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## **Report on Comment Letters Draft Environmental Impact Report Squaw Valley Village Specific Plan**

October 14, 2015

### **Introduction**

Proposed development is raising big questions about the future of Squaw Valley. KSL Capital Partners' *Village at Squaw Valley Specific Plan* would remake the region with development of a size, scale, and scope North Tahoe has never seen.

Placer County issued a Draft Environmental Impact Report (EIR) for the project in May 2015. In response, 338 comment letters were submitted by local jurisdictions, regulatory agencies, private organizations, and citizens to Placer County. This report captures key content and seeks to summarize those comments.

The consensus of the comments is clear: an overwhelming majority of letter writers – 97% – oppose approval of the project and/or express serious concerns about the sufficiency of the environmental analysis. Together, they communicate a combined message to Placer County:

- 1) The project is too big for Squaw, and it threatens key Tahoe values.
- 2) The EIR is inadequate under state law, and approvals of the project would be illegal.

### **Background**

KSL Capital Partners, a private equity firm based in Denver, Colorado, purchased Squaw Valley in 2010 and filed an initial application for development entitlements with Placer County in 2011.

In May of 2015, Placer County released the final version of KSL's *Village at Squaw Valley Specific Plan*. The proposed project would include a series of condo/hotels, many

of which would be more than 100 feet tall; more than 1,500 new bedrooms; time-share units; and nearly 300,000 square feet of commercial uses, including an indoor water park, on roughly 94 acres. All told, the project would take 25 years to complete.

The California Environmental Quality Act (CEQA) requires thorough environmental review of large development proposals and ensures opportunities for public involvement in the planning process.

An EIR ensures that decision-makers, in this case the Placer County Board of Supervisors, are fully informed of the wide-ranging impacts of a project approval. An EIR also provides an iterative process through which they can accept and understand public reaction to a proposed project. According to case law, the EIR is "the heart of CEQA".

The primary method of communicating that reaction is through comment letters on a Draft EIR. The 2,000-page Draft EIR (DEIR) for the *Village at Squaw Valley Specific Plan* generated 338 letters. Placer County grouped those letters into three categories:

1. Comments from Agencies and Jurisdictions;
2. Comment Letters from Organizations and Non-Profits;
3. and Comment Letters from Individual Citizens.

### **Comments from Agencies and Jurisdictions**

Placer County maintains land use decision-making authority in Squaw Valley. But other local jurisdictions and regulatory agencies have their own responsibilities, policies, and interests – many of which could be impacted by the proposed development. Local water agencies must look out for the safety and security of their supplies; fire departments need to ensure safe evacuation routes; federal regulators are responsible for the health of our wetlands and waterways.

Fourteen local jurisdictions and regulatory agencies submitted comments on the Squaw Valley Draft EIR. All expressed either outright opposition or deep reservations about the Draft EIR's adequacy and about the project itself. For example:

1. *CalTrans* expressed concern about traffic, not only in Squaw Valley but in Tahoe City and Truckee as well, pointing out that, "the increase in traffic volumes in this area due to this development will increase congestion at peak times."
2. The *Squaw Valley Mutual Water Company*, a local utility providing water to hundreds of Squaw Valley homes, called the DEIR's assessment of local water supplies, "fundamentally flawed".

3. The *California Highway Patrol* pointed out that the project would increase its response times during emergencies, writing "we have concerns with this project."
4. The *Lahontan Regional Water Quality Control Board*, the state regulatory agency responsible for water quality in the area, is concerned that the project would lead to groundwater extraction that "could dewater Squaw Creek".
5. The *United States Forest Service* wrote that it is "very concerned with the potential impacts to the Granite Chief Wilderness, especially to the Five Lakes Basin and to the Pacific Crest National Scenic Trail", including "significant impacts to National Forest recreational experiences as well as wilderness character."
6. The *Town of Truckee* raised concerns about how the proposed development would increase pressure to import water from Martis Valley, pointing out that the "Squaw Valley Public Services District has stated a desire to acquire a backup water source for Olympic Valley, identifying the Martis Valley aquifer as a potential source. The build out of the Squaw Valley Specific Plan will likely increase the need for this backup source."

More comments from agencies and jurisdictions can be found, grouped by issue, below.

### **Comment Letters from Organizations and Non-Profits**

Fifteen private organizations, ranging from local homeowners' associations to international non-profits, submitted comments on the *Village at Squaw Valley Specific Plan* Draft EIR. Each expressed either some level of opposition to the project or requested additional work to ensure adequacy of environmental review.

