



Sierra Watch
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July 17, 2015

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

Dear Ms. Krach:

Thank you for the opportunity to comment on the *Village at Squaw Valley Specific Plan Draft Environmental Impact Report (DEIR)*.

As is made clear in the attached letter, the DEIR fails to satisfy the basic requirements of state planning and environmental laws, and the proposed development is starkly inconsistent with both the spirit and letter of existing Placer County policy.

The inadequacies of the DEIR are rooted in the scale of the development proposal. The proposed *Squaw Valley Village Specific Plan* (the Project) would remake the region with a series of highrise condominium projects and an indoor amusement park. All told, new approvals would entitle 25 years worth of development. It may be impossible to truly assess the full range of impacts that development of its size and scope would have in the context of such a treasured place as Squaw Valley and the Tahoe Sierra. CEQA, however, demands nothing less.

In order to ensure that planning in Squaw Valley does provide a responsible vision for the region *and* satisfies the requirements of state law, Sierra Watch urges Placer County to deny the Project outright and ask proponents to submit an entirely new application for entitlements.

We are confident that, working together, local residents, Tahoe lovers, Placer County, and the landowner could come up with a better blueprint for reasonable development that would prove worthy of Squaw Valley – one of the great, iconic places of our shared Sierra.

Our comment letter was prepared by the law firm of Shute, Mihaly & Weinberger. Their conclusions are the result of detailed research by a team of experts in law, planning, hydrology, wildlife biology, transportation, and related fields.

The team carefully reviewed the proposed plan, relevant biological data, hydrological models, recent transportation studies, the Water Supply Assessment for the Project, and related case law – as well as the DEIR itself.

Once again, their findings are clear: the DEIR fails in numerous respects to comply with fundamental requirements of the *California Environmental Quality Act* (CEQA).

Transportation is an especially important issue in the region; no one likes to spend their time in Tahoe stuck in traffic. The DEIR, however, fails to adequately assess the Project's impact on local and regional roadways.

- The DEIR fails to adequately analyze the Project's impact on summer traffic, containing no analysis of summer daily traffic – despite the DEIR's assertion that the Project is expected to generate three times more peak-day traffic in the summer (8,410 new daily trips) than in the winter (2,821 new daily trips).
- The DEIR also substantially underestimates the volume of winter peak-hour traffic, relying on faulty methodology to identify the amount of traffic the Project would be expected to generate.
- The DEIR's limited traffic analysis is further flawed because the document grossly underestimates the number of car trips the Project would generate. For example, even though the DEIR estimates that 1,200 guests would likely visit the proposed amusement park every day, the document asserts that this attraction would generate only 58 car trips per day.
- The DEIR underestimates the Project's traffic impacts because it dismisses impacts on Interstate 80 even though, if approved, the Project would routinely add more than 4,000 new daily car trips to I-80 and its ramps.
- The DEIR largely ignores the Project's effects on emergency access even though, if approved, the Project would choke numerous highways in the area with Level of Service 'F' – gridlock.

The DEIR fails to adequately assess the Project's impacts on some of the key values that make up the unique and treasured sense of place in Squaw and Tahoe.

- The DEIR fails to adequately analyze or mitigate the Project's effects on Squaw Valley's iconic scenery; its simulations downplay the severity and extent of the Project's ten-story tall highrises.
- The DEIR fails to meaningfully assess or mitigate the Project's noise impacts, even though peace and quiet are fundamental selling points for the Tahoe experience.
- The DEIR's analysis of light and glare is legally deficient. The ability to enjoy the starry sky of the Sierra Nevada is an important and measurable value. Light pollution from Squaw already impacts the Tahoe Basin, but the DEIR fails to mitigate for increased glare.
- The DEIR fails to adequately analyze the Project's air quality impacts, notably from dust and particulate matter during the 25 years of demolition and construction.
- The DEIR does not adequately analyze impacts to cultural and historic resources, failing to identify, for example, that the Project site includes California Historical Landmark No. 724 (Pioneer Ski Area of America, Squaw Valley).

Squaw Valley is not an island, and the Project would have tremendous impacts throughout the Tahoe Sierra. But the DEIR also fails to assess its role in the region and relationship to other projects.

