I33 Ingrid & David Bourke
July 17, 2015

I33-1 The comment provides an opinion that the project should not be approved based on the number of significant impacts identified in the DEIR, with reference to the 12 project impacts and 11 contributions to cumulative impacts that would potentially be significant and unavoidable. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project.

I33-2 The evaluation of cumulative effects takes into consideration the additive impacts generated by probable future projects identified at the time the Notice of Preparation is released (i.e., baseline conditions). As explained in Chapter 18, "Other CEQA Sections," of the DEIR (page 18-1), probable future projects are those in the project vicinity that have the possibility of interacting with the proposed project to generate a cumulative impact and either: are partially occupied or under construction; have received final discretionary approvals; have applications accepted as complete by local agencies and are currently undergoing environmental review; or are otherwise considered likely to be developed. Refer to the Master Response regarding the cumulative analysis for information specific to the Alpine Sierra, White Wolf, and Gondola projects.

I33-3 See the Master Response reading the visual impact analysis for a discussion of the potential for the proposed development to change the character of the Valley.

I33-4 See the Master Response reading the visual impact analysis for a discussion of the project's contribution to degraded views of the night sky and the potential for light pollution.

I33-5 The potential for the project to affect surface water quality is addressed in the evaluation of Impacts 13-1, 13-2, and 13-7 in Chapter 13, "Hydrology and Water Quality," of the DEIR. The project's contribution to cumulative effects on surface water quality are evaluated in Chapter 18, "Other CEQA Sections," and determined to be less-than-significant (see Impacts 18-36 and 18-38). Refer to the DEIR for further discussion.

I33-6 The potential for the project to effect water supply is addressed in the evaluation of Impacts 13-4 and 13-5 in Chapter 13, "Hydrology and Water Quality," of the DEIR. The project's contribution to cumulative effects on water supply are evaluated in Chapter 18, "Other CEQA Sections," and determined to be less-than-significant (see Impact 18-37). Refer to the DEIR for further discussion.

I33-7 As described in the evaluation of Impact 9-5 (Impacts to Caltrans Highways) in Chapter 9, "Transportation and Circulation," of the DEIR, the project would result in a significant and unavoidable impact to the operation of SR 89. This would also result in a significant and unavoidable cumulative impact (see Impact 18-22 in Chapter 18, "Other CEQA Sections." Although the *State Route 89 Transportation Corridor Concept Report* (Caltrans 2012) identifies the segment of SR 89 between Deerfield Drive and West River Street as an area that may be expanded from two to four lanes, such a widening project is not currently included in any adopted planning documents or fee programs. Refer to the DEIR for further discussion.

I33-8 As indicated on page 8-41 in Chapter 8, "Visual Resources," views of the Valley floor are generally limited for those traveling on the trail in the Granite Chief Wilderness Area due to terrain and vegetation. Effects related to light pollution are addressed in the Master Response reading the visual impact analysis. The projects' contribution to significant and

unavoidable cumulative noise effects during construction and operation are evaluated in Chapter 18, "Other CEQA Sections" (see Impacts 18-31 and 18-32).

I33-9 See responses to comment letter O8c regarding impacts to Sierra Nevada yellow-legged frog.

I33-10 See response to comment I42-7 regarding impacts to the Loyalton-Truckee deer herd.

I33-11 See response to comment I3-5 regarding impacts to American black bear habitat.

I33-12 The comment is a listing of cumulative impacts evaluated in the DEIR. No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is provided here.

I33-13 The comment is a concluding statement and does not address the content, analysis, or conclusions in the DEIR. Therefore, a response is not provided here.

I34

Maywan Krach

From: David Brew <dabrew30@gmail.com>
Sent: Friday, July 10, 2015 3:49 PM
To: Placer County Environmental Coordination Services
Cc: David Brew
Subject: Comment on Draft Environmental Impact Report, Village at Squaw Valley Specific Plan, State Clearinghouse # 2012102023
Attachments: 15.07.10 dab's dEIR recharge comments

Maywan Krach;

The subject comment is attached. It is also pasted in below.

David A. Brew Ph.D.
2015.07.10.1735

¶ SECTIONs 13.1.3, 13.3.1, and 13.3.2; Groundwater, pp. 13-13 to 13-14, 13-43; Exhibit 13-7: This Draft Environmental Impact Report has a glaring omission in that it does not recognize appropriately THE CRITICAL ROLE OF THE VALLEY-SIDE RECHARGE AREAS, especially the one close to the mouth of Shirley Canyon, have in maintaining the abundance and quality of water in the Squaw Valley aquifer. THE PROPOSED PLAN WOULD HAVE A SIGNIFICANT, UNAVOIDABLE, AND NONMITIGATIBLE IMPACT.

There is a glaring omission in this section, which purports, in part, to describe the sources and characteristics of the recharge to the Squaw Valley aquifer. That omission is, although many obfuscating words are used that concern wells, that the authors neglect to fully describe the recharge areas, nor the negative effects that the proposed development would have on them. I34-1

The authors admit that the recharge areas have not been fully studied; therefore their conclusions are at best tentative and incomplete. *Exhibit 13-7 (Recharge zones)* is especially misleading in that the studies of Moran (ref) clearly indicate that the major recharge is coming from about the 6300-foot contour and lower, the exhibit shows recharge areas only up to about the 6200-foot contour; a small but critical failure. Further, that exhibit does not show what is likely the most important recharge area: the relatively undisturbed and topographically flat area north of the head of Shirley Canyon.

The *"Significance Criteria" (p.13-43)* are clear that development must not substantially deplete groundwater supplies, yet the proposed "neighborhoods" structures and roads would more than substantially interfere with the natural recharge and thus deplete the Squaw Valley aquifer. I34-2

The *Methods and Assumption/Policies... section (p. 13-44)* does not even mention the recharge areas! The *Impact Analysis (p.13-45 et seq.)* also does not anywhere mention protection of any kind for the recharge areas. I34-3

The *Mitigation Measures section, Groundwater recharge and storage (p. 13-53)* uses an weak and confusing argument based on percentages of impervious areas to avoid discussing the real effects that structures and roads would have on the prime Shirley Canyon recharge area. Even so, I have checked their percentages and found them spurious, mainly because they have incorporated large areas that are not part of the recharge area into their calculations, and in part because of discrepancies between my smaller estimates of undisturbed land and their smaller estimates of I34-4

1

impervious areas in the vicinity of this prime recharge area.

THESE ARE SIGNIFICANT, UNAVOIDABLE, AND NONMITIGATIBLE IMPACTS. The developer must re-design the proposed development in the Shirley Canyon area to eliminate all of the so-called "neighborhoods" and their appurtenant roads, propane tanks, and all other infrastructure.

I34-4 cont.

