

Volume 2

Squaw Valley | Alpine Meadows Base-to-Base Gondola Project

Final EIS/EIR - Responses to Comments

SCH# 2016042066



April 2019



PREPARED FOR:

US Forest Service
Tahoe National Forest
Truckee Ranger District
10811 Stockrest Springs Road
Truckee, CA 96161

Placer County
Planning Services Division
3091 County Center Drive
Auburn, CA 95603

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April 2019

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1 INTRODUCTION TO VOLUME 2

This final environmental impact statement/environmental impact report (EIS/EIR) has been prepared by the U.S. Forest Service, Tahoe National Forest (Forest Service) and Placer County (County) in accordance with the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The Forest Service is the lead agency under NEPA and the County is the lead agency under CEQA. This Final EIS/EIR has been prepared to respond to comments received on the Draft EIS/EIR for the Squaw Valley | Alpine Meadows Base-to-Base Gondola Project, which includes a proposed gondola connecting Squaw Valley and Alpine Meadows, with two mid-stations and multiple towers along the alignment in Placer County, California.

The Forest Service and the County considered the comments received on the Draft EIS/EIR. The comments received did not warrant substantive changes in the Draft EIS/EIR. Therefore, the Final EIS/EIR consists of the entire Draft EIS/EIR, as revised (Volume 1), and the comments and responses to comments (Volume 2).

1.1 PURPOSE OF THE FINAL EIS/EIR

Both NEPA and CEQA require a lead agency that has completed a Draft EIS or EIR to consult with and obtain comments from public agencies that have legal jurisdiction with respect to the proposed action, and to provide the general public with opportunities to comment on the Draft EIS or EIR. This Final EIS/EIR has been prepared to respond to comments received from agencies and the public on the Draft EIS/EIR for the Squaw Valley | Alpine Meadows Base-to-Base Gondola Project.

1.2 NEPA AND CEQA REQUIREMENTS FOR RESPONDING TO COMMENTS

NEPA requires that the Final EIS include and respond to all substantive comments received on the Draft EIS (40 Code of Federal Regulations [CFR] 1503.4). Lead agency responses may include the need to:

- ▲ modify alternatives including the proposed action;
- ▲ develop and evaluate alternatives not previously given serious consideration by the agency;
- ▲ supplement, improve, or modify its analyses;
- ▲ make factual corrections; or
- ▲ explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons that support the agency's position and, if appropriate, indicate those circumstances that would trigger agency reappraisal or further response.

The State CEQA Guidelines state that written responses to comments received on the Draft EIR must describe the disposition of significant environmental issues. In particular, the major environmental issues raised when the lead agency's position is at variance with recommendation and objections raised in the comments must be addressed. (See State CEQA Guidelines Sections 15088, 15132.)

1.3 ORGANIZATION OF THIS VOLUME OF THE FINAL EIS/EIR

This Volume of the Final EIS/EIR is organized as follows:

Chapter 1, “Introduction,” provides an introduction and overview of the Final EIS/EIR, describes the background and organization of the Final EIS/EIR, and lists all parties who submitted comments on the Draft EIS/EIR during the public review period. Additionally, this chapter presents minor modifications to and clarifications of the Squaw Valley | Alpine Meadows Base-to-Base Gondola Project as a result of ongoing planning and design refinements since publication of the Draft EIS/EIR; and summarizes revisions to the Draft EIS/EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Finally, this chapter concludes with a set of master responses that were prepared to comprehensively respond to multiple comments that raised similar issues. A reference to the master response is provided, where relevant, in responses to individual comments.

Chapter 2, “Response to Comments on the Draft EIS/EIR,” contains copies of the comment letters on the Draft EIS/EIR received during the public review period, a copy of the transcript from the May 24 public hearing, and responses to the comments. Eight comment letters were received within two weeks of the close of the public review period are also included and responses to those letters are provided. An additional letter was received in December 2018, more than 6 months after the end of the comment period, and is not responded to in this Final EIS/EIR.

Chapter 3, “References,” lists the documents used to support the comment responses.

1.4 SUMMARY OF PUBLIC INVOLVEMENT

1.4.1 Scoping

The Forest Service and Placer County used several methods to solicit input on the Draft EIS/EIR, including distribution of a notice of preparation (NOP) on April 22, 2016, and publication of a notice of intent in the *Federal Register* on April 29, 2016, to inform agencies and the general public that an EIS/EIR was being prepared and to invite comments on the scope and content of the document. The Forest Service distributed a scoping package to interested individuals and organizations. Placer County prepared the CEQA Initial Study Checklist for the project, which was posted on the County’s website and mailed to individuals and organizations on the mailing list. Two joint Forest Service and Placer County public scoping meetings were held on May 9, 2016 at the Resort at Squaw Creek. Following the close of the public scoping period, the Forest Service and Placer County decided to combine the NEPA/CEQA processes and produce a joint EIS/EIR. The Forest Service and Placer County announced this change through a press release and revised NOP published on September 2, 2016, and Placer County accepted additional scoping comments until October 3, 2016.

1.4.2 Public Review of the Draft EIS/EIR

On April 27, 2018, the Draft EIS/EIR was released for a 45-day public review and comment period that ended on June 11, 2018. The Draft EIS/EIR was submitted to the State Clearinghouse; posted on the project website and the County’s website (Initially posted at:

<https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/squawvalleygondolaproject>; currently available at: <https://www.placer.ca.gov/2680/Squaw-Valley-Alpine-Meadows-Base-to-Base>); and was made available at the Tahoe City and Truckee libraries, Placer County offices in Auburn and Tahoe City, and the Tahoe National Forest offices in Nevada City and Truckee. In addition, a notice of availability (NOA) of the Draft EIS/EIR was published in the *Federal Register* on April 27, 2018. Finally, notice of the

Draft EIS/EIR was published in *The Tahoe World* (part of *The Sierra Sun*) on April 27, 2018 and *The Union* on April 28, 2018; and distributed directly to public agencies (including potential responsible and trustee agencies), interested parties, and organizations.

A public hearing was held on May 24, 2018, to receive input from agencies and the public on the Draft EIS/EIR. The hearing was held during the regular meeting of the Placer County Planning Commission at 10 a.m. The hearing was recorded and a transcript was prepared. A Forest Service open house was conducted on May 22, 2018 at the Truckee Ranger District Office in Truckee, CA.

1.5 LIST OF COMMENTERS

Table 1-1 indicates the author of each comment letter received on the Draft EIS/EIR, the numerical designation for the comment letter, and the date of the comment letter. In summary, one letter was received from a federal agency, two letters were received from state agencies, 13 letters were received from organizations, 174 letters were received from individuals, various commenters provided verbal comments on the public hearing, and eight letters were received after the close of the public comment period, but within two weeks after the close. An additional letter was received in December 2018, more than 6 months after the end of the comment period, and is not responded to in this Final EIS/EIR.

Table 1-1 List of Commenters		
Commenter	Letter #	Date of Comment
Federal Agencies		
U.S. Environmental Protection Agency, Region IX Kathleen Martyn Goforth, Manager, Environmental Review Section (ENF-4-2)	0109	6/8/2018
State Agencies		
Lahontan Regional Water Quality Control Board Liz van Diepen, North Basin Regulatory Unit	0185	6/11/2018
California Department of Transportation, District 3 Kevin Yount, Branch Chief	0200	5/21/2018
Organizations		
Squaw Valley Alpine Meadows (SVAM) Adrienne L. Graham, Environmental and Planning Consultant	0064	6/8/2018
Squaw Valley Alpine Meadows (SVAM) Michael J.P. Hazel and Andrew L. Spielman of WilmerHale	0071	6/11/2018
Granite Chief Protection League Daniel D. Heagerty, Director	0072	6/11/2018
Center for Biological Diversity Jennifer L. Loda, Staff Attorney, and Holly Ingram, Law Clerk	0097	6/11/2018
North Fork Association Richard Mackey, DVM, President	0104	6/11/2018
Pacific Gas and Electric Company (PG&E) Plan Review Team	0127	6/11/2018
Pacific Gas and Electric Company (PG&E) Plan Review Team	0135	5/7/2018
Friends of the West Shore Judith Tornese, President, Laurel Ames, Conservation Chair, and Jennifer Quashnick, Conservation Consultant	0144	6/9/2018

Table 1-1 List of Commenters

Commenter	Letter #	Date of Comment
Sierra Watch Amy J. Bricker and Laurel L. Impett, AICP of Shute, Mihaly & Weinberger LLP	0166	6/8/2018
Sierra Watch Attachment A Michael D. White, PhD	0167	6/6/2018
Squaw Valley Alpine Meadows (SVAM)	0175	Not dated
Squaw Valley Lodge Owners Association David Walters, President, and Steven Arns, B2B Committee Chair	0176	6/5/2018
Pacific Crest Trail Association Connor Swift, Northern Sierra Regional Representative	0179	6/7/2018
Truckee River Watershed Council Lisa Wallace, Executive Director, and Matt Freitas, Program Manager	0189	6/1/2018
Individuals		
Anderson, Nick	0001	5/22/2018
Anon, Anon	0002	5/20/2018
Anon, Anon	0003	6/11/2018
Asher, Tyler	0004	5/21/2018
Ayers, Michael	0005	5/18/2018
Bakker, Elena	0006	5/22/2018
Baldassare, Daniel	0007	6/11/2018
Ball, Jeff	0008	4/30/2018
Ball, Jeff	0009	6/10/2018
Baumgartner, Walter F.	0011	5/18/2018
Bemus, Steve	0012	6/4/2018
Bennett, Mary	0013	6/5/2018
Benson, Derik	0014	5/18/2018
Benton, Steven	0015	6/5/2018
Beverstein, Roxanne	0016	5/22/2018
Blakeney, Marc	0017	6/11/2018
Borhani, Maya Tracy	0018	6/10/2018
Borhani-Bakker, Petra	0019	5/22/2018
Bourke, David	0020	6/3/2018
Bridges, Steve	0021	6/5/2018
Bruner, Judy	0022	6/10/2018
Bryce Thayer, Jonathan	0023	5/18/2018
Buffington, Laurie	0024	6/11/2018
Caldwell, Troy	0025	Not dated
Carter, Tom	0026	6/10/2018
Casaudoumecq, John	0027	6/6/2018
Casini, Madona	0028	6/11/2018
Chador, Sharla	0029	6/5/2018
Chadwick, Mitchell	0030	6/11/2018

Table 1-1 List of Commenters

Commenter	Letter #	Date of Comment
Chatten-Brown, Justin	0031	5/18/2018
Cornew, Dan	0033	5/21/2018
Crawford, Ken	0034	5/22/2018
Cutrano, Chance	0035	6/11/2018
Davis, Warren	0036	5/18/2018
Doherty, David	0037	5/15/2018
Dombroski, Caryn	0038	6/5/2018
Downs, Bill	0039	5/12/2018
Downs, Bill	0040	6/9/2018
Downs, William	0041	5/12/2018
Duggan, Theresa May	0042	6/7/2018
Durham, Jr., Robert J.	0043	6/7/2018
Egger, Chris	0044	6/11/2018
Ehring, Jill	0045	5/23/2018
Elliott, Bryan	0046	6/11/2018
Elrod, Nancy	0047	6/7/2018
Ephraim, Gary	0048	5/18/2018
Evan	0049	5/20/2018
Farrow, Roy	0050	6/5/2018
Fisher, Mark	0051	6/11/2018
Flores, Victor A.	0052	6/7/2018
Fulda, Don	0053	6/10/2018
Gaffney, M.D., Robb	0054	6/10/2018
Gaffney, Scott	0055	5/22/2018
Gallant	0056	6/2/2018
Ganong, Travis	0057	5/13/2018
Gardner, Mike	0058	5/21/2018
Gellerman, Eric	0059	5/22/2018
Goldman Schuyler, Kathryn	0061	5/21/2018
Gonsalves, Bill	0062	5/18/2018
Graf, Susan	0063	6/8/2018
Green, Kate	0066	4/29/2018
Grossman, Adam	0067	6/5/2018
Hamilton, Craig	0068	5/23/2018
Hamilton, Susan	0069	5/23/2018
Hanshew, Jon	0070	5/21/2018
Hendricks, John	0073	5/23/2018
Heneveld, Ed	0074	6/10/2018
Heykes, James	0075	5/24/2018
Hinkel, Chris	0076	5/21/2018

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Commenter	Letter #	Date of Comment
Hirsbrunner, Caspar and Ursula	0077	Not dated
Hover-Smoot, Katy	0079	6/11/2018
Hudson, Dan	0080	5/11/2018
Irby, Sereena	0081	6/11/2018
Irby, Sydne	0082	6/11/2018
Jager, Bill	0083	5/4/2018
John, John	0084	5/6/2018
Johnson, Carrie	0085	5/26/2018
Keniston, Ann	0086	6/11/2018
Kennedy, Derek	0087	5/18/2018
Kennerley, Gary	0088	5/22/2018
Kessler, Shawn	0089	5/18/2018
Knight, Stan	0090	5/18/2018
Lane, Tom	0091	6/1/2018
Larsen, Nils	0092	6/11/2018
Larsen, Sondrea	0093	6/11/2018
Larson, Mitchell	0094	6/1/2018
Lee, Dennis	0095	5/22/2018
Levin, Barbara	0096	5/21/2018
Lowis, Ross	0098	Not dated
Lund, June	0099	5/1/2018
Lura, Gavin	0100	6/11/2018
Lyons, John	0101	6/11/2018
Mancusuo, Ciro	0105	5/30/2018
Maner, Doug	0106	5/23/2018
Manzi, Edward	0107	5/23/2018
Manzi, Edward	0108	5/3/2018
Mazerall, Carol	0110	6/10/2018
McCarty, Cheri A	0112	5/2/2018
Menlove Chador, Sharla	0113	6/6/2018
Meyer, Haley	0114	5/21/2018
Miles, Roger D.	0115	5/10/2018
Mirczak, Jareb	0116	6/7/2018
Mixon York, Christine	0117	Not dated
Mounier, Jaques	0118	5/26/2018
Murray, Jill	0119	5/28/2018
Murray, Peter	0120	5/28/2018
Nashner, Michael	0121	6/11/2018
Nelson, Walter	0122	5/18/2018
Nogueeira, Francisco	0123	5/18/2018

Table 1-1 List of Commenters

Commenter	Letter #	Date of Comment
Ogden, Barb	0124	6/8/2018
Owen, Graham	0125	5/18/2018
P, Carolyn	0126	5/12/2018
Padla, Dennis	0128	5/18/2018
Parrott, Greg	0129	6/11/2018
Patrick, Scott	0130	6/5/2018
Pavese, Robert	0131	5/19/2018
Pearson, Lara	0132	6/11/2018
Peltier, Michelle	0133	6/8/2018
Peters, Evan	0134	5/20/2018
Pilcher, Eric	0136	6/11/2018
Pitbladdo, Karen	0137	5/10/2018
Pollock, Carol	0140	5/22/2018
Pollock, Carol	0141	5/22/2018
Poulsen, Eric	0142	6/11/2018
Quinn, Pamela	0145	6/11/2018
Reams, Russell	0146	6/11/2018
Reams, Rusty	0147	6/11/2018
Reed, Susan	0148	6/7/2018
Reed, Susan A.	0149	6/7/2018
Riddle, Roxanne	0150	5/22/2018
Roghers, Helga	0151	6/10/2018
Rules, Driver	0152	5/26/2018
Russell, Bill	0153	5/19/2018
Samowitz, MD, Harvey	0155	5/23/2018
Sansone, Glenna	0156	6/8/2018
Schmid Maybach, Catherine	0157	6/8/2018
Schmid-Maybach, Ulrich	0158	6/1/2018
Schneider, Dana	0159	6/11/2018
Schneider, David	0160	6/11/2018
Scoglio, Ron	0161	5/25/2018
Self, Michael	0162	5/18/2018
Seybold, Bruce	0163	6/10/2018
Shannon, Dane	0164	6/11/2018
Shellito, Jeff	0165	6/10/2018
Smith, Evan	0168	5/30/2018
Smith, Jimmy	0169	6/3/2018
Smith, Joe	0170	6/1/2018
Speizer 1, Linda	0171	6/5/2018
Speizer 2, Linda	0172	6/5/2018

Table 1-1 List of Commenters

Commenter	Letter #	Date of Comment
Spent, James	0173	5/22/2018
Spent, Jim	0174	5/24/2018
Stach, Greg	0177	6/11/2018
Strauss, Aurthur	0178	6/5/2018
Tetrault, Robert	0180	6/11/2018
Topping, Phillip	0181	5/19/2018
Tornese, Judith	0182	6/8/2018
Tuscany, Roy	0183	Not dated
Tweddale, Jeff	0184	5/23/2018
Vanpernis, Jessica	0186	5/18/2018
Vastine, Tricia	0187	5/30/2018
Vaupen, Scott	0188	5/31/2018
Waller, Ellie	0190	5/24/2018
Walters, David	0191	5/10/2018
Wertheim, Rick	0192	5/18/2018
Wetheim, Andy	0193	5/22/2018
Wexler, Ryan	0194	Not dated
Wilcox, John	0195	5/10/2018
Willette, Carolyn	0196	6/5/2018
Willis, Marilyn	0197	5/25/2018
Wirth, Russell	0198	5/18/2018
Yoder, Robert	0199	5/4/2018
Ziegler, David	0201	Not dated
Ziegler 2, David	0202	6/11/2018
Public Hearing on the Draft EIS/EIR		
Various commenters at the Placer County Planning Commission Hearing	0138	5/24/2018
Late Comments		
Ballard, Annie	0010	6/12/18
Chillemi, Megan	0032	6/22/18
Gentry, Judi	0060	6/19/18
Grassi, Sally	0065	6/12/18
Hodges, Mitzi	0078	6/12/18
Mackenstadt, Barbara	0102	6/12/18
Poulsen, Glen	0143	6/13/18
Sajdak, Jim	0154	6/13/18

Chapter 2 contains the comment letters received during the public review period for the Draft EIS/EIR (as well as those received within two weeks of the close of the public review period), including transcribed comments received during the May 24, 2018 public hearing, and the responses to those comments. In conformance with NEPA and CEQA, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIS/EIR.

The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are shown on the left-hand side of the page. Responses are shown on the right-hand side of the page. Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

1.6 PROJECT MODIFICATIONS AND CLARIFICATIONS

This section presents minor modifications to and clarifications of the Squaw Valley | Alpine Meadows Base-to-Base Gondola Project as a result of ongoing planning and design refinements since publication of the Draft EIS/EIR. The information contained within this section clarifies and expands on information in the Draft EIS/EIR and does not constitute “significant new information” requiring recirculation.

1.6.1 Gazex Avalanche Mitigation System – Removal from Project

Since publication of the Draft EIS/EIR, the originally proposed Gazex avalanche mitigation has been removed from all action alternatives for this project. Instead, the applicant proposes a continuation of the existing avalanche mitigation system already in use in the project vicinity, which includes the use of hand-charges, Avalaunchers, and Gazex facilities at Squaw Valley; and the use of hand-charges, Avalaunchers, Gazex facilities, and 105-millimeter (mm) howitzer artillery at Alpine Meadows. Each of these avalanche hazard mitigation methods is described in Section 4.6, “Public Safety,” of the Draft EIS/EIR. For further discussion regarding why Gazex was removed from the project, see Section 1.8, “Master Responses,” below.

The primary environmental resources affected by this project change are public safety and noise.

While the removal of Gazex from the project would not introduce any new public safety concerns, this change would result in the alteration of NEPA effects conclusions provided for Impact 4.6-1 (Health and Safety) and 4.6-2 (Operations Efficiency) for all action alternatives. These changes are summarized below:

- ▲ NEPA effects conclusions provided for Impact 4.6-1 (Health and Safety) were changed from “minorly beneficial” to “no effect” for all action alternatives. These changes were made because the Gazex facilities would have allowed for avalanche hazard mitigation work to be performed remotely, thereby reducing the risk to snow safety personnel associated with the use of hand-charges; however, snow safety personnel at Alpine Meadows remain more than capable of effectively conducting avalanche hazard mitigation with existing technologies and training, as has historically occurred at the two resorts. The CEQA conclusions were not changed: this impact would be less than significant for all action alternatives.
- ▲ NEPA effects conclusions provided for Impact 4.6-2 (Operations Efficiency) were changed from “minorly beneficial” under Alternative 2 and “beneficial” under Alternatives 3 and 4 to “minorly adverse” for all action alternatives. These changes were made because the Gazex facilities would have allowed for remote avalanche hazard mitigation work to be performed during the night and inclement weather cycles, which may have resulted in the more timely, consistent, and cost-effective opening of avalanche prone terrain at Alpine Meadows. Without Gazex, however, Alpine Meadows snow safety personnel would lose certain 105-mm howitzer shot placements as options for avalanche hazard mitigation with the *Buttress* area, because fragmentation resulting from the impact of artillery shots could potentially damage proposed gondola infrastructure, creating potential health and safety and operational issues. To ensure that these potential issues would not arise, implementation of any of the action alternatives would require the elimination of these 105-mm howitzer shot placements as options for avalanche hazard mitigation within the *Buttress* area (7 shot placements would be eliminated under Alternative 2; 2 shot placements would be eliminated under both Alternatives 3 and 4). Even with the elimination of these 105-mm howitzer shot placements, avalanche hazard mitigation would still be effectively

accomplished with existing technologies. No CEQA conclusions were made for this impact as it is specific to a NEPA analytical indicator and is not responsive to a CEQA threshold of significance.

The removal of Gazex would not appreciably change the generation of noise or vibration during project construction (Impacts 4.9-1 and 4.9-2). Operational noise would be reduced because noise would not be generated by the Gazex exploders; however, operational noise would still be generated from the proposed gondola and associated equipment (Impact 4.9-3) and transportation noise sources (Impact 4.9-4). Overall, the noise impacts and mitigation needs (including Resource Protection Measures [RPMs]) identified for the project as a whole in the Draft EIS/EIR remain essentially the same.

Because this Final EIS/EIR did not result in the identification of any new significant environmental impacts or a substantial increase in the severity of an environmental impact, this Final EIS/EIR does not contain “significant new information,” and recirculation of the Draft EIS/EIR is not required prior to approval.

1.6.2 Proposed Red Dog Terminal Location

This section clarifies the location of the existing Red Dog lift terminal and the proposed Squaw Valley base terminal under Alternative 4.

EXISTING TERMINAL LOCATION

Chapter 2, “Description of Alternatives,” of the Draft EIS/EIR (see page 2-27) describes that under Alternative 4, the proposed Squaw Valley base terminal and the existing Red Dog lift terminal would be located at the same site, which could require an alteration:

...The Squaw Valley base terminal would be located in a slightly different location than the other alternatives, on or adjacent to the existing Funitel terminal (see Exhibit 2-17). The alignment of the existing Red Dog lift terminal may need to be altered to accommodate the Squaw Valley base terminal...

This text has been modified in the Final EIS/EIR to better reflect the Alternative 4 proposal and now reads:

...Under Alternative 4, the Squaw Valley base terminal would be located in a slightly different location than under the other action alternatives (see Exhibit 2-15). The Red Dog lift terminal and the Squaw Valley base terminal would be co-located in the same disturbance area as shown in Exhibit 2-15....

The applicant has confirmed that this co-location can be achieved within the “Squaw Valley Base Terminal Disturbance Area” shown on Draft EIS/EIR Exhibit 2-17 (now numbered Exhibit 2-15 in the Final EIS/EIR) and used in the Draft EIS/EIR analysis. Thus, the disturbance area described and analyzed in the Draft EIS/EIR is correct, and no expansion or modification of this area is needed.

While the co-location of these terminals has not yet been designed, the applicant has reviewed the information that is currently available and has confirmed that whether the terminals are “stacked” or installed side-by-side, co-location is technically feasible and within the identified disturbance area.

PROPOSED MODIFICATION

The Draft EIS/EIR identifies the Squaw Valley Red Dog Lift Replacement in the list of cumulative effects projects (see Table 3-3 and Exhibit 3-1). This project would include replacing the existing Red Dog triple chairlift with a high-speed, detachable, 6-person chairlift. The project was approved in 2013, but was on hold (as of Draft EIS/EIR publication).

Since publication of the Draft EIS/EIR, the applicant has submitted an application to the County for a modification to the conditional use permit that proposes to relocate the bottom terminal and tower alignment to the east. This is a separate permit/approval that may be put before, and decided upon, by the Placer County Planning Commission following release of the Final EIS/EIR.

1.7 SUMMARY OF REVISIONS TO THE DRAFT EIS/EIR

This section summarizes the revisions to the Draft EIS/EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. The information contained within this section clarifies and expands on information in the Draft EIS/EIR and does not constitute “significant new information” requiring recirculation.

Changes made to the Final EIS/EIR after publication of the Draft EIS/EIR include but are not limited to:

- ▲ the removal of Proposed Action text identifying and explaining the Gazex facilities component of the project, as well as any mention of new Gazex facilities throughout the resource analysis sections;
- ▲ the modification of effects analysis that was initially conducted with the assumption that Gazex facilities would be included in the proposal;
- ▲ clarification and enhancement of several RPMs reflecting input provided by the U.S. Fish and Wildlife Service during the Tahoe National Forest’s Endangered Species Act consultation for Sierra Nevada yellow-legged frog;
- ▲ various edits made in response to detailed public comments submitted during the Draft EIS/EIR public comment period; and
- ▲ other, minor edits related to syntax or grammatical errors throughout the document.

Identifying revisions with vertical lines in the margin was not possible for exhibits, so this paragraph summarizes the revisions made to the exhibits. The primary reason for revising exhibits was to remove reference to Gazex exploders and their related features. Exhibit 2-7, “Typical Gazex Exploder,” and Exhibit 2-8, “Typical Gazex Shelter,” were removed, and the remaining exhibits in Chapter 2 were renumbered accordingly. The following exhibits were retained, but elements and text referring to Gazex exploders and related features were removed (numbering reflects removal of Exhibits 2-7 and 2-8):

- ▲ Exhibit 1-2, “Gondola Alignments Associated with Each Alternative”
- ▲ Exhibit 2-1, “Topographic Map of Gondola Alignment Associated with Each Action Alternative”
- ▲ Exhibit 2-2, “Overview of Gondola Alignment and Construction Access Route under Alternative 2”
- ▲ Exhibit 2-3, “Close-up of Alpine Meadows Base Terminal under Alternative 2, along with Tower Zones A and B”
- ▲ Exhibit 2-4, “Close-up of Alpine Meadows Mid-Station under Alternative 2, along with Tower Zones B and C”
- ▲ Exhibit 2-7, “Overview of Gondola Alignment and Construction Access Route under Alternative 3”
- ▲ Exhibit 2-8, “Close-up of Alpine Meadows Base Terminal under Alternative 3”
- ▲ Exhibit 2-11, “Overview of Gondola Alignment and Construction Access Route under Alternative 4”
- ▲ Exhibit 2-12, “Close-up of Alpine Meadows Base Terminal under Alternative 4”

- ▲ Exhibit 3-1, “Cumulative Projects”
- ▲ Exhibit 4.2-3, “Viewpoint Locations”
- ▲ Exhibit 4.3-1, “Tower Construction Overview”
- ▲ Exhibit 4.4-1, “Forest Plan Management Areas in the Project Area, including Management Area 086 – Scott (Scott Management Area)”
- ▲ Exhibit 4.4-2, “Existing Local Land Use Designations”
- ▲ Exhibit 4.4-3, “Existing Local Zoning Designations”
- ▲ Exhibit 4.9-1, “Existing Noise and Vibration Sensitive Land Uses and Proposed Project Components”
- ▲ Exhibit 4.14-1, “Aquatic Resources in the Study Area”
- ▲ Exhibit 4.14-2, “Sierra Nevada Yellow-Legged Frog Critical Habitat in the Study Area”
- ▲ Exhibit 4.15-1, “Wetland Habitats”
- ▲ Exhibit 4.16-1, “Topography of Project Area”
- ▲ Exhibit 4.16-3, “Geology of Project Area”
- ▲ Exhibit 4.16-4, “Soils of Project Area”
- ▲ Exhibit 4.17-2, “Hydrology Features”

1.8 MASTER RESPONSES

Several comments raised similar issues. Rather than responding individually, a master response has been developed to address the comments comprehensively. A reference to the master response is provided, where relevant, in responses to the individual comment.

1.8.1 Gazex Removal

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. Specifically, Squaw Valley Ski Holdings LLC (SVSH) has withdrawn their proposal to install/operate Gazex infrastructure for avalanche/snow safety mitigation at Alpine Meadows. At this time, the installation of the proposed gondola connecting the Squaw Valley and Alpine Meadows base areas is the highest priority for SVSH. The analysis provided in the Final EIS/EIR reflects this change in the proposal.

Existing avalanche/snow safety mitigation techniques, utilized by snow safety personnel at Alpine Meadows, including use of hand-charges, avalaunchers, protected ski cutting, and the 105-mm Howitzer, provide effective and efficient means for reducing avalanche risk at the resort to a level that is effective and efficient. Omission of the originally proposed Gazex facilities from the overall project proposal will not create operational inefficiencies for snow safety personnel at Alpine Meadows.

Implementation of the action alternatives will result in the need to modify the use of the existing 105-mm Howitzer because shell detonations at some of the existing shot placement sites could risk damage to the gondola. For Alternative 2, there are seven existing 105-mm howitzer shot placements at Alpine Meadows where fragmentation resulting from the impact of artillery shots would potentially damage proposed gondola infrastructure. To ensure that no damage from fragmentation would occur, implementation of Alternative 2 would require the removal of these seven existing 105-mm howitzer shot placements as options for avalanche mitigation at Alpine Meadows. With these seven 105-mm howitzer shot placements removed, and Gazex not included as part of the project, avalanche mitigation under Alternative 2 would be accomplished at these locations through the use of hand charges and avalaunchers, which are authorized under the current Ski Area Permit and the Alpine Meadows Operating Plan.

For Alternatives 3 and 4, two existing 105-mm howitzer shot placements (the same two for both alternatives) could result in artillery shot fragmentation that could potentially damage proposed gondola infrastructure. Like for Alternative 2, implementation of Alternative 3 or 4 would require the removal of these two existing 105-mm howitzer shot placements as options for avalanche mitigation at Alpine Meadows. With these two 105-mm howitzer shot placements removed, and Gazex not included as part of the project, avalanche mitigation under Alternatives 3 and 4 would be accomplished at these locations through the use of hand charges and avalaunchers, which are authorized under the current Ski Area Permit and the Alpine Meadows Operating Plan.

1.8.2 Improvements to Existing Shuttle System Alternative

Several comments express a preference for improvements to the existing Squaw to Alpine intra-resort shuttle system rather than construction of a gondola. Section 2.3.2.1, “Improvements to Existing Shuttle System Alternative,” in the Draft EIS/EIR evaluates a potential alternative to the project that would involve improving the existing shuttle system and expanding it to provide enhanced access between the ski resorts. Comments also request further analysis of this alternative, or question the conclusions in the EIS/EIR related to this alternative.

The Improvements to the Existing Shuttle System Alternative is evaluated in Section 2.3.2.1 of the Draft EIS/EIR. Under this alternative, the fleet of shuttle vehicles would be expanded (types, sizes, fuel sources, user amenities) and the timing, location, and scheduling of the route could potentially be changed and shortened. This alternative was eliminated from detailed analysis in the EIS/EIR because it would not adequately meet the purpose and need. As described in Section 1.3.1, “Forest Service Purpose and Need,” project need is based on improving connectivity between Alpine Meadows and Squaw Valley. Based on the low existing shuttle system use, continuing to rely on a shuttle system would not achieve the desired improvements in connectivity. A review of intra-resort shuttle ridership data for the 2011/2012 to 2016/2017 winter seasons indicates that, on average, 41,675 persons rode the shuttle one-way each season. When accounting for roundtrip ridership, the average over these five seasons is approximately 21,880 guests per season. This represents about 2.7 percent of total downhill snowsports visits during a given season at Squaw Valley and Alpine Meadows, combined. As identified on page 4.17-14 of the Draft EIS/EIR, the shuttle operates daily during the winter, every 20 minutes, from 8:30 a.m. to 4:30 p.m. This provides 24 round trip shuttle trips a day, or approximately 720 trips a month and 2,880 trips over four months (an abbreviated winter season). These conservative assumptions result in an average of approximately 7.6 passengers per trip, well below the 20+ passenger capacity of the shuttle busses; indicating that current shuttle capacity far exceeds demand.

This particularly low shuttle usage is an indicator that guests do not presently find it convenient and/or effective to shuttle between the two resorts (SE Group and RRC Associates 2018). Similar patterns of resort shuttle use are observed throughout the ski industry. Guests do not perceive time spent riding a shuttle bus to be part of their recreation experience, whereas, time spent on a lift, even if the lift is simply a transit conveyance, is perceived to be part of their skiing day. Therefore, an improved shuttle system would not

achieve meaningful increases in ridership, and therefore, would not achieve the purpose of improving connectivity between Alpine Meadows and Squaw Valley.

The Improvements to Existing Shuttle System Alternative also would not meet the CEQA objectives of reducing visitor and resort shuttle system travel on roadways between the resorts; providing opportunities for skiers to offload at mid-stations to provide easier access to existing skiable terrain; and providing a gondola system where segments could be operated independently and function as a ski lift if the remainder of the gondola is not operational because of weather, maintenance, or other factors.

In addition, implementation of the Improvements to Existing Shuttle System Alternative is functionally identical to the No Action Alternative, as this alternative would require no analysis or permitting by the Forest Service or Placer County. SVSH is presently in a position to make any operational changes to the resort shuttle system it might deem appropriate. Therefore, considering this alternative as an action alternative in the Final EIS/EIR is not necessary.

Some comments also expressed the opinion that the inclusion of the Existing Shuttle System Alternative in the category of “alternatives considered but not evaluated further” was indicative of an overall deficiency in the consideration and evaluation of alternatives in the Draft EIS/EIR. In September 2015 and October 2015, the Forest Service and County, respectively, accepted applications from SVSH, the project proponent, to install, operate, and maintain an aerial ropeway system (gondola) connecting the Squaw Valley and Alpine Meadows ski areas. The Forest Service needs to respond to SVSH’s land use application, which proposes amendment of its special use permit to improve connectivity between Alpine Meadows and Squaw Valley. Placer County’s responsibility under CEQA is predicated upon the review of an application for a conditional use permit and *Squaw Valley General Plan and Land Use Ordinance* amendment. Thus, this applicant-proposed NEPA/CEQA analysis process is driven by the Proposed Action put forth by SVSH, as described in Section 2.2.2 of the Draft EIS/EIR. In response to issues identified internally by the Forest Service and Placer County, and externally by the public during the scoping process, a reasonable range of feasible alternatives was developed to meet most of the basic project objectives. The EIS/EIR analyzes in detail the No Action Alternative and three action alternatives. Additionally, four alternatives were considered but eliminated from detailed analysis. Strong indicators of impact differences between the action alternatives (Key Issues) are discussed in Section 2.4.1 of the Draft EIS/EIR. Section 2.3 provides additional information on alternatives considered but not evaluated further, including potential Improvements to the Existing Shuttle System. The Draft EIS/EIR provides an evaluation of alternatives that meets the requirements of both NEPA and CEQA.

1.8.3 Vehicle Trip Reduction Measures

Several comments on the Draft EIS/EIR addressed the topic of reducing vehicle trips to further mitigate project impacts related to traffic and transportation. Comments both questioned the effectiveness of mitigation provided in the EIS/EIR and provided additional suggestions for trip reduction measures. It was suggested that Mitigation Measure 4.7-11 does no more than provide a list of existing or planned trip reduction strategies, and that there are no identified performance standards that must be achieved. Additionally, it was stated that not all possible strategies to reduce impacts were considered as part of Mitigation Measure 4.17-11 (including additional funding for transit services).

Mitigation Measure 4.7-11 provides a performance standard in that it requires compliance with the Placer County Trip Reduction Ordinance. Although the Ordinance does not provide a specific trip reduction requirement, it does require that sufficient trip reduction measures be implemented to meet County standards.

The Draft EIS/EIR provides numeric performance standards in instances where project activities could be regulated in a way to achieve certain desired outcomes (e.g., the performance standards described on page 4.7-48 for construction impacts). Regarding the statement that “every available action must be implemented,” this is not accurate. Both NEPA and CEQA identify that actions to reduce environmental

effects must be feasible (e.g., CEQA Guidelines Section 15126.4). Comments suggested the idea of fixed route transit service to Alpine Meadows as a trip reduction measure; however, further analysis, which is described below, found this concept to be infeasible and therefore it should not be implemented, and funding towards its implementation should not be collected.

While it may be physically possible for Tahoe Area Rapid Transit (TART) service to be expanded to include a stop at Alpine Meadows Ski Area, such a diversion would add considerable travel time to the TART SR 89 route, which could potentially make the route less desirable for riders to use. As described by staff from the Placer County Department of Public Works (Garner, pers. comm., 2018), the TART Highway 89 Route operates with two buses on an hourly headway. Scheduled running times have each bus operating on a 2-hour cycle time. There is layover time built into the route to accommodate delays, which are commonplace in the winter.

The route makes timed connections on both the north and south terminus with other TART routes. Adding Alpine Meadows to the route would add approximately 4.2 miles on each run to drive up, and back down, Alpine Meadows Road. Alpine Meadows Road has a posted speed limit of 40 miles an hour, requiring a minimum of 13-15 additional minutes of running time under ideal conditions with no traffic or weather delays. Under heavy traffic or inclement weather conditions, travel times up and down Alpine Meadows Road could be substantially longer. In addition to making existing ride times unreasonably long, the added service would require the addition of another bus in service on the Highway 89 Route, which would be far more costly than the potential new ridership could justify. It also needs to be considered that the longer ride times will decrease ridership on the existing route for passengers currently travelling between Tahoe City, Squaw Valley, and Truckee. The 2016 *Systems Plan Update for the Tahoe Truckee Area Regional Transit in Eastern Placer County* (Placer County 2016) does not include any plans or proposals for TART service up Alpine Meadows Road.

Therefore, although physically possible, the adverse consequences of providing fixed route transit service to Alpine Meadows make it an undesirable measure and, therefore, infeasible.

Further, as noted on page 4.7-45 of the Draft EIS/EIR, any project-generated skiers that choose to ride TART to the Squaw Valley Ski Area could then ride the gondola to reach the Alpine Meadows Ski Area. In this scenario, the Gondola acts as a supplement to the existing fixed route transit service to Squaw Valley, providing those skiing at Squaw Valley/Alpine Meadows a “transit” connection between TART service to Squaw Valley and Alpine Meadows. For the reasons described above, expansion of transit to Alpine Meadows is not recommended as a mitigation measure in the EIS/EIR.

A comment suggests as a method to reduce gondola generated vehicle trips various potential strategies included in a mitigation measure to reduce criteria pollutant emissions from the Village at Squaw Valley Specific Plan (VSVSP) EIR (Mitigation Measure 10-2 from the VSVSP EIR). These strategies generally consist of: free/discounted transportation between the project site and the Amtrak Station in Truckee, discounted overnight/meal accommodations for travelers arriving by train or bus, free/discounted bicycle rentals, shuttle service to other key destinations in the region, covered bicycle parking, subsidized car-sharing service for resort employees or patrons, “end-of-trip” facilities for employees who bike to work, free/reimbursed transit passes, weather-protected bicycle lockers for employees, and providing virtual/real-time information in employee areas regarding carpool opportunities. The comment states that the above measures have been determined to be feasible; therefore, the County must require the applicant to adopt and implement enough of them to ensure that the gondola project’s impacts would be mitigated to a less than significant level.

It is important to note that no agency purports, and the VSVSP EIR does not purport, that the entire list of emission reduction options is feasible in all circumstances. The VSVSP EIR provides the list of emission reduction options, and identifies that it is feasible to implement sufficient options, as selected by the applicant and approved by the County, to reach criteria pollutant emission reduction objectives. Although some, or all, of the emission reduction options may prove to be feasible if the applicant chooses to attempt to

implement them; there is nothing in the record for the VSVSP EIR indicating that every emission reduction option provided to the applicant in Mitigation Measure 10-2 is feasible in all circumstances.

Furthermore, at this time, there is no way of knowing which of the options provided in Mitigation Measure 10-2 of the VSVSP EIR may be implemented by the applicant if/when the VSVSP moves forward. Therefore, there is no way of knowing if any of the measures would be “available” for the Gondola. If, for example, with implementation of the VSVSP, free, shared, or discounted rental bicycles are offered to all visitors staying in the hotel or resort residential units as a method to reduce criteria pollutant emissions, the mitigation benefit attributed to this action would be attributed to the VSVSP and not be available to the gondola project. It cannot be assumed that emission reduction actions listed in Mitigation Measure 10-2 are “available” for other projects or purposes. In fact, consistent with the Placer County Trip Reduction Ordinance, Squaw Valley and Alpine Meadows already implement several actions consistent with those listed in VSVSP EIR Mitigation Measure 10-2 including incentives for employees to use transit and providing local and regional shuttle services.

While some of the identified mitigation strategies in Mitigation Measure 10-2 appear to be potentially feasible, they are directed at reducing criteria pollutant emissions and their ability to actually mitigate traffic impacts is uncertain. Recommendations (and their corresponding expected degree of reductions in vehicle trips and vehicle miles of travel) from the California Air Pollution Control Officers Association (CAPCOA) are very general in nature, and lack context for their effectiveness in rural, recreational settings.

A comment questions whether Mitigation Measure 4.7-11 from the Gondola Draft EIS/EIR applies to the project because the Mitigation Measure references a Plan, and the gondola project is not a Specific Plan or other “plan”. Mitigation Measure 4.7-11 includes several transportation demand management (TDM) strategies that the project would implement on peak ski days to reduce vehicle trips. Mitigation Measure 4.7-4 begins with the statement “Prior to Improvement Plan approval, the applicant shall provide...”. The “Improvement Plan” is part of the Placer County permitting process. Many of the RPMs provided in Appendix B of the Draft EIS/EIR also reference the Improvement Plan, typically in the context of timing (i.e., prior to submittal of the Improvement Plan), or content (i.e., the Improvement Plan shall include). In the case of Mitigation Measure 4.7-11, the Improvement Plan is referenced to guide the timing of implementation of the Mitigation Measure; before Placer County can approve the Improvement Plans and allow the project to move forward, the necessary evidence identified in the mitigation measure must be provided to Placer County.

2 RESPONSE TO COMMENTS ON THE DRAFT EIS/EIR

This chapter contains copies of the comment letters on the Draft EIS/EIR received during the public review period, a copy of the transcript from the May 24, 2018, public hearing, and responses to the comments. Comments received within 2 weeks of the close of the public review period are also included, along with responses to those letters.

The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are shown on the left-hand side of the page. Responses are shown on the right-hand side of the page. Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter. Letter numbers (e.g., 0109, 0185) correspond to the letter numbers provided in Table 1-1, “List of Commenters.”

