



December 5, 2019

Placer County Planning Department
Attn: Shirlee Herrington, Env. Coordination Services
3091 County Center Drive
Auburn, CA 95603
cdraecs@placer.ca.gov

Subject: Notice of Preparation for White Wolf Subdivision

Dear Ms. Herrington:

The Friends of the West Shore (FOWS) appreciates this opportunity to provide comments on the Notice of Preparation of an Environmental Impact Report (EIR) for the Proposed White Wolf Subdivision (Proposed Project). The Friends of the West Shore (FOWS) works toward 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 Alpine Meadows), and the cumulative impacts of these multiple projects on our communities and environment, which include increased Vehicle Miles Traveled (VMT) in the Basin, water and air pollution, noise, impacts to public health and safety, and other adverse impacts associated with increasing visitor and resident populations, both in the Basin and surrounding areas. The attached comments are provided to assist with development of an EIR for the Proposed Project that will comprehensively analyze the Proposed Project's impacts and identify adequate mitigation. We also herein incorporate comments submitted by Sierra Watch.

Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Judith Tornese,
President

Jennifer Quashnick
Conservation Consultant

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Transportation

Roadways and intersections within the Lake Tahoe Basin:

Peak traffic in the region already exceeds roadway capacity during busy periods, as reflected by the gridlocked conditions on surrounding roadways on many days in the winter and summer months. In addition, residents and visitors of the Alpine Meadows area will make vehicle trips within the Lake Tahoe Basin, creating additional vehicle impacts to the environment and public health and safety, especially along the west and north shores of Lake Tahoe. Yet the NOP states the analysis will only evaluate intersections and roadways outside of the Tahoe Basin.¹

The EIR needs to analyze the impacts of the Proposed Project and alternatives on roads and intersections within the Tahoe Basin, including the intersection of SR 89 and 28 and roadway segments including SR 28 through Tahoe City and SR 89 along the West Shore Emerald Bay (at minimum).

¹ “The analysis will include project specific impacts to the following intersections:

- SR 89 / Alpine Meadows Road
- SR 89 / Squaw Valley Road
- SR 89 / West River Street
- Alpine Meadows Road / White Wolf Road (future site access road)

The EIR will also evaluate impacts of the project on the following roadway segments, consistent with current County policies:

- Alpine Meadows Road (site access to SR 89)
- SR 89 (Tahoe City to Alpine Meadows Road)
- SR 89 (Alpine Meadows Road to Squaw Valley Road)
- SR 89 (Squaw Valley Road to West River Street)” [p. 33-34]

VMT in the Tahoe Basin:

According to TRPA's General Counsel², based on increased traffic counts, it is assumed that the Tahoe Regional Planning Agency's Vehicle Miles Traveled (VMT) threshold standard is no longer in attainment.³ Therefore, any increase in VMT in the Tahoe Basin is expected to contribute to violation of the TRPA threshold.

In fact, a comparison of traffic counts between 2015 and 2017 show a 9-11% increase in annual average daily vehicle trips and a 4-10% increase in peak hour traffic along the West Shore and in Tahoe City (attached), and observations of traffic in 2018 and 2019 indicates it has only increased.

VMT associated with the project, including cumulative VMT impacts from other projects and activities in the region (including but not limited to the Village at Squaw Valley Specific Plan, Alpine Meadows to Squaw Valley Gondola, and the Alpine Sierra Subdivision), must be addressed in the EIR. The analysis must also reflect the most recently available traffic information. Notably, the EIR analyses on several of the cumulative projects were performed years ago and traffic has since increased, even without the addition of the traffic from the approved but not yet constructed projects.

Growth Rate:

A recent EIR for another subdivision in Alpine Meadows (Alpine Sierra Subdivision, November 2018) indicated that the EIR applied an annual average growth rate of approximately 0.96% at the Alpine Meadows/SR 89 intersection, and a 0.6% growth rate along Alpine Meadows Road for the cumulative scenario analysis.⁴ However, as noted previously, actual traffic counts have shown significant increases in traffic in the area over just a two year time period.

The EIR must use the most recent traffic count and trend data to inform the traffic analysis.

