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Via e-mail – Hard copy to follow

Shirlee Herrington  
Environmental Coordination Services  
Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
cdraecs@placer.ca.gov

Re: Friends of the West Shore Scoping Comments on the Proposed Squaw Valley-  
Alpine Meadows Base-to-Base Gondola Project

Dear Ms. Herrington,

Thank you for this opportunity to comment on the scope of the environmental impact report (“EIR”) being prepared by Placer County for the Proposed Squaw Valley-Alpine Meadows Base-to-Base Gondola Project (“Gondola Project”). These comments are submitted on behalf of Friends of the West Shore (“FOWS”), a non-profit public benefit organization based in Tahoe City, California. FOWS dedicates itself to working toward the preservation, protection, and conservation of the West Shore of Lake Tahoe, nearby watersheds, wildlife, and rural quality of life, for today and future generations. FOWS’ goals extend to impacts to the West Shore from traffic, pollution, and development pressures created by the popular ski areas along Route 89, the main entranceway to Lake Tahoe’s West Shore. FOWS’ members frequently travel on Route 89. FOWS’ members actively engage in hiking in the Granite Chief Wilderness Area and along the Five Lakes Trail. Many of FOWS’ members also enjoy skiing at both Alpine Meadows and Squaw Valley.

FOWS appreciates the County’s effort to prepare a thorough Initial Study. FOWS concurs with the County’s determinations to address many potential impacts of the Gondola Project identified in the Initial Study. However, FOWS points out the following concerns and additional issues that should be thoroughly addressed in any EIR prepared by the County.

Impacts to the Granite Chief Wilderness Area: The EIR should rigorously evaluate all impacts to the Granite Chief Wilderness Area. As currently proposed, the alignment of the Project cuts directly through areas within the Wilderness Area’s mapped boundaries. In addition, although the alignment appears to fall within private lands within

the Wilderness Area boundary, the alignment is directly adjacent to fully-protected federal lands within the Wilderness Area. The study area for the EIR thus should extend into the Wilderness Area on each side of the proposed alignment as far as any discernable noise, visual, or other impacts may have on the wilderness character of the Granite Chief Wilderness Area. These impacts must be evaluated whether on the federal side of the proposed alignment or the private property-side. Particular attention should be paid to the Five Lakes and the Five Lakes Trail.

Relatedly, the EIR must explore alternative alignments for the Gondola Project. An alternative must be considered moving the Gondola Project away from the Wilderness Area's federal lands. An additional alternative also should consider impacts of an alignment that is located outside of the Wilderness Area boundary, including outside of the private lands within the boundary. An alternative also should include managing the privately held areas within the wilderness boundary as wilderness. FOWS is concerned that proceeding with the project would preclude this portion of the designated wilderness area from ever being managed as true wilderness.

The EIR should also explore an alternative of the Forest Service purchasing the private lands (the White Wolf property) or a conservation easement for the property within the Granite Chief Wilderness Area boundary.

The EIR should carefully lay out the purpose, need, and objectives of the proposed Gondola Project. The objectives should not be written so as to improperly limit the County's consideration of a reasonable range of alternatives intended to reduce or eliminate the Project's impacts.

Lack of Clear Description of Access Roads: A shortcoming of the Initial Study is the lack of information regarding access roads that are planned for constructing the Gondola Project and subsequently maintaining the towers. Although no mention is made of an access road in the Initial Study, the Forest Service's documents depict a lengthy access road that would appear to be well over a mile in length. This is inconsistent with the Initial Study's assertion that "[t]he proposed project does not extend roads." Initial Study, p. 2-46. Presumably, such a road would not be paved. The inclusion of this road has significant repercussions on the Gondola Project's water quality, erosion, slope stability, habitat, migratory corridors, and potential growth inducements, among other impacts, all of which should be thoroughly considered in the EIR.

Emergency Access: FOWS requests that the County revisit its determination not to evaluate the Project's effects on emergency access to the Project area. This seems fairly obvious on a cumulative impact level, given the extensive development currently being proposed or anticipated for Squaw Valley and the Alpine Meadows area. The EIR should conduct a thorough review of the sufficiency of the Squaw Valley Fire District's Wildland Fire Evacuation Plan and the Alpine Meadows' Community Wildfire Protection Plan to address the need to evacuate large numbers of additional residents and users that

would be expected by anticipated new development, including additional development induced by the Gondola Project and the possible use of the Project outside of the ski season during times of fire risk. Likewise, evacuation risks posed by additional construction equipment should be evaluated.

Cumulative Impacts: FOWS agrees with the Initial Studies conclusion that “[w]hen taken together with the effects of past projects, other current projects, and probable future projects, the project’s potential impacts could be cumulatively considerable.” FOWS requests that the EIR pay particular attention to the Project’s cumulative impacts and, given the explosion of projects currently being proposed or underway in Squaw Valley as well as the Alpine Meadows area, make sure to include all proposed and reasonably foreseeable projects in the evaluation.

FOWS questions whether the Gondola Project will not in the future include summertime use. The existing gondolas at Squaw Valley operate during the summer. To the extent that summertime use is reasonably foreseeable, FOWS believes its impacts during the summer time should be fully explored. In addition to any pressure to open the proposed gondola to summer use, impacts from the possibility of adding trails from the proposed Squaw Valley Mid-Station to the Five Lakes Trails and additional access to the Wilderness Area should be analyzed.

Growth Inducing Impacts: As for the Alpine Meadows area, no mention is made of the private landowner’s own proposed development and additional ski lift that would link with Alpine Meadows anticipated new Roller Lift and the Gondola Project. <http://mountainminds.net/future/a-light-in-the-white-wolf-tunnel/>. This latter project, coupled with the access road necessary for the Gondola Project, calls into question the determination in the Initial Study that the Gondola Project would not have any growth – inducing impacts. It would appear designed to have near-term growth-inducing impacts in the Alpine Meadows area. The presence of a road would encourage additional development in that area. The Gondola Project would induce additional development of ski trails, including tree removal and other impacts, along the west side of Alpine Meadows and within the White Wolf property. The fact that the Gondola Project is intended to bring more visitors to the ski areas heightens the concern that additional development would be more likely in the vicinity.

Cumulative Impacts in Tahoe Basin: The Initial Study does not mention the likely cumulative impacts that will result to the Lake Tahoe Basin from the Gondola Project and the numerous other projects proposed for Squaw Valley and Alpine Meadows. FOWS requests that the EIR carefully evaluate the Project’s cumulative impacts on the significance thresholds applicable to the Lake Tahoe basin. In particular, the concentration of development currently proposed and anticipated in Squaw Valley and the Alpine Meadows area may significantly increase vehicle miles traveled within the Tahoe Basin. This in turn, may affect both air, water quality, emergency access and other issues within the Basin.

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FOWS again appreciates the opportunity to participate in the County's decision-making process for the proposed Gondola Project. FOWS urges the County to proceed carefully on this proposed Project and the numerous other development proposals for Squaw Valley and the Alpine Meadows area in order to prevent significant impacts from undermining the recreational experiences people seek in these areas and from incremental burdens to the Lake Tahoe basin.

Sincerely,



Michael R. Lozeau  
Lozeau Drury LLP  
on behalf of Friends of the West Shore