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October 25, 2017

**Subject: Draft Environmental Impact Report (DEIR) for Alpine Sierra Subdivision**

Dear Mr. Fisch:

The Friends of the West Shore appreciates this opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the Alpine Sierra Subdivision.

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. We are concerned with the extent of proposed development along the West Shore, North Shore, and areas bordering the Lake Tahoe Basin (such as Alpine Meadows), and the cumulative impacts of these multiple projects on our communities and environment, which include increased Vehicle Miles Traveled (VMT) in the Basin, increased water and air pollution, noise, and other adverse impacts associated with increasing visitor and resident populations, both in the Basin and surrounding areas. The attached comments are provided to assist with development of the Final EIR for the proposed project. In summary:

- The DEIR fails to analyze the proposed project's impacts to Lake Tahoe Basin associated with additional vehicle use within the Basin;
- The assumptions in the DEIR's traffic analysis are not supported and must be revised to accurately analyze and disclose potential project impacts;
- The DEIR underestimates the potential traffic impacts to State Route 89, resulting in a failure to consider the project's potential impacts to the main emergency access route for west and north shore communities; and
- The DEIR fails to include the cumulative impacts from approved plans and projects in the region.

We hope these comments will assist Placer County with the development of a comprehensive, technically-adequate Final EIR that includes adequate mitigation for the proposed project's impacts to the Lake Tahoe Basin and public health and safety. Please feel free to contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) if you have any questions.

Sincerely,

Susan Gearhart,  
*President*

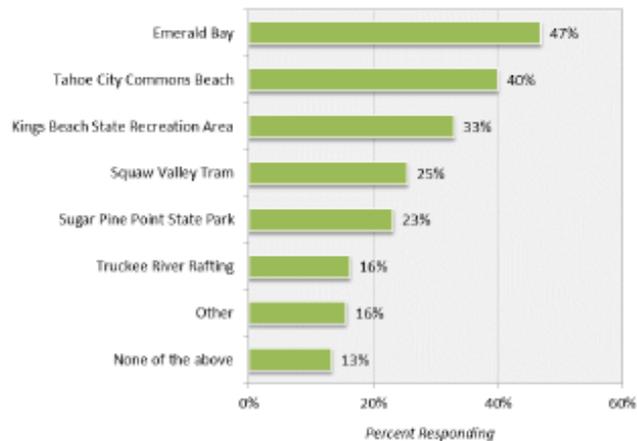
Jennifer Quashnick,  
*Conservation Consultant*

## A. Traffic impacts to the Lake Tahoe Basin:

In our NOP comments, we requested the project's traffic impacts on the Lake Tahoe Basin be analyzed.<sup>1</sup> However, the DEIR fails to address the project's impacts to the Lake Tahoe Basin. Further, as noted in the sections below, the project's total traffic (a portion of which will impact Lake Tahoe) has been underestimated.

Whether new occupants are full time residents, part-time residents, or visitors, they will make vehicle trips into the Tahoe Basin at some point. Further, given the popularity of vacation rentals, it is reasonable to expect the project to bring a variety of visitors to the area (versus just being used by the same owners on weekends, for example). New visitors are more likely to drive to see Lake Tahoe (and popular areas like Emerald Bay) during their trip. The impacts of these trips into the Lake Tahoe Basin have not been analyzed.

**Figure 7: Visited Attractions on Trip**



As illustrated in Figure 7 above from North Lake Tahoe Resort Association visitor Research,<sup>2</sup> a recent survey of visitors throughout the Tahoe/Truckee/Squaw Valley Region<sup>3</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). As the survey shows, more visits were made to locations *within the Tahoe Basin* than elsewhere.

***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 vehicle trips and VMT generated within the Lake Tahoe Basin associated with maximum visitor use of the homes.***

<sup>1</sup> 5/8/2014 FOWS comments: “The NOP only notes traffic studies will be completed for intersections outside of the Lake Tahoe Basin (p. 19-20), however, new residents and visitors to Alpine Meadows are likely to drive into the Basin at some point (or regularly), affecting intersections in Tahoe City and south on S.R. 89 along the West Shore. Lake Tahoe Basin VMT, congestion, air pollution, water pollution, noise, and other cumulative impacts must be adequately analyzed in the EIR.” (p. 2)

<sup>2</sup> <http://nltra.org/documents/pdfs/RRC%20Summary%20NLTRA%20Summer%202014.pdf>

<sup>3</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).

## **B. Overall traffic analysis:**

### **1. Trip generation by land use type:**

The DEIR underestimates potential daily trip generation by relying on a “Recreation home” land use to calculate trips for approximately half of the new units, which the DEIR recognizes as having “relatively low” traffic generation rates.<sup>4</sup> As noted on p. 8, the trip generation rate for a single family home is 2.5 times the rate for a recreation home (0.75 versus 0.30, resp.).<sup>5</sup> In fact, trip generation rates for recreation homes are the lowest among all other uses in the table.

*Unless Placer County will limit the use of the new homes such that 75% can only be used for recreation (to match the DEIR’s assumption<sup>6</sup>), the FEIR must analyze the impacts from the potential maximum use of the new units by using the highest trip generation rate that may apply (to all new single family primary residences, vacation homes, and duplex units). In this case, the FEIR needs to analyze impacts that could occur if the single family residential rate is applied to all such new units.*

### **2. Trip generation during peak periods of visitation:**

The DEIR does not address the maximum capacity of the project during peak visitation periods (e.g. weekends and Holidays). For example:

- The ITE rates are not stated to be for such peak periods, nor do they address the size, and therefore capacity, of units.
- The significant traffic problems now experienced in the region on most winter and summer weekends and Holidays are not in question.
- The popularity of vacation rentals (through services such as VRBO), and the tendency to pack large groups of people into such rentals, are also well understood.