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0109



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUN 08 2018

Eli Ilano, Forest Supervisor
Tahoe National Forest
631 Coyote Street
Nevada City, CA 95959

Subject: Draft Environmental Impact Statement/Environmental Impact Report for the Squaw Valley Alpine Meadows Base-to-Base Gondola Project, Tahoe National Forest. (EIS No. 20180070)

Dear Mr. Ilano:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Squaw Valley Alpine Meadows Base-to-Base Gondola Project. Our review is provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. EPA supports the Forest Service and Placer County's decision to produce a combined EIS/EIR to facilitate efficiency of the public comment and decision-making process.

0109-1

Based on our review of the DEIS, we have rated all Alternatives as *Lack of Objections* (LO) (see enclosed "Summary of Rating Definitions"). The document is well written and provides useful analyses of impacts to important resources in the project area. We suggest that the Final EIS provide more information about the cumulative impacts associated with the planned Rollers Chair ski lift, as it is a reasonably foreseeable project under Alternative 2. Specifically, we suggest that the Forest Service disclose the impacts of new lift and trail construction, grading, tree removal, and associated snowmaking on south-facing slopes in the proposed 110 acres of lift-accessible terrain in the Estelle area, particularly with respect to the potential for erosion and other water quality impacts.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released, please send one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or contact Stephanie Gordon, the lead reviewer for this project, at 415-972-3098 or gordon.stephanies@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Section (ENF-4-2)

Enclosure: Summary of the EPA Rating System

cc via email: Joe Flannery, Tahoe National Forest jflannery@fs.fed.us

0109-1, Cumulative Effects (CE)

The lead agencies appreciate the thorough review of the Draft EIS/EIR provided by the U.S. EPA and acknowledge their comments.

The Rollers lift is a planned, but unpermitted and unimplemented, chairlift (proposed as part of the Alpine Meadows Master Development Plan). Its bottom terminal would be near the Alpine Meadows mid-station under Alternative 2 (meaning that under Alternative 2, skiers could exit the gondola at the Alpine Meadows mid-station and ski/walk to the Rollers lift). The Rollers lift is included in the Draft EIS/EIR's list of cumulative projects (see Table 3-3 and Exhibit 3-1; see Alpine Meadows Master Development Plan, map label 1). Cumulative effects of the project in connection with other probable future projects (including the Rollers lift) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR. Specifically, potential cumulative impacts related to erosion and water quality are discussed in Sections 4.16.4.2 and 4.17.4.2, respectively. However, the cumulative effects analysis prepared for all environmental topic areas consider all applicable cumulative projects listed in Table 3-3 of the EIS/EIR. As the Rollers Lift is, at this time, simply a planned project included in the Alpine Meadows Master Development Plan, little detail regarding the project is available. To create a detailed project plan would require considerable speculation. At this time, it would be pre-mature to provide additional detail regarding topics such as grading, tree removal, and snowmaking that could be associated with the Rollers Chair. However, this does not affect the adequacy of the cumulative effects analysis provided in the EIS/EIR.

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

0185

Will Hollo

From: vanDiepen, Elizabeth@Waterboards <Elizabeth.vanDiepen@waterboards.ca.gov>
Sent: Monday, June 11, 2018 5:31 PM
To: cdraecs@placer.ca.gov; Scoping Comments
Cc: Judge, Brian@waterboards; Tucker, Robert@Waterboards
Subject: Comments on the Squaw Valley/Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR

Dear Ms. Herrington,

Thank you for the opportunity to provide comments on the Squaw Valley/Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR in Placer County's April 27, 2018 public notice. The Water Board's mission is to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations. Squaw Valley Ski Holdings (SVSH) is proposing to construct a gondola connecting the base areas of Alpine Meadows and Squaw Valley including two mid-stations and a terminal at each base. SVSH also proposes to install eight Gazex avalanche mitigation exploders and four shelters. In addition to the Water Board's comments on the project scoping document, see comments below.

401 Water Quality Certification

- 0185-1 | - As noted in the Draft EIR, Squaw Creek is on the 303(d) list as impaired due to sedimentation. Total Maximum Daily Load (TMDL) has been established, and all loads are currently allocated. Any additional sediment load would be unacceptable. See Section 4.13-17 of the Water Quality Control Plan for the Lahontan Region (Basin Plan) for details.
- 0185-2 | - The Basin Plan includes in Section 4.1-16 a prohibition of waste discharge to surface waters of the Truckee River Hydrologic Unit, which includes all surface waters within the project study area. In order to permit discharge of waste to any surface waters within the project area, we would need to meet exemption criteria and make findings.
- 0185-3 | - Wetlands should be avoided to the extent feasible. If impacts to wetlands are unavoidable, SVSH shall minimize impacts as much as possible. All unavoidable impacts must be mitigated. Due to the high functional value of upper-elevation wetlands, higher mitigation ratios would be required. Mitigation should be on-site and in-kind. Success criteria would be critical to approval of permittee-responsible mitigation.

NPDES Statewide Construction General Permit

- 0185-4 | - The statewide construction general permit (and associated monitoring requirements) would remain active until final stabilization is achieved. Risk Level should be calculated to include time taken to achieve final stabilization.
- 0185-5 | - Construction season at high elevations is dependent on weather and soil saturation. Soil disturbance could last longer than the anticipated one season. The draft EIR cites the end of the grading season on October 15 but fails to mention a May 1 start.
- 0185-6 | - Grading should be scheduled to minimize the area of disturbed soil at any given time. All disturbed areas should have effective soil cover within 14 days of inactivity or upon finished grading.

General Comments

- 0185-7 | Exhibit 4.12-1 does not clearly show activity associated with each alternative.

Please let me know if you have any questions on the comments above.

Best Regards,
 Liz van Diepen
 North Basin Regulatory Unit

0185-1, Hydrology and Water Quality (H&WQ)

This comment give the regulatory requiremetns associated with the Squaw Creek TMDL. Potential sediment loading from the project is analyzed in Section 4.17 of the EIS/EIR. These impacts identify the requirement to conform with regulatory requirements of Section 404 of the Clean Water Act (CWA), and federal NPDES programs established under Section 401 and 402 of the CWA. Construction or development is not precluded if such development remains compliant with the appropriate standards, in this case the Squaw Creek TMDL.

The impact analysis in Section 4.17 also identifies necessary compliance with other USFS and Lahontan requirements, as well as Resource Protection Measures (RPMs) proposed by the applicant. The provisions of the RPMs are sufficiently effective at preventing sedimentation to be consistent with the TMDL standard for Squaw Creek.

0185-2, Hydrology and Water Quality (H&WQ)

This comment refers to page 4.1-19 of the Lahontan Basin Plan, which identifies that no discharge of waste or deleterious substance is permitted into the Truckee River Hydrologic Unit without an exemption. The project does not propose any discharges of waste or deleterious substance to the Truckee River or tributaries. The RPMs are designed to minimize the potential for releases of sediment, waste or other substances.

0185-3, Hydrology and Water Quality (H&WQ)

0185

This comment states that wetlands should be avoided, but that if it is not feasible to do so, wetland replacement must occur with high replacement ratios due to the sensitivity of the high alpine environment in which this project is located, and that mitigation must be on-site and in-kind.

Section 4.15, "Wetlands," of the Draft EIS/EIR details specific regulatory requirements and protections that the applicant has committed to regarding wetland replacement and compensation. Specifically, page 4.15-11 states, "RPM BIO-26 requires that aquatic habitats are avoided to the extent feasible, and if they cannot be avoided, a delineation report be prepared to quantify the aquatic habitats in the area to be disturbed. All permanent impacts will be mitigated according to USACE's no-net-loss policy (i.e., no net loss in both function, value, and quantity). The mitigation ratios required by the USACE when mitigating high value wetlands typically require mitigation ratios above 1 -to-1. RPM BIO-35 requires that a wetland report is submitted to USACE and CDFW for verification. RPM BIO-36 requires that compensation for loss of wetlands shall be provided by purchase of mitigation credits at a qualified mitigation bank, or constructed and/or restored at an off-site location acceptable to the regulatory agencies, or a combination thereof, and such that the constructed or restored wetland meets the no-net-loss requirement." The comment's prioritization of wetland avoidance is consistent with the project implementation approach in the Draft EIS/EIR, and the Lahontan Regional Water Quality Control Board (LRWQCB) can further express priorities as far as mitigation for unavoidable wetland effects through required permitting processes.

0185-4, Hydrology and Water Quality (H&WQ)

0185

This comment identifies the provision of the statewide construction general permit that requires coverage until final stabilization of the site. The project would proceed in compliance with all provisions of all applicable permits or other project-related authorizations, including the provision of the General Permit for Storm Water Discharges Associated with Construction Activity (General Permit) that identifies that a project site is subject to the provisions of the General Permit until final stabilization is complete. Note that various RPMs provide monitoring of revegetation/stabilization efforts to confirm that success criteria are met, including RPMs BIO-32, BIO-39, SOILS-4, and SOILS-9.

0185-5, Hydrology and Water Quality (H&WQ)

This comment states that despite the construction season window of May 1 to October 15, that construction operating periods may be further limited depending on conditions, and that it is possible for project construction to last for more than one season. The Stormwater Pollution Prevention Plan (SWPPP), prepared for compliance with the General Permit, would contain provisions that limit the maximum duration of the construction season to between May 1 and October 15, contingent on weather conditions. While the anticipated construction period for the project would be the period between May 1 and October 15, these dates serve as sideboards for the typical dry season, and construction may be further limited depending on weather and soil saturation, as the comment suggests. Various RPMs acknowledge and respond to the fact that changing weather and soil conditions may limit the ability to implement construction activities including RPMs SOILS-5 and SOILS-10,

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which specifically references LRWQCB criteria. Also, not all construction activity need be limited to the period between May 1 and October 15 to be protective of water quality; for example, work on interior walls of base-terminals. Therefore, the language of the RPMs focusses on ground disturbing activities to make a distinction between construction activities that may affect water quality, and those that would not. The project applicant has committed to completing all ground disturbance in a single construction season, as identified and required in RPM MUL-7. On multiple occasions the applicant has expressed confidence in being able to successfully meet this requirement.

0185-6, Hydrology and Water Quality (H&WQ)

This comment states that during grading, the area of disturbance should be minimized, and that upon completion of grading, effective soil cover should be replaced on the area of disturbance within 14 days.

Appendix B of the Draft EIS/EIR includes RPM REV -2, which states that, "the plan or SWPPP shall also include a list of applicable permits directly associated with the grading activity, including, but not limited to the State Water Board's Construction General Plan, State Water Board 401 Water Quality Certification, U.S. Army Corps 404 permit, and California Department of Fish and Wildlife 1600 Agreement. The applicant shall submit evidence to the County that all permits directly associated with the grading activity have been obtained prior to Improvement Plan Approval." The applicant would adhere to all provisions of the abovementioned permits, and all other permits issued for the project, including those that are related to grading. In addition, beyond the references in various RPMs to

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complying with LRWQCB permits and standards identified previously, RPMs REV-3, BIO-26, BIO-35, WQ-1, and WQ-18 each require either coordination with or authorization from LRWQCB or compliance with LRWQCB permits or standards.

0185-7, Hydrology and Water Quality (H&WQ)

This comment states that Exhibit 4.12-1 does not clearly show the area of activity under each alternative. The Draft EIS/EIR does not contain an Exhibit 4.12-1. The alternatives are described in Section 2.2, and Table 2-2 gives estimated ground disturbance by alternative. Sections 4-15, 4-16, and 4-17 provide additional information on disturbance to wetlands, soils, and ground disturbance. Estimated construction disturbance areas are shown in Exhibit 4.15-1, "Wetland Habitats." The legend in this exhibit has been updated to better indicate that construction disturbance areas, rather than survey areas or alignment corridors, are shown.

Lahontan Regional Water Quality Control Board
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
(530) 542-5492
elizabeth.vandiepen@waterboards.ca.gov



STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 3
703 B STREET
MARYSVILLE, CA 95901
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www.dot.ca.gov



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May 21, 2018

GTS# 03-PLA-2018-00207
03-PLA-089 PM Var
SCH# 2016042066

Shirlee Herrington
Placer County
3091 County Center Drive
Auburn, CA 95603

Squaw Valley-Alpine Meadows Base-to-Base Gondola Project

Dear Shirlee Herrington:

Thank you for including the California Department of Transportation (Caltrans) in the environmental/application review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

The project includes installation, operation, and maintenance of a winter-time only/ski season only gondola connecting the Squaw Valley and Alpine Meadows ski areas. The eight-passengers-per-cabin gondola would have a design capacity of approximately 1,400 persons per hour in each direction. Travel time between the ski areas is approximately 16 minutes. In total, the lift would be approximately 13,000 ft in length (based on slope length). Two base terminals, two mid-stations, and 37 towers would be installed. The project would also include the installation, operation, and maintenance of an avalanche control system within proximity to the Alpine Meadows portion of the gondola alignment. The avalanche control system would consist of remotely operated gas-activated exploders (Gazex exploders). The following comments are based on the Mitigated Negative Declaration (MND) received.

Encroachment Permit

Any project or mitigation along or within the State's Right-of-Way (ROW), including above and below, requires an encroachment permit that is issued by Caltrans. To apply, a completed

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability"

0200**0200-1, Transportation and Circulation/Traffic and Parking (T&C/T&P)**

At this time, a Caltrans encroachment permit is not anticipated to be required for project implementation. Encroachment permits from the Placer County Department of Public Works and Facilities, however, would be required (see Mitigation Measures 4.7-2, 4.7-7, and 4.7-9 in the Draft EIS/EIR). The project applicant will coordinate as needed with Caltrans regarding any necessary authorizations.

0200-1

0200

0200-1 cont'd, Transportation and Circulation/Traffic
and Parking (T&C/T&P)

0200-1
cont'd

Ms. Shirlee Herrington, Placer County
May 21, 2018
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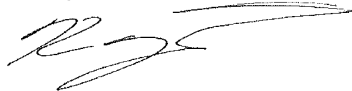
encroachment permit application, environmental documentation, and five sets of plans clearly
indicating State ROW must be submitted to:

Moe Azar
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901

Please provide our office with copies of any further actions regarding this project. We
would appreciate the opportunity to review and comment on any changes related to this
development.

If you have any question regarding these comments or require additional information,
please contact David Smith, Intergovernmental Review Coordinator for Placer County, by
phone (530) 634-7799 or via email to david.j.smith@dot.ca.gov.

Sincerely,



KEVIN YOUNT, Branch Chief
Office of Transportation Planning
Regional Planning Branch—North

*"Provide a safe, sustainable, integrated, and efficient transportation
system to enhance California's economy and livability"*

0064

0064-1, NEPA/CEQA Process (NCP)

June 8, 2018

U.S. Forest Service, Tahoe National Forest, Truckee Ranger District
c/o NEPA Contractor
P.O. Box 2729
Frisco, CO 80443

Placer County Community Development Resources Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordination Services

SUBJECT: Comments on the SVAM Base-to-Base Gondola Project DEIS/EIR

The following comments are submitted on behalf of Squaw Valley/Alpine Meadows (SVAM), the applicant for the proposed SVAM Base-to-Base Gondola project.

0064-1

The Draft EIS/EIR contains a thorough, detailed and conservative analysis of the impacts of the SVAM Base-to-Base Gondola (project) under both NEPA and CEQA. In some cases, the DEIS/EIR is so conservative that it leaves the reader with the sense that the magnitude of certain impacts would be more severe than is actually likely to be the case. For example, the use of the terms **adverse** and **minorly adverse** does not appear to be applied uniformly. There are a number of impacts that are described as "minimal" or "minor" or that would be well below established standards, yet they are characterized as **adverse** rather than **minorly adverse**. A few examples include:

- Under the **NEPA Effects Conclusion** of Impact 4.9-3 (pages 4.9-23 for Alternative 2 and 4.9-34 for Alternative 4), the operational noise impact is found to be **adverse**, although "any increases in noise levels would be minor and would be consistent with the existing noise environment."
- Even more surprising, traffic noise is found to be **adverse**, even though "these increases would be below 0.5 dBA and *would be inaudible* (emphasis added) (Impact 4.9-4 on pages 4.9-24 and -25).
- Similarly, vibration from noise is found to be **adverse** in Impact 4.9-2, even though blasting activities would be temporary, would occur during times of day when people would be less likely to be disturbed, and *blasting locations would not be close to any existing residences* (page 4.9-20 for Alternative 2). Further, it states that all of the locations where blasting would occur for Alternative 2 would be more than 230 feet from existing residences, the threshold identified for vibration levels (page 4.9-20). In fact, residences are much farther than 230 feet from the potential blasting sites (see page 4.9-17, "two residential structures are located 750 feet east and 1,800 feet east of the proposed gondola alignment."). Similarly, under Alternatives 3 and 4, ground vibration levels from blasting would not exceed the thresholds (pages 4.9-28 and page 4.9-33). Because blasting would occur intermittently over a single season and would not exceed the

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Environmental and Planning Consulting Services
4533 Oxbow Drive, Sacramento, CA 95864

Because the Draft EIS/EIR is a joint document, both NEPA and CEQA conclusions were provided for each impact/effect. For NEPA, effects are described as "adverse" for detrimental or negative effects, "beneficial" for positive effects, and "no effect" for no change. As stated in the Draft EIS/EIR on page 3-6, "[f]or some NEPA effects conclusions, "minorly" is used to characterize adverse and beneficial effects (i.e., minorly adverse or minorly beneficial), in an effort to further distinguish the effects of the action alternatives." The comment is correct in that use of the word "minorly" may have been used inconsistently at times, as shown in the examples provided. As noted above, however, the main purpose of this impact conclusion is to distinguish the effects between the action alternatives, both for the readers and the decision-makers. Importantly, regardless of a "minorly adverse" or "adverse" impact conclusion, RPMs are identified to reduce these effects and, where RPMs would not be adequate to reduce the effects, additional mitigation measures are provided. In summary, all effects, regardless of the exact wording used for the effects conclusions, have been properly disclosed and mitigated as required by NEPA and CEQA. A summary of the effects conclusions (both before and after mitigation) of the alternatives is provided in Table ES-3 in the EIS/EIR.

0064-1 cont'd, NEPA/CEQA Process (NCP)

0064-1
cont'd

established threshold for vibration, this impact should be considered only **minorly adverse**.

- Impact 4.10-3 states that mobile source CO emissions would be **adverse**, even though no violations of CO thresholds are anticipated, and the study intersections would be very far below the vehicle volumes necessary to create such an impact. According to the DEIS/EIR, the SMAQMD uses a screening threshold of 31,600 vehicles per hour at a single intersection for CO emissions. The study intersections for the Gondola would not have more than 3,000 vehicles per hour in any peak hour, or less than 10% the volume needed to warrant consideration of CO violations. Similar to the GHG analysis (Impact 4.11-1), this conclusion under NEPA should be **minorly adverse** (or even **no effect**).
- A similar argument applies to the construction and operational air emission impacts, which would both be well below the applicable Air District thresholds (Impacts 4.10-1 and 4.10-2).
- Impact 4.12-1 addresses the loss of common vegetation, and states that this would be an **adverse** impact, even though the total acreages to be permanently lost would be small, and "would not substantially reduce the size, continuity, or integrity of any common vegetation or habitat type" (page 4.12-20). Given the abundance of these common habitat types, and the small acreages that would be affected by the alternatives, a finding of **minorly adverse** is more appropriate.
- Similarly, Impact 4.13-1 states that the disturbance of special-status botanical species would be **adverse**, even though none of these species were detected during protocol-level surveys, potential suitable habitat is very limited in amount and quality, and disturbances to these species, if present, would be minor both locally and regionally (page 4.13-13). The potential habitat that could be removed or disturbed is very small, particularly for Alternatives 2 and 3 (less than 0.5 acres).
- Impact 4.14-4 would have only a "slightly" adverse effect, and Impact 4.14-5 would be "minimal". Yet both of these impacts are designated **adverse** rather than **minorly adverse**.
- With respect to construction-related water quality impacts (Impact 17-1), as stated on page 4.17-29, there are "multiple layers of regulatory protections that the applicant and contractor(s) must abide by when executing construction activities." These regulations would minimize the likelihood of erosion and construction-related water quality degradation, even without the identified RPMs. Again, this impact should be considered **minorly adverse**.

By not using the term **minorly adverse** more consistently, the DEIS/EIR leaves the impression that the extent of many of the environmental effects are far greater than the actual analysis indicates. This is borne out by the CEQA conclusions, which clearly state when impacts would be less than significant or reduced to a less-than-significant level by RPMs and/or identified mitigation. For the CEQA analysis, almost every impact would be less than significant and/or mitigated to a less-than-significant level. This accurately reflects the magnitude of the project impacts relative to the identified thresholds.

We understand that there are differences between NEPA and CEQA, and between the approaches taken by the USFS and Placer County, that can lead to legitimate

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0064-1 cont'd	<p>differences in conclusions regarding the severity of impacts. Ideally, everyone would read through the entire text of an impact to fully understand its magnitude, and the extent to which RPMs and mitigation would offset the severity of an impact. But because not everyone has the time to read the full document, bold conclusions take on more weight, particularly in the summaries that appear after every impact statement.</p>
0064-2	<p>In addition, the summaries of direct and indirect effects at the end of each section in Chapter 4 report the significance finding prior to consideration of RPMs and mitigation, which leaves the reader with the sense that there are many more adverse impacts than would actually be the case. A more thorough and accurate approach is taken in Table ES-3, which indicates which adverse and minorly adverse impacts would be considered "mitigated".</p>
0064-3	<p>There are also several instances where specific impact analyses are overly conservative, and/or thresholds appear to be mis-applied, particularly with regard to changes in views, construction noise, traffic and avalanche risk, as discussed below.</p> <p><u>4.2 Visual Resources</u></p>
0064-4	<p>The Exhibits 4.2-4, 4.2-5 and 4.2-6 provide the "viewsheds" that are considered for each alternative. The text on page 4.2-14 explains that these viewsheds include all areas from which there could be a line of sight based solely on topography (obtained from LiDar). The text further explains that the viewshed analysis does not incorporate "potentially obscuring" features such as vegetation or existing structures. A viewshed analysis based on topography only would be a legitimate method of identifying potential areas for more detailed analysis, such as selecting locations for visual simulations. However, the viewsheds in the DEIS/EIR exhibits are overly conservative and, therefore, could be considered misleading when used to assess the magnitude of an impact and/or to compare the impacts of the alternatives. As evidenced by satellite imagery (cf, Google Earth), there are mountains and quite a bit of vegetation within the areas designated "visibility" on the exhibits, particularly in the Congressionally-mapped Granite Chief Wilderness.</p> <p>Exhibit 4.2-7, View of Alternative 4 from Lake Tahoe, demonstrates how "existing vegetation could greatly reduce the actual visibility" of Alternative 4 (page 4.2-42). Presumably, forested areas could obscure views of the alternatives from other sites within the "viewshed" area. A good example of how treed areas can obscure views are the photosimulations from Location 8, in which the gondolas for Alternative 4 seem to disappear into the forested area, in part because of a couple of relatively tall trees in the foreground. And, vegetation does not necessarily have to be very tall to obscure views. Trees and shrubs that are close to a viewer (e.g., along a trail), need only be 6 feet or taller to obscure views of anything beyond the vegetated area. Therefore, it is not accurate to say that, for example, Alternative 2 would be visible from approximately 17.99 square miles in the surrounding area (page 4.2-29) or compare the quantified "viewshed" area as a means to assess the relative effect on views of the alternatives (cf., page 4.2-36, "Visual impacts from these locations associated with Alternative 3 are less than those associated with Alternative 2; as indicated by the viewshed analysis, the gondola alignment associated with Alternative 3 would be potentially visible from approximately 16.04 square miles within the surrounding area..." [emphasis added]). The misleading use of the viewshed "area" is especially unnecessary given the use of</p>

0064-1 cont'd, NEPA/CEQA Process (NCP)

0064-2, NEPA/CEQA Process (NCP)

The comment is correct in that the summary tables of direct and indirect effects located in Sections 3.1 through 3.17 identify the NEPA effects determinations before mitigation. Table ES-3 identifies the NEPA effects determinations and CEQA impact conclusions both before and after mitigation. Also, see response to comment 0066-1, above, regarding impact conclusions.

0064-3, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0064-4, Visual Resources (VR)

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. They are also visible to a greater number of people traveling along the roads or from the base terminal. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which

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resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be, or were required to be, simulated for the purposes of this EIS/EIR. Instead, highly frequented or prominent public areas and visually sensitive vistas were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

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0064-4
cont'd

multiple photosimulations, and the qualitative evaluation of how the alternatives would affect views of ridgelines.

4.7 Traffic

0064-5

As discussed in more detail in the attached memorandum from Gordon Shaw of LSC (Attachment A), we have several concerns with respect to the transportation analysis. In summary:

- The methodology that yields the conclusion that 34 percent of additional exiting skier traffic exits during the Sunday PM peak-hour (see page 4.7-21) is overly conservative, so that the PM peak-hour traffic impacts could be too high by approximately 21 percent.
- The standards of significance for several intersections do not reflect the adopted Village at Squaw Valley Specific Plan (VSVSP) Policy CP-1, which states that during peak periods, LOS F is acceptable within the VSVSP area. Using the County's general standard of LOS C is conservative, particularly given that the VSVSP is currently under litigation. However, the DEIS/EIR should also recognize that the adopted standard for three intersections is LOS F.
- Similarly, the significance standards for traffic growth do not recognize that LOS F is acceptable in the Tahoe Basin within Town Center boundaries, pursuant to Tahoe Basin Area Plan policy.
- The discussion of transit impacts (Impact 4.7-6 and 4.7-14) does not consider the beneficial impacts that the Gondola could have on the regional transit system, which could allow skiers and employees to conveniently walk from the nearby TART stop to the Squaw Valley Gondola terminal to access Alpine Meadows.

4.9 Noise

0064-6

Impact 4.9-1 states that "construction could occur during times of day, or in a manner, outside those identified in the Placer County Noise Ordinance" (pages 4.9-15, 4.9-18, et al, but does not provide any evidence to support this statement. To the contrary, construction of the Gondola would be conducted in accordance with the applicable County ordinances.

Typically, the applicable standards of the governing jurisdiction are used to determine if a noise impact would be significant. Page 4.9-11 states that the County Code exempts construction noise performed between certain hours from its noise standards, and Impact 4.9-1 states that, "With implementation of these RPMs, construction activities would occur during times, and in a manner, consistent with the Placer County Noise Ordinance construction exemption" (page 4.9-18). The DEIS/EIR then goes on to conclude that helicopters used in construction would have a significant impact. As noted in the analysis, all construction would occur within a single season and helicopters would be used for 20 days at most. Further, unlike equipment used to construct a single building, the helicopters used during Gondola construction would not be operating for long periods of time in a single location. Therefore, sensitive receptors would be

0064-4 cont'd, Visual Resources (VR)

0064-5, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The first three bullet items in the comment provide a summary of detailed comments provided as Attachment A to this comment letter. See responses to comments 0064-18 through 0064-20, below, for detailed responses to these items.

Regarding the fourth bullet item, the comment is correct, the proposed Gondola could provide a mechanism for those taking transit (TART) to the existing stop at Squaw Valley to, in effect, use the Gondola as an extension of mass transit to access Alpine Meadows, which currently does not have a TART stop. Although having a more convenient connection between Squaw Valley and Alpine Meadows via the Gondola could conceivably provide an incentive for increased transit use to Squaw Valley, any increases in transit use attributable to this mechanism could not be easily quantified at this time. In addition, this potential mechanism for increased TART ridership would not alter impact conclusions in the EIS/EIR.

0064-6, Noise (N)

The comment suggests that the conclusion of the construction noise analysis on page 4.9-19 of the Draft EIS/EIR should be less than significant because helicopter use would be intermittent and temporary. However, helicopter flight paths and proximity to existing receptors were not known at the time of the analysis and will not be finalized until an alternative has been selected and a project design

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has been completed. Therefore, although helicopter use would be temporary, the helicopter does represent the loudest construction activity, as shown in Table 4.9-11, and due to the uncertainty of location and specific daily operations, could result in substantial noise levels at existing receptors. For these reasons, temporary construction noise was identified as a significant and unavoidable impact. No changes are necessary.

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0064-6
cont'd

exposed to helicopter noise only intermittently on the days that helicopters are used. For these reasons, the County Code exemption for construction should be applied to the helicopter use, and this impact should be less than significant, particularly after consideration of the applicable RPMs.

4.15 Wetlands

0064-7

The DEIS/EIR states in Table 4.12-1, under "Freshwater Pond", a category that includes constructed facilities, such as Cushing Pond, Caldwell Pond, and detention ponds in Alpine Meadows, that "freshwater ponds qualify as waters of the State and potential waters of the U.S." (page 4.12-6). This is not necessarily the case for all constructed ponds. A wetland delineation has been prepared for Cushing Pond (see Attachment B), and the US Army Corps of Engineers has confirmed that Cushing Pond is not a Water of the US (see Attachment C). Cushing Pond was constructed as an ornamental pond and occurs in a landscaped setting. It is lined and periodically drained for maintenance. As such, it is very unlikely to qualify as a water of the State.

Therefore, the filling of this pond would not contribute to the loss of wetlands identified in Impact 4.15-1 for Alternative 2.

Please also note that the delineation prepared for Cushing Pond states that the pond is 0.20 acres, not 0.25 acres as stated on page 4.15-10 and elsewhere.

4.16 Geology, Soils and Seismicity

0064-8

Impact 4.16-2 finds that the increased exposure of people and structures would be an **adverse** and **significant impact** prior to application of the RPMs. However, essentially the same impact in Section 4.6, Public Safety (changes to the level of avalanche risk and avalanche mitigation protocols, and potential changes to avalanche risk resulting from climate change) is **minorsly beneficial** and **less than significant**. Given that the "existing Squaw Valley Avalanche Mitigation Program that has maintained a high level of public safety would continue to operate for Alternative 2" (page 4.16-21), that any construction in a PAHA must be constructed to withstand a design avalanche (page 4.16-22), and that active management of ski slopes and implementation of avalanche hazard mitigation contributes beneficial effects related to the magnitude and frequency of future avalanches (page 4.16-22), the increased risk of exposure to avalanches would be **beneficial** or, to be conservative, **minorsly adverse**, and **less than significant**. The statement that there could be tree clearing or other conditions that could change avalanche run out zones is speculative. Further, the steps identified in Mitigation Measure 4.16-2 are already required and/or in place, including coordinating avalanche response with the fire departments, closing avalanche areas to the public during periods of risk, continuing avalanche mitigation programs, and incorporating structural specifications to address avalanche risk in PAHAs.

Appendix B, Resource Protection Measures

0064-9

For the most part, the RPMs are reasonable and effective means of reducing the impacts of the project. Many are similar or identical to the Conditions of Approval typically applied to lift projects. There is one RPM that we respectfully request be revised:

0064-6 cont'd, Noise (N)

0064-7, Vegetation (V)

The text referenced in Table 4.12-1 has been modified to read as follows:

Freshwater ponds may qualify as waters of the state and potential waters of the United States and are addressed in Section 4.15, "Wetlands," under the lacustrine category. Ponds constructed in uplands may not fall within federal jurisdiction but would could still qualify as waters of the state.

In addition, the fourth sentence in the first paragraph of the discussion of Impact 4.12-1 (Alt. 2) (Draft EIS/EIR page 4.12-20) has been modified to read as follows:

Mountain alder thicket, freshwater emergency wetland, some freshwater ponds, and riverine habitats are wetlands or waters, as defined under state or federal statute...

The same change is made to the first paragraph of the discussion of Impact 4.1-2 (Alt. 2) (Draft EIS/EIR page 4.12-22). These edits make all occurrences of "freshwater pond" in Section 4.12, "Vegetation" consistent with the input provided by the comment.

Section 4.15, "Wetlands" acknowledges that delineations of jurisdictional features may modify acreage values provided in the section. As stated on Page 4.15-1 of the Draft EIS/EIR:

"Exhibit 4.15-1, and acreage values provided in Table 4.15-1 and elsewhere in this section, correspond to an initial estimate of the portions of aquatic habitats in the survey area that may be

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subject to Section 404 of the CWA, the Porter-Cologne Water Quality Control Act, and/or California Fish and Game Code Section 1602. A formal delineation of jurisdictional features associated with each action alternative has not been conducted to confirm the precise boundaries of waters and wetlands consistent with the criteria provided in each of these laws. Such a delineation would be conducted after a single alternative is approved to focus the effort on a limited number of aquatic features. The surveys that have been performed provide sufficient information, however, to determine the presence and extent of these features, and to determine whether the action alternatives will significantly affect those features. A formal delineation, and appropriate verification, may result in refinement of the locations of where these features are present."

This text also justifies continuing to base the acreage of Cushing Pond on the field surveys conducted in support of preparation of the EIS/EIR, and not the additional information provided by the commenter. In addition, the 0.05 acre difference in acreage between the 0.25 acres identified in the EIS/EIR, and the 0.20 acres identified in the comment, would not alter impact conclusions in the Draft EIS/EIR.

As also identified in the paragraph from page 4.15-1 of the Draft EIS/EIR, Section 4.15, "Wetlands" also considers habitats that may fall under the jurisdiction of California Fish and Game Code Section 1602. So, although Cushing Pond may not fall under the jurisdiction of Section 404 of the CWA, or the Porter-Cologne Water Quality Control Act, it is still appropriate to include Cushing Pond in this section in case it falls under the jurisdiction of Section 1602 of the Fish and Game Code.

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The description of "Lacustrine Habitats" on page 4.15-3 of the Draft EIS/EIR has been modified as follows to further clarify this point:

The constructed ponds include Cushing Pond at Squaw Valley, Caldwell Pond on private property, and a detention pond near the based of Alpine Meadows. Although it is unlikely that constructed ponds, particularly Cushing Pond, would fall under the jurisdiction of Section 404 of the CWA or the Porter-Cologne Waer Quality Control Act, they are included in this section using an abundance of caution, and because they could also fall under the jurisdiction of Section 1602 of the Fish and Game Code. Naturally occurring ponds...

0064-8, Soils/Geology/Seismicity (SGS)

Since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project. With removal of Gazex, the impact analyses in Section 4.6, "Public Safety" and for Impact 4.16-2 have been modified to reflect this change in avalanche mitigation approach. The changes to these impact discussions are too long to repeat in this response. Refer to the text of the Final EIS/EIR where the key points of this comment are reflected in the impact discussions related to avalanche risk.

0064-9, Resources Protection Measures/Mitigation Measures (RPM/MM)

0064

RPM MUL-5, as written in Appendix B of the Draft EIS/EIR, requires environmental monitors to be onsite during all construction activities. The comment requests that this RPM be revised to limit environmental monitoring to only those activities and/or times where environmental resources could be adversely affected. The lead agencies agree that not all construction activities would have the potential to affect sensitive resources or result in adverse environmental effects (e.g., interior, electrical work).

In response to this comment, RPM MUL-5 is revised as follows:

At least one environmental monitor, as specified by Placer County, Forest Service or other permitting authority requirements, will be on-site during all construction activities where environmental resources could be adversely affected. The project applicant shall work with Placer County and the Forest Service to identify the specific construction activities that may not require environmental monitoring (e.g., electrical work inside base -terminals). Environmental monitors will be qualified to address the environmental resources being protected (e.g., biological, cultural) per the requirements of each applicable RPM and approved by the Forest Service and Placer County. Unless specified otherwise in other RPMs, monitors will be allowed to cover up to 0.75-mile of the project area at once to allow multiple crews to work in close proximity to each other at the same time. Environmental monitors will have the authority to stop work or direct work in order to help ensure the protection of resources and compliance with all permits

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SVAM Gondola DEIS/EIR Comments
June 6, 2018
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0064-9
cont'd

MUL-5 requires at least one environmental monitor to address protection of biological and cultural resources, with multiple monitors required in some instances. This RPM appears to require that the environmental monitor(s) be present during all construction activities. However, the resources that require protection would be affected primarily by activities involving heavy equipment and ground disturbance, such as vegetation clearing and excavation. There will be construction-related activities that would not disturb any ground or be likely to have any affect on a cultural or biological resource (e.g., painting base terminals). We respectfully request that the requirement for environmental monitors be limited to those activities and/or times where environmental resources could be adversely affected.

Additional Clarifications/Corrections

0064-10

The following clarifications and corrections are intended to clarify the analysis, but would not alter the significance conclusions of the DEIS/EIR.

Page 1-15 Section 1.10, Other Necessary Permits, Licenses, and/or Consultation: Would a Timber Harvest Plan approved by CalFire be required for the three action alternatives?

0064-11

Page 4.4-14 In the last full paragraph, it states that because the action alternatives would generate 10 new Full Time Equivalent Employees (FTEE), housing would need to be provided for five employees. This is in error, because eight of the employees would be seasonal, rather than year-round. As stated on page 4.5-10, the alternatives would result in six FTEEs, and would therefore need to provide housing for three employees.

0064-12

Page 4.6-13 Impact 4.6-2, Operations Efficiency, states that installation of the Gazex would result in the loss of a form of redundancy because the 105-mm howitzer would no longer be used. But there would still be two forms of avalanche mitigation available—the Gazex and hand charges.

0064-13

Page 4.7-66 The last line of Table 4.7-22, SR 28 east of SR 89, should not be shaded and the F should not be bold, because LOS F is the standard for this segment, according to the text on page 4.7-33.

0064-14

Page 4.14-100 Impact 4.14-6 on this page addresses Alternative 4, but the text refers to Alternative 3.

0064-15

Page 4.16-9 The discussion of the current avalanche management programs is out of date. A more accurate discussion is provided on pages 4.6-1 and 4.6-2 of the Section 4.6, Public Safety.

0064-16

Page 4.16-10 Exhibit 4.16-5 appears to conflate the Heywood and Wilson PAHAs, and therefore overstate the actual paths. The Heywood PAHAs developed in 2014 for the VSVSP should be used for those PAHAs in Squaw Valley, because they better reflect existing conditions. Also, the paths depicted

0064-9 cont'd, Resources Protection Measures/Mitigation Measures (RPM/MM)

0064-10, Project Description (PD)

A Timber Harvest Plan would be required for timber removal occurring on SVSH lands. This Timber Harvest Plan would require review and approval by several agencies, including but not limited to CalFire.

0064-11, Land Use (LU)

The comment accurately identified an error in the Draft EIS/EIR, which has been corrected in the Final EIS/EIR.

0064-12, Public Safety (PS)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0064-13, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment is correct. The Final EIS/EIR no longer shows the referenced cell in Table 4.7-22 as shaded, and the "F" in the cell is no longer bolded. No other changes in text or tables are needed to

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make the necessary correction.

0064-14, Wildlife and Aquatics (W&A)

The comment is correct, and references to Alternative 3 on pages 4.14-100 through 4.14-102 should read Alternative 4. The text has been revised in the Final EIS/EIR. However, the analysis and conclusion remain the same.

0064-15, Soils/Geology/Seismicity (SGS)

In response to this comment, the discussion of the current avalanche management programs in the third full paragraph on page 4.16-9 of the Draft EIS/EIR is revised as follows:

~~Active avalanche mitigation involves frequently triggering small slides to help reduce the potential buildup of enough snow to result in large avalanches. Passive avalanche mitigation or protection involves avoidance of avalanche areas or construction of snow stabilizing, resisting, or deflecting structures. Because of the potential for avalanches, the Squaw Valley and Alpine Meadows Ski Patrols routinely perform avalanche control operations including clearing the area of avalanche hazard. The primary methods of active avalanche control are detonation of "hand charges" placed by ski patrol staff and triggering of avalanches by firing artillery at Alpine Meadows. There is also one Gazex exploder (the same device included as part of the proposed project) used at Squaw Valley.~~

Current avalanche management is described on pages 4.6-1 and 4.6-2 of Section 4.6, "Public Safety"

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(under the heading "Existing Avalanche Control Protocol"). At Squaw Valley, mountain operations personnel use hand-charges, Avalaunchers, and Gazex facilities for avalanche mitigation; at Alpine Meadows, mountain operations personnel use hand-charges, Avalaunchers, Gazex facilities, and 105-millimeter (mm) howitzer artillery. Each of these avalanche risk reduction methods is described in Section 4.6, "Public Safety."

0064-16, Soils/Geology/Seismicity (SGS)

Exhibit 4.16-5 combines data from Wilson 1982, Heywood 2014, and Mears 1987 to provide a comprehensive representation of avalanche risk for the entire project area, as none of these sources alone covers the entire project area. Exhibit 4.16-5 represents a concerted effort to present the best information available, using different sources that, in some cases, are not 100% in agreement. Although the result of this consolidation data may overestimate the extent of avalanche risk areas in some locations, this does not affect the impact analysis or conclusions in the EIS/EIR. No edits have been made to Exhibit 4.16-5.

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0064-16|
cont'd

in Exhibit 4.16-5 appear to be slightly off (see for example the Ski Jump PAHA).

0064-17|

As stated previously, we believe the Draft EIS/EIR analyzes the impacts of the proposed Gondola project and alternatives thoroughly and in ample detail.

Please let me know if you have any questions regarding the above comments.

Sincerely,



Adrienne L. Graham
Environmental and Planning Consultant

0064-16 cont'd, Soils/Geology/Seismicity (SGS)

0064-17, Summary (S2)

The comment provides a summary of detailed comments provided above. See responses to the detailed comments above.

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Attachment A
LSC Transportation Consultants, Inc. Memorandum

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**TRANSPORTATION PLANNING AND
TRAFFIC ENGINEERING CONSULTANTS**

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MEMORANDUM

To: Adrienne Graham

From: Gordon Shaw, PE, AICP, LSC Transportation Consultants, Inc.

Date: June 4, 2018

RE: Review of *Squaw Valley Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR*

Per your request, this memo presents our review of the Transportation/Circulation Section of the Gondola DEIS/EIR (April 2018).

- The methodology that yields the conclusion that 34 percent of additional exiting skier traffic generated by the gondola exits during the Sunday PM peak-hour (see page 4.7-21) is questionable for two reasons. As shown in the table on page 64 of Appendix E (Volume, Squaw Valley Road West-Of SR 89), the analyst factors the eastbound Squaw Valley Road counts by a set of hourly "% Skiers" factors without supporting justification. First, no skiers are assumed to have left prior to 11AM, which is not consistent with a common pattern among local season pass holders of skiing only for an hour or two in the morning. This results in parking turnover around 11AM. Secondly, the analyst assumes that 63 percent of eastbound SVR vehicles are skiers in the 1PM hour, 100 percent in the 2 PM hour, and 63 percent in the 3 PM hour (even though overall traffic is higher in the 3 PM hour). In other words, the analysis assumes that every last vehicle eastbound in the 2 PM hour is assumed to be a skier and no one drives eastbound out of the valley during this hour for any other purpose. This factor substantially overstates the impact in the peak-hour. If a more reasonable figure for the PM hour of 75 percent is used, the proportion of all new trip generation in the peak hour would be reduced to 28 percent. This in turn would indicate that the PM peak-hour traffic impacts are too high by a factor of roughly 21 percent.

