

Comments on the Draft Environmental Impact Report Village at Squaw Valley

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3.4.3 Public Services and Utilities

Electrical Power

The Draft Environmental Impact Report has no mention of backup power generation for the facilities proposed. We feel strongly that any building equipped with an elevator should be provided with backup power from a generator with automatic transfer capability.

Propane/Liquified Natural Gas

“Propane to serve the main Village area would be stored at a “tank farm” in the Mountain Maintenance Yard planned at Lot 19 (see Exhibit 35). The storage tank(s) would be periodically filled by tanker truck and would be of sufficient size to support a week or more of propane usage without refilling. It is estimated that storage capacity would total approximately 30,000 gallons per tank, and there could be up to five tanks (four new for the project and one existing that would be relocated).”

This is an interesting idea and is probably one of the only ways in which propane can continue to be used as the primary energy source for heating, however the plan described above doesn't come without significant challenges. Installation of LPG tanks is regulated by the California Fire Code and National Fire Protection Association (NFPA) Standard 58, as well as local ordinance. To accommodate five tanks of 30,000 gallons capacity each, the tank farm will need to be approximately 175' by 150' in size with additional area to accommodate a tractor-trailer combination to fill the tanks and a means of allowing it to turn around. In addition, code requires access along the ends of the tanks for a crane (although this could be the same roadway or pad on which the tanker truck would park to fill the tanks). The overall area required would be about the same whether aboveground tanks, mounded or buried tanks were installed: for 30,000 gallon tanks, a distance of 50' to surrounding structures and a minimum separation of 5' between tanks is required. In order to provide adequate fire suppression and to protect adjoining structures, an additional fire hydrant or hydrants will be required; the number and location will depend on the configuration of the tank farm.

The installation of underground piping, vaporizer units and pressure regulators must also be considered for a propane system, although with the exception of the vaporizers, the same infrastructure would be required if natural gas was proposed as the fuel.

Fire Protection and Emergency Services

As noted in the DEIR, a study (Citygate, 2014) commissioned by Squaw Valley Public Service District to assess the potential impacts of the proposed project identified key components that must be addressed if Squaw Valley Fire Department is expected to maintain or improve the level of service provided to the area it serves. Without recapping the findings of that study here, the statements in the DEIR are generally accurate regarding the study and the facilities it proposed.

One statement with which we would take issue is the notion that the project would pay a “fair share contribution” to construction of the West Valley fire substation, because all of the impacts that would

occasion the development of such a station would result from the proposed development - to impose fees on existing ratepayers or development elsewhere in the Valley would be patently unfair. One item that is not addressed in the DEIR is the potential for the project providing housing for employees who could be 'shared' between Squaw Valley Resort and Squaw Valley Fire Department. There is a significant pool of well-qualified, motivated community college fire academy graduates who are required to fulfill an experience component prior to receiving their Firefighter 1 credential from the Office of the State Fire Marshal. It has long been a goal of Squaw Valley Fire Department to establish a resident firefighter program that would help provide additional staffing for emergencies, replacing the fire department personnel who at one time resided primarily in the Valley or nearby. We believe that there could be a mutually beneficial relationship between Squaw Valley Resort/KSL and Squaw Valley Fire Department in which a small group of these fire academy graduates could be selected each year to work as seasonal, full-time employees at the Resort (and be provided housing in the East Parcel employee housing) while working as part-time firefighters for the Fire Department. The Resort would gain reliable, motivated, presentable staff while the Fire Department would increase the available number of qualified callback personnel for larger emergencies.

We agree with the DEIR for the need for a dedicated emergency helipad for air ambulance transportation of persons with injuries or illness requiring rapid transport to a hospital or trauma or burn center. The timing of the construction of this facility is not, however, addressed in the DEIR.

9.3.3 Issues or Potential Impacts Not Discussed Further

“Effects associated with parking are not considered a significant criterion under CEQA.”

This sentence compromises the validity of almost every other finding, conclusion and mitigation suggested in the section of the DEIR dedicated to traffic and circulation, because virtually ALL of the current issues associated with traffic and circulation in Squaw Valley - and the ripple effects on SR 89, SR28, Donner Pass Road, West River Street and Eastbound I-80 - have their basis in poor planning and management/operation of parking at Squaw Valley Resort.

No amount of off-site parking can compensate for inadequate management of parking within the project area if that poor management results in delays in accessing the base area: it will be difficult enough to convince guests to utilize off-site parking and a connecting shuttle system, but shuttle buses crawling in traffic on Squaw Valley Road will drive a stake through the heart of any glimmer of hope for a successful off-site parking system.

“To manage parking during peak ski days, resort attendants will direct motorists to appropriate lots/garages in an efficient and safe manner.”

This would be a much more compelling promise if Squaw Valley Resort showed any indication of the willingness or capability to address their current parking situation in similar manner: if it can be done in the future, why is it not possible to do so now, when the parking situation is significantly less complex and confusing? As stated above, virtually all of the traffic impacts to roadways in the region can be traced to Squaw Valley's parking lots and the inefficiency with which parking in surface lots (which should be more than capable of managing the demand) is implemented. The inadequate design and staffing of the parking system is merely a software modification: redesigning the parking and access patterns in the parking lots and providing staffing that can quickly, safely and efficiently fill the lots is a matter of making the commitment and a plan, but year after year this potential solution to the traffic

and circulation issues that plague the entire region is ignored. A vague promise to manage parking “in an efficient and safe manner” is an entirely unacceptable answer to an issue that affects not only the vast majority of guests to Squaw Valley, but virtually every resident in the region, has a significant effect on public safety and - save for the four or five busiest days of the year - is predictable and preventable, requiring only the willingness to do so.

Impact 14-7 Increased demand for fire protection and emergency medical services

We again take issue with the notion of a “fair share contribution” for the construction of a fire station in the west end of the Valley. Virtually all of the impacts creating a need for such a station are being created by this project and it would be unfair and inappropriate to apportion the costs of addressing those impacts to other development.

Mitigation Measure 14-7b: Provide additional fire protection facilities and staffing

We agree with the proposed development benchmarks and staffing increments embodied in the Citygate report with the caveat that if fire staffing mitigation phases have been implemented at the time of the achievement of development benchmarks (due to delays in development, for example), achievement of development benchmarks will trigger the implementation of subsequent fire staffing mitigation phases. In other words, the ability of the Fire Department to achieve identified staffing levels independent of the project does not relieve the project of its responsibility to implement succeeding staffing phases as development benchmarks are reached.

In addition, the DEIR seems non-specific on the characteristics of the fire substation being “in place and active” - it should be understood that this means that in addition to the structure having been constructed and operable, there must be adequate available staffing and apparatus to make the substation functional. We would also reference the earlier discussion of the development of a resident firefighter program with shared employees between the Resort and the Fire Department with the provision of employee housing specifically reserved for the use of those shared employees, in a number to be determined by agreement between the Fire Department and project proponents.