Proposed development on the White Wolf property, between Squaw Valley and Alpine Meadows, presents a clear threat to the natural resources and shared values of the Tahoe Sierra.

The gated resort would spread from Alpine Meadows Road north towards Squaw Valley and west to the Granite Chief Wilderness Area. Plans include a subdivision of 38 single-family custom home lots, fourteen guest units and six employee lodging units; new roads and parking lots; as well as two private ski lifts, equestrian facilities, and tennis courts.

Initial review of the proposed project and the property at stake reveals a number of significant issues and potential impacts, for example: development in land designated for National Wilderness; degradation of the wilderness experience in existing Granite Chief Wilderness; deterioration of the Five Lakes Trail; destruction of regional scenic values; threats to public safety, including the dangers of both wildfire and avalanche; and damage to biological resources, including potential endangered species habitat.
Sierra Watch engaged experts in planning, law, biological resources, and wildfire safety to research and produce the following strategic assessment. Our research is designed to understand the values at stake and potential impacts of the project. This report helps shape strategies in an ongoing effort to protect threatened resources and defend shared values. And it establishes a set of Planning Principles that, if followed, can help ensure responsible land use decision-making for this iconic property in our shared Sierra:

**White Wolf: Planning Principles**

1. Honor and implement the national commitment to lands designated for protection as part of the Granite Chief Wilderness.

2. Protect the Five Lakes Trail as an important regional asset and unique outdoor experience.

3. Ensure that new development does not degrade or overwhelm existing infrastructure.

4. Acknowledge the growing danger of wildfire and protect the health and safety of new and existing residents.

5. Protect lives and property from avalanche danger.

6. Protect the biological resources of the White Wolf property and habitat value of the surrounding area.

7. Process any application for development with full public involvement, thorough environmental assessment, and adherence to existing law.

Note on the place name “Squaw”: Sierra Watch welcomes the impending demise of this pejorative word. This text includes the term simply because to do otherwise, before a new name is widely understood, would render this document less effective—a disservice to both our mission and to the values of White Wolf.
Background: The White Wolf Property

The White Wolf property consists of approximately 455 acres in the upper reaches of the Truckee River watershed, between Squaw Valley and Alpine Meadows ski resorts.

Its mountain landscape includes the rock cliffs that define the eastern boundary of the Granite Chief Wilderness; portions of the Squaw Valley Ski Area, notably the peaks of KT-22, Olympic Lady, and Red Dog Ridge; and a segment of the Five Lakes Trail, a publicly accessible United States Forest Service right-of-way.

Current owner Troy Caldwell purchased the White Wolf Property from Southern Pacific Land Company in 1989 for approximately $400,000.

“I just happened to hit it just right, got lucky and got to own my mountain,” Caldwell told the San Francisco Chronicle in 1995.
His initial impetus was to build a modest bed and breakfast. As his plans grew, ownership proved contentious; Caldwell was sued by his neighbors, to both the north and east.

As local legend has it, Caldwell had essentially bought White Wolf out from under Squaw Valley Ski Resort, and much to owner Alex Cushing’s chagrin. A lease ran with the property, but Squaw sued Caldwell for breach of contract in 1996, beginning years of acrimony and litigation.

“I own KT-22. It is my mountain.” Caldwell told the *San Francisco Chronicle* in 2008. “I own about 70 acres of Squaw. I bought it from Southern Pacific Land Co. in 1990. I still lease that property to Squaw. We’ve continued to lease it since we started this agreement in 1990. I could shut them down if we wanted to go to a courtroom brawl.”

Meanwhile, Caldwell sought to parlay his deal with Squaw Valley into a new chairlift on White Wolf. In 2000, he had secured a permit from Placer County, and he had bargained for lift towers from Squaw. Bear Creek Homeowners Association, his neighbors across Alpine Meadows Road, challenged those approvals in court.

The case was ultimately dismissed, not on the merits, but due to a clerical omission in a court filing. The plaintiffs did prevail in securing restrictions limiting use of the chairlift to “friends and family” and prohibiting Caldwell to sell lift tickets.

The towers were erected along the Five Lakes Trail and up the mountain, with the assistance of Squaw Valley resort, but construction of the erstwhile lift—Caldwell calls it “KT South”—was never completed. All that stands are seventeen poles, serving no purpose but to blight the landscape with concrete footings and steel poles, misbegotten monuments to a failed development scheme. And the original poles permit has expired, rendering each footing and tower not only an eyesore but, also, obsolete.
In 2011, the owners of Squaw Valley and White Wolf had resolved their differences and teamed up to attack the wilderness, announcing a plan for a massive gondola project to connect Squaw and Alpine, proposing to build more towers in land designated for national wilderness protection (see below).