0064-18, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment suggests that the project's Sunday PM peak hour vehicle trip generation has been overestimated by 21 percent based on a detailed review of page 64 of the Appendix E. The comment concludes that this approach likely overstates project impacts.

Page 4.7-21 of the Draft EIS/EIR describes the analysis approach undertaken to estimate that 34 percent of all Sunday skier visits would leave the Squaw Valley Ski Area during the Sunday afternoon peak hour (i.e., 2 to 3 PM). The commentor suggests that departures would be more dispersed throughout the day, citing parking turnover at the resort that occurs around 11 AM. The commentor suggests that it would be more reasonable to assume that 75 percent of all exiting traffic on eastbound Squaw Valley Road is associated with departing skiers from Squaw Valley Ski Area instead of the assumed 100 percent.

According to Exhibit 4.7-2, 866 vehicles traveled eastbound on Squaw Valley Road through the Christy Hill Road/Far East Road intersection during the Sunday PM peak hour. A total of 879 vehicles were then measured on the eastbound Squaw Valley Road approach to SR 89. Given the lack of sizeable turning movements entering/exiting Squaw Valley Road (aside from Squaw Creek Road) between these intersections, it can be concluded that the vast majority of eastbound trips during the Sunday PM peak hour on Squaw Valley Road originate from the Squaw Valley Ski Area. The precise number (which cannot be calculated because it would require origin-destination survey data) is likely closer to 100 percent than 75 percent.

0064-18

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Hence, the assumption of 100 percent was made to ensure a conservative analysis. Testing was performed to assess the sensitivity of the estimated number of skiers that exit prior to 11 AM. Because total outbound flows were relatively modest, a change in this assumption would not materially affect the project's trip generation. In summary, the project's Sunday PM peak hour trip generation is considered reasonably conservative and appropriate for the EIS/EIR analysis.

Review of Gondola DEIS/EIR Transportation & Circulation Section

Page 2

0064-19

- The LOS standards cited on Page 4.7-33 do not reflect the adopted *Village at Squaw Valley Specific Plan* (VSVSP) Policy CP-1, which states that during peak periods, LOS F is acceptable within the VSVSP area. This includes the intersections along Squaw Valley Road at Chamonix Place, Village East Road, and Far East Road / Christy Hill Road. An LOS F should have been identified as acceptable for these intersections. Because LOS F is acceptable, adding additional traffic (e.g., increasing Volume-to-Capacity ratio by more than 0.05 or increasing ADT by more than 100) should not be identified as a significant impact at any of these intersections. Therefore, Impact 4.7-2 (Alt. 2), impacts on Placer County intersections, should not be considered significant. In addition, Impact 4.7-10, cumulative impacts on Placer County intersections, should not be significant regarding the Chamonix Place intersection (although it would still be significant for the Squaw Creek Road intersection).

0064-20

- Similarly, the *Tahoe Basin Area Plan* adopted by Placer County in 2017 includes the following policy:

T-P-6 -- Maintain consistency with Level of Service (LOS) and quality of service standards identified in the Regional Transportation Plan (RTP), with the exception of intersections and roadway segments within the Town Center boundaries where LOS F is acceptable during peak periods.

While this is cited in the DEIS/EIR (page 4.7-17), the discussion of potential significance of impacts associated with traffic growth on page 4.7-33 does not reflect the nuance that an increase within the Town Center boundaries of any amount should not be considered significant. In this instance, this would not alter the conclusions of the analysis.

0064-19, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment states that the significance criteria in the vicinity of Squaw Valley should reflect the adopted *Village at Squaw Valley Specific Plan* (VSVSP) Policy CP-1, which allows LOS F within the VSVSP area during peak periods. At the time the Draft EIS/EIR for the Gondola was being prepared, the EIR for the VSVSP was part of ongoing litigation. Therefore, taking a conservative approach, Placer County directed the project team to assume that Policy CP-1 was not in effect when defining the significance criteria. Placer County has made the decision to continue this conservative approach in the Final EIS/EIR.

0064-20, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment suggests that the discussion of potential significance of impacts should disclose that the growth in traffic within Town Center boundaries (as defined by the *Tahoe Basin Area Plan*) of any amount should not be considered significant, though it is noted that this would not alter the conclusions of the analysis.

Page 4.7-17 of the Draft EIS/EIR indicates that LOS F is considered acceptable within the Tahoe City Town Center. Page 4.7-33 reiterates this significance criterion. It also includes a criterion pertaining to worsening 'unacceptable' operations to a significant degree. But since operations on the segment of SR 28 east of SR 89 are considered acceptable in the LOS F range, there is no condition in which an unacceptable condition would result, which would trigger this criterion

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relating to exacerbation of unacceptable operations.

Attachment B
Wetland Delineation for the 2.8-Acre Squaw Valley Terminal
Study Area

0064

**WETLAND DELINEATION
FOR THE
±2.8-ACRE SQUAW VALLEY TERMINAL
STUDY AREA
SQUAW VALLEY, PLACER COUNTY, CALIFORNIA**



Prepared for:
SQUAW VALLEY SKI CORPORATION
P.O. Box 2007
Olympic Valley, California 96146

Prepared by:


12240 Herdal Drive, Ste. 14,
Auburn, California 95603
(530) 888-0130

FEBRUARY 2016

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Appendix B: Plant Species Observed
Appendix C.: Completed Aquatic Resources Excel Spreadsheet

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WETLAND DELINEATION FOR THE ±2.8-ACRE SQUAW VALLEY TERMINAL

INTRODUCTION

On behalf of Squaw Valley Ski Corporation, Salix Consulting delineated waters of the United States on the approximate 2.8-acre Squaw Valley Terminal study area (study area) in eastern Placer County, CA. The study area is located in Olympic Valley, almost two miles west of Highway 89. The location corresponds to portions of Section 31 of Township 16 North and Range 16 East on the 7.5 minute Tahoe City USGS (United States Geological Survey) quadrangle (Figure 1). The latitude and longitude of the approximate center of the site are 39° 11' 44" North and 120° 14' 13" West.

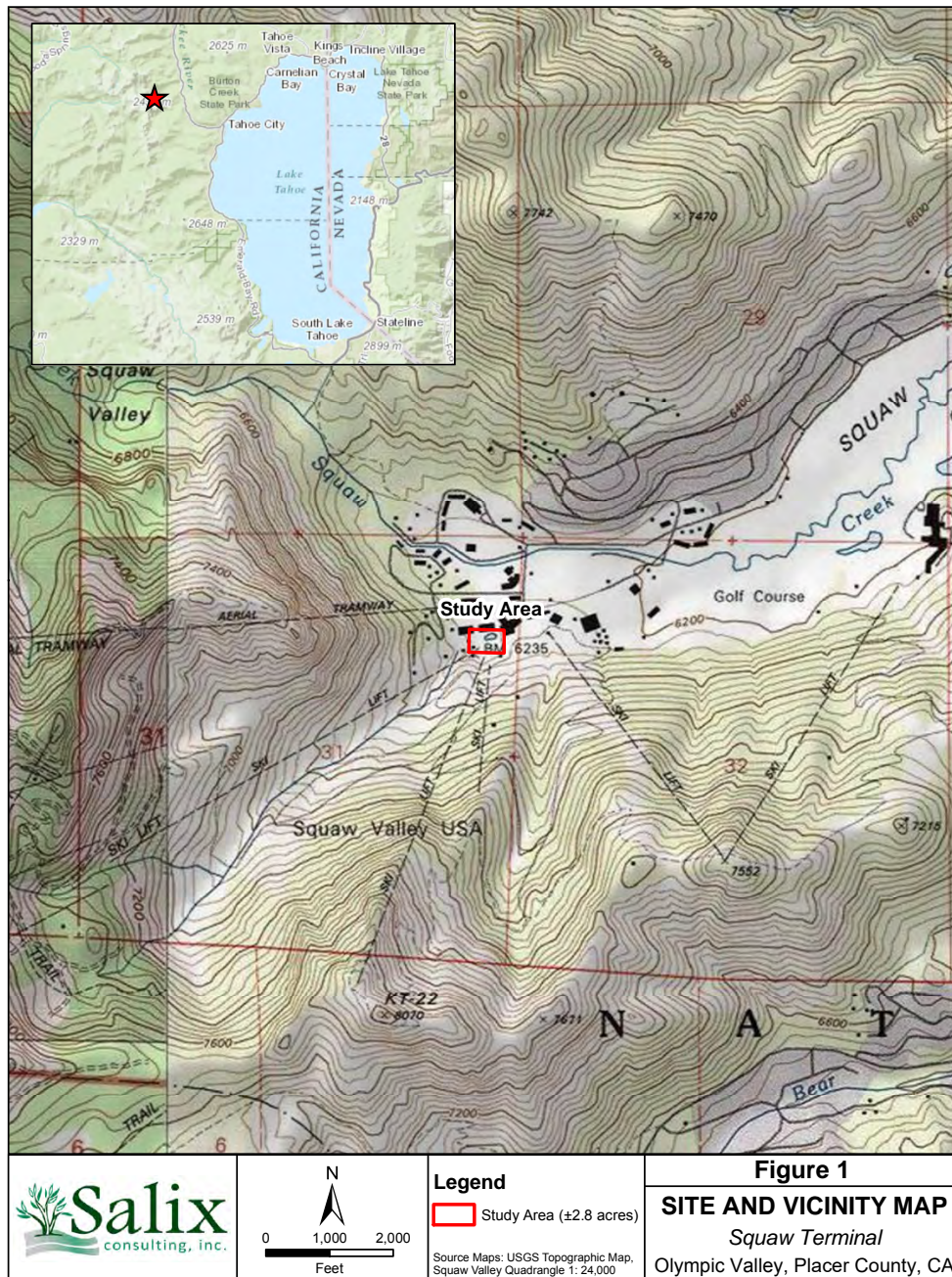
The study area is situated in the northeastern Sierra Nevada, within the Squaw Valley Resort area. It is just east of the Pacific Crest and is bounded to the north, west, and south by moderately-steep, rocky slopes. The approximate elevation of the study area is 6,233 feet. The study area has a man-made, decorative pond (Cushing Pond), two ski lift terminals, a small outdoor amphitheater, condominiums, and much of it is landscaped with turf or ornamental shrubs (Figure 2).

The study area and areas surrounding the study area have been evaluated by Jeff Glazner on numerous occasions since October 2012. Changes to the Squaw Valley Village proposed project footprint were made in 2013, eliminating the Cushing Pond area from the larger project. The study area discussed in this report is now being considered for a new ski terminal.

Cushing Pond History and Management

Cushing pond is a man-made feature located in a developed portion in the southwest area of Squaw Valley Village. The pond is approximately 0.2 acre in size, generally oval shaped, and has a maximum depth of approximately seven feet. It was constructed in an upland area after the 1960 Olympics as a landscape amenity for new development.

Prior to the 1960 Olympics, the south fork of Squaw Creek flowed through the area where Cushing Pond now sits. In the late 1950s the U.S. Army Corps of Engineers (Corps) rerouted the Creek to create dry space for the 1960 Winter Olympics. The area created was used for the Olympics, and after that, the area had several uses. Old-timers in the Valley indicate that there were tennis courts at the same location in the 1960's. In the later 1960s or 1970s, condominiums were built, and the ornamental pond, Cushing Pond, was created. The pond is primarily a visual amenity for the local area, and is occasionally used for recreation such as the annual "Lake Cushing Crossing," an event in which participants attempt to cross the cold waters of Cushing Pond on skis, a snowboard, or any ski or snowboard-based vessel including creative pond-skimming



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contraptions. It is currently surrounded by turf and landscaping, condominiums, a ski lift, and other ski-related facilities.

Cushing Pond is not a remnant of the old channel; it was created years after the channel was moved. Historic USGS maps show Cushing Pond but provide no evidence that the pond is related to the former alignment of the south fork of Squaw Creek.

At some point, in the late 1960's, the pond was dug to its current dimensions and lined with black plastic. Water level is managed by visual observation with a nearby valve on an as-needed basis. Because the pond is lined, it does not require constant input; the valve is turned on and off as needed to maintain a full pond. However, water was shut off to the pond during this past summer and the pond is now dry. Local watershed input is minimal as water is diverted to other drainages. The plastic liner covers the entire bottom of the pond, thus only minimal percolation occurs. The condition of the liner is not currently known as it is mostly covered with sediment.

When Cushing pond is full, it does not exceed its banks because the full-water elevation is the point at which runoff will flow through the constructed spillway into a nearby vertical culvert, which carries the water to the storm drain system and eventually into Squaw Creek about 1000 feet away.

Directions to the Site

Interstate 80 east to Truckee, south on State Route 89, east on Squaw Valley Road for two miles to Squaw Valley Village. Site located near the K-22 Express Ski Lift. The site is accessible to the public.

CONTACT INFORMATION

Property Owner:	Delineator:
Squaw Valley Ski Corporation	Jeff Glazner
P.O. Box 2007	Salix Consulting, Inc.
Olympic Valley, California 96146	12240 Herdal Drive, Suite 14
Contact: Chevis Hosea	Auburn, California 95603
	Phone: (530) 888-0130
	jglazner@salixinc.com

METHODS

The delineation was conducted September 24, 2015 by Jeff Glazner according to the 1987 Corps Manual (Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region. Information about vegetation, soils, and hydrology was recorded at two data point locations. Data sheets are located in Appendix A.

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Plants observed on the subject parcel during the field evaluations are provided in Appendix B, along with the scientific name and the wetland indicator status of each species listed. Where a plant species observed has a wetland indicator status (not UPL), plant nomenclature follows Lichvar et.al. (2014). Otherwise, species names are aligned with The Jepson Manual (Baldwin et.al. 2012) or Calflora, if there have been recent nomenclatural changes.

General soils information was obtained from the Soil Survey, Tahoe National Forest Area (USDA/NRCS). In the field, a Munsell Color chart was used to determine moist soil colors.

A Trimble GeoXH GPS was used to obtain location information for three parameter data points, stream edges areas, and other pertinent features. Photos showing the intermittent stream (Figure 4a) and Cushing Pond (Figure 4b) are included. A recent aerial photograph was used as the photo base in ArcGIS 10 to create the wetland delineation map.

RESULTS

Climate

Climate summary information for Olympic Valley was obtained from Weatherbase, which utilizes data from NOAA National Centers for Environmental Information (formerly the National Climatic Data Center).

The average temperature for the year in Olympic Valley is 43.3°F, with an average high temperature of 56°F and an average annual low of 30.5°F. The warmest months, on average, are July and August (approximately 77°), and the coldest months on average are December, January, and February (19° to 20°).

The average amount of precipitation for the year in Olympic Valley is 31.5", much of which falls December through March as snow. The months with the least precipitation on average are July and August, with averages of 0.2" and 0.3" respectively. Precipitation occurs, on average, 77.0 days of the year. The average annual snowfall is 191.0". The month with the most snow is usually January with an average of 45.9" of snow.

Soils

Regional geologic maps indicate that the project site is underlain by various age volcanic rocks, granitic rocks, alluvial and glacial deposits (Saucedo, G.J., 2005). Glaciation is responsible for shaping much of the Olympic Valley area and depositing sediments on the valley floor. Two soil units have been mapped on the site (Figure 3):

- Tallac very gravelly sandy loam, 2 to 30 percent slopes
- Tallac very gravelly sandy loam, 30 to 50 percent slopes



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The Tallac series consists of deep and very deep moderately-well and well-drained soils that formed in material weathered from glacial deposits. Tallac soils are on glacial moraines and outwash plains and have slopes of 0 to 75 percent. The parent material consists of glaciofluvial deposits. Depth to a root restrictive layer, duripan, is 41 to 60 inches. Water movement in the most restrictive layer is moderately low. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is low. This soil is not flooded or ponded. A seasonal zone of water saturation is at 51 inches during March, April, and May. Organic matter content in the surface horizon is about 6 percent. These soil units do not meet hydric criteria.

Hydrology

The study area is located within the Truckee Watershed (Hydrologic Unit Code 16050102 (HUC-8)). This watershed drains to the Truckee River, which is not a Traditional Navigable Waterway (TNW).

The study area is situated just north of a ski run and east of a developed gentle slope. One drainage flows through the study area, a cobble-lined seasonal drainage (an intermittent stream) in the eastern area (Figure 4a). The intermittent stream flows from the south and collects local water from the adjacent ski slope. Water flowing through the intermittent stream enters a vertical culvert and is carried through the storm drain system and eventually outfalls into Squaw Creek, approximately 1000 feet to the northeast.

Cushing Pond is a man-made, entirely controlled water feature. It is lined with black plastic and receives water through a three-inch PVC pipe originating from a valve box west of the pond (shown on the Wetland Delineation map). Water in Cushing pond is kept at spillway elevation, except for times of maintenance, when the pond is drained. Figure 4b shows Cushing Pond empty, during a maintenance period.

When Cushing Pond reaches capacity, it spills through a narrow cobble-lined conveyance on the east side of the pond into the adjacent constructed rock-lined drainage (mapped as an intermittent stream).

No surface drainages feed Cushing Pond. The surface watershed for Cushing Pond is small and most of the water flowing toward the pond is intercepted by storm drains, ditches, or other landscaped features such as french drains and rocked or graveled areas. Only the immediate area around the pond (about 100 feet) contributes rain and snow runoff, conveyed through sheet flow, to the pond.

Vegetation

The study area would fall into a vegetation category of “disturbed” or “developed.” It contains turf, pavement, gravel, landscaping, structures, and other minor components of a developed landscape. Natural vegetation includes cheatgrass (*Bromus tectorum*), one-seeded pussypaws (*Calyptridium monospermum*), mountain tarweed (*Madia glomerata*),



Looking upslope along rocky intermittent stream, from near Cushing Pond. *Photo date 9-24-15.*



Looking over intermittent stream at vertical culvert that carries water into storm drain system. *Photo date 9-24-15.*



Looking downstream along rocky intermittent stream. Cushing Pond on left. *Photo date 9-24-15.*



Figure 4a

SITE PHOTOS

Squaw Terminal
Olympic Valley, Placer County, CA

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Looking west over Cushing Pond.
Photo date 9-24-15.



Looking east over Cushing Pond.
Photo date 9-24-15.



Looking down into Cushing Pond
and twenty years of sediment
accumulation. *Photo date 9-24-15.*



Figure 4b

SITE PHOTOS

Squaw Terminal

Olympic Valley, Placer County, CA

bull thistle (*Cirsium vulgare*), squirreltail (*Elymus elymoides*), thimbleberry (*Rubus parviflorus*), pale mountain monardella (*Monardella odoratissima*), and common yarrow (*Achillea millefolium*). Woody vegetation includes quaking aspen (*Populus tremuloides*), interior rose (*Rosa woodsii*), lodgepole pine (*Pinus contorta*), and pacific willow (*Salix lasiandra*).

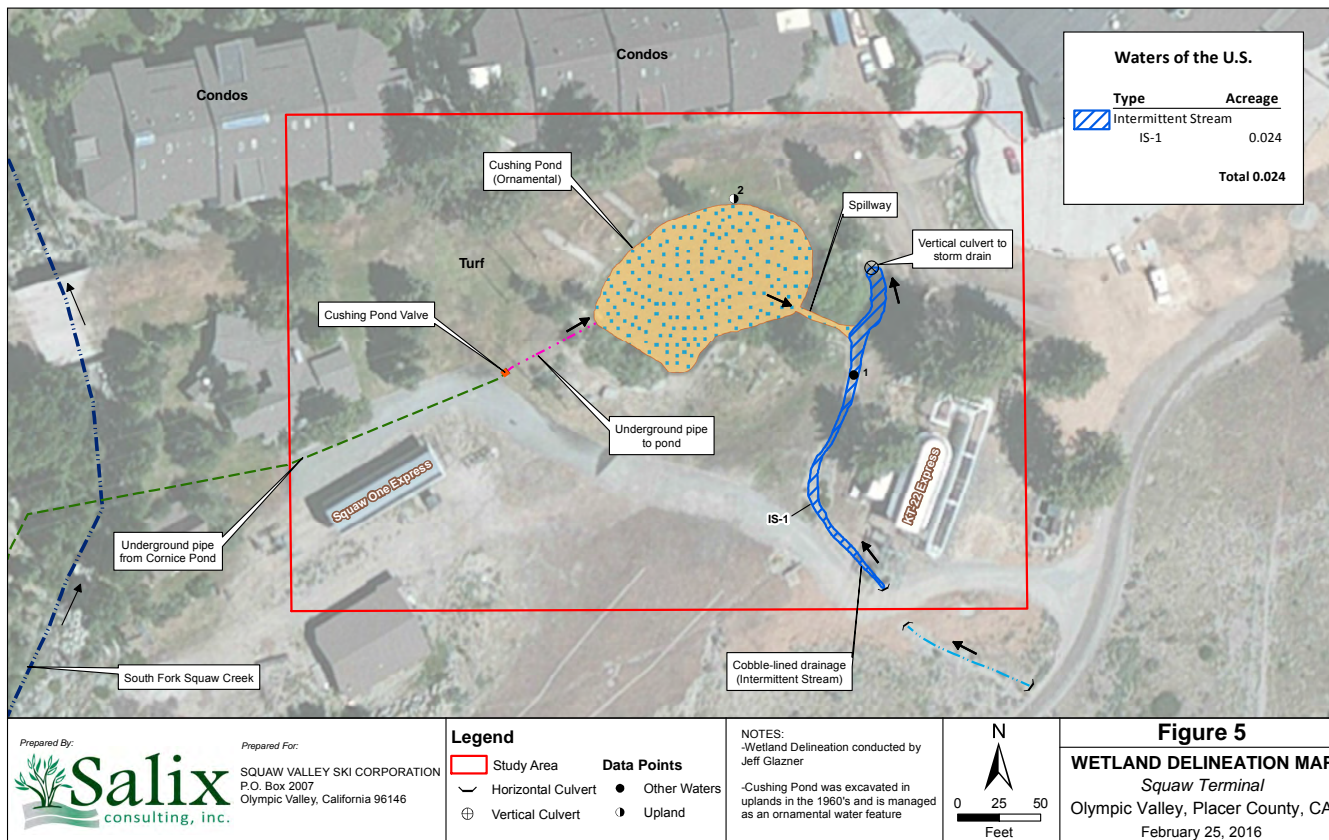
Waters of the United States

One type of waters of the U.S., intermittent stream, has been mapped on the study area for a total of 0.024-acre. The wetland delineation map is presented in Figure 5.

Intermittent Stream

The intermittent stream flows from the south, collecting water from the adjacent ski slope and focusing it into a rock-lined swale that flows into a vertical culvert and into the storm drain system. The mapped area of this curvilinear feature is 0.024 acre (Figure 4a).

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REFERENCES AND OTHER SOURCES

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**Appendix A
Wetland Data Sheets**

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WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: Squaw Valley Terminal City/County: Olympic Valley/Placer Sampling Date: 9-24-15
Applicant/Owner: Squaw Valley Ski Corporation State: CA Sampling Point: 01
Investigator(s): J. Glazner Section, Township, Range: T16N R16E Sec 31
Landform (hillslope, terrace, etc.): hillslope Local relief (concave, convex, none): Concave Slope (%): 3%
Subregion (LRR): MLRA 22A Lat: 39°11'44"N Long: 120°14'13"W Datum: _____
Soil Map Unit Name: Tallac very gravelly sandy loam 2-30% slopes NWI classification: _____
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)
Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes X No _____
Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____ No _____	Sampled area is in an other Waters, Is the Sampled Area within a Wetland? Yes _____ No _____
Hydric Soil Present?	Yes _____ No _____	
Wetland Hydrology Present?	Yes _____ No _____	
Remarks: <u>Mapped as an intermittent stream. Feature captures water from nearby ski slope and flows through a constructed rock lined swale.</u>		

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A) Total Number of Dominant Species Across All Strata: _____ (B) Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B) Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species _____ x 5 = _____ Column Totals: _____ (A) _____ (B) Prevalence Index = B/A = _____ Hydrophytic Vegetation Indicators: ___ 1 - Rapid Test for Hydrophytic Vegetation ___ 2 - Dominance Test is >50% ___ 3 - Prevalence Index is ≤3.0 ¹ ___ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ___ 5 - Wetland Non-Vascular Plants ¹ ___ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
_____ = Total Cover				
Sapling/Shrub Stratum (Plot size: _____)				
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
5. _____	_____	_____	_____	
_____ = Total Cover				
Herb Stratum (Plot size: _____)				
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
5. _____	_____	_____	_____	
6. _____	_____	_____	_____	
7. _____	_____	_____	_____	
8. _____	_____	_____	_____	
9. _____	_____	_____	_____	
10. _____	_____	_____	_____	
11. _____	_____	_____	_____	
_____ = Total Cover				
Woody Vine Stratum (Plot size: _____)				
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
_____ = Total Cover				
% Bare Ground in Herb Stratum _____				
Remarks: <u>Rocky channel, sparsely vegetated with bull thistle, hairy willow herb and thimbleberry</u>				

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SOIL Sampling Point: 01

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 2 cm Muck (A10)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1) (except MLRA 1)	<input type="checkbox"/> Very Shallow Dark Surface (TF12)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Matrix (F3)	³ Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Redox Depressions (F8)	

Restrictive Layer (if present):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes _____ No _____

Remarks: *NO soil data taken. Feature is rock-lined.*

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)	Secondary Indicators (2 or more required)
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Salt Crust (B11)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Presence of Reduced Iron (C4)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Stunted or Stressed Plants (D1) (LRR A)
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	

Field Observations:

Surface Water Present? Yes _____ No _____	Depth (inches): _____	Wetland Hydrology Present? Yes _____ No _____
Water Table Present? Yes _____ No _____	Depth (inches): _____	
Saturation Present? Yes _____ No _____	Depth (inches): _____	

(includes capillary fringe)

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: *Constructed drainage that carries local runoff from nearby ski slope and overflow from crushing pond. Dry during summer and fall.*

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WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: Squaw Valley Terminal City/County: Olympic Valley Placer Sampling Date: 9-24-15
Applicant/Owner: Squaw Valley Ski Corporation State: CA Sampling Point: 02
Investigator(s): J. Glazner Section, Township, Range: T16N R16E Sec 31
Landform (hillslope, terrace, etc.): Hillslope Local relief (concave, convex, none): none Slope (%): 2%
Subregion (LRR): MLRA 22A Lat: 39°11'44" N Long: 120°14'13" W Datum: _____
Soil Map Unit Name: Tallic very gravelly sandy loam, 2-30% slopes NWI classification: _____
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)
Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes _____ No X
Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____ No <u>X</u>	Is the Sampled Area within a Wetland? Yes _____ No <u>X</u>
Hydric Soil Present?	Yes _____ No <u>X</u>	
Wetland Hydrology Present?	Yes _____ No <u>X</u>	
Remarks: <u>Sample location just above pond in turf.</u>		

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
= Total Cover			
Sapling/Shrub Stratum (Plot size: _____)			
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
= Total Cover			
Herb Stratum (Plot size: _____)			
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
= Total Cover			
Woody Vine Stratum (Plot size: _____)			
1. _____	_____	_____	_____
2. _____	_____	_____	_____
= Total Cover			
% Bare Ground in Herb Stratum _____			
Remarks: <u>Turfgrass (mowed and not flowering)</u>			

Dominance Test worksheet:
Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)
Total Number of Dominant Species Across All Strata: _____ (B)
Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)
Prevalence Index worksheet:
Total % Cover of: _____ Multiply by: _____
OBL species _____ x 1 = _____
FACW species _____ x 2 = _____
FAC species _____ x 3 = _____
FACU species _____ x 4 = _____
UPL species _____ x 5 = _____
Column Totals: _____ (A) _____ (B)
Prevalence Index = B/A = _____
Hydrophytic Vegetation Indicators:
___ 1 - Rapid Test for Hydrophytic Vegetation
___ 2 - Dominance Test is >50%
___ 3 - Prevalence Index is ≤3.0¹
___ 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)
___ 5 - Wetland Non-Vascular Plants¹
___ Problematic Hydrophytic Vegetation¹ (Explain)
¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
Hydrophytic Vegetation Present? Yes _____ No X

02

Sampling Point: 02

[illegible]

Indicators for Problematic Hydric Soils³

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Hydric Soil Present? Yes _____ No X

marks:
Loamy soil, non native profile, in lawn.

___ Surface Water (A1)	___ Water-Stained Leaves (B9) (except	___ Water-Stained Leaves (B9) (MLRA 1, 2,
___ High Water Table (A2)	___ MLRA 1, 2, 4A, and 4B)	___ 4A, and 4B)
___ Saturation (A3)	___ Salt Crust (B11)	___ Drainage Patterns (B10)
___ Water Marks (B1)	___ Aquatic Invertebrates (B13)	___ Dry-Season Water Table (C2)
___ Sediment Deposits (B2)	___ Hydrogen Sulfide Odor (C1)	___ Saturation Visible on Aerial Imagery (C9)
___ Drift Deposits (B3)	___ Oxidized Rhizospheres along Living Roots (C3)	___ Geomorphic Position (D2)
___ Algal Mat or Crust (B4)	___ Presence of Reduced Iron (C4)	___ Shallow Aquitard (D3)
___ Iron Deposits (B5)	___ Recent Iron Reduction in Tilled Soils (C6)	___ FAC-Neutral Test (D5)
___ Surface Soil Cracks (B6)	___ Stunted or Stressed Plants (D1) (LRR A)	___ Raised Ant Mounds (D6) (LRR A)
___ Inundation Visible on Aerial Imagery (B7)	___ Other (Explain in Remarks)	___ Frost-Heave Hummocks (D7)
___ Sparsely Vegetated Concave Surface (B8)		

Wetland Hydrology Present? Yes _____ No X

Remarks: upland landscape position just above rim of pond.

Appendix B
Wetland Status of Plant Species Observed

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Appendix B - Squaw Terminal Plants Observed with Wetland Status

Taxon	Common Name	Wetland Status
<i>Abies concolor</i>	White fir	UPL
<i>Achillea millefolium</i>	Common yarrow	FACU
<i>Alnus incana</i> subsp. <i>tenuifolia</i>	Mountain alder	FACW
<i>Amelanchier utahensis</i>	Utah serviceberry	FACU
<i>Artemisia arbuscula</i> subsp. <i>longiloba</i>	Low sagebrush	UPL
<i>Bromus inermis</i>	Smooth brome	FACU
<i>Bromus tectorum</i>	Cheat grass	UPL
<i>Calyptidium monospermum</i>	One-seeded pussypaws	UPL
<i>Carex nebrascensis</i>	Nebraska sedge	OBL
<i>Carex</i> sp.	Sedge	VARIES
<i>Ceanothus cordulatus</i>	Mountain whitethorn	UPL
<i>Cirsium vulgare</i>	Bull thistle	FACU
<i>Cornus sericea</i>	Creek dogwood	UPL
<i>Descurainia sophia</i>	Tansy mustard	UPL
<i>Eleocharis acicularis</i>	Least spikerush	OBL
<i>Elymus elymoides</i>	Squirreltail	FACU
<i>Elymus glaucus</i>	Blue wildrye	FACU
<i>Epilobium ciliatum</i>	Hairy willow-herb	FACW
<i>Equisetum arvense</i>	Common horsetail	FAC
<i>Ericameria nauseosa</i>	Rubber rabbitbrush	UPL
<i>Erythranthe guttata</i>	Common monkeyflower	OBL
<i>Juncus balticus</i> subsp. <i>ater</i>	Baltic rush	FACW
<i>Linum lewisii</i>	Prairie flax	UPL
<i>Madia glomerata</i>	Mountain tarweed	FACU
<i>Monardella odoratissima</i> subsp. <i>pallida</i>	Pale mountain monardella	FACU
<i>Pinus contorta</i> subsp. <i>murrayana</i>	Lodgepole pine	FAC
<i>Pinus jeffreyi</i>	Jeffrey pine	UPL
<i>Poa pratensis</i> subsp. <i>pratensis</i>	Kentucky bluegrass	FAC
<i>Populus tremuloides</i>	Quaking aspen	FACU
<i>Potentilla gracilis</i>	Slender cinquefoil	FAC
<i>Ribes nevadense</i>	Mountain pink currant	FAC
<i>Rosa woodsii</i> subsp. <i>ultramontana</i>	Interior rose	FACU
<i>Rubus parviflorus</i>	Thimbleberry	FAC
<i>Salix lasiandra</i>	Pacific willow	FACW
<i>Sambucus nigra</i>	Black elderberry	FAC
<i>Senecio integerrimus</i>	Mountain butterweed	FACU
<i>Sorbus californica</i>	California mountain ash	UPL
<i>Taraxacum officinale</i>	Common dandelion	FACU

Taxon	Common Name	Wetland Status
<i>Tragopogon pratensis</i>	Meadow salsify	UPL
<i>Verbascum thapsus</i>	Woolly mullein	FACU
<i>Wyethia mollis</i>	Mountain mule's-ears	UPL

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Appendix C
Aquatic Resources Spreadsheet

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Waters_Name	Cowardin_Code	HGM_Code	Meas_Type	Amount	Units	Waters_Type	Latitude	Longitude	Local_Waterway
Intermittent Stream 1	R4SB2	RIVERINE	Area	0.024	ACRE	ISOLATE	39.1953	-120.237	Squaw Creek

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Attachment C
US Army Corps of Engineers Letter

0064

REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SACRAMENTO DISTRICT
1325 J STREET
SACRAMENTO CA 95814-2922

April 18, 2016

Regulatory Division SPK-2012-00582

Squaw Valley Ski Corporation
Attn: Mr. Chevis Hosea
P.O. Box 2007
Olympic Valley, California 96146-2007

Dear Mr. Hosea:

We are responding to your agent's March 4, 2016, request for a preliminary jurisdictional determination (JD), in accordance with our Regulatory Guidance Letter (RGL) 08-02, for the Squaw Terminal site. The approximately 3-acre project site is located near Squaw Creek, Latitude 39.195471°, Longitude -120.237100°, Olympic Valley, Placer County, California.

Based on available information, **we concur with the amount and location of water bodies on the site as depicted on the enclosed February 25, 2016, Figure 5: Wetland Delineation Map, Squaw Terminal, Olympic Valley, Placer County, CA drawing prepared by Salix Consulting, Inc.** The approximately 0.024 acre of intermittent stream (IS-1) present within the survey area is a potential Water of the United States regulated under Section 404 of the Clean Water Act.

Alternatively, according to Title 33 CFR, Part 328.3[d], dated November 13, 1986, "artificial reflecting/swimming pools or other small ornamental bodies of water created by excavating and/or diking dry land to retain water for primarily aesthetic reasons are generally not considered to be Waters of the United States." Therefore, a Department of the Army Permit would not be required for activities in Cushing Pond. Cushing Pond is a man-made ornamental pond, constructed in the 1960's as a landscape amenity. It is approximately 0.15 acre in size, with a maximum depth of approximately 5 feet. The pond has a plastic liner and is surrounded by turf and landscaping.

Our disclaimer of jurisdiction is only for Section 404 of the Federal Clean Water Act and does not refer to, nor affect jurisdiction over any waters present on site. Other Federal, State, and local laws may apply to your activities. Therefore, in addition to contacting other Federal and local agencies, you should also contact state regulatory authorities to determine whether your activities may require other authorizations or permits. In particular, your proposed activity may still be regulated by the State of California's Regional Water Quality Control Boards.

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-2-

We have enclosed a copy of the *Preliminary Jurisdictional Determination Form* for this site. Please sign and return a copy of the completed form to this office. Once we receive a copy of the form with your signature we can accept and process a Pre-Construction Notification or permit application for your proposed project.

You should not start any work in potentially jurisdictional waters of the United States unless you have Department of the Army permit authorization for the activity. You may request an approved JD for this site at any time prior to starting work within waters. In certain circumstances, as described in RGL 08-02, an approved JD may later be necessary.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This preliminary determination has been conducted to identify the potential limits of wetlands and other water bodies which may be subject to Corps of Engineers' jurisdiction for the particular site identified in this request. A Notification of Appeal Process and Request for Appeal form is enclosed to notify you of your options with this determination. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are U.S. Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

We appreciate your feedback. At your earliest convenience, please tell us how we are doing by completing the customer survey on our website under *Customer Service Survey*.

Please refer to identification number SPK-2012-00582 in any correspondence concerning this project. If you have any questions, please contact me at our California North Branch Office, Regulatory Division, U.S. Army Corps of Engineers, 1325 J Street, Room 1350, Sacramento, California 95814-2922, by email at Leah.M.Fisher@usace.army.mil, or telephone at 916-557-6639. For more information regarding our program, please visit our website at www.spk.usace.army.mil/Missions/Regulatory.aspx.

Sincerely,



Leah M. Fisher
Senior Regulatory Project Manager
California North Branch
Regulatory Division

Enclosures

cc: (w/o encls)

Mr. Jeff Glazner, Salix Consulting, Inc., JGlazner@salixinc.com

0071

WILMERHALE

Via electronic mail

June 11, 2018

U.S. Forest Service
 Tahoe National Forest, Truckee Ranger District
 c/o NEPA Contractor
 P.O. Box 2729
 Frisco, CO 80443

Michael Hazel

+1 720 274 3141 (t)
 +1 720 274 3133 (f)
 michael.hazel@wilmerhale.com

Re: **Comments on the Squaw Valley | Alpine Meadows Base-to-Base
 Gondola Project Draft EIS/EIR**

The following comments are submitted on behalf of Squaw Valley | Alpine Meadows in response to the Draft Environmental Impact Statement / Environmental Impact Report ("DEIS/EIR") jointly prepared by Tahoe National Forest and Placer County regarding the proposed Base-to-Base Gondola.

0071-1

The Base-to-Base Gondola project proposes to connect Squaw Valley Ski Area to Alpine Meadows Ski Area via a gondola. A portion of the gondola will cross private property owned by Troy Caldwell. Mr. Caldwell's property is adjacent to, but *not* part of, the Granite Chief Wilderness. In fact, no part of the Base-to-Base Gondola would enter or cross Granite Chief under any of the alternatives analyzed in the DEIS/EIR. For that reason, the DEIS/EIR correctly concludes that the project would have "no direct effects" in the wilderness. *See* DEIS/EIR 4.3-1.

Nevertheless, because an aspirational wilderness boundary line encroaching on Mr. Caldwell's property was drawn on a map, there appears to be lingering confusion over (and in some cases attempts to mischaracterize) the proper legal treatment of Mr. Caldwell's property. But this historical anomaly does not change the analysis, and the law is clear: Mr. Caldwell's property is all private land and must be treated as such for purposes of analyzing each of the alternatives.

1. Mr. Caldwell's private property is not part of Granite Chief Wilderness.

0071-2

In the Wilderness Act of 1964, Congress designated certain pristine lands to be set aside as "wilderness areas." According to the statute's unambiguous text, however, only federally owned land was eligible to become wilderness. The law expressly defines the term "wilderness" as "an area of undeveloped *Federal* land." 16 U.S.C. § 1131(c) (emphasis added). And the National Wilderness Preservation System

0071-1, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness," as it pertains to the significance of wilderness designation on private lands contained within or adjacent to designated wilderness areas. No further response is provided.

0071-2, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness," as it pertains to the significance of wilderness designation on private lands contained within or adjacent to designated wilderness areas. No further response is provided.

Wilmer Cutler Pickering Hale and Dorr LLP, 1225 17th Street, Suite 2600, Denver, Colorado 80202

Beijing Berlin Boston Brussels Denver Frankfurt London Los Angeles New York Palo Alto Washington

0071

0071-2 cont'd, Wilderness (W2)

0071-3, Wilderness (W2)

Regarding the use of the phrase "private lands within the congressionally mapped GCW" in the Draft EIS/EIR, it is important that these private lands be clearly distinguished from National Forest System-GCW lands in this analysis so that proper historical context can be provided regarding the evolution of land use management in the area. Section 4.3, "Wilderness" explains that the Caldwell property is wholly private land, and therefore, is not subject to the land use restrictions established by the Wilderness Act of 1964.

The remainder of the comment affirms the content of Section 4.3, "Wilderness" as it pertains to the significance of wilderness designation on private lands contained within or adjacent to designated wilderness areas.

WILMERHALE

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0071-2
cont'd

created by the Act is solely "composed of *federally owned* areas." *Id.* § 1131(a) (emphasis added).

The corollary, of course, is that non-federal land *cannot* be wilderness. Mr. Caldwell's property is private land, not federal land. It therefore is not and cannot be wilderness.

Granite Chief was designated as a wilderness by the California Wilderness Act of 1984. Like the earlier Wilderness Act, the California Wilderness Act applies only to federal land. It created the Granite Chief Wilderness exclusively from "certain lands within the Tahoe National Forest." Pub. L. No. 98-425, § 101(a)(10), 98 Stat. 1619, 1620 (1984).

Mr. Caldwell's private property is not "within the Tahoe National Forest." It thus could not have been, and in fact was not, included in the National Forest lands that became the Granite Chief Wilderness.

0071-3

2. Mr. Caldwell's private property is not subject to the land-use restrictions applicable to federally owned wilderness areas.

Even though Mr. Caldwell's private property is indisputably *not* part of Granite Chief, some continue to argue that it should nevertheless be subject to the same or similar land-use restrictions applicable to federally owned wilderness. There is no legal basis to do so; in fact, any such attempt would raise serious Constitutional questions under the Fifth Amendment's Takings Clause.

On this point, we have some concern that the DEIS/EIR's repeated use of the phrase "private lands within the congressionally mapped GCW" could be misleadingly employed by project opponents to suggest that Mr. Caldwell's property can be treated as anything other than wholly private land. *See, e.g.*, DEIS/EIR 4.3-1. Fortunately, the DEIS/EIR rightly clarifies that "the land use management direction and restrictions imposed by the federal Wilderness Act of 1964 apply only to, and have meaning only upon, federal lands. In other words, the land use restrictions of the Wilderness Act of 1964 do not apply to private parcels, including the Caldwell property." DEIS/EIR 4.3-2.

This conclusion is consistent with both the Wilderness Act's and the California Wilderness Act's recognition and preservation of the rights of existing private landowners. For example, the laws' land-use restrictions are subject to "existing private rights" and "valid existing rights." 16 U.S.C. § 1133(c); Pub. L. No. 98-425

0071-3 cont'd, Wilderness (W2)

0071-4, Wilderness (W2)

The comment affirms the conclusions reached in Section 4.3, "Wilderness." No further response is provided.

WILMERHALE

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0071-3
cont'd

§ 103(a). And private inholders are guaranteed rights of access to their properties. 16 U.S.C. § 1134(a); *see also* DEIS/EIR 4.3-5 (describing the Wilderness Act's protection of private-property rights).

