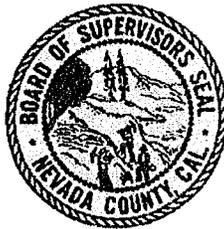


COUNTY OF NEVADA
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Richard Anderson

Supervisor, 5th District

Email: richard.anderson@co.nevada.ca.us
530.582.7826 | FAX: 530.582.7882

June 10, 2015

Maywan Krach, Community Development Technician
Placer County Planning Services Division
3091 County Center Drive
Auburn, CA 95603

RE: Comments on the Draft EIR for the Village at Squaw Valley Specific Plan

Thank you for the opportunity to comment on the draft CEQA document prepared for the Village at Squaw Valley Specific Plan. Please note that Nevada County has not taken a position on the development program proposed by the VSVSP. The comments provided herein are intended, in the spirit of collegiality, to inform Placer County of three issues that are of concern for residents, businesses, and property owners of eastern Nevada County. Suggestions for your consideration are provided where appropriate.

Employee Housing

Placer County has adopted a laudable General Plan policy that requires new development in the Sierra Nevada and Lake Tahoe areas “to house 50 percent of the full-time equivalent employees (FTEE) generated by the development” (*Placer County General Plan Policy C-2*). This is an important first step in meeting the housing demand that will be created by the VSVSP’s commercial land uses. Specifically, the DEIR states “the project is expected to generate an additional 574 FTE employees annually” (page 5-11), with the VSVSP thus required to provide housing for 50 percent of these FTEEs, which equals 287 employees (page 5-12).

A concern for eastern Nevada County, however, is that by focusing on full-time equivalent employees, the DEIR may underestimate—perhaps dramatically underestimate—the amount of employee housing actually needed for new workers at the Village. Employment at tourism-related businesses is often only part-time; two waiters, for example, working half-time across the course of a year at a Squaw Valley restaurant, would equal only one FTEE, yet both workers need housing. Indeed, the transportation section of the DEIR estimates the project’s workforce will total 751 employees (page 9-34), which is 31 percent higher than the 574 FTEE estimate noted in the paragraph above. Given County policy would require the Village to create housing (i.e., beds) for only 287 employees, the remainder, 464 employees, would have to seek housing elsewhere, and do so in a market that is focused toward building high-end vacation homes rather than housing affordable to service workers, and in which existing dwelling units are being converted to short-term vacation rentals, and thus removed from the long-term rental market, to capitalize on VRBO and AirBnB revenue streams.

950 Maidu Avenue, Suite 200, Nevada City CA 95959-8617
phone: 530.265.1480 | fax: 530.265.9836 | toll free: 888.785.1480 | email: bdofsupervisors@co.nevada.ca.us
website: <http://www.mynevadacounty.com/nc/bos>

In fact, 464 employees needing housing might be an underestimate, as the DEIR states that “during peak winter conditions, up to 550 project-related employees may be expected to work in the Village and reside outside of Olympic Valley” (page 9-65). If this is probable, and assuming the phenomenon common in Truckee of service employees renting a house and filling it to capacity, those 550 employees would require at least 92 single-family homes of three bedrooms with two beds each—or 138 two-bedroom units, or 225 one-bedroom units, or some mix between 92 and 550.

In sum, it would be useful for the EIR to realistically evaluate how the project-related workforce will be adequately and affordably housed. Having hundreds of service-wage employees compete for affordable housing in a supply-constrained region would seem a situation that will lead only to heartbreak.

Transportation and Circulation

In 2007, Placer County and the Town of Truckee signed a regional traffic impact fee agreement that recognized development in either jurisdiction would lead to additional traffic in the other, and that each jurisdiction would therefore collect traffic impact fees to mitigate its effect on circulation in the other jurisdiction. As it turned out, the “development funding responsibility” for Placer County and the Town of Truckee were roughly equivalent, so there was no need for an exchange of impact fee revenue (see the Town of Truckee staff report, “Regional traffic impact fee agreement,” dated April 5, 2007). The import of this agreement, however, was that Placer County recognized its decisions could have impacts on a neighboring jurisdiction and that it was reasonable for the County to pay to mitigate these impacts, when significant.

