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July 14, 2015

**Subject: Proposed Village at Squaw Valley Specific Plan Draft EIR**

Dear Ms. Krach:

The Friends of the West Shore appreciates this opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Proposed Village at Squaw Valley Specific Plan (“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 extensive impacts the Proposed Project will have on the environment and communities in and around Squaw Valley, however our comments focus primarily on impacts that will occur within the Lake Tahoe Basin. We herein incorporate by reference comments submitted by Sierra Watch and the Friends of Squaw Valley.

First, FOWS is especially concerned with the proposed project’s “significant and unavoidable” impacts on the Level of Service (LOS) on SR 28 east of SR 89 (e.g. through Tahoe City). This area already experiences LOS F during peak periods. The Proposed Project will further exacerbate these conditions by increasing both employee and guest-related traffic through the area, yet no mitigation is offered to reduce these impacts.

Second, as identified in our detailed comments below, the DEIR fails to assess the Proposed Project’s impacts within the Lake Tahoe Basin, including but not limited to traffic congestion on all affected roadways, increased Vehicle Miles Traveled (VMT), air, water, and noise pollution (primarily from increased VMT and vehicle trips), and impacts of increased traffic and visitation on Tahoe’s recreational areas, including Emerald Bay, Bliss S.P., Lake Tahoe’s beaches, and other recreational facilities that current and future Squaw Valley guests utilize.

We hope these comments will assist Placer County with the development of a comprehensive, technically-adequate FEIR, which sufficiently examines and discloses the impacts to the Lake Tahoe Basin. Please feel free to contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) if you have any questions.

Sincerely,

Susan Gearhart,  
*President*

Jennifer Quashnick  
*Conservation Consultant*

Attachments: Correspondence with Alex Fisch, Placer County Staff, May 2015

Cc: Laurel Ames, Tahoe Area Sierra Club  
Ed Heneveld, Friends of Squaw Valley  
Tom Mooers, Sierra Watch  
Darcie Goodman-Collins, League to Save Lake Tahoe  
Joanne Marchetta, Tahoe Regional Planning Agency  
TRPA Governing Board  
Jennifer Montgomery, Placer County Supervisor  
Carl Hasty, Tahoe Transportation District

## I. Significant and Unavoidable Impacts to SR 28 east of SR 89

FOWS is especially concerned with the proposed project's "significant and unavoidable" impacts on the Level of Service (LOS) on SR 28 east of SR 89 (e.g. through Tahoe City).<sup>1</sup> This area currently experiences LOS F during peak periods,<sup>2</sup> and congestion in Tahoe City has already been an important subject of community concern.<sup>3</sup> The proposed Project will exacerbate the already unacceptable conditions in this area, yet no mitigations are proposed to alleviate these impacts. The DEIR suggests that the only option could be increasing the capacity of the roadway, but because there are no plans for doing so, the impact would be "significant and unavoidable."<sup>4</sup> However, the DEIR fails to explore other options to reduce the Proposed Project's vehicle impacts to this area.

First, more mitigation measures are needed to reduce the Proposed Project's overall traffic impacts (for example, see comments by Friends of Squaw Valley). Second, measures to reduce guest and employee driving to and within the Lake Tahoe Basin could include incentives for employees who carpool, free and convenient employee and guest transit to Tahoe Basin areas, employee and guest shuttles, guest services that incentivize carpools, vans, or shuttle services to popular areas in the Basin (for example, Squaw Valley could establish a fun, convenient transit option to take guests to popular attractions such as Emerald Bay), and other mechanisms to reduce the traffic impacts within the Lake Tahoe Basin (which as noted below, include more than LOS impacts to SR 28 east of SR 89).

***The FEIR needs to examine additional and meaningful options to reduce the Proposed Project's traffic impacts to the Tahoe Basin, including ongoing monitoring and performance measures to ensure successful ongoing mitigation.***

FOWS is also concerned about the apparent lack of comments on the NOP by Lake Tahoe transportation agencies (e.g. the Tahoe Metropolitan Planning Organization [TMPO] and

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<sup>1</sup> "Because there are no available mechanisms to provide an acceptable LOS on the SR 28 and SR 89 segments in question, this impact would be significant and unavoidable." (DEIR, p. 9-63).

<sup>2</sup> "Not reflected in the intersection LOS is the congestion created along roadways away from the key intersections. In particular, drivers on SR 89 northbound and SR 28 in both directions through the Tahoe City core area experience substantial (20 minute or more) delays due to a combination of factors including pedestrian crossings, parking maneuvers, vehicular turning movements, and bicyclists. This LOS F condition occurs on peak summer days (generally early July through mid-August) from approximately 10:00 AM to 4:00 PM." (Tahoe City Mobility Plan, p. 5).

<http://www.tahoempower.org/OnOurWay/projects/TC-Mobility%20Existing%20Conditions.pdf>

<sup>3</sup> i.e. See public comments on Fanny Bridge project (Final EIR/S/EA) at:

<http://www.trpa.org/document/projects-plans/>

<sup>4</sup> "The *State Route 89 Transportation Corridor Concept Report* (Caltrans 2012b) identifies the segment of SR 89 between Deerfield Drive and West River Street as a concept four-lane conventional highway. The document lists a conceptual widening from two to four lanes. However, such a widening project is not currently included in any adopted planning documents or fee programs.

No capacity-increasing improvements are proposed for the segment of SR 28 east of SR 89 according to the *State Route 28 Transportation Corridor Concept Report* (Caltrans 2012c)...Because there are no available mechanisms to provide an acceptable LOS on the SR 28 and SR 89 segments in question, this impact would be significant and unavoidable." (DEIR, p. 9-63).

Tahoe Transportation District [TTD]) and the Tahoe Regional Planning Agency (TRPA), given the multiple impacts the Proposed Project will have *within the Lake Tahoe Basin*.

