

The Squaw Creek watershed is already an impaired system. The last spawning brown trout was seen in 1995. In 2007, while addressing the TMDL for Squaw Creek, the State Water Board acknowledged that Squaw Creek suffers from (1) excessive sedimentation and (2) inadequate in stream flows. (State Water Resources Control Board Resolution No. 2007-0008 2/20/07). GANDA 2012+2014 reports further documented that "fish populations in Squaw Creek are currently limited by poor habitat conditions resulting from lack of surface flows and excessive sedimentation." As a result, any additional negative impacts to this system must be considered substantial. No further degradation should be permitted.

Yet this project alone proposes to extract an additional 234 AFY of groundwater (28% more) from a sole source aquifer resulting in a projection of groundwater drawdown that will have significant adverse impacts. Though the DEIR maintains that the impacts can be mitigated, the margin of error is very thin.

The WSA is simply an assessment, not a verification, of groundwater availability. It is a predictive hypothesis based on a groundwater model that has significant limitations and uncertainty. It only addresses sufficiency of operational supply, not actual stream flow conditions or biological consequences of additional pumping. Nevertheless, the model predicts a worsening of both water quantity and quality (GANDA 2014, pg 15) from already poor baseline conditions.

The following critical water quantity/quality issues have been omitted from or inadequately addressed in the DEIR:

- There is no mention in the DEIR of consequences to fish and benthic macroinvertebrates other than analysis of concern over drying refugia pools. The Squaw Creek TMDL and associated monitoring have established biological indices as targets. Despite the fact that the project proposes stream restoration of the Squaw Creek trapezoidal section, ground water pumping will result in stream flow drawdown, creek bed drying, loss of riparian plants, and resultant additional erosion will risk harm to the biology of the creek. (Ganda 2012 & 2014)
- Restoration of Squaw Creek is not proposed until approximately 40% of project buildout. In order to mitigate potential project stream impacts which will be additive to existing impacts in this impaired system and to implement Placer County General Plan policy 6.A.11, this restoration should be implemented with initial construction.
- In just the last four consecutive drought years, we have witnessed the western portion of the creek to dry up earlier (temporally) and longer (spatially) which is not incorporated into the model.

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- The groundwater model has not been calibrated to measured stream flows and only assesses up to one foot above streambed.

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2. Groundwater drawdown and water quality mitigation measures proposed in the DEIR do not adequately avoid significant impacts to stream, meadow, fish and riparian vegetation.

The DEIR, citing the Water Supply Assessment (WSA), concludes that groundwater elevations will fall over 3 feet in certain areas of the aquifer in drier years and could significantly impact riparian vegetation in the west channel and upper east channel of Squaw Creek as well as result in increased drying of fish refugia pools. The GANDA report (2014) also determined that "... *additional extraction of groundwater... could affect the magnitude, duration, timing, and spatial extent of intermittent (or lacking) stream flows, as well as the quality of refugia pools... (as well as) affect water quality*". As a result, the DEIR concluded that these impacts would be potentially significant (DEIR p. 6-46, para. 1)

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We do not believe that the future verification plans outlined in Mitigation Measure 13-4 will assure mitigation of biotic impacts (meadow and riparian vegetation, stream bank erosion and refugia pools, fish and benthic macroinvertebrate) below the significant level for the following reasons:

- These measures focus solely on operational pumping controls (mainly adhering to a 65% saturation safe rate) as a panacea to protection of groundwater levels. Certainty is not warranted since this is confirmation based on inductive reasoning from a limited groundwater model. It is a hypothesis at best. No confirmation could also result.
- Uncertainties and limitations of the groundwater model limit its usefulness. In fact, the WSA concluded that: "*Both future supply availability and demand variations will be linked to the exact timing of precipitation and runoff and the effects of climate change. However, there is not currently adequate information regarding potential changes in the timing of recharge to the Basin or demands in Squaw Valley to reasonably predict the effects of climate change on water supply availability.*" (WSA p. 7-2, last para) It is likely that these changes will almost certainly result in less groundwater recharge and should be factored into conclusions.
- The DEIR proposal relies on deferred preparation of criteria to minimize groundwater pumping impact and adequacy of supply. (DEIR p. 13-63 and MMP, p. 46). The outline of subjects to be included in future criteria (DEIR page 13-63 to 13-65) does not meet the CEQA allowance for performance standards to provide mitigation (CEQA Guidelines Section 16126.4 (a)(B)) since (1) it has not been adequately demonstrated that the 65% saturation goal in the western well fields will protect biotic resources and stream quality and (2) criteria A.iv at DEIR p. 13-64 ("*Any additional measures by the SVPSD (or other water*

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provider) or the County to address operational concerns and protection of water quality”) does not provide a standard to monitor. A more effective groundwater monitoring, management, and response plan is needed. It should be prepared before Specific Plan approval and should include:

- o A hydrographic basin conditions scale and map as well as basin condition triggers which will dictate how much drawdown will be allowed when triggers are reached. This will allow inclusion of the upland well areas (horizontal wells and SkiCorp bedrocks wells) and include all recharge/input areas ridge to ridge which are not part of current maps.

A pre-determined and agreed upon plan to reduce or stop groundwater extractions should be included to ensure speed and effectiveness of response if problems arise. This should include a response plan with specific actions outlined for mitigation if adverse biotic impacts to the meadow or creek result. If groundwater drawdown or biotic impacts exceed an agreed upon level, additional land use entitlements should not proceed.

- o There is also reference (MM 13-4) to a groundwater sustainability plan (GSP) which the DEIR suggests "may" be undertaken by SVPSP; this should be part of the plan discussed above. The current Olympic Valley Groundwater Management Plan has laudable goals and objectives, but no real specifics, benchmarks, or triggers for responding to worsening conditions. Such a binding document needs to be established prior to any County approval of this proposed development.
- o Secured funding for and commitment to an ongoing study of the entire aquifer and its recharge area, including groundwater supply and biotic support issues. The developer must guarantee a secure, in perpetuity funding source for further studies as well as implementation of the action plan (as required by Placer County Policy 6.A.4.f.).
- o The responsible agency must be Placer County, as the agency with jurisdiction over future entitlements and environmental concerns. (The Squaw Valley Public Service District has no charter or capacity to conduct biologic monitoring and has no authority over entitlements.)

The DEIR suggests (MM13-4) future Development Agreements with the Squaw Valley Public Service District. Since the SVPSP's only charter is groundwater management, Placer County also needs to establish a Development Agreement regarding surface water, biotic effect monitoring triggers and consequences and contingency plans. These documents should allow public review and input. The agreements need to be secured prior to Specific Plan approval, not at the time of crisis or deferred to a later date when their effectiveness cannot be reviewed in the public arena of the EIR review.

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- o An ongoing oversight committee, open to the public, should be formed to evaluate the monitoring results and to oversee mitigation implementation in perpetuity.
- o The groundwater monitoring and mitigation implementation program should be included in a separate detailed Public Facility Master Plan and Financing Plan within the Specific Plan. The groundwater system is a public facility and therefore requires a master plan under Specific Plan law (California Government Code Section 65451). The Financing Plan should estimate the cost of the program, to be adjusted as mitigation is implemented for the life of the project and the monitoring/action program.

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Additional mitigation to respond to groundwater effects was necessitated in the DEIR because Mitigation Measure 13-4 relies only on the WSA operational plan that may or may not be effective in protecting riparian vegetation. As a result, Mitigation Measure 6-1-c includes irrigation (furthering groundwater extraction) to sustain riparian habitat or allows off site mitigation if vegetation is eventually impacted due to groundwater drawdown. Alternatively, additional modeling to predict vegetation impacts at higher elevation above the stream bed than was analyzed in the current groundwater analysis can be conducted to eliminate the need for further riparian monitoring. These measures are not the most effective available and should be revised as part of the groundwater planning and action plan process described above.

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The mitigations described in this section of our comments should be included in the FEIR. We expect that impacts will still be potentially significant and unavoidable without project size reduction. However, impacts would be more effectively mitigated than under the mitigation plan as proposed.

3. Snow storage mitigation is inadequately addressed in the DEIR.

Snowmelt is a source of aquifer and creek recharge. However, snow removed from parking lots contains contaminants that jeopardize water quality.

Existing Village snow storage sites include:

- Just east of the existing current parking lot (Site 4, MacKay and Soms 2014) lies on top of two proposed municipal wells. No contamination has been identified to date. New construction and creek rehabilitation of the Olympic Channel will require modifying and partially abandoning this location.
- North of the Squaw Creek trapezoidal channel (Site 3, MacKay and Soms 2014) is a key existing snow storage location. It results in a visually impacting blackened hillside each spring and, upon melting, flows directly into Squaw Creek and the western drinking water aquifer.

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These areas will receive continued snow storage with project buildout in addition to three other sites (5 total sites), yet no analysis of the adequacy of water quality protection methods proposed from the runoff is included in the DEIR. Rather, impacts were considered less than significant because total snow storage in the Village area will decrease over existing. (DEIR p. 13-90, para 1)

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East Parcel considerations:

- Currently, snow is hauled from the existing Village to Lot 4, the East Parcel. This will no longer be feasible with East Parcel development. The DEIR does not resolve this dilemma. The developer owns the land under the existing Village and 50% of the commercial area. SVRE should be required to provide a solution and funding to resolve the current unacceptable and impacting practice of snow removal off site from the existing Village.
- New snow storage proposed adjacent to Squaw Creek will drain directly in to the creek. Even though this does not impact Squaw Valley's aquifer, it will potentially impact the water quality of lower Squaw Creek and the Truckee River. The conceptual snow storage map (Exhibit 13-31) and the mitigation measures recommended in the DEIR (MM 13-7) do not provide enough detail to ensure no reduction of long-term water quality degradation from snowmelt and runoff from the East Parcel. Rather, specific details are deferred to future preparation and a "Subsequent Conformity Review Process" leaving us no possibility of reviewing their potential for effectiveness now.
- "Off-hauling" is considered an option to solve the snow storage dilemma facing this project (DEIR p. 13-80, para. 1). Removing potential water and recharge resources outside this watershed is an unacceptable mitigation that will potentially adversely affect another watershed and has not been evaluated in this DEIR.

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Detailed snow storage runoff analysis is needed from both the east and west areas before the Specific Plan is approved as well as new analysis of snow storage options that do not jeopardize drinking water wells, the creek, or transport critical water/snow out of the watershed.

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4. The fractional cabin area key recharge zone should remain undeveloped and more extensive mapping and understanding of recharge is needed.

According to the WSA (Moran, LLNL 2013 & Williams, HydroMetrics 2013), most recharge to the Squaw Valley aquifer comes from just above 6300 feet around the perimeter of the valley. The area of the proposed fractional cabins, Lots 16 & 18, is within the 6200 to 6300 feet recharge area, directly adjacent to the critical, undeveloped recharge zone above 6300 feet. Table 13-4 describes this "mountain front" area that feeds directly into the existing well field. These lots represent the largest remaining

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completely undisturbed area proposed for new impervious coverage by the development. Yet, the DEIR concludes that impacts to groundwater recharge due to impervious coverage increase will be less than significant since impervious acreage will increase only slightly over the entire project area and these lots will utilize "low impact development". This needs to be verified, not by LID management practice compliance, but by scientific analysis specific to this geographic site. The DEIR is woefully inadequate in analyzing this concern.

Derrick Williams, in the Olympic Valley Creek/Aquifer Study Final Report (Hydrometrics, Nov. 2014, p. 19), addressed recharge from the North. This north-side critical recharge area (average 6350 foot elevation) is where Lots 16 & 18 are proposed for fractional cabins and where Lot 19, the heavy maintenance site, will contain impervious roads and an extensive concrete containment basin. The report states (page 4): "*The District should furthermore map and protect the primary groundwater recharge zones...additional mapping efforts may help locate important recharge areas. The mapped recharge zones should be maintained as protected, and potentially enhance recharge areas.*" (Emphasis added.) Additional comments (pg 18) state: "*Mountain-front recharge raises groundwater elevations north of Squaw Creek, near Squaw Valley Road*" and "*The groundwater north of Squaw Creek discharges into Squaw Creek, increasing Squaw Creek flows. ...(and in the middle of the trapezoidal channel) water begins to discharge from Squaw Creek into the aquifer.*" The recommendation is certainly counter to the proposal for developing Lots 16, 17, 18, and 19 with more impervious surfaces.

Given the uncertain groundwater drawdown impacts of the project which require monitoring and response plans as the project proceeds to ensure impact avoidance, it is clear that the protection of the Lot 16 and 18 area should have been evaluated as a potential mitigation measure to accompany the monitoring requirements. This measure should be evaluated in the FEIR to ensure that all available mitigation options are analyzed per CEQA Guidelines Section 15126.4 (a) (B). A groundwater basin recharge map should be created for the uplands immediately above the entire Village setting.