- The DEIR fails to adequately describe the regional setting and Squaw Valley's role in the broader Tahoe Sierra; it therefore downplays impacts on noise, traffic, and light pollution on the Tahoe Basin.
- The DEIR improperly segments linked projects. For example, it ignores the Project's potential relationship to the proponent's proposed Gondola connection to Alpine Meadows and the local water district's proposal to import water from Martis Valley (Project 60) and their associated impacts.

The current drought underscores the limits of Squaw Valley's watershed and existing concerns about water security. But the DEIR both overestimates existing supplies and underestimates likely demand.

- The DEIR's analysis of the Project's impacts on water supply resources is inadequate. Relying on a deeply flawed groundwater model, the DEIR grossly overestimates the amount of groundwater that is available to the Project.
 - The DEIR misleads the public with false annual precipitation data. The DEIR estimates average precipitation at 263 inches per year in snow-melt equivalent in Squaw Valley; the actual amount is only 80.6 inches per year – less than a third of what the DEIR claims.
 - The DEIR makes almost no mention of the current drought – or future droughts; instead it relies, incredibly, on precipitation data through only 2011. And it dismisses impacts of future drought by claiming, despite overwhelming contradictory scientific evidence, that drought events “are expected to be limited.”
 - The DEIR fails to reveal the extent that the groundwater in the Basin is connected to Squaw Creek or that it flows in a subterranean stream. The use of surface waters and subterranean streams require water rights within the purview of the State Water Resources Control Board. Should the state assert their jurisdiction over the water in Squaw Valley, the applicant would need to “get in line” for a water rights permit; the project would not be guaranteed access to the water it would need.
- The DEIR's analysis of the Project's impacts on water supply resources is also inadequate because it applies artificially low occupancy rates to grossly underestimate the Project's demand on limited water supplies.
 - The DEIR employs an improper occupancy rate for its analysis. Proponents claim the development would create a year-round, world-class destination resort, but the DEIR assumes a low 55% occupancy rate. This rate is based on recent occupancy figures, a period marked by drought, poor snow conditions, and an historic economic recession.

Squaw Valley provides important habitat to a wide range of animal and plant species. But the DEIR fails to assess the Project's impact on biological resources.

- The DEIR fails to adequately analyze and mitigate the project's impact on riparian areas and in-stream water flows. For example, it fails to analyze the impacts on any sensitive habitat more than just 12 inches from Squaw Creek. And it ignores or downplays the fact that increased groundwater pumping would draw down water levels in Squaw Creek.
- The DEIR's flawed hydrological assessment minimizes the impacts to plants, fish, and wildlife that depend on a high water table to feed pools, meadows, and shallow root systems during the dry summer months.
- The DEIR's analysis of impacts on the endangered Sierra Nevada Yellow-legged Frog and its habitat is inadequate. The Project is within proposed critical habitat of the Sierra Nevada Yellow-legged Frog, which is listed as endangered under the federal Endangered Species Act. The DEIR recognizes this fact and discloses that the Project's construction may kill or injure individual frogs and result in the loss of its habitat. But its analysis is deficient because it fails to quantify the amount of habitat that may be lost; nor does it provide mitigation for the loss of frog habitat.
- The DEIR improperly defers mitigation of impacts on biological resources. For example, the mitigation measure to protect yellow warbler and olive-sided flycatcher habitat, if a nest were found before construction, requires only "modifications to the project design to avoid removal of occupied habitat while still achieving project objectives shall be evaluated, and implemented to the extent feasible."
- The DEIR improperly relies on mitigation measures that are vague or unenforceable. For example, to protect the Sierra Nevada mountain beaver and snowshoe hare, mitigation measures provide only that "buffers *may* be established" (emphasis added).

Climate change is an issue of global importance and, also, state law. Ironically, the DEIR fails to adequately evaluate the Project's significant contribution to climate change – the biggest threat to the ski industry itself.

- The DEIR downplays the Project's potential impact on climate change. Emission estimates are dramatically reduced by underestimating auto emissions from Project-generated vehicle trips and completely ignoring increased air travel.

