



Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603

August 7, 2016

Subject: August 11, 2016 Item: Proposed Village at Squaw Valley Specific Plan

Dear Members of the Planning Commission:

The Friends of the West Shore (FOWS) appreciates this opportunity to provide comments on the Proposed Village at Squaw Valley Specific Plan (VSVSP), including the final EIR and staff report. 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, and represents community interests from Emerald Bay to Tahoe City. Although FOWS is concerned with the extensive impacts the VSVSP will have in and around Squaw Valley, our comments focus primarily on impacts that will occur within the Lake Tahoe Basin.

Unfortunately, the FEIR fails to address many of our concerns and questions regarding the DEIR's analysis of impacts to the Tahoe Basin. The VSVSP will:

- Cause significant and unavoidable traffic impacts within the Tahoe Basin, including impacts to Level of Service (increased congestion) and Vehicle Miles Traveled (VMT);
- Further threaten public health and safety by contributing to traffic that will impede emergency access and evacuation routes; and
- Result in additional air and water pollution in the Basin.

As you heard at your July 7, 2016 hearing regarding another project that will increase traffic in the Basin (the Martis Valley West Parcel Specific Plan) – notably to a smaller degree than the VSVSP, emergency responders are already concerned about heavy traffic conditions.

FOWS asks you to deny this project as proposed, and ensure that if/when a revised alternative is provided, a smaller-sized project is considered, and adequate analyses of impacts and requirements to employ all feasible mitigation options are incorporated. FOWS also recommends that County staff coordinate with the TRPA and other appropriate entities to define and address the capacity of roadways in the North Tahoe/Truckee Region to provide emergency access and evacuation routes prior to contributing further to these problems.

Additional comments regarding the FEIR and staff report are attached. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

I. Vehicle Miles Traveled (VMT) in the Tahoe Basin

As noted in our comments on the DEIR, as well as in the FEIR's response to comments,¹ VMT in the Tahoe Basin negatively impacts the environment (especially water and air quality) and public health and safety (i.e. more congestion impedes the ability of people to evacuate and access by emergency responders, notably already a concern along Tahoe's West Shore²). We appreciate the FEIR's attempt to better quantify the VMT impacts to the Lake Tahoe Basin in Master Response 3.1.2.³ However, our comments regarding the adequacy of the analysis in the DEIR were not addressed, and we remain concerned the project's traffic impacts will be even greater than the significant and unavoidable impacts already estimated in the EIR.

A. Comparison to TRPA's VMT Threshold Standard:

VMT comparison to TRPA Threshold Evaluation:

The FEIR compares the project's in-Basin VMT to the 2010 VMT estimates for the Tahoe Basin, and concludes that the project would not violate the VMT standard because it would increase VMT by 23,842 miles, or 1.2%,⁴ and therefore not violate TRPA's regional standard. The 2011 VMT included in TRPA's 2011 Threshold Evaluation Update report (released with the RPU EIS and RTP/SCS EIR/S in 2012) was just 1.5% better than (or below) the TRPA VMT standard,⁵ which equates to approximately 30,958 VMT. In other words, if VMT increased by more than 1.5% (or 30,958 miles) above 2011 levels, the TRPA standard would be violated. Although we believe the EIR underestimates the project's traffic impacts (as noted in our comments on the DEIR, and other public comments), the estimated VMT with the VSVSP included is just 0.3% (or 7,116 miles) below the TRPA standard – leaving little room for error before TRPA's VMT standard is violated (a significant impact when considered in terms of cumulative impacts as discussed below). For example, the project's current traffic counts assume just 55% full time occupancy. It is far more likely that occupancy upward of 100% will occur on peak summer Friday (the period upon which VMT is based) – generating far more than the 1.2% increase in the FEIR.⁶ In another example, as noted elsewhere in our comments, a recent NLTRA survey found that 47% of visitors to the North Tahoe/Truckee region visited Emerald Bay. This number is far greater than the 0.03%

¹ See FEIR, p. 3.2.4-117 – 118.

