

review. Placer County has instead utilize an outdated and antiquated document and Land Use Ordinance to “the shoe-horn” in a new Specific Plan for Squaw Valley, along with a manufactured DEIR. Procedurally, and legally this is not the correct way to proceed, and gives general public limited access to their input into a General Plan that will affect their lives and potentially their livelihoods. It should also be noted, the Specific Plan itself further divorces itself away from addressing the fact that the Squaw Valley General Plan and Land Use Ordinance was prepared in 1983, for example: “The Plan Area lies within the Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) area. This Specific Plan builds upon the goals and policies set out in the SVGPLUO as well as the 1994 Placer County General Plan (General Plan) to provide a coherent road map and an implementation strategy to direct growth within the Plan Area consistent with environmental, physical, social, and economic constraints.” It’s very difficult to build upon the SVGPLUO, when the General Plan is 32 years old, and is inherently out of date guidance document for the Squaw Valley community.

I25-22
cont.

Alternatively, since project implementation will necessitate adoption of General Plan Amendments and Zone Changes, the document as currently drafted fails to fulfill the stated intent of a specific plan, as defined in the CGC.

The project is, therefore, incorrectly defined. The initial action that must occur prior to the adoption of the VSVSP (this proposed amendment would establish the required consistency between the County’s Land Use Policy Map and the proposed Project. Only limited reference is, however, provided in the Notice of Preparation (NOP), included in Volume I, Appendix A and B (revised) of the DEIR, concerning the proposed General Plan Amendment (GPA) to the Squaw Valley General Plan. As indicated in the NOP, the proposed project is a Development Program Plan that will facilitate future development of the Squaw Valley property for approximately 20-25 years (NOP, pg. 10). If construction could start (as noted in the NOP) in year 2016; then buildout would be Year 2016. The only reference to a GPA is found in the accompanying Initial Study which states that approvals to be requested from the County may include, but are not necessarily limited to, the following: general plan amendments (Initial Study, p. 12). It should also be noted that the NOP is dated October 10, 2012; and since that time period the Squaw Valley Specific Plan has gone through subsequent changes. Therefore, the

I25-23

Based upon the sequence and significance of those discretionary actions which are requisite to project approval, the Lead Agency (through the CEQA process) has failed to both accurately define the project and provide sufficient and appropriate notice about the precise nature of the pending entitlements. This failure constitutes a defect with the DEIR.

Implementation of the Specific Plan entitles certain activities which would usually require a conditional use permit or other discretionary review. As a result, implementation of the VSVSP (as now drafted) will remove the public agency’s ability to impose specific conditions upon those uses identified therein eliminate further discretionary review by the permitting agency, and preclude both the Lead Agency and other Responsible Agencies from requiring any additional environmental documentation for those activities.

I25-24

Additionally, as presently drafted, neither the VSVSP, the Applicant’s Specific Plan Land Use Ordinance, nor the DEIR provide the County or the affected public with a comprehensive set of conditions which substitute for those which would be imposed by the County should the CUP process be retained. As a result, the Lead Agency is failing to fulfill the stated purpose of the CUP by both removing that submittal obligation and by failing to compensate for that action through the imposition of similar conditions and development constraints. This action imposes a significantly greater obligation on the County, through the CEQA process, to fully address the precise characteristics of each of the proposed uses and to

formulate substitute conditions (i.e., mitigation measures; conditions of approval) which fully demonstrate that those actions are equal to or in exceedance of those which would be imposed upon those uses should the VSVSP not be approved, as now proposed.

I25-24
cont.

Under the CUP process, what conditions have historically be imposed by the County for projects involving the sale of alcoholic beverages for on-site consumption? For public dancing? For live entertainment with the sale of alcoholic beverages? For the removal of native trees? For the establishment of helistops? For grading activities? For shared or reduced parking? For hotels located within 500 feet of residential uses? For telecommunication facilities? How do the mitigation measures contained in the DEIR fully compensate for the elimination of those conditions?

As indicated in the VSVSP, the pending Specific Plan is a two part document which together constitutes the Village at Squaw Valley Specific Plan. The Specific Plan describes the basic intent of the Specific Plan and contains the written regulations and standards that will govern future development within the Specific Plan area over the next 20 to 25 years. The document further states that it permits by right certain uses or activities which now require a conditional use permit or other discretionary action...As individual projects submit applications for development permits, each will be reviewed by the County or City to verify that it complies with all regulations and operational requirements of the Specific Plan Ordinance. In addition, the Specific Plan Ordinance - includes the detailed Development Standards and Design Guidelines that will control development within the Specific Plan (VSVSP, Appendix B). Notwithstanding the importance and role of the ordinance, its adoption by the County is not specifically included among the list of discretionary actions outlined in either the NOP or in the DEIR (DEIR, p. 3-39).

I25-25

Since the adoption of the ordinance constitutes one of the major discretionary actions required for project approval and since the ordinance contains extensive land use development regulations affecting the physical development of the project site, its non-inclusion in either the VSVSP or DEIR results in a **failure to disclose** material information concerning the pending project. Pursuant to Section 21005 of CEQA, it is the policy of the state that noncompliance with the information disclosure provisions of this division which precludes relevant information from being presented to the public agency or with substantive requirements of this division may constitute a prejudicial abuse of discretion within the meaning of Section 21168 and 21168.5, regardless of whether a different outcome would have resulted if the public agency had complied with those provisions.

8.0 Squaw Valley General Plan Land Use Ordinance (SVGPLUO)

The Lead Agency's failure to provide the public reasonable access to the Squaw Valley General Plan Land Use Ordinance (Ordinance) has prevented the public from fully understanding the precise nature of the proposed project and pending application and has deprived the public of a meaningful opportunity to comment upon the potential significant environmental impacts of that action.

I25-26

Since the updated Ordinance constitutes significant new information within the meaning of Section 15088.5(a) of the State CEQA Guidelines, the Lead Agency is obligated to recirculate the DEIR and again provide notice pursuant to Section 15087 and consultation pursuant to Section 15086 of the State CEQA Guidelines. Only through recirculation and re-noticing can the public and affected public agencies be assured of adequate opportunity to compare the information in the DEIR with the efficacy of the standards and guidelines presented in the draft Ordinance.

Should the Lead Agency elect not to recirculate the DEIR, that decision must be supported by substantial evidence in the administrative record (Section 15088.5(e), CCR)? Should the County decide not to recirculate, what evidence can the Lead Agency provide supporting that determination?

I25-26
cont.

By identifying the Specific Plan Ordinance (update), what agency, individual, or entity prepared the Ordinance? Why has public access to document been restricted? How does the current document differ from any previous drafts of that ordinance? Where can evidence of the County’s independent review of be reviewed and what documentation of that review exists in the project’s administrative record?