Eight years later, in 2019, Alterra Mountain Company, by that time owner of both Alpine Meadows and Squaw Valley Ski Resorts, secured entitlements for a gondola that would run through the western portion of White Wolf, connecting the two ski resorts.

Final approvals call for towers and a mid-station on leased segments of the White Wolf property. But, per approval documents and a subsequent settlement agreement, the route steered clear of designated wilderness, and use of the gondola is prohibited to any future White Wolf development.
What’s Proposed: Project Summary

Development rumors have clouded the White Wolf property ever since Caldwell bought it more than 30 years ago.

What began then as a modest vision for a small bed and breakfast has grown into plans for an exclusive resort, gated and luxurious, for the super-wealthy.

“To keep the numbers low in that amount of space,” Caldwell told Tahoe Quarterly in 2016, “I had to go super high-end on this thing.”

On November 5, 2019, Placer County released a Notice of Preparation (NOP) for the current White Wolf proposal, providing details and kick-starting the public planning process.

According to the initial planning document, the project would climb from Alpine Meadows Road north towards Squaw Valley and west into land designated to be part of the Granite Chief Wilderness Area.

Caldwell seeks entitlements to create an approximately 275-acre private resort subdivision consisting of 38 single-family custom home lots and fourteen guest units, with roads and onsite parking areas, and two new ski lifts.
New infrastructure to serve the subdivision would include roadways and utilities, including a sewer lift station for the individual lots and an onsite well to supplement piped water from the Alpine Springs County Water District. The mountain, its runs, and ski lifts would be closed to the public, restricted to use by the 38 property owners at White Wolf.

“Guys like (Elon) Musk, who can kind of do some creating,” would fit the profile of a potential homeowner, Caldwell told the *San Francisco Chronicle* in 2019. “If you get a couple of those guys riding on the chairlift together, who knows what they’ll come up with next.”

Passholders at neighboring Alpine Meadows and Squaw Valley resorts, however, would not be able to ride those lifts with Musk. Squaw Valley skiers who push off the lift at the top of KT-22, for example, would be excluded from skiing down the slopes to the south and towards Alpine Meadows. Nor could they enter the warming hut proposed for within Squaw’s resort boundary. Conversely, White Wolf owners would be restricted from using the new proposed gondola. Use of its mid-station, located behind the gates at the proposed White Wolf lodge, is limited only to Alterra’s maintenance crew and emergency personnel.
What’s at Stake: Wilderness Values

The White Wolf property embodies the region’s outdoor ethos, with a classic landscape featuring its own Sierra iconography. It borders the Granite Chief Wilderness Area—including, on its western edge, land designated by the U.S. Congress for National Wilderness under the California Wilderness Act of 1984. And it’s traversed by one of the region’s truly great trails, the Five Lakes Trail, which provides a stunning hiking experience and exceptional access to wilderness.

The mountains—and our shared commitment to maintain them for future generations—is under attack.

National Wilderness designation is the ultimate declaration of public value and open space protection in America—as if the federal government is zoning the land as sacred.

National Wilderness designations began with The Wilderness Act of 1964, one of the greatest achievements in the proud history of American conservation. It’s a bold statement of principle, declaring that America values wilderness and we are committed to protect the wilderness experience, for ourselves and for generations to follow.

The language of the landmark law includes some of the most profound prose ever codified by Congress, recognizing the value of wilderness as “an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain.” Its stated goal: “to secure for the American people of present and future generations the benefits of an enduring resource of wilderness.”

President Lyndon Johnson said he signed the bill into law “for all who love the great American outdoors” as “a faithful trust to the conservation of our natural resources and beauty” to ensure that “future generations are to remember us with gratitude rather than contempt.”
The Wilderness Act works by allowing Congress to designate lands for inclusion in the National Wilderness Preservation System and instructs federal land management agencies to manage wilderness areas to preserve wilderness character, with no roads, no commercial enterprises, no structures. Designation and inclusion are not a one-shot deal. It’s a permanent commitment and a process that can take decades to make reality.

When originally enacted, the Wilderness Act secured immediate protection of more than 9,000,000 acres of public land as federally designated Wilderness. It also created provisions to add, by acts of Congress, more land to the federal wilderness system.

These subsequent wilderness designations do not come easy. Each marks its own remarkable achievement, the result of years of field research, citizen advocacy, and, often, political compromise.

