

However, for the reasons described under responses to comments 012b-2 through 012b-16, the population and employment projections are based on facts and reasonable assumptions. Thus, the indirect impacts associated with population and employment projections are adequate and no changes to the DEIR are necessary.

012b-18

The comment states that a thorough and adequate growth-inducing analysis and recirculated CEQA document must be prepared. However, for the reasons discussed under responses to comments 012b-2 through 012b-16, the analysis is adequate and no changes to the DEIR reflecting “significant new information” triggering the need for recirculation pursuant to CEQA Guidelines section 15088.5 are necessary. Also, see the Master Response regarding recirculation.

013



July 16, 2015

Mr. Alex Fisch, Project Manager
Ms. Maywan Krach, Environmental Coordination Services
Placer County Community Resources Development Agency
3091 County Center Drive
Auburn, CA 95603

cc: Mr. Michael J. Johnson, AICP, Agency Director

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

Dear Placer County CRDA:

As you know, the Truckee North Tahoe Transportation Management Association (TNT/TMA) is a non-profit membership-based mutual benefit corporation organized under the California Nonprofit Mutual Benefit Corporation Law. Established in 1990, the TNT/TMA works with its members and partners to address impacts and opportunities associated with traffic congestion, transportation and transit systems, and community mobility.

The TMA advocates and promotes multi-modal mobility solutions throughout the Truckee-North Tahoe "Resort Triangle." In doing so, our goal is to help make the area a more attractive and advantageous place to reside, conduct business, recreate and vacation.

We are pleased to note for the record that Squaw Valley Resort and Alpine Meadows Resort have been active TMA members since the organization's inception. The combined company of Squaw Valley/Alpine Meadows has maintained its membership. The company has also maintained, and in some cases, stepped up its support for transit services coordinated and promoted by the TMA. Company senior management has demonstrated exemplary vision and leadership in the planning and implementation of regional transportation and transit services.

Village at Squaw Valley Specific Plan

We have reviewed the DEIR for this Specific Plan, with a focus on the Transportation and Circulation and Air Quality sections. We recognize modifications have been made since the

013-1

original Specific Plan was submitted and it is likely that additional changes will be made as the project development and review process continues. Whatever plan is finally considered by Placer County, it is clear the specific projects ultimately constructed will have transportation, circulation, and air quality impacts. Accordingly, in addition to mitigation measures identified as necessary to address these impacts, the package of measures or final conditions of project approval should include a requirement for the project applicant to maintain its membership in the TNT/TMA. This request is consistent with others we have made and that the County has incorporated into the appropriate project documents. A customized sample of the language we urge the County to consider is shown below:

013-1
cont.

“The project applicant shall maintain membership in the Truckee North Tahoe Transportation Management Association (TNT/TMA) at a level to be determined by the TNT/TMA Board consistent with identified impacts of the larger scale of development, and participate in the programs developed, offered, or otherwise supported by the TNT/TMA to reduce vehicle demand and encourage the use of multi-modal transit and ridesharing programs. If, at any time, the project applicant dissolves ownership in the project, any and all subsequent owner(s) or association(s) or management entities shall acquire and maintain the responsibility for TNT/TMA membership.”

Please contact me should you have any questions regarding this letter. Thank you for your consideration and actions in support of our request.

Sincerely,



Jaime Wright
Executive Director

013

Truckee North Tahoe Transportation Management Association
Jaime Wright, Executive Director
July 16, 2015

013-1

The comment states that a mitigation measure or project condition should be added to the DEIR that requires the project applicant to maintain its membership in the Truckee North Tahoe Transportation Management Association (TNT/TMA) and participate in agency programs. The project applicant, as the comment notes, has been an active member of the TNT/TMA since the organization's inception. The project applicant has indicated to County staff that they plan to continue their membership. The project's potential impacts to transit services are described under Impact 9-7 of the DEIR. Mitigation Measure 9-7 in the DEIR requires the project applicant to provide fair share funding or form a Community Service Area or Community Facilities District to fund the costs of increased transit services. The following mitigation measure is added to the DEIR, consistent with past County environmental documents, to ensure that the project applicant maintains its membership in the TNT/TMA:

Mitigation Measure 9-7b: Maintain Membership in the Truckee North Tahoe Transportation Management Association (TNT/TMA).

The following mitigation measure, while not required to achieve or maintain a less-than-significant impact conclusion, would further reduce the project's impacts to transit.

Prior to approval of improvement plans/final maps, the project applicant shall maintain membership in perpetuity in the Truckee North Tahoe Transportation Management Association (TNT/TMA). Once commercial and homeownership groups have been formed, the project applicant shall shift the TNT/TMA membership to the associations and the associations shall maintain membership in perpetuity. It is not anticipated that membership will need to be cancelled; however, if for a reason unknown at this time cancellation of the membership is required, it shall be mutually agreed to by the County and the entity responsible for paying the annual dues.

014

TRUCKEE RIVER WATERSHED COUNCIL

PO Box 8568
Truckee, CA 96162
530-550-8760
www.truckeeriverwc.org

July 17, 2015

Ms. Maywan Krach, submitted via cdraecs@placer.ca.gov

Environmental Coordination Services

Community Development Resource Agency

3091 County Center Drive, Suite 190

Auburn, CA 95603

Re: Comments on Draft EIR for Village at Squaw Valley Specific Plan

Ms. Krach:

The Truckee River Watershed Council (TRWC) appreciates the opportunity to provide comment on the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley Specific Plan.

