



mountain area preservation
ESTABLISHED IN 1987

MAP MISSION:

Our mission is to preserve the Truckee region's community character and the natural environment for present and future generations.

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A grass-roots environmental advocacy non-profit working since 1987

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July 17th, 2015

Attn: Ms. Maywan Krach
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Dear Ms. Krach,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Squaw Valley Specific Plan. Mountain Area Preservation (MAP) would like to submit the following comments for the public record regarding the adequacy of the Squaw Valley Specific Plan DEIR. MAP is an environmental advocacy non-profit organization established in 1987, based in Truckee. Our mission is to *preserve the Truckee region's community character and natural environment for present and future generations.*

MAP was founded twenty-eight years ago to be a local voice for the protection of our unique environment here in the Truckee region. We have advocated since our inception for the protection of open space and sound land use planning/policy. The current Squaw Valley Specific Plan is a programmatic EIR, which gives the community and environment no assurances as to what exactly will be developed, when it will occur and the associated impacts the project will bring to the region and environment. We feel the scale of the proposal will have lasting impacts on Squaw Valley's existing community character, the valley's precious natural resources, regional roadways and severe cumulative impacts to the Truckee and North Lake Tahoe communities. The DEIR has identified numerous significant and unavoidable impacts, which will warrant additional analysis, adequate mitigation measures and/or potential project reductions in order to comply with CEQA and the Placer County General Plan.

The EIR is the heart of CEQA. It is an environmental alarm bell, to alert the public and responsible stakeholders and officials to environmental changes before they have reached ecological points of no return. The EIR is intended to demonstrate apprehensive citizenry that the agency has in fact analyzed and considered all of the ecological implications of its actions. MAP has reviewed the Squaw Valley Specific Plan and

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pertinent sections of the DEIR. We have found the following sections to have inadequate or missing analysis; Workforce Housing, Transportation and Circulation, Hydrology and Water Quality, Greenhouse Gases and Project Alternatives. Please accept our following comments in regard to the adequacy of the DEIR.

Population, Employment and Housing: The Specific Plan and DEIR does not adequately mitigate impacts associated with employee/workforce housing.

- **The Squaw Valley Specific Plan fails to sufficiently propose adequate development of workforce housing for the proposed development project.** The DEIR states 574 new employees will be created annually with the anticipated development proposal, the project will be removing 99 existing units and the county requires at a minimum 50% of FTE to be housed on site (DEIR pg. 5-12). The East Parcel development will only house 300 employees, which does not meet the requirement for the Placer County General Plan with the demolition of the current employee housing, this is a significant impact. Deferring mitigation to a later date to identify off-site housing locations or paying an in-lieu fee to Placer County is not acceptable. The project applicant should go above Placer County's requirement and provide enough housing for all 574 employees created through the projected development project. Creating housing for 100% of the employee base will help to mitigate traffic and greenhouse gas emission impacts for the region, and create the needed employee infrastructure a year-round resort should be required to implement.
- **Mitigation Measure 5-3 will not lessen the employee/workforce impact to less than significant.** The Squaw Valley Specific Plan East Parcel dwelling will only accommodate less than 30% of new employees; Placer County requires a minimum of 50% FTE to be housed on the project site. The proposed VSVSP Employee/Workforce Housing Plan will likely push the employee housing burden onto adjacent communities such as Truckee and North Lake Tahoe, which currently have a very limited stock of affordable or market rate rentals available for the local workforce. Not only is there virtually zero affordable housing units in the North Lake Tahoe region, affordable housing developments such as Henness Flats, Frishman Hollow and Domus have long waiting lists. The surrounding Truckee and North Lake Tahoe community is dealing with a workforce-housing crisis. Placing the impact on



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the surrounding region or through the payment of in-lieu fees to Placer County will not adequately lessen the impact; it will only further exacerbate the issue outside of Squaw Valley. The project applicant should plan to house all 574 new employees within the proposed project site, and create additional housing strategies to fully mitigate the impact of the proposed project.

- **The creation of VSVSP Employee/Workforce Housing Plan at a later date is unacceptable (DEIR pg. 5-13).** A housing plan should be a created concurrently with the project submittal and the Specific Plan, in order fully understand proposed housing solutions, while concurrently being analyzed under CEQA. Additionally the use of in-lieu fees ultimately lacks transparency as to where Placer County plans to utilize the funds. Housing strategies need to be in place in order to minimize the impacts of the proposed Specific Plan, especially if fees are to be collected for future employee housing development.
- **The DEIR fails to analyze the cumulative impact of placing workforce housing off-site to the Town of Truckee or the North Lake Tahoe region.** The DEIR contains zero analysis of the associated impacts of building off-site employee housing for the proposed development. The DEIR needs to be revised to include potential off-site housing locations and analyze the associated impacts to the environment with potential locations.

Transportation & Circulation: The Squaw Valley Specific Plan DEIR identifies numerous significant and unavoidable impacts in regard to the projects anticipated traffic and circulation impacts.

