid both buildings by altering the project footprint (see pages 17-35 through 17-41).

Comments also state that this alternative should be designed to avoid wetlands resources. It is likely that this alternative could avoid some wetlands impacts, but it is also worth noting that the majority of wetlands impacts are associated with restoration of Squaw Creek, which would result in an overall wetlands benefit, and the residual wetlands impacts are mitigated with the proposed project. A separate alternative—Preservation of Historical and Wetlands Resources—was designed to reduce impacts to wetlands by altering the project footprint (see pages 17-35 through 17-41).

FEASIBILITY OF THE REDUCED DENSITY ALTERNATIVE

A large volume of comments expressed a desire and support for the Reduced Density Alternative because it would reduce the number and extent of significant environmental impacts, compared with the project. Because this alternative would reduce project impacts, including some significant impacts, the County would need to either adopt the alternative, or reject it because it would not meet most of the project objectives, including the fundamental objectives, and/or would be infeasible. The determination of feasibility can include site suitability, economic viability, and availability of infrastructure among other factors (Guidelines Section 15126.6(a)). Moreover, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and

technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001-1002.)

The Reduced Density Alternative would, based on the DEIR analysis, reduce significant environmental impacts and was deemed to be potentially feasible. Therefore, it met key criteria for consideration as an alternative in the DEIR. The alternative would also meet many of the project objectives, although not as fully as the proposed project. As stated on pages 17-25 and 17-26 of the DEIR, the Reduced Density Alternative may not meet project objectives for Squaw Valley to be on par with peer world class North American ski destinations while remaining economically sustainable and/or able to sufficiently fund infrastructure improvements. These objectives speak to the economic viability of the proposed project, and alternatives. For a project of the size and complexity of the VSVSP, economic viability could take into consideration a range of factors, including the various costs associated with construction and infrastructure. The project or alternative that is approved would need to be able to generate enough income to offset the costs of infrastructure and development, and provide enough return on investment to secure financing for those improvements, since many would need to be constructed prior to or concurrent with construction of units (infrastructure must be paid for before units can be completed and sold, so some sort of financing would be required). In some cases, those costs might be relatively fixed regardless of project size. For example, both the proposed project and the Reduced Density Alternative would require a new well field, water tanks, upsizing of a sewer main, and structured parking to replace parking lost by developing the project on current parking lots, and creek restoration. The total cost of such improvements might be lessened with a smaller alternative, but the per-unit costs would likely be higher.

An alternative to a private development project may be deemed economically infeasible if "the marginal costs of the alternative as compared to the cost of the proposed project are so great that a reasonably prudent [person] would not proceed with the [altered project]." (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 600; *Flanders Foundation v. City-of-Carmel-by-the-Sea* (2012) 202 Cal.App.4th 603, 622.)

The project applicant has provided the County with information regarding the financial feasibility (or infeasibility) of this alternative. Ultimately, the level of profit/loss or fiscal feasibility of an alternative to the project is up to the County decision makers (i.e., the Board of Supervisors) to determine based on their independent review and discretion, and based on substantial evidence in the record. County staff and the preparers of this EIR will not determine the feasibility of this alternative; rather, that decision will be made by the Board.

The EIR identifies this alternative as "potentially feasible," and therefore worthy of detailed analysis. (CEQA Guidelines Section 15126.6, subd. (a).) The determination in the EIR that this alternative is potentially feasible is not the same as the Board's ultimate finding of feasibility. The Board's finding of feasibility will be based on the entire record, including (but not limited to) the information in the EIR. Whether the alternative is feasible is a determination made by the lead agency after the environmental review process has been completed; this determination is based on the entire record before the lead agency, including (but not limited to) the information in the EIR (*Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1499-1508). If supported by substantial evidence, the Board's finding will be upheld. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 984-985).

If the Board were to adopt the Reduced Density Alternative rather than the proposed project, it is reasonable to expect that the project applicant would also seek to proportionally reduce or eliminate other discretionary costs for public amenities that would otherwise be incurred under the proposed project, such as reducing the scope for the planned Squaw Creek restoration, onsite trailhead public improvements (flush restrooms, public parking, signage, etc.) and off-site trail network enhancements particularly if those costs are no longer required as mitigation for impacts of the alternative or are no longer required by a regulatory agency. Although Squaw Creek restoration is a general plan policy, the degree to which the creek would be restored is not specified. Thus, a more modest restoration proposal would be foreseeable under a Reduced Density Alternative scenario, should the alternative be found to be feasible. Similarly, the scope and scale of proposed onsite and offsite recreation improvements could be reduced commensurate to reductions in

project size. These issues will be considered by the Planning Commission and the Board of Supervisors when rendering a decision on this project. The financial feasibility of this alternative (and the other alternatives selected for detailed analysis) was analyzed by a financial consultant separately from this FEIR. That report will be available at least 10 days prior to commencement of entitlement hearings before the Planning Commission or Board of Supervisors.

3.1.10 Master Response: Cumulative Analysis

Numerous comments state that the DEIR's cumulative analysis should have considered projects in the Alpine Meadows area, such as the proposed Base-to-Base Gondola project, Alpine Sierra Development, and White Wolf. These projects are discussed below following a discussion of the CEQA context for cumulative impact analyses.

CEQA CONTEXT

CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects that would cause related impacts, or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. The cumulative analysis included in the DEIR uses a combination of the "list" approach and the "projections" approach to identify the cumulative setting and impacts.

The list of probable future projects is provided in Table 18-2 of the DEIR. As stated on page 18-1 of the DEIR:

> Probable future projects are those in the project vicinity that have the possibility of interacting with the proposed project to generate a cumulative impact and either:
>
> 1. Are partially occupied or under construction;
> 2. Have received final discretionary approvals;
> 3. Have applications accepted as complete by local agencies and are currently undergoing environmental review; or
> 4. Are otherwise considered likely to be developed, based on historic development patterns, including the rate of development, in the Olympic Valley and surrounding project vicinity.

In considering cumulative projects, it is important to recognize that the economy is dynamic and does not "freeze" when an EIR begins. New projects may be proposed after initiation of an EIR, others approved, and still other projects that were previously proposed may be dropped from further consideration. This raises the question of how an EIR addresses this constantly changing canvas of related projects. One CEQA case, *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1st Dist. 1984) 151 Cal. App, 3d 61, provided guidance:

> Projects are constantly being fed into the environmental review process. The problem of where to draw the line on "projects under review" that must be included in the cumulative impact analysis of a particular project could be solved by the use of a reasonable cut-off date which could be set for every project according to a standard procedure.

The common "cut-off" date used to consider cumulative projects in an EIR is those projects under review at the time the NOP is released for a project. This is a reasonable approach when considered in the context of CEQA Guidelines Section 15125(a):

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

The specific projects mentioned by the commenters were either already included as a probable future project or were not included because they do not meet one or more of the above criteria, as described below. However, even if included, they would not result in new significant cumulative impacts in addition to those addressed in the DEIR for the reasons explained further below.

CEQA also provides guidance on what is considered a cumulative impact, as stated on page 18-1 of the DEIR:

> Section 15130(a) of the State CEQA Guidelines requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The State CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

This guidance has typically been considered in terms of evaluating the impacts of a project collectively with other related projects. Some comments have, however, suggested that all of the impacts of the proposed project should be considered collectively as a cumulative impact of the project alone. It is not required by CEQA to collectively evaluate impacts of, for instance, traffic, biology, and cultural resources as a "cumulative impact" that differs from the individual impacts of each of these resource issues. In other words, the traffic, biology, and cultural resource impacts do not, when considered collectively, suggest that any of these individual impacts are exacerbated by the combination of all of them. However, Chapter 18.2 of the DEIR lists, in one place, all the significant unavoidable impacts of the project, and Chapter 2 of the DEIR summarizes all impacts of the project, which can be considered collectively in the decision over approval of the project.

BASE-TO-BASE GONDOLA PROJECT

At the time that the NOP was released, and even by the time the DEIR was released (in May 2015), there had been no formal submittals to the County or the U.S. Forest Service (USFS) regarding the Base-to-Base Gondola project, so it was not considered "reasonably foreseeable" and there was only limited information about the nature of the project. Since the DEIR was prepared, an application has been submitted to the County (October 15, 2015). In addition, a project proposal letter was submitted to the USFS in July 2015 for the portion of the Gondola on USFS land. These submittals include an initial description of the project, which is summarized below.

The Gondola is designed to connect two ski areas, Alpine Meadows and Squaw Valley. Skiers would be able to board the Gondola at the base terminal in Squaw Valley and ride to the base of Alpine Meadows, or vice versa. They may also be able to disembark at one of the mid-mountain stations. As currently proposed, the Gondola would have a design capacity of approximately 1,400 persons per hour in both directions. Each gondola car would carry up to eight passengers. In total, the lift would be approximately 13,000 feet in length (based on slope length). Approximately 25 percent would be located on USFS land that is leased for the Alpine Meadows ski resort and the remaining 75 percent would be on private land. The Gondola would

operate only during the ski season, from shortly before the ski lifts open each day until shortly after they close. No new public or private lands would be opened to use as a result of the Gondola project.

The Gondola project would also install up to eight Gazex exploders in Alpine Meadows for avalanche control. The Gazex exploders use propane and oxygen gas to ignite in a controlled volume explosion within a metal tube, creating a concussive blast above the snow surface in key avalanche trigger locations. The Gazex exploders would reduce the amount of artillery and hand charges that are currently used for avalanche control at Alpine Meadows.

Because it would be located on private and USFS land, the Gondola would require a Conditional Use Permit and CEQA clearance from the County, and a Special Use Permit and NEPA clearance from the USFS.

If the Gondola had been proposed prior to publication of the DEIR, it could have been included in the VSVSP cumulative impact analysis. Because it is so early in the process, no formal studies have been submitted for the Gondola. Nonetheless, based on what is known at this time, the addition of the Gondola would not have substantially altered the conclusions of the DEIR with respect to cumulative impacts for a number of reasons.

Construction of the Gondola would disturb a relatively small area—a maximum of approximately 3.5 acres—so it would not substantially increase the total area that would be disturbed by construction in Squaw Valley and the region. The construction period would be relatively short, less than two seasons, so there would be no ongoing construction emissions, noise, or related impacts. Furthermore, construction activities would be subject to the same laws and regulations regarding environmental review, wetlands, erosion, noise, etc. that development projects must follow, so construction impacts would be mitigated.

The terrain and geology of the Gondola project area is very different from that of the VSVSP plan area because much of it is located on steep slopes, in some cases with minimal vegetation. Therefore, most of hydrological, geological, biological, and cultural resources would differ from those of the VSVSP plan area, and therefore the impacts would differ.

The Gondola would not include any accommodations, so it would not increase the residential population of the Valley. The Gondola is intended to ferry skiers between Alpine Meadows and Squaw Valley so that they do not need to drive between the two ski resorts. Consequently, it is not expected to substantially increase the number of day skiers within either resort. Because it would provide an alternative to driving between the resorts, the Gondola could reduce traffic on roads evaluated in the DEIR, such as SR 89 and Squaw Valley Road, because skiers would not need to drive or take the shuttle in order to ski at both resorts on a single day. In a recent survey by LSC Transportation Consultants, Inc., Squaw Valley and Alpine Meadows guests were asked how likely they were to use the proposed Gondola to connect and ski between the two resorts on a single day (LSC 2015). Of those surveyed, 43 percent said that they would use the Gondola “all the time” or “most of the time.” LSC estimates that the proposed Gondola could reduce daily traffic volumes by approximately 100 vehicles along SR 89 (between Squaw Valley and Alpine Meadows), and that traffic would be reduced on Squaw Valley Road as well. Therefore, the Gondola would not be expected to increase cumulative traffic impacts. If the Gondola reduces trips between the two resorts, it would also have a commensurate effect on cumulative impacts related to air quality, noise, and greenhouse gasses.

ALPINE SIERRA PROJECT

The Alpine Sierra Subdivision project is included in Table 18-2 of the DEIR (see map number 10) and considered in the project’s cumulative impact analysis. This project would include 33 single-family residential units and 14 residential halfplex units on approximately 45.5 acres located north of the Alpine Meadows Ski Resort and generally south of the Bear Creek Association neighborhood and John Scott Trail Road.

WHITE WOLF PROJECT

The White Wolf property is located between Squaw Valley and Alpine Meadows. While the proposed Gondola project would be partially constructed and operated within the White Wolf property, the White Wolf project, though publicly announced, has not been submitted to the County. Because no application had been submitted to the County the project was not reasonably foreseeable at the time of DEIR preparation. In addition, no application has been submitted as of the preparation of this FEIR.

STANFORD CHALET SUBDIVISION PROJECT

Located in Alpine Meadows, the Stanford Chalet Subdivision project includes removal of the existing Stanford Chalet and development of 18 halfplex residential units on an existing commercial facility of 2.5 acres. This project was not included in the DEIR cumulative project list because an application to the County was not submitted until April 20, 2015, well after the January 2014 NOP circulation. Furthermore, due to the late stage of production for the VSVSP DEIR (the DEIR was circulated on May 18, 2015) inclusion of this project was not timely as the preponderance of DEIR analyses had already been completed.

3.1.11 Master Response: Occupancy Assumptions

Several comments questioned the project occupancy assumptions used in the DEIR. The occupancy assumptions are important because they lay a foundation for determining some of the project impacts, especially those impacts that are based on annual demands for utilities. For example, the environmental issue most critiqued by commenters, water demand for the project, is principally based on the percent occupancy of facilities, by month and consolidated for the year. An average annual occupancy rate of approximately 55 percent was assumed for various elements of the project analysis (a rate of 55.2 percent was used, as described in Attachment A to Appendix C of the DEIR; for purposes of this discussion, it is rounded to 55 percent). In some cases, such as water demand, monthly averages were used, reflecting the seasonality of the project. Aside from utilities, the only issues that are based on average annual occupancy are hydrology/biology impacts linked to groundwater use, and greenhouse gases, because this issue is tied to annual energy consumption. Other issues linked to project-related demand, such as traffic, noise, and air quality, are tied more closely to peak project use (rather than an average demand), which reflects those days when the project and surrounding roads are busiest.

Specific comments related to occupancy assumptions include:

- The hydrology and public services sections of the DEIR appear to use an occupancy rate of 55 percent, and this is based on surveys conducted during an economic recession period of 2009 to 2011.
- The applicant has stated a primary project objective is to turn Squaw Valley into a year-round resort destination and, therefore, an occupancy rate higher than 55 percent should be assumed.
- Unless the applicant is prepared to agree to a condition to limit occupancy to 55 percent, the DEIR must assume full occupancy at all times of the year for its impact analysis. If the County believes a lower than full occupancy is more realistic, the EIR should evaluate both full occupancy and the lower predicted level.
- The water supply analysis should use an 80 percent higher demand than used in the DEIR, based on full occupancy (100 percent annual occupancy instead of 55 percent).

CEQA REQUIREMENTS

CEQA requires that lead agencies determine whether a project may have a significant effect on the environment. “The decision as to whether a project may have one or more significant effects shall be based

on the substantial evidence in the record of the lead agency." (CEQA Guidelines Section 15064[f]) Reliance on substantial evidence is the foundation of the analytical requirement of CEQA. Substantial evidence is defined as "facts, reasonable assumptions predicated on facts, and expert opinion supported by facts." (CEQA Guidelines Section 15064[f][5]) CEQA also states what is *not* considered substantial evidence: "Argument, speculation, unsubstantiated opinion or narrative, or evidence this is clearly inaccurate or erroneous, or evidence that is not credible, *shall not constitute substantial evidence*." (*Ibid*, *emphasis added*) Simply stated, the conclusions surrounding the determination of environmental impacts must be supported by reasonable factual data.

Thus, the analysis of significant impacts in the EIR must rely on substantial evidence, including evidence with respect to the degree to which resources are expected to be used or consumed, such as water. As will be explained further in this analysis, the assumptions surrounding the occupancy of the project and consumption of water are based on substantial evidence in the record and are conservatively evaluated (in the context of this response, the term "conservative" is used to describe assumptions or impact evaluation methodologies leading to conclusions greater than what is considered most likely to occur). Most importantly, the potential for environmental impacts and the accompanying need for mitigation are also based on this substantial evidence. On the other hand, there is no substantial evidence provided, in comments or elsewhere in the record, that a higher annual occupancy rate should be used. We note that some isolated data shows that, in other comparable facilities in the U.S., annual occupancy has peaked above 55 percent in isolated years (hitting a high of 61.6 percent one year between 2002 and 2014 in one data set). However, in no instance does data suggest that average annual occupancy above 55 percent is realistic, and further suggest that even 55 percent is a conservative annual occupancy rate assumption. As it relates to water, a factor that assumes higher than anticipated consumption was assumed with respect to water demand (e.g., no use of current water conserving device standards, utilization of demand factors based on historic use rather than more efficient building code requirements, etc.) to reasonably evaluate the potential impacts of the project, and cumulative development, on this resource, with a margin of safety given its importance (see page 14-31 in the DEIR for further discussion). Further, the water supply assessment (WSA) and other groundwater related analyses used monthly averages to reflect seasonal changes in water demand (i.e., higher demand in August than in November).

Other environmental issue areas that rely on population estimates are similarly correctly evaluated. For instance, the traffic analysis focused on peak (rather than average) use, as is typical for traffic analyses. This approach is highly conservative; these occasional peaks are used to determine significant impacts and resulting mitigation measures, even if the impacts only occur several days of the year. The noise analysis was also based on peak traffic; noise would only exceed standards a few days of the year, during peak summer traffic, but the impact is considered significant in the DEIR. Other impacts, such as biological impacts that are based on project land conversion, do not rely on occupancy.

SHOULD THE EIR EVALUATE A WORST-CASE SCENARIO?