Maximum potential number of vehicle trips:

The proposed homes are likely to be of a size that can accommodate large groups of people. The NOP states that the project will include four parking spaces/home,⁵ one additional parking space for guests, and a parking structure with twenty-two more parking spaces. This equates to more than five potential vehicles per unit. In addition, the project would include employee units and a clubhouse/lodge that would be used for events, which are apt to contribute even more traffic during peak time periods (when events typically occur).⁶

² 8/28/2019, TRPA Regional Plan Implementation Committee meeting

³ This cannot be confirmed until TRPA's transportation model has been updated, which is expected in 2020. However, TRPA has been informing project applicants that projects cannot increase VMT for this reason.

⁴ Alpine Sierra Subdivision Final EIR, p. 2-20.

⁵ "Each home would be required to have a garage with a minimum of two interior/enclosed parking spaces and two exterior parking spaces on-site." (p. 23)

⁶ "The Lodge would also be used for temporary events, such as weddings, community meetings, etc. and available for use by the private residents of the White Wolf subdivision, their guests and the public. The owners would have

The EIR needs to analyze the potential maximum number of people (and vehicles) that could access the project during a peak time period in the summer and winter months, and incorporate this into the traffic analysis.

Construction traffic:

The NOP estimates construction could last two to ten years.⁷ Construction-related traffic would further contribute to transportation impacts and impacts on public health and safety from congestion. In addition, the construction time period may coincide with two other recently-approved projects within Alpine Meadows: the Alpine Meadows to Squaw Valley Gondola and the Alpine Sierra Subdivision. Regional construction traffic would include these projects, plus multiple projects approved in the region, including but not limited to the Village at Squaw Valley Specific Plan and the Martis Valley West Specific Plans.

The EIR must evaluate the construction impacts to traffic within Alpine Meadows and regionally. The analysis must consider the cumulative construction impacts of other significant projects in the area that may also be under construction during the same time period.

Public health and safety:

Placing more people in high wildfire danger areas:

The project proposes to place more homes and people in fire-prone areas; this is no doubt a dangerous project from a public safety standpoint for the area's future residents and guests as well as everyone else in Alpine Meadows and the North Tahoe/Truckee Region. Making matters worse, climate change impacts are anticipated to bring drier conditions, more winds, and other factors which exacerbate fire danger. This reality has been seen in the historic wildfires in recent years, such as the Camp Fire in Paradise, CA, in 2018. During such an event, roadways become congested with people attempting to escape the fire, while the fire burns at speeds that cannot be outrun.

In fact, California's top fire officials are warning against building more homes in areas with high fire danger:

"Last year Ken Pimlott, the recently retired head of the California Department of Forestry and Fire Protection, said that government should consider stopping home building in threatened communities because of the substantial loss of property and lives."⁸

first rights to the use of the Lodge. It is anticipated that events could happen regularly throughout the summer months." (p. 23)

⁷ P. 29

⁸ <https://www.latimes.com/california/story/2019-10-28/kincade-getty-fire-prone-neighborhood-limit-homebuilding>. Similar articles include: <http://www.capradio.org/articles/2018/12/11/retiring-cal-fire-director-california-must-mull-home-ban-in-fire-prone-areas/>, <https://wildfiretoday.com/tag/ken-pimlott/> and <https://wildfiretoday.com/2018/12/28/should-homes-be-banned-in-fire-prone-areas/>.

As California's wildfire danger continues to grow, it is unconscionable that new large developments are being allowed in such dangerous areas. Whether a 51-year old planning document allows growth in this area or not (see more discussion below regarding the Alpine Meadows General Plan), the county cannot ignore current environmental conditions and trends, and should not be approving development that places more people in danger.

Further, the increased traffic (including construction traffic) on Alpine Meadows Road, SR 89 North (to Truckee) and SR 89 South (through Tahoe City and along the West Shore) will also impact public safety, as more traffic on the roadway would impede emergency responders and exacerbate roadway congestion in the event of evacuation from nearby communities (including those in the Tahoe Basin).

The EIR must include a comprehensive and robust analysis of the existing fire danger in the area, anticipated impacts of climate change on wildfires, and the impacts to public safety for the people and property that the Proposed Project will bring to the area, as well as the impacts to the safety of those already living and visiting Alpine Meadows and the Tahoe Basin.

