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July 13, 2015

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

SUBJECT: Village Inn Owners Association Comments on Draft Environmental Report for Village at Squaw Valley Specific Plan (VSVSP)

Dear Ms. Krach,

The following comments concerning the above referenced Draft Environmental Report (DEIR) for the Village at Squaw Valley Specific Plan (VSVSP) were authorized by the Village Inn Owners Association (VIOA) Board of Directors (BOD), the governing body for the Olympic Village Inn (OVI), on June 27, 2015.

- Adverse effect on a scenic vista (construction and operations as experienced by long-term residents)

VIOA COMMENT: The DEIR is inadequate in its evaluation of the scenic impact on OVI due to the limited visual analysis conducted from OVI's property. Only one view was included in the DEIR. The VIOA BOD recommends that the DEIR be amended to identify the effect on OVI of the proposed project's development south and west of OVI; and east from Building B (wing of OVI that trends southwest from central registration); and the visual effect of the entrance to the Mountain Maintenance proposed facility (as this entrance also is an entrance to OVI).

Analysis

The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet and visual ambience that OVI currently enjoys. Many owners and guests of OVI have expressed their concern about the potential visual and noise impact of proposed development surrounding OVI. The current visual ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The VIOA BOD recognizes that as the project develops, visual impacts will occur, but the current DEIR does not provide an adequate analysis for the BOD to use when reviewing new, specific development adjacent to OVI.

- Substantially degrade the existing visual character or quality of the site and its surroundings (construction)

VIOA COMMENT: The DEIR is inadequate in its evaluation of the scenic impact on OVI due to the limited visual analysis conducted from OVI's property. Only one view was included in the DEIR. The VIOA BOD recommends that the DEIR be amended to identify the effect on OVI of the proposed project's development south

and west of OVI; and east from Building B (wing of OVI that trends southwest from central registration); and the visual effect of the entrance to the Mountain Maintenance proposed facility (as this entrance also is an entrance to OVI).

In addition, the VIOA BOD requests that the opportunity through the Placer County Design/Site Review Committee (D/SRC) process to evaluate compliance with the design standards adopted in the specific plan be included in any approval of the Specific Plan.

Analysis

The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet and visual ambience that OVI currently enjoys. Many owners and guests of OVI have expressed their concern about the potential visual and noise impact of proposed development surrounding OVI. The current visual ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The VIOA BOD recognizes that as the project develops, visual impacts will occur, but the current DEIR does not provide an adequate analysis for the BOD to use when reviewing new, specific development adjacent to OVI. Once the DEIR is amended to address the issue described in this analysis, the retention of the compliance process will provide the vehicle for the VIOA BOD to comment on specific issues.

- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (operations)

VIOA COMMENT; The DEIR is inadequate in its evaluation of the effect of light sources from adjacent development on OVI due to the lack of any analysis. The VIOA BOD recommends that the DEIR be amended to identify the effect of light sources from the proposed project's development east, south and west of OVI.

Analysis

New light sources have the potential of brightening the area around the OVI buildings. The DEIR could have done a photo simulation of the effect of surrounding light sources as was done in the example for the core village. Notwithstanding the light standards in the specific plan (which are more aspirational than definitive), there will be an eventual degradation of the dark skies in the immediate area; it is just too difficult to quantify what that might be without a more specific analysis as requested in the comment. As with visual impacts, the continued enjoyment of OVI by its owners and guests is dependent in large part on the night sky ambience that OVI currently enjoys. This ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort.

- Impacts to Placer County intersections (Transportation and Circulation)

VIOA COMMENT: The VIOA BOD has considerable concerns about the effect on its owners and guests of being able to timely access and depart from OVI during Sundays when check-in and check-out at the resort occurs. The VIOA BOD would strongly urge that alternatives to using Squaw Valley Road be incorporated into the Specific Plan.

Analysis

OVI will be affected by increased auto traffic as the project builds out and the VIOA BOD endorses the inclusion of alternatives to using Squaw Valley Road during peak times. Some alternatives that should be considered are expanded TART schedules, remote parking lots with shuttles to the projects lodging facilities, and staggered employee schedules.

- Construction noise impacts

VIOA COMMENT: For an area whose economy relies on tourism, the noise periods permitted for construction activity by county ordinance are inappropriate. The VIOA BOD recommends that the weekday period for construction commence at 8:00 a.m. and end at 6:00 p.m.; and that Saturday construction commence at 9:00 a.m. to 6:00 p.m. on and no construction be permitted on Sunday. The VIOA BOD further endorses the proposed construction noise mitigation measures identified in the DEIR, especially the notification of affected properties. The VIOA BOD further recommends that notification of the use of helicopters for construction activity be required at least one week prior to the date(s) of helicopter activity.