9.0 DEIR Comments

According to the DEIR, “accordance with CCR Section 15168, this document is a **program EIR**. A program EIR is one type of EIR that can be prepared for planning projects, as well as a variety of other project types (State CEQA Guidelines Section 15168). A program EIR enables a lead agency to examine the overall effects (direct, indirect and cumulative) of a proposed project or course of action and to consider broad policy alternatives and programwide mitigation measures at an early time in the decision-making process when the agency has greater flexibility. The subject of the agency’s approval decision is the overall program addressed in the EIR. When subsequent activities in the program are proposed, the agency must determine whether the environmental effects of those activities were covered in the program EIR and whether additional environmental documents must be prepared. If a later activity would have effects that were not examined in the program EIR, a project-specific CEQA document must be prepared. The project-level CEQA documents may incorporate by reference general discussions from the broader EIR and focus on the impacts of the individual projects that implement the plan, program, or policy” (DEIR, p. 1-2). In addition, “This EIR will evaluate the environmental effects of the Specific Plan at a **program level**. Prior to approval of entitlements to develop each phase of the Specific Plan, each phase will be reviewed to determine if it is within the scope of the **program EIR**, or if additional CEQA analysis is required (DEIR, p. 1-2). It would seem illogical for the NOP to state that construction will potentially start in 2016 (NOP, p. 10), without some future level of project-level environmental review and technical analysis of the projects that will be designed and constructed within the Specific Plan.

I25-27

GHG Emissions and Climate Change (DEIR, Section 16). This section of the DEIR fails to include Executive Order B-30-15, which provides for a new and stricter Statewide GHG Reduction Target for Year 2030.

Governor Brown’s Executive Order B-30-15 (EO) states a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. The Governor’s Office website’s also included a statement accompanying this EO that calls this “the most aggressive benchmark *enacted by any government* in North America to reduce dangerous carbon emissions over the next decade and a half.” (Emphasis added) It adds: “This executive action sets the stage for the important work being done on climate change by the Legislature.” The EO also asserts that while California is currently “on track” to meet AB 32’s 2020 reduction goal (i.e., reduction to 1990 levels), the “new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal of reducing emissions **80 percent under 1990 levels by 2050**. This is in line with the scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.” Is lack of inclusion and technical analysis of the GHG Emission Goal is a substantial failure on the part of the DEIR.

I25-28

Placer County needs to describe the net effect of tree loss (over 800 trees) since trees reduce carbon dioxide in the air, thereby reducing the warming "greenhouse" effect of the gas.

I 125-29

Hydrology and Water Quality (DEIR, Section 13). Placer County needs to demonstrate, using prospective future (not historical), internationally accepted future-based climate forced and hydrological data for the specific watershed your evaluation of the following potential impacts: 1) water supplies to development on an "evolving" WY type basis; 2) anticipated quantitative reductions in snowpack accumulation and runoff, 3) extreme event hydrology including probabilistic statistics to document future riverine and beneficial use threats, 4) effect of future hydrology on existing instream standards, and 5) a future-based water balance for the watershed (e.g., what are the anticipated flux differentials, driven by climatic forcings, that skew the change in storage across future WYs)

I 125-30

Transportation and Circulation (DEIR, Section 9). Placer County states, "SR 89/Alpine Meadows Road Intersection - the side-street stop-controlled Alpine Meadows Road approach operates at LOS F during the winter Sunday p.m. peak hour due to the heavy eastbound traffic flow. Traffic control personnel are occasionally stationed at this intersection to manage traffic, but were not present during the 2012 traffic counts. This intersection features a receiving lane on northbound SR 89 for eastbound left-turns, which creates two-stage gap acceptance (i.e., cross southbound traffic into the receiving lane, and then merge with northbound traffic). Side-street delays at this intersection are in the LOS F range" (DEIR, p. 9-14). We believe that this is an understatement to the people that reside within Alpine Meadows. For example on heavy traffic days there are at least four (4) Highway Patrol officers directing traffic out of Alpine Meadows. We are suggestion that your traffic consultant consult with the local CHP officers and their historical backlog of data information concerning this and other intersections that are already impacted during winter ski season. It would seem logical that even with the widening of the new bridge and stop light being planned for this intersection at the bottom of Alpine Meadows Road, that even more traffic will be accumulate going up Alpine Meadows. Obviously, traffic accumulation due to vehicular queuing will create additional air population and the inability to have adequate protection for emergency vehicles to utilize the narrow roads going up Alpine Meadows Road. This is a potential direct effect of the Village at Squaw Valley project that the DEIR needs to analyzed for health and safety reasons to the homeowners that reside within the Alpine Meadows community. The consultant's statement that, "It is anticipated to be constructed by the County and Caltrans in 2015 and be completed in one construction season. Once this traffic signal is in place, operations would improve to an acceptable LOS D or better during all three analysis periods, and **no mitigation** would be required of the project." We are requesting that this entire analysis be investigated by the County's Traffic Engineer, and that credible information be obtained to substantiate this consultant's claims, since he obviously "lacks" local knowledge and does not live in the area of concern.

I 125-31

Visual Resources (DEIR, Section 8). The DEIR states, "This chapter describes laws, ordinances, regulations, and policies applicable to visual resources, and existing conditions regarding visual quality. Potential short-term and long-term visual impacts that could result from project construction and operation are discussed and mitigation measures are recommended as necessary to reduce potentially significant adverse effects (DEIR, p. 8-1).

I 125-32

As indicated in Section 21001(b) of CEQA, it is the declared policy of the State to take all action necessary to provide the people of the State with...enjoyment of aesthetic, natural, scenic and historic environmental qualities. Appendix G of the State CEQA Guidelines further indicates that a project will normally be judged to have a significant environmental impact if the project will: (1) conflict with adopted environmental plans and goals of the community where it is located; and/or (2) have a

substantially, demonstrable negative aesthetic effect. Since CEQA does not explicitly define a substantially, demonstrated negative aesthetic effect, the Lead Agency has attempted to manipulate the DEIR's by instead using methodologies of the U.S. Forest Service (USFS) and Federal Highway Administration (FHWA) (USFS 1995, FHWA 1981), both federal agencies.

I25-32
cont.

No information, evidence, or supporting documentation is provided which substantiates a more reasonable assessment would conclude that if one or more of those factors (i.e., contrast; prominence; coverage) were to occur, the resulting impact would be deemed significant. What documentary basis can the Lead Agency cite for its selection of its threshold criteria? Can the Lead Agency definitively conclude that there do not exist any situations or conditions when a physical change would be deemed significant in which that change did not concurrently affect two or more of the stated factors (i.e., contrast; prominence; coverage) within the affected viewshed?

Absent from either the VSVSP or the DEIR is a three-dimension drawing or computer simulations which attempts to translate the design and development policies outlined in the VSVSP into a graphic depiction of what the project may look like when ultimately developed in 25 years. In the absence of that rendering or computer simulation, it is difficult to understand how the Lead Agency undertook and completed its analysis of aesthetic and visual impacts. Why did the County not request a visual representation of the project? Has the project proponent prepared or is the project proponent preparing such a graphic, if not; then, I'm suggesting that one be prepared.

I25-33

Under CEQA, the effects of an action must be evaluated in the context of the existing conditions that exist prior to project approval. As a result, it is not merely sufficient to compare one set of existing zoning policies against a set of proposed standards and define the resulting impact as the difference between those two standards. Based on this approach, the visual effects of the post-project environment must be evaluated relative to what now exists upon the project site and not the hypothetical future condition that could exist should development proceed in accordance with existing zoning authorization.

I25-34

The visual quality of a landscape may be magnified or diminished by the visibility of the landscape from any given observation point. As a result, a landscape scene can be divided into three basis zones: foreground, middle ground, and background. Typically, objects in the foreground are more apparent to an observer and, as distances increase (i.e., as objects move toward the background), a viewer's awareness of those objects decreases. The level of significance of a modified landscape may, therefore, be dependent upon the distance from which it is viewed.