That’s what happened in 1984 when, after more than a decade of careful inventory, as well as five years of Congressional politicking, President Ronald Reagan signed the California Wilderness Act of 1984 into law. It added 3,000,000 acres to the National Wilderness Preservation System, including the newly created Granite Chief National Wilderness Area.

California conservationists, representing groups like Sacramento Audubon Society, Sierra Club, and the Granite Chief Wilderness Task Force, travelled to Washington to testify in Congress, pointing out the growing demand on Sierra wilderness, the land’s value as wildlife habitat, and its proximity to Tahoe.

The House Committee on Interior and Insular Affairs agreed, noting that protecting the Granite Chief area was important to “assist in ongoing efforts to preserve the natural values of the Lake Tahoe region and will also help meet the strong public demand for wilderness in the region.”

They advocated for a larger area—35,000 acres of newly designated Granite Chief Wilderness—and eventually accepted a compromise: designation of roughly 25,000 acres, including undeveloped land in the property now known as White Wolf.
Most of that 3,000,000 total acres designated by the California Wilderness Act of 1984 was privately owned, including more than a third of Granite Chief. To encourage permanent protection, Congress simultaneously authorized the Secretary of Agriculture to purchase any private lands within the newly created Wilderness Area boundaries from willing sellers. The bulk of the privately owned land in the Granite Chief Wilderness was acquired by the Forest Service in 1991, but a portion of the area, including the portion on the White Wolf property, remains in private hands.

So far, the federal government, with help from state, local, and private partners, has secured more than 19,000 acres of the 25,000 acres designated in 1984. And that work goes on. In 2017, The Nature Conservancy and the American River Conservancy donated an additional 3,347 acres of restored land to the Tahoe National Forest for inclusion in the Granite Chief Wilderness Area. The National Forest also purchased 270 acres of private land along the Rubicon River that were designated in 1984 and are now part of the Granite Chief Wilderness Area.

Development on White Wolf presents two clear threats to Congress’s legislative intent: (1) construction on land that is designated for National Wilderness but not yet protected as such—thereby proscribing any future opportunities to enact national intent; and (2) development adjacent to National Wilderness that could impact the wilderness experience.

In 2015 the portion of the White Wolf property that was designated for wilderness was threatened by development by the owners of Squaw Valley, now known as Alterra Mountain Company. With great fanfare, they announced a proposed route for a new gondola from Squaw Valley to Alpine Meadows—on, through, and over designated Wilderness.
Sierra Watch joined four other organizations, *CalWild, Sierra Club, Wilderness Watch*, and *Granite Chief Wilderness Protection League* to defend the wilderness designation and urge proponents to stay out of federally designated wilderness areas. Eventually, developer Alterra agreed. The new approved alignment does stay out of the wilderness designation, although the proximity and intrusion of the gondola itself remains a clear threat to the wilderness experience.

Now, once again, both the wilderness experience and land designated for National Wilderness are at risk. The current White Wolf project proposes roads, commercial enterprise, and structures—exactly what Congress sought to prevent—in the area Congress designated for Wilderness. Granted those acres are still privately owned and not yet subject to public management; their inclusion within the Granite Chief Wilderness Area boundary reflects Congressional recognition that this land is special and should be protected from development. Land use decision-making for White Wolf may be largely local, but, because of the California Wilderness Act of 1984, it’s of national import.

**Planning Principle #1:**

Honor and implement the national commitment to lands designated for protection as part of Granite Chief Wilderness.
What’s at Stake: Five Lakes Trail

The Five Lakes Trail is one of the region’s great outdoor amenities. Forty thousand people visit the trail every year. Famed outdoors writer Tom Stienstra of the San Francisco Chronicle calls it “gorgeous and pristine … one of the best short day hikes in California.”

The trail is a treasured experience in and of itself and unique as an exceptional and easy escape into National Wilderness. As Stienstra points out, “In many cases in the Sierra, it can take hikes of several days and 5,000-foot climbs to reach wilderness basins with several lakes.”

The Five Lakes Trail, however, is different. “The challenge, quiet and lack of mechanization make it the ultimate escape portal,” writes Stienstra. “The Five Lakes Trail is an anomaly because you can get there (into the wilderness) in an hour.”

That trail ascends up and through the White Wolf property for about 2.5 miles, offering steep climbs and stunning views as well as providing what Stienstra calls a “buffer of non-wilderness land” between the pavement of Alpine Meadows Road and the paradise of Granite Chief Wilderness.

The proposed White Wolf project would remake that mountain trail experience and replace it with a walk along subdivisions—through a gated development.