*We request Placer County initiate consultation with these agencies as soon as possible, as required by CEQA (see below).*

## II. Failure to adequately analyze impacts to the Lake Tahoe Basin

### A. Consistency with Regional Land Use Plans:

CEQA requires an EIR to examine project impacts from both a local and regional perspective. CEQA further requires that: “*Special emphasis should also be placed on environmental resources that are rare or unique to that region and would be affected by the project.*”

#### 15125. ENVIRONMENTAL SETTING

(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.

(b) When preparing an EIR for a plan for the reuse of a military base, lead agencies should refer to the special application of the principle of baseline conditions for determining significant impacts contained in Section 15229.

(c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.

(d) The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan or State Implementation Plan, area-wide waste treatment and water quality control plans, regional transportation plans, regional housing allocation plans, regional blueprint plans, plans for the reduction of greenhouse gas emissions, habitat conservation plans, natural community conservation plans and regional land use plans for the protection of the Coastal Zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica Mountains.

However, as noted in our comments, the DEIR fails to adequately assess and disclose all project-related impacts to the Lake Tahoe Basin, which not only qualifies as a “rare or unique” environmental resource,<sup>5</sup> but is also specifically listed in CEQA among areas where the EIR “*shall discuss any inconsistencies between the proposed project and applicable general plans...and regional land use plans for the protection of the...Lake Tahoe Basin.*” (§15125 (d)). As a result, the DEIR fails to meet CEQA requirements. The DEIR also includes no analysis of the impacts from increased use of in-Basin recreational

<sup>5</sup> See TRPA Bistate Compact. [http://www.trpa.org/wp-content/uploads/Bistate\\_Compact.pdf](http://www.trpa.org/wp-content/uploads/Bistate_Compact.pdf).

For example, Article I (A)(3) states: “a) It is found and declared that:...(3) The region exhibits unique environmental and ecological values which are irreplaceable.”

areas and facilities by Squaw Valley guests (e.g. as noted in our transportation comments, visitors in the North Tahoe regional area frequently visit many in-Basin recreational areas).

***The FEIR needs to fully analyze and disclose all impacts to TRPA threshold standards, and federal, state, and local standards applicable within the Lake Tahoe Basin, including but not limited to transportation (including LOS and VMT increases on in-Basin highways and arterial roadways), air quality (e.g. pollutant emissions within the Lake Tahoe Air Basin), and recreation (e.g. impacts and conflicts that will result from additional guest visits to recreation areas within the Lake Tahoe Basin in relation to recreational capacity and user experience of these areas). Project-related and cumulative impacts need to be addressed.***

### **B. Regional Significance:**

As required by CEQA (§15206(b)), a proposed project must be identified as having statewide, regional, or areawide significance if the project meets any of the following criteria:

“(4)(A): A project for which an EIR and not a Negative Declaration was prepared which would be located in and would substantially impact the following areas of critical environmental sensitivity: . . . The Lake Tahoe Basin.”

Yet the DEIR fails to note the proposed project as having statewide, areawide, or regional significance. We also cannot locate any information regarding consultation with the Tahoe Regional Planning Agency/Tahoe Metropolitan Planning Organization (TRPA/TMPO) and the Tahoe Transportation District (TTD), as required by CEQA (i.e. “transportation agencies affected by the project”). § 21092.4.<sup>6</sup> Transportation planning agencies within the Tahoe Basin must be consulted for this project (i.e. the DEIR does disclose the ‘significant and unavoidable’ impacts to LOS on SR 28 east of SR 89, although other impacts have not been assessed).

***The FEIR needs to include the assessment of these impacts throughout the entire Lake Tahoe Basin (e.g. including additional visitor and residential traffic in Kings Beach, Tahoe City, along the West Shore, at Emerald Bay, and around the Lake) as well as documentation of consultation with Lake Tahoe Basin transportation agencies.***

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<sup>6</sup> “(a) For a project of statewide, regional, or areawide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities within their jurisdictions that could be affected by the project. Consultation shall be conducted in the same manner as for responsible agencies pursuant to this division, and shall be for the purpose of the lead agency obtaining information concerning the project's effect on major local arterials, public transit, freeways, highways, overpasses, on-ramps, off-ramps, and rail transit service within the jurisdiction of a transportation planning agency or a public agency that is consulted by the lead agency. A transportation planning agency or public agency that provides information to the lead agency shall be notified of, and provided with copies of, environmental documents pertaining to the project.” § 21092.4

### III. Traffic Impacts in the Lake Tahoe Basin

#### A. Vehicle Miles Traveled in the Lake Tahoe Basin:

Lake Tahoe is a federally-designated Outstanding National Resource Water (ONRW).<sup>7</sup> The Lake Tahoe Bi-State Compact (cited previously) recognizes Tahoe's unique beauty, and the importance of protecting its fragile environmental resources. For these reasons, and per CEQA's requirements to assess impacts to the Lake Tahoe Basin (noted above), our comments on the NOP specifically requested the EIR to address the following issues (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?

Although some information has been provided in Exhibits 9-5 through 9-8 (excerpts below), contrary to statements in the document,<sup>8</sup> the DEIR does not address our comments as it fails to identify and disclose all traffic impacts to the Tahoe Basin. In fact, there is a general failure of the document to assess and consider specific impacts to the Lake Tahoe Basin, including vehicle trips and VMT, air emissions, housing/employee impacts (according to Exhibit 9-6, 63% of the existing winter employee trips are to/from the Tahoe Basin, suggesting the Basin provides housing for a significant number of Squaw Valley employees), and recreational impacts (from increased use of recreational facilities by Squaw Valley guests). Upon release of the DEIR, we requested the following information from Placer County:<sup>9</sup>

[The Air Quality chapter states:] "Upon full buildout of the Specific Plan, which would occur no earlier than 2037, the project would generate up to 2,821 trips per day and 85,398 VMT in Placer County and/or the MCAB during the peak day of the winter season and up to 8,410 trips per day and 172,168 VMT in Placer County and/or the MCAB during the peak summer season day. (According to the analysis presented in Chapter 9, "Transportation and Circulation," another 86,912 VMT would be generated by the project on a peak summer day that would occur outside of this area but this portion of VMT would be split among areas of Nevada, El Dorado County, and counties in the Sacramento and Bay Area regions [Fehr & Peers 2014]. Thus, mobile-source emissions associated with this portion of VMT would be split among multiple other air basins.)"

