05

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July 17th, 2015

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

Dear Ms. Krach,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Squaw Valley Specific Plan. Mountain Area Preservation (MAP) would like to submit the following comments for the public record regarding the adequacy of the Squaw Valley Specific Plan DEIR. MAP is an environmental advocacy non-profit organization established in 1987, based in Truckee. Our mission is *to preserve the Truckee region's community character and natural environment for present and future generations.*

MAP was founded twenty-eight years ago to be a local voice for the protection of our unique environment here in the Truckee region. We have advocated since our inception for the protection of open space and sound land use planning/policy. The current Squaw Valley Specific Plan is a programmatic EIR, which gives the community and environment no assurances as to what exactly will be developed, when it will occur and the associated impacts the project will bring to the region and environment. We feel the scale of the proposal will have lasting impacts on Squaw Valley's existing community character, the valley's precious natural resources, regional roadways and severe cumulative impacts to the Truckee and North Lake Tahoe communities. The DEIR has identified numerous significant and unavoidable impacts, which will warrant additional analysis, adequate mitigation measures and/or potential project reductions in order to comply with CEQA and the Placer County General Plan. 05-1

The EIR is the heart of CEQA. It is an environmental alarm bell, to alert the public and responsible stakeholders and officials to environmental changes before they have reached ecological points of no return. The EIR is intended to demonstrate apprehensive citizenry that the agency has in fact analyzed and considered all of the ecological implications of its actions. MAP has reviewed the Squaw Valley Specific Plan and

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pertinent sections of the DEIR. We have found the following sections to have inadequate or missing analysis; Workforce Housing, Transportation and Circulation, Hydrology and Water Quality, Greenhouse Gases and Project Alternatives. Please accept our following comments in regard to the adequacy of the DEIR. 05-1 cont.

Population, Employment and Housing: The Specific Plan and DEIR does not adequately mitigate impacts associated with employee/workforce housing.

- **The Squaw Valley Specific Plan fails to sufficiently propose adequate development of workforce housing for the proposed development project.** The DEIR states 574 new employees will be created annually with the anticipated development proposal, the project will be removing 99 existing units and the county requires at a minimum 50% of FTE to be housed on site (DEIR pg. 5-12). The East Parcel development will only house 300 employees, which does not meet the requirement for the Placer County General Plan with the demolition of the current employee housing, this is a significant impact. Deferring mitigation to a later date to identify off-site housing locations or paying an in-lieu fee to Placer County is not acceptable. The project applicant should go above Placer County's requirement and provide enough housing for all 574 employees created through the projected development project. Creating housing for 100% of the employee base will help to mitigate traffic and greenhouse gas emission impacts for the region, and create the needed employee infrastructure a year-round resort should be required to implement. 05-2

- **Mitigation Measure 5-3 will not lessen the employee/workforce impact to less than significant.** The Squaw Valley Specific Plan East Parcel dwelling will only accommodate less than 30% of new employees; Placer County requires a minimum of 50% FTE to be housed on the project site. The proposed VSVSP Employee/Workforce Housing Plan will likely push the employee housing burden onto adjacent communities such as Truckee and North Lake Tahoe, which currently have a very limited stock of affordable or market rate rentals available for the local workforce. Not only is there virtually zero affordable housing units in the North Lake Tahoe region, affordable housing developments such as Henness Flats, Frishman Hollow and Domus have long waiting lists. The surrounding Truckee and North Lake Tahoe community is dealing with a workforce-housing crisis. Placing the impact on 05-3

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the surrounding region or through the payment of in-lieu fees to Placer County will not adequately lessen the impact; it will only further exacerbate the issue outside of Squaw Valley. The project applicant should plan to house all 574 new employees within the proposed project site, and create additional housing strategies to fully mitigate the impact of the proposed project. 05-3 cont.

- **The creation of VSVSP Employee/Workforce Housing Plan at a later date is unacceptable (DEIR pg. 5-13).** A housing plan should be a created concurrently with the project submittal and the Specific Plan, in order fully understand proposed housing solutions, while concurrently being analyzed under CEQA. Additionally the use of in-lieu fees ultimately lacks transparency as to where Placer County plans to utilize the funds. Housing strategies need to be in place in order to minimize the impacts of the proposed Specific Plan, especially if fees are to be collected for future employee housing development. 05-4

- **The DEIR fails to analyze the cumulative impact of placing workforce housing off-site to the Town of Truckee or the North Lake Tahoe region.** The DEIR contains zero analysis of the associated impacts of building off-site employee housing for the proposed development. The DEIR needs to be revised to include potential off-site housing locations and analyze the associated impacts to the environment with potential locations. 05-5

Transportation & Circulation: The Squaw Valley Specific Plan DEIR identifies numerous significant and unavoidable impacts in regard to the projects anticipated traffic and circulation impacts.

- **Circulation and Parking Policies for proposed project allow for an unacceptable Level of Service, LOS F.** The Squaw Valley Specific Plan Circulation and Parking Goal, CP-1 (SP, pg 5-2) differs from DEIR verbiage, pledging a LOS F as acceptable for the project area (DEIR pg. 9-33). DEIR states, "improvements, necessary to achieve the adopted LOS would create capacity that was un-needed during the majority of the year," (DEIR pg. 9-33). While Placer County allows a LOS F for resort areas with seasonal atypical traffic conditions, the project will create 25 years of phased construction, creating grid lock in the valley and surrounding roadways. A LOS F will create hazardous road conditions for a project area where there is only one road segment into the valley and a full-time housing population. Allowing LOS F is unacceptable, considering the 05-6

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impact to the surrounding areas of Truckee and Tahoe City with this policy allowance. The DEIR needs to be re-circulated and identify mitigation measures to address the level of service. Placer County cannot allow un-safe road conditions for the regional community and environment. 05-6 cont.

- **Adverse impacts to Caltrans intersections, creating cumulative impacts to Truckee and Tahoe City.** The DEIR concludes that the proposed project will result in unacceptable roadway operations and impacts to Caltrans Highways, (Impact 9-5, DEIR page. 9-63). The following segments of the highway will have a significant impact between Deerfield Drive and West River Street and State Route 28 east of State Route 89 in Tahoe City. The DEIR includes Mitigation Measure 9-5: Improve operations on select segments of SR 89 and SR 28, proposing a 4-lane widening project, yet the project plans do not currently include this mitigation as a part of the planning documents or fee programs. The DEIR claims this is an unavoidable and significant impact. The project applicant and Placer County need to revise and re-circulate the DEIR to include a feasible mitigation measure to address this impact. Claiming the impact is unavoidable is not acceptable for the surrounding communities and roadway safety. 05-7

- **Construction impacts would be significant and the DEIR is missing analysis.** The DEIR states "the Specific Plan will be developed over an estimated 25-year build out period, with construction proposed to begin as early as spring of 2016. Construction activities are anticipated to require up to an estimated total of 136 construction workers during the most intense time of year for construction," (DEIR pg. 9-66). While Mitigation Measure 9-8 concludes the Construction Traffic Management Plan (CTMP) will reduce the impacts to less than significant the DEIR fails to analyze additional impacts with 136 construction worker vehicle trips. The DEIR claims it would be "speculative to conduct any type of quantitative analysis," to address additional construction impacts. The DEIR needs to be revised to include this analysis in order to fully understand all potential project related impacts associated with construction. 05-8

- **DEIR fails to analyze project impacts to Interstate-80.** Exhibit 9-10 of the DEIR examines project only trips, yet fails to analyze impacts to Interstate-80. Other regional development projects analyze impacts to I-80, as the interstate is primarily used for project related transit (i.e. construction materials and 05-9

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employees). The Squaw Valley Specific Plan has determined development will occur for 25 years, the project will likely create adverse traffic impacts to I-80, the DEIR needs to be revised and re-circulated to include analysis of I-80 impacts and proposed mitigtaion. 05-9 cont.