Chief among them, the 139- page letter from Sierra Watch is based on thorough review of the Draft EIR by a team of experts in hydrology, traffic, wildlife biology, and law. Its findings are clear:

- The DEIR "fails to fully convey the magnitude of this massive project and the extent to which it would threaten the irreplaceable values of Squaw and Tahoe – fresh air, starry skies, the natural world, mountain streams, scenic vistas, outdoor recreation – and replace them with highrise condos, traffic gridlock, and noise;" approvals would therefore be illegal.

Sierra Watch's sweeping letter is bolstered by comments from other organizations: For example:

- The *League to Save Lake Tahoe*, known for its work to Keep Tahoe Blue, wrote that the "consequences to the Lake Tahoe Basin were disregarded in the DEIR."
- Truckee-based *Mountain Area Preservation* called the Draft EIR's treatment of the project's potential impacts on climate change "appalling".
- The *Center for Biological Diversity* wrote that information in the Draft EIR was "confusing, contradictory, or misleading."
- *Tahoe Residents United for Sustainable Squaw Tourism* (TRUSST) reached the same conclusion, "After reviewing the DEIR, together with our team of expert consultants, it is evident that the document contains numerous errors and omissions that preclude accurate analysis of the Project."

More comments from private organizations can be found, grouped by issue, below.

### **Comment Letters from Individual Citizens**

Most of the letters – 309 – sent to Placer County came from individual citizens. Seven offered support of the proposed development; three were essentially neutral; 299 – more than 96% – expressed clear opposition.

Generally less technical than the comments submitted by agencies, jurisdictions, and organizations, the letters sent in by private individuals demonstrate a deep appreciation for Squaw Valley and overwhelming opposition to the proposed development.

Individuals, most of them local, some from other states, were less likely to make arguments based in scientific expertise or state planning law. They, generally, spoke from the heart.

Maybe most important, the letters point out what's stake – by spelling out the immeasurable value of Squaw Valley and its natural setting as a:

- "unique and special place" (*Daniel Day*);
- a "gorgeous, unique and treasured area of California" (*Catherine S. Faust*);
- a "beautiful, fragile valley environment" (*Judy Layton*); with
- "clean air, clean water, quiet times and the ability to see the stars at night" (*Thomas P. Fralick*); and
- "natural beauty" (*Kyle and Susan Weaver*); that is
- "rustic, beautiful beyond words" (*Melissa Burroughs*), and
- "one of the Grand Natural Cathedrals of the Sierra" (*Dane Shannon*).

Commenters expressed concern that those values are at risk from a proposed development they describe as:

- "terrible" (*Peter M. Callahan*);
- "overwhelmingly inappropriate" (*Park Loughlin*);
- "outrageous" (*Denise and Richard Wall*);
- "mind-boggling" (*Dr. and Mrs. Richard W. Terry*);
- "monstrous" (*Greg Archbald*);
- "soulless" (*Alex Espinoza*); and
- "disastrous" (*Deb Echenique*); and as
- a "catastrophe" (*Richard and Marcy Terry*); and
- "logistical nightmare" (*Terry R. Baker*).

For many individuals, the commitment to Squaw Valley is generational in nature; people appreciate the values that have been passed down from previous generations and want to share it with generations to come. For example:

- *Harold and Cecile Weaver* wrote, "We have enjoyed our Squaw Valley home for many years and now our children, grand children and great grandchildren, come to hike, enjoy the mountain air, the sunsets, ski in winter and get away from the hustle and bustle of the city. KSL may have bought some land, but they do not have right to destroy an alpine area that can never be replaced."
- *Ed Natrass* of Carnelian Bay pointed out that he is 73 years old "and will probably not be around to see the completion of such a travesty, but would like my children and grandchildren to enjoy a beautiful valley, not a Sierra Disneyland."
- *Catherine S. Faust* of Piedmont wrote, on behalf of her family "who has enjoyed this unique and treasured area of California for many years, I cannot condone this loud, urbanized plan, which would negatively transform Squaw Valley for generations to come."
- *Gerald Gates* urged Placer County, "Please do not forfeit your grandchildren's right to experience these natural wonders."
- *Brady T. Larsen* of Pleasant Hill wrote to say he wishes "to be able to share the same memories with our own children and for them to do that with theirs. The planned projects for expansion will irrevocably ruin Tahoe as we know it and have ecological impacts that will make it impossible for future generations to enjoy this natural wonder."

