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Date: July 16, 2015
To: Mr. Alex Fisch and Mr. Sean Bechta
From: The League to Save Lake Tahoe

Re: Comments on Draft Environmental Impact Report (EIR) for the Village at Squaw Valley Specific Plan

Dear Mr. Fisch and Mr. Bechta,

The League to Save Lake Tahoe (the League) is grateful for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley Specific Plan (Specific Plan). While the assessment was thorough on significant and cumulative impacts to the project area, it lacked a general analysis of cumulative impacts to the Lake Tahoe Basin. The Specific Plan lies outside of the Lake Tahoe Basin and the jurisdiction of the Tahoe Regional Planning Agency (TRPA), but will still have environmental consequences to the Basin. Because of the importance of Lake Tahoe as an Outstanding National Resource Water, as well as the unique and comprehensive environmental standards governing the Lake Tahoe Basin, it is essential that the environmental analysis look closely at all impacts to the Basin. The following comments address the concerns of the League as they relate to impacts to the Lake Tahoe Basin:

1. **Lack of overall assessment of traffic related cumulative impacts to the Lake Tahoe Basin**
 - a. **There must be coordination between the environmental review and the new Fanny Bridge project for a true level of service (LOS) determination and mitigation**
 - b. **There must be an assessment to the increase of vehicle miles traveled (VMT)**
 - c. **There should be details as to how air quality, greenhouse gas emissions, and water quality could be impacted with increased VMT**
 - d. **The Specific Plan project applicant should provide transit services to the Lake Tahoe Basin to mitigate traffic impacts to Lake Tahoe**

2. **Lack of overall assessment of visual and scenic cumulative impacts to the Lake Tahoe Basin**
3. **The Reduced Density Alternative should be assessed for economic feasibility and considered as a serious alternative**

Background

The Specific Plan has been brought forth by Squaw Valley Real Estate, LLC. (project applicant) to Placer County for approvals to entitlements. The proposed Specific Plan is massive and will come with several significant and unavoidable environmental impacts. The Specific Plan would upgrade the existing Squaw Valley Ski Resort by adding 1,493 bedrooms associated with hotel and resort residential uses provided in up to 850 units, up to a maximum of almost 300,000 square feet of commercial uses, a Village Core, restoration of Squaw Creek, forest recreation uses, conservation preserve uses, a Mountain Adventure Camp, and a transit center with parking facilities.¹ The Specific Plan is located outside of the Lake Tahoe Basin, but is close enough in proximity that consequences relating to the substantial development will occur in the region. The consequences to the Lake Tahoe Basin were disregarded in the DEIR.

The League is the longest running advocacy organization for Lake Tahoe. The League is responsible for watchdogging any plans or projects that could negatively impact the environment of Lake Tahoe. Lake Tahoe is a nationally protected natural resource governed by the TRPA. The Specific Plan falls under the general jurisdiction of Placer County. However, TRPA requirements cannot be overlooked when the Specific Plan will be impacting its jurisdiction. The TRPA regulates through its Regional Plan Update (RPU) and associated Code of Ordinances (the Code). The DEIR outlines several associated impacts to its surrounding environment while ignoring the neighboring Lake Tahoe Basin. The Final Environmental Review (FEIR) must solve this problem by not only analyzing the impacts, but also providing for the appropriate mitigation measures.

1. Lack of Overall Assessment of Traffic Related Cumulative Impacts to the Lake Tahoe Basin

The DEIR lacks an overall assessment to potential impacts as they relate to traffic in Lake Tahoe. The Traffic and Circulation section does analyze the increase of traffic to the project area and areas entering the Specific Plan. It glosses over increase of congestion to Tahoe City (which is within Lake Tahoe) by citing that congestion is already a problem in the area. The DEIR justifies any potential concerns to Lake Tahoe by citing existing conditions. Citing existing conditions or not including potential impacts to Lake Tahoe makes this review insufficient. The following traffic related concerns must be included in the FEIR.

- a. **There Must be Coordination Between the Environmental Review and the New Fanny Bridge Project for a True Level of Service (LOS) Determination and Mitigation**

¹ Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Introduction p.1-1.