Both the Wilderness Act and the California Wilderness Act also encourage the government to attempt to acquire private lands located within a designated wilderness area, either through purchase or exchange. 16 U.S.C. § 1134(a), (b); Pub. L. No. 98-425 § 103(c). This is further evidence that private land cannot be burdened by the same restrictions applicable to federally owned wilderness. If it could, there would be little reason for the government to acquire such private land; it could simply impose the desired limitations without incurring the costs associated with actually purchasing the property.

0071-4

3. Mr. Caldwell's past and current uses of his private property confirm it is not subject to wilderness-like land-use restrictions.

The Wilderness Act describes wilderness as "undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation," which is "untrammeled by man, where man himself is a visitor who does not remain." 16 U.S.C. § 1131(c). Thus, permanent roads, structures, and motorized transport are generally prohibited in wilderness areas. *Id.* § 1133(c).

No such restrictions apply to Mr. Caldwell's property, which is characterized by permanent roads and structures (including installed lift towers), dwellings, human habitation, and regular motorized transport. Indeed, the DEIS/EIR recognizes that a "road runs through a section of these private lands within the congressionally mapped GCW and is frequently used by the property owner." DEIS/EIR 4.3-2.

No government official has suggested that these activities are prohibited on Mr. Caldwell's property, and any such suggestion would be contrary to well-settled law. Thus, in addition to the fact that Mr. Caldwell's private property is not "Federal land" and thus by definition cannot be wilderness, Mr. Caldwell's past and current uses of his property further confirm that it is not part of Granite Chief—and that the Forest Service has not historically treated it as such, either legally or practically.

0071

0071-5, Wilderness (W2)

The comment affirms the conclusion reached in Section 4.3, "Wilderness," that the land use restrictions established by the Wilderness Act of 1964 cannot be imposed on the Caldwell property. No further response is provided.

WILMERHALE

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0071-5

4. Mr. Caldwell's private property is not "potential wilderness," and there is no authority to restrict his use of his property on that basis.

Some private parties have suggested that Mr. Caldwell's property should not be (further) developed based on the idea that the Forest Service, at some point in the future, might want to acquire the property and annex it to the wilderness. There is no legal authority, however, for the Forest Service to indefinitely treat Mr. Caldwell's property as "potential wilderness" and subject it to the same land-use restrictions as federally designated wilderness.

When Congress intends to designate non-wilderness land as "potential wilderness," it does so clearly and expressly—not with non-binding lines on a map, but with unambiguous statutory language. The California Wilderness Act, for example, identified by name certain non-wilderness lands to be considered for future wilderness designation (called "planning areas" or "potential wilderness"). Pub. L. No. 98-425 §§ 102, 106, 108. Mr. Caldwell's property was *not* on that list, nor was any land within or adjacent to Tahoe National Forest. This is a clear indication that Congress did not intend Mr. Caldwell's property to be treated as potential wilderness.

Moreover, even as to the lands that Congress did identify as potential wilderness in 1984, that was a temporary designation, not a permanent land status: the Secretary of Agriculture had four years to review the suitability of planning areas for inclusion as wilderness (*i.e.*, until 1988). Pub. L. No. 98-425 § 102(b). Thereafter, lands that did not become part of the wilderness would no longer be managed so as to preserve their "wilderness character." Given the strict four-year time limit imposed on lands actually designated as potential wilderness, there is clearly no justification for purporting to impose such land-use restrictions 30 years later on Mr. Caldwell's private property—which was never so designated.

Finally, to the extent the Forest Service desired to acquire Mr. Caldwell's property, the California Wilderness Act directed the Secretary of Agriculture to enter into negotiations to acquire the property via exchange or purchase. Pub. L. No. 98-425 § 103(c). Although 34 years have now passed since Granite Chief's designation, the Forest Service could still offer to purchase Mr. Caldwell's land and either maintain it as front country National Forest or seek to convert it to wilderness. What it *cannot* do, even if urged by others, is restrict Mr. Caldwell's use of his land as if such a sale and conversion has already taken place. Indeed, as already mentioned,

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0071-5 | any attempt to impose the Wilderness Act's land-use restrictions on Mr. Caldwell's
cont'd adjacent private property without just compensation could violate the Constitution.

0071-6 | **5. The DEIS/EIR erroneously found an “adverse effect” by impermissibly
applying wilderness criteria to Mr. Caldwell’s private property.**

As explained, the distinction in the law between wilderness and private land is clear, which the DEIS/EIR recognizes unequivocally in multiple places. *See, e.g.*, DEIS/EIR 4.3-2 (“[T]he land use restrictions of the Wilderness Act of 1964 do not apply to private parcels, including the Caldwell property”); *id.* at 4.3-5 (“These restrictions [imposed on federal wilderness areas] do not apply to private lands within congressionally mapped wilderness areas such as the Caldwell property.”). Yet despite acknowledging this distinction, the DEIS/EIR then inexplicably ignores it by including Impact 4.3-5 in its analysis.

The DEIS/EIR defines Impact 4.3-5 as “effects on potential wilderness characteristics on private lands within the congressionally mapped Granite Chief Wilderness.” *See* DEIS/EIR 4.3-13. It then concludes that, because the gondola’s proposed alignment under Alternative 2 “would reduce the untrammelled, undeveloped, and natural qualities” of *Mr. Caldwell’s* property (but *not* Granite Chief itself), it would have an “adverse effect” under NEPA.

This conclusion is contrary to law and directly contradicts statements elsewhere in the DEIS/EIR regarding the non-wilderness status of Mr. Caldwell’s private property. Indeed, in the paragraph immediately preceding the finding of an adverse effect, the DEIS/EIR acknowledges that development on Mr. Caldwell’s property is “legally permissible” because wilderness-like restrictions “apply only to NFS lands and cannot be enforced on private lands even if the private lands lie within the congressionally mapped wilderness boundary.” DEIS/EIR 4.3-13.

Only federally owned wilderness areas can and must be managed to retain their “untrammelled, undeveloped, and natural qualities.” That standard does not apply to non-wilderness lands. Because Mr. Caldwell’s private property is not wilderness, he has no obligation—and the Forest Service cannot constitutionally require him—to preserve his property as if it were wilderness. Nor, as just explained, is Mr. Caldwell’s property “potential wilderness”: it was not designated as such when Granite Chief was created, and even if it had been, that designation would have expired 30 years ago.

0071-5 cont’d, Wilderness (W2)

0071-6, Wilderness (W2)

Actual wilderness characteristics are not applied to the Caldwell Property under Impact 4.3-5 because they are not applicable for management of the privately owned Caldwell Property, as stated by the commenter. However, some discussion of the potential wilderness characteristics of the Caldwell Property is warranted for two reasons:

First, the indicator guiding analysis in this section explicitly calls for discussion of the private lands with congressional designation and the applicability of Forest Service management on those lands (please refer to page 4.3-8 of the Draft EIS/EIR).

As such, and contrary to the commenter’s closing point, the extent to which the Caldwell Property reflects potential wilderness characteristics is not irrelevant under NEPA. While the California Wilderness Act of 1984 did provide direction for the Forest Service to “...enter into negotiations to acquire by exchange all or part of any privately owned lands within the national forest wilderness areas designated by this title,” the Caldwell property owners have not in the past nor are they currently interested in conveying this property to the United States. The future acquisition of this property by the Forest Service, and its possible inclusion into the National Forest System-Granite Chief Wilderness (GCW), are beyond the scope of this analysis. While the development of private lands may negatively impact potential wilderness characteristics, those impacts may not necessarily be permanent nor would they preclude future inclusion of those lands into a National Forest System wilderness area if

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such private lands are acquired by the Forest Service in the future. In 2017, for example, private lands that previously contained roads and structures were acquired by the Forest Service and are now included within the National Forest System-GCW.

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0071-6 cont'd, Wilderness (W2)

0071-7, Wilderness (W2)

The comment affirms the conclusions reached in Section 4.3, "Wilderness." No further response is provided.

0071-6
cont'd


In short, only wilderness can be treated as wilderness. The Forest Service erred by imposing inapplicable wilderness criteria on Mr. Caldwell's private property to find an adverse effect under Alternative 2. The extent to which Mr. Caldwell's private property may reflect those wilderness characteristics now or in the future is simply irrelevant under NEPA. The DEIS/EIR's finding of an "adverse effect" is legally erroneous; the Final EIS/EIR should eliminate Impact 4.3-5 from its analysis.

* * *

0071-7

Mr. Caldwell's private property is not part of Granite Chief Wilderness, and an aspirational line on a map encroaching on his property does not change that fact. There is no lawful basis for treating his property as if it were wilderness, and land-use restrictions applicable only to federal wilderness areas may not be imposed on Mr. Caldwell's property without raising serious Constitutional concerns.

Sincerely,



Michael J.P. Hazel
Andrew L. Spielman
Counsel for Squaw Valley | Alpine Meadows

0072

0072-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.



Granite Chief Wilderness Protection League

June 11, 2018

Tahoe National Forest, Truckee RD
% NEPA Contractor
PO Box 2729
Frisco, CO 80443
Comments@squawalpinegondola-eis.com

Placer County Planning Department
Attn: Shirlee Herrington, Env. Coord. Services
3091 County Center DCr.
Auburn, CA 95603
cdraecs@placer.ca.gov

RE: Comments Regarding the Proposed Squaw Valley-Alpine Meadows Base-to-Base Gondola Draft EIR/EIS

Dear Ms Herrington and Mr Ilano:

0072-1

The Granite Chief Wilderness Protection League is deeply concerned about several issues either raised in the DEIR/DEIS, omitted or glossed over in the DEIR/DEIS.

Granite Chief Wilderness Protection League
P.O. Box 2244, Olympic Valley, CA 96146

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0072-2

The Public Interest

Fundamental to the NEPA and CEQA evaluations is determining what is in the public interest, or conversely, what is not in, or is detrimental, to the public interest. The DEIR/DEIS points out a number of project results that would diminish and adversely impact public resources and Public Trust Assets, including:

- Air quality and associated public health impacts in a location that already fails to meet state and federal clean air standards, including the additional air impacts related to White Wolf, two more chairlifts, more skiers and more transportation emissions.
- Noise, temporary and permanent, that will unequivocally diminishes the intrinsic value of quietness in the Granite Chief Wilderness, as well as in Alpine Meadows and on the Five Lakes Trail
- Permanent loss and likely direct “taking” of Federal and state wildlife Endangered Species and their habitat
- Visual resources permanently marred by Gasex Exploders, steel towers, cables, gondola cars, new roads in pristine locations, and other permanent scars on the landscape
- Permanent loss of a designated wilderness area (all three build alternatives include road construction inside the designated wilderness, thus denying that designated wilderness area from ever fulfilling the intent of the Congress and public, ie completing the federal protections intended for the Granite Chief Wilderness)
- Permanent traffic Level of Service degradations, on the public’s county and state roadways
- Greenhouse Gas Emissions increases when the county, state and federal governments should be refusing any activity that might contribute to further degradation of the public’s inherent and legal interests in a safe and healthy climate future
- Growth-inducing consequence of the proposed action in an environment already exceeding its carrying capacity (evidenced by poor to miserable traffic

0072-2, Other (O2)

The comment summarizes the commenter's view of the project's environmental impacts. The Draft EIS/EIR summarizes the project's significant impacts in Tables ES-3 and 2-3, and the project's significant and unavoidable impacts are identified in Section 5.2.1, "Significant Environmental Effects than Cannot Be Avoided." Each impact issue listed in the comment is evaluated in the EIS/EIR: Air Quality - Section 4.10; Noise - Section 4.9; Granite Chief Wilderness - Section 4.3; Trails - Section 4.1; Endangered Wildlife - Section 4.14; Visual Resources - Section 4.2; Traffic - Section 4.7; Greenhouse Gases - Section 4.11; Growth Inducing Impacts - Section 5.2.3.

The comment also states that “the narrow range of action alternatives fails to meet the intent and requirements” of CEQA and NEPA. See response to comment 0072-5, below, regarding the alternatives analysis. See response to comment 0072-6, below, regarding the Federal Transportation Act.

Granite Chief Wilderness Protection League
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0072-2
cont'd

conditions, non-compliance of air quality standards; non-compliance of water quality standards; housing crises for workers; and continued native species losses in Squaw and Alpine)

- * Permanent diminishment and loss of Federal Transportation Act Section 4(f) public resources

These impacts that would result from the gondola project are some of the 17 significant/adverse impacts of each of the build alternatives. Based on federal and state case law we submit that the narrow range of action alternatives fails to meet the intent and requirements of the applicable laws. Please provide further discussions in the Final regarding the justification for such narrowly framed alternatives that provide little to no relief of the many adverse impacts. How will the two agencies assess the public interests tied to the loss and degradation of all these natural and social resources? How will you help the public understand the “weight” of the range and extent of these public resource impacts compared to a seasonal convenience of a small population?

0072-3

The Public Interest is served when the project’s Purpose and Need (Federal) and the project Purpose and Objectives (county) are evaluated and weighed against the adverse impacts and potential diminishment of public resources.

The Federal “Purpose” per the DEIS is to “improve developed winter recreation opportunities...” The Federal “Need” is to respond to a request from Squaw Valley to amend the Special Use Permit so they can “improve connectivity between Alpine Meadows and Squaw Valley.” The several factors driving this need are convenience-based (see page 1-4). The Federal planning and management documents the Forest Service is using to determine use consistency (per the DEIS/DEIR) are 28 years old and outdated re: species protections, GHG’s, traffic, water quality, air quality, light pollution, recreation trends and other resource considerations. The FEIR/FEIS should describe the shortfalls of those planning documents and how the TNF is employing relevant considerations to meet today’s public interest obligations.

0072-4

Placer County’s stated “Purpose” is to provide “more convenient access to skiable terrain and resort amenities.” The Objectives of the county include more convenient access, maybe faster inter- resort access, less shuttle service, easier access to existing terrain, and infrastructure to serve the gondola (Gasex Exploders, , etc).

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0072-2 cont'd, Other (O2)

0072-3, Purpose and Need (P&N)

The proposed project would require an amendment to the existing Forest Service Special Use Permit (SUP) issued for the operation and maintenance of Alpine Meadows. SUPs and amendments to SUPs must be consistent with the applicable Forest Plan. The TNF Land and Resource Management Plan (Forest Plan) (1990) and the Sierra Nevada Forest Plan Amendment (2004) provide the most up-to-date guidance from the Forest Service on management of Tahoe National Forest lands, and SUPs must be consistent with those documents.

Discussion of the perceived shortfalls of the Forest Plan and Sierra Nevada Forest Plan Amendment would extend beyond the scope of this analysis.

0072-4, Purpose and Need (P&N)

As is directed by NEPA and CEQA statutory guidelines, the Draft EIS/EIR analyzes potential impacts to the environment that would result from implementation of the proposed project. The goal of the Draft EIS/EIR is to provide clear analysis of impacts that would occur to individual resources.

Weighing of beneficial and adverse impacts is the role of the respective decisionmakers. The EIS/EIR is intended to provide the decisionmakers with the best available data and analysis related to potential impacts on individual resources; with that information, the decisionmakers will determine whether or not the project, with all of its impacts (both beneficial and adverse/significant), would meet

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the project's identified purpose and need and/or CEQA project objectives. Skier convenience is not an environmental impact, and is therefore not quantified in the EIS/EIR.

Please refer to the Draft Record of Decision and the Placer County Board of Supervisors decision on this project, which provide detailed rationale on how the project would or would not meet the project's identified Forest Service purpose and need and/or CEQA project objectives.

This comment will be forwarded to the Forest Supervisor of the TNF and the Placer County Planning Commission and Board of Supervisors to take into consideration when making a decision regarding the project.

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cont'd

Given these county and Federal purpose, need and objective statements we are struck by the fact that the project has limited benefits to the general public; especially all non-skiers, skiers that choose one resort or the other for a given day, skiers that don't want Alpine any "closer" to Squaw, and the tens of thousands of hikers that would have to cross under the gondola facilities throughout the (expanding) hiking seasons. The "convenience" need is, based on the DEIR/DEIS (pages 1-2 and 1-3), for an apparently small segment of the winter skier population at Squaw or Alpine (less than 5%).

We ask the Final EIR/EIS to provide clear and rational discussion and analysis of the "skier convenience." How will "convenience" be quantified for decision-makers and how this "convenience" will be weighed against the substantial adverse impacts to the public's resources. This "weighing" exercise will be particularly relevant for the public's understanding of the selection of a narrow set of alternatives. This discussion would also help the public understand how "significance" of impacts is balanced against "convenience" of a select population group. The FEIR/S could also set a clearer stage for the subsequent regulatory tests anticipated, given the significance of impacts to such a wide range of resources the public has deemed valuable and worth protecting (air quality, visual resources, hiking trails, Wilderness, water quality, night sky, endangered species, etc).

We ask that the Forest Service and the county define the thresholds for allowing irreversible and irretrievable environmental impacts when Alternatives 2, 3 and 4 are driven by no more than "skier convenience."

Alternatives

0072-5

NEPA and the federal courts are clear: agencies must "*rigorously explore and objectively evaluate all reasonable alternatives.*" In CEQA case law we find that "*without meaningful analysis of alternatives in the DEIR neither the courts nor the public can fulfill their proper roles in the CEQA process.*" Given the purpose and need declarations in the DEIR/S several other alternatives warrant full NEPA and CEQA analysis. We find the DEIR/S deficient in it's overly narrow and deceptive selection of three build alternatives, all dependent on a gondola and all located to serve a future resort development.

0072-6

Per the Federal Endangered Species Act (ESA) the project must fully consider all "Reasonable and Prudent Alternatives" (RPAs) that would avoid impacts to any

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0072-4 cont'd, Purpose and Need (P&N)

0072-5, Alternatives (A)

In September 2015 and October 2015, the Tahoe National Forest (TNF) and County, respectively, accepted applications from Squaw Valley Ski Holdings, LLC (SVSH), the project proponent, to install, operate, and maintain an aerial ropeway system (gondola) connecting the Squaw Valley and Alpine Meadows ski areas. The TNF needs to respond to SVSH's land use application, which proposes additional lift infrastructure be approved to improve connectivity between Alpine Meadows and Squaw Valley. Placer County's responsibility under CEQA is predicated upon the review of an application for a conditional use permit and Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) amendment. Thus, this applicant -proposed NEPA/CEQA analysis process is driven by the Proposed Action put forth by SVSH, as described in Section 2.2.2 of the Draft EIS/EIR. In response to issues identified internally by the Forest Service and Placer County, and externally by the public during the scoping process, a reasonable range of alternatives was developed to meet the project objectives. The EIS/EIR analyzes in detail the No Action Alternative and three action alternatives. Strong indicators of impact differences between the action alternatives (Key Issues) are discussed in Section 2.4.1 of the EIS/EIR. Additionally, four alternatives were considered but eliminated from detailed analysis, including improvements to the existing shuttle system, alternative route alignments, a buffer zone around the National Forest System-Granite Chief Wilderness, and alternative technologies. These alternatives were ultimately eliminated from detailed analysis because they failed to meet the Forest

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Service purpose and need and/or the CEQA project objectives. Section 2.3 of the Final EIS/EIR provides additional information on these alternatives considered but not evaluated further, and provides rationale related to why they were eliminated from detailed analysis.

0072-6, Alternatives (A)

The comment states that the Endangered Species Act requires consideration of all "Reasonable and Prudent Alternatives" that would avoid impacts to endangered or threatened species and their habitats. As set forth in the Draft EIS/EIR, the action alternatives would have direct and indirect effects on SNYLF critical habitat. The project incorporates multiple RPMs to lessen these impacts, to the extent feasible, as required by Forest Service and Placer County policy. For those impacts that cannot feasibly be avoided, mitigation is recommended that would require compensatory habitat at a 3:1 ratio. For this reason, the project would not result in a net reduction of SNYLF critical habitat (please refer to the discussion contained within Impacts 4.14-1 and 4.14-2 of the EIS/EIR, and pages 2-38 through 2-40 of the Draft EIS/EIR).

In addition, the EIS/EIR considers alternative gondola alignments that would minimize potential impacts to SNYLF (Alternatives 3 and 4).

For further information on the development of alternatives that were analyzed in detail in the EIS/EIR, as well as those alternatives that were ultimately eliminated from detailed analysis in the EIS/EIR, please refer to comment response #0072-5 immediately above. With respect to shuttle/ground transportation alternatives, see the Master Response entitled "Improvements to Existing Shuttle

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System Alternative," in Section 1.8, "Master Responses." Also see Section 2.3.2 of the Draft EIS/EIR where alternatives considered but not evaluated further are analyzed, including multiple alternative route alignments and a buffer zone around wilderness alternative.

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0072-6
cont'd

endangered or threatened species and their habitats. Given that the purpose of the gondola is for intermittent (day-by-day) skier convenience, these alternatives do not include the full range of RPAs that are available to the applicant. The DEIR/DEIS is insufficient in this regard and we request that the Final EIR/S describe and fully evaluate other alternatives that would meet the “convenience” purpose of the gondola. Alternatives we would expect the courts to require include, at the least, various shuttle/ground transportation options and gondola routes near the already built (but never operated) Caldwell “Chairlift #1.”

0072-7

Under the US Transportation Act Section 4(f), per the statute, the regulatory language and US Supreme Court decisions, this gondola would, under all three build alternatives, fall within the Section 4(f) provisions and requirements for compliance. Thus the action alternatives must include all “Feasible and Prudent Alternatives” that would avoid the identified adverse impacts to the Granite Chief Wilderness, the Five Lakes Basin and the Five Lakes Trail. Again, the DEIR/S action alternatives fail to include “feasible and prudent alternatives” that would avoid or greatly reduce impacts to Section 4(f) resources. The Final EIR/EIS must include alternatives that meet the purpose and intent of this law.

Public Trust Protections

0072-8

As we stated in scoping comments the Designated Granite Chief Wilderness, the Five Lakes Basin, the Five Lakes Trail, at-risk-species and associated natural resources are Public Trust Assets and must be protected by our government agencies for the use and enjoyment of present and future generations. The DEIR/S fails to describe the Public Trust Assets the USFS has responsibility to steward and protect. The EIR/EIS should describe the responsibilities of the US Forest Service for Trust Assets the USFS stewards for the beneficiaries of these resources. The US and the California Supreme Courts have determined that public agencies hold Public Trust responsibilities for protection of Public Trust resources. The Final EIR/S needs to include descriptions of the trust assets potentially effected by the action alternatives and how those trust resources will be appropriately stewarded for future generations.

Irrevocable Loss of Wilderness

0072-9

The Granite Chief Wilderness is a Public Trust Resource (or, Trust Asset). The designation of this Wilderness by Congress was based on a sincere and dedicated public campaign to permanently protect the wilderness values for future

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0072-6 cont'd, Alternatives (A)

0072-7, Alternatives (A)

The comment states that the alternatives analysis in the Draft EIS/EIR does not comply with Section 4(f) of the Department of Transportation Act. For a discussion of this statute, and its applicability to the project, please see response to comment #0166-48.

0072-8, Wilderness (W2)

Public trust assets like the GCW, Five Lakes Basin, Five Lakes Trail and at-risk-species were wholly analyzed in the Draft EIS/EIR. Please refer to Section 4.3, "Wilderness" for discussion of potential impacts to the GCW; Section 4.1, "Recreation" for discussion of potential impacts to the Five Lakes Basin and Five Lakes Trail; and Section 4.14, "Wildlife and Aquatics" for discussion of potential impacts to special-status wildlife species.

0072-9, Wilderness (W2)

The potential wilderness characteristics of the Caldwell property do not currently remain intact, as there is an existing segment of low standard, native surface road on the land, as well as a single family residence, outbuildings and an incomplete, private ski lift referred to as "KT South." Please refer to Pages 4.3-4 and 4.3-13 of Section 4.3, "Wilderness."

The proposed temporary road for construction would be located on private lands within the congressionally mapped GCW, where the land use restrictions established by the Wilderness Act of

0072

1964 do not apply. Still, Impact 4.3-5 discusses the impacts that implementation of any of the action alternatives (including construction of the temporary road for construction) would have on the potential wilderness characteristics of those private lands within the congressionally mapped GCW (i.e., the Caldwell property).

If the project were to be approved, the decisionmaker maintains the authority to condition specific project components (i.e., approve installation of the gondola but deny the use of a temporary road for construction); however, an action alternative excluding this temporary road for construction is not required.

0072

0072-9
cont'd

generations. The boundary was mapped to protect the vital features of the wilderness, including the intent to protect the Area from ski development (per the Congressional Record). The USFS failed in its charge from Congress to purchase all lands within the designated boundary, leaving a piece of the boundary outside federal ownership. That piece of land is still available for permanent protection as all its wilderness values remain in tact. (In fact, the property owner has been approached by private parties to “do the right thing” and sell that undevelopable piece at full value, for the public good).

However, the three build alternatives all provide for a “temporary road for construction” to be built inside the Wilderness Boundary. The Forest Service owes the public the full disclosure of how that road could, or would, irrevocably deny the public the opportunity to see and experience the completion of the Granite Chief Wilderness. We find the DEIR/S arguably cavalier in its treatment of this access road. The construction of that road would take away something irreplaceable, irrevocable and of national interest. A build alternative that does not include this road must be included for full evaluation in the FEIR/S. Any claim that an alternative construction access road is not feasible will be met with great skepticism and would require extensive technical documentation in the FEIR/S.

White Wolf Development

0072-10

Reading the DEIR/S and the narrow choices of build alternatives leads the reader to conclude that there are operational and infrastructure relationships between the White Wolf development, completion of the existing partially built Caldwell chairlift #1 and the additional chairlift Caldwell and Squaw have been promoting (developing Estelle Bowl via the Rollers chairlift). If there is no relationship between one or more of these anticipated developments, please explain why these three gondola routes all purposely connect to the White Wolf Resort?

The EIR/S is deficient in disclosing to the public the relationship of the three build alignments with the other developments that Mr. Caldwell has been promoting for his property. Please describe the operational relationships and the potential dependencies between these developments. What are the cumulative impacts that the gondola would trigger at White Wolf? As reviewers of the EIR/S we are lacking an understanding of how these “separate” projects are financially or operationally inter-related and/or inter-connected. If in fact the build alternatives are to serve White Wolf, is that why we do not see alternatives further east (that would substantively reduce several significant impacts described in the DEIR/S)?

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0072-9 cont'd, Wilderness (W2)

0072-10, Cumulative Effects (CE)

See responses to comments 0072-5 and 0072-6, above, regarding the range of alternatives evaluated in the Draft EIS/EIR and the alternatives considered but eliminated from further evaluation.

The White Wolf Project and the Rollers lift are included in Table 3-3 and Exhibit 3-1 of the Draft EIS/EIR as projects considered in the cumulative effects analysis. (Draft EIS/EIR, pp. 3-12, 3-13, 3-14; see Alpine Meadows Master Development Plan, Table 3-3 entry #1, for Rollers Chair.) See response to comment 0166-6 regarding the White Wolf Project and its relationship to the proposed gondola project. The Rollers lift is a planned but unpermitted and unimplemented chairlift (proposed as part of the *Alpine Meadows Ski Area Master Development Plan* [Tahoe National Forest 2015]). Its bottom terminal would be near the Alpine Meadows mid-station under Alternative 2 (meaning that under Alternative 2, skiers could exit the gondola at the Alpine Meadows mid-station and ski/walk to the Rollers lift).

Caldwell's chairlift #1 (referred to in the Draft EIS/EIR as “KT South”) is an existing chairlift and is therefore considered as part of the existing setting for purposes of the cumulative impacts analysis. (See Draft EIS/EIR, page 3-11 [“past and current projects in the project vicinity were also considered as part of the cumulative setting, as they contribute to the existing conditions/baseline upon which the alternatives and each probable future project's environmental effects are compared, but are not listed in Table 3-3.”].) It is not reasonably foreseeable that the chairlift would be operated

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because there are no known plans for operation at this time. In addition, even if the chairlift were operated, it is a private chairlift and is approved for use only by friends and guests of the property owner with a limit of 25 users per day. The lift also cannot be operated for commercial purposes. Because use of the chairlift would be limited in these ways (per the conditions of approval issued by Placer County) it would not add substantially to traffic, noise, recreational, or other impacts and would not alter the evaluation of cumulative effects of the gondola project in connection with other probable future projects evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR.

The White Wolf Project would be located on the privately owned Caldwell lands located between Squaw Valley and Alpine Meadows, and would include a 38-lot subdivision, a clubhouse/lodge, a chairlift, and seasonal recreational facilities. For all three action alternatives, the proposed gondola alignments would be partially constructed and operated within the White Wolf property.

Completion of the gondola project is independent of the White Wolf Project, and similarly, the White Wolf Project is moving forward independent of the gondola project. Although both projects share a geographic location, neither project has dependency on the other to move forward. In other words, from a CEQA standpoint, they are considered to have "independent utility." Thus, the White Wolf development is not, nor should it be, part of the purpose and need and project objectives of the proposed gondola project.

An Environmental Questionnaire application for the White Wolf project was provided to Placer County in 2016 and its status was incomplete at the time the

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Draft EIS/EIR was released. However, the application is now completed. Completion of the gondola project is independent of the White Wolf project, and similarly the White Wolf project is moving forward independent of the gondola.

The Rollers lift is a planned but unpermitted and unimplemented chairlift (proposed as part of the Alpine Meadows Master Development Plan). Its bottom terminal would be near the Alpine Meadows mid-station under Alternative 2 (meaning that under Alternative 2, skiers could exit the gondola at the Alpine Meadows mid-station and ski/walk to the Rollers lift). The Rollers lift is included in the Draft EIS/EIR's list of cumulative projects (see Table 3-3 and Exhibit 3-1; see Alpine Meadows Master Development Plan, map label 1) and cumulative effects of both project being in operation are addressed in the EIS/EIR cumulative effects analysis.

0072

0072-10
cont'd

Should the White Wolf connection be part of the project purpose and objectives? Please explain. Why did the DEIR/S choose to not seriously evaluate direct, indirect and cumulative impacts of these four developments (gondola, Caldwell chair #1, White Wolf and Estelle Bowl/Rollers chair)?

GHG's

0072-11

The action alternatives have greater GHG impacts than the DEIR/S discloses. Several sources, both during construction and long term operations and maintenance, will have emissions that are not disclosed in the DEIR/S (tower excavations, buildings construction, Gasex operations, timber operations, etc). Additionally, increases in skier days expected by Squaw include more air travel and more distance auto travel (Sacramento, San Francisco, San Jose, etc). These are indirect and cumulative impacts that are a legitimate and important concern of the public, as it does directly impact our climate. These are land use and Forest Use issues, not to be kicked down the road to another agency.

The DEIR/S states that even though there will be increased emissions (which the FEIR/S needs to more accurately estimate) the document dismisses these emissions as insignificant. We find this conclusion inappropriate and regrettable for public agencies to claim. The Final EIR/S should instead demonstrate how a project can in fact achieve zero, or close to zero, net emissions. All credible science points to the desperate and unequivocal need for all entities to achieve zero GHG emissions. The applicant (and USFS and county) has numerous opportunities to substantively offset the carbon footprint of this project. We request the county and the USFS to step up and actively help the applicant identify and implement GHG reductions and offsets. Squaw claims to be "green" after all. It is not in the public interest to give a free pass on emissions.

Gasex Exploders

0072-12

Recent experience in Alpine Meadows with the just-installed Gasex Exploders above Alpine Meadows Rd indicates far greater noise and vibration impacts than the DEIR/S describes. Residents experienced "very loud," "frightening" and "house shaking" when an exploder was recently set off. The eight proposed exploders are not necessary without a gondola. Eight exploders appear to present a potentially very significant noise and disturbance intrusion on all residents of Alpine Meadows. The DEIR/S appears dismissive as to the human and wildlife impacts of these exploders. More detailed and thorough evaluations of the actual

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0072-10 cont'd, Cumulative Effects (CE)

0072-11, Greenhouse Gases (GHG)

The comment states that greenhouse gas (GHG) emissions were not sufficiently quantified for both construction and operations. It further states that increases in skier days would result in more air and auto travel-associated GHG emissions that were not quantified. The comment disagrees with the less-than-significant conclusion and recommends the project achieve zero GHG emissions.

Emissions associated with construction and operation of the project are shown, by source, in Table 4.11-1 of the Draft EIS/EIR. Construction activities that were evaluated included site preparation, grading, building construction, and mobile-sources from worker commute, vendor deliveries, and material hauling activities. Operational-related emissions included increases in vehicle traffic associated with increased skier days, operation of the gondola, and long-term maintenance activities.

The comment states that the Draft EIS/EIR failed to calculate the GHG emissions from timber operations. The discussion of Impact 4.12-3 in the Draft EIS/EIR provides an estimate of the number of trees removed under each alternative, up to 328 trees under Alternative 2, up to 237 trees under Alternative 3, and up to 214 trees under Alternative 4. Marketable trees would be removed for processing into lumber. As described on page 2.13 of the Draft EIS/EIR, "tree removal would be accomplished via helicopter, skidding, hauling off-site, chipping, or lop-and-scatter, depending on the specific site conditions and accessibility." RPMs

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TREE-1 through TREE-12 provide numerous details on methods of tree removal and treatment of slash and other non-marketable materials. GHG emissions associated with tree removal were not quantified in the Draft EIS/EIR. Additional analysis that quantifies emissions associated with truck hauling was conducted subsequent to release of the Draft EIS/EIR, in response to comments from the public. The analysis is provided herein and Appendix G, as revised. To provide a conservative estimate, the maximum total number of trees that could be removed under any alternative, 328 trees under Alternative 2, was rounded up to 350 trees. Based on project-specific arborist's survey data, the average tree diameter on the project site is 17 inches (Under the Trees 2015, 2016, 2017). Based on a study conducted by the University of Arkansas, conifer trees with a diameter of 17 inches can weigh 3,344 pounds (2013). Logging trucks typically have a capacity of 26 tons (USDA 2004). Thus, 350 trees would result in 585 tons of haul material requiring up to 23 truckloads. Assuming each truck leaves the site full and returns empty, a total of 46 truck trips would be required. Using CalEEMod and the construction material hauling component, the analysis estimates that tree hauling would result in a maximum of 3.6 metric tons (MT) of CO₂. When combined with reported construction emissions in Table 4.11-1 of the Draft EIS/EIR, maximum emissions still remain below applicable PCAPCD thresholds of significance by several hundred MT CO₂e/year. Calculations are provided in Appendix G of the Final EIS/EIR.

Emissions were also calculated for the construction and operation of the Gazex facilities. The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft

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EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project. With Gazex removed, GHG emissions from these facilities have been removed from the Final EIS/EIR, as shown in Section 4.11, "Greenhouse Gas Emissions and Climate Change," as revised, and Appendix G, as revised.

The assumptions in the GHG analysis are conservative. Mobile-source emissions were quantified using traffic estimates associated with increases in skier days. (Draft EIS/EIR, p. 4.11-11.) As discussed in Chapter 4.7, "Transportation and Circulation," on page 4.7-18, "the analysis conservatively assumes all skiers (under both existing and cumulative conditions) would be day skiers who enter and then exit each resort in a single day." It is likely that a portion of any increases in visitation to Squaw Valley and Alpine Meadows as a result of the project would come from people already traveling to the Lake Tahoe region for recreational purposes, and the project would not result in increased regional travel-related trips or emissions. However, the traffic analysis did not make adjustments for this likelihood, but rather assumed conservatively that all new trips would go to and from Squaw Valley or Alpine Meadows to other surrounding regions.

Additional people flying to the Lake Tahoe Region attributable to the proposed project is highly unlikely to result in additional flights being added by airlines. An airline is a form of mass transit and adding a small number of new passengers is not enough to add a new flight to an existing route. Typically, for an airline to add flights to an existing route, or start

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flights on a new route, sufficient demand must be present to regularly fill a large portion of an entire aircraft. Any added airline passengers attributable to the proposed project would be distributed among various origin airports and various airlines. The proposed project would not generate sufficient new airline passengers departing from one particular airport, on one particular airline, to result in that airline sufficiently filling a plane on a regular basis to add a flight from that airport to an airport serving the project site (i.e., Reno International Airport or Sacramento International Airport). So the number of flights to the region would not change. Further, even if there was the potential to increase flights to the region, there is no practical way to estimate potential increases in air travel relate GHG emissions given that air passengers would be originating from multiple possible locations and would use various possible airlines (as described above) and this analysis would be far too speculative to include in an EIS/EIR. The GHG analysis adequately evaluates the potential increases in construction and operational GHG emissions.

Regarding the significance conclusion, as discussed on page 4.11-9, PCAPCD has adopted construction thresholds of significance of 10,000 metric tons of carbon dioxide equivalent (CO₂e)/year and operational thresholds of significance of 1,100 MT CO₂e/year. PCAPCD, the agency with authority over air quality and emissions in the project area, has not adopted a zero net emissions threshold, and one is not necessary to comply with applicable laws and regulations regarding GHG emissions. Discussions for Impact 4.11-2 (Alt.2), Impact 4.11-1 (Alt. 3), and Impact 4.11-1 (Alt. 4) compared project construction and operational emissions to these thresholds and the analysis shows the project would not exceed either one. The EIS/EIR appropriately

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determines that the project would have less-than-significant impacts on GHG emissions. No further analysis or mitigation is necessary.

0072-12, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

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0072-12
cont'd

magnitude of noise in Alpine Meadows (not data from vendors) is needed. Also, the likely use of the exploders during sleeping hours needs far more discussion and assessment.

Traffic

0072-13

Traffic impacts and mitigations are weak and deceptive. The gondola, touted as a traffic improvement project, in fact quantitatively lowers the Level of Service at Squaw. The analyses fails to provide the information necessary to understand the impacts of the gondola triggering the White Wolf Development, or the gondola's increasing of overall visitor uses at both ski areas. Traffic at Alpine and Squaw, as well as along Hiway 89, have increasing days and weekends of "failure" (no-movement, stand still traffic). The FEIR/S should be more transparent in the realities of these roadways.

The proposed mitigation in Squaw relies on a management and operations system that fails at a regular and predictable frequency. The Fire Department stated that "virtually all of the current issues with traffic and circulation...at Squaw, SR 28, Donner Pass Rd, SR 89 and I-80 East..." have their basis in poor planning and management at Squaw. Please explain how the proposed mitigation would work, given these realities? How will Squaw-Alpine actually operate and manage differently, as the current systems lack credibility for implementing the proposed project mitigations.

0072-14

The DEIR/S is a massive document at a rounded 1,700 pages. It is a difficult undertaking for the public. We ask that public meetings or hearings be scheduled to give the public the opportunity to have meaningful discussions about the proposed project, once the agencies have reviewed the comments but before the Final is prepared. We believe this would provide a more helpful and transparent review of key issues.

Thank you for your consideration of these comments.

Sincerely,

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0072-12 cont'd, Noise (N)

0072-13, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment states that the Draft EIS/EIR fails to provide information necessary to understand that impacts of the gondola triggering the White Wolf development or the gondola's increasing of visitor uses at both ski areas. However, the comment provides no specific details on where the analysis in the Draft EIS/EIR may be lacking.

The Draft EIS/EIR provides an in-depth discussion of how the number of new skier visits per year was estimated and the impacts of those skiers.

The proposed gondola project would not "trigger" the White Wolf Project. See response to comment 0166 -6 for additional explanation of the two separate projects. The White Wolf Project is included in the cumulative impact analysis, and the cumulative traffic analysis considers concurrent operation of the proposed gondola project and the White Wolf Project. (See Draft EIS/EIR, Table 3-3, project #9; Section 4.7.4.)

Regarding the implementation of mitigation measures, both Placer County and the Forest Service would have regulatory authority to enforce the implementation of mitigation measures. Through the issuance of each agency's respective permits, each agency has the authority to require the project applicant to adequately implement both mitigation measures and RPMs included in the EIS/EIR.

0072-14, NEPA/CEQA Process (NCP)

0072

Chapter 6, "Consultation and Coordination," of the Draft EIS/EIR describes the public involvement process conducted to date for this project, including the opportunities for public input at scoping meetings and through written scoping comments. Please also refer to Section 1.6 of the Draft EIS/EIR for further details on the public involvement process (including the scoping process, public comment period, and the creation of a revised Final EIS/EIR). The Forest Service, the County, and the project applicant continue to work individually with residents, homeowner's groups, and agencies to respond to concerns. Going forward, several meetings and hearings will be held as part of the project approval process, and the public is invited to attend and provide comments at these meetings, which will include: the Squaw Valley Municipal Advisory Council, the North Tahoe Regional Advisory Council, the Placer County Planning Commission, and the Placer County Board of Supervisors.



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SENT VIA ELECTRONIC MAIL

June 11, 2018

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Comments Re: Alpine Meadow Squaw Valley Gondola Comments: Draft EIS/EIR SCH#
 2016042066

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") on the Draft Environmental Impact Statement/Environmental Impact Report ("DEIS/R") for the proposed Squaw Valley Alpine Meadows Base-to-Base Gondola Project (the "gondola" or "project").

The Center opposes the project and considers the DEIS/R to be inadequate for several reasons. The DEIS/R does not consider an adequate number of project alternatives under CEQA. It also fails to adequately consider the visual impairment to the region which includes the Granite Chief Wilderness ("GCW"), a part of the National Wilderness Preservation System, and it does not adequately address the potential increase in visitors to the area and the cumulative effect of increased human traffic on the proximity to the GCW. The DEIS/R should be revised to adequately consider the impacts of the project and the installation of Gazex exploders on the survival, recovery, and the critical habitat of the Sierra Nevada yellow-legged frog ("SNYLF"). The project has multiple adverse and significant and unavoidable impacts under each action alternative that demonstrate the need for new alternatives and serious consideration about proceeding with the project.

The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental

Alaska • Arizona • California • Florida • Minnesota • Nevada • New Mexico • New York • Oregon • Vermont • Washington, DC

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0097-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0097-1

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0097-1
cont'd

law. The Center has over 1.6 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water, and overall quality of life for people in Northern California.

I. The DEIS/R is Inadequate Because it Fails to Analyze a Reasonable Range of Alternatives as Required by CEQA

CEQA requires that agencies identify project alternatives in their environmental impact reports. (Cal. Pub. Res. Code § 21002.1(a).) An EIR “shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” (Cal. Code Regs. tit. 14, §15126.6 (a) (2018).) While an EIR “need not consider every conceivable alternative,” it must still “consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation.” (*Id.*) Furthermore, alternatives are feasible even if they would “impede to some degree the attainment of the project objectives, or would be more costly.” (*Id.*)

0097-2

The DEIS/R does not adequately address a reasonable range of feasible alternatives. The DEIS/R identifies four project alternatives—alternative 1, the “no-action alternative”, alternative 2, the “proposed action”, and alternatives 3 and 4. Alternatives 3 and 4 are two modifications of the project route proposed in alternative 2. All action alternatives result in the construction of a gondola between the Alpine Meadow and Squaw Valley ski areas. The action alternatives do not provide the public with an alternative to the construction of a gondola, despite the additional project alternatives that were proposed during the scoping process, and are therefore inadequate under CEQA/NEPA.

