The MRF is located on property owned by Placer County and the County contracts with Eastern Regional Sanitary Landfill, Inc. (ERSL) to conduct the day-to-day operations and maintenance of the Facility.

The MRF receives, separates, processes and markets recyclable materials removed from the waste stream. The facility is permitted to receive 800 tons of material per day, and 832 vehicles per day, and is operated subject to a Solid Waste Facility Permit under the jurisdiction of the Department of Resources, Recycling, and Recovery (CalRecycle). Residual waste is delivered to the Lockwood Landfill in Nevada for ultimate disposal.

The MRF includes a buy-back facility, where source-separated recyclables from residents and commercial recyclers are accepted, and a permanent Household Hazardous Waste Facility, located next to the MRF. TTSD also provides "blue bag" curbside recycling service to residents. Recyclables can be placed in a blue bag and collected with the regular garbage on collection day. TTSD also offers separate mixed paper and cardboard recycling to businesses and beverage container recycling to restaurants upon request.

Thank you for the opportunity to respond. Please feel free to call me at (530) 886-4965 should you have any questions.

PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Ken Grehm, Executive Director
Brian Keating, District Engineer
Andrew Darrow, Development Coordinator

November 9, 2012

Maywan Krach
Placer County
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

RE: Village at Squaw Valley Specific Plan and Phase 1 Project / NOP of a Draft EIR

Maywan:

Regarding the preparation of a Draft EIR for the subject project we have the following comments.

Both the proposed Village at Squaw Valley Specific Plan and Phase 1 Project have the potential to create the following impacts:

a.) Increases in peak flow runoff downstream of the project site.

b.) Overloading of the actual or designed capacity of existing stormwater and flood-carrying facilities.

c.) The alteration of 100-year floodplain boundaries.

Future EIRs must specifically quantify the incremental effects of each of the above impacts due to the subject project and propose mitigation measures if necessary.

Please call me at (530) 745-7541 if you have any questions regarding these comments.

Andrew Darrow, P.E., CFM
Development Coordinator

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Placer County Museums Division

101 Maple Street, Auburn CA 95603

Tel (530) 889-6500 ♦ Fax (530) 889-6510

CDRA PROJECT REVIEW

Squaw Valley Specific Plan Phase I Project

I have read through the materials provided for the Squaw Valley Specific Plan Phase I project. I will reserve my comments on the project until after the Draft EIR has been completed and I have read through it.

If you have any questions or need further information please feel free to contact me at:

530-889-6502 or rgibson@placer.ca.gov

SQUAW VALLEY MUTUAL WATER COMPANY

P.O. Box 2276
Olympic Valley, CA 96146
Phone: (530) 583-3674 www.SVMWC.com Fax: (530) 583-1257

Maywan Krach
Environmental Coordination Services
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

November 8, 2012

Dear Ms. Krach:

The Squaw Valley Mutual Water Company ("SVMWC") received a copy of the notice of preparation ("NOP") of a draft environmental impact report ("EIR") for the proposed Village at Squaw Valley Specific Plan and Phase I Project ("project"). SVMWC provides the following comments to highlight issues that SVMWC believes the EIR must address during this California Environmental Quality Act ("CEQA") review process. SVMWC's concerns fall into five principal categories, as elaborated below: (1) hydrological studies; (2) water usage patterns and projections; (3) water sources; (4) water rights; and (5) cumulative impacts.

Regarding hydrological studies, SVMWC urges Placer County ("county") to outline early in the EIR process the analyses that the county and project proponent will complete to provide sufficient background information for determining the project's impacts on water resources. These studies should include consideration of the following concerns:

- Overall supply capacity of Squaw Valley's groundwater basin and surface water bodies and seasonal variations in that capacity;
- Determination of the sustainable yield of Squaw Valley's groundwater basin, and margins of safety to avoid groundwater depletion in multiple dry year scenarios
- Status of underground storage tanks and migration of subterranean pollution plumes through the basin;
- Location of any proposed new pump(s) that the project proponent will construct as a condition of developing the location of SVMWC's current pumping stations and; determination of the feasibility of utilizing these proposed pump relocation sites (including the maintenance of water quantity, quality and reliability and the obtainment and location of easements for pipelines to connect to SVMWC's existing system);
- Maintenance and potential enhancement of the flow rates in Squaw Creek, including an examination of creek sinuosity and its impact on the supply capacity and sustainability of the groundwater basin.

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- Impacts of climate change on the availability of water, in both temporal and quantitative terms; and
- Integration of the Todd Engineering report with the results of ongoing hydrological studies, such as the joint University of Nevada, Reno and Lawrence Livermore National Laboratory's investigations.

Regarding water usage patterns and projections, the EIR must analyze and disclose the following:

- Current water usage in the basin, disaggregated by user and time of use;
- Overall anticipated water usage of the proposed project in its various stages of completion, including consideration of any fluctuations in use due to expected seasonal variations and specifically in multiple dry years;
- Comparison between current water usage and projected usage after project completion;
- Storage mechanisms (and their environmental impacts) to level out variability and differences in demand and supply; and
- Enforceable means to make the resort's operations maximally water-efficient.

Regarding water sources, SVMWC believes that the EIR must examine the following aspects of the project:

- Locations and sources inside or outside Squaw Valley from which the project will draw its supply;
- The quantity of water that the project will draw from each of these locations and sources;
- Required measures that will take effect if any of the anticipated water sources lacks sufficient supply for the resort's needs; and
- Accommodation of fluctuations and increased variability in supply that are likely to result from climate change-driven alterations in the availability of water in California, particularly in the Sierra Nevada as snowpack decreases over time and hydrographs change in both the timing and amount of flows.

Regarding water rights, the EIR must consider the superiority of existing Squaw Valley water users' rights vis-à-vis any new users. The EIR must, therefore, examine how the project proponent will ensure respect for existing users' water rights, including the rights of SVMWC, in times of water shortage. Any such shortages in supply should not be shared pro rata with all basin users; the superior rights of SVMWC and other users must be satisfied in full before new users receive any portion of the available supply within Squaw Valley. The EIR must identify measures to ensure respect for these superior rights and must contain

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contingency plans that the project will implement when the available supply is insufficient for all users. The county should also, to the extent possible, quantify water rights in the basin to understand the scope of senior users' rights.

Regarding cumulative impacts, the EIR must investigate other planned development projects in Squaw Valley to determine whether impacts to water resources will be cumulatively significant in light of these other projects. The county should identify the likely scale of any such anticipated developments and analyze whether the available water resources can accommodate them. Any insufficiency should result in additional mitigation measures to be implemented by the project proponent.

The abovementioned issues reflect SVMWC's concerns about the massive scale of the proposed project and its impacts on Squaw Valley's water resources. SVMWC believes that the CEQA process will provide a vehicle for analysis of these various concerns, and SVMWC looks forward to engaging in this process to help produce an EIR that will address the needs and rights of existing Squaw Valley residents and water users while also protecting Squaw Valley's environment and appropriately accommodating new users.

Thank you for your attention to these issues.

Sincerely,

Tim Mattheis – Board member, SVMWC
For:

John Johnson
President, SVMWC

SQUAW VALLEY
PUBLIC SERVICE DISTRICT

SQUAW VALLEY FIRE DEPARTMENT

November 9, 2012

County of Placer
Community Development Resource Agency
Planning Services Division
attn: Alex Fisch, Associate Planner
3091 County Center Drive, Suite 140
Auburn, CA 95603

RE: Village at Squaw Valley Specific Plan Project NOP Scoping Comments

Dear Alex,

The District reviewed the Notice of Preparation of a Draft Environmental Impact Report for the proposed Village at Squaw Valley Specific Plan and Phase 1 Project dated October 10, 2012, as well as the Initial Study for the project. Thank you for the opportunity to comment on the proposed project's potential environmental impacts.

As you know, the District provides fire protection and advanced life support, drinking water, sewer collection, and garbage collection services for the community in Olympic Valley and along the Truckee River corridor. The proposed project will require significant analyses to determine its impacts to the District's levels of services and the necessary mitigations to address them.

A significant consideration specific to the project's phasing and the analyses required to determine environmental impacts is the construction of water supply assets, public service facilities, and infrastructure improvements required to serve the entire project. Improvements to the District's existing systems as well as new infrastructure necessary to provide capacity required to serve the entire project are expected to be constructed prior to, or concurrent with, construction of Phase 1. This approach is in lieu of constructing improvements only when the demand of a specific phase triggers them so the District and the community are protected from risks associated with changes in the project's ownership, scope or schedule. It is anticipated that the Development Agreement between the developer and District will better define the scope and schedule of the delivery of water supply solutions and construction of improvements.

Fire and Emergency Medical Services

The significant increase in residential volume and commercial services resulting from the project may require additional facilities and equipment to maintain current levels of service, including construction of a second fire station, procurement of an **aerial apparatus** and a **small rescue vehicle** and development of **ambulance** transport capability. The anticipated increase in emergency call volume and predictable increase in simultaneous or overlapping calls for service will trigger the need for **additional staff**, which may necessitate gap-funding to bridge between the staffing impact and realization of the incremental increase in ad valorem tax revenue.

A **new fire station** including living quarters and a training facility should be included in the scope of the project with consideration given to land acquisition, permitting, and zoning necessary to construct it.

An emergency vehicle access **(EVA) inside the valley** should be analyzed to improve emergency access to and from the proposed project. Although there may be more than one alternative, connecting Squaw Creek Road to Far East Road in the Village with or without a connection to Juniper Mountain Road in Alpine Meadows would improve emergency preparedness.

Emergency access on Hwy 89 to and from Squaw Valley, when impacted by heavy traffic from skiers, summer guests, or bad weather, should also be analyzed. A bike trail between Squaw Valley and Truckee (see below) could be constructed to accommodate such an EVA.

Water

In consideration of the District's existing water system infrastructure, there is **inadequate water supply** to serve the project. Additional water supply will be necessary to serve the project as proposed.

The project applicant is modeling, investigating, and evaluating the groundwater resources of the aquifer but it remains uncertain that there is adequate supply available in the aquifer to serve the project.

The **location of the project**, although on private property, almost completely **overlies the portion of the aquifer** known to produce the highest quantity and best quality water. It is from this portion of the aquifer that the District's entire service area is served its current potable water supply. To date, the only area being explored for additional water supplies necessary to serve the project has been constrained to this portion of the aquifer as well.

Dense development of the land overlying the aquifer poses unique risks to the District's ability to **access the aquifer** to rehabilitate and replace existing and proposed production wells. It also significantly reduces access to the aquifer to explore for additional water supply to meet future demands. The project should include a plan and dedicated areas to allow for replacement and rehabilitation of wells, along with areas dedicated to access the aquifer to develop future water supplies.

The District is extremely concerned that the proposed water supply sources will result in a water supply framework that lacks **geographic diversity and redundancy**. Diversity in water supply sources provides necessary redundancy that will allow the District to continue to provide potable water service to its existing, proposed, and future customers if the single supply source is jeopardized by unforeseeable changes in the aquifer's production or its water quality. Investigations into, and evaluations of, alternative water supply solutions are necessary. They may include options identified by the District in the *2003 Squaw Valley Groundwater Development & Utilization Feasibility Study Update* or the *2009 Alternative / Supplemental Water Supply and Enhanced Utilities Feasibility Study*. **Alternative water supply solutions** will likely require further environmental analyses.