These values—wilderness, hiking, and public access to the great outdoors—are at risk. And, in the Tahoe Sierra, these are not meager real estate amenities. They are priceless resources that provide the type of experience—and prove the commitment to conservation—that define our mountains and sustain the region’s economy.

Planning Principle #2: Protect the Five Lakes Trail as an important regional asset and unique outdoor experience.
What’s Proposed: Infrastructure Demands

The project would include some of its own onsite facilities, and it would tap into existing infrastructure for water and sewer services, police and fire protection, road capacity, energy provision, and schools.

According to initial planning documents, water services would be provided by the Alpine Springs County Water District with supplies augmented by a new well. Offsite improvements could be necessary to ensure adequate water supply and pressure in the existing water district.

Wastewater services would be provided by a combination of the Alpine Springs County Water District and Tahoe Truckee Sanitation Agency.

Fire service would be provided by the North Tahoe Fire Protection District, law enforcement services by the Placer County Sheriff’s Department.

Power and energy would come from a combination of service from Liberty Utilities and individual propane tanks.

Solid waste services would be provided by Tahoe-Truckee Sierra Disposal; waste generated on White Wolf would be transported to the Eastern Placer Regional Landfill.

For schools, the subdivision would be served by the Truckee-Tahoe Unified School District.

Planning Principle #3:
Ensure that new development does not degrade or overwhelm existing infrastructure.
The limited capacity of our existing roadways is of particular concern. As anyone stuck in Tahoe’s infamous gridlock knows, existing development has already overloaded highway capacity.

The White Wolf project might not add the thousands of new daily car trips a mega-development like Alterra’s proposed Squaw Valley Village would. But traffic impacts are, by their nature, cumulative—the gridlock on Highway 89 does not come from a single source. And, because we can’t build our way out of our regional traffic nightmare—not on Highway 89, not on Alpine Meadows Road—the first step in dealing with traffic is to stop approving projects that would make the situation worse. It’s the rule of holes: *stop digging.*
White Wolf Impacts: Fire Danger

Initial planning documents for the proposed White Wolf project identify the potential for “significant risk of loss, injury or death involving wildland fires”, pointing out that the proposed project could “substantially impair an adopted emergency response plan or emergency evacuation plan” and “exacerbate wildfire risks.”

These are issues of increasing importance in the region. Yet they are often overlooked and dangerously downplayed in the planning process. Initial documents for the White Wolf proposal, for example, claim the proposed “enclosed parking structure would be designed and constructed from concrete/non-combustible materials to provide a ‘shelter in place’ facility in the event of wildfire …” and that “structures would be required to be designed and constructed with materials to withstand avalanche and fire.”

*Shelter in place* is not a viable plan for public safety. It is, rather, an admission: *there is no escape*. As the Los Angeles Times points out in a recent editorial, “During the 2017 Thomas fire in Ventura County, new houses built to the strictest fire codes still burned down.” In other words, we can’t build our way out of fire danger.

In order to better understand how new development at White Wolf would impact fire safety, Sierra Watch commissioned an initial assessment by Matt E. Rahn, PhD, JD of The Wildfire Conservancy, a research foundation focused on improving firefighter health and safety, advancing attack effectiveness, and increasing community resilience in the wildland urban interface.
Dr. Rahn encourages decision-makers to understand the context of wildfire in an era of climate change and cumulative development impacts.

“As we witness a paradigm shift in wildfires and risks in the urban interface,” Dr. Rahn writes, “new development should no longer follow previous patterns of approvals and failure, but rather evaluation of proposed projects should take a more critical look at not just how we build our communities, but also where we build them, and why we are willing to continue accepting such high risk to the environment, property, and lives.”

Yet, according to initial documents for White Wolf, “The proposed project would be located within a forested landscape subject to wildfire.” That not only puts future residents at risk from fire, it increases the likelihood of a fire to start—because adding population to the forest/urban interface increases the likelihood of wildfire ignition.

“Over 95% of all fires in California are the result of human activity, not natural events. Given that the preponderance of fires are not the result of natural events, it is therefore reasonable to assume that any increased development and human presence in an area can have a concomitant increase in human caused fires. This is particularly concerning for growth within known high fire risk zones,” cautions Dr. Rahn.

In the Tahoe Sierra, wildfire danger—and the inability to evacuate—is exacerbated by limited infrastructure.

Nevertheless, local officials keep greenlighting subdivisions in the forest/urban interface. And California keeps learning lessons the hard way. In 2016, for example, Placer County Supervisors voted to give entitlements to Alterra Mountain Co. for its proposed development in Squaw Valley—even though, according to their own environmental review, it would take more than ten hours just to escape the new development and get stuck in the existing traffic on Highway 89. That’s not planning for disaster; it’s planning a disaster.