(This comment is from **David A. Brew Ph.D**., U.S. Geological Survey Senior Research Geologist, Retired; State of California Licensed Professional Geologist No. 2716. I have been a Squaw Valley homeowner since 1964 (with one interruption) and currently live at 1540 Lanny Lane in the valley. As a USGS Geologist I have had a great variety of field geologic and also administrative experiences. For over 15 years I have regularly attended Squaw Valley Public Service District, Squaw Valley Mutual Water Company, Squaw Valley Municipal Advisory Council, and Squaw Valley Design Review Committee meetings. I currently represent the Squaw Valley Mutual Water Company of the Technical Review Committee that monitors the quality of water in the aquifer below the golf course at The Resort at Squaw Creek.)

2

I34 David Brew, PhD
July 10, 2015

I34-1 The comment states that the DEIR does not include groundwater recharge from the sides of the Valley. The DEIR includes a description of this recharge source on page 13-13 along with a presentation of the recharge inputs to the numerical groundwater model. The comment also refers to recent studies that analyzed recharge mechanisms in Squaw Valley (Moran 2013 and Hydrometrics 2013a) as they relate to recharge in the groundwater model. These studies provided basic information regarding the elevation at which precipitation recharging the aquifer occurs, but made no specific conclusions regarding the locations at which recharge occurs. The recharge zones referred to in Exhibit 13-7 of the DEIR provide appropriate representation of recharge to the aquifer. These recharge zones are used in the calibrated and peer reviewed numerical groundwater model.

I34-2 See the Master Response regarding water supply for information about recharge areas.

I34-3 See the Master Response regarding water supply for information about recharge areas.

I34-4 The comment provides an opinion regarding the design of the proposed project and the data used in the analysis effects on recharge areas. See response to comment I34-1 regarding the geographic distribution of recharge and response to comment O2-65 regarding the evaluation of changes to recharge as a result of the project. See the Master Response regarding water supply for information about the effect of the project on recharge areas. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project. No further response is provided here.

I35

Maywan Krach

From:	David Brew <dabrew30@gmail.com>
Sent:	Sunday, July 12, 2015 1:55 PM
To:	Placer County Environmental Coordination Services
Cc:	David Brew
Subject:	Comment on Draft Environmental Impact Report, Village at Squaw Valley Specific Plan, State Clearinghouse # 2012102023
Attachments:	15.07.11 dab's dEIR comments on re-zoning

Maywan Krach:

The subject comment (on re-zoning) is attached. It is also pasted in below.

David A. Brew Ph.D.
2015.07.11.1555

¶ SECTIONS 4.1.6, 4.1.7: This Draft Environmental Impact Report proposes to PERPETUATE AN EGARIOUS PRESENT ZONING VIOLATION AT THE MOUTH OF SHIRLEY CANYON BY RE-ZONING TO MEET THE DEVELOPER'S HEAVY COMMERCIAL NEEDS. Shirley Canyon is a critical part of the Squaw Valley environment, and the re-zoning WOULD BE SIGNIFICANT, UNAVOIDABLE, AND DEFINITELY NONMITIGATIBLE.

Shirley Canyon is one of Squaw Valley's most important natural areas, and one that hosts much of the hiking in and around the valley. The past and present ski corporations have seriously violated the existing zoning regulations at the mouth of the canyon, they continue to do so, and they propose to continue to do so by re-zoning the violated area in order to continue their illegal usage and violation. They propose this in spite of the recognized environmental importance of Shirley Canyon. They appear to have two main reasons: 1. Their re-zoning would relieve them of having to vacate the illegally occupied area, and, 2. They wish to vacate the approved "HC" (*Heavy Commercial*) area near Red Dog in order to use that land for their "VC-C" (Village-commercial-core) development. (See *p. 4-8 and 4-10* for definitions.) Their proposal clearly sacrifices an environmentally sensitive and public use area for profit for their distant and unconcerned investors.

Specifically, the area in question is currently zoned "VC" (Village Commercial) (*Exhibit 4-1*) and "FR" (Forest Recreation) (*Exhibit 4-1*). Although they do not (conveniently for them) provide an exhibit, their actual use now covers all of the FR area and part of VC. That actual use includes a permanent large workshop building, heavy equipment storage, and maintenance and construction supply material storage. In addition they have paved the ground surface all the way to the very edge of the Shirley Creek stream bank.

The developer proposes (*Exhibit 4-3*) to continue those uses and expand them farther south by re-zoning the area as "HC" (Heavy Commercial). They also intend (according to public presentations by the developer) to transfer some of the heavy commercial operations that are now near Red Dog to the re-zoned Shirley Canyon site.

In summary: How bad can things be? Already there's an illegal occupation of "FR" (Forest Recreation) and "VC" (Village Commercial = Housing). The developer proposes to continue the illegal uses and to cover his culpability by re-zoning the area to fit his desires. And, in the process, totally ignoring the environmental values as well as the existing zoning.

I35-1

1

THESE WOULD BE SIGNIFICANT, UNAVOIDABLE, AND NONMITIGATIBLE IMPACTS. The developer must both re-design the proposed development in the Shirley Canyon area to honor the existing "FR" (Forest Recreation) and "VC" (Village Commercial) zoning classifications and thus eliminate any and all "HC" (Heavy Commercial) operations and designations from his plan for that area. I35-1 cont.

(This comment is from David A. Brew Ph.D., U.S. Geological Survey Senior Research Geologist, Ret.; State of California Licensed Professional Geologist No. 2716. I have been a Squaw Valley homeowner since 1964 (with one interruption) and currently live at 1540 Lanny Lane in the valley. As a USGS Geologist I have had a great variety of field geologic and also administrative experiences. For over 15 years I have regularly attended Squaw Valley Public Service District, Squaw Valley Mutual Water Company, Squaw Valley Municipal Advisory Council, and Squaw Valley Design Review Committee meetings. I currently represent the Squaw Valley Mutual Water Company of the Technical Review Committee that monitors the quality of water in the aquifer below the golf course at The Resort at Squaw Creek.)

2

I35

David Brew, PhD
July 12, 2015

I35-1 See the Master Response regarding the mountain maintenance facility for a discussion of existing and proposed land use. Regarding the claim that existing uses on the parcel are illegal, CEQA does not require that an EIR evaluate the effects of an existing use, or that the project mitigate for existing conditions. The proposed project would rezone the parcel to V-Heavy Commercial, which would allow for mountain maintenance facilities. Nonetheless, it should be noted that the Forest Recreation zone allows ski lifts and ski trails (page 98 of the SVGPLUO) and "uses and structures which are customarily accessory and clearly incidental to the permitted principal uses and structures shall be permitted in this district" (SVGPLUO Section 250.12, page 99)." 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. No further response is provided here.

I36

Maywan Krach

From:	David Brew <dabrew30@gmail.com>
Sent:	Tuesday, July 14, 2015 2:06 PM
To:	Placer County Environmental Coordination Services
Cc:	David Brew
Subject:	Comment on Draft Environmental Impact Report, Village at squaw Valley Specific Plan, State Clearinghouse # 2012102023
Attachments:	15.07.14 dab's dEIR comments on climate

Maywan Krach;

The subject comment (on GHG Emissions and Climate Change) is attached. It is also pasted in below.

