Appendix B

Revised Notice of Preparation and Scoping Comments (February 2014)

Revised Notice of Preparation

REVISED NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

(STATE CLEARINGHOUSE NO. 2012102023)

Date:	February 21, 2014
To:	Agencies and Interested Parties
From:	Placer County
Subject:	**Revised Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan**
Review Period:	February 21, 2014 to March 24, 2014

Squaw Valley Real Estate, LLC (project applicant) is requesting approval of various discretionary entitlements in support of the proposed Village at Squaw Valley Specific Plan project (proposed project), located at the west end of Squaw Valley. The project is a mixed-use development that includes resort residential, commercial, and recreation uses as well as parking and other visitor amenities. Placer County (County) has determined that an environmental impact report (EIR) will be prepared for the project to satisfy the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.), and will serve as the lead agency for CEQA compliance.

PREVIOUS NOTICE OF PREPARATION AND INITIAL STUDY

On October 10, 2012, the County issued the original Notice of Preparation (NOP) for an earlier version of the Village at Squaw Valley Specific Plan. The NOP was issued in accordance with the State CEQA Guidelines (14 California Code of Regulations [CCR] Section 15082) with the intent of informing agencies and interested parties that an EIR would be prepared for the above-referenced project. In response to public and agency comments received during the scoping process as well as changing market conditions and other factors, the project has since been substantially revised by the applicant.

Overall, project development has been reduced by approximately one-third since the October 2012 NOP was released. Maximum unit counts have been reduced from 1,295 to 750, and total maximum bedrooms have been reduced from 3,238 to 1,493. The project footprint has been reduced from approximately 101 acres to approximately 94 acres (85 acres in the main Village area and approximately 9 acres referred to as the East Parcel). Additional information has also become available regarding several project components, including plans for employee housing. A separate Phase I Project component, part of the 2012 NOP, is no longer included in the proposed project and will not be part of the EIR. The project will be considered in its entirety without a separate analysis of early phases. In response to these changes, the County has prepared this revised NOP to allow for public and agency comment on the scope and content of an EIR to be prepared for the revised project. Comments provided in response to this revised NOP will be considered and addressed in the Draft EIR. Comments provided previously, in response to the original NOP, will continue to be considered in the Draft EIR and need not be repeated in response to this revised NOP.

Concurrent with the original NOP, the County provided an Initial Study to identify the project's likely environmental effects and disclose issues to be addressed in the EIR. Although the project has since changed, the County does not plan to revise the Initial Study because the project's potential environmental effects are still adequately considered, although the magnitude of some impacts may be somewhat altered and/or lessened due to the project changes (e.g., smaller project footprint). All conclusions contained in the Initial Study checklist (Chapter 2) related to whether the project may have a potentially significant impact, a less-than-significant impact, or no impact, would continue to be valid, and the same environmental issue areas identified for evaluations in the EIR would continue to be evaluated (Note that there is no longer a Phase 1 project entitlement request and therefore a project-level analysis will not be completed for this EIR).The Initial Study is available for public review at:
http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir.aspx

PURPOSE OF THIS REVISED NOTICE OF PREPARATION

The purpose of an NOP is to provide sufficient information about the revised proposed project and its potential environmental impacts to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (State CEQA Guidelines 14 CCR Section 15082[b]).

The project location, description, and potential environmental effects are summarized below. The existing Initial Study provides additional information on potential environmental impacts, as described previously.

PROJECT LOCATION

The Specific Plan area (plan area) is located within the 4,700-acre Squaw Valley (also known as Olympic Valley) in northeastern Placer County (Exhibit 1). The plan area is located approximately two miles west of State Route (SR) 89, nine miles south of the Town of Truckee, and seven miles northwest of Tahoe City.

The plan area encompasses a total of approximately 94 acres, including approximately 85 acres in the main Village area and an approximately 8.8-acre area referred to as the East Parcel (Exhibit 2). Most of the plan area has been previously developed or disturbed. The main plan area is generally bounded by Squaw Valley Road and residential development to the north; ski lifts and related ski operations to the south; lodging, single-family residences, and undisturbed areas to the west; and the meadow and golf course to the east. Additionally, the main plan area borders some existing developments on two or three sides, including the Squaw Valley Lodge and Olympic Village Inn. Access to the plan area is provided by Squaw Valley Road.

The East Parcel is located approximately 1.3 miles east of the main Village area and approximately 0.3 mile west of SR 89, northwest of the intersection of Squaw Valley Road and Tavern Circle, across from the Squaw Valley Public Services District and Fire Station (Exhibits 2 and 3).

PROJECT DESCRIPTION SUMMARY

The proposed Specific Plan is the first specific plan proposed under the *Squaw Valley General Plan and Land Use Ordinance* (SVGPLUO), which was adopted by Placer County in 1983. The Specific Plan proposes to amend the SVGPLUO to comprehensively plan development of a recreation-based, all-season, mountain resort community.

Proposed Land Uses

The Specific Plan would allow for development of resort residential, commercial, retail, and recreational uses similar to uses currently allowed under the SVGPLUO, including lodging, skier services, retail shopping, restaurants and bars, entertainment, and public and private recreational facilities.

The plan area would consist of two main zones within the Village: the Village Core, consisting of high-density, active, tourist-related mixed uses; and the Village Neighborhoods, consisting of medium-density resort residential neighborhoods and small-scale neighborhood-serving commercial uses. In addition, the plan area would include the approximately 8.8-acre East Parcel, which is planned for employee housing, off-site parking, and activities that are ancillary to the Village, such as receiving and distribution.

Table 1 identifies the development types that would be permitted in the plan area by land use designation. Exhibit 3 presents the proposed land use plan. As noted in Table 1, the Specific Plan allows for a maximum of 1,493 bedrooms (or 750 units) in the main Village area and up to 264 bedrooms (or 21 units) to accommodate employee housing on the East Parcel.

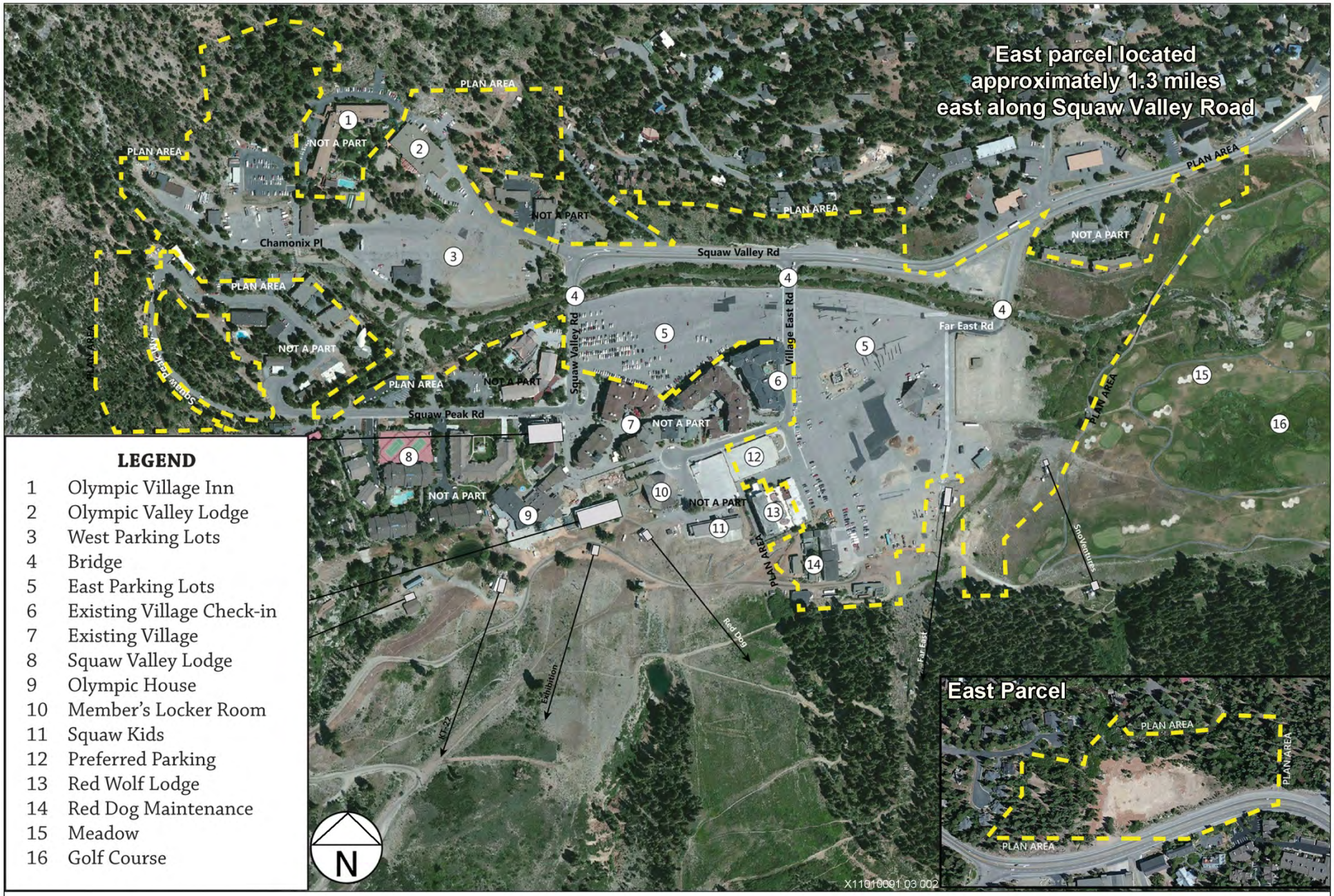
The developed character of properties in the plan area would reflect design concepts and details of traditional North American mountain architecture and utilize locally-available building materials. The maximum height of buildings in the main plan area would range from 35 to 108 feet tall, including podium parking levels. The maximum height of podium parking would be 21 feet above grade.

Exhibit 4 illustrates one scenario of how the Specific Plan could be implemented.

Source: Squaw Valley Real Estate, LLC 2014

Exhibit 1 **Regional Location**

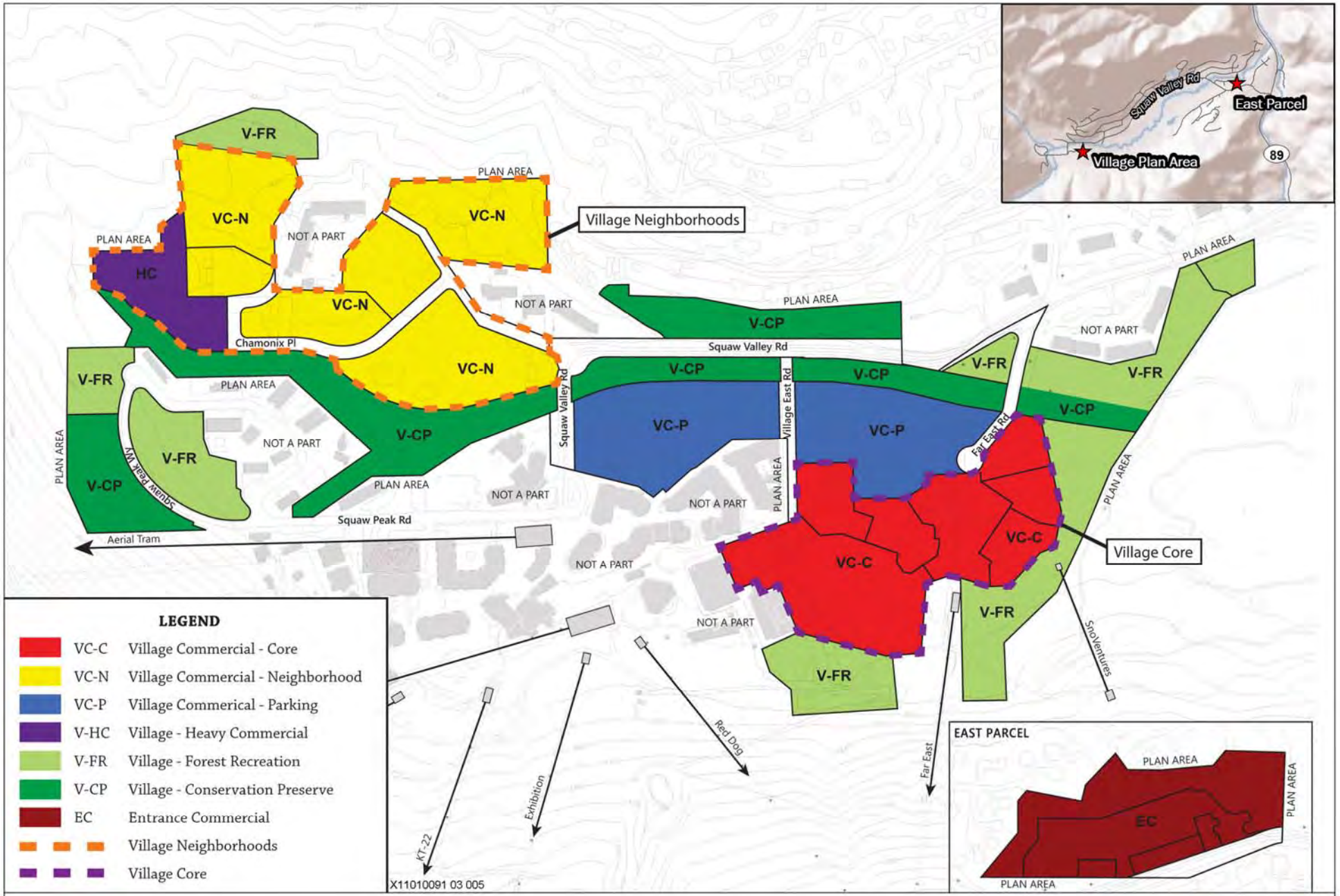
ASCENT ENVIRONMENTAL



Source: Squaw Valley Real Estate, LLC 2014; adapted by Ascent Environmental, Inc. in 2014

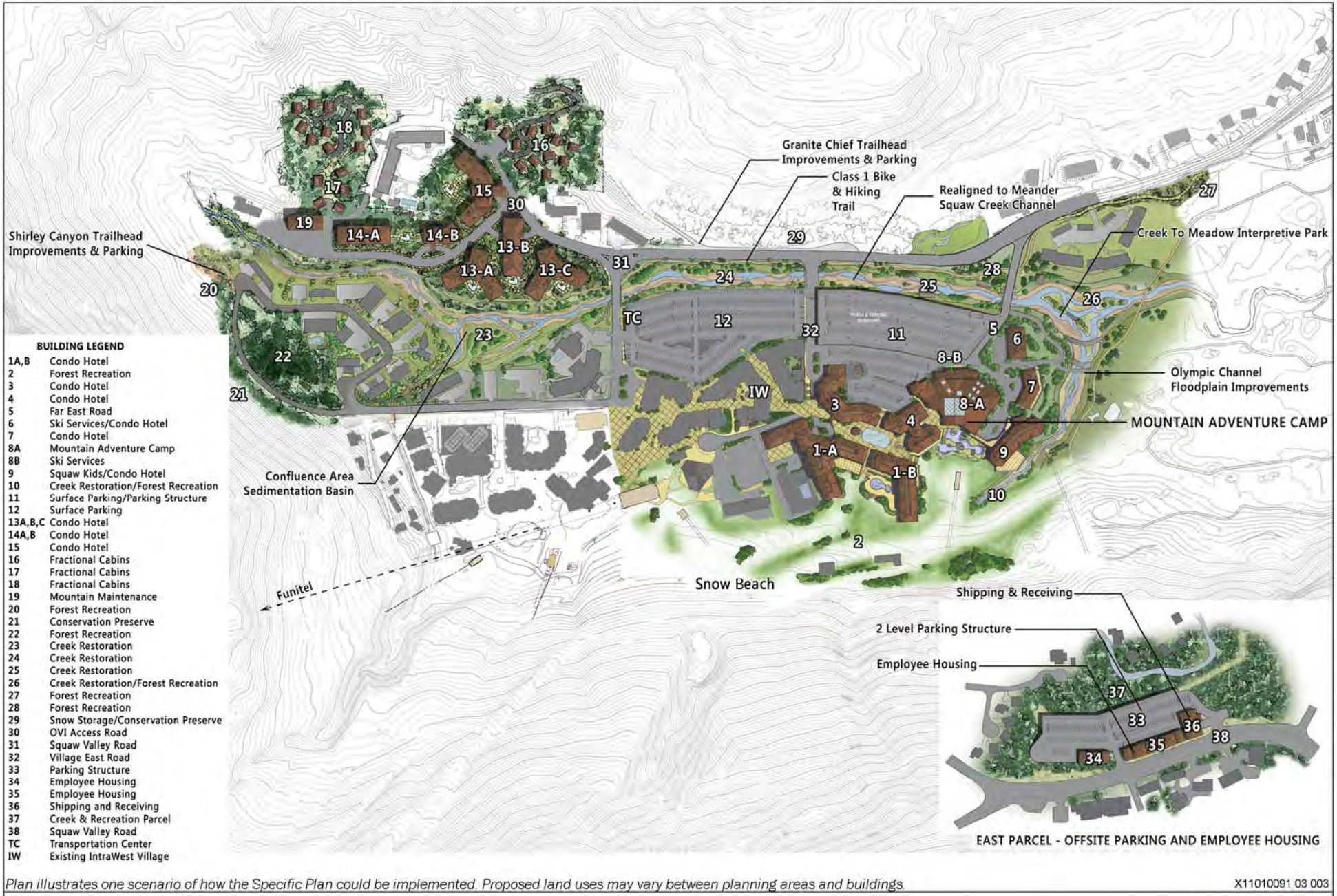
Exhibit 2

Plan Area Existing Conditions



Source: Squaw Valley Real Estate, LLC 2014; adapted by Ascent Environmental, Inc. in 2014

Exhibit 3 **Land Use**



Plan illustrates one scenario of how the Specific Plan could be implemented. Proposed land uses may vary between planning areas and buildings.