I25-35

Significant impacts could result from Project signage, which is not even discussed within this section. As indicated under Section 21002 of CEQA, a public agency shall not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The Lead Agency has failed to fulfill its obligations under CEQA in not addressing this potential impact or failing to explore a reasonable range of alternatives and mitigation measures which, if adopted, would result in the avoidance of that deleterious effect.

I25-36

For each of the significant impacts identified in the DEIR or subsequently added thereto following the Lead Agency's response to those comments submitted thereupon, do there exist additional mitigation measures and/or project alternatives (e.g., revisions to the design and development standards contained in the VSVSP) which could result in the reduction or avoidance of those impacts?

I25-37

In discounting the significance of construction-term (in some instances) aesthetic impacts, the DEIR concludes that these impact would be temporary and thus less than significant. Where in CEQA is there a specific reference to duration as a condition for the establishment of a significant adverse impact? Where in the Lead Agency's own significance threshold, as contained in the DEIR, is there a statement that an impact must be permanent in order to make that impact significant? What is the minimum time period an impact must exist before that impact would be deemed to be significant?

I25-38

Since the VSVSP constitute a 25-year development site plan for the project, the environmental analysis must evaluate not only existing land uses but also future uses which are authorized in accordance with adopted County development policies. As a result, Off-Site Shadow-Sensitive Uses Shaded in the Future by On-Site Development during Winter and the corresponding text should be modified to identify any other sensitive uses upon which a significant adverse shade/shadow impact will occur. At what maximum height limit will no adverse shade/shadow impacts occur?

I25-39

This section of the DEIR fails to no reference or provide an analysis of the potential aesthetic impacts associates with the elimination of trees on each of the subject lots. Additionally, under the Biological Resources Section of the DEIR, the "The project applicant or its selected vendor will either conduct a tree survey or use recent tree surveys to determine the number and size of trees to be removed. The number of trees to be removed will be minimized to the extent feasible." Placer County should have conducted a tree survey for the VSVSP DEIR. This type of survey should not be deferred until construction starts.

As further noted in the VSVSP, "As indicated above there are approximately 10 acres of conifer forest within the Plan Area, which represent the densest concentration of native trees. There are also small stands of trees scattered throughout the developed portions of the Plan Area. An arborist report identified approximately 800 trees over 6 inches at breast height (dbh) within the Village areas planned for development. In addition, approximately 350 trees over 6 inches dbh were identified within the development portions of the East Parcel."

Additionally, "The project applicant or its selected vendor will obtain a tree permit from Placer County, as per the County's Tree Ordinance. As stated in the Tree Ordinance (12.16.080 Replacement program and penalties), the County may condition any tree permit or discretionary approval involving removal of a protected tree upon (a) the replacement of trees in kind, (b) implementation of a revegetation plan, or (c) payment into the County's tree preservation fund. Because a project site may not support installation of all replacement trees or the implementation of a revegetation plan, the project applicant or its selected vendor could either replace trees at an off-site location or contribute to the County's tree preservation fund; this will be determined by the County." (DEIR, p. 6-71).

I25-40

Although the DEIR contains recommended mitigation measures which states, in part, that trees meeting certain size requirements will be replaced at on- or off-site locations acceptable to the governing jurisdiction, the measure further states refer to the Tree Ordinance for details of tree removal requirements. As a result of both the precise language of the Ordinance and Mitigation Measure, no assurances are provided that even one tree will be replanted to compensate for the loss of a total of trees. The payment of an undisclosed fee into the Placer County Tree Preservation Fund clearly does not constitute like-kind compensation for the loss of that significant historical, aesthetic and ecological resource within the Squaw Valley area.

"Each project that removes commercial-grade trees shall be responsible for preparation of a Timber Harvest Plan (THP), THP exemption, and/or compliance with a master THP if one is enforced. Preparation of a THP does not exempt tree removal from the County Tree Ordinance (VSVSP, 7-14).

I25-41

How does the County even know if there is commercial-grade trees without conducting a tree survey within the areas being proposed for development? It would seem logical that if there are 10 acres of conifer forest within the Specific Plan area, that some of those trees may be considered commercial grade. If so, where is the County's THP?

I25-41
cont.

As defined under Section 15370 of the State CEQA Guidelines, mitigation includes: (a) Avoiding the impact altogether by not taking a certain action or parts of an action; (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (e) Compensating for the impact by replacing or providing substitute resources or environments. Which of the above definitions of mitigation is the payment of in-lieu fees? How is the payment of a fee full compensation for the loss of a significant historical, aesthetic and ecological resource? How many birds can nest in a fee?

I25-42

What implementation plan exists to ensure that trees are actually planted rather than the funds being either retained in the Placer County's special fund or diverted for other public uses? What agency and/or department administers the special fund? How is the replacement fee to be established? Will the fee be adequate to not only compensate for the loss of each tree but to also replace the 10 acres of conifer forest potentially lost through project implementation?

Soils, Geology, and Seismicity (DEIR, Section 12)

Placer County please define the term "recent movement," as indicated by your technical consultant, "These fault traces have been mapped (Saucedo 2005, Jennings and Bryant 2010, Sylvester et al. 2012) as approximately located (dashed) and/or concealed (buried beneath alluvium, alluvial fan, and glacial till deposits). The *Placer County Local Hazard Mitigation Plan* (Placer County 2010: Annex M) indicates that one of the four unnamed faults crossing the Olympic Valley floor has documented evidence of "recent" movement ("**recent**" is not defined in the document). (DEIR, p. 12-5). How does the County not know the slip rate or potential maximum displacement if no further studies are conducted? Seismic trenching analysis should be conducted, prior to the issuance of any building permits.

I25-43

Public Services and Utilities (DEIR, Section 14)

The accelerated invasion of non-native annual grasses, along with drought, and the effects of climate change, created conditions that are leading to increased threat of wildland fires to the landscape and the more than hundreds of species of birds, plants, and animals that rely on this critically important ecosystem. It is imperative that Placer County perform a full investigation and analysis of the potential for wildland fires. The DEIR provides limited data regarding wildland fires that have occurred proximate to Squaw Valley, and what real effect (if any) could occur if a Wildfire from surround Forest Service land crossed into the valley. This issue is of tantamount importance, and needs to be adequately addressed by the County, because this issue has the potential to affect property and lives.