The mission of TRWC is to bring the community *Together for the Truckee* to protect, enhance and restore the Truckee River watershed. Based on our mission, we reviewed the DEIR with interest and offer the following comments.

Development can help (or hurt). Our watershed has a 150 year history of land uses that have led to degradation of water quality, water supply, and habitat. Past developments in Olympic Valley are part of these legacy land uses and have resulted in significant detriment to:

- water quality (Squaw Creek TMDL, Lahontan Water Board, 2006);
- habitat (i.e. loss of the Lahontan Cutthroat trout, the only native trout);
- water supply.

The Village at Squaw Valley Specific Plan is an opportunity to address these impacts on the mountain and in the village and from the headwaters of Squaw Creek to its confluence with the Truckee River.

014-1

Help Squaw Creek: Expand the reaches to be restored and make the restoration a condition of approval. The proposed stream work is an enhancement of the Trapezoidal Channel and of the Olympic Channel. Within the existing development of Squaw Valley, true restoration cannot happen. As such the proposed work is already a significant compromise. But more geomorphic and hydrologic benefit can be realized than is being proposed. The restoration should be expanded to include the south fork of Squaw Creek above the confluence with the north fork (Shirley Canyon) of the creek.

014-2

Additionally, all restoration should be a condition of approval for the specific plan.

Help the Restoration: Schedule restoration as "Phase 0." Due to Squaw Valley's geographic location and topography the interaction of meteorology and climate result in Squaw Valley being a significant source of flood flows and severe erosion, not only in Squaw Valley but through the entire Truckee River system down to Reno, NV. The legacy alteration of Squaw Creek has exasperated the potential flood threat in Squaw Valley and downstream. By including the restoration at the earliest phases we take the opportunity the development provides to address:

014-3

- decreasing the impact of flood flows;
- implementing water quality improvements immediately; and
- contributing toward attainment of the Squaw Creek TMDL

Additional benefits of moving the restoration to Phase 0 include grading and construction efficiencies across restoration and development, enhancing Squaw Creek as a visual "amenity" and demonstrating goodwill to the community.

Help the Trapezoidal Channel reach: Widen the bridge spans. The proposed restoration is constrained by the width of the existing bridges. The bridges were installed based on hydrologic modeling completed in the 1950s. Recognizing the opportunity provided this Specific Plan, the bridges should be replaced, using current hydrologic modeling to determine the appropriate span for floodplain restoration and for the flows moving the channel and.

014-4

Help Lower Squaw Creek: Create conformance of the restoration design of the Trapezoidal Channel. There is an opportunity to support the downstream restoration of Lower Squaw Creek and Meadow. This will significantly improve the potential success of the

014-5

Lower Squaw Creek restoration and improve water quality, water supply, and habitat throughout the entire watershed. The restoration work in the Trapezoidal Channel should be required to conform to the hydrology and aesthetics of the Lower Squaw Creek restoration design.

014-5
cont.

Help sustain ground and surface water: Accelerate the completion of the Pumping Management Plan to be completed before the Final EIR. We recommend the Final EIR be based on a completed Pumping Management Plan and on the most recent groundwater surface-water interaction studies. Increased groundwater production will have potentially significant impacts on surface water, sensitive habitats, groundwater patterns, recharge, and aquifer storage.

014-6

Again, we have an opportunity to correct past land use mistakes, use the best available information, and make decisions today that correct the mistakes of yesterday. Decisions about the health of lower Squaw Creek and meadow should not be based on after-the-fact monitoring and future plans and potentials.

Help improve water quality with stormwater management: Have robust stormwater management a condition of approval. Squaw Valley’s location at the headwaters of the Truckee River Watershed makes the protection of water quality crucial. Low impact development methods and active treatment systems should be incorporated into conditions of approval for the specific plan. Squaw Valley could set the standard for stormwater treatment in alpine development.

014-7

Help improve water quality with snowmaking management: Have robust snowmaking management a condition of approval. Due to the potential impacts on water supply, water quality and habitat, a complete snowmaking plan should be required as part of the Specific Plan. The contribution of snowmaking water use and storage is part of the cumulative effect on water supply and quality. The potential impact of snowmaking repairs and new infrastructure could be substantial.

014-8

Help the upper watershed: Address restoration in the headwaters. The DEIR does not address restoration of the headwaters areas of the Squaw Valley. Yet restoration of the upper reaches of the north and south Forks of Squaw Creek are vital to: the successful enhancement and restoration of the downstream reaches; decreasing flood flows; decreasing sedimentation; and improving riparian and meadow habitat. To address the

014-9

legacy issues of ski resort development and improve water quality, water supply, and habitat for the future, the Final EIR should address the upstream degradation.

014-9
cont.

Help the trails: improve to current standards and schedule into "Phase 0." The existing trail system is heavily used and poorly implemented. The trails are sources of erosion and water quality degradation from sheet flow and trail/stream crossings. User defined trails can impact wildlife, particularly during breeding and rearing periods. Use of trails will increase with the development of the village, so all trails should re-developed to current standards in "Phase 0" as a condition of approval.