[With reference to this statement in the DEIR, we stated the following]:

I did not find any assessment of VMT in the Transportation chapter. Also, there does not appear to be a report or summary of the total VMT estimates that are presented in Appendix G (which appear to be from Fehr & Peers 2014)? Can you please point me to where this information is

<sup>7</sup> <http://www.epa.gov/region9/water/watershed/tahoe/>

<sup>8</sup> "All of the substantive environmental issues raised in the NOP comment letters and at the scoping meeting have been addressed or otherwise considered during preparation of this DEIR." (DEIR, p. 2-10)

<sup>9</sup> See attached email correspondence with Alex Fisch, May 20-21, 2015.

located? I'm looking for the information supporting the total VMT numbers presented in the AQ chapter, as well as the VMT generated within the Lake Tahoe Air Basin.

Placer County staff responded: *“The Transportation Chapter analyzed project impacts based on Level of Service criteria/thresholds of significance. VMT data was developed for the project and is included in Appendix G; that VMT data was utilized for the AQ and GHG modelling done for the EIR.”*

However, this did not address total traffic impacts, or the related air quality impacts, to the Tahoe Basin. As noted to County staff:

Regarding the VMT issue, there is no 'totaled' amount in Appendix G, nor in Chapter 9. All I could locate in the appendix were the modeled values for peak 15 minute and peak 60 minute VMT along selected routes, and the only route that partially addresses in-Basin impacts is the SR 28 to Alpine Meadows Drive segment (both directions); again, the outputs only list peak VMT values. There is no information regarding where the VMT totals referenced in the AQ chapter came from, nor estimates of the VMT generated by air basin/roadway.

Further, we requested in our NOP comments that the transportation and AQ impacts within the Lake Tahoe Air Basin be analyzed, and I have not located this information in the DEIR. I hope the consultants can provide this information and/or identify where it is located?

Staff’s response states: *“If you look in Appendix H you will find the VMT information is included there, and it was derived directly from the traffic modelling.”* However, the only VMT information included in Appendix H is the peak 15- and 60- minute VMT for the 28/89 intersection. We could not locate any information explaining the total VMT estimates referred to in the Air Quality section, or any information which specified the total VMT generated by the project **within the Lake Tahoe Air Basin**. As easily viewed in the Exhibits below, the proposed Project will generate additional traffic (and VMT) within the Lake Tahoe Basin, however the DEIR’s only summary and impact assessment of in-Basin impacts appears to be the LOS impacts on SR 28 east of SR 89.<sup>10</sup>

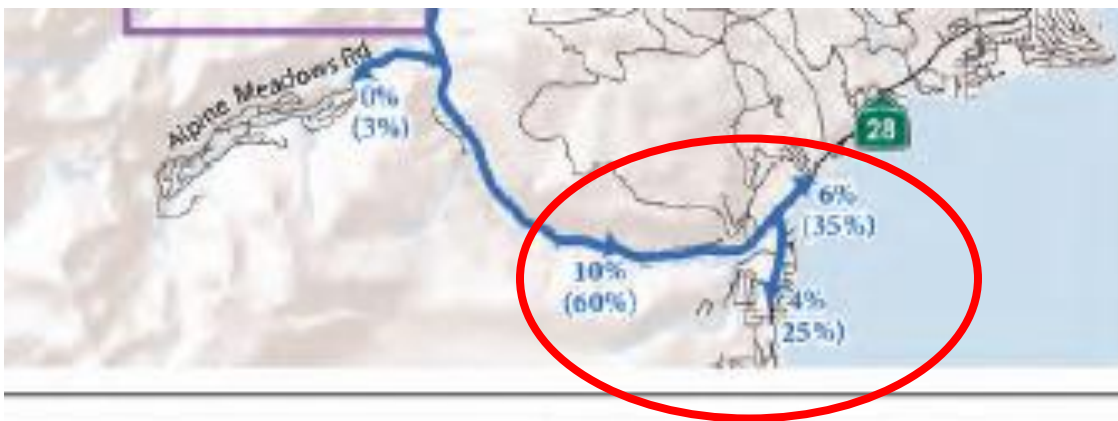


Exhibit 9-5: Winter Guest Primary and non-Primary Trip Distribution

<sup>10</sup> See pages: 30-31, 38, 45-46, 79-80, 87, 94-95, 124-125, 132, 139-140, 169-170, 176, and 184-185 (as noted in the .pdf reader).