Hydrology & Water Quality: The Squaw Valley Specific Plan DEIR includes extensive analysis and references to the Water Supply Assessment (WSA), which underestimates impacts to the local watershed.

- **The DEIR overestimates the annual precipitation on the surrounding mountains, which could create incorrect analysis in the watershed modeling.** The DEIR states "the average total annual precipitation on the valley floor is 47 inches, while the average for surrounding mountains is 263 inches,"(expressed as snow water equivalent, inches of both water and rain, including snow melt), Exhibit 13-4, DEIR pg. 13-7, also shown in WSA in Table 3-1. Climate Data. The DEIR refers to 263 inches per year which is a figure taken from the WSA. This is a very high amount of precipitation for the area, as well as using a 1:10 ratio that is not applicable to the Sierra Nevada region. The analysis should have looked at the actual SNOTEL numbers, which estimates the average inches of precipitation with a bulk catch sensor that will gauge both rain and snow. The annual average precipitation for Squaw was shown to be 80.6 inches per year from 1993-2011. With the analysis and models using an annual precipitation of 263 inches per year (DEIR pg. 13-7) the impacts of the proposed project have been greatly diminished by not using the factual amount of precipitation for the valley. This in turn creates room for error in the hydrologic models and does not adequately analyze the impacts associated with the proposed development to the local watershed. By not using the correct amount of precipitation, the recharge estimate for the project is also flawed. The DEIR needs to be revised and re-circulated to include the correct analysis for the watershed recharge and associated impacts with the proposed development. 05-10

- **DEIR fails to look at aquifer drawdown with expected demand for the proposed project.** In order to understand the aquifer demand for the proposed project the DEIR should include analysis of the aquifer drawdown, by looking at the proposed land uses and ground water saturation at during different time frames of the year. The DEIR includes exhibits 05-11

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illustrating the Groundwater Elevation in Existing Wells: 1992-2011 (Exhibit 13-8) and the Percent of Saturation in Existing Wells: 1992-2011 (Exhibit 13-9), yet there is no drawdown map. The DEIR should be revised and re-circulated to include drawdown analysis. This is imperative considering the SVPSD is looking to create a redundant water source utilizing the Martis Valley aquifer, which will adversely create impacts in Martis Valley to only further development in Squaw Valley. 05-11 cont.

- **DEIR fails to analyze impacts to the Truckee River Watershed.** The DEIR recognizes the restoration efforts to restore Squaw Creek as a part of the proposed Specific Plan, yet fails to analyze associated impacts the development may have on the Truckee River watershed. The DEIR should analyze potential impacts to the Truckee River, considering Squaw Creek is a tributary to the watershed. 05-12

Greenhouse Gases & Climate Change: The Squaw Valley Specific Plan as proposed will yield greenhouse gas emissions that exceed the operational standards of 1,100 metric tons of CO2 per year. The DEIR states operational emissions at full build out will yield 45,403 metric tons of CO2 per year, which clearly exceeds the current threshold, yet the DEIR analysis justifies it will be less than significant with the PCAPCD threshold for 2020. Utilizing assumptions on future project GHG emissions with standards in the unforeseen future is appalling analysis for a project of this scale. Placer County has yet to adopt a Climate Action Plan (CAP). Future development in the county, including Squaw Valley should adopt a standard, create local initiatives and craft emission reduction benchmarks in order to make sizable land use decisions. Deferring analysis to 2020 or beyond when new state regulations are applied is inadequate; a CAP should be created in conjunction with the project application. 05-13

- **Mitigation Measure 16-2: Implement ongoing operational greenhouse gas review and reduction program, defers project mitigation to 2020.** This is inadequate mitigation, the DEIR needs to provide additional mitigation to address climate impacts with the proposed Specific Plan. 05-14

- **The DEIR fails to identify project alternatives to reduce the GHG emissions that are forecasted for operational emissions.** Current GHG emissions for operations from 2010-2013 generated a maximum of 13,765 metric tons of CO2 (DEIR pg. 16-3). While Squaw has taken some steps to reduce their emissions, the DEIR should identify initiatives for GHG 05-15

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reduction within the development plans. We cannot continue ignoring the changing climate of the Truckee-Tahoe region and neither should future development proposals in the area. 05-15 cont.

Project Alternatives: The DEIR analyzed six project alternatives for the Squaw Valley Specific Plan, finding the environmentally superior alternative to be the **Reduced Density Alternative 17.3.4**, which would reduce all Specific Plan project components by 50%. (i.e. units, rooms, retail/restaurant square footage and full time employees) (DEIR pg. 17-24). By reducing the development potential by half many of the environmental impacts MAP has commented on will be minimized to a less than significant finding for CEQA. The DEIR references important environmental benefits with the Reduced Density Alternative such as buildings height reductions, a smaller Mountain Adventure Camp utilizing less water and a diminished construction timeline from 25 years to 15 years. The alternative would also require a master plan process, which would help to avoid piecemeal planning, while creating a unified plan and assurances for the surrounding community. The DEIR states the alternative would not meet all project goals (DEIR pg. 17-25), yet under CEQA fiscal analysis is not analyzed. Placer County and the project applicant should conduct an economic analysis for the Reduced Density Alternative in order to determine if the project alternative would be financially feasible. Considering the proposed Specific Plan and the numerous unavoidable impacts associated with the plan, we urge the applicant and county to seriously consider this alternative. 05-16

Placer County General Plan Policy 1.G.1

The Placer County General Plan Policy 1.G.1 states it will *support the expansion of existing winter ski and snow play areas where circulation and transportation system capacity can accommodate such expansions or new uses and* ***where environmental impacts can be adequately mitigated***. The DEIR has referenced ample significant and unavoidable impacts related to the proposed Squaw Valley Specific Plan. In order to stay consistent with county policy it is imperative that future development in Squaw Valley be tailored to fit the valley and its environmental constraints. The impacts outlined in the DEIR to traffic, public safety, water quality, scenic resources and our changing climate are too grave to be ignored for capital gain. We feel the SVGPLUO vision to "ensure that Squaw Valley is developed into a top quality, year-round, destination resort," "without adversely impacting the unique aesthetic and environmental assets of Squaw Valley, "(Placer County 1983:4) can still be met by reducing the scale of the proposed 05-17

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project. Squaw Valley Real Estate, LLC is capable of redeveloping the resort in a sensitive manner in order to protect the local environment and quality of life in the valley.