A **utility corridor along the Truckee River** between Squaw Valley and Truckee will significantly benefit the community by providing a much needed redundant water supply, natural gas, fiber optic, bike trail access, and EVA. Placer County has initiated work on this project and should consider an expansion of scope to include the utility corridor, bike trail, and EVA.

All **new wells** must meet construction, performance and water quality standards set forth by the District as well as those of the California Department of Public Health (DPH). The locations of all new wells should be located such that they do not influence the production of other wells or flows in Squaw Creek. The District is currently pursuing funding for Phase II of the Creek Aquifer Interaction Study, which will analyze data collected in Phase I to provide quantitative information on the hydrological relationship of pumping in the aquifer and flows in Squaw Creek, including the trapezoidal channel.

The water budget for **snowmaking** operations at the ski resort is largely unknown while its demand and supply may influence the water budget being considered for potable supply in the valley, including the proposed project. It is recommended that the existing and future supply and demand for snowmaking operations be evaluated to determine its impacts on the District's ability to ensure long term water supply solutions.

Water supply sources proposed to serve the project, and satisfy California Senate Bills 610 and 221, may require treatment to meet water quality standards required by the USEPA and DPH. A new **Water Treatment Plant** (WTP) should be included in the scope of the project with consideration given to land acquisition, permitting, and zoning necessary to construct it.

The impacts of the project's water demand on the District's distribution system are being evaluated primarily through hydraulic modeling. Other **infrastructure improvements** will be necessary to serve the proposed project at the same level of service currently provided and they include, but are not limited to production wells, water storage tanks, pressure-reducing vaults, and underground pipe.

The impact of underground parking garages on the **aquifer's potable water storage** should be analyzed.

There are known **contamination sites** in the aquifer resulting from leaking underground storage tanks; our understanding is that the tanks have been removed and the sites mitigated and closed-out by regulatory agencies having relevant jurisdiction. However, if contamination plumes remain, the locations of new wells need to be strategically located to avoid migration of contaminants.

Water quality in the District's system may be influenced by **stormwater quality** as well as accidental releases of **hazardous materials**, some of which are scheduled to be housed in the relocated Red Dog Maintenance facility.

Sewer

The impacts of the project's wastewater generation flows on the District's collection system are being evaluated through hydraulic modeling as well. Infrastructure improvements to increase **capacity in the collection system** will be necessary to serve the proposed project at the same level of service currently provided and they include, but are not limited to, the installation of sewer manholes and underground pipe.

Of particular concern is the District's sewer **siphon line** crossing under the Truckee River. Current modeling results, with the proposed project's sewer flows included, indicate that this section of the District's sewer main is over-capacity. This line will require replacement or the installation of a parallel, redundant sewer main. The environmental impacts of installing a sewer line under the Truckee River should be analyzed.

The Tahoe Truckee Sanitation Agency (TTSA) is the agency responsible for conveying wastewater collected from the District's system to its treatment facilities in Truckee and owns and operates the wastewater treatment facility. Analyses of the capacities in their trunk line and treatment facility should be included in the scope of the EIR.

Water and Sewer

The District's **corporation yard** requires expansion to serve the project. A new corporation yard, or expansion and consolidation of the existing corporation yards, should be included in the scope of the project with consideration given to land acquisition, permitting, and zoning necessary to construct it. As our system operators live further from work due to the high cost of living and lack of affordable housing locally, analyses of proposed infrastructure and systems are required to determine if on-site **overnight accommodations** are necessary to improve the District's emergency response.

The increase in demand on the District's water and sewer systems may necessitate the need for additional staffing, equipment, vehicles, and public service facilities.

Garbage

The District contracts with Tahoe Truckee Sierra Disposal (**TTSD**) for the collection of municipal solid waste for all residential properties within its service area. The project applicant plans to contract directly with TTSD for garbage collection, which is typical for commercial accounts in the District.

However, the District does own and operate a **dumpster facility** that serves its customers near the project area. It is an essential facility that allows weekend visitors to dispose of their garbage prior to leaving the valley and helps prevent trash cans being left outside on the curb overnight for pick-up by TTSD. Benefits attributed to maintaining the dumpster site include fewer bear encounters, less litter, and easier snow removal operations. If the site is proposed to be relocated, an alternative site should be included in the scope of the project with consideration given to land acquisition, permitting, and zoning necessary to construct it.

Bike Trail Snow Removal

The District recently began providing snow removal services and wintertime maintenance of Placer County's bike trail in the valley. Feedback from the community indicates that the pilot project is successful and that there is desire for the District to continue the service into perpetuity. As the project proposes to extend the bike trail into the project area, **funding**

mechanisms, **equipment** procurement, and **snow storage easements** will be required to support the District's seasonal program.

Conditions of Service

The District is in the process of preparing a **Water Supply Assessment** (WSA) pursuant to SB 610 and SB 221 that will be subject to approval by the District's Board of Directors. The District is examining the future water demand for a 20-year planning horizon and build-out of the Squaw Valley General Plan and Land Use Ordinance to determine if adequate supply can be provided to meet the intent of the legislation.

The developer will be required to negotiate a **Development Agreement** with the District to identify the conditions of service for the project. It may trigger additional environmental impacts that may be subject to review under CEQA (e.g., construction of water tanks, replacement of sewer mains, and other off-site improvements). Additional Development Agreements may be required for future phases.

Thanks again for the opportunity to provide comment on the Notice of Preparation for the project. If you have any questions or require additional information, please contact me at (530) 583-4692.

Sincerely,

Mike Geary, PE
General Manager

cc: Squaw Valley Public Service District Board of Directors
Pete Bansen, Fire Chief; Squaw Valley Fire Department
Jesse McGraw, Operations Manager; Squaw Valley PSD
Chevis Hosea, Vice-President of Development; Squaw Valley Real Estate

TAHOE-TRUCKEE SANITATION AGENCY
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Erik Henrikson
S. Lane Lewis
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General Manager
Marcia A. Beals

VIA U.S. MAIL AND E-MAIL

9 November 2012

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

RE: Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan and Phase I Project

Dear Ms. Krach:

The Tahoe-Truckee Sanitation Agency (T-TSA) provides the following comments to Placer County on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) for the proposed Village at Squaw Valley Specific Plan and Phase I Project (Project).

T-TSA, which provides regional wastewater treatment and conveyance service to its member entities, owns, operates and maintains the Truckee River Interceptor (TRI), a main trunk line for raw sewage conveyance, and the Tahoe-Truckee Sanitation Agency Water Reclamation Plant (WRP). T-TSA's member entities are the North Tahoe Public Utility District, the Tahoe City Public Utility District, the Alpine Springs County Water District, the Squaw Valley Public Service District (SVPSD), and the Truckee Sanitary District.

The 17-mile long TRI pipeline runs along the Truckee River corridor between Tahoe City and Truckee. The interceptor flows exclusively by gravity and varies in size from 24- to 42-inches in diameter. The interceptor conveys all of the untreated, raw sewage collected from the northern and western shores of Lake Tahoe, as well as from the communities at Alpine Meadows and Squaw Valley.

The WRP regional facility is designed to treat and dispose of the sewage received from the five member districts. Through a series of biological, chemical and physical processes, the wastewater is purified to a degree where surface and ground water quality is protected. Wastewater flow to the facility varies in quantity and quality in proportion to the population present during the year. The WRP is principally sized to treat the maximum sewage flows that occur during peak holiday periods with the large influx of seasonal residents and visitors. The

capacity of the plant is 9.6 million gallons per day (mgd) on a maximum 7-day average flow basis during the summer months.

The NOP recognizes the need to assess potential impacts on the sanitary sewer facilities that would serve the proposed Project. T-TSA has reviewed the NOP and Initial Study, and other available Project information, and has identified a number of potential adverse impacts and concerns that need be addressed and evaluated in the Draft EIR. These impacts and concerns are:

1. The Draft EIR needs to present wastewater flow estimates for the proposed Project while outlining the methodology used to develop them. It needs to evaluate the potential impacts of these flows to the TRI and the WRP.
2. The Draft EIR will need to provide wastewater flow information for all phases of the proposed Project, at build-out, in addition to those generated only by Phase I. The Draft EIR needs to present finalized fixture unit counts and other T-TSA billing factor counts for Phase I and the overall proposed Project. Daily, weekly, monthly, and/or seasonal variations in wastewater flow need to be evaluated such that accurate average and maximum flow rate predictions may be presented. Total estimated flow rates from the entire development will need to be presented, including residential, commercial, recreational, industrial, and all other properties to be developed. Wastewater conveyance and treatment plant and disposal capacity issues associated with the entire Project (Phases I, II, III, and IV) need to be investigated, evaluated and addressed in the Draft EIR. At this time, T-TSA does not have enough information to determine whether it can serve the proposed Project either at a Project-specific level or at a program level.
3. In order to evaluate whether or not the TRI has sufficient unused capacity to serve the proposed Project, a field survey of the entire length of the TRI between its confluence with the Squaw Valley Interceptor (SVI) and the WRP needs to be conducted to establish accurate rim and invert elevations. T-TSA's hydraulic model then would have to be updated with the current survey information and the estimated Project wastewater flows in order to accurately assess the available TRI capacity.
4. Once proposed Project wastewater flow data have been developed, a capacity evaluation of the WRP needs to be performed to determine whether any expansion or upgrade of the treatment and disposal facilities will be required to serve the proposed Project.

In addition to the above comments, T-TSA also would like to correct and clarify statements in the Village at Squaw Valley Specific Plan and Phase I Project Initial Study (Initial Study). The following comments are provided in connection with Section 2.17, Utilities and Service Systems, of the Initial Study:

1. Section 2.17.1: The T-TSA WRP has a capacity of 9.6 mgd on a maximum 7-day average flow basis during the summer months.
2. Section 2.17.2.a:
    a. First paragraph: T-TSA operates under waste discharge requirements (WDRs) issued by the Lahontan Regional Water Quality Control Board and not under a NPDES permit as suggested in the Initial Study. The treated wastewater is discharged to land at the T-TSA facility.

b. Second paragraph: With respect to the first sentence, the Draft EIR needs to evaluate the potential impacts of the proposed Project on the TRI, as the proposed Project would result in an increase in the amount of wastewater that would require conveyance through the TRI.

3. Section 2.17.2.b:
   a. First paragraph: As noted above, T-TSA's wastewater collection facilities, as well as its treatment and disposal facilities, may be impacted by the proposed Project.
   b. Wastewater Collection and Treatment Facilities:
      i. General: Potential impacts to the SVPSD wastewater collection facilities also should be evaluated.
      ii. Third sentence: The T-TSA WRP has a capacity of 9.6 mgd on a maximum 7-day average flow basis during the summer months.
      iii. Fourth sentence: T-TSA does not issue "Will-Serve" letters as suggested in the NOP. Sewer service is provided on a first-come, first-serve basis for all projects within T-TSA's service area.
      iv. Fifth sentence: As previously mentioned, potential impacts to wastewater conveyance facilities need to be evaluated.
4. Section 2.17.2.e:
   a. Second sentence: The T-TSA WRP has a capacity of 9.6 mgd on a maximum 7-day average flow basis during the summer months.
   b. Third sentence: T-TSA does not issue "Will-Serve" letters as suggested in the NOP. All capacity allocations are made on a first-come, first-serve basis for all projects within T-TSA's service area.

T-TSA would like to thank Placer County for the opportunity to provide these comments. We look forward to review how our concerns are addressed in the Draft EIR.

