

Forum on Writing  
a Response to  
the Draft EIR

**Unavoidable Impacts  
in Squaw Valley  
are Unacceptable**

# AGENDA

- 1) Summary of the impacts from dEIR
- 2) How to write a letter and what to include
- 3) Details of specific topics
  - a. Traffic
  - b. Population
  - c. Parking
  - d. Views
  - e. Noise
  - f. Lot 19 & Lots 16, 17 & 18
  - g. Shadowing
  - h. Cultural Resources
  - i. Air Quality
  - j. Water
- 4) Discussion of Alternative(s)
- 5) Position of Friends of Squaw Valley

We should all be aware that there is a Placer County Policy that pertains to this proposed project

Policy 1.G.1. “The county will support the expansion of existing winter ski and snow play areas and development of new areas where circulation and transportation system capacity can accommodate such expansions or new uses and where environmental impacts can be adequately mitigated.”

**All of us need to be referencing this Policy to drive home the point that the Planning Commission and the Board of Supervisors cannot change their own Policies just to reward a private equity company a big payday, with Squaw Valley paying the price**

# Significant and Unavoidable Impacts as presented by County

- Cultural Resources (significant and unavoidable)
  - Removal of two historic 1960's Olympics era buildings
  - Eligible for listing in the NRHP and the CRHP
- Visual Resources (significant and unavoidable)
  - Construction / operation result in adverse impacts to scenic resources.
  - Increased night lighting / effects of light and glare
- Transportation and Circulation (significant and unavoidable)
  - Adverse impacts to intersection of Squaw Valley Road & Village East Road
  - Potentially adverse impacts to Caltrans intersections

# Significant and Unavoidable Impacts as presented by County

- Noise (significant and unavoidable) –
  - Construction and operation of the project result in adverse impacts to noise
  - Placer 60db noise limit moves 70 ft further out
- Greenhouse Gases and Climate Change (significant and unavoidable post 2020) –
  - Cannot predict if the operational emissions would comply with GHG regulations post 2020

Impacts in these areas are also considered potentially cumulatively significant

# Other Impacts as presented by County

- Land Use and Forest Resources – Impacts would be less than significant
  - Impacts to other environmental resource areas are less than significant, or would be reduced to a less than significant level through mitigation measures proposed
- Population, Employment, and Housing – Impacts would be less than significant with mitigation
  - Provide housing for half of new FTE employees
- Biological Resources - Impacts would be reduced to less than significant with mitigation
  - Adaptive management for Squaw Creek Restoration

# Other Impacts as presented by County

- Air Quality - Impacts would be reduced to less than significant with mitigation:
  - Implement ongoing ROG and NOx emissions review and reduction
- Soils, Geology, and Seismicity - Impacts would be reduced to less than significant with mitigation:
  - Fault evaluation report
  - Continued avalanche control / compliance with building code
- Hydrology and Water Quality- Impacts would be reduced to less than significant with mitigation:
  - Water quality protection for well construction
  - Ongoing monitoring and verification of groundwater pumping
  - Adaptive management for Squaw Creek Restoration

# Other Impacts as presented by County

- Public Services and Utilities – Impacts would be less than significant with mitigation:
  - Pumping management plan, water supply verification
  - Onsite storage
  - Development Agreement with PSD for fire and other services
- Hazardous Materials and Hazards - Impacts would be reduced to less than significant with mitigation:
  - Hazardous materials contingency plan for demolition
  - Construction management plan to address emergency response