David A. Brew Ph.D.

2015.07.14.1600

¶ SECTION 16.3, GHG EMISSIONS AND CLIMATE CHANGE; IMPACTS; SECTION 16.3.1 Significance Criteria, et seq.: This Draft Environmental Impact Report does not fully recognize the global importance of small GHG emissions, even though they meet arbitrary governmental standards; does not deal with the ground-level effects of all construction- and built-out emissions on individuals; does not adequately evaluate THE POTENTIAL EFFECTS OF CLIMATE CHANGE IN THE SIERRA NEVADA ON THE PROPOSED DEVELOPMENT as part of the Feasibility Analysis, nor does it analyze emission and climate-change alternatives that would be associated with the Reduced Density Alternative. SUCH EFFECTS COULD BE SIGNIFICANT, UNAVOIDABLE, AND NONMITIGATIBLE. I36-1

To begin with, I judge that every GHG emission, and every contributing factor in climate warming, is significant; even my almost-zero-emission car. So all of the well-based assumptions and calculations in this report that give results that are interpreted to be "less than significant", I discount. Little bits add up to big pieces, and so it is with global warming. I36-2

What's more, it is significant to me that after all of the calculations and protestations, that on p. 16-19 (*Significance after mitigation*) the conclusion is that the GHG emissions would be "*potentially significant and unavoidable*". No other "*unavoidable*" precedes that conclusion, so I wonder if the authors suddenly realized the reality of what they had written. I36-3

Back to the effects on individuals at ground level during construction in particular, with dust, vehicle emissions and construction equipment emissions combining to produce a noxious air quality. This is not even mentioned in the main section on emissions, but it does emerge at *pages 18-31 and 18-32 under Section18.1, Cumulative Impacts, Mitigation Measures, Impact 18-28*, where cumulative exposure to mobile sources are described. This is an **omission**. I36-4

Further, items 16.1.2 and 16-3 *Effects of Climate Change on the Environment*, pages 16-2 and 16-20, makes it clear that the now-generally-accepted climate modeling indicates that the Sierra Nevada and I36-5

1

the Squaw Valley area will experience seriously significant changes in temperature and precipitation patterns in the future. Simple reasoning suggests that this will have a tremendous and devastating effect on the winter sports operations and tourist visits. But, because this is a "climate on environment and development" rather than a "development on climate" factor, it is both difficult to treat and not treated adequately. The *"less-than-significant" conclusion* on page 16-21 really just dodges the issue. I36-5 cont.

The only attention to this important factor is in Section 17.0 (*ALTERNATIVES, page 17-1*) where "economic viability" is cited as a factor in determining the feasibility of a project. There the ball is passed to the Placer County Board of Supervisors, which may or may not have other-than-applicant information on long-term economic viability (Appendix K, a "Competitive Marketing Analysis" is unfortunately not included in the Draft EIR, nor is a link to it). Whatever analyses the developer provides to the Board, there will still remain serious questions to all but the developer as to whether a large expanded Squaw Valley village is appropriate for a future of diminished winter sports activity and tourist visitation. I36-6

Finally, the most important alternative ((17.3.4, *Reduced Density Alternative*, p. 17-24-17 to 17-27) has not been subjected to the same degree of analysis the plan proposed by he developer. This, to me, is a startling **omission**, because it is the alternative that has been most widely discussed by the environmentally protective group in and around Squaw Valley. I36-7

THESE ARE SIGNIFICANT, UNAVOIDABLE, AND NONMITIGATIBLE IMPACTS. The developer must acknowledge that the GHG emissions, whether they meet arbitrary State standards or not, will contribute in an important way to global warming. Likewise the developer must admit that the effects of construction and build-out will seriously affect the now-pristine air quality enjoyed by the resident of and visitors to Squaw Valley. The developer needs to prepare alternative scenarios reflecting the likely changes in climate on the economic aspects of the feasibility of its proposed project. The developer must prepare a more complete analysis of all aspects of the environmental impact of the Reduced Density Alternative. I36-8

(This comment is from David A. Brew Ph.D., U.S. Geological Survey Senior Research Geologist, Ret.; State of California Licensed Professional Geologist No. 2716. I have been a Squaw Valley homeowner since 1964 (with one interruption) and currently live at 1540 Lanny Lane in the valley. As a USGS Geologist I have had a great variety of field geologic and also administrative experiences. For over 15 years I have regularly attended Squaw Valley Public Service District, Squaw Valley Mutual Water Company, Squaw Valley Municipal Advisory Council, and Squaw Valley Design Review Committee meetings. I currently represent the Squaw Valley Mutual Water Company of the Technical Review Committee that monitors the quality of water in the aquifer below the golf course at The Resort at Squaw Creek.)

2

I36 David Brew, PhD July 14, 2015

I36-1 The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

I36-2 The comment suggests all GHG emissions are significant (even the commenter's own "almost-zero-emission car"). While this is an understandable sentiment given overall concerns associated with GHG emissions and their contribution to climate change, it is an unrealistic measure of significance. GHG emissions are associated with everything from animal exhalation to automobiles to industrial operations. Even the California Supreme Court, in a case addressing CEQA and GHG emissions, recognizes that projects emit GHGs and that this is a cumulative issue; see the Master Response regarding the GHG analysis.

I36-3 Please refer to the paragraph on page 16-19 of the DEIR under the heading, "Significance after Mitigation," for discussion about why the impact was determined to be potentially significant and unavoidable.

I36-4 The comment asserts that the DEIR fails to analyze air quality effects on individuals at ground level during construction. These topics are discussed in Chapter 10, "Air Quality," in the DEIR. Construction-generated emissions of criteria air pollutants, including particulate matter with an aerodynamic diameter of 10 micrometers or less (PM_{10}) and fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less ($PM_{2.5}$), contained in both dust and equipment exhaust, is analyzed under Impact 10-1. Operational emissions of criteria air pollutants and precursors are analyzed under Impact 10-2. The potential for project-generated vehicle trips to result in localized concentrations of carbon monoxide to reach unhealthy levels is analyzed under Impact 10-3. The potential for the project to expose nearby receptors to elevated health risk from toxic air contaminants is analyzed under Impact 10-4. The potential for the project to expose nearby receptors to objectionable odors is analyzed under Impact 10-5.

I36-5 It is unclear if the comment is editorial in nature or a critique of the DEIR conclusions with respect to climate change. Please refer to the responses to comments I41-2 and O9-161.

I36-6 "Economic viability," as referenced in Chapter 17, "Alternatives," of the DEIR is one of the factors provided by the State CEQA Guidelines that is used to determine the feasibility of an alternative. See the Master Response regarding the Reduced Density Alternative for more information about the County's project approval process.