Exhibit 9-6: Winter Employee Trip Distribution

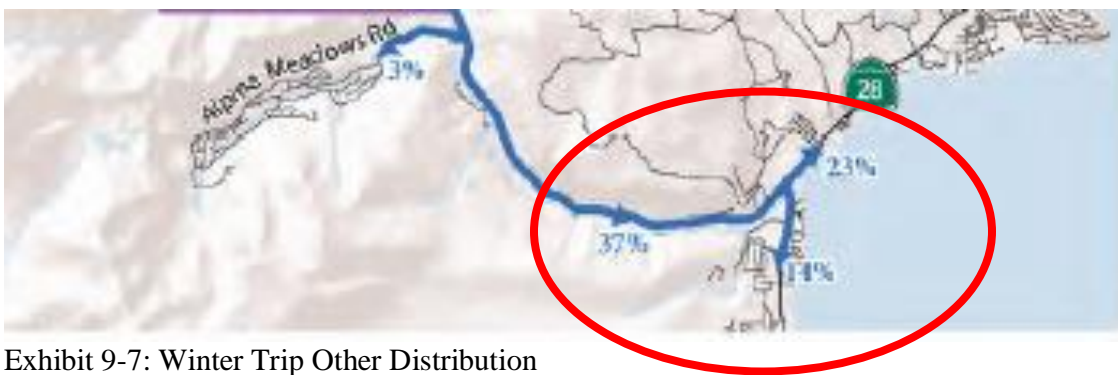


Exhibit 9-7: Winter Trip Other Distribution



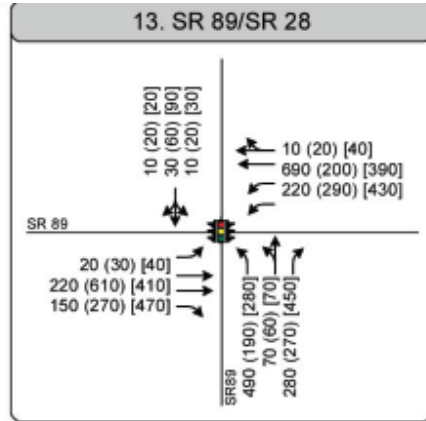
Exhibit 9-8: Summer Guest Trip Distribution



Exhibit 9-8: Summer Employee Trip Distribution

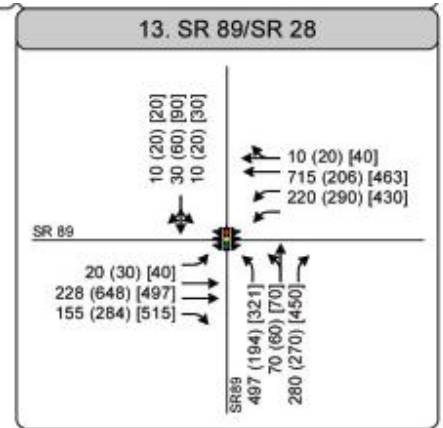


In addition, the comparison between the “Cumulative No Project” and “Cumulative Plus Project” Traffic Volumes (excerpts below)<sup>11</sup> indicates that in the summer, the project will increase summer peak traffic volumes driving south on SR 89 (toward the West Shore) by 45 vehicles, or roughly 10%, and driving north on SR 89 (from the West Shore) toward Squaw Valley by 41 vehicles, or roughly 15%. This clearly indicates increased VMT along the West Shore as a result of the project.



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**Cumulative No Project Traffic Volumes**



**LEGEND**

- Turn Lane
- Winter Saturday AM Peak Hour Traffic Volume
- Winter Sunday PM Peak Hour Traffic Volume
- Summer Friday PM Peak Hour Traffic Volume
- Study Intersection
- Traffic Signal
- Stop Sign
- Roundabout

**Cumulative Plus Project Traffic Volumes**



<sup>11</sup> DEIR, p. 8-18 to 8-22.

***The FEIR needs to assess the additional VMT generated in the Lake Tahoe Basin, including but not limited to the VMT on SR 89 North of Tahoe City, SR 89 South of Tahoe City and along the West Shore, and SR 28 through and east of Tahoe City (including Kings Beach), in order to analyze and disclose impacts of the project on the Tahoe Basin.***

### **B. Air and Water Quality Impacts from VMT in Lake Tahoe Basin:**

Air quality impacts resulting from the Proposed Project's VMT within the Lake Tahoe Basin need to be specifically evaluated and disclosed. California has classified the Lake Tahoe Air Basin as nonattainment-transitional for ozone,<sup>12</sup> and on-road motor vehicles are one of the primary sources of ozone precursors.<sup>13</sup> California has also classified the Lake Tahoe Air Basin as nonattainment for PM<sub>10</sub>; tire wear and tear and resuspension from wheels (and road sand and salt applications) contribute particulate pollution into the atmosphere.<sup>14</sup> Atmospheric deposition of nitrogen (from NO<sub>x</sub>) and particulates also negatively impact Lake clarity.<sup>15</sup>

***In order to assess the impacts of the project on air and water quality within the Lake Tahoe Air Basin, the emissions of hydrocarbons, NO<sub>x</sub>, and PM<sub>10</sub> associated with the Proposed Project's in-Basin VMT must be disclosed.***

### **C. Extent of Survey Data**

The DEIR relies heavily on a very limited data set to estimate future trips based on travel behavior. First, the winter data are all from just one year: the winter of 2011-2012. The DEIR does not identify how this year relates to other years, or whether the data are representative of average and peak conditions. For example, the DEIR does not disclose whether visitation was up or down compared to previous years. The region had just suffered a significant reduction in visitation due to the Great Recession; it is unclear whether the number of visitors in February 2011, let alone type of tourists (e.g. where they came from, their travel behaviors once they arrive, and whether they represent the anticipated makeup of future visitors), reflect average, or maximum, visitation. Surveys regarding summertime travel behavior are even more limited (just 136 summer employee responses and 205 summer guest responses, also collected only in 2011):

The following describes each type of survey:

- *On-Mountain Skier/Boarder Winter Weekend Surveys* (see Table 9-12): 293 skiers/boarders waiting at chair lifts or in mid-mountain locations were asked five questions relating to their travel mode, trip origin/destination, and other factors. The surveys were conducted from 10 a.m. to 2 p.m. on February 18, 19, 25, and 26, 2011.

<sup>12</sup> <http://www.arb.ca.gov/regact/2013/area13/area13fro.pdf>

<sup>13</sup> [http://www.arb.ca.gov/app/emsinv/2013/emseic1\\_query.php?F\\_DIV=-4&F\\_YR=2012&F\\_SEASON=A&SP=2013&F\\_AREA=AB&F\\_AB=LT&F\\_DD=Y](http://www.arb.ca.gov/app/emsinv/2013/emseic1_query.php?F_DIV=-4&F_YR=2012&F_SEASON=A&SP=2013&F_AREA=AB&F_AB=LT&F_DD=Y)

<sup>14</sup> Reuter, J.E., J. Allison, S.S. Cliff, T.A. Cahill, A. Gertler, M.J. Kleeman, J. Lin, D. Niemeier and T. VanCuren. 2000. The Lake Tahoe Air Quality Research Scoping Document: Determining the Link between Water Quality, Air Quality and Transportation. July. A Cooperative Proposal by the Tahoe Regional Planning Agency and the University of California, Davis.