014-10

In conclusion, TRWC's goal is to complete 50 high priority projects in the next ten years in order to improve the health and function of the Truckee River watershed. Restoration of Squaw Creek consistently ranks as a top priority for TRWC, our stakeholders, and the community at large. The development of the Village at Squaw Valley Specific Plan is an opportunity to fix water quality, water supply and habitat problems.

Thank you again for considering our comments.

Sincerely,



Lisa Wallace
Executive Director

014 Truckee River Watershed Council
Lisa Wallace, Executive Director
July 17, 2015

014-1 The comment is an introductory statement and does not address the content, analysis, or conclusions in the DEIR. Therefore, a response is not provided here.

014-2 The comment states that creek restoration should be expanded to include the south fork of Squaw Creek above the confluence with the north fork (Shirley Canyon) of the creek. Contrary to the comment, the proposed restoration plan is not limited to the Trapezoidal Channel and Olympic Channel. As described in Section 3.4.5, "Squaw Creek Restoration," of the DEIR, restoration activities are also proposed in the western portion of the plan area;

In the west side of the Village area, at the confluence of the North and South Forks of Squaw Creek, the proposed design provides for a widened and expanded floodplain area on the north bank to allow for a more gradual transition to the downstream trapezoidal channel and Squaw Valley Road bridge.

In addition, the incised channel portion of the stream to the east of the Far East Road bridge (confluence of Squaw Creek and the Olympic Channel) would be substantially widened to create natural meanders, floodplains, and wetlands. This proposed restoration design is depicted in Exhibits 3-18 through 13-20. While the project applicant proposes the restoration as part of the project, it also serves as mitigation for wetlands impacts. It is anticipated that the overall creek restoration program will provide sufficient acreage of wetland and riparian habitats to mitigate losses of these habitats resulting from the proposed project. CEQA requires that mitigation measures be "roughly proportional" to the impact that they address (Guidelines Section 15126.4(a)(4)). Requiring an expansion of creek restoration beyond that necessary to mitigate project impacts would be a violation of this CEQA principle.

The comment also states that creek restoration should be a condition of approval of the Specific Plan. Creek restoration is a component of the proposed project as described in Chapter 3, "Project Description," of the DEIR (see Section 3.4.5, "Squaw Creek Restoration"). The proposed timing of the creek restoration is described on page 3-38 of the DEIR as follows,

Creek restoration is proposed to be complete by the recordation with the County of the Final Map (a step in final development approval) that includes the 600th bedroom (i.e., about 40 percent of project development).

Note that this timing criteria, which is in accordance with the proposed Master Phasing Plan that would be approved concurrent with specific plan adoption, is for the completion of creek restoration, not the initiation of restoration activities. When the Placer County Planning Commission and Board of Supervisors consider project approval, creek restoration (as a component of the project) will be part of the decision-making process.

In addition, Mitigation Measure 6-1a, provided on pages 6-46 through 6-48 of the DEIR identifies several conditions tying creek restoration to County authorizations, such as:

An Improvement Plan for habitat restoration activities shall be prepared and submitted by the project applicant to the Planning Services Division for review concurrent with Improvement Plan Review. A Mitigation Monitoring Implementation Program (MMIP) for the replacement of wetlands/riparian vegetation shall be

prepared by a qualified wetland biologist. Said MMIP shall be submitted to the Planning Services Division concurrent with, or prior to the Improvement Plan, and shall comply with Article 18.28 of the Placer County Environmental Review Ordinance.

and

Prior to Improvement Plan approval, a Letter of Credit, Certificate of Deposit, or cash deposit in the amount of 100 percent of the accepted proposal shall be deposited with the Placer County Planning Services Division to assure on-going performance of the monitoring program.

- 014-3 See response to comment O14-2 regarding timing of creek restoration. Also, in addition to the principle of mitigation being roughly proportional to impacts, CEQA also includes the principle that there must be a nexus between impacts and mitigation measures (Guidelines Section 15126.4(a)(4)(B)). To require Squaw Creek restoration to be initiated prior to, or concurrently with the preliminary phases of project implementation (which would not have direct effects on wetland and riparian habitats), would require mitigation prior to significant impacts occurring.
- 014-4 The comment states that the existing bridges should be replaced and widened as part of the proposed creek restoration. It is unclear whether the comment is referring to the width of the bridge, such as how many traffic lanes it could accommodate, or the width/length of its span across Squaw Creek. Both scenarios are addressed.

Proposed improvements to the three existing bridges across Squaw Creek are described in Section 3.4.2, "Circulation and Parking," of the DEIR, as follows:

Three existing bridges would continue to provide access across Squaw Creek to the Village Core area. The existing Squaw Valley Road bridge (the most westerly bridge) currently provides two 12-foot travel lanes, a 7-foot shoulder, and an 8-foot sidewalk in each direction. The bridge would be widened to provide a 10-foot sidewalk on the both sides of the road. The existing Village East Road bridge (center bridge) would be preserved in its current configuration. This bridge provides two 12-foot travel lanes, two 8-foot shoulders, a 7-foot sidewalk on the west side of the structure, and a 5-foot path on the east side. The third bridge, located near the northeasterly corner of the plan area, is the existing Far East Road crossing. This bridge would be kept in its current location and reconfigured into two 12-foot travel lanes, with 8-foot sidewalks in each direction. It will also have a 7-foot shoulder/bike path, and curb and gutter.