Many commenters made clear requests of Placer County decision-makers. For example:

- *Thomas P. Fralick* of Homewood urged, "Placer County please do not take this all away from us."

- *Greg Archbald* wrote that "The County of Placer could help make the whole drama a lot less painful for all concerned by making it clear, right now, that nothing of the sort proposed by KSL is remotely possible."
- *Robert Schladale and Lois Williams* of Auburn, California wrote, "Placer County would do both KSL Partners and its citizens a favor by rejecting this proposal outright."

The clear consensus and deep opposition expressed by the individual comment letters might best be summed up with an excerpt from the letter submitted by *Kirk and Jacqueline Weaver* of Houston Texas, Squaw Valley property owners who have been gathering family to enjoy the mountains for more than 40 years:

- "The KSL proposal reflects a mountain monstrosity, inconsistent with the aesthetic, historic, human and current commercial values of Squaw Valley...In short, the KSL Development Proposal seeks to convert a world class mountain destination into an amusement park. We don't need it and we don't want it...For us, the KSL Proposal will destroy the things that have made Squaw Valley special – the dark sky and bright stars on a winter's night, the sound of snow falling in the winter, the pine-scented breezes, the small-community environment, among many other things. So, we strongly oppose the KSL Proposal, and urge you to reject it."

### **Excerpts from Comments Regarding Specific Issues**

A development proposal of the size and scope of KSL's *Village at Squaw Valley Specific Plan* would have major impacts on a wide range of issues over a long period of time. Comment letters covered a vast array of concerns, from the from the time it takes an ambulance to respond to an emergency to how many stars a kid can see in the night sky.

### **Traffic**

Traffic is already an important issue in Squaw Valley and throughout the North Tahoe region. Agencies, organizations, and individuals all expressed concern for how the proposed development would guarantee gridlock:

- *Caltrans* criticized the analysis in the Draft EIR, writing "Not all peak hours have been evaluated. For example, congestion from Squaw Valley to Tahoe City was not analyzed for winter weekend impacts. Some discussion of this peak hour, along with discussion of any other peak hours that have not been analyzed for...as well as some discussion of the Tahoe City Fanny Bridge Revitalization project should also be provided;" and pointing out that, "In summary the increase in traffic volumes in this area due to this development will increase congestion at peak times."

- The *Squaw Valley Fire Department* expressed concern about Squaw's overcrowded roads: "A vague promise to manage parking 'in an efficient and safe manner' is an entirely unacceptable answer to an issue that affects not only the vast majority of guests to Squaw Valley, but virtually every resident in the region (and has a significant effect on public safety.)"
- The *Town of Truckee* pointed out that traffic on Highway 89 is already "unacceptable" and could be made worse by the proposed development. Truckee urged Placer County to "consider reduced development alternatives which would result in lower traffic impacts."
- *Sierra Watch* pointed out that "the DEIR fails to adequately analyze the Project's impact on summer traffic, containing no analysis of summer daily traffic – despite the DEIR's assertion that the Project is expected to generate three times more peak-day traffic in the summer (8,410 new daily trips) than in the winter (2,821 new daily trips);"
- *Sierra Watch* also wrote that the DEIR's traffic analysis "grossly underestimates the number of car trips the Project would generate. For example, even though the DEIR estimates that 1,200 guests would likely visit the proposed amusement park every day, the document asserts that this attraction would generate only 58 car trips per day."
- And *Sierra Watch* pointed out that the Draft EIR "underestimates the Project's traffic impacts because it dismisses impacts on Interstate 80 even though, if approved, the Project would routinely add more than 4,000 new daily car trips to I-80 and its ramps."
- *Friends of the West Shore* expressed concern that the proposed development would make Tahoe traffic worse, pointing out that, "as noted in the Tahoe City Mobility Plan, the roadway segment through Tahoe City currently operates at LOS F (gridlock) during peak summer periods."
- *Friends of Squaw Valley* disparaged the baseline data used in the Draft EIR's traffic analysis, pointing out that, "The day chosen for the peak hour was Saturday, February 18, 2012. Yet, on February 7, 2012 instead of the normal average 69" snowpack, there was a 12" snowpack... It is clear that the DEIR traffic study is not representative of an average Squaw Valley winter."
- *Terry R Baker of Truckee* shared his experience with local traffic, "Current traffic is backed up routinely to Truckee on Hwy. 89. The parking lot is filled by early morning on holidays and peak weekends, resulting with parking along Squaw

Valley Road. These conditions result in compounding a bad problem to chaos. I do not understand how the planners for this logistical nightmare can say there will be no problem by adding more people and cars into an already nightmarish situation."