I25-44

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- I25** Mary Bennett
July 17, 2015
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- I25-1 The comment requested verification that the comment letter was received. It was. Also, 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.
- I25-2 As required by CEQA, written responses are provided in this FEIR to comments on environmental issues received on the DEIR that were received during the public review period (May 18 through July 17, 2015).
- I25-3 Section 1.7, "Project Review and CEQA Process," of the DEIR describes the CEQA process conducted to date for this project, including the opportunities for public involvement. Additionally, though not detailed in the DEIR, numerous public meetings and other outreach has occurred in relation to the project, both by the County and, separately, by the applicant. Several project modifications have been made as a result of this input process. The County has solicited and maximized opportunities for public participation, and has thereby satisfied CEQA.
- I25-4 Consistent with CEQA, the County will distribute the FEIR for a minimum of 10 days before any action is taken on the project, and the FEIR will be posted on the County's website. A notice of availability of the FEIR will be provided to all persons and agencies that submitted comments on the DEIR. The County is not obligated to respond in writing to comments submitted after this period.
- I25-5 Section 15105(a) of the CEQA Guidelines requires that DEIRs are circulated a minimum of 30 days, unless state agency review is required in which case the review period must be 45 days (with certain exceptions). The DEIR was circulated for public review and comment for a period of 60 days, from May 18, 2015 to July 17, 2015. The County did receive several comments within a week after the close of the review period, and while the County is not obligated under CEQA to respond to late comments, the County is nonetheless providing responses in this FEIR to those late comments (these are included in this FEIR under the category, "Late Comments"). Any comment received over a week after the close of the review period are not included in the FEIR, but responses will be provided in the staff report package that will be provided to the Placer County Planning Commission and Board of Supervisors.
- The comment requests that the DEIR review period be extended for an additional 60 days. This request was considered by the County's Environmental Coordinator and denied. As described above and in accordance with CEQA, the DEIR was circulated for public review for 60 days, which the County deems to be sufficient to provide meaningful comments and is within the required timeframes specified in CEQA. Furthermore, Section 15105(a) of the CEQA Guidelines states that, "[T]he public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances." There are no unusual circumstances associated with this project.
- I25-6 The commenter is expressing the right to submit subsequent comments. The County acknowledges the right to submit comments on the project at any time during the public review; however, all comments on the contents of the DEIR, to qualify as comments that must be responded to in the FEIR, must be provided within the 60-day review period granted on this project in accordance with Section 15088(a) of the CEQA Guidelines. All comments on the FEIR should be provided in advance of the project hearings with enough time provided

to be thoroughly considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

See also response to comment I25-5.

- I25-7 This is a comment requesting additional information and does not address the contents of the DEIR. The County provided a letter response to this comment on July 30, 2015. Furthermore, Public Resources Code Section 21167.6, subdivision (e)(10), describes which draft documents must be included in the administrative record.
- I25-8 See the Master Response regarding the SVGPLUO.
- I25-9 This is a comment requesting additional information and does not address the contents of the DEIR. The County provided a letter response to this comment on July 30, 2015.
- I25-10 The draft Development Agreement (DA) will be part of the staff report package that will be provided to the Placer County Planning Commission and Board of Supervisors. At the same time, these staff reports will be posted to the County's website where they will be publically available. A DA is an agreement between a public agency and a developer that spells out the commitments of the developer and the development entitlement assurances. While the DA may be developed, in part, based on the EIR (including commitments to finance mitigation measures), it is a financial document and is not necessary to understand the environmental impacts and mitigation measures associated with a project, and CEQA does not require it to be released at the same time as the DEIR.
- I25-11 The comment characterizes the circumstances under which CEQA requires recirculation of a DEIR. These circumstances have not arisen in response to this, or other, comments. The comment does not provide specific reasons specifying why the DEIR is inadequate, what the new information is, or why that information is significant. Therefore, a response cannot be provided. See responses below regarding the specific comments in this letter. Also, see the Master Response regarding recirculation.
- I25-12 The comment contends that the DEIR is inadequate because the project is not accurately or consistently described. The proposed project described in Chapter 3 of the DEIR is thorough, and accurately represents the project as proposed at the time that the DEIR was prepared. As discussed in Chapter 2, some changes have been made to the project since the DEIR was prepared. These changes were evaluated and found not to alter the conclusions of the DEIR (see Chapter 2 of this FEIR). The comment does not provide any specific examples of such inaccuracies or inconsistencies, or of how inaccurate or inconsistent descriptions of the project affected the analysis of impacts such that decision makers would not have sufficient information to make informed decisions on the project. Therefore, a response cannot be provided.
- I25-13 The comment contends that the DEIR does not fulfill the intent of CEQA because the effects of the project are inaccurately characterized. The comment does not provide any specific examples of where the effects of the project were inaccurately disclosed. Therefore, a response cannot be provided.
- I25-14 The comment indicates that Section 15064(e) relates to use of the questions provided in Appendix G: Environmental Checklist Form of the State CEQA Guidelines as the thresholds of significance when evaluating potential effects of a proposed project. In fact, Section 15064(e) discusses the interplay between economic and social changes resulting from a project and effects on the environment. However, it is acknowledged that the questions posed in Appendix G are guidelines outlining the topics that should typically be considered when considering the potential impacts of a project. The questions are part of the Initial

Study checklist and are used to determine if a project may have a significant impact on the environmental, but they are not performance standards.

Thresholds of significance, as established in Section 15064.7 of the State CEQA Guidelines, define a level of a particular environmental effect above which the lead agency would normally consider an effect to be significant. Thresholds can be “quantitative, qualitative or performance level” (see Section 15064.7(a) of the State CEQA Guidelines). Performance standards can be used as one form of mitigation measures formulated to reduce potential impacts below specified thresholds.

Placer County considered the thresholds of significance that were used in this EIR and found them to represent a reasonable approach. The thresholds are based on the initial study checklist (Appendix G of the CEQA Guidelines), a common approach used throughout California. As indicated throughout the DEIR, these thresholds were used to evaluate the proposed Specific Plan. In addition, the thresholds were augmented and refined with thresholds promulgated by other regulatory bodies, where appropriate (see, for example, Chapter 10, “Air Quality”). Thresholds considered and dismissed from detailed evaluation are identified in each resource evaluation under the “Issues or Potential Impacts Not Discussed Further” heading.

The comment also asserts that the questions provided in Appendix G are not adequate for use in the DEIR because they are too general to be used for project-level approval. It is key to note that the subject DEIR is a program-level DEIR. As explained on page 1-2 in Chapter 1, “Introduction,” in the DEIR:

In accordance with CCR Section 15168, this document is a program EIR. A program EIR is one type of EIR that can be prepared for planning projects, as well as a variety of other project types (State CEQA Guidelines Section 15168). A program EIR enables a lead agency to examine the overall effects (direct, indirect and cumulative) of a proposed project or course of action and to consider broad policy alternatives and program wide mitigation measures at an early time in the decision-making process when the agency has greater flexibility. The subject of the agency’s approval decision is the overall program addressed in the EIR. When subsequent activities in the program are proposed, the agency must determine whether the environmental effects of those activities were covered in the program EIR and whether additional environmental documents must be prepared. If a later activity would have effects that were not examined in the program EIR, a project-specific CEQA document must be prepared. The project-level CEQA documents may incorporate by reference general discussions from the broader EIR and focus on the impacts of the individual projects that implement the plan, program, or policy.

Further, there is not specific evidence provided to substantiate the claim that the thresholds used are too general to provide a meaningful analysis, nor does the comment suggest additional or alternative thresholds for consideration.

I25-15

The comment expresses general opinions about the conclusions reached in the DEIR, whether analysis of all feasible alternatives and mitigation measures was conducted, the consideration of available information, and the response to issues raised during previous public comment periods. No specific comments or examples of these general concerns are provided. Therefore, a response cannot be provided.

I25-16

The commenter provides information regarding the National Environmental Policy Act, which is not applicable to the proposed project. While the comment infers that the thresholds used in the DEIR were not sufficient, no comments were provided on specific thresholds in the DEIR. For information about the use of significance thresholds under CEQA, refer to response

to comment I25-14. Further, thresholds containing specific quantitative values are not required under CEQA.

