



File Code: 2350; 1500
Date: July 17, 2015

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

Dear Placer County Community Development Resource Agency,

The purpose of this letter is to provide official comment regarding Placer County's Draft Environmental Impact Report for the proposed Village at Squaw Valley Specific Plan (the Plan). We appreciate the opportunity to comment on the Plan at this stage. Our concerns include some specific concerns about components of the plan within the Valley, but also about how the plan considers these potential new facilities and the effects of the new development to the surrounding National Forest, its' facilities and resources.

Our concerns are related primarily to trails, proposed for use, which are National Forest System trails or are located on National Forest System land or connect to other high use National Forest trails. What has been described to us is a creative way to address the recreation demands generated by the project. As we understand it, developers will often contribute to a recreation mitigation fund, where the funds are available to the county to develop recreation facilities over time. In this case we understand that the developer proposes to use or augment existing recreational trails to meet much of the demand for recreational activities/facilities.

More specifically:

1. Table 3-3 of the Plan references "New Trail Development," and states: "Improve existing and develop new trail connections between Alpine Meadows and Squaw Valley (extent and location of trail improvement/development not yet confirmed)." The Tahoe National Forest has concerns regarding the potential use of National Forest System lands to complete these "connections". We are also very concerned with the potential impacts to the Granite Chief Wilderness, especially to the Five Lakes Basin and to the Pacific Crest National Scenic Trail. The Five Lakes Basin is already at the upper end of acceptable use. Any potential trail that enters the Granite Chief Wilderness at or adjacent to the Fives Lakes Basin, or connects with the existing Five Lakes Trail, is likely to have significant impacts to National Forest recreational experiences as well as wilderness character. These potential impacts are not addressed anywhere within the Plan. It is possible that the increased use might cause the Forest Service to be forced to restrict use in the wilderness via a wilderness permit system for Granite Chief. That is an expense



that the Forest is not currently prepared to absorb and an impact to the public that may well be a problem. We feel those effects should be addressed using established planning standards for wilderness areas and National Forest System trails.

2. In addition to potential impacts to The Granite Chief Wilderness, the Tahoe National Forest has concerns with impacts to the Pacific Crest National Scenic Trail. Currently, the only two non-motorized earthen trails leading out of Squaw Valley are the Western States and Granite Chief Trails. These trails both intersect the Pacific Crest National Scenic Trail (PCT) which traverses the Pacific Crest above Squaw Valley. It is possible that “new trail connections” could increase use on the PCT –especially if the PCT is used as a potential North to South connection between Alpine Meadows and Squaw Valley. Increased use of the PCT may affect recreational experience as well as degrade the trail itself which is not designed for such heavy use. The potential impacts to the PCT are not addressed anywhere in the Plan.
3. Development of trails or the increase of use in the Five Lakes Basin would also need to be assessed for effects to the recently listed Sierra Nevada Yellow Legged Frog, in the Five Lakes Basin. It is likely that consultation with US Fish and Wildlife Service would be required. We ask a commitment from the County and the developer to put safeguards in place to keep any new user created trails from being created that might impact the frog and the Basin.
4. Table 3-3 of the Plan references “Squaw Valley Trailheads,” and states: “Provide off-street vehicle parking, bike parking, restrooms, and shaded picnic area (space permitting) at the Granite Chief and Shirley Lake Trailheads.” Currently, an unauthorized, unmaintained user created trail, referred to as the “Shirley Canyon Trail,” crosses National Forest System lands in Shirley Canyon. This user created trail has never been approved by the Forest Service nor analyzed for potential environmental impacts. We and are concerned that adding a trailhead will add use and exacerbate current problems. The Forest Service do not feel that this trail has ever been adequately analyzed for appropriate design or environmental impacts and we have concerns that developing the “Shirley Canyon Trailhead” will increase use and potential impacts to sensitive resources where it crosses National Forest System lands. These potential impacts are not addressed anywhere within the Plan.
5. We have been surprised at the limited contact by the developer or the County during most of the planning process, as it relates to these and other trails as well as to Granite Chief Wilderness all of which are likely to be impacted by the development. On Tuesday, March 17th, 2015 a representative of the Tahoe National Forest was invited to meet with Placer County and Squaw Valley staff to discuss potential trail use, expansion, and