Prior to reviewing the substantial evidence used in the DEIR to support the occupancy assumptions, the concept of using a higher occupancy, or full occupancy, warrants consideration in response to comments on this issue. This falls within the argument that a "worst-case" scenario should be evaluated. The principle that the EIR must include "worst case" analysis is incorrect. Rather, an EIR should reflect a good faith effort to forecast what the lead agency expects to occur in the event the proposed project is approved. (CEQA Guidelines Section 15144; *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 373, citing *Towards Responsibility in Planning v. City Council* (1988) 200 Cal.App.3d 671, 681. Cf. *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1453 [lead agency can make reasonable planning assumptions about future development, and need not assume maximum conceivable development].) Nevertheless, the question remains as to whether it is reasonable to consider various commenters suggestions that the DEIR analysis assume a higher rate of occupancy, up to full occupancy, in determining the environmental impacts of the project?

Assuming full occupancy of the project would mean that the environmental impacts of the project that are tied to occupancy would be calculated to be much higher than the DEIR determined they would be. Full occupancy would mean that project would operate with 80 percent higher occupancy than the DEIR assumed on an annualized basis. (Full occupancy at 100 percent is 80 percent higher occupancy than 55 percent.) If water consumption was commensurately 80 percent higher),[1] water use for the project in 2040 (full buildout) would be an estimated 421 acre-feet per year (AFY) rather than the 234 AFY estimated in the DEIR (see page 14-32)[2]. Adding in other cumulative growth (129 AFY, see page 14-31[3]), total water demand would increase by 550 AFY by 2040 (instead of 363 AFY). Existing plus cumulative water demand would be 1,392 AFY in 2040, instead of 1,205 AFY as stated in the DEIR (page 14-32), or 16 percent higher. However, if the commenter's suggestion of 100 percent annual occupancy was also applied to other future projects in the Olympic Valley that make up the cumulative development scenario, the existing plus cumulative water demand would be even higher.

The comments on occupancy rates do not provide evidence that the proposed project would experience occupancy rates higher than those used in the DEIR analysis, other than the statement that the applicant desires to provide for a year-round resort, as further detailed below. If higher occupancy than substantiated (and supportable) is assumed, assumed impacts of the project would likely increase, leading to over-mitigating for such issues infrastructure impacts (water use, water infrastructure and wastewater conveyance, for example), again leading to the potential for growth that consumes the future unused capacity from over-building infrastructure.

Finally, introduction of an unsubstantiated worst-case analysis would subvert the intention of CEQA: to make informed decision-making. The EIR is required to disclose environmental impacts, based on substantial evidence, and allow decision makers the opportunity to determine the environmental implications of their decision to approve or deny a project. The environmental review process under CEQA is not made better by overstating, or understating, potential environmental impacts. Overstating an impact can lead to various undesirable consequences, including unsubstantiated and unreasonable mitigation burdens. Understating impacts can lead to unmitigated environmental impacts. Thus, EIRs must focus on basing impact conclusions on substantial evidence in the record. As explained below, the County believes the EIR reflects such an approach.

EVIDENCE SUPPORTING OCCUPANCY DATA USED IN THE DEIR

Potential monthly and annual occupancy rates for the project were initially developed for a water demand analysis prepared by a registered professional engineer, Ken Giberson of MacKay & Somps. MacKay & Somps prepared this information on behalf of the applicant. However, the substantiation behind the occupancy assumptions was independently reviewed by SVPSD staff, and by Placer County and its consultants, as part of this EIR, and adjustments were made in response to this review.

As stated on page 4-2 of the WSA, Appendix C of the DEIR, MacKay & Somps based occupancy rates on 2009 through 2011 occupancy rates, by month, at Squaw Valley Village and other resort industry data (incorporating five other properties in Squaw Valley, including the Resort at Squaw Creek, Squaw Valley Lodge, PlumpJack, Squaw Valley Inn, Olympic Village Inn, and Red Wolf Lodge). As further detailed in Attachment A to Appendix A of the WSA, these data were inflated by 5 percent per month to reflect expected project occupancy. Occupancy in the month of August was inflated by 10 percent compared to the 2009-2011 data to reflect higher expected visitation due to greater year-round amenities. A month-by-month calculation of occupancy was provided, with occupancy as low as 26 percent in November and as high as 85 percent in July. The average annualized occupancy derived from this analysis is the 55 percent occupancy

[1] It would not be. Facilities such as the Mountain Adventure Camp were assumed in the analysis to already operate at full occupancy and landscape irrigation would also remain constant regardless of occupancy.

[2] 421 AFY = 234 AFY + (234 AFY x 80 percent)

[3] In this instance the cumulative growth occupancy was assumed to remain at historic rates, inflated by the same 10 percent as the project, and averaging 55 percent on an annualized basis. No comments were provided to suggest that all lodging in Olympic Valley should be inflated to 100 percent throughout the year.

number cited. The 55 percent occupancy assumed for the project is 10 percent higher than the average 50 percent annual occupancy reflected in the 2009-2011 data. (Note: 55 percent is 10 percent higher than 50 percent; one needs to increase the number of occupants by 10 percent to grow occupancy from 50 percent to 55 percent.) Further, the WSA was updated following release of the DEIR, including review of occupancy data from 2008-2014. The SVPSD decided to base the updated WSA on an annual average occupancy rate of 56.3 percent (instead of 55.2 percent), an occupancy increase of 2.2 percent. This difference is discussed later in this response.

As context, historic occupancy rates are informative, but also important is the fact that the project would add up to 1,493 new bedrooms for visitors. Based on current estimates of persons per bedroom (1.6 per managed condo or hotel as currently experienced in the Valley, see page 5-2 of the DEIR), in order to achieve 55 percent occupancy, the project would need to grow overnight visitation to the resort by approximately 1,315 overnight guests per day (on average) or 480,000 per year (1,493 rooms, 1.6 persons per room, 365 days per year, 55 percent occupancy). Thus, any projection of occupancy has to factor in a substantial increase in daily visitation. In other words, occupancy of existing units in Olympic Valley provides context, but the projections need to consider substantial growth in the number of people visiting Olympic Valley if the project is to match current occupancy levels, plus the 10 percent growth in occupancy assumed in the EIR.

In addition to intentionally inflating the occupancy data from historic rates to provide a conservative estimate, the water demand estimates used in the analysis are higher, per capita, than would be expected. The data used historic unit demand data for existing single-family residential, commercial, resort, etc. uses in Olympic Valley, and do not account for the relative water efficiency that will accompany compliance with current building codes, which result in much less expected use per capita than historic uses. That is, although the DEIR might have assumed lower per-capita water demand, it did not, and thus erred on the side of a conservative analysis. This is explained on page 14-31 of the DEIR:

> Water demand in the lodging, housing, and commercial units were derived from historical use in Olympic Valley. These unit demand values represent conservatively high estimates of future water use and do not include any reductions to account for less per-capita water use, based on compliance with existing codes, in new construction/retrofits in older buildings or demand reductions resulting from drought conditions. These conservative demand assumptions are:
>
> - high unit demand values for all future development;
> - no reductions in future demand to account for State, County, and SVPSD-implemented water demand reduction measures; and
> - no assumed reduction in water demands during drought.

The comments criticized the use of 2009-2011 data as a starting point for project occupancy, pointing out that this was during an economic recession. While one would expect resort visitation to be affected by economic recession, it predates the data used in the analysis. The recession, commonly termed the “Great Recession,” officially began in December 2007 and ended in June 2009, according to many sources including the National Bureau of Economic Research (National Bureau of Economic Research 2015). Many people acknowledge recovery from this recession was slow, but correlating the speed of recovery from a global recession to project occupancy is beyond the reasonable scope of this analysis. Other data were used, however, to corroborate the reasonableness of the assumed project occupancy, as discussed further below.

The weighted average (weighting to match existing Valley product type proportions to proposed project product proportions) occupancy of the six properties in Squaw Valley considered in the WSA from 2008 to 2014 is 50.4 percent. For instance, greater weight was given to occupancy of the Resort at Squaw Creek and the Village at Squaw Valley than to Red Wolf lodge, because the pricing and product type of the former two properties are more comparable to proposed project unit types than the older, and less amenity-rich Red Wolf. During this period, annual occupancy at the Village at Squaw Valley ranged from a low of 34.7 percent

to a high of 51.8 percent; the Resort at Squaw Creek ranged from a low of 45.6 percent to a high of 55.1 percent; and Squaw Valley Lodge ranged from a low of 38.7 percent to a high of 51.6 percent. Other properties in the survey, especially Red Wolf Lodge, fared better (low of 75 percent to a high of 100 percent), but these relatively low priced property types are not reflective of the proposed project, even if they factored in to the overall occupancy assumptions used in the WSA. (Squaw Valley Real Estate 2015.)

An additional source of corroborating data that spanned a longer period and considered a much larger sample set, including other parts of North America, was derived from Smith Travel Research, a firm that provides benchmarking data to the hospitality industry. Comparable resort type data were provided based on four sets of comparable product types: "unbranded" (examples: Viceroy Snowmass, Beaver Creek Lodge), "branded" (examples: St Regis Aspen Resort, Four Seasons Resort Vail, Ritz-Carlton Lake Tahoe, several others), "comparable" property groups (examples: Keystone Lodge & Spa, Vail Cascade Resort, Resort at Squaw Creek), and "boutique" resorts (examples: Sundance Resort, The Little Nell). The data sets included between 5 and 14 resorts in each group. The annual average occupancy for each property group type averaged from 46.1 percent (boutique) to 52.5 percent (branded set) over a 13-year record. Data was provided for the years 2002 through 2014. Occupancy across all property groups ranged from 44.7 percent (in 2009), to a peak—in one year—of 61.6 percent (2007). One product type, the boutique resorts, had a very low 2009 occupancy of 33.6 percent, but this is an outlier. In 2006, the occupancy across the comparable properties group was 56.3 percent. These are the only years that any of the comparable groups of properties exceeded the 55 percent projection used for the project, and the annual averages hovered around 45 to 53 percent for the 13-year period of record (Smith Travel Resort 2015). Note that the DEIR assumes an annual average occupancy of 55 percent, meaning that some years could be higher, others lower.

In summary, the analysis of potential occupancy was robust and well substantiated. No local data suggest that occupancy above 55 percent would be reasonably expected. Further, national data show that comparable resorts experience similar occupancy rates, albeit on average lower, with an expectation of up to 53 percent at the highest end. Based on the review of the data, the DEIR used a reasonable annual average occupancy rate of 55 percent. This rate is reasonably conservative, and it provides a reasonable basis for determination of project impacts associated with occupancy, particularly with respect to water demand projections and related impacts that assume both the 55 percent occupancy and higher than expected per capita water use.

Further, no substantial evidence was provided in comments to suggest that the occupancy rate should have been higher. The comments' suggestions that a higher occupancy rate should be assumed, and that full occupancy should be an included analysis, do not comport to the evidence in the record. Further, there is no support in the comments, or anywhere else in the record, that the project warrants a condition restricting occupancy to 55 percent per year. An average annual occupancy above this level is not reasonably foreseeable.

With respect to two data points, the 56.3 percent occupancy assumed in the updated WSA and the 61.6 percent single year peak at a comparable resort data set described above, we offer the following considerations.

- **2015 WSA Update Use of 56.3 Percent:** This 2.2 percent increase in assumed occupancy for the WSA provides a marginally more conservative basis for assurance that water can be adequately supplied over the period of record (25 years) evaluated in the WSA. Given the critical nature of water supply, the additional assumed demand that goes along with this increase in average occupancy, along with the other conservative assumptions in the WSA (as described above) provide a greater buffer of safety. This does not, in any way, suggest the 55 percent annual occupancy, in light of the data above, is not supported by substantial evidence of should otherwise be adjusted. Issues affected by the increase in water use based on the 2015 WSA update are associated with biology and hydrology as they related to groundwater. See the Master Response regarding water supply for an updated analysis of these issues.

  The only other issue that could be affected by the increase in occupancy to 56.3 percent, if the EIR was updated to this higher occupancy, is greenhouse gases. Table 16-2 of the DEIR showed calculations

associated with GHG emissions, and this table is replicated below as Table 3-9, showing the differences if the 56.3 percent occupancy was assumed. Please note that this table and the data is further refined in the Master Response regarding the GHG analysis. As shown compared to the DEIR analysis, GHGs associated with vehicle trips, propane consumption, electricity consumption, water consumption (due to rounding, no change is shown in the table), wastewater treatment, and solid waste generation would be affected by the occupancy increase. GHG emissions would be 953 metric tons of carbon dioxide-equivalent (MT CO_2e) higher if this average occupancy rate was used compared to the DEIR, 2 percent above what is stated in the DEIR. The DEIR's conclusion regarding significant impacts would remain; the project would exceed the PCAPCD threshold of 1,100 MT CO_2e/year. Further, see the Master Response regarding the GHG analysis regarding an overall reduction in estimated project GHG emissions (which would result in emissions well below these estimates) as a result of updated GHG and utility information.

Table 3-9 Summary of Annual Greenhouse Gas Emissions Associated with the Specific Plan at Full Buildout in 2037 (Modified from DEIR Table 16-2)

Emissions Activity	MT CO_2e/year, 55.2% Occupancy (DEIR)	MT CO_2e/year, 56.3% Occupancy (Updated WSA)
Vehicle Trips (mobile sources)	14,241	14,524
Propane Combustion	19,732	20,125
Electricity Consumption	10,941	11,214
Water Consumption	25	25
Wastewater Treatment	147	149
Solid Waste Generation	92	94
Landscaping Equipment	10	10
Snow Removal Equipment	56	56
Construction[1]	118	118
Loss in Carbon Sequestration from Vegetation Removal[1]	40	40
Total Maximum Yearly Emissions	**45,403**	**46,355**
PCAPCD's Tier 1 Threshold of Significance	1,100	1,100

Notes: See Appendix H of the DEIR for detail on model inputs, assumptions, and project specific modeling parameters.
MT CO_2e/year = metric tons of carbon dioxide-equivalent per year
[1] Construction emissions and the loss in sequestered carbon from removed vegetation are amortized over an estimated 25-year build out period of the Specific Plan.

Source: Modeling conducted by Ascent Environmental in 2014; relevant categories increased to 2015 based on proportion between 55.2 and 56.3% occupancy

- **Peak Year Considerations:** As described above, one of the comparable properties had a single year peak occupancy of 61 percent. Because this is evidence of a potential one-year outcome, and because the Olympic Valley Groundwater Basin is heavily influenced by annual demand (the basin fills up rapidly and drains substantially each year, as described in the WSA), an analysis of a single year 61 percent occupancy was conducted. As described in the Master Response regarding water supply, sufficient water can be provided under this scenario, if it were to occur, in all water supply scenarios evaluated (normal year, single, and multi-year droughts over 25-year cumulative horizon). This is not an expected condition, but was evaluated because outlier data showed that this rate of consumption did occur for one year at a comparable North America property set.

3.1.12 Master Response: Mountain Adventure Camp

Numerous comments state that the proposed the MAC, a component of the project, is not compatible with the surrounding area, would use too much water and energy, would discharge polluted water to Squaw Creek and the Truckee River, and would contribute to already significant traffic impacts due to increased trip generation. In addition, some comments stated that one or more alternatives should not include the MAC. These issues are discussed below. A number of comments also indicated opposition to the inclusion of the MAC within the VSVSP, without a specific concern regarding the DEIR analysis. The comments that simply provide an opinion regarding the merits or qualities of the MAC without addressing the content, analysis, or conclusions in the DEIR will be taken into consideration by the Placer County Planning Commission and Board of Supervisors when making decisions regarding the project.

The MAC is described on pages 3-13 and 3-15 of the DEIR. Consistent with a Specific Plan and a program EIR, the MAC is described programmatically, including the maximum square footage and the range of activities that could occur there. As described on pages 3-13 and 3-15 of the DEIR, the 90,000-square-foot MAC would be located in the main Village area and would offer an extensive indoor/outdoor pool system as well as additional entertainment options, food and beverage facilities, and group meeting venues. Additional details about allowable uses are provided in Table 3.3 of the Specific Plan, and in Figure B.8 of Appendix B of the Specific Plan, which specifies building heights, lot coverage, and open space requirements for the MAC.

COMPATIBILITY WITH SURROUNDING USES AND THE OLYMPIC VALLEY

A number of comments stated that the MAC would not be an appropriate use for the Olympic Valley, and/or would not be compatible with the existing environment. For the most part, these comments object to the size of the MAC, to the proposed uses, and/or to its environmental impacts. The comments will be forwarded to and considered by the Board of Supervisors.

As stated on page 4-25 of the DEIR, the project would expand on existing similar uses within the plan area, and would not be expected to result in new long-term land use conflicts. Such conflicts can occur when sensitive receptors, such as schools, residences, churches, or parks are located adjacent to more disruptive uses, such as heavy industry or regional commercial centers where traffic levels or noise may be disruptive to neighbors. The MAC would have both internal and external activity areas, but would be separated from existing residences and the meadow/golf course by other project buildings, parking structures, Squaw Creek, and Squaw Valley Road. Therefore, residents of nearby neighborhoods would not be expected to be disturbed by activities within or outside of the MAC.

The MAC would introduce new year-round recreational activities into Olympic Valley, such as indoor swimming pools, bowling allies, a climbing wall, and movie theatres. Such recreational activities can be found in many small communities, and are of similar or smaller scale than existing recreational activities in the Valley, most notably skiing and the golf course. Most comments express concern that the MAC would provide indoor recreation within an area that possesses outstanding outdoor recreation opportunities. This is a comment on the suitability of the MAC in a mountain environment, and does not provide substantial evidence supporting a claim that the MAC is incompatible with surrounding land uses.