The DEIR does not consider the recently approved TRPA/Caltrans/Tahoe Transportation District State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge project) in its analysis of impacts to level of service (LOS) in Tahoe City. The analysis cites that the intersection of SR 89 and SR 28 in Tahoe City already has an existing LOS of D. It states that this will not change with the existing conditions plus the Specific Plan (Existing Plus Project Conditions) so no adverse effect would be generated.² The Fanny Bridge project has been approved to alleviate traffic congestion in Tahoe City and improve the LOS. There will be a roundabout instead of the stoplight and another roundabout on SR 89 closer towards the Specific Plan project area.³ The traffic generated by the Specific Plan has the potential to degrade the LOS the Fanny Bridge project is aiming to improve. The Fanny Bridge project is projected to break ground in 2016 and be completed in 2018. It will be completed long before the Specific Plan begins and completes construction. There must be coordination as to how the Specific Plan will increase traffic and congestion in Tahoe City and the West Shore considering the Fanny Bridge project. If the FEIS determines there will be impacts to North Lake Tahoe and overall LOS following the Fanny Bridge project, there must mitigation measures detailed before the Specific Plan is approved.

b. There Must be an Assessment of the Increase of Vehicle Miles Traveled (VMT)

The DEIR is inadequate in explaining vehicle miles traveled (VMT) determinations and does not assess potential increase of VMT to the Lake Tahoe Basin. The VMT conclusions are confusing and not properly discussed. It states (in Section 10 Air Quality),

“Mobile-source emissions of CAPS and precursors under the proposed project would result from visitor trips, employee commute trips, and other associated trips. Table 10-5 summarizes the trip generation and VMT estimates for both the peak winter and peak summer days under both 20 percent of buildout in first year scenario and full buildout of the Specific Plan. Under full buildout...the project would generate up to 2,821 trips per day and 85,398 VMT in Placer County and/or the MCAB during the peak day of the winter season and up to 8,410 trips per day and 172,168 in Placer County and or the MCAB during the peak season summer all day [According to the analysis presented in Chapter 9, “Transportation and Circulation,” another 86,912 VMT would be generated by the project on a peak summer day that would occur outside of this area but this portion of VMT would be split among the areas of Nevada, El dorado County, and counties in Sacramento and Bay Area regions (Fehr & Peers 2014). Thus mobile source emissions associated with this portion of VMT would be split among multiple other air basins.]⁴”

This citation is confusing because there is no mention of VMT or how it is assessed in Chapter 9 as referred to. Chapter 9 attempts to calculate different regions from where trips are generated by

² Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Traffic and Circulation. p.9-59,60 (Table 9-21).

³ SR 89/Fanny Bridge Community Revitalization Project. TTD/TRPA/FHWA-CFHD. March 2015. Final EIR/EIS/EA. p.2-11.

⁴ Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Air Quality. p.10-15 (Table 10-5).

percentage, but does not give any details to VMT analysis. The citation above also does not justify how these numbers were determined. Not only is the analysis itself confusing, Lake Tahoe again is not included. Stating that there are other portions relating to VMTs in different areas does not suffice for determining the increase to VMT in the Lake Tahoe Basin. There needs to be a clarification in the FEIS for the above discrepancy and the inclusion of a VMT assessment to the Lake Tahoe Basin.

c. There Should be Details as to how Air Quality, Greenhouse Gas Emissions, and Water Quality Could be impacted with Increased VMT

With insufficient data presented as it relates to traffic and VMT for the Lake Tahoe Basin the DEIR lacks an overall assessment to the cumulative impacts to air quality, greenhouse gas emissions, and water quality. The Specific Plan will likely increase traffic and congestion to Lake Tahoe (specifically the North Shore). To what degree is not known because these consequences were never assessed as discussed above. The Air Quality, Greenhouse Gas and Climate Change, and Water Quality chapters of the DEIR do not mention potential impacts to Lake Tahoe. Once an appropriate traffic analysis is completed for Lake Tahoe, the FEIR must also determine cumulative impacts to all of these things as they relate to vehicle use.

d. The Specific Plan Project Applicant Should Provide Transit Services to Lake Tahoe Basin to Mitigate Traffic Impacts to Lake Tahoe

The project applicant should include transit services to Lake Tahoe as part of the Specific Plan. For reasons already discussed the DEIR does not properly assess traffic impacts to the Lake Tahoe Basin. The FEIR should include an analysis and mitigation measures to traffic impacts. A significant mitigation measure to traffic impacts is providing transit service from the project area to the Lake Tahoe Basin. There will be a transit center and shuttling options within the Village Area, but not for the Lake Tahoe region. The DEIR states that the *Night Rider* and *North Tahoe-Truckee Free Ski Shuttle* are options for transit to the Specific Plan. These only operate at night and weekends and holidays. They also require pickup coordination.⁵ These two forms of transportation cannot suffice as transit options to the Specific Plan from Lake Tahoe.

