



Placer County Board of Supervisors
3091 County Center Drive
Auburn, CA 95603

November 13, 2016

Subject: Proposed Village at Squaw Valley Specific Plan

Dear Members of the Placer County Board of Supervisors:

The Friends of the West Shore (FOWS) appreciates this opportunity to provide comments on the Proposed Village at Squaw Valley Specific Plan (VSVSP), including the Final Environmental Impact Report (FEIR) and related documents. FOWS works toward the preservation, protection, and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations, and represents community interests from Emerald Bay to Tahoe City. Although FOWS is concerned with the numerous extensive impacts of the VSVSP, our comments focus primarily on impacts to the Lake Tahoe Basin, which include:

- Increased vehicle trips within the Tahoe Basin, impacting Level of Service (increased congestion) and Vehicle Miles Traveled (VMT);
- Increased threats to public health and safety from contributing more traffic to congested roadways thereby further impeding emergency access and evacuation routes; and
- Additional air and water pollution.

As heard by your Planning Commission on 8/11/2016, as well as during your 9/13/2016 hearing for the Martis Valley West Parcel Specific Plan (another project that will increase traffic in the Basin – notably to a smaller degree than the VSVSP), emergency responders are already concerned about heavy traffic conditions in the Tahoe Basin and Truckee area.

While the draft Statement of Overriding Considerations claims multiple benefits associated with the project, there are no benefits for Lake Tahoe. There are only consequences. FOWS asks Placer County to afford Lake Tahoe the special protection it deserves by denying this project as proposed, and ensuring that if/when a revised alternative is provided, a smaller-sized project be considered (with adequate analysis of impacts and implementation of all available mitigation options to reduce impacts to Lake Tahoe). FOWS also recommends that County staff coordinate with the TRPA and other appropriate entities to define and address the capacity of roadways in the North Tahoe/Truckee Region to provide emergency access and evacuation routes prior to contributing further to these problems.

Additional comments regarding the newly released “Response to comments on the Final EIR” are attached. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

I. Response to Comments on the Final EIR:

Without providing additional time for public review or the opportunity for Planning Commission deliberations, a new package of responses to post-FEIR comments was posted on 11/9/2016. Notably, this provided the public with two business days before the 11/15/2016 Board of Supervisors meeting to review hundreds of additional pages of documents. In addition, Placer County also recently released several hundred more pages for the public to digest related to the final Tahoe Basin Area Plan¹ during this same time period. The public should be afforded more time to review new information related to projects, especially when they will substantially affect our area for the next 20-30 years and beyond.

With regards to the new section responding to post-FEIR comments, “Master Responses” for several transportation-related impacts are provided (p. 1-6) which appear to dismiss concerns regarding impacts to Lake Tahoe for several reasons (our responses follow each point below).

1. TMDL and water quality impacts:

The response discusses the Tahoe TMDL and various existing and planned efforts in the Lake Tahoe Basin; the implication appears to be that the VSVSP need not be concerned with mitigating the project’s own in-Basin VMT impacts because existing efforts to address Lake Tahoe’s water quality are already underway.

The VSVSP cannot rely on existing efforts, notably funded by the public and in-Basin property owners, to mitigate the additional water quality impacts resulting from the project’s VMT.

2. TRPA/TMPO Regional Transportation Plan EIR/S:

The response appears to suggest that because the TRPA/TMPO RTP EIR/S purportedly already included increased VMT from regional growth, the impacts have already been evaluated.

This is not only proven incorrect by a review of the RTP EIR/S (which shows the VSVSP was not included), but also the inclusion of the additional VMT generated by the VSVSP in Placer County’s Tahoe Basin Area Plan DEIR/S (see App. G-2; on file with Placer County).

3. The VMT standard is recommended for re-evaluation:

The response appears to suggest that it isn’t necessarily important to meet the VMT standard because there have been recommendations to re-evaluate it sometime in the future.

The TRPA regional VMT standard is the legal standard currently applicable to the Tahoe Basin. That it has been recommended for evaluation in the future does not negate the need to evaluate and disclose the project’s impacts to the VMT standard.

¹ <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/tahoebasinap>