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Source: Squaw Valley Real Estate, LLC 2014; adapted by Ascent Environmental, Inc. in 2014

Exhibit 4 **Concept Plan**

Table 1 Proposed Land Uses

Land Use	Area (acres)	Maximum Units	Maximum Bedrooms	Maximum Density (br/acre)	Average Density (br/acre)	Maximum Commercial (sf)[1]	Existing Commercial to be Removed (sf)	Percent of Plan Area
Village Commercial – Core (VC-C)	13.43	431	847	105	63	221,490	70,057	17.2%
Village Commercial – Neighborhood (VC-N)	16.95	319	646	76	38	42,243	7,593	21.71%
Village Commercial – Parking (VC-P)	10.67	-	-	-	-	-	-	13.67%
Village – Heavy Commercial (V-HC)	2.85	-	-	-	-	10,000	-	3.65%
Developed Area Subtotal	**43.9**	**750**	**1,493**	**-**	**34**	**273,733**	**77,650**	**56.24%**
Village – Forest Recreation	17.34	-	-	-	-	-	-	18.5%
Village – Conservation Preserve	16.82	-	-	-	-	-	-	21.55%
Undeveloped Area Subtotal	**34.16**	**-**	**-**	**-**	**-**	**-**	**-**	**43.76%**
Entrance Commercial (East Parcel)	8.04	21	264	-	33	20,000	-	-
Roads	7.61	-	-	-	-	-	-	-
Transit Center (TC)	-	-	-	-	-	4,000	-	-
Total	**93.71**	**771[2]**	**1,757**	**-**	**19**	**297,733[2]**	**77,650**	**-**

Notes: br/acre = bedroom per acre; sf = square feet
[1] Includes replacement of existing commercial uses and maintenance facilities.
[2] Total development within the plan area shall not exceed the maximum units and commercial square footage shown.
Source: Compiled by Ascent Environmental in 2014 based on information from Squaw Valley Real Estate, LLC 2014

Notable changes from the 2012 NOP and Initial Study include the following: East Parcel (formerly Lot 4) is now included in the plan area; Mountain Adventure Camp (formerly Mountain Adventure and Aquatic Center or Grand Camp) has been reconfigured and its size reduced; the areas where formerly proposed Buildings A and O would have been located have been removed from the plan; maintenance and skier services have been distributed throughout the plan area and will no longer be housed in one all-encompassing facility (formerly Building F); all buildings, excluding the Fractional Cabins, have been reconfigured to preserve views; the Members Locker facility will be retained; and development of Olympic Valley Park has been removed from the plan. Table 2 identifies the changes from the 2012 NOP and Initial Study in unit counts and commercial square footage.

Table 2 Comparison with October 2012 NOP and Initial Study

Land Use	October 2012 NOP[1]	January 2014 VSVSP[2]	Difference
Condo-Hotel/Resort Residential Units[3]			
Units	1,295	750	**-545**
Rooms	3,238	1,493	**-1,745**
Commercial Square Footage			
Village Commercial-Core (VC-C)	356,000	221,490	**-134,510**
Village Commercial-Neighborhood (VC-N)	41,000	42,243	**1,243**
Village-Heavy Commercial	57,000	10,000	**-47,000**
Entrance Commercial	0	20,000	**20,000**
Total Commercial Square Feet	**454,000**	**293,733**	**-160,267**

Notes: VSVSP = Village at Squaw Valley Specific Plan
1. From Table 1-1, VSVSP and Phase 1 Project Initial Study, October 2012.
2. From Table 3.1, The Village at Squaw Valley Specific Plan, January 2014.
3. Does not include employee housing on East Parcel.

Parking and Circulation

The Specific Plan's roadway hierarchy and parking system would be designed to be pedestrian oriented, allowing arriving resort visitors to park quickly and stay at the resort without the need for a car. Various roadway improvements (e.g., striping, turn lanes, shoulders, bike lanes, walkways, curb and gutter, roundabouts) would be made to enhance safety, while expanding opportunities for regional and local transit use, walking, and biking. Additionally, a new Transit Center, within the main plan area, would provide a convenient transit hub for both public and private transit services.

Parking would be provided beneath the majority of lodging and residential buildings (primarily for guests/residents) and in surface parking lots (primarily for day skiers/visitors and guests of nearby lodging/residential properties). The surface parking lots would be converted to one level over grade structures (20 foot maximum) at a later time, as parking needs increased. The East Parcel parking facility will provide the key off-site parking area for employees and (as needed) by day skiers on peak ski days and for events. The East Parcel facility would have two levels over grade with a maximum height of 35 feet. The structures and their exterior surfaces will be designed to be consistent with surrounding buildings. Additional off-site parking areas would be provided on an as-needed basis and would primarily be used for employees and day skiers. Temporary parking outside the Olympic Valley may be considered, but no specific sites have been identified.

Notable changes from the 2012 NOP and Initial Study include the following: day skier surface parking lots have been retained in lieu of underground and podium parking; Chamonix Place has been rerouted; and a potential Emergency Vehicle Access (EVA) connection to the Resort at Squaw Creek is being considered. Any selected EVA route would be expected to maximize the use of existing paths, as feasible. The EVA route (if developed) would be intended for emergency vehicles and might be used for a shuttle between the Village and the Resort at Squaw Creek.

The existing Class I bicycle path located on the southern side of Squaw Valley Road east of Far East Road would be extended westward through the Village along the north side of the restored Squaw Creek (Squaw Creek restoration is described below). Multiple pedestrian and bicycle connections would be provided into the Village Core and linked to the Granite Chief and Shirley Canyon trailheads. From the Village, a series of radiating pedestrian thoroughfares and Class II bicycle paths would link the easternmost snow beach with the westernmost Village Neighborhoods and the major valley-wide bike path. Bicycle racks would be provided at three main locations throughout the Village, as well as at the Granite Chief and Shirley Canyon trailheads, and at all major lodging properties.

Public Services and Utilities

The project would require the provision of public services and utilities to provide necessary services to future tourist, resort residential, and commercial uses within the plan area. Law enforcement would continue to be provided by the Placer County Sheriff's Department and the California Highway Patrol, and the Squaw Valley Fire Department would continue to provide fire protection. If new or additional facilities are identified as being needed to provide these services (e.g., new fire station), they will be evaluated in the EIR. Electrical, solid waste, and propane service would also continue with existing providers. The following public services and utilities are described in more detail below: water supply (potable and irrigation), wastewater (collection, treatment, and disposal), storm drainage, and snow removal.

Notable changes from the 2012 NOP and Initial Study include the following: the potential to create a new water supplier (a mutual water company to be established) is being considered as an option; a new 0.7 million gallon water storage tank has been added (with the tank potentially being larger as described below); and potential methods for snow removal are being considered.

Water Supply

Potable and irrigation water is proposed to be provided either by the Squaw Valley Public Services District (SVPSD) or by a mutual water company that would be established as part of this project. A Water Supply

Assessment (WSA) will be prepared to evaluate water demand from the proposed project relative to available supply.

Water would be delivered to the plan area from strategically placed wells that would work in concert with existing wells in the Valley. Existing wells would be utilized where feasible. The number and location of wells may be influenced by whether a mutual water company is established as part of the project (which could require more new wells). Water would be distributed within the plan area via looped pipelines generally located within the roadway system and pedestrian network. The project is anticipated to include a new 0.7 million gallon water storage tank located adjacent to an existing 1.0 million gallon tank just north of the plan area. These two tanks are anticipated to provide sufficient pressure via gravity flow and capacity to store water for peak day demand plus fire flows for the plan area and existing development currently served by the 1.0 million gallon tank. If the two tanks cannot be connected to work in unison, the new tank may need to have a capacity up to 1.5 million gallons.

Wastewater

SVPSD owns and operates the wastewater collection system that serves Squaw Valley. The project would connect to existing SVPSD transmission lines. The Tahoe Truckee Sanitation Agency (TTSA) would provide wastewater treatment at its existing water reclamation plant, located in Nevada County along the Truckee River. New gravity wastewater lines would be installed to serve the plan area. These pipelines would generally flow from west to east, and would tie into the SVPSD main trunk sewer system, which extends from the plan area, crosses under SR 89 and the Truckee River, and discharges into the TTSA Truckee River Interceptor located along the Truckee River to the reclamation plant.

Storm Drainage

On-site drainage improvements would consist of a combination of conventional subsurface and surface drainage systems and construction of pipe and open channel conveyance systems. Stormwater would be discharged at or near existing outfalls into the Squaw Creek corridor. Vegetated swales, soft armoring, mechanical storm filters, structural interceptors, and other best management practices and/or low impact development (LID) features would be utilized at pipe outfalls or other appropriate locations for water quality management, and to convey stormwater runoff to receiving waters while minimizing impacts to open space resources.

Snow Removal

Snow removal in the Plan Area would continue to use traditional methods of plowing, blowing, and piling/storing. Snow storage bunkers may also be constructed within the podiums of new buildings to store snow until it can be moved to another location. Active melting of snow in the bunkers using various heat sources (e.g., propane, “waste” heat from resort activities) is also being considered.

Village Open Space Network

A network of natural and pedestrian oriented open space areas would weave through the plan area, providing views of the surrounding mountainsides, forest, and meadow. The basic components of this network include:

- **Primary pedestrian corridors** – The main pathways that interconnect all neighborhoods within the Village;
- **Secondary pedestrian corridors** – The smaller passageways, alleys, and lanes within each Village neighborhood;
- **Pedestrian parking lot corridors** – Pathways that provide safe pedestrian circulation between the surface parking lots and the Village;
- **Gathering spaces** – The snow beach (southern edge of plan area), plazas, courtyards, and event venue spaces along the pedestrian corridors;

- **Landscape Corridors and Buffers** – Landscaped open spaces within neighborhoods that provide visual buffers and links to the surrounding forested areas; and

- **The Squaw Creek Preservation Corridor** – A generous open space corridor set aside for future enhancement and restoration activities (see description below).

There are no changes to the Village open space network from that described in the 2012 NOP and Initial Study, other than those reflective of the change in the project boundaries.

Squaw Creek Restoration

The Specific Plan designates the Squaw Creek corridor as "Village – Conservation Preserve" (Exhibit 3). A 150 to 200-foot-wide corridor would be provided for the length of the creek through the plan area, and would allow for maintenance and/or improvement of riparian functions and values, which include groundwater recharge; sediment deposition; terrestrial, avian, and aquatic habitat; and flood protection. Additionally, a Class I bicycle and walking trail would be installed along the corridor, as well as interpretative signage and viewing areas.

The Specific Plan includes establishment of a sediment management and removal program at the confluence of the North and South Forks of Squaw Creek. Sediment removal would likely occur every 2 to 5 years, with the goals of reducing sediment supply to downstream areas and maintaining flood conveyance. In addition, the Conservation Preserve would be widest at the downstream (east) end of the plan area. This could include land north of Squaw Creek (outside of the plan area) which is now owned by Squaw Valley (formerly owned by Poulsen Land Company). The proposed width would allow for floodplain restoration, sediment deposition, and active sediment management/removal at the confluence of the Olympic Channel and Squaw Creek. Grade control structures and oxbow depression features would provide water retention, groundwater recharge, and collection and management of coarse sediment. Floodplain wetlands would be created, enhancing functionality and acreage of wetlands, and helping to mitigate for potential impacts to wetlands and waters of the United States and State of California associated with implementation of the Specific Plan.

There are no changes to the Village open space network from that described in the 2012 NOP and Initial Study.

Project Phasing

The Specific Plan would be developed over approximately 20–25 years with construction proposed to begin in 2016. Development sequencing may conceptually be expressed in two or more phases, but portions of each phase could occur concurrently, with the development of particular facilities and project features primarily being driven by market demands.

Notable changes from the 2012 NOP and Initial Study include the following: the number of project phases has been reduced from four to likely two phases, and the number of years over which project development would occur has been increased from 12–15 years to 20–25 years.

POTENTIAL ENVIRONMENTAL IMPACTS

The EIR will describe the direct and indirect potentially significant and significant environmental impacts of the project. Based on the results of the Initial Study prepared for the project (available on the County's website), the County has determined that the EIR will result in potentially significant environmental impacts in the following topic areas, which will be further evaluated in the EIR:

- Land Use and Forest Resources;
- Population, Employment, and Housing;
- Biological Resources;
- Cultural Resources;
- Visual Resources;
- Transportation and Circulation;

- Air Quality;
- Noise;
- Geology, Soils, and Seismicity;
- Hydrology and Water Quality;
- Public Services and Utilities;
- Hazardous Materials and Hazards; and
- Greenhouse Gases and Climate Change.

The following is a summary of environmental effects identified for each of these topic areas.

Land Use and Forest Resources

The proposed land use plan could result in inconsistencies with the *Placer County General Plan* and the SVGLUO, including potential development of incompatible land uses or land use conflicts. These issues will be evaluated in the EIR. Some tree removal would be required to construct the proposed Specific Plan. Moreover, the project includes rezoning portions of the plan area from Forest Recreation to Village Commercial and rezoning other portions of the plan area from Village Commercial to Forest Recreation. These issues will be evaluated in the EIR.

Population, Employment, and Housing

The project would increase the population of Squaw Valley, although ownership within the plan area would be fractional so the population would be essentially transient. However, the project would require additional employees, necessitating construction of employee housing, within the Olympic Valley (on East Parcel) and/or in nearby communities. Impacts associated with population and employment increases, including the potential for displacement of existing employee housing will be evaluated in the EIR.

Biological Resources

Although most of the plan area is already developed with parking lots and scattered buildings, some undeveloped area is also proposed for development. Special-status plant or wildlife species could potentially occur in the plan area. Squaw Creek flows in a west to east direction through the plan area and could provide habitat for various special-status plant and wildlife species, and may also provide a wildlife movement corridor. Additionally, the surrounding forested mountain areas—while disturbed due to residential development and recreational use—could provide habitat for special-status plant and wildlife species, and could be indirectly affected by project implementation (e.g., disturbance of nesting birds during construction). Therefore, project implementation could result in disturbance or take of special-status species or disturbance or removal of suitable habitat for these species.

Waters of the U.S. identified in the plan area include wetland swale, seep, wet meadow, perennial stream, intermittent stream, and ephemeral stream. The project could potentially remove, fill, or hydrologically interrupt wetlands identified in the plan area.

Placer County's Tree Preservation Ordinance (Placer County Code, Article 12.20) is applicable to all native, landmark trees, riparian zone trees, and certain commercial firewood operations. In accordance with the Tree Preservation Ordinance, a discretionary project shall evaluate the potential impacts to all protected tress sized 6-inches diameter at breast height or larger as part of the development review process. A tree survey conducted for the project indicated the presence of approximately 800 trees in the Village areas and approximately 350 trees on the East Parcel. Build-out of the Specific Plan would include removal of some of these trees, although the exact number is not yet known. These issues will be evaluated in the EIR.

Cultural Resources

The project area is considered archaeologically sensitive, and at least one recorded prehistoric site exists within the vicinity of the East Parcel. An archaeologist conducted a field survey of the entire plan area, and found no prehistoric or historic archaeological resources that would be considered significant. Nonetheless, it is possible that subsurface cultural resources could be located in the plan area, which could be undisturbed beneath the pavement and buildings that cover most of the plan area. Removal of the existing

surface material during grading and excavation activities could damage potential subsurface archaeological resources.

Additionally, three buildings located in the plan area were constructed for the 1960 Winter Olympics and could be considered historical resources; two of the three buildings are proposed for demolition, the third building (the California Spectators' Center) would be retained and would continue to serve as the Members Locker Room. This represents a notable change from the 2012 NOP and Initial Study, which described all three buildings as being proposed for demolition. These issues will be evaluated in the EIR.

Visual Resources

The project area is located within a scenic alpine setting, with steep mountains, jagged peaks, meadows, and creeks surrounding a largely paved project site. The project includes development of a Village Core, with maximum building heights ranging from 35 to 108 feet tall and other less intensive development that would potentially alter the viewshed. The project may result in adverse effects to scenic vistas, particularly as viewed from Squaw Valley Road (a County-designated scenic roadway) and from surrounding residential areas. In addition, the project would include new light sources that could increase light and glare and could adversely affect nighttime views, increasing "sky-glow" and disturbing residents of adjacent areas. These issues will be evaluated in the EIR.

Transportation and Circulation

Project construction would result in construction worker commute trips and haul truck trips (for delivery and transport of materials and equipment) to and from the project area, resulting in increased traffic levels on local roadways. Traffic associated with project operation would include the trips generated by new employees and guests, thereby increasing existing traffic levels compared to existing conditions. Similar to project construction, long-term project operation could result in adverse roadway conditions, including decreased level of service, an increase in traffic hazards, roadway degradation, and reduced emergency access, due to increase in traffic volumes. A detailed traffic analysis that evaluates local and more regional transportation impacts will be performed for the project, and this issue will be evaluated in the EIR. Impacts associated with potential conflicts with alternate transportation modes will also be evaluated in the EIR.

Air Quality

During project construction, criteria air pollutant emissions would be temporarily and intermittently generated. Project construction of this scale could potentially conflict with Placer County Air Pollution Control District's Air Quality Attainment Plan (AQAP). Project operation would result in air pollutant emissions from project-generated motor vehicle trips, area sources such as propane gas consumption, and stationary sources. Project operation could also potentially conflict with the AQAP. Construction- and operations-related emissions could adversely affect sensitive receptors in the vicinity. Nearby sensitive receptors include residences and a school (Squaw Valley Academy). These issues will be evaluated in the EIR.

Noise

Construction-related noise sources would include both mobile and stationary on-site equipment (e.g., bulldozers, backhoes, front end loaders, graders, pavers, generators, and compressors), as well as impact tools. Construction would also generate truck trips associated with the delivery of building supplies and hauling away of excess fill and construction debris. Construction noise levels could potentially exceed the daytime hourly and maximum standard of 55 and 70 A-weighted sound levels (dBA), respectively, and/or the nighttime performance standards defined by the Placer County Code. Project operation would result in additional guests and employees and associated daily vehicle trips. Additionally, the project includes outdoor performance venues, establishment of the mountain maintenance facility, and development of the East Parcel, all of which could generate noise that could disturb nearby sensitive land uses. The project's long-term operations could result in the exposure of people to additional long-term operational noise levels, and additional noise may exceed the applicable County noise standards. These issues will be evaluated in the EIR.