5. The DEIR has inadequately analyzed or omitted important recharge studies.

South side recharge: south side recharge and groundwater flow zones are not analyzed and remain a source of significant uncertainty.

North side recharge: (See discussion of the 2014 Hydrometrics report in our Section 2 above.)

Pumping Management Plan as mitigation: Again, regarding the DEIR reliance on the pumping management plan (MM 6-1c and 13-4) as a strategy to protect the creek and lessen biotic impacts, the Olympic Valley Creek/Aquifer Study Final Report (Nov 2014) also acknowledges (p. 39) that "*...the basin may not be large enough to store much water away from the creek. ...(and) pumping may intercept water that would eventually*

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flow to the meadow, and into Squaw Creek." It goes on to note: "this strategy is conceptually beneficial to creek flows, the benefit to the Squaw Creek will only be known after additional analysis and testing of the strategy." This is hardly the same confidence expressed in DEIR Mitigation 13-4 and 13-5 which claim that by following "operational parameters", there will be no "substantial adverse effects on water quality, Squaw Creek and/or biological habitat" and will "result in confirmation that groundwater pumping does not result in losses of riparian vegetation in the west channel or upper east channel of Squaw Creek".

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Groundwater mapping not ridge to ridge: Current aquifer mapping is not extensive enough for a full understanding of the groundwater system of the Valley and needs to be augmented with a hydrographic map of the entire basin, ridge to ridge, as recommended previously in this section.

6. Impacts to Squaw Creek as a result of proposed restoration plans defer too much analysis of impacts onto further study.

Extensive further study is recommended by the DEIR to understand the potential impacts of the proposed restoration of Squaw Creek trapezoidal section (Impact 13-6 and Mitigation Measures 6-1a and 6-1b). This deferral of detailed plans and analysis leaves impacts uncertain and potentially significant at this time. Detailed plans should be prepared before the Plan is adopted and analyzed in this EIR.

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In addition, as discussed previously, restoration of Squaw Creek is not proposed until approximately 40% of project buildout. In order to mitigate potential project stream impacts which will be additive to existing impacts in this impaired system and to implement Placer County General Plan policy 6.A.11, this restoration should be implemented with initial construction.

Public Facilities/Services

1. Provision of public facilities and services are not adequately ensured in the Specific Plan, an inconsistency with the Placer County General Plan, and therefore, a potentially significant impact will result.

The DEIR concludes (p. 4-23, para 1) that the very vague Specific Plan public facility/service policies (Specific Plan policies PU 1 and PU 5) are adequate assurance that public facilities and services will be provided. It concludes that the Specific Plan meets Placer County General Plan policy 4.A.2 requiring that the County shall ensure through the development review process that adequate public facilities and services are available to meet serve new development.

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We disagree that Placer County General Plan 4.A.2 has been met. This is because the Specific Plan does not provide detailed public facility master plans nor an adequate

Financing Plan. The DEIR consultants were asked to evaluate a Specific Plan which is in violation of California Government Code Section 65451, which requires that Specific Plans include detailed public facility and service master plans and financing plans:

California Government Code Section 65451,
 (a) *A Specific Plan shall include....:*
 (2) *The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.*
 (4) *A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).*

The lack of a financing plan and detailed public facility maps and details improperly defers disclosure and environmental review of necessary critical elements of the Specific Plan which should be reviewed at this time, and provides inadequate mitigation.

Sections 8.4.1 through 8.6.2 of the Specific Plan outlines an implementation and financing strategy for public facilities and services that does not meet State Specific Plan requirements. It is not appropriately specific as to phasing, cost, responsibility, or feasibility of planned public facilities and services. Instead, the following measures serve as a substitute to a detailed financing plan:

- Phasing is permitted to be building by building rather than by area (Specific Plan p, 8-5, para 10);
- Public facility master plans will be developed at a future date (SP Policy IM 4);
- Responsibility for financing is by individual developers. However, public financing may be requested (such as fees or assessment districts, etc.), creating an uncertainty as to how facilities will actually be financed and who will pay for them;
- Feasibility of the public facilities and services and resulting fee levels will be determined at a later date in a Public Facilities Financing Plan (which cannot be determined now because general cost estimates for each facility have not been provided).
- The Master Phasing Plan (MacKay and Soms, July, 2015) does not require phasing by time period.

The effect is not the identification of "*financing measures necessary to carry out...*" the Specific Plan as required by State Specific Plan law 65451. Rather, The Specific Plan simply restates that financing measures will be identified in the future.

The DEIR authors, the public and decision makers cannot determine if future master plans will ensure adequate provision of facilities and services in advance of their

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preparation. These master plans and financing plans must be prepared before the EIR is completed. Mitigation cannot be assured without this information.

The following questions must be answered in the EIR:

- Are the proposed facilities and services feasible given the absence of comprehensive cost estimates and a Financing Plan?
- Could the costs of providing facilities and services be so high that the project is infeasible? Could this result in eventual pressure to reduce the level of services promised? Could this result in failure of the special assessment districts, leaving the County taxpayers holding the bag?

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2. A needed fire station location is not identified in the Specific Plan or the DEIR (Impact 14-7).

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This omission results in a significant impact that must be mitigated.

Cultural Resources

1. The potential loss of two of the historic buildings from the Olympic era which still have historic integrity can be better mitigated. This is not an unavoidable impact.

The Nevada and Athlete’s Center (Olympic Village Inn-OVI) buildings from the Olympic era still exhibit historic integrity according to the DEIR. They will be demolished as part of the project. The DEIR correctly concludes (Impact 7-1) that this will result in a significant, unavoidable impact. However, we believe that this impact is avoidable. Preservation of these structures should be considered viable mitigation measures. The Athlete’s Center-OVI is proposed to be replaced by fractional cabins. The Nevada building is in the location of the proposed MAC. Minor revisions could be made to the Plan to allow for their retention; and these should be categorized as mitigation measures to ensure the likelihood that they will be implemented. They could also be incorporated into the two revised Reduced Density Alternatives that we have recommended at the end of this letter.

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It is up to the developer to explain in detail and with specific financial estimates why these buildings cannot be preserved if this measure is rejected.

The loss of these building would be inconsistent with Policies 5.D.6 and 5.D.7 of the Placer County General Plan (DEIR p.7-13) because the resources can be retained; no evidence to the contrary has been presented.

In addition, though the DEIR recognizes the importance of the Olympic era buildings to Squaw Valley, it neglects to note that the entire area has been designated California

Historic Landmark 724 relative to the importance of Squaw Valley and its Olympic era to the expansion of the ski industry in California. This designation adds additional impetus to preservation of the remaining Olympic era buildings.

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The FEIR should include a mitigation measure be added to Impact 7-1 requiring retention of the Nevada and Athlete’s Center-OVI buildings to ensure that all feasible mitigation is utilized or that their retention be incorporated into a revised Reduced Density Alternative.

Noise

1. Traffic noise levels may be underestimated due to flawed traffic report.

As we have discussed previously, the traffic volumes have been underestimated in the DEIR. As a result, traffic noise impacts may have also been underestimated. This should be rectified in the Final EIR.

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The DEIR also dismisses the importance of this impact because of the “relative infrequency” of the peak traffic times (DEIR p. 11-31, para 3). We would appreciate it if this editorial comment would be removed from the DEIR. Many of our members are residents along Squaw Valley Road and can report that it is their perception that traffic noise levels are extremely high during much of the summer and winter, affecting their quality of life. Though the County has adopted noise standards which allow for significance criteria to increase where base levels are higher, the effect is that actual noise impacts to residents is substantial.

2. We agree with the DEIR; unavoidable exterior traffic noise on Squaw Valley Rd. (DEIR p. 11-33).

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This impact can only be reduced substantially with a substantially reduced density alternative.

3. Interior traffic noise levels will be more impacting than reported.

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We disagree with the DEIR (Mitigation Measure 11-5) that interior noise levels in the summer will be reduced to the acceptable 45 dBA Ldn because of standard insulated construction and double paned windows. In the summer, these homes will likely have open windows because of the pleasant high elevation climate. In fact, many homes in this area do not have air conditioning because of this, with no ability to reduce traffic noise intrusion during warm months.

This conclusion should be revised to significant and unavoidable or significant and mitigatable after additional measures are explored. A variety of traffic noise reduction techniques should be evaluated including provision of air conditioning or other means of

better sound insulation to affected homes, lowering of the speed limit on Squaw Valley Rd., and trip generation reduction methods such as more effective mass transit.

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4. Stationary noise sources will be more impacting than reported.

Mitigation measure 11-3 requires that all stationary noise sources be oriented, located, and designed in such a way that reduces noise to comply with Placer County noise standards. It is difficult to foresee at this time that this measure will be fully effective since actual building site plans do not exist. Mitigation cannot be assured at this time.

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This impact should be termed significant and unavoidable.

5. Construction noise significant, unavoidable impacts noted in the DEIR support a reduced density alternative with construction end at 10 years.

The DEIR concludes that construction noise levels will be significant and unavoidable particularly because of night time construction and the fact that construction periods will extend for up to 25 years. We note that construction will take place day and night at times. Winter construction is common with current construction technology.

We agree with the significant, unavoidable conclusion and for this reason, we request discussion of two revised reduced density alternatives in the FEIR which include approval of the Specific Plan at a substantially reduced density and only to the end of a ten year period. After this period, additional land use entitlement applications would be required via a revised Specific Plan or Planned Unit Development proposals with additional environmental review.

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In addition, additional measures that should be required include:

- Reduced construction truck traffic hours beyond Placer County standards, such as 8 am to 6 pm.
- No construction trucks on Squaw Valley Rd. during holidays where the parking load is expected to be over 50% of capacity, nor on snow plowing days.

Population Growth

1. The peak overnight occupancy numbers are not supported.

The DEIR concludes that the peak overnight occupancy generated by the project in Squaw Valley will total 5,878 people. Combined with the existing population and future population from other projects a total peak total overnight occupancy of 9,483 is projected (DEIR p. 5-12 (para 2)). The DEIR notes that this number does not exceed the Specific Plan planned maximum overnight peak population of 11,000-12,000 (DEIR p. 5-12, para 2). These conclusions are flawed for the following reasons:

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- In determining these numbers, average occupancy rates for various types of housing and transient lodging assumed in the WSA were used. These occupancy rates are not supportable. In fact, the WSA concludes that “no assessment of this transient component of effective population has been completed” (DEIR Appendix A, p. 3-2, para 1). It appears that the MacKay-Somps reports which generated the original occupancy rates were based on averages, not peak periods.
- More realistic peak overnight occupancy calculations should be prepared using occupancy based on actual bed counts which are likely to be substantially higher on peaks days than average occupancy. High occupancy rates are common in ski areas on peak days.

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Based on the discussion above, accuracy of calculations or conclusions related to the following population related impacts in the DEIR are suspect: inducement of population growth (Impact 5-2), traffic and parking, water supply, groundwater drawdown, air quality, greenhouse gases, traffic noise, public facility/service needs.

The peak overnight population calculations should be reanalyzed based on the discussion above and conclusions revised accordingly.

2. The 11,000 to 12,000 assumed maximum peak overnight population for Squaw Valley referenced in the SVGP is no longer supportable.

The SVGP and the Placer County General Plan include wording which makes it clear that the 11,000-12,000 peak overnight population maximum originally planned for (SVGP p. 5, para 2) should be tempered by potential environmental impacts:

- a. *“...the quality of the permanent residential community must not be adversely affected by the detrimental effects of a short term, high intensity use by a transient, seasonal population.”* (SVGP, p 5, para 3)
- b. *“...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)
- c. *“The County will support the expansion of existing winter ski and snow play areas and development of new areas where circulation and*

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transportation system capacity can accommodate such expansions or new uses and where environmental impacts can be adequately mitigated.” (Placer County General Plan, Policy 1.G.1)

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Consistency with the Placer County General Plan and SVGPLUO should be termed significant and unavoidable relative to the policies listed above due to the numerous unavoidable impacts which have been identified in the DEIR.

Air Quality and Greenhouse Gas Emissions/Climate Change

1. The DEIR underestimates project air quality impacts.

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The DEIR concludes that air quality impacts can be mitigated below the significant level by using measures outlined in the adopted regional air quality management plan. However, the DEIR failed to address the health risks of construction period emissions in the short term as well as over a 25 year buildout period. The Sierra Watch DEIR comment letter prepared by Shute, Mihaly, and Weinberger details this impact and we incorporate that section of their comments by reference here.

In addition, as we have discussed in the Traffic section of this letter, the DEIR underestimated trip generation and VMT projections of the project which will result in an underestimate of air quality impacts.

The DEIR should be adjusted to incorporate analysis of the issues discussed above.

2. The DEIR analysis of project greenhouse gas emissions and contribution to climate change are inadequately addressed and underestimated.

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The DEIR concludes that project greenhouse gas emissions in 2020 will result in less than significant impacts. This conclusion is flawed for a number of reasons as outlined in detail in the Sierra Watch DEIR comment letter prepared by Shute, Mihaly, and Weinberger. We incorporate their discussion of this issue by reference here.