As Dr. Rahn puts it, “Our communities simply deserve better.”

But, the White Wolf proposal is already raising red flags. “In this case,” according to Dr. Rahn, “the risk to the proposed community is so high that it is seemingly not a question of whether this area will experience a catastrophic loss, but when.”

And a so-called shelter-in-place strategy is unlikely to ensure public safety.
“Shelter-in-place is not only a dangerous strategy,” writes Dr. Rahn, “it has a long history of catastrophic failures and can be terribly tragic … The simple fact that any project is even contemplating a shelter-in-place option (due to threats along evacuation routes among other factors) only serves to highlight the risk to the proposed community; it is an acknowledgement that evacuation may not only be infeasible, but impractical in certain conditions.”

The project’s admitted impact on “significant risk of loss, injury or death involving wildland fires” is compounded by the effects of climate change. According to Dr. Rahn:

There is consensus within the scientific community that climate change will generally increase fire risk due to its effects on fuel loads and weather, and in fact we have seen a dramatic shift in the frequency and intensity of wildfires throughout North America. Shifting climatic conditions and land use change are combining to produce more frequent and intense wildfires while also expanding the overall annual wildfire season.

California is considered a climate change hotspot likely to experience higher than average impacts when compared to the rest of the United States. In fact, we may already be seeing these effects. Compounding this risk is the prediction that large fires (defined as 500 acres or more) will increase nearly 35% by 2050, and an alarming 55% by the end of the century. If our population expands into and increases the WUI (Wildland Urban Interface), there is a concomitant increase in the probability of property losses due to wildfires. All of these high risk factors describe the proposed project.

If the proposed White Wolf project moves forward in the public planning process, Dr. Rahn writes, “It is incumbent to first determine if the approval of the project outweighs the impacts to existing infrastructure, fire protection agencies, and overall community safety.”

Planning Principle #4:

Acknowledge the growing danger of wildfire and protect the health and safety of new and existing residents.
And he offers key issues that “must be addressed in order to accurately evaluate the risk and burden this development places on the community:”

1. Adopting advanced protection standards for improved community resilience, taking into account advanced design and materials standards, the ability of the community to recover effectively, and the ability to adapt to changing conditions in the future;

2. Evaluating the community’s ability to effectively and safely evacuate, and the burden this additional project places on an already stressed infrastructure;

3. Critically addressing the logic of sheltering in place and the enhanced risks that places on the community, along with utilizing conceptual modeling that can help determine how best to respond to the diversity of threats that the community can face;

4. Ensuring that the development does not create any significant additional risks to the health and safety of the community from a wildfire (e.g. carcinogenic, toxic, and hazardous exposures) or a risk to first responders and firefighters who respond to protect the community;

5. Ensuring that fire modeling and planning take into account the most recent advancements and understanding, and accounting for those factors that are most likely to lead to a significant community threat and/or loss.
White Wolf Impacts:
Avalanche Danger

In this part of the Sierra, avalanche danger is a fact of life. Alpine Meadows experiences more avalanches per year than any other ski resort in the United States. In the winter of 1966-67, a series of avalanches forced the closure of Alpine Meadows Road for 22 days. The region is still reeling from the 1982 tragedy that killed seven people and severely injured five more. Avalanches in the late 1990s caused extensive damage to homes. And just last year a skier died in an avalanche at the resort.

Nearly 40 years ago, in response to the deadly 1982 avalanche season, Placer County developed a map of avalanche hazards and an avalanche ordinance.

According to that map, portions of the White Wolf property fall within moderate and high avalanche hazard zones—where an avalanche is “expected to occur with a probability of one chance in twenty per year.”
Placer County’s Notice of Preparation (NOP, an initial planning document) for the proposed White Wolf development acknowledges the danger and discloses that its Environmental Impact Report (EIR) will include an avalanche risk evaluation to analyze hazards for the proposed project and surrounding developments.

It’s critical that future assessments include an analysis not only of past avalanche activity but, also, a projection of the impact of climate change on avalanche risk. Climate change brings more rain-on-snow events to the area, which can increase avalanche danger.

Placer County’s 1983 Avalanche Zone Map, showing High (H) hazard on the White Wolf property

Planning Principle #5:
Protect lives and property from avalanche danger.
White Wolf Impacts: Biological Resources

The White Wolf property is incredibly rich in biological resources and critical to habitat connectivity.

The land includes a range of habitats and waterways. Much of the natural land cover of the property is rock and talus, including a significant amount of exposed granitic basement rock.