I36-7 See the Master Response regarding the Reduced Density Alternative for more information about the adequacy of the DEIR alternatives analysis.

I36-8 The comment provides a summary of detailed comments provided above. See responses to comments I36-1 through I36-7, above.

I37

Maywan Krach

From:	David Brew <dabrew30@gmail.com>
Sent:	Wednesday, July 15, 2015 8:35 AM
To:	Placer County Environmental Coordination Services
Cc:	David Brew
Subject:	Comment on Draft Environmental Impact Report, Village at Squaw Valley Specific Plan, State Clearinghouse # 2012102023
Attachments:	15.07.15 dab's dEIR comments on Sq Creek

Maywan Krach:

The subject comment (on Squaw Creek "restoration") is attached and is also pasted in below.

David A. Brew Ph.D.

2015.07.15.1035

SECTION 3.4.5, PROJECT DESCRIPTION, DESCRIPTION OF THE PROPOSED PROJECT, SQUAW CREEK RESTORATION, p. 3-33: This Draft Environmental Impact Report presents a misleading and probably ineffective, or perhaps even environmentally destructive plan for modification of the course and flow of Squaw Creek in what is called the "trapezoidal channel". It is NOT "restoration' at all, but is a lame effort to improve the trapezoidal channel and incorporate it into a environmentally insensitive real estate development plan. THE PROPOSED PLAN COULD CAUSE MORE SQUAW CREEK ABUSE, RATHER THAN "RESTORATION". If implemented, the plan would result IN UNAVOIDABLE IMPACTS, BUT IT COULD BE MITIGATED BY NOT IMPLEMENTING IT, AND INSTEAD DOING A REAL RESTORATION TO NEAR ITS PRE-RESORT CONFIGURATION.

Squaw Creek is the artery that supports the scenic and aesthetic, as well as some of the hydrologic values of the Squaw Valley environment. It has been abused by human intervention in almost all of its reaches, but the trapezoidal channel is the worst. The developer proposes to "restore" the channel and the creek, but their plan is a farce compared with what could and should be done. A real restoration is possible, and doing so would not only repair the damage, but would also have the creek provide almost-pre-resort hydrologic and biologic conditions, and provide a truly scenic corridor. Doing this would clearly make any real estate development more appealing and environmentally friendly. I37-1

The proposed Squaw Creek modification plan (incorrectly called a "restoration") consists of three parts: 1. Constructing a small artificial floodplain at the confluence of the South and North Forks of Squaw Creek; 2. Constructing stream quasi-meanders within the narrow confines of the downstream trapezoidal channel; and 3. Constructing a small artificial floodplain downstream below the easternmost vehicle bridge near the confluence of the main creek with a small side tributary from the south.

The proposed upstream confluence artificial floodplain area would be located at or near creek level. The creek is now incised below what would be a natural floodplain. Excavation of thousands of cubic

1

yards of sand and gravel would be required to build the floodplain, and the area is predicted to require dredging every few years (by unspecified parties, and paid for by unspecified parties). The construction and maintenance would be unavoidable impacts. Further, the artificial floodplain might not work at all. I37-1 cont.

The proposed downstream artificial floodplain would also require excavation of thousands of cubic yards of sand and gravel because the stream is deeply incised there also. This would be an **unavoidable impact**. I37-2

The proposed meanders between these two localities would be confined within a less-than-150-foot straight channel. As proposed, the meanders (Exhibit 3-19) would in no way resemble natural meanders and would probably be ineffective in containing the high-volume stream flows that occur in the creek (e.g., the 1997 extreme storm event). I judge this to be an **unavoidable impact**. Figure 4 (Historical channel planform, Squaw Creek) of the Balance Hydrologics, Inc. June 2014 report titled "Design Basis Report: Squaw Creek Restoration..." shows the 1939 configuration of Squaw Creek in the area of what is now the trapezoidal channel. The natural meanders in that photo are what the creek should be restored to, and not the slightly sinuous plan proposed by the developer. I37-3

The developer should be compelled to implement a real restoration of the trapezoidal channel reach of Squaw Creek, instead of the presently proposed band-aid. The proposed plan may likely exacerbate the effects of the high volume stream flows that occur infrequently. This would be a SIGNIFICANT, UNAVOIDABLE, AND NONMITIGATABLE IMPACT. But doing it righ tinstead would be good for the creek, for the whole valley, and even for the real estate development itself. I37-4

(This comment is from David A. Brew Ph.D., U.S. Geological Survey Senior Research Geologist, Ret.; State of California Licensed Professional Geologist No. 2716. I have been a Squaw Valley homeowner since 1964 (with one interruption) and currently live at 1540 Lanny Lane in the valley. As a USGS Geologist I have had a great variety of field geologic and also administrative experiences. For over 15 years I have regularly attended Squaw Valley Public Service District, Squaw Valley Mutual Water Company, Squaw Valley Municipal Advisory Council, and Squaw Valley Design Review Committee meetings. I currently represent the Squaw Valley Mutual Water Company of the Technical Review Committee that monitors the quality of water in the aquifer below the golf course at The Resort at Squaw Creek.)

2

I37

David Brew, PhD
July 15, 2015

I37-1 There is no specification in the SVGPLUO to restore the creek to a particular time period, including pre-1960. The comment provides an opinion regarding the design of the proposed project. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project.

As detailed in the DEIR, the effects of reconfiguring Squaw Creek and the Olympic Channel on hydrology and water quality would be reduced to a less-than-significant level with implementation of Mitigation Measure 13-6, which would decrease the uncertainty regarding the potential effectiveness of the stream restoration actions and provide a funded means to perform necessary maintenance or adaptive response (see Impact 13-6 on pages 13-75 to 13-76 of the DEIR). Contrary to the comment made, hydraulic and sediment transport analyses of the proposed restoration design indicate that the confluence area will be self-sustaining; routine dredging is not anticipated to be required in this area.

I37-2 See response to comment I37-1.

I37-3 The comment provides an opinion regarding the design of the proposed project. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project. It should also be noted that the proposed channel planform and geometry parameters (channel width, meander wavelength, meander amplitude, and radius of curvature) match those visible on the 1939 aerial photograph. See the discussion of Impact 13-8 (Exposure of people to flood hazards) in Chapter 13, "Hydrology and Water Quality," of the DEIR for an analysis of effects of the proposed restoration. As proposed, the restoration is designed to include grade control structures and depressional features for water retention, groundwater recharge, and collection and management of sediment. Channel capacity and floodplain storage would be maintained.

I37-4 The comment provides an opinion regarding the design of the proposed project. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project. As indicated above, the effects of the proposed restoration are analyzed in the discussion of Impact 13-6 (Reconfiguration of Squaw Creek and the Olympic Channel) and Impact 13-8 (Exposure of people to flood hazards) in Chapter 13, "Hydrology and Water Quality," in the DEIR. These impacts are determined to be less than significant with mitigation.

I38

Maywan Krach:

The subject comment (on seismicity and earthquakes) is attached and also pasted in below.