### **Water Supply**

The availability of an adequate water supply is of heightened concern during this time of unprecedented drought. Many comment letters included detailed expertise to point to flaws in the Draft EIR's assessment of how the project would impact water supplies.

- The local *Squaw Valley Mutual Water Company* disparaged the Draft EIR because it "relies centrally and repeatedly upon a fundamentally flawed Water Supply Assessment ( WSA)" that "produces an overly optimistic portrayal of available water resources, for the project and a failure to fully account for the project's water-related impacts", thereby downplaying "the project's adverse water consequences."
- The primary local water provider, the *Squaw Valley Public Service District*, expressed concern for the future of the valley's wells, writing "Dense development of the land overlying the aquifer poses unique risks to the District's ability to access the aquifer to rehabilitate and replace existing and proposed production wells."
- *Sierra Watch* engaged an expert hydrologist to review the Draft EIR, its Water Supply Assessment, and additional data, concluding that the Draft EIR " misleads the public with false annual precipitation data... The DEIR estimates average precipitation at 263 inches per year in snow-melt equivalent in Squaw Valley; the actual amount is only 80.6 inches per year – less than a third of what the DEIR claims. ;" it "overestimates existing supplies and underestimates likely demand;"
- Many letters echoed *Sierra Watch's* point that the Draft EIR "makes almost no mention of the current drought – or future droughts; instead it relies, incredibly, on precipitation data through only 2011. And it dismisses impacts of future drought by claiming, despite overwhelming contradictory scientific evidence, that drought events "are expected to be limited."
- The *Town of Truckee* reminded Placer County that the primary water provider in Squaw Valley seeks to import water from another watershed, Martis Valley, in order to service development in Squaw, "Squaw Valley Public Services District has stated a desire to acquire a backup water source for Olympic Valley, identifying the Martis Valley aquifer as a potential source. The build out of the Squaw Valley Specific Plan will likely increase the need for this backup source. Town of Truckee citizens, through the Truckee Donner Public Utility District,

receive their water from the Martis Valley aquifer. Additional demand placed on this aquifer could have regional water impacts, and should be studied as part of the review of the specific plan.”

- *Tahoe Residents United for Sustainable Squaw Tourism (TRUSST)* slammed the Draft EIR for failing "to incorporate data into the groundwater model from ongoing drought and severe ' megadroughts';" pointing out that "failure to model droughts places the reliability of the model as a tool for decision-making about a sustainable Project water supply into serious doubt."
- And *Kevin Starr* wrote, "I'd like to know how KSL plans to source the water needed for the project as a whole (water park, population increase) without stealing it from the Martis Valley watershed."

### **Water Quality/Watersheds**

Water is not only important in terms of its availability for human consumption; water quality and the health of local watersheds are fundamental to the natural health of our Sierra Nevada. Many comment letters, however, pointed out the Draft EIR downplayed the project's direct impacts on surface water quality and quantity, notably the impact of drawing water from Squaw Creek and how that would affect the health of wildlife habitat and the Truckee River watershed. For example:

- The *Lahontan Regional Water Quality Control Board (LRWQCB)*, the state agency responsible for regulating water quality, was clear in its opinion of the Draft EIR, “Water Board staff disagrees with the current DEIR assessment. Improper management of groundwater extraction could dewater Squaw Creek, adversely affecting riparian vegetation resulting in increased creek erosion, increased creek temperatures, decreased aquatic and terrestrial wildlife habitat. It is unclear how the stated mitigation measures will prevent or reduce these impacts to levels that are not potentially significant.”
- *LRWQCB* also expressed concern for inadequate wetland mapping and delineation, writing “The failure to complete the wetlands delineations and the constraints maps for the entire project site prevents even a preliminary analysis and disclosure of environmental impacts associated with wetlands, 100-year floodplains, and riparian areas.”
- And *LRWQCB* pointed to "insufficient information about water quality protection measures" from potential damage from construction, writing that “no details or explanation regarding how potentially significant effects to water quality associated with constructing a replacement sewer line across Squaw Creek and the

Truckee River will be avoided, minimized, or mitigated are discussed in the DEIR.”