Vegetation is dominated by montane chaparral and shrub communities, including Sierran mixed conifer forest, red fir forest, huckleberry oak chaparral, Sierran willow thickets, montane riparian, and thickets of American dogwood.

As pointed out in the environmental review for the gondola project, ephemeral drainages and associated small riparian areas and wetlands occur on the property, including a notable draw in the western portion of the property; the property drains to Bear Creek and ultimately the Truckee River. Riparian habitat includes perennial, intermittent, and ephemeral streams; pond; wet meadows; seasonal wetlands; and seeps.

White Wolf is home to a variety of native fauna, ranging from the bald eagle to the long-toed salamander. The project's Initial Study disclosed that the site provides suitable habitat for seven special-status plant species and eight special-status wildlife species, including the Cooper's hawk, yellow warbler, olive-sided flycatcher, willow flycatcher, golden eagle, peregrine falcon, black swift, and California spotted owl.

Likely plant species of concern include sedges and sage, alder buckthorn, and Munro’s desert mallow.

Perhaps most important, at least in terms of land use planning on the property, is the landscape’s role in the viability of the Sierra Nevada Yellow-legged Frog, a federally listed endangered species.
The frog is not known to occur on the property today. But it historically utilized the White Wolf site for breeding and for migration between Five Lakes and Bear Creek. And there are efforts emerging to re-introduce this species in nearby locations.

Almost all the property and all the proposed development areas fall within federally designated Sierra Nevada Yellow-legged Frog Critical Habitat. The western half of the property is within the Sturdevant Ridge – Mosquito Ridge/Crystal Ridge Essential Habitat Connectivity Area.

Sierra Watch engaged ecologist Michael D. White, PhD to review existing research available for the White Wolf property and describe the general biological setting and potential issues and constraints for development.

According to Dr. White, “Development in the Wilderness or Essential Habitat Connectivity Area is not compatible with conservation and management objectives of these designations.”

Dr. White goes on to describe the importance of local habitat to the frog’s survival, “The Five Lakes Basin provides all of the habitat features required by the Sierra Nevada Yellow-legged Frog, including adequate upland dispersal habitat, which allows the species to periodically recolonize unoccupied habitats, thereby increasing the overall quality of the area to the species.”

The U.S. Fish and Wildlife Service agrees:

*This subunit (Five Lakes) is considered to be within the geographical area occupied by the species at the time of listing, and it contains the physical or biological features essential to the conservation of the species, is currently functional habitat sustaining frogs, and is needed to provide for core surviving populations and their unique genetic heritage.*
Dr. White summarizes how cumulative impacts, including the proposed development, pose an existential threat, “Although the frog may not occur in the project area, developing the property could cause additional adverse indirect and cumulative impacts to its habitats in the Basin, which are already affected by nonnative fish, low water quality, and high levels of human activity.”

The federal government does not take such threats lightly. The Endangered Species Act (ESA) is designed to protect imperiled species and the ecosystems on which they depend. The ESA provides for federal government oversight of activities that might impact threatened or endangered species. Numerous reports indicate that the ESA has been remarkably successful, with 99 percent of the species listed avoiding extinction.

Any species, including the Sierra Nevada Yellow-legged Frog, listed as endangered under the ESA is one that is in danger of extinction throughout all or a significant portion of its range. The ESA prohibits “take” of listed species without a federal permit. “Take” is defined under the ESA to include not just actually killing or capturing an individual animal, but also to include harm to the animal, which includes “significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering.”

The tenuous existence of the frog not only raises a high hurdle for potential development entitlements, it reminds us of what’s at stake: the timeless natural heritage of our Sierra Nevada.

**Planning Principle #6:**
Protect the biological resources of the White Wolf property and habitat value of the surrounding area.
What’s Needed: Summary of Approval Processes

Project proponent Troy Caldwell does not seek to cash in on existing property rights; he seeks new development entitlements. For example: all but roughly 3 of the property's 275 acres are currently zoned either Open Space or Forest Recreation.

In California, most land use decision making is local, and Placer County will serve as lead agency for the project. But federal and state regulators will come into play as well.

Before conducting any development activities, Caldwell would need to secure amendments to the Placer County General Plan, rezoning from existing Open Space designations, conditional use permits, a Lake and Streambed Alteration Agreement from California Department of Fish and Wildlife, federal Clean Water Act permits, and a National Pollutant Discharge Elimination System Permit from the Regional Water Quality Control Board.