0097-3

A. The discussion of feasible alternatives is inadequate because the DEIS/R dismissed expansion of the existing inter-resort shuttle system for failing to meet the purpose and need of the project. (DEIS/R at 2-30.)

CEQA guidelines state that “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, *even if* these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (Cal. Code Regs. tit. 14, §15126.6(b) (2018) emphasis added.)

Project proponent states that the gondola is needed to “improve the connectivity between Squaw Valley and Alpine Meadows to allow visitors of both areas easier access to the varied terrain and amenities at the other area.” Thus, the project seeks to “enhance the visitor wintertime experience at both Squaw Valley and Alpine Meadows by providing direct connection between the ski areas for more convenient access to skiable terrain and resort amenities.” (DEIS/R at ES-2.)

Currently, “visitors are granted access to both areas with the same lift ticket; however visitors seeking to access the alternate regions must currently drive independently or take shuttle between the two regions.” (DEIS/R at 1-4.) The DEIS/R erroneously dismissed consideration of

0097-1 cont'd, Summary (S2)

0097-2, Alternatives (A)

The comment states that the Draft EIS/EIR does not consider a reasonable range of feasible alternatives. Please see response to comment #0072-5 for a description of the alternatives analysis provided in the Draft EIS/EIR.

0097-3, Alternatives (A)

The comment states that the Draft EIS/EIR “erroneously dismissed consideration of an expanded and improve shuttle system.” Section 2.3.2.1 of the Draft EIS/EIR describes the “Improvements to Existing Shuttle System Alternative,” and explains why this alternative was considered but not evaluated further in the Draft EIS/EIR (page 2-30 of the Draft EIS/EIR). In addition, the Master Response entitled “Improvements to Existing Shuttle System Alternative” further explains why the alternative would not meet the purpose and need under NEPA or the project objectives under CEQA, and explains that implementation of the alternative would be functionally identical to the No Action Alternative. Therefore, the alternative was not carried forward in the Final EIS/EIR for further evaluation.

The comment suggests that expansion of the existing inter-resort shuttle would eliminate all significant and unavoidable adverse impacts identified in the Draft EIS/EIR for all the action alternatives. However, an expanded shuttle service would increase vehicle trips on the local roadway network, and therefore, could generate significant

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and unavoidable traffic impacts similar to those identified in the EIS/EIR for the action alternatives (in particular, please refer to analysis provided under Impact 4.7-4 for the action alternatives).

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0097-3 cont'd, Alternatives (A)

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an expanded and improved shuttle system because “guests do not presently find it convenient and/or effective to shuttle between the two resorts” and because they “do not perceive time spent riding a shuttle bus to be part of their recreation experience, whereas, time spent on a lift, even if the lift is simply a transit conveyance, is perceived to be part of their skiing day.” (DEIS/R at 2-30.)

The Squaw/Alpine Express (“shuttle”) runs daily between the two resort areas. The shuttle picks up every 20-30 minutes during the week with increased frequency on weekends and holidays. (<http://squawalpine.com/explore/more/getting-around-parking>.) Proponent contends that the shuttle in its existing state does not meet the needs or purpose of the project. (DEIS/R at 2-30.) However, in dismissing this alternative without analysis in the DEIS/R, the proponent did not provide information that supports the contention that expansion of the shuttle fleet size, increased frequency of trips, and increased visibility and marketing of the available or expanded shuttle services to guests would not expand usage and adequately address the needs of the project. (*Id.*) Furthermore, the DEIS/R states that the shuttle transport time ranges from 15-30 minutes, depending on traffic conditions, not including the wait to board. (*Id.*) Similarly, the travel time of the project is estimated to be 16 minutes not including wait; therefore the existing shuttle service is comparable in travel time to the gondola alternatives under some traffic conditions.¹ CEQA includes the consideration of feasible alternatives that “would impede to some degree the attainment of the project objectives, or would be more costly.” (Cal. Code Regs. tit. 14, §15126.6(b).) The expansion of the current inter-resort shuttle system should be considered a feasible alternative and analyzed in the DEIS/R, because it still allows for the attainment of some project objectives.

Without further analysis in the DEIS/R, there is not conclusive information that supports proponent’s contention that expanding the shuttle fleet size, increasing the frequency of trips, and/or increasing visibility and marketing of the shuttle services to guests would not expand usage and adequately address the needs of the project. Furthermore, the expansion of the existing inter-resort shuttle system would eliminate the significant adverse environmental impacts that are unavoidable under all but the no action alternative, even with implementation of Resource Protection Measures (“RPMs”). An expansion of the current shuttle system would not require new construction and operation of a gondola, and it can be implemented with vehicles that use alternative energy, fuels, or some combination of alternative energy sources, which would not increase emissions of atmospheric gases or particulate matter.² (DEIS/R at 2-32–36.) The significant adverse environmental impacts that are associated with each of the action alternatives in the DEIS/R stem from the construction and operation of the gondola. Expansion and/or improvements to the existing inter-resort shuttle system would eliminate the permanent visual impairment to the GCW area both the permanent and temporary destruction and modification of SNYLF critical habitat. Thus, the DEIS/R does not provide a reasonable range of alternatives to the proposed project and should include an analysis of an expanded inter-resort shuttle system as an action alternative. At minimum, the DEIS/R should be revised to consider the expansion of the shuttle system as an action alternative.

¹ The estimated travel time for alternatives 2-4 is approximately 16 minutes, not including wait. DEIS/R at 1-1. This is contrasted with the current shuttle travel time of approximately 15 minutes. *Id.*

² In contrast, project construction is estimated to contribute an additional 568 metric tons of carbon dioxide equivalents. Operation and maintenance of the gondola and the Gazex exploders is estimated to contribute 755 metric tons. DEIS/R at 4.11-11. The estimates are the same for all action alternatives.

0097-4

B. The DEIS/R fails to provide information that supports that there is adequate need for the project as proposed.

Lift tickets purchased at one resort—either Alpine Meadow or Squaw Valley— may be utilized at the other, and they include use of the existing inter-resort shuttle. (DEIS/R at 4.7-14.) The DEIS/R states that after review of ticket scans from the 2015-26 ski season, only one percent of skiers utilized their passes to ski at both Alpine Meadows and Squaw Valley. (*Id.*) With so few guests utilizing their passes to visit both resorts, the proponent fails to establish that there is a need for the project that would support the construction of a gondola that can transport up to 1,400 people per hour between the two resort areas.

The DEIS/R relies on survey responses collected from about 700 hundred resort guests who were asked “How likely would you be to use the gondola to ski both mountains in a single day?” (DEIS/R at 4.7-22.) Among those surveyed, forty-three percent answered that they would use the gondola either “all of the time” or “most of the time.” However, thirty-three percent answered that they would use the gondola only “sometimes,” and twenty-three answered saying “infrequently” or “never.” (*Id.*) Therefore, over fifty percent of respondents indicated infrequent use of the gondola at best. Based on those responses, the DEIS/R concludes that “sizeable shifts of existing skier vehicle trips from one resort to the other in response to the gondola’s presence are not expected.” (*Id.*) This contradicts one of the provided objectives of the project, which is to “[r]educ[e] visitor and resort shuttle system travel on roadways between the resorts.” (DEIS/R at ES-2.) Therefore, the project and its alternatives should be reconsidered because the project conflicts with the proponent’s objectives and is not supported by sufficient need.

0097-5

C. All action alternatives result in significant unavoidable adverse impacts to the traffic around and between Alpine Meadow and Squaw Valley.

The DEIS/R concludes that the project will result in a net increase in vehicle travel to the area, that this increase will result in an significant unavoidable adverse impact to the region, and that no mitigating factors are able to reduce this impact. (DEIS/R at 5-10–13.) In contrast to that result, the DEIS/R states that a project objective is to reduce the visitor travel on the roadways between the resort. (DEIS/R at ES-2.) The DEIS/R reports that the project will result in an increase of around 12,400 skier visits after the first year of opening. (DEIS/R at 4.7-18.) The cumulative effect of increased skier visits to the resorts under all action alternatives will significantly and unavoidably impact the highways and intersections surrounding the resorts. (DEIS/R at 5-10–13.) The cumulative effect of the project on the local infrastructure and roadways should be considered when evaluating the project because the impact remains significant and unavoidable.

0097-6

D. The DEIS/R does not provide a finite project description as required under CEQA.

“Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the “no project” alternative) and weigh other alternatives in the balance.” (Cty. of Inyo v. City of Los Angeles, 71 Cal.App.3d 185, 193 (1977).) The DEIS/R states that the project will cease operation during the

0097-4, Purpose and Need (P&N)

The comment describes the existing infrequent usage of the shuttle system between Squaw Valley and Alpine Meadows. This infrequent shuttle usage supports the need for the project. As described in the Draft EIS/EIR, there is a need for improved connectivity between Alpine Meadows and Squaw Valley based on many factors: the developed snow sports trail network at Squaw Valley has limited terrain suitable for beginners and teaching, whereas Alpine Meadows has additional intermediate and beginner terrain; Squaw Valley has more resort amenities than Alpine Meadows; etc (please refer to pages 1-3 through 1-4 of the Draft EIS/EIR for further detail). In addition, the CEQA project objectives include, in part: enhance the visitor experience at Squaw Valley and Alpine Meadows by providing easy, and potentially faster, interresort access to terrain and amenities at both ski areas; reduce visitor and resort shuttle system travel on roadways between the resorts; and provide opportunities for skiers to offload at mid-stations to provide easier access to existing skiable terrain (page 1-4 of the Draft EIS/EIR).

Appendix C to the Draft EIS/EIR is the Squaw Valley | Alpine Meadows Base-to-Base Gondola Final Visitation and Use Assessment. Appendix C evaluates the anticipated changes to annual snowsports visitation at Squaw Valley and Alpine Meadows as a result of the proposed project. Page 5 of Appendix C explains that the “particularly low shuttle usage is an indicator that guests do not presently find it convenient and/or effective to shuttle between the two resorts (RRC Associates and SE Group 2018).” This statement is supported by other patterns observed throughout the ski industry; for example, as described on page 2-30 of the Draft

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EIS/EIR, "guests do not perceive time spent riding a shuttle bus to be part of their recreation experience, where, time spent on a lift, even if the lift is simply a transit conveyance, is perceived to be part of their skiing day."

The comment also states that the determination in the EIS/EIR that "sizeable shifts of existing skier vehicle trips from one resort to the other in response to the gondola's presence are not expected," contradicts the project objective to reduce visitor and resort shuttle system travel on roadways and between the resorts. The Draft EIS/EIR explains, however, that some shifts are expected because 43% of survey respondents indicated they would use the gondola most of the time or all of the time, and 33% of survey respondents stated they would sometimes use the gondola (Draft EIS/EIR at page 4.7-22).

0097-5, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment restates many of the conclusions from the Draft EIS/EIR and concludes that the cumulative effect on the project on the roadway system should be considered when evaluating the project because the impact remains significant and unavoidable. The cumulative effects of the project on the roadway system is evaluated in Section 4.7.4, "Cumulative Effects." The objective cited in the comment, in full reads; "2. Reduced visitor and resort shuttle system travel on roadways between the resorts." The objective is not to reduce visitor travel overall, but to reduced vehicle trips on the roadway system between the two resorts. Adding vehicle trips from other locations to Squaw Valley and Alpine Meadows would not conflict with this objective. The

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comment does not raise any technical issues regarding the adequacy of the environmental review. Therefore, no further response is required.

0097-6, Project Description (PD)

Proposed operation and long-term maintenance of the gondola is described on pages 2-13 and 2-14 of the Draft EIS/EIR. The EIS/EIR states: "For the purposes of this project, the winter/ski season is defined as the period when both Squaw Valley and Alpine Meadows are in operation for winter sports (based on past operations, Alpine Meadows, on average, closes on approximately April 16). The gondola connection between Alpine Meadows and Squaw Valley would not be operational beyond this date unless both resorts are open for the skiing and snowboarding public" (2-13). Therefore, the summer season is defined as those dates outside of the winter/ski season, when the gondola would not be operational.

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“summer months” with the exception of necessary or routine maintenance. (DEIS/R at 2-14.) However, the DEIS/R fails to state what includes “summer months.” The project description fails to provide concrete dates or measurable natural indicators that proponent will use to determine the closure of the gondola for the summer months. Without knowledge of the actual dates of operation of the project or the method by which the proponent will determine the appropriate time frame for operation, the public and other decision makers cannot adequately balance the purpose and objectives of the project against the environmental impact and the effectiveness of the RPMs. The DEIS/R should be revised to include the concrete or expected dates of operation of the gondola in the project description so that the environmental impact can be accurately measured and considered, as required by CEQA.

0097-7

II. The DEIS/R Fails to Adequately Consider the Impact of the Project on the Nearby Granite Chief Wilderness

The GCW consists of approximately 25,000 acres of designated wilderness area within the Tahoe National Forest. Originally designated in 1984, Congress expanded the GCW in 2007. (California Wilderness Act of 1984, Pub. L. 98-425, 98 Stat. 1619 (1984); California Wild Heritage Act of 2007 (110 H.R. 860).)

The GCW is a part of the National Wilderness Preservation System and is subject to management under the Wilderness Act of 1964. (16 U.S.C. §§1131, 1136.) The Wilderness Act provides that the area be “administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character.” (16 U.S.C. 1131 (a).) The GCW is managed in accordance with the principles of the Wilderness Act by the Tahoe National Forest (“TNF”) and the U.S. Forest Service (“FS”).

The GCW was designated for its “pristine nature, natural beauty, and primitive, non-motorized recreational opportunities.” (Granite Chief Wilderness, U.S. Dept. of Ag., <https://www.fs.usda.gov/recarea/lbmu/recarea/?recid=11819>.) While none of the action alternatives traverse the federally designated GCW directly, they all infringe upon the pristine nature of the GCW. All of the action alternatives impose manmade characteristics upon the wilderness area, both through the visual impairment caused by the addition of the gondola and through the expected increase in flow of visitors and recreation within the wilderness area.

Under proponent’s proposed action (alternative 2), the Alpine Meadows mid-station and the project route border the federally designated GCW. (DEIS/R at 4.2-47.) Alternatives 3 and 4 do not border the GCW directly; however they disrupt the quiet and pristine nature of the wilderness area, visually impair the scenic views, and provide for easier access to the GCW through the location of their respective mid-stations.

0097-8

A. The RPMs described in the DEIS/R fail to mitigate the visual impairment of the project to the GCW

The DEIS/R analyzes the visual character of the region to determine whether or not the project will impair the scenic views. The DEIS/R explains that the visual character “considers visual impacts on scenic vistas and scenic roads, along with general changes to visual quality

0097-6 cont'd, Project Description (PD)

0097-7, Wilderness (W2)

The comment provides a summary of the commenter's understanding of the designation of the Granite Chief Wilderness (GCW), and the potential impacts of the proposed project on the GCW. Section 4.3, "Wilderness," of the EIS/EIR provides in-depth analysis related to the impacts that the action alternatives would have on the National Forest System-GCW. Impact 4.3-3 (all alternatives) includes detailed discussion of impacts that would occur to the natural wilderness quality as a result of potential impacts to the ecological systems of the National Forest System-GCW.

Similarly, Impact 4.3-4 (all alternatives) includes detailed discussion of impacts that would occur as a result of visibility of additional infrastructure, as well as the increased likelihood of visitor encounters resulting from improved access to the National Forest System-GCW. It is important to note that Resource Protection Measure (RPM) REC-4, which is required with project implementation, would reduce potential impacts to the National Forest System-GCW. RPM REC-4 states that "Signage will be posted at both the Squaw Valley and Alpine Meadows base terminals and mid-stations stating that walking or hiking trail access directly from the gondola (i.e., by exiting at a mid-station) is strictly prohibited. The applicant will not permit foot traffic to exit at the Squaw Valley mid-station, or the Alpine Meadows mid-station under Alternative 2."

The comment does not identify specific errors in the Draft EIS/EIR and therefore further response cannot be provided.

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0097-8, Visual Resources (VR)

The comment states that the EIS/EIR should include additional viewpoints within the GCW "so that the full extent of the visual impairment to the wilderness area can be considered." Substantial evidence supports the visual impacts analysis. The commenter's disagreement with the conclusions of the EIS/EIR, and desire for inclusion of additional viewpoints in the EIS/EIR, does not establish that the analysis which led to the conclusions in Section 4.2, "Visual Resources," was deficient.

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives from a selection (16) of representative locations, which were selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. They are also visible to a greater number of people traveling along the roads to or from the base terminal. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative.

Visual simulations are designed to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be, or were required to be, simulated for the purposes of the

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EIS/EIR. Instead, highly frequent or prominent public areas, and visually sensitive vistas, were selected for simulation. For additional information, please refer to Visual Resources Analysis Methods discussed in Section 4.2.2 of the EIS/EIR.

In addition to the analysis of impacts to visual resources in Section 4.2, Section 4.3, "Wilderness," includes analysis specific to the Granite Chief Wilderness. Impact 4.3-4 in that section discusses the potential experiential effects of the project on the National Forest System-GCW, including those that would occur as a result of visibility of gondola infrastructure (cabins, towers, wire-rope) from within the National Forest System-GCW. More specifically, the EIS/EIR concludes that with respect to opportunities for solitude or primitive and unconfined recreation, adverse effects would occur under Alternative 2, and minorly adverse effects would occur under Alternatives 3 and 4.

Furthermore, Section 4.2, "Visual Resources," identifies RPMs that would reduce the identified significant impacts to the extent feasible. In particular, RPMs SCE-1 through SCE-8, REV-1 and REV-3 would reduce the magnitude of Impacts 4.2-2 and 4.2-3 for all alternatives.

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caused by development.” (DEIS/R at 4.2-19.) The DEIS/R includes viewshed and viewpoint analyses of several key scenic views throughout the Tahoe National Forest (TNF), Lake Tahoe, and the GCW. (DEIS/R at 4.2-3.) All action alternatives permanently disrupt the scenic offerings that the GCW is famous for and result in the addition of permanent manmade structures upon the landscape. The DEIS/R indicates that the region is known for its scenic views and that it is highly sensitive to visual impairment. However, the DEIS/R concludes that each of the alternatives results in significant unavoidable adverse disruptions to the “visual character” of the area. (*Id.*) Furthermore, no RPMs reduce the disturbance to less than significant. (DEIS/R at 4.2-30, 4.2-37, 4.2-44.)

The DEIS/R identified and analyzed sixteen viewpoints to determine the visual impairment of the region by each of the four alternatives. (DEIS/R at 4.2-3.) Due to seasonal differences, the original sixteen views resulted in twenty-one distinct views for analysis. (*Id.*) However, only one of those viewpoints identified and analyzed is located within the GCW. The DEIS/R is inadequate because it does not accurately reflect the impairment of the action alternatives to the GCW. The DEIS/R should be revised to include additional viewpoints within the GCW so that the full extent of the visual impairment to the wilderness area can be considered.

Under the proposed action alternative, alternative 2, twenty of the twenty-one views analyzed would result in visible infrastructure. Results from the viewshed analysis show under this alternative the project may be visible from approximately 17.99 square miles within the surrounding area. (DEIS/R at 4.2-30, DEIS/R at 4.2-15.) Alternative 3 has slightly less of an impact, with visible infrastructure in fifteen of the twenty-one views and approximately 16.04 square miles visible within the surrounding area. (DEIS/R at 4.2-36, DEIS/R at 4.2-44.) Alternative 4 results in the same number of viewpoint disruptions as alternative 3; however, alternative 4 results in increased viewshed visibility, with approximately 19.05 square miles visible, and it is the only alternative that results in views of the project from Lake Tahoe. (DEIS/R at 4.2-15–17, DEIS/R at 4.2-42.) The DEIS/R fails to adequately mitigate the visual impairment of the proposed project to the GCW. In each of the three action alternatives, the DEIS/R indicates that the impairment to the region is significant and unavoidable under CEQA and adverse under NEPA. (DEIS/R at 4.2-47.) The DEIS/R violates CEQA because all action alternatives negatively impact the pristine natural views and result in unavoidable significant adverse impacts. The proposed project fails to “indicate the manner in which [the identified] significant effects can be mitigated or avoided.” (Cal. Pub. Res. Code §21002.1(a) (2018).)

B. The RPMs fail to adequately mitigate for the impact of the project’s construction and operational noise on the GCW

Construction of the project will require transportation of materials and personnel by helicopter. To minimize the disruption that the noise of the flight will have on the GCW and nearby residential areas, the DEIS/R includes RPM NOI-3. NOI-3 states that “[h]elicopter flight patterns will be designed to avoid and minimize flights over residential areas and the Granite Chief Wilderness Area to the extent practical.” (DEIS/R at B-9.) However, “to the extent practical” is vague and unenforceable as a mitigation measure.

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0097-8 cont'd, Visual Resources (VR)

0097-8 cont'd, Noise (N)

The comment states that RPM NOI-3 is a vague and unenforceable mitigation measure. NOI-3 is an RPM, and is therefore part of the project and was included in the pre-analysis phase of the EIS/EIR. Exact helicopter flight paths cannot be known until project design and construction details are finalized. Due to the uncertainty regarding the specific locations and daily operations of helicopters, the Draft EIS/EIR determined that helicopter use could result in substantial noise levels. Disallowing the use of helicopters is not feasible because helicopters are necessary to construct the project. Because there is no other feasible mitigation, and to be conservative, the EIS/EIR identified the potential temporary construction noise from helicopters as a significant and unavoidable impact. However, RPM NOI-3 has been updated to further clarification implementation of the measure. RPM NOI-3 now reads:

"Helicopter flight patterns will be designed to avoid and minimize flights over residential areas, the National Forest system -Granite Chief Wilderness Area, and the Five Lakes Trail to the extent practical. For Alternatives 3 and 4, helicopter flights over the National Forest System - Granite Chief Wilderness will be prohibited. Prior to Placer County issuance of building permits and Forest Service Operating Plan approval, the applicant shall submit maps to both agencies, for review and approval, indicating zones where helicopter flights would occur during construction."

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Mitigation measures must be “enforceable through permit conditions, agreements, or other measures” (Federation of Hillside & Canyon Ass’ns v. City of Los Angeles, 83 Cal.App.4th 1252, 1261(2000).) RPM NOI-3 provides no enforceable guarantee that the flight patterns will not traverse the GCW and disrupt the wilderness area. Wilderness areas are managed to preserve their natural condition and opportunities for solitude. (16 U.S.C. §1131(b).) The use of mechanical transports within wilderness areas is prohibited “except as necessary to meet minimum requirements for the administration of the area for the purpose of th[e] [Wilderness] Act.” (*Id.* at §1133(c).) “Helicopters carry ‘man and his works’ and so are antithetical to a wilderness experience.” (Wolf Recovery Found. v. United States Forest Service, 692 F.Supp. 2d 1264, 1268 (Idaho D. C. 2010).) The circumstances where “machinery as intrusive as a helicopter” could satisfy the Wilderness Act’s exception to mechanical transport is rare. (*Id.*) Therefore, RPM NOI-3 does not adequately mitigate the impact of helicopter flight patterns on the GCW as required by CEQA. Because the use of mechanical transport is antithetical to the wilderness experience, RPM NOI-3 should be revised to provide that helicopter flight patterns under RPM NOI-3 are “fully enforceable through permit conditions, agreements, or other measures.” (Cal. Pub. Res. Code §21081.6(b).)

0097-9

C. The DEIS/R fails to adequately address the impact of increased accessibility to the GCW due to the addition of two mid-stations that allows passengers to off-load in closer proximity to the GCW

The TNF limits visitor pack size in the GCW to no more than 12 people and operates under the principles of “leave no trace.” (Granite Chief Wilderness, Lake Tahoe Basin Mgmt. Unit, <https://www.fs.usda.gov/recarea/lbmu/recarea/?recid=11819>.) According to the DEIS/R, under the action alternatives, the base stations for all three routes range from 75 feet to approximately 2,000 feet from federal lands designated as the GCW. (DEIS/R at 2-4, 4.3-12.) Project estimates state that, at capacity, the project would transport 1,400 passengers every hour and each cabin would carry eight passengers. The construction of the various mid-stations, consistent with the objective of the project to “[p]rovide opportunities for skiers to offload at mid-stations to provide easier access to existing skiable terrain,” would allow passengers to exit the gondola and access the areas in between. (DEIS/R at 1-4.) Therefore, the project would create an opportunity for those seeking to hike or recreate in GCW to use the gondola to enter through one of its mid-stations.

The DEIS/R does not adequately address the proponent’s plan to control the flow of passengers from the mid-stations into the wilderness area and does not adequately address how the increase in accessibility to the GCW will ensure that the wilderness area retains its “primeval character and influence, without permanent improvements or human habitation” and is “protected and managed so as to preserve its natural conditions.” (16 U.S.C. §1331(c).) Although proponent submits that the project will not operate during the summer, it is likely that the gondola will operate when there is inconsistent ground cover and will result in increased activity in the GCW and within SNYLF critical habitat. (DEIS/R at 4.3-12.) The expected increase in activity would occur under all action alternatives; however it is most adverse in alternative 2. As noted in the Biological Assessment (“BA”), evidence of human use within the area and nearby is already evident in the form of trash left behind. (SNYLF BA at 75–76.) The increase in visitors to the GCW will reduce the opportunities for solitude and primitive unconfined recreation and it threatens the integrity of the wilderness if visitors do not respect the visitation guidelines.

0097-8 cont'd, Noise (N)

0097-9, Wilderness (W2)

The comment states that the EIS/EIR “does not adequately address the proponent’s plan to control the flow of passengers from the mid-stations into the wilderness area and does not adequately address” the increase in accessibility to the National Forest System-GCW. Section 4.3 of the EIS/EIR, “Wilderness,” analyzes the potential for the gondola mid-stations to improve access to the National Forest System-GCW. The EIS/EIR recognizes that the mid-stations would improve access, and acknowledges that during transitional seasons and periods of inconsistent snow cover, the gondola could be open for use while the southern aspect slopes would be dry enough for hikers to use the National Forest System-GCW for day-trips or backpacking. Thus, the EIS/EIR states that this improved access could increase the likelihood of visitor encounters within the National Forest System-GCW, thereby reducing opportunities for solitude and primitive and unconfined recreation (page 4.3 -12 of the Draft EIS/EIR). The increase in visitation during these limited time frames cannot be precisely measured.

RPMs have been included with the proposed project to minimize these potential impacts. In particular, RPM REC-4 requires that “Signage will be posted at both the Squaw Valley and Alpine Meadows base terminals and mid-stations stating that walking or hiking trail access directly from the gondola (i.e., by exiting at a mid-station) is strictly prohibited.” Implementation of this RPM would minimize the increased likelihood of visitor encounters as the applicant will not permit foot traffic to exit at the

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Squaw Valley mid-station, or the Alpine Meadows mid-station, under Alternative 2.

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(DEIS/R at 4.3-18.) This disrupts the GCW and frustrates the purpose of the congressionally designated wilderness area. Because the project threatens the opportunities for solitude and the primitive and unconfined recreation on the GCW, the project and project alternatives should be reconsidered to include additional measures to mitigate or avoid the detrimental impact to the wilderness area caused by increased human activity on the natural landscape. This may include closing all mid-stations to entry/exit. This option would allow for the gondola to connect the two ski areas, in accordance with the project's purpose, but would reduce the detrimental impact of increased visitation to the wilderness. (DEIS/R at ES-2.)

0097-10

III. The DEIS/R Fails to Adequately Address and Mitigate the Impacts of the Project on the Endangered Sierra Nevada Yellow Legged Frog

The Sierra Nevada Yellow Legged Frog ("SNYLF") was designated as an endangered species under the Endangered Species Act ("ESA") in 2014. (79 Fed. Reg. at 24,256 to be codified at 50 CFR pt. 17.11.) The U.S. Fish & Wildlife Service determined that the SNYLF was in danger of extinction based on "the immediacy, severity, and scope of the threats to their continued existence." (79 Fed. Reg. at 24,256.) In accordance with the ESA, the Service also designated critical habitat for the SNYLF. (81 Fed. Reg. 59,046.) Of the designated critical habitat, subunit 2D, known as Five Lakes, consists of approximately 9,000 acres. (*Id.*) All three action alternatives have project areas that are located within the SNYLF's designated critical habitat. (DEIS/R at 4.14-14, 81 Fed. Reg. at 59,071.)

In the three actions analyzed by the DEIS/R, all proposed action alternatives will significantly impact the SNYLF and its critical habitat. (DEIS/R at 2-32-36.) The DEIS/R indicates that the proposed action alternative (alternative 2) will have thirty-eight adverse impacts under NEPA, and alternative 3 and 4 both resulted in a finding of thirty-four adverse impacts (*Id.*) Furthermore, under CEQA, all three action alternatives resulted in the same six consequences that are considered "significant and unavoidable," despite the implementation of RPMs. (*Id.*)

Despite the DEIS/R's claim that the mitigating measures required by CEQA will reduce this impact to less than significant (DEIS/R at 4.14-105-107), it fails to mention the impact of the measures on the recovery of the species and how the project may result in habitat fragmentation, an identified threat to the SNLYF. (Brown et al., Mountain Yellow Legged Frog Conservation Assessment 41-43 (July 2014).)

0097-11

A. The DEIS/R fails to adequately mitigate the impact of the project to the critical habitat of the SNYLF

The goal of the Endangered Species Act ("ESA") is to promote the conservation and the recovery of listed species. The SNYLF was listed as endangered in 2014 (79 Fed. Reg. 24,255 (2014).), and critical habitat was subsequently designated in 2016. (81 Fed. Reg. 59,046 (2016).) The ESA defines occupied critical habitat as "specific areas . . . on which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection." (16 U.S.C §1532(5)(A).) In designating subunit 2d (Five Lakes) the Service noted that "[t]he physical or biological features essential to the conservation of the Sierra Nevada yellow-legged frog in the Five Lakes subunit

0097-9 cont'd, Wilderness (W2)

0097-10, Wildlife and Aquatics (W&A)

The comment's statements are consistent with the conclusions of the Draft EIS/EIR. The comment begins and ends specifically addressing Sierra Nevada yellow-legged frog (SNYLF), but provides a general summary of overall project effects for all environmental issue areas, repeating information provided in the Draft EIS/EIR. Section 4.14, "Wildlife and Aquatics," particularly Impacts 4.14-1 and 4.14-2 (Alt. 2, Alt. 3, and Alt 4), analyze potential impacts to SNYLF and its critical habitat. As described in Section 2.2.6, "Resource Protection Measures," the project incorporates a number of Resource Protection Measures (RPMs) designed to avoid and minimize environmental effects. These RPMs are considered part of the project by the Forest Service and will be conditions of approval of the Placer County Conditional Use Permit. The text of all RPMs is provided in Appendix B. The potential effects of implementing the action alternatives are analyzed as follows: The effect of the action alternatives was determined, relevant RPMs were applied, and the effectiveness of reducing adverse effects was determined. If additional measures were needed to further reduce effects, they were identified. The RPMs and Mitigation Measure 4.14-1 (Alt. 2, Alt. 3, and Alt.4) in the Draft EIS/EIR would reduce or eliminate potential effects on the SNYLF or its habitat.

As it relates to CEQA, the significance of impacts is determined before RPMs are implemented. The analysis then determines whether the RPMs would reduce significant impacts to a less-than-significant level. If significant impacts would remain, mitigation

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measures are added, as feasible, to further reduce the significant impact. All RPMs, as well as additional mitigation measures, would be included in the Placer County mitigation monitoring and reporting program (MMRP), and their implementation would be ensured by the conditional use permit's conditions of approval. All RPMs are considered roughly proportional and have an essential nexus to the impacts they reduce.

The proposed project would not result in habitat fragmentation for SNYLF because the nature of the project (periodic towers or structures with overhead cables between the structures) would not adversely affect potential movement of SNYLF (if frogs were to attempt to cross the alignment of any of the action alternatives). This issue is specifically addressed in the discussion of Impact 4.14-6: Disturbance or Loss of Wildlife Movement, Wildlife Corridors, and Native Wildlife Nursery Sites. This impact is evaluated for every alternative.

The Draft EIS/EIR includes impact determinations consistent with the requirements of the Endangered Species Act (ESA) of 1973, as amended, as well as requirements of NEPA and CEQA. For example, including the consideration of RPMs, but prior to the consideration of mitigation measures, Impact 4.14-1 (Alt. 2): Direct and Indirect Effects on Sierra Nevada Yellow-Legged Frog, includes the ESA determination of "may effect, and is likely to adversely affect" SNYLF. However, the final determination will be based on completion of ESA consultation with USFWS, as required by law and referenced in Mitigation Measure 4.14-1 (Alt. 2). Completion of ESA authorization for any of the action alternatives, including compensatory mitigation as referenced in Mitigation Measure 4.14-1, would ensure that the action alternatives would

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not result in significant adverse effects on the SNYLF, as well as not substantially degrade the potential for recovery of the species. The Final EIS/EIR will address Section 7 consultation with the U.S. Fish and Wildlife Service in accordance with the Endangered Species Act (ESA) of 1973, as amended.

0097-11, Wildlife and Aquatics (W&A)

The comment states that the Draft EIR/EIS fails to adequately mitigate for the impacts of the project to the SNYLF critical habitat, and provides a summary of Federal regulations that provide protection to SNYLF and its designated critical habitat. The comment also notes that the addition of the project through SNYLF critical habitat will be detrimental to the species because it will result in permanent increased recreation in the critical habitat, as well as temporary disturbances related to project construction. Furthermore, the comment states that the RPMs provided in the Draft EIR/EIS do not mitigate, or even mention the destruction of the SNYLF critical habitat.

Section 4.14, "Wildlife and Aquatics," and particularly the discussion of Impacts 4.14-1 and 4.14-2 (Alt. 2, Alt. 3, and Alt 4), analyze potential impacts to SNYLF and its critical habitat. The analysis shows that winter-time recreation (when the frogs are dormant in over-wintering ponds) will not be detrimental to SNYLF. Potential impacts to the frog, occupied habitat or critical habitat differ for all three alternatives as analyzed in Section 4.14, "Wildlife and Aquatics," particularly Impacts 4.14-1 and 4.14-2 (Alt. 2, Alt. 3, and Alt 4). As set forth in

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the Draft EIS/EIR, the proposed project and action alternatives would have direct and indirect effects on SNYLF critical habitat. The project incorporates multiple RPMs to lessen these impacts, to the extent feasible, as required by the Forest Service and County policy. For those impacts that cannot feasibly be avoided, mitigation is recommended that would require compensatory habitat. For this reason, the project would not result in a net reduction of SNYLF critical habitat.

The comment does not distinguish between critical habitat and occupied habitat. Not all aquatic or upland habitat found within the critical habitat designation is suitable habitat for SNYLF. As such, the likelihood of finding an adult or juvenile frog in unsuitable habitat such as the granite shelf, which supports limited vegetation and limited permanent water sources, is extremely low. This concept is supported by the fact that the Critical Habitat Area that encompasses the project site, as shown in Exhibit 4.14-2 of the Draft EIS/EIR, also includes parking lots, homes, and other development associated with Squaw Valley and Alpine Meadows. The USFWS mapping of a critical habitat area should be interpreted as a broad brush identification of where critical habitat, with all necessary habitat elements, may be found, but should not be interpreted as specifically identifying habitat critical to the SNYLF.

The comment states that RPM MUL-4 should apply to all action alternatives, and not only Alternative 2. RPM MUL-4 only applies to Alternative 2 because the Alpine Meadow mid-station would be located adjacent to Barstool Lake, and field surveys conducted for the project identified SNYLF occupancy within this lake. In regards to the seasonal variation in snowpack melt, and for the

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overall increase in average temperature and decrease in snowpack that is expected from climate change, the Gondola would be operational only if both resorts are open, as described in Chapter 2, "Description of Alternatives." In other words, the resorts and the gondola would only be open when snow is present. Any decreases in snowpack resulting from climate change would also shorten the period of gondola operation as both items are directly correlated.

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0097-11 cont'd, Wildlife and Aquatics (W&A)

may require special management considerations or protection due to the presence of introduced fishes, timber management and fuels reduction, and recreational activities.” (81 Fed. Reg. at 59,075–76.) Thus, the addition of the project through SNYLF critical habitat will be detrimental to the species because it will result in permanent increased recreation in the critical habitat, as discussed above, as well as temporary disturbances related to project construction.

All project alternatives result in permanent and temporary disruptions to the SNYLF’s known occupied critical habitat. (SNYLF BA at 61–63.) According to the biological assessment, 98.16% of the project area for alternative 2 is located within designated critical habitat. 93.34% of the project area for alternative 3 and 75.28% of the project area for alternative 4 are located within designated critical habitat (*Id.*) Further, the RPMs provided for in the DEIS/R do not mitigate, or even mention the destruction of the SNYLF’s critical habitat. (DEIS/R at Appendix B.)

Under CEQA, public agencies should not approve projects if there are “feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Cal. Pub. Res. Code §21002.) Over ninety percent of the proposed routes for alternatives 2 and 3 overlap with designated critical habitat for the SNYLF. The route for alternative 4 also overlaps SNYLF critical habitat, however it overlaps slightly less, at only seventy-five percent. (SNYLF BA at 61–63.) Because the projects allow for off-loading at the respective mid-stations, the project will lead to an increase in recreation in areas identified by the Service to be occupied by the SNYLF and protected by critical habitat designation. The proximity of the mid-stations to occupied critical habitat will allow for increased recreational activities within the critical habitat, which is an identified threat to the SNYLF.

While the Center opposes construction of the project in SNYLF critical habitat, at a minimum the DEIS/R should be revised and recirculated to include mitigation measures that would lessen the impact of the added recreation and human intrusion into the SNYLF critical habitat. RPM MUL-4 states that under alternative 2, “the Alpine Meadows mid-station may be open to skier entry/exit through April 15th only, to minimize the potential for adverse effects on Sierra Nevada yellow-legged frog at Barstool Lake.” (DEIS/R at B-4, *see also* DEIS/R at 2-13–14.) However, RPM MUL-4 is insufficient to protect the critical habitat and work towards recovery of the SNYLF.³ Alternatives 3 and 4 would remain open until the gondola ceased seasonal operation for the “summer months”. (*Id.*) All mid-stations should be closed to entry/exit because they provide for increased recreational access to SNYLF critical habitat under all action alternatives. The DEIS/R is inadequate under CEQA because there are feasible mitigation measures available that will substantially lessen the impact of the project on the SNYLF and on SNYLF critical habitat. (Cal. Code Regs. tit. 14 §15126.4 (2018).) To adequately mitigate the impact of the project on the SNYLF and the SNYLF’s critical habitat, the mid-stations should not be open to exit/entry.

³ The DEIS/R states that April 15 was selected because it is “around which time the frog is known to awaken from hibernation.” DEIS/R at 2-14. The justification for this date does not account for seasonal variations in snowpack melt, and for the overall increase in average temperature and decrease in snowpack that is expected from climate change. DEIS/R at 4.11-12.

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0097-12

B. The DEIS/R relied on insufficient information when it concluded that the installation of the Gazex Avalanche control measures will not significantly impact the SNYLF

The location of the Gazex system for all three action alternatives is the same. (DEIS/R at 4.14-87). Therefore, the impact on the SNYLF of the installation and the use of the avalanche control system would result in the same environmental disturbances and would require implementation of the same RPMs under each action alternative. The DEIS/R admits that “[t]here are currently no studies that have looked at the effects of avalanche control or shelling explosions on overwintering amphibians or tadpoles, and . . . sound and vibration may reach Barstool Lake (approximately 350 feet) and the overwintering SNYLF tadpoles and adults.” (*Id.* at 4.14-49). However, the DEIS/R later states that the impact under CEQA, with the implementation of mitigating measures, would be reduced to a less-than-significant level. (*Id.* at 4.14-54.)

Certain RPMs that would be enforced under CEQA may reduce some of the identified environmental impacts of the project to the endangered SNYLF, however the DEIS/R erroneously concludes that the RPMs would reduce the impact to less than significant. As the DEIS/R states, there are no studies that provide the effects of the avalanche control system on overwintering amphibians and tadpoles. Meanwhile, the proposed location of five Gazex exploders would be located near Barstool Lake, which is known occupied habitat for the SNYLF, and is also included in the SNYLF’s designated critical habitat. (DEIS/R at 2-4, SNYLF BA at 62.) Consequently, there is inadequate information for the DEIS/R to conclude that the implementation of RPMs would mitigate the impact of the project to the SNYLF “the point where it is believed no take would occur.” (DEIS/R at 5-4-5.) The DEIS/R should not conclude that “potential impacts to this species would be mitigated to the point where it is believed no take would occur,” and that “the action alternatives would comply with the ESA” without adequate support and knowledge of a baseline impact of avalanche control systems on overwintering amphibians and tadpoles. The DEIS/R should be revised to reflect this uncertainty regarding the impact of the avalanche control measures on overwintering amphibians and tadpoles.

0097-13

C. The DEIS/R errs in concluding that the implementation of all RPMs will result in no take of the SNYLF

The DEIS/R states that with the implementation of the relevant RPMs, “potential impacts to this species would be mitigated to the point where it is believed no take would occur, and because no other threatened or endangered species were found within the project area, the action alternatives would comply with the ESA.” (DEIS/R at 5-5.) However, the relevant RPMs for the SNYLF do not provide certainty that no take would occur.

The ESA defines take as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” (16 U.S.C. §1532(19).) Furthermore, “harm” is defined under the ESA to include “an act which actually kills or injures wildlife. Such act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.” (50 C.F.R. 17.3.) And harass is defined under the ESA to mean “an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such

0097-12, Wildlife and Aquatics (W&A)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, “Master Responses,” for more information on the removal of Gazex from the project.

0097-13, Wildlife and Aquatics (W&A)

The comment states that the Draft EIS/EIR incorrectly concludes that no take of SNYLF would occur. The Draft EIS/EIR explains that the project may result in incidental take of SNYLF, but with implementation of both the RPMs and mitigation measures, the project would minimize impacts on and prevent take of SNYLF. (Draft EIS/EIR, Impacts 4.14-1 and 4.14-2.)

The comment states that RPM BIO-18 defers completion of field surveys. Field surveys, as required by the Forest Service and USFWS, were conducted prior to preparation of the EIS/EIR. As described in Sections 4.12 through 4.15 of the EIS/EIR, field surveys of the alternative gondola alignments were conducted in 2015, 2016, and 2017 by Ascent Environmental, EcoSynthesis, and Hydro Restoration (also see Appendix H of the EIS/EIR for survey results). Surveys conducted within the project areas only identified SNYLF occupancy within Barstool Lake. Pre-construction surveys would ensure that the SNYLF has not moved into areas previously surveyed. RPM BIO-19 requires that a Forest Service Biologist, or Forest Service approved biologist (e.g., qualified ecological

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monitor) must be present during construction near riparian areas or aquatic habitat suitable for the SNYLF and adjacent upland habitat. This would help to ensure that construction activities do not cause adverse effects.