- *Richard Anderson, Supervisor 5th District of Nevada County*, wrote in defense of the broader Truckee River watershed, "Although the VSVSP DEIR discusses the project's potential negative impact to Squaw Creek's aquatic habitat and trout, it largely ignores the Truckee River, to which Squaw Creek is a notable tributary."
- *Sierra Watch* pointed to inadequate review of the potential impact on Squaw Creek and, also, the role the state of California could play in asserting jurisdiction over local water rights, "The DEIR fails to reveal the extent that the groundwater in the Basin is connected to Squaw Creek or that it flows in a subterranean stream. The use of surface waters and subterranean streams require water rights within the purview of the State Water Resources Control Board. Should the state assert their jurisdiction over the water in Squaw Valley, the applicant would need to 'get in line' for a water rights permit; the project would not be guaranteed access to the water it would need."
- *Center for Biological Diversity* seconded concerns regarding draw down of local water resources, "This DEIR does not sufficiently describe or analyze the Project's expected water extraction activities. Some of the information offered is confusing, contradictory, or misleading... Neither the DEIR nor the WSA describe in sufficient detail how the fractured bedrock groundwater is replenished, or how this replenishment may be affected by the current or future drought, or by climate change."
- The *United States Army Corps of Engineers* seeks to protect the integrity of "jurisdictional wetlands and other waters". In their letter, they ask for a revised "wetland delineation map"; a broader range of alternatives. And the letter reminds Placer County that "the Corps must balance the project purpose against the public interest" and that "no DA (Development Agreement) permit can be granted if the project is found to be contrary to the public interest."
- *CalTrans* expressed concern for how diminished water quality to harm its infrastructure, "anticipated runoff discharge rates, volumes and distribution of flows within the Village...resulting from the proposed improvements under this project must be quantified to determine potential impacts on the discharges that cross beneath...Squaw Creek Bridge and the other 3 highway drainage facilities.”

## **Wildlife**

Squaw Valley provides important habitat to a wide range of animal and plant species. Many comment letters pointed out inadequacies of the Draft EIR's analysis of impacts on

on biological resources. For example:

- The *Center for Biological Diversity* wrote in defense of the Sierra Nevada Yellow Legged Frog (SNYLF), an endangered species, pointing out that "the portion of the Project site within the SNYLF's proposed critical habitat is an area that the FWS identifies as 'essential for the conservation of the species';" but that "Lacking reliable information about SNYLF presence on the Project site, it is impossible for the public or decision-makers to assess the impacts of the Project on the species and determine if the proposed mitigation measures are appropriate or sufficient to protect the endangered frog and its critical habitat."
- *Sierra Watch* conveyed a similar conclusion, writing that the Draft EIR's "analysis of impacts on the endangered Sierra Nevada Yellow-legged Frog and its habitat is inadequate. The Project is within proposed critical habitat of the Sierra Nevada Yellow-legged Frog, which is listed as endangered under the federal Endangered Species Act. The DEIR recognizes this fact and discloses that the Project's construction may kill or injure individual frogs and result in the loss of its habitat. But its analysis is deficient because it fails to quantify the amount of habitat that may be lost; nor does it provide mitigation for the loss of frog habitat."
- *Sierra Watch* also pointed to ways that the insufficient analysis of hydrological impacts downplayed the project's potential effect on wildlife, writing that the Draft EIR "fails to adequately analyze and mitigate the project's impact on riparian areas and in-stream water flows. For example, it fails to analyze the impacts on any sensitive habitat more than just 12 inches from Squaw Creek. And it ignores or downplays the fact that increased groundwater pumping would draw down water levels in Squaw Creek" and that its "flawed hydrological assessment minimizes the impacts to plants, fish, and wildlife that depend on a high water table to feed pools, meadows, and shallow root systems during the dry summer months."

### **Public Safety**

Environmental review touches on important issues of public safety. However, according to the comment letters, the Draft EIR for the *Village at Squaw Valley Specific Plan* falls short:

- The *California Highway Patrol* summarized, "After review, we have concerns with this project," pointing to more crowds and increased congestion. "These impacts and an increase to congestion increase emergency response times for first responders including CHP Truckee Area personnel."
- *Sierra Watch* expressed similar concern, noting that the Draft EIR "largely ignores the Project's effects on emergency access even though, if approved, the

Project would choke numerous highways in the area with Level of Service 'F' – gridlock."