**You do not have to agree with the dEIR – there may be errors, miscalculations, bad logic, missing elements**



# How to write a comment letter

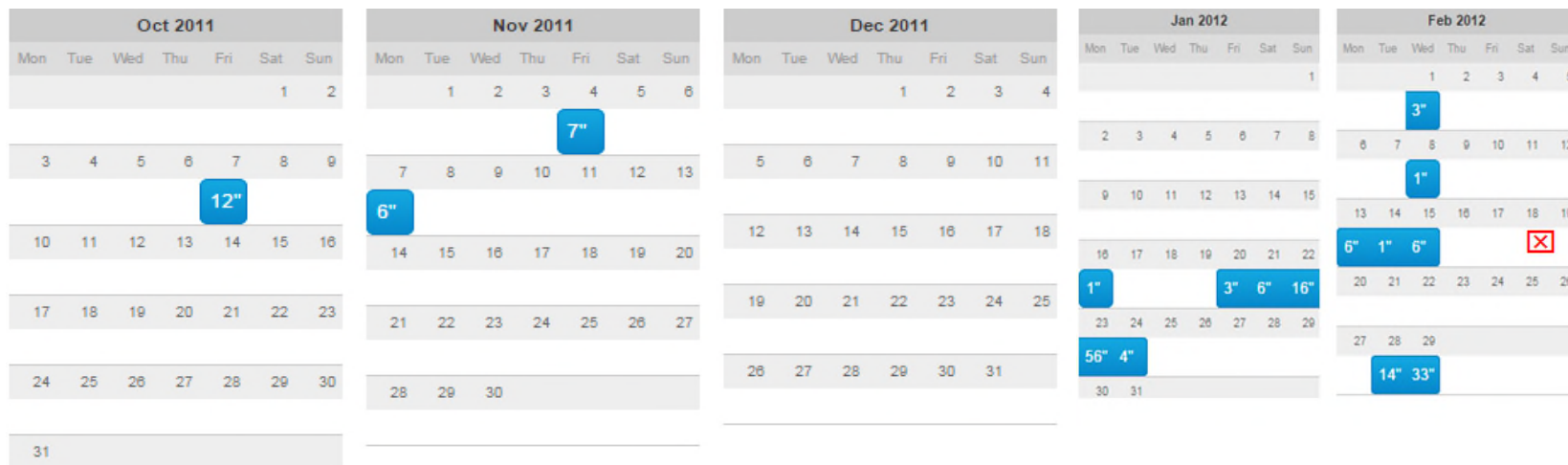
1. Introduce Yourself - note any special expertise you may have, how long you have owned property or lived here
2. Choose one or just a few issues - stick to those you are most concerned about, do some homework
3. Answer the question: Is the dEIR accurate in how it evaluates your chosen subjects? You do not have to agree with the dEIR
  - a. Is there some aspect of the analysis or conclusion that is **in error**
  - b. Is there some impact area that is **missing**
  - c. Will the mitigations proposed work as presented? if not, why not? Any suggestions to improve?
4. Be polite, concise, and specific
5. State the action you want the Planning Commission to take  
(more later)
6. Thank Placer County for addressing your concerns

# The Issue of Reductions Already Done

- The 1983 SVGPLUO has allowance for a much denser development
  - The applicant continues to hold this fact up as evidence that they are “listening to the community” and we should credit them for the two reductions so far.
  - Both configurations were evaluated as part of Alternatives; the result for NOP density was “results in greater impacts than the proposed project”, And for the GP density “may not be enough water, won’t be supported by market...”; both were REJECTED
- => There should be no credit given for reductions from a size that would have had even worse EIR impacts