²

<http://www.leagle.com/decision/In%20CACO%2020151222052/CALIFORNIA%20CLEAN%20ENERGY%20COMMITTEE%20v.%20COUNTY%20OF%20PLACER>

³ “The addition of the project's VMT to the 2010 summer value would result in 2,008,442, which would remain below this VMT threshold...the resulting VMT generated by the VSVSP would not exceed the TRPA VMT threshold (a threshold not used in any of the documents).” (FEIR, p. 3-25 to -26).

⁴ “The project's summer Friday VMT estimate within the TRPA boundary is 23,842. Total VMT in the TRPA boundary was estimated in the Regional Plan (at Table 3.3-5) to be 1,984,600 for summer 2010 conditions. The project would result in an estimated 1.2 percent increase in VMT within the TRPA boundary.” (FEIR, p. 3-25 & 3-26)

⁵ http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch3_Air-Quality_Oct2012_Final.pdf; 2011 VMT was 2,036,642 or 1.5% better than the standard.

⁶ We herein incorporate comments submitted on the DEIR and FEIR by Sierra Watch regarding occupancy rate assumptions.

value assumed in the FEIR, Appendix C (excerpt below), suggesting the EIR underestimates the number of visitors that may drive to Emerald Bay.

Guest Trips				
Start	End	Percent of total guest trips	ADT	VMT
SR 89/Alpine Meadows Rd	Stateline	0.08	219	7,910.2
SR 89/Alpine Meadows Rd	Echo Summit	0.02	55	2,169.3
SR 89/Alpine Meadows Rd	Emerald Bay/Camp Richardson	0.03	82	2,161.1
SR 89/Alpine Meadows Rd	South Y	0.03	82	2,530.8
SR 89/Alpine Meadows Rd	Sand Harbor	0.02	55	1,276.4
SR 89/Alpine Meadows Rd	Incline Village	0.06	164	3,188.2
SR 89/Alpine Meadows Rd	Kings Beach	0.05	137	1,780.4
SR 89/Alpine Meadows Rd	Tahoe City	0.12	329	1,347.6
Total		0.41	1,123	22,363.9

VMT Comparison to draft Placer County Tahoe Basin Area Plan EIR/S

According to the draft June 2016 Placer County Tahoe Basin Area Plan EIR/S, released after the final VSVSP EIR, the “Existing summer daily regional VMT is estimated to be 1,937,070, or 93,868 below the TRPA threshold standard based on the most recent modeling completed to support the Tahoe Regional Transportation Plan (TRPA 2016).” (TBAP DEIR/S, p. 19-18⁷). In other words, the most recent VMT estimate in the Tahoe Basin is 93,868 miles below violating the regional VMT standard. The VSVSP will add 23,842 miles⁸ (which as noted elsewhere, is underestimated) – equal to an approximate increase of 25% of the 93,868 difference. The proposed Martis Valley West Parcel Specific Plan (MVWPSP) estimates 13,745 additional miles of VMT in the Basin,⁹ adding another 15%. Traffic counts for 2015 and 2016 are not available yet, however it is clear among locals and visitors that traffic on our roadways has increased substantially over the past two years and traffic from growth outside of the region is expected to continue to grow.¹⁰ It is also obvious from long term trends¹¹ that traffic fluctuates, and we have experienced much higher traffic levels without any substantial increases in development.

⁷ http://www.placer.ca.gov/~media/cdr/ecs/eir/tahoebasin/cdr/deir/19_cumulative.pdf?la=en

⁸ “On a peak travel day, the Project would generate approximately 23,842 VMT within the Tahoe Basin. Total VMT in the TRPA boundary was estimated in the Regional Transportation Plan of TRPA to be 1,984,600 for summer 2010 conditions. Based on this benchmark, which is considered the best available data, the Project would result in an estimated 1.2 percent increase in VMT within the TRPA boundary. The addition of the project’s VMT to the 2010 summer value would result in 2,008,442 VMT, which remain below the VMT threshold of 2,067,600. Therefore, the resulting VMT generated by the Project would not exceed the TRPA VMT threshold.” (Staff report, p. 33)

⁹ http://www.placer.ca.gov/~media/cdr/ecs/eir/martisvalleywestparcel/finaleirmay2016/appendix1/apdx%20o_vmt_calcs_trpa.pdf?la=en

¹⁰ <http://www.sierrasun.com/news/21965274-113/public-meetings-on-tap-to-address-future-of>

¹¹ http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch3_Air-Quality_Oct2012_Final.pdf; see p. 3-17 and 3-49.