Geology, Soils, and Seismicity

Several unnamed fault traces run through Squaw Valley. The alignments of these faults have not been fully determined, but one or more might traverse the plan area. If an active fault does exist within the plan area, it could potentially rupture, causing damage to buildings in the immediate vicinity. There are also faults located throughout the Lake Tahoe region. If an earthquake occurred on one of these faults, it could expose people or structures to potential substantial adverse effects, including ground shaking, ground failure, and liquefaction. The project site could also include unstable or expansive soil units that could affect structures. Depending on wind and rain conditions, grading activities and improvements could result in the potential for erosion and sedimentation of site soils both on- and offsite. Finally, portions of the plan area are located within the run-out areas of some avalanche zones and could include construction of new buildings and uses within potential avalanche hazard areas. These impacts will be evaluated further in the EIR.

Hydrology and Water Quality

The plan area drains into Squaw Creek. The Creek runs west to east through the plan area in an engineered channel before flowing into a meadow area/golf course (Resort at Squaw Creek Golf Course) to the east of the plan area, and eventually flows into the Truckee River. The creek is degraded by excessive sediment loads. Construction activities could result in soil erosion, siltation, or flooding. Specifically, construction activities such as grading could result in disturbance of soils and sediments that could be carried into natural water bodies (including Squaw Creek) during storm events. Further, accidental discharges of construction-related fuels, oils, hydraulic fluid, and other hazardous substances could contaminate stormwater flows or increase siltation in nearby water bodies, resulting in a reduction in stormwater quality on or downstream of the plan area. New impervious surfaces that would be constructed as part of the project could increase the volume of runoff coming from the plan area. Runoff could contain oils, grease, fuel, sediments, brake dust, and other potential water pollutants. During storm events, these pollutants could be carried to downstream receiving waters of Squaw Creek and eventually the Truckee River. Use of groundwater to provide water supply for the project could affect water levels within Squaw Creek. Finally, the project proposes to incorporate a grey water system to collect and treat water from baths, showers, hand basins, and washing machines for landscape irrigation use and for flushing toilets to the extent feasible. The EIR will evaluate these issues, as well as the potential to place housing or other structures within a 100-year flood hazard area, and the potential impacts associated with proposed creek restoration activities.

Public Services and Utilities

The project would increase the demand for public services, including fire and police protection services. The EIR will assess the degree to which affected public service providers can adequately serve the project and the environmental effects of additional public services facilities (e.g., fire station) if they are needed. Water supply and sanitary sewer disposal demands will be quantified for the project to determine utility system capacities and evaluate the effect of development on current service levels. A WSA will be prepared to determine the project's water demand and whether available supplies are sufficient to meet project demands. These issues will be evaluated further in the EIR.

Hazardous Materials and Hazards

The plan area is identified by the U.S. Environmental Protection Agency (U.S. EPA) as a small generator of hazardous waste (U.S. EPA 2012). Past operations at the plan area could have resulted in elevated concentrations of hazardous constituents, such as petroleum hydrocarbons, which have been detected in some surface soils and groundwater within the plan area. Several underground storage tanks are located in the plan area. Hazardous materials, including various products such as paints, solvents, glues, and cements, would be stored, used, and transported in varying amounts during construction and long-term project operation. In addition, the project could generate substantial traffic (both during construction and long-term project operation) and could result in construction-related road closures. For this reason, the project could interfere with an adopted emergency response plan or evacuation plan, such as the Squaw Valley Fire Department's *Emergency Evacuation Plan* (2012). Furthermore, the project would result in the placement of housing and other structures that would contain substantial numbers of people in a wildland area, thereby potentially exposing people and structures to a risk of wildland fire. These issues will be evaluated in the EIR.

Greenhouse Gases and Climate Change

Greenhouse gas (GHG) emissions generated by the project during construction would predominantly be in the form of carbon dioxide (CO_2). Emissions would be associated with mobile-source exhaust from construction worker commute trips, truck haul trips, and equipment used in the plan area (e.g., excavators, graders). Project operation would add additional mobile sources of GHGs associated with an increased number of employees and guests. The project would also result in GHG emissions from area sources such as propane consumption (for heating and cooking) and off-site emissions from utility providers. These issues will be evaluated in the EIR.

Cumulative Impacts

Project implementation could potentially result in significant impacts to the above resource areas. When taken together with the effects of past projects, other current projects, and probable future projects, the proposed project's contribution to the overall cumulative effect of all these activities could be considerable. These issues will be evaluated in the EIR.

ALTERNATIVES TO BE EVALUATED IN THE EIR

In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the proposed project that are capable of meeting most of the projects' objectives, and would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No-Project Alternative and will also identify the environmentally superior alternative.

POTENTIAL PERMITS AND APPROVALS REQUESTED

The project applicant requests adoption of a Specific Plan. The proposed Specific Plan includes a land use concept plan, development standards, and design guidelines for development of the Specific Plan area. Specifically, the project applicant is requesting the following actions and planning entitlements from Placer County:

- Certification of a Final Environmental Impact Report;
- Amendment of the *Placer County General Plan* (1994);
- Amendment of the *Squaw Valley General Plan and Land Use Ordinance* (1983);
- Rezone of the proposed Specific Plan area to include the Specific Plan (SPL) zoning designation;
- Adoption of the proposed Specific Plan;
- Approval of a Development Agreement; and
- Approval of a Large-lot Tentative Subdivision Map.

In addition, the project will require permit approvals from Responsible Agencies such as the Lahontan Regional Water Quality Control Board and the California Department of Fish and Wildlife. Restoration of Squaw Creek and conversion of wetlands would require federal agency permit approval.

DOCUMENTS AVAILABLE FOR PUBLIC REVIEW

This revised NOP is available for public review at the following locations:

Tahoe City Library
740 N. Lake Blvd
Tahoe City, CA 96145

Truckee Library
10031 Levon Avenue
Truckee, CA 96161

This revised NOP is also available for public review at:
http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir.aspx

In addition, project information including a PDF download of the complete Specific Plan and contact link is available for review at:
http://www.placer.ca.gov/departments/communitydevelopment/planning/villageatsquawvalleyspecificplan

PROVIDING COMMENTS

Agencies and interested parties may provide the County with written comments on topics to be addressed in the EIR for the project. Because of time limits mandated by State law, comments should be provided no later than 5:00 PM on **March 24, 2014**. Please send all comments to:

Placer County, Planning Services Division
3091 County Center Drive Suite 190
Auburn, CA 95603
Attention: Maywan Krach, Community Development Technician
Telephone: (530) 745-3132 Fax: (530) 745-3080
Email: cdraecs@placer.ca.gov

Agencies that will need to use the EIR when considering permits or other project approvals should provide the name of a contact person. Comments provided by email should include "Village at Squaw Valley Specific Plan Project NOP Scoping Comment" in the subject line, and the name and physical address of the commenter in the body of the email.

All comments on environmental issues received during the public comment period will be considered and addressed in the Draft EIR. Comments provided in response to the original NOP distributed October 10, 2012 will also be considered and addressed in the Draft EIR. Comments provided previously need not be repeated.

PUBLIC SCOPING MEETING

A public scoping meeting was held on November 1, 2012 at The Resort at Squaw Creek to inform interested parties about the project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. A new public scoping meeting will not be held.

REFERENCES

Placer County. 1994 (August 16). *Placer County General Plan*. Placer County, CA.

———. 1983. *Squaw Valley General Plan and Land Use Ordinance*. Adopted June 14 and August 30, 1983; reflects modifications through 2006.

Squaw Valley Fire Department. 2012. *Emergency Evacuation Plan*. Available: http://www.svpsd.org/fire/images/evacuation/docs/Evacuation%20Plan.pdf. Accessed July 24, 2012.

Squaw Valley Real Estate, LLC. 2014 (January). *The Village at Squaw Valley Specific Plan, Draft*. Prepared for Placer County.

U.S. Environmental Protection Agency. 2012. Enviromapper for Envirofacts Database Search. Available: http://www.epa.gov/emefdata/em4ef.html?minx=-121.26709&miny=38.74337&maxx=-120.16846&maxy=39.38314&pText=placer%20county. Accessed March 12, 2012.

U.S. EPA. *See* U.S. Environmental Protection Agency.

NOP Comments

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

Memorandum

Date: February 27, 2014

To: All Reviewing Agencies

From: Scott Morgan, Director

Re: SCH # 2012102023

Village at Squaw Valley Specific Plan and Phase I Project

On February 21st, 2014, the State Clearinghouse submitted the above Notice of Preparation to your agency for review. Per Lead Agency, please note that the project title on the **acknowledgement letter** from the State Clearinghouse was incorrect.

The correct project title is:

Village at Squaw Valley Specific Plan

We apologize for this error and request that you note the above information for your files. All other project information remains the same.

RECEIVED
MAR 03 2014
PLANNING DEPT.

cc: Alex Fisch
Placer County, Planning Services Division
3091 County Center Drive
Auburn, CA 95603

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

NOP Distribution List

SCH# 2012102023

County: Placer

Resources Agency
- Resources Agency — Nadell Gayou
- Dept. of Boating & Waterways — Nicole Wong
- California Coastal Commission — Elizabeth A. Fuchs
- Colorado River Board — Tamya Trujillo
- Dept. of Conservation — Elizabeth Carpenter
- California Energy Commission — Eric Knight
- Cal Fire — Dan Foster
- Central Valley Flood Protection Board — James Herota
- Office of Historic Preservation — Ron Parsons
- Dept of Parks & Recreation — Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery — Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm. — Steve McAdam
- Dept. of Water Resources — Resources Agency — Nadell Gayou

Fish and Game
- Depart. of Fish & Wildlife — Scott Flint — Environmental Services Division
- Fish & Wildlife Region 1 — Donald Koch
- Fish & Wildlife Region 1E — Laurie Harnsberger
- Fish & Wildlife Region 2 — Jeff Drongesen
- Fish & Wildlife Region 3 — Charles Armor
- Fish & Wildlife Region 4 — Julie Vance
- Fish & Wildlife Region 5 — Leslie Newton-Reed — Habitat Conservation Program
- Fish & Wildlife Region 6 — Gabrina Gatchel — Habitat Conservation Program
- Fish & Wildlife Region 6 I/M — Heidi Sickler — Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M — George Isaac — Marine Region

Other Departments
- Food & Agriculture — Sandra Schubert — Dept. of Food and Agriculture
- Depart. of General Services — Public School Construction
- Dept. of General Services — Anna Garbeff — Environmental Services Section
- Dept. of Public Health — Jeffery Worth — Dept. of Health/Drinking Water
- Delta Stewardship Council — Kevan Samsam

Independent Commissions,Boards
- Delta Protection Commission — Michael Machado
- Cal EMA (Emergency Management Agency) — Dennis Castrillo
- Native American Heritage Comm. — Debbie Treadway
- Public Utilities Commission — Leo Wong
- Santa Monica Bay Restoration — Guangyu Wang
- State Lands Commission — Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA) — Cherry Jacques

Business, Trans & Housing
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- Caltrans - Planning — Terri Pencovic
- California Highway Patrol — Suzann Ikeuchi — Office of Special Projects
- Housing & Community Development — CEQA Coordinator — Housing Policy Division

Dept of Transportation
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- Caltrans, District 3 — Gary Arnold
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- Caltrans, District 7 — Dianna Watson
- Caltrans, District 8 — Dan Kopulsky
- Caltrans, District 9 — Gayle Rosander
- Caltrans, District 10 — Tom Dumas
- Caltrans, District 11 — Jacob Armstrong
- Caltrans, District 12 — Maureen El Harake

Cal EPA

Air Resources Board
- All Projects — CEQA Coordinator
- Transportation Projects — Nesamani Kalandiyur
- Industrial Projects — Mike Tollstrup

- State Water Resources Control Board — Regional Programs Unit — Division of Financial Assistance
- State Water Resources Control Board — Student Intern, 401 Water Quality Certification Unit — Division of Water Quality
- State Water Resouces Control Board — Phil Crader — Division of Water Rights
- Dept. of Toxic Substances Control — CEQA Tracking Center
- Department of Pesticide Regulation — CEQA Coordinator

Regional Water Quality Control Board (RWQCB)
- RWQCB 1 — Cathleen Hudson — North Coast Region (1)
- RWQCB 2 — Environmental Document Coordinator — San Francisco Bay Region (2)
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- RWQCB 7 — Colorado River Basin Region (7)
- RWQCB 8 — Santa Ana Region (8)
- RWQCB 9 — San Diego Region (9)

- Other _____
- _____
- _____
- _____
- Conservancy

Last Updated 1/29/2014

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

Notice of Preparation

February 21, 2014

To: Reviewing Agencies

Re: Village at Squaw Valley Specific Plan and Phase I Project
SCH# 2012102023

Attached for your review and comment is the Notice of Preparation (NOP) for the Village at Squaw Valley Specific Plan and Phase I Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

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

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
FEB 26 2014
PLANNING DEPT.

Attachments
cc: Lead Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2012102023
Project Title Village at Squaw Valley Specific Plan and Phase I Project
Lead Agency Placer County

Type NOP Notice of Preparation
Description The Specific Plan proposes to amend the existing Squaw Valley General Plan and Land Use Ordinance (adopted in 1983) to comprehensively plan development of a recreation-based, all-season, resort community consisting of up to 750 fractional ownership resort residential and guest accommodation units. Other proposed land uses would include commercial, retail, and recreational uses similar to uses currently allowed as well as parking and other visitor amenities. The project would be developed over approximately 20-25 years with construction proposed to begin in 2016.

Lead Agency Contact

Name Alex Fisch
Agency Placer County, Planning Services Division
Phone (530) 745-3081 **Fax**
email
Address 3091 County Center Drive
City Auburn **State** CA **Zip** 95603

Project Location

County Placer
City Olympic Valley
Region
Cross Streets Squaw Valley Road
Lat / Long 39° 11' 50" N / 120° 14' 07" W
Parcel No. Multiple
Township 16N **Range** 16E **Section** 32NW **Base** CA21

Proximity to:

Highways Hwy 89
Airports
Railways
Waterways Squaw Creek, Truckee River
Schools Squaw Valley Academy
Land Use Low Density & High Density Residential, Heavy Commercial, Village Commercial, Forest Recreation, Conservation Preserve

Project Issues Agricultural Land; Schools/Universities; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Forest Land/Fire Hazard; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Air Quality

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 2; Office of Emergency Services, California; Native American Heritage Commission; Tahoe Regional Planning Agency; Department of Housing and Community Development; Caltrans, District 3 S; Air Resources Board; Regional Water Quality Control Bd., Region 6 (So Lake Tahoe)

Date Received 02/21/2014 **Start of Review** 02/21/2014 **End of Review** 03/24/2014

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19
SACRAMENTO, CA 95833
PHONE (916) 274-0638
FAX (916) 263-1796
TTY 711

Flex your power!
Be energy efficient!

March 24, 2014

032014-PLA-0010
PSPA 20110385
SCH# 2012102023

Alex Fisch, Senior Planner
County of Placer
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, California 95603

Village at Squaw Valley Specific Plan - Notice of Preparation (NOP)

Dear Mr. Fisch:

Thank you for including the California Department of Transportation (Caltrans) in the NOP review process for the Village at Squaw Valley Specific Plan NOP. The Village at Squaw Valley Specific Plan is located within the 4,700-acre Squaw Valley (also known as Olympic Valley) in northeastern Placer County. The Specific Plan is the first specific plan proposed under the *Squaw Valley General Plan and Land Use Ordinance* (SVGPLUO), which was adopted by Placer County in 1983. On October 10, 2012, the County issued the original Notice of Preparation (NOP) for an earlier version of the project (then called the "Village at Squaw Valley Specific Plan Phase 1"), which Caltrans reviewed. Since then the project has been reduced by approximately one-third, and currently proposes to construct 750 new residential units with a maximum bedroom count of 1,493, and 293,733 square feet of new commercial space (see page 7 of the NOP). The Specific Plan encompasses a project footprint of 94 acres (85 acres in the main Village area and approximately 9 acres referred to as the East Parcel). The plan area is located approximately two miles west of State Route (SR) 89, nine miles south of the Town of Truckee, and seven miles northwest of Tahoe City. The project would be developed over approximately 20-25 years with construction proposed to begin in 2016. The following comments are based on the NOP received.

Traffic Impact Study

Based on the project location and anticipated trip generation, there will be additional trips on SR 89 and other highways in the region. Therefore, a TIS is required to assess the impacts of this project on the adjacent road network, with specific attention to regional impacts to the State Highway System. We recommend using Caltrans' *Guide for the Preparation of Traffic Impact Studies* (*TIS Guide*) for determining which scenarios and methodologies to use in the analysis. It is available at the following website address:

"Caltrans improves mobility across California"

NOP Distribution List SCH# 2012102023

County: Placer

Resources Agency
- ☐ Resources Agency — Nadell Gayou
- ☐ Depart. of Boating & Waterways — Nicole Wong
- ☐ California Coastal Commission — Elizabeth A. Fuchs
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- ☐ Dept. of Conservation — Elizabeth Carpenter
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- ☐ S.F. Bay Conservation & Dev't. Comm. — Steve McAdam
- ☒ Dept. of Water Resources — Agency Nadell Gayou
- ☐ Delta Stewardship Council — Kevan Samsam

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- ☐ Fish & Wildlife Region 1E — Laurie Harnsberger
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- ☐ Fish & Wildlife Region 6 — Gabrina Gatchel, Habitat Conservation Program
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- ☐ Dept. of Fish & Wildlife M — George Isaac, Marine Region

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- ☐ Dept. of General Services — Anna Garbeff, Environmental Services Section
- ☐ Dept. of Public Health — Jeffery Worth, Dept. of Health/Drinking Water
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- ☐ Public Utilities Commission — Leo Wong
- ☐ Santa Monica Bay Restoration — Guangyu Wang
- ☐ State Lands Commission — Jennifer Deleong
- ☒ Tahoe Regional Planning Agency (TRPA) — Cherry Jacques

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- ☐ California Highway Patrol — Suzann Ikeuchi, Office of Special Projects
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- ☐ Industrial Projects — Mike Tollstrup
- ☐ State Water Resources Control Board — Regional Programs Unit, Division of Financial Assistance
- ☐ State Water Resources Control Board — Student Intern, 401 Water Quality Certification Unit, Division of Water Quality
- ☐ State Water Resources Control Board — Phil Crader, Division of Water Rights
- ☐ Dept. of Toxic Substances Control — CEQA Tracking Center
- ☐ Department of Pesticide Regulation — CEQA Coordinator
- ☐ Other _____
- ☐ _____
- ☐ _____
- ☐ Conservancy

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- ☐ RWQCB 1 — Cathleen Hudson, North Coast Region (1)
- ☐ RWQCB 2 — Environmental Document Coordinator, San Francisco Bay Region (2)
- ☐ RWQCB 3 — Central Coast Region (3)
- ☐ RWQCB 4 — Teresa Rodgers, Los Angeles Region (4)
- ☐ RWQCB 5S — Central Valley Region (5)
- ☐ RWQCB 5F — Central Valley Region (5), Fresno Branch Office
- ☐ RWQCB 5R — Central Valley Region (5), Redding Branch Office
- ☒ RWQCB 6 — Lahontan Region (6)
- ☐ RWQCB 6V — Lahontan Region (6), Victorville Branch Office
- ☐ RWQCB 7 — Colorado River Basin Region (7)
- ☐ RWQCB 8 — Santa Ana Region (8)
- ☐ RWQCB 9 — San Diego Region (9)

Last Updated 1/29/2014

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf.