- The DEIR inexplicably downplays the Project's generation of greenhouse gases, measured in metric tons of CO₂ per year, as insignificant. The Placer County Air Pollution Control District coordinates with the Sacramento Metropolitan Air Quality Management District, which sets a clear operational threshold of significance: 1,100 metric tons of CO₂ per year. According to the DEIR, the Project would generate (a grossly underestimated) 45,403 metric tons of CO₂ per year. But that amount is somehow dismissed as insignificant.
- The DEIR acknowledges that Squaw Valley is not slated for development by the Sacramento Area Council of Governments' plan to comply with state climate law, notably SB 375. Yet it somehow concludes that the urbanization of Squaw Valley is consistent with state laws concerning climate change.

The DEIR fails to assess risks to public safety:

- The DEIR fails to properly analyze the Project's role in exacerbating the risk and impacts of catastrophic wildfire, avoiding adequate discussion of the challenges of evacuating an area with only one egress that would, if the project were approved, suffer gridlock under normal circumstances. It simply kicks the can of emergency evacuation further down the road, claiming that "the Placer County Department of Public Works would be involved in implementing measures to ensure acceptable traffic flow and reduce the risk of impairment to emergency evacuation routes."
- The DEIR avoids assessing the risks associated with propane storage, even though the entire project would rely on propane, and the Project would include storage of 150,000 gallons of propane in the Village.

The DEIR fails to meet additional basic requirements of state-mandated environmental assessment.

- The DEIR provides an incomplete description of the project and the project setting. For example, the document does not disclose the location of major components of the proposed development, including employee housing, a new fire station, wastewater holding tanks, and water-pumping wells.
- The DEIR incorrectly dismisses the Project's growth-inducing impacts, claiming "it would be developed in locations where there is already access to urban services."
- The DEIR fails to assess the range of alternatives required by CEQA; instead it offers only infeasible 'straw-men' versions of the existing plan.

Any one of these arguments would render the DEIR inadequate under CEQA. Combined, they build an overwhelming argument against approval of the proposed development.

Additionally, as the attached letter spells out in great detail, the Project also demonstrates a disturbing disregard for existing Placer County policies, as established by the Placer County General Plan and the Squaw Valley General Plan and Land Use Ordinance (“SVGPLUO”).

Incredibly, the DEIR finds that the Project is consistent “overall” with the General Plan, even though the Project clearly contradicts both the vision and specific language of existing County policy. For example:

- General Plan Policy 3.A.7 establishes standards to ensure traffic flow. The Project would not meet those standards and slow traffic to Level of Service F – gridlock.
- General Plan Policy 1.G.1 calls for expansion of existing ski areas where circulation and transportation system capacity can accommodate such expansions. The Project is proposed for an area that lacks the transportation infrastructure to handle thousands of new daily car trips.
- General Plan Policy Policy 6.C.6 calls for preservation of the habitats of threatened, endangered, and/or other special status species protection of significant ecological resource areas and other unique wildlife habitats. The Project, however, proposes intensive, urban development in areas identified as proposed Critical Habitat for the endangered Sierra Nevada Yellow-legged Frog.
- General Plan Policy 1.K.1. requires that new development in scenic places maintains the character and visual quality of the area. The Project and its highrises, however, would cause "significant and unavoidable" negative impacts to Squaw's legendary scenery.
- General Plan Policy 8.C.1. is designed to ensure that development in high-fire-hazard areas minimizes the risk from fire hazards and meets all applicable state and county fire standards. The Project, however, would add substantial population to areas of very high fire hazard severity, with no secondary exit and with roadways stalled at Level of Service F.

In putting forth a vision for the future of Squaw Valley, Placer County's Squaw Valley General Plan and Land Use Ordinance contains guidelines and planning principles to conserve, protect, and enhance the aesthetic, ecological, and environmental assets of Squaw Valley. The Project, however, presents a clear threat to these values, as spelled out in the "significant and unavoidable impacts" throughout the DEIR.. For example:

- Placer County's Squaw Valley General Plan and Land Use Ordinance is designed to allow "development which will not aggravate present or future traffic projects" and, even, *reduce* traffic by 50%. The Project, however, would add thousands of new daily car trips to the region's roadways, reducing traffic flow to gridlock.
- Placer County's Squaw Valley General Plan and Land Use Ordinance requires no further encroachments of buildings, impervious surfaces, or other development activity in lands designated as "Conservation Preserve". The Project, however, proposes to re-designate and develop lands that are currently protected as Conservation Preserve.