To summarize:

- The DEIR values project emissions against future hypothetical conditions rather than baseline existing conditions.
- The project greenhouse gas emission of 45,403 tons of CO2 per year vastly exceeds the threshold adopted for this region of 1,100 metric tons of CO2 per year. However, the DEIR concluded that this is less than significant because new State and regional emission reduction regulations are expected to be in place in the future and, therefore, project emissions are evaluated against this hypothetical future condition.
- The DEIR inappropriately defers analysis of impacts after 2020 to a later date.
- Consistency with State and regional plans for greenhouse gas reductions is not discussed.

- Because greenhouse gas emissions are concluded to be less than significant, available feasible mitigation is not explored.

The DEIR should reevaluate project contribution to climate change based on the discussion above, concede that impacts will be significant, and develop a meaningful and assured action plan.

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Alternatives

1. The Final EIR should analyze Reduced Density Alternatives with additional design features to mitigate a wide range of unavoidable impacts.

CEQA requires agencies to discuss alternatives which would reasonably attain most of the project objectives and which would avoid or substantially lessen one or more of the significant impacts of the project (CEQA Guidelines, Sections 15002 (a) (3), 15021 (a) (2), 15091 (a), 15126.6 (a), 15126.6(c).) The creation of the environmentally superior alternative cannot be accomplished without evaluating a reasonable range of alternatives, (CEQA Section 15126.6 (a) and San Bernardino Valley Audubon Society v. County of San Bernardino, 1984). In addition: "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making (CEQA Guidelines Section 15126.6 (f)). In this case, the DEIR discusses only one alternative scale beyond the procedural No Project alternatives. The alternatives were also not devised to address the elimination or reduction in intensity of many critical unavoidable impacts which would result from the project as well as additional unavoidable impacts which we have described in this letter.

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FoSV recommends that the alternatives below be additionally analyzed in the FEIR. We believe that they are of such importance and public interest that the EIR would not be legally adequate without their presentation.

a. New Alternative 1

We recommend that the Reduced Density Alternative in the DEIR (50% of bedrooms proposed - total of 747) be revised to include additional design features which would mitigate critical unavoidable project impacts more effectively.

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b. New Alternative 2

A second new alternative should evaluate a greater reduction in bedrooms (400), with all of the same additional design features.

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c. Additional Design Features

Additional Design Features in both new alternatives should be incorporated to address key unavoidable impacts and are listed below:

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- **Reduced Height of buildings to 70 feet maximum**

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The approximate height of the tallest building in the existing Village is 65 feet.

The DEIR (p.17-12) maintains that reduced heights would not meet the sponsor's objectives. We disagree:

Reduced height (with no density reduction) was discussed and evaluated in Section 17.23.8 of the DEIR and rejected for further analysis. It was determined that reduced heights would not meet some of the project sponsor's objectives (last paragraph of Section 17.23.8). However, it was not demonstrated that the sponsor's objective of a compact design that minimizes the overall design foot print (sponsor objective 7) cannot be met in other ways than use of tall buildings. For example, reduced heights plus reduced density would achieve a similar footprint. In addition, the intent of this sponsor objective is so vague as to make it unclear how another design could not meet what appears to be the most basic intent of the project (to provide a year round destination resort that is economically sustainable without adversely affecting the unique aesthetic and environmental assets of Squaw Valley). A somewhat less compact building arrangement would also not impact the sponsor objective (11) to minimize automobile use within the village; either arrangement is easily walkable. The compact development objective has been stretched to manipulate the environmental review process so that it would be difficult for the DEIR authors to feel free to suggest a true reduced scale alternative which logically to a layperson would include reduced heights and reduced bedroom numbers.

Finally, the DEIR concludes (DEIR p. 17-12, para 4, last line) that reduced heights would not reduce or avoid visual impacts. We have refuted this conclusion in the Visual section of this letter.

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• **Elimination of the MAC**

Without the 90,000 square foot, 1098 foot high MAC, recreational features would be integrated throughout the Village in lesser scale individual facilities. The intent would be to create a more active Village throughout consistent with the SVGPLUO and eliminate the incompatible and visually impacting mass and height of the MAC building.

The DEIR maintained that elimination of the MAC would not meet the sponsor's objectives (DEIR p. 17-11). We disagree:

It has not been demonstrated that a year round resort of sufficient size and services to be on par with peer World Class North American ski destinations requires a massive single building indoor recreational facility (sponsor objective 1). Though the specific recreational facilities to be provided have not been identified with definity in the Plan, most of the potential facilities could be integrated into the Village proper, which would

02-85

better meet the vision for the Village in the SVGPLUO for an interesting, pedestrian oriented, mixed use area. Specifically, the SVGPLUO states: "Commercial and tourist residential uses are encouraged to be provided within the same structure." (SVGPLUO, p. 84, para 5). This massive, single use structure does not meet these goals and is therefore inconsistent with the SVGPLUO resulting in an unavoidable land use impact. On addition, whether or not the project would be economically unsustainable or infeasible without the MAC in the configuration proposed has not been demonstrated.

02-85
cont.

- **Phased and use balanced construction of reduced density project to end at 10 years.**

This alternative feature would require that no land use entitlements be granted to the project permitting development beyond 10 years and that during this period a balanced mix of commercial, lodging, and time share residential land uses would be required to be constructed.

The DEIR concludes that numerous unavoidable impacts will result related to construction impacts as well as the longevity of construction (visual, traffic, noise). In addition, the Specific Plan's lack of a phasing plan avoids the ability to ensure that a balance of uses will result as the project proceeds. This is inconsistent with the SVGPLUO which calls for a Village "... attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area." (DEIR p. 84, para 5) Balanced uses within each construction phase will also avoid concerns about the ghost village effect, too heavy provision of lodging early in the project before the actual market for year round visitation is demonstrated or provided for. (We discussed this potentially unavoidable impact in the Population and Land Use impact sections.)

02-86

A ten year phase of land use entitlements would assume that if additional entitlements are requested after this period, impact bench marks would be evaluated before additional phases are approved. Benchmarks should include all critical impacts of greater development levels than the reduced density discovered in this EIR.

- **Mass transit plan**

This alternative should include the Mass Transit Plan features discussed in the Traffic section of this letter to address unavoidable traffic impacts.

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 or alternative. 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

02-87

should equal the amount of reduction shown to reduce impacts below the significant level for traffic and greenhouse gas emissions.

02-87
cont.

- **Move fractional cabins**

This alternative should include moving the fractional cabins out of the critical recharge area near the well field to lessen what we believe are potentially significant, unavoidable impacts.

02-88

- **Full wetland restoration with initial construction phase**

This alternative should include full construction of proposed Squaw Creek restoration within the first construction phase in order to meet SVGPLUO policy and to better address biotic impacts identified in the DEIR as we have discussed in this letter.

02-89

- **Move maintenance yard**

This alternative should include relocation of the proposed maintenance yard to avoid land use impacts of conversion of F-R zoning in this visually sensitive location.

02-90

- **Retain Nevada and OVI buildings**

This alternative would enable preservation in place or via relocation of these historic structures and avoid significant, unavoidable impacts due to their loss.

02-91

The table below outlines which unavoidable impacts would be addressed by the alternative features described above.

**FoSV Recommended Revised Reduced Density Alternatives'
Ability of Key Features to Address Significant, Unavoidable Impacts**

Features of Revised Alternatives	DEIR unavoidable impacts addressed more effectively	Additional impacts which FoSV believes are unavoidable also addressed by this alternative
<p>Reduced Room Counts</p> <p>Alternative 1: 50% room reduction (747 rooms)</p> <p>Alternative 2: 30% of proposed rooms (450 rooms)</p>	<p>Visual impacts due to construction activity 8-3</p> <p>Light and glare 8-5</p> <p>Traffic within Squaw Valley 9-2</p> <p>Construction noise impacts 11-1</p> <p>Greenhouse gases 16-2</p>	<p>Conflict with Placer Co GP</p> <p>Removal or degradation of sensitive habitat due to potential groundwater drawdown</p> <p>Construction traffic impacts 9-8</p> <p>Construction vibration impacts, 11-2</p>

02-92

		<p>Traffic noise impacts, 11-5</p> <p>Air quality, 10-2</p> <p>Land coverage and pumping impacts to groundwater 13-4, 13-5</p> <p>Climate change 16-3</p>
Both alternatives to include the following additional features:		
1. Max ht of 70 ft buildings	Adverse effect on a scenic vista 8-1 and visual character 9-2 and scenic resources 8-3	<p>Conflict with SVGPLUO and DG</p> <p>Scenic impacts operational 8-2 and 8-3</p> <p>Shadowing 8-4</p>
2. Elimination of MAC, integrate rec uses into Village	Adverse effect on a scenic vista 8-1 and visual character 8-2 and scenic resources 8-3	<p>Conflict with SVGPLUO and DG</p> <p>Scenic impacts, operational 8-2 and 8-3</p>
3. Phasing Land use entitlements only to 10 years with balance of uses to be permitted now	Same as reduced room counts	Same as reduced room counts
4. Effective Mass Transit Plan Required Now	Traffic impacts to Highway 89 and 80 9-4, 9-5	Impacts to mass transit 9-7 Basin wide traffic impacts not discussed in DEIR
5. Move fractional cabins out of critical groundwater recharge area		Land coverage impacts to groundwater 13-4, 13-5
6. Full wetland restoration as in Phase 1		<p>Land coverage impacts to groundwater and related biotic impacts 13-4, 13-5, 6-1</p> <p>Replacement for loss of sensitive habitat (wetland) 6-1 and 6-13</p>

02-92
cont.

7. Move maintenance yard to less impacting location		Land use and visual Conflict with existing zoning
8. Retain Nevada and OVI Olympic era bldgs.	Demolition of historically significant bldgs. 7-1	

02-92
cont.

Cumulative Impacts

1. The cumulative impact project list does not include a number of future projects.

Cumulative projects which have not been included for evaluation include regional Tahoe Basin projects (see Friends of West Shore DEIR comment letter), the Squaw-Alpine connector and Project 60, and projects noted in the DEIR comment letter submitted by Judy Carini.

02-93

2. Cumulative impacts have not been discussed in light of the CEQA requirement that cumulative impacts include “two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts.” (CEQA Guidelines Section 15355)

As examples, this analysis would likely reveal combined impacts such as climate change and groundwater drawdown (significant reduction of water supply); traffic, noise, night sky lighting, and air quality impacts combined (potential inconsistency with adopted area land use plans related to recreation assets, recreation capacity, economic, visual, and quality of life issues). The DEIR should be revised to analyze the combined effects of project impacts.

02-94

Given the extent of revisions we expect in the DEIR, we ask that a revised DEIR be prepared for public circulation.

02-95

Thank you for the opportunity to comment.

Sincerely,

Laurie Oberholtzer
City and Environmental Planner
for
Friends of Squaw Valley

02

Friends of Squaw Valley
Laurie Oberholtzer
July 17, 2015

- 02-1 Comments related to the background of Friends of Squaw Valley and its opposition to the Specific Plan are noted.
- 02-2 The comment provides an overview of concerns related to the project. See responses to comments 02-3 through 02-22 for responses to specific topics.
- 02-3 The comment states that Placer County General Plan policies should be considered as impact evaluation criteria (i.e. thresholds of significance). As discussed in Section 1.4 of the DEIR (page 1-4),
- Chapters 4 through 16 identify the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with CCR Sections 15126, 15126.2, and 15143. The topics upon which thresholds of significance were developed are based on the checklist presented in Appendix G of the State CEQA Guidelines; Placer County’s CEQA checklist; the *Placer County General Plan*; best available data; and regulatory standards of federal, state, and local agencies. The level of each impact is determined by comparing the effects of the project to the environmental setting and determining whether substantial, adverse changes would result. Key methods and assumptions used to frame and conduct the impact analysis are also described in Chapters 4 through 16 for each resource topic.
- Even if a potential impact did not “fit” with the CEQA Guidelines or Placer County CEQA checklist, it was nevertheless evaluated in the DEIR.
- The commenter appears to interpret Policy 1.G.1, and the language in the policy (“where environmental impacts can be adequately mitigated”) as precluding approval of projects that are unable to mitigate all significant adverse impacts to less-than-significant levels. This policy, however, does not impose such a requirement. Rather, Policy 1.G.1 raises a policy issue for the Board of Supervisors, ultimately, to determine whether a project’s environmental impacts can be adequately mitigated. With regard to the list of impacts included in the comment, this list is consistent with the discussion of significant impacts in the DEIR, but the Board of Supervisors is not required to deny the proposed project simply because there could be environmental impacts. See the Master Response regarding significant and unavoidable impacts, including a discussion of Placer County General Plan Policy 1.G.1.
- 02-4 Responses to individual policy issues are discussed below in responses 02-5 through 02-18. The commenter’s opinion that the project is inconsistent with the listed General Plan policies (addressed below) is noted. The commenter is reminded that, under CEQA, an EIR must only “discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans.” (CEQA Guidelines Section 15125, subd. (d); *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 919.) When a project is consistent with the relevant plans, no analysis is required.
- 02-5 See the Master Response regarding significant and unavoidable impacts, including a discussion of Placer County General Plan Policy 1.G.1. Also, note that the project does not include an expansion of the ski resort or snow play areas, but does provide lodging,

commercial, and recreational support of these existing uses. See also response to comment O2-3.

