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**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.<sup>1</sup> 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.’

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<sup>1</sup> <http://www.sierrawatch.org/squaw-valley/>: “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](mailto: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<sup>2</sup> (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.<sup>3</sup>

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<sup>4</sup> - which means roughly 4,393 more occupants) to a community with less than 900 full time residents.<sup>5,6</sup> Such a massive project will overwhelm, and certainly adversely

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<sup>2</sup> “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)

<sup>3</sup> January 2014 Specific Plan draft, Introduction, p. 1-2.

<http://www.placer.ca.gov/departments/communitydevelopment/planning/villageatsquawvalleyspecificplan>

<sup>4</sup> According to the Initial Study, p. 1-4.

<sup>5</sup> “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<sup>7</sup> did not propose the commercial/employee housing component now shown for the East Parcel, 1.3 miles away from the original project area.<sup>8</sup> The NOP appears to wash over this change and dismisses any need

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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).

<sup>6</sup> “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)

<sup>7</sup> October 2012 NOP; p. 5, Exhibit 3, “Concept Plan”

<sup>8</sup> “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);

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*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"<sup>9</sup>). 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

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<sup>9</sup> *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 reasonable 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?

2. Impacts related to water supply:

- What will the long term water supply needs be and how will this be impacted by climate change?
- What will be the impacts on the aquifer levels and surrounding communities?
- Any required new water and sewage infrastructure must be equitably charged to the appropriate user.

3. Impacts to air and water quality:

The EIR must analyze the impacts to air and water quality from increased vehicles, more people, more need for utilities (e.g. heating, sewer, etc.);

- In addition, does the Valley experience thermal inversions which trap pollutants close to the surface, and if so, what are the impacts of potential build-up of more pollution from more cars and people?

4. Impacts from snow-making:

The EIR must analyze the impacts related to snow-making, which will likely become more pronounced and significant due to climate change;

The EIR must analyze:

- Impacts include water supply and demand;
- Increased Noise;
- Power needs;
- Access roads to reach snow-making system;
- Costs of snow-making considered with how long term operation of the resort will be ensured;

5. Noise impacts:

Increases in noise from more people, cars, snow-making, and other activities;

6. Impacts/loss of scenic views:

The EIR must clearly examine the impacts to scenic views throughout the Valley, including the use of visuals, simulations, etc. As noted in the Initial Study, as well as public surveys, views are extremely important in the Valley: *“The plan area is located within a visually appealing landscape, with mountainous terrain dominating much of the viewshed, including surrounding pockets of developed areas (primarily residential and commercial).”* (p. 2-4).

Yet the project proposes buildings up to 108 feet tall:<sup>10</sup>

The proposed project includes development of a Village Core, which would include several buildings ranging in height from 2 to 10 stories, or from 40 to 140 feet tall. Some buildings will also have one or two podium parking levels, with the maximum height of podium parking being 21 feet above grade. Therefore, overall building heights will range from 40 feet (2 stories with no podium parking) to 154 feet above

<sup>10</sup> Initial Study, p. 2-5; The Village at Squaw Valley Specific Plan, January 2014, p. B-11

ground level (tallest 10story building with anticipated 14 feet of podium parking above grade). Exhibit 10 shows proposed building elevations. Development of the proposed project would primarily replace surface parking lots with multi-story buildings and would alter views of the mountains and ski slopes visible to the south and west from Squaw Valley Road... (Squaw Valley Real Estate, LLC 2012).” [Emphasis added].

So far as we are aware, invisible or see-through buildings have not yet been invented. The proposed 108 sq. ft. tall buildings will no doubt block existing views. How does this proposed building height compare to the heights and visual mass of existing buildings? How will view sheds (not just narrow view “corridors”) be protected? The EIR must also clearly identify existing views, and potential impacts to all views under each alternative. The EIR must include appropriate visual images and simulations so the public can truly assess the impacts.

7. Public health and safety:

The proposed project would draw 1,000’s more overnight guests/residents into a hazardous area, potentially putting more people in danger while also making emergency access more difficult.<sup>11,12</sup>

- As noted in the Sierra Nevada Alliance publication “Dangerous Developments” (attached), there are serious public safety concerns that must be considered when proposing to place 1,000’s more people (not counting day visitors) in a fire-prone area. Concerns will only increase as climate change brings greater threats from fires.
  - ✓ Not only does this place more people in harm’s way, but it also makes emergency access and evacuation far more difficult. The EIR must carefully consider these impacts, the threats to people and structures, the impacts of delayed or difficult emergency response, evacuation plans, etc.