Some comments question the need to create a single, large recreational facility rather than distributing recreational amenities throughout the Village area. The project proposes to contain a wide range of summer and after-ski recreational facilities in a single building to create an attractive amenity that can be used year-round and irrespective of weather conditions. Because of this need for flexibility, they must be largely enclosed. By locating the various amenities within a single building, rather than throughout the Village, access is easier for guests (who might otherwise be exposed to unfavorable weather conditions, for example). The applicant has expressed that controlling access is also necessary to ensure that the MAC is a viable commercial venture. It should be noted that the VSVSP does not concentrate all recreational

amenities within the MAC. The VSVSP provides for a number of key recreational improvements outside of the MAC, including an ice rink, trail improvements, the Squaw Creek interpretive area, and recreational amenities, such as fitness facilities, within proposed hotel/condo buildings. From a CEQA perspective, however, this is of little interest outside of whether the MAC results in significant impacts that could be lessened with alternatives. There is no evidence that distributing the MAC's recreational amenities throughout the VSVSP area would not lessen any significant impacts, except that the MAC itself would not be as large. This issue is addressed in the next portion of this discussion.

MAC SIZE

A number of comments object to the size and height of the MAC and/or suggest that its height should be reduced to be more similar to the existing Village. The visual impacts of the project, including the MAC, are fully analyzed in Chapter 8, "Visual Resources," of the DEIR. Initially, the MAC was planned to be 132,000 square feet and up to 120 feet tall (see October 12, 2012 Notice of Preparation and December 2012 VSVSP). Since the early submittals, the maximum size of the MAC has been reduced to 90,000 square feet, and the maximum height has been reduced to 108 feet, with a maximum height of 84 feet for about half of the building (a portion of the building must be 108 feet to accommodate certain amenities). As shown in Exhibit 3-5 of the DEIR, the conceptual plan shows that the MAC would be surrounded by lodging buildings and the parking structures. The MAC would be the tallest building at 108 feet within the VSVSP, but as shown in the photosimulations, it generally does not stand out because of relative heights of other buildings and its location within the viewshed relative to other project development.

- The MAC is most prominent in Viewpoints 3 (Exhibit 8-11) and 4 (Exhibit 8-12), where the MAC is located on the left side of the simulation. While it blocks the lower slope of the mountains in the background of the viewshed, lowering the height by 15 or 20 percent (lowering tallest buildings by around 20 feet) would not substantially change the nature or extent of the view blockage.

Other examples of the MAC and its relative visibility are:

- Viewpoint 5 (Exhibit 8-13): the MAC is behind the first set of buildings to the right of the area in shadow (it is in the sunny part of the photo); the only part of the MAC this is visible is the roofline that is slightly higher than the rooflines of buildings in front.

- Viewpoint 6 (Exhibit 8-14): the MAC is behind the second set of buildings in the left side of the simulation; only the MAC roofline is visible, behind buildings located in front of it.

- In other simulations (Viewpoint 1, Exhibit 8-9; Viewpoint 2, Exhibit 8-10; Viewpoint 7, Exhibit 8-15; Viewpoint 8, Exhibit 8-16; Viewpoint 9, Exhibit 8-17; Viewpoint 10, Exhibit 8-18; and Viewpoint 11, Exhibit 8-19), views of the MAC are either blocked by intervening project structures or blend into the overall project viewshed.

As part of the VSVSP, the MAC would contribute to the change in views and visual character of the plan area (see Impacts 8-1 and 8-2), which the DEIR found to be significant and unavoidable impacts. However, removal of the MAC, or even a reduction in its height to the same level as the surrounding VSVSP buildings, would not avoid this impact, nor substantially lessen it, because the other VSVSP buildings would remain visible, as shown in the photosimulations. Perhaps the most substantial change would be if the MAC was entirely removed from Viewpoints 3 and 4, in which case a relatively small part of the viewshed, part of the lower slopes of the background mountains, would no longer be blocked. However, the majority of the views of the lower slopes in this viewshed would still be blocked by the rest of the project, and the impact would remain significant and unavoidable.

TRAFFIC

A number of comments assert that the DEIR underestimates the number of vehicle trips to be generated by the MAC, and state that traffic related to the MAC would occur in both winter and summer, during the day and at night. These comments do not provide information on how or why any parts of the traffic analysis related to the MAC might be in error.

The traffic impacts of the VSVSP as a whole, including the MAC, are analyzed in Chapter 9, "Transportation and Circulation," of the DEIR. Impacts are evaluated for winter and summer peak hours, consistent with applicable standards for impacts on transportation facilities (see pages 9-3- through 9-32). The methods and assumptions used in the analysis of traffic impacts are discussed on pages 9-32 through 9-55 of the DEIR. As explained on page 9-34, the vast majority of customers are expected to be persons already staying on site or extending the length of a day skier visit, so external trips for the MAC would be primarily the result of employee trips and occasional customers traveling to Squaw Valley solely to use the MAC. As stated on page 9-37 of the DEIR, trip generation for the MAC was based on the anticipated number of guests and employees, expected shift times, and winter overnight guest and employee surveys regarding travel patterns, mode split, vehicle occupancy, and internal trips.

To further evaluate trip generation specific to the MAC, a detailed trip generation study focused exclusively on the MAC was performed by LSC Transportation Consultants, Inc. (LSC 2015) and is included as Appendix E of this FEIR. This study has been peer reviewed by County staff and the County's consultant team. The LSC study utilized information included in a market feasibility study for the MAC prepared by Hotel and Leisure Advisors, Inc. for Squaw Valley Real Estate LLC. The market feasibility study concluded, based in part on conditions at several existing indoor water parks, that the financial success of the MAC would depend on a high proportion of guests that attend the MAC doing so as part of a hotel package (i.e., lodging stay and MAC tickets marketed as a combined package). The study further mentions that it is necessary to provide priority treatment at the MAC for lodging guests in terms of purchasing passes, hours of operation, and control of crowding. The applicant has a vested interest in seeing the MAC be a successful venture. Accordingly, they are committed to operating it with tight controls on busy summer and winter days to provide a high-quality experience to lodging patrons using the facility. It would therefore be expected, during peak lodging occupancy periods (which would correspond with the busiest peak traffic periods), that the capacity of the MAC would be filled primarily by lodging guests, and opportunities would be limited for non-lodging guests to obtain tickets to the MAC. These limitations on access by non-lodging guests would greatly reduce potential traffic generation of the MAC during peak traffic periods. The LSC study concluded that, during peak occupancy months, an average of 86 percent of visitors would be those with hotel/MAC ticket packages or otherwise lodging in the project area, 10 percent would be other regional visitors, and 4 percent would be regional residents. Based on these conditions, the MAC would generate approximately 150 new winter daily trips and 140 new summer daily trips (this includes employee trips) per season. The Winter Saturday AM peak hour, Winter Sunday PM peak hour, and Summer Friday PM peak hour trip generation would be 4, 14, and 19 trips, respectively. The DEIR estimated 7, 10, and 10 trips for Winter Saturday AM peak hour, Winter Sunday PM peak hour, and Summer Friday PM peak hour, respectively (see Tables 9-18 and 9-19 in the DEIR). In all cases, the difference between the LSC study and the DEIR traffic analysis is less than 10 peak hour trips, which is not of sufficient volume to affect any study conclusions. Therefore, the LSC analysis of MAC traffic generation further supports the analysis included in the DEIR. Because the comment provides no detailed information on how or why any parts of the DEIR traffic analysis related to the MAC might be in error, and the LSC study provides further evidence suggesting the DEIR analysis is accurate, no further response is required.

WATER USE

A number of comments state that the MAC is an inappropriate use because it would require substantial amounts of water, and/or that the alternatives should include elimination of the MAC to reduce or avoid impacts on water supply. The MAC does provide for indoor and outdoor swimming pools and other water features. The impacts on water supply of the MAC were analyzed in the DEIR, because the water demand for

the MAC was included in the water demand calculations used in the 2015 WSA update. Total water demand for the MAC would be approximately 37 acre-feet per year (AFA), or approximately 15 percent of total water demand. Because the 2015 WSA update found that this demand, as part of the project, could be met through 2040, it was not necessary to eliminate the MAC to address impacts on water and/or develop an alternative that addressed a reduction in water demand. As discussed below, there are alternatives evaluated in the DEIR that do not include the MAC.

For response to water supply and groundwater pumping impacts of the VSVSP in total, see the Master Response regarding water supply.

WATER QUALITY

One comment suggested that the MAC's indoor/outdoor water based recreation would pollute local surface waters by releasing chlorinated water to Squaw Creek and the Truckee River. Wastewater, including water used for the MAC swimming pools, would be discharged to the SVPSD sewer system and treated at the Tahoe-Truckee Sanitation Agency (T-TSA) wastewater treatment plant in Truckee. The estimates of wastewater generation for the VSVSP included the MAC. As discussed on page 14-36 of the DEIR, the treatment plant has capacity to accept VSVSP wastewater. The T-TSA treats wastewater with a number of processes, and then disposes of the treated effluent on land, where it percolates to the ground. Therefore, VSVSP wastewater, including water from the wet amenities, will not be discharged to Squaw Creek or the Truckee River.

ALTERNATIVES

Several comments stated that the alternatives analysis should include alternatives that eliminate the MAC. In one comment, it was suggested that the MAC facilities could be distributed throughout the VSVSP plan area, rather than contained in a single building, and the need for a large recreational facility within a single building to achieve the project objectives for becoming a year-round, destination resort was questioned.

As stated on page 17-11 of the DEIR, the elimination of the MAC while retaining all other aspects of the VSVSP was not considered in the DEIR because, the MAC in and of itself would not avoid or substantially lessen otherwise significant and unavoidable impacts, and such an alternative would not meet the fundamental project objective of creating a year-round destination resort with sufficient size and services to be on par with peer world class North American ski destination. As discussed above, the MAC would contribute to the impacts of the VSVSP, such as increased water use, traffic, and visual impacts. However, eliminating the MAC would not substantially reduce these or other significant impacts, because the facility is not the only or even primary source of the impacts. Instead, these impacts are addressed by reducing total VSVSP development (e.g., the Reduced Density Alternative and the Preservation of Historical and Wetlands Resources Alternative). The MAC is not included in the No Project—SVGPLUO Development Alternative, and the Reduced Density Alternative includes a smaller MAC (50,000 square feet).

Regarding the statement that the MAC is not necessary to achieve the project objective of a world-class resort, the following information (the remainder of this paragraph and the next paragraph) is provided by the applicant (Hosea, pers. comm., 2015): destination ski resorts must provide a comprehensive, world-class, family resort experience to be competitive on an international stage. The difference between a ski resort and a destination ski resort is the breadth and quality of the experience, particularly for families, which are a key aspect of a ski resort's economic viability. Skiing and snowboarding are at the core of the experience, but most ski resorts can deliver quality skiing and snowboarding. What sets the most successful destination resorts apart are the non-ski attractions and amenities, which usually form the key components of a vibrant village. Of particular importance to the destination traveler are the après ski experiences. For a family with young children, it is most important to the parents that their children have exiting activities and entertainment after skiing and riding. The MAC is designed to provide a comprehensive après ski experience that firmly places Squaw Valley Resort in the competitive landscape of attracting family destination ski vacations.

Furthermore, to create a "top quality, year-round destination resort," as called for by the SVGPLUO, non-winter recreational activities are essential, and could become more important as climate change alters snow patterns in the Sierra. Skiers at Squaw Valley Resort have access to thousands of acres of high quality ski/ride terrain across all levels of difficulty. Therefore, the resort competes effectively with other regional non-destination ski resorts for the ski/ride customer. However, when the ski season ends, like many ski resorts, Squaw Valley Resort dismisses about 1,500 to 1,800 seasonal employees and struggles to preserve the winter earnings throughout the balance of the spring, summer, and fall. Other businesses in the Valley are similarly affected. The MAC is designed to fill the seasonal voids at Squaw Valley, attracting summer visitors to the resort, which in turn will provide more year-round opportunities for lodging, retail, restaurants, and mountain operations. In order to achieve this four-season resort objective, the MAC must be developed to the level of an attraction, not just an amenity. Therefore, the size and recreational content of the MAC is most important to achieving this objective.

3.1.13 Master Response: East Parcel

Several comments stated that the DEIR did not adequately analyze the impacts of developing the East Parcel with employee housing, shipping and receiving, parking, and a market. Primary concerns expressed by commenters and responded to specifically in this response are land use compatibility, noise, visual resources, and air quality. Each of these are addressed in more detail below. In addition, changes to the conceptual plan for the East Parcel are summarized.

For a discussion of impacts on cultural resources located in proximity to the East Parcel, see response to comment O11-13. For a discussion of vehicle ingress and egress to the East Parcel, see response to comment O11-6.

PROPOSED CHANGES TO THE EAST PARCEL

As discussed in Section 2.1, "Project Modifications," of this FEIR, the applicant has proposed changes to the East Parcel layout in response to concerns expressed by the Squaw Valley Design Review Committee and members of the public. Key changes that would affect the concerns raised in response to the DEIR are:

- The employee housing buildings that were proposed along the northern edge of the East Parcel have been relocated to the southwest portion of the project site, between the shipping and receiving building and the parking structure, as shown in revised Exhibit 3-6 in Chapter 2 of this FEIR.
- The shipping and receiving building has been shifted to the east, providing a setback from the western property line of 100 feet, an increase of 25 feet over the setback described in the DEIR.
- The parking structure setback along Squaw Valley Road has increased from 25 feet to 35 feet.
- The bike path has been relocated to the southern edge of the parcel, along Squaw Valley Road.
- Lot 44 will be zoned Village-Conservation Preservation instead of Entrance Commercial.
- An 8-foot masonry wall will be constructed along the northern perimeter of the development area. This wall would reduce noise, sight access, and potential trespass to/from adjoining parcels.
- The circulation pattern for trucks has been redesigned so that delivery trucks can significantly minimize back-up distances and reduce the activation of vehicle backup alarms.
- The parking garage has been redesigned to include three levels, but it will be partially subgrade in order to maintain a maximum building height (including barriers and architectural features) of 35 feet.

LAND USE COMPATIBILITY

A number of comments state that the proposed uses of employee housing, shipping and receiving, a small market, and parking are not appropriate for the East Parcel due to its proximity to residential uses and a school. As stated on page 4-1 of the DEIR, historically, the East Parcel has been used for snow storage and temporary equipment storage. As several comments point out, these existing uses do not involve buildings, housing, shipping and receiving, or a market. The DEIR evaluates the effects of constructing and operating these uses on the East Parcel. As discussed throughout the DEIR and below, the impacts of these uses could, for the most part, be mitigated to a less-than-significant level. Further, the current land use designation and zoning of the East Parcel is primarily Entrance Commercial (6.54 acres), which was intended to establish commercial uses compatible with the destination resort concept, the scenic corridor concept, and the adjoining residential areas (Placer County 1983:89). The remainder of the parcel is zoned High Density Residential (1.81 acres) and Conservation Preserve (0.47 acre). The uses that are allowed on the East Parcel under existing zoning include a range of retail uses, including grocery stores and liquor stores, multi-family housing, parking facilities, and accessory uses (Placer County 1983:90). In zoning the East Parcel Entrance Commercial and the surrounding areas as residential, the SVGPLUO implies that these types of uses are compatible with the surrounding residential uses.

The DEIR recognizes that the residential development adjacent to the East Parcel is a sensitive land use, and also specifically identifies the Tavern Inn (a condominium complex) and Squaw Valley Academy (a boarding and day school) on page 4-26. The DEIR concludes that there is the potential to create land use conflicts with surrounding areas, but explains that the East Parcel is a logical location for employee housing and is currently used for operations related to the ski resort. As stated above, current operations do differ from the proposed uses of the East Parcel because no buildings are located on the East Parcel. However, as discussed throughout the DEIR and below, the issues that typically underlie land use conflicts, such as construction activities, noise, and light and glare, have been thoroughly analyzed. With mitigation, the potential for land use conflicts would not be significant.

The revisions to the conceptual plan for the East Parcel described above would further minimize the potential for land use conflicts. The shipping and receiving building, the 8-foot wall on the northern perimeter of the developed area, and the eastern employee housing building would create a barrier between the interior of the East Parcel and surrounding areas. East Parcel activities would be oriented toward the interior, and the relocation of the bike path to the southern edge of the East Parcel would further reduce activity levels in proximity to existing residences. As a result of these changes, the noise, visual, air quality, and other impacts that can result in land use conflicts would be less than described in the DEIR, although not enough to avoid the need for identified mitigation measures.

The DEIR also addresses whether development of the East Parcel would divide an established community (Impact 4-1 on page 4-20). The DEIR observes that the East Parcel is already separated from residential and other uses to the north and south by Squaw Creek and Squaw Valley Road. There are no connections between surrounding developed areas that would be blocked by East Parcel development. To the contrary, by providing a Class I trail extension across the property frontage and constructing a Class II bike lane along the East Parcel Squaw Valley Road frontage, the proposed project would increase connectivity between areas in the vicinity.

NOISE-RELATED CONCERNS

The DEIR specifically addresses potential noise impacts at the East Parcel in Impact 11-3, and provides mitigation to ensure that noise levels do not exceed County standards. As discussed on page 11-25 of the DEIR, emergency electrical generators located within 150 feet of residential areas could generate noise levels that exceed County standards. It should be noted that emergency generators are tested and used infrequently. Mitigation Measure 11-3 requires that routine testing and preventive maintenance of emergency generators be conducted during the daytime (7am to 10pm), and that the generators be equipped with noise control devices. The revised East Parcel conceptual plan would further reduce noise impacts from emergency back-up generators, should any be constructed, by providing a minimum of 100

feet of separation between existing residential areas and project buildings, and by constructing an 8-foot masonry wall on the northern perimeter of the developed portion of the East Parcel. Furthermore, any backup generators that would be implemented at the East Parcel (or anywhere else within the plan area) would be located within a shelter or integrated into a building, as described in Section B.4.7 of the Development Standards and Design Guidelines, which would mitigate any potential noise impacts to nearby residences.

As stated on page 11-26 of the DEIR, parking lot noise could exceed County standards at 45 feet from the parking structure. The East Parcel parking structure would be located more than 45 feet from the nearest existing residence. In addition, the 8-foot masonry wall on the northern perimeter of the developed area, the employee housing to the east, and the shipping/receiving building to the west would buffer noise from the parking garage.