We ask the Placer County Planning Commission to consider the impacts this additional traffic will have on Tahoe's roadways, environment, and public health and safety, both individually and cumulatively, and recommend denial of the project as proposed.

B. LOS Impacts in the Tahoe Basin

The FEIR concludes significant and unavoidable impacts to LOS in Tahoe City (Staff Report, p. 57). As local and visitors can attest to, conditions through Tahoe City during peak periods in 2015 and 2016 have frequently reached gridlock. This happened without the additional traffic from Homewood Village Resort, Boulder Bay, Martis Valley West Parcel Specific Plan, the Tahoe Basin Area Plan, the Tahoe City Lodge, or the myriad of other projects currently proposed in the North Tahoe/Truckee Region that will draw more people and cars to the area, and especially without the impacts of the VSVSP. Not only does congestion cause environmental impacts, but it also threatens public health and safety by impeding emergency access by first responders and evacuation routes in the event of an emergency such as a wildfire. Although TRPA may be responsible for land use in the Basin, Placer County is responsible for the protection of the public throughout the entire County; this includes the Lake Tahoe Basin. The VSVSP's additional, significant and presumably unavoidable impacts will only further threaten life, property, and the environment. As you heard at your July 7, 2016 hearing regarding the MVWPSP,¹² emergency responders are very concerned about the impacts of adding more traffic to our roadways.¹³

We ask you to deny this project as proposed and consider a smaller scale development, additional mitigation, and coordination with the TRPA to define the capacity of roadways in the North Tahoe/Truckee Region to provide emergency access and evacuation routes prior to contributing further to these problems.

C. Air quality impacts within the Lake Tahoe Air Basin:

In our comments on the DEIR, we stated the EIR needed to evaluate and disclose the impacts to the Lake Tahoe Air Basin. The FEIR responded with erroneous information, stating that the Lake Tahoe Air Basin is part of the Mountain Counties Air Basin (MCAB),¹⁴ and that emissions for the MCAB were estimated.

A simple view of the California Air Resources Board (CARB) website would have shown that the Lake Tahoe Air Basin is a separate and distinct Air Basin. This is not only

¹² <http://www.sierrasun.com/news/22914496-113/martis-valley-west-developer-opponents-look-to-final>

¹³ Beth Kenna, reading a statement from NTFPD's Chief, stated they "share concern about the added challenges to evacuation," and California Highway Patrol Cpt. Ryan Stonebraker stated that there are limited areas of ingress/egress, and "the more population there is, the more tourists there are, the more things happen. I can tell you that personally just working the Fourth of July." Cpt. Stonebraker also noted that they have bike patrols because that's the only thing that can get around on peak periods like July 3rd.

¹⁴ "The air quality thresholds used in the analysis are based on the air basin that would be directly affected by project development and traffic, the Mountain County Air Basin, which includes the Lake Tahoe Basin." (FEIR, p. 3.2.4-116). Also, we remind the FEIR authors that the correct term is the "Mountain Counties Air Basin."