<sup>15</sup> [http://www.trpa.org/wp-content/uploads/TEVAL2011\\_Ch4\\_WaterQuality\\_Oct2012\\_Final.pdf](http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch4_WaterQuality_Oct2012_Final.pdf)

- *Village at Squaw Valley Customer Winter Weekend Surveys* (see Table 9-13): 328 persons (non-employees) walking around the Village at Squaw Valley were asked seven questions relating to their travel mode, trip purpose, and other factors. The surveys were conducted from 10 a.m. to 5 p.m. on February 18, 19, 25, and 26, 2011.
- *Village at Squaw Valley Customer Summer Weekend Surveys* (see Table 9-14): 124 persons (non-employees) walking around the Village at Squaw Valley were asked seven questions relating to their travel mode, trip purpose, and other factors. The surveys were conducted during peak periods of August 5–7, 2011.
- *Squaw Valley Resort Winter and Summer Employee Surveys* (see Tables 9-12 and 9-14): A paper survey was distributed in winter and summer 2011 to all employees. A total of 106 responses from winter employees and 136 responses from summer employees were returned. The survey contained nine questions relating to work department, travel mode, work hours, residence, and other factors.
- *Village at Squaw Valley Overnight Guest Winter and Summer Weekend Surveys* (see Tables 9-12 and 9-15): As part of a larger survey, 49 winter guest responses and 205 summer guest responses were obtained from a web-based lodging survey instrument. Seven questions relating to their travel mode, trip origination/destination, and other factors were asked. (DEIR, p. 9-17).

The proposed Project is so large as to require up to 25 years of construction, and will significantly increase development in the area while drawing thousands of new visitors.<sup>16</sup> However, the assumptions regarding future visitor travel behaviors used in the traffic analysis in the DEIR are based on just one brief period of time in winter and summer; there is no information provided to assess whether this one period of time truly reflects typical/anticipated behaviors.

***The FEIR needs to provide evidence that the limited survey data represent anticipated travel behaviors and visitation, and/or include additional, targeted surveys more reflective of existing and anticipated travel behaviors and visitation, in order to assess potential traffic impacts from the Proposed Project.***

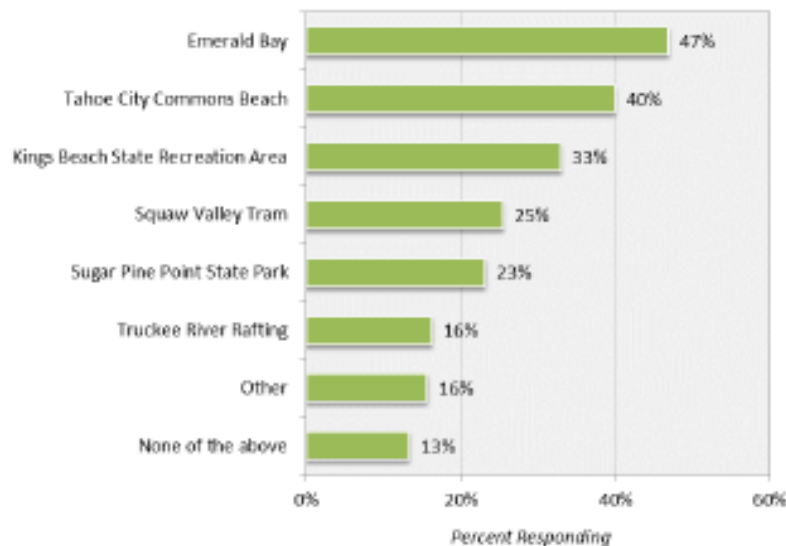
The DEIR indicates traffic will be generated on Tahoe’s west and north shores, but surveys do not address the intended location of Squaw Valley guests in the Lake Tahoe Basin. For example, as reflected by the data presented on pages 9-17 through 9-21, survey questions asked how many trips guests took outside of Squaw Valley. But there were no questions regarding *where* the trips were made to. Notably, a recent survey of visitors throughout the Tahoe/Truckee/Squaw Valley Region<sup>17</sup> found that “*The most popular attraction was Emerald Bay, with 47 percent of survey respondents indicating spending time during their visit there.*” (p. 6). In fact, more visits were made to locations within the Tahoe Basin than elsewhere:

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<sup>16</sup> “Peak overnight population, assuming full occupancy of all available units, could reach 3,625 guests and employees...” (DEIR, p. 5-11).

<sup>17</sup> “Location of lodging. Overnight visitors were staying in a variety of locations, primarily in Northstar (29 percent of overnight visitors staying there), Squaw Valley (21 percent), and Tahoe City (15 percent). Other locations of lodging were Tahoe Vista (7 percent), Kings Beach (7 percent), West Shore (6 percent), and Truckee (5 percent).” NLTRA Visitor Research, 2014. P. 2.

<http://nltra.org/documents/pdfs/RRC%20Summary%20NLTRA%20Summer%202014.pdf>

**Figure 7: Visited Attractions on Trip**

*In order to assess the traffic, air, water, noise, scenic, and recreational impacts of the Proposed Project on the Tahoe Basin, the FEIR needs to include information regarding VMT generated within the Lake Tahoe Basin, including but not limited to VMT associated with future summer and winter guest and employee trips.*

#### **D. Lake Tahoe Basin LOS requirements:**

Although the DEIR discloses impacts to the “v/c ratio” for the highway segment on SR 28 east of SR 89 (p. 9-63), the DEIR includes incorrect information regarding the existing LOS in this area, and also fails to assess the impacts with regards to TRPA’s requirements for LOS. First, as noted in the Tahoe City Mobility Plan<sup>18</sup> (excerpt below), the roadway segment through Tahoe City currently operates at LOS F during peak summer periods.