We request an opportunity to review the scope of the TIS before work begins.

The TIS should include analysis of Highway 89 from Donner Pass Road to Highway 28, and should include the following intersections:

- Highway 89 /Deerfield Drive
- Highway 89 /West River Street
- Highway 89 /Alpine Meadows Road
- Highway 89 /Squaw Valley Road
- Highway 89 /Highway 28

Please include analysis of project effects on existing traffic conditions, and potential cumulative traffic conditions. The effects of traffic demand management measures (e.g. staggered check in/checkouts, traffic flagging, etc.) and reduced flows due to upstream congestion should be documented and included in the analysis.

Please also consider including the following analysis in the TIS, which is consistent with analysis standards used in the Tahoe Basin:

- Vehicle Miles Traveled (VMT) analysis
- A Level of Service (LOS) analysis standard of 4 hours of LOS E per day (maximum) as a definition of congestion in this recreational area

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes and documents related to this development.

If you have any questions regarding these comments or require additional information, please contact Jeffrey Morneau, Intergovernmental Review Coordinator for Placer County at (916) 274-0679 or by email at: jeffrey.morneau@dot.ca.gov.

Sincerely,

MARLO TINNEY
Chief, Office of Transportation Planning – East

Cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

STATE OF CALIFORNIA—THE RESOURCES AGENCY EDMUND G. BROWN Jr., *Governor*

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
13760 Lincoln Way
AUBURN, CA 95603
(530) 889-0111
Website: www.fire.ca.gov

March 3, 2014

TO: Maywan Krach
Placer County, Planning Services Division
3091 County Center Drive
Auburn, CA 95603

RECEIVED
MAR 05 2014
ENVIRONMENTAL COORDINATION SERVICES

RE: Village at Squaw Valley SCH# 2012102023

This project will require a Timberland Conversion and Timber Harvest Plan as per the following:

California Code of Regulations, per section 1103, and Public Resources Code 4581 requires a Timberland Conversion Permit and/or Timber Harvest Plan be filed with the California Department of Forestry and Fire Protection if the project involves the removal of a crop of trees of commercial species (regardless of size of trees or if trees are commercially harvested).

The Timberland Conversion Permit shall address the following:

a. The decrease in timber base in the county as a result of the project.
b. The cover type, including commercial species, density, age, and size composition affected by the project.
c. The ground slopes and aspects of the area affected by the project.
d. The soil types affected by the project.
e. Any significant problems that may affect the conversion.

If you require further clarification, please contact Forester Jeff Dowling at (530) 587-8926.

Sincerely,

Brad Harris
CAL FIRE
Unit Chief

Jeff Dowling
Truckee Area Forester

jd

STATE OF CALIFORNIA — Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471

February 25, 2014

Michael J. Johnson, AICP
Agency Director
Community Development Resource Agency
County of Placer

Sent by Fax: (530) 745-3080
Number of Pages: 2

RE: SCH# 2012102023, Village at Squaw Valley Specific Plan, Placer County

Dear Mr. Johnson:

Government Code §65352.3 requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting, and/or mitigating impacts to cultural places in creating or amending general plans, including specific plans. Attached is the tribe with traditional lands or cultural places located within the boundaries of the above project.

As a part of consultation, the NAHC recommends that local governments conduct record searches through the NAHC and California Historic Resources Information System (CHRIS) to determine if any cultural places are located within the area(s) affected by the proposed action. A *Sacred Lands File* search was completed with negative results. However, local governments should be aware that records maintained by the NAHC and CHRIS are not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a cultural place.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: rw_nahc@pacbell.net.

Sincerely,

Rob Wood
Associate Government Program Analyst

CC: State Clearinghouse

Native American Tribal Consultation List
Placer County
February 25, 2014

Washoe Tribe of Nevada and California
Darrel Kizer, Chairperson
919 Highway 395 South Washoe
Gardnerville , NV 89410
ktrovato@washoetribe.us
775-265-4191

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65352.3.
Village at Squaw Valley Specific Plan (SCH# 2012102003)

SQUAW VALLEY
PUBLIC SERVICE DISTRICT

March 24, 2014

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: Comments on the Revised NOP of a Draft EIR for the Proposed Village at Squaw Valley Specific Plan

Dear Alex,

The District reviewed the *Revised Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan* (NOP) dated February 21, 2014. Thank you for the opportunity to comment on the proposed project's potential environmental impacts.

As you know, the District provides fire protection and emergency medical services (EMS), water, sewer collection, and garbage collection services for the community in Olympic Valley and along the Truckee River corridor. We also perform snow removal on public bike trails in the valley. We have been requested by the project applicant to provide services to their proposed project.

It's our understanding the County will perform analyses of environmental impacts of the proposed project including those to the District's ability to maintain its current levels of service, the improvements required to mitigate them, and the effects of increased demands on our facilities and systems.

Improvements to the District's existing systems as well as new infrastructure necessary to provide additional capacity are expected to be delivered prior to construction of the project phase necessitating them. This approach is in lieu of constructing improvements after the demand of a specific phase triggers the improvements 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 Squaw Valley Real Estate (SVRE) and the

District will help define the scope and schedule 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 consistent with the Fire Department's *Capital Facilities Plan*, including construction of a **resident fire station**, procurement of **apparatus** and development of **ambulance** transport capability.

A **new resident fire station** including living quarters and a training facility as well as an **air-ambulance landing zone** should be included in the scope of the project with consideration given to land acquisition, permitting, and zoning necessary to construct it.

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

As you know, the District is currently preparing the **Water Supply Assessment** (WSA) required by the project. The WSA will assess whether there is adequate water supply to meet the water demands prescribed in Senate Bill (SB) 610 during normal, single dry, and multiple dry years. Although the District is preparing the WSA, Placer County, in its role as Lead Agency, is required to approve the WSA pursuant to California Water Code §10912.

As an alternative, SVRE proposes to form a **new Mutual Water Company** to provide water for domestic consumption, fire protection, irrigation and recreational purposes. The District understands that if a new Mutual Water Company is formed, the District will not be requested to provide water service to the project and a new WSA would be prepared. There are multiple entities which draw water from the aquifer and the effects of pumping by the developer will affect the correlative rights of all pumpers, which should be addressed in the Draft EIR. If a new

Mutual Water Company is formed, the County should adopt enforceable mitigation measures requiring reduction of pumping and consumptive uses in the event of depletion of the water supply or lack of sufficiently available sources of supply.

This alternative proposal for water supply to the Project underlines the need for evaluation of a redundant and supplemental supply of water to enable the District to meet future demand as projected by the District, as well as contemplated by the Squaw Valley General Plan; to replace existing supply and projected sources of supply in the event of groundwater depletion (overdraft or drought) or contamination.

The proposed locations of existing and future wells to serve the existing, project, and anticipated future demand, should be analyzed to prove they are compliant with safe drinking water standards. New wells and existing wells will require replacement in the future as they age and deteriorate. The proposed project should consider reserving and maintaining additional space for well replacements.

The **location of the project** 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 and the Squaw Valley Mutual Water Company's entire service areas are provided 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.

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 (drilling islands) to allow for replacement and rehabilitation of wells, along with areas dedicated to access the aquifer to develop future water supplies.

The District is concerned that the proposed water supply source 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 (e.g., overdraft, drought, contamination). 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*, the *2009 Alternative / Supplemental Water Supply and Enhanced Utilities Feasibility Study*, or the *2014 Redundant Water Supply – Preferred Alternative Evaluation*. **Alternative water supply solutions** will likely require further environmental analyses.

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optic and bike trail access. Placer County and the District have initiated work on this project and Placer County should consider an expansion of scope to include the utility corridor, bike trail, and an EVA. This project also achieves the goals of many long-term regional transportation plans.

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 with financial support from the project applicant, SVRE, recently completed Phase II of the Creek Aquifer Interaction Study, which analyzed 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 now better understood and it appears its demand and supply may influence the water budget being considered for potable supply in the valley, including the proposed project. Existing snowmaking demands are being evaluated in the current scope of the WSA. Future supply and demand for snowmaking operations should be evaluated to determine its impacts on the District's ability to ensure long term water supply solutions.

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plans to include applicable analyses in the Draft EIR.

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The impacts of the project's wastewater generation flows on the District's collection system are being evaluated through hydraulic modeling. 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** may require 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 local affordable housing, 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 provides snow removal services and wintertime maintenance of bike trails 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** may be required to support the District's seasonal program.

Conditions of Service

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

PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

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

March 24, 2014

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

RE: Village at Squaw Valley Specific Plan Project / *Revised* NOP of a Draft EIR

Maywan:

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

The proposed Village at Squaw Valley Specific Plan Project has 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

[illegible]

SQUAWVALLEYMUTUAL 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

March 10, 2014

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). Specifically this would apply to SVMWC's well's # 1 & 2 including the combined pumping facility for both wells located within the proposed area of development. This includes the replacement of any facility displaced by the project ;

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Olympic Valley, CA 96146
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- 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.
- 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-a-vis any new users. The EIR must, therefore, examine how the project proponent will ensure respect for existing users' water rights, including the rights

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of SVMWC, in times of water shortage as demonstrated by the current three consecutive year drought. 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 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 substantial 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,

John Johnson
President, SVMWC

SQUAW VALLEY
PUBLIC SERVICE DISTRICT

March 24, 2014

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: Comments on the Revised NOP of a Draft EIR for the Proposed Village at Squaw Valley Specific Plan

Dear Alex,

The District reviewed the *Revised Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan* (NOP) dated February 21, 2014. Thank you for the opportunity to comment on the proposed project's potential environmental impacts.

As you know, the District provides fire protection and emergency medical services (EMS), water, sewer collection, and garbage collection services for the community in Olympic Valley and along the Truckee River corridor. We also perform snow removal on public bike trails in the valley. We have been requested by the project applicant to provide services to their proposed project.

It's our understanding the County will perform analyses of environmental impacts of the proposed project including those to the District's ability to maintain its current levels of service, the improvements required to mitigate them, and the effects of increased demands on our facilities and systems.

Improvements to the District's existing systems as well as new infrastructure necessary to provide additional capacity are expected to be delivered prior to construction of the project phase necessitating them. This approach is in lieu of constructing improvements after the demand of a specific phase triggers the improvements 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 Squaw Valley Real Estate (SVRE) and the

District will help define the scope and schedule 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 consistent with the Fire Department's *Capital Facilities Plan*, including construction of a **resident fire station**, procurement of **apparatus** and development of **ambulance** transport capability.

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Conditions of Service

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

Town Council

Patrick Flora, Mayor

Alicia Barr, Vice Mayor

Dr. Mark Brown D.C., Council Member
Joan deRyk Jones, Council Member
Carolyn Wallace Dee, Council Member

Department Heads

Tony Lashbrook, Town Manager
Andy Morris, 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

March 12, 2014

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

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

Dear Ms. Krach:

Thank you for continuing to include the Town of Truckee in your circulation of the revised Notice of Preparation for the Environmental Impact Report for the Village at Squaw Valley Specific Plan and project.

Even with the significant downward revision of total housing and lodging units, the project is still substantial with regional construction, traffic and housing impacts that will affect the Town of Truckee. As such, the Town would like to reiterate the comments in the previous letter from Tony Lashbrook, Town Manager, dated November 9, 2012 (find attached).

The Town appreciates that "Additional information has also become available regarding several project components, including plans for employee housing." Moreover, the Town continues to stress the importance of explicitly detailing workforce housing needs within the project as well as analyzing the housing impacts stemming from the project on adjacent communities.

The Town of Truckee appreciates the opportunity to comment on this project and is committed to working with the County to clearly communicate and address our concerns.

Please contact me with any questions or concerns at (530) 582-2927 or csvensk@townoftruckee.com.

Sincerely,

Christian Svensk
Senior Planner

Tahoe/Truckee
All-America City
2012

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Animal Services/Vehicle Abatement: 530-582-7830 / Fax: 530-582-7889 / *email: animalservices@townoftruckee.com*
Police Department: 530-550-2328 / Fax: 530-550-2326 / *email: policedepartment@townoftruckee.com*
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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
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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

Friends of Squaw Valley
PO Box 2823
Olympic Valley, CA 96146
www.friendsofsv.org

March 24, 2014

Placer County, Planning Services Division
Attn: Maywan Krach, CD Technician
3091 County Center Drive #190
Auburn, CA 95603
Via email: cdraecs@placer.ca.gov

Re: Notice of Preparation (NOP), Village at Squaw Valley Specific Plan Environmental Impact Report (EIR)

To Whom It May Concern:

Thank you for the opportunity to comment on the NOP for the Village at Squaw Valley Specific Plan EIR.

Friends of Squaw Valley is a group of Squaw Valley residents, skiers, snow boarders, and business persons who are concerned about the future of Squaw Valley. We were formed in response to the proposed project. Our mission is to advocate for environmental sustainability, economic viability, and development that is aesthetically compatible with our community's character.

Our comments on the NOP follow and we also incorporate by reference the Sierra Watch NOP comments.

Project Description

The NOP Project Description does not detail many of the components of the project, making it difficult for the public to be aware of its full scope to comment on. For nout, what uses will actually be included in the Mountain Adventure Camp (MAC), how many stories will be permitted in individual buildings and what will be the height of each story? Other Project Description inadequacies are described in detail in the Sierra Watch NOP.

The Specific Plan itself is vague on some aspects of the project, making it impossible to include them in the NOP or EIR Project Descriptions. As a result, we wonder if the impact analysis in the EIR will be able explore impacts adequately

For example: The Public Facilities and Utilities chapter of the Specific Plan notes that water sources outside the Valley floor may or may not be used (SP page 6-5, para 4)

and a new water company may or may not be formed (SP page 6-3, para 5). A new 0.7 million gallon water tank is proposed in the Specific Plan (SP Figure 6-1), but the NOP notes that a 1.5 million gallon tank may be needed (NOP page 9). Off-site parking areas may or may not be provided (SP page 5-9, para 3). A transit center is planned, but not described. An emergency vehicle access connecting to the Resort at Squaw Creek may or may not be constructed (NOP, page 8). The Concept Plan is included as an illustration of one potential outcome, yet it is inconsistent with the Specific Plan text in some areas (width of Squaw Valley Creek open space, no parking structures shown).

The EIR Project Description and individual sections of the EIR must ferret out the actual project description in these and all project proposals and discuss the relevant impacts. Where the Specific Plan is vague as to the project description, the EIR must assume significant and unavoidable impacts will occur in relevant impact areas since it will be unclear how the proposal addresses the potential impacts.

Finally, the NOP continually compares the current Specific Plan to the previous submittal. The EIR should not include this comparison in the project description nor in the impact analysis. This is confusing to the public as there is only one project on the table, the current submittal.

POTENTIAL ENVIRONMENTAL IMPACTS

It is unclear whether or not the EIR will be considered a Program EIR or a project specific EIR. Regardless of the term used, it is important to our members and the public to be able to fully understand the impacts of the project at build out. This requires a level of specificity in every section of the EIR that assumes a built out project, not just the adoption of a Specific Plan document.

Land Use

The proposed Specific Plan requires amendments to the Placer County General Plan and the Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) and, as a result, is inconsistent with these plans. We believe it is also inconsistent with the Squaw Valley Design Guidelines as they will also be revised if the project is approved. These documents have provided guidance to development in the Valley for up to 30 years. The project inconsistencies with these adopted plans should be described in detail, policy by policy, guideline by guideline, so that we can understand the degree of divergence from them that will result. Most of the policies and guidelines were adopted to avoid environmental impacts and, as a result, project inconsistencies with them would constitute land use impacts.

A comparison of existing and proposed zoning by type and location is needed. Impacts related to zoning which will be increased in intensity should be discussed. For instance, existing Forest Recreation zones have been increased in density in some areas including adjacent to the Shirley Canyon Trailhead where Heavy Commercial zoning is proposed for the maintenance area.

Population, Housing, and Employment

The EIR should identify a "worst case" residential population and mountain use at build out of the project. This will entail determining the following:

- Existing population and mountain use and other visitation by season (including employees)
- Projections of additional growth in these same categories that will occur at project build out and incrementally by phase.
- Peak use days which could result based on the project proposals should also be estimated.

The EIR should then determine if the adopted residential and mountain holding capacity in the Squaw Valley General Plan has already been exceeded or will be exceeded combined with project build out.

In addition, we are concerned that a project of this size (a new city) may have substantial growth inducing impacts in neighboring areas such as Truckee and the Tahoe Basin, altering our region's quality of life. This possibility needs to be explored in detail in the EIR including what direct and indirect impacts might result from any induced growth including air quality, water quantity and quality, traffic, and greenhouse gas emission impacts as well as increased demand for housing and other land uses. This is a critical potential impact and we request that the analysis be meaningful and in depth, quantified wherever possible.

Economic Impacts

Related to project growth are the potential economic impacts of the proposed project which could result in physical impacts in other communities in the region. For instance, will the project monopolize so much of the market potential for visitor housing or other market sectors (such as retail businesses, commercial recreation, etc.) that these sectors in Truckee or the Tahoe Basin will be negatively impacted, resulting in physical impacts due to vacancies, etc. Alternately, will initial phases involve only real estate sales and how will the success/lack of success of these sales affect the financial ability to support the ski resort? Is there a market for the amount of and type of residential/hotel uses proposed or is there the potential for a "ghost town" effect? Will the commercial and recreational aspects of the proposal be supportable by the ultimate proposed residential mix? At what phase of build out will they be supportable? What governmental fiscal impacts will result if a full mix of uses proposed does not come to fruition? What mix of land uses should be required by phase to ensure a healthy land use as well as economic mix?

