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Friends of Squaw Valley
PO Box 2823
Olympic Valley, CA 96146
friendsofsv@gmail.com

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Placer County Planning Commission
c/o Maywan Krach
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive #190
Auburn, CA 95603

Via email: cdraecs@placer.ca.gov

Re: Village at Squaw Valley Specific Plan Draft EIR Comments

Dear Commissioners:

Thank you for the opportunity to comment on the Village at Squaw Valley Specific Plan (Specific Plan) Draft Environmental Impact Report (DEIR), on behalf of Friends of Squaw Valley (FoSV). Friends of Squaw Valley is a group of Squaw Valley residents, skiers, snow boarders, and business persons who are concerned about the future of Squaw Valley. We were formed in response to the proposed project. Our mission is to advocate for environmental sustainability, economic viability, and development that is aesthetically compatible with our community's character.

In general, the DEIR points to a project which will result in substantial impacts, will change the environment of Squaw Valley as we know it, and which is inconsistent with the Placer County General Plan and the Squaw Valley General Plan. We believe that the project should be substantially reduced in size to avoid this outcome.

In our comments, we recommend numerous changes to conclusions in the DEIR as well as additional mitigation measures and a more environmentally sound alternative. Without these revisions, we do not believe the DEIR is legally adequate.

We oppose the proposed Specific Plan in its present form, and ask that the County evaluate the two substantially reduced density alternatives with additional mitigating design features described in our comments with the intent of eventually identifying a smaller, better, environmentally sound project for Squaw Valley.

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CEQA issues which apply to all impact subjects

A number of issues relative to complying with the California Environmental Quality Act (CEQA) apply to many of our comments:

1. **All available feasible mitigation is not explored in the DEIR.**

Many of our comments refer to potential mitigation measures which were not explored in the DEIR. An EIR must explore all feasible mitigation measures even if they are not selected:

> *Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified…..* (CEQA Guidelines § 15126.4 (a) (B))

In some cases, the DEIR "drops the ball" and concludes that an impact is unavoidable when, in fact, mitigation measures may be available. In other cases, minimal mitigation is selected when more effective mitigation may be available. As a result, we recommend additional feasible mitigation measures throughout our comments.

2. **The DEIR often defers formulation of mitigation measures to the future.**

We raise this issue in specific instances throughout our comments. CEQA does not permit deferral of mitigation until a future date unless very specific performance standards are included (generally, standards against which success of implementation can be measured): O2-2

> …Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. (CEQA Guidelines Section 15126.4 (a) (B))

3. **Effectiveness of mitigation measures is not always adequately demonstrated.**

In many cases, the DEIR selects the lowest possible level of mitigation. We point this out in specific cases throughout our comments. CEQA's intent is that the EIR provide substantial evidence demonstrating that the recommended mitigation measures are capable of:

> *(a) Avoiding the impact altogether by not taking a certain action or parts of an action.*
> *(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.*
> *(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.*
> *(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.*
> *(e) Compensating for the impact by replacing or providing substitute resources or environments* (CEQA Guidelines Section 15370

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Our specific comment follow organized by impact issue.

Land Use

1. **The project is inconsistent with the Placer County General Plan and SVGPLUO.**

Throughout the DEIR, General Plan policies are listed which are relevant to each impact area. These policies should be considered impact evaluation criteria and if the project is inconsistent with any that were adopted for the purpose of avoiding or mitigating an environmental effect, a significant land use impact will result. It is the job of the Planning Commission and Board of Supervisors to determine if the consultant has evaluated the consistency of the project with the policies. Policies are open to some interpretation; the Planning Commissioners are generally considered experts in the interpretation of the County's adopted land use and environmental policies.

In the case of countywide General Plan consistency, there is one critical policy that was listed as a relevant policy (DEIR p.4-16) but not evaluated specifically against the project in the impact discussion (DEIR p. 4-21 to 4-25):

> Policy 1.G.1 of the Placer County General Plan as cited in the DEIR (p. 4-16) reads: ***"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 <u>where environmental impacts can be adequately mitigated</u>."*** (Emphasis added,)

O2-3

The DEIR concludes that there will be numerous unavoidable environmental impacts resulting from the project. A project with unavoidable environmental impacts is inconsistent with this important land use policy. Because of the broad reaching nature of this policy, the DEIR statement that *"land use policies for the plan area are <u>predominately consistent</u> with the existing Placer County General Plan and SVGPLUO policies…."* (DEIR p. 4-12, para. 5, emphasis added) is incorrect. Again, this policy is not even evaluated relative to Impact 4.2 in the DEIR. As a result, we ask the Planning Commission or the DEIR authors to direct revision of Impact 4-2 (Conflict with the County General Plan) to a conclusion of significant and unavoidable because of the numerous significant, unavoidable environmental impacts identified in the DEIR including:

a. **Traffic impacts are projected to be significant and unavoidable if the project is approved, making the project inconsistent with General Plan Policy 1.G.1 and a significant land use impact.**

   Development of the Specific Plan project will result in significant, unavoidable impacts to Placer County intersections within the Plan area according to the DEIR (Impact 9-2). It should be noted that the Specific Plan (if adopted) reduces these project traffic

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impacts within the Plan area to below the significant level only by decreasing the acceptable Level of Service (LOS) to F. The project will also result in significant, unavoidable impacts outside of the Plan area at Caltrans intersections (SR 89/Squaw Valley Rd.) and to four Highway 89 road segments (Impacts 9-4 and 9-5).