“Not reflected in the intersection LOS is the congestion created along roadways away from the key intersections. In particular, drivers on SR 89 northbound and SR 28 in both directions through the Tahoe City core area experience substantial (20 minute or more) delays due to a combination of factors including pedestrian crossings, parking maneuvers, vehicular turning movements, and bicyclists. This LOS F condition occurs on peak summer days (generally early July through mid-August) from approximately 10:00 AM to 4:00 PM.” (Tahoe City Mobility Plan, p. 5).

The Proposed Project would add 160 vehicles to a roadway segment which already operates at LOS F during peak summer periods;<sup>19</sup> the FEIR should be corrected to include this statement in addition to the c/v impact.

<sup>18</sup> <http://www.tahoemp.org/OnOurWay/projects/TC-Mobility%20Existing%20Conditions.pdf>

<sup>19</sup> “It is also identified in Table 9-23 that the proposed project would add 160 vehicles (both directions combined) during the summer Friday p.m. peak hour to the segment of SR 28 east of SR 89...” (DEIR, p. 9-63).

***The FEIR needs to be corrected to accurately reflect this.***

Also, as noted previously, CEQA requires the EIR to “discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans...[including]...regional land use plans for the protection of the ... Lake Tahoe Basin.” [Emphasis added]. The TRPA Regional Plan Goals and Policies require peak period LOS to be “E” (for no more than 4 hours) or better.<sup>20</sup> As the proposed project will worsen LOS on a roadway segment which already operates at LOS F during peak summer periods, the proposed project is inconsistent with “*the regional land use plan for the protection of Lake Tahoe,*” (in other words, the TRPA Regional Plan).

***The FEIR needs to clearly disclose this inconsistency.***

## **IV. Insufficient Mitigation:**

FOWS is not only concerned with the significant and unavoidable impacts to SR 28 and the as-yet-undisclosed increases in VMT in the Lake Tahoe Basin, but also the inadequate mitigation included to support transit. Mitigation Measure 9-7 will require that – only after ridership approaches capacity - the applicant contribute a fair share toward transit, or create a Community Service Area (CSA) or a Community Facilities District (CFD) to cover increased transit service. This mitigation specifically includes TART, which also provides regional transit service, including from the Tahoe Basin to Squaw Valley. The DEIR relies on Measure 9-7 to mitigate impacts to Caltrans highways (with the exception of SR 28 east of SR 89) to “less-than-significant.”<sup>21</sup>

### **A. Defining ridership capacity:**

The DEIR does not disclose what will be used to determine when ridership approaches capacity. For example, the DEIR does not disclose whether this mitigation will apply when ridership increases capacity based on existing service (in other words, no changes to improve convenience, frequency, or reduce the cost of transit for passengers). Because

<sup>20</sup> “T-10.7 LEVEL OF SERVICE (LOS) CRITERIA FOR THE REGION'S HIGHWAY SYSTEM AND SIGNALIZED INTERSECTIONS DURING PEAK PERIODS SHALL BE:

- A. Level of service "C" on rural recreational/scenic roads.
- B. Level of service "D" on rural developed area roads.
- C. Level of service "D" on urban developed area roads.
- D. Level of service "D" for signalized intersections.
- E. Level of service "E" may be acceptable during peak periods in urban areas, not to exceed four hours per day.

F. These vehicle LOS (level of service) standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project generated traffic in relation to overall traffic conditions on affected roadways.” [http://www.trpa.org/wp-content/uploads/Regional\\_Plan\\_Goals\\_Policies\\_Final-2012-12-12.pdf](http://www.trpa.org/wp-content/uploads/Regional_Plan_Goals_Policies_Final-2012-12-12.pdf)

<sup>21</sup> “The project may not provide an adequate supply of public transit service to meet the anticipated demand. Mitigation, including the creation of a community service area (CSA) or a community facilities district (CFD) to provide additional funding for increased transit service, has been recommended to reduce this impact to a less-than-significant level.” (DEIR, p. 17-5)

the frequency, cost, and convenience of transit service will all play a role in ridership,<sup>22</sup> the project applicant should be required to improve all of these factors *in order to* increase ridership. As it now reads, it appears the mitigation does not require these improvements, and only applies if and when ridership on existing services increases. If there are no changes which incentivize increased ridership and limit personal vehicle use, the FEIR cannot assume increased ridership and cannot therefore deduct new trips from the Proposed Project's impacts.

***The FEIR needs to include provisions which clearly identify when ridership will be considered to have reached capacity, and therefore, when this mitigation measure would be required. In addition, the FEIR needs to analyze the existing transit service, and changes to frequency, cost, convenience, destinations, and other factors that will be necessary to increase ridership, and what monitoring activities will be included to ensure sufficient transit service in the future. Further, the FEIR needs to identify measures to disincentivize personal automobile use, and how such measures will be implemented and monitored over time.***

#### **B. Inadequate and uncertain mitigation for transit:**

Mitigation Measure 9-7 requires KSL to either contribute its fair share to transit service, "or" that increased transit services be covered by the creation of a Community Service Area or Community Facilities District.<sup>23</sup> This places the burden of mitigation on local taxpayers and reduces the burden to the project applicant, as both options tax property-owners.

Once approved, a Special Tax Lien is placed against each property in the CFD. Property owners then pay a Special Tax each year. (California Tax Data: What is Mello-Roos?).<sup>24</sup>

When a CSD exists, the property owner will pay taxes to the CSD instead of the county for the services provided. Taxes are calculated upon assessed value of the land and improvements and placed on the property tax bill. (California Tax Data: What is a Community Services District?)<sup>25</sup>

The mitigation also specifies that if and when a CSA or CFD is formed, the project applicant is no longer required to make fair share payments to TART.<sup>26</sup> This means that the TART system – which is operated by the Placer County Department of Public Works Programs (notably a public agency)<sup>27</sup> – may have to pick up the tab in the future for

<sup>22</sup> [http://tahoempo.org/documents/monitoring/Mobility2030-2010Mon\\_Report\\_5-31-11.pdf](http://tahoempo.org/documents/monitoring/Mobility2030-2010Mon_Report_5-31-11.pdf)

<sup>23</sup> "Mitigation Measure 9-7: Contribute fair share or create a Community Service Area (CSA) or a Community Facilities District (CFD) to cover increased transit service... The project applicant shall commit to providing fair share funding to TART or forming a Community Service Area (CSA) or a Community Facilities District (CFD) to fund the costs of increased transit services prior to the recordation of the Initial Large Lot Final Map." DEIR, p. 9-66.