David A. Brew Ph.D

2015.07.15.1730

SECTIONS 12, 12.1.5, Mitigation Measure 12-1 (FAULTS AND SEISMICITY): This Draft Environmental Impact Report does not adequately analyze THE POTENTIAL DEVASTATING EFFECTS OF EARTHQUAKES on the fault system that crosses Squaw Valley. SUCH EFFECTS WOULD BE UNAVOIDABLE AND NONMITIGATIBLE.

Note that the factual statements that follow, unless otherwise attributed, can be corroborated by going to the U.S. Geological Survey's official earthquake and seismicity website <earthquake.usgs.gov>. I38-1

This Draft Environmental Report makes a fairly decent effort at discussing the probability of earthquakes in the Squaw Valley area, but it falls short in not including all of the available information on the regional tectonic and seismic factors that strongly influence what could happen locally in Squaw Valley.

One important factor that has been **omitted** is the current seismicity on the Polaris fault zone, which is only a few kilometers to the east of the Sierra-Tahoe fault zone (which includes the faults crossing Squaw Valley, as well as others). Both zones are part of the regional fault system that bounds the Sierra Nevada. The Polaris zone is currently active, with earthquakes of M3.0 to M4.0 occurring every few months. On April 14, 2015, there was a M3.4 about 10 km north of Stateline, CA. On September 12, 1966, there was a M5.4 earthquake close to Truckee, CA, only about 20 km northeast of Squaw Valley. Although the zone's earthquakes are currently small, there are reports of an estimated M6.0 in the 1860's, not far to the north. Current calculations do not suggest a large EQ soon, but the potential is there, and is not recognized in the Draft EIR. (Note that the authors, on Table 12-1, chose to use different names for some of the faults in the Polaris zone.) I38-2

The nexus of faults that crosses Squaw Valley (Exhibit 12-4) is part of the regionally significant Sierra-Tahoe fault zone (as it is often called). As noted above, it and the similar Polaris fault zone several kilometers to the east define the eastern steep front of the Sierra Nevada at this latitude. One report (Schweickert, R.A., Lahren, M.M., Karlin, R.E., Smith, K.D., and Howle, J.F., 2000, Preliminary map of Pleistocene to Holocene faults in the Lake Tahoe Basin, California and Nevada: Nevada Bureau of Mines and Geology Open-File report 2000-4, scale 1:100,000) indicates that one of the local Squaw Valley faults has moved within the past 10,000 years. This citation is **not mentioned** in the Draft EIR, but it is significant. Overall, the regional references used are not original mapping, or even revised original mapping; they have all been copied from "Harwood, D.S., 1981, Geology of the Granite Chief Wilderness Study Area, Calif.: U.S. Geological Survey Miscellaneous Field Studies Map MF 1273-A; 1 sheet, scale 1:62,500". The fault locations on that map are yet to be revised in any peer-reviewed publication, although Harwood (oral commun. 2014) suggests that more detailed studies certainly could improve the data. I38-3

Although the Sierra-Tahoe fault zone containing the Squaw Valley faults is currently not active, a recent review of the data and literature (Brothers and others, 2009, New constraints on deformation, slip rate, and timing of the most recent earthquake on the West-Tahoe-Dollar Point Fault, Lake Tahoe, California, Bulletin of the Seismological Society of America, v. 99, n. 2A. p. 499-519) suggests on page 518 that this fault system "...has the potential to generate M ≥ 7.0 ruptures." this is a significant conclusion in a recent peer-reviewed article, and it has been **omitted** from the Draft EIR.

I38-3 cont.

Altogether, this information indicates that the authors of this section of the Draft EIR have underplayed the potential for a serious magnitude earthquake and accompanying ruptures on the faults that cross Squaw Valley, either locally or within 10's of kilometers.

The impact analysis section (**12.3.4**) tries hard to minimize the significance of the faults, but admits that they are poorly understood. The USGS shaking maps show this to be an area of potentially great shaking, should an earthquake occur. This alone is a warning. The idea that 200' setbacks (**Mitigation Measure 12-1**) from the faults serves to protect buildings from serious damage is almost laughable, as anyone who has lived through the shaking and localized-fault-proximity-related damage of the 1979 Loma Prieta earthquake will tell you. Additional studies are a good idea, but they will not afford protection. The only way to avoid this risk is to not construct anything anywhere near the fault traces.

I38-4

This section of the Draft EIR seriously underestimates the potential for damage from an earthquake on the Sierra-Tahoe fault system, and also from the distant effects of a quake on the Polaris fault system. **The probability is small, but the risk is great; IT IS SIGNIFICANT, UNAVOIDABLE, AND NONMITIGATABLE. THE DEVELOPER SHOULD SIMPLY FOLD HIS TENT AND LEAVE! BARRING THAT, I LOOK FORWARD TO SEEING HOW THE DEVELOPER PROPOSES TO POSITION ALL OF THOSE BUILDINGS 200' AWAY FROM THAT NEXUS OF FAULTS THAT FILLS THE WEST END OF SQUAW VALLEY'S FLOOR--**

(This comment is from David A. Brew Ph.D., U.S. Geological Survey Senior Research Geologist, Ret.; State of California Licensed Professional Geologist No. 2716. I have been a Squaw Valley homeowner since 1964 (with one interruption) and currently live at 1540 Lanny Lane in the valley. As a USGS Geologist I have had a great variety of field geologic and also administrative experiences. For over 15 years I have regularly attended Squaw Valley Public Service District, Squaw Valley Mutual Water Company, Squaw Valley Municipal Advisory Council, and Squaw Valley Design Review Committee meetings. I currently represent the Squaw Valley Mutual Water Company of the Technical Review Committee that monitors the quality of water in the aquifer below the golf course at The Resort at Squaw Creek.)

I38 David Brew, PhD
July 15, 2015

I38-1 The potential for the project to result in exposure of structures and persons to the effects of ground rupture and shaking (Impact 12-1) are evaluated on pages 12-20 through 12-22 of the DEIR. This impact is considered to be significant prior to mitigation. As provided on page 12-21:

> The Olympic Valley is in a seismically active region and could be subject to low or moderate ground acceleration in the event of an earthquake in the vicinity. While there are no Alquist-Priolo zones on the project site, prior geologic maps and studies have identified fault traces that cross Olympic Valley, including potentially active fault traces through the main Village area.

While Mitigation Measure 12-1 would not eliminate the hazard associated with construction in an area that has potentially-active faults, it would reduce the potential effects to an acceptable level by resulting in building locations that are potentially safer and better able to withstand seismic risks posed by potential fault rupture. In addition, Mitigation Measure 12-2 would ensure that building site preparation and building foundations would be designed in a manner to reduce the risks of seismic shaking to project buildings to an acceptable level.