# Traffic

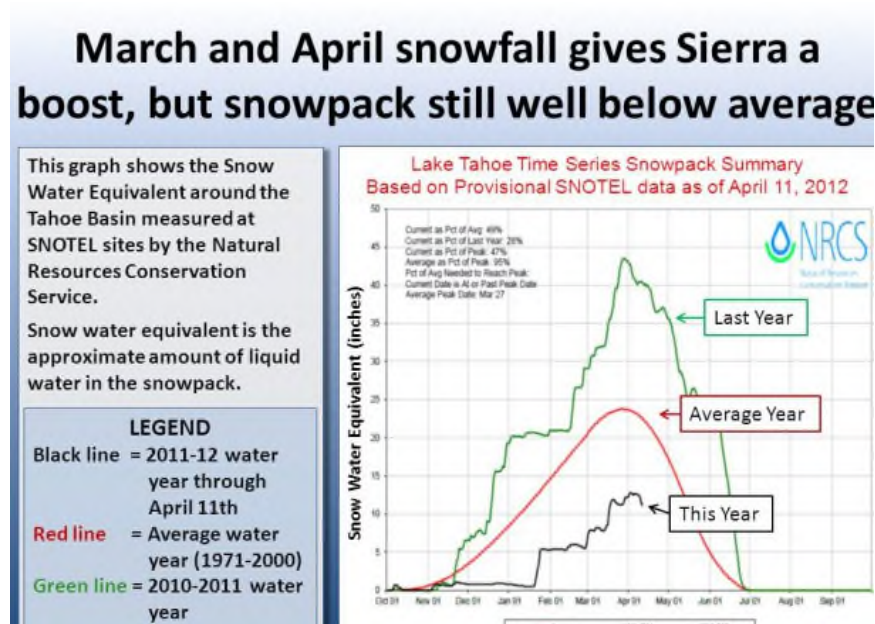
- Objective was to determine peak hour and day for winter conditions; traffic volume should represent peak AVERAGE winter ski conditions
- Analysis year was 2011-12 winter



- There was no snow from Nov 8<sup>th</sup> thru Jan 16<sup>th</sup>; Thanksgiving, Christmas, MLK were all busts; there was ONE big storm Jan 23<sup>rd</sup>
- Feb 18<sup>th</sup> 2012 was the analysis day (5<sup>th</sup> busiest day); 1<sup>st</sup> day of Presidents' weekend

# Traffic

- The objective was not even remotely met; on an average year the 5<sup>th</sup> busiest day would probably be one of the days of Christmas week, along with days 1 thru 10; Just look at this chart



- The traffic analysis should be totally redone, requiring a traffic simulation for an average winter ski season
- With analysis this faulty, all the impacts are significantly understated and, in reality, are much worse than reported

# Traffic

A professional who works for the City and County of San Francisco as a traffic engineer and streetscape designer, and also as a CEQA transportation practitioner for large development projects has contributed the following

The DEIR declares the traffic impacts to be significant and unavoidable, when in fact these impacts can be mitigated. Such measures must be explored:

- Designating eastbound bus stops along Squaw Valley Road (currently there are only westbound stops, making the shuttle unviable for residents);
- Real commitments to support, publicize, and subsidize regional transit for visitors and employees, such as free regional bus or train tickets packaged with lift tickets and hotel stays;
- Effective carpool incentives such as preferential and free carpool parking for visitors and employees, carpool casual carpool pickup spots in Truckee and Tahoe City, free overnight ski lockers, and publicity that encourages carpooling;
- Charging for parking for day skiers to encourage carpooling and transit. To ensure that day skiers bear no additional cost associated with the paid parking, daily lift tickets and season passes should be reduced in price correspondingly; and
- Reducing the speed limit on Squaw Valley Road from 35 down to 25 mph, which would mitigate traffic noise and improve safety;

# Population

- The SVGP allows for a seasonal-peak, overnight residential population of about 11-12,000 people.
- The Plan states the permanent population, and the number of housing units must not exceed the ability of the environment and public facility infrastructure to accommodate the peak population.
- Placer County has estimated the current peak overnight population at 5,858 people using WSA data, which is an assumption on the average yearly population, not the peak seasonal overnight population; The WSA admitted the peak was unknown
- No attempt was made by the County to determine the actual peak