If you have any questions, please do not hesitate to call me at (530) 587-2525.

Sincerely,

Marcia A. Beals
General Manager/Treasurer

Jap:JP

cc: Jay Parker/T-TSA
Tom Rinne/T-TSA

Town Council

Joan deRyk Jones, Mayor

Barbara Green, Vice Mayor

Dr. Mark Brown D.C., Council Member
Carolyn Wallace Dee, Council Member
Richard Anderson, Council Member

Department Heads

Tony Lashbrook, Town Manager
J. Dennis Crabb, Town Attorney
Adam McGill, Chief of Police
John McLaughlin, Community Development Director
Kim Szczurek, Administrative Services Director
Judy Price, Town Clerk
Alex Terrazas, Assistant Town Manager
Daniel Wilkins, Public Works Director/Town Engineer

November 9, 2012

Maywan Krach
Environmental Coordination Services
Community Development Resources Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Notice of Preparation, Village at Squaw Valley Specific Plan and Phase 1 project

Dear Ms. Krach;

Thank you for including the Town of Truckee in your circulation of the Notice of Preparation for the Environmental Impact Report for the Village at Squaw Valley Specific Plan and Phase 1 project. This project is significant, proposing 1300 housing/lodging units and significant support facilities over a 15 year build out. Phase one, proposed for development immediately, proposes nearly 1,000,000 sq. ft. of building area including several hundred housing/lodging units. While this project is large, it is located several miles south of the Town of Truckee so our comments and concerns focus on issues and impacts of regional concern or on potential impacts within the Town of Truckee that may result from the proposed project.

1. Transportation and traffic- A project of the magnitude proposed has the potential to generate substantial traffic during construction and operation. The EIR should address potential traffic impacts in detail. The analysis should address:

   a. Construction trips- the project proposes to replace existing surface parking with underground parking. Construction of underground parking can generate significant excavated material (soil and rock). It is not clear in the project plans if this material will be used somewhere else within the site or necessitate significant "off-haul" of excess material. The EIR should address how much material will be "off-hauled" and where the "off-hauled" material will be transported to. The EIR should quantify the amount of truck traffic associated with the off-haul, the likely route of such traffic and the anticipated traffic, noise and land use impacts that may result from this activity. Other types of construction and material delivery impacts should also be analyzed as well. This analysis should quantify the expected number of construction workers and where they will likely be traveling to and from to work at the site. The EIR should

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analyze the impacts of these additional trips based upon time of year, days of the week and time of day.

b. Operational trips- the region continues to be optimistic that significant tourist and lodging improvements such as those proposed by this project will result in "destination trips" that do not add traffic to peak holiday and weekend periods in the winter and summer. However, to date there has been no evidence that the significant "village" improvements constructed over the last 10 years at Squaw and Northstar have resulted in such a change to visitor patterns. Therefore, this EIR must quantify anticipated vehicular trips associated with use and occupancy of the proposed improvements. Trips analyzed must include visitors, residents, and employees including the background traffic of current and potential expanded capacity of skier days on the mountain and growth in Tahoe City and points east and south. Truckee requests particular focus on SR 89 including its intersections with West River Street, Deerfield Drive, the Interstate 80 ramps and Donner Pass Road. The EIR should also analyze the mainline constraint created by the narrowing of SR 89S at the "Mousehole" (UPRR/89 undercrossing).

   Truckee also requests that the EIR analyze the impacts of the increased traffic on I-80 with particular attention paid to the impact on Donner Pass Road and other Town streets when I-80 is closed due to winter conditions resulting in "gridlock" conditions that spill over onto our streets. These conditions not only make travel within Truckee impossible but also constrain movement of emergency vehicles.

c. Mitigations- Based upon the size and scope of this proposed development, combined with the limitations on developing regional roadway automobile carrying capacity, the Town encourages Placer County to place significant emphasis on upgrades to public transit infrastructure in the form of infrastructure improvements, ongoing operations funding, and transit use incentive programs as a means to mitigate regional traffic impacts associated with this project. The Town also encourages Placer County to place emphasis on requiring the project to fund and/or operate ongoing congestion management programs to mitigate peak period congestion and gridlock conditions along the SR 89 corridor.

In preparation of the traffic analysis, the EIR should recognize the existing Intergovernmental Agreement between Truckee and Placer County regarding cross jurisdictional Traffic Impact Fees. This agreement was entered into in June of 2007. The agreement identifies that the cross jurisdictional traffic impacts associated with traffic growth from new development in the Town and Placer County are roughly equivalent to one another, and as a result the two jurisdictions have agreed to not pursue traffic mitigation fees associated with new development from within each other's jurisdictional boundaries. This agreement was based upon a set of land use and traffic growth assumptions from the year 2005. The agreement also identifies that it should be updated every five years to take into account changes in land use and capital project needs that may be identified over time. Given the significance of this project, the Town requests that the County work in partnership with the Town to update the Cross Jurisdictional Traffic Impact Fee agreement and supporting technical documentation at this time in order to determine whether or not reliance on that agreement will be adequate to avoid significant cumulative impacts by this project on the roadway network within the Town of Truckee.

2. Workforce Housing- The provision of adequate workforce housing has been a high priority for the Town of Truckee and Placer County for well over a decade. Both jurisdictions have developed general plan policies, ordinance requirements and have invested public funds to improve this component of our infrastructure that is critical to supporting a growing resort economy. The initial study attached to the NOP and the draft Specific Plan recite the Placer County General Plan policies that requires that this and similar projects provide half of the housing necessary to accommodate their projected workforce housing demand. We were not able to locate any provision for workforce housing in the project description. Additionally, the project description states that a number of existing workforce housing units will be removed and eliminated by the construction of the proposed project. Finally, as a matter of background it is unclear if any workforce housing units were created to mitigate the workforce housing impact of the original (Intrawest) Squaw Valley Village project as required by the project EIR mitigation measures and project conditions.

   Lacking any information related to this required element of the project, the Town believes that this application is not complete for processing and that the release of the Notice of Preparation is premature. The Town requests that the NOP be recirculated when the proposed specific plan and phase 1 project includes a specific proposal to address this requirement.

   While the Town recognizes that the provision of workforce housing is not always considered an environmental factor that must be evaluated in an EIR there are other factors directly related that are. These include compliance with adopted land use plans and policies, traffic impacts associated with employees commuting long distances due to inadequate housing being available, etc. The Town requests that the EIR address the specific issues associated with the planned workforce housing (once such plans are developed) and further that the EIR evaluate the direct and indirect impacts associated with only ½ of the workforce housing requirement being addressed by this project.

The Town of Truckee sincerely appreciates the ability to review and comment on this important project early in the review process. We are committed to working closely with the County and the project team to clarify and address our concerns and will make key staff available to do so. Should you have any questions or need clarification related to any of our concerns, please contact me at 530.582.2901 or tlashbrook@townoftruckee.com.

Sincerely,

Tony Lashbrook
Town Manager

Cc
Truckee Town Council Members
Nevada County 5th District Supervisor
Placer County 5th District Supervisor
Andy Wirth, GM Squaw Valley USA
North Lake Tahoe Resort Association

To: Alex Fisch, Senior Planner
Placer County Planning Services Division
3091 County Center Drive
Auburn, CA 95603
afisch@placer.ca.gov

From: Alexis Ollar, Executive Director
Mountain Area Preservation
P.O. Box 25
Truckee, CA 96160
Alexis@mapf.org

Planning tomorrow.
Together.

Dear Mr. Fisch,

On behalf of the Board of Directors of Mountain Area Preservation and myself, thank you for taking into consideration the following comments regarding the proposal by Squaw Valley Real Estate, LLC. Mountain Area Preservation was formed in 1987 to advocate for sound land use planning and open space. We are concerned that a project of this scale could have lasting impacts on the unique environmental resources, scenic resources, and community character element of Squaw Valley. We advocate for smart growth and development projects that enhance community character and protect our regions unique natural resources. From a land use and conservation perspective we feel as though the current applicants proposal may be inconsistent with the Squaw Valley General/Community Plan of 1983.

The 1983 Squaw Valley General Plan and Land Use Ordinance states on page 7, "In an ecologically sensitive area such as Squaw Valley, development beyond a certain capacity will damage the recreational and living experience of current and future users." While the 1983 General Plan claims to have struck the right balance of development to conservation; and visitor- oriented development to local residential/community development, it has been nearly 30 years since the General Plan was completed. A project of this scale warrants a full review of the balance of existing and planned development in the Valley with updated goals for the Squaw Valley community. This kind of review is best done in a General Plan update process and not in a piecemeal General Plan amendment process driven by a development project as proposed here in Squaw Valley.

The Notice of Preparation (NOP) as well as the Initial Study (IS) has indicated multiple significant impacts due to the project plans for Phase I. The Environmental Impact Report (EIR) is supposed to analyze the entire project yet the project description for the whole project has not been completed for Phase II through Phase IV. The county should only authorize an environmental review of the project when all phases have been identified in order to analyze cumulative impacts for the proposed development project. The NOP documents also allude to amending the Squaw Valley General Plan without identifying what elements are to be amended in the 1983 plan. Will there be an amendment or just the adoption of the Specific Plan as proposed by the developer for the community? Amendments to the two General Plan documents, the 1983 Squaw Valley General Plan and the 1994 Placer County General Plan (which together comprise the General Plan for the Valley) are part of the project description and any impacts associated with those amendments must be analyzed in the EIR.

The NOP along with the IS has noted potential inconsistencies with the 1983 Squaw Valley General Plan and 1994 Placer County General Plan, the EIR needs to review those and determine feasibility of the proposed land use designations with the current Specific Plan the applicant is proposing. The purpose of the 1983 Squaw Valley General Plan was "intended to guide and direct current and future growth and development consistent with environmental, physical, social and economic constraints" (pg. 2). In the 1983 Squaw Valley General Plan it states "the local community, landowners and potential visitors had all been engaged in determining long term planning objectives" (pg. 2) for Squaw Valley for "at least the next 10 years" (pg. 3). It has been stated multiple times in the MAC meetings that the Squaw Valley community has requested a community plan update and now are faced with a plan that could dictate construction for the next 20 years.

Understanding our changing environment and community in the Sierra region a 30-year-old land use plan could warrant an update, which could be undertaken concurrently with the project process as was done in Martis Valley in 2005. The Governor's Office of Planning and Research (OPR) sends letters to cities and counties alerting them an update may be warranted when their plans have not be revised within the past 8 years. This plan has sailed by that marker. We are curious if Placer County has received such a letter from OPR? If so the EIR should take that into consideration.

In closing the county should consider a General Plan update or at the very least a concurrent General Plan update process with the Project process. This would allow the community to participate in determining the future growth and development of the Valley. This approach seems to us to be the only way that very dated AND missing sections of the General Plan can be comprehensively and consistently brought current. We also urge the County to prepare a complete Project Description for all phases of the project including all necessary amendments to both General Plan documents (1983 and 1994 GPs). This should then be re-circulated so that the "complete" Project Description along with another opportunity for the public and agencies to provide "scoping" comments. Mountain Area Preservation feels without a complete Project Description the EIR cannot be complete.

Thank you for allowing us to submit comments for the NOP and if you have any further questions feel free to contact me.