In addition, the project will contribute substantially to cumulative, significant unavoidable traffic impacts outside the Plan area (89/80 WB and EB ramps, 80/Donner Pass Rd. and the entire stretch of SR 89 between Deerfield Dr. and Squaw Valley Rd. and SR 28 east of SR 89 in Tahoe City). Policy 1.G.1 does appear to apply to cumulative impacts (in addition to project alone impacts) as it gives a nod to ski area expansion "*where circulation and transportation system capacity can accommodate such expansions…*" The circulation system that serves Squaw Valley is regional, certainly to this portion of the Tahoe Basin and Truckee. We should note that though the project includes housing, it is clearly overall a "ski area" expansion.

b. Numerous other environmental impacts are projected to be significant and unavoidable if the project is approved, also making the project inconsistent with General Plan Policy 1.G.1, and a significant land use impact, as a result. O2-3 cont.

Project Unavoidable Impacts
- Cultural/historical resources
- Scenic and visual resources
- Light and glare
- Noise
- Greenhouse gases
- Transportation and circulation

Cumulative Unavoidable Impacts
- Cultural/historical resources
- Scenic and visual resources
- Light and glare
- Noise
- Greenhouse gas emissions
- Transportation and circulation

c. In addition to Placer County General Plan Policy 1.G.1, the project (if approved) would be inconsistent with a number of other General Plan and SVGPLUO goals, policies, and guidelines, some of which are not evaluated in the DEIR.

A number of land use related General Plan policies are listed in the DEIR as relevant to the project (DEIR pages 4-15 to 4-18). Project inconsistency with these polices could result in potentially significant impacts based on Impact Evaluation Criteria bullet 2 in the DEIR ("*conflict with Placer County General Plan or SVGPLUO designation or zoning, or plan policies adopted for the purpose of mitigating an environmental effect*" – DEIR p.4-18). Yet, the DEIR concludes that "*this analysis assumes that the project would comply with…..relevant Placer County General Plan and SVGPLUO objectives presented above*" O2-4

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(DEIR p. 4-19, para.3) without any analysis of many of the listed policies. In addition, other sections of the DEIR include lists of relevant General Plan and SVGPLUO policies, yet they are generally not discussed and in many cases the project may be considered inconsistent with them. (FoSV did request a policy by policy analysis in in our NOP comments.) We believe that the project, if approved, would be inconsistent with the General Plan policies listed below as well as others outlined in other sections of the DEIR: O2-4 cont.

Project Inconsistency with General Plan and SVGPLUO Policies

Relevant Placer County General Plan land use and related policies	Project Inconsistency with Policy	
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.	Discussed above under 1a relative to traffic. 1B above lists unavoidable impacts of the project which can be considered, therefore "not adequately mitigated" per this policy.	O2-5
Policy 1.A.4. The County shall promote patterns of development that facilitate the efficient and timely provision of urban infrastructure and services.	As we discuss in the Public Facilities/Services section of this letter, we believe that the project should include more detailed public facility/service master plan and a detailed financing plan in order to be consistent with State Specific Plan law. Without these plans, and a detailed phasing plan, the project is inconsistent with this policy. The Master Phasing Plan does not require phasing.	O2-6
Policy 1.D.2. The County shall require new commercial development to be designed to minimize the visual impact of parking areas from public roadways and existing residential uses.	As we discuss in the Visual section of this letter, the visual impact of parking structures from viewers along Squaw Valley Road will be significant and potentially unavoidable.	O2-7
Policy 1.D.5. The County shall encourage existing and new downtowns/village centers to provide a variety of goods and services, both public and private.	There is no requirement in the Specific Plan for a balance of land use types to be provided in each building phase (such as commercial, residential, hotel, recreation), thus it is not assured that a mix of land uses will result for many years or at all.	O2-8
Policy 4.A.2 (Adequate public facilities and services to be provided)	DEIR p. 4-23 para 1 maintains that the project is consistent with this policy. We disagree, the Specific Plan policies cited are not	O2-9

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	specific and detailed public facility/service master plans and financing plans have not been prepared.	O2-9 cont.
Policies 1.A.1 and 1.A.2 (efficient use of land and natural resources and low intensity development in areas with sensitive environmental resources)	DEIR p. 4-23 para. 2 maintains that the project is consistent with this policy. We disagree. In particular, the fractional cabin area is one of the last undisturbed areas in the Plan area and is a critical groundwater recharge area.	O2-10
Relevant SVGPLUO land use guidelines and development goals discussed in Land Use chapter of DEIR		
(1)Both the quality and quantity of development must be planned to conserve, protect, and enhance the aesthetic, ecological, and environmental assets of Squaw Valley.	The project is inconsistent with this policy since the DEIR concludes that numerous unavoidable impacts will result from the project.	O2-11
2) Future development in Squaw Valley should occur only where public facilities and services, including transportation, can be efficiently provided.	See discussion under County General Plan Policy 1.A.4 above.	O2-12
4) Decisions regarding future development should be based upon sound social, economic, and environmental practices.	The lack of a requirement for a balance of land uses in each pahse as the project builds out is counter to this policy.	O2-13
5) In planning for the future growth and development of Squaw Valley, an optimum balance of activities and facilities, which recognizes the strengths, weaknesses, and inter-relationships of various segments of the Truckee-Squaw Valley and Tahoe area economies should be encouraged.	The inter relationships with the Tahoe area economy has not been discussed in the DEIR.	O2-14
Encourage a concentration of commercial activity (including hotels) in the core area (cited on DEIR p. 4-17)	The core area does not include a phasing plan that will ensure that housing and commercial activity will be constructed together to ensure a mix of uses throughout the 25 year buildout period.	O2-15