<sup>24</sup> <http://www.californiataxdata.com/pdf/Mello-Roos2.pdf>

<sup>25</sup> <http://www.californiataxdata.com/pdf/CSD.pdf>

<sup>26</sup> "If and when a CSA or CFD is formed, the project applicant shall no longer be responsible for making fair share payments to TART, and TART shall be fully responsible for adjusting bus service." (p. 9-66).

<sup>27</sup> Tahoe City Mobility Plan, p. 13; Also, see:

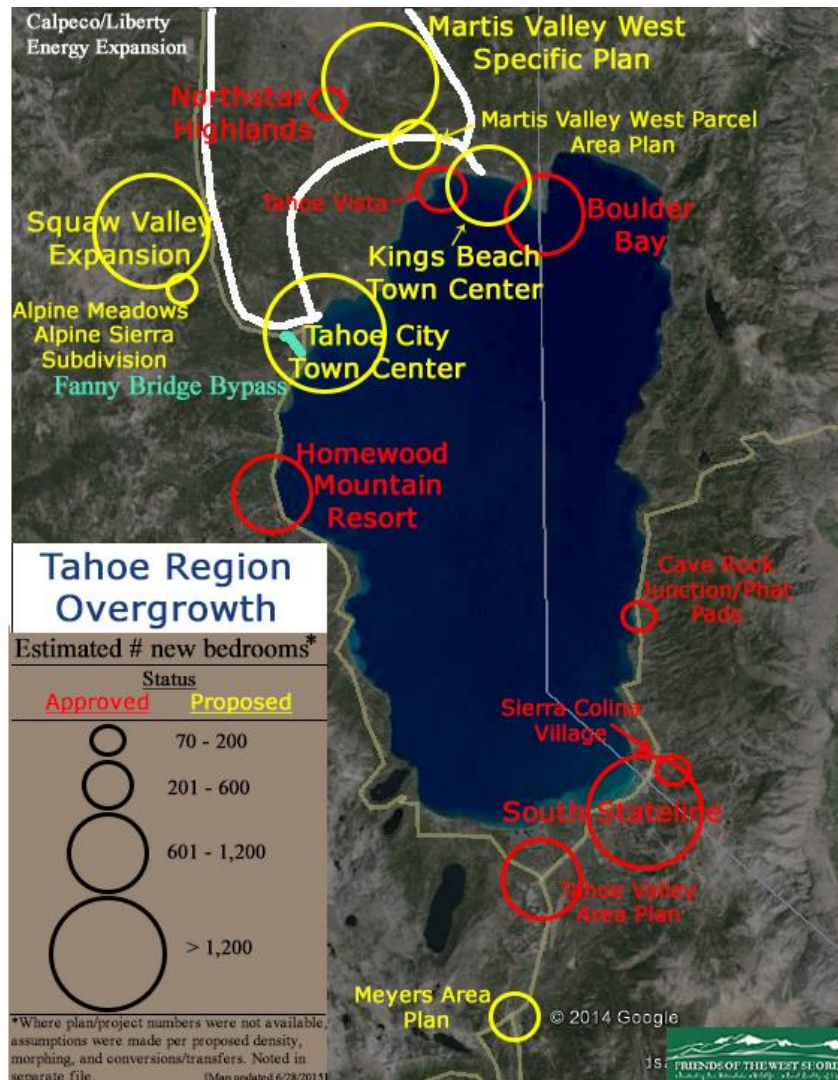
<http://www.placer.ca.gov/Departments/Works/Transit/TART.aspx>



transit services that the project applicant will rely on as mitigation for the applicant's project. This not only creates question regarding the certainty of future transit (as funding for public transit services fluctuates), but it also creates concern that a private project developer can build a project with significant environmental and community impacts, profit from doing so, and yet rely on the public to fund the project's mitigation.

## **V. Cumulative impacts to the Lake Tahoe Basin and Adjacent areas:**

In our comments on the NOP, we stated the EIR needs to 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, etc. For example, substantial increases in development and related traffic may occur from regional projects and plans with current applications, those undergoing environmental review processes, and/or those approved but not yet built. Examples are noted in the map below (FOWS, 2015).



- Such projects include, but are not limited to:
  - ✓ Expansion of the Homewood Mountain Resort (scheduled to begin in 2016);
  - ✓ Boulder Bay development at North Stateline (permitted);
  - ✓ Kings Beach Commercial Core Project (underway);
  - ✓ Increases in Tahoe City development and population (planned in the draft Placer County Tahoe Basin Area Plan)<sup>28</sup> and as approved by TRPA’s 2012 Regional Plan Update;
  - ✓ Expansion of Northstar Resort;
  - ✓ Proposed rezoning on ridge between Northstar and North/West Lake Tahoe (aka the proposed “Martis Valley West Area Plan”<sup>29</sup>);

<sup>28</sup> <http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>

<sup>29</sup> <http://friendswestshore.org/martis-valley-west-parcel-area-plan-aka-tahoe-ridgeline/>

- ✓ Increased development in Martis Valley and Truckee Area;
- ✓ Increased populations in areas within a few hours' drive; and
- ✓ Potential base-to-base gondola to Alpine Meadows.

The cumulative impacts of these projects need to also be analyzed in light of climate change, which is expected to aggravate existing issues and concerns. For example, with increased wildfire danger, impacts to traffic and emergency access are likely to become more important, and as climate change results in a reduced snowpack, and with the potential for ongoing drought, water supply concerns will increase.