I38-2 The comment provides a summary of detailed comments provided below, which contend that Chapter 12, "Soils, Geology, and Seismicity," of the DEIR underestimates the potential for damage due to an earthquake on the Sierra-Tahoe or Polaris fault systems because (1) the current seismicity of the Polaris fault zone is not discussed, (2) there is recent evidence that the inactive Tahoe-Sierra fault system could generate a large earthquake, and (3) Mitigation Measure 12-1 may not protect buildings from serious damage in the event of an earthquake. See responses to comments I38-2 through I38-4, below, for detailed responses.

The Polaris fault zone is a 200-foot zone centered on the recently-identified Polaris Fault. As acknowledged in the comment, the Polaris Fault is identified as active in Table 12-1 (Active and Potentially Active Faults near Olympic Valley, California). In addition, the "West-Tahoe-Dollar Point Fault" referenced by the commenter is listed on Table 12-1 of the DEIR as the West Tahoe – Dollar Point Fault Zone. Furthermore, the fault is listed as "Active" and the potential magnitude of an earthquake occurring along this fault is listed as "Large."

I38-3 The comment provides citations for two reference documents that are not specifically used in the DEIR, which indicate that one of the faults in the Valley may have moved in the last 10,000 years. This data supports the first line of Table 12-1 (Active and Potentially Active Faults near Olympic Valley, California), which indicates that unnamed fault traces that may be associated with the Tahoe Sierra Fault Zone are located onsite. No revisions to the DEIR have been made in response to this comment.

I38-4 The impact evaluation in the DEIR concludes that "the spatial uncertainty regarding the on-site fault traces could result in structures inadvertently being constructed over or near a previously unknown active fault" (see page 12-21 in Chapter 12, "Soils, Geology, and Seismicity," of the DEIR). Mitigation Measure 12-1 is provided to address this uncertainty. The measure does not, as suggested in the comment, establish a blanket setback from faults. Rather, prior to the recordation of each Small Lot Tentative Map for any parcel that proposes a habitable building or structure within 200 feet of the mapped trace of Fault 2 or Fault 5 (as identified in the DEIR), the project applicant shall prepare and submit a Final Fault Evaluation Report produced by a California Registered Civil Engineer, Registered

Geologist, Certified Engineering Geologist, or Geotechnical Engineer that includes: written text addressing existing conditions; evidence suggesting geologically recent fault activity; all appropriate calculations, logs, cross sections, testing, and test results, fault trace location map(s) overlaid with proposed on- and off-site improvements; and site maps showing applicable building setbacks, or possible setbacks, based on various scenarios resulting from the final investigation. Therefore, building setbacks would be established as structures are proposed based on additional evaluations and would be approved by Placer County's Engineering and Surveying Division.

I39

Maywan Krach

From: David Brew <dabrew30@gmail.com>
Sent: Thursday, July 16, 2015 6:34 AM
To: Maywan Krach
Cc: David Brew
Subject: Comment on Draft Environmental Impact Report, Village at Squaw Valley Specific Plan, State Clearinghouse # 2012102023
Attachments: 15.07.15 dab's dEIR comments on cumulative

Maywan Krach:

The subject comment (on cumulative effects) is attached and is also pasted in below.

David A. Brew Ph.D.
2015.07.16.0835

SECTION 18-1, CUMULATIVE IMPACTS, P. 18-1: This Draft Environmental Impact Report does not in any way evaluate THE CUMULATIVE EFFECTS OF ALL OF THE DIFFERENT ENVIRONMENTAL IMPACTS TOGETHER. It even appears that the authors misunderstand what "cumulative" means in an environmental impact analysis and report. They apparently consider each impacting element as a separate entity. That is not the usual understanding of the word; it really means that every impact works together with every other impact and they not only sum up to a whole, but also the whole is usually greater than the sum of its environmental parts. CUMULATIVE EFFECTS WOULD BE SIGNIFICANT, UNAVOIDABLE, AND IN TOTAL, NONMITIGATABLE EFFECTS WOULD BE UNAVOIDABLE AND NONMITIGATIBLE. I39-1

Behind much of the developers (KSL CAPITAL PARTNERS/SQUAW VALLEY SKI HOLDINGS/SQUAW VALLEY REAL ESTATE) proposed plan is the belief that Squaw Valley could be a world-class destination resort such as Sun Valley, Vail, Beaver Creek, Park City, Whistler, or Aspen in North America, or such as Val d'Sere, Chamonix, St. Moritz, Zurs-Lech, St. Anton, or Kitzbuehl in Europe. I have skied all of these resorts and there is no way that Squaw Valley can ever reach their status. The reason is that Squaw Valley is too steep, and the snow (usually) too deep for the vast majority of skiers. Squaw does not have enough beginner and intermediate skier terrain to attract a world-wide clientele as do the resorts listed above. It is clearly a niche resort, and can never measure up to those others. So, in my opinion, the whole proposed development is founded on a shaky premise, and KSL Capital Partners/Squaw Valley Ski Holdings/Squaw Valley Real Estate should be ready to write off a big part of their $127,000,000 (to date) investment. I39-2

The cumulative environmental impacts described in all of the comments submitted, including those that I myself have submitted, all together would constitute an enormous and devastating environmental impact on sub-alpine Squaw Valley. The valley is known far and wide for its remarkable visual combination of nearby high peaks and the open valley. The valley is unique in the Sierra for having maintained within its narrow box canyon a semblance of how the landscape appeared at the end of the glaciations that shaped the mountain range. The existing Squaw Valley Resort is the only Sierra resort that is situated at the head of a box canyon nestled up against high peaks. The impact of the proposed mega-resort development would forever alter this unique aesthetic and natural setting. I39-3

1

Said another way, the proposed development, with the bulk of its over-size structures, increased tourist population, and years-long disruption during construction, would forever change the valley far, far beyond its already disturbed state.

I39-3 cont.

Is this development needed to provide profits to the developer and its investors in KSL Fund II, none of whom know anything (or much) about the Squaw Valley that is so important to us who live there? The environmental degradations and costs would be borne by us, while the developer and its investors would not care a bit. This is a California and Placer County environment that would be forever degraded, and not Colorado or wherever those investors are located.

Whatever the potential financial benefits to Placer County might be, IT IS JUST NOT WORTH IT!

It's really not necessary to list, in a table or otherwise, all of the negative impacts that the proposed project would have on Squaw Valley and its neighbors. If you have read all of the comments carefully, you already know.

Thank you for your attention! And do the right thing!

I39-4

(This comment is from David A. Brew Ph.D., U.S. Geological Survey Senior Research Geologist, Ret.; State of California Licensed Professional Geologist No. 2716. I have been a Squaw Valley homeowner since 1964 (with one interruption) and currently live at 1540 Lanny Lane in the valley. As a USGS Geologist I have had a great variety of field geologic and also administrative experiences. For over 15 years I have regularly attended Squaw Valley Public Service District, Squaw Valley Mutual Water Company, Squaw Valley Municipal Advisory Council, and Squaw Valley Design Review Committee meetings. I currently represent the Squaw Valley Mutual Water Company of the Technical Review Committee that monitors the quality of water in the aquifer below the golf course at The Resort at Squaw Creek.)