- **Circulation and Parking Policies for proposed project allow for an unacceptable Level of Service, LOS F.** The Squaw Valley Specific Plan Circulation and Parking Goal, CP-1 (SP, pg 5-2) differs from DEIR verbiage, pledging a LOS F as acceptable for the project area (DEIR pg. 9-33). DEIR states, "improvements, necessary to achieve the adopted LOS would create capacity that was un-needed during the majority of the year," (DEIR pg. 9-33). While Placer County allows a LOS F for resort areas with seasonal atypical traffic conditions, the project will create 25 years of phased construction, creating grid lock in the valley and surrounding roadways. A LOS F will create hazardous road conditions for a project area where there is only one road segment into the valley and a full-time housing population. Allowing LOS F is unacceptable, considering the



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impact to the surrounding areas of Truckee and Tahoe City with this policy allowance. The DEIR needs to be re-circulated and identify mitigation measures to address the level of service. Placer County cannot allow un-safe road conditions for the regional community and environment.

- **Adverse impacts to Caltrans intersections, creating cumulative impacts to Truckee and Tahoe City.** The DEIR concludes that the proposed project will result in unacceptable roadway operations and impacts to Caltrans Highways, (Impact 9-5, DEIR page. 9-63). The following segments of the highway will have a significant impact between Deerfield Drive and West River Street and State Route 28 east of State Route 89 in Tahoe City. The DEIR includes Mitigation Measure 9-5: Improve operations on select segments of SR 89 and SR 28, proposing a 4-lane widening project, yet the project plans do not currently include this mitigation as a part of the planning documents or fee programs. The DEIR claims this is an unavoidable and significant impact. The project applicant and Placer County need to revise and re-circulate the DEIR to include a feasible mitigation measure to address this impact. Claiming the impact is unavoidable is not acceptable for the surrounding communities and roadway safety.
- **Construction impacts would be significant and the DEIR is missing analysis.** The DEIR states “the Specific Plan will be developed over an estimated 25-year build out period, with construction proposed to begin as early as spring of 2016. Construction activities are anticipated to require up to an estimated total of 136 construction workers during the most intense time of year for construction,” (DEIR pg. 9-66). While Mitigation Measure 9-8 concludes the Construction Traffic Management Plan (CTMP) will reduce the impacts to less than significant the DEIR fails to analyze additional impacts with 136 construction worker vehicle trips. The DEIR claims it would be “speculative to conduct any type of quantitative analysis,” to address additional construction impacts. The DEIR needs to be revised to include this analysis in order to fully understand all potential project related impacts associated with construction.
- **DEIR fails to analyze project impacts to Interstate-80.** Exhibit 9-10 of the DEIR examines project only trips, yet fails to analyze impacts to Interstate-80. Other regional development projects analyze impacts to I-80, as the interstate is primarily used for project related transit (i.e. construction materials and

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employees). The Squaw Valley Specific Plan has determined development will occur for 25 years, the project will likely create adverse traffic impacts to I-80, the DEIR needs to be revised and re-circulated to include analysis of I-80 impacts and proposed mitigation.

Hydrology & Water Quality: The Squaw Valley Specific Plan DEIR includes extensive analysis and references to the Water Supply Assessment (WSA), which underestimates impacts to the local watershed.

- **The DEIR overestimates the annual precipitation on the surrounding mountains, which could create incorrect analysis in the watershed modeling.** The DEIR states “the average total annual precipitation on the valley floor is 47 inches, while the average for surrounding mountains is 263 inches,”(expressed as snow water equivalent, inches of both water and rain, including snow melt), Exhibit 13-4, DEIR pg. 13-7, also shown in WSA in Table 3-1. Climate Data. The DEIR refers to 263 inches per year which is a figure taken from the WSA. This is a very high amount of precipitation for the area, as well as using a 1:10 ratio that is not applicable to the Sierra Nevada region. The analysis should have looked at the actual SNOTEL numbers, which estimates the average inches of precipitation with a bulk catch sensor that will gauge both rain and snow. The annual average precipitation for Squaw was shown to be 80.6 inches per year from 1993-2011. With the analysis and models using an annual precipitation of 263 inches per year (DEIR pg. 13-7) the impacts of the proposed project have been greatly diminished by not using the factual amount of precipitation for the valley. This in turn creates room for error in the hydrologic models and does not adequately analyze the impacts associated with the proposed development to the local watershed. By not using the correct amount of precipitation, the recharge estimate for the project is also flawed. The DEIR needs to be revised and re-circulated to include the correct analysis for the watershed recharge and associated impacts with the proposed development.
- **DEIR fails to look at aquifer drawdown with expected demand for the proposed project.** In order to understand the aquifer demand for the proposed project the DEIR should include analysis of the aquifer drawdown, by looking at the proposed land uses and ground water saturation at during different time frames of the year. The DEIR includes exhibits



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illustrating the Groundwater Elevation in Existing Wells: 1992-2011 (Exhibit 13-8) and the Percent of Saturation in Existing Wells: 1992-2011 (Exhibit 13-9), yet there is no drawdown map. The DEIR should be revised and re-circulated to include drawdown analysis. This is imperative considering the SVPSD is looking to create a redundant water source utilizing the Martis Valley aquifer, which will adversely create impacts in Martis Valley to only further development in Squaw Valley.