8. Impacts on power demand:

How will the proposed increases affect power demand? Will existing power supply infrastructure cover the increased demand for power? Does this project rely on increased capacity, such as what would result with the proposed

<sup>11</sup> E.g. “**Potentially Significant Impact.** Project construction may result in traffic delays and possibly road closures that could affect emergency access to the plan area and surrounding areas. While a construction management plan and traffic control plan would be required and would detail measures to ensure adequate emergency access during construction, it is unknown at this time what specific emergency access measures would be implemented.” (p. 2-58, Initial Study)

<sup>12</sup> **Potentially Significant Impact.** The State Board of Forestry identifies those lands where the California Department of Forestry and Fire Protection (CDF) has the primary duty for wildland fire prevention and suppression; these lands are commonly known as state responsibility areas. Lands are mapped by county in two categories: (1) wildland areas that may contain substantial forest fire risks and hazards (wildland areas or state responsibility areas) and (2) very high fire hazard severity zones. The plan area is located within a wildland area (California Natural Resources Agency 2003). Because the project would result in the placement of housing and other structures that would contain substantial numbers of people in a wildland area, thereby exposing people and structures to a risk of wildland fires, this impact would be potentially significant. This issue will be analyzed further in the EIR.” (Initial Study, p. 2-35).

Calpeco Electrical Line upgrade? What alternative mechanisms are in place to support increased power needs? In addition, what will the power demands be for the new Mountain Adventure Center and more snow-making?

9. Cumulative impacts to the Lake Tahoe Basin and Adjacent areas:

- The EIR must evaluate the cumulative impacts associated with current and likely future projects (built, permitted, and reasonably foreseeable), especially on traffic both in and around the project area (including Lake Tahoe), air quality, water quality, noise, forest management, etc. Impacts must also be analyzed in light of climate change, which is expected to aggravate existing impacts (e.g. with increased danger of wildfires, impacts to traffic and emergency access are likely to become more important).
- Other projects include, but are not limited to:
  - ✓ Construction of Homewood Mountain Resort (beginning this year);
  - ✓ Boulder Bay development at North Stateline (permitted);
  - ✓ Kings Beach Commercial Core Project;
  - ✓ Increases in Tahoe City development and population (planned in draft Area Plan; approved by TRPA 2012 Regional Plan Update);
  - ✓ Expansion of Northstar Resort (Final EIR to be next step);
  - ✓ Proposed rezoning on ridge between Northstar and North/West Lake Tahoe (the proposed “Martis Valley West Area Plan”<sup>13</sup>);
  - ✓ Increased development in Martis Valley and Truckee Area;
  - ✓ Increased populations in areas within a few hours’ drive;
  - ✓ Potential base-to-base gondola to Alpine Meadows.

Finally, where environmental mitigation and monitoring are necessary components of ensuring environmental impacts are mitigated and promised benefits are realized, the EIR must analyze how long term programs will be followed, how conditions will be adapted to, and what measurements will be required to ensure environmental resources are protected.

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<sup>13</sup> TRPA’s March Governing Board packet includes this proposal on p. 92, and states that “This planning process is underway and a scoping meeting for the associated EIS/EIR is tentatively scheduled for April 16, 2014.” <http://www.trpa.org/wp-content/uploads/March-27-2014-Governing-Board-Packet.pdf>

### III. Alterations to existing community character, neighborhoods, and lifestyle:

1. The proposed project will forever alter the demographics in the area;

According to the Initial Study (p. 2-49), the 2010 full time resident population of Squaw Valley was 879. During peak seasons, there are orders of magnitude more guests. The EIR must carefully evaluate the existing demographics in the area and analyze the impacts to the area from each project alternative. Impacts include changes in community character, sense of community, casual mountain lifestyle, full time/part time residents, seasonal visitation, employment, home ownership, ages, likelihood of families growing up, ability to afford to live in Valley, etc.

2. Impacts to existing residences

The proposed project will impact the quality of life, and property values, of existing developed properties. For example, the proposed parking, employee housing, and commercial use on the East Parcel is surrounded by existing residential uses. The EIR must fully assess these impacts.

3. Impacts to mountain culture, which is highly valued by locals and visitors;

As noted in the 2013 Community survey, and numerous comment letters submitted by various community and environmental groups, Squaw Valley's "mountain culture" is highly valued by most residents and visitors. This has also been referred to as the "soul of Squaw." This is a community of people who love being outdoors. It is impossible to define the values associated with an outdoor mountain lifestyle, but it would be a start to first engage the community in a plan update before proposing a large project (and thereby forcing the community to respond to the project, rather than consider their own ideas for a plan amendment). In addition, Squaw Valley offers outdoor recreation and activities which cannot be found or mimicked anywhere else. For visitors who want to ride rollercoasters and shop in expensive boutique shops, there are numerous other places to go, including Disneyland and numerous shopping districts just minutes or hours from Squaw Valley. But Disneyland cannot build Squaw Valley; it cannot build the mountains, the peaks, the valley, or the snow. Disneyland cannot build the community of Squaw Valley, the residents who love and cherish their environment and want to see their small community thrive, the fresh mountain air residents and visitors enjoy and expect, the unique mountain wildlife, and the inexplicable joy of being on the mountain, winter or summer.