- And *Sierra Watch* pointed to the Draft EIR's failure to "properly analyze the Project's role in exacerbating the risk and impacts of catastrophic wildfire, avoiding adequate discussion of the challenges of evacuating an area with only one egress that would, if the project were approved, suffer gridlock under normal circumstances. It simply kicks the can of emergency evacuation further down the road, claiming that "the Placer County Department of Public Works would be involved in implementing measures to ensure acceptable traffic flow and reduce the risk of impairment to emergency evacuation routes."
- Local residents pointed to the potential risk from the project's dependence on propane. *Judy Carini*, for example, wrote that the Draft EIR "did not adequately address the impacts from the proposed placement of 6 30,000 gallon propane tanks at the proposed Heavy Commercial location. Every lot in the Specific Plan will need propane, requiring a massive network of piping, with numerous connections, elbows, etc. This will create a high likelihood that leaks will develop. The leaks will not only contaminate the aquifer and Squaw Creek, but could potentially cause a massive propane explosion. This is a threat to the immediate area and the entire Valley should a leak develop either at the tank site or somewhere along the pipeline."

### **Sewage Capacity**

In addition to concerns about water and transportation infrastructure, there is not enough capacity to handle sewage that the project would generate:

- The *Tahoe Truckee Sanitation Agency* pointed out that they do "not currently have capacity in the Truckee River Interceptor to serve both existing customers and the expected wastewater flows generated by the proposed project during peak wet weather flow periods."

### **Workforce Housing**

Big residential development projects should play a positive role in providing workforce housing. The proposed *Village at Squaw Valley Specific Plan*, however, would exacerbate the region's ongoing affordable housing crisis.

- *Richard Anderson, Supervisor 5th District of Nevada County*, asked that the County "realistically evaluate how the project-related workforce will be adequate and affordably housed. Having hundreds of service-wage employees compete for

affordable housing in a supply-constrained region would seem a situation that will lead only to heartbreak.”

- The *Town of Truckee* pointed out that, according to the Draft EIR, the project's "employee housing would only accommodate 27% of the new peak winter employees"; and that “The town continues to be concerned with this project, and reiterates that a clear and implementable workforce housing plan must be developed and analyzed concurrent with the Specific Plan.”
- *Mountain Area Preservation* agreed, "The Squaw Valley Specific Plan fails to sufficiently propose adequate development of workforce housing for the proposed development project;" and that the project would "likely push the employee housing burden onto adjacent communities such as Truckee and North Lake Tahoe, which currently have a very limited stock of affordable or market rate rentals available for the local workforce."

### **Climate Change**

Climate change is an issue of global importance and, also, state law. But, according to numerous comments, the Draft EIR failed to adequately evaluate the proposed Village at Squaw Valley Specific Plan's contribution to climate change. For example:

- *Sierra Watch* pointed out that the Draft EIR's "emission estimates are dramatically reduced by underestimating auto emissions from Project-generated vehicle trips and completely ignoring increased air travel."
- *Center for Biological Diversity* reached a similar conclusion, writing that the Draft EIR's analysis was flawed because, "rather than calculating the emissions impact by taking into account a greater number of annual vehicle trips as a result of the Project, the GHG emissions model assumed that the total number of annual vehicle trips would be the same before and after completion of the Project."
- *Sierra Watch* also called into question, given the context of state, County, and regional policy, the Draft EIR's conclusion that the proposed project's generation of greenhouse gases would be insignificant. " The Placer County Air Pollution Control District coordinates with the Sacramento Metropolitan Air Quality Management District, which sets a clear operational threshold of significance: 1,100 metric tons of CO<sub>2</sub> per year. According to the DEIR, the Project would generate (a grossly underestimated) 45,403 metric tons of CO<sub>2</sub> per year. But that amount is somehow dismissed as insignificant."

### **Cultural Resources**

One of Squaw Valley's greatest assets is its deep cultural values, rooted in Native American history and including the 1960 Winter Olympics. But, according to comments, the Draft EIR failed to adequately analyze impacts to cultural and historic resources.

- *Sierra Watch* pointed out that the Draft EIR failed by failing to identify, for example, that the Project site includes California Historical Landmark No. 724 (Pioneer Ski Area of America, Squaw Valley).
- *Friends of Squaw Valley* agreed, writing that "though the DEIR recognizes the importance of the Olympic era buildings to Squaw Valley, it neglects to note that the entire area has been designated California Historic Landmark 724 relative to the importance of Squaw Valley and its Olympic era to the expansion of the ski industry in California. This designation adds additional impetus to preservation of the remaining Olympic era buildings."