2

I39

David Brew, PhD
July 16, 2015

I39-1 The comment suggests that the cumulative analysis was incorrectly prepared because all of the impacts of the proposed project should be considered collectively as a cumulative impact of the project alone. As described further in the Master Response regarding the cumulative analysis, CEQA provides guidance on what is considered a cumulative impact, which has typically been considered in terms of evaluating the impacts of a project collectively with other related projects. Regarding the cumulative effects of individual impacts considered together, all significant effects can be viewed, together, in two locations of the DEIR, the Executive Summary (Chapter 2 of the DEIR), where all impacts are listed, and the discussion of significant and unavoidable impacts in the DEIR (Section 18.2 of the DEIR), where all the impacts that remain significant after mitigation are listed. Also, seethe Master Response regarding significant and unavoidable impacts.

I39-2 The comment states that Squaw Valley can never be a world-class destination resort because Squaw Valley is too steep, the snow is too deep, and there is not enough beginner and intermediate skier terrain. 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.

I39-3 See response to comment I39-1 regarding the cumulative analysis. See also the Master Responses regarding the visual impact analysis, occupancy assumptions, noise, and the 25-year construction period.

I39-4 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.

I40

Maywan Krach

From: David Brew <dabrew30@gmail.com>
Sent: Thursday, July 16, 2015 2:11 PM
To: Maywan Krach
Cc: David Brew
Subject: Comment on Draft Environmental Impact Report, Village at Squaw Valley Specific Plan, State Clearinghouse # 2012102023
Attachments: 15.07.16 dab's dEIR comments on water

Maywan Krach:

The subject comment (on water issues) is attached and also pasted in below.

David A. Brew Ph.D.
2015.07.16.1610

¶ SECTION 13.0, et seq., This Draft Environmental Impact Report contains a FATAL FLAW because all of the discussions regarding water rely on the WATER SUPPLY ASSESSMENT (WSA)(APPENDIX C) and that document contains FABRICATED DATA that are used to support the developer's contention that the Squaw Valley aquifer can supply adequate water to both the existing development and the proposed development. Careful readinng clearly indicates that THERE IS NOT ENOUGH KNOWN WATER SUPPLY IN THE SQUAW VALLEY AQUIIFER TO SUPPORT THE PLANNED DEVELOPMENT. (There may be enough water, but it has not yet been quantified and is not known well enough to predict its actual volume.) This report and its main support, the Water Supply Assessment, use fabricated data in an effort to disguise this reality. This alone should cause rejection of this report and requiring the developer to produce a scientifically and engineering-wise unbiased report that correctly states the relation between the available supply of water in the Squaw Valley aquifer and the existing water demand plus that projected for the development.

Much of the discussion of groundwater in this Draft EIR, and all of the data used here are repeated from the Water Supply Assessment (WSA). I40-1

The WSA referred to above and below is the one dated July 3, 2014, prepared for Placer County and Squaw Valley Public Service District (SVPSD) by Farr West Engineering, Hydrometrics WRI, and Todd Groundwater. My understanding is that this report was never approved by the Board of Directors of the SVPSD, nor by any agency or office of Placer County. I understand that the SVPSD did hire another consultant to review the report.

As shouted-out above, the WSA contains **fabricated data**, the sources of which are described below. Those fabricated data are used in the WSA's analyses and likely appear to the non-critical reader as being reasonable.

The purpose of the following sections is to convince you that the developer's using **spurious, pretend/imaginary well information is non-scientific and constitutes a "fatal flaw"** that should cause this Draft EIR to be rejected as both inadequate and purposely dishonest in trying to cover up the present groundwater supply situation.

1

Basically, available present information shows that there is not enough water to supply both the KSL Capital Partners/Squaw Valley Ski Holdings/Squaw Valley Real Estate proposed village expansion and the existing domestic and commercial demand in Squaw Valley.

The Executive Summary states the situation succinctly:

The existing water demand in the valley is 842 acre-feet per year (AFY)(p. ES-1). The total future demand from all sources at the full KSL Capital Partners/Squaw Valley Ski Holdings/Squaw Valley Real Estate in 2040 is estimated to be 1,205 AFY. This is an increase of 363 AFY, or about 43%.

The Executive Summary does not put a number on the existing water supply, except to assume that it will continue to be the historical level of 842 AFY, or its capability of serving this increased demand; instead it offers these words:

"The existing municipal water supply wells are capable of producing more water than is currently used in Olympic Valley, but not enough to meet the projected demands at 2040. Therefore, an expanded wellfield with new wells will be required to meet these projected demands. The projected new well sites were identified..." (Page ES-2).

These are sites for new wells, not existing wells. They are at this point sites of potential wells, and are not production wells. Their possible production capabilities are not known, but are only surmised; they are imaginary production wells.

I40-1 cont.

The Executive Summary goes on, treating these imaginary production wells as if they are real:

"All of the new wells were used in conjunction with the existing wells in assessing the sufficiency of supply."

So, presumed production from these imaginary wells has been combined with the existing production capability in order to close the 43% gap between the existing supply and the projected demand. Thus the solution to the shortfall has been to use production from imaginary wells, not real, known-production wells.

I40-2

Page 4-4, ¶ 3 provides the basis for estimating how many new wells would be required to meet existing demand, growth of non-project demand, and project demand:

"To estimate the number of wells required to meet this demand [1,205 AFY, an increase of 363 AFY] MacKay & Somps assumed that each well could produce a maximum of 200 gallons per minute (gpm) at a duty cycle of no more than 70 percent per day ... results in the need for at least two new wells for non-project water demands in addition to the four [this number not mentioned previously, except briefly on p. 4-3] required for the Project demands. These six new wells ..."

Page 6-1, ¶ 5 contains an interesting sentence justifying the use of more than four imaginary wells to cover future demand:

"Limiting the potential new well sites to only the six new SVPSD wells required to meet demand at 2040 would have shown the ability of a specific wellfield to meet demands, not the Basin as a whole." Figure 6-1 shows locations for nine (9) now-as-yet-imaginary wells.

Page 6-2, ¶ 2, states that these now-as-yet-imaginary wells [and the pumping capabilities assigned to them as described above] are included in the supply modeling efforts, per " These well locations were

I40-3

2

included in the Model to perform simulations of pumping to meet total water demands for 2040."

One factor not treated here is the possible effect of pumping the upstream imaginary wells on the existing downstream wells. Conceivably those existing production wells might receive a diminished flow, and thus yield less water than they now do. I40-3 cont.

In summary, this is a real boot-strap scenario: There is a supply-demand gap, you fill it by estimating the pumping capacity of some now-imaginary wells, and that tells you how many wells you need to close the gap, you then bump that number up to cover possible wellfield limitations, then you use all those fabricated data for nine imaginary wells, as if it were real, in the pumping simulations.

