

**THE FRIENDS OF SQUAW VALLEY POSITION
ON THE PROPOSED VILLAGE AT SQUAW VALLEY PROJECT
12-24-15**

SUMMARY

The Friends of Squaw Valley (FoSV) contends that the current Squaw Valley Real Estate's (SVRE) Village at Squaw Valley development proposal of 1500 bedrooms causes too many significant and unavoidable impacts as detailed in the Draft Environmental Impact Report (dEIR). **The project, as proposed, must NOT be approved** by Placer County. Furthermore, not only must the dEIR be revised to correct underestimations of environmental harm, but the project must also be downsized. A revised project must be submitted at a size that reduces the impacts to an acceptable level in keeping with the benefits to the local and regional area. This position paper provides the basis for this contention, as well as compelling considerations on other elements in the County decision process.

Project must be scaled back: The buildable acreage remaining in Squaw Valley is extremely small (unlike many other ski area villages) and the environment is very sensitive to overdevelopment. It is therefore not surprising that the dEIR detailed twenty-three areas of significant and unavoidable impacts resulting from the SVRE's proposal. These areas included traffic, noise, scenic views, water, and pollution. The only way to diminish these impacts is by reducing the number of bedrooms (aka population).

The dEIR proposes an alternative (17.3.4) with a reduction to 50% of the bedrooms in order "to avoid or substantially reduce" the significant environmental impacts. Further reductions might be necessary depending on a more thorough re-analysis of traffic and water. The dEIR must be revised to determine the proper project size, balancing benefits and impacts.

Overriding Considerations not justified: The Board of Supervisors may only approve a project with significant and unavoidable impacts by making a finding of "overriding considerations" wherein benefits are determined to outweigh the severity of the environmental harm. FoSV contends that the benefits of the proposed project to Squaw Valley, the greater Truckee-North Tahoe region, and Placer County do not outweigh the environmental damage and, therefore, would not justify such a Finding.

Conditions of Approval required: While FoSV rejects this particular project proposal, and regardless of the number of bedrooms approved, we believe any Village project approval must have additional requirements imposed on the developer. FoSV includes in these a reduced entitlement timeline, traffic mitigation accountability, enhanced valley transportation, Squaw Creek improvements completed with first actual construction, rigorous monitoring to confirm adequate water supply, and performance metrics to ensure a viable and sustainable village.

INTRODUCTION

The Friends of Squaw Valley (FoSV) is a group of over 500 residents, second homeowners, and visitors formed in response to Squaw Valley Real Estate's (SVRE) proposed Village at Squaw Valley. Our mission statement calls for "environmentally sustainable, economically viable, and aesthetically compatible development in Squaw Valley while preserving its community character". We seek a Village development that balances the impacts of development with benefits to Squaw Valley and the region.

We request that Placer County take the following actions in regard to the Proposed Village at Squaw Valley Specific Plan.

I. PROJECT MUST BE SCALED BACK

Squaw Valley is geographically constrained as a small box canyon served by a single, narrow, 2-mile long road. It is the primary residence of about 500 households, the 2nd home for thousands more, and a recreation destination (including golf course and ski area) for additional tens of thousands. As a result of its small size and existing usage, there is very limited space for additional large-scale development. Moreover, access to Squaw Valley is through the narrow Truckee River corridor with little likelihood of ever widening the existing two-lane Highway 89. Any development within Squaw Valley impacts the entire Truckee-North Tahoe region.

The proposed Village project would allow condos, condo/hotels, and fractional ownership homes totaling 1500 bedrooms. In addition, it foresees 300,000 square feet of new commercial development, remote parking structures, and a 90,000 square foot Mountain Adventure Camp (MAC) primarily featuring an indoor water park. The build-out is projected to take place over a 25-year entitlement period.

FoSV contends the following concerns must be addressed:

Number of Bedrooms - FoSV's primary concern with the proposed development is the number of bedrooms proposed. The twenty-three areas of significant and unavoidable impacts cannot be adequately mitigated without a decrease in bedroom count. The draft Environmental Impact Report (dEIR) itself analyzed a 50% reduced density alternative that would reduce the traffic impact to less than significant. Importantly, this alternative section goes on to say that, with a 50% reduction in bedrooms (from 1500 to 750), the impacts on noise, views, water, pollution, etc. are all reduced as well.