- O2-6 The comment implies that the project does not promote patterns of development that facilitate the efficient and timely provision of urban infrastructure and services consistent with Policy 1.A.4. However, as noted on pages 14-28 and 14-29 of the DEIR,

It is anticipated that infrastructure will be constructed in pace with development and the appropriate level of service would be maintained per the *Infrastructure Phasing Plan* (MacKay & Soms 2014b) prepared for the project. This plan addresses infrastructure improvements for ten major backbone utilities and services and is intended to ensure that infrastructure meets the service levels identified by the County as project development proceeds. Utilities would be phased as discrete buildings or parcels are developed, providing sufficient infrastructure capacity to support each building/parcel. Final infrastructure needs would be confirmed during the subsequent conformity review process at the time each subsequent small lot tentative map is submitted to Placer County for approval).

A detailed financing plan, phasing plan, or more detailed public facility/service area plan is not required at this time. (See *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 28 [CEQA only requires “a ‘general description’ of a project’s technical characteristics”].) In regards to specific issues related to public facilities and services, see responses to comments O2-68 and O2-69.

- O2-7 The comment cites Policy 1.D.2 and states that visual impact of the parking structures from viewers along Squaw Valley Road would be significant and potentially unavoidable. As described in Section 2.1, “Project Modifications,” the applicant has proposed changes to the East Parcel layout in response to concerns expressed by the Squaw Valley Design Review Committee and member of the public. These changes include increasing the parking structure setback along Squaw Valley Road from 25 feet to 35 feet. See response to comment O2-50 for a more detailed discussion related to the potential impacts; and the Master Response regarding significant and unavoidable impacts. Although not limited to commercial development, as applicable via Policy 1.D.2, the project has been designed to minimize the visual impacts of parking areas from public roadways and existing residential uses.
- O2-8 The comment cites Policy 1.D.5 and states that there is no requirement that a balance of land use types be constructed in each building phase. The sequence and pace for construction of various land uses and facilities would be market driven; therefore a specific construction schedule has not been developed. By following market demand, it is logically expected that a balance of land uses would be developed to provide a variety of goods and services. In other words, demand for new resort lodging would be followed by construction of lodging and commercial land uses that would serve new resort guests. See response to comment O2-6.
- O2-9 The comment cites Policy 4.A.2 and states that public facilities and services plans should be more specific and detailed. See response to comment O2-6. Note that Chapter 14 of the DEIR details the potential project impacts to public facilities and services, and includes mitigation for any significant impacts, which would relate to deficiencies and the need for additional construction of facilities.
- O2-10 The comment expresses disagreement with the EIR’s conclusion that the project is consistent with Placer County General Plan 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). The basis of this disagreement is associated with the fractional cabin area, which

is a groundwater recharge area. This issue is addressed in Impact 13-4 (Long-term land cover changes and increased groundwater production effects on groundwater patterns, recharge, and aquifer storage in the Olympic Valley Groundwater Basin). As described in this impact (on page 13-52 of the DEIR),

[i]mplementation of the proposed project would result in a net increase in the area of impervious surfaces (e.g., paved surfaces and buildings) by 0.27 acre in the main Village area, but shift impervious surface within different elevation zones, with a net 3.16 acre increase for the zone below 6,200 feet elevation, a 2.89 acre decrease in the 6,200 to 6,300 feet zone, and zero increase above 6,300 feet. This minor total increase in impervious surface and the net reduction in the intermediate elevation zone would have a less-than-significant impact on potential groundwater recharge.

This comment does not provide any evidence to counter this conclusion, thus no further response can be provided.

- 02-11 The comment states that the project is not consistent with *Squaw Valley General Plan Land Use Ordinance* (SVGPLUO) policy 1 because there would be significant and unavoidable impacts. It is important to recognize that decision makers have great latitude to interpret policy, and this policy does not prohibit approval of projects with significant and unavoidable impacts. Rather it states that “Both the quality and quantity of development must be planned to conserve, protect, and enhance the aesthetic, ecological, and environmental assets of Squaw Valley.” This policy is consistent because the proposed zoning and Conceptual Plan concentrate development within the existing parking lots, developed areas, and areas adjacent to existing development. As one instance of this policy interpretation, aesthetics, no development is proposed farther up the mountainsides (second paragraph, page 4-23 of the DEIR). Concentrated, rather than sprawling, land use are aimed to conserve, protect, and enhance the aesthetic, ecological, and environmental assets of Squaw Valley. The project can both result in a significant aesthetic impact, in this case primarily because the project would block views of the lower slopes of mountains, but still be aesthetically pleasing as a development project. Ultimately, while the DEIR addresses these issues, the Placer County Planning Commission and Board of Supervisors will decide if the project, as proposed, meets the overall objectives of the general plan.
- 02-12 See response to comment 02-6 for a discussion related to consistency with Placer County General Plan Policy 1.A.4.
- 02-13 The comment states that the project is not consistent with SGPLUO policy 4, regarding sound social, economic, and environmental practices associated with development. See response to comment 02-6 for a discussion related to a balance of land uses in each phase as the project builds out.
- 02-14 The comment states that the inter-relationships with the Tahoe area economy have not been discussed in the DEIR. Impact 4-5 discusses the project in context of various economic factors within the overall project area, including Truckee and the Lake Tahoe Basin, to determine if it would result in an oversupply of any uses, resulting in over competition and potential blight; no such impact would be expected. Growth-inducing effects are discussed on pages 18-60 and 18-61 of the DEIR, where it is acknowledged that construction workers and project-related employees, as well as economic activities associated with the project operations, could result in indirect growth in the region.
- 02-15 The cited SVGPLUO text states “encourage a concentration of commercial activity (including hotels) in the core area.” The project would do exactly that by providing for hotels and other lodging, along with a mix of other uses. A phasing plan is not mentioned in the quoted SVGPLUO text, nor would one be needed to meet the intent of the statement.

02-16 The comment implies that the project is inconsistent with the SVGPLUO development goal, “provide a mix of housing types for all segments of the population to contribute to a dynamic year-round community” because the project does not provide housing affordable to moderate income households. The development goals of the SVGPLUO apply to the Olympic Valley as a whole. It is not necessary for each project in the valley to fully realize each goal. Rather, some projects will provide housing for the permanent population, others for the transient resort-oriented population and/or seasonal employees. The statement from the SVGPLUO cited in the comment is followed in the SVGPLUO by the statement that “Housing must be provided to accommodate a permanent population, a transient destination resort-oriented population, and both full-time and seasonal employees” (SVGPLUO, page 25). This section of the SVGPLUO does not speak to affordable housing. Nonetheless, it should be recognized that the project does provide a mix of lodging and housing types, including affordable housing in the valley for a large portion of the full time-equivalent employees associated with the project.

The existing land use designations for the 85-acre Main Village area predominantly consist of Village Commercial zoning, and is intended primarily for development of resort lodging and resort serving commercial land uses, not residential housing. The project would provide a mix of resort-residential and guest lodging land uses, including: hotel, condo hotel, fractional ownership, and timeshare units (see page 3-11 of the DEIR). These resort-residential and guest lodging provisions, including fractional vacation homes would be consistent with the intent of the SVGPLUO to “establish a planning framework to ensure that Squaw Valley is developed into a top quality, year-round, destination resort” and to develop “a core area or village at the west end of the valley floor” that would “create an active resort atmosphere to help draw year-round visitors and enhance the economic base of the community.” (SVGPLUO, pages 4 and 5).

02-17 The comment states the project is not consistent with SVGPLUO parking goals but provides no specific instances of this discussion in the DEIR. No further response can be provided.

02-18 The comment selectively cites language from the SVGPLUO at pages 5 and 7, stating that the project is not consistent with densities permitted in the SVGPLUO because it would result in significant and unavoidable impacts and implies these impacts would result in conflicts with existing residents of Squaw Valley; this comment expresses the commenter’s opinion with regard to the degree and extent of impacts and how this may affect the local community. The comment also skips over other language in the SVGPLUO (beginning at the bottom of pages 5) recognizing that:

Central to the Plan is the development of a core area or village at the west end of the valley floor. This would create an active resort atmosphere to help draw year-round visitors and enhance the economic base of the community. The development of an urban village at the logical center of activity in the Valley, will create a focal point of activity. It will reduce the need for day-skier parking in the core area by, in part, replacing the day-skiers with overnight or week long visitors.

As described in response to comment 02-11, the Placer County Planning Commission and Board of Supervisors will ultimately review the project with respect to interpretation of this and other General Plan and SVGPLUO policies, and determine if the proposed project is consistent. See also the Master Response regarding significant and unavoidable impacts.

02-19 The comment takes issue with the DEIR’s conclusion that the project is “predominately consistent” with the Placer County General Plan and SVGPLUO, and claims that any policy with which the project is, in the commenter’s view, inconsistent, must be used as a threshold of significance in the EIR. The County, however, has discretion in what thresholds of significance to use for purposes of preparing an environmental document and determining

- whether significant adverse environmental impacts would result. Lead agencies are not required to use all General Plan policies when preparing an environmental document. An EIR, moreover, need only identify and discuss those policies with which a project may be inconsistent. Utilizing Appendix G of the State CEQA Guidelines, the significance criteria used in the DEIR state that the project would result in a potentially significant impact related to land use if it would conflict with any applicable habitat conservation plan or natural community conservation plan or other County policies, plans, or regulations adopted for purposes of avoiding or mitigating environmental effects. As explained in the DEIR, the project would not conflict with a policy or plan associated with mitigating or avoiding an environmental effect, and such an instance has not been raised in this comment. Moreover, where policies of the Placer County General Plan and SVGPLUO do not establish specific quantitative standards, they do not establish significance criteria for evaluation of environmental impacts. Determination of whether or not to approve the project, based in part on its consistency with the Placer County General Plan and SVGPLUO, is subject to discretionary determinations that must be made by the Placer County Planning Commission and Board of Supervisors. Also see the portion of the Master Response regarding significant and unavoidable impacts that addresses Placer County General Plan Policy 1.G.1.
- 02-20 The project is not within the Lake Tahoe Basin. Section 15125(d) states that the “EIR shall discuss inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.” Because the project is not located within the area covered by the Tahoe Regional Plan, that plan does not directly apply to the project. For a discussion related to effects on the Lake Tahoe Basin, see the Master Response regarding TRPA thresholds.
- 02-21 The comment expresses concern related to the placement of the mountain maintenance facility near the base of Shirley Canyon. However, the project includes improvements to the Shirley Canyon trailhead, including parking, signage, and bike parking. As a result, the project would improve access to Shirley Canyon, which would be consistent with its use. See responses to comments F2-2 through F2-11. Also, see the Master Response regarding the mountain maintenance facility, which describes the potential for land use conflicts, including the potential for conflicts with trails (i.e., the Shirley Canyon trailhead).
- 02-22 The comment summarizes a comment letter submitted by Andrew Lange. See responses to comment letter I164.
- 02-23 See the portion of the traffic Master Response that addresses LOS standards. Also, see response to comment 09-223.
- 02-24 The comment suggests that Mitigation Measure 9-1a (traffic management on Squaw Valley Road) would be ineffective and questions the effectiveness of the three-lane coning program. As documented on page 9-56 of the DEIR, the third travel lane on Squaw Valley Road was conservatively assumed to have a 25 percent increase in the road’s overall capacity, despite resulting in a 50 percent increase in total lanes. See the portion of the traffic Master Response that addresses the three-lane coning program.
- 02-25 See the portion of the traffic Master Response that addresses significant impacts to the intersections on Squaw Valley Road and response to comment 09-223 regarding congestion standards for significant impacts.
- 02-26 The comment summarizes the significant and unavoidable impacts to Caltrans intersections that would result from the project. These are also identified in the DEIR. No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is provided here.

With respect to the comment about the DEIR not evaluating the project's impacts to mainline I-80, see the portion of the traffic Master Response that addresses I-80.

With respect to the comment about the need for a substantially reduced density alternative to reduce traffic impacts, see Chapter 17, "Alternatives," of the DEIR for a discussion of alternatives to the proposed project. As described therein, the Reduced Density Alternative would reduce the overall size of the project by approximately 50 percent; this alternative is described and evaluated on pages 17-24 through 17-31 of the DEIR. See also the Master Response regarding the Reduced Density Alternative, including a discussion of why this alternative may not be financially feasible.

With respect to enhanced transit services for the Bay Area, Reno, and Truckee/Tahoe regions, see the portion of the traffic Master Response that addresses transit service.