The economic impacts of the project should be analyzed in depth in the EIR, prepared by consultants with expertise in this field.

Visual Resources

The expected aesthetic and visual resource impacts of the project are of great concern to Friends of Squaw Valley. The Specific Plan text and its Appendix B could result in a project of a design and scale not in keeping with the existing village, blocking or substantially altering the spectacular and iconic views to the mountain and slopes, with bulky buildings and shaded public gathering areas and walkways. These features are not consistent with the Squaw Valley General Plan and Land Use Ordinance or the Squaw Valley Design Guidelines which were adopted in part to avoid negative aesthetic impacts. As a result, these documents should be used to evaluate visual impacts. We have attached some of their requirements which relate to these issues (Attachment A).

The following questions should be answered in the EIR:

- Will the project have a substantial adverse effect on a scenic vista?
- Will the project substantially degrade the visual character of the site and its surroundings?
- Will substantial new light or glare be created?

More specifically, to assist in answering the questions above:

- Will important views be blocked from Squaw Valley Road, from neighboring residences within and outside the village, and from within the existing and future village open areas?
- Are open spaces and walkways within the Village Core wide enough to keep important views open?
- Will the build out of the project at maximum heights alter views to the mountain and slopes from important viewing points including Squaw Valley Road, Village open spaces, existing homes and businesses, and future viewing points within the expanded village and Village Commercial-Residential area?
- Will the potential bulk and height of proposed buildings in the Village Commercial area overwhelm and impact the visual value of the existing village?
- Are policies and guidelines within the SVGPLUO and Squaw Valley Design Guidelines which are intended to avoid visual impacts and view disruption inconsistent with project proposals?

In order to answer these questions, the following analyses will be needed:

- Numerous cross sections through various project points and the surrounding vista and viewing points at build out.
- Photo visual simulations of the project at maximum height and width at build out from and to the same vista and viewing points.
- Story poles on site to demonstrate building heights.
- Cross sections and visual simulations should include the MAC.

The following mitigation measures should be evaluated to reduce impacts to surrounding views to and from the project area and to comply with the SVGPLUO and Design Guidelines:

- Methods to open views and eliminate shading during most of the day (10 am to 4 pm), such as stair stepping of buildings and lowering maximum heights.
- Methods to reduce shadowing of open areas and adjacent buildings such as orientation of buildings, limits on height, distance between buildings, and stepping of building facades.

  We recommend lowering the maximum building heights to a consistency with the SVGPLUO and SV Design Guidelines, the creation of wider plazas and walkways, architecture that is human in scale – stepping up in height from the public areas, north south orientation of buildings for maximum sun exposure, and specific sun exposure criteria. Without specific design criteria in these areas within the Specific Plan or mitigation plan, it cannot be assured that mitigation of related impacts will result.

Public Facilities and Utilities/ Water Supply

As discussed previously, unless the details of proposed public facilities and their financing are made more specific in the Plan, it is unclear what the proposals are and impacts including ability to serve cannot be accurately evaluated.

For example:

- The extent and locations of the proposed well system proposed are not specifically set forth. How will any new wells impact existing wells? How can future unforeseen impacts be mitigated after project approval? Should bonding be required to mitigate potential impacts to existing users?
- The amount of water demand to be generated by the project has not been included in the Specific Plan. What high generation water uses are proposed (such as the water park) and what impact will they have on water supply and storage needs?
- The water supplier has not been determined (SP page 6-3, para 5). If a second water company is created, will this have negative impacts to the management of the alley aquifer?
- A new 0.7 million gallon water tank is proposed in the Specific Plan (SP Figure 6-1), but the NOP notes that a 1.5 million gallon tank may be needed (NOP page 9).
- Off-site parking areas may or may not be provided (SP page 5-9, para 3).
- A transit center is planned, but not described.
- An emergency vehicle access connecting to the Resort at Squaw Creek may or may not be constructed (NOP, page 8).
- The details of the proposed sewer line system must be determined and potential impacts to the creek in the event of breakages and during construction must be analyzed. The adequacy of the sewer main to the TTSA to handle project and cumulative impacts must be evaluated.
- Drainage plans must be presented in greater detail to understand potential impacts and not passed on to future study.
- Propane. The EIR must quantify the expected propane need at full build out. The size and location of storage tanks, and expected delivery truck traffic. Impacts to be addressed should include explosion and leakage risks and methods to avoid this risk.
- Fire. Increased demand for fire protection facilities and staffing must be determined at build out and by phase and particular to each type of land use proposed and facility/ staffing costs identified.
- Parks. The NOP notes that a previously proposed park is no longer part of the project proposal. While a linear park along the creek may meet some of the parks and recreation obligation of the project, the entire requirement needs to be defined including the need generated by category of residence: private residences, condo-hotels, hotels, etc.

The Specific Plan Financing Strategy (Specific Plan page 8-17) is vague as to how these public facilities and utilities will actually be paid for…*"Some regionally serving public facilities may be funded by a larger fee program that includes areas both within and outside the Plan Area."* (Policy IM-6-1)*…"The costs for public facilities will be allocated as much as possible based on a project's fair share of required improvements."* (IM-6-2)*…"A community facilities district may be established to help fund the construction and/or acquisition of backbone infrastructures and facilities…"* (IM8-6-6 para 4) (Emphases added.) This vagueness on the actual public facilities proposed, their cost, and the plan for funding them makes it impossible to tie down the project description related to public facilities and therefore it is impossible to discuss potential impacts.

The details of the proposed public facilities and financing must be ferretted out or impacts must be determined to be significant and unavoidable. Deferring these impact discussions to further study or relying on future financing plans or decisions on the components of major public utilities to be developed would be inappropriate. This would leave us without an understanding of whether or not the project can be adequately served by facilities as basic as water and what impacts might result.

Additionally, the following questions should be answered in the EIR:

- Will growth inducing impacts result from construction of new public facilities and utilities?
- Will direct and indirect impacts result from the physical construction of each of the proposed facilities and where they will be located in relation to other land uses?
- There is discussion of the potential for an offsite water line to be extended from the Martis Valley to serve the project. If such a proposal is expected its impacts must be fully analyzed in depth.

- There has been discussion of a natural gas line to be extended to the project also, is this part of the project description and what impacts will result?

Noise

The noise impacts of both substantial additional visitor and residential traffic as well as construction traffic which will continue for perhaps 25 years are also concerns of our membership.

Placer County Ncise Ordinance standards are currently being exceeded at residences along Squaw Valley Road. As a result, any increase in traffic will result in a significant project and/or cumulative impact. Measures to avoid this impact which do not cause further indirect impacts must be identified or the scale of the project must be reduced.

A full noise analysis is needed evaluating project and cumulative traffic and construction noise impacts at various points in the project build out period as well as those of each of the project alternatives.

Transportation and Circulation

A full project and cumulative traffic and parking impact analysis is needed. Because existing target traffic levels of service may have already been exceeded, it is likely that traffic impacts may not be mitigated to below the significant level. Regardless, all available mitigation measures must be explored and the project impacts must be mitigated to the maximum degree possible.

Hydrology and Water Quality

Squaw Creek water quality is already impaired (excessive sediment) and quantity (deficient in stream flow). Further water extraction and increased development will clearly decrease flows and water quality. Water quality and quantity impacts need to be fully analyzed including a full TMDL assessment. The BMP program listed in the Specific Plan's Drainage Plan is generic; it cannot be assured that these generic measures will mitigate potential water quality impacts. Quality of snow melt form snow removal melt areas is also a concern and should be analyzed. A long term monitoring program should be part of the mitigation plan to ensure that performance criteria are met over time.

A more ambitious restoration of Squaw Creek should be analyzed as a mitigation or design alternative as this will likely be needed to address project and cumulative impacts to the creek. (See NOP letter from David Stepner, page 5.) As the creek is currently impacted, any increase in impacts must be considered significant.

A full wetland delineation and impact analysis is needed in the EIR.

Biological Resources

The US Fish and Wildlife Service recently addressed critical habitat for the endangered yellow-legged frog. The EIR must fully address this concern especially since Shirley Canyon encroachments are proposed. Sitings of the yellow-leggedfrog in Shirley Canyon have recently occurred.

Special attention should be given to the impacts which will result in the wooded proposed Village Neighborhood area.

Cultural Resources

As the NOP described, the project area is considered archaeologically sensitive (NOP page 11). As a result, a full cultural resources assessment of the project area is required. It is likely that prehistoric sites are present under existing paving. As a result, a mitigation plan should be identified to ensure that these types of resources are not destroyed as construction proceeds and the possibility that construction areas will need to be altered should be anticipated.

In addition, two of the three Olympic Games buildings are proposed for demolition. The EIR consultants should be sensitive to the fact that local criteria are permitted to be used in determining whether or not buildings are historically significant. The community clearly feels that these buildings are historically significant and that their loss would result in a significant impact. (Squaw Valley General Plan: *"It is the intention of these regulations to preserve existing attractions in this district…"* (page 85, para 2).

Geology, Soils, and Seismicity

A full geotechnical impact and mitigation analysis is needed, particularly due to the seismicity in the area.

Wildland Fire, Emergency Response, and Evacuation

The valley has only one emergency egress (Squaw Valley Rd. to Highway 89). Both emergency vehicle access to the valley and evacuation out of the valley may be impossible during an emergency event. A full emergency response, evacuation analysis, and safety mitigation plan is needed in the EIR. It will be important to determine if adequate fire, police, emergency service, and road infrastructure will be available to serve the project via its public facility/service and financing proposals at each phase of build out.

Wildfire in valley and in the Tahoe Basin is always imminent during dry summers. We refer you to the Sierra Nevada Publication: Dangerous Develcpment, Wildfire and Rural Sprawl in the Sierra Nevada as a resource on this important issue.

Air Quality

We refer you to the Sierra Watch comments on this subject.

Greenhouse Gases and Climate Change

We refer you to the Sierra Watch comments on this subject.

Mitigation Measures/ All Available Mitigation

We are particularly concerned that all available mitigation be explored and that all impacts be mitigated to the maximum degree possible. In subject areas where we expect that impacts may be unavoidable (such as traffic, noise, air quality, greenhouse gas emissions, water quality) a special effort will be needed to identify mitigation measures or reduced scale alternatives/

CEQA requires that all feasible available mitigation be identified. In fact, an EIR must explore all available mitigation measures even if some are not selected (CEQA Guidelines Section 15126.4 (a) (1) (B)). Thus, the EIR may not "drop the ball" and conclude that an impact is unavoidable when, in fact, mitigation measures may be available. It is the responsibility of the County to mitigate these impacts to the maximum degree possible even if they cannot be mitigated fully, rather than just stating: "no measures are available". And, it may be necessary to create a project alternative (such as reduced scale) to address impacts which cannot otherwise be mitigated.

We recommend that budget be retained to address the effectiveness of additional measures or project alternatives which may be recommended by the public in key impact areas after the DEIR has been released. This will ensure more than just a cursory attention be given to creative ideas which may come up after review of the detailed reports by the public.

Cumulative Impacts

The project combined with other similar projects in the region plus background planned additional growth in the Valley will result in cumulative impacts in any number of the impact areas covered by the EIR, particularly since the project will likely build out over a long period of time. This is the largest project proposed in the Tahoe regions for decades. As a result, each impact area discussion should include a detailed cumulative impact analysis, not the cursory review often found in EIRs. Cumulative impacts to water supply, traffic, noise, wastewater treatment, air quality, and greenhouse gases are of particular concern.

Please note that the Resort at Squaw Creek is approved for a phase 2 development, PlumpJack has submitted an expansion plan, and the 29 acre Poulsen family property is for sale. Background growth already planned in the Valley and the region must also be included in the analysis.

Cumulative mitigation measures should be recommended including phasing of development approvals based on the ability for the project and regional governments to meet performance standards or provide mitigation at various check points in time.

Alternatives

One of our key interests is the creation of the environmentally superior alternative. A project of this scale is expected to have numerous significant and unavoidable impacts. As a result, the alternatives to be discussed in the EIR will be of critical importance to our organization, the public, and the decision makers. We hope that the EIR will be able to identify alternatives that mitigate or substantially lessen otherwise unavoidable impacts, lessen other impacts, and foster informed decision making. In order to ensure this outcome, the Alternatives section should include a full range of alternatives in both design and scale. In addition, each alternative should be discussed and compared in detail and impacts quantified where possible, not in the cursory form often seen in EIRs, in order to be useful to the decision makers and the public. Where specific subconsultant reports are contracted (such as noise, traffic, economic, visual) they should include detailed analysis of the project alternatives.

CEQA requires that the alternatives in an EIR must feasibly attain most of the basic project objectives while avoiding or substantially lessening the project's environmental impacts. It is unclear what will be used in the EIR as the project sponsor's objectives. It appears that they are those listed on page 1-1 of the Specific Plan (para 2) which include implementation of the Squaw Valley General Plan and Land Use Ordinance and ensuring that the area has *"the capacity to serve and house the optimum number of tourists, visitors, and residents…without adversely impacting the unique aesthetic and environmental assets of Squaw Valley (SVGPLUO, page 4)"*. If this is the primary sponsor objective, a very wide range of reduced scale and design alternatives would be justified in order to avoid adversely impacting these "unique aesthetic and environmental assets". In addition, we request that alternatives be included which explore a wide range of planning options, rather than just project proponent oriented alternatives. This is important because the project is first and foremost, as proposed, major revision to the Squaw Valley General Plan Land Use Ordinance and Design Guidelines which are long range community planning tools that should represent the community's goals and vision for its future.

Thank you for the opportunity to comment. Please continue to keep us on the contact list for all events or notices relating to the project or its environmental review.

Sincerely,
Laurie Oberholtzer
Consulting City and Environmental Planner
for
Friends of Squaw Valley

Attachment A
Squaw Valley General Plan, Land Use Ordinance and Design Guidelines

Policies and Guidelines
Relevant to Critical Village Planning Design Issues

Friends of Squaw Valley has reviewed the Squaw Valley General Plan, Land Use Ordinance, and Design Guidelines as they relate to the proposed KSL project. It is a lengthy body of regulations. Because the project is so large, we have found that it is most useful to look at the "big picture" design policies and guidelines.... those addressing town planning level design issues such as the mass, height, scale and feeling and form of the community we envision. We have listed what we view as the critical "big picture" design guidelines and policies below and provided a brief analysis of the Specific Plan's inconsistency with them where appropriate.

Height, mass, scale of buildings/ Views/ Sun Access

1. Section 220.16 of the Placer County Code (page 87 of the SVGPLUO) dictates height limitations in the Village Commercial District which is what much of the plan area is currently zoned. It states that ***"height limits shall be set for particular developments through the design review process where other developed or developable parcels are affected by a proposed building."***

Further direction is then given in the SV Design Guidelines:

2. SV Design Guidelines, Building Design Guideline 1, page 21: ***"Building design should compliment and harmonize with neighboring buildings."*** Height and scale are listed as 2 ways to achieve compatibility.

3. SV Design Guidelines, Building Design Guideline 3, page 21 (in part): ***"A building or project should be in scale with its immediate surroundings and with the area."***

4. SV Design Guidelines, Site Plan Design Guideline 4, page 11: ***"Buildings should be sited with consideration given to sun and shade..."***

5. PUD projects: ***"In most cases, the 35 foot height limit shall prevail, however, where the applicant can demonstrate: 1. That the establishment of a greater height limit will result in a reduction in land area disturbed by such developments; 2. That the project, as proposed, will reduce the visual impact of a similarly sized project which would meet the normally required 35 foot limit; 3. That the additional height requested will not create additional adverse impacts on public services nor on the environment; 4. That the buildings proposed will not adversely affect the view from adjoining development, nor adjoining developable land; and 5. That the buildings proposed will not interrupt adjoining properties potential for solar access."*** (Land Use Standards 137.13, page 81, SVGP)

6. Heights in other zones such as High Density Residential and Heavy Commercial are specifically limited to 30 to 35 ft. (Land Use Standards 137.12, page 81, SVGP

7. The Village Commercial district text in the Squaw Valley General Plan on page 85, para 4, states that high density development may be justified but that: ***"At the same time, the maintenance of the principal views of the mountain peaks and hillsides must be retained to the maximum degree possible. It is therefore intended that these regulations establish pedestrian open space requirements, floor area ratios, and open space ratios which provide the framework for a pedestrian and view oriented urban design."***

8. SV Design Guidelines, Site Design Guideline 2, page 10: ***"Buildings should be sited so that they do not interrupt the flow of the skyline as viewed from common vantage points."***

9. SV Design Guidelines, page 10, Site Plan Guideline 1: ***"The existing natural features of a site should be retained and used to advantage. The incorporation of features such as creeks, trees, natural slope, rocks and views often leads to a more interesting and unusual design."***

The Squaw Valley General Plan and Land Use Ordinance and Design Guidelines clearly envision a village that harmonizes with surrouncing development and which has a focus on view oriented urban design and that does not interrupt views and access to sunlight. The Specific Plan is not consistent with the height, mass, scale, view, and sunlight protection guidelines in the SVGPLUO and Design Guidelines including those listed above. The Specific Plan should be evaluated against these and other related aesthetic land use standards in the SVGPLUO and Design Guidelines for consistency and recommend appropriate mitigation measures. This determination should not be left to the discretion of decision makers; rather a recommendation should be offered by the EIR consultarts similar to those in other EIR sections.

Parking

The Squaw Valley General Plan parking discussion begins on page 45 and calls for: Retention or re-creation of 3000 day skier parking spots (SVGP page 47 paras 2,3). Replaced day skier parking specifically cannot be provided in a parking structure at the entry to the Valley (SVGP page 48, para 3).

The Squaw Valley Design Guidelines state that ***"All off street parking shall be located on the same property as the major land use it is intended to serve, unless located within a parking structure..."*** (Page 14, Guideline 3)

Placer County Land Use Ordinance parking standards:
1 space per bedroom for hotels
.75 spaces per bedroom per residential unit
1 space per 300 sq ft per gross square foot of commercial space.
These ratios can be altered by the DRC and the Planning Commission if part of a PD project.