As described above, the existing Squaw Valley Road bridge would be widened, the Far East Road bridge would be reconfigured, while the existing Village East Road bridge would be retained in its current configuration. These configurations are considered sufficient to adequately support anticipated vehicle, pedestrian, and bicycle traffic.

Bridges across Squaw Creek are shown as part of the restoration area exhibits provided in Chapter 3 of the DEIR; Exhibits 3-18, 3-19, and 3-20. As stated above, the Village East Road bridge would be preserved in its current configuration and the restoration effort would be designed to integrate with the existing bridge. However, the Squaw Valley Road Bridge and Far East Road Bridge would be reconfigured and widened. During this effort, the bridge designs would be integrated with the restoration effort and bridge spans may be lengthened/widened to better accommodate restoration efforts. However, increasing the bridge spans is not necessary to successfully achieve desired restoration of Squaw Creek.

- 014-5 The comment states that the restoration work in the trapezoidal channel should be required to conform to the hydrology and aesthetics of the Lower Squaw Creek restoration design. As described in Section 3.4.5, “Squaw Creek Restoration,” of the DEIR, “A conceptual restoration design has been prepared and describes in detail the objectives, proposed methods, and planned outcomes for restoration activities (Balance Hydrologics, Inc. 2014).” The design of the restoration would enhance the biology and restore natural hydrologic processes, including improved sediment entrapment in the upper reaches of the channel so that the lower reaches are not as affected by sediment as under existing conditions. This would improve the overall performance of the upper and lower creek by providing for a more natural condition. Regarding the aesthetics of the lower channel, it is unclear what is being requested by the comment, but the project would not be expected to affect the aesthetics of the lower channel. Furthermore, the VSVSP Squaw Creek restoration component has been designed specifically to allow for future restoration of the lower channel, as based on preliminary designs developed for Placer County and Friends of Squaw Creek.
- 014-6 The comment states that the FEIR should be based on a completed pumping management plan and the most recent groundwater surface water interaction studies. Extensive study was involved in the preparation of the WSA, and this information would be used to help design the well field for optimal performance. As described under Mitigation Measure 13-4 in the DEIR, the SVPSD is responsible for groundwater planning and management for most of the Olympic Valley, including the project area, and would operate wells providing groundwater to the VSVSP. Further, as described under this mitigation measure on pages 13-63 and 13-64,
- The SVPSD has also stated that it will prepare and implement a Pumping Management Plan, and may also elect to prepare a Groundwater Sustainability Plan (GSP) in accordance with the recent Sustainable Groundwater Management Act of 2014 (SGMA). Any SVPSD Pumping Management Plan will be included as a component of future updates to the [Groundwater Management Plan] or new GSP for the Groundwater Basin.
- ...
- Further, it is anticipated that, consistent with SVPSD’s existing practice, the groundwater plans would be reviewed and updated on a periodic basis as new wells are installed, monitoring data is evaluated, and when assessments of groundwater plan effectiveness, groundwater model refinement, and additional groundwater assessment reports are completed.
- 014-7 The comment states that stormwater management should be incorporated into the conditions of project approval. Proposed drainage improvements, including low impact development (LID) features as mentioned in the comment, are discussed in the DEIR on page 3-25 under the heading “Storm Drainage.” Proposed improvements are shown in Exhibit 3-13. When the Placer County Planning Commission and Board of Supervisors consider project approval, stormwater management (as a component of the project) will be part of the decision-making process.
- 014-8 The comment states that a complete snowmaking plan should be required as part of the Specific Plan. Snowmaking is part of the ongoing operations of the ski resort and is not part of the proposed project. Regarding the comment that snowmaking is part of the cumulative context for water supply and stormwater management, the water supply assessment includes snowmaking water (see Table 14-2, particularly the footnotes) and the text on page 14-4. As to stormwater management, runoff from the mountain that passes through the site would include snowmelt, including from snowmaking, and this would be included in the design for stormwater conveyance and water quality management. See the discussion under Impact 13-7 of the DEIR.

- 014-9 The comment states that the FEIR should address upsteam degradation at the headwaters of Squaw Valley. The proposed creek restoration component of the proposed project does not address upsteam degradation. Ongoing sediment source management is currently carried out by Squaw Valley Ski Resort with the intent of reducing sediment production from the upper watershed (Balance Hydrologics, Inc. 2014). However, the area upstream of the project is not within project boundaries and would not be affected by the project, and the applicant is not proposing restoration activities in this area.
- 014-10 The comment states that trail improvements should be completed in “Phase 0” as a condition of project approval. See responses to comment letter F2 regarding trails.



July 13, 2015

015

Maywan Krach, Community Development Technician
 Placer County, Planning Services Division
 3091 County Center Drive Auburn, CA 95603

SUBJECT: Village Inn Owners Association Comments on Draft Environmental Report for Village at Squaw Valley Specific Plan (VSVSP)

Dear Ms. Krach,

The following comments concerning the above referenced Draft Environmental Report (DEIR) for the Village at Squaw Valley Specific Plan (VSVSP) were authorized by the Village Inn Owners Association (VIOA) Board of Directors (BOD), the governing body for the Olympic Village Inn (OVI), on June 27, 2015.