Thank you,

Alexis Ollar, Executive Director
Mountain Area Preservation
P.O. Box 25
Truckee, CA 96160
530.582.6751

OLYMPIC VILLAGE INN

RECEIVED
NOV 07 2012
ENVIRONMENTAL COORDINATION SERVICES

October 30, 2012

Placer County, Planning Services Division
3091 County Center Drive Auburn, CA 95603

Attention: Maywan Krach, Community Development Technician

SUBJECT: Notice of Preparation of Environmental Impact Report for Village at Squaw Valley Specific Plan and Phase I Project

The Board of Directors (BOD) of the Village Inn Owners Association (VIOA) of the Olympic Village Inn (OVI) timeshare project appreciates the opportunity to comment on the preparation of an Environmental Impact Report (EIR) for the Village at Squaw Valley Specific Plan and Phase I Project. I have been authorized by the VIOA Board of Directors to submit these comments on their behalf.

The BOD supports the topical areas identified for analysis in the EIR as presented in the Notice of Preparation (NOP). We are concerned, though, that the level of analysis for the Specific Plan will not be detailed as the specific plan, itself, only provides for general locations of development and general development parameters. Our concern is enhanced by the fact that the initial specific plan document suggests that once the specific plan is adopted by Placer County, most uses will be allowed by right. Without more detail in the specific plan and without a subsequent review process (such as a conditional use permit) for future phases, impacts on OVI will not be sufficiently evaluated or addressed.

VIOA BOD has been presented an analysis of the draft specific plan and has approved the use of that analysis for the purposes of our comments listed below. That analysis focused on the possible impacts (both positive and negative) on OVI of the proposed development surrounding the timeshare project.

- As noted above, only general uses and densities of uses are identified in the draft specific plan for development areas J, K, L and N.
    - The BOD is concerned about the effect on views currently enjoyed by the owners and guests. Presently, except for the view of the parking area proposed for development in area J (which is presently screened by mature trees), OVI is blessed with outstanding views of the natural backdrop to Squaw Valley. These views contribute to the economic viability of OVI. The BOD would ask that the EIR analyze both the view from OVI for these development areas and from these development areas (to address the privacy of the use of OVI by guests and owners).
    - The VIOA BOD is also extremely concerned about the impact of development proposed for development area N which is west and uphill from OVI. The concern revolves around the effect of drainage from the development on OVI's parking and structures. If underground parking structures are to be incorporated into any development in N, then the impact on intercepting surface and sub-surface water should be evaluated.
    - In addition, the effect of noise from the proposed developments that surround OVI and the traffic impact from the access to these developments is of critical concern to the VIOA BOD. The ambient noise level currently at OVI is very low.
    - The VIOA BOD is generally supportive of the pedestrian/bike access proposed in the specific plan. Nevertheless, as with the traffic issue, the BOD is concerned about the effect on OVI from the unspecified detailed pedestrian/bike path locations proposed in the specific plan. We are also concerned about the access to the U.S. Forest land behind and adjacent to OVI and the proposed development in K, L and N. OVI has long experienced problems with unauthorized persons using OVI parking and OVI property to access the forest lands. An evaluation of the proposed development and the potential for exacerbating this current problem should be part of the EIR.
- As noted earlier, the VIOA BOD is supportive of the topical areas identified in the NOP for the EIR. The issues of utilities are especially of concern to the VIOA BOD. The draft specific plan did not identify the current sewer line that serves OVI. Of more concern are the need for additional water resources and possible new water treatment facility, and the possible need for an expanded wastewater treatment facility. The VIOA BOD's concern is around the financing of these possible resources, new facilities, the maintenance costs for these new facilities and the possible financial impact on OVI.
- Which alternatives in the EIR that will be evaluated were not identified in the NOP. The BOD would like to suggest that one alternative to be evaluated should be no development of areas K, L, N. Another alternative to be considered would be no development of area N, and reduced development potential of K and L that eliminates any commercial potential.
- The VIOA BOD would like the retention of the historic dining hall, commonly referred to as the "Hub", directly east of OVI be incorporated into the EIR.

Again, our thanks for being offered the opportunity to comment on the scoping of the EIR; please contact me with any questions or comments.

On behalf of the Village Inn Owners' Association Board of Directors

Michael A. Harper, FAICP
Member, VIOA BOD

Village Inn Owners' Association
Post Office Box 2395
Olympic Valley, CA 96146
(530) 581-6000

SIERRA WATCH
Sierra Watch
408 Broad Street #12
Nevada City, CA 95959

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

Dear Ms. Krach:

When *Outside Magazine* recently designated Squaw Valley the Best Ski Resort in North America, they were reaffirming something many of us already understood: Squaw Valley is one of the great places in our Sierra Nevada.

As Placer County processes development applications that propose such drastic changes to Squaw, it's important to keep those values at heart. Fortunately, the California Environmental Quality Act establishes a process to carefully assess what the project would mean to Squaw and the surrounding region.

We flag some potential issues in the attached comments to the Notice of Preparation of an Environmental Impact Report for the Village at Squaw Valley Specific Plan.

Sincerely,

Tom

Tom Mooers
Executive Director

SHUTE, MIHALY & WEINBERGER LLP

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LAUREL L. IMPETT, AICP
Urban Planner
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November 9, 2012

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

Re: Village at Squaw Valley Specific Plan Project NOP Scoping Comment

Dear Ms. Krach:

On behalf of Sierra Watch, we thank you for the opportunity to provide comments on the Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Village at Squaw Valley Specific Plan ("Project"). Sierra Watch closely monitors potential land use changes in the Tahoe-Truckee Region and seeks to ensure the protection and preservation of the Sierra's great natural, scenic, and recreational resources. We submit the following comments on the NOP and the associated Initial Study ("IS") for your consideration.

I. The NOP Lacks Necessary Information Regarding the Project and its Probable Environmental Impacts.

The purpose of an NOP is to "solicit guidance from members of the public agencies as to the scope and content of the environmental information to be included in the EIR." California Environmental Quality Act ("CEQA") Guidelines § 15375; *see also* CEQA Guidelines § 15082. In order to effectively solicit such guidance, the NOP must provide adequate and reliable information regarding the nature of the project and its probable environmental impacts. As the following discussion illustrates, the County's NOP does not meet the minimum standard for adequacy in this regard.

A. Project Description and Setting Information

One of CEQA's fundamental requirements is that an EIR contain an accurate and complete project description. *See County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185 (1977); *see also* CEQA Guidelines § 15124. A clear and comprehensive project description is the *sine qua non* for meaningful public review. Without it, the public cannot be assured that the environmental impacts of the entire Project have been considered in the EIR.

To be adequate, an NOP must provide enough information describing the proposed project in sufficient detail to enable members of the public to make a meaningful response to the NOP. CEQA Guidelines § 15082(a)(1)(A)&(B). Unfortunately, the County's NOP and IS fail to meet this basic standard. The IS states that more details are available for the first phase of development (Phase I) than subsequent phases (at 1-16), yet this does not seem to be the case. The Project as described in the NOP and IS lacks sufficient specificity (even for Phase 1) to allow the public to understand specifically what the applicant and County contemplate for the site.

Critical Project components for all phases of development remain undefined. Those aspects of the Project that the IS and NOP attempt to describe are depicted with so little detail that a reader is left with no idea of what the Project will look like at build-out or how it will work. A few of the most egregious deficiencies in the Project Description are set forth below.

- *Total Visitor Use.* The IS explains that the number of visitors under Phase 1 could exceed the number of units because "a portion" of the 2- and 3-bedroom units would be periodically locked off to create individual rooms (keys). IS at I-16, Table 1-4. The EIR must identify the maximum number of visitors that will be accommodated by the residential component of the proposed Project. Moreover, because the Project will also generate day users, the EIR must identify the total number of visitors expected at the Squaw Valley Resort upon build-out. This data should be identified for each facility and by season.

- *Mountain Adventure and Aquatic Center.* The Project includes a Mountain Adventure and Aquatic Center yet this facility is barely described at all. The IS states that the Center would include a summer performance area indicating that this facility could be a venue for concerts and plays. Details relating to the Center must be included in the EIR.

- *Height of Structures.* The IS states that the Village Core would be developed with several buildings ranging in height from two to ten stories while the NOP states that the buildings will range from two to twelve stories. IS at 2-5 and NOP at 9. The IS also states that the Project allows 2 levels of podium parking that could be up to 21 feet above ground level. *See* IS Table 1-2: Proposed Land Uses at 1-6. The EIR must disclose the total number of stories that could be allowed within the Specific Plan area and the height of each structure.

- *Transit Center.* The Project includes a Transit Center (IS at 1-9) but neither the IS or NOP describe this critical facility.

- *Emergency Access Routes.* The Project includes Emergency Vehicle Access routes (IS at 1-12, 2-58), but neither the IS or NOP identify these route locations or explain how they would function.

- *Parking.* The Project includes parking, but neither the IS or NOP identify the specific location of parking structures or the amount of parking that would be provided. Instead, the IS merely states that parking would be provided in a variety of facilities. *Id.*

- *Public Services and Utilities.* As discussed below, critical Project components relating to water supply, water infrastructure, wastewater service and storm drainage remain undefined.

- *Actions and Entitlements.* The IS states that the Project would include amendments to the Placer County General Plan, the Squaw Valley General Plan and Land Use Ordinance and a rezoning of the proposed Specific Plan area. Neither the IS or the NOP provide any insight as to the purpose and need or the specific nature of the amendments and rezoning. These issues must be comprehensively addressed in the EIR in order to understand the implications for Squaw Valley and the region.

In sum, the NOP is inadequate in that it fails to describe the size, type and number of uses and activities proposed, their timing, or their exact location. Indeed, inasmuch as this Project appears to be at the earliest stages of planning, we question the value in releasing an NOP prior to the applicant identifying specifically what is contemplated for the Project site.

B. Analysis of the Project's Probable Environmental Effects

An EIR must provide a degree of analysis and detail about environmental impacts that will enable decision-makers to make intelligent judgments in light of the environmental consequences of their decisions. California Environmental Quality Act ("CEQA") Guidelines § 15151; *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692 (1990). To this end, the lead agency must make a good faith effort at full disclosure of environmental impacts. In order to accomplish this requirement, it is essential that the project is adequately described and that existing setting information is complete. *See County of Inyo v. City of Los Angeles*, 71 Cal.App.3d 185, 199 (1977). Both the public and decision-makers need to fully understand the implications of the choices that are presented related to the project, mitigation measures, and alternatives. *Laurel Heights Improvement Ass'n v. Regents of University of California*, 6 Cal.4th 1112, 1123 (1988). Here, the NOP and IS explain that the EIR for the proposed Project will be both a project-level and programmatic document. IS at 1-16. The IS states, "[t]he analysis of Phase I will be correspondingly more detailed than the analysis of later phases, which will be analyzed at a program level." *Id.*

As an initial matter, a program EIR does not justify a lack of detailed analysis. Numerous CEQA provisions clarify that "tiering [e.g., preparing a program EIR followed by a project-level EIR] does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration." Guidelines §15152(b); *see also id.* §15152(c). Rather, "[t]he degree of specificity required in an EIR must correspond with the degree of specificity of the proposed project. An EIR on a construction project will necessarily be more detailed in the specific effects of the project . . . ." *Id.* §15146. This rule persists regardless of "any semantic label accorded to the EIR." *Friends of Mammoth*, 82 Cal.App.4th at 534. Given that the County intends to allow project level approvals—not simply *study* the planning for Squaw Valley—in reliance on this document, the EIR is obligated to analyze all foreseeable impacts of development projects anticipated under the proposed Specific Plan.[1] Moreover, the IS identifies the Project's proposed land uses, in tabular and graphic formats. *See* Table 1-1 and Exhibits 3 and 4. We can find no logical explanation as to why the EIR would not include project-level environmental impact analysis of the *entire* Project.