02-27

The comment suggests that the 2011-2012 season was not the most appropriate period for establishing the winter baseline setting. Table 9-1 in the DEIR displays skier attendance at the Squaw Valley Ski Resort during the 2010-2011 through 2013-2014 seasons. As shown, the 2011-2012 season had a skier attendance of 11,367 persons during the 5th busiest day of the season, which corresponds to the approximate design period for the study. Had any of the other seasons been used, a lower level of attendance would have been used, which would have resulted in less traffic on SR 89 and Squaw Valley Road and the potential for fewer project impacts. See also the portion of the traffic Master Response that addresses the adequacy of the project's trip generation and the portion of the traffic Master Response that addresses use of 2011-2012 ski season data to represent existing winter conditions. In particular, see Table 3-8 in the traffic master response titled "Reported Snowfall at Squaw Valley Ski Resort From 2008-2009 through 2014-2015 Seasons." As identified in the table and accompanying text, the total snowfall of 394 inches during the 2011-2012 season was five percent less than the average total snowfall of 413 inches for the seven seasons from 2008-2009 to 2014-2015, but also represented the median (midpoint) for those years. Therefore, the 2011-2012 was close to average in terms of total annual snowfall. The comment states that no snow fell between November 7 and January 22nd; however, as shown in Table 3-8, during the 2011-2012 season, there were 86 inches of snowfall in December and January (On the Snow 2015).

See the portion of the traffic Master Response that addresses underestimation of traffic volumes. For the reasons described therein, the DEIR traffic analysis is adequate and no changes to the DEIR are necessary. As such, the DEIR analyses of noise, air quality, and greenhouse gas emissions are similarly adequate and no changes to the DEIR are necessary.

The comment incorporates by reference the comments provided by Shute, Mihaly, and Weinberger (for Sierra Watch) regarding the need for additional analysis of traffic generation. See responses to comment letter O9, particularly responses O9-114 through O9-122, which pertain to traffic.

02-28

The comment incorporates by reference the comments provided by Friends of the West Shore regarding the need to address traffic impacts in the Tahoe Basin. See responses to comment letter O3, and the portion of the traffic Master Response that addresses traffic impacts in the Tahoe Basin.

02-29

See the portion of the traffic Master Response that addresses transit service. Regarding the concept of reducing project density, see the Master Response addressing the Reduced Density Alternative. Regarding the project being pedestrian-oriented, the term "pedestrian oriented" in the DEIR refers to the conditions within the proposed project that would promote walking within the facility once residents/guests/employees arrive, thereby reducing vehicle trips within and outside the facility. For example, an employment campus may be considered

“pedestrian oriented” because it provides physical infrastructure that supports walking between facilities (e.g., paths, trails), and includes amenities such as cafeterias and exercise areas so that employees do not need to generate additional vehicle trips by driving outside the campus to reach these amenities. Employees may enter and leave the campus by vehicle each day, but the campus itself is still pedestrian oriented, and reduces overall vehicle trips through this design. This internal pedestrian oriented project design is applicable to the VSVSP and achieves a reduction in vehicle trips within the project site, Olympic Valley, and outside the valley by providing lodging and amenities in close proximity to each other and providing physical infrastructure that supports walking.

The referenced list of transit services on page 5-29 of the Specific Plan is not just a “concept,” as stated by the commenter. Instead, these services are commitments included as part of the proposed project (see, for example, use of the terms such as “will” and “shall” indicating the requirement to provide these services). These services are assumed to be in place in the analysis in the DEIR (e.g., see the description of proposed circulation improvements beginning on page 9-35 of the DEIR) and the County will require implementation of these project features as a condition of project approval. It would be premature at this time, during development of a program EIR to develop some of the details suggested by the commenter, such as projected ridership goals and a detailed budget proposal and financing plan. Further, such detail is not necessary to support a program EIR as the performance criteria of providing the service is included in the EIR. Also see response to comment 09-59 regarding program level EIRs.

02-30 The comment incorporates by reference the comments provided by Friends of the West Shore regarding timing of developer participation in and fair share funding for Tahoe/Truckee regional transit services. See responses to comment letter O3, and the portion of the traffic Master Response that addresses transit service.

02-31 The comment refers to the need to provide real commitments to support transit, incentivize carpooling, and limit day skiers and resident guests trips by charging for parking. See the portion of the traffic Master Response that addresses transit service and paid parking. Also, see response to comment 09-134 regarding various trip reduction measures and limitations of train travel. Squaw Valley has also implemented, as part of current resort operations, free valet parking for any vehicle with four or more occupants, and an employee shuttle between Reno and Olympic Valley.

02-32 The comment suggests creation of a project vehicle miles of travel (VMT) reduction goal (along with monitoring and a finance plan) to demonstrate mitigation of project impacts. See the portion of the traffic Master Response that addresses the concept of a “no net new vehicle trips” threshold, as is suggested in the comment. See also the portion of the traffic Master Response that addresses transit service

02-33 See the portion of the traffic Master Response that addresses parking, which also describes recent parking demand analysis that focuses on peak day demand (rather than 1983 data).

The comment incorporates by reference the comments provided by David Stepner regarding the need for adequate parking. The commenter states that they believe the day skier population has increased substantially since 1983, but provides no information to support this assertion so no further response can be provided. See responses to comment letter I266.

02-34 The comment provides the significance criteria used to evaluate visual resources in the DEIR. These are also included in the DEIR in Section 8.3.1, “Significance Criteria.” Further, the comment states that the project would have a significant impact based on all of these criteria and the mitigation provided in the DEIR is inadequate to reduce these impacts to a

less-than-significant level. No detail regarding the perceived inadequacy of the DEIR is provided in this specific comment, but such detail is provided in subsequent comments, which are addressed below.

- 02-35 See the Master Response regarding the visual impact analysis for a discussion of viewer groups and on scenic vistas.
- 02-36 Chapter 8, “Visual Resources,” describes and analyzes the potential effect of the project on foreground, middleground, and background views. Foreground views, in particular, are specifically addressed in Impacts 8-1 through 8-3. The analysis specifically addresses the height and mass of buildings relative to existing conditions, including the existing village. Compliance with plan area development standards and obtain Design Review approval (Mitigation Measure 8-2b) is proposed to reduce the effects of the project related to degradation of the existing visual character or quality of the site and its surroundings (Impact 8-2), damage to scenic resources within a scenic highway (Impact 8-3), and potential to create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (Impact 8-5). This mitigation, in combination with others proposed in the DEIR, would reduce the impacts to visual character (Impact 8-2) and scenic resources in proximity to a scenic highway (Impact 8-3) associated with operation of the project to a less-than-significant level. Impacts to visual character (Impact 8-2) and scenic resources (Impact 8-3) during construction, as well as light and glare impacts (Impact 8-5) would remain significant and unavoidable. The rationale for these conclusions is supported in the significance conclusions provided in the DEIR. No modifications to the DEIR have been made in response to this comment.
- See also the Master Response regarding the visual impact analysis for a discussion of impacts to scenic vistas and change in character of the site.
- 02-37 See the Master Response regarding the visual impact analysis for a discussion of building heights. Note that even in the example provided by the commenter, the mountains dominate the view rather than the project buildings
- 02-38 See the Master Response regarding the visual impact analysis for a discussion of building heights. Note that the referenced views in the comment letter pertain to views from the existing Intrawest development. See also Section 2.1, “Project Modifications,” of this FEIR.
- 02-39 The text provided in the fourth paragraph on page 8-52 in Chapter 8, “Visual Resources,” of the DEIR is intended to characterize the nature of the change to the visual character or quality of the site and is part of the evaluation of operational impacts related to Impact 8-2 (Substantially degrade the existing visual character or quality of the site and its surroundings). A qualitative evaluation of several viewpoints during different seasons is provided in this discussion, which is used to build an overall analysis of the project. As indicated above, this impact is considered less-than-significant during operation following the implementation of mitigation measures because it was determined that project implementation would not substantially degrade the character or quality of the area. This applies to both summer and winter conditions.
- 02-40 See response to comment 02-39 and the Master Response regarding the visual impact analysis for a discussion of impacts to the site’s character.
- 02-41 The project was evaluated in relation to the thresholds of significance established in Appendix G of the State CEQA Guidelines and the Placer County CEQA checklist (see Section 8.3.1, “Significance Criteria,” in Chapter 8, “Visual Resources”). Views within the project site were not analyzed because these would be experienced by project site patrons who are not considered sensitive receptors of project impacts. Rather, they are part of the project.

- 02-42 See the Master Response regarding the visual impact analysis for a discussion of building heights.
- 02-43 The comment states that the SVGPLUO Design Guidelines should have been used as impact evaluation criteria in the DEIR to guide impact decisions regarding building height. The thresholds used to evaluate visual resources impacts are listed on page 8-45 of the DEIR. These thresholds are based on the Placer County CEQA checklist and Appendix G of the State CEQA Guidelines. The visual resources analysis does list and consider height restrictions included in the SVGPLUO (see DEIR page 8-44). These specific height restrictions included in the SVGPLUO would incorporate the broader design guidelines cited in the comment. Also, see the Master Response regarding the visual impact analysis for a discussion of building heights as well as Section 2.1, "Project Modifications," of this FEIR.
- 02-44 The support for an alternative with building heights limited to 70 feet is noted. See the Master Response regarding the Reduced Density Alternative and the Master Response regarding the visual impact analysis for a discussion of building heights.
- 02-45 See the Master Response regarding the Reduced Density Alternative and the Master Response regarding the visual impact analysis for a discussion of impacts from project lighting. The comment notes that lighting impacts would be reduced with a reduction in building heights. To that end, see Section 2.1, "Project Modifications," of this FEIR for a description of project changes that include an overall reduction in maximum building heights in the Village Core from 108 feet to a maximum of 96 feet, and in the Village Neighborhoods from a maximum of 96 feet to a maximum of 84 feet. The comment states that the analysis of lighting impacts focusses primarily on skyglow and not ground level impacts. This is incorrect. As indicated in the following "Significance after Mitigation Conclusion" for Impact 8-5 provided on page 8-60 of the DEIR, the impact analysis considers both nightglow and general lighting.
- While the design guidelines and compliance with Placer County codes would keep lighting to the minimum necessary to provide for safety, the project would create a new source of substantial nighttime lighting in the area and would potentially increase skyglow conditions in the area. There are no mitigation measures available that would reduce the effects of night lighting on residential areas in the vicinity of the main Village area to a less-than-significant level. Implementing standard practices and design guidelines would reduce the effect of this lighting on day and nighttime views of the area. However, residents and visitors may consider this new light an adverse change in nighttime views of the area. Therefore, this impact would remain significant and unavoidable for the main Village area.
- The significant and unavoidable conclusion provided in the DEIR is consistent with the conclusion put forth by the commenter. The comment offers the Reduced Development Alternative as mitigation to further address the impact; however, for the reasons expressed in the DEIR and the Master Response regarding the Reduced Development Alternative, this alternative would not meet the basic project objectives and would not be feasible.
- 02-46 See the Master Response regarding the visual impact analysis for a discussion of shadowing.
- 02-47 See the Master Response regarding the visual impact analysis for a discussion of shadowing and consistency with the design guidelines. Also, see Section 2.1, "Project Modifications," of this FEIR for a description of project changes that include an increase in building separation as well as redesign and expansion of plaza areas and courtyard of buildings 1-A and 1-B. It is unclear what existing parking area referenced in the comment would be shaded by the proposed project. There is also no indication that this shading would occur during a

substantial part of the day, thereby triggering the significance criteria. Therefore, no further response related to this item is provided. Regarding shading of the central plaza included in the proposed project, an EIR need not evaluate the effects of a project's shading on itself. The amount of shade within the project site is a project design issue and not an environmental effect of the proposed project. Just as the shading of the lower level of a parking structure by the upper level is not an issue suitable for an EIR analysis, shading of one part of a project site by a facility on another part of the project site is not an issue that need be addressed in an EIR. Although existing residents may use the central plaza, they are not forced to, and are not exposed to an adverse environmental effect because the plaza is not as consistently sunny as the surface parking lot currently on the site. The County has discretion in what thresholds of significance to use for purposes of preparing an environmental document and determining whether significant adverse environmental impacts would result.

- 02-48 See the Master Response regarding the Reduced Density Alternative and the Master Response regarding the visual impact analysis for a discussion of shadowing. See also Section 2.1.1 and Exhibit 3-5 of this FEIR pertaining to project changes.
- 02-49 See the Master Response regarding the visual impact analysis for a discussion of shadowing and building heights.
- 02-50 As indicated on in Chapter 3, "Project Description," of the DEIR (page 3-11), parking structures on Lots 11 and 12 would consist of one level of structured parking over surface parking; the deck height of the structured parking would be approximately 14 feet, with railings and architectural elements extending to 20 feet and 30 feet, respectively. This element of the project was evaluated in the impact analysis at a programmatic level. Although not specifically addressed, the height, massing, design of all proposed structures were considered in the analyses.