### **Visual Resources**

Squaw Valley is most world-famous for its iconic alpine scenery. Comment letters expressed deep concern for how the proposed development and its highrises could impact visual resources.

- *Friends of Squaw Valley* pointed out that "Visual impact on a scenic vista on visitor groups is under estimated;" and took issue with Draft EIR's twisted logic that no one would really mind: "The analysis separates the groups that frequent Squaw Valley into two: residents and occasional visitors. By doing this the DEIR contends that the visual impact of the project will be less than significant to the occasional visitor group, who have no expectation of what was there before and who constitute the majority of viewers. On the other hand, the DEIR does concede that the visual impact will be significant and unmitigatable for the permanent population and part-time residents of adjacent timeshare and hotel condominium projects, but rationalizes that they are very small in relation to the occasional visitors, and therefore the impact on them can be ignored. Therefore, though impacts to residents is considered significant and unavoidable, the DEIR contends that, because the occasional visitors will be the vast majority of viewers, the overall impact is lessened.
- *Sierra Watch* wrote that the Draft EIR "fails to adequately analyze or mitigate the Project's effects on Squaw Valley's iconic scenery; its simulations downplay the severity and extent of the Project's ten-story tall highrises."
- *Melissa Buroughs* spelled it out in personal terms, "I love Tahoe for the place that it is – a natural, rustic, beautiful beyond words sanctuary. Not a corporate-worshipping, greedy, make a man richer at any costs wasteland;" adding her

particular concern about highrises, "10, 100-foot-tall buildings? You have got to be kidding me. The only skyline I want to see in Tahoe is the majestic peaks at the top of Siberia, the spine down KT-22, the ridges at Granite Chief."

### **Indoor Amusement Park**

At least 60 of the individuals who submitted comment letters took issue with the proposed indoor amusement park, or "Mountain Adventure Center (MAC)", as inappropriate for Squaw and Tahoe:

- *Luca Adriani* wrote, "the thought of a Mountain Adventure Center amusement park in Squaw is one of the most ludicrous things I have heard. We have the number one outdoor activity area in the world. Why would anyone want to go indoors to do what can be done under the sun? Sparks has a great water slide park that people can go and enjoy if they can't find fun in Tahoe."
- *David Kahn* agreed, "The water park feature is absolutely inappropriate for our area; akin to building a ski hill at Sea World in San Diego. It is glaringly out of step with local character and furthers the image of a self-enclosed resort that takes much and gives little to the local community."
- *Carl Thomsen* wrote that "bowling alleys, arcades, water slides, wave rides, etc. are so opposite of the real outdoors that is available in North Lake Tahoe and Squaw Valley in particular that I can't even believe it's being proposed."
- *Erik and Deborah Rogind* professed that "the real adventure center is the valley itself."
- *Emily Kessler* wrote, "The public is missing the point of heading to Tahoe if they need an amusement park and fake H2O slides when you have world class mountains, Lake Tahoe, and the Truckee River, etc. to play in."
- And *Katharine Shiomoto* of Santa Clara urged the County to "support outdoor experiences, creative learning while doing, and support the wider Tahoe community and do not allow the MAC to be built."

### **Lake Tahoe**

Many commenters focused on a glaring inadequacy of the Draft EIR: its assessment of impacts on Lake Tahoe.

- The *League to Save Lake Tahoe* was clear in its assessment of the Draft EIR's consideration of Tahoe, writing that "consequences to the Lake Tahoe Basin were

disregarded in the DEIR;" and that the "Lake Tahoe Basin is a delicate ecosystem that has been completely ignored through the Specific Plan environmental review process."

- *Friends of the West Shore* pointed to "a general failure of the document to assess and consider specific impacts to the Lake Tahoe Basin; "specifically, failing 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."
- *Sierra Watch* reached the same conclusion, "The DEIR fails to adequately describe the regional setting and Squaw Valley's role in the broader Tahoe Sierra; it therefore downplays impacts on noise, traffic, and light pollution on the Tahoe Basin."
- As did *Friends of Squaw Valley*, "The DEIR does not adequately discuss impacts to the Lake Tahoe Basin."
- And the *North Tahoe Preservation Alliance*, "The EIR failed to adequately analyze the environmental impacts associated with the proposed Squaw Valley project on the entire Lake Tahoe basin specifically."

