

Christy Hill Intersection

The DEIR fails to identify that the intersection of Squaw Valley Road with Christy Hill Road and Far East Road is a safety hazard due to poor design. The intersection is very large and poorly defined, resulting in high-speed turning movements that are especially hazardous to pedestrians.

The project would add substantial traffic volumes through this intersection. Why does the DEIR fail to identify a pedestrian safety impact related to additional vehicle traffic through this hazardous intersection?

As a mitigation measure, the north leg should be realigned about 130 feet to the west as shown in Figure 5. With this realignment, the singular, large, poorly-defined intersection of Squaw Valley Road / Christy Hill Road / Far East Road would be split into two separate T intersections (Squaw Valley Road / Christy Hill Road and Squaw Valley Road / Far East Road), both with 90-degree angles. Between the two intersections should be installed a continental crosswalk across Squaw Valley Road (shown in yellow) along with a pedestrian pushbutton-actuated flashing beacon.



I226-15

**Figure 5: Realignment of Far East Road to improve pedestrian safety.
Existing and extended pathway is blue, new crosswalk is yellow**

3-lane Cone Operation

Section 9.1.6 of the DEIR describes the “three-lane coning program”. As noted above, the DEIR fails to acknowledge how this operation makes walking across Squaw Valley Road extremely hazardous. Also the DEIR fails to describe how this operation makes access into and especially out of driveways along Squaw Valley Road very hazardous as well. Please revise the DEIR to note these safety issues.

Mitigation Measure 9-2b, which also describes the cone program, states that the sponsor would station traffic control personnel only at the intersection of Squaw Valley Road with Wayne Road or Eric Road, but not both. Historically, Squaw Valley Resort provided traffic control at every intersection along Squaw Valley Road during peak ski days, which is necessary for the access and safety of side-street traffic as well as pedestrians crossing the road. The DEIR only analyzes the Wayne Road intersection, but every other intersection along the corridor would experience similar unacceptable delays and safety hazards. It would not be safe for traffic management personnel to be stationed at only Wayne or Eric and not at any other intersection. Instead, this mitigation needs to be expanded (to be consistent with historic practice) to provide personnel at the all of the intersections along Squaw Valley Road: Christy Hill, Eric, Wayne, Russell, Victor, Winding Creek, Indian Trail, Squaw Creek, and Creeks End.

I226-16

Noise Impacts

Squaw Valley Road between Christy Hill Road and Squaw Creek Road

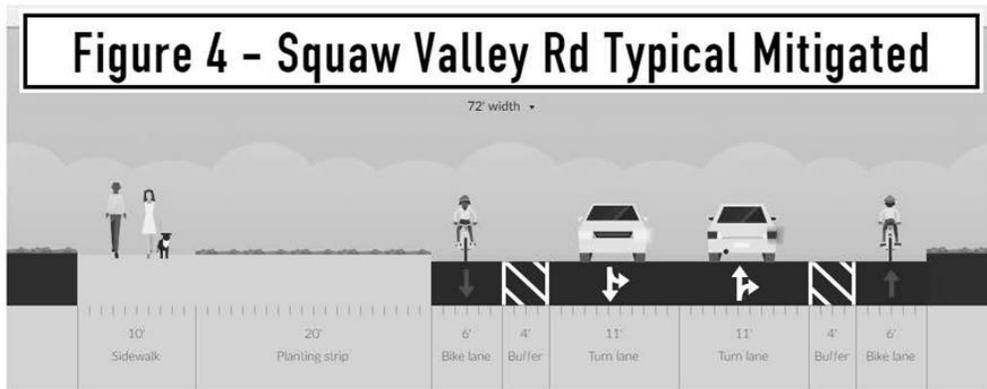
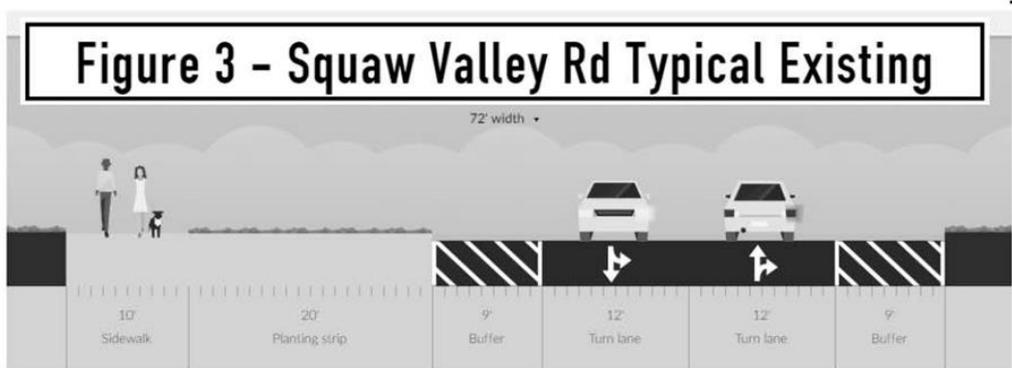
The VSVSP does not propose modifications to this segment of Squaw Valley Road. However, the DEIR does identify a significant/unavoidable traffic noise impact along this roadway.

This noise impact can in fact be mitigated to a less-than-significant level. The sponsor should be required to work with the County to finance an effort to create a *prima facie* speed limit of 25 miles per hour, reduced from the existing 35 mph speed limit. This speed limit is permitted in residential districts per California Vehicle Code Section 22352 (Squaw Valley Road meets the CVC definition of a residential district).

In addition to new speed limit signage, the sponsor should finance the restriping of the roadway with more narrow lanes and bicycle lanes as shown in Figure 4. Reduced lane widths would reinforce the reduced speed limit while providing buffered bike lanes for higher-speed cyclists, reserving the existing path for lower-speed cyclists and pedestrians. This restriping would not affect the three-lane traffic operation with cones.

Please revise the DEIR to note that significant noise impacts related to traffic would be mitigated by the lowering of the speed limit to 25 mph, and will associated restriping to enforce the reduce speed. Please also revise the DEIR to note that the adoption of a No Net New Vehicle Trips policy as described above would also serve to mitigate the traffic noise impact, because there would be no growth in traffic volumes.

I226-17



I226-17
cont.

Please revise the DEIR to include a new traffic noise mitigation measure that would restripe Squaw Valley Road between Christy Hill Road and Squaw Creek Road to a design as shown in Figure 4.

Local Transit

The discussion of existing transit conditions fails to document that eastbound TART buses traveling along Squaw Valley Road usually refuse to drop off or pick up passengers along the south shoulder, because there is not a designated pull-out zone. This situation makes local transit inaccessible for residents and visitors within the valley. Please revise the DEIR to document this situation.

Also the DEIR fails to note that all TART buses traveling between Tahoe City and Truckee (both northbound and southbound) divert into Squaw Valley and directly serve the Village and also the Resort at Squaw Creek. According to the TART schedule, this Squaw Valley detour adds 13 minutes of transit travel time to passengers traveling between Truckee and Tahoe City. When Squaw Valley Road becomes congested, this results in even more transit delay for many passengers that have no need to travel within Squaw Valley. Please revise the DEIR to note that transit delay within Squaw Valley affects not only local transit riders, but regional transit riders as well.

I226-18

Policy CP-2 states: "Enhance and supplement public transit systems and alternative means of mass transportation within the Village and Olympic Valley to reduce vehicle trips and emissions." And the transit significance criteria shown on page 9-32 of the DEIR states that a significant impact to transit would include "(2) Disrupt existing public transit services or facilities."