On behalf of the Board and Staff of Mountain Area Preservation we are truly appreciative for the opportunity to review and comment on the proposed Squaw Valley Specific Plan and DEIR. We recognize Squaw Valley Real Estate, LLC has project objectives and fiscal goals tied to the Specific Plan, but environmental protection of the valley and the surrounding communities needs to be at the heart of any future development proposal. MAP believes there can be a balance of development and environmental stewardship, by utilizing smart growth principles, working with the community and protecting our scenic vistas and natural resources for present and future generations. We are committed to ensuring the Truckee-Tahoe region remains beautiful, by preserving the community character of our unique mountain towns and protecting our vibrant natural resources. We are happy to follow up on our comments and concerns with the project applicant and Placer County if needed. O5-17 cont.

Please contact our office at 530-582-6751 or by email Alexis@mapf.org if you have questions or need clarification on our comments. Thank you again for taking our comments and review into consideration for the Squaw Valley Specific Plan and DEIR.

Sincerely,

Alexis Ollar, MS & GISP
MAP Executive Director

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Mountain Area Preservation
Alexis Ollar, MS/GISP
July 17, 2015

O5-1 Comments related to the Mountain Area Preservation's history and concerns related to EIR adequacy are noted. See responses to the detailed comments below.

O5-2 The comment correctly states that the project would not meet employee housing requirements set by the County's General Plan (see Impact 5-3: Displace substantial numbers of housing or people). As summarized on page 5-12 of the DEIR:

> The project is expected to generate an additional 574 new FTE employees annually. To be consistent with *Placer County General Plan* policies, the project would be required to provide housing for 287 employees (one half of the FTE total). In addition, the project includes removal of existing structures in the main Village area (Courtside and Hostel) that currently provide employee housing for up to 99 staff. With the removal of these existing employee housing facilities, the project would need to provide housing for 386 employees (287 new employees plus 99 replacement housing facilities) to meet the Placer County policy. Under the current illustrative plan, employee housing units (in different bedroom and dormitory configurations) would be constructed on the East Parcel to house a maximum of 300 employees. This would be sufficient to replace the housing for 99 employees removed by the project, but would be less than the required number of beds to meet *Placer County General Plan* policies for new employee housing. Therefore, this impact would be **potentially significant**.

Mitigation proposed to reduce this impact is consistent with Policy C-2 in the County's General Plan that requires employee housing or support for employee housing to be provided in one of the following ways: construction of on-site employee housing; construction of off-site employee housing; dedication of land for needed units; and/or payment of an in-lieu fee such that the project provides housing for 50 percent of FTE employees.

Under the proposed project, development would occur over a period of approximately 25 years. The employee housing would be built at a rate that would accommodate employee generation. The VSVSP Employee Workforce Housing Plan required by Mitigation Measure 5-3 would be submitted with recordation of the first Small Lot Tentative Map or approval of a building permit for any new-employee generating project that does not require a Small Lot Final Map and must be updated concurrent with review and implementation of each project or project phase that generates new FTE employees. It is important to note that issues directly associated with provision of employee housing, including the volume of employee housing to be provided by a project, is a socio-economic and local policy issue and is not considered to be of environmental significance, except as it relates to compliance with a county policy adopted for the purposes of avoiding or reducing an environmental impact, pursuant to CEQA requirements. Because this mitigation measure is consistent with Placer County General Plan Policy C-2, it is not considered to be deferred mitigation as it meets the requirements set therein and the options for a final outcome are defined in the Policy. The potential environmental issues associated with induced population (i.e., indirect effects of employee housing demand) are discussed in Chapter 5, "Population, Employment, and Housing" and Section 18.4, "Growth-Inducing Impacts of the Proposed Project."

Regarding the comment that the project should provide for 100 percent of employee housing, in part to reduce impacts associated with traffic and GHGs, this would require the project to provide double the amount of employee housing mandated by General Plan policy.

This request will be reviewed by the County Planning Commission and Board of Supervisors in their deliberations over the project. Regarding the comment that provision of this housing would reduce traffic and GHG impacts, if additional housing was constructed in proximity to the project, it would likely reduce traffic and GHG emissions in the long term (although construction of this additional housing could generate additional construction traffic and GHG emissions), but only that portion associated with employees who would otherwise commute from outside of Olympic Valley. It is not known if an additional housing site is available proximate to the project site; given the difficulty in locating enough property near the site to construct the proposed employee housing, it is unlikely that additional parcels would be available in proximity to the site that could accommodate this housing unless it was provided within the Main Village in place of other project facilities.

O5-3 As described in response to comment O5-2, the project, including employee housing, would be built over a period of approximately 25 years and employee housing obligations would be required to be met concurrent with each phase of project development. Because the proposed mitigation would be consistent with established County policy, it is anticipated to adequately mitigate potential impacts.

O5-4 See responses to comment O5-2 for discussions related to employee housing associated with the project.

O5-5 Cumulative impacts associated with displacement of housing or people are discussed under Impact 18-5 (Cumulative displacement of a substantial number of housing or people). Impacts related to off-site employee housing are discussed in Section 18.4, "Growth-Inducing Impacts of the Project." As stated therein:

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

Thus, these issues have been addressed and the DEIR does not need to be revised. See, also, responses to comment letter L6 from the Town of Truckee, which discusses the effects off-site employee housing, including the distribution of employee-generated vehicle trips throughout the study area.

O5-6 See the portion of the traffic Master Response that addresses LOS standards. It is noted that the comment raises objections to traffic conditions described in the DEIR, but the comment does not disagree with the analysis of the DEIR.

O5-7 The comment suggests that Mitigation Measure 9-5 recommends widening portions of SR 89 and SR 28 to a four-lane highway. This is not correct. Mitigation Measure 9-5 describes how the "concept facility" for SR 89 between Deerfield Drive and West River Street is a four-lane conventional highway and that such a widening is not currently included in any adopted planning documents or fee programs. The comment also suggests that it is not "acceptable to claim an impact is significant and unavoidable." CEQA requires the identification of feasible mitigation measures for significant project impacts. If no feasible mitigation is available, then the impact is considered "significant and unavoidable." In this instance, while Caltrans has conducted a study regarding widening SR 89 and SR 28, these are regional roadways and are predominantly affected by other traffic, with the project exacerbating

conditions. A fair share contribution of the project to financing improvements to these roadways, if such improvements are feasible (i.e., sufficient right of way available without adversely affecting sensitive resources), would not be sufficient to effectuate the improvements. See the Master Response regarding significant and unavoidable impacts.