4. Impacts to existing small/local businesses;

As typically happens when large corporations build these types of projects, the costs of buildings, retail space, rental space, etc., go up. Often, the only businesses which can afford these increases prices are not the local mom and pop stories.

Rather, there is a tendency to see local businesses be pushed out with chain/corporate owned businesses who can afford the new space. We have seen this happen throughout Lake Tahoe – a very clear example is the Heavenly Village on South Shore. Rents are expensive, yet visitors are funneled to the Village. As a result, long-time, locally-owned businesses throughout the community have either tried to relocate to the Village, only to go out of business, or simply gone out of business. The EIR must clearly assess the economic impacts of the proposed project, along with the objectives of the plan update. For example, if the community values small, locally-owned businesses, then will there maximum caps on the cost of rental space so locals can afford to keep their businesses? How will the proposed project impact existing businesses not located in the Village area?

5. Relationship of Real Estate to Lift Upgrades and Operation:

It is unclear how the proposed real estate sales relate to the operations on the mountain. If real estate profits are necessary to fund the operations of the existing ski resort, or relevant to investments in the community in some way, a comprehensive and very clear economic analysis must be included. Other questions include:

- After the real estate is sold and the resulting financial benefit goes to the developer and the investors, what assurances are there that the ski facility will be financially able to continue long term?
- Is the applicant suggesting that real estate profits are necessary to support required lift upgrades? Or just desired lift upgrades (that skiers and boarders may or may not be interested in paying more for)?
- If the applicant is suggesting the real estate sales are necessary to support resort operations, then what are those costs, and who will ensure long term coverage of lift operations - the developer, the condo owners, and/or the hotel operator?
- What alternative funding mechanisms have been considered to pay for any necessary resort upgrades? If they were dismissed, why?
- How will the profits from the Mountain Adventure Center (water park) be used?

*p. 7-8; 2013 Squaw Valley Public Survey*

	Strongly Support	Somewhat Support	Somewhat Oppose	Strongly Oppose	No Opinion	Total Respondents
Boutique hotels with amenities	18.15% 51	39.15% 110	18.15% 51	22.06% 62	2.85% 8	281
More condominiums and townhouses	4.24% 12	19.43% 55	30.04% 85	42.76% 121	3.53% 10	283
Additional recreational activities (tennis courts/pickleball, bike paths, ice rink, etc)	35.89% 103	44.95% 129	10.80% 31	5.92% 17	3.14% 9	287
120 foot tall indoor recreational center (water park, sky diving, climbing wall, bowling alley, arcade, etc)	10.42% 30	13.89% 40	17.01% 49	56.60% 163	2.08% 6	288
A movie theater	27.62% 79	42.66% 122	11.54% 33	13.64% 39	4.55% 13	286
A world class destination resort such as Vail or Whistler	18.82% 54	24.39% 70	23.34% 67	31.01% 89	2.44% 7	287
More summer events and festivals	35.56% 101	45.77% 130	7.75% 22	5.63% 16	5.28% 15	284
Larger convention facility	7.69% 22	26.57% 76	27.62% 79	30.42% 87	8.39% 24	286
Quadruple the existing bed base	2.44% 7	11.85% 34	17.42% 50	64.81% 186	3.83% 11	287

	Not concerned	Slightly	Somewhat	Very	Total
Maintaining the current culture of Squaw Valley	6.86% 19	14.08% 39	24.55% 68	55.23% 153	277
Preservation of historic aspects and Olympic heritage of Squaw Valley	10.39% 29	15.77% 44	23.66% 66	50.54% 141	279
Aesthetics of the proposed structures	4.32% 12	8.27% 23	23.02% 64	65.11% 181	278
Building heights taller than the current village	3.58% 10	4.30% 12	14.34% 40	78.14% 218	279
Views driving into the valley	5.73% 16	9.68% 27	24.37% 68	60.22% 168	279
Parking for day skiers	7.89% 22	9.32% 26	17.92% 50	64.87% 181	279
Traffic during ski season	2.89% 8	10.11% 28	16.25% 45	70.76% 196	277
Construction traffic	6.14% 17	9.39% 26	22.38% 62	62.09% 172	277
Environmental impacts of proposed project	3.96% 11	6.83% 19	14.03% 39	75.18% 209	278
A more urban environment	8.21% 23	10% 28	15.71% 44	66.07% 185	280
Improvement of Squaw Creek	16.30% 45	21.38% 59	26.09% 72	36.23% 100	276