However as shown by data in the DEIR and compiled in the attached spreadsheet, the increase in traffic volume along Squaw Valley Road and CA-89 would result in excessive delays to transit. The attached spreadsheet is for Winter AM conditions and documents over two minutes of delay, while the same analysis for the Winter PM conditions identified over five minutes of delay. This transit delay analysis is not complete because the DEIR did not provide travel time or speed information for many travel segments; these segments are highlighted in yellow.

Please update the DEIR to include transit travel time analyses for all scenarios and including analysis for each travel segment.

I226-19

This amount of delay is unacceptable and would impact not only Squaw Valley transit riders but all riders between Truckee and Tahoe City. This added delay would also likely require TART to dispatch additional buses in order to maintain scheduled service levels, which would increase operational costs for TART.

Please revise the DEIR to identify a significant impact to transit operations due to congestion-related delays.

Mitigation Measure 9-7 calls for the funding of additional TART service by the sponsor to address over-crowding on buses. This mitigation measure should be expanded to not only fund over-crowding related service increases but also delay-related service increases in order to maintain scheduled service.

Even with Mitigation Measure 9-7 being expanded as described above to allow TART to maintain scheduled service, transit passengers would still suffer the additional delay. The impact would remain significant and unavoidable, unless the No Net New Vehicle Trip policy was implemented.

Traffic

CA-89 / Squaw Valley Road Intersection Analysis

In Appendix G, the SimTraffic cumulative analysis for the CA-89 / Squaw Valley Road intersection is incorrect on pages 149 and 163. As shown in the output, the volume served is only about 60% as opposed to about 100% which indicates that many vehicles in the simulation are “jammed up” and unable to proceed through the intersection, which leads to the underreporting of intersection delays.

I226-20

Please update the analysis at this intersection to correctly report the delays experienced.

Placer County Roadway LOS

Table 9-11 describes Placer County Roadway Levels of Service for three roadways segments (West River Street east of SR 89, Squaw Valley Road between SR 89 and Squaw Creek Road, and Squaw Valley Road between Squaw Creek Road and Village Area). The table references Appendix G for calculations. However traffic analysis output pages for these roadway segments are omitted from in Appendix G.

I226-21

Where are the traffic calculations that are referenced in Table 9-11?

CA-89 / CA-28 Intersection Analysis

Intersection Level of Service at Tahoe City Y improves between Existing and Cumulative conditions across the winter and summer analysis conditions, despite an increase in traffic volumes in the future. This is illogical. Please correct the analysis.

I226-22

Pedestrian Volumes at Intersections

As shown in Appendix G, the Synchro analysis at intersections 6, 7, 8 and 10, pedestrian volumes are input as 0 which is not correct. Under existing conditions there are pedestrians crossing these intersections to access parked cars. With the project and its new path there will be more pedestrians and cyclists which should be accounted for in the analysis.

I226-23

Squaw Creek Road / Squaw Valley Road Intersection

At Squaw Creek Road / Squaw Valley Road, in Appendix G, the northbound left turn movement is shown to operate at LOS F across many plus project and cumulative scenarios. This queue will block the heavier northbound-right movement, causing the entire northbound approach to experience higher delays than what is reported here. The analysis needs to account for the lane blockage.

I226-24

Regional Transit

Policy CP-4 states: “Encourage use of regional transit services (including services from commercial airports) and participate as appropriate in expansion of regional transit services through financial support, such as subsidies and/or funding programs.”

However, section 5.8 "Transportation Management: Enhanced Alternatives to the Private Automobile for Regional Access" only mentions the Reno airport shuttle, charter buses, and social media strategies. There is no mention of actual regional transit strategies.

I226-25

Regional transit is the most powerful tool to reduce vehicle miles traveled because it eliminates very long regional auto trips (which, as described below, is under-documented in the DEIR Air Quality and Greenhouse Gases section).

Consistent with the No Net New Vehicle Trips policy, regional transit should be encouraged. The sponsor should commit to regional transit incentives, and those commitments should be presented in the DEIR. Commitments should include financial support for regional transit service, such as subsidized fares on Amtrak, Capitol Corridor, Megabus, etc for skiers, guests, and employees. Support should also include promotion and in-kind contributions, such as free lift tickets and overnight accommodation for shuttle bus drivers. This regional transit support should extend to transit services that may not yet exist, for example a new regional shuttle line from the Bay Area and/or Sacramento directly to Squaw/Alpine and North Lake Tahoe.

I226-25
cont.

Please revise the DEIR to describe how regional transit incentives would be an effective way for the sponsor to reduce traffic volumes and adhere to the No Net New Vehicle Trips policy.

Parking

As noted above, the project includes too much parking, and the DEIR erroneously assumes that increased traffic is an inevitable consequence of additional development. In reality, a reduced parking supply is a traffic reduction measure. Rational parking management is one of the most powerful tools that would enable the sponsor to achieve the policy of No Net New Vehicle Trips on Squaw Valley Road.

The provision of parking is not free; it requires maintenance, snow plowing, traffic management, etc. Therefore, drivers should not receive free parking, otherwise parking is over-consumed. All users of parking, including day skiers, guests and employees, should be required to pay for parking at a daily rate. By sending a price signal to drivers, they become aware of the cost of parking and will consider other travel options.

Charging for parking can be controversial among day skiers. To avoid this controversy, the sponsor should reduce the lift ticket prices correspondingly. For example, if parking cost \$10 per day, then the daily lift ticket should be lowered from \$88 down to \$78. Similarly, the season pass cost should be lowered from \$809 down to \$609 (assuming 20 days of skiing per season). This pricing scheme would ensure that day skiers (who continue to drive alone) would bear no additional costs while perceiving the price signal of \$10/day parking; this signal would encourage some skiers to carpool or use transit. Ultimately this scheme would result in a reduction in parking demand which would substantially reduce parking structure construction costs.

I226-26

Beyond day skiers, charging for parking can also be controversial for retail customers, guests, etc. Validation schemes should be created for these parking users so that, similar to day skiers, these drivers would perceive the parking price signal without having to bear additional costs.

Employees should also have to pay for parking in order to encourage them to carpool and ride transit. Employees who live outside the valley may need a car for job access and should therefore pay a lower price than employees residing at the East Parcel.

Please revise the DEIR to describe how charging for parking and reducing parking supply would be an effective way for the sponsor to reduce traffic volumes and adhere with the No Net New Vehicle Trips policy.

Carpooling

There is no discussion in the DEIR about existing carpooling rates in the valley. Buried in the transportation Appendix G *Village at Squaw Valley Parking Analysis* it is revealed that village guests have an average vehicle occupancy of 1.76, while it is 2.20 for day skiers and 1.76 for employees.

Please revise the DEIR to note these existing carpooling rates within the valley, which is absent any programs to encourage carpooling among guests, skiers or employees.

Consistent with the No Net New Vehicle Trips policy, carpooling should be encouraged and the existing data demonstrates that there is ample room for improvement among day skiers, guests, and employees. The sponsor should fully develop the details of the carpooling incentives and they should be presented in the DEIR. Features should include:

- Preferential parking location for 4+ day skier carpools. Carpool parking should be in Lot 12 (closer to the mountain) and accessed from the bridge near Chamonix Place, while non-carpool parking should be in Lot 11 (further from the mountain) and accessed from the bridge at Far East Place.
- Overnight lockers. There should be free overnight ski lockers which would facilitate carpooling without having to haul ski equipment.
- Free parking. Carpool parking could be free (or reduced price) while non-carpool parking would be charged as described above.

Please revise the DEIR to include more details about the carpool incentive program and note that carpool incentives would be an effective measure for the sponsor to achieve No Net New Vehicle Trips.