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Provide a mix of housing types for all segments of the population to contribute to a dynamic year-round community (cited on DEIR p. 4-17)	Housing affordable to moderate income households has not been provided in the project.	O2-16
SVGPLUO parking goals	DEIR p. 4-22 para. 4-6 conclude that SVGPLUO parking goals are met by the project. We do not agree. See discussion in Traffic section of this letter.	O2-17
Development densities permitted in the SVGPLUO	The DEIR on page 4-22, para. 2-3 concludes that the project will be consistent with densities permitted in the SVGPLUO. We disagree. The SVGPLUO policies, land use map and zoning are directed by the intent in the text of the SVGPLUO. Overall, the Squaw Valley General Plan text recognizes that a vibrant Village will require additional visitors lured by new accommodations and summer recreation activities and establishes maximum densities for various land uses. Yet, it notes that "*At the same time, the quality of the permanent residential community must not be adversely affected by the detrimental effects of short term, high intensity use by a transient, seasonal population.*" (SVGP Page 5, para 3) and that: "*…it is apparent that rational limits must be placed on the development of Squaw Valley. In an ecologically sensitive area such as Squaw Valley, development beyond a certain capacity will damage the recreational and living experience of current and future users. A potential conflict exists between permanent residents, enjoying their community, and land owners profiting from a greater amount of tourist dollars flowing into the area. The construction of additional tourist related recreational development, though it may bring economic gains to many, can result in a diminished ability for the local residents and visitors to enjoy the area.*" (SVGP Page 7, paras 1 and 2) We believe that the DEIR findings of numerous unavoidable environmental impacts of the project results in an inconsistency with these goals.	O2-18

To summarize, consistency with Placer County General Plan and SVGPLUO policies cannot be based on a conclusion of "*predominately consistent*" (DEIR p.4-21, para.5). Any individual policy which the project is found to be inconsistent with results in a potentially significant environmental impact based on the impact evaluation criteria. Each of the Placer County General Plan and SVGPLUO policies relevant to the project should be discussed individually in the DEIR and if found to be inconsistent with the project this should result in further rationale for conclusions of significant impacts. O2-19

We ask the Planning Commission and the consultants, based on the discussion above, to conclude that significant unavoidable land use impacts related to inconsistency with

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adopted plans and regulations would result if the project is approved and to revise the DEIR accordingly. O2-19 cont.

2. The DEIR does not adequately discuss impacts to the Lake Tahoe Basin.

We agree with the DEIR comments of Friends of the West Shore on this subject and incorporate them by reference. The fact that inconsistencies with regional land use plans for the Lake Tahoe Basin are not discussed in the DEIR as required by CEQA (Section 15125 (d)) is a serious flaw. Basin wide, the following impacts due to the project and its increase in Basin visitation need to be evaluated: air quality, recreational resources including capacity and user experience, VMT and traffic, and employee housing outside Squaw Valley. All impacts to Tahoe Regional Planning Agency (TRPA) standards and other adopted regional plans also need to be analyzed. O2-20

3. The proposed location of the maintenance yard would result in significant land use conflict and zoning inconsistency impacts.

This area, near the base of Shirley Canyon, a popular hiking destination, is proposed for rezoning from Forest-Recreation to Heavy Commercial. The industrial use characteristics of the maintenance yard are not consistent with Shirley Canyon or nearby proposed residential areas. This impact must be recharacterized as significant and the use should be relocated to avoid impacts. O2-21

4. East Parcel planned uses will result in land use compatibility impacts with existing residential areas.

We incorporate by reference the impact discussion in the comment letter on this subject submitted by Andrew Lange. To summarize, the use characteristics of the East Parcel proposals that are not normally considered consistent with residential uses include: a two level parking structure, a grocery store in close proximity, and a major shipping and receiving facility for the developer's operations. Noise, light pollution, and shadowing from new buildings are all potential impacts that combined result in land use incompatibility and have not been adequately mitigated in the Specific Plan or the DEIR.

We recommend that the following mitigation measures be considered: O2-22

- Relocation of the employee housing to the west end of Squaw Valley, made possible by the FoSV recommendation that project densities be substantially reduced.
- Design shipping and receiving area so that delivery trucks do not have to back up to eliminate warning "beep" noise. Alternately, enclose the area to muffle back up noise.
- Consider locating fractional cabins and other visitor housing at the East Parcel thus making room for the employee housing, parking, grocery store and shipping and

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receiving station at the west end of Squaw Valley, though outside of the critical well field recharge area.

- Requirement of an effective landscaping buffer along west, north, and east sides of the East Parcel to be installed immediately upon approval of the Specific Plan.

O2-22 cont.

Traffic

1. **Revision of County LOS standards to artificially reduce reported traffic impacts below the significant level is inappropriate.**

The developers have proposed a new, lowered LOS F traffic standard. We maintain that LOS F is not an appropriate traffic level for our community. Using this reduction in standard to claim impact reduction to below the significant level and to avoid County adopted standards would negatively affect the overall quality of life, recreational experience, and safety of residents and visitors which they were intended to protect. Use of the lowered standard is at the discretion of the Board of Supervisors and Planning Commission and should be rejected.

O2-23

2. **Potential project and cumulative (9-1 and 18-19) impacts to Squaw Valley Rd. between Squaw Creek Rd. and the Village area have not been mitigated.**

The Transportation System Management (TSM) mitigation measures recommended by the DEIR to meet existing LOS county roadway segment standards on Squaw Valley Rd. are fatally flawed. They are unrealistic and their effectiveness is not assured:

- Details will be set forth in an as yet unprepared Transportation Management Plan, (dictating a third lane creation with cones, traffic control personnel, etc.).