O5-8 See the portion of the traffic Master Response that addresses the construction impact analysis.

O5-9 See the portion of the traffic Master Response that addresses I-80.

O5-10 The comment states that the DEIR overestimates the annual precipitation on the surrounding mountains, which could create incorrect analysis in the watershed modeling. See the Master Response regarding water supply.

O5-11 The comment requests maps of drawdown in the aquifer as a result of future increases in groundwater production. The groundwater model used in the DEIR covers a time period of 19 years with monthly time steps. This means that the model simulates 228 unique groundwater elevation conditions throughout the aquifer. Drawdown is a term relating to the change induced in groundwater as the result of pumping. Because pumping occurs throughout the model at varying volumes, no single time period represents the most severe drawdown condition for all areas of the model. As a result, maximum drawdowns in specific areas occur at different times, thereby necessitating preparation of such a number of maps as to render them unusable. Accordingly, the DEIR identified the areas and environmental resources likely to be affected by decreased groundwater elevations and assessed the provided groundwater elevation hydrographs at specific locations including refugia pools and selected sites along the creek, areas with riparian vegetation, and existing production wells. These hydrographs show the effects of drawdown for the entire model time period in the identified sensitive locations.

Regarding the potential for the SVPSD to develop a supplemental water supply source from Martis Valley, see the Master Response regarding water supply.

O5-12 The comment states that the DEIR fails to analyze impacts to the Truckee River watershed. See the Master Response regarding water supply.

O5-13 The comment states that the 45,403 metric tons of carbon dioxide-equivalent per year (MT CO_2e/year) estimated for the proposed project under full buildout clearly exceeds the threshold of 1,100 MT CO_2e/year. Indeed, as stated on page 16-16 of the DEIR, the project's operational greenhouse gas (GHG) emissions would exceed the Tier I mass emission threshold of 1,100 MT CO_2e/year recommended by Placer County Air Pollution Control District (PCAPCD), as well as other air districts in the region. This is a significant effect. While the DEIR concluded that the relative efficiency of the project appeared to be consistent with state goals expressed in AB 32, the discussion of this issue has been revised, in the Master Response regarding GHG emissions, to reflect a recent California Supreme Court case on this issue. The same Master Response also provides updated GHG emissions projections, as well as quantification of mitigation.

The comment also states that "utilizing assumptions on future project GHG emissions with standards in the unforeseen future is appalling analysis for a project of this scale." However, the commenter does not provide reasoning or evidence to support this claim. As explained under Impact 16-2 starting on page 16-4, the state, including CARB, has not identified reduction targets beyond the target of reducing statewide GHG levels to 1990 levels by 2020. (See Health & Safety Code Section 38551.) On pages 16-5 and 16-17, the DEIR explains the likelihood that the state will develop a post-2020 reduction target. (As described in the aforementioned Master Response, an update to ARB's Scoping Plan is expected to

address this, and new regulations would also be expected.) The ability of this project—and all land use development—to achieve any goals beyond 2020 is partially out of the control of the project and its developer because, as has been the course of action in the past, the ability to attain goals will, in part, rely on regulations. For instance, new State legislation passed and signed by the Governor in October 2015, following circulation of the DEIR. SB 350 (De Leon), mandates that 50 percent of electricity in California be provided by renewable resources by the year 2030, an increase from the 33 percent renewable energy standard required by 2020. This change, signed into law, will further reduce GHG emissions from the project that are attributable to electricity consumption and will support further electrification of the transportation sector. (See SB 350, amendments to Pub. Utilities Code, Section 740.12.). As shown in Table 16-2 and 16-3 of the DEIR, electricity consumption is responsible for nearly one quarter of the GHG emissions associated with the project.

Other legislation was proposed in the 2015 State legislative session that would also reduce GHG emissions and establish new GHG targets upon which new regulations would be based. The relevant bill, SB 32, did not pass, but is likely to be re-proposed in the 2016 session (Capital Public Radio 2015). These pieces of legislation were mentioned by inference in the DEIR, page 16-17: "New legislation is proposed to establish post-2020 goals, but no action on the legislation has been taken, as of this writing (May 2015)."

This information is not provided as a means to suggest any certainty with respect to regulations; rather, it is provided as further evidence that the ability to predict future emissions *is* speculative because the regulatory environment, which has the potential to dramatically alter GHG emissions, is in a state of flux. Additionally, new regulations are a virtual certainty. The California Air Resources Board (ARB) published the *First Update to the Climate Change Scoping Plan* in May 2014 and has indicated it will update this plan to reflect 2030 GHG goals established in Executive Order B-30-15, which sets a target to reduce GHG emissions to 40 percent below 1990 levels by 2030 (ARB 2014). With this information as a backdrop, it can be seen that the accuracy to which emissions in years beyond 2020 can be estimated is limited. Nonetheless, because the project would generate substantial GHG emissions, and because it is not known if the project would be consistent with future GHG reduction targets, the impact would be potentially significant. Thus, the DEIR includes Mitigation Measure 16-2 (modified in the Master Response), which requires VSVSP projects processed by the County after 2020 to reduce GHG emissions, to the extent needed and feasible, such that the projects would operate in a GHG-efficient manner that is consistent with the applicable post-2020 reduction target established by the state or Placer County. Mitigation Measure 16-2 lists a variety of ways GHG reductions can be achieved but also acknowledges that other reduction measures may become feasible as future technologies are developed. However, because it is too speculative to know whether the project could operate in a GHG-efficient manner that is consistent with state-established GHG targets beyond 2020, the residual impact was determined to be potentially significant and unavoidable.

The comment also lists some of the benefits of the County developing a Climate Action Plan (CAP). An overall County CAP is beyond the scope of the project. This is a comment on County processes and regulations, but does not address the content of the DEIR.

O5-14 The comment states that Mitigation Measure 16-2 is inadequate. However, the comment provides no reasoning or evidence to support this statement or suggestions about what level of mitigation would be both feasible and adequate. See response to comment O5-13.

O5-15 The comment states that the DEIR fails to identify project alternatives that would have lower operational GHG emissions. The Reduced Density Alternative (page 17-31 in Section 17.3.4 of the DEIR) and the Preservation of Historical and Wetlands Resources Alternative (page 17-

41 in Section 17.3.6 of the DEIR) both would result in less GHG emissions than the project because they propose smaller versions of the specific plan.

The comment also states that the DEIR should identify initiatives for GHG reduction within the development plans. Mitigation Measure 16-2 requires individual projects developed under the VSVSP to implement any and all GHG reduction measures and GHG efficiency measures to align GHG reduction targets that would be consistent with State goals. References to specific measures in the VSVSP are addressed in this measure, such as mandating certain GHG reduction measures instead of these measures being discretionary (changing "should" to "shall" in the VSVSP). The Master Response regarding GHG emissions provides more detailed information.