Shelter-in-place concept:

The NOP notes the parking garage will provide a "shelter-in-place" facility (p. 24). It is unclear whether the garage will be sealed and equipped with adequate air systems that will function in the event of a wildfire (including a situation where main power supplies are not available) to ensure the air within the parking garage is healthy to breathe. Concern is not only regarding vehicle emissions in an enclosed space, but also the smoke and other air pollution associated with a wildfire is extremely dangerous. If shelter-in-place options do not protect people from breathing such pollution during a wildfire, people may still die or face significant health implications from breathing the air.

In addition, the public is not comfortable with the shelter-in-place concept and human instinct is often to try to flee the area of danger. Further, the inclusion of supposed shelter-in-place concepts should not be used to justify building a new resort community in a mostly undeveloped, high fire danger area.

The EIR must evaluate the feasibility of the proposed shelter-in-place facility, including the air quality, the likelihood people will use the facility versus attempt to flee, and the ability of the structure to withstand wildfire. The EIR must provide sufficient evidence that the shelter-in-place facility will protect people during a massive wildfire event.

Land Use:

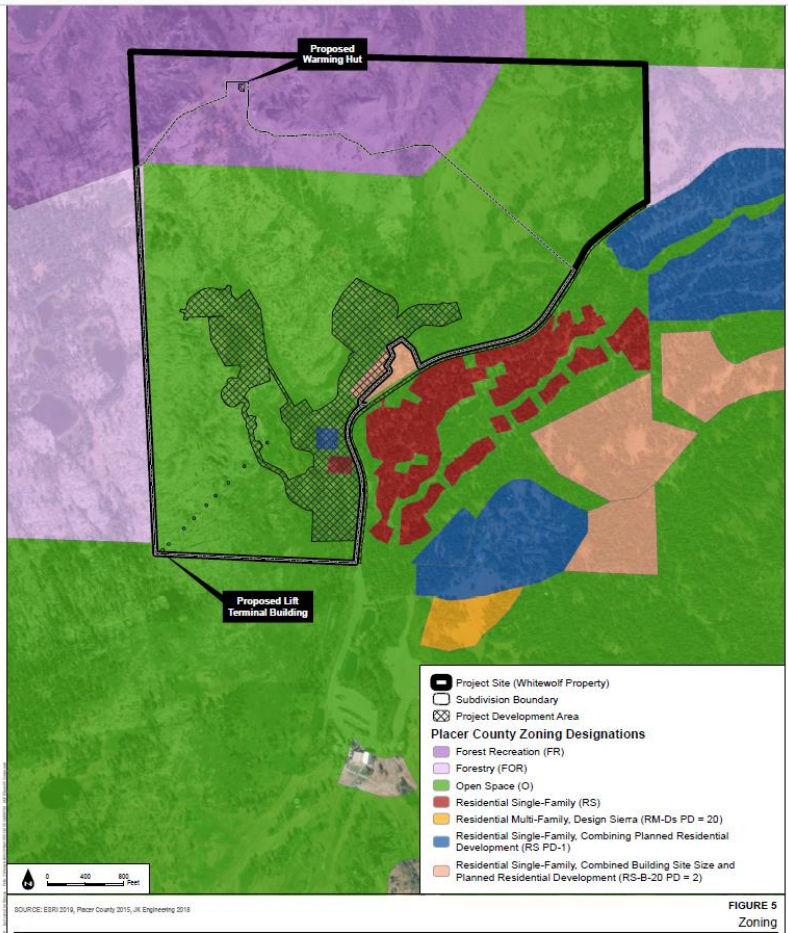
Conversion of open space to residential development:

The NOP states: "*The general plan amendment would apply a residential land use designation to some lands that are currently identified as Greenbelt by the Alpine Meadows General Plan and would apply a Greenbelt or Open Space land use designation to some areas currently designated for development that would remain undeveloped with the proposed project (Figure 4 and Attachment B). Exhibit G in*

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Attachment B identifies proposed land use designations and the net change in the area of each land use designation that would occur with the project. The proposed project would result in a net loss of approximately one acre of area identified as Greenbelt.” (p. 11).