- Adverse effect on a scenic vista (construction and operations as experienced by long-term residents)

VIOA COMMENT: The DEIR is inadequate in its evaluation of the scenic impact on OVI due to the limited visual analysis conducted from OVI's property. Only one view was included in the DEIR. The VIOA BOD recommends that the DEIR be amended to identify the effect on OVI of the proposed project's development south and west of OVI; and east from Building B (wing of OVI that trends southwest from central registration); and the visual effect of the entrance to the Mountain Maintenance proposed facility (as this entrance also is an entrance to OVI).

Analysis

The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet and visual ambience that OVI currently enjoys. Many owners and guests of OVI have expressed their concern about the potential visual and noise impact of proposed development surrounding OVI. The current visual ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The VIOA BOD recognizes that as the project develops, visual impacts will occur, but the current DEIR does not provide an adequate analysis for the BOD to use when reviewing new, specific development adjacent to OVI.

- Substantially degrade the existing visual character or quality of the site and its surroundings (construction)

VIOA COMMENT: The DEIR is inadequate in its evaluation of the scenic impact on OVI due to the limited visual analysis conducted from OVI's property. Only one view was included in the DEIR. The VIOA BOD recommends that the DEIR be amended to identify the effect on OVI of the proposed project's development south

015-1

015-2

Village Inn Owners' Association
 Post Office Box 2395
 Olympic Valley, CA 96146
 (530) 581-6000

and west of OVI; and east from Building B (wing of OVI that trends southwest from central registration); and the visual effect of the entrance to the Mountain Maintenance proposed facility (as this entrance also is an entrance to OVI).

In addition, the VIOA BOD requests that the opportunity through the Placer County Design/Site Review Committee (D/SRC) process to evaluate compliance with the design standards adopted in the specific plan be included in any approval of the Specific Plan.

Analysis

The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet and visual ambience that OVI currently enjoys. Many owners and guests of OVI have expressed their concern about the potential visual and noise impact of proposed development surrounding OVI. The current visual ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The VIOA BOD recognizes that as the project develops, visual impacts will occur, but the current DEIR does not provide an adequate analysis for the BOD to use when reviewing new, specific development adjacent to OVI. Once the DEIR is amended to address the issue described in this analysis, the retention of the compliance process will provide the vehicle for the VIOA BOD to comment on specific issues.

015-2
cont.

- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (operations)

VIOA COMMENT: The DEIR is inadequate in its evaluation of the effect of light sources from adjacent development on OVI due to the lack of any analysis. The VIOA BOD recommends that the DEIR be amended to identify the effect of light sources from the proposed project’s development east, south and west of OVI.

Analysis

New light sources have the potential of brightening the area around the OVI buildings. The DEIR could have done a photo simulation of the effect of surrounding light sources as was done in the example for the core village. Notwithstanding the light standards in the specific plan (which are more aspirational than definitive), there will be an eventual degradation of the dark skies in the immediate area; it is just too difficult to quantify what that might be without a more specific analysis as requested in the comment. As with visual impacts, the continued enjoyment of OVI by its owners and guests is dependent in large part on the night sky ambience that OVI currently enjoys. This ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort.

015-3

- Impacts to Placer County intersections (Transportation and Circulation)

VIOA COMMENT: The VIOA BOD has considerable concerns about the effect on its owners and guests of being able to timely access and depart from OVI during Sundays when check-in and check-out at the resort occurs. The VIOA BOD would strongly urge that alternatives to using Squaw Valley Road be incorporated into the Specific Plan.

015-4

Analysis

OVI will be affected by increased auto traffic as the project builds out and the VIOA BOD endorses the inclusion of alternatives to using Squaw Valley Road during peak times. Some alternatives that should be considered are expanded TART schedules, remote parking lots with shuttles to the projects lodging facilities, and staggered employee schedules.

- Construction noise impacts

VIOA COMMENT: For an area whose economy relies on tourism, the noise periods permitted for construction activity by county ordinance are inappropriate. The VIOA BOD recommends that the weekday period for construction commence at 8:00 a.m. and end at 6:00 p.m.; and that Saturday construction commence at 9:00 a.m. to 6:00 p.m. on and no construction be permitted on Sunday. The VIOA BOD further endorses the proposed construction noise mitigation measures identified in the DEIR, especially the notification of affected properties. The VIOA BOD further recommends that notification of the use of helicopters for construction activity be required at least one week prior to the date(s) of helicopter activity.

015-5

Analysis

The DEIR specifically identifies OVI as one of the developed properties that could be affected by construction noise. Placer County exempts from its maximum noise levels daytime construction activity (6:00 a.m. to 8:00 p.m., Monday through Friday, and between 8:00 a.m. and 8:00 p.m. Saturday and Sunday). The DEIR also anticipates some night-time construction activity when necessitated by construction practices, i.e. concrete pours for building foundations. Although these standard noise mitigation measures may be appropriate for non-tourist areas, they are inappropriate for areas such as Squaw Valley that rely on tourism for its economy. The location of OVI lends itself to excessive noise intrusion as it backs up against steep hills that will reflect noise onto OVI. The hours that construction and the attendant noise are permitted should be scaled back as recommended in the VIOA BOD comments so that the ambience that is so important to the economic health of OVI is not unduly affected. Notification of affected properties is required by the proposed noise mitigation measures which will assist OVI reservation staff in identifying to owners and guests when construction noise might be occurring. The VIOA BOD is especially concerned about the attendant noise emanating from helicopters used for construction activity as that noise can be very onerous.