I226-27

Air Quality and Greenhouse Gases

Page 70 of Appendix H describes vehicle miles traveled for both “Total” and for “Within Placer County and/or Mountain County Air Board”. Page 10-15 of the DEIR describes VMT emissions both within Placer County and overall.

It is not clear in the DEIR: Which source of data was utilized for mobile source emissions, total VMT or VMT only within Placer County and/or MCAB? Shouldn't the air quality and greenhouse gas impacts of all of the VMT be accounted for in the EIR?

Please revise the DEIR to note that significant air quality and greenhouse gas impacts related to traffic would be mitigated by the adoption of a No Net New Vehicle Trips policy as described above.

I226-28

I226-29

Visuals

Exhibit 8-1 and 8-2 show the locations of visual perspectives of the valley. All of the visuals are taken from at or near the ground floor of the valley. However, the perspective from being on the mountain, or on the Cable Car, and looking down onto the village is how most of the public will see the village. Why are there no vantage points from on the mountain or on the Cable Car looking down onto the village?

The parking garages proposed for the East Parcel and lots 11 and 12 would be visually dominating from both ground level and from atop the mountain. However the visual analysis beginning on page 8-47 barely mentions these parking garages at all. These parking garages by themselves should be considered visual impacts. Please revise the DEIR to include more discussion regarding the visual impacts of these parking garages.

On Exhibit 8-11 and 8-12, where are the proposed parking garages at Lot 11 and Lot 12?

I226-30

I226-31

Winter Saturday AM Transit Delay Analysis

Intersection/Segment Name	Intersection or Segment Number	Movement or Direction	Segment Length (miles)	Existing No Project		Existing Plus Project			Cumulative No Project		Cumulative Plus Project		
				Segment Speed (mph)	Travel Time (seconds)	Segment Speed (mph)	Existing Plus Project Travel Time (seconds)	Project Added Delay (seconds)	Segment Speed (mph)	Cumulative No Project	Segment Speed (mph)	Cumulative Plus Project Travel Time (seconds)	Cumulative Plus Project Added Delay (seconds)
Northbound from Tahoe City to Truckee via Squaw Valley													
CA 89 at Transit Center	Segment 5	Northbound	0.3	27.9	38.7								
CA 89/CA 28	Intersection 13	Northbound Left			20.8								
CA 89 from CA 28 to Alpine Meadows Rd	Segment 4	Northbound	3.7	36.4	365.9								
CA 89/Alpine Meadows Rd	Intersection 12	Northbound Through			0.0								
CA 89 from Alpine Meadows Rd to Squaw Valley Rd	Segment 3	Northbound	1.3	38.0	123.2								
CA 89/Squaw Valley Rd	Intersection 11	Northbound Left			16.2								
Squaw Valley Road from CA 89 to Squaw Creek Rd	Segment 8	Westbound	0.5		0.0								
Squaw Valley Rd/Squaw Creek Rd	Intersection 10	Westbound Through			0.0								
Squaw Valley Road from Squaw Creek Rd to Wayne Rd	Intersection 9	Westbound Through	0.9		0.0								
Squaw Valley Rd/Wayne Rd	Segment 9	Westbound	0.6		0.0								
Squaw Valley Road from Wayne Rd to Christy Hill Rd	Intersection 8	Westbound Through			0.0								
Squaw Valley Rd/Christy Hill Rd	Intersection 7	Westbound Through			0.0								
Squaw Valley Rd/Village East Rd	Intersection 6	Westbound Through			0.0								
Squaw Valley Rd/Chamonix Pl	Intersection 6	Southbound U Turn			10.1								
Squaw Valley Rd/Chamonix Pl	Intersection 7	Eastbound Right			0.0								
Travel through Squaw Valley parking lot			0.2		21.1								
Squaw Valley Rd/Christy Hill Rd	Segment 9	Eastbound	0.6		0.0								
Squaw Valley Road from Christy Hill Rd to Wayne Rd	Intersection 9	Eastbound Through			0.0								
Squaw Valley Rd/Wayne Rd	Segment 9	Eastbound	0.9		0.0								
Squaw Valley Road from Wayne Rd to Squaw Creek Rd	Intersection 10	Eastbound Right			9.5								
Squaw Valley Rd/Squaw Creek Rd	Intersection 10	Northbound Right			0.0								
Squaw Valley Road from Squaw Creek Road to CA 89	Segment 8	Eastbound	0.5		0.0								
CA 89/Squaw Valley Rd	Intersection 11	Eastbound Left			23.1								
CA 89 from Squaw Valley Rd to West River St	Segment 2	Northbound	7.8		7.3								
CA 89/West River St	Intersection 5	Northbound Through			8.7								
CA 89 from West River St to Deerfield Dr	Segment 1	Northbound	0.2		3.2								
CA 89/Deerfield Dr	Intersection 4	Northbound Through			6.8								
CA 89/Eastbound I 80 Ramps	Intersection 3	Northbound Through			8.7								
CA 89/Westbound I 80 Ramps	Intersection 2	Northbound Through			8.7								
Donner Pass Rd/Frites Ln	Intersection 1	Northbound Right			23.9								
Total Northbound Analyzed Travel Time					678.5			708.5	30.0		736.4	823.5	87.1
Southbound from Truckee to Tahoe City via Squaw Valley													
Donner Pass Rd/Frites Ln	Intersection 1	Westbound Left			30.4								
CA 89/Westbound I 80	Intersection 2	Southbound Through			4.7								
CA 89/Eastbound I 80	Intersection 3	Southbound Through			9.2								
CA 89/Deerfield Dr	Intersection 4	Southbound Through			8.4								
CA 89 from Deerfield Rd to West River St	Segment 1	Southbound	0.2	31.4	22.9								
CA 89/West River St	Intersection 5	Southbound Through			9.3								
CA 89 from West River St to Squaw Valley Rd	Segment 2	Southbound	7.8	46.1	609.1								
CA 89/Squaw Valley Rd	Intersection 11	Southbound Right			4.0								
Squaw Valley Road from CA 89 to Squaw Creek Rd	Segment 8	Westbound	0.5		0.0								
Squaw Valley Rd/Squaw Creek Rd	Intersection 10	Westbound Through			0.0								
Squaw Valley Road from Squaw Creek Rd to Wayne Rd	Intersection 9	Westbound Through	0.9		0.0								
Squaw Valley Rd/Wayne Rd	Segment 9	Westbound	0.6		0.0								
Squaw Valley Road from Wayne Rd to Christy Hill Rd	Intersection 8	Westbound Through			0.0								
Squaw Valley Rd/Christy Hill Rd	Intersection 7	Westbound Through			0.0								
Squaw Valley Rd/Village East Rd	Intersection 6	Westbound Through			0.0								
Squaw Valley Rd/Chamonix Pl	Intersection 6	Southbound U Turn			10.1								
Squaw Valley Rd/Chamonix Pl	Intersection 7	Eastbound Right			0.0								
Squaw Valley Rd/Village East Rd	Intersection 8	Northbound Right			21.1								
Travel through Squaw Valley parking lot			0.2		24.8								
Squaw Valley Road from Christy Hill Rd to Wayne Rd	Segment 9	Eastbound	0.6		0.0								
Squaw Valley Rd/Wayne Rd	Intersection 9	Eastbound Through			0.0								
Squaw Valley Road from Wayne Rd to Squaw Creek Rd	Intersection 10	Eastbound Right	0.9		0.0								
Squaw Valley Rd/Squaw Creek Rd	Intersection 10	Northbound Right			9.5								
Squaw Valley Road from Squaw Creek Road to CA 89	Segment 8	Eastbound	0.5		0.0								
CA 89/Squaw Valley Rd	Intersection 11	Eastbound Right			2.5								
CA 89 from Squaw Valley Rd to Alpine Meadows Rd	Segment 3	Southbound	1.3		2.0								
CA 89/Alpine Meadows Rd	Intersection 12	Southbound Through			0.0								
CA 89 from Alpine Meadows Rd to CA 28	Segment 4	Southbound	3.7		17.4								
CA 89/CA 28	Intersection 13	Eastbound Right			17.4								
CA 89 at Transit Center	Segment 5	Southbound	0.3		0.0								
Total Southbound Analyzed Travel Time					758.6			773.6	15.0		924.1	956.4	32.3
TOTAL ROUTE DELAY								45.0			119.4		