However, these numbers do not appear to agree with the visual representation of the existing zoning compared to the proposed project area, which shows the development covering an extensive amount of land currently zoned as Open Space [or Greenbelt].



	EXISTING				PROPOSED				* ACREAGE SHOWN IS WITH SITE ONLY
	OPEN/ GREENBELT (+/- acres)	RES/ DEVELOPABLE* (+/- acres)	FOREST RECREATION (+/- acres)	TOTAL PROJECT SITE*** (+/- acres)	OPEN/ GREENBELT (+/- acres)	RES/ DEVELOPABLE** (+/- acres)	FOREST RECREATION (+/- acres)	TOTAL PROJECT SITE*** (+/- acres)	
ALPINE MEADOWS GENERAL PLAN	302	55	-		301	56	-		** ACREAGE SHOWN IS WITH SITE ONLY AND IT INCLUDES WHITE WOLF AND KT SOL
SQUAW VALLEY GENERAL PLAN	-	-	98		-	-	98		*** ALPINE MEADOWS ROAD AREA IS NOT INCLUDED
TOTAL	302	55	98	455	301	56	98	455	

(Source: NOP, Alpine Meadows General Plan Amendment, Exhibit G)

The EIR must clearly identify and label the acreages that will be modified by the proposed project.

1968 Alpine Meadows General Plan (AMGP):

Conflicts with AMGP:

The NOP refers to the 1968 Alpine Meadows General Plan to presumably support the development because most of the project falls within the “approximate limit of development” identified in the 51-year old plan.⁹ However, the NOP does not address the project’s failure to meet the first stated goal of the 1968 Plan:

“1. Maintain the open, natural, mountain-recreation character. All aspects of the vast, unique and outstanding physical beauty of the area must be consciously and continuously preserved.”

The Proposed Project will develop homes, facilities, an additional chair lift, and a ridgetop structure (the warming hut) across a canyon that is currently open and natural. It will mar the physical beauty of the area that the AMGP sought to preserve.

“4. Fixed Limits: Many developments have difficulty in defining and preserving their spatial limits; one area blends into another with no clear demarcations: ALPINE MEADOWS must preserve and maintain a permanent surrounding greenbelt, as a means of insuring finite limits to future development, to preserve the relationship to nature and to complement the residential amenity of the valley.”¹⁰

The Proposed Project will build into a significant portion of the existing greenbelt. When the approved Alpine Meadows to Squaw Valley Gondola, the proposed second lift, and the warming hut are also considered, development in this area will essentially cut entirely across the existing greenbelt up to the ridge.

In addition, the Proposed Project requires plan amendments precisely because it proposes development which conflicts with the AMGP, including:

- Development beyond the Approximate Development boundary line¹¹ and
- Conversion of Open Space and Forest Recreation to residential development¹²

⁹ “The majority of the anticipated area of disturbance, or the area where residential and resort development would occur lies within an area subject to the Alpine Meadows General Plan, which envisions planned developments within portions of the proposed development area and applies a Greenbelt designation to other portions of the anticipated disturbance area (Figure 4). The Alpine Meadows General Plan calls generally for development to occur at lower elevations in Bear Valley below the “approximate limit of development” identified by the general plan.” (p. 11)

¹⁰ AMGP, p. 18.

¹¹ “The project would rezone portions of the project site to RS-B-20 PD=2 and would require a general plan amendment to allow for development outside of the line denoting approximate limits of development in the valley and in areas identified as Greenbelt by the Alpine Meadows General Plan (Exhibits E and F in Attachment B).” (p. 31)

¹² “The project site includes approximately 360 acres zoned for open space (approximately 7.5 acres are within the Alpine Meadows Road easement), approximately 4.3 acres zoned for residential development, and approximately 98 acres zoned Forest Recreation.” (p. 31)

The EIR must analyze the consistency of the Proposed Project and cumulative development in the area with the AMGP.

Age of Alpine Meadows General Plan:

The AMGP is 51 years old. There have been dramatic changes over the past 51 years, with climate change and its associated impacts being at the top of that list. Wildfire danger has significantly increased in that time period and there is ample evidence that building in areas with high fire danger is not safe and should be avoided.