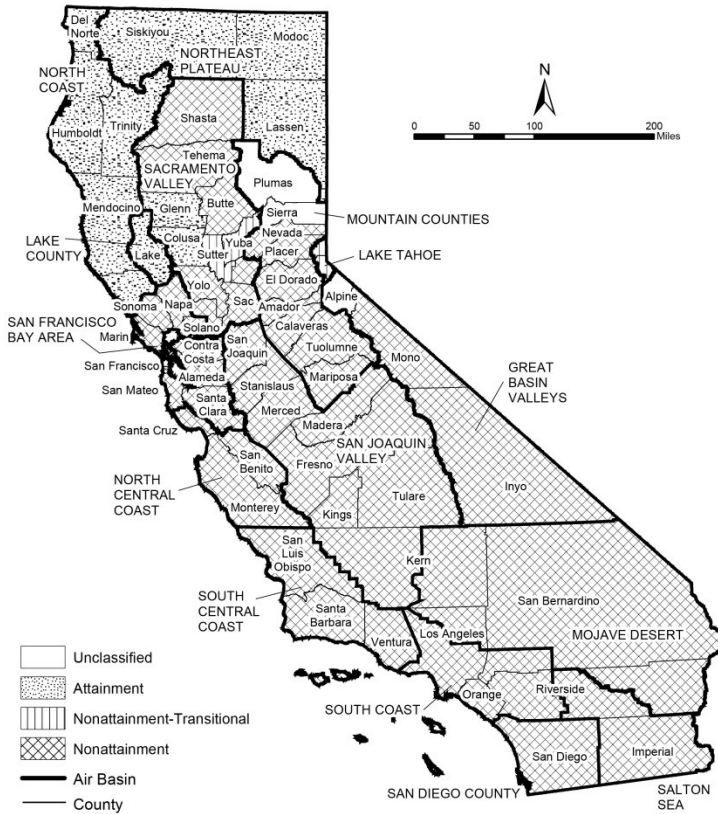
reflected by CARB maps (examples below) clearly delineating the air basins, but also in the CARB's designations for state standards, which clearly indicate individual designations for the Lake Tahoe Air Basin and Mountain Counties Air Basin.¹⁵ It is surprising the document preparers made such an error. In addition, that the TRPA failed to comment on this issue does not negate the public's ability to do so.



<http://www.capcoa.org/maps/>

¹⁵ <http://www.arb.ca.gov/desig/adm/adm.htm#state>

**2013
Area Designations for State
Ambient Air Quality Standards
OZONE**



Source Date:
June 2013
Air Quality Planning Branch, AQPSD

http://www.arb.ca.gov/degis/adm/2013/state_o3.pdf

The EIR fails to evaluate and disclose the air quality impacts of the proposed project in the Lake Tahoe Air Basin.

D. Fanny Bridge Revitalization Project:

The FEIR states that the Fanny Bridge Revitalization Project will “improve traffic conditions at the SR 89/SR 28 intersection, resulting in traffic impacts at this intersection [that are] less severe than identified in the DEIR.”¹⁶ However, as noted in our extensive

¹⁶ The Fanny Bridge Revitalization project is listed in Table 18-2 of the DEIR as a cumulative project. Page 18-18 of DEIR describes this project and indicates that at the time the DEIR technical analysis was being completed, a preferred alternative for this project had not yet been selected. Accordingly, the DEIR conservatively assumed no improvements would be constructed at the SR 89/SR 28 intersection for the cumulative conditions analysis. It would have been speculative to assume any of the six alternatives would be constructed because a preferred alternative had not been chosen, particularly given that once completed as estimated in 2018, the Fanny Bridge Revitalization Project would improve traffic conditions at the SR 89/SR 28

comments on the Fanny Bridge EIR submitted to TRPA and Placer County,¹⁷ the Fanny Bridge project is likely to result in more traffic impacts in the long term. Therefore it cannot be relied upon to mitigate impacts from the VSVSP.

II. Climate Change:

The FEIR also failed to respond to our comments¹⁸ regarding the evaluation of how climate change will affect the project's cumulative impacts. For example, we noted that climate change means increased fire danger, thus questioning how the project will impact the evacuation of people from the area. Also, changes in weather and snowpack will affect water supply. Rather than address this question, the FEIR's response merely focuses on one aspect of our question – regarding the cumulative project list – and fails to address concerns about climate change impacts.¹⁹ As the CEO of Squaw Valley Ski Holdings recently said, “Climate change has already begun to reveal itself as persistent drought in the Sierra Nevada, lower snowpack, increased number and scale of forest fires, and the substantially increased volatility of weather patterns across our great state.”²⁰ It is perplexing that the CEO proclaims concerns over these impacts, yet Squaw Valley Ski Holdings proposes a project that will substantially increase GHG emissions, further threaten public health and safety by placing 1,000's more people in high fire danger areas with only one road to evacuate the valley, and create increased demand for water supplies that may decrease due to climate change (notably all impacts which are dismissed through various claims and/or simply noted as ‘significant and unavoidable’ while lacking sufficient consideration of mitigation measures in the FEIR).