It is unlikely that the proposed Village at Squaw Valley project will significantly impair circulation on roadways under the jurisdiction of Nevada County. The project, however, will affect circulation in the community of Truckee, an incorporated municipality within Nevada County. The significance of these impacts is mostly unknown, because the DEIR limited its analysis relative to the Town to five intersections and one road segment along State Route 89 and one road segment on West River Street.

With regard to those five intersections and two road segments, the DEIR found that the proposed VSVSP project “would cause significant degradations under cumulative plus project conditions” at three intersections, the SR 89/I-80 west-bound ramp, the SR 89/I-80 east-bound ramp, and SR 89 at Donner Pass Road (page 18-24). The DEIR also found “the proposed project would cause cumulatively considerable degradations in operations” on SR 89 between Deerfield Drive and West River Street (page 18-27). According to the DEIR, these impacts, despite being significant, cannot be mitigated (pages 18-24 and 18-29).

Placer County might want to recognize, however, that contrary to the DEIR’s assertions, at least two of these significant impacts of the VSVSP can be partially and perhaps even entirely mitigated. The Town of Truckee has been collecting, for a number of years, AB1600 traffic impact fees to improve the intersection at SR 89 and Donner Pass Road and to also increase the capacity of the segment of SR 89 between Deerfield Drive and West River Street (the “Mousehole” project).

At the very least, it would be reasonable for the proposed project to contribute its fair share toward the SR 89 intersection and roadway costs that have been and are still being borne by new development within Truckee. Similarly, it would be reasonable for the County to more fully examine the regional

circulation implications of the Village at Squaw Valley Specific Plan (including updating LSC's 2005 *Placer County/Truckee Joint Traffic Impact Fee Study*) and determine whether additional project-related mitigations outside of Placer County are necessary.

Water Quality, Water Quantity, and Fisheries

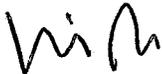
The Truckee River serves as an important recreational sport-fishing amenity for Placer County, Nevada County, the Town of Truckee, Sierra County, and jurisdictions to the east, in the state of Nevada. The river also holds Lahontan cutthroat trout, a federally listed threatened species that the U.S. Department of Fish and Wildlife is trying to restore within the Truckee River watershed. Project-related degradation of water quality and, perhaps more critically, loss of trout habitat from project-related sedimentation and water drawdowns, are issues that can affect visitor-related economic activity and the quality of life of people who live here or own second homes in the area.

Although the VSVSP DEIR discusses the project's potential negative impact to Squaw Creek's aquatic habitat and trout, it largely ignores the Truckee River, to which Squaw Creek is a notable tributary. Placer County should consider having the CEQA document examine the project's potential sediment impacts to the Truckee, and also discuss the potential effects, during common dry periods as well as periods of more extreme drought, that ground-water pumping in Squaw Valley might have on the river's flows, on the ability of the river to sustain a wild-trout fishery downstream of the creek's confluence, and on the ecological health of the river.

In addition, to ensure the effectiveness of its water-quality and aquatic-habitat-protection BMPs, Placer County should consider a mitigation that establishes a long-term monitoring program to evaluate whether these BMPs are performing adequately and truly protecting Squaw Creek, the Truckee River, and the trout populations and aquatic environment of both waterways. At a minimum, during storm events and spring snowmelt, grab samples at Squaw Valley drainage outflows could help determine whether sediment-control BMPs are indeed halting the ingress of sediment into Squaw Creek. The long-term monitoring of benthic macroinvertebrates within Squaw Creek might also have value for examining the effectiveness of project BMPs as well as overall stream health.

Whatever the merits of the proposed Village at Squaw Valley Specific Plan, it has troubling implications for housing, transportation, and the environment that extend beyond the boundary of Placer County. Thank you for any consideration you might give toward resolving these concerns.

Cordially,



Richard Anderson
Supervisor, District 5
Nevada County