The comment also implies that the County is ignoring the changing climate of the Truckee-Tahoe region. Project-generated GHG emissions are addressed in Impacts 16-1 and 16-2 of the DEIR. Impacts of climate change on the proposed project are also addressed under Impact 16-3, beginning on page 16-19 of the DEIR.

O5-16 See the Master Response regarding the Reduced Density Alternative.

O5-17 See the Master Response regarding significant and unavoidable impacts, including a discussion of Placer County General Plan Policy 1.G.1.

06

North Tahoe Preservation Alliance
P.O. Box 5
Crystal Bay, Nv. 89402
Preserve@NTPAC.com 775-831-0625
www.ntpac.com
"Helping preserve the natural beauty and rural character of North Lake Tahoe"

Via email Maywan Krach, Placer County Planning
July 15, 2015

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

Dear Ms. Krach:

This letter provides comments on the above mentioned EIR. The North Tahoe Preservation Alliance (NTPA) is a Nevada Nonprofit corporation formed to ensure that North Lake Tahoe retains its natural beauty and easygoing, rustic lifestyle. This letter provides comments on the Environmental Impact Report that are in addition to and do not replace or otherwise supersede comments that were previously submitted. We also incorporate comments from the following organizations and individuals: 06-1

Tahoe Area Sierra Club Friends of the West Shore

The EIR failed to adequately analyze the environmental impacts associated with the proposed Squaw Valley project on the entire Lake Tahoe basin specifically;

1. Significant and Unavoidable Impacts to SR 28 east of SR 89. The FEIR fails to examine additional and meaningful options to reduce the proposed projects traffic impact to the Tahoe Basin. 06-2
2. The FEIR failed to analyze and disclose all impacts to TRPA threshold standards, including but not limited to LOS and VMT increase in in Basin highways and arterial roadways, air quality, recreation and project related cumulative impacts of additional projects in or near the Lake Tahoe Basin. 06-3

For each of these reasons, the NTPA, respectfully request that Placer County as the lead agency distribute a technically and legally adequate EIS/EIR and for Public review and comment that fully complies with the law and is supported by substantial evidence in light of the whole record. 06-4

Sincerely,
Ann Nichols

1

06

North Tahoe Preservation Alliance
Ann Nichols
July 15, 2015

O6-1 The comment is an introductory statement and does not address the content, analysis, or conclusions in the DEIR. Therefore, a response is not provided here.

The comment also states that comments from the following organizations are incorporated: Tahoe Area Sierra Club and Friends of the West Shore. See responses to comment letters O7 and O3, respectively.

O6-2 The comment states that the DEIR fails to examine additional and meaningful options to reduce the project's traffic impacts to the Tahoe Basin (SR 28 east of SR 89). See response to comment letter O3 regarding impacts to SR 28 east of SR 89. Also see the Master Response regarding traffic.

O6-3 See the Master Response regarding TRPA thresholds.

O6-4 The comment states that for the reasons above, the County should submit a technically and legally adequate EIS/EIR for public review and comment that fully complies with the law and is supported by substantial evidence in light of the whole record. However, for the reasons discussed under responses to comments O6-1 through O6-3 and in other responses to comments provided in this FEIR, the analysis is adequate and no changes to the DEIR are necessary. The proposed Specific Plan does not require approval of a federal agency, so an EIS (environmental impact study under the National Environmental Policy Act or NEPA) is not required.

07

SIERRA CLUB
FOUNDED 1892

Mother Lode Chapter
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Tel. (916) 557-1100 ext. 119
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July 14, 2015

Placer County Community Development Resources Agency
Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95603

Attn: Maywan Krach

Re: Village at Squaw Valley Specific Plan DEIR

The Mother Lode Chapter of the Sierra Club appreciates the opportunity to comment on the above referenced Draft Environmental Impact Report. While the acres covered by the Village at Squaw Valley development are not substantial, many of the impacts are. The DEIR considers Cultural resources, Scenic and Visual Resources, Transportation and Circulation and Noise impacts to be ***significant and unavoidable***. Further, Greenhouse Gas impacts are potentially ***significant and unavoidable*** beyond 2020. Many other impacts studied are deemed to avoid ***significance*** only by considerable numbers of mitigation measures.

Placer County's 1983 Squaw Valley Land Use Ordinance and more recently adopted as a Community Plan states in Policy 1.G.1. "The county will support the expansion of existing winter ski and snow play areas and development of new areas where circulation and transportation system capacity can accommodate such expansions or new uses and where environmental impacts can be adequately mitigated." The project, as currently proposed, contradicts both the letter and spirit of the Ordinance. It creates too many unavoidable impacts that cannot be mitigated sufficiently for the County to consider a finding of overriding consideration. 07-1

Squaw Valley has a storied and historic Olympic past - a grand vista with soaring mountain walls and peaks surrounding the meadow and creek environment. It remains a visual delight, even with the somewhat haphazard buildings styles and shapes of today. The County should be careful to protect the scenic vistas from large scale development. Doubling the numbers of potential beds and raising building height limits in the Valley will not lead to protection of the resource. 07-2

Of particular interest are the DEIR's water supply figures given current drought predictions and climate change . Most of the technical data is taken from before 2012 and new ownership. We would suggest that the County request more current figures on which to base its decisions and in light of reported increased snow-making in the last several years. 07-3

Delta Sierra Group
Maidu Group
Placer Group
Sacramento Group
Shasta Group
Sierra Nevada Group
Tahoe Group
Tuolumne Group
Yahi Group
Yokuts Group
Yolano Group

Representing 17,000 members in 24 counties in Northern and Central California
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Sacramento - San Joaquin - Shasta - Sierra - Siskiyou - Solano - Stanislaus - Sutter - Tehama - Tuolumne - Yolo - Yuba

The DEIR spent many pages describing the process of Climate Change and discussions of California state policies pertaining to Greenhouse Gas emissions both in the current and future period. It states that post 2020: "Because the project would generate substantial GHG emissions; and because it is not known if the project would be consistent with future GHG targets, the impact would be ***potentially significant***" (pages16-18). One could conclude that the project as proposed is too large at build-out and creates too many visitors and vehicle miles traveled. 07-4

The proposed Village at Squaw Valley Specific Plan, as analyzed in the DEIR, results in **too many significant and unavoidable impacts** which outweigh the benefits that such a project would provide. Clearly the County must deny the project as proposed and reject any claim of overriding considerations. 07-5

Thank you for consideration of our comments.

Sincerely,

Barbara L. Rivenes

Barbara Rivenes
Chapter Conservation Committee

Representing 17,000 members in 24 counties in Northern and Central California
Alpine - Amador - Butte - Calaveras - Colusa - El Dorado - Glenn - Lassen - Modoc - Nevada - Placer - Plumas
Sacramento - San Joaquin - Shasta - Sierra - Siskiyou - Solano - Stanislaus - Sutter - Tehama - Tuolumne - Yolo - Yuba

07

Sierra Club, Mother Lode Chapter
Barbara Rivenes, Chapter Conservation Committee
July 14, 2015

07-1 See the Master Response regarding significant and unavoidable impacts, which includes a discussion of Placer County General Plan Policy 1.G.1.