This is not science; this is straightforward willful deception intended to accomplish the developer's goals. The whole Water Supply Assessment should be rejected on this basis alone. And because the Draft EIR uses this fabricated information in its treatment of water pumping and the demand-supply calculations, it, too should be rejected. I40-4

Moving on a bit: Section 6.3 evaluates "Sufficient Water Supply" using a concept called "Saturated Thickness", which is a measure of the variation of the depth to water in wells over time. The figure of 35% below average is selected as the critical amount that the thickness should not drop below. It is not clear why 35% was selected (p. 6-5) when the measured maximum historical drop has been about 21%, and the overall average only about 15% (Figure 6-1.

It is hard to tell exactly how useful this measure is; one other problem is that the calculations, although stated to represent a function of aquifer thickness, actually do not. Although it is not stated, the calculations are based on well depth, and not depth to the base of the aquifer fill. None of these wells extend to the underlying bedrock, and there conceivably may be a significant thickness of water-bearing aquifer below the well bottoms. Depending on what material might be present, each well's figures might change, probably towards reducing the individual well's percentage drop. And anyway, all those nine imaginary wells are included in these calculations, too. I40-5

And now moving back to Section 13.1 et seq. in the Draft Environmental Report:

13.1.3, Groundwater, page 13-11, ¶ 4: The model results deviate from the actual data enough to make one wonder. Further, the model is based on well data from a small part of the aquifer, and the results for any actual wells in the westernmost part of the valley might differ, plus it is clear from public presentations that the model does not apply to any area in the eastern part of the valley. I40-6

Exhibit 13-8: The 1992 to 2011 groundwater elevation data can be interpreted to indicate an overall decrease in average elevation from about 6,188" in j-92 to 6,184' in j-12. To me this is a significant trend that is not discussed on page 13-13. I40-7

Exhibit 13-10 The Squaw Creek snowmelt duration from 2003 to 2010 is interesting, but nowhere did I find precise information on how the data were obtained. I judge that the stream gauge data were somehow used by identifying stream flow changes. I40-8

13.1.5, Groundwater Quality, page 13-25, ¶ 3: I frankly judge that bringing in the specter of undiscovered leaking underground pollution sources is a red herring tactic. Not only have all the former sites been remediated, there are years of water quality monitoring since that time, and not contaminants have been detected. Why do this? I40-9

3

Impact 13-4, Groundwater Pumping, page 13-35, ¶ 2; here we have the **pretend/imaginary** "six (6) new wells", the nine (9) "simulated" wells, and the "saturation index" being used as if they reflected real data. These are all discussed above regarding the Water Supply Assessment. I40-10

Thank you very much for your attention to this important, indeed critical, part of the Draft Environmental Impact Statement.

THE BOTTOM LINES ARE THAT, FIRST, THE WATER SUPPLY ASSESSMENT MUST BE REVISED TO TREAT THE DEMAND-SUPPLY GAP IN AN HONEST WAY, WHICH IS TO SAY THAT HOW THE GAP CAN BE FILLED IS NOT YET KNOWN; SECOND, UNTIL THAT IS DONE, ALL ENVIRONMENTALLY RELATED AND DEVELOPMENT RELATED DECISIONS ARE ON HOLD; AND THIRD, THE DEVELOPER MUST TURN THOSE IMAGUNARY WELLS INTO PRODUCTION WELLS, AND THE WHOLE YIELD FROM THE WESTERN END OF THE AQUIFER TESTED THOROUGHLY BEFORE ANY FURTHER ACTION IS TAKEN. I40-11

(This comment is from David A. Brew Ph.D., U.S. Geological Survey Senior Research Geologist, Ret.; State of California Licensed Professional Geologist No. 2716. I have been a Squaw Valley homeowner since 1964 (with one interruption) and currently live at 1540 Lanny Lane in the valley. As a USGS Geologist I have had a great variety of field geologic and also administrative experiences. For over 15 years I have regularly attended Squaw Valley Public Service District, Squaw Valley Mutual Water Company, Squaw Valley Municipal Advisory Council, and Squaw Valley Design Review Committee meetings. I currently represent the Squaw Valley Mutual Water Company of the Technical Review Committee that monitors the quality of water in the aquifer below the golf course at The Resort at Squaw Creek.)

4

I40 David Brew, PhD
July 16, 2015

I40-1 The comment is specific to the text of the WSA. See the Master Response regarding water supply for information on the adequacy of the WSA.

I40-2 See response to comment I40-1.

I40-3 See response to comment I40-1.

I40-4 See response to comment I40-1.

I40-5 See response to comment I40-1.

I40-6 See the Master Response regarding water supply for information on the groundwater modeling results and adequacy of the WSA.

I40-7 The comment expresses an opinion that Chapter 13, "Hydrology and Water Quality," in the DEIR should discuss the overall decrease in groundwater elevation shown in Exhibit 13-8. The text on page 13-13 in Chapter 13, "Hydrology and Water Quality," of the DEIR discusses these fluctuations. As stated on page 13-13, "Historical groundwater data for the SVPSD and SVMWC production wells in the western wellfield demonstrate that the wells experience large annual fluctuations (10 to 15 feet) between the winter/spring maxima and the summer/fall minima (Exhibit 13-8). The year-to year fluctuations are smaller than the seasonal changes, typically less than five feet (Exhibit 13-8) and closely reflect year-to-year precipitation patterns (Exhibit 13-4). Historical groundwater elevations do not display a distinct trend of increase or decrease over time. Groundwater elevations recover to within ten feet of the ground surface (~6,200 feet) in slightly more than half (11) of the 19 years of record (i.e., the 1992 to 2011, 19-year period of precipitation and groundwater data used for the groundwater model), and recover to within 15 feet in remaining years." The "trend" referenced by the commenter is analyzed in the DEIR and the assertion that it is not analyzed is incorrect.

I40-8 Exhibit 13-10 in the DEIR is derived from the *Preliminary Design Report for Lower Squaw Creek Restoration Project, Olympic Valley, California* that was prepared for the Placer County Planning Department by Sound Watershed Consulting in June of 2013. The data used in the analysis is derived from three flow monitoring stations (on the mainstem, north fork, and south fork) that were initially established by the Squaw Valley Public Utilities District in 2003 and subsequently maintained by Sound Watershed on behalf of the Friends of Squaw Creek starting in 2009.

I40-9 The potential for leaking underground storage tanks to impact water quality was included in the discussion to fully characterize existing conditions and notify the reader of the most recent water quality data results for remediation sites in the area.

I40-10 See the Master Response regarding water supply for information on the adequacy of the WSA.

I40-11 See the Master Response regarding water supply for information on the adequacy of the WSA. Project approvals are considered by the Placer County Planning Commission and Board of Supervisors separate from certification of the EIR. The comments with respect to the project approval process will be considered before a decision on the project is rendered.