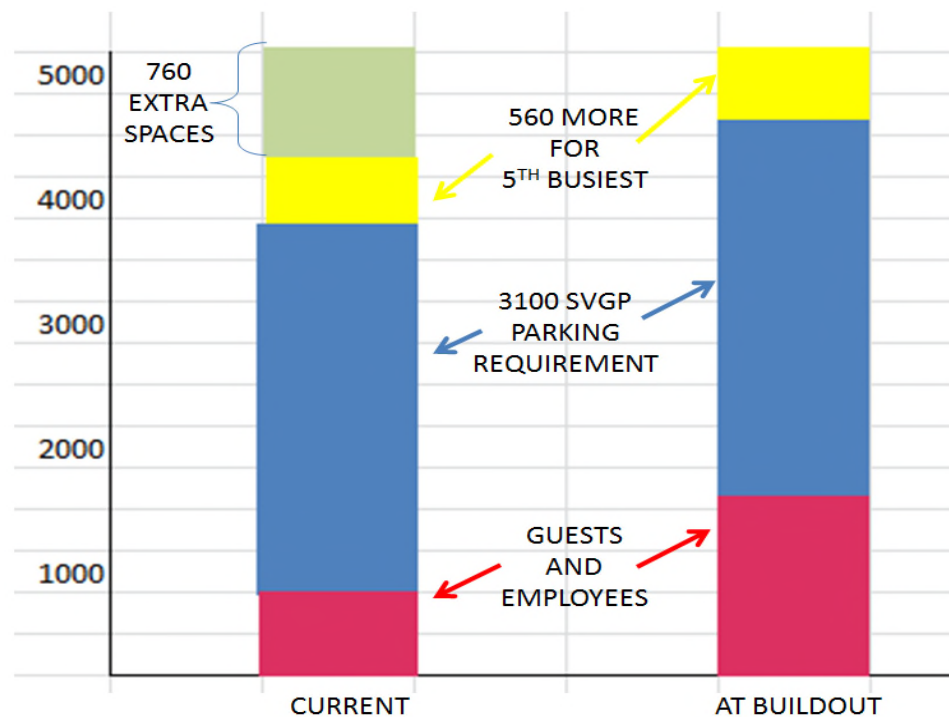
# Population

- An analysis with reasonable assumptions shows that the current potential peak overnight population is almost 12,000, and with the projects that have not yet been built, that population could go over 17,000
- This analysis includes all units and bedrooms we have, then adding in the developments that are approved or on the active list, but maybe not built yet; conservative assumptions on bedrooms and occupants were made
- And the list of additional units could be even larger (eg Poulson property)

	Existing, Active or Approved	Total Units	Bedrooms Per Unit
Resort at Squaw Creek Phase 2	Approved	270	2 to 4
Plumpjack Addition and Remodel	Active	94	1 to 5
Village at Squaw Valley Specific Plan	Active	750	2
Squaw Valley Ranch Estates	Active	8	4
Palisades at Squaw	Active	63	3,4 and 5

# Parking

- 1983 SVGP specified a requirement for 3100 day skier parking spaces



- At present, capacity is ~5,000 cars includes 3100 + 560 (5<sup>th</sup> busiest day) with 760 extra – all used on busy & powder days
- At buildout, capacity is ~5,100 but NO extra spaces



# Parking

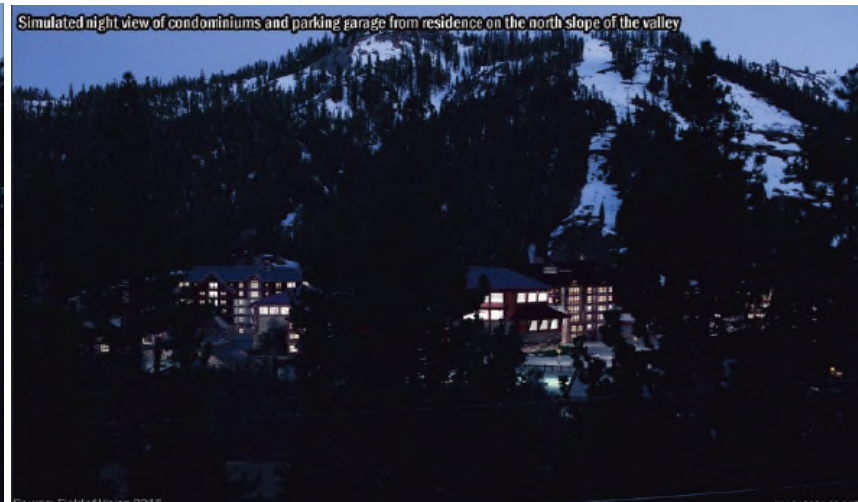
- dEIR says this situation is acceptable since there is 22% turnover of parking spaces on busiest day, throughout the day; empirical evidence says this is NOT true
  - The fallback of valet parking, parking management ,etc is also not credible
  - dEIR says “there will be no increase in skiers on the mountain”; if this is the case, there will have to be FEWER day skiers
- => The day skier, who has been the backbone of Squaw Valley business, will be disenfranchised by the proposed project