07-2 The project's potential to adversely affect a scenic vista is addressed in Impact 8-1 in the DEIR (see pages 8-47 through 8-50). No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is provided here.

07-3 See the Master Response regarding water supply.

07-4 The comment references the conclusion of DEIR Impact 16-1, which describes the project's operational GHG emissions and concludes that the impact would be potentially significant without mitigation (see pages 16-15 through 16-19). The DEIR provides mitigation, but nonetheless concludes that even with mitigation the project's contribution to GHG emissions would be significant and unavoidable. No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is provided here.

07-5 See the Master Response regarding significant and unavoidable impacts. The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the DEIR. Therefore, no further response is provided here. All comment letters submitted during the DEIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

08

SIERRA WATCH
Sierra Watch
408 Broad Street #12
Nevada City, CA 95959

July 17, 2015

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

Dear Ms. Krach:

Thank you for the opportunity to comment on the *Village at Squaw Valley Specific Plan Draft Environmental Impact Report* (DEIR).

As is made clear in the attached letter, the DEIR fails to satisfy the basic requirements of state planning and environmental laws, and the proposed development is starkly inconsistent with both the spirit and letter of existing Placer County policy.

The inadequacies of the DEIR are rooted in the scale of the development proposal. The proposed *Squaw Valley Village Specific Plan* (the Project) would remake the region with a series of highrise condominium projects and an indoor amusement park. All told, new approvals would entitle 25 years worth of development. It may be impossible to truly assess the full range of impacts that development of its size and scope would have in the context of such a treasured place as Squaw Valley and the Tahoe Sierra. CEQA, however, demands nothing less. 08-1

In order to ensure that planning in Squaw Valley does provide a responsible vision for the region *and* satisfies the requirements of state law, Sierra Watch urges Placer County to deny the Project outright and ask proponents to submit an entirely new application for entitlements.

We are confident that, working together, local residents, Tahoe lovers, Placer County, and the landowner could come up with a better blueprint for reasonable development that would prove worthy of Squaw Valley – one of the great, iconic places of our shared Sierra.

Our comment letter was prepared by the law firm of Shute, Mihaly & Weinberger. Their conclusions are the result of detailed research by a team of experts in law, planning, hydrology, wildlife biology, transportation, and related fields.

The team carefully reviewed the proposed plan, relevant biological data, hydrological models, recent transportation studies, the Water Supply Assessment for the Project, and related case law – as well as the DEIR itself. 08-1 cont.

Once again, their findings are clear: the DEIR fails in numerous respects to comply with fundamental requirements of the *California Environmental Quality Act* (CEQA).

Transportation is an especially important issue in the region; no one likes to spend their time in Tahoe stuck in traffic. The DEIR, however, fails to adequately assess the Project's impact on local and regional roadways.

- The DEIR fails to adequately analyze the Project's impact on summer traffic, containing no analysis of summer daily traffic – despite the DEIR's assertion that the Project is expected to generate three times more peak-day traffic in the summer (8,410 new daily trips) than in the winter (2,821 new daily trips). 08-2
- The DEIR also substantially underestimates the volume of winter peak-hour traffic, relying on faulty methodology to identify the amount of traffic the Project would be expected to generate. 08-3
- The DEIR's limited traffic analysis is further flawed because the document grossly underestimates the number of car trips the Project would generate. For example, even though the DEIR estimates that 1,200 guests would likely visit the proposed amusement park every day, the document asserts that this attraction would generate only 58 car trips per day. 08-4
- The DEIR underestimates the Project's traffic impacts because it dismisses impacts on Interstate 80 even though, if approved, the Project would routinely add more than 4,000 new daily car trips to I-80 and its ramps. 08-5
- The DEIR largely ignores the Project's effects on emergency access even though, if approved, the Project would choke numerous highways in the area with Level of Service 'F' – gridlock. 08-6

The DEIR fails to adequately assess the Project's impacts on some of the key values that make up the unique and treasured sense of place in Squaw and Tahoe.

- The DEIR fails to adequately analyze or mitigate the Project's effects on Squaw Valley's iconic scenery; its simulations downplay the severity and extent of the Project's ten-story tall highrises. 08-7
- The DEIR fails to meaningfully assess or mitigate the Project's noise impacts, even though peace and quiet are fundamental selling points for the Tahoe experience. 08-8
- The DEIR's analysis of light and glare is legally deficient. The ability to enjoy the starry sky of the Sierra Nevada is an important and measurable value. Light pollution from Squaw already impacts the Tahoe Basin, but the DEIR fails to mitigate for increased glare. 08-9
- The DEIR fails to adequately analyze the Project's air quality impacts, notably from dust and particulate matter during the 25 years of demolition and construction. 08-10
- The DEIR does not adequately analyze impacts to cultural and historic resources, failing to identify, for example, that the Project site includes California Historical Landmark No. 724 (Pioneer Ski Area of America, Squaw Valley). 08-11

Squaw Valley is not an island, and the Project would have tremendous impacts throughout the Tahoe Sierra. But the DEIR also fails to assess its role in the region and relationship to other projects. 08-12

- The DEIR fails to adequately describe the regional setting and Squaw Valley's role in the broader Tahoe Sierra; it therefore downplays impacts on noise, traffic, and light pollution on the Tahoe Basin.
- The DEIR improperly segments linked projects. For example, it ignores the Project's potential relationship to the proponent's proposed Gondola connection to Alpine Meadows and the local water district's proposal to import water from Martis Valley (Project 60) and their associated impacts. 08-13

The current drought underscores the limits of Squaw Valley's watershed and existing concerns about water security. But the DEIR both overestimates existing supplies and underestimates likely demand.

- The DEIR's analysis of the Project's impacts on water supply resources is inadequate. Relying on a deeply flawed groundwater model, the DEIR grossly overestimates the amount of groundwater that is available to the Project. 08-14
  - The DEIR misleads the public with false annual precipitation data. The DEIR estimates average precipitation at 263 inches per year in snow-melt equivalent in Squaw Valley; the actual amount is only 80.6 inches per year – less than a third of what the DEIR claims. 08-15
  - The DEIR makes almost no mention of the current drought – or future droughts; instead it relies, incredibly, on precipitation data through only 2011. And it dismisses impacts of future drought by claiming, despite overwhelming contradictory scientific evidence, that drought events "are expected to be limited." 08-16
  - The DEIR fails to reveal the extent that the groundwater in the Basin is connected to Squaw Creek or that it flows in a subterranean stream. The use of surface waters and subterranean streams require water rights within the purview of the State Water Resources Control Board. Should the state assert their jurisdiction over the water in Squaw Valley, the applicant would need to "get in line" for a water rights permit; the project would not be guaranteed access to the water it would need. 08-17
- The DEIR's analysis of the Project's impacts on water supply resources is also inadequate because it applies artificially low occupancy rates to grossly underestimate the Project's demand on limited water supplies.
  - The DEIR employs an improper occupancy rate for its analysis. Proponents claim the development would create a year-round, world-class destination resort, but the DEIR assumes a low 55% occupancy rate. This rate is based on recent occupancy figures, a period marked by drought, poor snow conditions, and an historic economic recession. 08-18

Squaw Valley provides important habitat to a wide range of animal and plant species. But the DEIR fails to assess the Project's impact on biological resources.