The DEIR also states as part of the proposed transportation management, "As demand dictates during the peak ski season, transit service provided by TART [Tahoe Area Regional Transportation] and other providers to the Truckee/North Tahoe region would also be provided, promoted, and/or supported."⁶ Riders often complain about public transportation in Lake Tahoe as it is often confusing and unreliable. This "element" is insufficient to mitigate the traffic impacts to the region. The massive development will logically increase the amount of visitors and residents to the Specific Plan area. However, it is also logical to assume that this will also increase the amount of trips to neighboring Lake Tahoe. There must be different transportation alternatives to Lake Tahoe. The project applicant should provide a regular transit service from the Specific Plan to the Lake Tahoe Basin to offset increase individual vehicle use.

⁵ Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Traffic and Circulation. p.9-24.

⁶ Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Traffic and Circulation. p.9-36.

2. Lack of Overall Assessment of Visual and Scenic Cumulative Impacts to the Lake Tahoe Basin

The DEIR lacks an overall assessment of visual and scenic impacts of the Specific Plan to the Lake Tahoe Basin. While it is geographically located outside of the region the massive development project will likely be seen from Lake Tahoe. The Visual Resources chapter ignores a visual or scenic assessment from anywhere not immediately located next to the project area. The development will likely be seen during the day, but even more so at night and when surrounded by snow. TRPA has stringent scenic standards for projects within the Basin. Chapter 37 of TRPA Code require strict height requirements. The RPU and Code also protect nighttime skies through Area Plans by requiring, "...in determining the light for a project, the following should be required...Exterior lighting should be minimized to protect dark sky views, yet adequate for public safety...exterior lighting should utilize cutoff shields that extend below the lighting element to minimize light pollution and stray light."⁷

While the Specific Plan does not fall under the jurisdiction of TRPA these requirements should not be ignored. The FEIR must include visual impacts (particularly nighttime pollution) to Lake Tahoe as well as appropriate mitigation measures. The TRPA Code provides requirements to help achieve scenic protections to the Lake.

3. The Reduced Density Alternative Should be Assessed for Financial Feasibility and Considered as a Serious Alternative

The Reduced Density Alternative is listed as an environmentally superior alternative and should be assessed for financial feasibility to be considered as a serious alternative. This alternative would still have significant and unavoidable impacts, but would reduce the overall size of the project by approximately 50 percent.⁸ The DEIR states, "...the 50 percent reduction was based on a rough conceptual estimate of the minimum amount of development reduction required to reduce traffic volumes sufficiently to have no significant traffic impacts."⁹ Logically, this would reduce any traffic impacts to the Lake Tahoe Basin and likely any scenic impacts. However, the DEIR also states, "However this alternative would not meet several project objectives and its financial feasibility is not known."¹⁰ An economic analysis should be conducted to determine if this alternative is financial feasible. This alternative would likely resolve most of the concerns of the League and dramatically decrease environmental impacts associated with the Specific Plan.

⁷ TRPA Code of Ordinances. December 12, 2012/Amended July 23, 2014. 13.5.3.F.5.a&b. p13-8.

⁸ Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Alternatives. p.17.25.

⁹ Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Alternatives. p.17.25.

¹⁰ Draft Environmental Impact Report Village at Squaw Valley Specific Plan. May 2015. Prepared for Placer County by Ascent Environmental. Alternatives. p.17.45.

Recommendations

The Lake Tahoe Basin is a delicate ecosystem that has been completely ignored through the Specific Plan environmental review process. While the project itself may lie outside of the Basin, its associated impacts cannot be ignored. The League recommends the FEIR include the following:

- **All cumulative traffic impacts to the Basin must be analyzed;**
- **There must be coordination with the Fanny Bridge project;**
- **All environmental impacts to the Basin related to traffic including air quality, greenhouse gas emissions, and water quality need to be assessed;**
- **All cumulative scenic impacts to the Basin must be analyzed;**
- **The economic feasibility of the Reduced Density Alternative should be assessed for this alternative to be seriously considered.**

Sincerely,
Shannon Eckmeyer
Policy Analyst
League to Save Lake Tahoe