[1] The Project applicant requests, among other actions and entitlements, the approval of a development agreement. IS at 1-21.

1. Biological Resources

Numerous biological communities and habitat types occur in the Project area. The IS acknowledges that there are about 18 acres of mixed coniferous forest, 9 acres of creek/riparian habitat and about 2 acres of meadow habitat. IS at 2-18. Neither the NOP or IS provide any indication as to the extent of impacts to these communities and habitats. Instead, the documents suggest that impacts would be minimal since "most of the plan area is already developed." NOP at 9. The NOP also does not identify the proposed study areas (which will differ by species), the thresholds of significance, or potential mitigation measures.

A full analysis of the Project-specific and cumulative effects on biological resources impacts will be essential to development of effective mitigation measures to ensure that biological resources' impacts will be fully offset. This detailed analysis must be prepared by a qualified, independent biologist with expertise in upland and riparian habitats. The biological resources study must be based on surveys and detailed field studies that are completed at appropriate times of the year for each species potentially in the area. A search of the California Natural Diversity Database ("CNDDB") maintained by the Department of Fish & Game is a good starting point, but it is not sufficient to provide the level of detail necessary for the EIR. The EIR must also include wetland delineations to the extent they have been completed by the U.S. Army Corps of Engineers.

Mitigation measures for impacts to biological resources should be supported by the U.S. Fish and Wildlife Service, the Department of Fish and Game, and the U.S. Army Corps of Engineers. Deferral of mitigation measures until specific projects are proposed and federal and state permitting processes have begun is not appropriate.

2. Hydrology and Water Quality

The EIR must determine whether development of the proposed Project would result in the violation of any water quality standards, result in substantial new amounts of polluted runoff, deplete groundwater supplies or interfere with groundwater recharge, alter the existing drainage pattern of the site, or place within a 100-year flood zone structures that would impede or redirect flood flows.

Significant impacts to the hydrologic regime and water quality are likely as a result of the construction and operation of the proposed Project. Impacts to water

quality and groundwater supplies will occur both from construction activities and the ongoing development projects. Moreover, although portions of the Project area are located in a 100-year floodplain (IS at 2-37), the NOP does not disclose whether structures would be placed within the floodplain that could impede or redirect flows. The EIR should provide an exhaustive and detailed analysis of the Project's hydrological and water quality impacts and identify feasible mitigation for any impacts determined to be significant.

3. Water Supply

The Project proposes to use groundwater to supply water to the Project. IS at 2-38. The EIR must include a comprehensive water supply assessment that takes into account long-term availability of water supplies. This analysis must identify the water supply for peak day under build-out conditions, fire flows, and cumulative development while demonstrating that adequate flows will be maintained for Squaw Creek, Truckee River and all other water bodies. The analysis must evaluate whether the Project can be adequately served by existing water supplies and entitlements or whether it would require construction of new water facilities or expansion of entitlements. Such an analysis is critical inasmuch as the IS concedes that sufficient water supplies may not be available to serve the proposed Project. IS at 2-61, 62.

As regards water supply facilities, the IS' discussion is cursory and vague. It asserts that water would be delivered to the plan area from "strategically placed wells that would work in concert with existing wells in the Valley." IS at 2-61. The EIR must clearly identify and describe the water supply facilities that would need to be constructed to serve the proposed Project and analyze the environmental impacts associated with this infrastructure.

4. Visual Resources

The EIR must analyze the impacts of the proposed Project on aesthetics including scenic vistas, scenic resources (including trees), and the juxtaposition of the proposed development with the existing resort, much of which consists of low-rise structures. This analysis must include clear graphics showing pre- and post-Project visual conditions. Given the Project's substantial increase in height and mass, it will be particularly important to use appropriate techniques to disclose the Project's aesthetic impacts. To this end, the EIR's analysis should include the use of story poles as well as photographic simulations.

5. Cultural Resources

The Project site is considered archaeologically sensitive with at least one recorded prehistoric site in the Project vicinity. IS at 2-21 and NOP at 9. In addition, several buildings located in the Project area and proposed for demolition as part of the proposed Project were constructed for the 1960 VIII Olympic Winter Games. Three of these structures appear to meet the criteria for listing in local, State, or federal historic registers. *Id.*

The EIR must provide a comprehensive inventory of archaeological and cultural sites and evaluate impacts to those resources caused by construction of facilities and infrastructure, as well as any potential operational impacts to accessible cultural resources caused by the increase in use caused by the Project. Such an assessment is critical in order to identify effective mitigation measures needed to protect those resources.

6. Land Use and Planning

In the IS' discussion of potential land use planning conflicts, the document focuses almost exclusively on the Project's conflicts with the existing Squaw Valley General Plan and Land Use Ordinance ("Existing Ordinance"). The IS makes no mention of other applicable plans in the region, other than a cryptic statement regarding potential inconsistencies with the Placer County General Plan. According to the CEQA Guidelines (§ 15125(c)) knowledge of a project's regional setting is critical to the assessment of environmental impacts, especially in regions with rare or unique resources. To this end, the EIR should identify all relevant regional plans and include a detailed assessment of the Project's inconsistencies with these plans.

As mentioned above, the EIR acknowledges that amendments will be required for the Existing Ordinance. The IS does not, however, identify the specific amendments that are contemplated. Instead, it states that amendments would be required to make relatively minor changes to the locations where development would be allowed. IS at 2-43. Although the IS asserts these amendments are minor, the document explains that they could in fact result in inconsistencies with the County General Plan and even the Existing Ordinance itself. The EIR must identify the specific inconsistencies with the Existing Ordinance, analyze their environmental implications and propose mitigation measures or Project alternatives to remedy these inconsistencies. The EIR must also identify and analyze the Project's inconsistencies with the Placer County General Plan and specifically identify the proposed amendments to the County's General Plan,

7. Population and Housing

The IS and NOP acknowledge that the Project would increase the population of Squaw Valley, but neither of the documents provide sufficient information to allow for informed comments. It will be important for the EIR to identify the existing population of permanent Squaw Valley residents, the number of existing daily visitors and the same figures upon implementation of each phase of the proposed Project.

The IS states the Project would develop up to a maximum of 3,238 bedrooms and commercial space to 454,000 square feet and that this level of development is less than the maximum amounts allowable under the Existing Ordinance. IS at -2-50. Although the Project may result in reduced population-related impacts in comparison to the Existing Ordinance, the Project's environmental impacts should be evaluated against a baseline of existing conditions. CEQA requires that existing conditions at the time an agency prepares environmental review, rather than some hypothetical future scenario, establish the "baseline" for determining the significance of impacts. *See* CEQA Guidelines § 15125(a); *see also Save Our Peninsula Cmte. v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 125; *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal. App. 3d 350, 354.

The EIR must also identify the Project's impact on employee housing. The County General Plan Housing Element requires that new resorts in the Sierra Nevada and Lake Tahoe region provide for employee housing equal to 50% of the housing demand generated by the Project in one (or any combination) of the following ways: construction of employee housing on-site; construction of employee housing off-site; dedication of land for needed units; or payment of an in-lieu fee. The Project would increase the number of employees in the Plan area but we can find no component of the Project that includes employee housing. The EIR must analyze this significant environmental impact.

Finally, the Project could result in substantial growth in the area or in nearby communities and these impacts must be analyzed. The growth inducing analysis in the EIR must include: (1) an estimate of the amount, location, and time-frame of growth that may occur as a result of the Project and (2) identification of mitigation measures or alternatives to address significant direct and indirect impacts.

8. Transportation

The EIR should provide a comprehensive analysis of the Project's traffic impacts. It will be important for the EIR consultants to accurately identify the Project's trip generation. For the Project's residential uses, the consultants will need to identify the trip generation by unit and by bedroom. If these figures vary, it will be important that the highest numbers be used in the transportation impact analysis.[2] Using this trip generation data, the EIR must then analyze traffic levels for each phase of development and build-out. Separate analyses must also be conducted for summer and winter peak seasons since roadway conditions in the winter will be constrained by snow and ice and associated snow removal equipment. The EIR must also conduct these analyses for cumulative conditions.

As discussed above, the EIR should clearly identify the amount of existing parking and the amount of parking that will be provided upon each phase and upon build-out of the Project. The document should also distinguish between the parking expected to handle day skiers/visitors and the parking associated with residential uses.

The EIR must identify and describe the Project's Transit Center. An effective transit network serving the Project site has the potential to reduce many of the Project's significant environmental impacts including traffic, air quality, greenhouse gas ("GHG") emissions, noise, and water quality. If the Project does not include a robust transit program – and its entirely unclear whether it does --, one should be developed as mitigation for the Project's many significant environmental impacts.

The NOP makes no attempt to identify potential mitigation measures for the Project's transportation impacts. Instead, it admits that the Project may be unable to fully mitigate its potential traffic impacts. IS at 2-58. Failure to consider feasible mitigation measures would violate CEQA's clear provision requiring the identification of feasible mitigation measures for a project's significant impacts. *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 79.

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[2] The trip generation rates must be based on the number of keys rather than the number of units. As the IS explains, visitor use could exceed the number of units because "a portion" of the 2- and 3-bedroom units would be periodically locked off to create individual rooms (keys). IS at I-16, Table 1-4.

9. Air Quality

The IS acknowledges that Placer County is designated as a nonattainment area for the state and national ambient air quality ozone standards, and the state PM_{10} standards. IS at 2-13. For this reason, it will be important that the EIR contain a thorough analysis of Project-related and cumulative impacts to air quality. Particular attention must be paid to comprehensively identifying each source of emissions that would be generated by the Project, including motor vehicle traffic, maintenance equipment, stationary sources of emissions such as boilers, and area sources, including wood-burning fireplaces. The EIR must also carefully identify and analyze construction-related increases in toxic air contaminants and criteria air pollutant emissions.

10. Greenhouse Gas Emissions and Climate Change

The EIR must address climate change impacts and specifically analyze how the Project would comply with AB 32, the Global Warming Solutions Act of 2006. The IS acknowledges that the proposed Project could potentially conflict with the goals of AB 32 and other applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. Yet, neither the IS or the NOP identify the thresholds of significance the EIR would rely upon, or the methodology for analyzing the Project's increase in GHG emissions. Nor does the NOP even identify the other applicable GHG-related plans, policies or regulations that the Project would be required to be consistent with.

The County must ensure that the EIR accurately identifies the Project's increase in GHG emissions and adequately analyzes how the increase in emissions would contribute to climate change. It will be critical that the mitigation measures for the Project ensure that GHG emissions are reduced to less than significant levels.

We also strongly recommend that the EIR examine the likely effects of climate change on the Project. For example, climate change will likely reduce snowpack and therefore reduce available water supplies. It is simply not possible to adequately evaluate the Project's impacts on water availability without taking into account the potential for reduced water supplies. We urge the County and EIR consultants to seek appropriate guidance on conducting GHG impact analyses and incorporate all climate change adaptation strategies as part of the mitigation for climate change impacts.