As indicated in a number of comments, noise sources associated with shipping and receiving could include truck idling, beepers/reverse alarms, onsite circulation, trailer mounted refrigeration units, pallets dropping, and forklift operations. These noise sources are evaluated on page 11-26 of the DEIR. As identified in the DEIR, the County's daytime noise standards could be exceeded at 200 feet from the acoustic center of a loading dock, and night time standards could be exceeded at 300 feet from a loading dock. However, the DEIR also recognizes that the shipping and receiving building would create a barrier between the loading dock and residences to the west, so that it would be "far less likely" that County standards would be violated at the residences to the west. The science of acoustics has established that barriers that provide a physical separation between a receptor and a noise source will reduce noise levels heard by the receptor by partially blocking sound wave transmission. The extent of the noise reduction depends on various factors such as the height and thickness of the barrier. For example, a wooden fence provides less noise reduction than a 1-foot thick masonry wall. A building would provide greater noise reduction than a masonry wall. The shipping/receiving building would be configured so that the width of the building would be located between the residences to the west and the shipping/receiving activities, which would occur on the eastern side of the building, as shown in both the DEIR and the revised site plan described in Section 2.1 of this FEIR. The revised conceptual plan would further reduce noise levels at local residences by shifting the shipping and receiving building an additional 25 feet to the east, and creating a drive through vehicle passage that would minimize the need for trucks to back up and trigger back up alarms/beepers. Nonetheless, the DEIR includes mitigation requiring that loading docks are located and designed so that noise levels do not exceed County standards, as demonstrated by a specialized noise study prior to approval of a discretionary entitlement (e.g., small lot tentative map or conditional use permit). Therefore, the applicant must demonstrate that the configuration of the shipping/receiving building and operational parameters would ensure that loading dock noise levels would meet County standards, or provide additional measures, such as increased shielding, to meet those standards.

One comment stated that the DEIR did not address noise from the market or employee housing. The market is proposed to be located in the southeast portion of the East Parcel. Noises associated with markets typically include mechanical equipment and loading docks, which are addressed in the DEIR (see above). People talking and opening and closing car doors would also produce some noise, although at typically lower volumes than equipment. The distance between the market and surrounding existing residences would be great enough (over 300 feet) to ensure that these noise levels do not exceed County standards. In addition, project buildings would provide barriers between the market and residences to the north and west. Similarly, the distance from the market (the closest project feature) to the Tavern Inn and Squaw Valley Academy (approximately 225 and 125 feet, respectively) would minimize noise exposure, and Squaw Valley Road traffic noise would mask noises from the market.

Employee housing noise would result primarily from residents walking to and from their living spaces, the parking lot, transit, the market and/or the recreational facility. There are several elements of the East Parcel plan that would minimize exposure to such noise at nearby residences. First, the East Parcel is separated from residential development to the west by a minimum of 75 feet under the D EIR conceptual plan and 100 feet or more under the updated plan. Distances between residences to the north, west and across Squaw

Valley Road would exceed 100 feet. Access to the various components is internal within the site, so that employees would walk through the interior of the site to reach their vehicles, the store or the fitness center. The shipping/receiving building would provide a substantial barrier between employee-generated noise and western residences. Under the updated plan, employee-housing units have been moved toward the interior of the site, rather than the northern edge, providing additional separation from residences located north of the East Parcel. In addition, the updated plan provides for an 8-foot masonry wall along the northern perimeter of the developed area, which depending on design and location could provide from 5 to 10 dB in noise reduction (levels that would be clearly noticeable). Distance would minimize and Squaw Valley Road would mask employee-generated noise heard at the Tavern Inn and Squaw Valley Academy. For these reasons, noise associated with the employee housing would not be significant.

Several comments recommended that a sound wall and/or landscaping should be required as mitigation to reduce noise impacts on the East Parcel. As discussed above, noise from stationary sources can be reduced through mitigation to meet County standards, so a noise wall may not be required as mitigation. However, the applicant now proposes to construct an 8-foot masonry wall along the north side of the East Parcel. This wall, in combination with the project buildings would provide a continuous barrier between residences to the north, east, and west and the activities within the East Parcel, including the shipping/receiving area, employee housing, the parking garage and the market.

Another suggestion was to limit operations to 8 a.m. to 5 p.m., Monday through Friday. As discussed above, compliance with County noise standards can be achieved through site design and mitigation, so further mitigation is not necessary. Furthermore, the DEIR does include mitigation measures to limit the disturbance from emergency generators by limiting testing to the hours of 7 a.m. to 10 p.m. Typically, such noise is most disruptive during the night and early morning when people are sleeping, and when there are few other noises (such as traffic) to mask the sound. Furthermore, emergency generators would be tested/operated only periodically.

VISUAL CONCERNS

Comments on the visual impacts of the East Parcel development included statements that the DEIR "ignored" residents as an impacted group, that the DEIR described the view of the East Parcel as "average," that the land uses south of the East Parcel (specifically the Tavern Inn and Squaw Valley Academy) were mischaracterized as commercial, and that 35-foot buildings along Squaw Valley Road would create a visual canyon. Comments were also made that the DEIR did not address light pollution from vehicle parking and night lighting of the parking structure and adjacent driveways, or address blocking of sunlight from the south during winter months.

Visual Quality

The DEIR evaluates the visual impacts of the East Parcel development from Squaw Valley Road, because the site is visible from the road, which is well traveled. The East Parcel is largely screened from view of other roads and residences in the vicinity by development, trees, and vegetation.

The designation of views of the East Parcel as "average" is based on a qualitative rating system used by the Federal Highways Administration using three distinct criteria—vividness, intactness, and unity---to determine which of seven impact levels a site falls into, ranging from very low to very high (see page 8-2 of the DEIR for more detail). As discussed on page 8-39 of the DEIR, views of the East Parcel from Squaw Valley Road are considered "average" for several reasons. First, the context has been modified by commercial and residential development. Second, the utility lines and poles that border the East Parcel intrude into foreground, mid-ground, and distant views. Finally, while there are trees present, they do not substantially screen the disturbed and previously graded character of the East Parcel. As further explained on page 8-39, the view from the road is not intact and lacks highly distinctive features that would contribute to a memorable view or scenic vista. This is true of the views from the buildings to the south of Squaw Valley Road as well.

The impact on the existing visual character and quality of the East Parcel is evaluated on pages 8-51 and 8-52 of the DEIR. As discussed on page 8-51, construction activities would substantially alter the existing visual character of the East Parcel, although temporarily. The visual effects of construction would be mitigated by screening (Mitigation Measure 8-1). After construction, the DEIR concludes that visual quality from Squaw Valley Road would be reduced because views to the north would be partially blocked. The DEIR recognizes that the visual character of the proposed project on the East Parcel would be similar in nature to development to the south, which includes the multilevel buildings aligning Squaw Valley Road (e.g., the two-story Tavern Inn, the three-story Squaw Valley Academy and the Fire Station and the SVPSD office building).

These structures are characterized as "commercial" in the DEIR, which, as pointed out in one comment, is not strictly correct. Therefore, the last paragraph on page 8-52 of the DEIR is revised as follows:

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

The above revision does not alter the visual analysis, which is based on the character of existing buildings aligning the south side of Squaw Valley Road rather than their occupants.

Views from the land uses to the south of the East Parcel, including the Tavern Inn residences, would be similar to those from Squaw Valley Road. Views from the Tavern Inn would be partially blocked by existing vegetation and the angle of view from the condominiums to the project site. Views from the windows of the Squaw Valley Academy, the Fire Station, and SVPSD offices would be similar to those of drivers, because there is little screening vegetation in front of those buildings.

The buildings on the East Parcel would be set back from the road by a minimum of 35 feet, and landscaping would provide some screening. Therefore, drivers, runners, cyclists, and pedestrians would not experience a canyon-like effect from Squaw Valley Road.

The DEIR does address residents as an impacted viewer group. Views from residential areas are considered in the analysis of the Village development. However, the views from residences surrounding the East Parcel are largely obscured by trees and vegetation and/or the angle of view into the East Parcel. For example, views from the residences to the north and west would be less altered than views from Squaw Valley Road, particularly under the proposed revisions to the East Parcel layout. The nearest buildings would be located a minimum of 100 feet from any residence, so existing trees and vegetation would provide substantial screening. All activities within the East Parcel would be oriented toward the interior of the site, and views from residences into the interior would be effectively blocked by the backside of the shipping and receiving building, the 8-foot wall along the northern edge of the East Parcel development area, and the employee housing building on the eastern side of the development (Building 36).

Light

The DEIR considers the effects of light generated by the East Parcel in Impact 8-5 on pages 8-57 through 8-61. As stated on page 8-59, the East Parcel would require night lighting for parking lots, walkways, and exterior building lighting. The DEIR recognizes that even though vegetation provides screening, headlights on the elevated parking structure and security lighting might be seen from upper story windows of nearby residents. Mitigation Measure 8-5a requires the installation of a mixture of evergreen and deciduous trees and shrubs in the open space areas to reduce the effects on night lighting on adjacent residences. In

addition, Mitigation Measures 8-5b and 8-5c require that parking structures must be designed to avoid direct illumination of existing residential buildings, lighting in parking lots must use cut-off fixtures, and building lighting must be shielded and directed downward. Car headlights would be blocked by the barricades/walls surrounding the upper levels of the parking structure.

Blocking Sunlight

A comment was made that the DEIR did not address the blocking of sunlight from the south during winter months by employee housing buildings. The DEIR focused the analysis of shadows cast by the proposed project on the Village, because of the height of buildings proposed for the Village and the existence of outdoor gathering spaces and nearby structures in those areas. There are no existing outdoor gathering areas or existing structures in close proximity to the East Parcel relative to the height of proposed the structures (no more than 35 feet tall) and the shadows they would cast. With a maximum height of 35 feet, buildings on the East Parcel would generally be of lower stature than in the Village, and any shadows cast would fall primarily onto the vegetated open space areas to the north, east, and west. Because the sun moves along the southern sky, no shadows would be cast to the south from East Parcel facilities. Moreover, due to the distance from structures on the East Parcel to the nearest residences, which would be in excess of 100 feet at the nearest location, new shadows would not be cast on offsite residences.

AIR QUALITY CONCERNS

Concerns were expressed that nearby residents would be subjected to odors and exhaust emissions from the East Parcel. As stated on page 10-24 of the DEIR, there would be minor odors associated with heavy-duty diesel equipment during construction and the laying of asphalt, but these odors would dissipate rapidly, and would occur primarily during the summer months. With respect to the East Parcel, heavy equipment, particularly snow removal equipment, is currently stored and used at the site without resulting in complaints about odor. After construction, there would be potential odors from diesel-fueled delivery trucks and snow removal equipment. These odors would also be dispersed over distance, and are therefore not expected to be intrusive at surrounding residences. Furthermore, the facilities on the East Parcel would be subject to PCAPCD Rule 205 regarding the control of nuisances, including odors. For these reasons, it is not anticipated that there would be odors emanating from the East Parcel that would be substantial enough to disturb nearby residents.

Similarly, the occurrence of diesel-fueled delivery trucks would not expose nearby residents to substantial levels of toxic air contaminants. As discussed on page 10-23 of the DEIR, trucks would not be allowed to leave their engines running for extended periods of time, and idling would be limited to 5 minutes per state regulations. The number of trucks accessing the site and the length of time their engines would be running would not generate sustained, high levels of toxic air contaminants at the site. The levels would be even lower at nearby residences due distance, the rapid dissipation of diesel emissions over distance, and the barriers provided by the wall and buildings.

Suggested Mitigation

Several comments suggested mitigation for impacts at the East Parcel, including:

- moving the store, employee housing and/or shipping and receiving to the Village or elsewhere;
- designing the site so that trucks do not need to back up frequently (and use beepers/backup alarms);
- construction of sound walls;
- limiting operations of the shipping and receiving facility to 8 a.m. - 5 p.m., Monday through Friday;
- restricting stopping or idling on Squaw Valley Road while waiting to enter the East Parcel;
- landscaping, including 35-foot high trees; and
- forbidding alcohol sales at the market.

As discussed above, several of these measures have been incorporated into the proposed revised site plan. The revised design of the site will allow delivery trucks to enter and exit with minimal backing up to loading docks, thereby reducing (or eliminating) the need for beepers/backup alarms. The access road is long

enough that trucks should not need to wait on Squaw Valley Road before entering the site. An 8-foot masonry wall has been added along the northern perimeter of the development area, which, in combination with the shipping and receiving building and eastern employee housing building, will provide a continuous barrier along the western, northern and eastern edges of the developed area. Loading docks must be located and designed to meet County standards for noise, which would preclude the need to limit the hours of operation. Landscaping will be installed along the Squaw Valley frontage, some of which will include taller elements.

Alcohol sales are not implicated in environmental effects, and therefore would not be considered as mitigation. However, issues related to alcohol sales are subject to state law and County ordinance, which are enforced by the sheriff's department.

Other Issues

Other concerns raised in comments addressed the potential for increased litter from the grocery store and crime and violence because of liquor sales to employee housing residents and transients. These are social issues that are not required to be addressed under CEQA, and that are covered by State law and County ordinances. The sheriff's department will be responsible for enforcing these laws.

3.1.14 Master Response: Mountain Maintenance Facility

The existing Red Dog complex currently houses equipment and maintenance functions for the Squaw Valley Resort; as well as several other departments, including ski patrol and dispatch, resort ski and snowboard teams, grooming, and lift mechanics. With implementation of the VSVSP, some of these operations would be relocated within the resort, based on compatibility with proposed uses or due to need for quick snow access. A mountain maintenance facility would be located on Lot 19 along the west side of the project boundary in the Village, within which other resort maintenance functions currently housed in the Red Dog complex (such as rubber-tire vehicle maintenance, equipment storage, and offices) would be relocated. The mountain maintenance facility is a component of the project, and was evaluated throughout the DEIR. As such, the conclusions in the DEIR reflect this proposed land use.

The location of the mountain maintenance facility is currently zoned for a mixture of Forest Recreation, Conservation Preserve, and Village Commercial use. Much of the site is currently paved, and the area is already used for limited equipment staging. An existing structure on the western end of the property would be retained.

POTENTIAL FOR LAND USE CONFLICTS

As shown on Exhibit 4-4 in Chapter 4, "Land Use and Forest Resources," of the DEIR, the zoning of the mountain maintenance facility would change from Village Commercial (1.32 acres), Forest Recreation (1.23 acres), and Conservation Preserve (0.30 acre) to Village-Heavy Commercial (2.85 acres). The intent of the proposed Village-Heavy Commercial land use is to establish an area for uses related to ski resort operations. This land use would provide space for heavy equipment maintenance, propane storage, offices and construction-related shop space, and parking. Land use to the northeast would change from Forest Recreation, Village Commercial, and High Density Residential to Village Commercial-Neighborhood, resulting in mixed use neighborhoods adjacent to the mountain maintenance facility. Land use associated with Squaw Creek to the south would remain open space (zoning would change from Forest Recreation and Conservation Preserve to Village-Conservation Preserve), and the open space to the northwest of the VSVSP area would be unchanged.

Within the mountain maintenance facility, discrete areas would be fenced, as required by code or OSHA regulations. All new buildings would be setback a minimum of 15 feet from the edge of the property and outside of the stream corridor and Village-Conservation Preserve zoning. In the adjacent neighborhood,

buildings would be setback at least 25 feet. As a result, all residences would be at least 40 feet from any heavy commercial use.

As characterized in Chapter 4, "Land Use and Forest Resources," of the DEIR, the proposed zoning change would increase the area zoned for heavy commercial use by 0.16 acre and relocate the land designated for heavy commercial use from the center of the project area, near the base of the ski slopes, to the periphery of the property. While the analysis DEIR acknowledges that the introduction of this new land use adjacent to a natural area has the potential to create conflicts related to, for example, visual resources and noise, it is anticipated that there would be an overall benefit to site aesthetics, noise, and safety by locating potentially noxious activities away from the most heavily populated portions of the project area. Further, because the existing commercial area is also nearly surrounded by lands designated for forest recreation, this potential for conflict exists in either location (see Exhibit 4-2a in the DEIR). The DEIR concludes that the proposed VSVSP would expand upon existing similar uses within the plan area and would not be expected to result in any substantial new long-term land use conflicts. In addition, a substantial portion of the site is already heavily disturbed and includes a 5,200-square-foot shop building, paved parking and circulation areas, and outdoor storage. Redevelopment of this site to include additional uses, such as a rubber tire maintenance shop and propane storage and distribution facilities to serve the plan area, would add new areas of disturbance but would continue a previously established land use pattern.

VISUAL CONCERNS

The industrial nature of the mountain maintenance facility would be masked by the proposed landscaping, fencing, and setbacks. Landscaped areas would be included on the north, west, and southern boundaries of the mountain maintenance facility, which would provide a visual buffer for individuals recreating along Squaw Creek or the open space to the west, and would link the property to the surrounding forested areas (see Figure 4.1 in the VSVSP). The mountain maintenance facility would be separated from the Shirley Canyon trailhead by the creek, and direct viewing of the area would likely be obscured by vegetation. With these project elements in place, the changes to the visual resources on Lot 19 would be as described in Chapter 8, "Visual Resources," in the DEIR for the remainder of the plan area. As described in the discussion of Impact 8-2, the character of the main Village area is defined by existing resort structures, including maintenance and infrastructure buildings (see page 8-50 of the DEIR). Views of the project site from the west currently include building and parking areas, and the proposed development would be consistent with the character of the existing resort development. Screening would be used to reduce the visual effects of construction (Mitigation Measure 8-1) and development would comply with the Development Standards and Design Guidelines established in the VSVSP (Mitigation Measure 8-2b).