Approval of the Project would therefore violate not only CEQA but, also, the California Planning and Zoning Law and the Subdivision Map Act.

All told, the DEIR fails to fully convey the magnitude of this massive project and the extent to which it would threaten the irreplaceable values of Squaw and Tahoe – fresh air, starry skies, the natural world, mountain streams, scenic vistas, outdoor recreation – and replace them with highrise condos, traffic gridlock, and noise.

It therefore fails to meet the most basic goal of CEQA: to inform the public and decision-makers. Further assessment would require extensive revision of the document and recirculation for public comment.

Sierra Watch believes that best way to ensure legality of future land use approvals and, more importantly, a sound vision for the future of Squaw Valley, is to deny the project outright.

Again, thank you for the opportunity to participate in the public planning process.

Sincerely,



Tom Mooers
Executive Director

cc:

Senator Diane Feinstein, United States Senate
Senator Barbara Boxer, United States Senate
Representative Tom McClintock, United States House of Representatives
John Laird, Secretary, California Department of Natural Resources
Joanne Marchetta, Executive Director, Tahoe Regional Planning Agency
Joanne Roubique, District Ranger, Tahoe National Forest
Ed Wilson, Director of Public Affairs, California Department of Water Resources
Charlton H. Bonham, Director, California Fish and Wildlife Service
Julianne Polanco, Preservation Officer, California Office of Historic Preservation
Kevin Yount, Regional Planning Liaison and Intergovernmental Review, CalTrans
Erik Johnson, Manager of Policy and Administration, Sacramento Area Council of Governments
Laurie Kemper, Ombudsman, Lahontan Regional Water Quality Control Board
Tony Lashbrook, Town Manager, Town of Truckee
Brian Foss, Planning Director, Nevada County
Tom Christofk, Control Officer, Placer County Air Pollution Control District
Gretchen Bennit, Control Officer, Northern Sierra Air Quality Management District
Sandy Evans Hall, Executive Director, North Lake Tahoe Resort Association
John McEldowney, Program Manager, Placer County Office of Emergency Services
Michael Holley, General Manager, Tahoe Donner Public Utility District
John Johnson, President, Squaw Valley Mutual Water Company
Mike Geary, General Manager, Squaw Valley Public Service District
Sage Sweetwood, Executive Director, Planning and Conservation League
President, Truckee Chapter, Trout Unlimited
Daniel Gluesenkamp, Executive Director, California Native Plant Society
Friends of Squaw Valley Steering Committee, Friends of Squaw Valley
Lisa Wallace, Executive Director, Truckee River Watershed Council
Susan Gearhart, President, Friends of the West Shore
Brian Turner, Senior Field Officer/Attorney, National Trust for Historic Preservation
Peter Van Zant, Executive Director, Sierra Nevada Alliance
Steven Frisch, President, Sierra Business Council
Sally Brew, Squaw Valley Property Owners Association
Jenny Loda, Amphibian and Reptile Staff Attorney, Center for Biological Diversity
Daniel Heagerty, President, Granite Chief Wilderness Protection League
Ozzy Simpson, Steering Committee Member, Friends of Alpine Meadows
Darcie Goodman Collins, Executive Director, League to Save Lake Tahoe
Ed Heneveld, President, Friends of Squaw Creek
Cindy Ochoa, Chapter Chair, Tahoe Area Chapter of the Sierra Club
Barbara Williams, Chapter Chair, Motherlode Chapter of the Sierra Club
Alexis Ollar, Executive Director, Mountain Area Preservation
Bryan Elliot, Senior Vice President, KSL Capital Partners
Andy Wirth, President, Squaw Valley Ski Holdings
Chevis Hosea, Vice President of Development, Squaw Valley Real Estate