11. Wildland Fire, Emergency Response and Evacuation

According to the IS, the Project site is located in a wildland area that may contain substantial forest fire risks and hazards. IS at 2-35. The Project would generate

additional vehicle trips (both during construction and long-term Project operation) and could result in construction-related road closures. *Id.* at 2-34,35. NOP at 11. Although the NOP explains that these traffic delays and road closures would result in a potentially significant impact, the document does not identify any thresholds of significance or suggested methodology for analyzing this critical public safety impact.

Nor do the IS or NOP disclose that access to Squaw Valley is provided via a single two-lane highway. In the event of a wildfire, it may be impossible for emergency response vehicles to access the Project site or for area residents or resort visitors to evacuate. A thorough analysis of this issue is particularly important in light of the fact that it may not be possible to mitigate the Project's significant traffic impacts. IS at 2-58.

The EIR must also provide information about current and projected levels of service and response times for fire, police and emergency services. A detailed analysis of Project and cumulative development demands must be included in order to determine whether there will be a need for expansion of services. Where expansion of services would have environmental impacts, the EIR must analyze those impacts as well.

For each service, the EIR should provide the following information: (1) present capacity of the service including all relevant facilities, (2) current demand, (3) current remaining capacity or deficit, (4) projected need under cumulative conditions, and (5) planned expansions of services or facilities.

12. Utilities and Services

The EIR must identify the increased demand for all essential public services and utilities (e.g., police, fire, schools, parks, the wastewater treatment system, and solid waste) resulting from the proposed Project (under each phase and upon build-out) and compare this increase in demand with available capacity. The document must determine whether capacity exists to serve allowable development without reducing existing services. In addition, the EIR must analyze the cumulative demand for these services, utilities and facilities. Where expansion of services would have environmental impacts, the EIR must analyze those impacts as well.

13. Cumulative Impacts.

An EIR must discuss the cumulative impacts of a project when the incremental effects of a project are considerable when viewed in connection with the

effects of other past, current, and probable future projects. CEQA Guidelines §§ 15130(a), 15065(c). The analysis of cumulative impacts is particularly important in the context of long-range planning documents because the growth allowed under such plans is often substantial and because they set forth the policies that will guide the development of future, individual projects for many years. As noted in the CEQA Guidelines, one requirement of an EIR for planning documents is that they provide a more thorough analysis of cumulative impacts than is required for individual projects. *See* CEQA Guidelines § 15168.

A legally adequate cumulative impacts analysis must consider the impacts of the Project combined with other past, present, and probable future projects. CEQA Guidelines § 15130(b)(1). Projects currently under environmental review clearly qualify as reasonably probable future projects to be considered in a cumulative impacts analysis. *See San Franciscans for Reasonable Growth v. City & County of San Francisco*, 151 Cal. App. 3d 61, 74 n.13 (1984). In addition, projects anticipated beyond the near future should be analyzed for their cumulative effect if they are reasonably foreseeable. *See Bozung v. Local Agency Formation Comm'n*, 13 Cal. 3d 263, 284 (1975).

The EIR's discussion of cumulative impacts should address any other pending proposals for development within the Project vicinity that would threaten impacts of the sort promised by the Squaw Valley Project. Although the County recently received a separate application by the Squaw Valley Resort for the Squaw Valley Timberline Twister Project, the NOP does not acknowledge this Project. According to the Project Description for the Twister Project, the purpose of the project is to "improve utilization of our facilities and increase job opportunities during the summer, and provide a broader spectrum of recreational opportunities to the public on a year-round basis." *See* Squaw Valley Resort Timberline Twister Project at 1. The Twister Project would result in numerous environmental impacts including the loss of about six acres of trees, construction disturbance of two acres. *Id.* The Squaw Valley Specific Plan Project EIR must analyze the cumulative effects of the Twister Project as well as all other cumulative development projects in the region.

C. Project Alternatives

CEQA emphasizes that an EIR must analyze a range of reasonable alternatives to the project. The alternatives must feasibly attain most of the basic project objectives while avoiding or substantially lessening the project's environmental impacts. (*See* Public Resources Code § 21100(b)(4); *see also* CEQA Guidelines § 15126.6(a).) The CEQA Guidelines state that the selection and discussion of alternatives should foster

informed decision-making and informed public participation. (*See* CEQA Guidelines § 15126(d)(5).)

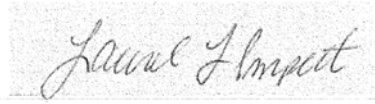
Given the significance of resources in Squaw Valley, the County should consider several alternatives to the proposed Project. Unfortunately, the NOP does not identify *any* Project alternatives. Although the IS and NOP do not provide sufficient detail about the severity and extent of the Project's environmental impacts, what little information that is presented makes clear that the Project will result in extensive environmental impacts. Accordingly, the EIR must identify and evaluate an alternative that calls for a substantial reduction in the level of development on the Project site. The County should also explore alternative locations for the proposed Project (e.g., increasing development intensities at other ski resorts that may result in fewer environmental impacts).

II. Conclusion

Thank you again for the opportunity to provide these comments. Sierra Watch looks forward to working with the County as environmental review for the Project proceeds. Please provide this office with notification of the release of the draft EIR for the proposed Project. Please also keep us informed of all contracts, notices, hearings, staff reports, briefings, meetings, and any other events related to the Project.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Laurel L. Impett, AICP, Urban Planner
Amy Bricker

cc: Tom Mooers, Executive Director, Sierra Watch
Peter Van Zant, Field Director, Sierra Watch

442397.1

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November 8, 2012

VIA E-MAIL CDRAECS@PLACER.CA.GOV
AND FEDERAL EXPRESS

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

Re: Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan and Phase 1 Project.

Dear Ms. Krach:

Thank you for the opportunity to comment on the Notice of Preparation ("NOP") of a Draft Environment Impact Report ("EIR") for the proposed Village at Squaw Valley Specific Plan ("Project"). This letter is submitted on behalf of the Squaw Valley Lodge Owners Association ("SVLOA"). SVLOA is a 218 member/unit condominium style hotel located on Squaw Creek Road, past the Cable Car building, and adjacent to the Project area. SVLOA is very encouraged by KSL's "Squaw Renaissance". Developments of the mountain and base facilities to date have been thoughtful and welcome. However, the Project charts an aggressive expansion of Squaw Valley. We believe that the EIR should fully evaluate the Project and its consistency with the existing character of the neighboring area to insure that the Village is developed with minimal impacts to the surrounding environment. SVLOA has the following comments on the scope and content of the EIR for the Project.

AESTHETIC IMPACTS

SVLOA is located adjacent to property within the Project area with a proposed designation of Village Commercial–Core (VC-C). Under this designation, buildings up to 10 stories (140 feet) are allowed.

The Initial Study states that Parcel O of the Project area, adjacent to SVLOA, would be developed with a major condo hotel. The buildings surrounding Parcel O do not exceed three-stories in height. Such a large hotel has the potential to obstruct scenic vistas from major public viewsheds, including Squaw Valley Road, Squaw Peak Road, and surrounding lodging facilities.

Alaska California Colorado
Idaho Minnesota Oregon Utah Washington

A project with otherwise insignificant impacts may have significant impacts in a particularly sensitive environment. (*Mira Mar Mobile Cmty. v. City of Oceanside* (2004) 119 Cal.App.4th 477, 493.) Squaw Valley's high sierra mountain setting contains a number of major scenic resources. Aesthetic impacts to these public viewsheds should be appropriately analyzed and all feasible mitigation measures and alternatives evaluated. This includes, but is not limited to, mitigation measures and alternatives restricting the height of buildings in the Project area to three stories or fifty-feet in height from grade to rooftop.

SVLOA is also concerned about potentially significant impacts created by glare and light pollution, and requests that the EIR analyze night sky and other appropriate mitigation measures to reduce these impacts such as screened or hooded lighting and prohibition of reflective surfaces. The shadow effect multi-story buildings may have on existing residences in the Project area should also be fully evaluated.

WATER RESOURCES

The Initial Study for the Project determines that implementation of the Project has the potential to deplete groundwater supplies or interfere with groundwater resources, leading to potential significant impacts. The NOP states that a water supply assessment ("WSA") will be prepared as part of the environmental review. To insure that overdraft of the groundwater basin does not occur with build-out of the Project under cumulative conditions, SVLOA requests that the WSA include hydrogeologic/aquifer mapping of the affected aquifer(s).

SVLOA also requests that the EIR evaluate the Project's consistency with Squaw Valley Public Service District's Ground Water Management Plan.

NOISE

Development and operation of a major condo-hotel adjacent to existing low-intensity lodging uses has the potential to result in significant noise impacts. Mitigation measures such as limiting hours of outdoor uses (including pool/spa hours and major outdoor events and activities) and prohibition of outdoor balconies should be evaluated in the EIR, as should noise reduction design practices. In addition, the main entrance to the proposed hotel on Parcel O is adjacent to and less than fifty-feet away from one of SVLOA's lodging buildings. The orientation of the main entrance will create traffic and noise at all hours to this sensitive receptor. SVLOA requests that the EIR evaluate mitigation measures and alternatives to the impacts created by the location of the main entrance, including but not limited to, reorienting the main entrance away from existing residential/lodging uses.

LAND USE

The addition of a ten-story major condo hotel adjacent to existing small-scale lodging/residential uses, none of which exceed three-stories in height, has the potential to create land use conflicts and alter the existing character of the surrounding area. Potentially significant impacts resulting from land use conflicts should be thoroughly analyzed, and project design, alternatives, and mitigation (including lower-density development, height restrictions, and locating parking structures away from existing lodging uses) should be considered.

SVLOA also requests that the EIR analyze mitigation measures and/or alternatives that require setbacks on Parcel O to remain within the same building footprint as currently exist.

TRANSPORTATION/PARKING

The initial study concludes that the Project has the potential for decreased level of service, an increased level of traffic hazards, and roadway degradation due to substantial increase in traffic volumes. As part of the 1999 Draft EIR for The Village at Squaw Valley USA (Intrawest), several mitigation measures were adopted to lessen traffic impacts resulting from development of the Village. These measures have been wholly ineffective to alleviate degradation of LOS resulting from increased traffic at the Village. Current traffic patterns also create pedestrian/vehicle conflicts near the intersection of Squaw Valley Road and Squaw Peak Road. And, parking along Squaw Valley Road and Squaw Peak Road in this area has created unsafe conditions during snow events.

Additional measures to be considered should include locating parking facilities away from the intersection of Squaw Valley and Squaw Peak Roads and directing valet services away from this intersection. In addition, SVLOA requests that the EIR analyze a mitigation measure or alternative that preserves Squaw Peak Road for residential/lodging uses only, and provides access to any new developments in the far west end of the Project area from the Chamonix Roundabout via Chamonix Place and its arteries on the north side of Squaw and Shirley Creeks, and newly bridged from there to form a loop road. The feasibility of providing primary vehicle access to the Parcel O hotel by underground tunnel, preserving the current green space at SVLOA borders to the Tram and Olympic House, should also be fully evaluated.

Finally, SVLOA requests an in depth analysis of emergency vehicle access and evacuation routes in light of the single ingress and egress route into Squaw Valley.

HYDROLOGY AND WATER QUALITY

SVLOA has experienced debris flow and flooding from Squaw Creek during storm events. The addition of impervious surfaces and alteration of existing drainage flows within the Project area may exacerbate these issues. SVLOA therefore requests that the EIR include an analysis of drainage issues and possible upstream effects.