### **CEQA Requirements/Legal Adequacy**

Many of the comment letters included scathing assessments of the Draft EIR's adequacy under the California Environmental Quality Act. These arguments tend to be legalistic and, often, are written to form the basis for future litigation – should it be necessary. Many were coupled with requests to Placer County to either deny the project or pursue additional review. For example:

- *Squaw Valley Mutual Water Company* asserted, "Despite recent revisions, the DEIR lacks crucial details necessary to understand the project and its environmental consequences."
- *Sierra Watch* stated clearly that the Draft EIR "fails to meet the most basic goal of CEQA: to inform the public and decision-makers;" it "fails to assess the range of alternatives required by CEQA;" it "improperly segments linked projects. For example, it ignores the Project's potential relationship to the proponent's proposed

Gondola connection to Alpine Meadows and the local water district's proposal to import water from Martis Valley (Project 60) and their associated impacts."

- *Center for Biological Diversity* urged Placer County, "In light of many significant, unavoidable environmental impacts that will result from the Project, we strongly urge you to deny this Project in its current form."
- *Friends of Squaw Valley* wrote that they "do not believe the DEIR is legally adequate."
- *Sierra Club* stated that "the County must deny the project as proposed and reject any claim of overriding considerations."
- *Squaw Valley Lodge Owners Association* pointed to the "omission of the Squaw Valley Road/Squaw Peak Road intersection" as a "fatal flaw in the DEIR, which must be remedied by recirculation to allow for meaningful public review and comment."
- *Tahoe Residents United for Sustainable Squaw Tourism (TRUSST)* also found the Draft EIR inadequate, "As a result of these inadequacies, the DEIR fails as an informational document and fails to impose feasible mitigation measures to reduce the Project's impacts."
- *Village Inn Owners Association*, concerned for how neighboring highrises would impact their viewsheds, wrote that the Draft EIR "is inadequate in its evaluation of the scenic impact on OVI due to the limited visual analysis conducted from OVI's property."

### **Region/Sense of Place/Size and Scope**

Many of the comments expressed deep, general concerns for what might be the most important, if not easily quantified, value of Squaw and Tahoe: sense of place. According to scores of letters, the project is just too big for its location, and threatens what makes Squaw Valley a unique and special place.

- *Louise B. Jones* wrote about what she appreciates about Squaw Valley, "The fragile bowl-shaped ecosystem's peace and quite - and its invitation to real adventure, not stimulated, indoor adventure - are what make this place what it is."
- *Timothy Lord* wrote, "Squaw Valley is also called home by many dedicated people and families who love and respect their backyard playground. More than anything, this community has created a culture that is unique and valuable. It's

this community character that is being jeopardized by the development plans proposed by KSL."

- *Greg Archbald* commented that the proposed development "describes a monstrous development that is completely out of scale with its environment. It is such a monster that the current application, for all its expense and length, should be rejected out of hand."
- *Chris Ottenweller and Barbara Lovero* of Squaw Valley wrote that the proposed project "is simply too large, too overwhelming, and too intrusive for the unique character of Olympic Valley."
- From the federal perspective, the *Tahoe National Forest* wrote of the proposed project as part of the broader region, with its own unique resources, "We are also very concerned with the potential impacts to the Granite Chief Wilderness, especially to the Five Lakes Basin and to the Pacific Crest National Scenic Trail" and with "significant impacts to National Forest recreational experiences as well as wilderness character;" expressing their commitment to ensure that the project does not have a "negative effect on the wild lands of the National Forest, that are often a big part of why so many people will come here to recreate."

### **Conclusion**

All told, the 338 comment letters are a great example of CEQA doing its job. The letters effectively convey to decision-makers the shared reaction to an individual development proposal.

They tap a deep appreciation for the values of Squaw Valley, Lake Tahoe, and the Sierra Nevada; they draw on experts in key issues like hydrology, wildlife biology, public safety, and transportation; and they demonstrate shared vigilance over the land-use decision making process in the region.

Most of all, they communicate clear opposition to the proposed *Village at Squaw Valley Specific Plan*.

### **About Sierra Watch**

Sierra Watch works to protect great places in the Sierra Nevada. Founded in 2001, the Nevada City based non-profit has built a remarkable track record in land preservation in Tahoe's Martis Valley, on Donner Summit, and for other treasured Sierra landscapes. For more information, visit [www.sierrawatch.org](http://www.sierrawatch.org).