- In order to achieve a currently acceptable LOS-v/c after project in this section of Squaw Valley Rd assumptions were made about how much capacity increase the temporary third lane <u>might</u> result in. 25% additional lane capacity is used which would keep the theoretical LOS to the existing condition of D. However, the volume to capacity increase is determined to be <u>just under</u> the .05 increase permitted. Given all the assumptions needed to end up with this calculation, the hair width difference between significant and less than significant impacts resulting from the project traffic is questionable.

- The current triple lane arrangement has proven to be poorly handled and ineffective much of the time according to our local members. Residents directly on Squaw Valley Rd. are particularly impacted since they are not assisted by the presence of an intersection or traffic controllers. To continue using cones to convert from two lanes to three has been proven ineffective.

O2-24

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It is extremely dangerous, especially in bad weather, and has been poorly staffed for the past 4 -5 years. It has not provided adequate LOS mitigation to date.

For these reasons, project impacts to these road segments will be significant and unavoidable.

Significant cumulative impacts to these roadway segments will also result along Squaw Valley Rd. according to the DEIR. (DEIR Impact 18-18) For the same reasons, we maintain that the TSM programs proposed will not mitigate cumulative impacts in this location. O2-24 cont.

The DEIR should be revised to conclude that unavoidable project and cumulative impacts will occur to the Squaw Creek Rd to Village area segment of Squaw Valley Rd even with TSM mitigation measures 9-1a and b. A substantially reduced density alternative and enhanced Bay Area, Reno, Truckee/Tahoe region and and local transit services will be needed to reduce impacts accordingly and should be analyzed.

3. Significant project and cumulative impacts to intersections along Squaw Valley Rd. have not been mitigated (Impacts 9-2 and 18-20).

Three intersections will fall to LOS F (below adopted County LOS standard C) along Squaw Valley Rd. which are recommended to be mitigated by further TSM measures. For the same reasons listed under 2 above, we consider these proposed measures unrealistic and their effectiveness is not assured. As a result, impacts will be significant and unavoidable.

One intersection will fall below the target LOS at Village East Rd/ Squaw Valley Rd even with the proposed TSM mitigation. As a result, the developers have proposed a new LOS F standard to get around this problem. However, agreeing to this standard is up to the discretion of the Planning Commission and Board of Supervisors. We maintain that LOS F is not an appropriate traffic level for our community. Using this reduction in standard to claim impact reduction to below the significant level and to avoid adopted standards would negatively affect the overall quality of life, recreational experience, and safety of residents and visitors which they were intended to protect. O2-25

Significant cumulative impacts to intersections will also result along Squaw Valley Rd. according to the DEIR. For the same reasons, we maintain that the TSM programs proposed will not mitigate cumulative impacts and standards should not be increased to LOS F at Village East Rd.

We ask the Planning Commission and Board of Supervisors to reject use of the Specific Plan CP-1 LOS F standard as a mitigation measure. In addition, the FEIR should conclude that unavoidable project and cumulative impacts will occur to

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Squaw Valley Rd. intersections even with the DEIR recommended intersection TSM mitigation measures due to their ineffectiveness. A substantially reduced density alternative and enhanced Bay Area, Reno, Truckee/Tahoe region and local transit services will be needed to reduce impacts accordingly. O2-25 cont.

4. Impacts to Caltrans facilities demonstrate a clear need for a reduced density alternative.

The DEIR concludes that significant, unavoidable project impacts will occur on Caltrans intersections due to:

- Lengthy queuing at Highway 89 and Squaw Valley Road
- Traffic levels along Highway 89 between West River Street and Deerfield Dr.
- Traffic levels on SR 28 east of 89 in Tahoe City.

Significant, unavoidable cumulative impacts will occur on Caltrans intersections due to:

- Traffic levels at I 80/89 and SR 89/Donner Pass Rd.
- Lengthy queuing at Highway 89 and Squaw Valley Road
- Traffic levels along Highway 89 between West River Street and Deerfield Dr.
- Traffic levels on SR 28 east of 89 in Tahoe City.

O2-26

This underscores the impact that this project at the proposed density will have on the quality of life and recreational visitor experience in this entire portion of the Tahoe Basin from Truckee to Tahoe City. These will be urban levels of traffic congestion.

It should be noted that impacts to mainline I-80n were not evaluated. This should be rectified in the FEIR.

Because of these unavoidable project and cumulative traffic impacts to Caltrans facilities, a substantially reduced density alternative and enhanced Bay Area, Reno, Truckee/Tahoe region and local transit services will be needed to reduce impacts accordingly.

5. The DEIR substantially underestimates projected traffic volumes.

Traffic data from the 2011-2012 ski season was used in the DEIR to prepare project traffic projections. However, the following analysis demonstrated that the choice of this year results in a substantial underestimate of peak average winter traffic. (See DEIR comments from David Stepner on this issue for the full analysis.) O2-27

The winter of 2011-2012 was one of the driest in recent times. The day chosen for the peak hour was Saturday, February 18, 2012. Yet, on February 7, 2012 instead of the normal average 69" snowpack, there was a 12" snowpack. No snow fell between

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November 7 and January 22, reducing usual traffic during this normally heavy traffic period which includes Christmas and MLK weekend. It is clear that the DEIR traffic study is not representative of an average Squaw Valley winter.

In addition, the DEIR assertion that the heaviest traffic days in the Valley are infrequent is not accurate. In a good snow season, Squaw Valley would be at capacity on Thanksgiving, Christmas week, MLK weekend, Presidents' weekend, Spring break, and Easter weekend totaling as many as 30 days of high traffic. O2-27 cont.

The DEIR comment letter from Sierra Watch prepared by Shute, Mihaly, and Weinberger includes additional analysis of traffic generation underestimation and we incorporate the comments on this issue by reference.

The DEIR underestimated peak average traffic levels must be rectified in the FEIR and associated impacts such as noise, air quality, and greenhouse gas emissions should be reanalyzed.