- **DEIR fails to analyze impacts to the Truckee River Watershed.** The DEIR recognizes the restoration efforts to restore Squaw Creek as a part of the proposed Specific Plan, yet fails to analyze associated impacts the development may have on the Truckee River watershed. The DEIR should analyze potential impacts to the Truckee River, considering Squaw Creek is a tributary to the watershed.

Greenhouse Gases & Climate Change: The Squaw Valley Specific Plan as proposed will yield greenhouse gas emissions that exceed the operational standards of 1,100 metric tons of CO2 per year. The DEIR states operational emissions at full build out will yield 45,403 metric tons of CO2 per year, which clearly exceeds the current threshold, yet the DEIR analysis justifies it will be less than significant with the PCAPCD threshold for 2020. Utilizing assumptions on future project GHG emissions with standards in the unforeseen future is appalling analysis for a project of this scale. Placer County has yet to adopt a Climate Action Plan (CAP). Future development in the county, including Squaw Valley should adopt a standard, create local initiatives and craft emission reduction benchmarks in order to make sizable land use decisions. Deferring analysis to 2020 or beyond when new state regulations are applied is inadequate; a CAP should be created in conjunction with the project application.

- **Mitigation Measure 16-2: Implement ongoing operational greenhouse gas review and reduction program, defers project mitigation to 2020.** This is inadequate mitigation, the DEIR needs to provide additional mitigation to address climate impacts with the proposed Specific Plan.
- **The DEIR fails to identify project alternatives to reduce the GHG emissions that are forecasted for operational emissions.** Current GHG emissions for operations from 2010-2013 generated a maximum of 13,765 metric tons of CO2 (DEIR pg. 16-3). While Squaw has taken some steps to reduce their emissions, the DEIR should identify initiatives for GHG



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reduction within the development plans. We cannot continue ignoring the changing climate of the Truckee-Tahoe region and neither should future development proposals in the area.

Project Alternatives: The DEIR analyzed six project alternatives for the Squaw Valley Specific Plan, finding the environmentally superior alternative to be the **Reduced Density Alternative 17.3.4**, which would reduce all Specific Plan project components by 50%. (i.e. units, rooms, retail/restaurant square footage and full time employees) (DEIR pg. 17-24). By reducing the development potential by half many of the environmental impacts MAP has commented on will be minimized to a less than significant finding for CEQA. The DEIR references important environmental benefits with the Reduced Density Alternative such as buildings height reductions, a smaller Mountain Adventure Camp utilizing less water and a diminished construction timeline from 25 years to 15 years. The alternative would also require a master plan process, which would help to avoid piecemeal planning, while creating a unified plan and assurances for the surrounding community. The DEIR states the alternative would not meet all project goals (DEIR pg. 17-25), yet under CEQA fiscal analysis is not analyzed. Placer County and the project applicant should conduct an economic analysis for the Reduced Density Alternative in order to determine if the project alternative would be financially feasible. Considering the proposed Specific Plan and the numerous unavoidable impacts associated with the plan, we urge the applicant and county to seriously consider this alternative.

Placer County General Plan Policy 1.G.1

The Placer County General Plan Policy 1.G.1 states it will *support the expansion of existing winter ski and snow play areas where circulation and transportation system capacity can accommodate such expansions or new uses and where environmental impacts can be adequately mitigated*. The DEIR has referenced ample significant and unavoidable impacts related to the proposed Squaw Valley Specific Plan. In order to stay consistent with county policy it is imperative that future development in Squaw Valley be tailored to fit the valley and its environmental constraints. The impacts outlined in the DEIR to traffic, public safety, water quality, scenic resources and our changing climate are too grave to be ignored for capital gain. We feel the SVGPLUO vision to “ensure that Squaw Valley is developed into a top quality, year-round, destination resort,” “without adversely impacting the unique aesthetic and environmental assets of Squaw Valley,” (Placer County 1983:4) can still be met by reducing the scale of the proposed



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project. Squaw Valley Real Estate, LLC is capable of redeveloping the resort in a sensitive manner in order to protect the local environment and quality of life in the valley.

On behalf of the Board and Staff of Mountain Area Preservation we are truly appreciative for the opportunity to review and comment on the proposed Squaw Valley Specific Plan and DEIR. We recognize Squaw Valley Real Estate, LLC has project objectives and fiscal goals tied to the Specific Plan, but environmental protection of the valley and the surrounding communities needs to be at the heart of any future development proposal. MAP believes there can be a balance of development and environmental stewardship, by utilizing smart growth principles, working with the community and protecting our scenic vistas and natural resources for present and future generations. We are committed to ensuring the Truckee-Tahoe region remains beautiful, by preserving the community character of our unique mountain towns and protecting our vibrant natural resources. We are happy to follow up on our comments and concerns with the project applicant and Placer County if needed.

Please contact our office at 530-582-6751 or by email Alexis@mapf.org if you have questions or need clarification on our comments. Thank you again for taking our comments and review into consideration for the Squaw Valley Specific Plan and DEIR.

Sincerely,

Alexis Ollar, MS & GISP
MAP Executive Director