For Placer County entitlements, the following permits and approvals are anticipated to be required to implement the project:

1. California Environmental Quality Act Environmental Review and EIR Certification: The California Environmental Quality Act, or CEQA is California’s premier environmental law. Passed by the California Legislature and signed into law by Governor Ronald Reagan in 1970, CEQA was the first state law to require disclosure and reduction of environmental impacts of any project approved by a government agency. CEQA also provides for a public process through which the public can engage decisionmakers as they consider approvals and hold those decisionmakers accountable.

CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects. The heart of CEQA is public preparation of an Environmental Impact Report (EIR)
to analyze potential impacts of the project. The County must review the project EIR and certify the document before the project can be implemented. In Placer County, the Board of Supervisors ultimately certifies an EIR and approves a project, though the Planning Commission typically first reviews the documents and makes a recommendation to the Board on what action to take. Prior to Planning Commission review, the project and its EIR may also be reviewed and a recommendation made by the applicable Municipal Advisory Council.

As part of the CEQA process, Placer County released its Notice of Preparation (NOP) on November 6, 2019, stating that an EIR will be prepared for the project. The County first will prepare and circulate a Draft EIR for public comment. Responses to the comments will be incorporated into a Final EIR, which will also be circulated for public comment. After public comment is received on the Final EIR, the County will hold a hearing before the Planning Commission, at which the Planning Commission accepts public comment on the project and EIR and makes a recommendation to the Board of Supervisors.

Finally, the Board of Supervisors holds a hearing and decides whether to certify that (1) the final EIR has been completed in compliance with CEQA, the State CEQA Guidelines, and the Placer County Code; (2) that the final EIR was presented to the approving authority, who reviewed and considered the information in the final EIR prior to project approval; and (3) the final EIR reflects the lead agency’s independent judgment and analysis.

2. **General Plan Amendment:** A General Plan Amendment (GPA) would be required because the project proposes development outside the limits of development identified by the County’s existing Alpine Meadows General Plan. Like with the EIR, the GPA is initially reviewed by the Planning Commission. After a hearing, the Planning Commission makes a recommendation on the approval to the Board of Supervisors, which makes the final decision on whether to approve the GPA.

3. **Rezone:** The Project requires County approval to rezone the project site to accommodate the proposed subdivision project. The current Open Space zoning allows public recreation uses, like ski lifts, ski runs, sports
facilities, and outdoor public assembly spaces. The proposed project would require rezoning of Open Space to Single-Family Residential zoning to provide for private residential resort uses. Similar to a GPA, re-zonings are reviewed by the Planning Commission, with final decisions made by the Board of Supervisors.

4. **Conditional Use Permit**: A conditional use permit would be required for construction and operation of the proposed ski lifts, warming hut, and associated structures and amenities. A conditional use permit is a discretionary permit that frequently incorporates specific conditions for the approved use. Placer County’s conditional use permit process requires the Planning Commission to hold a public hearing. After the public hearing, the Planning Commission determines whether to approve or disapprove the conditional use permit. Decisions of the Planning Commission regarding conditional use permits may be appealed to the Board of Supervisors.

5. **Vesting Tentative Subdivision Map**: County approval of the proposed Vesting Tentative Subdivision Map is required to entitle the property to be subdivided into individual residential and common area lots. The Placer County Planning Commission is designated as the agency that approves tentative maps, but County practice is that when packaged with other approvals requiring Board of Supervisors review—as is the case here, the Planning Commission makes only a recommendation on approval of the vesting tentative map, and final approval is made by the Board of Supervisors.

6. **Final Subdivision Map**: A Final Subdivision Map is required to be submitted to Placer County for recordation that creates the individual residential and common area lots.

7. **Improvement Plans**: Grading, earthwork, and construction of improvements required for the project requires approval of Improvement Plans from the County.

8. **Encroachment Permit**: An Encroachment permit would be required from the County to permit work and improvements within the Placer County Highway Easement / Right-of-Way.

9. **Building Permits**: Proposed building construction requires issuance of building permits by the County. Building permits are issued after improvement plans are approved.

10. **Tree Permit**: A tree permit from the Placer Department of Public Works is required for tree removal as part of the Project.
Beyond Placer County, a series of permits and approvals from other agencies and utilities could be required to implement the project:

1. **Lake and Streambed Alteration Agreement**: California Department of Fish and Wildlife requires a Lake and Streambed Alteration Agreement when a project activity may substantially adversely affect fish and wildlife resources. The project applicant would need to establish the Agreement with California Department of Fish and Wildlife for disturbance to the bed or bank of lakes or streams including sensitive riparian areas.