I226

Greg Riessen, PE
July 17, 2015

I226-1 The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

I226-2 The comment suggests that using travel behavior data from a comparable project is erroneous because the analysis does not consider other transportation choices available to visitors. The project's vehicular trip generation was calculated based on a comprehensive analysis of the study area's travel behavior, overnight lodging characteristics, availability of non-auto travel modes, and other considerations. Refer to pages 9-37 through 9-43 of the DEIR for details. Had the analysis speculatively assumed a significant increase in the project's use of transit (relative to the prevailing level of transit usage in the area), there would not have been substantial evidence in support of such an assumption, and the DEIR would have understated foreseeable impacts. The proposed project, however, includes elements to expand transportation choices as identified by the commenter, including expansion of bicycle/pedestrian facilities and funding for expanded regional transit service.

I226-3 This comment introduces the proposed mitigation measure concept of No Net New Trips (NNNT). Responses to comments I226-4 and I226-5 also address this topic. All responses pertaining to this topic are provided in this response.

The commenter suggests that mitigation consisting of a NNNT policy would completely mitigate all traffic impacts. As suggested, the policy would apply to both summer and winter conditions for daily traffic conditions. The discussion of a NNNT policy is categorized into the following sub-sections:

- ▲ No Net New Vehicle Trip policies in other cities/regions,
- ▲ data collection procedures,
- ▲ applicability to Placer County standards, and
- ▲ overall feasibility.

No Net New Vehicle Trip Policies in Other Cities/Regions

The commenter is correct in that policies such as this are in place in various locations both within and outside of California. Fehr & Peers, the transportation consultant for this EIR, is involved in many of those programs, and offers the following insights on some of those programs (based on input provided by the staff working on those projects):

- ▲ City of Santa Monica – The NNNT policy is a key feature of the City's Land Use and Circulation Element. Its success hinges upon future uses consisting of a better mix of land uses, very aggressive transportation demand management (TDM) strategies, and improved non-auto travel options. It is applicable at a City-wide level for the PM peak period (and not daily basis). It is applied a city-wide level, and not on a project-by-project basis.
- ▲ Stanford University – This university is operating under a no net new trips condition, with annual monitoring and consequences (intersection capacity improvements to be funded by Stanford) if the cap is exceeded for 2 out of 3 years. To date, they have met the applicable conditions. Fehr & Peers staff involved in this program stated that the university spends large amounts of money to maintain the trip cap. Further, the University relies on other regional transit infrastructure, such as Caltrain (commuter rail), as a key contributor toward attaining the cap.

- ▲ Mountain View – The City of Mountain View has recently enacted a NNNT policy to address substantial development pressures associated with the rapidly-expanding technology industry. According to Fehr & Peers staff familiar with this City’s proposed program, their goals are yet to be implemented and may be difficult to achieve without major monetary commitments.
- ▲ Silicon Valley Campuses – Fehr & Peers has been involved in TDM programs for various high-tech firms located in Silicon Valley including Google, LinkedIn, and Facebook. Many of these campuses have conditions of approval requiring robust TDM programs so as to not generate any net new peak hour vehicle trips. They have trip caps and there are financial penalties if they exceed them.

There are several major differences between the above cities and campuses and the proposed project and its location. First, the statement in comment I226-5 that “such a policy is as an effective and feasible traffic mitigation measure in the cities of Santa Monica and Mountain View” is not completely accurate. Santa Monica’s policy is applied at a city-wide level during the PM peak period only. Mountain View’s policy has yet to be implemented, so its feasibility and effectiveness are not yet known. Second, the high-tech campuses mentioned above often rely on robust publically-funded rail transit systems as a key component of their TDM programs, whereas transit in the study area is limited to fixed-route bus lines that operate at relatively low frequency. Third, travel to/from these campuses is primarily made by employees whose travel patterns can be more rigorously regulated as compared to recreational travelers (who may need a vehicle to transport ski gear, golf clubs, etc.).

Another component of the high-tech campus’ TDM programs is the substantial volume of private shuttles that serve as fixed-route express. These have been successful, due in part, to employee residential density (i.e., there are enough employees living within a walking distance of the stops such that they are successful). In contrast, Tahoe region housing is more spread out, and visitors have gear and are not as likely to be able to walk to a stop. See the Master Response regarding traffic, which includes a discussion of the effectiveness of a free-fare skier shuttle program operated in the winter of 2012-2013 by the Truckee North Tahoe Transportation Management Association.

In addition to the examples cited by the commenter, Fehr & Peers conducted a review of best practices in other ski resort areas. Park City, Utah, is currently exploring establishing citywide TDM programs. Although not finalized, preliminary indications, based on conversations with staff working on the project, are that achieving meaningful reductions in auto travel in a resort area could be challenging because of difficulties linking high density housing, resort hotel/condo uses, ski areas, and entertainment centers with frequent transit service.

In summary, NNNT policies are in effect in some areas of California. However, they can be expensive to implement and can have limited success depending on a variety of factors ranging from housing density/location, employee/traveler type, and type/level of transit service.

Data Collection Procedures

The comment recommends the placement of permanent year-round in-ground counters at two locations along Squaw Valley Road. The comment also suggests the use of hose counters to measure daily volumes at various private driveways to isolate their traffic generation. The placement of hose counts across private driveways is problematic in three ways. First, the hose would be situated on private property (versus within a public right-of-way), which would require the permission of multiple private landowners. Second, the hose could be destroyed when snow plowing occurs. Third, and most importantly, hose counts do not produce accurate readings when placed in slow speed areas, such as driveways (the

machines have difficulty interpreting major time duration differences between successive axles). In summary, the recommended data collection procedures contained in the comment related to private driveways would be unworkable.

Overall Feasibility

Section 21061.1 of the CEQA guidelines defines “feasible” as being capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors. The proposed policy raises concerns with several of these factors. Given the difficulty transporting tourists to a ski/mountain resort, along with their gear, via public transit; the lack of available regular public transit; and the likely distances and dispersed origins of visitors, it is highly doubtful a public transportation system would effectively transport project visitors. A policy such as this would likely reduce potential visitation to the point where the project would likely be economically infeasible. Further, if Squaw Valley heavily regulates how day skiers arrive (assuming that one could offset project-related visitors by reducing existing day skier traffic), it would likely drastically reduce day-skier use of the resort as they seek other, more convenient options (such as the other ski resorts serving the Tahoe area). This could result in other environmental impacts associated with increased activity at these other resorts. Economic concerns include loss of business revenue and clientele associated with reduced opportunities for both project and non-project land uses in the Olympic Valley to allow customers to drive a vehicle. Technological factors relate to challenges associated with measuring/isolating the trip generation of individual private uses.

In summary, it would be very challenging to effectively implement a NNNT policy, and the likely result (if NNNT is required) is that the proposed project could never get constructed. The addition of hotel/condo uses and retail space next to a major resort like Squaw Valley is a form of TDM in itself, having the general effect of reducing the need to drive to the mountain by giving skiers an option of staying in the village and walking to the lift. Further, providing on-site restaurants and shops offers a fully-functional “neighborhood” whereby guests have options for shopping, dining, and entertainment, without the need to drive to other areas outside of Olympic Valley.