6. The DEIR does not adequately address traffic impacts in the Tahoe Basin.

CEQA Guidelines Section 15125 requires that EIRs evaluate regional impacts with special emphasis on environmental resources which are unique to that region (such as Lake Tahoe) and specifically requires that any inconsistencies with regional plans in the Lake Tahoe Basin be discussed. The DEIR neglects a discussion of these impacts. We agree with the traffic discussion in the DEIR comment letter from Friends of the West Shore and incorporate them by reference in this letter. The DEIR should be revised to address their analysis. O2-28

7. The Specific Plan does not adequately provide for transit services. This impact and potential for mitigation is underestimated in the DEIR.

The DEIR concludes that a number of traffic impacts generated by the project will be significant and unavoidable. FoSV has also identified additional unavoidable traffic impacts based on the fact that proposed mitigation is inadequate and traffic projections may be underestimated. The primary solution appears to be a substantial reduction in density. Additionally, the scale of the project (even reduced in size) requires a new approach to transportation management in order to most effectively and thoroughly address traffic, air quality, global warming, and noise impacts. O2-29

While the project claims to be pedestrian oriented, in reality almost all guests and employees would arrive by car and park in large structured facilities, yet the mitigation measures proposed would not reduce trip generation, rather they would accommodate the increased traffic largely by adding roadway or facility capacity.

Provision of transit facilities receives minimal attention in the Specific Plan and should be evaluated in greater depth in order to explore all feasible measures. A list of transit services in concept to be provided is included (Specific Plan p. 5-29) for in-Valley and Tahoe/Truckee travel. However, the specific details and financial commitment to each

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are not provided. A projected ridership goal for each is not included, necessary in order to monitor success and to determine actual potential to reduce trip/vehicle miles travelled. And many of the proposals are couched in terms such as "may be provided", "could encourage" or "to serve visitor demand as needed". The DEIR has not demonstrated the level of mitigation these measures will provide with assurance.

In-Valley transit measures cannot be assured without detailed proposals, identified budget, and a financing plan. Additional tools to be considered should include:

- Designating eastbound bus stops along Squaw Valley Road (currently there are only westbound stops, making the shuttle unviable for residents);

O2-29 cont.

Tahoe Basin/Truckee travel measures cannot be assured without detailed proposals and a financing plan. Additional tools to be considered should include:

- Real commitments to support, publicize, and subsidize Tahoe/Truckee regional transit for visitors and employees, such as free regional bus tickets, bus and lift tickets for skiers.
- Effective carpool incentives such as preferential and free carpool parking for Tahoe/Truckee visitors and employees, carpool casual carpool pickup spots in Truckee and Tahoe City, free overnight ski lockers, etc.

In addition, timing of developer participation in and fair share of funding for Tahoe/ Truckee regional transit services (TART) must be identified at this time. This subject is discussed in depth in the Friends of West Shore DEIR comment letter which we incorporate here by reference. In summary, Mitigation Measure 9-7 only requires that funding begin after ridership approaches capacity. This does not provide an incentive to increase ridership by the developer. Nor does it provide a definite funding date. In addition, the Specific Plan Transportation and Implementation Elements state that the developer may either provide funding directly, or create a Community Service Area or Community Facilities District (which passes funding responsibility on to resort home and business owners). This funding uncertainty reduces the potential for adequate funding of the transit system. Potential impacts to transit services may result (Impact 9-7) without closure of these program gaps which should be required in the FEIR. O2-30

Out of Basin Measures. Reducing out of Basin vehicle trips to Squaw Valley would have the greatest vehicle miles travelled (VMT) reduction potential. Out of Basin measures cannot be assured without detailed proposals, identified budget, and a financing plan. The "Enhanced Alternatives to the Private Automobile for Regional Access" section of the Specific Plan (p. 30) would need to be designed with additional meaningful, assured, and funded tools, including: O2-31

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- Real commitments to support, publicize, and subsidize Reno and Bay Area transit for visitors, such as free regional bus or train tickets packaged with lift tickets and hotel stays;
- Effective carpool incentives to Reno and Bay Area visitors such as preferential and free carpool parking, free overnight ski lockers, and publicity that encourages carpooling;
- Charging for parking for day skiers and hotel guests to encourage carpooling and transit. To ensure that skiers bear no additional cost associated with the paid parking, daily lift tickets and season passes should be reduced in price correspondingly.

O2-31 cont.

The DEIR should be revised to incorporate the discussion above. A detailed transit program should be prepared prior to Specific Plan adoption. It should include:

- A quantified project VMT reduction goal designed to demonstrably mitigate project traffic and greenhouse gas impacts of the project and its share of cumulative impacts below the significant level. While "no net increase" in traffic and VMT may not be possible, this concept should be considered, evaluated, and modeled for potential in the FEIR as a possible feasible mitigation. Creative mitigation may be able to come close to a no net increase goal. The final goal selected should be expressed in a percentage of allowable increase and should equal the amount of reduction shown to reduce impacts below the significant level for traffic and greenhouse gas emissions.
- Enhanced and assured transit services for visitors from the Bay Area, Reno, and the Truckee/Tahoe region.
- Monitoring to ensure effectiveness of measures and adjustment as needed.
- A budget to carry out the measures and a financing plan, beginning with Plan adoption.

O2-32

8. The Specific Plan does not provide for adequate parking.

The DEIR concludes that effects associated with parking are not considered a significant criterion under CEQA (DEIR p. 9-55, para. 2). However, the SVGPLUO policies call for provision of adequate parking. Inconsistency with these policies would necessitate a conclusion of a significant impact.