AIR QUALITY CONCERNS

The potential for the proposed project to expose nearby receptors to emissions of toxic air contaminants (TACs) is assessed under Impact 10-4 in the DEIR, starting on page 10-22 in Chapter 10, "Air Quality." TACs are pollutants of local concern because they can present harmful effects when they are emitted in close proximity to sensitive receptors. For commercial and industrial land uses, the primary TAC of concern is particulate matter contained in the exhaust of diesel-powered engines (diesel PM). As described above, various types of equipment would be stored and maintained at the mountain maintenance facility and some of this equipment would be diesel powered. Diesel powered equipment are not left running when being stored and repair and maintenance of diesel powered equipment typically does not involve having the engine run for an extended period of time. As discussed under Impact 10-4, the dose to which receptors are exposed to TAC emissions is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards) and dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for any exposed receptor. Thus, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period of time. Therefore, due to the limited duration in which equipment would be operated at the mountain maintenance facility and the limited duration any receptor would be located nearby activities at the mountain

maintenance facility, the proposed land use is not expected to expose nearby receptors to substantial concentrations of diesel PM and associated health risk.

Other TAC sources that would be located at the mountain maintenance facility include propane storage tanks and fuel dispensing equipment (e.g., diesel pumps for refueling equipment). These types of sources would have to comply with PCAPCD rules including PCAPCD Rule 212, Storage of Organic Liquids: PCAPCD Rule 501, Permit Requirements; and PCAPCD Rule 513, Toxics New Source Review. These rules would ensure that sensitive receptors would not be exposed to substantial risk levels. Therefore, the levels of health risk exposure to visitors, residents, and workers on or near the project site would be less than significant.

NOISE-RELATED CONCERNS

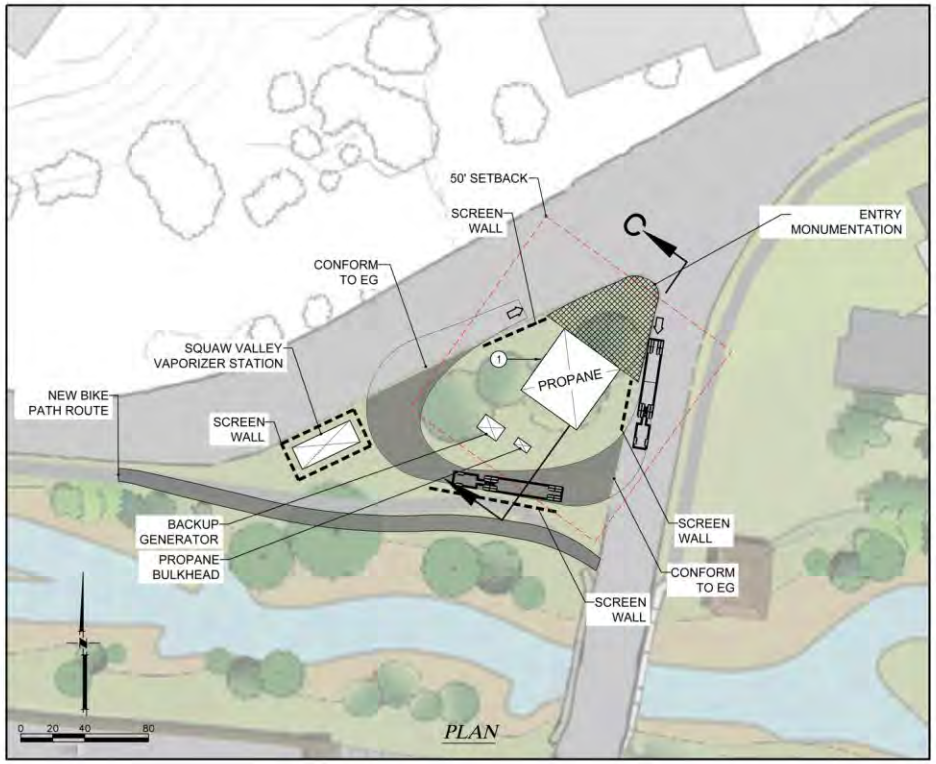
For information about the analysis of noise related to the mountain maintenance facility, see the Master Response regarding noise.

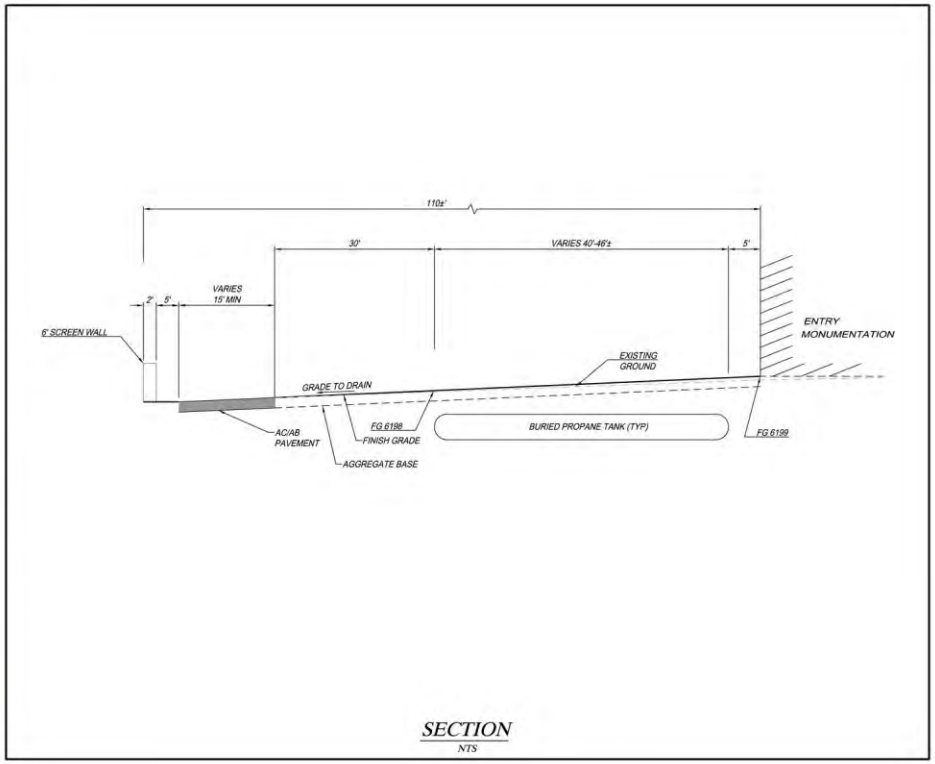
PROPANE STORAGE

As evaluated in the DEIR, all of the propane needed to serve development in the main Village area would be stored in five 30,000-gallon storage tanks at a “tank farm” in the mountain maintenance facility, and would be distributed through the plan area via underground pipelines. However, as described in Section 2.1, “Project Modifications,” of this FEIR, the applicant has revised the proposal for storage of propane such that two or three of the proposed tanks would potentially be located on an alternative site south of Squaw Valley Road on Lot 28 (see Exhibit 3-1). The tanks would be buried, and would meet all applicable local, State, and federal safety standards. Adherence to existing regulations is anticipated to reduce safety risks to an acceptable level on any of these sites. As discussed on page 15-8 in Chapter 15, “Hazardous Materials and Hazards,” of the DEIR, the propane distribution system would be regulated under Title 49 of the CFR adopted by the California Public Utilities Commission under General Order 112-E. The California Public Utilities Commission’s Utilities Safety Branch administers the propane safety program, scheduling each jurisdictional system for a safety audit at least once every 5 years to assure compliance with the federal pipeline safety regulations. The proposal to decentralize propane storage would avoid concentrating residual safety hazards in one area of the site.

ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS

The use of potentially hazardous materials at the mountain maintenance facility would be similar to current operational conditions and would be in compliance with federal, state, and local regulations promulgated to protect surface and groundwater quality. As described on page 15-15 of Chapter 15, “Hazardous Materials and Hazards,” of the DEIR, materials that would be stored, used, and transported to the project site would include paints, pesticides and herbicides, chemicals used for maintaining proper pool and hot tub water conditions, propane for heating, and diesel for emergency backup generators. The analysis of potential impacts associated with use of these materials determined that impacts related to the creation of significant hazards to the environment through the routine transport, use, and disposal of hazardous materials would be unlikely because the proposed project would be required to implement and comply with existing regulations (see Impact 15-1: Use of hazardous materials). Therefore, the potential for storage of hazardous materials at the mountain maintenance facility to result in effects on the environment, including contamination of Squaw Creek and the aquifer, have been evaluated in the DEIR and determined to be less than significant.





SPECIFIC PROPANE NOTES:

1. INSTALL 3 NEW 30,000 GAL UNDERGROUND PROPANE STORAGE TANKS.
2. ADDITIONAL COUNTY, STATE AND FEDERAL REGULATIONS MAY BE APPLICABLE.

LEGEND:

EG EXISTING GROUND
CL CENTERLINE
TW TOP OF WALL
FG FINISH GRADE

Source: MacKay & Somps 2015

X11010091 04 006

Exhibit 3-1

Lot 28 Propane Site (Conceptual Plan)

INTERFERENCE WITH AQUIFER RECHARGE

The DEIR includes an analysis of the potential effects of project development on groundwater recharge in the discussion of Impact 13-4 beginning on page 13-52 of the DEIR. The entire main Village area, including the mountain maintenance facility, is considered in the analysis, as indicated in Exhibit 13-16 on page 13-54 of the DEIR. For the reasons described in the DEIR, the effects on groundwater recharge and the aquifer from the proposed development of impervious surfaces are considered less than significant.

3.1.15 Master Response: TRPA Thresholds

Several comments addressed effects of the project on the Lake Tahoe Basin (Basin), which is under the jurisdiction of the Tahoe Regional Planning Agency (TRPA), specifying that the DEIR analysis failed to fully evaluate impacts within the Basin, and did not analyze the ability of TRPA to meet the adopted TRPA threshold standards if the project is adopted, including but not limited to LOS and VMT increases in Basin highways and arterial roadways, air quality, recreation, and cumulative impacts of additional projects in or near the Basin.

The DEIR, prepared pursuant to CEQA and the Placer County Environmental Review Ordinance, addresses the environmental impacts of the project, including those to transportation and circulation (see Chapter 9), air quality (see Chapter 10), recreation (see Chapter 14, “Public Services and Utilities”), and cumulative effects (see Section 18.1).

The DEIR addresses the reasonably foreseeable and potentially significant adverse effects of the project (direct and indirect), in appropriate local and regional contexts, and acknowledges that some environmental impacts, such as air quality and traffic, extend outside the immediate project area to include the Basin. Those impacts are identified and disclosed in the DEIR under their respective headings. For example, the LOS discussion is included in Section 9.3.4 of the DEIR, and describes impacts in the Basin to the intersection of State Route (SR) 89 and SR 28, and impacts to roadway segments, including SR 89 south of Tahoe City and SR 28 east of Tahoe City. Similarly, air quality impacts, analyzed in Chapter 10 of the DEIR, include those that could occur in the Mountain Counties Air Basin, Lake Tahoe Air Basin, in other counties, and into Nevada. Impacts of VMT also extend into the Basin; VMT is further addressed above in the Master Response regarding traffic. It was not necessary to analyze all intersections and roadways within the Tahoe Basin because project traffic levels would diminish as distance from the project site increases. The selection of study facilities considered this factor as well as TRPA thresholds of significance.

TRPA has jurisdiction over all development within the Basin in both California and Nevada, and has established a structure of environmental analysis and documentation that applies to development proposals within its jurisdiction to assure consistency in both states. Central to its regulation is a suite of Environmental Threshold Carrying Capacities (ETCCs, or threshold standards) that apply to projects that are proposed inside the Basin. TRPA was required to develop the ETCCs by the Tahoe Regional Planning Compact, and they include nine categories of environmental impact standards. Through its land use planning and project review authority, TRPA is required to achieve and maintain the ETCCs through its consideration and approval of projects within the Basin. The proposed project is outside of the defined Basin. TRPA does not have jurisdiction over projects outside of the Basin; thus, lead agencies such as Placer County are not required to apply TRPA’s threshold standards as part of their consideration of a proposed project located outside the Basin, or evaluate the ability of TRPA to meet the thresholds.

For projects proposed in California and located within the Basin, environmental documentation must comply with both TRPA requirements, with TRPA as a lead agency, and with CEQA, with a state or local public agency as lead agency, because of overlapping jurisdictions. However, outside the Lake Tahoe Basin in California, development proposals, such as the proposed project, are subject to environmental review under CEQA but are outside the jurisdiction of TRPA. Cumulative impacts, and project-specific impacts that extend outside the project area, to the extent such impacts are reasonably foreseeable, are examined where they may occur

based on the requirements of CEQA. The determination of what thresholds of significance to apply and whether an impact of a project is significant remains within the independent review and discretion of the lead agency under CEQA. "The determination of whether a project may have a significant effect on the environment calls for careful judgement on the part of the public agency involved" (CEQA Guidelines Section 15064).

In the case of the proposed project, Placer County is the lead agency. While some impacts may occur in the Basin, TRPA has no permit authority over any element of the project and is not a responsible agency. During scoping, TRPA did not request that Placer County address TRPA thresholds in the DEIR. The County as lead agency has identified the appropriate thresholds of significance for each impact, including those impacts which could occur from the project within the Basin.

Even if the thresholds were applicable, most of the issue areas addressed by the TRPA ETCC would be unaffected by the proposed project. The project, for example, would not alter the amount of impervious surface or grading within the Basin and would not result in stormwater runoff that would drain into the Basin due to the distance and geography separating the project area from the Basin as defined. Therefore, most of the impact areas addressed by the TRPA thresholds, including water quality, soil conservation, vegetation preservation, wildlife, and fisheries would be unaffected by the proposed project. The project site is also not visible from the Basin, so scenic resources would not be affected. The ninth ETCC, Recreation, is not an environmental standard, but a policy statement that recognizes the need to maintain and enhance recreation opportunities as one of the major drivers of the regional economy that contributes to the quality of life in the Basin. While Recreation is the core business of Squaw Valley Resort, it is not considered as contributing to achieving TRPA's Recreation ETCC, because it is outside TRPA's jurisdiction.

The air quality thresholds are based on the air basin that would be affected by project development and traffic, the Mountain County Air Basin, which includes the Tahoe Basin.

With regard to VMT, the exact VMT from the project and its contribution to the Basin was not directly evaluated, except as it pertains to traffic effects on roadways. This issue is discussed further in the portion of the traffic Master Response that addresses VMT.

3.1.16 Master Response: Squaw Valley General Plan and Land Use Ordinance

Numerous comments state that the project's use of the SVGPLUO is inappropriate because it has not been comprehensively updated since it was adopted by Placer County in 1983. Instead, comments suggest that the County update the SVGPLUO to better reflect current conditions and community desires in Olympic Valley before project approval. This issue is discussed below.

BACKGROUND

The SVGPLUO is a legal and valid plan, and is the only extant specific plan level document available for evaluating the proposed project.

The relationship of the proposed project to the SVGPLUO is described on page 1-1 of the DEIR as follows,

> The proposed Specific Plan is the first specific plan proposed under the *Squaw Valley General Plan and Land Use Ordinance* (SVGPLUO), which was adopted by Placer County in 1983. The Specific Plan would, if approved, amend the SVGPLUO to redesignate the project site as "Specific Plan" and comprehensively plan development of a recreation-based, all-season, mountain resort community. The proposed Specific Plan is designed to be consistent with the overall development intensity and the goals, objectives, and policies in the SVGPLUO, the Specific Plan is proposed to provide for a more coordinated and well integrated development, including rezoning some areas to more appropriately reflect site conditions and the proposed development mix.

Reliance upon the goals, policies, and land uses established in the SVGPLUO together with the goals and policies of the *Countywide General Plan* for evaluating the Village at Squaw Valley Specific Plan project is correct and is compliant with the requirements of State Planning Law.

The SVGPLUO is the adopted community plan and land use ordinance for the unincorporated community of Olympic Valley, also known as Squaw Valley. It was last comprehensively updated in 1983. It is one of the County's community plans adopted for the purpose of systematic implementation of the goals, policies and land use designations of the Placer County General Plan, also referred to as the *Countywide General Plan*. Both documents used together function as the County's "blueprint" for growth within Olympic Valley. The SVGPLUO incorporates all of the goals and policies of the General Plan, and also includes additional goals and policies that build upon and supplement, but do not supersede, the goals and policies of the General Plan. (See 2013 General Plan, p. 2; see also Placer County Zoning Ordinance, Chapter 17, Appendix A; Sections 17.02.030, 17.02.50, subd. (D)(2) (providing "[w]hen conflicts occur between the provisions of this chapter and standards adopted by ordinance in any applicable community plans…the provisions of the community plans shall apply").) The SVGPLUO, including as may be amended in conjunction with approval of the proposed project, is, and will remain, internally consistent with the *Countywide General Plan*.

State planning law requires that each city and county must adopt a comprehensive, long-term general plan and that the general plan must include certain specified elements to detail plans for provision of public services and the protection of resources. In addition, certain required elements of a general plan, such as a Housing Element, must be updated at specified intervals. The State Office of Planning and Research further suggests that comprehensive update of a general plan should be undertaken approximately every 15 to 20 years, or as necessary to respond to significant changes to land use patterns, infrastructure needs, or other changes to community needs. An adopted community plan is not required to be updated, though it may be updated at the discretion of the legislative body.

APPROVAL OF GENERAL PLAN AMENDMENTS, PROJECT AREA REZONING, AND DEVELOPMENT STANDARDS

The proposed Specific Plan would be adopted by approval of an amendment to the Placer County General Plan, also referred to as the *Countywide General Plan*, and amendment of the SVGPLUO, a community plan which systematically implements the *Countywide General Plan*. In order to be adopted, the project must be found to be consistent with both the *Countywide General Plan* and the Squaw Valley General Plan. Upon adoption of the Specific Plan, the Land Use Maps of the *Countywide General Plan* and the Squaw Valley General Plan would be amended to show the newly established Specific Plan area.