This type of major change in policy is one that is better addressed at the General Plan or Community Plan level, rather than in considering impacts of one specific project (no matter how large). Notwithstanding the above, the comment’s suggestion that a NNNT policy be imposed as project mitigation is being forwarded to the Placer County Planning Commission and Board of Supervisors for their consideration.

I226-4 See response to comment I226-3.

I226-5 See response to comment I226-3.

I226-6 The comment requests information pertaining to where the transportation management plan (TMP) can be review. The TMP consists of the policies included in the VSVSP (Chapter 5 of the specific plan), which are included on pages 9-36 to 9-37, as well as additional management programs that would be adopted from the mitigation measures included in the DEIR (see Mitigation Measures 9-1 (a, b), 9-2 (a, b, c, d), and 9-8 (for construction traffic management)).

I226-7 The comment asks where the Parking Management Plan cited on page 8-3 of the VSVSP is located. This is one of the master plans that will be developed after approval of the VSVSP and before approval of the 1st Lot Tentative Map.

I226-8 The comment is correct in that a detailed evaluation of accident history and safety was not performed along Squaw Valley Road. Guidance for the analysis of project impacts is provided

in the Environmental Checklist found in Appendix G of the CEQA Guidelines. Page 11 specifically states that an evaluation should determine whether “the project would decrease the performance or safety of public transit, bicycle, or pedestrian facilities” or “substantially increase hazards due to a design feature.” The DEIR notes that the project would cause an increase in traffic on Squaw Valley Road. However, the project would not permanently remove any existing sidewalks, crosswalks, or bicycle facilities. Exhibit 3-10 of the DEIR shows the planned Class II bicycle lanes and Class I multi-use paths that would be constructed within the Specific Plan. The Class I multi-use path would extend easterly on the south side of Squaw Valley Road to connect with the existing Class I path. The materials used for bicycle/pedestrian paths would be suitable for snowplowing, making them accessible during the winter. In summary, the project would improve bicycle and pedestrian circulation within the Specific Plan. It would not physically affect any bicycle/pedestrian facilities outside of the Specific Plan and not cause a change in conditions that would result in a ‘substantial increase in hazards.’ For these reasons, the DEIR conclusion on page 9-65 that project impacts on bicycle and pedestrian facilities would be less than significant is correct.

- I226-9 It is assumed that the commenter is speaking to the either the proposed bicycle network shown in Exhibit 3-10 of the DEIR or as shown in Exhibit 3-15. Both figures show a bike path (Exhibit 3-10) or “New Class I Bike Path” (Exhibit 3-15) extending from the eastern edge of the main Village area to Chamonix Place. The comment questions why this path is not extended into the new or existing Village. As shown on both exhibits, three bike lanes (Exhibit 3-10) or “Class II Bike Paths” (Exhibit 3-15) extend south from the Class I bike path into the Village area; one at Far East Road, one at Village East Road, and one at southward turn of Squaw Valley Road. As shown in the road cross section exhibits provided in Chapter 5 of the VSVSP (provided concurrently with the DEIR on the County’s website), these bike paths would consist of a marked bike lane provided on the shoulder of the roadway. Pedestrians would be provided a curb separated walkway. Although a distinct Class I Bike Path provides a greater physical separation from vehicle traffic, a Class II Bike Path/bike lane on the road shoulder provides a designated pathway for bicyclists and is not a safety hazard. Therefore, both pedestrians and bicyclists are provided a designated pathway to move from the New Class I Bike Path, south into the main Village area.
- I226-10 As shown on the Concept Plan on Exhibit 3-6, the East Parcel development would include a new Class I bike path that extends westerly from the parcel, crossing Squaw Valley Road (just west of Squaw Creek Road), and then connecting to the existing Class I path on the south side of Squaw Valley Road. This new connection would enable employees to ride bicycles to/from the Village along a continuous Class I path. The comment suggests that the Class I path within the East Parcel should continue easterly to SR 89. It is noted that a Class II bicycle lane is already present on both sides of Squaw Valley Road between Squaw Creek Road and SR 89. Hence, bicycle facilities are already present along this segment. Further, the project sponsor does not control the property through which the Class I multi-use path would extend if it were to continue easterly.
- I226-11 The commenter asks why a significant impact was not identified resulting from the lack of a connection between the existing path, village, and SR 89. Bicyclists and pedestrians in the Village area would be able to access the existing Class I multi-use path located east of the Plan area on the south side of Squaw Valley Road. Similarly, the East Parcel includes a new Class I bicycle path that connects with the existing path that extends easterly to SR 89. It is also noted that Class II bicycle lanes and shoulders (of widths suitable for bicycling) are also provided on Squaw Valley Road. Based on the above information and the established significance criteria, no such impact would occur.
- I226-12 The comment suggests that a different cross-section should be considered for the segment of Squaw Valley Road between Chamonix Drive and Far East Road. The proposed cross-

section, which is shown on Figure 5-6 of the Specific Plan, consists of a 10-foot multi-use path on the south side, curb/gutter, two 10-foot shoulders and three 12-foot travel lanes. The total width from the back of the multi-use path to the back of curb would be 72 feet. The comment contains a recommended cross-section that would introduce buffered on-street bicycle lanes in both directions of Squaw Valley Road, a 13-foot sidewalk with 6.5-foot planter strip on the south side, and three 11-foot travel lanes. The total width from the back of the sidewalk to the back of curb would be 74.5 feet. However, the cross-section does not show curb and gutter, which if included, would increase the total width to 80.5 feet. The comment's recommended cross-section would require an additional 8.5 feet of width along the south side of Squaw Valley Road. The dimensional analysis provided in response to comment I221-7 also determined a Squaw Valley Road width of 80.5 feet is not feasible due to ROW easement constraints. Further, adding a Class II bicycle lane in this segment would be redundant as the project applicant is providing a Class I bike path.

The comment suggests that *Guide for the Development of Bicycle Facilities, 4th Edition* (AASHTO 2012) recommends a minimum five-foot width from the edge of the multi-use path to the curb. This comment is accurate (see page 5-11 of that document). However, this document does not reflect Placer County requirements for bike paths. Nonetheless, it should be noted that Squaw Valley Road (North) is proposed to include a 10-foot-wide bike path and a total of 13 feet (3-foot curb and gutter and a 10-foot shoulder) from the edge of the bike path to the edge of the travel lane. Therefore, the proposed Squaw Valley Road improvements would provide more than 5 feet of separation. Adding a railing or barrier is not feasible due to snow removal operations.

The comment also states that the proposed width of Squaw Valley Road is too wide and will encourage speeding. The cross-section shown on Figure 5-6 of the Specific Plan would be approximately 60 feet wide, measured from face of curb. All aspects of this cross-section are necessary. The center turn lane is required to provide dedicated left-turn movements into Village East and Far East Road. The shoulders are necessary for a variety of purposes ranging from providing a vehicle breakdown and chain installation area, on-street parking during peak ski days, and snow storage. The recommended cross-section of the Specific Plan would be approximately 59 feet wide (including necessary gutters that were not shown in the comment) as measured from face of curb. Hence, the recommended cross-section would have a nearly identical paved width to the proposed cross-section, but with shoulders replaced by buffered on-street bicycle lanes. As noted previously, shoulders are necessary for a variety of reasons. In conclusion, the commenter has offered no specific evidence as to why excessive speeding would occur.