The parking proposals in the Specific Plan must be analyzed for consistency with each of the parking standards in the SVGPLUO and Design Guidelines.

History

The Squaw Valley General Plan states: ***"It is the intention of these regulations to preserve existing attractions in this district…"*** (Page 85, para 2)

Two Olympic era buildings are proposed to be demolished.

Pedestrian Circulation

The Squaw Valley General Plan calls for a pedestrian orientation in the Village Commercial District (page 84, para 5): ***"The intent of creating a "Village Commercial" land use district is to allow for and guide the development of an environment that will be interesting to people on foot, that would remove or reduce pedestrian competition with the automobile…. attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area."***
Squaw Valley Design Guidelines: ***"In the Village Commercial District special emphasis will be placed on the provision for pedestrian open space."*** (Guideline 9, page 11)

The pedestrian walkways planned to be as narrow as 15 feet and the main plaza shown on the Concept Plan are not expansive enough to meet these goals.

Zoning/Land Use Mix Issues

Density and Intensity:
The Village area is currently zoned largely Village Commercial with additional areas of Low Density Residential, High Density Residential, Heavy Commercial, Forest Recreation, and Conservation Preserve. The KSL proposal replaces this zoning with new zoning districts. It is difficult to compare the two, though in some areas increases in density are proposed.

Land use and zoning densities are typically expressed as a maximum number of units or square footage of buildings, and this is the case in the Squaw Valley General Plan and Land Use Ordinance. The final units/square footage permitted when a specific project is proposed is normally based on the ability of a proposed development to meet all of the General Plan policies and adopted standards and guidelines while not exceeding environmental and public facility constraints. Thus, whether or not the KSL project is consistent with current land use and zoning densities must be determined in concert with other policies and environmental review.

Mixed Uses and Cohesiveness with the Existing Village:
Much of the plan area is currently designated Village Commercial in the General Plan where a mix of land uses is permitted and encouraged ***"to allow for and guide the development of an environment that will be interesting to people on foot, that would remove or reduce pedestrian competition with the automobile…. attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area. As the focal point of a destination ski resort, development occurring within this district must be equally oriented to the ski hill and the major pedestrian and vehicular access points. Commercial and tourist residential uses are encouraged to be provided within the same structure. The area so designated in the Squaw Valley General Plan has strong potential for complementary development, attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area."*** (SVGP Pages 84, para 5)

We do not believe that the Mountain Adventure Camp structure at 90,000 plus square feet, in a separate single purpose type structure, with a mixture of retail and recreational type uses is consistent with this goal of a mix of land uses within the village core.

Balancing Land Use Types:
The Squaw Valley General Plan recognizes that a vibrant Village will require additional visitors lured by new accommodations and summer recreation activities. Yet, it notes that ***"At the same time, the quality of the permanent residential community must not be adversely affected by the detrimental effects of short term, high intensity use by a transient, seasonal population."*** (SVGP Page 5, para 3) and that: ***"…it is apparent that rational limits must be placed on the development of Squaw Valley. 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. A potential conflict exists between permanent residents, enjoying their community, and land owners profiting from a greater amount of tourist dollars flowing into the area. The construction of additional tourist related recreational development, though it may bring economic gains to many, can result in a diminished ability for the local residents and visitors to enjoy the area."*** (SVGP Page 7, paras 1 and 2)

These goals make it clear that the analysis in the EIR of project created growth of the scale proposed and its direct and indirect impacts will be critical to understanding whether or not the proposal is larger than the holding capacity of the valley, environmentally and socially.

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

March 24, 2014

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

Dear Ms. Krach:

Please accept the attached comment letter on the Village at Squaw Valley Specific Plan Project Revised Notice of Preparation (NOP).

The project proposal represents one of the biggest development decisions Squaw Valley – the entire Tahoe Region – has ever faced. So it's critically important that each step of the CEQA process provides ample opportunity for meaningful public involvement.

But, as made clear in the attached comment letter, the NOP fails to provide the basic information necessary for the public to gain an adequate understanding of what development of this size, scope, and scale could mean.

For example:

1. The NOP misleads the public by consistently comparing the current project to KSL's previous proposal, giving the false impression that the current project is somehow environmentally beneficial. But the failed 2012 proposal is irrelevant; the County must assess the new proposed Project on its own merits.

2. The NOP downplays the size of the entire project, claiming in a summary "total maximum bedrooms" of 1,493. But, elsewhere in the document, the NOP reveals a total of 1,757 bedrooms.

3. The NOP provides no meaningful details about the proposed land use plan, including only one graphic that illustrates "one scenario of how the Specific Plan could be implemented."

4. The NOP lacks-basic information to, as CEQA requires, give the public a chance to understand the potential environmental impacts of the project.

5. The NOP fails to identify feasible alternatives to minimize or eliminate altogether a project's significant environmental impacts, as mandated by CEQA. Incredibly, the NOP fails to identify any project alternatives.

Given the NOP's focus on a previous proposal, its misleading numbers about the current project, and its utter lack of specifics or alternatives, the logical response is: *what project?*

It looks as if the County has been put in the untenable position of producing an NOP for a proposal about which the applicant has not provided sufficient information. The best course of action would be an entirely new project application and, subsequently, a new NOP that gives the public some sense of what's really at stake.

Sincerely,

Tom

Tom Mooers
Executive Director

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March 21, 2014

Via Email and U.S. Mail

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 Revised Notice of Preparation

Dear Ms. Krach:

On behalf of Sierra Watch, we thank you for the opportunity to provide comments on the revised Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Village at Squaw Valley Specific Plan ("Project").

I. Introduction

Our letter on the initial NOP identified numerous deficiencies in the NOP and Initial Study (collectively referred to as "NOP") and requested that the County revise and recirculate its NOP. *See* letter from Shute, Mihaly & Weinberger LLP, November 9, 2012, hereby incorporated by reference into this letter. We explained that, in numerous instances, the NOP lacked adequate and reliable information regarding the nature of the Project and its probable environmental impacts making it almost impossible to solicit guidance from members of the public as to the scope and content of the information to be included in the EIR.

We anticipated that the revised NOP, in addition to identifying changes to the Project, would have incorporated the public's comments on the initial NOP. The revised NOP does not, however, provide much, if any, of the information or analysis we

requested. Each of the comments that we raised previously are legitimate issues pertaining to the environmental review process. The County's failure to address these issues is concerning, as the California Environmental Quality Act ("CEQA") requires a good faith, reasoned analysis in response to comments. CEQA Guidelines § 15088 (c).[1] We hope that the County will give serious consideration to these and other public comments as the administrative process for the Project review continues.

In addition, the revised NOP consistently compares the current Project with KSL's prior proposal. While such comparative information might be interesting to certain members of the public, the NOP must assess the environmental impacts of the proposed Project alone. The applicant published a summary of changes, comparing the major revisions and adjustments from the prior proposal to the current proposal. *See The Village at Squaw Valley January 2014 Specific Plan Summary of Changes*. We can find no logical explanation for the NOP's continued comparison of the current and prior project. The prior proposal is "off-the- table." By comparing the new proposal to the prior proposal, the public is given the misleading impression that the current project is somehow environmentally beneficial. This is not the case. It is to avoid such confusion that CEQA prohibits comparing environmental impacts to a plan rather than to existing conditions. *Woodward Park Homeowners Ass'n v. City of Fresno*, 150 Cal App 4th 683, 707 (2007) (EIR must "compare what will happen if the project is built with what will happen if the site is left alone."). The fact that a prior proposal may have been more impactful is irrelevant to the analysis of whether the current project would have significant or cumulatively significant environmental impacts. The County must evaluate the proposed Project on its merits, not in comparison to an irrelevant prior proposal.

II. 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." CEQA Guidelines § 15375; *see also* CEQA Guidelines § 15082. In order to effectively solicit such guidance, the NOP must provide adequate and reliable

[1] Although this CEQA Guideline pertains to a lead agency's response to comments on a draft environmental impact report ("EIR"), the County should make a good faith effort to address all environmental issues raised by the public.

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. We respectfully request that the County again revise and recirculate its NOP in order to remedy this serious problem.

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 prepare a meaningful response to the NOP. CEQA Guidelines § 15082(a)(1)(A)&(B). Unfortunately, the County's NOP fails to meet this basic standard. Critical details about the Project remain undefined. Those aspects of the Project that the NOP attempts to describe are depicted with so little detail that a reader is left with virtually no idea of what the Project would look like at build-out or how or whether its components will function at maximum capacity. A few of the most egregious deficiencies in the Project Description are set forth below.

- *Proposed Land Use Development and Design.* The NOP provides no detail about the proposed land use plan other than simply identifying the number of bedrooms and units and the maximum height of buildings. It provides only one graphic (Exhibit 4) and explains that this graphic illustrates "one scenario of how the Specific Plan could be implemented." NOP at Exhibit 4. Until the Project is actually planned by the applicant, it is premature to prepare an NOP and solicit public comment.

- *Total Visitor Use.* The NOP must identify the maximum number of visitors that will be accommodated by the proposed Project. Moreover, because the Project would also generate day users, the EIR must identify the total number of visitors to the Project expected upon build-out. This data should be identified for each facility and by season.

- *Total Ski Hill and Residential Use.* The NOP must identify the following information under existing and Project build out: (1) maximum ski hill capacity, expressed in terms of uphill lift capacity; (2) number of daily skiers; (3) day-time population of the Valley; (4) seasonal-peak residential population; (5) year-round residential population, by season and month; and (6) number of residential units in Squaw Valley. The NOP must also identify the number of residential units forecast for the Valley by 2030, not including the proposed Project.

- *Mountain Adventure Camp.* The Project includes an indoor amusement park yet this facility is barely described at all. The prior NOP states that the Mountain Adventure Center was to include a summer performance area indicating that this facility could be a venue for concerts and plays, yet the revised NOP does not describe the uses of this Project component. Details relating to the amusement park must be included in the NOP.

- *Height of Structures.* The NOP states that the plan area would be developed with several buildings ranging in height from 35 to 108 feet tall. NOP at 2. The NOP also states that the Project allows podium parking that would be 21 feet above ground level. *Id.* The NOP 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 (NOP at 7) but the NOP does not describe this important facility.

- *Emergency Access Routes.* The NOP states that a potential Emergency Vehicle Access connection to the Resort at Squaw Creek "is being considered." NOP at 8. Emergency access to Squaw Valley is critical for public safety. The NOP must explain why emergency access routes may not be included in the Project and examine the public safety impacts if such a route is not developed. Further, if such a route is included, the NOP must include sufficient detail to enable the public to assess the safety aspects of the proposal and thoroughly assess the biological, growth inducing, and other impacts of a new road.

- *Parking.* The NOP does not identify the amount or location of parking that would be provided by the Project.

- *Water Supply*. The NOP mentions the possibility of the creation of a new water supplier being established to provide water for the Project (NOP at 8) but provides no further information. According to the Tahoe Daily Tribune, a 2009 study concluded that supplying water from the Martis Valley appears to be an option that will likely be considered.[2] The NOP must disclose potential sources of water and identify the potential environmental impacts from each proposed source.

- *Water Infrastructure*. The Project would include either a 0.7 or a 1.5 million gallon water storage tank depending on whether the 0.7 million gallon tank is capable of being connected to, and work in unison with, the existing 1.0 million gallon tank. NOP at 9. The size of the new water tank must be resolved and disclosed now as there is the potential for a massive increase in water storage. In addition, if the new tank does have the capacity of 1.5 million gallons, the NOP must disclose whether the existing 1.0 million gallon tank would be decommissioned. If not, the Project has the potential to be tremendously growth-inducing.

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

- *Snow removal*. The Project includes the potential for active melting of snow in bunkers using various heat sources. NOP at 9. The NOP must identify the potential energy sources that would be required to melt snow and evaluate the environmental impacts associated with this energy use.

- *Actions and Entitlements.* The NOP 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. NOP at 14. The NOP does not 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 NOP in order to understand the implications for Squaw Valley and the region.

[2] http://www.tahoedailytribune.com/northshore/10170638-113/valley-squaw-source-district

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. 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 explains that the separate Phase I Project component is no longer included in the proposed Project and that the Project will be considered in its entirety without separate analyses of early phases. NOP at 1. It is not clear from this statement whether the County will be preparing a programmatic or project-specific EIR for the Project. The County must clarify its approach to environmental review.

In the event that the County is contemplating preparation of a program EIR, this approach 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.[3]

1. Biological Resources

Numerous biological communities and habitat types occur in the Project area. The Initial Study acknowledged 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. The NOP asserts that most of the plan area is already developed with parking lots and scattered buildings (at 11), but it does not disclose the status of East Parcel. According to the 2014 Specific Plan, East Parcel has a perennial stream, seep, wetland swale and seasonal wetlands. *See* Figure 7.8 at page 7-11. The NOP does not provide any indication as to the extent of impacts to these communities and habitats. 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 alternatives and measures to eliminate or substantially reduce the Project's significant impacts. 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 California Department of Fish & Wildlife is a good starting point, but it is not sufficient to provide the level of detail necessary for the EIR. The EIR must also assess whether any wetlands are present on the Project site, including but not limited to any existing or anticipated wetland delineations completed by the U.S. Army Corps of Engineers.

Mitigation measures for impacts to biological resources must be supported by the U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife, and the U.S. Army Corps of Engineers.

[3] The Project applicant requests, among other actions and entitlements, the approval of a development agreement. NOP at 14.

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 would occur both from construction activities and the ongoing development projects. Although portions of the Project area are located in a 100-year floodplain (NOP at 13), 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 NOP does not identify the amount of water that would be required to service the proposed Project or whether adequate supplies exist within the Project area. 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. As discussed above, it is our understanding that one potential source of water for Squaw Valley is the Martis Valley aquifer. Should the applicant rely on this source, it would be a massive infrastructure project. The Squaw Valley EIR must provide a comprehensive analysis of the environmental impacts associated with this infrastructure project.

With respect to water supply facilities, the NOP's 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." NOP at 9. 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 community, 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 must 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. NOP at 11. In addition, two 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. *Id.* at 12.

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 NOP's 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"). 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. While technically not located within the Tahoe Basin, Squaw Valley clearly cannot be separated from its larger regional context. *See id.* at § 15125(d) (an EIR must evaluate any inconsistencies between the Project and regional plans for the protection of the Lake Tahoe Basin). To this end, the EIR should identify all relevant regional plans, including

applicable plans within the neighboring Lake Tahoe Basin, and include a detailed assessment of the Project's inconsistencies with these plans.

As mentioned above, the NOP acknowledges that amendments will be required for the General Plan and Existing Ordinance. The NOP does not, however, identify the specific amendments that are contemplated. The EIR must provide this information.

It is our understanding that the County is in the process of updating its General Plan/Community Plan for the Tahoe Basin. The County had been holding workshops to develop zoning, development standards and design guidelines for each area within the Basin.[4] Given the Project's potential inconsistencies with the County General Plan and the need for amendments to the Plan, we strongly encourage the County to defer further action on the proposed Project until such time as the County completes its General Plan Update. The update of the General Plan would give the County an important opportunity to comprehensively evaluate the amount, type, and location of new development that should occur in Squaw Valley consistent with community values, environmental constraints, and the availability of essential services and public facilities.

7. Population and Housing

The NOP acknowledges that the Project would increase the population of Squaw Valley (NOP at 11), but it provides insufficient 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 EIR must also disclose the maximum amount of development proposed and compare that to the maximum allowable under the Existing Ordinance.

Finally, the Project could result in substantial growth in the area or in nearby communities and the EIR must analyze the impacts of such induced growth. The growth inducing analysis in the EIR must include, *inter alia*: (a) an estimate of the amount, location, and time-frame of growth that may occur as a result of the Project and (b) identification of mitigation measures or alternatives to address significant direct and indirect impacts.

[4] http://www.laketahoenews.net/2012/07/placer-county-reports-on-general-plan/

8. Transportation

The EIR must provide a comprehensive analysis of the Project's traffic impacts. It will be important for the EIR consultants to accurately identify trip generation data for each of the Project's uses, e.g., day visitors to the mountain, including day skiers, indoor amusement park visitors, retail shoppers, and restaurant customers. 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. Using these trip generation figures, the EIR must then analyze traffic levels for each phase of development and buildout. 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 would be provided upon each phase and upon build-out of the Project. The document must also distinguish between the parking expected to handle day skiers/visitors, the parking associated with residential uses and the parking intended for employees.

The EIR must 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 emissions, noise, and water quality. If the Project does not include a robust transit program—and it's entirely unclear whether it does —one should be developed as mitigation for the Project's many significant environmental impacts.

The Initial Study explained 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.

9. Air Quality

The Initial Study acknowledged 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. The NOP states that construction-related air pollutant emissions would be temporary and intermittent, despite the fact that the Project proponents anticipate a 25-year construction period. NOP at 10. In any event, CEQA requires analysis of temporary impacts. Guidelines § 15126.2(a) (agency must analyze both short- and long-term impacts).

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 and Executive Order S-3-05. The Initial Study acknowledged 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 greenhouse gas ("GHG") emissions. Yet, the NOP still does not 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 applicable plans, policies or regulations that the Project would be required to be consistent with.

EO S-3-05 committed the state to reduce emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. The proposed Project must be designed with this goal in mind. Therefore, the County must demonstrate that the Project will, at a minimum, proportionally meet these targets, or attempt to develop a feasible alternative that would.

In addition, we strongly urge the County to examine the likely effects of climate change on the Project. For example, climate change will likely reduce snowpack and therefore limit water supplies. It is 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 applicable to the Project.

11. Wildland Fire, Emergency Response and Evacuation

According to the Initial Study, 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 12. Although the increase in traffic and road closures would result in a potentially significant impact, the NOP does not identify any thresholds of significance or suggested methodology for analyzing this critical public safety impact.

Nor does the NOP disclose that access to Squaw Valley is provided via a single two-lane highway. State Route 89 is the only egress for the entire Valley. 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 Initial Study's assertion that it may not be possible to mitigate the Project's significant traffic impacts. IS at 2-58. The analysis should include any fire simulations that have been conducted for Squaw Valley.

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 entail environmental impacts, the EIR must analyze those impacts as well.