The comment is correct that RPMs BIO-18 and BIO-19 focus on potential effects to SNYLF during project construction. However, other measures, such as RPM BIO-3 and Mitigation Measure 4.14-1 address potential effect on SNYLF during other phases of project operation. Also, the potential for noise and other direct and indirect effect mechanisms to adversely affect SNYLF are discussed in Impact 4.14-1, for example, Draft EIS/EIR page 4.14-48, "Construction activities can also have a direct effect on the SNYLF by temporarily displacing the frog from the construction area as they may avoid the surrounding area due to human presence and noise during construction."

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0097-13 cont'd, Wildlife and Aquatics (W&A)

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an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering.” (*Id.*)

The pertinent RPMs (BIO-18 and BIO-19) state that they would prevent any incidental take of SNYLF by “relocate[ing] individuals to suitable habitat outside of the construction area.” (DEIS/R at B-18). However, for those identified RPMs to be successful, the SNYLF must be found and identified. The nature of the SNYLF and its size do not provide certainty that all SNYLFs within the construction area will be identified and relocated. Therefore, there is no certainty that incidental take will not occur. The relevant RPMs in the DEIS/R are inadequate to support the conclusion that no harm/take of the SNYLF will occur. The ESA includes in its definition for “take” both harass and collect. (16 U.S.C. §1532(19).) Moreover, moving or relocating SNYLF that have been identified within the construction *will* result in a take as defined by the ESA because the ESA defines take to include capture. (16 U.S.C. §1532(19).) The RPMs do not address any measures that will be taken to ensure that SNYLF that are relocated as a part of BIO-18 or BIO-19 survive relocation. Additionally, the presence of people and loud machinery within the SNYLF’s critical habitat will also likely disrupt normal behavior patterns, causing take in the form of harassment. (50 C.F.R. 17.3.) Thus, the RPM’s are inadequate to protect the SNYLF from take under the ESA.

RPM BIO-18 defers the completion of field surveys to be “[c]oncurrent with preconstruction surveys.” (DEIS/R at B-18.) The results of the field investigation will be used to “inform compensation ratios and any other required responses to SNYLF habitat loss associated with the project.” (*Id.*) The deferral of mitigation measures to a later time violates CEQA. (See Cal. Code of Regs. tit. 14 § 15126.4, stating that “[f]ormulation of mitigation measures should not be deferred until some future time.”) Under RPM BIO-18, it is unclear how the proponent can base a mitigation measure on the results of a future survey. The postponement of field investigations is an impermissible violation of CEQA and does not provide the public and decision makers with an accurate view of the project as a whole. (*See* Cty of Inyo, 71 Cal.App.3d at 193.) RPM BIO-18 should be revised to rely on known survey results. Alternatively, the field investigation should be conducted prior to the completion of the Final Environmental Impact Statement/Report so that the results can be adequately incorporated into the RPMs and considered in the decisionmaking process.

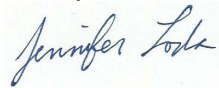
Further, RPM’s BIO-18 and BIO-19, which mitigation impacts to the SNYLF, are only implemented during the construction of the project. (DEIS/R at B-18.) The DEIS/R errs in its conclusion that the implementation of RPMs will result in “no take.” (*Id.* at 5.5) The DEIS/R does not discuss how the ongoing operation of the gondola, the installation and operations of the Gazex exploders, and future maintenance of the gondola may harm the species. The project results in an overall increase in noise to the region due to the ongoing operation of the gondola and the intermittent use of the Gazex exploders. (DEIS/R at Appendix F.) All three action alternatives are located within designated critical habitat for the SNYLF. The DEIS/R does not consider the impact of increased noise to the region to the SNYLF and does not analyze whether increased noise may adversely or significantly impact or harm the behavioral patterns of the SNYLF in its critical habitat. The DEIS/R does not provide sufficient information to support its conclusion that the action alternatives will not harm the SNYLF or adversely modify its critical habitat with the habitat destruction caused by construction, the introduction of increased noise, and the opportunities for increased recreation in the frog’s critical habitat.

0097-14

Conclusion

Thank you for the opportunity to submit comments on this proposed Project. We look forward to working to ensure that the Project and environmental review conforms to requirements of state and federal law to make certain that all significant impacts to the environment are fully analyzed, mitigated, or avoided, and that accurate and current information is relied upon in the decisionmaking process. In light of the significant unavoidable adverse impacts that will result from all action alternatives, we strongly urge you to deny this Project. At a minimum, the DEIS/R must be revised and recirculated to address the deficiencies under CEQA. Please do not hesitate to contact the Center with any questions at the number provided below. We look forward to reviewing the Applicant's responses to these comments in the Final EIS/R for this Project once completed.

Sincerely,



Jennifer L. Loda, Staff Attorney
Holly Ingram, Law Clerk
Center for Biological Diversity
1212 Broadway, Ste 800
Oakland, CA 94612
(510) 844-7100 x336
jloda@biologicaldiversity.orgj

0097-14, Summary (S2)

The comment provides a summary of detailed comments provided above. See responses to the detailed comments above. For the reasons described above, the Draft EIS/EIR does conform to the requirements of NEPA and CEQA, and the Draft EIS/EIR does not require recirculation.

0104

0104-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

*North Fork Association
P.O. Box 1334
Nevada City, CA 95959*

June 11, 2018

Ms. Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development
Resource Agency
3091 County Center Drive, Suite #190
Auburn, California 95603
Email: sherring@placer.ca.gov

Ms. Joanne Roubique, District Ranger
U.S. Forest Service,
Tahoe National Forest,
Truckee Ranger District
c/o NEPA Contractor
P.O. Box 2729
Frisco, CO 80443
Email: Comments@squawalpinegondola-eis.com

Re: Squaw Valley-Alpine Meadows Base-to-Base Gondola Draft Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation

Dear Ms. Herrington and Ms. Roubique:

0104-1

The North Fork Association (NFA) is a private landowner group that owns and manages approximately 5,400 acres of land in the Headwaters Basin of the North Fork American River near Squaw Valley. Our members are greatly concerned about the proposed Squaw Valley-Alpine Meadows Base-to-Base Gondola Project ("Project") and the potentially severe impacts it would cause on the sensitive natural resources that exist in this pristine subalpine and alpine environment which is adjacent to the Granite Chief Wilderness Area.

We respectfully submit these comments to help ensure that agency decision-makers fully comply with the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 *et seq.*, and the National Environmental Policy Act ("NEPA"), 42 U.S.C. section 4321 *et seq.* These impacts could be even more damaging due to the Project's connection to and relationship with development in Squaw Valley and on Troy Caldwell's property ("White Wolf"). After carefully reviewing the Draft Environmental Impact Report/Statement ("DEIR/S") for the Project, we have concluded that it fundamentally fails to comply with the requirements of CEQA and NEPA in numerous respects. As described below, the DEIR/S violates these laws because it: (1) fails to provide an adequate description of the Project; (2) defers analysis of critical environmental impacts and fails to adequately analyze those impacts it does address; (3) fails to support its conclusions with substantial evidence; (4)

0104-1
cont'd

fails to propose adequate mitigation measures for the Project's numerous significant environmental impacts; and (5) fails to undertake a sufficient study of alternatives to the Project.

Overall, our review of this environmental document indicates that it fails to fully and accurately inform decision-makers and the public of the severe environmental consequences of the proposed action and it does not identify ways to mitigate or avoid those impacts, it does not satisfy the basic goals of either CEQA or NEPA. We respectfully request that the Final EIR/S respond separately to each of the points raised in the technical consultant's reports as well as to the points raised in this letter.

0104-2

1. The DEIR/S Fails to Comply with CEQA and NEPA because it does not provide a complete Description of the Project or a means of distinguishing among Project alternatives.

CEQA's most fundamental requirement is that an EIR contain an accurate and complete description of the proposed project. This rule ensures "that environmental considerations do not become submerged by piecemealing large project into many small ones—each with a potential impact on the environment—which cumulatively may have disastrous consequences. Without a complete project description, an agency and the public cannot be assured that all of a project's environmental impacts have been revealed and mitigated. Further, the CEQA and NEPA Guidelines mandate that an DEIR/S include a description of "the physical environmental conditions in the vicinity of the project from both a local, regional, and cumulative perspective." This requirement derives from the principle that without an adequate description of the project's local, regional, and cumulative context, the DEIR/S and thus the decision-makers and the public who rely on this environmental document cannot accurately assess the potentially significant impacts of the proposed Project.

The document further explains that "based on the analysis documented within this EIS/EIR, the Responsible Official, the Forest Supervisor for the TNF, will decide whether to select Alternative 2 (Proposed Action Alternative provided by the applicant), one of the other action alternatives, or the No Action Alternative." The DEIR/S then proceeds to analyze the significant environmental effects of each of these alternatives, which vary significantly depending on the route location. Although Alternative 2, the alternative that was ultimately selected, was evaluated in detail, the other alternatives received only a cursory analysis. The DEIR/S does not give sufficient information about Project alternatives' components and actions to enable an informed evaluation of the Project's environmental impacts. For example, the DEIR/S provides insufficient detail about construction of a "temporary" access road (and indeed, omits discussing of the access road entirely for two of the alternatives, although it appears necessary), tower sites, and associated infrastructure, leaving much to the reader's imagination. The document must be revised to include the requisite detail, which is critical to adequate evaluation and proper mitigation of significant impacts. Finally, the DEIR/S improperly segments review of the gondola proposal from a proposed residential development and ski resort at White Wolf, which is within and/or abuts the area(s) of the Project alternatives. The White Wolf development is inextricably linked with the gondola Project.

2. The DEIR/S's Analysis of and Mitigation for the Project's Environmental

0104-3

0104-1 cont'd, Summary (S2)

0104-2, Project Description (PD)

The comment requests additional detail for Alternatives 3 and 4 regarding "construction of a temporary access road..., tower sites, and associated infrastructure." The additional detail requested by the comment was not provided in Chapter 2 of the Draft EIS/EIR because this component of the project would not differ considerably between action alternatives. The exact alignment of the temporary construction access route under Alternative 2 would differ from Alternatives 3 and 4 (please refer to Exhibits 2-2, 2-9 and 2-13 in the Draft EIS/EIR), but the narrative description of the temporary construction access route provided on page 2-11 is applicable for all action alternatives.

Analysis provided in the Draft EIS/EIR was conducted with equal consideration of all alternatives. In places where specific detail was omitted for Alternatives 3 or 4, this detail was intentionally omitted to minimize redundancy in the Draft EIS/EIR. Much of the description of various project components or environmental analysis would not differ appreciably between action alternatives (e.g., description of the temporary construction access route). For any subjects where environmental impacts would be different across alternatives, distinctions between alternatives were identified in great detail. For example, please refer to Impact 4.2-2 for Alternative 3, beginning on page 4.2-34 of the Draft EIS/EIR; the analysis provided in this section refers to analysis provided earlier in the document for Alternative 2 where appropriate, and provides unique analysis as necessary where

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impacts for Alternative 3 would differ from those associated with Alternative 2.

In response to the comment that the Draft EIS/EIR improperly segmented review of the gondola project from the Caldwell property development (referred to as the "White Wolf Development"), please refer to the response provided for comment 0166-6. The White Wolf Development and the proposed gondola project are not considered part of the same project under either NEPA or CEQA.

0104-3, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0104-3
cont'd**Impacts Are Inadequate.**

As discussed below, the evaluation of a proposed project's environmental impacts is the core purpose of a DEIR/S as it does not discuss fully the Project's potential and likely impacts on biological resources, water quality and hydrology, noise, transportation, air quality, and climate change. It also fails to identify effective mitigation measures for the Project's significant effects.

0104-4

The DEIR/S's analysis of Project-related impacts to biological resources contains numerous deficiencies that must be remedied in order for the public and decision-makers to fully understand the Project's likely impacts. Some of the DEIR/S's most troubling omissions include: (1) an inadequate description of the existing setting; (2) an inadequate description of the Project; (3) an incomplete analysis of impacts; and (4) deficient mitigation measures. Of particular concern are the inadequate discussion of potential projects on the federally-listed Endangered Sierra Nevada yellow-legged frog (*Rana sierrae*), including the direct loss of individuals and occupied habitat. The uncertainty surrounding the Project leads inevitably to deferred analysis and mitigation. Time and again, the DEIR/S states that impacts will be avoided through Resource Protection Measures ("RPM") that call for additional review and analysis down the road.

Merely stating that an impact will occur is insufficient, a DEIR/S must also provide "information about how adverse the adverse impact will be mitigated." The DEIR/S's analysis of impacts to the Sierra Nevada yellow-legged frog and other biological resources fails to fulfill this mandate in several instances, including formal consultation with the U.S. Fish & Wildlife Service.

0104-5

The Project would construct an aerial gondola more than two miles long consisting of 35 towers, some exceeding 50 feet in height, two base terminals, and two 24-foot by 84-foot mid-stations—traversing a pristine granite ridgeline at the crest of the Sierra Nevada. The Project would also install eight Gazex exploders at Alpine Meadows ski resort. The scenic value of this ridgeline is obvious to anybody who has hiked the popular Five Lakes Trail and is almost certainly among the reasons for its inclusion in the 1984 Granite Chief Wilderness designation. Unfortunately, the DEIR/S employs a viewshed analysis that largely ignores the largest components of the Project and fails to adequately analyze or disclose the harm this infrastructure would inflict on this treasured landscape. The DEIR/S employs an inappropriate method to analyze the Project's impacts on viewsheds, as it uses high-resolution topographical mapping data

and geographical information system technology to define the Project viewshed—the "zone of potential visibility" where project components would be within line of sight of potential users. Although a properly conducted viewshed analysis can be a powerful tool for analysis, the DEIR/S applies the technique in a manner that serves to obscure and minimize rather than disclose and highlight the Project's visual impacts. The viewshed analysis is misleading because it focuses entirely on the visibility of

gondola towers within the viewshed, while failing to account for the proposed gondola mid-stations in determining the "zone of potential visibility." Because the DEIR/S's viewpoint analysis forms the basis of its significance determinations concerning visual resources, it is critical that the Forest Service the appropriate analysis to develop its mitigation through selected RPMs. Overall, our analysis of the DEIR/S suggests that the assertions in this document do not support the conclusion that visual impacts could be mitigated to less-than-significant levels since

0104-3 cont'd, Summary (S2)

0104-4, Wildlife and Aquatics (W&A)

The comment states that the Draft EIR/EIS contains numerous deficiencies, including an inadequate description of the existing setting and project description. However, the comment provides no evidence or specifics on how the setting information and project description may be lacking. Section 4.14, "Wildlife and Aquatics," describes the setting in Subsection 4.14.1.1, "Environmental Setting." Chapter 2.0, "Description of Alternatives," of the Draft EIR/EIS provides the project description. Also see responses to comments earlier in this letter related to Project Description.

The comment also states that the Draft EIR/EIS includes an incomplete analysis of impacts and that the mitigation measures are deficient. In particular, the comment expresses concern with the discussion of SNYLF and the associated mitigation. Again, the comment provides no evidence or specific examples to support these assertions.

The Draft EIS/EIR discusses impacts related to SNYLF in Section 4.14, "Wildlife and Aquatics." Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17. See in particular the discussion of impacts on SNYLF under Impacts 4.14-1 (Alt.2), 4.14-2 (Alt. 2), 4.14- 6 (Alt.2), 4.14-1 (Alt.3), 4.14-2 (Alt. 3), 4.14- 6 (Alt.3), 4.14-1 (Alt.4), 4.14-2 (Alt. 4), and 4.14- 6 (Alt.4).

0104-5, Visual Resources (VR)

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The comment states that the viewshed analysis "employs an inappropriate method," because "it uses high-resolution topographical mapping data and geographical information system technology to define the Project viewshed." The comment further states that the "analysis is misleading because it focuses entirely on the visibility of gondola towers within the viewshed, while failing to account for the proposed gondola mid-stations." The methodology for the viewshed analysis is described in Section 4.2.2 of the EIS/EIR. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility.

In addition to the viewshed analysis, 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives from a feasible selection (16) of representative locations. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed. The visual simulations analysis is also discussed in Section 4.2.2 of the EIS/EIR.

The analysis in the EIS/EIR is supported by substantial evidence.

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The Placer County General Plan Policy 1.K.1 is addressed specifically for each alternative in Section 4.2.3. CEQA requires only that inconsistencies with general plan goals and policies be identified and discussed (CEQA Guidelines, §§ 15125, subd. [d]). The Draft EIS/EIR does this (please refer to the Draft EIS/EIR, pp. 4.2-23 thru -24). Further, Policy 1.K.1 was not adopted as a threshold of significance under CEQA, so it does not dictate a new significant impact finding as to Impact 4.2-1 (Consistency with Federal, State and Local Regulations). Thus, a new significant impact finding is not warranted under CEQA and recirculation of the document is unnecessary. The Final EIS/EIR has been updated to further clarify that all alternatives would be, to a certain degree, inconsistent with Placer County General Plan Policy 1.K.1 which states: "The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

- a. Avoids locating structures along ridgelines and steep slopes;
- b. Incorporates design and screening measures to minimize the visibility of structures and grated areas;
- c. Maintains the character and visual quality of the area." (Placer County General Plan, p. 39)."

By their very nature, gondolas and ski lifts must extend along steep slopes to achieve their purpose. Given that the gondola is intended to connect the two ski resorts, all three action alternatives must also cross over the ridgeline which separates the two valleys. As such, it is not possible for the

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gondola to avoid slopes and ridgelines, but rather the design must rely on other means to screen and minimize the visible impacts of the infrastructure. Specifically the design of each alignment takes advantage of existing topography and vegetation to shield views as well as incorporates design standards via RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3. It is acknowledged that the Alternative 2 alignment traverses a lengthy distance of the sparsely vegetated ridgeline, whereas Alternatives 3 and 4 cross over the ridgeline in one discrete location before diving down into “Catch Valley”, thus limiting the visible impacts of the Alternative 3 and 4 gondola infrastructure to a greater extent than Alternative 2. With these design measures in place, all three gondola alignments achieve consistency with the goals and policies of Policy 1.K.1.

0104-5 cont'd	under the preferred Alternative 2 calls for a gondola route along ridgelines and steep slopes which is not consistent with the Placer County General Plan Policy 1.K.1.
0104-6	The Project study area is an especially fragile ecosystem. The DEIR/S acknowledges the potential for severe hydrologic and water quality impacts but stops short of providing the analysis of these impacts required by CEQA and NEPA. The Project study area occurs upstream of two tributaries to the middle Truckee River, Squaw Creek, and Bear Creek. Within the Alternative 2 study area, there are a total of 1.65 acres of aquatic resources, but a formal delineation of jurisdictional features associated with each action alternative has not been conducted to confirm the exact boundaries of waters and wetlands.
0104-7	The DEIR/S addresses the Project's potential to violate water quality standards. The document first provides an overview of the nature of the analysis that should be undertaken to evaluate the context and intensity of the Project's impacts on water quality. Factors to be addressed include the creeks' hydrologic function, stream health, rate and amount of runoff, stream sedimentation (both suspended and sand-size portion of bedload sediment), and slope stability. Part of this evaluation should address TMDL adopted for sediment in the creeks. As the DEIR/S acknowledges, given the sensitivity of Bear Creek and Truckee River and their upland environs to erosion and sedimentation, even small amounts of sedimentation could have harmful downstream effects. The potential for the Project to degrade water quality in this sensitive environment warrants a thorough impact analysis. Yet, other than identifying the amount of land and vegetation that would be disturbed by each of the Project Alternatives the DEIR/S provides only a vague discussion of the types of impacts that could theoretically occur. The DEIR/S's treatment of potential impacts on water quality falls well short of legal standards as it is cursory and not quantitative.
0104-8	Analysis of greenhouse gas (GHG) emissions is essential under CEQA and NEPA. Scientists agree that existing conditions are such that we have already exceeded the capacity of the atmosphere to absorb additional GHG emissions without risking catastrophic and irreversible consequences. Therefore, even seemingly small additions of GHG emissions into the atmosphere must be considered cumulatively considerable. This DEIR/S concludes that the Project would result in less-than-significant impacts related to greenhouse gas emissions. However, as detailed above, the DEIR/S presents an incomplete description of the Project and its construction activities, which results in a flawed greenhouse gas analysis.
0104-9	3. The DEIR/S's Analysis of Alternatives Is Inadequate. A proper analysis of alternatives is essential to comply with the CEQA/NEPA mandate that significant environmental damage be avoided or substantially lessened where feasible. The fundamental goal that the public be fully informed as to the consequences of action by their public officials. The discussion of alternatives must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the Project. The DEIR/S is defective because it fails to consider a reasonable range of alternatives, including any alternative other than a gondola to provide access between the two resorts. To be

0104-5 cont'd, Visual Resources (VR)

0104-6, Hydrology and Water Quality (H&WQ)

This comment states that the Draft EIS/EIR does not provide an adequate analysis of hydrology and water quality impacts under CEQA and NEPA because a delineation of U.S. jurisdictional waters has not been completed. A wetland delineation would be required if, after selection of a project alternative and completion of project design, impacts to wetland resources cannot be fully avoided, consistent with the process described in RPM BIO-26. In that instance, a wetland delineation would be prepared and reviewed by the U.S. Army Corps of Engineers (USACE) and the California Department of Fish and Wildlife prior to project implementation, in anticipation of permit acquisition. Completion of a wetland delineation could potentially result in small adjustments to the acreages of jurisdictional features identified in the EIS/EIR; however, adjustments would likely be in the scale of tenths or hundredths of acres. Any modifications would not be sufficient to alter the impact conclusions in the EIS/EIR, or the ability to compare environmental effects across alternatives. In addition, RPM BIO-26 requires wetland impacts to be avoided and minimized, and any unavoidable disturbance to wetlands would be restored or otherwise mitigated consistent with USACE no net loss standards.

The hydrology and water quality analysis in Section 4.17 of the Draft EIS/EIR analyzes the potential effects on water quality for the alternatives. The EIS/EIR uses best available information related to the project as described in Section 4.17.2.1, "Methods and Assumptions." Based on this information and the application of provisions in the

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RPMs to the project, the Draft EIS/EIR found that the project would have adverse and mitigated effects under NEPA, and less than significant effects with implementation of RPMs under CEQA.

0104-7, Hydrology and Water Quality (H&WQ)

This comment states that the impact analysis conducted for water quality in Impacts 4.17-1 and 4.17-2 should include a discussion of the TMDL adopted for the Truckee River. It also suggests several factors (hydrologic function, stream health, rate and amount of runoff, stream sedimentation, and slope stability) that could be considered for the analyses under these impact statements. Please see response to comment 0166-15. Comment 0166-15 repeats much of the same language provided in this comment.

0104-8, Greenhouse Gases (GHG)

The comment states that the GHG analysis is flawed because the project description is incomplete. Please see responses to comments 0104-2 and 0166-6 regarding the project description.

Emissions associated with construction and operation of the project are shown, by source, in Table 4.11-1 of the Draft EIS/EIR. Construction activities that were evaluated include site preparation, grading, building construction, and mobile-sources from worker commute, vendor deliveries, and material hauling activities. Operational-related emissions included increases in vehicle traffic associated with increased skier days, operation of the gondola, and long-term maintenance activities.

0104

The EIS/EIR explains that PCAPCD has adopted construction thresholds of significance of 10,000 metric tons of carbon dioxide equivalent CO₂e/year and operational thresholds of significance of 1,100 MT CO₂e/year. (Draft EIS/EIR, p. 4.11-9.) Discussions for Impact 4.11-2 (Alt.2), Impact 4.11-1 (Alt. 3), and Impact 4.11-1 (Alt. 4) compared project construction and operational emissions to these thresholds and demonstrated that emissions will not exceed either one. The conclusion in the EIS/EIR that greenhouse gas emissions would be less than significant is supported by substantial evidence. Also see response to comment 0072-11, which addresses similar issues. No further analysis or mitigation is necessary.

0104-9, Alternatives (A)

Please see response to comment #0072-5 regarding the alternatives analysis in the EIS/EIR.

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cont'd

reasonable, the range of alternatives analyzed in an EIR/S must provide enough variation from the proposed project “to allow informed decision making” regarding options that would reduce environmental impacts. In this case, all three alternatives include roughly the same number of towers (between 33 and 35), 2 base terminals and 2 mid-stations, and 8 Gazex Exploders. The alternatives would also all disturb roughly the same amount of land.

Due to the lack of clear distinctions among alternatives, as the DEIR/S explains, there is very little difference in environmental effects among them. For example, all of the alternatives would have significant and unavoidable impacts on biological and visual resources, traffic, and noise. As the primary purpose of alternatives analysis under CEQA and NEPA is to explore options to proposed actions that will adversely affect the environment, assessing slightly different variations of proposals with essentially identical environmental effects does not constitute an adequate alternatives analysis. Notably, the DEIR/S fails to seriously evaluate non-gondola alternatives. The NFA encourages the County and the Forest Service to consider evaluate alternatives that could achieve Project objectives without the negative environmental impacts attendant to the proposed gondola.

0104-10

In light of these likely adverse environmental effects, members of the NFA feel strongly that the County and Forest Service must consider a feasible and prudent alternative to the gondola—one that does not impact the Granite Chief Wilderness, Squaw Saddle, and the Five Lakes Trail. The Act also requires that the Service include all possible planning to minimize harm to this land. Because the EIR/S lacks an adequate range of alternatives, but instead promotes only the gondola, any approval of the Project would violate the stated goals of both CEQA and NEPA and the DEIR/S should not be approved in its present form.

Respectfully submitted,

Richard Mackey, DVM
NFA President

0104-9 cont'd, Alternatives (A)

0104-10, Summary (S2)

The comment states that because the Draft EIS/EIR lacks an adequate range of alternatives, approval of the project would violate the goals of NEPA and CEQA, and therefore the Draft EIS/EIR should not be approved. The analysis in the EIS/EIR is adequate and is supported by substantial evidence. No changes are necessary in response to this comment.



Plan Review Team
Land Management

PGEPlanReview@pge.com
6111 Bollinger Canyon Road 3370A
San Ramon, CA 94583

0127**0127-1, Utilities (U)**

The Forest Service and County appreciate PG&E's review of the project plans. The applicant, in collaboration with the Forest Service and County, will work with PG&E as project planning continues to ensure that the project complies with applicable laws and requirements regarding gas and electric facilities.

June 11, 2018

Shirlee Herrington
Placer County
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Squaw Valley, Alpine Meadows Base-to-Base Gondola Project
Squaw Valley and Alpine Meadows

Dear Shirlee Herrington:

0127-1

Thank you for giving us the opportunity to review your plans. The proposed Squaw Valley, Alpine Meadows Base-to-Base Gondola Project dated April 27, 2018 does not appear to interfere with any existing PG&E facilities or easement rights; therefore, we have no comments at this time.

Please note that this is our preliminary review and reserve the right for future review as needed. If there are subsequent modifications made to your design, we ask that you resubmit your plans to the email address listed below.

In the event that you require PG&E's gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>

If you have any questions regarding our response, please contact the PG&E Plan Review Team at (877) 259-8314 or pgeplanreview@pge.com.

Sincerely,

PG&E Plan Review Team
Land Management

0135

Shirlee Herrington

From: PGE Plan Review <PGEPlanReview@pge.com>
Sent: Monday, May 07, 2018 1:09 PM
To: Placer County Environmental Coordination Services
Subject: Alpine Meadows Base-to-Base Gondola Proj.
Attachments: PGE_Plan_Review_StepbyStep_Guide_20180411.pdf; Initial_Response_Letter_18_05_07.pdf

Dear Shiree Herrington,

0135-1 | Thank you for submitting the Alpine Meadows Base-to-Base Gondola Proj. plans. The PGE Plan Review Team is currently reviewing the information provided. We will respond to you with project specific comments prior to the provided deadline. Attached is general information regarding PGE facilities for your reference.

This email and attachment does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed.

*****Please note the new process for PG&E Plan Reviews [attached]. To avoid future delays please update your records and send requests to the below email address*****

Thank you,

Plan Review Team
6111 Bollinger Canyon Rd., 3rd Floor
Mail Code BR1Y3A
San Ramon, CA 94583
pgeplanreview@pge.com

*****This is a notification email only. Please do not reply to this message.***

0135-1, Summary (S2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.



Plan Review Team
Land Management

PGEPlanReview@pge.com
6111 Bollinger Canyon Road 3370A
San Ramon, CA 94583

0135

0135-2, Utilities (U)

The Forest Service and County appreciate PG&E's review of the project plans. The project applicant, in coordination with the Forest Service and County, will work with PG&E as project planning continues to ensure that the project complies with applicable laws and requirements regarding gas and electric facilities.

May 7, 2018

Placer County Community Development Resources Agency
Shirlee Herrington
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Ref: Gas and Electric Transmission and Distribution

Dear Shirlee Herrington,

Thank you for submitting Alpine Meadows Base-to-Base Gondola Proj. plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management



Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <http://usanorth811.org/wp-content/uploads/2017/05/CA-LAW-English.pdf>

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches $[24/2 + 24 + 36/2 = 54]$ away, or be entirely dug by hand.)



Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes,



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service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.



Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as **"RESTRICTED USE AREA – NO BUILDING."**
2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&E's facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 15 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.
8. Streets and Roads: Access to facilities to be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for



proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.



PG&E Preliminary Document and Plan Review Step-by-Step Guide

When planning a development project, it is important that any new buildings or landscaping are located a safe distance from overhead and underground utility lines. Pacific Gas and Electric Company (PG&E) has developed the following 3-step guide to assist cities/counties, builders, and developers with ensuring preliminary plans are compatible with any PG&E electric or gas facilities in the area.

STEP 1 SUBMIT

Please send all environmental and preliminary planning documents to pgeplanreview@pge.com or 6111 Bollinger Canyon Rd., 3rd Floor, Mail Code: BR1Y3A, San Ramon, CA 94583. Planning documents include (but may not be limited to): Environmental Documents, subdivision maps, general city/county plans

**This plan review process does not replace the application process for PG&E gas or electric service that development plans may require. For these requests, please continue to work with PG&E service planning department. See link Below:*

<https://www.pge.com/cc/>

STEP 2 REVIEW

PG&E will review the planning documents to confirm:

- Plans are compatible with any existing or proposed gas or electric facilities
- If a Public Utility Easement or Dedicated Easement is needed for new facilities
- Compliance with existing easement, if applicable

STEP 3 RESPONSE

Within 45-days of submission, PG&E will issue a response letter.

- If no impacts were identified, PG&E will provide approval to preliminary plans, along with any requirements that must be followed as the project moves forward.
- If impacts were identified, PG&E will provide comments to the submitter to update and re-submit the plans.

For More Information

For more information, or to check the status of your plan review, please contact PG&E Land Management Department at 1-877-259-8314. PG&E will follow-up with you within two business days.

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June 9, 2018

Placer County Planning Department
 Attn: Shirlee Herrington, Env. Coordination Services
 3091 County Center Drive
 Auburn, CA 95603
cdraecs@placer.ca.gov

Tahoe National Forest, Truckee Ranger District
 c/o NEPA Contractor
 P.O. Box 2729
 Frisco, CO 80443
Comments@squawalpinegondola-eis.com

Subject: Proposed Squaw Valley-Alpine Meadows Base-to-Base Gondola Project Draft EIS/R

Dear Ms. Herrington and Mr. Ilano:

0144-1 | The Friends of the West Shore (FOWS) and Sierra Club, Tahoe Area Group (SCTAG) appreciate this opportunity to provide comments on the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Proposed Squaw Valley-Alpine Meadows Base-to-Base Gondola Project. FOWS and SCTAG are very pleased with the inclusion of two feasible¹ Alternatives (3 and 4) which locate the gondola off of the 'ridge' and out of the privately-owned portion of the Granite Chief Wilderness Area (GCWA) as it would be in the proposed project (Alternative 2). We appreciate the time and effort of Placer County and U.S. Forest Service (USFS) to develop these alternatives.

0144-2 | We are concerned with the extensive impacts the Proposed Project (Alternative 2) would have on the environment and communities in and around Alpine Meadows and Squaw Valley and within the Lake Tahoe Basin, however our comments focus more heavily on Tahoe Basin impacts. Although Alternatives 3 and 4 create fewer impacts than the proposed Alternative 2, both alternatives result in numerous unmitigated environmental and public health and safety impacts. Further, for all action alternatives there are technical inadequacies which need to be sufficiently addressed in the Final EIS/R.

0144-3 | We hope these comments will assist Placer County and the USFS with the development of a comprehensive, technically-adequate FEIS/R, which sufficiently examines and discloses the impacts of the project and includes adequate mitigation. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net or Laurel Ames at amesl@sbcglobal.net if you have any questions.

Sincerely,

Judith Tornese,
 President
 Friends of the West Shore

Laurel Ames,
 Conservation Chair
 Sierra Club, Tahoe Area Group

Jennifer Quashnick
 Conservation Consultant
 Friends of the West Shore

¹ Various gondola alignments that would connect the Alpine Meadows and Squaw Valley base areas without traversing the ridgeline separating the National Forest System-GCW and the Caldwell property are feasible." (p. 4.2-24)

0144-1, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

0144-2, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0144-3, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

FOWS & SCTAG comments on Draft EIS/R for proposed AM/SV Base to Base Gondola

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Alternatives selected for analysis (Section 2):

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Conservation option for privately-owned land within Granite Chief Wilderness Area:

Numerous public comments on the NOP (including ours) regard the need to evaluate an alternative which involves public purchase and/or a conservation easement across the privately-owned lands within the Congressionally-designated GCWA. This option could be incorporated into Alternatives 3 and/or 4 and contribute toward mitigation for the impacts to wilderness values (as our comments discuss below, these impacts remain adverse and are not mitigated by the included measures).²

The Final EIS/R must address these significant public comments, and consider such a purchase and/or a conservation easement for the privately-owned lands within the Congressionally-designated GCWA.

Alternative Route Alignments and Alternative Technologies³ not evaluated further:

0144-5

The discussion of Alternative Route Alignments considered but not evaluated further in section 2.3.2.2 is deficient. Scoping respondents suggested a considerable number of alternative alignments which they believed might reduce environmental impacts and/or transport skiers more efficiently. These suggestions deserve more complete and thoughtful responses than the cursory dismissal in section 2.3.2.2. For example, alignments to the east of Alternatives 3 and 4 might have some substantial benefits. These benefits would include greater separation from the Granite Chief Wilderness Area and

² Namely Impact 4.3-3: Effects on Natural Wilderness and Impact 4.3-4: Effects on Opportunities for Solitude or Primitive and Unconfined Recreation.

³ Further evaluation of the Alternative Technologies listed in section 2.3.2.4 is not necessary.

0144-4, Alternatives (A)

Placer County and the Forest Service reviewed and considered all scoping comments provided in response to the NOP. The comment proposes an alternative that is beyond the scope of this EIS/EIR. Specifically, the comment refers to public comments on the NOP regarding the need to evaluate an alternative that includes "public purchase and/or a conservation easement across the privately-owned lands within the Congressionally-designated GCWA." The comment suggests that such action could be incorporated into Alternatives 3 and/or 4 to contribute toward mitigation for the impacts to wilderness values. Management of privately owned lands within the congressionally mapped Granite Chief Wilderness are not under the jurisdiction of the TNF.

Chapter 4.3 of the Draft EIS/EIR, moreover, explains that the project's potential effects on wilderness areas is a federal issue and therefore not necessary to satisfy the requirements of CEQA (Draft EIS/EIR, page 4.3-1). As explained, the effects would be either "no effect" or "minimally adverse" depending on the alternative (refer to Table 4.3-1). As such, no mitigation or alternative as suggested by the comment is required. The requested inclusion of a conservation easement across privately owned lands is also infeasible because there is not a willing seller. The analysis process for the EIS/EIR has included numerous discussions with Mr. Caldwell, the private landowner, regarding his property. Mr. Caldwell has been very clear that the Caldwell Property is not available for purchase or easement.

0144-5, Alternatives (A)

The comment provides an opinion that the EIS/EIR discussion in Section 2.3.2.2, explaining why various other suggested alternative alignments for the gondola were not fully considered in the document, is inadequate. Section 2.3.2.2 of the EIS/EIR explains that mountain resort planners and lift equipment engineers reviewed and considered 39 additional conceptual alignments, including those suggested as part of the NOP comments, as part of the planning and analysis in the EIS/EIR (please also refer to Appendix A [scoping summary]).

The comment states that alignments to the east of Alternatives 3 and 4 "might have" some substantial benefits, including greater separation from the National Forest System-GCW and therefore "might include" reduced visual impacts. No evidence

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is offered in support of these statements. CEQA requires that lead agencies consider a "reasonable range" of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project in detail, not every alternative or mitigation measure suggested by comments. NEPA also requires federal lead agencies to consider a range of alternatives. The EIS/EIR includes a reasonable range of alternatives. The commenter's opinion is nevertheless noted and will be forwarded to the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors to take into consideration when making a decision regarding the project.

FOWS & SCTAG comments on Draft EIS/R for proposed AM/SV Base to Base Gondola

0144-5 cont'd	might include reduced visual impacts from numerous viewpoints in the vicinity of the Wilderness and elsewhere.
0144-6	<p>An adequate discussion could be based upon a "constraints map" delineating constraint areas with technical or design challenges which preclude feasible alignments across these areas. A "constraints map" would be very informative. Suggestions for optimizing the constraints map include:</p> <ul style="list-style-type: none"> • Each constraint area is defined by its set of constraints, and there may be contiguous constraint areas defined by different sets of constraints; the boundaries between contiguous constraint areas should be shown on the map. • Constraint areas should be identified by numbers, letters, or other symbols, and the existing constraints on each area should be listed and described in a text paragraph. • The more explicit and quantitative the descriptions of the constraints on each area, the better.
0144-7	<p>Presumably considerable portions of the ridge separating Squaw and Alpine are not feasible locations for a mid-station because creating a sufficiently large flat area would require excessive grading. The remainder of the ridge would be within constraint zones delineated on the map and described in the text accompanying the map. On the other hand, "Excessively steep terrain" is among the cited constraints,⁴ however the never-completed KT South lift rises straight up to the vicinity of KT-22; presumably the designer of that lift considered that route feasible.</p> <p>If a constraint map is created, each assertion that a suggested alternative alignment or group of alignments is infeasible could be justified by pointing out that the alignment would cross one or more constraint areas.</p> <p><i>The FEIS/R should provide additional analysis of alternatives that were dismissed by the DEIS/R. A "Constraints Map" as discussed above is recommended as one option to ensure adequate review and disclosure.</i></p> <p>Visual Resources (Section 4.2):</p>
0144-8	<p><u>Presentation of data:</u></p> <p>Some of the information on the visual simulation pages in Appendix D is more confusing than helpful. Relating the small insets showing the field of view to the large view is difficult. The portions of the small insets which are hidden from the viewpoint by intervening topography are not identified by, for example, shading. Whether the alignment crossing the field of view is in fact visible may be uncertain. If an alignment crossing a field of view is in fact hidden by topography, why not include that fact in the caption?</p> <p>Exhibit 4.2-3 would be even more informative if an arrow showing the direction of the view were added to each dot denoting a viewpoint location. An enlargement of the area containing viewpoints 9-14 might have to be added to the document.</p> <p><i>The way information is displayed should be improved for clarity in the FEIS/R.</i></p> <p>⁴ "Each alternative alignment considered includes specific technical or design challenges. For example, some issues include excessively steep terrain..." (p. 2-31)</p>

0144-5 cont'd, Alternatives (A)

0144-6, Alternatives (A)

The comment suggests that a "constraints map" be prepared and provided as part of the EIS/EIR. While commenters may find such a map helpful, it is not required for inclusion in the EIS/EIR to justify the alternative alignments studied in full (*Clover Valley Foundation v. City of Rocklin* [2011] 197 Cal. App. 4th 200, 245 [agency not required to conduct every requested study]). Various constraints were considered during preparation of the project's alternatives, including the mountainous terrain referred to in Comment 0144-7 below, and the avoidance of sensitive resources (e.g., Section 4.12 [avoidance of sensitive vegetation]; Section 4.13 [avoidance of special status botanical species]; and Section 4.15 [avoidance of wetlands]).

0144-7, Alternatives (A)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0144-8, Visual Resources (VR)

The comment expresses confusion with the visual simulations in Appendix D, and more specifically with the topographic squares provided with each simulation. The topographic squares (or small insets as characterized by the comment) were included to provide the reader with a framework within which to identify the surrounding geographic area shown in the visual simulation, including (as shown in red) where the various alignments would be located. While including arrows and a description of topography could be helpful to some, it is not necessary to be included with the visual simulations for the EIS/EIR to adequately convey the alignment of each alternative (and the potential visual effects of each) to the reader. Because the comment does not provide specific evidence or reasons specifying why the Draft EIS/EIR is inadequate, a further response is unwarranted.

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FOWS & SCTAG comments on Draft EIS/R for proposed AM/SV Base to Base Gondola

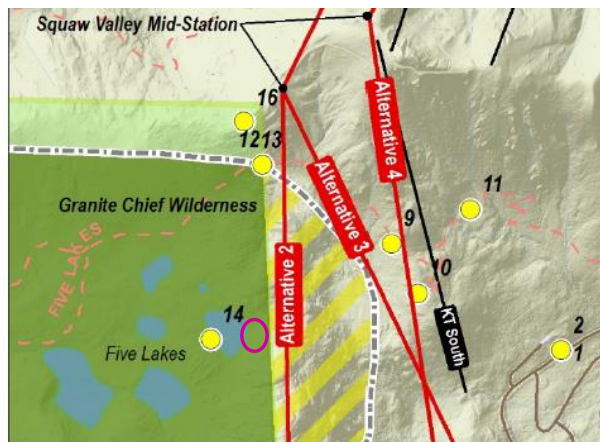
0144-9

Additional viewpoints within Five Lakes Basin:

The Five Lakes basin is the most popular hiking destination within the Granite Chief Wilderness, and all hikers will spend time at one or more of the lakes. The visual impacts of alternative gondola alignments from viewpoints on the lakeshores are therefore some of the most significant visual impacts. Viewpoint 14, the only viewpoint within the Five Lakes Basin, is on the western shore of the most easterly of the lakes; the impact of the Alternative 2 alignment on views to the east is significant. The Alternative 3 and 4 alignments appear to be hidden from viewpoint 14 by intervening topography.

In views from the eastern shore of the lake and points between the eastern shore and the section line, the Alternative 2 alignment would dominate easterly views, and the Alternative 3 and 4 alignments might be visible. Views from these points would be more informative than views from Viewpoint 14; they would be more conservative in the sense of showing the most adverse visual impacts from a popular destination in the Five Lakes Basin. These views would more sharply differentiate a visual impact of Alternative 2 from the corresponding impacts of Alternatives 3 and 4.

The FEIS/R should include analysis from an additional viewpoint on the east shore of the eastern lake as depicted below by the purple circle:



0144-10

The DEIS/R concludes visual impacts from all action alternatives to be "mitigated" per NEPA, and significant and unavoidable or less than significant for CEQA, as follows.