I226-13

The comment suggests that a different cross-section should be considered for the segment of Squaw Valley Road along the frontage of the East Parcel. The proposed cross-section, which is shown on Figure 5-15 of the Specific Plan, consists of two eastbound travel lanes, a center two-way left-turn lane, one westbound travel lane, one westbound right-turn deceleration lane (into the East Parcel driveway), curb and gutter, Class II bicycle lanes on both sides of the street, and a walkway on the north side of the street. The total width from the back of the walkway to the back of curb would be 86 feet. The comment contains a recommended cross-section that would consist of two eastbound lanes, one westbound lane, buffered bicycle lanes, and sidewalks/planter strips. From back of sidewalk (and added three-foot necessary curb and gutter on each side), this configuration would be 91 feet. The recommended cross-section in the comment would require an additional five feet of width.

The recommended cross-section in the comment would also eliminate the existing two-way left-turn lane, which is an important element of the function of Squaw Valley Road. The two-way left-turn lane enables motorists to turn left onto and off of Squaw Valley Road without disrupting the flow of through traffic. The recommended cross-section would require these

movements to be made from a through lane, which would impede the flow of through traffic and increase the potential for crashes.

The comment also states that the proposed width of Squaw Valley Road is too wide and will encourage speeding. The cross-section shown on Figure 5-15 of the Specific Plan is comparable to what exists presently, but adds a dedicated right-turn deceleration lane into the East Parcel driveway and introduces a sidewalk along the East Parcel frontage. There is no evidence to suggest that introducing a right-turn lane into a specific parcel driveway would cause an increase in vehicle travel speeds. The right-turn lane is necessary to accommodate the level of right-turning traffic into the East Parcel. Without this turn lane, the likelihood for rear-end collisions in the westbound travel lane on Squaw Valley Road could increase. Contrary to the commenter's assertion, the proposed cross-section shown in Figure 5-15 of the Specific Plan would provide a safe design and would not be considered as creating a bicycle and safety impact.

Please also refer to response to comment I287-6 regarding the concept of extending a sidewalk along the north side of Squaw Valley Road to SR 89.

- I226-14 The comment suggests that a pedestrian safety impact should have been identified due to increases in traffic on Squaw Valley Road. The significance criteria for pedestrian impacts relate to disrupting or interfering with existing or planned pedestrian facilities, or causing an unsafe condition for pedestrians. The recommended mitigation in this comment is to install high-visibility marked crosswalks at all intersections along Squaw Valley Road. There is not a nexus to support the need for these improvements as a result of project-added traffic. However, the commenter's suggestion that high-visibility marked crosswalks be installed at all intersections along Squaw Valley Road is being forwarded to the Placer County Planning Commission and Board of Supervisors for their consideration as part of the project approval process.
- I226-15 The comment suggests that a pedestrian safety impact should have been identified at the Squaw Valley Road/Far East Road intersection due to its awkward configuration. As discussed in Chapter 2 of this FEIR, the proposed project now includes a crosswalk adjacent to the Squaw Valley Road/Far East Road intersection. The comment also includes a sketch of a proposed reconfiguration of this intersection. The significance criteria for pedestrian impacts relate to disrupting or interfering with existing or planned pedestrian facilities, or causing an unsafe condition for pedestrians. The commenter's suggestion that the intersection be reconfigured is being forwarded to the Placer County Planning Commission and Board of Supervisors for their consideration as part of the project approval process.
- I226-16 The comment is correct in that traffic control personnel have historically been placed at multiple intersections along Squaw Valley Road. However, it should be noted that these personnel functioned in a primarily passive manner, in which they were not actually assigning right-of-way, but rather observing conditions and 'waving folks through.' Mitigation Measure 9-2b in the DEIR would require placement of traffic control personnel to actively assign right-of-way at either the Wayne Road or Eric Road intersection such that motorists on the side-street can turn onto Squaw Valley Road without incurring excessive delays. This mitigation also involves advance dissemination of information to advise residents of when traffic control will be in place. The comment's suggestion that active traffic management be placed at all intersections along Squaw Valley Road would likely cause worsened congestion and delays along Squaw Valley Road due to frequent stoppages of through traffic.
- I226-17 The mitigation measure of reducing the speed limit on Squaw Valley Road has been evaluated and is described in the Master Response regarding noise. Other effective mitigation of applying rubberized asphalt along Squaw Valley Road has been included in the FEIR that will reduce noise impacts on Squaw Valley Road to a less-than-significant level.

I226-18 DEIR Exhibit 9-3 displays the existing bus stops (with shelters) along Squaw Valley Road, and states that additional stops (without shelters) are also presented along other portions of the roadway. The extent to which TART buses do/don't stop to pick-up or drop-off passengers at mid-point locations between stops is an existing condition that the project would not worsen. The project would construct a new Transit Center near the intersection of Squaw Valley Road and Chamonix Place to be a convenient transit hub for both public and private buses. The center would be designed to be able to simultaneously accommodate two buses. The comment states that TART buses are routed off SR 89 to the existing Squaw Valley Village, which causes 13 minutes of additional travel time for passengers that are not otherwise traveling within Olympic Valley. While this comment is true, it is shown in Table 9-17 of the DEIR that the vast majority of bus passengers boarding or alighting in Tahoe City during a sample of winter weekdays had their trip origin at Squaw Valley. Since most bus riders have an origin or destination at Squaw Valley, it makes sense for the bus to detour off SR 89 to this important destination.

I226-19 The comment states that project implementation would cause several additional minutes of bus travel delays during the peak winter analysis hours. Level of service (LOS) calculations from the DEIR indicate that travel time increases on the SR 89 corridor would be relatively modest with the addition of project trips. During the Winter Saturday AM peak hour, inbound travel to the project from Truckee would experience an average 12 second increase in travel time. The reverse movement during the Winter Sunday PM peak hour would experience a 42 second increase in delay. Refer to the portion of the traffic Master Response regarding transit service expansion as project mitigation.

I226-20 The commenter is correct in that the percent of vehicle demand served in the SimTraffic microsimulation operations model at this intersection under cumulative AM peak hour conditions is not 100 percent. This occurs primarily as a result of the heavy northbound left-turn movement, whose percent demand served is 52 percent. The low percent demand served is the consequence of the heavy northbound left-turn movement, combined with the traffic signal timings that only allow a certain amount of left-turn green time. The results are not incorrect. Rather, they point out the operational issue in the northbound left-turn lane, which is identified as a cumulatively considerable impact in Impact 18-22 on page 18-26 of the DEIR.

I226-21 Table 9-11 of the DEIR mistakenly sources Appendix G. There is no data in Appendix G that pertains to this calculation. The LOS results are obtained by applying the daily traffic volumes to the thresholds in Table 9-7 of the DEIR.

Table 9-11 on page 9-17 of the EIR is revised as follows:

Table 9-11 Placer County Roadway Level of Service - Existing Conditions

Segment	Type	Winter Saturday Daily Conditions		
		Average Daily Traffic	V/C Ratio	LOS
West River Street east of SR 89	Two-Lane Moderate Access Control Arterial	3,800	0.21	A
Squaw Valley Road between SR 89 and Squaw Creek Road	Three-Lane Low Access Control Arterial	12,600	0.56	A
Squaw Valley Road between Squaw Creek Road and Village Area	Two-Lane Low Access Control Arterial	12,900	0.86	D

Note: LOS = level of service; V/C ratio = volume-to-capacity ratio
 Values rounded to the nearest 100 vehicles.

Table 9-11 Placer County Roadway Level of Service – Existing Conditions

Segment	Type	Winter Saturday Daily Conditions		
		Average Daily Traffic	V/C Ratio	LOS

Source: Appendix G Based on comparison to values shown in Table 9-7.