With respect to scenic vistas (Impact 8-1), impacts were identified because (1) views of the mountains would be partially obstructed and (2) the project would result in a continuation of long-term development trend within an overall highly scenic area. Mitigation related to the location of free standing parking structures would not reduce these impacts because other buildings in the Plan Area would be taller than the parking and the level of development proposed would be the same. With respect to views of scenic resources from Squaw Valley Road (Impact 8-2), significant impacts were identified due to the potential for the design of new buildings to not present a unified architectural style that is consistent with the natural setting. Mitigation related to the location of free standing parking structures would not reduce these impacts. No changes have been made to the DEIR in response to this comment.

The analysis in the DEIR did not conclude that replacing existing surface parking lots with 30-foot parking structures would result in a substantial effect on a scenic vista. This effect would result from the taller proposed buildings.

- 02-51 The comment states that groundwater drawdown and water quality impacts to stream, meadow, fish, and riparian vegetation are underestimated in the DEIR. This comment provides a summary of detailed comments provided below. See the Master Response regarding water supply, and detailed responses to comments 02-52 through 02-55.

The DEIR discusses existing water quality in Squaw Creek on pages 13-25 through 13-29, including sediment levels (see Table 13-6), and, on page 13-33, the listing of Squaw Creek as "impaired" by the Lahontan Regional Water Quality Control Board. The potential effects of increased groundwater withdrawal are analyzed in Impacts 6-1 and 13-5 with consideration of the existing impaired nature of the creek. As stated on page 6-46 of the DEIR, the loss of

some riparian or meadow habitat along the higher elevation edges of the Squaw Creek channel or within the meadows could result in streambank instability, which could contribute to increased erosion and sedimentation. Mitigation Measure 6-1c in the DEIR requires that the locations where this could occur should be monitored and, if groundwater declines are shown to result in the loss of riparian or meadow habits, the losses must be compensated for or otherwise corrected (see page 6-49). This measure would protect water quality from increased sedimentation due to groundwater withdrawals. In addition, as stated in Impact 13-6, the proposed Squaw Creek restoration would contribute to achieving TMDL goals of reduced sediment delivery to the downstream meadow (see page 13-76 of the DEIR). Note that Mitigation Measure 6-1c has been further refined as shown in Section 2.3 of this FEIR titled "Revisions to the DEIR."

Also, see response to comment O8a-20.

02-52 The DEIR addresses impacts to fish and benthic invertebrates from stream flow drawdown, creek bed drying, loss of riparian plants, and resultant potential for erosion in Impact 6-13 (Potential long-term impacts to fish and aquatic resources related to increased groundwater extraction, changes in groundwater elevations and flow directions, resulting changes to surface water flow, streambed drying, and off-site channel stability) beginning on page 6-78. The summary of the impact describes this analysis as inclusive to the issues requested by the commenter:

The Specific Plan development will rely on groundwater as its primary water source, and the increase in total extraction, along with continued and increased pumping in existing and new wells, particularly near the stream corridor, could reduce groundwater support to streamflow and surface water elevations and/or expand the spatial extent of dry streambed and/or the duration of zero flow within and downstream of the main Village area. Although flow changes may occur, they would be minor in the specific context of hydrology and would have little effect on water quality. However, if the wellfield is not properly managed, vegetation loss could occur in the Squaw Creek corridor, leading to potential erosion and adverse impacts to fish and fish habitat [including benthic invertebrates]. This impact would be potentially significant.

02-53 As described on page 3-38 of the DEIR, the restoration of Squaw Creek would be completed by the recordation with the County of the Final Map that includes the 600th bedroom, which would be at approximately 40 percent of total project development. To have the restoration complete by this time, restoration activities would need to be initiated well before this point. Policy 6.A.11 states that a project proponent is required to restore areas as part of development activities. This restoration is part of the development planning and the plan document, and is consistent with the policy because it is part of the planned development activities. The policy does not state a requirement for the timing of the restoration and therefore, the planned timing of the restoration is not inconsistent with Policy 6.A.11.

02-54 The comment states, "In just the last four consecutive drought years, we have witnessed the western portion of the creek to dry up earlier (temporally) and longer (spatially) which is not incorporated into the model." See the Master Response regarding water supply and Section 2.2, "Updated Water Supply Assessment and Groundwater Data," of this FEIR regarding incorporation of additional more recent data into the groundwater model.

02-55 The comment relates to the Squaw Valley Public Service District (SVPSD) groundwater model that was used as a tool for analyzing groundwater conditions in the future, and notes that the model is not calibrated to measured stream flows. There are only three gages measuring stream discharge in Squaw Creek; one each on the North and South forks where they enter the Valley floor and one on the main stem of the creek at the eastern end of the meadow.

Measured streamflow discharge rates from the two upstream gages are used as inputs for streamflow in Squaw Creek in the groundwater model. While these stream discharge data provide valuable model inputs, they are not sufficient for calibrating streamflow in the groundwater model. Calibration of streamflow would, at the minimum, require monthly measurements of flow at numerous points along the creek plus measurements of inflow from tributaries. It should be noted that the existing three gages were installed only in 2004 and accordingly, do not provide data for the first twelve years of the modeling period. While the model is not calibrated to streamflow, it is well calibrated to measured groundwater elevations within Squaw Valley. The model is a groundwater model that was used appropriately to simulate groundwater elevations for analysis in the DEIR.

The comment also states that the model only assesses up to one foot above the streambed. This statement is incorrect. The model simulates groundwater elevations up to the top of the aquifer, which is coincident with ground surface. The graphs presented as Exhibits 13-23 through 13-27 of the DEIR and in the Fisheries and Aquatic Resources report prepared by Garcia and Associates (GANDA 2014) show groundwater elevations more than a foot higher than the streambed, these graphs show that in many locations groundwater elevations are frequently up to eight feet above the streambed. Thus, the model is not limited to simulating groundwater conditions within one foot above the streambed.

02-56

The comment states that groundwater drawdown and water quality mitigation measures proposed in the DEIR do not adequately avoid significant impacts to stream, meadow, fish, and riparian vegetation. The comment then summarizes the DEIR analysis of these impacts, which were determined to be less than significant following mitigation. The comment disagrees that Mitigation Measure 13-4 would assure mitigation of biotic impacts below the significant level for the reasons described below and in comments 02-57 through 02-58.

The first reason provided by the comment is that Mitigation Measure 13-4 focuses solely on operational pumping controls (mainly adhering to a 65 percent saturation safe rate) to protect groundwater levels. The 65 percent saturation threshold is intended to ensure that water supply is adequate. This standard is not meant to address impacts on water quality and biological resources. Mitigation Measure 13-4 includes an additional threshold to address impacts on fish, specifically see A.ii. on page 13-64, as well as Mitigation Measure 6-1, which requires monitoring of vegetation along the creek and corrective measures if groundwater pumping results in loss of meadow or riparian habitat. Therefore, mitigation in the DEIR requires monitoring of potential physical ground surface effects of groundwater pumping (e.g., pool drying, vegetation survivorship), provides criteria to assess monitoring results, and provide corrective actions if significant adverse effects occur. The mitigation does not rely solely on well saturation levels as a monitoring or success criteria. See also response to comment 02-51.

02-57

The comment addresses the handling of future climate change in the WSA that is referenced in the DEIR. Limited information exists on how climate change will affect precipitation patterns in Squaw Valley. As such, the future model simulations repeated past observed hydrologic conditions to simulate recharge and streamflow volumes and timing. While insufficient detail exists on climate change to simulate in the numerical model, climate change was considered and relevant information regarding predictions for future climate change and the relationship between precipitation in the watershed and groundwater recharge was discussed in Section 7 of the WSA. The WSA references available studies that have quantified changes in future precipitation in the Sierra Nevada Mountains and the Tahoe Basin. The analysis in the WSA concludes that even the most conservative estimates of annual runoff reduction have a limited effect on the availability of potential recharge to the Basin. However, the mechanisms and timings of recharge in the Basin are complex and while total annual potential recharge is important, it is not the sole factor in groundwater water

supply availability. Also, see Section 2.2, "Updated Water Supply Assessment and Groundwater Data," in this FEIR.

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

02-58

A Basin-wide trigger based on hydrographic conditions would not be necessary to address the potential impacts of the proposed project and cumulative groundwater pumping, and would not necessarily reflect the conditions in which fish, vegetation, and bank stability could be affected. As stated on page 6-46 of the DEIR, the extent to which groundwater declines could affect streambank stability would depend, in part, on location. In areas where groundwater levels are already well below root zones, for example, further reductions would not affect the viability of vegetation. Groundwater pumping is not anticipated to result in declines that would affect vegetation beyond the areas closest to the well field, represented by East Cells A through E (see page 6-44 of the DEIR and Exhibit 13-22). Precipitation levels in a particular year, the duration of groundwater declines and other factors can also affect vegetation viability. Changes in bank stability would depend on existing streambank heights, angles and composition. Mitigation Measure 6-1c would provide for protection of vegetation and water quality by monitoring the area that could be affected, and requiring corrective measures to be taken if degradation due to groundwater pumping occurs.

The comment that a predetermined and agreed upon plan to reduce or stop groundwater extraction to ensure the speed and effectiveness of response if problems arise implies that impacts associated with groundwater withdrawals could occur very rapidly. However, groundwater pumping levels will increase incrementally over time as new development occurs. As shown in Table 14-8 in the DEIR, water demand is estimated to increase by 108 acre feet per year (AFY) over the first five years, or approximately 13 percent of current levels. Full buildout is expected to occur over 25 years. Therefore, the full effects of groundwater withdrawals will not be experienced for 25 years. Therefore, a trigger for rapid response is not necessary. Nonetheless, monitoring of conditions in the areas that could be affected will occur as groundwater pumping increases are initiated. Furthermore, as indicated in the discussion of Mitigation Measure 13-4 (on pages 13-63 through 13-65 of the DEIR), ongoing and iterative processes would be involved in groundwater planning, including incorporation of new data as groundwater withdrawals increase, which would guide installation and operation of new groundwater wells.

General Plan Policy 6.A.4.f does not apply to aquifers. Rather, it applies to stream protection zones. Regarding the funding of ongoing studies, Mitigation Measure 13-4b requires that the Development Agreement between the SVPSD and the project applicant specify the process and funding responsibility for updating existing or future groundwater plans as needed to address new wells and/or changes to the proposed well field.

Placer County is the lead agency for the VSVSP, and as such, is responsible for ensuring the implementation of mitigation measures adopted for the VSVSP, and would be the lead agency for all land use entitlements related to the VSVSP. It is anticipated that Placer County and the applicant would enter into a Development Agreement as part of the VSVSP approvals. A Development Agreement must specify the duration of the agreement, the permitted use of the property, the intensity of use, the maximum height and size of proposed buildings and the provisions for reservation or dedication of land for public purposes (California Government Code Section 65865.1). Additional items that may be included are

conditions, terms, restrictions, and requirements for subsequent discretionary actions, and terms and conditions relating to applicant financing of public facilities and subsequent reimbursement. A Development Agreement does not address implementation of all mitigation measures, which is the purview of the Mitigation Monitoring and Reporting Program.

As the agency responsible for providing water supply to the proposed VSVSP, the SVPSD will also enter into a development agreement with the applicant, which will address issues specific to the implementation and financing of water infrastructure and other services to be provided by the SVPSD (e.g., sewer).

The suggestion that an oversight committee be established to evaluate monitoring results does not address the environmental effects of the project, but will be forwarded to the decision makers for their consideration. Also, it should be noted that monitoring results will be part of the public record regardless of whether an oversight committee is established.

California Code Government Section 65451 requires text and diagram(s) that specify, among other items, the proposed distribution, location and extent and intensity of major components of public and private essential facilities, including water. The VSVSP meets this requirement by describing the water supply and distribution facilities on pages 6-3 and 6-5 and in Figure 6.1. In addition, a Water Master Plan has been prepared for the VSVSP (MacKay & Soms 2014). As required by Section 65451(4), implementation measures are provided in Chapter 8 of the VSVSP. Section 65451 also requires standards and criteria for conservation, development, and utilization of natural resources, where applicable, which are provided in Chapter 7 of the VSVSP. Section 65451 does not require that mitigation implementation programs be included in a Specific Plan.

For a discussion of deferral of mitigation, see response to comment 09-49.

Also, see response to comment 08a-4c for a discussion of the hydrographs prepared for the DEIR analysis.