The 1983 SVGP specified a requirement for 3100 day skier parking spaces (SVGPLUO p. 48, para. 3), assumed to be the day skier parking for all but the 4 busiest days (Policy CP-10). For the DEIR, a parking analysis was prepared which still shows a 3,100 day skier demand on the 5th busiest day (Table 9, DEIR Appendix G). It is difficult to believe that the day skier population has not increased since 1983, 32 years ago. Please see

O2-33

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the David Stepner DEIR comment letter for a detailed analysis of this issue which we incorporate by reference.

The MacKay and Somps Master Phasing Plan, Exhibit Q, estimates that there are currently 4,980 vehicle parking spaces (3,100 day skier used spaces, 560 existing employee and guest vehicle spaces and 1,320 additional spaces). We do not see 1,320 extra spaces since the parking lots are full on many more than 5 of the busiest days. Regardless, these 1,320 extra spaces will be filled at buildout according to the parking analysis. There will be no room for what we believe is a larger number of day skiers than accounted for in the study than existed in1983. O2-33 cont.

The project should be required to provide for the existing day skier population which we believe has increased substantially since 1983, not reduce it. By not providing for the current day skier number, the project will result in significant impacts (inconsistency with the SVGPLUO and inadequate provision of a public facility) and displace an important segment of the Squaw Valley day population and alter the culture of Squaw Valley.

Mitigation will need to be provided via a substantially reduced density project and

The DEIR should be revised to reflect this discussion.

Visual Impacts

The Significance Criteria based on the Placer County CEQA checklist and Appendix G of the State CEQA Guidelines states that a project would result in a potentially significant impact on visual resources if it would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; O2-34
- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area; or
- Create additional shadowing on existing structures or facilities during a substantial portion of the day

It is our contention that the project will have a significant impact based on all of these criteria, and the mitigations proposed are inadequate to lessen visual impacts below the significant level.

The visual impact section comments below were based on an analysis prepared by Friends of Squaw Valley members (both permanent residents and 2nd home owners).

1. **Visual impact on a scenic vista on visitor groups is under estimated.** O2-35

The analysis separates the groups that frequent Squaw Valley into two: residents and occasional visitors. By doing this the DEIR contends that the visual impact of the project will be

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less than significant to the occasional visitor group, who have no expectation of what was there before and who constitute the majority of viewers. On the other hand, the DEIR does concede that the visual impact will be significant and unmitigatable for the permanent population and part-time residents of adjacent timeshare and hotel condominium projects, but ratlonalizes that they are very small in relation to the occasional visitors, and therefore the impact on them can be ignored. Therefore, though impacts to residents is considered significant and unavoidable, the DEIR contends that, because the occasional visitors will be the vast majority of viewers, the overall impact is lessened. But are there really only two groups?

The EIA accompanying this report (Table A-3) gave 640,725 as the number of visitor-days to Squaw/Alpine. The number for Squaw Valley alone is less, as many people who frequent Alpine do not come to Squaw Valley. A conservative estimate is 600,000 visitor days to Squaw Valley. In addition, the North Lake Tahoe Resort Administration, in a planning presentation to the SVMAC and PSD in May 2015, said that 45% of visitors come from within 3 hours of Squaw Valley. There are also approximately 30,000 season pass holders to the Squaw Valley Ski Area; and most will be in the 45% who live within 3 hours or up to 5 hours if coming from the Bay Area. In a good ski year, they would be expected to come to Squaw Valley perhaps 10 times or more totaling 300,000 visitor days. And these same people likely make up a significant proportion of summer visitors as well. O2-35 cont.

It is clear that the occasional viewer is not the majority of visitors coming to Squaw Valley. Rather the permanent population, the part-time residents of adjacent timeshare and hotel condominium projects, and the day visitors who have been coming to Squaw Valley for years (season pass holders) comprise the majority. And for this group the increase in number and size of structures at the main Village area would increase the visibility of the built environment and would obscure the lower slopes on the mountain to the same degree as the permanent residents as described by the DEIR authors.

The DEIR (Impact 8-1) should be revised to reflect the analysis above. There is no mitigation offered in the DEIR since elimination of the structures with potential to affect scenic vistas is assumed to be infeasible by the authors. As a result, the conclusion should reflect the fact that the impact remains unavoidable to a majority of viewers.

2. **The DEIR conclusion that the primary important view is mountain tops is inaccurate.**

To summarize, the DEIR concludes that the mountain peaks are the dominant and primary point of visual interest in the Valley. This contention is used in a number of the visual impact sections (for example: DEIR Impact 8-1,p. 8-47, line 15 and p. 8-48, para 4; Impact 8-2, p. 8-54. Para2 and p. 8-55, para 3).

The DEIR does note that an increase in number and size of structures in the main Village area would increase the visibility of the built environment and would obscure the lower slopes on the mountain, yet this is not significant . The reasons given are (i) that the mountain peaks surrounding the resort remain the primary point of visual interest, and (ii) the implementation of the VSVSP design guidelines would result in a unified architectural style and landscaping that would screen the lower portions of the new structures. (DEIR page 8-49, para 2) O2-36

However, the reality is that the focus of one's view as one takes in the entire vista is not just the upper mountain but also the Village. In addition, the view shifts more and more to the Village as one gets closer. With the size of the buildings permitted by the Specific Plan, the Village aspect

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will become more overwhelming, regardless of whether the VSVSP guidelines are implemented since these same guidelines permit buildings up to 108 feet in height with very close spacing. In addition, this rationale that the primary point of visual interest is the mountain peaks dismisses the importance of the internationally recognized foreground and middle ground views of the meadow, village, and lower slopes, views which will be altered by the project mass and height. (See Exhibit 8-14 below which shows the foreground and middleground.)