- I226-22 The comment states that the intersection LOS at the Tahoe Y intersection (i.e., the SR 89/SR 28 intersection studied in the DEIR) improves between existing and cumulative conditions. This is incorrect. Under existing conditions (see Table 9-8 in the DEIR beginning on page 9-13), the SR 89/SR 28 intersection operates at LOS B (16.2 seconds per vehicle [sec./veh.] of delay) during the Saturday Winter AM peak hour, LOS B (18.2 sec./veh. of delay) during the Sunday Winter PM peak hour, and LOS C (21.4 sec./veh. of delay) during the Summer Friday PM peak hour. Under cumulative no project conditions (see Table 18.4 in the DEIR on page 18-25), the SR 89/SR 28 intersection operates at LOS B (19.4 sec./veh. of delay) during the Saturday Winter AM peak hour, LOS B (18.5 sec./veh. of delay) during the Sunday Winter PM peak hour, and LOS C (20.9 sec./veh. of delay) during the Summer Friday PM peak hour. Thus, contrary to the statement in the comment that intersection LOS improves “across the winter and summer analysis conditions,” the LOS does not change between the two horizon years. The seconds of delay does decrease by 0.5 seconds under the cumulative condition for the Summer Friday PM peak hour, but this is not sufficient to alter the LOS category. This half second reduction in delay may be due to changes in roadway configurations between the existing and cumulative conditions, changes in turning movement volumes, or other factors and does not call into question the validity or accuracy of the traffic analysis.
- I226-23 It is acknowledged that the intersections along Squaw Valley Road may experience some levels of pedestrian activity during winter months. However, no pedestrian volumes were entered into the Synchro traffic models at these intersections based on winter period field observations. Had a nominal number of pedestrians been added, individual LOS results would not have changed (because the overall delay and LOS is not very sensitive to the pedestrian volume) and the study conclusions would have remained unchanged. In recognition of greater levels of pedestrian activity during the summer, the Friday Summer PM peak hour analysis did include pedestrian volumes at these intersections.
- I226-24 The Squaw Creek Road approach to Squaw Valley Road is of considerable width, but does not have striped left- and right-turn lanes. Accordingly, the winter analysis conservatively assumed a single approach lane. The reported delay represented the weighted average delay between the left- and right-turn movements. The analysis results are correct.
- I226-25 Please see the portion of the traffic Master Response related to transit service expansion.
- I226-26 Please see the portion of the traffic Master Response related to parking supply.
- I226-27 The commenter suggests that preferential parking should be provided for carpools with four-plus skiers per car, as well as free overnight lockers and free parking (whereas other parking would be paid). The proposed VSVSP includes a provision for preferential parking for carpools with four or more occupants (see Section 5.8, Transportation Management). The overall issue of paid parking is discussed in the Master Response regarding traffic. Implementing a financially neutral strategy of paid parking offset by lower ticket prices would raise numerous issues, including (1) how the fact that many day skier vehicles carry more than one day skier should be addressed, (2) how season pass prices would be adjusted, and (3) how such a

program would be implemented and enforced without increasing traffic delays as drivers enter or exit parking facilities. Even if the overall net effect would be financially neutral, some individuals would find their costs increased. This would therefore result in an economic disadvantage to Squaw Valley in comparison with other resorts.

I226-28

The comment notes the values for total vehicle miles travelled (VMT) and VMT within Placer County and/or the Mountain Counties Air Basin (MCAB) and asks which value was used to estimate emissions. Mobile-source emissions of criteria air pollutants and precursors were estimated using the estimated increase in VMT that would occur within Placer County and/or the MCAB, which is 172,168 VMT per day on a peak summer day and 85,398 VMT per day on a peak winter day. However, based on new data, the value for a peak winter day has been reduced to 68,853 VMT per day, the explanation for this change is provided in the response to comment 8d-11. Therefore, the estimates of operational emissions of criteria air pollutants and precursors on a peak winter day are overstated under Impact 10-2 in the DEIR; and the estimate of operational greenhouse gas emissions under Impact 16-2 are overstated in the DEIR. If these values were recalculated, these impacts would still exceed applicable thresholds and Mitigation Measure 10-2 and Mitigation Measure 16-2 would still be required.

Mobile-source emissions of criteria air pollutants and precursors were estimated using the estimated increase in VMT that would occur within Placer County and/or the MCAB, which is 44,104, 014 VMT per year under full buildout of the VSVSP. These values are shown in Appendix H on the sheet titled, "Vehicle Miles Travelled."

The commenter asked if the air quality and greenhouse gas impacts of all the VMT be accounted for in the EIR. The analysis of criteria air pollutants and precursors includes all the VMT that would occur in Placer County, which is the jurisdiction of the Placer County Air Pollution Control District (PCAPCD) and, to be conservative, all the VMT that would occur in parts of the MCAB outside of Placer County. This is explained on page 10-12 of the DEIR. This is because the criteria air pollutants and precursors are pollutants of regional concern and the threshold used to analyze these pollutants are recommended by PCAPCD, which only has jurisdiction over Placer County. Mobile-source emissions in portions of the MCAB were also included because the project is located in a part of Placer County that is part of the MCAB.

The estimate of mobile-source GHGs included GHGs associated with all VMT that would be generated under full buildout of the VSVSP, as explained on page 16-12 of the DEIR. This is because GHGs are a pollutant of global concern rather than regional concern, which is explained on page 16-1 of the DEIR.

Also, see the Master Response regarding traffic for additional detail about how VMT was estimated in the traffic analysis.

I226-29

Please see response to comment I226-3 regarding the feasibility of the NNNT.

I226-30

Exhibits 8-1 and 8-2 in Chapter 8, "Visual Resources," provide the location of photographs taken to characterize typical views of the Valley. Exhibits 8-7 and 8-8 show the viewpoint locations used for the visual simulations. The view of the project site from the mountains was not considered a sensitive view. The current view from the mountain of the site depicts an area, seen from above, with buildings and an asphalt parking lot. The perceived change would be that the parking lot would be replaced by buildings. Because of the angle of this view, from the mountain looking down, no views would be blocked, no scenic resources would be removed or obstructed, and the visual character of the viewshed would not be substantially changed. Therefore, this particular view was not simulated. However, this view

is different at night, where the parking lot is largely perceived as a dark (at night). The existing and simulated night views from this point are provided in Exhibit 8-15.

The visual simulations are a tool to both assist with the EIR impact analysis and to provide the EIR reader an indication of post project conditions. However, there are no requirements in CEQA that visual simulations be generated for a project, and legally adequate assessments of visual resources impacts can be completed without development of visual simulations. However, representative views were simulated to aid in the analysis.

- I226-31 Exhibits 8-11 and 8-12 in Chapter 8, “Visual Resources,” show the existing and simulated view from View Points 3 and 4, which are located in the same place on the north side of Squaw Valley Road looking at Lot 11. The building shown in the foreground that has crossed wooden beams and turrets on the corners is the structured parking. As depicted in the visual simulations, the parking structures would not visually dominate views of the area. Discussion of the visual effects of the parking structures with respect to potential for adverse effect on a scenic vista (Impact 8-1) is included on page 8-48 of Chapter 8, “Visual Resources.”
- I226-32 The comment states that because Lots 20, 21, and 22 would be dedicated to permanent open space, the project should include removal of asphalt along Squaw Peak Road and conversion of the road to a dirt road. The project does not include removing the asphalt along Squaw Peak Road and converting it to a dirt road. Further, Squaw Peak Road is a county road and it is not the County’s intention to convert this to a dirt road.