2. **Section 404 Clean Water Act Nationwide Permit Compliance**: Section 404 of the Federal Clean Water Act establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Section 404 requires a permit before dredged or fill material may be discharged. Permit applicants must show that steps have been taken to avoid impacts to wetlands, streams, and other aquatic resources. Individual permits are reviewed by the U.S. Army Corps of Engineers.

3. **Section 402 National Pollutant Discharge Elimination System (NPDES) Permit**: Section 402 of the Federal Clean Water Act requires that all construction sites on an acre or greater of land discharging wastewater or stormwater directly from a point source into a surface water of the United States must obtain permission under the National Pollutant Discharge Elimination System. All NPDES permits are written to ensure the United States’ receiving waters will achieve specified Water Quality Standards. The NPDES permit program is administered by the Regional Water Quality Control Board.

4. Approval of construction documents and will-serve letters would be required from various utility and services providers prior to construction.

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**Planning Principle #7:**

Process any application for development with full public involvement, thorough environmental assessment, and adherence to existing law.
What: Potential Outcomes

In setting goals for a given property and shaping an advocacy campaign to achieve them, Sierra Watch takes a mission-driven approach, based on values.

Outcomes vary as the landscapes do. In some places, like Martis Valley, Sierra Watch has been part of a collaborative effort to create a blueprint that includes a combination of limited development and permanent conservation. Twenty years ago, we engaged planners and biologists to come up with Conservation Priority areas for Martis, seeking to identify land of the highest conservation value and to focus development where it makes the most sense. Decades later, through strategy and discipline, that Sierra Watch vision—based on conservation values, has largely come to fruition.

Similarly, as part of our ongoing effort to Keep Squaw True, we engaged architects and planners to come up with a limited development scenario as an alternative to Alterra’s proposed project. The Placer County Board of Supervisors, however, gave Alterra everything they asked for. Sierra Watch is challenging those illegal approvals in court. And our ongoing effort to keep Tahoe Truckee True is a work in progress.

On Donner Summit, in the face of the massive development proposed for the Royal Gorge property in 2006, we engaged experts to craft a limited development alternative. But, due to the property’s conservation value and limited infrastructure, the highest and best use of the land was not in developing it for short-term gain but in conserving it for the long haul. Working with homeowners, conservation allies, and land trusts, that’s the outcome we achieved: completely stopping irresponsible development proposals and securing purchase and protection of the entire threatened property.

For White Wolf, we hope to help shape a collaborative blueprint for its future, shaped by our growing understanding of the property, its conservation resources, and its suitability for development.
How: Strategies

How do we go about the work of protecting those values, of stopping irresponsible development, of securing a good outcome? Based on our experience in similar campaigns and on what we can predict for the months—and years—ahead, we can identify five key areas of strategic engagement:

1. Proactive Planning and Legal Advocacy
   - Assess important values and potential constraints on development.
   - Engage in CEQA and related regulatory processes.
   - Define collaborative planning outcomes.

2. Coalition Building and Coordination
   - Work with regional conservation groups and local landowners.
   - Provide staff resources to coordinate concerted campaign efforts.

3. Grassroots Organizing
   - Recruit supporters and engage volunteers in the public planning process.
   - Generate constituent letters and phone calls to key decision makers.
   - Hold community workshops and other events.

4. Media and Communications
   - Broadcast updates to volunteers, supporters, and key players.
   - Generate strategic press coverage.

5. Fundraising
   - Recruit supporters.
   - Engage donors.

The intensity of each strategy changes over time. For example, with the release of a Draft Environmental Impact Review, our resources will likely focus on Proactive Planning and Legal Advocacy. At the time of public hearings, we prioritize Grassroots Organizing.

Fundamental to long-term success is the capacity to think through an effective campaign, to build the resources to get the necessary work done, and to follow through with commitment and discipline.
We’re in it for the long haul. Because our Sierra landscape and its timeless natural values deserve no less.

Sierra Watch worked to defend Donner Summit for more than five years. We’ve been working to Keep Squaw True for ten. And we’ve been working to Save Martis Valley for more than twenty.

On White Wolf, we’re just getting started. And, as we move forward, we’ll expand our understanding of the landscape and adapt strategies accordingly. For now, we’re confident that if we ensure that planning for the property meets the test of our principles, we’ll succeed in protecting the irreplaceable value and unique sense of place of White Wolf and the region. And, maybe, as President Johnson put it, future generations will “remember us with gratitude rather than contempt.”

**For more about Sierra Watch and our work to turn development threats into conservation opportunities, visit [sierrawatch.org](http://sierrawatch.org).**