Referring to the image below (from DEIR Exhibit 8-14), the viewpoint is in the meadow (the foreground), at a distance. The mountains rise well below the Village. However, consider, as one approaches, the difference in impression of the left hand side (the Village project) vs the right side (the existing IntraWest Village). The difference in visual character and height/ mass of the structures is marked. This becomes more and more apparent as one comes closer to the Village area.

O2-36 cont.

To state that the primary view is the mountain tops is to state the obvious, and avoids the reality that as visitors and residents approach the Village, the mass and scale of the Village will dominate their view and substantially degrade the existing visual character and quality of the site and its surroundings. This impact will be significant and unavoidable and cannot be mitigated by use of the Design Guidelines as concluded in Mitigation 8-2b (DEIR p. 8-54, para 3). The DEIR should be revised to reflect this conclusion.

3. The impact of density and height of buildings is underestimated in the DEIR.

At the same time as stating in Impact 8-1 (DEIR p. 8-50, para 4) that the mountains are the primary view and the Village, being small in comparison, is not a major visual concern, the DEIR then states "*the project could have potentially significant impact on the views (i) by increasing the density and height of buildings, and (ii) including buildings, landscaping, and signs that are*

O2-37

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incongruous with the natural setting and inconsistent in design" (page 8-52. It goes on to say "*views from the east of the project site would be altered by the increased numbers of structures that would be taller and closer to the viewer than the existing Intrawest Village structures.*" (Page 8-48) The above picture shows that the same will be true from the meadow, and, in fact, the images show that this will be the case from every aspect. Note that from the homes to the north, the increased density and height of the buildings will impact the views (DEIR Exhibit 8-9). O2-37 cont.

However, the DEIR largely minimizes the role of building heights in visual impacts by not directly discussing the issue in the key paragraphs analyzing visual character impacts:

- Impacts from the existing development and Squaw Valley Rd in the spring and summer due to heights of new buildings is not discussed directly (DEIR p. 8-52, para 3). The DEIR does note in this section that in some cases "views of the distant mountain peaks may be largely blocked", and this is clearly shown in Figures 8-17 and 8-19; however, no height reduction is proposed in the mitigation measures section. Rather, it is noted that the Specific Plan avoids height impacts by providing for a structure of varying heights next just east of Intrawest Village. Yet, these varying heights rise to 108 feet, clearly blocking existing views from this location (see DEIR Figure 8-17). O2-38
- Impacts from the main Village area and Squaw Valley Rd. in the winter are dismissed due to diminished prominence of buildings by snow cover even though it states that buildings would partially obscure views of the mountains (DEIR p. 8-52, para 4). O2-39
- Views from the Resort at Squaw Creek are dismissed because though new buildings would be dominant they would be "consistent with the character of the developed environment in the immediate foreground" (DEIR p. 8-52, para 5). Figure 8-14 shows this to be untrue, the increased height of the new structures being the most notable change in character from the adjacent existing Village. O2-40
- Open and unique views from the new Village to the tram are closed. This is not discussed in the DEIR. O2-41

Visual degradation to the site and its surroundings (Impact 8-2) is concluded to be significant and unavoidable <u>during</u> construction – for up to 25 years. However, again, the only mitigation offered <u>after</u> construction is the implementation of the architectural and landscape design guidelines. Yet, it is these very guidelines that allow for the construction of tall**,** box-like buildings, with very tight spacing, and extensive shadowing. Height is an issue in this case, regardless of the conflicting and sometimes dismissive statements relative to building heights in O2-42

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the DEIR. Mitigation Measure 8-2b relative to the project after construction should be revised to a conclusion of significant and unavoidable, with building heights being a major factor. O2-42 cont.

It should also be noted that the DEIR did not utilize important impact evaluation criteria located in the SVGPLUO and Design Guidelines which could have guided impact decisions relative to building heights:

- "Building design should complement and harmonize with neighboring buildings." Height and scale are listed as 2 ways to achieve compatibility. (SVGPLUO Design Guidelines, Building Design Guideline 1, page 21)
- "A building or project should be in scale with its immediate surroundings and with the area." (SVGPLUO Design Guidelines, Building Design Guideline 3 in part, page 21).

Based on our discussion in this section, we believe that these guidelines would be violated by buildout of the Specific Plan as proposed. O2-43

As a result, FoSV supports a substantially reduced density alternative with buildings no taller than 70 feet so that the character of the expanded village mirrors that of the existing village, does not contrast nor overwhelm it, and avoids significant visual impacts. O2-44

4. The DEIR mischaracterizes night time lighting impacts.

The DEIR concludes that lighting to serve the project would create a new source of substantial night time lighting in the Village area. This impact is concluded to be potentially significant for both the main Village area and the East Parcel in the DEIR. We agree.

However, the mitigation discussion for the main Village area relies on landscaping on the perimeters of the East Parcel to mitigate lighting impacts to neighboring residents (Mitigation Measure 8-5a) and for both the Village area and the East Parcel, adherence to the VSVSP Design Guidelines (Mitigation Measure 8-5b) as well as an additional lighting and photometric plan and design. Headlight blocking mechanisms within the parking structures in the main VC-C area are also proposed. With these measures, the DEIR concludes that lighting impacts from the East Parcel will be mitigatable and impacts from the Village area will be unmitigatable. O2-45

Yet, the discussion focuses mainly on skyglow impacts rather than ground level impacts. In order to fully understand the lighting impacts of the project and the effectiveness of any mitigation, this emphasis must be revised. Relative to night time lighting emanating particularly from the Village project, the issue is the sheer volume of windows. The impact does not result just from indirect skyglow; it will also be a very direct impact to residents at the level of their

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home. The problem is the light emanating from all the windows of the very tall buildings and their appearance from the residences to the north and to Squaw Valley Rd.