Climate change has also led to more extreme weather events. We recently suffered through a historical drought that affected water supply and worsened wildfire danger. Storms are getting warmer, with more rain-on-snow events anticipated, which increases avalanche danger. Even if the AMGP allowed a certain level of development, times have changed and the environmental analysis and future project decisions must be based on analyses of current and forecast conditions.

Further, the AMGP states that it aimed to look approximately 20 years out as that was “*about as far ahead as reasonably accurate forecasts could be made*”¹³ and that it would need to be modified as conditions changed. In fact, the plan called out the need for updates:

“The Plan must also be kept up to date. As policies and conditions change, the Plan must be changed because it is of little value if it does not reflect the latest and best thinking of all concerned.” (p. 2)

However, the plan has not been updated to reflect changing conditions; a 51-year old plan should not be used to justify development that is no longer appropriate given current environmental conditions.

As noted previously, the EIR must evaluate the impacts of the project based on existing conditions.

The NOP claims the rezone of Open Space to Single-Family Residential zoning is needed to “*make zoning consistent with the general plan land use designations applied to the site*” (p. 30). This statement does not appear to make sense, since most of the site is zoned as Open Space by the AMGP.

The EIR needs to clearly reflect the existing zoning of the project location.

Visual Impacts:

The proposed project will dramatically alter the visual quality of the area, as noted by the NOP:

“The project would require site grading and would result in construction of roadways and single family residential homes, a lodge, a ski lift and terminals, warming hut, maintenance facility, gatehouse, horse stables and bunkhouse, parking garage, and other associated structures within an area with minimal existing development. Development would introduce additional nighttime lighting. Vegetation in the area would be altered in accordance with a fuel modification plan to reduce the risk of wildfire. These proposed changes

¹³ “‘Long range’ means that the plan looks twenty years into the future. This is about as far ahead as reasonably accurate forecasts can be made...” (p. 2).

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would alter the visual quality of the project site as viewed from surrounding public areas including the Five Lakes Trail, adjacent ski resort and National Forest, Alpine Meadows Road, and residential areas.” (p. 32)

Not only will the proposed project have a significant effect on the visual quality of the area, but it will also affect the outdoor recreation experience of those who hike, camp, snowshoe, and ski along the Five Lakes Trail.

The EIR must include a robust analysis of the scenic impacts of the proposed project and alternatives (along with cumulative impacts from other projects such as the gondola) from the surrounding public areas, including visual simulations from multiple points along the Five Lakes Trail and Congressionally-designated Granite Chief Wilderness Area boundary. In addition, the impacts to Night Sky must be comprehensively assessed.

Water Supply:

The proposed project includes a new onsite well to provide water to two onsite underground 100,000-gallon water tanks. The two wells will rely on groundwater to serve the project.¹⁴ Extreme droughts (and reductions in groundwater supply) are anticipated to increase as a result of climate change. There were significant water supply concerns during the recent historic five-year drought.

The EIR must analyze the impacts to groundwater supply and flows, existing wells, and other impacts. The analysis must evaluate water supply with regards to extreme droughts over multiple years, such as the historic drought recently experienced in the area.

Air Quality:

The NOP states the EIR will analyze the air quality impacts of construction and operation of the project.

The EIR analysis must also account for the emissions from the snowmobiles and other motorized equipment that will provide winter access to Lots 24-33.

With public power safety shutoffs becoming ‘standard’, it is reasonable to expect that unless the project provides power through other means (e.g. solar panels), the residents will use generators during periods of power outages.

The EIR must incorporate the emissions associated with generator use. We recommend the homes and amenities be constructed to fully operate from renewable energy resources.

Recreational Impacts:

The proposed project will develop residences adjacent to a portion of the popular Five Lakes Trail, which provides access to the Granite Chief Wilderness Area. This will affect the entire recreational experience of trail users by placing development along the trail, creating significant visual impacts, noise, and other negative effects.

¹⁴ Initial Study, p. 27.

The EIR must comprehensively analyze the impacts to those recreating along the Five Lakes Trail.

Granite Chief Wilderness Area:

The proposed project will develop a portion of land within the congressionally-designated Granite Chief Wilderness Area boundary. Although this portion of the property is privately-owned, this is still an important fact that should have been disclosed in the NOP. Further, if developed, this would prohibit this portion of land from ever being purchased by the U.S. Forest Service and protected, as originally intended by Congress.