Of the projects listed above, the DEIR's cumulative analysis<sup>30</sup> fails to include the Boulder Bay development, the Kings Beach Commercial Core Project, the Kings Beach and Tahoe City Town Centers and Tahoe City Lodge Pilot Project [as proposed in the draft Tahoe Basin Area Plan],<sup>31</sup> and the Martis Valley West Parcel Area Plan (notably, the application has been suspended, not withdrawn<sup>32</sup>).

***The FEIR needs to include the impacts of these additional developments in the cumulative impacts analysis.***

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<sup>30</sup> DEIR p. 18-3 to 18-5.

<sup>31</sup> <http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>

<sup>32</sup> <http://www.tahodailytribune.com/news/15304708-113/developer-residential-units-still-possible-above-north-tahoe>

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**Subject:** RE: VMT question -- Re: Request regarding Squaw Valley DEIR

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**From:** Alexander Fisch (AFisch@placer.ca.gov)

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**To:** jqtahoe@sbcglobal.net;

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**Cc:** susan@friendswestshore.org; jmtornese@aol.com;

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**Date:** Thursday, May 21, 2015 2:46 PM

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Jennifer,

If you look in Appendix H you will find the VMT information is included there, and it was derived directly from the traffic modelling.

Alex

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Alex Fisch

Senior Planner

Placer County Planning Services

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**From:** Jennifer Quashnick [mailto:jqtahoe@sbcglobal.net]  
**Sent:** Thursday, May 21, 2015 2:38 PM  
**To:** Alexander Fisch  
**Cc:** Susan Gearhart; Judi Tornese; Richard Moorehead  
**Subject:** Re: VMT question -- Re: Request regarding Squaw Valley DEIR

Thank you Alex, I appreciate the files and the response. You have quite a lot of information to deal with!

Regarding the VMT issue, there is no 'totaled' amount in Appendix G, nor in Chapter 9. All I could locate in the appendix were the modeled values for peak 15 minute and peak 60 minute VMT along selected routes, and the only route that partially addresses in-Basin impacts is the SR 28 to Alpine Meadows Drive segment (both directions); again, the outputs only list peak VMT values. There is no information regarding where the VMT totals referenced in the AQ chapter came from, nor estimates of the VMT generated by air basin/roadway.

Further, we requested in our NOP comments that the transportation and AQ impacts within the the Lake Tahoe Air Basin be analyzed, and I have not located this information in the DEIR.

I hope the consultants can provide this information and/or identify where it is located?

Thanks again,

~Jennifer

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**From:** Alexander Fisch <[AFisch@placer.ca.gov](mailto:AFisch@placer.ca.gov)>  
**To:** Jennifer Quashnick <[jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net)>  
**Cc:** Susan Gearhart <[susan@friendswestshore.org](mailto:susan@friendswestshore.org)>; Judi Tornese <[jmtornese@aol.com](mailto:jmtornese@aol.com)>; Richard Moorehead <[RMoorehe@placer.ca.gov](mailto:RMoorehe@placer.ca.gov)>  
**Sent:** Thursday, May 21, 2015 1:55 PM  
**Subject:** RE: VMT question -- Re: Request regarding Squaw Valley DEIR

Hello Jennifer:

Please call me Alex. Thank you for your patience; things have been a little hectic this week as you might imagine. Attached are the survey documents you have requested. Please see below for responses to your questions. Thank you

Alex

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Alex Fisch  
Senior Planner  
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**From:** Jennifer Quashnick [<mailto:jqtahoe@sbcglobal.net>]  
**Sent:** Wednesday, May 20, 2015 2:09 PM  
**To:** Alexander Fisch  
**Cc:** Susan Gearhart; Judi Tornese  
**Subject:** VMT question -- Re: Request regarding Squaw Valley DEIR

Hello again Mr. Fisch,

The DEIR Chapter on Air Quality states the following on page 10-15:

"Upon full buildout of the Specific Plan, which would occur no earlier than 2037, the project would generate up to 2,821 trips per day and 85,398 VMT in Placer County and/or the MCAB during the peak day of the winter season and up to 8,410 trips per day and 172,168 VMT in Placer County and/or the MCAB during the peak summer season day. (According to the analysis presented in Chapter 9, "Transportation and Circulation," another 86,912 VMT would be generated by the project on a peak summer day that would occur outside of this area but this portion of VMT would be split among areas of Nevada, El Dorado County, and counties in the Sacramento and Bay Area regions [Fehr & Peers 2014]. Thus, mobile-source emissions associated with this portion of VMT would be split among multiple other air basins.)"

I did not find any assessment of VMT in the Transportation chapter. Also, there does not appear to be a report or summary of the total VMT estimates that are presented in Appendix G (which appear to be from Fehr & Peers 2014)? Can you please point me to where this information is located? I'm looking for the information supporting the total VMT numbers presented in the AQ chapter, as well as the VMT generated within the Lake Tahoe Air Basin. The Transportation Chapter analyzed project impacts based on Level of Service criteria/thresholds of significance. VMT data was developed for the project and is included in Appendix G; that VMT data was utilized for the AQ and GHG modelling done for the EIR.

Thank you,  
~Jennifer Quashnick

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**From:** Jennifer Quashnick <[jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net)>  
**To:** "[afisch@placer.ca.gov](mailto:afisch@placer.ca.gov)" <[afisch@placer.ca.gov](mailto:afisch@placer.ca.gov)>  
**Sent:** Wednesday, May 20, 2015 10:17 AM  
**Subject:** Request regarding Squaw Valley DEIR

Hello Mr. Fisch,

Can you please provide me copies of the surveys used to compile the tables in the Transportation Section of the SV DEIR (Tables 9-12, 9-13, 9-14, and 9-15)? I cannot locate them elsewhere, although with over 2,000 pages, I apologize if I have missed them. (If so, please provide the specific location of the surveys). Attached.

Thank you,  
~Jennifer Quashnick

*Friends of the West Shore*