The project area would be rezoned to include the Specific Plan (SPL) zoning designation, which applies to all specific plan projects and would result in the newly created SPL-VSVSP zoning classification (see page 4-25 of the DEIR). Approval of an amendment to the Placer County Zoning Ordinance, in the form of a new ordinance, would create the SPL-VSVSP zoning designation and adopt the Village at Squaw Valley Specific Plan Development Standards and Design Guidelines as an appendix to the Placer County Zoning Ordinance and the SVGPLUO.

POLICY AMENDMENTS TO ENSURE CONSISTENCY WITH THE PLACER COUNTY GENERAL PLAN AND THE SQUAW VALLEY GENERAL PLAN

When the Specific Plan is implemented, one County roadway intersection (Squaw Valley Road/Village East Road) within the Specific Plan area would operate at an unacceptable level of service (LOS F), even with mitigation, for brief periods on a limited number of days each year during peak traffic conditions. As stated on page 4-23 of the DEIR, "in accordance with *Placer County General Plan* Policy 3.A.7, the VSVSP proposes to establish roadway LOS Policy CP-1 for roadways located within the plan area to allow LOS F to be acceptable on County roadways within the plan area during peak periods. Proposed VSVSP Policy CP-1 is as follows (and is also repeated in Section 9.3.2, "Methods and Assumptions," in Chapter 9, "Transportation and Circulation," in the DEIR):

- **Policy CP-1:** Design and construct roadways and associated facilities that generally meet applicable County standards and roadway levels of service. During peak periods, LOS F is acceptable within the Plan Area for the following reasons:
  - Resort areas have atypical traffic conditions, with moderate traffic levels during most of the year, and more congestion during high peak periods;
  - Peak periods at Squaw Valley occur for limited periods of time and during a relatively small number of days per year;
  - The primary improvement that would result in acceptable LOS during peak periods is the widening of Squaw Valley Road to four lanes, which is not feasible for economic and environmental reasons;
  - Other measures are available to manage the peak traffic flows, such as three-lane operation with cones, signage, and traffic personnel; and
  - Improvements necessary to achieve the adopted LOS would create capacity that was unneeded during the majority of the year."

Placer County General Plan Policy 3.A.7 allows for establishment of alternative roadway Level of Service standards within a community plan or specific plan. If the VSVSP is approved, Policy CP-1 would be adopted and the Specific Plan would be consistent with *Placer County General Plan* Policy 3.A.7. While mitigation measures are incorporated into the project, no feasible mitigation measures exist that would improve peak period traffic at the identified intersections to LOS C, and therefore this impact is significant and unavoidable. See also the portion of the traffic Master Response regarding Specific Plan Policy CP-1.

Implementation of the project would result in amendment to the Squaw Valley General Plan Potential Avalanche Hazards Area (PAHA) mapping for the project area as described on page 3-39 of the DEIR, "Project Description," and further detailed on pages 4-24 and 4-25, "Land Use and Forest Resources," in the DEIR. The physical changes to the PAHA boundaries are shown in Exhibit 12-9 of the DEIR and described in Impact 12-3 (Exposure of structures and persons to effects of snow avalanche). The DEIR found that, due to improvements in snow management resulting from the implementation of an ongoing active avalanche control program at Squaw Valley Resort and partial reforestation of avalanche runout paths, high-hazard and low-hazard PAHA boundaries on the mountain are reduced in the area, as shown in Exhibit 12-9. While the DEIR determined that potentially significant impacts could occur if habitable structures are constructed in low-hazard PAHA's, implementation of Mitigation Measure 12-3 (Confirm implementation of avalanche hazard mitigation actions) would reduce this impact to less-than-significant. No other amendments to the Squaw Valley General Plan are necessary to implement the project.

PLANNED UNIT DEVELOPMENT

Several commenters stated that the project should be required to be resubmitted as a Planned Unit Development (PUD), a type of residential subdivision that allows for clustering residential lots. In a PUD, lots are typically smaller than otherwise allowed by the base zoning, and the permitted density may be allowed to exceed the base zoning in exchange for designation of additional open space and resource protection.

The approximately 85-acre main Village area, under existing conditions, is primarily zoned Village Commercial (53.17 acres) with lesser amounts of High-Density Residential (9.48 acres) and Heavy Commercial (2.69 acres) land uses. Also included are 8.05 acres of Conservation Preserve and 11.12 acres of Forest Recreation zoning. The 53.17-acre Village Commercial zoning district permits development of retail, commercial, guest lodging, hotels, resort residential, resort recreation, day-skier parking, and guest parking uses. The 9.48-acre area of High-Density Residential zoning permits a variety of single-family, multi-family, condominium, timeshare, and vacation home land uses. Active and passive recreation, open space,

and conservation land uses are permitted on the 19.17-acres that comprise the Forest Recreation and Conservation Preserve zoning.

The Specific Plan, if approved, would rezone the 85-acre main Village area to include the same or comparable land uses, though the land uses would be in a somewhat modified configuration and with the addition of the "Village" land use designation. The main Village would develop less than 50 percent of the units and bedrooms that could be permitted under the existing base zoning; a substantial reduction in the allowable density of existing land uses in the SVGPLUO. Therefore, there is no need to provide for additional units, as would typically be allowed by a PUD. An existing 11.12 acres of Forest Recreation zoning would be increased to 15.4 acres of Village-Forest Recreation, and an existing 8.05 acres of Conservation Preserve zoning would be increased to 17.78 acres of Village-Conservation Preserve for a net total increase of 14.01 acres of lands dedicated to open space and conservation land uses.

These land use modifications, while achieved through adoption of the Specific Plan and not approval of a PUD, achieve complimentary goals to increase open space land uses and protect natural resources. Furthermore, under existing conditions, the main Village area is predominantly zoned Village Commercial. While PUDs are an allowed use in the Village Commercial zone district, the intent is for the area to predominantly consist of hotels, guest-lodging, retail, and resort-recreation land uses in a pedestrian village setting, much as the Specific Plan proposes, and not to include single-family residential land uses (SVGPLLUO, Section 220 – Village Commercial District).

Similarly, under existing conditions, the 8.82-acre East Parcel is primarily zoned Entrance Commercial (6.54 acres) and High-Density Residential (1.81 acres) with a small portion of Conservation Preserve (0.47 acre) located along Squaw Creek. The Entrance Commercial zoning district permits development of a variety of service oriented retail and commercial land uses; both the Entrance Commercial and the High-Density Residential zoning permit single-family, multi-family, condominium, and timeshare residential land uses (SVGPLUO, Section 224 – Entrance Commercial District, and Section 246 High-Density Residential).

The Specific Plan would rezone the East Parcel to include 5.7 acres of Entrance Commercial zoning and 2.34 acres of Village-Conservation Preserve zoning, a reduction of 2.65 acres of developable land uses when compared to the current zoning. No High-Density Residential zoning would remain. Proposed land uses and development densities would be similar to what is permitted under the existing zoning (see also the Maser Response regarding the East Parcel).

As detailed above and in Chapter 4, "Land Use and Forest Resources," of the DEIR, the project is predominantly consistent with the Placer County General Plan and the Squaw Valley General Plan, and only minor policy amendments are necessary for Specific Plan approval. Approval of an Ordinance to adopt the Village at Squaw Valley Specific Plan Development Standards and Design Guidelines would incorporate the project development standards into the County Code, which would comply with the requirements of the Placer County Zoning Ordinance.

3.1.17 Master Response: Greenhouse Gas Analysis

INTRODUCTION

Summary of DEIR Conclusions

A number of comments addressed the DEIR's analysis of GHGs (which contribute to climate change impacts).

The Placer County Air Pollution Control District (PCAPCD) is the agency with jurisdiction over air quality and other air emissions-related issues in Placer County. Because the project site is within the jurisdiction of the PCAPCD, the DEIR generally used the thresholds of this agency. As explained on page 16-9 of the DEIR, several air districts in the region, led by the Sacramento Metropolitan Air Quality Management District

(SMAQMD), adopted a two-tier approach described below (Sacramento Region Air Districts 2013). The PCAPCD was one of the air districts that collaborated with SMAQMD and adopted these thresholds.

Page 16-9 of the DEIR presents the description of the PCAPCD's two-tier approach for determining if GHG emissions are significant. First, the mass emissions of the project are estimated; if the predicted emissions exceed a specified level (i.e., Tier I threshold, 1,100 metric tons of CO_2-equivalent emissions per year, or 1,100 $MTCO_2e$/year), then the project must be evaluated to determine if it is GHG "efficient." PCAPCD's measurement of whether a project is GHG efficient, as explained in the DEIR, is whether the project would generate 21.7 percent less GHG emissions in 2020 than would occur under a "no action taken" scenario, otherwise commonly known as "business as usual" (BAU). The 21.7 percent efficiency target is the PCAPCD's Tier II threshold and was derived originally from an update the 2008 Scoping Plan, as noted below.

BAU is a concept that originated in the California Air Resources Board (ARB) 2008 Scoping Plan, which is described on pages 16-4 and 16-5 of the DEIR. The Scoping Plan determined the expected emissions trajectory in California from 2008 to 2020, absent further regulation and other recommended actions. The trajectory was called BAU, which assumes emissions would be generated in the future along a growth curve similar to the past, and considering population and economic growth. The 2008 Scoping Plan defined the statewide level of reduction in GHG emissions needed to attain the emissions targets expressed in AB 32, which states that GHG emissions in California should be reduced to 1990 emissions levels by the year 2020.

A number of regulatory programs and recommendations grew out of the Scoping Plan (e.g., Cap-and-Trade Regulation, Advanced Clean Car Program, and Renewable Electricity Standard). At the time the 2008 Scoping Plan was adopted, California needed to reduce GHG emissions by 29 percent below the BAU trajectory to attain the AB 32 target of 1990 emission levels by 2020. The Scoping Plan was updated and adjusted in 2011 because the 2008 Recession slowed economic growth and the related growth in emission rates. Based on this 2011 adjustment, ARB projected that GHGs needed to be reduced by 21.7 percent below BAU to meet the AB 32 goal by 2020 (ARB 2011).

The year 2020 is used as the benchmark for GHG reductions because AB 32 only establishes a statutory reduction target for that year. While AB 32 provides for the continuation of the 2020 reduction target beyond that year, it is anticipated that the next Scoping Plan update will specify post-2020 GHG reduction targets. The next five year update to the Scoping Plan is due by 2018. Further, executive orders already express the Governor's policies for post-2020 reduction targets, although a statutory GHG reduction target beyond 2020 has not been established by the Legislature. The need for deeper, long-term reductions is supported by scientific, substantial evidence regarding the level of emissions associated with avoidance of the most serious climate change-related impacts. These factors and circumstances are explained in the DEIR at pages 16-5, 16-17, and 16-18. Executive Order (EO) S-3-05 established a target for GHG emission reduction of 80 percent below 1990 levels by 2050 (see page 16-4 of the DEIR). Also, EO B-30-15, issued around the time the DEIR was being released, established an interim (i.e., between 2020 and 2050) GHG reduction target of 40 percent below 1990 levels by 2030.

Impact 16-2 of the DEIR concluded that GHG emissions would exceed the PCAPCD-recommended mass emissions thresholds of 1,100 $MTCO_2e$/year. The DEIR concluded that, if the entire project was completed by 2020, it would generate 46,994 $MTCO_2e$/year. The DEIR also concluded that the project would be 25.3 percent more efficient than BAU, using 2020 as a target year. However, the DEIR went on to discuss that the project would, in reality, be completed well after 2020; that lower post-2020 GHG reduction targets would likely be established in the next Scoping Plan update (2018) (similar to those included in executive orders) to avoid dangerous levels of climate change (see discussion above); and that uncertainty surrounded what specific new reduction targets would be established by the California Legislature or by regulation, as well as the degree to which future regulations may result in reductions in GHG emissions associated with the project.

Recognizing the project's predicted emissions and pending status of post-2020 GHG reduction targets, the DEIR concluded that the project's GHG emissions would be potentially significant. The conclusion for Impact 16-2, on page 16-8 of the DEIR, is:

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

Newhall Ranch Supreme Court Case Summary

The DEIR was released in May 2015 and the comment period closed in July 2015. On November 30, 2015 the California Supreme Court issued an opinion regarding the validity of how GHG impacts were evaluated in an EIR, among other issues. The decision, *Center for Biological Diversity v. California Department of Fish and Wildlife (*2015) 224 Cal.App.4th 1105 (*CBD v. CDFW*), concerned a large land use development proposal, commonly known as "Newhall Ranch," located in Southern California. The discussion below is based entirely on the written opinion. An "order modifying and denying petition for rehearing" was filed by the Supreme Court on February 17, 2016, but it did not alter any of the conclusions of the case as it relates to the discussion below.

The Newhall Ranch EIR was certified in 2010 and evaluated a large land use project in Southern California. The EIR concluded that the project would generate approximately 270,000 $MTCO_2e$/year of GHG emissions. The EIR discussed the Scoping Plan and the BAU scenario, which suggested (at the time the EIR was prepared in 2008 – 2010) that GHG emissions would need to be reduced 29 percent below BAU to meet the statewide reduction goal for 2020, mandated by AB 32. (See prior discussion regarding changes to the BAU trajectory, resulting from a 2011 Scoping Plan update.) The impact analysis in the Newhall Ranch EIR concluded that the project would emit 31 percent less GHG emissions than BAU and, therefore, the project would result in a less-than-significant GHG impact, because it was consistent with the Scoping Plan's indication that a 29 percent reduction was needed to reach the 2020 goal. The Supreme Court addressed the adequacy of the analysis and concluded, as relevant to this project, that:

- Given that GHG emissions are global in nature and that "any one project's contribution is unlikely to be significant by itself," these emissions are properly evaluated considering whether their contribution is cumulatively considerable;
- GHG emissions, "once released in the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are also global in nature…from a climate change point of view it does not matter where in the state those emissions are produced";
- "Given the reality of growth…evaluating the significance of…a project's greenhouse gas emissions by their effect on the state's efforts to meet its longterm goals make as least as much sense as measuring them against a numeric goal."
- "Using consistency with AB 32's statewide goals for greenhouse gas reduction, rather than a numerical threshold, as a significance criterion is also consistent with the broad guidance provided by section 15064.4 of the CEQA Guidelines." And, "…distinctive aspects of the greenhouse gas problem make consistency with statewide reduction goals a permissible significance criterion for such emissions. Using a hypothetical scenario as a method of evaluating the proposed project's efficiency and conservation measures does not violate" CEQA.

- However, the Court also found that, in the instance of the Newhall Ranch EIR, nowhere does the Scoping Plan (upon which the BAU reductions were based) relate statewide reduction targets to the reduction needed from an individual project, and that the EIR lacked substantial evidence to link achievement of the Scoping Plan reduction below BAU to the adequacy of the project's rate of emission reduction. The Court went on to cite the plaintiff's' argument that *additional reductions*, greater than suggested by a BAU approach, "…may be needed from new land use projects than from the economy as a whole: Designing new buildings and infrastructure for maximum energy efficiency and renewable energy use is likely to be easier, and is more likely to occur, than achieving the same savings by retrofitting older structures and systems."

- The Court was also clear, later in its opinion, that it was not directing that additional reductions beyond the BAU are required, rather, only that the EIR in that case did not substantiate its assumption that the Scoping Plan's statewide GHG reductions requirement can be used as criterion for an individual project. The Court also found fault with the EIR's use of BAU as the sole criterion of significance. The Court reasoned that "In the absence of substantial evidence to support the EIR's no-significance finding, as noted above, the EIR's readers have no way of knowing whether the project's likely greenhouse gas emissions impacts will indeed be significant and, if so, what mitigation measures will be required to reduce them. This is not the sort of '[i]nsubstantial or merely technical omission[]' that can be overlooked in deciding whether to grant relief." (*Id*., at p. 264.)

The Court also offered "potential options" or "pathways to compliance" for lead agencies faced with evaluating GHG impacts:

- Use the BAU approach, but link the level of reduction needed for a project using substantial evidence, including data in the Scoping Plan, to substantiate what a "new land use development at the proposed location must contribute in order to comply with statewide goals."

- Determine consistency with AB 32 goals by examining the degree to which a project meets regulatory programs and performance standards adopted for the purpose of complying with a statewide plan for reduction of GHGs, so long as the programs and standards apply to the elements of the project that generate GHGs. Common mechanisms for compliance would be the preparation of "geographically specific," GHG reduction plans, such as "climate action plans" and sustainable community strategies and determination that a project is consistent with such a plan.

- Finally, the Court suggested an approach to rely on a numeric threshold, and here the Court cited as an example, the Bay Area Air Quality Management District's threshold of 1,100 $MTCO_2e$/year.

The Court also noted that, with the passage of time, "… consistency with year 2020 goals will become a less definitive guide, especially for long-term projects that will not begin operations for several years. An EIR taking a goal-consistency approach to CEQA significance may in the near future need to consider the project's effects on meeting longer-term emissions reduction targets."

The BAU-comparison approach has been employed by other air districts and jurisdictions in California, including the PCAPCD and SMAQMD, with whom PCAPCD collaborated in developing its GHG thresholds. This EIR, however, did not use the BAU approach as the sole criterion of significance. The FEIR, as explained herein, also includes additional substantial evidence regarding the effectiveness of various statewide regulations and programs aimed at reducing GHG emissions, as well as additional information about how the project itself can further reduce GHG emissions.

Applicability of Supreme Court Decision to the VSVSP DEIR

PCAPCD GHG Threshold

As a result of the Supreme Court decision, SMAQMD issued the following statement (Greene, pers. comm., 2016):

The Court opinion did not impact the SMAQMD's recommended GHG thresholds of significance, but the opinion did cast doubt on the SMAQMD's recommendation to compare a proposed project's emissions to BAU emissions, and demonstrate consistency with the Climate Change Scoping Plan by reducing BAU emissions by 21.7 percent.

Both the plaintiff and the real party in interest in the action have filed for reconsideration. The Court has indicated it will rule on the requests in February 2016. Unless and until a revised ruling is issued, the SMAQMD does not recommend relying on the BAU 21.7 percent mitigation approach.