I25-17

The comment asserts, generally, that the DEIR fails to include feasible mitigation measures and a range of alternatives to the project. The comment does not explain how the DEIR fails to provide a reasonable analysis, or how such an analysis would differ. The comment also fails to explain why the mitigation measures in the EIR are infeasible. Because no specific comments or examples of these general concerns are provided, a specific response cannot be provided.

Refer to Table 2-2 in the DEIR, which summarizes the significant and potentially significant impacts of the project, as well as all proposed mitigation measures. The only significant and unavoidable effect for which mitigation has not been established is the effects on scenic vistas during operation (Impact 8.1). This is because no mitigation has been identified other than reducing the height and/or density of the buildings. This is a project description change; therefore the potential to limit the height and number of structures are evaluated as alternative projects. Refer to Chapter 17, "Alternatives," for an evaluation of project alternatives.

I25-18

The comment asserts that the analysis of effects in the DEIR is technically inadequate, which hinders review of the project. The comment does not specify why the analysis of effects in the DEIR is inadequate. Therefore, a response cannot be provided.

The comment, further, provides no evidence to support the claim that the document is non-compliant with Section 21005 of CEQA, which establishes the legislative intent of CEQA relative to information disclosure, noncompliance, presumption, and findings, or Sections 21168 and 21168.5 regarding prejudicial abuse of discretion. These sections of CEQA are relevant to legislative review of actions taken by a lead agency and are not applicable to public review of the draft document. The comment does not specify what type of "relevant information" is precluded from public review.

For information about consideration of mitigation and alternatives in light of identified significant impacts, refer to response to comment I25-17.

I25-19

The comment asserts, generally, that the mitigation measures established in the DEIR would not be as effective in reducing the effects of the project as suggested in the analysis, and that the analysis does not support the conclusions reached. The comment does not state which mitigation measures are supposedly unsubstantiated or would have limited effectiveness. Without specific examples of cases where lack of information led to incorrect conclusions, a detailed response to this comment cannot be provided.

I25-20

References are noted using in-text citations throughout the DEIR. As appropriate, these references include page numbers. Full document citations that correspond to the in-text citations are provided in Chapter 20, "References." Where referenced material is key to the environmental analysis, it has been included as an appendix to the document (see, for example, Appendix C, "Water Supply Assessment" and Appendix F, "Shadow Study"). All cited references are part of the administrative record and are available from the County upon request.

I25-21

The comment provides a suggested page length for a DEIR and implies that because the DEIR is longer than this length, the comment period should have been extended. But page lengths differ for each EIR, and will typically be longer for program EIRs such as this one. The County extended the public review period from its typical 45 days to 60 days and believes this is sufficient to comment on the DEIR. The public review period complies with CEQA requirements. See response to comment I25-5 regarding the DEIR review period.

I25-22 See the Master Response regarding the SVGPLUO regarding general plan consistency as well as response to comment I25-23.

I25-23 See Section 3.5.1, “Planning Entitlements and Approvals from Placer County,” in the DEIR for a list of actions the applicant is requesting from Placer County, including any necessary amendment of the *Placer County General Plan* or the *Squaw Valley General Plan and Land Use Ordinance* to incorporate the Specific Plan. These actions are evaluated throughout the DEIR as components of the project. As indicated on page 3-39 of Chapter 3, “Project Description,”

The VSVSP proposes redesignating the project site as “Specific Plan” in the SVGPLUO (the General Plan defers to community plans, such as the SVGPLUO, for land use designations and zoning). As stated in the *Placer County General Plan*, “Specific plans provide a bridge between the goals and policies in the General Plan and specific development proposals, and incorporate detailed land-use development standards and design criteria” (Placer County 2013:14). In the case of the VSVSP, a Specific Plan is proposed to create a single, coordinated plan for the plan area as a whole, providing for a well-integrated land use plan, necessary infrastructure and utilities, an integrated pedestrian/bicycle/skier circulation plan, protected open space and view corridors, and a visually cohesive village.

In addition to revising the land use designations and zoning and adoption of the VSVSP, there is a proposed amendment to the text of the SVGPLUO to address avalanche hazards. The text of the proposed amendment is discussed in Impact 4-2 on pages 4-24 and 4-25 of the DEIR. 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. For a detailed evaluation of the potential effects of these amendments, refer to Impact 4-2 in Chapter 4, “Land Use and Forest Resources,” in the DEIR. Further, it should be noted that the comment uses an incorrect definition of the term “buildout,” in that it interprets buildout to refer to the start of construction rather than completion of the project.

The comment also asserts that the DEIR fails to accurately define the project and provide sufficient notice about the nature of pending entitlements, but does not explain what aspects of the project were inaccurately defined or how notice was inadequate, and therefore a detailed response cannot be provided.

I25-24 As indicated on page 3-40 of the DEIR:

Code and Section 15182(a) of the State CEQA Guidelines provide that no EIR or negative declaration is required for any residential project undertaken in conformity with an adopted Specific Plan for which an EIR has been certified. If it is determined that a development application is inconsistent with the Specific Plan and/or substantial evidence exists that supports the occurrence of any of the events set forth in Section 21166 of the Public Resources Code and Section 15183 of the State CEQA Guidelines, a determination will be made as to the appropriate subsequent environmental document. Examples of subsequent approvals include small lot tentative maps, Specific Plan amendments, Conditional Use Permits, Tree Permits and Design/Site Review applications. Chapter 8, “Implementation,” of the Specific Plan lays out in detail the Subsequent Conformity Review process the County will follow to determine whether a proposed subsequent approval is consistent with the

Specific Plan and EIR assumptions, and the extent to which amendments to the plan, and/or additional CEQA analysis are needed.

All project phases would be subject to discretionary review in accordance with Section 8.3.4 of the Specific Plan (Subsequent Entitlement Process) and no project phase could be implemented without first receiving approval of a Small Lot Tentative Map and/or Conditional Use Permit, both of which are discretionary approvals subject to CEQA. Examples of discretionary entitlements include, but are not limited to, Large Lot Tentative Maps, Small Lot Tentative Maps, Conditional Use Permits, Minor Use Permits.

The comment contains questions in the last paragraph that do not address the adequacy of the EIR.

125-25

The commenter states that the VSVSP would permit by right certain land uses or activities that currently require approval of a conditional use permit or other discretionary action under the SVGPLUO. The commenter provides no specific example, so no specific response can be provided. However, Table 3.2 of the VSVSP lists all land uses proposed for the VSVSP. The majority of allowed land uses are permitted with approval of a conditional use permit, minor use permit, or other discretionary action, which would occur following approval of a small lot tentative map for a specific development phase and construction of required improvements. The commenter further states that project development within the plan area would be in accordance with the VSVSP Appendix B Development Standards and Design Guidelines, that adoption of this document is not included among the list of discretionary actions listed in the DEIR and that this results in a failure to disclose material information concerning the project. Under DEIR Section 3.5.1, "Planning Entitlements and Approvals from Placer County," eight discretionary actions are listed as required by the County to approve the project. Amendment to the SVGPLUO is the third bullet point under Section 3.5.1 of the DEIR and is analyzed throughout the DEIR (for example, refer to Impact 4-2 in Chapter 4, "Land Use and Forest Resources"). In addition, under this same section, the fifth and sixth bullets state, "Adoption of the proposed Specific Plan and Design Guidelines" and "Adoption of the Specific Plan Development Standards."