- Substantial adverse cumulative effect on a scenic vista

VIOA COMMENT: The DEIR is inadequate in its evaluation of the scenic impact on OVI due to the limited visual analysis conducted from OVI’s property. Only one view was included in the DEIR. The VIOA BOD recommends that the DEIR be amended to identify the effect on OVI of the proposed project’s development south and west of OVI; and east from Building B (wing of OVI that trends southwest from central registration); and the visual effect of the entrance to the Mountain Maintenance proposed facility (as this entrance also is an entrance to OVI).

Analysis

The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet and visual ambience that OVI currently enjoys. Many owners and guests of OVI have expressed their concern about the potential visual and noise impact of proposed development surrounding OVI. The current ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The VIOA BOD recognizes that as the project develops, visual impacts will occur, but the current DEIR does not provide an adequate analysis for the BOD to use when reviewing new, specific development adjacent to OVI.

- Contribute to cumulative light and glare or skyglow effects in the region

VIOA COMMENT: The DEIR is inadequate in its evaluation of the effect of light sources from adjacent development on OVI due to the lack of any analysis. The VIOA BOD recommends that the DEIR be amended to identify the effect of light sources from the proposed project’s development east, south and west of OVI.

Analysis

New light sources have the potential of brightening the area around the OVI buildings. The DEIR could have done a photo simulation of the effect of surrounding light sources as was done in the example for the core village. Notwithstanding the light standards in the specific plan (which are more aspirational than definitive), there will be an eventual degradation of the dark skies in the immediate area; it is just too difficult to quantify what that might be without a more specific analysis as requested in the comment. As with visual impacts, the continued enjoyment of OVI by its owners and guests is dependent in large part on the night sky ambience that OVI currently enjoys. This ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort.

015-6

015-7

- Cumulative short-term construction-generated noise

VIOA COMMENT; For an area whose economy relies on tourism, the noise periods permitted by county ordinance are inappropriate. The VIOA BOD recommends that the weekday period for construction commence at 8:00 a.m. and end at 6:00 p.m.; and that Saturday construction commence at 9 a.m. to 6 p.m. on and no construction be permitted on Sunday. The VIOA BOD further endorses the proposed construction noise mitigation measures identified in the DEIR, especially the notification of affected properties. The VIOA BOD further recommends that notification of the use of helicopters for construction activity be required at least one week prior to the date(s) of helicopter activity. In addition, the VIOA BOD endorses the proposed construction noise mitigation measures identified in the DEIR, especially the notification of affected properties.

Analysis

The DEIR specifically identifies OVI as one of the developed properties that could be affected by construction noise. Placer County exempts from its maximum noise levels daytime construction activity (6:00 a.m. to 8:00 p.m., Monday through Friday, and between 8:00 a.m. and 8:00 p.m. Saturday and Sunday). The DEIR also anticipates some night-time construction activity when necessitated by construction practices, i.e. concrete pours for building foundations. Although these standard noise mitigation measures may be appropriate for non-tourist areas, they are inappropriate for areas such as Squaw Valley that rely on tourism for its economy. The hours that construction and the attendant noise are permitted should be scaled back as recommended in the VIOA BOD comments so that the ambience that is so important to the economic health of OVI is not unduly affected. Notification of affected properties is required by the proposed noise mitigation measures which will assist OVI reservation staff in identifying to owners and guests when construction noise might be occurring. The VIOA BOD is especially concerned about the attendant noise emanating from helicopters used for construction activity as that noise can be very onerous.

015-8

- Tree Removal (Biological Resources)

VIOA COMMENT; The VIOA BOD endorses the requirement of a conditional use permit and tree removal permit for development of Lot 18 as this will provide the VIOA BOD with the opportunity to evaluate the effect on OVI of development on this parcel.

Analysis

The Draft DEIR identifies the change in land use on Lot 18 from Forest Reserve (FR) to Village Commercial (VC) as having a significant biological impact on Lot 18: the development directly west of OVI. The development of the property as fractional ownership units will necessitate the removal of trees. Because the site plan is conceptual, it is difficult to determine the amount and location of the trees to be harvested and the effect on water quality, air quality, storm drainage and visual on OVI. Mitigation measures in Placer County code do require a tree removal permit to be obtained prior to

015-9

construction. This would be in addition to the conditional use permit currently also required as a process in the specific plan.

015-9
cont.

□ Tree Removal (parcels south of OVI) (Biological Resources)

VIOA COMMENT: 1) The DEIR is inadequate in its evaluation of the scenic impact from OVI due to the limited visual analysis conducted from OVI’s property. The VIOA BOD recommends that the DEIR be amended to identify the effect of the proposed project’s development south and west of OVI. 2) The DEIR is inadequate in its evaluation of the effect of light sources from adjacent development on OVI due to the lack of any analysis. The VIOA BOD recommends that the DEIR be amended to identify the effect of light sources from the proposed project’s development east, south and west of OVI. 3) The VIOA BOD recommends that a mitigation be required in the final EIR that obligates Squaw Valley Real Estate (SVRE) and the VIOA BOD to reach a mutual understanding regarding the tree easement that covers the existing trees located south and east of the OVI property. 4) The VIOA BOD endorses the requirement of a conditional use permit and tree removal permit for development of Lots 14, 15 and 18 as this will provide the VIOA BOD the opportunity to evaluate the effect of development on these parcels.