For each service, the EIR should provide the following information: (a) present capacity of the service including all relevant facilities, (b) current demand, (c) current remaining capacity or deficit, (d) projected need under cumulative conditions, and (e) 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, solid waste, and propane service) 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.

Of particular concern is the applicant's proposal to store propane on the East Parcel. Unfortunately, the NOP provides no information about the Project's increase in propane use or where and how this propane would be stored. In addition to the physical impacts resulting from the installation of propane tanks (e.g., loss of sensitive habitat), the use of propane can result in a significant increase in criteria air pollutants and GHG emissions. Propane storage tanks can also pose a tremendous public health and safety risk resulting from tank explosions and associated wildland fires as the recent propane tank explosions in Redwood City and Florida demonstrate.[5][6]

The EIR must identify the increase in demand for services, utilities and facilities and the environmental impacts from these services and utilities.

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).

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[5] *See* http://sanfrancisco.cbslocal.com/2013/09/27/redwood-city-propane-tank-explosion-shuts-down-el-camino-real/; accessed March 14, 2014.

[6] *See* http://www.npr.org/blogs/thetwo-way/2013/07/30/206905209/explosions-and-fire-at-propane-tank-plant-injure-at-least-7; accessed March 14, 2014.

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.

C. The EIR Should Identify and Analyze a Reasonable Range of 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 extraordinary natural resources in Squaw Valley and the Tahoe region, the County should consider several alternatives to the proposed Project. Unfortunately, the NOP does not identify *any* Project alternatives. Although the NOP does 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 would result in extensive environmental impacts. Accordingly, the EIR must consider a less intensive level of development on the Project site.

III. 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 keep this office informed of all contracts, notices, hearings, staff reports, briefings, meetings, and other events related to the proposed Project.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Laurel L. Impett, AICP, Urban Planner

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

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March 24, 2014

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: Revised Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan.

Dear Ms. Krach:

Thank you for the opportunity to comment on the Revised Notice of Preparation ("Revised 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"). On November 8, 2012, SVLOA submitted a comment letter on the original Notice of Preparation for the earlier version of the Project. SVLOA hereby incorporates its November 8, 2012 letter by reference, and requests that the County consider those comments as though fully set forth herein.

SVLOA appreciates the community outreach conducted by the Project applicant since the issuance of the original NOP. The Project applicant has consulted with various community groups, residents, and stakeholders, and has revised the Project to address many of the concerns raised regarding the original project proposal. However, the Project still presents the potential for significant environmental impacts, which must be fully analyzed and appropriately mitigated through the EIR. SVLOA accordingly submits the following additional comments on the scope and content of the EIR for the Project.

CONSTRUCTION AND DEVELOPMENT RELATED IMPACTS

Construction during Project build-out has the potential to create noise and traffic impacts. In order to lessen these impacts to a less-than-significant level, SVLOA requests that the EIR analyze the following mitigation measures:

- Because of the proximity of sensitive receptors, the acoustics associated with the Valley, and the large tourist base, noise generated during construction activity may have particularly significant and unique impacts. More restrictive construction noise controls than those typically imposed for Projects in Placer County should be evaluated as feasible mitigation measures in the EIR, including but not limited to, noise generating construction activities allowed only between the hours of 9:00 am and 5:00 pm.

- Require implementation of a construction traffic control/traffic management plan including the following elements:
  - Insure that at least one lane will remain open during construction and that there will be no road closures;
  - No lane closures during peak travel hours (8-10 a.m. and 3-6 p.m.);
  - Pedestrians and bicyclists should be provided with access and passage through, or around, the temporary traffic control zone at all times;
  - Require worker parking in designated staging areas; and
  - Require coordination with emergency service providers.

TRANSPORTATION/PARKING

Given the high potential for significant traffic impacts resulting from Project build-out, SVLOA requests that the EIR evaluate a mitigation measure/alternative that would create a designated mass transit route/corridor within the Project area, reserved for bus, tram, and similar mass transportation. Normal automobile traffic would be restricted from utilizing this route.

Designation of an exclusive mass transit corridor at this stage of Project development and design is crucial to insure the future viability of mass transit in the Valley. If a mass transit corridor is not integrated into the Project design, as part of the EIR, it is highly unlikely that one could ever be built, inevitably leading to cumulative transportation impacts.

LAND USE

The revised Project has eliminated the proposed building from Parcel O of the Project area. However, as explained in SVLOA's original comment letter, any future development on Parcel O has the potential to create significant aesthetic impacts, land use conflicts, and other environmental impacts. In order to avoid these potential impacts, and any piecemealing resulting from future project proposals, SVLOA requests that the EIR analyze restrictions on future development of Parcel O to be limited to the footprint, height and scale of the existing buildings.

CUMULATIVE IMPACTS/GROWTH INDUCING IMPACTS

The Project has the potential to result in cumulative and growth inducing impacts associated with service facilities, including internet access, natural gas, and propane facilities. SVLOA requests that the EIR analyze these impacts and potential mitigation measures that would allow surrounding developments to utilize service facility upgrades developed by the Project.

Thank you again for your attention to our comments.

Respectfully,

Greg C. Gatto

cc: SVLOA Board

TAVERN INN

Condominium Property Association • Olympic Valley, California

VIA E-MAIL AND FEDERAL EXPRESS

March 20, 2014

Ms. Maywan Krach
Community Development Technician
Placer County, Planning Services Division
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Comments of the Tavern Inn Condominium Association in Response to Revised NOP of a Draft EIR for the Proposed Village at Squaw Valley Specific Plan

Dear Ms. Krach:

I write on behalf of the Board of Directors of the Tavern Inn Condominium Association ("Tavern Inn Board") in response to the Revised Notice of Preparation ("NOP") issued by the County regarding the Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan ("Draft EIR"). The Tavern Inn community consists of 56 condominium units located directly across Squaw Valley Road from the East Parcel portion of the proposed project. The Tavern Inn Board is concerned about the adverse impact the proposed development of the East Parcel will have on the Tavern Inn community and the local neighborhood. We write to request that the County, in preparing the Draft EIR, fully consider these potential impacts, as well as consider mitigation measure and alternatives. Our specific concerns and requests regarding the East Parcel are outlined in this letter.

As a preliminary matter, we note that the East Parcel has received little attention and review in the planning process to date. For example, it is ignored in the October 12, 2012 Initial Study. Yet the revised Specific Plan proposes intensive development of this 9 acre parcel including employee housing consisting of 264 bedrooms, three levels of parking for 1,000 vehicles, and a shipping and

receiving facility. We also understand that the project applicant is considering locating the propane storage for the Village on the East Parcel. The proposal to locate propone storage on the East Parcel must be evaluated in the Draft EIR, including impacts associated with construction, operation, and maintenance of the propane tanks and associated plumping. The scale and scope of the proposed development of the East Parcel seems inconsistent with the surrounding neighborhood, and it would radically change the east end of Squaw Valley. This cumulative impact must be considered as part of the Draft EIR as well.

Aesthetics

The impact on aesthetics of the East Parcel development will be significant. Almost the entire parcel will be covered by a structure or set of structures up to 35 feet high. The structure(s) will abut Squaw Valley Road with virtually no setback. With the location of the public services building and school across the road, the effect will turn this stretch of Squaw Valley Road into an urban canyon similar to what one might experience in San Francisco, but out of place in Olympic Valley. The structure(s) will be visible from Tavern Inn, Squaw Valley Academy and from homes on the north side of Squaw Valley Creek. The structure(s) will also be visible from the creek and nearby valley and mountain trails. The Draft EIR must evaluate these impacts. Mitigation measures the Draft EIR should consider include: (1) a minimum 50-foot setback from Squaw Valley Road for all structures; (2) staggering of structures that abut Squaw Valley Road to avoid the visual effect of a wall; (3) landscaping along Squaw Valley Road that screens the development from the road and neighbors; (4) design for the employee housing units consistent with a residential neighborhood in the mountains rather than a city apartment building; (5) ground level parking only for residents that is intermixed with the housing units; (6) reducing the height of the proposed structures so they do not obstruct views; (7) locating the shipping and receiving facility so that it is not visible from the road; and (8) reducing the number of employee housing units and bedrooms. Alternatives that should be considered include: (1) re-locating the shipping and receiving facility to the main Village development or outside Olympic Valley and (2) re-locating the day-skier parking to the main Village area or outside Olympic Valley.

Traffic

The impact on traffic from the proposed development of the East Parcel will be significant. The portion of Squaw Valley Road servicing the East Parcel is the busiest stretch of the road. Traffic on this section tends to speed when the road is not jammed, and the road is wide with poorly delineated lanes. Snow removal and storage in the winter is also a problem along this stretch of the road. The addition of hundreds of new residents, 1,000 parking places, and a shipping and receiving facility risks creating traffic chaos on winter weekends and at other high-use times. In addition, the proposed main entrance to the East Parcel development

appears to be located directly across the street from the main entrance to Tavern Inn. Even at relatively low-traffic times, ingress and egress from Tavern Inn can be difficult, and the proposed East Parcel development will only compound this problem. Mitigation measures that should be considered in the Draft EIR include: (1) designing ingress and egress for the East Parcel that minimizes impacts on traffic flows along Squaw Valley Road and does not interfere with ingress and egress for Tavern Inn; (2) re-locating the ingress and egress to the East Parcel and the shipping and receiving facility so that it is not across the road from Tavern Inn; (3) prohibiting trucks waiting to enter the shipping and receiving facility from parking or stopping along Squaw Valley Road; (4) limiting the operation of the shipping and receiving facility to Monday through Friday from 8:00 a.m. to 5:00 p.m.; (5) adding increased enforcement of traffic laws along this portion of Squaw Valley Road; (6) decrease the number of available parking spots at the East Parcel; and (7) require that space be provided within the development for storage of snow removed from Squaw Valley Road. Alternatives that should be considered include: (1) re-locating the shipping and receiving facility either to the main Village development or outside Olympic Valley and (2) re-locating the day-skier parking to the main Village area or outside Olympic Valley.

Noise

The impact on noise from the proposed East Parcel development will be significant. The proposal anticipates the addition of hundreds of new residents, a large parking structure, and a shipping and receiving facility, with all of the associated activities and related noises. In addition, there will be significant noise associated with construction activities. Scaling back the development by (1) re-locating the shipping and receiving facility either to the main Village development or outside Olympic Valley and (2) re-locating the day-skier parking to the main Village area or outside Olympic Valley would alleviate a significant amount of the potential noise impacts. If these facilities are re-located, then the employee housing component could be re-designed in a manner that would lead to less noise. Other measures to be considered include: (1) designing ingress and egress for the East Parcel that minimizes impacts on traffic flows along Squaw Valley Road and reduces traffic related noise; (2) prohibiting trucks waiting to enter the shipping and receiving facility from parking or stopping along Squaw Valley Road; (3) limiting the operation of the shipping and receiving facility to Monday through Friday from 8:00 a.m. to 5:00 p.m.; (4) reducing the number of employee housing units and bedrooms; (5) adopting measures that ensure construction noise does not exceed levels set by the County Code and restricting construction activity to Monday through Friday from 8:00 a.m. to 5:00 p.m.; and (6) installing sound walls.

Air Quality

Air quality impacts associated with increased traffic and construction at the East Parcel will be significant. The residents of Tavern Inn already suffer from poor air quality on high-traffic days when cars back up in the morning waiting for traffic to merge at the junction with the road from Squaw Creek Resort and in the afternoon when traffic waits for the light at Route 89 to change. The proposed development—particularly the parking and shipping and receiving facility—will add to the existing problem. In addition, there will be significant air quality issues during the construction phase. Scaling back the development by (1) re-locating the shipping and receiving facility to the main Village development or outside Olympic Valley and (2) re-locating the day-skier parking to the main Village or outside Olympic Valley would avoid adding to what is already a poor air quality situation at the east end of the valley. Mitigation measures to be considered should include: (1) designing ingress and egress for the East Parcel that minimizes impacts on traffic flows along Squaw Valley Road so that traffic does come to a complete stop; (2) prohibiting trucks waiting to enter the shipping and receiving facility from stopping or parking along Squaw Valley Road with their engines running; (3) limiting the operation of the shipping and receiving facility to Monday through Friday from 8:00 a.m. to 5:00 p.m.; (4) prohibiting vehicles waiting in the shipping and receiving area from idling; (5) using only zero-emission buses or vehicles to ferry guests and employees between the East Parcel and main Village; (6) require the use of only zero-emission vehicles to ferry goods from the shipping and receiving facility to the Village; and (6) require monitoring of air quality on high-traffic days and closing the parking facility on days when the air quality situation is poor.

Forest and Biological Resources

The Revised NOP notes the presence of approximately 350 trees on the East Parcel. The impact of the proposed development on these trees must be evaluated and mitigation measures should be considered that would eliminate the need to remove any of these trees. In addition, impacts the East Parcel development will have on the biology of Squaw Creek, which abuts the north side of the parcel, must be evaluated and mitigation measures to eliminate adverse impacts must be assessed. Squaw Creek has suffered over the years from the development that has occurred in Olympic Valley—for example, the trout population has been reduced. The development of the East Parcel should not add to the creek's problems. Indeed, mitigation measures should be proposed that would improve biological habitats along this portion of the creek. In addition, impacts from the development on other wildlife and plant species must be evaluated. Finally, impacts on biological resources associated with locating propone storage tanks on the East Parcel must be fully assessed and appropriate mitigation measure evaluated. This includes impacts associated with installing and maintaining the pipes and other plumbing needed to deliver the propane from the East Parcel to the end-users in the Village. Locating the

propane storage at the Village rather than the East Parcel should be considered as an alternative because it would eliminate all impacts on biological resources associated with installing and maintaining the pipes and plumbing needed to connect the two locations.

Hazardous Materials and Hazards

The impact on the health and safety of nearby residents associated with locating the propane storage for the Village at the East Parcel must be evaluated and mitigation measures assessed. Discussion of propane storage was not included in the revised Specific Plan; however, at a public meeting on January 18, 2014, the project applicant announced it was their plan to locate propane storage at the East Parcel. The Draft EIR must evaluate all impacts associated with the proposal to locate propane storage on the East Parcel, including impacts associated with installing and maintaining the infrastructure needed to transfer the gas from the East Parcel to the Village. The geology of the site must also be evaluated to determine if it is a suitable location for propane storage.

Public Services and Utilities

The adequacy of the available water supply has already been identified as an issue associated with the proposed project. Locating employee housing consisting of up to 264 bedrooms at the East Parcel rather than outside Olympic Valley will add significantly to the impact on water supply. This impact and appropriate mitigation measures and alternatives must be assessed in the Draft EIR.

Water Quality

The impact that development of the East Parcel will have on water quality must be evaluated in the Draft EIR. Of particular concern are impacts from sediment and pollutants discharged into Squaw Creek during the construction phase, as well as from the development itself. In addition, impacts on water quality associated with locating the propane storage on the East Parcel, including the plumping system that will connect it to the Village, must be evaluated. This includes impacts on Squaw Creek and wetlands at the East Parcel and along the entire route of the pipeline connecting the East Parcel with the Village. These impacts could be greatly reduced or eliminated if the propane storage was located at the Village rather than the East Parcel, and this alternative should be evaluated in the Draft EIR.

Cultural Resources

The Revised NOP notes that "at least one recorded prehistoric site exists within the vicinity of the East Parcel." The development of the East Parcel on this and other potential archaeological sites must be evaluated in the Draft EIR and appropriate mitigation measures assessed.

Greenhouse Gases

The East Parcel development combined with the expansion of the Village could lead to an increase in greenhouse gas emissions. The impact on greenhouse gas emissions must be evaluated and mitigation measures assessed.

Geology

The geology of the East Parcel must be evaluated to determine if it is a suitable and safe location for the proposed development.

Cumulative Impacts

As noted in the preliminary statement, the proposed development for the East Parcel appears inconsistent with surrounding uses, which are primarily residential. While the public services facility and Squaw Valley Academy are located in this area, they do not fundamentally change the residential character of the neighborhood. However, the cumulative effect of adding the proposed East Parcel development would certainly result in a fundamental change in the character of the neighborhood. It would change the neighborhood from mountain residential to urban and commercial. This cumulative impact must be assessed and mitigation measures and alternatives must be considered in the Draft EIR including: (1) scaling back the size the East Parcel development and (2) re-locating portions of the development such as the day-skier parking and shipping and receiving facility either to the Village or outside of Olympic Valley.

*****

The Tavern Inn Board appreciates the County's consideration of this letter in the process of developing the Draft EIR. We are available to answer any questions the County may have regarding this letter or our concerns.

Very truly yours,

Peter M. Morrisette
Vice President
Tavern Inn Condominium Association
6317 Wood Drive
Oakland, CA 94611

Cell: 510-410-0170
petermorrisette@yahoo.com

FRIENDS OF THE WEST SHORE

Placer County Planning Department
Maywan Krach, Community Development Technician
3091 County Center Drive
Auburn, CA 95603
cdraecs@placer.ca.gov

March 24, 2014

Subject: Proposed Village at Squaw Valley and potential adverse impacts in the Lake Tahoe Basin

Dear Mr. Krach:

The Friends of the West Shore appreciates this opportunity to provide comments on the Revised Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for the Proposed Village at Squaw Valley. We also incorporate comments submitted on the Notice of Preparation by the Friends of Squaw Valley and Sierra Watch.

The Friends of the West Shore (FOWS) works towards the preservation, protection and conservation of the West Shore, our watersheds, wildlife and rural quality of life, for today and future generations. FOWS represents community interests from Tahoma to Tahoe City. We are concerned with the extent of proposed development along the West Shore, North Shore, and areas bordering the Lake Tahoe Basin (such as Squaw Valley), and the cumulative impacts of these multiple projects on our communities. Cumulative impacts from these projects include increased Vehicle Miles Traveled (VMT) in the Basin, increased water and air pollution, noise, and other adverse impacts associated with increasing visitor and resident populations, both in the Basin and surrounding areas. These impacts must be adequately analyzed in the EIR.

Unfortunately, the NOP includes no information regarding the range of alternatives to be evaluated in the EIR, including an environmentally superior alternative. We are concerned that the alternatives will focus heavily on what appears to be the preferred options of the applicant, Squaw Valley Real Estate LLC. – that being significant development in Squaw Valley. Previous estimates of the proposed development suggest the proposed project has a footprint that is roughly eight times the size of the existing Intrawest Village.[1] This is not just another 'project,' but rather a plan update that will forever change Squaw Valley.