As noted above, the Supreme Court denied reconsideration on February 17, 2016; the provisions of the *CBD v. CDFW* decision relevant to the VSVSP EIR were not changed.

SMAQMD still recommends using the 1,100 $MTCO_{2e}$/year threshold. The PCAPCD has not issued any guidance on this topic, but given the fact that they collaborated with SMAQMD to develop GHG thresholds, it is reasonable to expect that the statement from SMAQMD is also relevant to PCAPCD. Irrespective of this, the *CBD v. CDFW* decision makes it clear that a BAU type of analysis must link with substantial evidence a project's GHG reductions, at the project's location, to the Scoping Plan's data and analysis to demonstrate consistency with the statewide goals. The SMAQMD resolution adopting its thresholds states, with respect to BAU, that "the level of mitigation for significant projects is based on demonstrating consistency with AB 32 and the California Air Resources Board's Climate Change Scoping Plan goal to reduce greenhouse gas emissions, which is currently a 21.7 percent reduction of emissions." (SMAQMD Resolution 2014-028) This language does not provide evidence to link the Scoping Plan to the VSVSP, and based on the *CBD v. CDFW* decision, does not substantiate whether a significant impact would result with respect to the project.

EIR Conclusions

The DEIR's significance conclusions remain unchanged, including the way it used the PCAPCD Tier II threshold of 21.7 percent below BAU. The rationale for this outcome is:

1. The long-term impacts of the project, as stated in the DEIR, are based on whether it would exceed the Tier I threshold of 1,100 $MTCO2_e$/year. As stated by the Supreme Court, a lead agency may rely on existing numerical thresholds of significance, and this threshold meets this criteria. The DEIR concluded that the project (without mitigation) would generate 45,403 $MTCO_2e$/year of GHG emissions at buildout in 2037. Because of this level of emissions, the impact would be significant (see DEIR page 16-18) and unavoidable (see page 16-19). This conclusion is consistent with Supreme Court guidance.

2. The Tier II threshold of 21.7 percent below BAU was used only to determine if the project would "conflict with ARB's Scoping Plan for 2020 targets" (DEIR page 16-16). The DEIR included an analysis that conservatively assumed that the entire project would build out by 2020, even though it is not projected to be completed for 25 years. This analysis was provided solely to compare the project, *if it were built by 2020*, to BAU, and found that the project would be 25.3 percent more efficient than the BAU target, without further mitigation. The *CBD v. CDFW* decision calls into question whether this type of BAU analysis can be used to determine significance based on whether the project is consistent with the Scoping Plan. For reasons explained in this discussion, and because the project's impacts related to GHGs were found to be significant (and unavoidable) for other reasons, the conclusion regarding conflicts with the Scoping Plan is immaterial to the overall significance conclusion for GHG emissions. Even if a conclusion cannot be drawn with respect to conflicts with the Scoping Plan, this would not alter the conclusion that GHG emission impacts would be significant and unavoidable.

3. Very little of the project, if approved, would be constructed prior to 2020. The analysis considered a buildout by 2020 for illustrative purposes to evaluate how the project matched with the Scoping Plan 2020 targets. However, it is 2016 as of this writing. Project consideration would likely be sometime later in 2016. If approved, it would likely be too late in the year to begin construction mobilization in 2016, given the seasonality of construction in the Sierra Nevada. According to the applicant, each

construction phase is a minimum of two years. Thus, the earliest any phase is likely to be completed would be 2018, assuming two seasons of construction in 2017 and 2018 for the first phase. The DEIR acknowledged this fact by including a detailed discussion of post-2020 GHG considerations (pages 16-17 and 16-18).

Consequently, while the *CBD v. CDFW* case addresses methods for consideration of GHG impacts, and one of those methods was used to illustrate GHG efficiency of the project in this DEIR, the DEIR ultimately relied upon the PCAPCD numeric threshold of 1,100 $MTCO_2e$/year as the basis for significance conclusions, and this threshold approach was expressly noted by the Supreme Court as permissible in *CBD v. CDFW*.

Other Considerations in Determining Significance

In evaluating the Supreme Court's decision, the EIR preparers explored other possible approaches described by the Court or otherwise consistent with CEQA. These approaches are discussed in this section.

Use of BAU Approach

The Court stated that the BAU approach is permissible in concept, but would need to be based on a substantial evidence-supported link between data in the Scoping Plan and the project, at its proposed location, to demonstrate consistency of a project's reductions with statewide goals. The Scoping Plan is a general, overarching document that describes the statewide approach California needs to take to achieve emissions reduction goals consistent with AB 32; that is, reducing GHG emissions to 1990 levels by 2020. The Scoping Plan addresses actions in various sectors of the economy, such as energy, transportation, agriculture, water, waste management, natural/working lands (forestry), and buildings. It is not directed at reducing GHG emissions for specific land uses in specific locations. Therefore, it is unclear how, within the structure of the Scoping Plan sectors, to develop the evidence to reliably relate a specific land use development project's reductions to the Scoping Plan's statewide goal, as envisioned by the Court.

Determine Consistency with AB 32 Goals

The Court suggested a project could examine the degree to which it meets regulatory programs and performance standards adopted for the purpose of complying with a statewide plan for reduction of GHGs, so long as the programs and standards apply to the elements of the project that generate GHGs. Common mechanisms for compliance are the preparation of and tiering from community-wide GHG reduction plans, such as "climate action plans" and sustainable community strategies (SCS).

The VSVSP is not within an area covered by a climate action plan or, as stated above, an SCS. Even though outside an SCS, as a resort project, it is consistent with many of the principles used for infill development, a hallmark of SCSs and GHG reduction programs: As described in Chapter 3, "Project Description," of the DEIR, it is adjacent to existing development (infill); would be largely built on an existing paved site (not a greenfield); and is designed to maximize walkability, minimize internal trips, and utilize transit (VMT reduction strategies), etc. Moreover, as explained in the DEIR, many of the trips anticipated to occur with the proposed project originate in areas which are subject to a SCS or CAP (e.g., Sacramento, Bay Area), as they do now. Some of these trips would occur despite the project, with skiers and other visitors traveling to Lake Tahoe resorts for recreation, irrespective of the project. (The DEIR treated each of these trips as "new," and attributed to the project 100 percent of the GHG emissions of these trips.)

Further, the DEIR focuses on the post-2020 timeframe, when most of the buildout would be expected. The DEIR lists a number of policies associated with the project (the specific plan) that would result in less GHG emissions potential, although they are not considered in the GHG emissions calculations provided in the DEIR and they are worded in a manner that suggests they are optional (but may become mandatory if needed to achieve mitigation targets, see Mitigation Measure 16-2 on page 16-19 of the DEIR). Therefore, the emissions calculations presented in the DEIR conservatively estimate GHG emissions for the project. This is discussed further, below.

However, the DEIR did not examine consistency with programs that have been adopted for the purpose of meeting statewide GHG reduction goals, although many programs are relevant. As shown in Table 16-2 of

the DEIR, the three primary sources of GHG emissions from the project are associated with fuel consumption for vehicle trips (31 percent of GHG emissions), propane use for heat (43 percent), and electricity consumption at power plants (24 percent). Together, these sources account for 44,914 of the 45,401 $MTCO_{2e}$/year (i.e., 99 percent) of the GHG emissions associated with the project. Each of these sources is already regulated in a way that reduces their GHG emissions potential, as discussed below.

One regulatory program of importance that addresses each of these sources but was not considered in the DEIR analysis is the ARB Cap-and-Trade program. According to the ARB (ARB 2015):

> The Cap-and-Trade Program is a key element of California's climate plan. It sets a statewide limit on sources responsible for 85 percent of California's greenhouse gas emissions, and establishes a price signal needed to drive long-term investment in cleaner fuels and more efficient use of energy. The program is designed to provide covered entities the flexibility to seek out and implement the lowest cost options to reduce emissions.
>
> Scope
> - Program covers about 450 entities.
> - Starts in 2013 for electricity generators and large industrial facilities emitting 25,000 MTCO2e or more annually.
> - Starts in 2015 for distributors of transportation, natural gas, and other fuels.
> - In 2014, California's program linked with the Canadian province of Québec.
> - Designed to link with similar trading programs in other states and regions.
>
> The Cap
> - Set in 2013 at about 2 percent below the emissions level forecast for 2012.
> - Declines about 2 percent in 2014.
> - Declines about 3 percent annually from 2015 to 2020.
>
> Compliance and Enforcement
> - Every year, covered entities turn in allowances and offsets for 30 percent of previous year's emissions.
> - Each compliance period, covered entities turn in allowances and a limited number of offsets covering the remainder of emissions in that compliance period.
> - If the compliance deadline is missed or there is a shortfall, four allowances must be provided for every ton of emissions that was not covered in time.
> - The program includes mechanisms to prevent market manipulation.
> - ARB has a market monitoring group that coordinates with state and federal agencies on market oversight.

This program addresses and regulates 85 percent of the GHG emissions from the California economy. The only sources not captured are biological emissions (dairies, forests, wetlands, etc.). (There are some fugitives from industrial sources that cannot be covered because it is difficult to measure and quantify them). The program limits the quantity of emissions produced by GHG emitting sources (i.e., power plants, gasoline and other fuels use, etc.) so that AB 32 goals will be met. Emissions cannot exceed the AB 32 goals under this regulatory program. Cap-and-Trade is a market-based program that allows buying and trading for GHG credits and onsite GHG reductions through investments in clean energy. The update to the Scoping Plan (see DEIR pages 16-4 and 16-5) will address the statewide target beyond the year 2020. Amendments

to the Cap-and-Trade Regulation will address program caps post 2020. As of this writing, ARB has not established links between CEQA, land use projects, and the Cap-and-Trade program. The update to the Scoping Plan may address these links (Sahota, pers. comm., 2016). Title 17 of the California Code of Regulations (CCR), sections 95801-96022, provides the regulatory framework for the Cap-and-Trade program.

- Fuel used for vehicle trips: The Advanced Clean Cars suite of regulations along with the Low Carbon Fuel standard address changes in fleet mileage and carbon potential of gasoline. These programs are factored in to the GHG emissions calculations in the DEIR (with increased credit for the effectiveness of these programs in the buildout years after 2020 as these regulations take hold and newer, more GHG-efficient vehicles replace older, less GHG-efficient vehicles throughout the state). Fuel is also subject to the Cap-and-Trade Regulations. Cap-and-Trade Regulations are not considered in the analysis of GHG emissions associated with the project; however, as of January 1, 2015, every gallon of fuel purchased by drivers has a cost element attributed to Cap-and-Trade (see CCR sections 95812[d] and 95851). Because GHG emissions from vehicle fuels are part of a statewide emissions cap, some air districts have argued that these emissions do not need to be accounted for on a project-basis, because they have already been mitigated (see discussion about the San Joaquin Valley Air Pollution Control District's [SJVAPCD] view, below).

- Propane use: Propane, like fuel for cars, is regulated under the Cap-and-Trade Regulations (see CCR sections 95812[d] and 95851). The same question as raised above, of whether emissions should be attributed to an individual project, applies to propane combustion; if already capped statewide to comply with AB 32 targets, are the emissions counted again when considered in an individual project? As with vehicle fuels, the DEIR did not factor the implications of the Cap-and-Trade program into the analysis of propane emissions. However, building efficiency standards that were developed from the Scoping Plan are considered in the analysis of the amount of estimated propane used for space and water heating.

- Electricity consumption: Electricity emissions occur at power plants, and are subject to regulations as part of the Renewable Portfolio Standard (RPS), which set a target that 33 percent of all electricity in California shall be generated by renewable (non-GHG emitting) sources by 2020. SB 350, passed after release of the DEIR, increased this target to 50 percent by 2030. The 33 percent RPS target was not considered in the DEIR because, at the time the DEIR was prepared, insufficient data was available for the utility that would serve the project; the 50 percent RPS target is not included because legislation was passed after the DEIR was released. However, in both instances the GHG emissions from electricity consumption are overstated in the DEIR. The DEIR did, on the other hand, include reduced electricity demands (relative to BAU) resulting from Scoping Plan-related, Building Efficiency Standards (see DEIR pages 16-6 and 16-7). GHG emissions associated with electricity generation are also subject to the Cap-and-Trade program, again raising the question of redundant counting.

Therefore, as it relates to 99 percent of the GHG emissions associated with the project, applicable GHG-reducing regulations are followed, but the project has virtually no role in this. That GHG reductions from these regulations are not attributed to this (or any) project is neither "good nor bad"; rather, it is a recognition that the State believes GHG emissions reductions are very important, and has established programs that will dramatically reduce GHG emissions statewide and independent of local land use actions and decisions on specific projects.

Some air districts in California have approved of the use of the Cap-and-Trade program as a geographically-specific regulation employed for the reduction of GHG emissions at a project level. The SJVAPCD, for instance, adopted the following policy on June 25, 2014 (SJVAPCD 2014):

> The District has determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA, for two separate and distinct reasons:

1. *Cap-and-Trade regulation is an Approved GHG Emissions Reduction Plan:*

As discussed above, ARB's Cap-and-Trade regulation is an adopted statewide plan for reducing or mitigating GHG emissions from targeted industries and is supported by an environmental review process that has been successfully defended in court equivalent to, and compliant with CEQA requirements.

Consistent with CCR section 15064(h)(3), the District finds that compliance with ARB's Cap- and-Trade regulation avoid or substantially lessen the impact of project specific GHG emissions on global climate change. The District also finds that the ARB's Cap-and-Trade regulation was supported by an appropriate CEQA-equivalent analysis. The District therefore concludes that GHG emissions increases subject to ARB's Cap-and-Trade regulation would have a less than significant individual and cumulative impact of climate change, and

2. *Cap-and-Trade Regulation Requires Mitigation of GHG Increases:*

GHG emissions addressed by the Cap-and-Trade regulation are subject to an industry-wide cap on overall GHG emissions. As such, any growth emissions must be accounted for under that cap, such that a corresponding and equivalent reduction in emissions must occur to allow any increase. Further, the cap decreases over time, resulting in an overall decrease in GHG emissions. Therefore, it is reasonable to conclude that implementation of the Cap-and-Trade program will and must fully mitigate project-specific GHG emissions for emissions that are covered by the Cap-and-Trade regulation.

The PCAPCD had not recommended (or commented on) this same approach; however, the SJVAPCD's approach has merit.

The relevant point is that the project would comply with all applicable regulations promulgated to reduce GHG emissions, including building standards. However, outside of the Cap-and-Trade Regulations, no regulations or performance standards are available to directly control VMT from cars, emissions from propane use, and emissions related to generating electricity that would supply the project. Because ARB has not established a direct link between how GHG emissions are capped/reduced through the Cap-and-Trade program and CEQA, this EIR does not rely on Cap-and-Trade as a regulatory program that already accounts for the same emissions from this specific project. Further, because Cap-and-Trade currently only addresses 2020 emissions targets and the project would be built out mostly after this time, this EIR cannot currently rely on Cap-and-Trade to address post 2020 targets. The program will, however, undoubtedly continue to be implemented into the future in California. The next update to the Scoping Plan, currently in preparation by ARB, is expected to address future targets, but because the update is not yet available, it cannot be relied upon at this time. (See, also, memorandum from Ramboll in Appendix G).

Mitigation Effectiveness and Consideration of Additional Mitigation

The DEIR described several VSVSP policies that would reduce GHG emissions (DEIR pages 16-10 through 16-12), such as exceedance of Title 24 energy efficiency standards by 15 percent, use of solar and other renewable energy options, efficient lighting systems, water efficiency, alternative fuels in transit vehicles, etc. Because many of these policies were not firm (e.g., "…construction is encouraged to exceed…", "…may be reduced…"), the DEIR did not calculate the potential effectiveness of these measures, and instead required that certain targets were met as subdivision maps are submitted for approval.

However, the County determined that the effectiveness of these measures should be calculated so that a "toolbox" of measures could be considered to meet mitigation targets, enabling the County to better understand the feasibility of attaining the GHG reduction goals. Appendix G of this document contains detailed information regarding the effectiveness of various measures in reducing GHG emissions. As documented, GHG emissions can be reduced by more than 5,000 MT CO_2e/year based on application of these onsite GHG reduction measures. Examples of GHG emissions reduction potential for the buildout year of 2037 include:

- Installation of Energy Star Appliances—GHG reduction of over 75 MT CO2e/year
- Third Party HVAC Commissioning—GHG reduction of 315 MT CO2e/year
- LED and other Energy Efficient Lighting—GHG reduction of 225 MT CO2e/year
- Exceed Title 24 Building requirements by 15%–GHG reduction of 37 MT CO2e/year
- Energy covers on pools and spas—GHG reduction of 1,496 MT CO2e/year

A variety of other measures are included that result in the total reduction of over 5,000 MT CO_2e/year, and they are detailed in Appendix G, along with GHG reduction potential, including use of solar panels, cool roofs, planting additional trees, improved waste diversion, electric vehicle charging stations (facilitating the use of more electric vehicles), transit improvements, alternative fuel vehicles for Olympic Valley transit, and other measures. The reduction potential of more than 5,000 MT CO_2e/year was carefully calculated to ensure that overlapping measures were not double credited, and that programs such as transit improvements were not overestimated.

These measures are further described in the revisions to the DEIR text, below.

Conclusion

The DEIR conclusion with respect to GHG emissions would not be changed by the considerations evaluated in this master response. The GHG emissions would exceed the PCAPCD Tier I mass emissions threshold of 1,100 MTCO_2e/year, future targets are expected but have not been adopted, and compliance with future targets is unknown. When considering mitigation measures and their effectiveness, it is clear that emissions can be substantially reduced, as stated in the DEIR, but the impact would remain potentially significant and unavoidable. None of the conditions requiring recirculation of an EIR result from these considerations (see also the Master Response regarding recirculation, below).