# Views

- dEIR makes some ludicrous arguments
  - While the visual impact of construction will be significant on all visitor groups, the visual impact from ongoing operation will significantly impact only the long term residents
  - “The natural terrain dominates the view, and as a consequence, the structures in the near foreground are not visually prominent”
  - All you need to do to hide the view obstruction is build screens during construction and implement the architectural and landscape design guidelines which allowed the tall, dense buildings in the first place.
  - significant impactful source of nighttime lighting is mitigated by landscaping and implement the architectural and landscape design guidelines which allowed the tall, dense buildings in the first place
- Consider the first argument – what about the 20-30,000 pass holders? Do they not count either? What about “

# Views

- What about nighttime lighting –



if this is not significant, not sure what is (and this is only Christy Lane); it gets worse as you go higher

With regard to skyglow, there are no mitigation measures available that would reduce the effects. Therefore, this impact would remain significant and unavoidable

# Noise

- The Placer County general plan says

Policy 9.A.9: Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table 11-7 (60db) at outdoor activity areas or interior spaces of existing noise-sensitive land uses.

- Placer County Noise Ordinance (Article 9.36.060 ) allows exceptions “some noise-generating activities are exempt from the above noise ordinance standards, including construction that is performed between 6:00 a.m. and 8:00 p.m., Monday through Friday, and between 8:00 a.m. and 8:00 p.m. Saturday and Sunday”

=> Impact of Construction Noise will be significant

=> Impact of Operational Noise is potentially significant

# Noise

- Project generated transportation noise will be significant,
  - dEIR says that summer and winter peaks only occur < 15 times
  - Summer peak would now cause noise levels to exceed the Placer County exterior noise standard
  - Winter peak already exceeds peak, and will increase some more (dEIR says not perceptible)
  - Region of significant noise increases from 100 ft from road to 170 ft from road
- ⇒ THERE IS NO MITIGATION
- ❑ BUT we know the traffic study is significantly flawed, and noise thresholds will be exceeded much more often than reported
- ❑ dEIR allows that a little bit more noise won't hurt along Squaw Valley Rd
- ❑ Impact of noise within homes is significant and unavoidable, but okay (by dEIR) since all homes are heavily insulated with dual pane windows