The revised NOP states the proposed project is smaller than that proposed in 2012; however, this is irrelevant. The NOP must include the proposed project only, and compare that to other alternatives. If the 2012 proposal is one of the alternatives, then it should be listed as such (along with other as-yet-undefined alternatives). Including the references to the 'reductions' between the proposed project and 2012 proposal is misleading to the public. The proposed project results in significant increases in development, traffic, and other impacts which must be framed objectively, not compared to 'what could have been larger.' For this reason, it is inappropriate for the NOP to draw comparisons to the 'previous proposal.'

[1] http://www.sierrawatch.org/squaw-rally/: "New village neighborhoods and high-rise hotels would spread from the Northwest corner of the valley down to the edge of the golf course, with a footprint about eight times the size of the existing IntrawestVillage."

FOWS is concerned with the following (detailed comments follow):

Project Purpose and Range of Alternatives:

- Project Purpose and Goals:
- Need for increased, true range of alternatives
- Failure to consider important environmental and social changes since 1983 (year of Specific Plan)

Environmental Impacts:

- Impacts to traffic in the Lake Tahoe Basin
- Water supply and impact to aquifer levels and surrounding communities
- Air and water pollution
- Increases in noise
- Impacts to scenic views
- Placement of 1,000's more people in hazardous area (this does not count day visitors) and increased difficulty of emergency access
- Cumulative impacts to Basin and adjacent areas

Alterations to existing community character, neighborhoods, and lifestyle:

- The proposed project will forever alter the demographics in the area;
- Impacts to existing residences
- Impacts to current property values
- Impacts to mountain culture, which is highly valued by locals and visitors;
- Impacts to existing small/local businesses;

We hope these comments will assist Placer County with the development of a comprehensive, technically-adequate EIR, which also takes into account a variety of alternative options and which reflects the desires of the local community. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President,
Friends of the West Shore

Jennifer Quashnick
Conservation Consultant,
Friends of the West Shore

Attachments: 4/9/2013 FOWS comments on Squaw Valley NOP
Dangerous Developments, Sierra Nevada Alliance, 2007.
Friends of Squaw Valley and Sierra Watch Public Survey, 2013

Cc: Laurel Ames, Tahoe Area Sierra Club
Ed Heneveld, Friends of Squaw Valley
Tom Mooers, Sierra Watch

I. Project Purpose and Range of Alternatives:

1. Project Purpose and Goals:

The NOP's project description is confusing and fails to identify exactly what will be analyzed. The NOP states that the proposed Project is the "Squaw Valley Specific Plan project." The NOP also states: "The proposed Specific Plan is the first specific plan proposed under the *Squaw Valley General Plan and Land Use Ordinance* (SVGPLUO), which was adopted by Placer County in 1983. The Specific Plan proposes to amend the SVGPLUO to comprehensively plan development of a recreation-based, all-season, mountain resort community." (NOP, p. 2).

In essence, it appears the proposed project is not consistent with the 1983 SVGPLUO because it requires an amendment to the SVGPLUO, however the NOP fails to explain what amendments are needed. Further, the project applicant is Squaw Valley Real Estate LLC (NOP, p. 1), a corporation that appears to be proposing a specific *project* that is so large and all-encompassing as to make any long term plan almost useless. The proposed project would basically *replace* any long term Plans for Squaw Valley, thereby taking a decision that should be made by the local community away from them, and placing it in the hands of the project applicant.

In fact, as this proposed project will forever change the appearance, neighborhood, views, environment, and the community of Squaw Valley, it is distressing that a project is being proposed now, rather than first allowing the community to review and consider updates to the 30-year old 1983 Plan. This puts the cart before the horse, forcing the community to respond to the desired interests of a large corporation, rather than having the opportunity to first objectively consider their community's own future and then informing the developer of the community's vision.

Making matters worse, the NOP fails to clearly explain whether the EIR will perform a program/plan level review, or a project-level review. There are clearly different requirements and legal implications associated with the level of required review.

This confusion between the Plan- versus Project-level review also impacts the economic considerations. As a Plan amendment, the proposal should be based on the Plan for the community, not the financial objectives of the project applicant. The latter should only be considered during a project level review, whereas a plan amendment should meet the objectives of the Plan. Otherwise, this places the Squaw Valley community at the will of the developer's whim based on the developer's financial considerations (e.g. percent of ROI [Return on Investment]), rather than an honest community decision that can encompass other issues, including the health of the environment, safety of the public, and allow community members to propose their own ideas for the future of Squaw Valley.

That said, according to the October 2012 Initial Study (IS) page 5:

> The purpose of the SVGPLUO is to "ensure that Squaw Valley is developed into a top quality, year-round, destination resort." Further, the SVGPLUO is intended to ensure that the area has "the capacity to serve and house the optimum number of tourists, visitors, and

residents…without adversely impacting the unique aesthetic and environmental assets of Squaw Valley." [Emphasis added].

The IS describes the objectives for the "plan area" (seemingly also the project area) as noted below. We note the objectives repeatedly emphasize the cultural and environmental setting and the Valley's history as important objectives:

The following Guiding Goals of the Specific Plan provide the underlying objectives for the plan area:

- Implement the guidelines contained in the SVGPLUO to realize a balanced, vital, year-round destination resort center consistent with the build-out envisioned in the plan.
- Respect and honor the cultural and environmental setting establishing an optimum level of development consistent with the Valley's history and current resource management and development practices.
- Revitalize and enhance the Village areas to create a series of compact, tourist-related mixed-use neighborhoods that are connected, safe, and walkable. The following objectives provide additional detail regarding the intent and nature of the proposed Specific Plan:
- Develop a project that draws visitors year-round and enhances the economic base of the community by offering a diversity of recreational, residential, commercial, and lodging options beyond those specifically geared toward the winter season.
- Concentrate development in already disturbed or developed areas.
- Provide a diversity of visitor accommodations and resort residential units.
- Provide access from the plan area to passive and active recreational activities that can be enjoyed by the entire Olympic Valley community.
- Provide an array of services and amenities within the plan area to minimize the reliance on vehicles.
- Provide for safe and efficient access to and circulation through the plan area that meets the mobility and parking needs of guests, employees, day skiers, visitors, goods, and services.
- Create and maintain a complete "multi-modal" transportation system to reduce dependency on automobiles and to minimize emissions of air pollutants and greenhouse gasses.
- Provide affordable opportunities for employees to live in proximity to their place of work, consistent with the County Housing Element.
- Protect Squaw Creek by providing appropriate open space corridor setbacks, limiting activities that could degrade water quality or the stream and riparian habitat within the corridor, and providing for restoration and enhancement of the stream's function.
- Preserve and enhance important natural and scenic resources within and near the plan area through conservation, enhancement, and, where removal or degradation of such resources cannot be avoided, mitigation.
- Minimize risks from hazards associated with the natural setting, such as fires and avalanches.
- Provide visual access to the principal views of mountain peaks and hillsides to reinforce the connection of the Village to the mountain environment. [Emphasis added].

The NOP states that the proposed Specific Plan is the first specific plan proposed under the SVGPLUO adopted in 1983[2] (notably approx. 30 years ago), yet it proposes to significantly *amend* the 1983 Plan. Further, as the draft Specific Plans (2013 and 2014) note, the Specific Plan will supersede the SVGPLUO regulations:

> The land use designations and zoning, development standards and design guidelines in this Specific Plan supersede the land use designations, public works standards and other applicable regulations of the SVGPLUO and other applicable County regulations.[3]

The proposed changes need to be treated like the significant amendments they would be. In addition, the NOP states: "The Specific Plan proposes to amend the SVGPLUO to comprehensively plan development of a recreation-based, all-season, mountain resort community." (p. 2). However, the EIR must correctly include the rest of this statement, which requires that this development not adversely impact the "*unique aesthetic and environmental assets of Squaw Valley*." (p. 4 of the SVGPLUO). The 1983 Plan also notes that future decisions should be based on "*sound social, economic, and environmental practices*." As a result, we note that the purpose, and resulting range of alternatives considered in the EIR, must elevate these components as well. In other words, as noted previously, the purpose of the Plan update cannot be based on meeting the applicant's desired economic returns. Squaw Valley is a community with a very specific mountain culture, with neighborhoods of full and part time residents, with unique and unmatched mountain views and scenery, with sensitive lands, wetlands, creeks, wildlife habitat, and other unique features. All of these other parameters must be considered in this amendment. In fact, the 1983 Plan notes: "*…the quality of the permanent residential community must not be adversely affected by the detrimental effects of a short term, high intensity use by a transient, seasonal population.*" (p. 5).

The proposed project would draw in 1,000's of additional overnight guests (1,757 new rooms, with an assumed average occupancy of 2.5 residents/room[4] - which means roughly 4,393 more occupants) to a community with less than 900 full time residents.[5,6] Such a massive project will overwhelm, and certainly adversely

[2] "The proposed Specific Plan is the first specific plan proposed under the *Squaw Valley General Plan and Land Use Ordinance* (SVGPLUO), which was adopted by Placer County in 1983. The Specific Plan proposes to amend the SVGPLUO to comprehensively plan development of a recreation-based, all-season, mountain resort community." (p. 2)

[3] January 2014 Specific Plan draft, Introduction, p. 1-2. http://www.placer.ca.gov/departments/communitydevelopment/planning/villageatsquawvalleyspecificplan

[4] According to the Initial Study, p. 1-4.

[5] "Overall, project development has been reduced by approximately one-third since the October 2012 NOP was released. Maximum unit counts have been reduced from 1,295 to 750, and total maximum bedrooms have been reduced from 3,238 to 1,493. The project footprint has been reduced from approximately 101 acres to approximately 94 acres (85 acres in the main Village area and approximately 9 acres referred to as

impact, the existing community, contrary to the requirements of the 1983 Plan. The EIR must clearly analyze what these impacts will be.

Below is an excerpt from the 1983 Plan:

> It is the purpose of the 1983 Squaw Valley General Plan to establish a planning framework to ensure that Squaw Valley is developed into a top quality, year-round, destination resort. The Plan area shall have the capacity to serve and house the optimum number of tourists, visitors, and residents set forth in this Plan without adversely impacting the unique aesthetic and environmental assets of Squaw Valley.
>
> Sound conservation and development practices as stated or implied in the Placer County General Plan and which this plan accepts as planning principles, require that the following guidelines be followed in the future development of Squaw Valley:
>
> (1) Both the quality and quantity of development must be planned to conserve, protect, and enhance the aesthetic, ecological and environmental assets of Squaw Valley.
>
> (2) Future development in Squaw Valley should occur only where public facilities and services, including transportation, can be efficiently provided.
>
> (3) Intense utilization of already disturbed areas shall be promoted and preferred to fringe development or non-contiguous development of previously undisturbed areas.
>
> (4) Decisions regarding future development should be based upon sound social, economic, and environmental practices.
>
> (5) In planning for the future growth and development of Squaw Valley, an optimum balance of activities and facilities, which recognizes the strengths, weaknesses and inter-relationships of various segments of the Truckee-Squaw Valley and Tahoe area economies should be encouraged.

It appears the original NOP[7] did not propose the commercial/employee housing component now shown for the East Parcel, 1.3 miles away from the original project area.[8] The NOP appears to wash over this change and dismisses any need

the East Parcel)" (NOP, p. 1). NOTE: this summary is incorrect, as it fails to include the additional 264 rooms on the East parcel, bringing the total number of new rooms to 1,757 (see NOP, p. 7).

[6] "Because Squaw Valley is considered a vacation resort, its population varies daily and seasonally. In 2010, Squaw Valley had a population of 879 permanent residents (Placer County 2012a). The daily population of Squaw Valley typically increases far above the residential population, and peaks in the winter. Additionally, large numbers of employees are required to meet the daily demands of the Squaw Valley ski resort; some of these employees live in the Valley while others commute from nearby areas like Truckee." (Initial Study, p. 2-49)

[7] October 2012 NOP; p. 5, Exhibit 3, "Concept Plan"

[8] "Although the project has since changed, the County does not plan to revise the Initial Study because the project's potential environmental effects are still adequately considered, although the magnitude of some

to update the Initial Study: *"Additional information has also become available regarding several project components, including plans for employee housing," (p. 1),* yet this is a significant change which now proposes new development in an area near existing residences that was not contemplated in the original NOP. Not only does this warrant specific environmental review – including a revised Initial Study – but FOWS also believes another public scoping meeting is warranted to clearly inform the community of the current proposal on the table.

2. Need for increased and diverse range of alternatives

The NOP provides no description of what alternatives will be evaluated in the EIR.

> "In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the proposed project that are capable of meeting most of the projects' objectives, and would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No-Project Alternative and will also identify the environmentally superior alternative." (NOP, p. 14)

First, we refer to our comments regarding the purpose of the project, which must include supporting the mountain culture, community quality of life, environment, and other considerations (including the financial future of the community, not just the project applicant). Alternatives cannot simply be based on project-related investment returns. Alternatives which should be examined include:

- No action
- No action with lift upgrades
- Project at various reduced sizes, such as an increase in overnight visitors of no more than 500 (roughly half of the existing full time resident population) and no more than 900 (similar to existing full time resident population).
- Project at various configurations, with and without development on the East Parcel.
- Project with alternative location for maintenance operations, such that location is not near sensitive lands, the creek, nor requires a zoning change from forest to commercial.
- Project alternatives with smaller scale Mountain Adventure Center (i.e. consider 30,000, 50,000, and 70,000 sq. ft.);
- Project with limited increases in commercial (e.g. 50,000 sq. ft., 100,000 sq. ft., 200,000 sq. ft.);
- Project without fractional cabins (no. 16 on Exhibit 4, Concept Plan, 2014 NOP);

impacts may be somewhat altered and/or lessened due to the project changes (e.g., smaller project footprint)." (p. 1, NOP)

- Project with maximum heights comparable to existing maximum heights, or less;
- Project without indoor aquatic center and/or with smaller versions thereof;
- Project with requirements for adequate transit;
- Project with provisions to support small, locally-owned businesses; and
- Conservation Alternative which reduces existing land coverage, improves sensitive stream environmental zones, maintains current height limits and the scenic beauty of the drive from the entrance to the back of Squaw and the mountains.

In addition, the EIR must correctly and carefully analyze the economics associated with the proposed project. For example, to what extent, if at all, are real estate sales needed to pay for lift upgrades? What upgrades are necessary for public safety and/or to meet legal requirements, and what upgrades are more aimed at attracting new customers? What ensures long term operation of lifts and ski resort operations? Will real estate sales provide an ongoing source of funding to help pay for local improvements? How much profit will be ensconced by the applicant and spent elsewhere, versus how much will be used to benefit the local community? What provisions assure long term operation of the ski resort itself?

3. Need to consider important environmental and social changes since 1983 (year of Specific Plan)

As the 1983 Plan notes, projects must consider the social, economic, and environmental conditions of the area. A lot has changed since 1983. Socially, the existing community has clearly stated a desire for maintaining the mountain culture and lifestyle, protecting views, addressing traffic problems, etc., as noted in the 2013 Squaw Valley public survey conducted by Friends of Squaw Valley and Sierra Watch (attached). This survey clearly identifies that the public values the natural environment, casual mountain lifestyle, and outdoor recreation offered at Squaw Valley. Too much development has the potential to negatively impact all of these values.

Unlike thirty years ago - when skiing was about skiing and enjoying the outdoors, large corporate resort companies proposing massive village projects have converged on areas in and around the Lake Tahoe Basin. Thirty years ago, people brought families to ski and children were raised to appreciate the mountain lifestyle. Some of those children even recently won the Olympics! They were not raised with the ski villages of today (see the chronicle of this change documented in the book: "Downhill Slide"[9]). There is great concern among Squaw Valley residents and visitors that too much resort development will ruin the core reasons people love Squaw Valley (e.g. the "soul" of Squaw). Too much development is likely to forever change the dynamics that allowed families to grow up

[9] *Downhill Slide: Why the Corporate Ski Industry Is Bad for Skiing, Ski Towns, and the Environment.* Hal Clifford. Sierra Club books, Oct. 2003.

appreciating Squaw Valley, the mountain culture, our environment, and for children to be raised to become such magnificent athletes.

The new 'mega-resort/village trend" started well after 1983, and available evidence shows that this new trend ruins ski towns, slowly kicking out the locals who care most for the resort, the mountains, and the skiing and boarding. The impacts to the local community, local businesses, and lifestyle/quality of life must be carefully considered in the EIR. Further, if the project aims to build timeshare or fractional ownership units, we note these do not improve communities because such owners are very transient, with little interest in the affairs and civic activities of the broader community.

In addition, the environment has also changed substantially in the last 30 years. Climate change is already drying us out – and will have huge impacts on the ski resort industry. Further, the populations of Squaw Valley and surrounding areas within just a few hours' drive have exploded. This means more people and more cars will come to the area. New populations must also be considered in evaluating the cumulative traffic and environmental impacts of the project. The EIR must carefully and comprehensively evaluate the existing environmental conditions both within and around the Project Area, and the impacts of each project alternative.

II. Environmental Impacts:

The impact analysis must include analysis of both construction and long-term operational impacts including:

1. Impacts to traffic in the Lake Tahoe Basin

As the 1983 Plan notes (p. 6): *"[Squaw Valley] is located within a short distance of nearly a dozen other ski areas and only 6 miles from lake Tahoe. With all of the other attractions so close, it is not reason able to expect all visitors to use commercial and overnight accommodations exclusively within Squaw Valley."* In addition, the IS states: *"Other major roadways in Placer County that would be used by project traffic include I-80 and SR 28."* (p. 2-56).

- The EIR must clearly evaluate the following questions, and analyze the environmental impacts to the Lake Tahoe Basin (including traffic, air and water pollution, noise pollution, safety concerns, emergency access, etc.):
  - ✓ How many visitors will drive to the Lake Tahoe Basin?
  - ✓ How many will drive around the Lake?
  - ✓ How will visitor traffic impact existing conditions in the Basin?
  - ✓ How will increased traffic affect emergency access or evacuations within the Basin?
  - ✓ How many will stay overnight in Tahoe City, or along Tahoe's West Shore?