- The DEIR fails to adequately analyze and mitigate the project's impact on riparian areas and in-stream water flows. For example, it fails to analyze the impacts on any sensitive habitat more than just 12 inches from Squaw Creek. And it ignores or downplays the fact that increased groundwater pumping would draw down water levels in Squaw Creek. 08-19

- The DEIR's flawed hydrological assessment minimizes the impacts to plants, fish, and wildlife that depend on a high water table to feed pools, meadows, and shallow root systems during the dry summer months. 08-20

- The DEIR's analysis of impacts on the endangered Sierra Nevada Yellow-legged Frog and its habitat is inadequate. The Project is within proposed critical habitat of the Sierra Nevada Yellow-legged Frog, which is listed as endangered under the federal Endangered Species Act. The DEIR recognizes this fact and discloses that the Project's construction may kill or injure individual frogs and result in the loss of its habitat. But its analysis is deficient because it fails to quantify the amount of habitat that may be lost; nor does it provide mitigation for the loss of frog habitat. 08-21

- The DEIR improperly defers mitigation of impacts on biological resources. For example, the mitigation measure to protect yellow warbler and olive-sided flycatcher habitat, if a nest were found before construction, requires only "modifications to the project design to avoid removal of occupied habitat while still achieving project objectives shall be evaluated, and implemented to the extent feasible." 08-22

- The DEIR improperly relies on mitigation measures that are vague or unenforceable. For example, to protect the Sierra Nevada mountain beaver and snowshoe hare, mitigation measures provide only that "buffers *may* be established" (emphasis added). 08-23

Climate change is an issue of global importance and, also, state law. Ironically, the DEIR fails to adequately evaluate the Project's significant contribution to climate change – the biggest threat to the ski industry itself. 08-24

- The DEIR downplays the Project's potential impact on climate change. Emission estimates are dramatically reduced by underestimating auto emissions from Project-generated vehicle trips and completely ignoring increased air travel.

- The DEIR inexplicably downplays the Project's generation of greenhouse gases, measured in metric tons of CO2 per year, as insignificant. The Placer County Air Pollution Control District coordinates with the Sacramento Metropolitan Air Quality Management District, which sets a clear operational threshold of significance: 1,100 metric tons of CO2 per year. According to the DEIR, the Project would generate (a grossly underestimated) 45,403 metric tons of CO2 per year. But that amount is somehow dismissed as insignificant. 08-25

- The DEIR acknowledges that Squaw Valley is not slated for development by the Sacramento Area Council of Governments' plan to comply with state climate law, notably SB 375. Yet it somehow concludes that the urbanization of Squaw Valley is consistent with state laws concerning climate change. 08-26

The DEIR fails to assess risks to public safety:

- The DEIR fails to properly analyze the Project's role in exacerbating the risk and impacts of catastrophic wildfire, avoiding adequate discussion of the challenges of evacuating an area with only one egress that would, if the project were approved, suffer gridlock under normal circumstances. It simply kicks the can of emergency evacuation further down the road, claiming that "the Placer County Department of Public Works would be involved in implementing measures to ensure acceptable traffic flow and reduce the risk of impairment to emergency evacuation routes." 08-27

- The DEIR avoids assessing the risks associated with propane storage, even though the entire project would rely on propane, and the Project would include storage of 150,000 gallons of propane in the Village. 08-28

The DEIR fails to meet additional basic requirements of state-mandated environmental assessment.

- The DEIR provides an incomplete description of the project and the project setting. For example, the document does not disclose the location of major components of the proposed development, including employee housing, a new fire station, wastewater holding tanks, and water-pumping wells. 08-29

- The DEIR incorrectly dismisses the Project's growth-inducing impacts, claiming "it would be developed in locations where there is already access to urban services." 08-30

- The DEIR fails to assess the range of alternatives required by CEQA; instead it offers only infeasible 'straw-men' versions of the existing plan. 08-31

Any one of these arguments would render the DEIR inadequate under CEQA. Combined, they build an overwhelming argument against approval of the proposed development.

Additionally, as the attached letter spells out in great detail, the Project also demonstrates a disturbing disregard for existing Placer County policies, as established by the Placer County General Plan and the Squaw Valley General Plan and Land Use Ordinance ("SVGPLUO"). 08-32

Incredibly, the DEIR finds that the Project is consistent "overall" with the General Plan, even though the Project clearly contradicts both the vision and specific language of existing County policy. For example:

- General Plan Policy 3.A.7 establishes standards to ensure traffic flow. The Project would not meet those standards and slow traffic to Level of Service F – gridlock. 08-33
- General Plan Policy 1.G.1 calls for expansion of existing ski areas where circulation and transportation system capacity can accommodate such expansions. The Project is proposed for an area that lacks the transportation infrastructure to handle thousands of new daily car trips. 08-34
- General Plan Policy Policy 6.C.6 calls for preservation of the habitats of threatened, endangered, and/or other special status species protection of significant ecological resource areas and other unique wildlife habitats. The Project, however, proposes intensive, urban development in areas identified as proposed Critical Habitat for the endangered Sierra Nevada Yellow-legged Frog. 08-35
- General Plan Policy 1.K.1. requires that new development in scenic places maintains the character and visual quality of the area. The Project and its highrises, however, would cause "significant and unavoidable" negative impacts to Squaw's legendary scenery. 08-36
- General Plan Policy 8.C.1. is designed to ensure that development in high-fire-hazard areas minimizes the risk from fire hazards and meets all applicable state and county fire standards. The Project, however, would add substantial population to areas of very high fire hazard severity, with no secondary exit and with roadways stalled at Level of Service F. 08-37

In putting forth a vision for the future of Squaw Valley, Placer County's Squaw Valley General Plan and Land Use Ordinance contains guidelines and planning principles to conserve, protect, and enhance the aesthetic, ecological, and environmental assets of Squaw Valley. The Project, however, presents a clear threat to these values, as spelled out in the "significant and unavoidable impacts" throughout the DEIR.. For example: 08-38

- Placer County's Squaw Valley General Plan and Land Use Ordinance is designed to allow "development which will not aggravate present or future traffic projects" and, even, *reduce* traffic by 50%. The Project, however, would add thousands of new daily car trips to the region's roadways, reducing traffic flow to gridlock.