The EIR must disclose the impacts of the project on the congressionally-designated Granite Chief Wilderness Area.

Project Alternatives:

The NOP states the EIR “will evaluate a range of alternatives to the project that are capable of meeting most of the basic project objectives and would reduce or avoid any of the significant environmental impacts that could result from the project.” (p. 35). However, contrary to CEQA requirements,¹⁵ the project objectives are not listed in the NOP, thus preventing the public from having the opportunity to recommend alternatives that would meet the project objectives. We are concerned that this impedes the ability of the public to provide meaningful input on project alternatives at this time, although doing so is one of the key purposes of an NOP.

As the objectives appear to include developing an exclusive private residential development, we recommend the following alternatives be analyzed:

- A project based only on what is allowed by the current General Plan and the landowner’s existing entitlements, including the zoning (for example, there would be no conversion of areas zoned as Open Space or Forest Recreation to Single Family Residential Development);
- A project which excludes the homes that would not have year-round vehicular access (Lots 24-33 on Catch Valley Road);
- A project that is entirely situated within the Approximate Limit to Development line in the AMGP;
- A reduced project with 50% and 75% fewer homes and reduced amenities.

¹⁵ “15124. Project Description: The description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact...(b) A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project... Subsection (b) emphasizes the importance of a clearly written statement of objectives. Compatibility with project objectives is one of the criteria for selecting a reasonable range of project alternatives. Clear project objectives simplify the selection process by providing a standard against which to measure possible alternatives.” <http://resources.ca.gov/ceqa/guidelines/art9.html>

West Shore Calculations: Percent increase in traffic counts along SR 89: 2015 - 2017

Count location	Back (S/W of count pt.)												Ahead (N/E of count pt.)											
	Peak								Peak															
	Hour				Month				AADT				Hour				Month				AADT			
	2015	2017	Diff.	% change	2015	2017	Diff.	% change	2015	2017	Diff.	% change	2015	2017	Diff.	% change	2015	2017	Diff.	% change	2015	2017	Diff.	% change
Inside Tahoe Basin																								
Bliss SP Rd.	550	600	50	9.1	5800	6300	500	8.6	3500	3800	300	8.6	530	580	50	9.4	5800	6300	500	8.6	3400	3700	300	8.8
Rubicon Glen Dr.	530	580	50	9.4	5800	6300	500	8.6	3400	3700	300	8.8	500	540	40	8.0	5600	6100	500	8.9	3200	3490	290	9.1
El Do/Placer County Line	410	460	50	12.2	5400	5900	500	9.3	3100	3380	280	9.0	410	460	50	12.2	5400	5900	500	9.3	3100	3380	280	9.0
McKinney Creek Rd.	550	600	50	9.1	6800	7400	600	8.8	4000	4360	360	9.0	600	660	60	10.0	7000	7600	600	8.6	4300	4680	380	8.8
Ward Creek Bridge	1000	1250	250	25.0	10700	12100	1400	13.1	6600	7500	900	13.6	1000	1250	250	25.0	10700	12100	1400	13.1	6600	7500	900	13.6
Fir Ave.	1050	1250	200	19.0	11000	12100	1100	10.0	6900	7500	600	8.7	1150	1250	100	8.7	11200	12100	900	8.0	7000	7600	600	8.6
Tahoe City - 28/89	1450	1600	150	10.3	17300	18000	700	4.0	11100	12100	1000	9.0	1400	1450	50	3.6	16300	16800	500	3.1	10800	12000	1200	11.1
Outside Tahoe Basin																								
Squaw Valley Rd. ^a	1600	1400	-200	-12.5	12700	13300	600	4.7	9900	10000	100	1.0	1450	1450	0	0.0	12900	15000	2100	16.3	10300	11500	1200	11.7

Counts from Caltrans website: <http://www.dot.ca.gov/trafficops/census/volumes2017/>

AADT = Annual Average Daily Traffic

a) Decreases or no/low increases in peak hour traffic compared to peak month/AADT counts may be due to high congestion that reduces the number of vehicles passing a given count station during the peak period.