# Water

## Biological resources + Hydrology and Water Quality

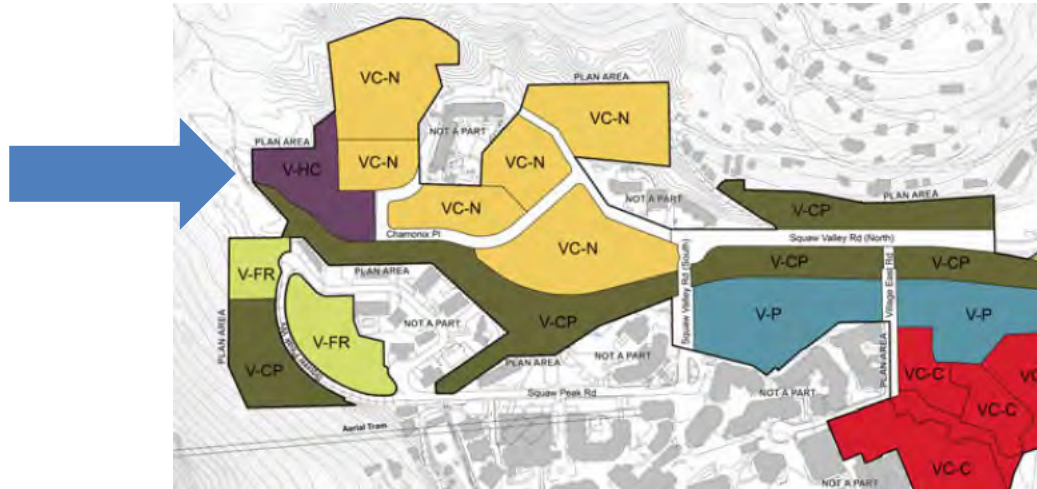
- Current groundwater pumping 834 acre feet annually; project requires additional 234 AFY (+28%)
  - impact = “duration and spatial extent of seasonal drying would increase”
  - 6 new wells = “more straws, same bathtub”
  - GW elevations “could drop 3 to 4 feet”
- Water Supply Assessment – *not verification*
  - last 3 years of drought will be added to GS model
  - Implies adequate water to supply future project and non-project demands
- Sufficiency of operational supply - *not actual streamflow conditions or biological consequences* of additional pumping
- What is safe – sustainable - substantial?
- MM13.4+5 “the implementation of...operating parameters provided in the WSA would confirm...{no} “substantial” adverse effects on water quality, Squaw Creek and/or biological habitat” (this is unwarranted confidence; need monitoring to confirm and water management action plan to respond)

# Water

- Squaw Creek is impaired due to excessive sedimentation and inadequate instream flows (TMDL)
  - Last spawning brown trout 1995 (CG)
- GANDA 2012+2014 fish and aquatic resource study
  - ✓ groundwater model: severe limitations and uncertainty - nevertheless
    - Predicts worse water quality and quantity
    - Only “simulates” streambed flows (3-4% only cfs decrease) and one foot up riparian bank
    - What is “substantial”?
  - ✓ additional pumping will cause up to 3 foot drawdown of aquifer, below streambed in eastern project
    - cause harm to fish refugia pools (smaller, fewer, further between)
    - cause harm to riparian vegetation & bank stability = more sediment
    - LTS = monitor plants and irrigate = pump more

# Lot 19

- Zoned as CP & FR, it is to be rezoned Heavy Commercial to allow a 12,000 sq ft (2 floor) maintenance facility



⇒ This MUST not be allowed (ref Section 15.1 dEIR)

- Heavy Maintenance activities and storage of chemicals and toxic materials; danger of contaminating Squaw Creek & aquifer
- Storage of 200,000 gallons of propane will also be placed in this area with daily deliveries of 30,000 gallons or more
- Traffic from maintenance trucks, propane and other vehicles thru VC-N is not analyzed in the dEIR. Neither are emergency services.



# Lots 16/17 and 18

- Zoned mostly Village Commercial, these lots are to have fractional occupancy cabins



- Construction here is on 25% slope with tree cutting and extensive grading required
- This is prime aquifer recharge area; putting our water supply at risk. As stated by the Squaw Valley Public Service District Consultant – Hydrometrics WRI – at a SVPD Board Meeting
- KSL is proposing to trade 1.89 acres of Heavy Commercial (adjacent to Far East Lift) for 4.46 acres of Conservation Preserve and Forest Recreation in lot's 16/17/18/19 (zoning map available)

# Shadowing

- The dEIR shadowing impact focuses only on shadowing existing structures: “(8.4) “Create additional shadowing on existing structures or outdoor public gathering areas during a substantial portion of the day”. And, the impact is minimal



Spring 3-20 @ noon



Summer 6-20 @ noon



Fall 9-20 @ noon



Winter 12-20 @ noon

- But the dEIR also says “ The proposed structures would also cast shadows on ..... outdoor use areas including the open area associated with Squaw Creek, and other proposed buildings. In accordance with the significance criteria above, internal effects of the project are not considered in the analysis.”

