

# TRUCKEE RIVER WATERSHED COUNCIL

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July 17, 2015

Ms. Maywan Krach, submitted via [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

Environmental Coordination Services

Community Development Resource Agency

3091 County Center Drive, Suite 190

Auburn, CA 95603

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

Ms. Krach:

The Truckee River Watershed Council (TRWC) appreciates the opportunity to provide comment on the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley Specific Plan.

The mission of TRWC is to bring the community *Together for the Truckee* to protect, enhance and restore the Truckee River watershed. Based on our mission, we reviewed the DEIR with interest and offer the following comments.

**Development can help (or hurt).** Our watershed has a 150 year history of land uses that have led to degradation of water quality, water supply, and habitat. Past developments in Olympic Valley are part of these legacy land uses and have resulted in significant detriment to:

- water quality (Squaw Creek TMDL, Lahontan Water Board, 2006);
- habitat (i.e. loss of the Lahontan Cutthroat trout, the only native trout);
- water supply.

The Village at Squaw Valley Specific Plan is an opportunity to address these impacts on the mountain and in the village and from the headwaters of Squaw Creek to its confluence with the Truckee River.

**Help Squaw Creek: Expand the reaches to be restored and make the restoration a condition of approval.** The proposed stream work is an enhancement of the Trapezoidal Channel and of the Olympic Channel. Within the existing development of Squaw Valley, true restoration cannot happen. As such the proposed work is already a significant compromise. But more geomorphic and hydrologic benefit can be realized than is being proposed. The restoration should be expanded to include the south fork of Squaw Creek above the confluence with the north fork (Shirley Canyon) of the creek.

Additionally, all restoration should be a condition of approval for the specific plan.

**Help the Restoration: Schedule restoration as “Phase 0.”** Due to Squaw Valley’s geographic location and topography the interaction of meteorology and climate result in Squaw Valley being a significant source of flood flows and severe erosion, not only in Squaw Valley but through the entire Truckee River system down to Reno, NV. The legacy alteration of Squaw Creek has exasperated the potential flood threat in Squaw Valley and downstream. By including the restoration at the earliest phases we take the opportunity the development provides to address:

- decreasing the impact of flood flows;
- implementing water quality improvements immediately; and
- contributing toward to attainment of the Squaw Creek TMDL

Additional benefits of moving the restoration to Phase 0 include grading and construction efficiencies across restoration and development, enhancing Squaw Creek as a visual “amenity” and demonstrating goodwill to the community.

**Help the Trapezoidal Channel reach: Widen the bridge spans.** The proposed restoration is constrained by the width of the existing bridges. The bridges were installed based on hydrologic modeling completed in the 1950s. Recognizing the opportunity provided this Specific Plan, the bridges should be replaced, using current hydrologic modeling to determine the appropriate span for floodplain restoration and for the flows moving the channel and.

**Help Lower Squaw Creek: Create conformance of the restoration design of the Trapezoidal Channel.** There is an opportunity to support the downstream restoration of Lower Squaw Creek and Meadow. This will significantly improve the potential success of the

Lower Squaw Creek restoration and improve water quality, water supply, and habitat throughout the entire watershed. The restoration work in the Trapezoidal Channel should be required to conform to the hydrology and aesthetics of the Lower Squaw Creek restoration design.

**Help sustain ground and surface water: Accelerate the completion of the Pumping Management Plan to be completed before the Final EIR.** We recommend the Final EIR be based on a completed Pumping Management Plan and on the most recent groundwater surface-water interaction studies. Increased groundwater production will have potentially significant impacts on surface water, sensitive habitats, groundwater patterns, recharge, and aquifer storage.

Again, we have an opportunity to correct past land use mistakes, use the best available information, and make decisions today that correct the mistakes of yesterday. Decisions about the health of lower Squaw Creek and meadow should not be based on after-the-fact monitoring and future plans and potentials.

**Help improve water quality with stormwater management: Have robust stormwater management a condition of approval.** Squaw Valley's location at the headwaters of the Truckee River Watershed makes the protection of water quality crucial. Low impact development methods and active treatment systems should be incorporated into conditions of approval for the specific plan. Squaw Valley could set the standard for stormwater treatment in alpine development.

**Help improve water quality with snowmaking management: Have robust snowmaking management a condition of approval.** Due to the potential impacts on water supply, water quality and habitat, a complete snowmaking plan should be required as part of the Specific Plan. The contribution of snowmaking water use and storage is part of the cumulative effect on water supply and quality. The potential impact of snowmaking repairs and new infrastructure could be substantial.

**Help the upper watershed: Address restoration in the headwaters.** The DEIR does not address restoration of the headwaters areas of the Squaw Valley. Yet restoration of the upper reaches of the north and south Forks of Squaw Creek are vital to: the successful enhancement and restoration of the downstream reaches; decreasing flood flows; decreasing sedimentation; and improving riparian and meadow habitat. To address the

legacy issues of ski resort development and improve water quality, water supply, and habitat for the future, the Final EIR should address the upstream degradation.

**Help the trails: improve to current standards and schedule into "Phase 0."** The existing trail system is heavily used and poorly implemented. The trails are sources of erosion and water quality degradation from sheet flow and trail/stream crossings. User defined trails can impact wildlife, particularly during breeding and rearing periods. Use of trails will increase with the development of the village, so all trails should re-developed to current standards in "Phase 0" as a condition of approval.

In conclusion, TRWC's goal is to complete 50 high priority projects in the next ten years in order to improve the health and function of the Truckee River watershed. Restoration of Squaw Creek consistently ranks as a top priority for TRWC, our stakeholders, and the community at large. The development of the Village at Squaw Valley Specific Plan is an opportunity to fix water quality, water supply and habitat problems.

Thank you again for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Lisa Wallace". The signature is written in a cursive, flowing style.

Lisa Wallace  
Executive Director