125-26

The comment suggests that reasonable public access to the SVGLUO was not provided. The plan is available at the County offices, upon request from the County, and on the County website via a web search (<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/NTahoeCPs/SquawValleyGP/SquawValleyGenPlan1stPart.pdf>); it can be accessed by reasonable means. The proposed revisions to the SVGPLUO are identified in the DEIR and fully analyzed in the document. As indicated in Section 3.5.1, "Planning Entitlements and Approvals from Placer County," of the DEIR, these include amending land use designations and amendments to the text of the SVGPLUO to better reflect current avalanche risk data within the project boundary.

No evidence is provided to support recirculation of the DEIR, which CEQA requires when the lead agency adds "significant new information" to an EIR after public notice is given of the availability of a DEIR for public review, but before EIR certification (State CEQA Guidelines CCR Section 15088.5). Also, see the Master Response regarding recirculation.

The comment further states that public access to the proposed Specific Plan has been restricted. Going back to at least October 2013, the County has maintained a webpage dedicated to dissemination of information on the Village at Squaw Valley Specific Plan at: <http://www.placer.ca.gov/departments/communitydevelopment/planning/villageatsquawvalleyspecificplan>. Numerous resources are posted at this site including project background information, download links for the Specific Plan, information on public meetings, and contact information for County staff assigned to the project. This information is also available

upon request from the County Community Development Department. These resources and information adequately answer the comment's questions.

- I25-27 The construction period described in the DEIR is an expression of the applicant's proposal. As indicated in the comment, each phase of development will undergo review to determine if it is within the scope of this program EIR, or if additional analysis is required under CEQA before the County approves project level entitlements, which would be required for each phase of project implementation.
- I25-28 The comment states that the DEIR fails to address Executive Order B-30-15 in its analysis of the project's greenhouse gas emissions. See response to comment 09-153 which addresses Executive Order S-3-05 and B-30-15. Please note that the executive order was released around the same time the DEIR was also released. Also note that, while the act was intended to "set the stage" for Legislative action, the bill that would have legislated the executive order (Senate Bill 32) did not have sufficient votes to pass in the 2015 Legislative session. Regardless, the DEIR addresses the need to target GHG thresholds to meet adopted targets, even those not currently known, if it is feasible to do so. The EIR has been revised, in Section 2.3, "Revisions to the DEIR," to add in this executive order. See the discussions on pages 16-17 and 16-18 and Mitigation Measure 16-2 on page 16-19 of the DEIR. See also the Master Response regarding the GHG analysis.
- I25-29 The comment states, "Placer County needs to describe the net effect of tree loss (over 800 trees) since trees reduce carbon dioxide in the air, thereby reducing the warming 'greenhouse' effect of the gas." It is unclear how the commenter derived the estimate of over 800 trees removed as the DEIR expresses tree removal in terms of acreage of forest habitat types removed (see Chapter 4, "Land Use and Forest Resources," and Chapter 6, "Biological Resources"). Regardless, the loss in carbon sequestration from the removal of trees and other vegetation is accounted for under Impact 16-2, which begins on page 16-15 of the DEIR. See the line in Table 16-2 on page 16-16 for "Loss in Carbon Sequestration from Vegetation Removal." The method used to estimate the loss in sequestration is presented on page 16-13 of the DEIR. Also, see Mitigation Measure 16-2 on page 16-19 of the DEIR.
- I25-30 See the Master Response regarding water supply for a discussion of climate change and water supply.
- I25-31 The comment questions the statement in the DEIR (page 9-14) that traffic control personnel are "occasionally stationed" at the SR 89/Alpine Meadows Road intersection." This statement from the DEIR is consistent with the commenter's statement that "on heavy traffic days there are at least four (4) Highway Patrol officers directing traffic out of Alpine Meadows." Both the DEIR and the commenter's statement are in agreement that persons directing traffic at the SR 89/Alpine Meadows Road intersection are not present at all times, or every day, but "occasionally" or on "heavy traffic days." Although the DEIR does not identify a specific number of traffic control personnel at the intersection, this information is not necessary for the DEIR as it would not influence the characterization of traffic conditions (e.g., operational parameters, LOS) and would not influence the analysis of traffic impacts. Additionally, direct coordination with local CHP officers to gather data they may have on intersection and roadway conditions, as suggested by the commenter, would not further the impact analysis in the DEIR. As described in various locations in Section 9.1, "Environmental Setting," (DEIR pages 9-1 through 9-25) multiple well-established methods were employed to collect data on existing traffic conditions in the analysis study area, including direct traffic counts (i.e., tube traffic counters placed across roadway segments), review of reports and materials prepared by Caltrans, and field observations by the traffic engineers and others. Although local CHP officers would be expected to have an intimate understanding of local roadway conditions, available data (e.g., numbers of citations, days providing traffic control services, accident data) would not be compatible with vehicle count and similar data

incorporated into traffic modelling. However, CHP (Truckee Area) did provide comments on the DEIR. See comment letter S3 in this FEIR for the CHP comments and responses to those comments.

Regarding the effects of the proposed project on the SR 89/Alpine Meadows Road intersection, Impact 9-3 in the DEIR (page 9-59) identifies that vehicle trips generated by the proposed project would have a significant adverse effect on operation of this intersection. When the DEIR was prepared, the intersection operated at LOS F during the peak hours included in the DEIR traffic analysis, and the proposed project would increase delays above significance thresholds. As indicated in the DEIR, projected increases in delay would be 96 seconds or larger. This impact discussion applies to all roadway approaches to the intersection, including eastbound travel on Alpine Meadows Road. However, Mitigation Measure 9-3, constructing the planned traffic signal at the SR 89/Alpine Meadows intersection, would reduce this impact to a less-than-significant level. As identified in the discussion of Mitigation Measure 9-3, installation of this signal would improve the level of service at this intersection to LOS D, with vehicle trips from the VSVSP included. Therefore, with the signal, and with project generated vehicle trips, intersection operations during peak periods would be better than existing conditions, where the intersection operates at LOS F. Since publication of the DEIR, the signal has been installed and is operational. Therefore, the significant and unavoidable conclusion for Impact 9-3 in the DEIR, because it could not be assured that the signalization project would be completed before the identified delays occurred, no longer applies. The impact is now less than significant because traffic generated by the proposed project would not result in significant delays at the SR 89/Alpine Road intersection.

These LOS projections are derived from well-established traffic models approved by both Placer County and Caltrans. A County traffic engineer did review and provide input on the DEIR traffic analysis; see Chapter 19, "Report Preparers," Placer County (Lead Agency), Richard Moorehead, Department of Public Works. The results of the traffic modeling constitute substantial evidence sufficient to support the impact analysis and conclusions in the EIR. In regards to traffic analyses, as well as all elements of environmental impact evaluation, residence in the vicinity of a project site is not a prerequisite or necessary to providing a comprehensive and accurate analysis of environmental effects.