design in conjunction with the Plan. At this meeting, the use of National Forest System lands and trails was discussed in the context of the development of a "Trail Plan" to be included as an appendix to the Plan. We felt agreements were made about the Trail Plan. We are now concerned that those agreements are not reflected in this draft Plan and that the "Trail Plan" is not included in the recently released draft Plan, nor are the agreements made that day reflected. At the March meeting, it was mutually agreed that:

- a. The "Trail Plan" would include the development of a lower-canyon "Shirley Canyon Loop Trail" as part of this development project. That loop trail plan would consist of improvements to the existing Granite Chief Trail, a re-routed section of the Granite Chief Trail, major improvements/ re-routes of "Shirley Canyon Trail," and a bridge spanning Squaw Creek. This "Shirley Canyon Loop Trail" would be designed and constructed to a National Forest "Trail Class 3" design parameters (design parameters attached). This "Shirley Canyon Loop Trail" is not mentioned anywhere in the Plan.
- b. It was agreed that a new trail construction into the Granite Chief Wilderness is not acceptable nor would it meet the goal of preserving or enhancing wilderness character. This is not mentioned anywhere in the Plan.
- c. During the meeting my staff shared, and both the developer and county representatives agree that new trail construction through National Forest Systems lands in Shirley Canyon requires environmental analysis as required by the National Environmental Policy Act. In addition, the Forest Service has no plan to construct a National Forest System Trail in Shirley Canyon at this time. The possibility exists for a trail to be constructed under a Special Use Authorization where the proponent bears the full fiscal responsibility for environmental analysis and construction, and monitoring and maintenance over time. The Forest Service has not received an application for a trail in Shirley Canyon at this time. This is not mentioned anywhere in the Plan.
- d. It was also agreed that any new trail constructed across National Forest System lands will have a National Forest "Trail Class 3" design or higher design standard due to the anticipated volume of use (design parameters attached). These design standards are not mentioned anywhere in the Plan.
- e. It was agreed that the Tahoe National Forest cannot be fiscally responsible for any proposed recreational trail use, expansion, and design associated with the Plan. This is not mentioned anywhere in the Plan.

We realize that a development plan of this magnitude is a complicated plan to create and to bring to completion. It is obvious that a great deal of time has been spent on the internal workings of the plan. We feel a good deal of thought is now needed to evaluate and assess the external connections with surrounding lands, systems and infrastructure to make sure that the development fits well in the environment surrounding it. Towards that end, we feel it is imperative that the secondary, off-site and regional effects need to be assessed, particularly as

they relate to the surrounding National Forest System lands. I think we can all agree that we would hate to create improvements that have a negative effect on the wild lands of the National Forest, that are often a big part of why so many people will come here to recreate.

Sincerely,

A handwritten signature in black ink, appearing to read "Joanne B. Roubique". The signature is fluid and cursive, with a long horizontal stroke at the end of the last name.

JOANNE B. ROUBIQUE
District Ranger



Design Parameters

Design Parameters are technical guidelines for the survey, design, construction, maintenance, and assessment of National Forest System trails, based on their Designed Use and Trail Class and consistent with their management intent¹. Local deviations from any Design Parameter may be established based on trail-specific conditions, topography, or other factors, provided that the deviations are consistent with the general intent of the applicable Trail Class.