- Placer County's Squaw Valley General Plan and Land Use Ordinance requires no further encroachments of buildings, impervious surfaces, or other development activity in lands designated as "Conservation Preserve". The Project, however, proposes to re-designate and develop lands that are currently protected as Conservation Preserve. 08-39

Approval of the Project would therefore violate not only CEQA but, also, the California Planning and Zoning Law and the Subdivision Map Act. 08-40

All told, the DEIR fails to fully convey the magnitude of this massive project and the extent to which it would threaten the irreplaceable values of Squaw and Tahoe – fresh air, starry skies, the natural world, mountain streams, scenic vistas, outdoor recreation – and replace them with highrise condos, traffic gridlock, and noise.

It therefore fails to meet the most basic goal of CEQA: to inform the public and decision-makers. Further assessment would require extensive revision of the document and recirculation for public comment. 08-41

Sierra Watch believes that best way to ensure legality of future land use approvals and, more importantly, a sound vision for the future of Squaw Valley, is to deny the project outright.

Again, thank you for the opportunity to participate in the public planning process.

Sincerely,

Tom

Tom Mooers
Executive Director

cc:
Senator Diane Feinstein, United States Senate
Senator Barbara Boxer, United States Senate
Representative Tom Mcclintock, United States House of Representatives
John Laird, Secretary, California Department of Natural Resources
Joanne Marchetta, Executive Director, Tahoe Regional Planning Agency
Joanne Roubique, District Ranger, Tahoe National Forest
Ed Wilson, Director of Public Affairs, California Department of Water Resources
Charlton H. Bonham, Director, California Fish and Wildlife Service
Julianne Polanco, Preservation Officer, California Office of Historic Preservation
Kevin Yount, Regional Planning Liasion and Intergovernmental Review, CalTrans
Erik Johnson, Manager of Policy and Administration, Sacramento Area Council of Governments
Laurie Kemper, Ombudsman, Lahontan Regional Water Quality Control Board
Tony Lashbrook, Town Manager, Town of Truckee
Brian Foss, Planning Director, Nevada County
Tom Christofk, Control Officer, Placer County Air Pollution Control District
Gretchen Bennit, Control Officer, Northern Sierra Air Quality Management District
Sandy Evans Hall, Executive Director, North Lake Tahoe Resort Association
John McEldowney, Program Manager, Placer County Office of Emergency Services
Michael Holley, General Manager, Tahoe Donner Public Utility District
John Johnson, President, Squaw Valley Mutual Water Company
Mike Geary, General Manager, Squaw Valley Public Service District
Sage Sweetwood, Executive Director, Planning and Conservation League
President, Truckee Chapter, Trout Unlimited
Daniel Gluesenkamp, Executive Director, California Native Plant Society
Friends of Squaw Valley Steering Committee, Friends of Squaw Valley
Lisa Wallace, Executive Director, Truckee River Watershed Council
Susan Gearhart, President, Friends of the West Shore
Brian Turner, Senior Field Officer/Attorney, National Trust for Historic Preservation
Peter Van Zant, Executive Director, Sierra Nevada Alliance
Steven Frisch, President, Sierra Business Council
Sally Brew, Squaw Valley Property Owners Association
Jenny Loda, Amphibian and Reptile Staff Attorney, Center for Biological Diversity
Daniel Heagerty, President, Granite Chief Wilderness Protection League
Ozzy Simpson, Steering Committee Member, Friends of Alpine Meadows
Darcie Goodman Collins, Executive Director, League to Save Lake Tahoe
Ed Heneveld, President, Friends of Squaw Creek
Cindy Ochoa, Chapter Chair, Tahoe Area Chapter of the Sierra Club
Barbara Williams, Chapter Chair, Motherlode Chapter of the Sierra Club
Alexis Ollar, Executive Director, Mountain Area Preservation
Bryan Elliot, Senior Vice President, KSL Capital Partners
Andy Wirth, President, Squaw Valley Ski Holdings
Chevis Hosea, Vice President of Development, Squaw Valley Real Estate

08

Sierra Watch
Tom Mooers, Executive Director
July 17, 2015

This comment letter (letter 08) summarizes the detailed comments contained in the letter prepared by Shute, Mihaly, & Weinberger LLP on behalf of Sierra Watch (letter 09). Cross-references to the corresponding detailed comments and responses for Letter 09 are provided below.

08-1 This individual comment (Comment 08-1) provides a summary of detailed comments provided in this letter and in letter 09. See responses to the detailed comments below and in letter 09.

08-2 See response to comment 08d-2

08-3 See responses to comment 08d-3

08-4 See response to comment 08-d8

08-5 See response to comment 08d-9

08-6 See responses to comments 909-122 through 09-124

08-7 See responses to comments 09-184 through 09-189.

08-8 See response to comment 09-166.

08-9 See responses to comments 09-191 through 09-199.

08-10 See responses to comments 09-135 through 09-138.

08-11 See responses to comments 09-200 through 09-206.

08-12 See response to comment 09-18.

08-13 See responses to comments 09-16 and 09-17.

08-14 See response to comment 09-34.

08-15 See responses to comments 09-34 through 09-36.

08-16 See response to comment 09-39.

08-17 See responses to comments 09-28 through 09-30.

08-18 See response to comment 09-20.

08-19 See response to comment 09-61.

08-20 See response to comment 09-33.

08-21 See response to comment 09-74.

08-22 See response to comment 09-84.

08-23 See response to comment 09-85.

08-24 See response to comment 09-140.

08-25 See response to comment 09-140.

08-26 See response to comment 09-152.

08-27 See responses to comments 09-209 through 09-215.

08-28 See responses to comments 09-216 through 09-219.

08-29 See responses to comments 09-4 through 09-6.

08-30 See responses to comments 09-269 through 09-276.

08-31 See responses to comments 09-297 through 09-305.

08-32 The comment states that because of the arguments expressed in this letter, the DEIR is inadequate and the project should not be approved. However, for the reasons discussed under the cross-referenced responses to comments 08-1 through 08-31 and 08-33 through 08-40, the analysis is adequate and no changes to the DEIR reflecting "significant new information" triggering the need for recirculation pursuant to CEQA Guidelines section 15088.5 are necessary. See also the Master Response regarding recirculation.

The second part of the comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the DEIR. Therefore, no further response is provided here. All comment letters submitted during the DEIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Regarding the project's consistency with the General Plan, see responses to detailed comments cross referenced below.

08-33 See response to comment 09-223.

08-34 See response to comment 09-225.

08-35 See response to comment 09-236.

08-36 See response to comment 09-243.

08-37 See response to comment 09-250.

08-38 See response to comment 09-253.

08-39 See response to comment 09-255.

08-40 See response to comment 09-308.

08-41 See response to comment 08-32 regarding the adequacy of the DEIR and the project approval process.