III. Cumulative Impacts:

A. Cumulative Project List:

The FEIR responds to our comments regarding the lack of adequate cumulative analysis (labeled O3-15) by referring to the Cumulative Project List in Table 18-2 of the DEIR: “*Table 18-2 (pages 18-3 through 18-5) in the DEIR provides the list of probable future*

intersection, resulting in traffic impacts at this intersection less severe than identified in the DEIR. See <http://www.tahoetransportation.org/fanny-new-1>. (FEIR, p. 3-25).

¹⁷ <http://friendswestshore.org/fanny-bridges-r-89-realignment/>

¹⁸ “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.” (Labeled as comment O3-15, FEIR, p. 3.2.4-112).

¹⁹ “Table 18-2 (pages 18-3 through 18-5) in the DEIR provides the list of probable future projects that are in the project vicinity and that are likely, in combination with the project, to result in cumulative impacts. The list includes 18 projects, most of which overlap with the 10 projects listed in the comment, but also including Truckee and the Tahoe Vision Plan. It does not include projects, such as the Meyers Area Plan and several other projects on the south and south east side of Lake Tahoe because these projects are sufficiently distant that they are not likely to combine with the project to create cumulative impacts. Also, see Table 18-1 in the DEIR for an explanation of the geographic area of cumulative analysis, and the Master Response regarding the cumulative analysis.” (FEIR, p. 3.2.4-121).

²⁰ <http://www.laketahoenews.net/2016/05/climate0change-poses-risk-to-nev-economy/>

projects that are in the project vicinity and that are likely, in combination with the project, to result in cumulative impacts. The list includes 18 projects, most of which overlap with the 10 projects listed in the comment, but also including Truckee and the Tahoe Vision Plan...Also, see Table 18-1 in the DEIR for an explanation of the geographic area of cumulative analysis, and the Master Response regarding the cumulative analysis.” (FEIR, p. 3.2.4-121).

The Cumulative Project List in Table 18.2 does not quantify the potential cumulative impacts from regional area projects; it simply lists the projects. The table also does not include known substantial North Tahoe developments that have been approved but not yet built, (for example, Boulder Bay) or have been in the planning stages for some time (i.e. the Placer County Tahoe Basin Area Plan and the Martis Valley West Parcel Area Plan²¹/Brockway Campground). Notably, the MVWSP, which is simply listed in the table, estimates increased VMT in the Lake Tahoe Basin to be over 13,000 VMT,²² or approximately a 0.7% increase. The cumulative impacts of these projects alone (a 1.9% increase) are greater than 1.5% difference between the 2010 VMT and TRPA VMT standard, and therefore based on the FEIR’s VMT information, **can be expected to violate TRPA’s threshold standard.** This should be clearly discussed and disclosed in the FEIR.

With regards to the referenced Master Response for cumulative analysis, it specifically only responds to projects in the Alpine Meadows area,²³ and therefore does not address the impacts of other regional projects.

B. Cumulative Travel Demand Modeling:

Although the DEIR states that the study area is partially included in the TRPA travel demand model,²⁴ this does not appear to be the case. Additionally, in October 2015, TRPA staff and Board members discussed concerns about transportation impacts from out of Basin projects, including Squaw Valley.²⁵ Although TRPA staff appear to have

²¹ This Area Plan was proposed within the Tahoe Basin in 2014; the application has been suspended but not withdrawn. Brockway Campground, proposed for the same project area, emerged in January 2015, before the DEIR was released (<http://moonshineink.com/news/tahoe-basin-taken-out-martis-valley-west-project>).