015-10

Analysis

Though the biological resources portion of the DEIR does not call out the removal of trees south and east of OVI as a significant impact; the issue of resolving the definition of a tree easement that is part of a draft memorandum of understanding (MOU) between the VIOA BOD and SVRE is still outstanding. How the definition of the number, location and types of trees allowed to be removed under the tree easement is critical to the level of noise and visual impact OVI will experience during and after construction of the property south of OVI.

□ Construction vibration impacts (Noise)

VIOA COMMENT: The VIOA BOD recommends that the time frame allowed for pile driving activity be amended to only allow such activity between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday and prohibited on Saturday and Sunday for activities adjacent to OVI.

Analysis

The DEIR identifies pile driving activity as a potentially significant effect on nearby developed property. It is likely that OVI is going to experience pile driving vibrations for the development proposed adjacent to OVI. The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet ambience that OVI currently enjoys. This ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The proposed DEIR mitigation measures appear to be adequate except for the time frames that are proposed for pile driving activities; these seem to be overly generous.

015-11

- Exposure of new sensitive receptors to existing and new stationary noise sources.

VIOA COMMENT: The VIOA BOD endorses the mitigation measures associated with the impact of “Exposure of new sensitive receptors to existing and new stationary noise sources”.

Analysis

The DEIR identifies new noise sources from the project on existing development. The effect on OVI could be significant, especially from the proposed hotel to the east of OVI. The mitigation measures proposed in the DEIR focus on the noise levels allowed during the operation of the new development (much like the quiet hours that OVI requests of its guests and owners) and the need to obtain special permits for events. These mitigation measures should be adequate to result in good neighbors to OVI.

015-12

- Sequencing of Development of the Project

VIOA COMMENT: The VIO BOD requests that a preliminary sequencing of development of the specific plan be included in the final EIR.

Analysis

The VIOA BOD recognizes that the build-out of the project is dependent on market conditions and therefore the specific plan only identifies a potential 25 year build-out period. This lack of identifying the location of development within this 25 year period makes it extremely difficult for existing development to plan for mitigation measures and notice to owners and guests of possible construction activity. A preliminary schedule that could be amended would greatly assist resorts such as OVI plan for the development of the specific plan. A preliminary schedule would also assist in the marketing of the resort.

015-13

The VIOA BOD appreciates the opportunity to comment on the DEIR for the VSVSP. Should you have questions concerning our comments, please direct them to Michael Harper, FAICP, VIOA Board Member, at 775-825-1422 or retcoplnr09@hotmail.com.

Comments prepared by Michael A. Harper, FAICP from input provided by the Village Inn Owners Association Board of Directors.

Approved by the Village Inn Owners Association Board of Directors.

ALAN TRAENKNER

Alan Traenkner, President, Board of Directors
Village Inn Owners Association

XC: Members, VIOA BOD; Mark Zimmerman, VIOA Resort Manager

015

Village Inn Owners Association
Alan Traenkner, President, Board of Directors
July 13, 2015

015-1 Comment 015-2 repeats all the text of comment 015-1, but also provides two additional sentences not found in Comment 015-1. The content of comment 015-1 is addressed in the response to comment 015-2.

015-2 The DEIR includes 12 visual simulations from nine different viewpoints, with simulations provided at some viewpoints for both winter and summer conditions, or day and night conditions. As indicated by the commenter, one of the simulated viewpoints is from the Olympic Village Inn (OVI) (Viewpoint #11 in the DEIR, shown as Exhibit 8-19). There is sufficient information in the DEIR, including the simulations, to support a thorough analysis of visual resources impacts. Adding further simulations specific to views from OVI, although of interest to the commenter, would not alter the analysis or conclusions in the DEIR as a simulation from an OVI viewpoint is already provided, and the DEIR characterizes the visual resources impacts for the entirety of the project, which would include views beyond those shown in the simulations. The visual simulations are a tool to both assist with the EIR impact analysis and to provide the EIR reader an indication of post project conditions. However, there are no requirements in CEQA that visual simulations be generated for a project, and legally adequate assessments of visual resources impacts can be completed without development of visual simulations. There is not a need to further supplement the VSVSP EIRs impact analysis with further simulations, particularly given the plan level nature of the proposed project and that the EIR is a program EIR, with further review by the County required as project implementation proceeds. Also see response to comment 09-59 regarding the issue of a program EIR. The commenter and others will have opportunities to continue to provide input to Placer County as specific development proposals move forward that implement the VSVSP.

Although the DEIR is adequate without further simulations, the County is aware that the applicant, through separate coordination with OVI, has provided four additional visual simulations. The County and the EIR consultant have reviewed these simulations and conclude that they do not alter the analyses or conclusions provided in the DEIR. These simulations are available from the County upon request using contact information provided on the County website (http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/villageat_squawvalley).