- 02-59 See response to comment 02-58 and the Master Response regarding water supply for a discussion of irrigation demand. See also response to comment 02-58.
- 02-60 The comment states that snow storage mitigation is inadequately addressed in the DEIR. The comment then summarizes the existing Village snow storage sites, as described in the DEIR. See responses to detailed comments 02-61 through 02-64.
- 02-61 The VSVSP includes a program for snow storage and removal described in the DEIR on page 3-28, shown in Exhibit 3-14, and analyzed for its effectiveness under Impact 14-5. Additionally, Impact 13-7 in the DEIR analyzes long-term management of runoff volumes, peak flows, and snow storage, and risks of potential degradation to water quality.
- 02-62 The comment states that the DEIR does not provide enough detail to ensure no reduction of long-term water quality degradation from snowmelt and runoff from the East Parcel. The storm water quality infrastructure strategy for the East Parcel is consistent with the Village strategy found in the Squaw Valley Storm Drainage Master plan Dated October 16, 2014. The East Parcel will use two independent water quality systems to treat storm water runoff and snow storage snowmelt runoff.
1. Storm drainage water quality system for the parking lot will feature sedimentation traps and hydrodynamic separators. These treatment devices will allow for infiltration and sediment and nutrient removal prior to discharging into surface receiving waters.

2. Snow storage water quality system will include designated snow storage areas located on the perimeter for the East Parcel that will feature sediment traps and hydrodynamic separators to collect and treat snow melt runoff. These treatment devices will allow for infiltration and sediment and nutrient removal prior to discharging into surface receiving waters.

Also, as stated on page 13-42 of the DEIR, all project-related stormwater discharges are subject to all applicable requirements of the Placer County Stormwater Management Program, which is in compliance with a NPDES Phase II (“Small MS4”) municipal stormwater permit (SWRCB NPDES General Permit No. CAS000004, Board Order 2003-005-DWQ). Appropriate standard stormwater treatment measures and BMPs must be implemented to meet the discharge requirements of the Small MS4 permit.

02-63 As indicated in the DEIR on page 3-28, offsite snow storage is only retained as an option, and would be expected to be used only under extreme circumstances (very heavy snowfall years), due in large part to the cost associated with such an approach. The VSVSP includes a program for snow storage and removal described in the DEIR on page 3-28, shown in Exhibit 3-14, and analyzed for its effectiveness under Impact 14-5. If off haul is required, no groundwater affects would be expected; again, this would only occur during a heavy snowfall year when groundwater recharge would be robust. Further, the amount of snow removed for storage offsite, if required, would be expected to add a very minor amount of snow to any watershed in which it is placed. Any potential impact would be expected to be insignificant in terms of overall runoff from a watershed.

02-64 The comment states that detailed snow storage runoff analysis, as well as new analysis of snow storage options that do not jeopardize drinking water wells, the creek, or transport critical water/snow out of the watershed is needed before the Specific Plan is approved. However, for the reasons discussed under responses to comments 02-61 through 02-63, the analysis is adequate and no changes to the DEIR are necessary.

02-65 The comment states that the fractional cabin area key recharge zone should remain undeveloped and more extensive mapping and understanding of recharge is needed. The DEIR includes an analysis of the potential effects of project development on groundwater recharge in the discussion of Impact 13-4 beginning on page 13-52 of the DEIR. The entire main Village area, including Lots 16 and 18, is considered in the analysis, as indicated in Exhibit 13-16 on page 13-54 of the DEIR. The area between 6,300 and 6,400 feet elevation, the focus of the comment, currently contains 82.03 areas of land within and outside of the project area, of which 4.33 acres is currently impervious. After project development, 4.51 acres would be impervious, an increase of 0.18 acre (0.2 percent of the area between this elevation band; see Exhibit 13-16). This change would occur at the 6,300-foot contour, where the edge of several lots would be located. The fractional cabins would not be located above 6,350 feet, as stated in the comment A water tank (approximately 0.25 acre) is proposed between 6,400 and 6,500 feet elevation (this is 0.3 percent of the 99.2-acre area in this elevation band within the project area). There would be virtually no change in the recharge area and therefore no impact to recharge in this area.

For the reasons described in the DEIR, the effects on groundwater recharge and the aquifer from the proposed development of impervious surfaces are considered less than significant. Also see response to comment I241-9.

The discussion of low impact development (LID) applications has no bearing on this conclusion as the minimal increase in impervious surface is sufficient to conclude that the impact would not be significant and mitigation is not needed. Incorporation of LID management practices, and the increased potential for groundwater infiltration relative to

standard construction practices, would be expected to simply further reduce a potential effect that is already less than significant.

02-66 The comment states that the DEIR has inadequately analyzed or omitted important recharge studies. See response to comment 02-65. Moreover, the proposed project, as described on page 13-53 of the DEIR, would result in an overall net increase, over the entire Village site, of 0.25 acre of impervious area. As a reminder, the project site is currently largely an asphalt parking lot. While there would be the addition of impervious surfaces in some areas, in other areas of the site, facilities and imperious surfaces would be removed. As described on page 13-53 of the DEIR, the potential displacement of groundwater from installation of subsurface facilities is also addressed and it is projected that a total of between 0.061 percent and 0.078 percent of groundwater storage (2.8 acre-feet of total 3,600 to 4,600 acre-feet of available storage) would be removed by installation of a proposed underground parking facility. Regarding the comment that the entire groundwater map, from ridge to ridge is not shown, while this may be interesting information, it would have no bearing on whether the project would affect recharge or groundwater storage as potential project effects relative to these topics do not extend beyond the project boundary. Regarding the comment on Mitigation Measures 6-1c and 13-4, see response to comment 02-56. The mitigation approach does not rely solely on meeting operational parameters to ensure mitigation success.

02-67 The comment states that impacts to Squaw Creek as a result of proposed restoration plans defer too much analysis of impacts onto further study, referencing Mitigation Measures 6-1a and 6-1b. A detailed creek restoration plan will be prepared with input from responsible and trustee agencies and is not required at this time, in part, because detailed performance standards and criteria are included in Mitigation Measures 6-1a and 6-1b. Mitigation Measure 6-1a, for example, directs the applicant to complete the Clean Water Act Section 404 permitting process prior to initiating creek restoration activities; identifies many of the standard practices/steps associated with this common permitting process; requires coordination with the County and other agencies as part of more detailed restoration planning; provides performance criteria for the restoration (minimum 1:1 impact to mitigation ratio); and then sets further standards regarding monitoring, funding, and other aspects of the creek restoration. Much of the text in Mitigation Measure 6-1a reflects standard practices for ensuring proper future implementation of habitat restoration activities, and several bullet items repeat text directly from the Placer County ordinances addressing this topic. Similar conclusions are true for Mitigation Measure 6-1b, with the primary difference being that where Mitigation Measure 6-1a focusses on the USACE Clean Water Act permitting process and mitigation measures for wetlands, Mitigation Measure 6-1b focusses on the CDFW Streambed Alteration Agreement process and mitigation for riparian habitats. Mitigation Measures 6-1a and 6-1b, and the permitting process associated with these Mitigation Measures provide sufficient assurances that sufficient creek restoration will be implemented to fully compensate for effects to wetland and riparian habitats.

Regarding the timing of implementation of Squaw Creek restoration and consistency with General Plan Policy 6.A.11, see response to comment 02-53.

02-68 The comment contends that the requirements of Placer County General Plan Policy 4.A.2 have not been met “because the Specific Plan does not provide detailed public facility master plans nor an adequate Financing Plan.” Policy 4.A.2, which is provided below, sets forth conditions that must be met before the County approves new development. Pursuant to this policy, Placer County staff would review plans for each development phase as they are submitted to the County, and would only grant approval of the plans if they include adequate public facilities and services. The development review process would occur subsequent to this programmatic CEQA review. For the purpose of the CEQA analysis, and based on the

information available in the VSVSP, it is assumed that these requirements would be fulfilled. The commitments made in the VSVSP, as analyzed in the DEIR, would have to be implemented for the project to be consistent with the EIR. Subsequent changes to the project would be evaluated by Placer County to determine if additional analysis under CEQA would be required.

- ▲ **Policy 4.A.2.** The County shall ensure through the development review process that adequate public facilities and services are available to serve new development. The County shall not approve new development where existing facilities are inadequate unless the following conditions are met:
 - a. The applicant can demonstrate that all necessary public facilities will be installed or adequately financed (through fees or other means).
 - b. The facilities improvements are consistent with applicable facility plans approved by the County or with agency plans where the County is a participant.
 - c. The facilities improvements are designed and built to the current standards of the agency providing service.

See also response to comment O2-66. The adequacy of the VSVSP will be determined by Placer County when the plan is considered for approval. This action is separate from certification of the EIR (as defined in Section 15090 of the State CEQA Guidelines). However, note that the proposed distribution, location, and extent and intensity of proposed public services and utilities are provided in the VSVSP (for example, see Figure 6.1– Conceptual Utilities Plan - Water on page 6-4, Figure 6.2– Conceptual Utilities Plan - Wastewater on page 6-7, Figure 6.3– Conceptual Utilities Plan - Drainage on page 6-8, and Figure 6.5– Parks and Recreation Plan on page 6-18). Also, as noted in the comment, the VSVSP does include financing measures necessary to carry out the plan. California Government Code Section 65451.a.4 states only that “financing measures necessary to carry out paragraphs (1), (2), and (3)” must be included and does not speak to the specificity of these measures.

Further, where the DEIR concluded that there would be a potential for limited capacity of existing utilities to serve development, mitigation measures are proposed that tie project approvals with provision of utilities. For example, Mitigation Measures 14-1c and 14-2b require submittal of will serve letters for review and approval by Environmental Health Services before Improvement Plan approval. To ensure that there is sufficient funding and resources to maintain desired fire department response times, Mitigation Measure 14-7b requires the project applicant to enter into a development agreement with SVPSD. The agreement will contain defined benchmarks for staffing, facilities, and equipment at various phases of project development. Also included in the development agreement will be the provision for project applicant support of a new fire substation in the western Olympic Valley area and the condition that by the time 50 percent of any combination of the condo hotel units has been built, SVFD will have the fire substation in place and active. A copy of this agreement must be provided to Placer County prior to approval of the initial Small Lot Tentative Map.

As discussed on page 14-43 in Chapter 14, “Public Services and Utilities,” of the DEIR, the project must also comply with Placer County’s parks and recreation policies and ordinances through dedication of parkland, construction of park and recreational facilities, and/or payment of in-lieu fees. A plan for complying with park standards would be submitted to the County with each small lot map and approved concurrent with recordation of a final small lot map. By constructing and/or dedicating recreational facilities, and/or paying Quimby Act fees, the project would meet its obligation to address the increased demand for parks and recreational facilities.

Finally, the comment indicates that the EIR should evaluate the financial feasibility of the proposed public facilities and services. CEQA is intended to evaluate whether proposed actions would have an adverse impact on the environment; there is no requirement to analyze the financial feasibility of the project. With regard to public services, impacts under CEQA may be associated with the physical effects of construction of new public facilities that would be necessary maintain acceptable service ratios. With regard to public services, impacts under CEQA may be associated with the physical effects of construction of new water, wastewater, or storm water facilities; new entitlements for water supply; lack of adequate capacity at the wastewater treatment plant or landfill. Therefore, no changes to the analysis in the DEIR have been made in response to this comment.

02-69

Regarding the proposed location, financing, and timeframe for construction of a new fire station, see responses to comments 09-13 and 09-278 and responses to comment letter LL1.

02-70

The comment states that while the DEIR correctly concludes that Impact 7-1 (Demolition of historically significant buildings) will result in a significant unavoidable impact, they believe that this impact is avoidable. The comment states that preservation of these buildings should be considered viable alternatives, similar to the Reduced Density Alternative, and that it is up to the developer to explain in detail and with specific financial estimates why these buildings cannot be preserved. Chapter 17, "Alternatives," of the DEIR, discusses the Preservation of Historical and Wetlands Resources Alternative beginning on page 17-35. This alternative would preserve the Olympic Valley Lodge (formerly Athlete's Center) and the Far East Center (formerly Nevada Spectator's Center), both of which are potentially significant historical buildings that would be demolished under the proposed project. The discussion concludes that this alternative would attain many of the project objectives, but not to the extent that the proposed project would. This alternative might not meet the project objective related to providing a resort with sufficient size and services to be on par with peer world class North American ski destinations and that is economically sustainable. See the Master Response regarding the Reduced Density Alternative for a discussion of the financial feasibility of alternatives. Ultimately, the decision to approve the project as proposed, modified, or as considered in an alternative evaluated in the EIR is the province of the Placer County Planning Commission and Board of Supervisors.

The comment also stated that State Historical Designated Site No. 724, Pioneer Ski Area, is not mentioned in the DEIR. The comment is correct that the historical landmark is not mentioned in the DEIR. As a "Pioneer Ski Area," Squaw Valley is designated as a California Historical Landmark for its role in the VIII Olympic Winter Games of 1960, which commemorated a century of sport skiing in California beginning in 1860. The reason for the designation, the Winter Olympics of 1960, is best expressed by the remaining 1960s Olympic-related buildings (the Olympic Valley Lodge and the Far East Center). This is further explained in response to comment 09-200.