Designed Use		Trail Class 1	Trail Class 2	Trail Class 3 ²	Trail Class 4 ²	Trail Class 5 ²
Design Tread Width	Wilderness (Single Lane)	0" – 12"	6" – 18"	12" – 24" Exception: may be 36" – 48" at steep side slopes	18" – 24" Exception: may be 36" – 48" at steep side slopes	Not applicable
	Non-Wilderness (Single Lane)	0" – 12"	6" – 18"	18" – 36"	24" – 60"	36" – 72"
	Non-Wilderness (Double Lane)	36"	36"	36" – 60"	48" – 72"	72" – 120"
Design Surface ³	Structures (Minimum Width)	18"	18"	18"	36"	36"
	Type	Native, ungraded May be continuously rough	Native, limited grading May be continuously rough	Native with some onsite borrow or imported material where needed for stabilization, occasional grading Intermittently rough	Native with improved sections of borrow or imported material, routine grading Minor roughness	Likely imported material, routine grading Uniform, firm, and stable
	Protrusions	≤ 24" Likely common and continuous	≤ 6" May be common and continuous	≤ 3" May be common, not continuous	≤ 3" Uncommon, not continuous	No protrusions
Design Grade ³	Obstacles (Maximum Height)	24"	14"	10"	8"	No obstacles
	Target Grade	5% – 25%	5% – 18%	3% – 12%	2% – 10%	2% – 5%
	Short Pitch Maximum	40%	35%	25%	15%	5% FSTAG: 5% – 12% ²
Maximum Pitch Density		20% – 40% of trail	20% – 30% of trail	10% – 20% of trail	5% – 20% of trail	0% – 5% of trail

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Designed Use		Trail Class 1	Trail Class 2	Trail Class 3 ²	Trail Class 4 ²	Trail Class 5 ²
HIKER/PEDESTRIAN	Target Cross Slope	Natural side slope	5% – 20%	5% – 10%	3% – 7%	2% – 3% (or crowned)
	Maximum Cross Slope	Natural side slope	25%	15%	10%	3%
Design Cross Slope	Height	6'	6' – 7'	7' – 8'	8' – 10'	8' – 10'
	Width	≥ 24" Some vegetation may encroach into clearing area	24" – 48" Some light vegetation may encroach into clearing area	36" – 60"	48" – 72"	60" – 72"
Design Clearing	Shoulder Clearance	3" – 6"	6" – 12"	12" – 18"	12" – 18"	12" – 24"
	Radius	No minimum	2' – 3'	3' – 6'	4' – 8'	6' – 8'
Design Turn						

¹ For definitions of Design Parameter attributes (e.g., Design Tread Width and Short Pitch Maximum) see FSH 2309.18, section 05.

² Trail Classes 3, 4, and 5, in particular, have the potential to provide accessible passage. If assessing or designing trails for accessibility, refer to the Forest Service Trail Accessibility Guidelines (FSTAG) for more specific technical provisions and tolerances (FSM 2350).

³ The determination of trail-specific design grades, design surface, and other Design Parameters should be based upon soils, hydrological conditions, use levels, erosion potential, and other factors contributing to surface stability and overall sustainability of the trail.



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Designed Use PACK AND SADDLE		Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5
Design Tread Width	Wilderness (Single Lane)	Typically not designed or actively managed for equestrians, although use may be accepted	12" – 18" May be up to 48" along steep side slopes 48" – 60" or greater along precipices	18" – 24" May be up to 48" along steep side slopes 48" – 60" or greater along precipices	24" May be up to 48" along steep side slopes 48" – 60" or greater along precipices	Typically not designed or actively managed for equestrians, although use may be accepted
	Non-Wilderness (Single Lane)		12" – 24" May be up to 48" along steep side slopes 48" – 60" or greater along precipices	18" – 48" 48" – 60" or greater along precipices	24" – 96" 48" – 60" or greater along precipices	
Non-Wilderness (Double Lane)	Structures (Minimum Width)	60"	60"	60" – 84" Other than bridges: 36" Bridges without handrails: 60" Bridges with handrails: 84" clear width	84" – 120" Other than bridges: 36" Bridges without handrails: 60" Bridges with handrails: 84" clear width	
			Other than -bridges: 36" Bridges without handrails: 60" Bridges with handrails: 84" clear width	Native, limited grading May be frequently rough	Native with some onsite borrow or imported material where needed for stabilization, occasional grading Intermittently rough	
Design Surface ²	Type		≤ 6" May be common and continuous	≤ 3" May be common, not continuous	≤ 3" Uncommon, not continuous	
	Protrusions		12"	6"	3"	
	Obstacles (Maximum Height)					