# Shadowing

## BUT WHY NOT!!

- Lot 33 is a key “gathering space” in the proposed project with part of this gathering space in shadows the entire year, with mid-summer being the only decent time
- All winter long this key “gathering area” would be in shadows and unceasingly cold; Authors of dEIR recognized this, and in reduced density alternative the “gathering area” is open to the south



- The positioning and orientation of 1A and 1B need to be redone.

# Cultural Resources

- State Historical Designated Site No 724 “Pioneer Ski Area”
- Olympic Valley Lodge (formerly Athlete’s Center) and Far East Center (formerly Nevada Spectator’s Center) are to be demolished, but documented for “preservation”
- Multiple Statues/Policies about such actions
  - CEQA 5024.1. (b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment
  - “Substantial adverse change includes demolition destruction relocation or alteration such that the significance of an historical resource would be impaired (PRC Section 5020.1(q))
- Chapter 17 Alternatives for reduced density include several options for preservation of these buildings along with less impacts.

# Air Quality

- Impact 10-2: Long-term operational emissions of ROG and NOX could conflict with the air quality planning efforts and contribute substantially to the nonattainment status of Placer County with respect to the NAAQS and CAAQS for ozone. This would be a significant impact
  - Mitigation relies on the project applicant funding and implementation of all identified reduction measures, the project applicant preparing supporting analysis, etc
- ⇒ Who is the watch-dog, and who is going to be held responsible?
- A scaled back design, similar to Chapter 17 alternative, reduces this long term impact and does not rely on watch-dogs

# dEIR Alternatives

- The dEIR states “one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project “; note: not ALL objectives
- Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant adverse impacts of the project
- Rejected possibilities
  - 2012 NOP (2X the size) = greater impacts than the project ; REJECTED
  - SVGPLUO density = even greater impacts than the NOP; REJECTED
  - Reduced Building Heights; REJECTED (but density kept the same)
- Analyzed possibilities
  - No Development ; not meet any project objectives, inconsistent with GP
  - No Project; SVGPLUO development; mirrors the previous 25 years; ~50%
  - Reduced Density; **environmentally superior alternative**; TRAFFIC IMPACT reduced to “no significant impact” and other impacts reduced as well

# dEIR Alternatives

- Reduced Density Alternative

- significant impacts to housing, biological resources, cultural resources, visual resources, traffic, air quality (operations), noise, and greenhouse gases would be reduced or avoided, would not meet several project objectives
- Retains tall buildings; adds parking in VC-N area



- Friends of Squaw Valley Reduced Height & Density Alternative

- No buildings in VC-C taller than 72' (FofSV survey of June 2014) – minimize visual obstruction, night lighting
- Density is ~50% of project; retains other advantages of Reduced Density Alternative
- Variations allow for moving maintenance, fewer buildings, larger plaza, no podium parking



# Position of Friends of Squaw Valley

We contend that the proposed Village at Squaw Valley, as analyzed in the dEIR, results in **too many significant and unavoidable impacts** which outweigh the benefits that such a project would provide. This should preclude a Finding of Overriding Consideration by the BoS.

Even the drafters of the dEIR agree that the impacts are too large for its size. The Alternative section (17.25) states, "The 50 percent (density) reduction was based on a rough conceptual estimate of the minimum amount of development reduction required to reduce traffic volumes sufficiently to have no significant traffic impacts." This 50% reduction also reduces impacts on noise, visual, water, pollution, etc.

We therefore ask the Placer County Planning Commission and the Board of Supervisors to **reject the proposed project** because of its significant and unavoidable impacts, and **require the applicant to submit an alternative with 50% or fewer bedrooms, lower heights (max 70'), and revised project features.**





Discussion  
Question and Answer Session