As discussed above and described in Chapter 7, "Cultural Resources," of the DEIR, the historic significance of these buildings were evaluated using NRHP and CRHR criteria. Impacts to historic resources, including the 1960s Olympics-related buildings, have been adequately addressed in the DEIR under Impact 7-1 and mitigation measures have been provided. Even with mitigation, the loss of these historic resources was found to be significant and unavoidable.

02-71

See the Master Response regarding noise. Regarding the statement that the importance of this significant impact is dismissed because of its relative infrequency, the County respectfully disagrees. Rather, in spite of the relative infrequency, the DEIR used a very conservative approach, as explained in the Master Response, which resulted in labeling this impact as significant. New mitigation has been added to address this impact.

- 02-72 See the Master Response regarding the noise, which includes a new measure that is capable of reducing this impact to less than significant.
- 02-73 See the Master Response regarding noise.
- 02-74 See the Master Response regarding noise.
- 02-75 See the Master Response regarding the Reduced Density Alternative and the Master Response regarding noise.
- 02-76 The comment addresses issues associated with population assumptions and occupation rates. See the Master Response regarding occupancy assumptions for a discussion of peak overnight population. For the reasons discussed in this Master Response, no new or revised calculations are needed.
- 02-77 The comment finds that the project is not consistent with the Placer County General Plan and the SVGP. Consistency with the Placer County General Plan and SVGP is described under Impact 4-2. As summarized on page 4-21 of the DEIR:

The plan area is located within Squaw Valley (also known as Olympic Valley) in northeastern Placer County. With approval of the proposed policy amendments and implementation of the proposed development programs that are a part of the proposed project, the project would be consistent with relevant *Placer County General Plan* and SVGPLUO policies. Moreover, although a General Plan amendment is needed, the project and its programmed land uses and development standards would be consistent with the overall anticipated land uses, including density, and policy framework of the *Placer County General Plan* and the SVGPLUO. The proposed Specific Plan land use designations would be consistent with the land use designations of the *Placer County General Plan* and the SVGPLUO with approval of the proposed rezone. Conflicts would not occur if the Specific Plan is approved and implemented because land use policies for the plan area are predominantly consistent with existing *Placer County General Plan* and SVGPLUO policies, and minor adjustments to existing policies and reorganization of where land uses would occur would achieve consistency. Therefore, no conflicts with the overall intent of relevant plans, policies, or zoning would occur and this impact would be **less than significant**.

Because the comment does not address any environmental impacts associated with the project, or otherwise address Impact 4-2, no further response can be provided.

- 02-78 The comment states, “the DEIR concludes that air quality impacts can be mitigated below the significant level by using measures outlined in the adopted regional air quality management plan.” It is assumed that the comment refers to the analysis of long-term, operation-related (regional) emissions of criteria air pollutants and precursors discussed under Impact 10-2 because this is the only impact in Chapter 10, “Air Quality,” that identifies a significant impact, requires mitigation, and concludes that the mitigation would reduce this impact to a less-than-significant level. The next sentence in the comment states, “However, the DEIR failed to address the health risks of construction period emissions in the short term as well as over a 25-year buildout period.” It is assumed that this sentence is about Impact 10-4, which discusses the level of exposure to toxic air contaminants (TACs) from project construction (and operations). The analysis of construction-generated TACs under Impact 10-4 accounts for the fact that construction would occur over a 25-year buildout period. The analysis also accounts for other factors, including the relatively low mass of TAC emissions that would be generated during even the most intense season of construction, the relatively short duration of construction activities seasonally and within specific portions of the plan

area, the distance to the nearest off-site sensitive receptors, the transient occupancy characteristics of most sensitive receptors, and the highly dispersive properties of diesel PM.

The comment then refers to a letter prepared by Shute, Mihaly, and Weinberger on behalf of the Sierra Watch. See responses to comments 09-135, 09-136, 09-137, and 09-139 for more discussion about the TAC analysis.

The commenter again asserts that the DEIR underestimated trip generation and projections of VMT by the proposed project and that this underestimation results in an underestimation of air quality impacts. See the Master Response regarding traffic for discussion about the level of VMT estimated for the project.

- 02-79 The comment summarizes the comments concerning the DEIR's analysis of project-related greenhouse gas (GHG) emissions in a letter submitted by Shute, Mihaly, and Weinberger on behalf of the Sierra Watch. See responses to comment letter 09, specifically responses to comments 09-140 through 09-165 pertaining to GHG emissions and climate change. Also see the Master Response related to GHG emissions.
- 02-80 The DEIR contains a reasonable range of alternatives (see response to comment 09-298). The specific alternatives requested by the commenter are addressed in responses to comments 02-81 through 02-92.
- 02-81 The comment requests a new alternative that combines the Reduced Density Alternative described on pages 17-24 through 17-27 of the DEIR with the additional design features described in comments 02-83 through 02-91. For a discussion of each of these, see responses to comments 02-84 through 02-91.
- 02-82 The comment requests the addition of another alternative that reduces the number of bedrooms to 400, or approximately 27 percent the number of bedrooms provided by the proposed project. As stated on page 17-25 and 17-26, the Reduced Density Alternative, which would reduce project development by 50 percent, may not be economically sustainable or be able to sufficiently fund infrastructure improvements, public services or other municipal costs. Furthermore, 400 bedrooms within the plan area would be well below the density for the Village area envisioned by the SVGPLUO. The Village Commercial zoning allows for up to 50 bedrooms per acre (SVGPLUO page 88). If all the 400 bedrooms suggested in the comment were constructed on the 53 acres currently zoned Village Commercial in the plan area, the density would be only 7.5 bedrooms per acre, which is even lower than the maximum of 10 bedrooms per acre allowed for Low Density Residential (SVGPLUO page 95). CEQA does not require consideration of every combination of alternatives. Rather, it requires a range upon which a reasoned decision can be made. The EIR accomplishes this. Further, see the Master Response regarding the Reduced Density Alternative regarding a range of reasonable alternatives.
- 02-83 See responses to comments 02-84 through 02-92.
- 02-84 As stated on pages 17-28 and 17-29 of the DEIR, the Reduced Density Alternative would provide additional flexibility with the location and size of project buildings. Therefore, as suggested in the comment, building heights could be limited to 70 feet. Nonetheless, the overall visual effect would be similar in nature to the proposed project, because there would be a number of new buildings in areas that are currently parking lots or undeveloped. Thus, the suggestion to further limit building heights would not avoid or substantially lessen the significant aesthetic impact. As can be seen in the photo simulations provided in Chapter 8, "Visual Resources," of the DEIR, even if the number of buildings and/or building heights were reduced, new development would still be visible from key view points, and would substantially alter the visual character of scenic views and/or the plan area. The extent of

impacts may be reduced somewhat in close-up views, particularly views from the existing Intrawest Village development, but the impacts would be virtually the same and indistinguishable from more distant viewpoints; visual impacts from more distant locations would be reduced more by limiting the number/mass of buildings than their proposed height.

See the Master Response regarding the visual impact analysis for a discussion of visual impacts and building heights.

02-85

See the Master Response regarding the MAC for a discussion of eliminating the MAC. Note that the comment includes a typographic error in reference to the height of the MAC (1098 feet). Also, see Chapter 2.1 of this FEIR.

The comment also refers to a statement in the SVGPLUO that, within the Village Commercial District, “commercial and tourist residential uses are encouraged to be provided within the same structure” (see SVGPLUO, page 85), and suggests that most potential MAC facilities could be integrated into the Village proper, better meeting the vision for the Village as an interesting, pedestrian oriented, mixed use area.

The comment does not provide the full text of the SVGPLUO discussion of commercial and tourist residential uses. The SVGPLUO introduces the Village Commercial District with the following statement:

The intent of creating a “Village Commercial” land use district is to allow for and guide the development of an environment that will be interesting to people on foot, that would promote interaction between people, and that would remove or reduce pedestrian competition with the automobile. As the focal point of a destination ski resort, development occurring within this district must be equally oriented to the ski hill and the major pedestrian/vehicular access points. Commercial and tourist residential uses are encouraged to be provided within the same structure. The area so designated in the Squaw Valley General Plan has strong potential for complementary development, attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area.

It is the intent of these regulations to preserve existing attractions in this district and to encourage new cultural and recreational facilities as well as hotel, restaurant, commercial and office uses. (SVGPLUO, pages 84 and 85).

The project as proposed meets the intent of this section of the SVGPLUO. By placing parking in structures within buildings and/or the parking garages at the edge of the plan area, the Village itself would be pedestrian friendly and almost eliminate the potential for pedestrian conflicts with automobiles. The setbacks and pathways provided throughout the Village, as shown in Exhibit 3-16 of the DEIR and Appendix B of the Specific Plan, would provide an interesting pedestrian environment. The orientation of the larger hotel/condo buildings would be toward the ski area, with lower profile residential/lodging buildings and cabins located farther from the busier portions of the resort. Pedestrian circulation would connect these areas. The hotel/condo buildings would include some commercial and recreational uses, and recreational amenities would be provided both in the MAC and throughout the Village. The VSVSP would serve those who use the existing attractions (e.g., skiers and hikers) and provide a new attraction with the MAC. By creating a year-round amenity, the VSVSP would promote the social and economic vitality of the entire area.

02-86

Limiting the construction period to 10 years would not necessarily reduce project impacts. As discussed in the Master Response regarding the 25-year construction period, the timing of development will be driven by market conditions, and buildout could occur over 25 years. This does not mean that construction would occur every year or year round every year for 25

years. Rather, there will be little or no construction in some years, and more intensive construction in other years. In some periods, construction may be ongoing primarily within building interiors, and therefore not result in noise and other construction impacts. If all construction were to be complete within 10 years, it would not reduce the magnitude of the construction impacts, but simply compress them into a shorter period.

The comment implies that some level of development less than the full VSVSP would be allowed within the 10-year period, and that subsequent levels of development would require additional review and approval. This approach would not be consistent with approval of the VSVSP as a single project, which is fully analyzed in the EIR. Nor are the “benchmarks” that would be used identified in the comment.

However, the Reduced Density Alternative, which would permit 50 percent of the project development, would, if it followed a similar schedule as the project, be completed in 12 to 13 years (half of 25 years), so this alternative provides a scenario that includes evaluation of impacts that may be proximate to what may be envisioned by this comment.

For a discussion of the balance of uses, see response to comment O2-8.

- 02-87 See the portion of the traffic Master Response regarding transit services.
- 02-88 As discussed on page 13-53 of the DEIR, the project, including the fractional cabins, would not increase impervious surfaces enough to interfere with recharge of the aquifer. See response to comment O2-65. Because the impact on recharge would be less than significant (not significant and unavoidable as indicated in the comment), there is no reason to address this issue in an alternative as it would not avoid or substantially lessen a significant impact of the project.
- 02-89 The creek restoration would be implemented as part of the VSVSP, and could provide mitigation for impacts on wetlands and other biological resources. See response to comment O14-2 regarding timing of creek restoration. Advancing the creek restoration to the first phase of project construction would not reduce the effects of project buildout, nor residual wetlands impacts (they would be mitigated, at the latest, as impacts occur), and therefore need not be considered as an alternative.
- 02-90 As discussed in the Master Response regarding the Reduced Density Alternative, CEQA does not require that every permutation be evaluated in the DEIR. Furthermore, the DEIR did not identify any significant and unavoidable impacts that would result specifically as the result of the location of the mountain maintenance facility. The mountain maintenance facility would not be located in an area visible from Squaw Valley Road, a scenic roadway, the meadow, or other particularly sensitive areas. Further, the scale of the building would not intrude into views from neighboring areas and trails. As shown in Figure B.18 of the VSVSP, the building is expected to be located at the eastern edge of the parcel, in proximity to other buildings. The floor area ratio would be only 0.10, so the building would have a relatively small footprint, and most of the parcel would remain unchanged. The building height would not exceed 35 feet. For these reasons, relocation of the mountain maintenance facility was not considered in the development of alternatives. Also, see the Master Response regarding the mountain maintenance facility for a discussion of land use conversion impacts associated with this facility.
- 02-91 As discussed in response to comment O9-298, the DEIR describes alternatives that address retention of the historic buildings within the plan area.

- 02-92 The comment summarizes and places in a table prior comments that address reducing the density of the project. See responses to comments 02-82 through 02-91, which address each of the features and issues described in the table included in this comment.
- 02-93 See the Master Response regarding the cumulative analysis.
- 02-94 The DEIR does address the effects of climate change on water supply, flooding, wildfire, and avalanche (see Impact 16-3) and the combined effects of noise and other disturbances as they relate to land use compatibility (see Impact 4-3). See the Master Response regarding the cumulative analysis for a discussion of combining the individual impacts of the project in the cumulative impact discussion.
- 02-95 The comment states that a revised DEIR should be prepared for public circulation. However, for the reasons discussed under responses to comments 02-1 through 02-94, the analysis is adequate and no changes to the DEIR are necessary that require recirculation. See also the Master Response regarding recirculation.