HAZARDOUS MATERIALS AND HAZARDS

There is a large propane tank directly behind Red Wolf Lodge that is used by several lodging facilities, including SVLOA. As proposed, the Project will completely surround this tank. Potential hazards that may result from development in the immediate area of the tank should be evaluated in the EIR.

ALTERNATIVES

Because of the myriad of potentially significant impacts resulting from the development of a hotel on Parcel O, the EIR should evaluate alternative, less impactful uses of this parcel. Accordingly, SVLOA requests that the EIR examine alternative land uses for Parcel O, including commercial facilities.

SVLOA is available to meet with Placer County and KSL Development to discuss these issues in greater detail. In particular, we welcome the opportunity to explore Project design elements and mitigation measures that will avoid or reduce potentially significant impacts discussed above.

Please continue to provide SVLOA notice of the progress of this Project and feel free to contact me at 530-582-2288 if you have any questions or would like to discuss our concerns. Please address all future notices regarding this Project to the attention of:

Art Takaki
Squaw Valley Lodge Owners Asscciation
201 Squaw Peak Road
P.O. Box: 2364
Olympic Valley, CA 96146
Email: art@gpeak.com

Thank you again for your attention to our comments.

Respectfully,

Greg C. Gatto

cc: SVLOA Board

1724 Navajo Ct.
P.O. Box 2131
Olympic Valley, CA 96146

Mr. Alex Fisch, Senior Planner
Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603

November 9, 2012

Dear Alex Fisch,

Below are my comments for the NOP. I would like the following items below to be analyzed in the DEIR for the Village at Squaw Specific Plan.

1. Building Mechanics and Systems noises: what analysis will be done of the noise of the building mechanics such as HVAC, air exchange systems, generators, compressors, water park equipment noise, and any other noises emitted by the building mechanics. As an example, there is currently an unacceptable level of noise emitted by the Resort at Squaw Creek's air system. It is located above ground and it is so loud in some locations with the right no wind situations that people need earplugs to sleep at night. It is so loud on the bike path that it drowns out the noises of nature. It was supposed to be moved underground when phase 2 was built, but with no phase 2, the noise pollution is still there.
2. Squaw Creek/Shirley Canyon Trail: what analysis will be done on the impacts to Shirley Canyon. With the parking area being enlarged and developed as more of a proper trailhead as well as the addition of 1200+ housing units, the traffic in Shirley Canyon will increase dramatically. Currently there is no set trail but a series of meandering trails side by side that provide erosion and destruction of the natural landscape. A proper, designated trail should be built if traffic to the area is going to be increased so that people stay on one designated trail and do not tear up the land. This means actually trail building, not spray painting colored squares on rocks, what is currently there in multiple mismatched places.
3. Snow Storage and CP land: What analysis will be done on the snow storage on the parcel of land zoned CP between the homes on Christy Lane and the Squaw Valley Main road? Currently the snow storage in this area has killed trees, polluted the hillside with garbage, and destroyed other vegetation. It is also a huge noise problem, operating heavy equipment right next to homes. It is being used for commercial snow storage, yet the land is zoned conservation preserve. This does not fit into the allowed uses of this zoning.
4. If an EIR and CEQA determined that the existing Village should be the height that it is, than the currently proposed buildings should be the same height. An analysis should be done of the EIR and planning process that determined the height of the current Village.

5. If water is used for landscaping from wells up high on the ski area, the analysis of the pumping of these wells in relation to the aquifer levels and wells on the valley floor should be made.

Sincerely,

Alisa Adriani
1724 Navajo Ct.
P.O. Box 2131
Olympic Valley, CA 96146
Ph. 530-583-1354
Email: alisa@tahoedreamteam.com

From: Steven Arns
To: Placer County Environmental Coordination Services;
Subject: Squaw Valley Village NOP comments
Date: Friday, November 09, 2012 1:18:38 PM

My first chairlift ride was as a 5 year old on the Squaw Valley Squaw Peak Chair in the late 1950s.
My parents took me to see the Olympic Events and I have many fond memories.
I found it "sad" that the new Village Plan erased most of the remaining venues from the most famous of Squaw Valley events.
I feel that considering **historic preservation** should be considered as an option in these plans.
At a minimum Squaw valley should commit to the Museum movement in the Valley and consider including **historic preservation** and celebration in the core Village area as a **mitigation**.

I see the redefined land use designation in a positive light with my current address fronting Lake Cushing. I **applaud** the **Forest Recreation** land use expansion in this area.
As well I like the general land use designation pattern with emphasis on preserve status for Squaw Creek. A good improvement.

The **development standards for phase four** indicate an access and arrival court in the area that is now the patio at the Chamois.
The **site plan** shows the Chamois remaining and the plan also shows ski access around the current Olympic House to the Tram as now occurs.
Ground level access would conflict with saving the Chamois patio experience and ski access. Underground access and arrival would solve problems here and address concerns Ive heard from Neighbors in the Squaw Valley Lodge. ,concerned about a driveway and congestion between the lodge and the Tram building.
Better yet ,considering keeping the Olympic House and the Chamois as is and **preserving** some early lodge history and well as Olympic History would mitigate historic preservation and help the community keep some current Squaw Valley **Experience** alive.

Steve Arns
Squaw Valley Lodge #157
601 Mund Rd St Helena Ca 94574
707 963-5736

From: Doris Bajka
To: Placer County Environmental Coordination Services;
cc: Mik Bajka;
Subject: NOP Comments - PSPA 20110385 (Squaw Valley Ph I).
Date: Friday, November 09, 2012 2:40:44 PM

Maywan Krach,

Please find below comments on the Proposed Village at Squaw Valley Specific Plan and Phase I Project.

Email if you have questions or need a revised format. Please confirm receipt.

Thank you,

Doris Bajka

Written Comments for NOP Comment Period PSPA 20110385

I am not clear on the proper format for written comments so I will just list my comments in the form of questions.

1) Who received a copy of the 'Notice of Preparation of a Draft Environmental Impact Report' dated October 10, 2012 addressed to "Agencies and Interested Parties?" I am an interested party and have owned residential property in Squaw Valley since 1986 (the same property for all 26 years, not various different properties) and did not receive a notice. I am responding based on notification received via a different property (also in SV) that we receive mail for.

2) Traffic Considerations/Impacts as a result of additional high density residential structures and tourist attractions proposed in Squaw Valley:

a. What are the impacts to traffic on Hwy 89 due to the expected increase in traffic into and out of SV as a result of the increased residential availability in the Valley? What are the plans to mitigate the impacts to existing SV residents, Tahoe City, Alpine Meadows, and the Truckee area? What are the potential impacts to Interstate 80?

b. What are the impacts to entrance and egress of Squaw Valley including foreseeable impacts to current residence, property owners, and long time day users of SV? How might the increased traffic affect emergency services, commute times, product deliveries, services, etc?

c. What are the impacts to the air quality in the valley as a result of increased emissions from the additional traffic? What are the health impacts to residents of the valley especially on days where there may be a high volume of vehicle traffic and weather conditions that facilitate an inversion layer?

d. What are the environmental impacts to the meadow, Squaw Creek, the surrounding National Forest land, all flora and fauna, as well as mammal health and populations due to the increased traffic/emissions?

3) What are the possible environmental impacts to wildlife habitat with the increased human presence and facilities?

4) What are the potential short term and long term impacts to the water quantity and quality for SV residence and property owners? Are there any possible cost implications (short term or long term) to current residence with regard to water as a result of any phase of this project?

5) If well water is used (either in part or combination with a surface water supply), what are the impacts to the ground water table? What is the overall estimated impact to the aquifer used (longevity and quality of water)? Would there be any impact to aquifers above or below the aquifer proposed if well water is used? What are the impacts to the quality of water remaining in either ground water or surface water sources? How would water be transported if surface water is used?

6) Would there be any impact to the current water pressure provided to existing residential properties in SV?

7) How would flood control be considered or impacted?

8) How would service interruptions or outages to current residential

property owners be mitigated during any construction phase of this project?

9) Would there be any cost or service impacts to local residents for existing services (power, water, sewer, cable/internet, etc).

10) What are the possible effects on the local public schools or other available education opportunities in the local area (including Squaw Valley, Truckee and Tahoe City)?

11) With the added high density residential facilities and any other new residential structures proposed under this plan, what the possible impacts to the traffic and demand associated with obtaining basic living supplies and necessities (groceries, fuel, etc.)?

12) What are the impacts to current snow storage and associated runoff? What are the specific environmental impacts to increased snow removal and storage requirements due to the proposed improvements? How will they be mitigated?

13) Has reducing the 'carbon footprint' of SV been considered with this new project? Is there an effort to 'go green' (use of solar/PV panels etc)?

Vladimir Bazjanac, Ph.D.
P.O. Box 4158, Berkeley, CA 94704-0158
e-mail: *vlado@cal.berkeley.edu*
telephone (510) 548-4440
fax (510) 848-6420

November 8, 2012

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

Re: Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan and Phase 1 Project.

Dear Ms. Krach,

I am a property owner in Squaw Valley: I own condominium 218, Squaw Valley Lodge, 201 Squaw Peak Road, Olympic Valley, CA 96146. The proposed Village at Squaw Valley Specific Plan will, if and when executed, inevitably increase the volume of traffic in Squaw Valley. Squaw Valley Road already gets clogged during morning and late afternoon hours on peak ski days, and when bad weather stalls traffic on Hwy 89 leading to Truckee and/or Tahoe City.

I respectfully request that, besides analyzing the impact of the traffic *volume*, the EIR analyze the specific impact on pollution and air quality caused by idling vehicle engines when vehicles are *stalled* along the full length of Squaw Valley road.

Respectfully yours,

Vladimir Bazjanac

BetMar Construction
PO Box 3757 Olympic Valley, CA. 96146
(530)583-9363 phone (530)583-9364 fax

Placer County, Planning Services Division
3091 County Center Drive
Auburn, CA. 95603
Attn: Maywan Krach; Alexander Fisch

To Whom It May Concern,
Regarding Public Scoping Meeting for "Village at Squaw Valley Specific Plan Project":

Marketing -Most all ski resorts depend on early season snowmaking as necessary for a consistent, high quality, early season condition. Reliable early season coverage is critical to obtaining advanced reservations from destination visitors/ out of state visitors who must make reservations plans in advance of the ski season. What will be the outcome in a drought specific year? How will water supplied for a mountain resort and village area be maintained? Does this not present a catch-22? How will marketing efforts to lure skiers into Squaw Valley away from other destination resorts that have plenty of snowfall? How will this competition for resources by all "corporation owned resorts" be evaluated in this Master Planned resort?

Social & Economic Issues – Has KSL considered a Lift ticket tax to mitigate the effects on Tahoe City? What will be the economic Impact on Tahoe City with this type of resort put in place? I would also like to see the following questions answered.

- What is the current Wage base?
- What is the average number of hours worked by seasonal workers?
- What proportion of the workforce are Truckee/Squaw Valley/Tahoe City local residents as opposed to International or transient workers?
- Has a preference been given to local job creation?
- What is the average hourly wage of seasonal workers?
- What is the cost benefit to the local economy?
- What will be the change in employment/wages as a result of the Squaw Valley plan?
- What has Squaw Valley paid in local taxes to support local service in the last 5 years?

Visual Impacts-Nighttime "Sky Glow" on a scenic vista with proposed 10 story building and 14 feet of podium parking above ground. What will be the effects on surrounding residential areas and also Alpine Meadows residents? Nighttime lighting especially in such a pristine environment will have a significant effect on the abundant nocturnal wildlife of Squaw Valley. Will there be a reasonable range of feasible alternative that analyze potential mitigation for biological impacts created by nighttime light pollution at this project?