²² “On a peak travel day, the project would generate approximately 13,745 VMT within the Tahoe Basin.” (FEIR, p. 3-17). FOWS estimates from information included in the DEIR Appendix K indicate over 15,000 VMT, as noted in our comments on the DEIR. MVW DEIR estimates were available months before the release of the VSVSP FEIR, and were notably completed by the same consulting firm. Therefore, it is reasonable to expect the FEIR to include the MVWSP’s VMT estimates.

²³ “Numerous comments state that the DEIR’s cumulative analysis should have considered projects in the Alpine Meadows area, such as the proposed Base-to-Base Gondola project, Alpine Sierra Development, and White Wolf. These projects are discussed below following a discussion of the CEQA context for cumulative impact analyses.” (FEIR, p. 3-63).

²⁴ “The study area is partially included in the travel demand models of the Town of Truckee and TRPA.” (DEIR, p. 18-17).

²⁵ “Mr. Hester said when the Regional Plan and the Regional Transportation Plan were done they projected what the out of Basin growth would be and those figures were used as a baseline assumption. For near Basin projects we need to ensure that what they generate is within the assumptions we used or if they are not, the new impacts are addressed. When the out of Basin Environmental Impact Statements and Environmental Impact Reports are prepared they have not shown the level of detail on whether the assumptions comply...Projects or area plans environmental documents needs to have an analysis

suggested impacts from Squaw Valley had been considered, the most recent cumulative impact analyses (2012) included in the TMPO/TRPA RTP EIR/S and TRPA RPU EIS did not include Squaw Valley (see list of cumulative projects in the Lake Tahoe RTP/SCS Draft EIR/EIS, p. 4-5 to 4-8²⁶). The June 2016 draft EIR for the Tahoe Basin Area Plan also applies ‘adjustments’ to add traffic from the VSVSP and other projects to account for these impacts not being covered by TRPA’s previous analysis.²⁷

C. Assumptions used in VMT estimates:

Our comments on the DEIR questioned the data used to estimate the destination of trips in the Tahoe Basin (and therefore, the VMT). The only source for such assumptions presented in the DEIR appears to be the guest and employee surveys in the DEIR, which do not specify the destinations taken on all trips. We also presented recent information suggesting that a larger number of guests may potentially drive along Tahoe’s West Shore to visit Emerald Bay (as well as other in-Basin locations).²⁸

“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 Region¹⁷ 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:

comparing those to the Regional Plan and an analysis comparing the cumulative totals. The definition will start with all near Basin (resort triangle) projects and will be refined in the future...TRPA and Placer will [be] discussing for future environmental documents...how in Basin impacts from adjacent and very near to the Basin projects can affect internal assumptions and the environmental impacts within the Basin that need to be examined in that contexts.” (Excerpts from minutes for 10/28/2015 GB hearing at <http://www.trpa.org/wp-content/uploads/December-16-2015-Governing-Board-Packet.pdf>).

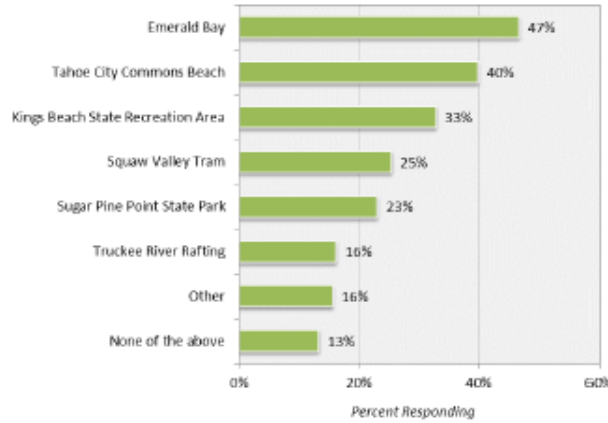
²⁶ http://tahoempo.org/rtp_draft/1_Regional_Transportation_Plan_EIS/04_Cumulative_RTP.pdf

²⁷ http://www.placer.ca.gov/~media/cdr/ecs/eir/tahoebasincp/deir/appendix%20g_transportation%20and%20circulation_revised%206_2.pdf?la=en

²⁸ Labeled as 03-11 in the FEIR, p. 3.2.4-106 to -107.