0144-9, Visual Resources (VR)

The comment asserts that the Final EIS/EIR should include an additional viewpoint on the east shore of the eastern lake shown in Viewpoint 14 of the Five Lakes. In the commenter's view, views from this vantage point would "be more informative than views from Viewpoint 14" by showing the differentiation between Alternative 2 from Alternatives 3 and 4 and from within the Five Lakes Basin. It was determined that Viewpoint 14 would be located on the west side of the lake and not the east side because of observations by local land managers that most of the use at this lake occurs on the west side (as hikers ascend the trail and come to the lake, few actually walk around the lake); therefore, views from the west side of the lake were determined to be more sensitive (looking towards the proposed gondola) than from the east side. As explained and shown in the Draft EIS/EIR, during the summer, only the gondola wires would be partially visible from View 14 under Alternative 2 (please refer to Draft EIS/EIR, pages 4.2-28 through 4.2-29).

Nevertheless, Alternative 2 was found to have a significant and unavoidable impact on visual resources because it would be visible from 20 of the 21 views for which visual simulations were created, and because of the sensitive and remote nature of the area (including the Five Lakes area). Substantial evidence therefore supports the visual impacts analysis. The commenter's disagreement with the conclusions of the Draft EIS/EIR and desire for the creation of an additional viewpoint does not establish that the analysis leading to the conclusions in Section 4.2, "Visual Resources" of the Draft EIS/EIR was inadequate. (See *North Coast Rivers Alliance v. Marin Municipal Water Dist.* [2013] 216 Cal. App. 4th 614, 627-28; *Assn. of Irrigated Residents v. County of Madera* [2003] 107 Cal. App. 4th 1383, 1397 ["CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project"]; see also *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* [1988] 47 Cal. 3d 376, 415-416 [agency has discretion to decline to perform further studies]).

The 21 visual simulations created for each alternative, moreover, allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives from a selection (16) of representative locations, which were selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying

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conditions between the winter and summer months. They are also visible to a greater number of people traveling along the roads or from the base terminal. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative.

The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be, or were required to be, simulated for the purposes of this EIS/EIR. Instead, highly frequented or prominent public areas and visually sensitive vistas were selected for simulation.

For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0144-10, Visual Resources (VR)

The comment is an introductory statement summarizing the conclusions in the Draft EIS/EIR and expressing the view of the commenter that different conclusions should have been reached. The comment does not offer any evidence or explanation; thus, a further response is unwarranted.

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Table ES-3 Summary of Resource Topics with Impacts and RPMs and/or Mitigation Measures

Resource Topics/Impacts	Environmental Effects before Mitigation (by Alternative)		RPMs and/or Mitigation Measures			Environmental Effects after Mitigation (by Alternative)	
	NEPA	CEQA	NE - No effect	PS - Potentially significant	S - Significant	NEPA	CEQA
Adv - Adverse	B - Beneficial	LTS - Less than significant	N/A - Not applicable			SU - Significant and unavoidable	
4.2 Visual Resources							
Impact 4.2-1: Consistency with Federal, State, and Local Regulations	Alt 1 = NE Alt 2 = Adv Alts 3, 4 = LTS	Alt 1 = NE Alt 2 = S Alts 3, 4 = LTS	Alt 1 = No mitigation measures are required Alts 2, 3, 4 = RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3			Alt 1 = NE Alt 2 = Mitigated Alts 3, 4 = LTS	Alt 1 = NE Alts 2, 3, 4 = LTS
Impact 4.2-2: Visual Character (General Impact on Visual Character)	Alt 1 = NE Alt 2 = Adv Alts 3, 4 = Minorly Adv	Alt 1 = NE Alts 2, 3, 4 = S	Alt 1 = No mitigation measures are required Alts 2, 3, 4 = RPMs SCE-1 through SCE-4, SCE-6, and SCE-7			Alt 1 = NE Alts 2, 3, 4 = Mitigated	Alt 1 = NE Alts 2, 3, 4 = SU
Impact 4.2-3: Night Lighting and Glare	Alt 1 = NE Alt 2 = Adv	Alt 1 = NE Alts 2, 3, 4 = S	Alt 1 = No mitigation measures are required Alts 2, 3, 4 = RPMs SCE-5 and SCE-8			Alt 1 = NE Alts 2, 3, 4 = Mitigated	Alt 1 = NE Alts 2, 3, 4 = LTS

However, as reflected in detailed comments following the list below, there are problems with the DEIS/R that do not support these conclusions. Based on information provided in the DEIS/R (or a lack of such information):

- NEPA: All action alternatives have “adverse” impacts to all three visual resource topics (although further exploration and documentation are needed to assess Impact 4.2-3);
- CEQA: Impact of Alternative 2 on Impact 4.2-1 should be Significant and Unavoidable; and
- CEQA impacts of all action alternatives for Impact 4.2-3: Night lighting should disclose Potentially Significant unless and until adequate information is provided to assess significance.

All action alternatives:Impacts on potential future consideration of public land purchase of privately-owned area within the Congressionally-designated GCWA:

The DEIS/R does not include any viewpoints from within the privately-owned portion of the Congressionally-designated GCWA boundary. As Alternative 2 would place development in this location that would likely prevent the land from being considered for purchase by the public (USFS) and/or a conservation easement, the impacts to all resources must be clearly disclosed.

The FEIS/R must include a viewpoint which reflects the existing conditions and anticipated impacts on the visual qualities within this area. This viewpoint should also be part of the discussion regarding the individual and cumulative (e.g. the proposed White Wolf Subdivision) impacts to and from this privately-owned land within the GCWA (a discussion that is generally lacking in the DEIS/R, as noted elsewhere in our comments).

Visual simulations of gondolas on the cable line during non-white conditions:

The DEIS/R discloses that there are times when the gondola cabins will be in use while the surrounding landscape may not be fully covered with snow, and during these times the white gondolas would contrast heavily with exposed vegetation and dirt in the background, creating greater visual impacts.⁵ The DEIS/R also states that throughout the summer, all gondola cabins will

⁵ “However, during the transitional seasons (defined as the early and late ski seasons) and periods of inconsistent snow cover (which are possible during both the transitional seasons and mid-season), it is possible that Alpine Meadows would still be open for public skiing and snowboarding and the gondola would be operational, and that at the same time southern aspect slopes of the project area would be mostly dry. During these scenarios, the

0144-10 cont'd, Visual Resources (VR)

0144-11, Visual Resources (VR)

The comment implies that the Draft EIS/EIR should have included a visual simulation of Alternative 2 from within the private lands within the congressionally mapped GCW (or the Caldwell property) because Alternative 2 would “prevent the land from being considered for purchase by the public (USFS) and/or conservation easement.” Views 5 through 8 include the Caldwell property, from which the potential visual effects of the project under each alternative were considered. Additional views from within the Caldwell property were therefore not required to be included in the Draft EIS/EIR to adequately assess the impacts of the project. Please refer to *North Coast Rivers Alliance v. Marin Municipal Water Dist.* (2013) 216 Cal. App. 4th 614, 627-28 for further information.

Section 4.2, “Visual Resources” of the Draft EIS/EIR includes an adequate number of viewpoints documenting the existing environment and showing, through simulations, how the proposed alternative alignments would impact the views from those vantage points, including views from private property. The potential future purchase of the private Caldwell property by the Forest Service, or any other entity, and establishment of a conservation easement on that land, are speculative and beyond the scope of this analysis. The proposed White Wolf Development, moreover, has not yet been approved and has not undergone design review. The White Wolf Development was included in the cumulative effects analysis of the Draft EIS/EIR with the conclusion that the White Wolf Development, if approved, would further reduce the visual character of some of the scenic vistas from within the National Forest System-GCW.

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives from a feasible selection (16) of representative locations. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view from all possible locations in the project area; therefore, not all locations could be simulated for the purposes of this EIS/EIR. As noted above, highly frequented or prominent public areas and visually sensitive vistas were selected for simulation to ensure a sufficient number of representative views were included. A

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viewpoint from the location suggested by the commenter was not chosen because of private land ownership and very low use by the public due to extreme difficulty in access to the area due to the general lack of trails and steep topography. However, this area is a highly scenic focal point in viewpoints located from along the Five Lakes Trail and the Alpine Meadows Base area, also as noted above.

For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0144-12, Visual Resources (VR)

The comment expresses concern that the summertime visual simulations included in the Draft EIS/EIR do not show the occasional time periods (up to 3-5 days per occasion and 10 times per summer/fall) when the white painted gondolas will be hanging on the gondola line and more visible due, in part, to the lack of snow and the contrast with the summer/fall colors (e.g., barren dirt, trees without snow, foliage, etc.). The Draft EIS/EIR does, however, disclose and explain that the white gondolas would be more noticeable from the selected viewpoints during these times because there would not be snow in the background that would blend with the color of the gondola cabins (please refer to p. 4.2-23 thru 4.2-24 of the Draft EIS/EIR). The EIS/EIR also explains that during most of the summer, only the gondola terminals/mid-stations, towers and wire-rope would remain visible in the upslope portions of the project area (p. 4.2-24), and refers the reader to Sections 4.1 and 4.3 for more information.

The periodic existence of the white gondolas contrasted with the dry summer/fall conditions would be similar to the existing infrastructure visible at ski resorts in the summer months. The funitel cars (which are white and purple), for example, are also visible from time to time at Squaw Valley. The old gondola, which the funitel replaced in 1998, also resulted in gondolas being visible during summer months. The temporary visibility of white gondolas proposed as part of the project would therefore not be unusual for projects of this nature and would not be unusual for the Squaw Valley and Alpine Meadows areas. The temporary visibility (for 3 to 5 days and up to 10 times per summer/fall) would also not result in a new significant aesthetic or visual impact, or a substantial increase in severity of the already identified significant and

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unavoidable visual impacts; therefore, no additional mitigation is required.

To address the last part of the comment, it is not known at this time exactly how many days the gondolas would be visible in the Summer/Fall. 3 to 5 days per occurrence for up to 10 occurrences is, however, a conservative assumption given existing maintenance needs for infrastructure and other lifts at the two resorts. Similarly, the number of cabins placed on the line during this time would not result in a substantial increase in visual impacts because they would remain spread out along the line and would be temporary in nature; thus, the precise number of gondolas and number of days that may be visible during the summer is not required for consideration of the potential visual impacts of the project and its various alternatives.

For additional information, please refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

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have to be put on the cable line for maintenance up to ten times, and that a limited number of cabins will be on the line for 3-5 days at a time. There are no simulations of what either of these scenarios could look like nor discussion of the visual impacts during the summer months, where existing views include rock cliffs, beautiful alpine flowers, and sparse-growing shrubs.

As this will happen every summer (compared to a one-year construction period), the FEIS/R must disclose the specifics of how often this will be done, how many cabins will also be placed on the line for 3-5 days, during what times and intervals, and include visual simulations of the impacts. Determination of when the gondola may be operational while snow conditions are limited (e.g. early season) could involve examining snow conditions and operations during the recent drought years (approx. 2012-2017). The FEIS/R must include mitigation for these impacts, including no gondola operation during times when snow conditions are limited such that gondola cabins would degrade visibility.

Night lighting/glare:

0144-13

The DEIS/R concludes no effect (NEPA) and less than significant (CEPA) impacts associated with night lighting for all action alternatives. Although it is recognized that such lighting will cause visual impacts from any locations the gondola will be visible from at night,⁶ the analysis simply speculates that impacts will be mitigated, including suggesting that impacts will be limited by gondola operation times that end “approximately” around 6:00 p.m.⁷

The FEIS/R must analyze and disclose the specific lighting and locations that will be part of the project and include visual representations of what lighting could look like for each alternative during dark periods. In addition, clear operation times must be required as part of the project. Simulations should also include viewpoints from locations along the Pacific Crest Trail.

Other viewsheds from within Tahoe Basin:

0144-14

The viewsheds mapped for all action alternatives indicate that the project may be viewable from other locations in the Tahoe Basin that are frequented by hikers and others who are more sensitive to visual impacts (p. 4.2-15 to 4.2-17), however states that such impacts were not simulated (although it does not disclose why).

Potential view impacts from locations such as Twin Peaks, Ward Peak, and the Pacific Crest Trail/Tahoe Rim Trail should be analyzed in the FEIS/R. This could be done in a similar fashion to how an additional simulation was included to assess the visual impacts of Alternative 4 on Lake Tahoe (p. 4.2-43).

white gondola cabins would contrast more heavily with the exposed vegetation and dirt in the background, causing the visual impacts associated with gondola infrastructure to be greater. The visual simulations do not account for these potential scenarios. Refer to Section 4.1, “Recreation,” and Section 4.3, “Wilderness,” for information on how this phenomenon may impact those resources.” (p. 4.2-24)

⁶ “Night lighting fixtures associated with the Gondola would cause visual impacts on any locations from which they are visible during nighttime hours.” (p. 4.2-31)

⁷ “The gondola would typically operate each day during the snow sports season from just before Alpine Meadows and Squaw Valley open until soon after closing (approximately 8:00 a.m. to 6:00 p.m.), so lighting fixtures would be activated only during a short period after sunset.” (p. 4.2-31)

0144-12 cont'd, Visual Resources (VR)

0144-13, Visual Resources (VR)

An analysis of impacts related to night lighting and glare is included in Section 4.2-3 of the Draft EIS/EIR. Under Alternative 2, for example, the EIS/EIR acknowledges that some lighting would be installed in the gondola cabins and planned operation buildings (base terminals). The lights would not, however, be installed on the towers (please refer to p. 4.2-31). Visibility of night lighting at base area terminals would also not constitute a considerable change from the existing environment, as explained in the EIS/EIR, as lighting would be used for maintenance outside of normal operating hours and to prepare for daily operations. The gondola would close at 6:00 p.m. so lighting would only be visible for a short time in the evening (4.2-31 thru 4.2-32). The lighting from the project to recreationists along the Pacific Crest Trail also would not occur during the summer/fall because the gondola would not be in operation and maintenance would occur during the daytime hours. The Draft EIS/EIR also identifies Resource Protection Measures (RPMs) which will be included in the MMRP or as conditions of approval and which include measures designed to avoid and minimize the lighting effects of the project. SCE-8, for example, requires the preparation and approval, by the County Development Review Committee, of a detailed lighting plan which requires nighttime lighting to be shielded and directed downward, and which prohibits lighting from being placed on top of structures such as the gondola towers (please refer to Appendix B, p. B-7).

0144-14, Visual Resources (VR)

The comment states that the project may be visible to recreationists from other surrounding locations such as Twin Peaks, Ward Peak and the Pacific Crest Trail/Tahoe Rim Trail and, therefore, should also be shown via additional simulations included in the Final EIS/EIR. Please refer to the discussion provided in the Draft EIS/EIR at p. 4.2-29, which states that Alternative 2 would not be visible from any parts of Lake Tahoe because of the distance between Lake Tahoe and the project area (p. 4.2-36), which is the same for Alternative 3. In addition, it is explained on p. 4.2-40 thru 4.2-41 that Alternative 4 would be visible from a narrow vantage point of Lake Tahoe thereby resulting in minorly adverse impacts under NEPA and

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significant and unavoidable under CEQA, despite the implementation of RPMs. Thus, the Draft EIS/EIR includes a good faith, reasoned analysis of the potential aesthetic impacts of the project. The EIS/EIR also provides a range of viewpoints under each alternative that illustrate the potential impacts of the project as compared to existing conditions. The regional viewshed analysis provides a qualitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures, in addition to the remote distance of the regional perspective.

Twin Peaks is located approximately 2 miles to the south of Alpine Meadows and approximately 4.6 miles south of Squaw Valley, on the border of the National Forest System-GCW. The peak is accessible to hikers and backcountry skiers. There are no paved roads to the top of Twin Peaks. During the summer, the summit can be reached via class 1 terrain from Blackwood Canyon Road or Alpine Meadows. Because Blackwood Canyon road is not plowed and most ski areas do not support trespassing, winter ascents must begin at the Blackwood Canyon Sno-Park on Highway 89 (please refer to <https://www.summitpost.org/twin-peaks/476605>). The project may be visible to hikers and backcountry skiers depending on where they are standing on the peak and what direction they are looking from. Due to the distance of the project from Twin Peaks, however, the visual effects will be either the same or less than the effects identified in the Draft EIS/EIR. Under CEQA and NEPA, a Draft EIS/EIR need not include every viewpoint requested by a commenter (see *North Coast Rivers Alliance v. Marin Municipal Water Dist.* [2013] 216 Cal. App. 4th 614, 625 [upholding EIR which included select visual simulations, including one which represented the "worst-case" aesthetic impact].)

Ward Peak is located just south of the Five Lakes area and is the highest peak within Alpine Meadows. As with Twin Peaks, a viewer would have to hike to the top of Ward Peak in order to see the project from that vantage point. Consequently, relatively few people would see the project (or Alternatives 3 or 4) from this view point and, due to the distance and intervening mountainous topography, the project (while potentially visible from certain vantage points) would not be visually imposing. A viewer from the top of Ward Peak would also already see ski lift infrastructure given that Ward Peak is adjacent to Alpine

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Meadows and considerable ski area infrastructure already exists there. The project would be consistent with this existing infrastructure. Although the Draft EIS/EIR does not include a visual simulation from the top of Ward Peak, it does include a sufficient number of simulations, including numerous simulations from Alpine Meadows Road, Chalet Road, and Five Lakes area to adequately demonstrate, in conjunction with narrative discussion, the visual impacts of the project to the reader. Under CEQA, for example, the analysis concluded that the aesthetic impacts of the project would be significant because project features would remain visible and would adversely affect scenic vistas and the visual quality of remote landscapes in a highly sensitive and mountainous area.

As explained above, the 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be simulated for the purposes of this EIS/EIR. Highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers were selected for simulation. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does not take into account potentially obscuring features, the view shed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

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Final tower locations:

Although simulations are said to show visual impacts, Chapter Two – Description of Alternatives – notes that the final tower locations may change.⁸

This must be clearly disclosed in the FEIS/R and measures to ensure proper public review and consideration of visual impacts when final tower locations are proposed must be included (including adequate disclosure and ample time for public review).

Alternative 2:

We concur with the determination that Alternative 2 would have adverse (NEPA) and significant (CEQA) impacts on visual resources. However, the technical evaluation must be thorough and sufficient, including the extent to which the alternative will impact visual resources. The DEIS/R contains several technical inadequacies which appear to underestimate the true impact of this alternative.

Development on the ridgeline:

The DEIS/R concludes Alternative 2's "adverse" impacts (NEPA) with regards to consistency with federal, state, and local regulations (Impact 4.2-1)⁹ as Policy 1.K.1 in the Placer County General Plan directs that "new development in scenic areas is required to be designed in a manner that avoids locating structures along ridgelines and steep slopes." The DEIS/R relies upon this same consideration to address CEQA criteria regarding scenic vistas.¹⁰ The DEIS/R then claims this impact to be mitigated by RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3.¹¹ However, these RPMs generally address design specifications (e.g. colors, future design review, etc.) – they do not remove the structure from the ridgeline and therefore they do not mitigate this impact.

The FEIS/R must document this impact as adverse by NEPA and Significant and Unavoidable per CEQA, even with "mitigation." This error must also be corrected in the discussion of the summary

⁸ The project applicant has provided preliminary tower locations that are used in this EIS/EIR; however, exact locations and designs for each tower have not been determined at this time. Determination of exact tower placement will be part of final project engineering and design once a single alternative has been selected (i.e., if an alternative is approved at the conclusion of the NEPA/CEQA process). On NFS lands, final engineering and design will require consultation with the Forest Service hydrologist/soil scientist and other technical specialists as appropriate. Placer County will have a similar role in final engineering and design on non-NFS lands. Four "tower zones" (Zones A, B, C, and D) have been delineated in Exhibits 2-3, 2-4, 2-5, and 2-6 to highlight areas with similar site conditions for tower placement. Details about tower construction are discussed below. 2-12

⁹ "Placer County General Plan...Policy 1.K.1 directs that new development in scenic areas is required to be designed in a manner that avoids locating structures along ridgelines and steep slopes. The gondola alignment associated with Alternative 2 would extend along the ridgeline separating the National Forest System-GCW and the Caldwell property, which would represent an inconsistency with Policy 1.K.1." (p. 4.2-23)

¹⁰ "Each of the relevant views listed above provides an expansive perspective of a highly valued natural landscape, all of which could be considered scenic vistas. As a result, the above analysis under "ridgelines and sparsely vegetated hillsides" is intended to address the first of the CEQA criteria listed above in Section 4.2.2.2, which pertains to substantial adverse effects potentially occurring to scenic vistas." (p. 4.2-29)

¹¹ "Under NEPA, and considering the NEPA indicators, absent RPMs and/or mitigation, direct and indirect effects related to consistency with federal, state, and local regulations would be adverse. Implementation of RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3 would mitigate this effect." (p. 4.2-23)

0144-15, Visual Resources (VR)

The comment is correct that the final tower locations may change from those conceptually depicted under each alternative in the visual simulations. This is because the project has not been approved and, therefore, final engineering and design plans have not yet been prepared (see *Dry Creek Citizens Coalition v. County of Tulare* [1999] 70 Cal. App. 4th 20, 36 [engineering designs not required where agency has insufficient information to analyze impacts]).

Though it is possible that the locations of specific towers could change as engineering becomes finalized prior to potential implementation of the project, all changes would be reviewed and determined to be (or not to be) in substantial compliance with the original analysis. If substantial changes are proposed to the tower locations, additional review and analysis may be necessary.

0144-16, Visual Resources (VR)

CEQA requires only that inconsistencies with general plan goals and policies be identified and discussed (CEQA Guidelines, §§ 15125, subd. [d]). The Draft EIS/EIR does this (please refer to Draft EIS/EIR, pp. 4.2-23 thru -24). Further, Policy 1.K.1 was not adopted as a threshold of significance under CEQA, so it does not dictate a new significant impact finding as to Impact 4.2-1 (Consistency with Federal, State and Local Regulations). Thus, a new significant impact finding is not warranted under CEQA.

The Final EIS/EIR has been updated to further clarify that all alternatives would be, to a certain degree, inconsistent with Placer County General Plan Policy 1.K.1, which states: "The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

- Avoids locating structures along ridgelines and steep slopes;
- Incorporates design and screening measures to minimize the visibility of structures and grated areas;
- Maintains the character and visual quality of the area." (Placer County General Plan, p. 39)."

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By their very nature, gondolas and ski lifts must extend along steep slopes to achieve their purpose. Given that the gondola is intended to connect the two ski resorts, all three action alternatives must also cross over the ridgeline which separates the two valleys. As such, it is not possible for the gondola to avoid slopes and ridgelines, but rather the design must rely on other means to screen and minimize the visible impacts of the infrastructure. Specifically the design of each alignment takes advantage of existing topography and vegetation to shield views as well as incorporates design standards via RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3. It is acknowledged that the Alternative 2 alignment would traverse a lengthy distances of the sparsely vegetated ridgeline, whereas Alternatives 3 and 4 cross over the ridgeline in one discrete location before diving down into Catch Valley, thus limiting the visible impacts of the Alternatives 3 and 4 gondola infrastructure to a greater extent than under Alternative 2. With these design measures in place, all three gondola alignments achieve consistency with the goals and policies of Policy 1.K.1.

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of direct and indirect impacts where the DEIS/R states that none of the action alternatives would cause inconsistencies with relevant federal, state, or local regulations and impacts to scenic vistas (p. 4.2-46).

Visual Quality Objectives:

0144-17

NEPA indicators related to Visual Quality Objectives (VQOs) include: “*Compliance with Forest Plan standards and guidelines for visual resources within the SUP area and from established viewpoints by meeting Visual Quality Objectives (Impact 4.2-1)*” (p. 4.2-20). Alternative 2 will result in unmitigatable impacts to VQOs:

- While impacts to VQO (“Preservation”) from within the GCWA are noted, the DEIS/R appears to dismiss further discussion of this impact by saying no components of the project are located within the WA lands, and ¹² that there is no policy precluding development from being visible to recreationists from federal wilderness areas.¹³

Whether a policy would allow it, from an environmental impact perspective, Alternative 2 introduces new infrastructure that will be extremely visible from the area assigned the VQO of “Preservation,” and therefore this must be disclosed as an adverse impact under NEPA which cannot be mitigated.

0144-18

- The DEIS/R notes Alternative 2 would comply with the “Partial Retention VQO” applicable to the Alpine Meadows mid-station.¹⁴ Part of this conclusion is based on the statement that the gondola will remain “visually subordinate to the visible characteristic landscape” due to coloring and tree screening.¹⁵ However, a comparison of the visual simulation of Alternative 2 from a viewpoint at Barstool Lake shows a significant impact from the mid-station:

¹² “While Alternative 2 may be visible from viewpoints within the National Forest System-GCW, which has been assigned a VQO of *Preservation*, no project components would be located on these lands.” (p. 4.2-23)

¹³ “[T]here is no legislation or policy that precludes development from being visible to recreationists from within federal wilderness areas. (Refer to Section 4.3, “Wilderness,” for more information.)” (p. 4.2-24)

¹⁴ “The *Partial Retention* VQO is applicable at the Alpine Meadows mid-station, and allows for the introduction of form, line, color, or texture which are not found at all in the characteristic landscape if these elements remain subordinate to the visual strength of the characteristic landscape. Chairlifts that resemble the proposed gondola are already present in this area. While Alternative 2 would constitute an incremental addition to the built environment in this area, the presence of gondola infrastructure and Gazex facilities would not dominate the characteristic landscape. Alternative 2 would be compliant with the *Partial Retention* VQO designated for upslope facilities at Alpine Meadows.” (p. 4.2-23)

¹⁵ In contrast to View 11, within View 15, presence of the proposed Alpine Meadows mid-station would be particularly noticeable in the foreground, just beyond Barstool Lake, and would represent a considerable contrast with the existing condition; in its existing condition, View 15 appears very natural, and ski area infrastructure is only slightly evident, if at all. However, the dark green color of the Alpine Meadows mid-station and the screening trees between potential viewers and the mid-station would contribute to the structure remaining visually subordinate to the visible characteristic landscape. 4.2-28

0144-16 cont'd, Visual Resources (VR)

0144-17, Visual Resources (VR)

As stated by the commenter, Section 4.2, “Visual Resources” of the Final EIS/EIR discloses that gondola infrastructure may be visible from lands with a designated VQO of *Preservation*. In particular, analysis provided under Impact 4.2-1 (Alt. 2) states: “While Alternative 2 may be visible from viewpoints within the National Forest System-GCW, which has been assigned a VQO of *Preservation*, no project components would be located on these lands.”

The commenter also reiterates another conclusion of the Final EIS/EIR, which is that although gondola infrastructure would be visible from lands with a designated VQO of *Preservation* under Alternative 2, no legislation or policy precludes development from being visible to recreationists from within federal wilderness areas (or, in this case, from lands with a designated VQO of *Preservation*).

The Wilderness Act of 1964 states that no development may occur within federally designated and owned wilderness areas (which normally have a designated VQO of *Preservation*). None of the action alternatives would result in development on lands with a designated VQO of *Preservation*; as such, stating that this would be an adverse impact would not be accurate, because there would be no inconsistency with the Wilderness Act of 1964 or the Forest Plan (which establishes VQO designations for Tahoe National Forest lands). As it relates to gondola infrastructure being visible from the National Forest System-GCW, the commenter correctly states (as summarized above) that there is no legislation or policy that prevents development from being visible from federal wilderness areas. Although the gondola infrastructure would be visible for recreationists within the National Forest System-GCW, this does not result in a conflict with legislation or policy.

0144-18, Visual Resources (VR)

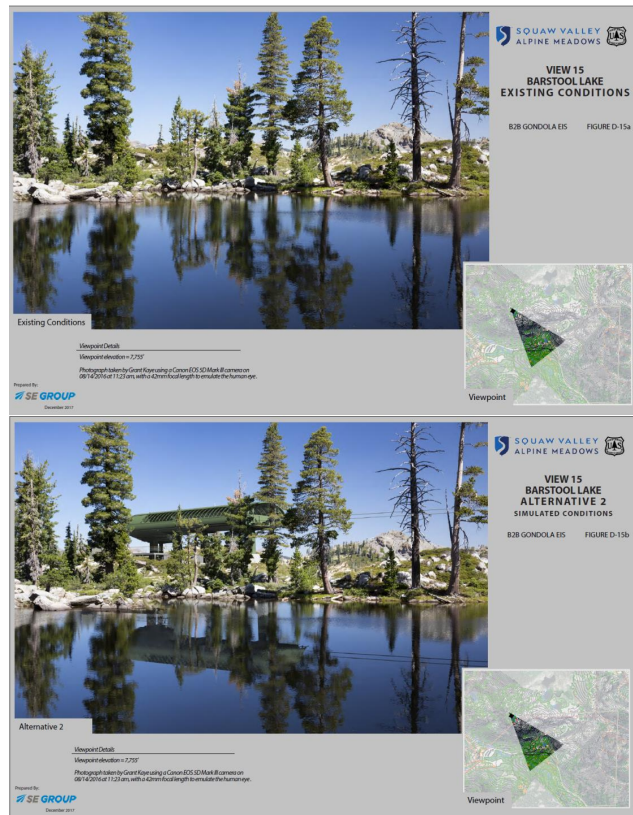
The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter’s opinions regarding the merits or qualities of the

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project into consideration when making a decision regarding the project.

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The FEIS/R must be corrected to reflect the project will not meet the Partial Retention VQO and this is therefore an adverse impact under NEPA which cannot be mitigated.

Viewpoint 13 impacts:

0144-19

Viewpoint 13 represents a location along the Five Lakes Trail at the Wilderness Boundary. Existing conditions include “no development whatsoever is visible from this viewpoint,” and that viewers at this location would mostly be hikers, who have a “high sensitivity toward the natural appearing and undeveloped landscape visible from this viewpoint.”¹⁶ The visual simulations appear to suggest no

¹⁶ “The Five Lakes Trail Wilderness Boundary 2 viewpoint looks east toward the Caldwell property from the ridge that separates the Caldwell property and the National Forest System-GCW (see Figure D-13a). In the foreground,

0144-18 cont'd, Visual Resources (VR)

0144-19, Visual Resources (VR)

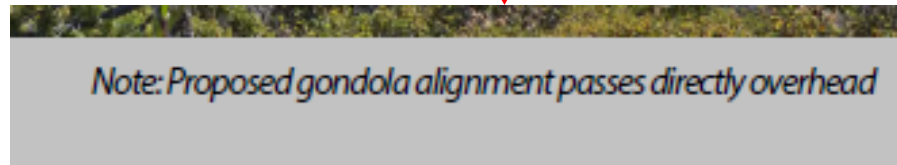
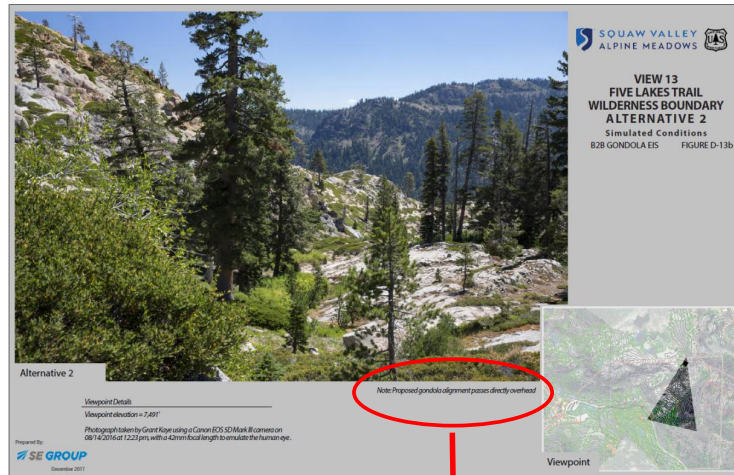
View 13 was selected for viewpoint analysis because most viewers from this location would be hikers using the Five Lakes Trail to access the National Forest System-GCW. It was identified after the creation of the visual simulations that although the gondola alignment shown in the inset on the bottom right-hand side of this figure appears to overlap with the viewer, gondola infrastructure does not appear in this visual simulation because the gondola would pass directly overhead (hence the inclusion of the note below the image).

View 13 remains appropriate for inclusion in this viewpoint analysis because of the useful perspective it provides for both Alternatives 3 and 4. While View 13 does not depict gondola infrastructure for Alternative 2, the note below the image discloses the issue identified by the commenter; as such, this issue does not warrant the creation of a new visual simulation.

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impact to this viewpoint by Alternative 2, however noted in a small font below the seemingly 'unaffected' viewpoint is the statement that the gondola would pass directly overhead. This raises questions about the appropriateness of this viewpoint. Further, the simulated view may mislead readers by failing to project the visual impacts of a gondola overhead.



The FEIS/R should include a simulation with either a different viewpoint and/or the inclusion of a simulation of what a hiker would see looking up from this viewpoint.

viewers can see large pine trees, scattered vegetation, and some exposed granite visible all over the hillside. No development whatsoever is visible from this viewpoint. Most of the viewers at this location would be hikers heading into the National Forest System-GCW, and duration of their view would likely last several minutes, depending on hikers' ascent speed; these hikers generally have a high sensitivity toward the natural appearing and undeveloped landscape visible from this viewpoint." (p. 4.2-6)

0144-19 cont'd, Visual Resources (VR)

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Wilderness (Section 4.3):

0144-20

Wilderness impacts are summarized in the DEIS/R as follows:

4.3 Wilderness					
Impact 4.3-1: Effects on Untrammeled Wilderness	Alts 1, 2, 3, 4 = NE	N/A	No mitigation measures are required	Alts 1, 2, 3, 4 = NE	N/A
Impact 4.3-2: Effects on Undeveloped Wilderness	Alts 1, 2, 3, 4 = NE	N/A	No mitigation measures are required	Alts 1, 2, 3, 4 = NE	N/A
Impact 4.3-3: Effects on Natural Wilderness	Alts 1, 2, 3, 4 = NE	N/A	No mitigation measures are required	Alts 1, 2, 3, 4 = NE	N/A
Impact 4.3-4: Effects on Opportunities for Solitude or Primitive and Unconfined Recreation	Alt 1 = NE Alt 2 = Adv Alts 3, 4 = Minorly Adv	N/A	Alt 1 = No mitigation measures are required Alts 2, 3, 4 = RPIs SCE-1 and SCE-2	Alt 1 = NE Alts 2, 3, 4 = Mitigated	N/A
Impact 4.3-5: Effects on Potential Wilderness Characteristics on Private Lands within the Congressionally Mapped Granite Chief Wilderness	Alts 1, 3, 4 = NE Alt 2 = Adv	N/A	No mitigation measures are required	Alts 1, 3, 4 = NE Alt 2 = Adv	N/A

However, as reflected in detailed comments following the list below, there are problems with the DEIS/R that do not support these conclusions. Based on information provided in the DEIS/R (or a lack of such information):

- NEPA: Alternative 2 impact to Impact 4.3-3 should be Significant and Unavoidable;
- NEPA: Alternative 2 impact to Impact 4.3-4 should be Significant and Unavoidable; and
- NEPA: Alternatives 3 and 4 impacts to Impact 4.3-4 should be minorly adverse.

The DEIS/R explains that CEQA does not apply to this resource section because the Wilderness Area is federally-designated, however “wilderness values and relevant policies” are incorporated into the visual resources and land use impact analyses for both NEPA and CEQA.¹⁷ As noted in our comments, there are several technical inadequacies with these other sections which also impact wilderness values.

All action alternatives:Subjectivity of Wilderness experience:

0144-21

The DEIS/R explains the difficulty of analyzing wilderness impacts given the subjectivity of wilderness experiences.¹⁸ While there is some level of subjectivity involved, the DEIS/R’s discussion of subjectivity appears to downplay Wilderness values and ignore the national significance of the area’s unique natural resources. The project is located adjacent to the Lake Tahoe basin, an area designated by Congress to be an area of spectacular beauty and a treasure of the US. The Lake and its surroundings must be treated as a national treasure and as an area of unmatched beauty that retains its natural resource values and wilderness. Further, portions of the project area are within the GCWA boundary. The DEIS/R should utilize the most protective interpretation, which in this case

¹⁷ “Analysis of wilderness impacts as provided below is not necessary to satisfy the requirements of CEQA because wilderness areas are federally designated. Analysis therefore falls under the scope of NEPA, not CEQA. However, Section 4.2, “Visual Resources,” incorporates wilderness values and relevant policies into the impact analysis for both NEPA and CEQA, and Section 4.4, “Land Use,” contains an evaluation of consistency with Forest Service policies related to wilderness for both NEPA and CEQA.” (p. 4.3-1)

¹⁸ “Although the wilderness characteristics detailed above offer well-defined standards for analyzing impacts on the wilderness experience of users in the National Forest System-GCW, wilderness experience is intrinsically subjective and intangible. Wilderness experience impacts considered substantial to one individual may be considered trivial to another. This is important to note because the analysis of direct and indirect environmental consequences that follows is limited by the subjective nature of the wilderness experience.” (p. 4.3-7)

0144-20, Wilderness (W2)

Section 4.3, “Wilderness” provides analysis specific to federal policy as it pertains to wilderness designation. As stated on pages 4.3-6 and 4.3-7, no state or local laws or regulations addressing federal wilderness designation exist that are relevant to this analysis. Wilderness values and relevant policies were incorporated into the visual resources and land use impacts analyses because the scope of analysis for those resources includes the National Forest System-GCW. Those resource sections discuss both NEPA and CEQA because there are existing state and county laws or regulations that are relevant for those analyses.

The remainder of the comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, no further response is warranted.

0144-21, Wilderness (W2)

The explanation in Section 4.3.1.1 stating that analysis of wilderness impacts is limited by the intrinsically subjective nature of the wilderness experience was included as a note that considerable qualitative analysis would be necessary to provide adequate analysis of impacts. The subjectivity of wilderness experience did not cause the importance of wilderness characteristics to be lessened in this analysis, nor did it cause the national significance of the National Forest System GCW’s unique natural resources to be ignored. Furthermore, analysis of impacts that would occur to wilderness characteristics as defined, in conjunction with a broader analysis of experiential impacts that would occur for visitors, allowed for the inclusion of both quantitative and qualitative analysis in Section 4.3. Discussion provided in Section 4.3 utilizes the most protective interpretation in its analysis of impacts.

Discussion of the broader area’s natural resources, including Lake Tahoe, are beyond the scope of the analysis for Section 4.3, “Wilderness.” This section specifically focuses on potential impacts of the action alternatives to the National Forest System-GCW.

It is also important to note that no components of the project are located within the boundary of the National Forest System-GCW. While elements of the project would occur on private lands within the congressionally mapped GCW, the land use

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restrictions established by the Wilderness Act of 1964 do not apply to private lands. Please refer to Section 4.3.1.2 for detailed discussion on this matter.

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cont'd

would generally be hikers looking for a wilderness experience that are sensitive to additional noise, infrastructure, and other disturbances.

All impact analyses should involve the most conservative analysis that addresses impacts to the most sensitive users. Additional discussion of the significance of the area's natural resources, including but not limited to its adjacency to Lake Tahoe, and the impacts of the gondola on wilderness experiences, should be adequately disclosed in the FEIS/R.

Increased access to GCWA and Tahoe National Forest:

0144-22

The DEIS/R states operation of the gondola will occur during the winter season and so long as both Alpine Meadows and Squaw Valley are open.¹⁹ While the document suggests this may be around April 15th, no assurances are provided. The Alpine Meadows and Squaw Valley mid-stations in Alternative 2 would provide additional access to the GCWA and TNF and thus, additional visitation may result.²⁰ Alternative 2 includes mitigation preventing access after April 15th to protect important Sierra Nevada Yellow-legged frog habitat at Barstool Lake.²¹ However, the Squaw Valley mid-station in Alternatives 2 and 3 may still provide additional access to the GCWA. The DEIS/R does not attempt to quantify the level of increased use that may result from each action alternative yet the alternatives do not include restrictions to prevent this increased use.

To ensure impacts from increased use are avoided, all action alternatives must prohibit passengers from disembarking at both mid-stations from April 15 to October 31 (even if the gondola is operational during this time period). A prohibition on travel outside of the ski area boundary from the Squaw Valley mid-station is another mitigation option that should be considered.

Cumulative Effects:

0144-23

In the Cumulative Effects section, the analysis reflects no increase in use from the Alpine Sierra subdivision (p. 4.3-19), however it will bring more people to the area who are likely to use the trail,

¹⁹ "The proposed gondola would transport guests in both directions during the winter season only, providing a ready transportation connection between the two ski areas. For the purposes of this project, the winter/ski season is defined as the period when both Squaw Valley and Alpine Meadows are in operation for winter sports (based on past operations, Alpine Meadows, on average, closes on approximately April 16). The gondola connection between Alpine Meadows and Squaw Valley would not be operational beyond this date unless both resorts are open for the skiing and snowboarding public." (p. 2-13)

²⁰ "[T]he Squaw Valley and Alpine Meadows mid-stations would improve access to the National Forest System-GCW during the winter, transitional seasons, and periods of inconsistent snow cover. This is because gondola-users would have the potential to disembark at the mid-stations and enter the National Forest System-GCW. This impact would be minimal during the winter as the National Forest System-GCW experiences limited use for backcountry skiing and snowboarding as compared to the summer. However, during the transitional seasons and periods of inconsistent snow cover, it is possible that Alpine Meadows would still be open for public skiing and snowboarding and the gondola would be operational, and that at the same time southern aspect slopes would be dry enough for hikers to use the National Forest System-GCW for day-trips or backpacking. During these parts of the year when the gondola would continue to operate, and southern aspect slopes would be dry enough for hiking at the same time, the Squaw Valley and Alpine Meadows mid-stations would provide additional access points to the National Forest System-GCW. This improved access could increase the likelihood of visitor encounters within the National Forest System-GCW, thereby reducing opportunities for solitude and primitive and unconfined recreation." (p. 4.3-12)

²¹ "MUL-4: For Alternative 2, the Alpine Meadows mid-station may be open to skier entry/exit through April 15th only, to minimize the potential for adverse effects on Sierra Nevada yellow-legged frog at Barstool Lake."

0144-21 cont'd, Wilderness (W2)

0144-22, Wilderness (W2)

Impact 4.3-4 in Section 4.3, "Wilderness" includes analysis related to the potential for the gondola mid-stations to improve access to the National Forest System-GCW. The exact increase in visitation to the National Forest System-GCW resulting from the presence of these mid-stations was not quantified in the Draft EIS/EIR because this increase cannot be precisely measured.

However, RPM REC-4 would minimize impacts associated with improved access to and increased visitation within the National Forest System-GCW. RPM REC-4 states "Signage will be posted at both the Squaw Valley and Alpine Meadows base terminals and mid-stations stating that walking or hiking trail access directly from the gondola (i.e., by exiting at a mid-station) is strictly prohibited. The applicant will not permit foot traffic to exit at the Squaw Valley mid-station, or the Alpine Meadows mid-station under Alternative 2."