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Designed Use		Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5
PACK AND SADDLE	Design Grade ²		5% – 20%	3% – 12%	2% – 10%	
	Target Grade		30%	20%	15%	
	Short Pitch Maximum		15% – 20% of trail	5% – 15% of trail	5% – 10% of trail	
	Maximum Pitch Density		5% – 10%	3% – 5%	0% – 5%	
Design Cross Slope	Target Cross Slope		10%	8%	5%	
	Maximum Cross Slope		8' – 10'	10'	10' – 12'	
Design Clearing	Height		72"	72" – 96"	96"	
	Width		Some light vegetation may encroach into clearing area			
	Shoulder Clearance		6" – 12" Pack clearance: 36" x 36"	12" – 18" Pack clearance: 36" x 36"	12" – 18" Pack clearance: 36" x 36"	
Design Turn	Radius		4' – 5'	5' – 8'	6' – 10'	

¹ For definitions of Design Parameter attributes (e.g., Design Tread Width and Short Pitch Maximum) see FSH 2309.18, section 05.

² The determination of trail-specific design grades, design surface, and other Design Parameters should be based upon soils, hydrological conditions, use levels, erosion potential, and other factors contributing to surface stability and overall sustainability of the trail.



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Designed Use BICYCLE	Trail Class 1		Trail Class 2		Trail Class 3		Trail Class 4		Trail Class 5	
	Single Lane	6" – 12"	12" – 24"	18" – 36"	24" – 48"	36" – 60"	48" – 84"	72" – 120"		
Design Tread Width	Double Lane	36" – 48"	36" – 48"	36" – 48"	48" – 84"	72" – 120"				
	Structures (Minimum Width)	18"	18"	36"	48"	60"				
Design Surface ²	Type	Native, un-graded May be continuously rough	Native, limited grading May be continuously rough	Native with some onsite borrow or imported material where needed for stabilization, occasional grading	Native, routine grading with improved sections of borrow or imported materials	Likely imported material, routine grading				
		Sections of soft or unstable tread on grades < 5% may be common and continuous	Sections of soft or unstable tread on grades < 5% may be common	Sections of soft or unstable tread on grades < 5% may be present, but not common	Stable with minor roughness	Uniform, firm, and stable				
Design ² Grade	Protrusions	≤ 24" Likely common and continuous	≤ 6" May be common and continuous	≤ 3" May be common, not continuous	≤ 3" Uncommon, not continuous	No protrusions				
	Obstacles (Maximum Height)	24"	12"	10"	8"	No obstacles				
	Target Grade	5% – 20%	5% – 12%	3% – 10%	2% – 8%	2% – 5%				
Short Pitch Maximum	30%	25%	15%	10%	8%					
	50% on downhill-only segments	35% on downhill-only segments								
Maximum Pitch Density	20% – 30% of trail	10% – 30% of trail	10% – 20% of trail	5% – 10% of trail	0% – 5% of trail					

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Designed Use		Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5
BICYCLE	Target Cross Slope	5% – 10%	5% – 8%	3% – 8%	3% – 5%	2% – 3%
	Maximum Cross Slope	10%	10%	8%	5%	5%
Design Cross Slope	Height	6'	6' – 8'	8'	8' - 9'	8' - 9'
	Width	24" – 36" Some vegetation may encroach into clearing area	36" – 48" Some light vegetation may encroach into clearing area	60" – 72"	72" – 96"	72" – 96"
Design Clearing	Shoulder Clearance	0' – 12"	6" – 12"	6" – 12"	6" – 18"	12" – 18"
	Radius	2' – 3'	3' – 6'	4' – 8'	8' – 10'	8' - 12'
Design Turn						

¹ For definitions of Design Parameter attributes (e.g., Design Tread Width and Short Pitch Maximum) see FSH 2309.18, section 05.

² The determination of trail-specific design grades, design surface, and other Design Parameters should be based upon soils, hydrological conditions, use levels, erosion potential, and other factors contributing to surface stability and overall sustainability of the trail.