Analysis

The DEIR specifically identifies OVI as one of the developed properties that could be affected by construction noise. Placer County exempts from its maximum noise levels daytime construction activity (6:00 a.m. to 8:00 p.m., Monday through Friday, and between 8:00 a.m. and 8:00 p.m. Saturday and Sunday). The DEIR also anticipates some night-time construction activity when necessitated by construction practices, i.e. concrete pours for building foundations. Although these standard noise mitigation measures may be appropriate for non-tourist areas, they are inappropriate for areas such as Squaw Valley that rely on tourism for its economy. The location of OVI lends itself to excessive noise intrusion as it backs up against steep hills that will reflect noise onto OVI. The hours that construction and the attendant noise are permitted should be scaled back as recommended in the VIOA BOD comments so that the ambience that is so important to the economic health of OVI is not unduly affected. Notification of affected properties is required by the proposed noise mitigation measures which will assist OVI reservation staff in identifying to owners and guests when construction noise might be occurring. The VIOA BOD is especially concerned about the attendant noise emanating from helicopters used for construction activity as that noise can be very onerous.

- Substantial adverse cumulative effect on a scenic vista

VIOA COMMENT: The DEIR is inadequate in its evaluation of the scenic impact on OVI due to the limited visual analysis conducted from OVI's property. Only one view was included in the DEIR. The VIOA BOD recommends that the DEIR be amended to identify the effect on OVI of the proposed project's development south and west of OVI; and east from Building B (wing of OVI that trends southwest from central registration); and the visual effect of the entrance to the Mountain Maintenance proposed facility (as this entrance also is an entrance to OVI).

Analysis

The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet and visual ambience that OVI currently enjoys. Many owners and guests of OVI have expressed their concern about the potential visual and noise impact of proposed development surrounding OVI. The current ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The VIOA BOD recognizes that as the project develops, visual impacts will occur, but the current DEIR does not provide an adequate analysis for the BOD to use when reviewing new, specific development adjacent to OVI.

- Contribute to cumulative light and glare or skyglow effects in the region

VIOA COMMENT: The DEIR is inadequate in its evaluation of the effect of light sources from adjacent development on OVI due to the lack of any analysis. The VIOA BOD recommends that the DEIR be amended to identify the effect of light sources from the proposed project's development east, south and west of OVI.

Analysis

New light sources have the potential of brightening the area around the OVI buildings. The DEIR could have done a photo simulation of the effect of surrounding light sources as was done in the example for the core village. Notwithstanding the light standards in the specific plan (which are more aspirational than definitive), there will be an eventual degradation of the dark skies in the immediate area; it is just too difficult to quantify what that might be without a more specific analysis as requested in the comment. As with visual impacts, the continued enjoyment of OVI by its owners and guests is dependent in large part on the night sky ambience that OVI currently enjoys. This ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort.

- Cumulative short-term construction-generated noise

VIOA COMMENT: For an area whose economy relies on tourism, the noise periods permitted by county ordinance are inappropriate. The VIOA BOD recommends that the weekday period for construction commence at 8:00 a.m. and end at 6:00 p.m.; and that Saturday construction commence at 9 a.m. to 6 p.m. on and no construction be permitted on Sunday. The VIOA BOD further endorses the proposed construction noise mitigation measures identified in the DEIR, especially the notification of affected properties. The VIOA BOD further recommends that notification of the use of helicopters for construction activity be required at least one week prior to the date(s) of helicopter activity. In addition, the VIOA BOD endorses the proposed construction noise mitigation measures identified in the DEIR, especially the notification of affected properties.

Analysis

The DEIR specifically identifies OVI as one of the developed properties that could be affected by construction noise. Placer County exempts from its maximum noise levels daytime construction activity (6:00 a.m. to 8:00 p.m., Monday through Friday, and between 8:00 a.m. and 8:00 p.m. Saturday and Sunday). The DEIR also anticipates some night-time construction activity when necessitated by construction practices, i.e. concrete pours for building foundations. Although these standard noise mitigation measures may be appropriate for non-tourist areas, they are inappropriate for areas such as Squaw Valley that rely on tourism for its economy. The hours that construction and the attendant noise are permitted should be scaled back as recommended in the VIOA BOD comments so that the ambience that is so important to the economic health of OVI is not unduly affected. Notification of affected properties is required by the proposed noise mitigation measures which will assist OVI reservation staff in identifying to owners and guests when construction noise might be occurring. The VIOA BOD is especially concerned about the attendant noise emanating from helicopters used for construction activity as that noise can be very onerous.

- Tree Removal (Biological Resources)

VIOA COMMENT: The VIOA BOD endorses the requirement of a conditional use permit and tree removal permit for development of Lot 18 as this will provide the VIOA BOD with the opportunity to evaluate the effect on OVI of development on this parcel.

