



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
michael@lozeaudrury.com

May 31, 2016

Via e-mail – Hard copy to follow

Eli Ilano
Tahoe National Forest Supervisor
c/o NEPA Contractor
P.O. Box 2729
Frisco, CO 80443
scoping_comment@squawalpinegondolaeis.com

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

Dear Supervisor Ilano,

Thank you for this opportunity to comment on the scope of the environmental impact statement (“EIS”) being prepared by the Tahoe National Forest (“TNF”) 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.

Placer County has prepared an Initial Study for the Gondola Project. TNF should address each of the many impacts identified in the County’s Initial Study. In addition, FOWS points out the following concerns and additional issues that should be thoroughly addressed in TNF’s EIS.

Impacts to the Granite Chief Wilderness Area: The EIS 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 EIS 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 EIS 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. 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 EIS 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. TNF's 1990 Management Plan states that, for the Granite Chief Wilderness Area, TNF shall "[a]cquire private in-holdings as the opportunities arise." 080 Granite Chief Management Area - Page V – 418. Accordingly, a purchase alternative should be fully explored in the EIS. Likewise, because the Gondola Project proposes to use federal lands, the EIS also should explore other alternatives that leverage purchase of some of the private land holdings within the Wilderness Area. TNF cannot, consistent with the Management Plan, approve a project that lops off or encourages development of all of the private land within the Wilderness Area boundary between Squaw and Alpine Meadows that TNF should be positioning itself to purchase.

The EIS 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 TNF'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 County's 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 of an access road is mentioned 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 EIS.

Emergency Access: The EIS must evaluate the Project's effects on emergency access to the Project area. This is obvious on a cumulative impact level, given the large amount of development currently being proposed or anticipated for Squaw Valley and the Alpine Meadows area. The EIS 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 from 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 Study's 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 EIS 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, the EIS must take into account 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 County's Initial Study that the Gondola Project would not have any growth-inducing impacts. On the contrary, the two related projects 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 also 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 EIS must take into account 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 EIS 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 air, water quality, emergency access and other issues within the Basin.

FOWS appreciates the opportunity to participate in TNF's decision-making process for the proposed Gondola Project. FOWS urges TNF to proceed carefully on this proposed Project in light of the numerous other development proposals in 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

cc: Susan Gearhart, FOWS
Jennifer Quashnick, FOWS