Therefore, unless restrictions are placed on the home’s use and/or maximum occupancy, there is the potential for the new units to be rented to a significant number of visitors during these already-congested periods, thereby worsening traffic problems during peak periods. However, the DEIR does not address this impact. We herein incorporate the comments submitted by Sierra Watch on the Village at Squaw Valley Specific Plan regarding peak occupancy rates of homes in the area as they also apply to this DEIR analysis.<sup>7</sup>

Unless Placer County will prohibit the new homes from being used as vacation rentals and/or place limits on maximum per-unit capacity, the FEIR must also analyze the

<sup>4</sup> “...the relatively low “Recreational Homes” trip generation rates...” (App. E, p. 7)

<sup>5</sup> TABLE 1: Alpine Sierra Subdivision Trip Generation

<sup>6</sup> “Therefore, about 75 percent of the proposed detached units on the project site are assumed to be vacation homes (recreation homes).” (App. E, p. 7)

<sup>7</sup> 7/16/2015 Sierra Watch comments on Village at Squaw Valley Specific Plan draft EIR, submitted by Shute, Mihaly, and Weinberger, LLP.

potential impacts of visitor use during peak periods to ensure full disclosure of potential environmental impacts and provide adequate mitigation.

***In order to ensure adequate environmental analysis as required by CEQA, the FEIR needs to analyze the potential traffic impacts associated with the maximum capacity of the project during peak periods (e.g. weekends, Holidays).***

### **3. Number of bedrooms versus units:**

The DEIR also bases future cumulative traffic estimates on a simplistic assumption that traffic generated by each new unit will be the same as traffic generated by each existing unit.<sup>8</sup> This fails to consider the size of the new units and how many bedrooms are included (which affects how many people may be vacationing in each unit and therefore driving on affected roadways).

***The FEIR must present such details to support this assumption, otherwise the analysis must be revised to reflect the number of trips associated with the size of units (for example, trips per bedroom would be more appropriate than per housing unit).***

### **4. Cumulative impacts:**

The DEIR relies on a 2012 Caltrans report and general growth rate from that document to analyze the cumulative impacts to State Route 89.<sup>9</sup> However, this does not appear to incorporate the cumulative traffic impacts associated with the Village at Squaw Valley Specific Plan (VSVSP),<sup>10</sup> Tahoe Basin Area Plan (TBAP),<sup>11</sup> the proposed Alpine Meadows to Squaw Valley Gondola<sup>12</sup> (which may increase traffic in the study area in the short- and long-term due to construction and increased resort visitation), proposed White Wolf Subdivision,<sup>13</sup> and other approved plans and projects that will increase traffic on Alpine Meadows Road, SR 89, and in the Tahoe Basin. In addition, the DEIR relies on the 2014 base year for its analysis.<sup>14</sup> However, traffic in the region substantially increased

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<sup>8</sup> "...the projected increase in housing units is used as the basis for estimating future traffic volumes along Alpine Meadows Road." (App. E, p. 13)

<sup>9</sup> "Future cumulative (20-year horizon) traffic volume projections for SR 89 in the study area are provided in the *SR 89 Transportation Corridor Concept Report* (Caltrans, 2012). Based on a comparison of the 2010 and 2030 traffic volumes provided in that report, the average growth rate is estimated to be approximately 0.92 percent per year. This rate is applied to the existing peak-hour volumes on SR 89 in order to estimate the future cumulative volumes." (App. E, p. 13)

<sup>10</sup> VSVSP DEIR, Chapter 18, Other CEQA Sections:

[http://www.placer.ca.gov/~media/cdr/ecs/eir/vsvsp/deir/18\\_vsvsp\\_deir\\_otherceqa.pdf?la=en](http://www.placer.ca.gov/~media/cdr/ecs/eir/vsvsp/deir/18_vsvsp_deir_otherceqa.pdf?la=en)

<sup>11</sup> TBAP and Tahoe City Lodge DEIR/S, Chapter 19, Cumulative Impacts:

[http://www.trpa.org/wp-content/uploads/19\\_Cumulative.pdf](http://www.trpa.org/wp-content/uploads/19_Cumulative.pdf)

<sup>12</sup>

<https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/squawvalleygondolaproject>

<sup>13</sup> Project proposes: "38 single-family residential lots (.5-acre to 1.5-acre in size); 10,360 sf clubhouse/lodge, ski resort facilities, warming hut, and ski lift on approximately 74 acres of a 460-acre property owned by applicant." October 2017 Placer County Active Projects List, p. 21. [http://www.placer.ca.gov/~media/cdr/ecs/currentprojects/2017/1017%20october%20ceqa\\_alpha.pdf?la=en](http://www.placer.ca.gov/~media/cdr/ecs/currentprojects/2017/1017%20october%20ceqa_alpha.pdf?la=en)

<sup>14</sup> App. E, p. 4

from 2015 to 2017;<sup>15</sup> this increase must be accounted for in the cumulative impacts analysis.

***The FEIR needs to incorporate the traffic impacts from other projects and plans in the region into the cumulative impacts analysis.***

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<sup>15</sup> E.g. <http://www.sacbee.com/news/local/transportation/article149574509.html>;  
<http://tahoequarterly.com/best-of-tahoe-2017/seeking-traffic-solutions-tahoe>