- 125-32 The comment expresses a misunderstanding of the analysis of potential aesthetic impacts in Chapter 8, "Visual Resources" of the DEIR, particularly in regard to the selection of criteria used for that analysis. As indicated on page 8-45, the significance criteria are based on the Placer County CEQA checklist and Appendix G of the State CEQA Guidelines. To evaluate the project pursuant to these thresholds, the DEIR uses general terms and methodologies developed by the U.S. Forest Service and Federal Highway Administration, as described on page 8-46. Therefore, these methodologies were used to evaluate the project pursuant to established CEQA thresholds; they were not used as substitutes for the thresholds themselves.
- 125-33 As described in detail on page 8-46 of the DEIR, the visual simulations included in the document were all based on three-dimensional computer modeling, and the modeling results are adequately captured in the DEIR exhibits. Please see the relevant discussion, as well as the simulated depictions of the project on Exhibits 8-9 through 8-20. Eleven different viewpoints and one nighttime view are simulated.
- 125-34 The analysis in Chapter 8, "Visual Resources" of the DEIR makes no effort to compare the project to a development that could occur without project implementation. Instead, pursuant to CEQA, project effects are presented relative to baseline conditions (i.e., site conditions at the time the NOP was released).

- The relative visual quality of development under the project compared to existing zoning is, however, addressed in Chapter 17, “Alternatives,” as part of the discussion of the No Project—SVGPLUO Development Alternative (see page 17-21 of the DEIR).
- I25-35 The comment contains an observation relative to visual effects and viewing distance. This statement is noted and consistent with the analysis in Chapter 8, “Visual Resources” of the DEIR.
- I25-36 The comment contends that signage is not evaluated in the visual analysis. This is incorrect. Impact 8-2 acknowledges that development in the main Village “that includes buildings, landscaping, and signs that are incongruous with the natural setting and inconsistent in design could reduce the quality of views,” and that “signage along the Squaw Valley Road frontage [of the East Parcel] would reduce visual quality by partially blocking views of forested areas to the north.” These effects are mitigated through Mitigation Measure 8-2b, which would ensure that all project phases are compatible with the Plan Area Development Standards prescribed in Appendix B of the VSVSP by requiring that the project applicant obtain Design Review approval from the Placer County Design/Site Review Committee prior to submittal of Improvement Plans or Building Permits. Review and approval by the County would apply to such project components as: colors, materials, and textures of all structures; landscaping; signs; exterior lighting; and entry features.
- I25-37 The commenter asks if additional alternatives or mitigation have been added to the EIR in response to comments. No additional alternatives have been added to the EIR. Mitigation has been modified where appropriate in response to various comments and suggestions. Please see Section 2.3, “Revisions to the DEIR,” of this FEIR. As described therein, many of the modifications would result in the reduction of impacts.
- I25-38 No specific examples could be identified in Chapter 8, “Visual Resources,” of the DEIR where construction impacts were determined to be less than significant based solely on their temporary nature, as contended by the comment. Rather, construction impacts were determined to be significant or potentially significant during construction before mitigation for all impacts evaluated except shadowing (which is an issue related to operation). Refer to pages 8-47 through 8-60 of the DEIR. The DEIR concludes these impacts are, for the most part, significant and unavoidable.
- I25-39 The shadow study (Appendix F to the DEIR) reflects full build-out of the project, and is used in Chapter 8, “Visual Resources,” of the DEIR to determine potential environmental effects compared to baseline conditions. The baseline used to determine potential impacts is the condition at the time the NOP was released (as described in the “Environmental Setting” for each resource). This practice is consistent with the State CEQA Guidelines (Section 15125 [a]). Use of a future baseline for evaluations (e.g., conditions anticipated at the time of build-out) has not generally been considered an appropriate practice by the courts (see, for example, Sunnyvale West Neighborhood Associated v. City of Sunnyvale City Council).
- The cumulative effects of the project (i.e., the effect of the project when considered in conjunction with anticipated future development) are discussed in Chapter 18, “Other CEQA Sections.” Refer to page 18-16 of the DEIR for an evaluation of the project’s cumulative contribution to additional shadowing on existing structures or facilities during a substantial portion of the day. The comment asks at what maximum height limit would no adverse shade or shadow impacts occur. Because the analysis of the buildings as proposed concludes that there would not be a significant impact from project-generated shadows, it is not necessary to determine the height at which shadow impacts would be avoided entirely.
- I25-40 See response to comment I42-4 regarding tree removal.

The comment states that the DEIR fails to analyze potential aesthetic impacts associated with tree removal. Removal of trees was considered in the analysis of the project's potential impacts to visual resources. As described in Section 8.3.2, "Methods and Assumptions," of Chapter 8, "Visual Resources," in the DEIR (page 8-46), "[b]uildings, trees, and other existing features that would be removed by the proposed project were removed from the 3D model and from the source image/photo used for the simulation." These simulations were the basis of the subsequent evaluation, particularly with regard to Impact 8-3 (Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway).

The comment also states that payment into the Placer County Tree Preservation Fund does not constitute in-kind compensation for the loss of trees associated with the project. This comment misinterprets the impacts. Impact 6-9 (Tree removal) is related to the following significance criteria: conflict with any local policies or ordinances that protect biological resources, including oak woodland resources (see page 6-35 of the DEIR). As discussed under Impact 6-9, construction associated with the Specific Plan would result in the removal or damage of trees for project facilities and the Squaw Creek restoration. The removal of protected trees within riparian zones or where 50 percent of trees are removed in a parcel would require a tree removal permit per Placer County Ordinance 12.16. The removal of trees greater than 6 inches diameter at breast height (dbh) to achieve a land conversion would require a tree cutting permit per Placer County Ordinance 12.20. To reduce these impacts, Mitigation Measure 6-9 (see page 6-71 of the DEIR) contains requirements set under Placer County Code of Ordinances 12.16.080, which states that

the County may condition any tree permit or discretionary approval involving removal of a protected tree upon (a) the replacement of trees in kind, (b) implementation of a revegetation plan, or (c) payment into the County's tree preservation fund. Because a project site may not support installation of all replacement trees or the implementation of a revegetation plan, the project applicant or its selected vendor could either replace trees at an off-site location or contribute to the County's tree preservation fund; this will be determined by the County.

As further stated in Mitigation Measure 6-9, a tree replacement mitigation fee of \$100 per diameter inch at breast height for each tree removed or impacted or the current market value, as established by an Arborist, Forester or Registered Landscape Architect, of the replacement trees, including the cost of installation, shall be paid to the Placer County Tree Preservation Fund. See also response to comment I25-42.

I25-41 See response to comment S1-1 regarding the need for a Timber Harvest Plan (THP). Tree surveys were performed for the project by Under the Trees Forestry and Environmental Services in 2011 and 2012. Results of these surveys are described in Chapter 6, "Biological Resources," of the DEIR (see Impact 6-9 in particular). The reports documenting the results of the surveys were cited in the DEIR and included in the DEIR reference materials available from the County. These reports identify the species, diameter at breast height (dbh), and health and condition of all the surveyed trees. This information can be used to identify potential commercial-grade trees. The tree surveys show multiple healthy trees, of species suitable for lumber, with dbh greater than 20 inches. Therefore, there are marketable trees on the project site.