Regarding the Design/Site Review Committee (D/SRC) process, see the Master Response regarding the visual impact analysis. Obtaining Design Review approval from the D/SRC is required as part of Mitigation Measure 8-2b.

Also see Section 2.1, "Project Modifications," of this FEIR. As noted there, the applicant has proposed a reduction in the maximum height of Building 15, located southeast of OVI, from 96 feet to 84 feet, and a portion of the southwest wing would have the maximum height reduced to 66 feet.

The comment briefly mentions noise as an issue, but does not address the content, analysis, or conclusions in the DEIR on this topic. Therefore, a response related to noise is not provided here.

This comment, and subsequent comments, references the financial health of OVI. Financial issues such as these are not an environmental effect under CEQA and need not be included in an EIR or other CEQA analysis.

- 015-3 See the Master Response regarding the visual impact analysis. See response to comment 015-2 regarding the topic of additional visual simulations.
- 015-4 The comment states that alternatives to using Squaw Valley Road during peak times should be considered, including expanded TART schedules, remote parking lots with shuttles to the project's lodging facilities, and staggered employee schedules. See the Master Response regarding traffic for discussion of the first two suggestions. Employee schedules are already staggered in various ways; for example, retail outlets have different opening times and shift schedules from ski operations, which have different shift schedules from lodging housekeeping. Restaurant operations continue after ski operations close, and some lodging operations require 24-hour staffing. Although there are daily peak periods of employee activity related to ski operations opening, the nature of a ski resort with multiple services generates staggered schedules for many employees.
- 015-5 With regards to construction hours, see the Master Response regarding noise. With regards to helicopter noise during construction, no helicopter use is proposed for construction activities. A helipad is being constructed for emergency access. See Chapter 3, "Project Description," for an explanation of the helipad and helicopter use.
- 015-6 See response to comment 015-2.
- 015-7 See the Master Response regarding the visual impact analysis. See response to comment 015-2 regarding the topic of additional visual simulations.
- 015-8 See response to comment 015-5.
- 015-9 Mitigation Measure 6-9 in the DEIR (see pages 6-71 through 6-74) requires the project applicant to obtain a permit from Placer County for tree removal, as per the County's Tree Ordinance. In addition, each phase of project construction would require approval of a Small Lot Subdivision Map(s) and Conditional Use Permit(s).
- 015-10 The comment provides a summary of detailed comments provided above concerning the visual impact analysis, lighting, and the need for a tree permit. See responses to the detailed comments above.

The comment also states that a mitigation measure should be added to the EIR that obligates Squaw Valley Real Estate, LLC and the Village Inn Owners Association Board of Directors (BOD) to reach a mutual understanding regarding the tree easement that covers the existing trees located south and east of the OVI property. The County is aware that Squaw Valley Real Estate, LLC and the Village Inn Owners Association BOD have been in negotiations regarding a Memorandum of Understanding (MOU) covering various topics (e.g., Chamonix Place realignment, parking easements, access, signage), including the protection/removal/replacement of trees on a property south and east of OVI where a specific "Declaration of Covenants, Conditions, and Restrictions" (CCRs) has been recorded. Completion of this MOU (which was signed by both parties on December 18, 2015) and settlement of issues related to the CCR property are real estate and business issues between Squaw Valley Real Estate, LLC and the Village Inn Owners Association BOD and are outside the scope of the EIR unless they would obligate the project to undertake activities that could result in significant impacts not addressed in the EIR. The CCR property is within the project site for the VSVSP and removal of trees on this property have been incorporated into the impact analysis consistent with the methods and assumptions identified in the DEIR. As

indicated on page 6-74, removal of trees is considered a less than significant impact after implementation of Mitigation Measure 6-9. No further mitigation is required. Squaw Valley Real Estate, LLC and the Village Inn Owners Association BOD have come to an agreement (via the signed MOU) that is more protective of trees than identified in Mitigation Measure 6-9, such that environmental effects would be less than what is identified in the DEIR, and the agreement would not be in conflict with the EIR requirements. Squaw Valley Real Estate, LLC will preserve all trees outside of the development footprint.

- 015-11 The comment suggests that allowable hours for pile driving be restricted further than those identified in Mitigation Measure 11-2a (DEIR page 11-23). This mitigation measure requires that pile driving only occur during the hours that Placer County provides an exemption from construction noise; between 6:00 a.m. and 8:00 p.m. Monday through Friday and between 8:00 a.m. and 8:00 p.m. Saturday and Sunday. As described on page 11-24 of the DEIR, these timing restrictions would “ensure that pile driving would not occur during the more sensitive times of day (i.e., late evening through early morning).” Coupled with Mitigation Measure 11-2b, which addresses vibration potentially generated by pile driving, the DEIR concludes that the impact is reduced to a less-than-significant level. The comment provides no evidence countering this conclusion. Therefore, no changes to Mitigation Measures 11-2a and 11-2b are proposed. Also see the discussion of construction noise in the Master Response regarding noise.
- 015-12 The comment agrees with proposed mitigation for operational noise sources. No comment is made regarding the adequacy of the DEIR. No further response is necessary.
- 015-13 See the Master Response regarding the 25-year construction period. A more detailed project construction schedule is not known at this time, and, therefore, is not included in this FEIR. Also see response to comment 09-59 regarding program EIRs.

This page intentionally left blank.