The image below shows the increase in window lighting between the current IntraWest

O2-45 cont.

Village and the combined IntraWest and proposed project when complete. The increase in lighting is apparent.

Next is an image from the North (from a location along Christy Lane, the lowest of the parallel streets to Squaw Valley Rd.) Even though there is tree blocking most of the view, again the dramatic increase in lighting is apparent. It is quite clear that the damage is done at elevations above ground level, so the headlight blocking, landscaping, parking lot lighting and other lower level mitigations proposed will not be effective.

We conclude that the impact of both indirect skyglow and direct building night time lighting viewed from residential areas cannot be mitigated with the measures proposed. In order to

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address the direct lighting impact from structures, particularly from higher elevations to the south and north the only viable solution is to

02-45 cont.

reduce the extent of the sources of illumination and to restrict the heights of the buildings to keep the impact closer to the ground. There is nothing in the DEIR lighting mitigation measures

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or the Specific Plan Design Guidelines Lighting section to address these issues (Specific Plan, p. B-89).

The DEIR should be revised to reflect this discussion and the Reduced Density Alternative should be revised to incorporate 50% or more reduction in density and buildings no higher than 70 feet, similar to existing tallest Village heights. 02-45 cont.

5. The DEIR inaccurately concludes that shadowing impacts will be less than significant.

The DEIR concludes that the project will result in less than significant shadowing impacts. The DEIR shadow study shows that, since the main Village area of the project is located close to the southern edge of the Valley (and hence the mountains to the south), the shadowing effect is a factor on neighboring facilities (to the west) only in the AM of the winter months when the sun is at a low angle to the east of the Valley. By noon, even at the winter solstice, shadowing is not a factor at all, and by 3PM the shadows go in the opposite direction.

Looking at other times of the year, and focusing at noon, the results are the same 02-46

Spring 3-20 @ noon

Summer 6-20 @ noon

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Fall 9-20 @ noon

Winter 12-20 @ noon

02-46

However, the section goes on to say: "The proposed structures would also cast shadows on proposed parking lots, outdoor use areas including the open area associated with Squaw Creek, and other proposed buildings". In accordance with the significance criteria above, internal effects of the project are not considered in the analysis." (DEIR p. 8057, para 2)

We disagree that the internal effects of the project should not be considered. Lot 33 is a key gathering space in the proposed project. As the four noon time pictures above show, part of this gathering space is in shadows the entire year, with summer solstice being the only sunny time in this area. All winter long this gathering area would be in shadows and extremely cold. It should also be noted that the building concepts do not necessarily represent the worst case shadowing that buildout of the polygons could generate.

The DEIR authors rely on the CEQA Impact Evaluation Criteria which assumes that a significant visual impact will result if a project will "create additional shadowing on existing structures or facilities during a substantial part of the day" (emphasis added, DEIR p. 8-45. Para 2). However, the DEIR failed to note that existing residents will also use this plaza which is proposed to be the main gathering area for the entire Village. An existing parking area will be shadowed in the winter as well as new walkways (DEIR Exhibit 8-21) which will affect existing and future visitors and residents with both visual and safety impacts. In addition, the existing SVGPLUO Design Guidelines read: "Buildings should be sited with consideration given to sun and shade". (SVGPLUO Design Guidelines, Site Plan Design Guideline 4, p. 11) The design of the project overall, including this main gathering area, clearly violates this guideline which should also be considered an impact evaluation criteria. Contrast this with the image on Page B-5 of the Specific Plan that shows an open, sunny, airy central plaza. The actual project plan bears no resemblance to this depiction. Or contrast this to the Specific Plan objective B-60: "Encourage designs that minimize shadows cast on outdoor gathering areas or residential buildings, especially in winter."

02-47

In particular, it is clear that Lot 33 is a poorly designed gathering space. Both buildings 1A and 1B could be constructed to 108' at the maximum (almost all of 1B could rise to 108') against the boundary of Lot 33. In order to avoid significant impacts, this gathering space should be open to the south, rather than having only a narrow corridor between buildings 1A and 1B. To achieve this, the buildings should be oriented N-S, rather than E-W, and reduced in height. If one studies

02-48

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the Northstar central plaza, the taller buildings are to the north and east, and the buildings to the south and west are less tall, minimizing shadows. In addition, the central gathering area should be shaped more as a large circle or oval, rather than a long, narrow corridor to allow for more sun access.

The DEIR authors did show the plaza open to the south in the Reduced Density alternative as shown below.

02-48

Based on the discussion above, we conclude that the project as proposed will result in significant shadowing impacts. Mitigation should include re-orientation of the potential layout of the buildings with respect to shadowing within the proposed Village core to allow substantially more sun during the during the winter months. However, without reduction in building height, shadowing impacts will still be unavoidable. The FEIR should reflect this additional discussion and conclusions.

02-49

6. **The DEIR failed to discuss the visual impact of parking structures.**

Parking structures are permitted at the entry to Lots 11 and 12, separated from the Village core. The visual impact from Squaw Valley Rd. of parking structures as the first visible buildings before entering the Village would be significant. Currently views are open toward the existing compact village; parking structures in the current proposed locations would substantially degrade the visual character of the site by closing this open view to the Village and slopes behind. Measures to locate free standing parking structures should be developed to prohibit their location at key entry points, directly adjacent to the creek, or blocking critical view corridors. (See DEIR comment letter from resident Judy Carini for additional detail.)

02-50

Groundwater Drawdown and Stream Water Quality

1. **Groundwater drawdown and water quality impacts to stream, meadow, fish and riparian vegetation are underestimated in the DEIR.**

02-51

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