Moreover, none of the conclusions with respect to alternatives would change, especially in light of the 1,100 MTCO_2e/year threshold.

- The No Project-No Development Alternative (DEIR Alternative 17.3.2) would not generate new GHG emissions, as stated in the DEIR, so no impacts would result.

- The No Project-SVGPLUO Alternative (DEIR Section 17.3.3) would generate roughly 40 percent less GHG emissions than the project, based on relative size and traffic generation characteristics, which is approximately 23,385 MTCO_2e/year (assuming the same mitigation as the project), based on a re-calculated post-mitigation emissions total for the project of 38,975 MTCO_2e/year (see analysis below in the changes to the DEIR text). This would be less than the project but significant and unavoidable.

- The Reduced Density Alternative (DEIR Section 17.3.4) would generate roughly 19,500 MTCO_2e/year after mitigation (50 percent of the project), less than the project but significant and unavoidable.

- The Preservation of Historical and Water Resources Alternative (DEIR Section 17.3.6) would result in roughly 85 percent of the development of the project, so would generate an estimated 33,000 MTCO_2e/year, less than the project but significant and unavoidable.

- Neither of the other two alternatives, Widen Squaw Valley Road (DEIR Section 17.3.5) or the Alternative Water Tank Location (DEIR Section 17.3.7) would result in noticeable changes to GHG emissions compared to the project.

Changes to DEIR Text

As a result of these considerations, several changes to Chapter 16 of the DEIR are provided below.

Page 16-4 of the DEIR, regarding the regulatory setting, is revised as follows:

EXECUTIVE ORDER S-3-05

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

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

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

EXECUTIVE ORDER B-30-15

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

Page 16-6 of the DEIR, regarding the regulatory setting, is revised as follows:

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

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

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

Page 16-9 of the DEIR, regarding significance criterion, is revised as follows:

PLACER COUNTY

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

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

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

- for the evaluation of construction-related emissions, PCAPCD recommends using the mass emission threshold of 1,100 metric tons of carbon dioxide-equivalent per year (MTCO2e/year);

- for the evaluation of operational emissions PCAPCD recommends a 2-tier approach:

  - (Tier I) Operational emissions of a project would not have a significant impact on the environment if they are less than 1,100 $MTCO_2e$/year, and

  - (Tier II) Projects with operational emissions that exceed 1,100 $MTCO_2e$/year, but are able to demonstrate a 21.7 percent reduction from a "no action taken" (NAT) scenario compared to the proposed project operating in 2020 would not conflict with ARB's Scoping Plan.

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

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

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

Page 16-13 of the DEIR, regarding estimation of GHG emissions, is revised as follows:

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

Page 16-14 of the DEIR, regarding GHG efficiency analysis, is revised as follows:

GREENHOUSE GAS EFFICIENCY ANALYSIS

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

would occur no sooner than 2037. The 2020 analysis year is used to compare these two scenarios because 2020 is the target year for achieving the GHG reduction goal identified by AB 32. As described in Section 16.2.2, "State," of the Regulatory Setting above, AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. However, in recognition of these unrealistic buildout assumptions, this EIR also examines what may occur beyond 2020, including a discussion of GHG reduction targets that may be established by ARB and/or the California State Legislature beyond 2020, what specific regulations may be developed to achieve those targets, and the ability and likelihood the project would comply with those regulations to meet those targets.

The purpose of the efficiency analysis is to determine whether the full-buildout 2020 scenario is at least 21.7 percent more GHG efficient than the NAT scenario. An efficiency target of 21.7 percent is used because, as explained in Section 16.2.2, "State," of the Regulatory Setting, above, ARB calculated that a reduction of 21.7 percent from 2020 NAT emissions is needed for California to reach 1990 emission levels (ARB 2011). This should not be implied to mean that a 21.7 percent reduction in GHG emissions compared to 2020 NAT is not significant; rather, it is only intended to reflect if the project is as efficient as the state, as a whole, is expected to be in order to attain AB 32 requirements. In reality, new projects, such as this project, may need to perform more efficiently than the state, as a whole, in order for such projects to help the state attain its goals. This is because new projects may be more capable of being GHG-efficient than existing development in the statewide economy, wherein the existing development could require significant modifications to hit efficiency targets. There are no current mechanisms available to determine the level of GHG-efficiency needed on a single project in order to determine if it fits within the State's Scoping Plan targets.

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

Pages 16-15 through 16-18 of the DEIR, concerning operational impacts, are revised as follows:

IMPACT 16-2: OPERATIONAL GREENHOUSE GAS EMISSIONS.

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

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

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

33 percent (2020) and 50 percent (2030 and after) can be applied to the electricity-related indirect GHG emissions associated with the project. ~~This is explained further below.~~

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

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

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

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

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

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

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

As shown in Table 16-2, upon full buildout, GHG emissions associated with operation of the proposed project would exceed the Tier I mass emission threshold of 1,100 MT CO_2e/year, which is a significant impact. To help characterize the nature of the impact, this analysis evaluates the GHG efficiency in which the proposed project would operate compared to the NAT scenario in 2020. Table 16-3 summarizes the results of emissions estimates for both scenarios.

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

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

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

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

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

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

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

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

3 ~~Emissions associated with electricity consumption would be lower in the full-buildout scenario due to implementation of renewable requirements in the electric power generation industry; however, this reduction is not accounted for in this analysis because complete information about the GHG intensity factors (historical and projected) for the local utility, California Pacific Electric Company (CalPeco), are not available. CalPeco became the electric service provider to Olympic Valley in 2011 after it acquired assets from Sierra Pacific Power Company (Liberty Energy 2010). For both scenarios, emissions associated with electricity consumption were estimated using the GHG intensity factor for Sierra Pacific Company for 2008 in CalEEMod.~~ The electricity emission factor for the NAT scenario uses the 2006 through 2008 average emission factor from Sierra Pacific Company (dba NV Energy), which was the electric service provider to Olympic Valley until 2010. Information about GHG intensity factors (historical and projected) for the local utility, California Pacific Electric Company (CalPeco), are not available. For the Full-Buildout 2020 scenario, the average non-renewable emissions were used with the application of 33% renewables due to the Renewable Portfolio Standard requirement for 2020.

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

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

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

Source: Modeling conducted by Ascent Environmental in 2015

Post 2020 Considerations

As described in Section 16.2.2, ARB is working toward recommending goals that extend beyond 2020 and, further, Executive Order SB-3-05 set a target of reducing emissions to 80 percent below

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

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

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

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

The project would produce substantial levels of GHG emissions. Implementation of Mitigation Measure 10-2, which requires construction and operation of land uses and facilities developed under the Specific Plan to not generate emissions of ozone precursors that exceed PCAPCD's mass emission thresholds, would likely have the co-benefit of reducing project-related GHG emissions as well. Also, as previously stated, the Specific Plan contains many policies that, if strictly implemented, would result in additional GHG reductions, including the requirement that a minimum of 25 percent of new shuttle services within the Olympic Valley will use alternative fuels (Policy CP-5), that individual buildings would be designed to a level equivalent to at least the Silver rating of the U.S.

Green Building Council's Leadership in Energy & Environmental Design (LEED) certification program or other comparable rating, and other actions are taken to reduce GHG emissions (Policies CC-13 and CC-15). The efficacy of the Specific Plan policies cannot be predicted, in large part because several are not mandatory (in some instances, actions are "encouraged," "should" be implemented, would be implemented "if feasible," etc.). The implementation of these policies, as well as Mitigation Measure 10-2, would result in additional GHG efficiency beyond what is shown in Table 16-3. This DEIR cannot determine if the project would meet future thresholds that have not been established because it would be purely speculative to do so.

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

Page 6-19 of the DEIR, concerning mitigation, is revised as follows:

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

The state legislature or Governor's Office may establish new GHG targets or other programs or metrics that apply ~~for the period~~ both before and after 2020, as discussed in the *First Update to the Climate Change Scoping Plan*, released by ARB in May 2014 (and discussed above in Section 16.2.2) and in response to *CBD v CDFW* as it relates to connecting Scoping Plan targets to individual projects. Any projects processed by the County ~~after 2020~~ will be required to reduce, to the extent needed and feasible, GHG emissions such that the project operates within the targets or adopted plan established at the time the project is submitted for approval, as explained below.

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

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

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

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

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

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

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

Significance after Mitigation

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

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

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

~~As stated above, the proposed project would achieve a reduction in greenhouse gas emissions of 24.7 percent by 2020, which would be a less than significant impact. However~~ Given the current date and timing for potential project approval (mid 2016) and the 25 year project buildout, it is doubtful that much of the project would be constructed prior to 2020. It is not known whether the proposed project would achieve threshold targets ~~identified for the years after 2020~~, because such targets do not yet exist and it would be speculative to assume what they might be and/or what regulations will be in place to help achieve them. Implementation of Mitigation Measure 16-2 would

reduce GHG emissions associated with subsequent project subdivisions ~~proposed after 2020~~. However, important factors are not currently known: the GHG emissions target in effect at the time that subdivisions are submitted ~~after 2020~~; the effectiveness of regulatory actions already adopted as part of the implementation of the Global Warming Solutions Act of 2006; consideration by ARB as to whether Cap-and-Trade regulations already mitigate the emissions associated with regulated sources (fuel, electricity), and the potential for application of new regulations and their effectiveness. Further, the cost and feasibility of certain policies that would be mandated as mitigation are not known. Therefore, it would be speculative to determine that GHG impacts, if they were to occur, would be feasibly mitigated to adopted GHG target levels ~~beyond 2020~~. Further, unless Cap-and-Trade regulated sources are considered already mitigated by ARB, the project could not feasibly reduce emissions to below the 1,100 MT CO_2e/year mass emission threshold established by PCAPCD (see discussion above regarding the mitigation toolbox). For this reason, and because the project would emit a substantial level of GHG emissions, the residual impact is **potentially significant and unavoidable**.

3.1.18 Master Response: Recirculation

The County received comments stating that the County should revise and recirculate the DEIR for an additional round of public review and comment. The following response discusses the standards generally applicable to this issue, and applies those standards to the comments requesting recirculation.

The lead agency is required to recirculate a DEIR when the agency adds "significant new information" to the EIR after the close of the public comment period but prior to certification of the FEIR (PRC Section 21092.1; State CEQA Guidelines Section 15088.5.). "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement" (State CEQA Guidelines Section 15088.5(a)). "Significant" new information includes information showing that "(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented [;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance" (State CEQA Guidelines Section 15088.5 (a)(1), (a)(2)).

The Resources Agency adopted Section 15088.5 of the State CEQA Guidelines in order to incorporate the California Supreme Court's decision in *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112 (Laurel Heights II). According to the Supreme Court, the rules governing recirculation of a DEIR are "not intend[ed] to promote endless rounds of revision and recirculation of EIRs" (Laurel Heights II, supra, 6 Cal.4th at p. 1132). Instead, recirculation is "an exception, rather than the general rule" (*Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 221).

Under these standards, a change to a proposed project, made in response to comments on a DEIR, generally does not trigger the obligation to recirculate the DEIR. "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal" (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199; see *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11).

As these cases recognize, CEQA encourages the lead agency to respond to concerns as they arise, by adjusting a project or developing mitigation measures, as necessary. That a project evolves to address such concerns is evidence of an agency performing meaningful environmental review. A rule requiring recirculation of the DEIR any time a project changes would have the unintended effect of freezing the original proposal, and of penalizing the lead agency or the project sponsor for revising the project in ways that may be environmentally benign or even beneficial. In light of this policy concern, the courts uniformly

hold that the lead agency need not recirculate the DEIR merely because the proposed project evolves during the environmental review process. (See, e.g., *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1061-1065 [project modification requiring consultation with Coast Guard regarding building designs did not require recirculation of DEIR]; *South County Citizens for Smart Growth v. County of Nevada* (2013) 221 Cal.App.4th 316, 329-332 [identification of staff-recommended alternative after publication of FEIR did not trigger obligation to recirculate DEIR because alternative resembled other alternatives that the EIR had already analyzed]; *Western Placer Citizens for an Agricultural and Rural Environment v. County of Placer* (2006) 144 Cal.App.4th 890, 903-906 [revision in phasing plan did not trigger recirculation requirement because revision addressed environmental concerns identified during EIR process]; Laurel Heights II, supra, 6 Cal.4th at pp. 1141-1142 [FEIR's identification of night-lighting glare, and adoption of corresponding mitigation measures, did not trigger recirculation requirement]; *Long Beach Sav. & Loan Assn. v. Long Beach Redevelopment Agency* (1986) 188 Cal.App.3d 249, 262-263 [adding mitigation did not require recirculation of negative declaration where mitigation was added to respond to comments].)

Similarly, information that clarifies or expands on information in the DEIR does not require recirculation. (See, e.g., *North Coast Rivers Alliance v. Marin Municipal Water Dist. Bd. of Directors* (2013) 216 Cal.App.4th 614, 654-656 [addition of a hybrid alternative to the FEIR did not trigger duty to recirculate the DEIR]; *Mount Shasta Bioregional Ecology Center v. County of Siskiyou*, supra, 210 Cal.App.4th at p. 221 [addition of two reports to FEIR where DEIR had already summarized the reports' contents]; *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 219-224 [information regarding presence of cultural resources on property did not require recirculation because information amplified on information that was already in DEIR]; *Silverado Modjeska Recreation and Park Dist. v. County of Orange* (2011) 197 Cal.App.4th 282, 305-307 [new information regarding potential presence of protected species in vicinity of project site did not require recirculation because previous EIRs already disclosed that species might be present]; *California Oak Foundation v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 266-268 [letters addressing seismic risks did not trigger duty to recirculate DEIR, where letters recommended further analysis but did not contradict conclusions in DEIR]; *Cadiz Land Co. v. Rail Cycle, L.P.* (2000) 83 Cal.App.4th 74, 97 [commenter's disagreement with analysis of groundwater flow in EIR did not require recirculation because substantial evidence supported EIR's analysis; lead agency had discretion regarding which expert to rely upon]; *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1148-1151 [regulatory and planning efforts to protect endangered species did not require recirculation of DEIR because analysis already contained detailed analysis of project's physical impacts on that species]; *Fort Mojave Indian Tribe v. California Department of Health Services* (1995) 38 Cal.App.4th 1574, 1605-1606 [designation of "critical habitat" under Endangered Species Act was not "significant new information" where EIR analyzed physical impacts to species and its habitat]; *Marin Municipal Water Dist. v. KG Land California Corp* (1991) 235 Cal.App.3d 1652, 1666-1668 [clarifying information regarding potential length of moratorium was not "significant new information"].)

There are instances in which the courts have ruled that an agency erred by failing to recirculate a DEIR. In particular, in *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, the EIR for a large development project contained no analysis of the impact on groundwater pumping on surface water flows in a river that provided habitat for endangered fish species. In responses to comments from expert resource agencies, the FEIR conceded that the pumping could dry up the river at the same time the fish would otherwise migrate through the area. The disclosure of a new significant impact, for which no mitigation was offered, triggered the duty to recirculate the DEIR (40 Cal.4th at page 447-449; see also *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 128-131 [County had to revise and recirculate the DEIR to disclose potential impacts of reducing off-site groundwater pumping to offset increase in pumping to provide water supply for proposed development project]; *Grey v. County of Madera* (2008) 167 Cal.App.4th 1099, 1120 [where County included new mitigation measure in FEIR, and record contained no evidence of the feasibility of that measure, County had to recirculate the DEIR to receive comments on that measure].) Moreover, if a DEIR is found to be "woefully inadequate," such that meaningful public review and comment are precluded, then the agency must recirculate the document. (See *Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043,

1050-1052 [DEIR omitted entirely any discussion of cumulative impacts, despite court order requiring such analysis].)

The following discussion applies these standards to the comments stating that the County should recirculate the DEIR. In particular, the discussion focuses on whether the information provided in the comment is new, and whether that information discloses:

- a new significant impact that the project or mitigation would cause,
- an impact that would be substantially more severe unless mitigation is adopted that avoids the impact,
- a feasible project alternative is available that would avoid a significant impact, but the applicant will not adopt it, or
- that the DEIR is "fundamentally and basically inadequate" such that meaningful public comment was precluded (State CEQA Guidelines Section 15088.5(a)).

In the instance of the VSVSP, a number of comments were provided on the DEIR (as can be seen in this document, which addresses those comments). Comments were provided on nearly every impact addressed in the DEIR. Further, comments were also provided on the alternatives, and new alternatives (more accurately, variations on the alternatives already included) were recommended by commenters. Finally, two California Supreme Court decisions concerning CEQA were published after release of the DEIR, one of which addressed a methodology used throughout California for consideration of significant greenhouse gas effects and used, in part, in the DEIR.

The responses to comments are extensive, in large part because the comments were also extensive. The responses to comments provide the following information:

- First and foremost, the responses address the environmental concerns raised by the comments, and describe how they are addressed in the DEIR;
- They provide corrections to the DEIR text, where such corrections are warranted;
- They expand on or provide minor clarifications to information already included in the DEIR in those instances where comments question this information;
- They result in proposals for new mitigation measures that may more effectively reduce already identified significant environmental impacts of the project;
- They address recommendations for alternatives to the project, including whether these recommendations are already included in the alternatives evaluated in the DEIR;
- They address other information that has arisen since release of the DEIR, including modifications to the proposed project and the information in the Supreme Court rulings on CEQA issues that were published after the DEIR was released.

However, none of the conditions warranting recirculation of a DEIR, as specified in State CEQA Guidelines Section 15088.5 and described above, has occurred. As a result of responses to comments and the additional of new information, no new significant impacts would result; there is no increase in the severity of a significant impact identified in the DEIR, following mitigation; no feasible alternatives have been recommended that would avoid a significant impact, wherein the applicant has refused to adopt such an alternative; and as to the DEIR adequacy, the County believes the DEIR was complete and fully compliant with CEQA.

3.2 COMMENTS AND RESPONSES

Table 1-1 in Chapter 1, “Introduction,” presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.