Analysis

The Draft DEIR identifies the change in land use on Lot 18 from Forest Reserve (FR) to Village Commercial (VC) as having a significant biological impact on Lot 18: the development directly west of OVI. The development of the property as fractional ownership units will necessitate the removal of trees. Because the site plan is conceptual, it is difficult to determine the amount and location of the trees to be harvested and the effect on water quality, air quality, storm drainage and visual on OVI. Mitigation measures in Placer County code do require a tree removal permit to be obtained prior to

construction. This would be in addition to the conditional use permit currently also required as a process in the specific plan.

- Tree Removal (parcels south of OVI) (Biological Resources)

VIOA COMMENT: 1) The DEIR is inadequate in its evaluation of the scenic impact from OVI due to the limited visual analysis conducted from OVI's property. The VIOA BOD recommends that the DEIR be amended to identify the effect of the proposed project's development south and west of OVI. 2) The DEIR is inadequate in its evaluation of the effect of light sources from adjacent development on OVI due to the lack of any analysis. The VIOA BOD recommends that the DEIR be amended to identify the effect of light sources from the proposed project's development east, south and west of OVI. 3) The VIOA BOD recommends that a mitigation be required in the final EIR that obligates Squaw Valley Real Estate (SVRE) and the VIOA BOD to reach a mutual understanding regarding the tree easement that covers the existing trees located south and east of the OVI property. 4) The VIOA BOD endorses the requirement of a conditional use permit and tree removal permit for development of Lots 14, 15 and 18 as this will provide the VIOA BOD the opportunity to evaluate the effect of development on these parcels.

Analysis

Though the biological resources portion of the DEIR does not call out the removal of trees south and east of OVI as a significant impact; the issue of resolving the definition of a tree easement that is part of a draft memorandum of understanding (MOU) between the VIOA BOD and SVRE is still outstanding. How the definition of the number, location and types of trees allowed to be removed under the tree easement is critical to the level of noise and visual impact OVI will experience during and after construction of the property south of OVI.

- Construction vibration impacts (Noise)

VIOA COMMENT: The VIOA BOD recommends that the time frame allowed for pile driving activity be amended to only allow such activity between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday and prohibited on Saturday and Sunday for activities adjacent to OVI.

Analysis

The DEIR identifies pile driving activity as a potentially significant effect on nearby developed property. It is likely that OVI is going to experience pile driving vibrations for the development proposed adjacent to OVI. The continued enjoyment of OVI by its owners and guests is dependent in large part on the quiet ambience that OVI currently enjoys. This ambience has a direct effect on retaining current owners (annual maintenance fees); attracting guests (rental fees); and sales to new owners (annual maintenance fees) – all which contribute to the financial health of the resort. The proposed DEIR mitigation measures appear to be adequate except for the time frames that are proposed for pile driving activities; these seem to be overly generous.

- Exposure of new sensitive receptors to existing and new stationary noise sources.

VIOA COMMENT: The VIOA BOD endorses the mitigation measures associated with the impact of “Exposure of new sensitive receptors to existing and new stationary noise sources”.

Analysis

The DEIR identifies new noise sources from the project on existing development. The effect on OVI could be significant, especially from the proposed hotel to the east of OVI. The mitigation measures proposed in the DEIR focus on the noise levels allowed during the operation of the new development (much like the quiet hours that OVI requests of its guests and owners) and the need to obtain special permits for events. These mitigation measures should be adequate to result in good neighbors to OVI.

- Sequencing of Development of the Project

VIOA COMMENT: The VIO BOD requests that a preliminary sequencing of development of the specific plan be included in the final EIR.

Analysis

The VIOA BOD recognizes that the build-out of the project is dependent on market conditions and therefore the specific plan only identifies a potential 25 year build-out period. This lack of identifying the location of development within this 25 year period makes it extremely difficult for existing development to plan for mitigation measures and notice to owners and guests of possible construction activity. A preliminary schedule that could be amended would greatly assist resorts such as OVI plan for the development of the specific plan. A preliminary schedule would also assist in the marketing of the resort.

The VIOA BOD appreciates the opportunity to comment on the DEIR for the VSVSP. Should you have questions concerning our comments, please direct them to Michael Harper, FAICP, VIOA Board Member, at 775-825-1422 or retcoplnr09@hotmail.com.

Comments prepared by Michael A. Harper, FAICP from input provided by the Village Inn Owners Association Board of Directors.

Approved by the Village Inn Owners Association Board of Directors.

ALAN TRAENKNER

Alan Traenkner, President, Board of Directors
Village Inn Owners Association

XC: Members, VIOA BOD; Mark Zimmerman, VIOA Resort Manager