I25-42 The use of in-lieu fees associated with tree removal is discussed in response to comment I25-40. The Placer County Tree Preservation Fund is described in Placer County Ordinance 12.16.080(l) as follows:

A tree preservation fund is established for Placer County. The moneys received in lieu of replacement of illegally removed or damaged trees shall be forwarded to the

county treasurer for deposit in the tree preservation fund. Under no circumstances shall the funds collected by the county treasurer for deposit into the tree preservation fund be directed to any other fund to be used for any other purposes other than the planting of or maintenance of trees on publicly owned property, easements of rights-of-way, or used for educational programs or materials. A certain percentage of the fund (as determined by the board of supervisors) may be used for enforcement of the article and/or land acquisition.

This measure includes elements that rectify the impact, reduce the impact by preservation actions, and compensate for the impact by providing replacement resources. As stated in response to comment I25-40, implementation of Mitigation Measure 6-9 would ensure that the project is consistent with Placer County Ordinances, and reduce Impact 6-9 (Tree removal) to a less-than-significant level. The commenter's questions regarding the use of funds to reduce historical, aesthetic and ecological resource impacts do not address specific mitigation measures in the DEIR.

I25-43

Although the Placer County Local Hazard Mitigation Plan (Placer County 2010: Annex M) indicates that one of the four unnamed faults crossing the Olympic Valley floor has documented evidence of "recent" movement, without specifically defining the term "recent," as discussed on page 12-5 of the DEIR, the concepts of recency and recurrence are commonly used when characterizing the potential risk of fault rupture. The more recently a particular fault has ruptured, the more likely it will rupture again. In geologic terms, "recent" refers to the Quaternary time period, which extends from approximately 2.5 million years ago to present.

As discussed on page 12-14 of the DEIR, the Alquist-Priolo Earthquake Fault Zoning Act defines "active" faults as having one or more segments or strands showing evidence of surface displacement during Holocene time (defined for purposes of the act as within the last 11,000 years). A fault that has not had activity during the Holocene epoch, or pre-Holocene faults, are considered inactive. As further described on page 12-5, two Fault Evaluation Reports have been prepared to supplement the information available from the County. These reports identified two fault traces that are considered pre-Holocene and inactive, and two additional fault traces believed to cross the site that may also be pre-Holocene but require still further evaluation. A final fault evaluation would be prepared with implementation of Mitigation Measure 12-1, as described in the DEIR. The focused study would determine whether the on-site traces are active and provide recommendations, including setbacks, or reconfigurations of building layouts if needed. The recommendations of the fault evaluation would be implemented during preparation of proposed Improvement Plans.

I25-44

Wildland fire hazards are addressed in Chapter 15, "Hazards and Hazardous Materials," of the DEIR. Refer, specifically to the evaluation of Impact 15-6 (Expose people of structures to a significant risk of loss, injury, or death involving wildfires). In addition, an Emergency Preparedness and Evacuation Plan (EPEP) for the VSVSP is being prepared and will be provided to the County Board of Supervisors prior to their consideration of project approval. The EPEP will characterize existing and future wildfire risk, existing actions and mechanisms to reduce wildfire risk (e.g., fuels management requirements), additional measures to reduce wildfire risk, and wildfire response actions such as mechanisms for agency coordination and evacuation measures. Information on the EPEP has been added to the discussion of Impact 15-4, as shown in FEIR Section 2.3, "Revisions to the DEIR." Also, the EPEP is discussed in the Master Response regarding traffic.

I26

Maywan Krach

From: Julie Bernyk <jbernyk@gmail.com>
Sent: Friday, July 17, 2015 9:39 AM
To: Placer County Environmental Coordination Services
Subject: Concerns over Squaw Valley Development

Placer County Community Development Resource Agency
Attention: Maywan Krach
3091 County Center Drive, Suite 190
Auburn, CA 95603

July 16, 2015

To Maywan Krach:

I moved to Tahoe 30 years ago to ski at Squaw Valley because I had skied there since I was a child and fell in love with it. This coming season will be my 31st consecutive pass at Squaw and 20 plus years a locker member. It hurts me to the core that the place I know and love will be changed so drastically. I am concerned with the overwhelming plans for development at Squaw Valley, and with KSL in general as a company. Other concerns I have are water, construction for 25 years, environment and the scope of the project

I have never been a very good writer or at expressing how I feel in the way I would like it to come across, but here it goes. I have looked at the plans for Squaw Valley development and know enough to be very concerned, partially because KSL strikes me as the type of company who will sell their ownership of Squaw and leave the community as soon as they get things set up with permits etc and make money, that's what they are in it for. I have never gotten a genuine or honest feeling from Andy Wirth; he seems to be a wolf in sheep's clothing. Between the fight against the incorporation of Olympic Valley to the false letters of praise about Andy Wirth in the Sierra Sun, which were written by Andy Wirth, makes it difficult to trust him. As soon as they get what they want they will be gone, that is business, not a company interested in community.

I26-1

Water studies have been done to assure that there is enough water in SV to sustain the number of beds that are to be constructed, how can we be sure there will be enough water with the continuing drought. Nobody knows how the weather pattern will continue, and studies are good but honestly a guess. Water is definitely something to deeply consider as you decide to approve the KSL plans. Water is more important than money.

I26-2

The thought of 25 years of construction is unthinkable. The delicate balance of the valley and meadow will be disrupted and possibly be irreversibly damaged. I know that every Christmas week and every 4th of July I see damage done to our environment with trash & cigarette butts, in which 4,000 butts were cleaned off Tahoe beaches after this last 4th of July holiday. This is two exceptional weeks of the year stretched over the entire area. If we allow Squaw to develop as planned and bring more people into the valley on a more regular basis it could be as disastrous to the environment as Christmas and 4th of July, but on a year round basis. I am very aware of the value of our visitors and realize we need them to survive up here, they are why we can live here, but too many at once is destructive. Trust me I've seen it over and over.

I26-3

Finally, the scope of the project is just too big! We want our children to be able to drive into the valley and see the mountains, not buildings. Why would you construct a fake river when there is a natural river just 5 minutes away? It doesn't make sense except if you want to control the money coming into the area. I am also concerned about sustainability for the long run, what if the opposite happens of my concerns stated above, and we build all these buildings and create this mess and then no one comes, or not as many come as planned, that would be a big problem in a whole different way.

I26-4

This letter may not be as technical as some you will read but it truly comes from my heart and soul and love for Squaw Valley. How extraordinary would it be if Placer County paved the way to a new way of responsible development starting here in Squaw Valley, it would be a precedence that hopefully many other new development areas could and maybe would follow, it's exciting to think about. **Please do the right thing and tell KSL to submit new plans that are significantly scaled back, environmentally responsible, and appropriate for the culture and community you find in Squaw Valley.**

Thank you for your time and consideration,

Julie Bernyk

Carnelian Bay, CA

I26

Julie Bernyk
July 17, 2015

- I26-1 The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.
- Also, the comment provides an opinion regarding the merits or qualities of the proposed project and does not address the content, analysis, or conclusions in the DEIR. The Placer County Planning Commission and Board of Supervisors will take the commenter’s opinions into consideration when making decisions regarding the project.
- I26-2 See the Master Response regarding water supply.
- I26-3 See the Master Response regarding the 25-year construction period.
- I26-4 The comment provides an opinion regarding the merits or qualities of the proposed project and does not address the content, analysis, or conclusions in the DEIR. The Placer County Planning Commission and Board of Supervisors will take the commenter’s opinions into consideration when making decisions regarding the project.