North Lake Tahoe Resort Association Visitor Research **Summer 2014**

Figure 7: Visited Attractions on Trip



• **Attractions.** Attendance at several different attractions was also queried on the survey. The most popular attraction was Emerald Bay, with 47 percent of survey respondents indicating spending time during their visit there. Somewhat less popular but still important drivers of the visitor experience were Tahoe City Commons Beach (40

percent) and Kings Beach (33 percent). Somewhat less popular were the Squaw Valley tram (25 percent), Sugar Pine Point state park (23 percent), and Truckee River Rafting (16 percent).

The FEIR response refers to the Master Response regarding traffic impacts in the Tahoe Basin, which then fails to respond to the question. The public has not been provided the information used to assess where guests and employees are expected to drive in the Lake Tahoe Basin. Although Appendix C provides estimates of locations and associated VMT, the assumptions used to generate the trip data are still not provided. As noted, the estimated guest trips into the Tahoe Basin, including on SR 89 along the West Shore, appear to significantly underestimate trips based on the information presented in the North Lake Tahoe Resort Association’s 2014 survey of traveler destinations.

Given the project is anticipated to contribute to cumulative traffic impacts in the Lake Tahoe Basin to a degree that will violate the VMT standard, it is reasonable to assume that the project will further contribute to the cumulative impacts of traffic from multiple regional projects and plans. The FEIR should fully disclose this impact.

IV. Inadequate Mitigation:

CEQA section § 21002.1 states: “(a) The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. (b) Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.” [Emphasis added].

While the FEIR makes references to the 2016 TART Systems Update Plan²⁹ (p. 32), the proposed mitigation provides no guarantees that transit service will be expanded to mitigate impacts, no performance measures that must be met by future mitigation, nor does proposed mitigation go far enough to further mitigate impacts. Instead, the applicant simply deems the impacts ‘significant and unavoidable’ and asks you to approve their project with ‘Overriding Considerations.’”

As noted in our comments on the DEIR, the mitigation measures are insufficient, and 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.”* (p. 14 in FOWS DEIR comments; labeled as comment O3-13 by FEIR).

A. Ridership capacity undefined:

Our comments labeled O3-13 express concerns regarding Mitigation Measure 9-7, which requires the applicant to pay a fair share toward transit funding - but only after ridership approaches capacity. However, “capacity” is not defined, nor is there any analysis of how, or if, this funding will actually mitigate project impacts. The FEIR acknowledges that this information will need to be further developed,³⁰ and states that the determination of the specifics of this mitigation will be done later in consultation with TART and Placer County Staff.³¹ However, this response defers mitigation and fails to provide the public with the detailed information necessary to assess the project impacts and future requirements. The public cannot possibly comment on details that are not provided in the first place.

B. Future transit service:

The FEIR fails to address the inadequacies in mitigation from transit service. In addition to the defects noted above, the response provided in the Master Response 3.1.2 includes other contradictory statements and insufficient information.

²⁹ “The annual funding is designated for the ongoing operational and maintenance costs for transit services outlined in the Tahoe Truckee Area Regional Transit Systems Plan and to pay the TART fares for Specific Plan employees.” (p. 32). April 6, 2016.

³⁰ “With regard to triggers that result in new transit service and what factors will be used to determine when ridership approaches capacity, it is acknowledged that this type of detail will need to be further developed; however, the DEIR includes commitments to meet the performance metrics to be established by TART.” (FEIR response to O3-13, p. 3.2.4-120).

³¹ “The comment indicates that mitigation for impacts to transit service should include monitoring and a definition of what it means for ridership to be at capacity. As described in the DEIR, pursuant to Mitigation Measure 9-7, the provisions for monitoring and determining the appropriate fair share or the steps for forming a CSA or CFD shall be determined prior to the recordation of the Initial Large Lot Final Map in consultation with, and to the satisfaction of, Tahoe Area Regional Transit (TART) and County staff.” (FEIR response to O3-12, p. 3.2.4-120).