Impacting this analysis is the contention that the dEIR has two fundamental flaws that understate the environmental impacts. These areas must be reanalyzed before any determination in number of bedrooms is made.

(1) Traffic - CEQA requires that the "traffic volume should represent the peak average winter ski conditions". The winter of 2011-12 used in the dEIR was significantly below average, with records showing almost no snow through the Christmas/New Year and MLK holidays. Because the peak traffic was low during those periods, then all impacts (such as noise and pollution) were therefore

underestimated.

(2) Water - Hydrologists and others question the accuracy of the Water Supply Assessment (WSA). The dEIR stated that the ongoing California drought “may produce a more severe multiple year drought than any within the available historical dataset or model study period”, but extreme drought conditions were not analyzed. The dEIR does not provide the verification of water availability, only assessment calculations by computer modeling. Environmental impacts due to groundwater drawdown were not analyzed in any meaningful manner.

Mountain Adventure Camp – SVRE’s proposal includes a 90,000 square foot recreation center (aka MAC). FoSV has serious objections to its proposed size and location. With a height of 108 feet, this structure overwhelms one’s initial view of the village. Moreover, FoSV contends such a “water park” is out of character in a place with an abundance of year round outdoor recreation. If such “indoor amenities” must be included in the project, FoSV advocates that the building be downsized or moved to a less visible location, or better still, that the amenities be spread out over the entire village.

Cumulative Impacts - To make matters worse, the proposed Village is not the only development forecasted for Squaw Valley. Within the same 25-year period, the WSA projects more than 1000 additional bedrooms in Squaw Valley alone. These include developments planned for the Resort at Squaw Creek, the Palisades, the Olympic Estates, the Plumpjack, and the Poulsen property. These cumulative impacts must be included in the revised EIR analysis.

FoSV is committed to “environmentally sustainable” development in Squaw Valley. Only with serious review of the above concerns can the Planning Commission and the Board of Supervisors determine where the tipping point is between population growth and level of impact.

II. OVERRIDING CONSIDERATIONS NOT JUSTIFIED

Under California Law, the County can only approve projects with significant and unavoidable environmental impacts by making a “Finding of Overriding Considerations”. In creating such a Finding, the Board must “balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks (CEQA 15093)”. Such a “finding” will look principally at economic considerations (e.g. tax revenue and jobs), but FoSV contends there are still no factors of sufficient benefit to override the environmental damage caused by the increased population density of 1500 units. Consider the following:

Tax Revenue: New hotels and condominiums will produce additional property tax and “Transient Occupancy Tax” (TOT) to Placer County. However, with the major developments planned throughout the North Lake Tahoe region, highlighted by new developments at Homewood, Northstar, and Martis Valley, a reduction in density in Squaw Valley would have a negligible impact on Placer County’s TOT revenues.

Jobs: A reduction in Village density would have only a slight impact on construction jobs in the North Tahoe area. Consider again the other developments planned throughout the North Lake Tahoe region, and recall the 1,000 additional bedrooms planned within Squaw.

Rehabilitation of Squaw Creek: This is the single specific, Squaw Valley-only, beneficial impact of the project. The amount of money to be spent by the developer on the creek will be proportional to the size of the project approved by the Board of Supervisors. But, there are other sources of funds for this work, e.g. the Friends of Squaw Creek have secured grant funding. The rehabilitation of the creek is essential and will proceed with or without the proposed project.

III. CONDITIONS OF APPROVAL

The County has the authority to impose “Conditions of Approval” on the developer that pertain to subjects not analyzed in the dEIR, impacts whose mitigations were simply inadequate or land use issues that were not addressed. While we do not approve of the currently proposed project, even a scaled back project requires the following conditions:

1. **Phasing of Construction:** To avoid isolated buildings that give the resort an “unfinished” look, construction phasing in the Village – Core Commercial area must maintain harmonious continuity with the present village. Phasing should not just be dependent on economic conditions.
2. **Limits on Construction Traffic:** Construction traffic must be limited to 8AM to 6PM during weekdays only. Also, construction traffic should not be allowed until the snowplows have totally cleared the roads, nor during triple coning, nor times of high visitor traffic.
3. **Traffic Density Mitigation:** SV Main Road triple coning is already a reality on busy days; efficacy of operation has been lacking at best. The Village operators must have radio equipped, trained traffic monitors at each intersection between the resort and Highway 89 to ensure the smooth flow of traffic and to ensure that residents are able to turn from side streets onto Squaw Valley Road. Moreover, an oversight committee should be formed to assure adequate performance of the traffic monitors.
4. **Confirmation of Adequate Water Supply:** Placer County must appoint an appropriate agency for insuring the adequacy of the water supply. This monitoring program should be established before any project permits are issued, define quantitative measures of “adequate”, and include (i) stop action criteria if adverse thresholds appear, (ii) verification of adequate supply as a prerequisite to each new project, and (iii) criteria for responding to impacts on aquifer drawdown as well as on the creek and riparian environment.
5. **Squaw Creek Rehabilitation:** The developer has submitted a plan to significantly improve the current condition of Squaw Creek. Rehabilitation of the creek improves its natural function and enhances the natural beauty of the area. To ensure this happens, creek improvements, regardless of approved density, must be initiated with the FIRST project approval and be completed within two years.
6. **Reassessment of Entitlement Approvals:** The developer requests entitlements for 25 years, but FoSV believes that 25 years is too long because unforeseen changes may occur. Instead, initial entitlements must be limited to 10 years. Additional entitlements should be granted only after an independent and comprehensive analysis is done that includes actual environmental impacts compared to those projected in Final EIR, as well as performance metrics in occupancy, economic impacts on the greater North Tahoe community, changes to climate, and economic trends in the ski, leisure and recreational industries.

7. **Preservation of Shirley Canyon:** Since LOT 19 proposes heavy maintenance operations at the mouth of Shirley Canyon and at the edge of Squaw Creek, a zoning change from Conservation Preserve and Forest Recreation to Village - Heavy Commercial is required. Potential spill of propane or vehicle maintenance fluids (diesel, oil, cleansers) poses substantial risk to Squaw Creek. The transit of numerous propane trucks to and from this location could create a potential disaster for the entire valley. The developer must find alternate location(s) for their maintenance and propane needs.

8. **Provide Transportation within Squaw Valley:** To mitigate traffic by residents and visitors staying in the valley and to reduce parking in the resort lots, the developer once proposed a scheduled, on-demand transportation system. It is not mentioned in the dEIR. A robust transit system for the entire valley should be a requirement of any new development.

9. **Reduce Existing and Expected Noise:** Noise standards along Squaw Valley Road already exceed Placer County standards. This SVRE proposal will exacerbate that condition. Homes along the north side of the Village area suffer magnified noise due to the echo effect of the box canyon location. The developer must find ways of not making the current bad situation even worse.

10. **More Substantive Parks and Recreation Improvements:** The inclusion of Parks & Recreation (P&R) improvements is a County requirement and the dollar amount is a function of the allowed bedroom count (i.e. population). Currently, most of the proposed P&R improvements involve enhancing existing hiking trails (although flush toilets at trailheads and a linear interpretative trail along the creek are included). However, these hiking trails already exist, and have been used for years. The FoSV advocates that the money must be spent on more substantive facilities for the local community to use throughout the year.

IV. BALANCING IMPACTS AND BENEFITS

In keeping with its mission, FoSV believes that the population density of the proposed Village development is too great and that the resulting impacts are incompatible with the alpine environment of Squaw Valley. A reduction in size is needed to find the balance point between benefits and impacts.

The Friends of Squaw Valley recommends to Placer County officials that the development, as proposed, must NOT be approved. Rather, the following steps should be taken. First, the Planning Commission must direct that the areas of traffic and water be reanalyzed to more accurately determine the real, resulting impacts. Second, the Planning Commission must recommend and the Board of Supervisors must agree to reject the proposed project as having too severe an environmental impact without sufficient local and regional benefits. And third, the Board of Supervisors must **require a recirculated, revised Specific Plan be submitted to the County at a bedroom count level that brings the impacts to an acceptable level.**