1227

Maywan Krach

From: Jerry Riessen <j.riessen@comcast.net>
Sent: Thursday, July 16, 2015 11:21 PM
To: Placer County Environmental Coordination Services
Subject: Squaw Valley DEIR comments
Attachments: Squaw Valley DEIR-signed.pdf

Hi Maywan Krach,

Here are my comments. I also mailed them.

I am also concerned about:

1. Please confirm that construction and operations will not change the chemistry of the Squaw Valley Creek such that there are impacts to plants and animals.
2. Please confirm that construction will not happen during breeding season such that there will be impacts to Squaw Valley Creek animals.

I 1227-1
I 1227-2

Thanks,
Jerry Riessen
226 Hidden Lake Loop
Olympic Valley, CA 96146

I227Jerry Riessen
July 16, 2015

I227-1

The comment asks for confirmation that project construction and operation would not change the chemistry of Squaw Creek such that there are impacts to plants and animals. This issue is addressed in Chapter 6, "Biological Resources," of the DEIR (see Impact 6-8 [special-status plants], and Impacts 6-11 through 6-14 [construction phase and long-term creek impacts]). No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is provided here.

I227-2

The comment asks for confirmation that project construction would not occur during the breeding season such that there would be impacts to Squaw Creek animals. This issue is addressed in Chapter 6, "Biological Resources," of the DEIR (see various mitigation measures that specify when construction can occur to avoid breeding seasons for various special-status species). No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is provided here.

1228

From: Jerry Riessen j.riessen@comcast.net
Subject: Fwd: Squaw
Date: July 15, 2015 at 4:23 PM
To: cdraecs@placer.ca.gov

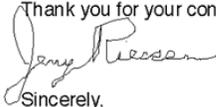
Placer County Community Development Resource Agency
Attention: Maywan Krach
3091 County Center Drive, Suite 190
Auburn, CA 95603

Dear Maywan Krach:

I have owned a home in Olympic Valley for over 30 years. While I support a more vigorous village, I am very worried about the excessive mass and urbanization of this proposal. Some of my concerns about this DEIR are noted below.

I 1228-1

Thank you for your consideration of my concerns.



Sincerely,
Jerry Riessen
226 Hidden Lake Loop
PO Box 2875
Olympic Valley, CA 96146

1. Shadowing study conclusion is flawed. It says:

"Impact 8-4: Create additional shadowing on existing structures or outdoor public gathering areas during a substantial portion of the day. The increased density of structures and increased height of structures would have the potential to increase shadows on public outdoor gathering areas, especially in the winter when the sun is at a low angle. However, because the shadow effect from the mountain to the south of the project site already covers much of the project site in the winter, the seasonal changes to shadowing conditions on adjacent public gathering places would not be worsened by the project. The project's impacts on adjacent properties due to shadowing would, therefore, be less than significant."

Yet DEIR Exhibit 8-21 shows the current and proposed village in full sunshine at noon on December 21. In fact Google Earth for December 21 shows the entire village (current and proposed) in full sunshine at noon. The shadowing study conclusions must be changed and recirculated so the public is properly informed. The mountain to the south of the project does not cover much of the project site in winter.

I 1228-2

Also Google Earth for December 21 shows the village (current and proposed) in full sunshine from 10 am to 4 pm. The study must show the impacts so the public and decision makers can decide what is a significant impact. All times of the day must be evaluated especially in winter. The study does not present enough information for a clear understanding of the shadow impacts. At least show 10 am and 11am December 21. Showing 9am on December 21 is of no value.

Also please confirm the amount of shadowing by the proposed parking structures onto the creek to confirm impacts on current vegetation and animals (as creek restoration will not happen for years) and proposed vegetation and expected animals. What is the required setback for the large parking structure from the creek? A large parking structure right next to a public creek will have impacts on the creek setting. What are they?

2. The proposed tram linking Squaw and Alpine has been fully and repeatedly publicly announced. Most recently, on July 2, 2015 Squaw stated:

I 1228-3

"You, and thousands like you, have expressed interest in staying up-to-date on the proposed base-to-base gondola connection

between Squaw Valley and Alpine Meadows. As such, you are among the first to know that Squaw Valley | Alpine Meadows will soon submit plans to Placer County and the US Forest Service in order to begin the public review and approval process.”

I228-3
cont.

The impacts of the announced project must be evaluated in the cumulative section. What are the impacts of this project?

3. Visual: The new village completely abandons the current open village view of the tram mountain. Isn't this a significant negative visual impact? Is it a negative circulation impact?

I228-4

4. The transition from old village to new village is not clearly described. The public areas are not at the same elevation. Does one walk up and down stairs? How will bikes process from old village to new village? How will handicapped individuals process this transition? Any outdoor stairs will be dangerous in winter. How will this danger be mitigated? How will these stairs be plowed? These poor transitions from existing to new Village areas are inconsistent with the goals of the SVGPLUO and Design Guidelines calling for cohesiveness with the existing village and pedestrian orientation and, as a result, would result in significant land use impacts. The pedestrian safety issues would result in a significant hazard, a CEQA issue.

I228-5

5. The proposed traffic mitigations are unproven and speculative. What happens if the mitigations do not work? What are fall back mitigations? The new village should be allowed in phases with meaningful requirements (water or traffic or noise) and mitigation success demonstrated before the next stage is allowed to go forward. For example, have traffic mitigations worked? Traffic mitigation must be real.

I228-6

6. The Squaw Valley Specific Plan and County policies call out a need for public spaces yet there is no meaningful provision for this such spaces. This should be called a significant negative impact. Certainly since many of the small spaces that are called public will be in shade in the winter. This cannot be considered a valuable public space. What is the required public space for this project and how are those requirements met? A small shaded space should not qualify.

I228-7

7. The DEIR states that visual impacts are for two groups - regular visitors and infrequent visitors. And that regular visitors are a small group and so don't matter much. As shown elsewhere, the 30,000 season pass holders in fact make up by far the majority of the visitors. How can their visual experience be deemed unimportant?

I228-8

Plus, consider a significant site, say the Colliseum in Rome or the Eiffel Tower. Then place a 108 foot building in front of it. Would anyone say the visual experience of the regular viewers doesn't matter?

The visual experience from the too large proposed buildings must be considered significant and unmitigable for all viewers.

8. The DEIR clearly calls out an existing noise level that exceeds county standards in many Squaw Valley area places, certainly including Squaw Valley Road. And the proposed project will make the noise worse. If an area is non attainment for a noise standard, increasing the noise is clearly not acceptable and must be called significant and unmitigable.

I228-9

I228 Jerry Riessen
July 15, 2015

- I228-1 The comment is an introductory statement and does not address the content, analysis, or conclusions in the DEIR. Therefore, a response is not provided here.
- I228-2 See the Master Response regarding the visual impact analysis for a discussion of the shadow study.
- I228-3 See the Master Response regarding the cumulative analysis.
- I228-4 See response to comment I156-3.
- I228-5 See response to comment I156-4.
- I228-6 The comment asserts that traffic mitigations are unproven and speculative, but does not identify any specific mitigation measures to which this assertion applies, provides no details regarding the nature of any deficiencies, and provides no evidence to support the overall assertion. Each mitigation included in Chapter 9 of the DEIR has an evaluation of its ability to address the related impact via the determination of “less-than-significant” or “significant and unavoidable.” Therefore, the DEIR describes how each mitigation measure “will work.” In addition, Placer County has oversight over implementation of mitigation measures through the Mitigation Monitoring and Reporting Program, provided in Chapter 4 of this FEIR. Placer County will have authority to ensure that mitigation measures are implemented as described.
- I228-7 See response to comment I207-7.
- I228-8 See the Master Response regarding the visual impact analysis for clarification regarding the use of viewer groups in the DEIR analysis.
- I228-9 See response to comment I156-6.