- 1) The FEIR suggests that the VSVSP's anticipated fair share funding will cover just one additional inbound bus from Tahoe City and one from Truckee during a Saturday winter morning peak hour, estimated to reduce 37 trips.³² However, the FEIR does not disclose whether a reduction of 37 trips will provide sufficient mitigation for the project's impacts. During the summertime, the DEIR estimates almost 600 new trips may occur on a peak Friday in the summer (Table 9-19³³), however no performance standards or estimates are provided for how many trips will be reduced through transit improvements.
- 2) Oddly, even as the FEIR relies on improved transit service as one means to mitigate project impacts, the FEIR also suggests that enhanced transit service may not be an effective means to reduce auto use.³⁴ The FEIR also responds to our DEIR comments regarding the need to consider additional disincentives to personal automobile use by admitting, "*the VSVSP does not include any features that would directly dis-incentivize private automobile use in the region.*" (FEIR, p. 3.2.4-120). Even as this impact is recognized as significant and unavoidable in the FEIR, no consideration of such disincentives that may provide additional mitigation options is provided. Further, there is no evaluation of what types of transit improvements would improve ridership, such as reduced wait times, different/additional locations, lower fees, etc.

Measures involving targeted improvements to transit service³⁵ combined with disincentives to personal automobile use provide two clear examples of additional mitigation measures that the project could incorporate to help mitigate traffic impacts. In addition, the EIR needs to include performance standards upon which mitigation measures can be monitored and assessed. We herein incorporate detailed comments regarding mitigation from the League to Save Lake Tahoe, Sierra Watch, Mountain Area Preservation, and the Friends of Squaw Valley.

In summary, the EIR contains deferred mitigation in the form of additional transit service that will be determined later (outside of the EIR's public process), with suggestions that such mitigation may reduce just a small portion of the additional peak hourly trips in the winter, followed by references to a study that indicate such transit increases may not, alone, be effective to mitigate traffic impacts. The EIR also ignores additional mitigation measures that

³² "One evaluation of the VSVSP's anticipated fair share funding contribution indicates that it would be sufficient to provide one additional inbound bus arriving from Tahoe City and one additional bus arriving from Truckee during the Saturday Winter AM peak hour (with a comparable reverse afternoon trip). It is estimated, based on a review by the EIR traffic engineer, that this would result in the removal of 37 peak hour, peak-direction project-related vehicle trips that would otherwise drive to the Village (based on the bus capacity, and average vehicle occupancies of employees and skiers)." (FEIR, p. 3-27)

³³ "Table 9-19 displays the number of new vehicle trips generated by the proposed project during the summer Friday p.m. peak hour. As shown, the project would generate approximately 590 trips during this peak hour." (DEIR, p. 9-42).

³⁴ "As a result, skiers with ready access to a private vehicle have little incentive (in terms of monetary or time savings) to use a transit service, given the time needed to wait for the bus or use a park-and-ride. ...Overall, however, the results of this experimental service indicate that simply providing enhance transit service to park-and-ride locations in the North Tahoe/Truckee region is not an effective means of reducing auto use." (FEIR, p. 3-27 and 3-28).

³⁵ Which have been well outlined in the TART 2016 Systems Update Report.

are available even as it concludes significant and ‘unavoidable’ impacts. Clearly this defeats CEQA’s requirements for an EIR to inform the public and to include all feasible mitigation measures – especially where impacts have been determined to be significant and unavoidable.

V. Conclusion:

It appears that rather than address the DEIR’s technical insufficiencies and evaluate all available mitigation measures, the developers aim to wash their hands of the impacts by simply reasserting the (inadequate/undefined) “mitigation measures” provided in the DEIR and then stating that more can’t be done, thereby leaving it to the you and the Board of Supervisors to decide if the traffic impacts are worth the project’s purported benefits. We do not believe Lake Tahoe owes the applicant a profit at the Lake’s expense, nor should public safety be further compromised for the applicant’s bottom line.

We ask you to deny this project as proposed, and ensure that if/when a revised alternative is provided, a smaller-sized project is considered, and adequate analyses of impacts and requirements to employ all feasible mitigation options are incorporated