Parking – This addresses day skier and employee parking. Where will this be located? Will day skiers now have to pay for underground use? If so, what will be the cost and what will be the rate in future years?

Buildings – Will the new buildings be Leed certified, if so to what extend? Is there any part of the building that will be using Solar; Solar Thermal; Heat exchange pumps; EV stations and Wind? If so, how much?

Caltrans – Has discussions for a Roundabout at the Intersection of Highway 89 and Squaw Valley been Investigated?

GHG –I would assume that a study to exam the exceeded thresholds during course of construction along with Trucks and Vehicle idling; traffic flows and the amount of new fireplaces from this type of construction will all be looked at? I would also like to see an expanded analysis to include vehicle miles traveled associated with increase visitor capacity as well as the related mobile source emissions inventory.

Construction – Who will control and monitor the amount of dust emission. Curbs gutters and walkways. Why is there so much instead of nature trails? Is this paving of **paradise** another source of Climate Change? Height limits seems to change every few days, what are the new heights of this proposed project?

American Native Tribes – Who originally lived in the Valley. Which Tribes were invited to submit scoping comments or to participate in the planning process?

Thank you

Mary Bennett (30+-year resident)
PO Box 3757
Olympic Valley, CA 96146

November 1, 2012

Alex Fisch, Associate Planner
Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603

Re: KSL development related to NOP of draft EIR

Dear Mr. Fisch:

This letter follows an earlier one (8/12/12) that critiqued the current proposal with respect to stipulations in the SV General Plan. Some of the points contained therein are relevant to the present consideration of plan specifics.

The Initial Study Checklist provided by your department impresses me as most thorough and comprehensive. So perhaps no more needs be said than to expect/hope that each of the potentially significant impacts will be approached from the standpoint of eliminating any features for which truly significant mitigation is not possible.

Re: features of Phase 4 and Phase 1 of the development from our perspective as Tram Condominium homeowners on Squaw Peak Road:

1) Phase 4 proposes: a) a 6-story structure from the tram building with a 10-story structure replacing the Olympic House.

i) This would absolutely destroy rather than "preserve important scenic vistas" from our unit. We had hoped to at least be able to literally shut out the worst visual aspects of this project (even if not noise and congestion) when we are inside our home. While 'out of sight out of mind' is perhaps a dubious possibility in the best of circumstances, it would be impossible if these structures are allowed.

b) Parking accommodations that will have access and egress from Squaw Peak Road.

ii) This would add unacceptably to the congestion on Squaw Peak Road that is already problematic at the corner of Squaw Peak Road and Squaw Valley Road (at the tram building).

Mitigation measures (for these problems of obstructing views and reducing congestion):

a) Reduce the height of all buildings in the Village Commercial area closer to the 5-story height assumed in the SV General Plan (p.48) than the proposed 168 feet.

b) Rather than placing the tallest buildings closest to the mountain, construct all those of maximum height on the east side of the parking lot, i.e., next to and parallel to Squaw Valley Road. I think the existing residences on the other side of SV Road are at sufficient elevation that their views won't be compromised. Building out the Village Core area in this manner will eliminate adding the injury of loss of views to the insult of the inevitable greater congestion and noise for all who currently own units here.

2) Re: Phase 1: In addition to lowering heights of buildings, eliminate the 132,000 square foot MAAC, in favor of fostering those 22 recreational activities suggested in the SV General Plan (p. 30) to which SV lends itself more naturally.

The developer's plan will forever change the character of Squaw Valley from a more tranquil to a more frenetic ambiance. In an effort to respect the literal and figurative views of those who prefer the former, it would seem reasonable to arrange the development in a way that does not obstruct existing views of the ski hill from extant residences. Other areas of California accord the same priority to existing views in the face of new construction.

Thank you for your consideration in these matters.

Sincerely,

H. Spencer Bloch, M.D.

54 Reed Ranch Road
Tiburon, CA 94920-2083
(415) 388-2696

From: drbob2sail@aol.com
To: Placer County Environmental Coordination Services;
Subject: Squaw Valley /Olympic Valley specific plan
Date: Monday, October 29, 2012 12:42:10 PM

I am a resident in Squaw Valley at 415 Squaw Peak Road, Unit # 6.
The Squaw Valley Special Plan is large in scope, but there is a small detail that directly effects where I have a residence.
The special plan calls for a parking lot directly west of Squaw Peak Road in the vicinity of Shirley Canyon. This is a residential area occupied by many condominium buildings and accessed by Squaw Peak Road. I don't think that anyone who reads this would want a large corporation to put a parking lot in their backyard area. This has potential of creating considerable car traffic congestion and littering in a residential area. Hundreds of mature trees in the forested portion would have to be cut down. Also the Northern end of this parking lot would be built in an area designated as an avalanche zone. Allowing a public parking facility in an avalanche zone could be a costly endeavor for the county.
For these reasons, I object to a parking facility adjacent to Squaw Peak Road and hope that you will reject this portion of the plan. An alternative, for the Squaw Valley Corporation, is to provide shuttle service from their large parking lot facility at the ski lifts to the Shirley Canyon area for individuals who do not want to walk the short distance. This would provide a way of restricting automobile congestion and littering in a residential area.

Sincerely, Robert Bloom M.D.
DrBob2sail@aol.com
510 918 3855

Nancy J. Brandt (aka Nancy Duarte Matarese)
3917 Warbler Drive
Antioch, CA 94509
-also-
1850 Village South Road #326
Olympic Valley, CA 96146

Via: **Email and U.S Mail**

November 9, 2012

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

RE: Proposed Squaw Valley Specific Plan

Dear Maywan:

As a property owner in Squaw Valley, I am writing to express my concern regarding the proposed development outlined in the Village at Squaw Valley Specific Plan. This letter is to provide comments on topics to be addressed in the EIR for the project.

To begin, I am concerned that Squaw Valley has not updated its Community Plan since 1983 although California State Law requires that cities and counties prepare and adopt a community plan every 20 years. The proposed Squaw Valley Specific Plan is using as a basis for development a Community Plan that is 29 years old. Furthermore, California state law §65450 et. seq. states that "[A] Specific Plan is a hybrid that can combine policy statements with development regulations,' however, 'specific plans must be consistent with all facets of the general plan including the policy statements.'" In reviewing the Specific Plan as put forth by the developers, the land use designations are not consistent with the land use designations in the Placer County general plan. (See Table 1-1 of the General Plan "Relationship Between General and Community Plan Land Use Designations") The General Plan has for simplification purposes combined and/or re-named many land use designations used by community plans. For example, the land use designation "Forest Recreation" has been renamed in the General Plan to "Resorts and Recreation," "Village Commercial" is renamed "General Commercial. Furthermore, the General Plan has added uses for these designations which do not match with the uses described in the 1983 Squaw Valley Community Plan. The 1983 Plan does not allow lodging in the "Forrest Recreation" land use designation but the General Plan does include ski resort facilities including residential, transient lodging and commercial uses. For just this reason alone, the Squaw Valley Community Plan should be updated as a collaborative effort of community residents, property owners and other stakeholders and

be the foundational document on which any specific plan is be based. To prepare a Specific Plan which will serve as the guiding document for development in this Valley for the next "12-15 years" based on a Community Plan which is 29 years old is a flaw in the development process and does not serve the residents and homeowners of Squaw Valley and the greater Tahoe/Truckee region.

In addition to the other items mentioned to be studied in the EIR I believe potential for avalanches within the proposed development area should be included. The 1983 Community Plan describes areas where there is significant potential for avalanches. Specifically it states "at Red Dog Ski Lift, continuing removal of tree cover from once heavily timbered slopes now allows avalanches that originate the 7,000' level to fall to the valley floor." Mitigating measures in avalanche zones in the 1983 Plan states that "In high hazard zones, no building or winter parking facilities are permitted; in potential avalanche hazard areas, only summer recreational facilities are permitted in the plan. Lodges, school, residences, or any buildings which encourage a gathering of people should not be constructed in these areas and are not permitted based on the General Plan. Summer recreation facilities could be considered." In looking at map for Phase 1 of the Specific Plan, with the changes proposed in the land use designation from "Forest Recreation" to "Village Commercial" to accommodate the "landmark condo hotel," this structure is positioned at the base of the Red Dog ski lift and therefore according to the 1983 plan within an avalanche zone. It is perhaps because of this avalanche zone that historically this area has been designated as "Forrest Recreation" rather than "Village Commercial" and should remain that way.

Other impacts to neighboring structures, mainly the existing Village that should be further explored are the proposed structures which adversely affect the views of those units, possible interruption of the adjoining property's potential for solar access (sunlight in units) and noise impacts. The Specific Plan does not call for any road improvements in Phase 1 however this Phase will bring a number of minimum wage jobs to the Valley to which the employees will have to commute. The impact on traffic should be explored with this in mind.

It is imperative to weigh the immediate and long-term benefits of development against the long-term cumulative adverse effects of this Specific Plan. I look forward to the opportunity to continue to comment on this development so that we may create a destination resort that all can enjoy.

Sincerely,

Nancy Brandt
(aka Nancy Duarte Matarese)

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ENVIRONMENTAL COORDINATION SERVICES

To: Maywan Krach
Community Development Technician
Placer County Community Development Resource Agency
From: Sally Brew, PhD

Following are concerns that I have with the Squaw Valley Real Estate, LLC, proposed development for Squaw Valley

1. The height of the buildings up to 154 feet above the ground will clearly negate some of the natural beauty of Squaw Valley. The valley is in a box canyon so cannot spread out over acres of land. As stated in the 1983 Squaw Valley General Plan and Land Use Ordinance: "For the future development of Squaw Valley both the quality and quantity of development must be planned to conserve, protect, and enhance the aesthetic, ecological and environmental assets of Squaw Valley." Clearly tall buildings plus the MAAC do not enhance the aesthetics of Squaw Valley. When driving into the valley large hotels and buildings would greatly detract from the initial views of the mountain.

2 Already in the winter, the two lane highway is extremely crowded on week-ends. With potentially 1300 more renters and guests going to and from the new condos and hotels, the experience could turn potential visitors away after a bad experience sitting in traffic. In addition if the village is as large as originally envisioned the traffic on Highway 89 could also be affected. Parking places appear to be inadequate for the thousands of day skiers. No viable plan has been given where parking could be so buses could bring visitors into Squaw Valley. Statistical information is needed to measure the number of drivers coming into the valley especially during the winter week-end traffic.

3. The MAAC is very large compared to buildings around it. Its size takes away from the beauty of the mountains behind it. Unfortunately it is not an out-door experience for families coming to the mountains. The MAAC is an artificial entertainment that does not belong in a mountain village. In addition the amount of water needed seems out of proportion to a community that does have water concerns.

4. Employee housing has not been seriously addressed in the proposal. Employee housing should be in the valley to facilitate workers getting back and forth to work..particularly on snowy week-ends when driving is difficult. Nothing in the proposal suggests where housing could be in neighboring communities.

4. The noise and night light which would result is such a large development will impact the local community. How noise and light can be mitigated is not given in the developer's plans.

Over-all, with the amount of money that KSL is using, a lovely mountain village could be built. Putting large hotels and water slides clearly takes away from a true mountain experience.

Cc: Alex Fisch

Sally Brew
11/07/2012