It is also important to note that under Alternative 3 and 4, the Alpine Meadows mid-station would be located further to the east (away from the National Forest System-GCW) as compared to Alternative 2; as such, the Alpine Meadows mid-station under Alternatives 3 and 4 would not potentially improve access to the National Forest System-GCW, as it would under Alternative 2.

0144-23, Wilderness (W2)

In the Final EIS/EIR, the Cumulative Effects section of Section 4.3, "Wilderness" has been amended to include mention of increased use of the National Forest System-GCW that may occur as a result of the Alpine Sierra Subdivision (please refer to pages 4.3-23 through 4.3-25 of the Final EIS/EIR).

Specific regulatory changes that may occur in the future to the Tahoe National Forest Land and Resource Management Plan and Sierra Nevada Forest Plan Amendment were not included on page 4.3-19 because they are not yet known and are therefore not reasonably foreseeable. Impacts analysis throughout the Draft EIS/EIR incorporates the latest regulatory direction provided by the Sierra Nevada Forest Plan Amendment (2004).

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therefore the cumulative impacts related to *Impact 4.3-3: Natural Wilderness* and *Impact 4.3-4: Opportunities for Solitude of Primitive and Unconfined Recreation* must be noted. In addition, the Cumulative Effects section includes impacts associated with “regulatory changes” to the Tahoe National Forest Land and Resource Management Plan and Sierra Nevada Forest Plan Amendment (p. 4.3-19), however there is no discussion of what the regulatory changes may be.

The cumulative impacts regarding increased use of the GCWA and regulatory changes to the Tahoe National Forest Land and Resource Management Plan and Sierra Nevada Forest Plan Amendment must be addressed in the FEIS/R.

Alternative 2:

Impacts to Natural Wilderness:

0144-24

The DEIS/R concludes no impacts to natural wilderness (Impact 4.3-3) because it would not “introduce any of the effects of modern civilization” on the lands, and the “*natural quality of these lands would not be reduced.*” However, the visual and noise impacts of the gondola would no doubt reduce the natural quality and bring more presence of modern civilization. Alternatives 2 and 3 will also bring more people into the GCWA.

The FEIS/R must clarify and/or revise this conclusion.

Impacts on Potential Wilderness Characteristics on Private Lands within the Congressionally-mapped Granite Chief Wilderness:

0144-25

There is an adverse impact regarding Impact 4.3-5: Effects on Potential Wilderness Characteristics on Private Lands within the Congressionally-mapped Granite Chief Wilderness. As noted by the DEIS/R,²² the USFS cannot restrict development on the subject privately-owned lands nor employ buffer zones around Wilderness Areas, yet it is reasonably foreseeable that if development on this land is allowed, the land will no longer possess wilderness characteristics and will become permanently ineligible for addition to the GCWA. This result runs contrary to the current USFS direction to “[*acquire*] private inholdings as the opportunities arise.”²³

The FEIS/R must clearly disclose this permanent impact.

²² “The Wilderness Act of 1964 itself does not explicitly prohibit the establishment of buffer zones around wilderness areas; however, many subsequent wilderness bills do. The first explicit mention of the prohibition of buffer zones around wilderness areas came in a 1980 public law (Public Law 96-550, Section 105), which states: Congress does not intend that the designation of wilderness areas... lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that non-wilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.” (p. 4.3-5)

²³ “Resource management emphasis for Management Area 080 mostly centers on adhering to the land use restrictions established in the Wilderness Act of 1964. Additionally, part of this section suggests “[*acquisition of*] private inholdings as the opportunities arise” (U.S. Forest Service 1990b).” (p. 4.3-6)

0144-23 cont'd, Wilderness (W2)

0144-24, Wilderness (W2)

Analysis in the Final EIS/EIR has been revised to include a minorly adverse impact under NEPA for Impact 4.3-3 under all action alternatives. This determination was based on the anticipated direct and indirect effects to occupied SNYLF habitat (as well as to unoccupied designated critical habitat) within the National Forest System-GCW, which would alter the wilderness ecological processes occurring within the National Forest System-GCW to some degree. For further information, please refer to Impact 4.3-3: Effects on Natural Wilderness for all alternatives in the Final EIS/EIR.

0144-25, Wilderness (W2)

The analysis provided under Impact 4.3-5 does not state that implementation of Alternative 2 would cause the Caldwell Property to be permanently ineligible for inclusion as part of the National Forest System-GCW because this would not be accurate. The potential wilderness characteristics of the Caldwell Property would be adversely impacted by implementation of Alternative 2, as stated under Impact 4.3-5, but removal of infrastructure and rehabilitation of the land could occur in the future to restore potential wilderness characteristics, if the Forest Service ever acquired the Caldwell Property.

While the California Wilderness Act of 1984 did provide direction for the U.S. Forest Service to “enter into negotiations to acquire by exchange all or part of any privately owned lands within the national forest wilderness areas designated by this title,” the Caldwell property owners have not in the past (nor are they currently) interested in conveying this property to the United States. The future acquisition of this property by the U.S. Forest Service, and its possible inclusion into the National Forest System Granite Chief Wilderness, is beyond the scope of this decision.

While the development of private lands may negatively impact potential wilderness characteristics, those same impacts may not necessarily be permanent nor preclude future inclusion into a National Forest System Wilderness Area if such private lands are acquired by the U.S. Forest Service in the future. In 2017, for example, private lands on the western border of the

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National Forest System-GCW that previously contained roads and structures were acquired by the U.S. Forest Service and are now included within the National Forest System Granite Chief Wilderness.

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Alternatives 2 and 3:Effects on Opportunities for Solitude or Primitive and Unconfined Recreation

The DEIS/R concludes there will be “adverse” and “minimally adverse” impacts (Alternative 2 and 3, resp.) to Opportunities for Solitude or Primitive and Unconfined Recreation because more visitors can access the GCWA by unloading at the Alpine Meadows and Squaw Valley mid-stations,²⁴ but claims this impact will be mitigated with RPMs SCE-1 and SCE-2.²⁵ However, the mitigation measures (SCE-1 and -2) are only related to visual measures (e.g. color, design); these measures do nothing to mitigate impacts on solitude or primitive and unconfined recreation from increased visitation and evidence to base this conclusion on has not been provided.

The FEIS/R must reflect this impact as “adverse” unless additional mitigation can be identified and shown to mitigate this impact. Prohibitions on disembarking at the gondola’s mid-stations may provide mitigation for impacts associated with increased visitation. (Note this would not mitigate the impacts related to other aspects of the wilderness experience, including visual and noise impacts as discussed above).

Other NEPA/CEQA Sections, including Growth-Inducing (Section 5):**All action alternatives:**Permanent commitment of resources:

For all alternatives, the DEIS/R concludes no permanent commitment of resources under both NEPA and CEQA because the infrastructure could be removed and restored in the future,²⁶ however this conclusion ignores that development of the gondola will logically preclude the land from consideration for purchase by the public for inclusion in the Congressionally-designated GCWA boundary, as noted previously, and all action alternatives may result in growth-inducement with regards to the proposed White Wolf Subdivision which would result in a permanent commitment of resources for the subdivision.

The FEIS/R must accurately reflect the Adverse (NEPA) and Significant (CEQA) commitment of resources associated with the action alternatives.

²⁴ “During these parts of the year when the gondola would continue to operate, and southern aspect slopes would be dry enough for hiking at the same time, the Squaw Valley and Alpine Meadows mid-stations would provide additional access points to the National Forest System-GCW. This improved access could increase the likelihood of visitor encounters within the National Forest System-GCW, thereby reducing opportunities for solitude and primitive and unconfined recreation.” (p. 4.3-12)

²⁵ “Alternative 2 would result in the construction of gondola infrastructure that would be visible from certain locations within the National Forest System-GCW. The construction phase would also generate noise that would be audible from certain locations within the National Forest System-GCW. Depending on the perception of individual users, this development could negatively affect the sense of solitude and reduce opportunities for primitive and unconfined recreation for these users. Under NEPA, and considering the NEPA indicators, absent RPMs and/or mitigation, direct and indirect effects related to opportunities for solitude or primitive and unconfined recreation would be adverse. Implementation of RPMs SCE-1 and SCE-2 would mitigate these effects.” (p. 4.3-11)

²⁶ “In addition, the footprint of the gondola would be small, and the gondola could be abandoned and the site restored in the future. Implementing the project would not obligate future generations to retain project facilities in their current location or configuration if a compelling reason to alter the facilities were to arise.” (p. 5-3)

0144-26, Wilderness (W2)

In addition to the increase in visitation that may occur as a result of the mid-stations, the impacts determinations of “adverse” and “minimally adverse” for Impact 4.3-4 under Alternatives 2 and 3, respectively, incorporate the consideration that additional infrastructure would be visible from within the National Forest System-GCW, which could negatively affect sense of solitude and/or reduce opportunities for primitive and unconfined recreation for some individuals. RPMs SCE-1 and SCE-2 were included in the impact summary for Impact 4.3-4 because they would minimize visual impacts resulting from implementation of the action alternatives, not because they would reduce impacts associated with increased visitation to the National Forest System-GCW.

In the Final EIS/EIR, RPM REC-4 has been added to the list of RPMs included in the impact summary for Impact 4.3-4, which would reduce impacts associated with increased visitation to the National Forest System-GCW. RPM REC-4 states that “Signage will be posted at both the Squaw Valley and Alpine Meadows base terminals and mid-stations stating that walking or hiking trail access directly from the gondola (i.e., by exiting at a mid-station) is strictly prohibited. The applicant will not permit foot traffic to exit at the Squaw Valley mid-station, or the Alpine Meadows mid-station under Alternative 2.”

0144-27, Other NEPA/CEQA Analysis (ONCA)

Section 5.1.2, “Irreversible and Irrecoverable Commitments of Resources,” of the Draft EIS/EIR accurately characterizes the permanent loss of resources that would be expected to result from project implementation. As described in Section 4.3, “Wilderness,” the project area is adjacent to but not within the GCW. Indirect effects on its wilderness character and wilderness users are described therein, but no direct effects would occur on NFS lands within the GCW (see page 4.3-1). Future purchase of the project area for inclusion in the GCW is not considered in the Draft EIS/EIR because it is speculative. The White Wolf Development, though considered in the Draft EIS/EIR as part of the cumulative effects analysis, is not part of the project. Therefore, neither of these were, nor should they have been, considered as part of the project’s irreversible and irretrievable commitments of resources.

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Opening an undeveloped area to development and expanding public services:

The DEIS/R concludes the action alternatives are not growth-inducing because the gondola will not “open an undeveloped area to development...[or] expand public services or utilities into an area not previously served.”²⁷ As stated in FOWS NOP comments, the DEIS/R must take into account the proposed White Wolf Subdivision and Roller Lift projects. For example, the proposed gondola would add a permanent access road (Alternatives 3 and 4), which would encourage development in that area. Further, the gondola would provide access to the proposed Roller Lift (Alternative 2), while the White Wolf Subdivision aims to connect to the gondola for use by the future private owners of the proposed subdivision.

The FEIS/R must accurately reflect the project’s potential to induce growth. A visual representation of these three projects combined into the same image should be included.

Alternative 2:Growth-inducing impacts with Rollers Lift:

Alternative 2’s proposed Alpine Meadows mid-station would provide access to the Rollers Lift,²⁸ which would be more likely to result in construction of the lift.

The FEIS/R must analyze the growth-inducing impacts related to the Rollers Lift.

Alternatives 3 and 4:New permanent access road:

Alternatives 3 and 4 would require a new permanent access road on Caldwell’s property, which may make the proposed White Wolf Subdivision project more likely (p. 2-27).

This impact must be clearly disclosed in the discussion of growth-inducing impacts.

Inconsistency regarding new access road:

There appears to be an error in the DEIS/R. On page 2-16, the text does not say a new access road is required for Alternative 3, however Exhibits 2-9 and 2-13 show the same construction access route

²⁷ “[T]he project would not open an undeveloped area to development, change land use designations, or expand public services or utilities to an area not previously served. Therefore, the increase in seasonal visitors would not remove obstacles to growth, and the project would not be growth-inducing.” (p. 5-13)

²⁸ “The proposed Alpine Meadows mid-station would provide access to the master planned Rollers lift (included in the Alpine Meadows MDP). The bottom terminal of the Rollers lift would be located near the Alpine Meadows mid-station (on private land) and it is anticipated that skiers could exit the gondola at the midstation to access this future lift and the terrain it would serve. The proposed gondola, in combination with the Rollers lift, would result in increased use of the terrain below the top terminal of the Rollers Lift (Beaver and Estelle bowls). The increased use surrounding the Alpine Meadows mid-station and Rollers lift area would result in noise and visible infrastructure adjacent to the National Forest System-GCW, which are further evaluated in Sections 4.2, “Visual Resources”; 4.3, “Wilderness”; and 4.9, “Noise.” (p. 4.1-24)

0144-28, Other NEPA/CEQA Analysis (ONCA)

Implementation of Alternatives 3 or 4 would not include the construction of a new permanent access road. There is current road access to the Alpine Meadows mid-station under Alternatives 3 and 4, so no new road would be necessary. The construction access route shown in the Chapter 2 exhibits of the Draft EIS/EIR would be for construction work along the gondola line and includes work such as excavating foundations for the gondola towers, tree removal, etc. This point has been clarified throughout Chapter 2 of the Final EIS/EIR.

The presence of this road is specific to the gondola construction and maintenance and does not suggest that the White Wolf development or other development in the area would be more likely to occur. As stated in the Draft EIS/EIR, implementation of the White Wolf development does not depend on approval of the Base-to-Base Gondola project, and vice versa. Each of these projects could be implemented individually (i.e., without implementation of the other one) and still serve its own individual purpose.

The Rollers lift is a planned, but unpermitted and unimplemented, chairlift (included but not proposed at this time within the Alpine Meadows Master Development Plan). Its bottom terminal would be near the Alpine Meadows mid-station under Alternative 2 (meaning that under Alternative 2, skiers could exit the gondola at the Alpine Meadows mid-station and ski/walk to the Rollers lift). The Rollers lift is included in the Draft EIS/EIR’s list of cumulative projects (see Table 3-3 and Exhibit 3-1; see Alpine Meadows Master Development Plan, map label 1). Apart from the map reference to the Alpine Meadows Master Development Plan, the Rollers lift is not specifically shown on Exhibit 3-1; however, it is shown on Figure 8 in the Alpine Meadows Master Development Plan, as is the Alternative 2 alignment for the gondola (Tahoe National Forest 2015). The Draft EIS/EIR discusses the Rollers lift in the cumulative analysis in Section 4.1, “Recreation,” because construction of the Rollers lift, in conjunction with implementation of Alternative 2, could increase use of the terrain served by the Roller lift (Beaver and Estelle Bowls).

Because both the White Wolf development and Rollers lift were identified as cumulative projects (see Table 3-3 and Exhibit 3-1 in the Draft EIS/EIR), they are properly considered in the cumulative analysis (see Sections 4.1 through 4.17 in the Draft EIS/EIR) rather than being considered in the growth-inducing impacts analysis.

0144**0144-29, Other NEPA/CEQA Analysis (ONCA)**

See response to comment 0144-28, above, for a discussion of the Rollers lift and how it was considered in the Draft EIS/EIR analysis (in the cumulative rather than the growth-inducing effects analysis).

0144-30, Other NEPA/CEQA Analysis (ONCA)

Implementation of Alternatives 3 or 4 would not include the construction of a new permanent access road. There is current road access to the Alpine Meadows mid-station under Alternatives 3 and 4, so no new road would be necessary. The construction access route shown in the Chapter 2 exhibits of the Draft EIS/EIR would be for construction work along the line, like excavating foundations for the gondola towers, tree removal, etc. This point has been clarified throughout Chapter 2 of the Final EIS/EIR.

For a discussion of how the White Wolf development was considered in the Draft EIS/EIR analysis (in the cumulative rather than the growth-inducing effects analysis), please refer to the response provided for comment 0144-28, above.

0144-31, Project Description (PD)

Implementation of Alternative 3 (or 4) would not include the construction of a new permanent access road. There is current road access to the Alpine Meadows mid-station under Alternatives 3 and 4, so no new road would be necessary. The construction access route shown in the Chapter 2 exhibits of the Draft EIS/EIR would be for construction work along the line, such as excavating foundations for the gondola towers, tree removal, etc. This point has been clarified throughout Chapter 2 of the Final EIS/EIR.

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around the Alpine Meadows mid-station as depicted for Alternative 4 (for which the text discloses a new permanent access road on Caldwell's property will be needed²⁹).

The FEIS/R must clarify whether Alternative 3 will require a new permanent access road, or the Exhibit 2-9 must be corrected. Where a new access road will be permanent, this should be clearly stated on the Exhibits.

Transportation Impacts (Section 4.7):

All Action Alternatives:

0144-32

VMT in the Tahoe Basin:

There are several aspects of the analysis with regards to impacts to the Tahoe Basin which must be clarified and/or corrected:

- The DEIS/R includes an estimate of project-generated VMT within the Tahoe Basin, however there is no information documenting how these figures were arrived at.³⁰ For example, what roadway segments were counted, at what mileage, and what percentage of new trips in the Basin will utilize which roadway segments (e.g. SR 89 along the West Shore, SR 28 North of Tahoe City)?
- The DEIS/R states that trips within the Tahoe Basin are not "new" because "by definition, one end of each trip is associated with land uses within the TRPA boundary." However, as the proposed gondola will increase visitors to the Alpine Meadows/Squaw Valley Resorts (by 36,856 skier visits), and as the DEIS/R notes many of the resorts' visitors and employees drive to and/or live in the Tahoe Basin, the gondola will clearly generate "new" VMT within the Tahoe Basin.
- The DEIS/R notes that a significant percentage of traffic affecting Saturday morning peak hour congestion is coming from the Lake Tahoe Basin, with patterns indicative of visitors who arrived Friday evening (driving into the Tahoe Basin), and then drove to Alpine Meadows/Squaw Valley on Saturday.³¹ What percent of the anticipated increase of 36,856 skiers/year (and their vehicles) will involve visitors who come and stay in the Tahoe Basin, thereby increasing the demand for overnight accommodations in the Tahoe Basin? This information is not disclosed, nor is it clear whether the VMT from their arrivals in the Basin (typically on a Friday evening) has been accounted for in the analysis. This must be clarified and clearly disclosed in the FEIS/R.

²⁹ "Access to this site would require construction of a segment of new permanent road on the Caldwell property." (p. 2-27)

³⁰ "2. The portion of the project's VMT that would occur within the TRPA boundary was estimated. This is a particularly important metric for summer conditions and is listed as one of TRPA's environmental carrying capacities. Although a threshold value does not exist for winter daily conditions, the project's VMT within the TRPA boundary has nevertheless been estimated for readers interested in this value. The VMT is estimated to be 1,956 on a Saturday and 1,768 on a Sunday. By definition, one end of each trip is associated with land uses within the TRPA boundary, which means that this VMT is not "new" (i.e., not attributed to a traveler that would otherwise not be in the basin). Some of these trips could have also potentially been visiting other resorts had the proposed gondola not been in place." (p. 4.7-28)

³¹ "This suggests that a component of skier visits to these resorts is comprised of skiers who arrive at lodging in the Tahoe Basin on a weeknight (i.e., Thursday or Friday), ski/stay for the weekend, then return to their permanent residence on Sunday afternoon." (p. 4.7-5)

0144-31 cont'd, Project Description (PD)

0144-32, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment states that no information was provided regarding how the project's VMT estimates within the Tahoe Basin were calculated. Page 4.7-28 of the Draft EIS/EIR provide an in-depth discussion of the VMT estimation methods, including an explanation of how the estimated project related VMT is based on data from a 2012 LSC Transportation Consultants survey documenting the residential locations of day skiers and winter employees at Squaw Valley. Online skier survey responses (2015) were also used for in-bound and out-bound trip assumptions under existing plus project conditions. (See Draft EIS/EIR, pp. 4.7-22, 4.7-28; see also Tables 4.7-11 and 4.7-12.)

The detailed VMT calculations can be found on the last page of Section E2 of Appendix E (page 126 of Appendix E) to the Draft EIS/EIR (VMT Estimates under Plus Project Conditions) and these calculations support VMT data provided in Section E5, "Supplemental Tahoe Basin VMT Data" added to Appendix E in the Final EIS/EIR. The VMT estimates for the Tahoe Basin shown on the last page of Section E2 and in the added Section E5 of Appendix E, for example, reflect inbound and outbound Saturday trips to Squaw Valley from the Tahoe North Shore (28 percent) with a trip length of 11 miles, Tahoe West Shore (7 percent) with a trip length of 15 miles, as well as Tahoe South Shore (5 percent) with a trip length of 39 miles. Similar assumptions are reflected for Sunday VMT. Total Project-Related Net Change in VMT is shown in Table 4.7-14.

The comment asks what roadway segments were counted, at what mileages, and what percentages of trips. Please refer to the VMT calculations added to Appendix E of the Final EIS/EIR for this information, showing VMT in the Tahoe Basins was calculated for trips between the SR 89/Alpine Meadows Road intersection and the North Shore, South Shore, and West Shore of Lake Tahoe using the major roadways between those destinations (e.g., Highways 28 and 89). Those calculations show the number of assumed project-related additional daily trips on given roadways in the Tahoe Basin and length of those trips, which form the basis for tabulating VMT. The project, for example, was assumed to result in 1,956 VMT on a Saturday and 1,768 on a Sunday during the winter months from skiers traveling to/from the Tahoe basin. (See Draft EIS/EIR, p. 4.7-

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28.) This increase is considered to be less-than-significant to in-basin roadways and intersections, as demonstrated in the traffic impacts analysis in terms of level of service and delay.

The roadway segments considered included Highway 89 toward Truckee and at various intersections in Truckee (See Exhibit 4.7-6.)

The second bullet of the comment states that the gondola will clearly generate new VMT within the Tahoe Basin. This statement is consistent with the conclusions of the Draft EIS/EIR and, as identified above, the analysis found at page 4.7-28 of the Draft EIS/EIR which quantifies the expected increase in VMT from the Project from trips to/from areas within the nearby Tahoe Basin, including a discussion of whether that VMT is new or not. The Draft EIS/EIR explains, for example, that a portion of the additional skier visits resulting from the gondola may reasonably be assumed to be skiers diverted from other Tahoe area resorts, including ski resorts located within the Tahoe basin, who may find Squaw/Alpine more appealing because of the ability to ski both Squaw and Alpine in one day without having to travel by car or shuttle between the two resorts. (See p. 4.7-28.)

The comment then asks what percentage of annual added skiers will come and stay in the Tahoe Basin, thereby increasing demand for overnight accommodations. As described on page 4.7-25 of the Draft EIS/EIR, all trips generated by the gondola were conservatively assumed to be new day-use skiers versus trips made by skiers staying overnight nearby (i.e., in Olympic Valley). This assumption is also conservative because some skiers will be skiers who opt to ski Squaw/Alpine rather than other in-Basin ski resorts because of the gondola, thus displacing some in-basin trips rather than creating entirely new trips. Thus, in reality, some portion of the overall trips attributable to the gondola would occur whether or not the gondola were present. By assuming all new day-use skier trips, however, the Draft EIS/EIR is conservative in its assumptions.

Exhibit 4.7-4 [Distribution of New Skier Vehicle Trips to Squaw Valley Ski Resort] displays the expected distribution of trips to and from the Squaw Valley Ski Area associated with the proposed project. This figure indicates that 45 percent of inbound Saturday AM peak hour trips to the Squaw Valley Ski Area would originate from the south (i.e., likely having a trip origin in the Tahoe Basin). Similarly, 52 percent of Saturday AM peak hour trips to Alpine Meadows would originate from

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the south (See Exhibit 4.7-5). The result is an estimated 33 Saturday AM peak hour trips entering from the direction of the Tahoe Basin. Outbound Sunday PM Peak hour trips are estimated at 25 percent; consequently, roughly 20 percent of Sunday day-skiers, for example, may be assumed to live in the North and West Shore areas [45 percent inbound & 25 percent outbound] and thereby would not contribute to demand for accommodations in the North or West Shore of Lake Tahoe.

For those who do visit from other areas, there is no way of knowing how many of these trips would be associated with individuals who would have sought lodging in the area anyway to ski at another resort and decided to ski at Squaw Valley or Alpine Meadows because of the gondola, or might already own a second home in the area and decided to ski at either resort because of the gondola. There is no evidence offered by the comment demonstrating that the existing lodging accommodations available in Squaw Valley, Tahoe City and along the Westshore are unable to accommodate new visitors resulting from the project. It was, moreover, unnecessary for the traffic analysis to determine the extent to which new trips would increase demand for overnight accommodations. The issue of the potential for increased visitation to generate increased demand for goods and services is addressed in growth inducing impacts analysis in the Draft EIS/EIR Section 5.2.3.5, "Growth as a Result of Increased Resort Visitation."

The comment also asks whether VMT from the arrivals (e.g., on a Friday evening) has been accounted for in the analysis. A primary threshold used for evaluation of VMT is the TRPA carrying capacity expressed by the peak summer Friday condition. This carrying capacity metric is defined by a single day condition. Therefore, VMT in the Tahoe Basin for the traffic analysis is provided for single days, consisting of peak days for trip and VMT generation. Thus, the winter Saturday and Sunday VMT estimates presented in Table 4.7-14 of the Draft EIS/EIR do not consider travel associated with Friday evening arrivals. Overall travel (i.e., VMT) is greater on a Saturday than a weekday. Therefore, VMT generated on a Friday would not add to the understanding of single-day peak VMT generation, which is the metric of concern for the analysis.

The comment then states that the Final EIS/EIR should disclose the cumulative increases in the VMT within the Tahoe Basin associated with the proposed project, Village at Squaw Valley Specific Plan, and the Martis Valley West Specific Plan. Such an analysis would not add to the understanding of

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cumulative VMT conditions because, as stated above, the metric used for evaluating VMT in the Tahoe Basin is a one day, peak summer Friday. The Village at Squaw Valley Specific Plan and Martis Valley West Specific Plan EIRs both calculated VMT in the Tahoe Basin for this single peak summer Friday. The proposed Gondola project would not add VMT during a summer Friday; therefore, it would not add to any cumulative VMT condition identified for these two projects. For these two other projects, VMT generation in the Tahoe Basin for a peak winter weekend day was not calculated as the peak summer Friday is the metric of concern. Therefore, there is no available winter VMT calculation for these two other projects to add the Gondola VMT.

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0144-32
cont'd

- In addition, the FEIS/R should disclose the cumulative increases in VMT within the Tahoe Basin associated with the increased skier visits during the winter months from the proposed project, the Village at Squaw Valley Specific Plan, and the Martis Valley West Specific Plan.

The FEIS/R must be corrected to provide the methods used to develop the Tahoe VMT estimates and address these informational deficiencies. In addition, the FEIS/R should disclose the cumulative increases in VMT within the Tahoe Basin during the season of peak operation (winter).

Coordination with Shuttle operations:

0144-33

The DEIS/R states that when the gondola is functioning, the existing bus ski shuttle between the two resorts would not be in operation. We question whether this is a feasible assumption. There may be times when wind affects the gondola operations such that they may be turned on and off throughout the day; in this situation, how quickly will a shuttle be put into service or taken out of service as gondola operations change?

The FEIS/R must include detailed requirements that will ensure the shuttles do not operate while the gondola is in operation and/or include adequate mitigation for the additional traffic generated during times of overlapping operation.

Mitigation for transportation impacts:

0144-34

The DEIS/R discloses cumulative adverse (NEPA) and Significant and Unavoidable (CEQA) transportation impacts for all action alternatives and includes Mitigation Measure 4.7-11: Pursue Strategies to Reduce Vehicle Trips Generated during the Sunday PM Peak Hour on Peak Ski Days.³² However, this mitigation measure does no more than provide a list of existing or planned strategies. There are no identified performance measures that must be achieved, nor are all possible strategies to reduce transportation impacts employed even as the DEIS/R notes the cumulative impacts cannot be mitigated. Every available action must be implemented to reduce traffic where impacts are adverse/significant and unavoidable, including additional funding for transit service and fixed route service to Alpine Meadows (discussed further below).

Performance measures and additional mitigation for transportation impacts must be included in the FEIS/R in order to mitigate the impacts to the extent possible.

³² "Mitigation Measure 4.7-11 (Alternative 2): Pursue Strategies to Reduce Vehicle Trips Generated during the Sunday PM Peak Hour on Peak Ski Days

Prior to Improvement Plan approval, the applicant shall provide evidence to the Department of Public Works and Facilities of compliance with the Placer County Trip Reduction Ordinance, including a detailed accounting of Transportation Demand Management strategies currently provided for or planned by Squaw Valley. These strategies may include, but not be limited to, one or more of the following:

- ☐ operating a complementary and convenient shuttle between resorts and off-site park-and-ride lots (i.e., within Truckee or Tahoe City);
- ☐ implementing programs to better disperse the departures of skiers during peak afternoons, through entertainment options and other incentives; and
- ☐ joining/renewing membership in the Truckee North Tahoe Transportation Management Association." (p. 4.7-63).

0144-32 cont'd, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0144-33, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment states that there may be times when wind affects the gondola operations such that shuttles may be used on and off throughout the day. The comment suggests that detailed requirements are needed to ensure the shuttle does not operate while the gondola is in operation. It is acknowledged that windy conditions could temporarily cause the gondola to not operate and that such situations could consequently result in the need for Squaw Valley to transport skiers between the resorts via a shuttle bus. Those conditions, however, are considered to be atypical and would not correspond to the type of design day (i.e., between the fifth and 10th busiest day of the ski season) that was studied in the Draft EIS/EIR. Furthermore, page 4.7-17 specifies that a condition of approval would be placed on the project so that the shuttle would not operate when the gondola is functional.

0144-34, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The issues raised in this comment are addressed in the Master Response related to Vehicle Trip Reduction Measures provided in Section 1.8, "Master Responses" in this volume.

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Vehicle occupancy rates:

The DEIS/R estimates new vehicle trips using an occupancy of 3.2 passengers per vehicle based on a survey of 720 responses.³³ The Village at Squaw Valley Specific Plan DEIR (VSVSP DEIR) documented occupancy of 2.2 passengers/vehicle based on the observation of 1,859 skiers.³⁴ Given the higher sample size and the DEIS/R's statements to analyze conservatively,³⁵ the analysis should use the occupancy of 2.2 passengers per vehicle in the traffic analysis, as the higher occupancy rate may underestimate new vehicle impacts. For example, the below provides a rough comparison of the different outcomes (and potential underestimates):

Using the DEIS/R's occupancy rate of 3.2 passengers/vehicle and 90% private vehicle use,³⁶ the project would generate the following:

- In the first year after opening, an additional 12,400 skier visits would equate to 3,488 additional vehicles, and within five years, an additional 36,856 skier visits would equate to 10,366 additional vehicles.

Using the 2.2 rate along with the 90% private vehicle use, the project would generate the following:

- In the first year after opening, an additional 12,400 skier visits would equate to 5,072 additional vehicles, and within five years, an additional 36,856 skier visits would equate to 15,078 additional vehicles.

This results in an *underestimate* of 1,584 vehicles in the first year and 4,712 vehicles by year five. Underestimates in the transportation analysis also affect analyses of noise, air quality, water quality, public health and safety, and GHG emissions.

The FEIS/R must use the best available data associated with occupancy numbers in its calculations of transportation and associated impacts, and improved mitigations must be offered to address these increased impacts.

Fixed route transit to Alpine Meadows:

The DEIS/R states that fixed route public transit to Alpine Meadows is not currently available.³⁷ As there are numerous "Adverse" and "Significant and Unavoidable" impacts among the transportation indicators, all available mitigation measures should be included with the project.

As such, provision of fixed route service to Alpine Meadows should be examined as another mitigation measure in the FEIS/R.

³³ "2. Of 720 completed responses regarding average vehicle occupancy while traveling to each resort, the average was 3.2 persons per vehicle. Accordingly, this value is used in this study." (p. 4.7-20)

³⁴ "A total of 1,859 skiers/boarders were observed to arrive in 859 vehicles, for an average vehicle occupancy of 2.20 skiers/boarders per vehicle parked." (VSVSP DEIR, App G, Parking Demand Analysis, p. 13)

³⁵ "The analysis in this EIS/EIR employs the following reasonably conservative set of assumptions to ensure that the project's transportation impacts are not understated:" (p. 4.7-18)

³⁶ "[T]his study assumes 90 percent of new skiers arrive by private vehicle." (p. 4.7-20)

³⁷ "The project could enable skiers desiring to travel by transit to Alpine Meadows to access that resort by the TART bus that stops at Squaw Valley. Alpine Meadows is not currently accessible via fixed route transit." (p. 4.7-45)

0144-35, Transportation and Circulation/Traffic and Parking (T&C/T&P)

This comment suggests that the Draft EIS/EIR should have relied upon average vehicle occupancy (AVO) data from the *Village at Squaw Valley Specific Plan DEIR* versus more recent estimates due to its larger sample size and intent of the Draft EIS/EIR to conservatively analyze impacts. Page 4.7-20 describes the results of an online survey by LSC Transportation Consultants, which found an average vehicle occupancy of 3.2 persons per vehicle. That survey, published in April 2015, was based on a sample size of 720 completed responses by a variety of skier groups who had visited one or both resorts over the past three years. The comment suggests that this result should not be used, and instead, data from a single day (Saturday, April 1, 2012) survey of 859 vehicles (yielding an AVO of 2.2) should instead be used. The 2012 survey was based on vehicle occupancy observations in the "prime day skier lots east of the existing Village." Although the 2012 survey results were the best data available at the time, the 2015 online survey is a more suitable data point for use in the estimating AVO associated with new skiers generated by the gondola. When compared to the 2012 survey, the 2015 survey focused on multiple ski days (versus a single day), had a generally comparable sample size, considered skiers visiting both resorts, and was not limited to one specific area of parking at Squaw Valley Ski Area. Thus, the Draft EIS/EIR relies upon the best available data to estimate AVO, which was the 2015 survey, and is supported by substantial evidence. (See *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 544 [deference to city in metrics used in traffic analysis].)

Also, see responses to comments 0072-11 and 0144-47 regarding the comment's statement that impacts were underestimated.

0144-36, Transportation and Circulation/Traffic and Parking (T&C/T&P)

For information on the feasibility/infeasibility of fixed route transit service to Alpine Meadows see the Master Response related to Vehicle Trip Reduction Measures provided in Section 1.8, "Master Responses."

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0144-37

Visitation changes attributable to the gondola:

The Appendix C estimates of incremental visitation changes attributable to the gondola are derived from a very limited data set of "major" lift projects at destination resorts whose relevance to the gondola project is admitted to be uncertain (p. 16). (All page number references in this section are to Appendix C). The lift project with the maximum 6.6% incremental change must differ from the other projects in some interesting respects, and in fact it is the only project with expanded skiable terrain (p. 16). Since the gondola project would greatly expand skiable terrain, the project with maximum incremental change appears to be especially relevant to visitation analyses of the gondola.

The analysis asserts that the project with maximum incremental change is not especially relevant to the analysis because the gondola would be *"a singular lift project without providing access to additional skiing/riding terrain"* (p. 16). This assertion is not consistent with the information provided in the DEIS/R and in other project descriptions – skiers boarding the gondola at Squaw would access several thousand acres of additional terrain at Alpine, and vice versa, much more quickly. One of the purposes for which the gondola would be utilized is *"rid[ing] the gondola to the base of the other resort to access the additional terrain ..."* (p. 4). Eight similar reasons for riding the gondola are listed (p. 4-5). The SquawAlpine website consistently promotes the gondola by pointing out to skiers "What if you didn't have to choose [between Squaw and Alpine]?"

Taking note of the values in the data set but using several arbitrary estimates of incremental change in the range of these values in subsequent analyses would appear to be as plausible as a single analysis using the average incremental variation. Estimates of incremental change near the upper end of the range would appear to be especially plausible, since the gondola would significantly expand skiable terrain. Use of the average incremental variation is claimed to be "conservative" (p. 16). Analyses of environmental impacts that take care not to underestimate impacts are "conservative"; using the average incremental variation in this analysis is not "conservative." Using the higher estimates of incremental change in congestion analyses would more accurately determine the amount of congestion.

The FEIS/R must use analytical approaches that most accurately determine the amount of congestion.

"Extended weekend" peak traffic analysis:

0144-38

The DEIR/S did not adequately consider longer stays as a strategy employed by visitors in an effort to avoid congestion. The enhancement of skiing opportunities by the gondola may be especially attractive to skiers who visit for more than a single day or a two-day weekend. Their extended presence would have the effect of increasing congestion beyond just the two-day weekend rush.

As an anecdotal illustration of this, FOWS and SCTAG members living on the west shore and north shore of Lake Tahoe have consistently observed and have been annoyed by the more frequent occurrence of "ski weekend" congestion on Fridays and Mondays. These occurrences are plausibly caused by skiers trying to avoid late Friday, Saturday, and Sunday congestion. If traffic data substantiating these observations are available, traffic analyses in the EIS/R should utilize them. Stated more quantitatively, the distribution of "longer-weekend" traffic counts might plausibly shift upward in the future, with part of that upward shift attributable to the gondola (in fact, the DEIS/R

0144-37, Recreation (R1)

The gondola project would not "greatly expand skiable terrain" as stated by the commenter. Instead, the gondola project would be a singular lift project providing improved access to presently available terrain and would result in no new skiable terrain becoming available. This distinction between providing access to new terrain and improving access to presently available terrain is integrally important to the Visitation and Use Assessment, and was a key element in determining which of the 52 general ski resort improvement projects discussed on page 16 (of the Visitation and Use Assessment -Appendix C) were similar in nature to the gondola project. The lift project with the maximum 6.6% incremental visitation change was specifically determined not to be representative of the visitation change that would result from the gondola project because it provided access to substantial new skiing terrain and resulted in a significant ski terrain expansion, which the gondola project would not.

It is true that one of the primary purposes for which guests of either resort may ride the gondola would be to "access the terrain offered at the other resort." However, this statement refers to presently available terrain for which access would be improved, and is not inconsistent with any other part of the Visitation and Use Assessment or Draft EIS/EIR.

In short, the gondola project would not expand skiable terrain at Squaw Valley or Alpine Meadows, and would instead provide improved access to presently available terrain at the two ski resorts. As such, the use of the lift project with the maximum 6.6% incremental visitation change, which provided access to a significant new terrain expansion, was not selected to accurately represent the estimated visitation increase associated with the gondola project.

0144-38, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment suggests that the project could result in "extended weekend stays," which would increase the duration of congestion beyond the typical two-day weekend peak." The comment further requests that the Final EIS/EIR evaluate existing and future conditions impacts on Mondays and Fridays.

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As described on page 4.7-19 of the Draft EIS/EIR, the project is not expected to change the overall proportion of weekend versus weekday skier visits. Page 4.7-5 states, based on review of traffic counts, that there already exists a component of skiers visiting these resorts on a weekend who arrive to the Tahoe Basin on a weeknight. Therefore, this analysis approach does assume some skier visits generated by the gondola would occur during weekdays. Review of skier visits during the 2016-2017 season at the Squaw Valley and Alpine Meadows Ski Areas indicates that the median number of skiers on Fridays and Mondays was much lower than the median number of skiers on weekend days. If the project were to have a higher percentage of weekday visitors than the current skier visitation data shows, these trips would be made during less congested periods (as opposed to weekends). If a shift in some project trips away from the Saturday and Sunday peak hours were to have been assumed, the analysis would likely have shown lesser project impacts during peak traffic periods, which is the focus of the analysis (i.e., assessing changes in traffic conditions during periods of peak traffic flows). However, it would have been speculative (given the lack of any supporting data) to have assumed a certain shift in skier visits from weekends to weekdays (beyond what currently occurs at the resorts).

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0144-38
cont'd

acknowledges this potential outcome³⁸). Whether the analyses of peak-hour congestion in section 4.7 properly accounts for this “longer-weekend” effect is questionable.

A technical note: Figures 1 and 2 of Appendix C (p. 7-8) do not effectively display the relationships between the variables. A scatterplot of each pair of variables should be added to Appendix C. Correlations are well known to be strongly influenced by outliers. Scatterplots facilitate assessments of this influence.

The FEIS/R must disclose that beyond increased peak traffic during the Saturday/Sunday peak hours, which would determine the maximum impact, the project will likely result in substantial increases in Monday and Friday traffic, such that the duration of what would be considered peak traffic conditions will potentially extend from two to four days. The FEIS/R must assess existing and future conditions on these additional days.

Noise (Section 4.9):

All action alternatives:

0144-39

While the general impacts from noise are discussed in the “Wilderness” section, no specifics are provided regarding the noise levels (existing or future) specifically addressing noise in the GCWA and estimated impacts from each alternative (with the exception of one aspect of Alternative 2; see below). Noise increases would impact wilderness and recreational experiences and wildlife. While gondola operation in the summer months would be limited to maintenance activities, this will still create noise beyond existing levels during those times. Noise impacts during both winter/operational months and summer months should be evaluated and disclosed.

The FEIS/R must clearly discuss and disclose the existing noise conditions in the GCWA during winter and summer months and the anticipated noise impacts from each alternative to GCWA lands (affected publicly- and privately-owned lands) from gondola operation as well as avalanche control.

Alternative 2:

0144-40

The DEIS/R noise section briefly discloses maximum noise at the eastern boundary of the National Forest System-GCW (i.e., 100 feet west of proposed tower locations) as 62.6 dBA Leq, which is far above noise standards applied to other uses (e.g. theaters, auditoriums, churches, office buildings, schools, etc.) that are far less sensitive to noise than the GCWA. However, there is no further discussion of this impact. For example, how often will this noise occur during the summer months (e.g. associated with maintenance activities)?

The FEIS/R must clearly discuss all noise impacts to the GCWA.

³⁸ “The proposed gondola may increase the duration of time that skiers remain in overnight accommodations at each resort. Because resort room occupancies are typically greatest on weekends, this could result in more skier visits extending their stay into the mid-week period (pg. 12).” (p. 4.7-18)

0144-38 cont'd, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0144-39, Noise (N)

The comment requests that the EIS/EIR discuss and disclose the existing noise conditions in the Granite Chief Wilderness (GCW) during winter and summer months and the anticipated noise impacts from each alternative.

Noise impacts are addressed in Section 4.9, “Noise,” of the Draft EIS/EIR. Impacts 4.9-1 and 4.9-2 describe the project’s construction noise impacts and Impacts 4.9-3 and 4.9-4 describe the project’s operational noise impacts. Modelled maximum noise levels at the nearest boundary of the GCW are provided in the impact discussion of Impact 4.9-3 for each action alternative (62.6 dBA Leq for Alternative 2, 52 dBA Leq for Alternative 3, and 35.6 dBA Leq for Alternative 4). Note that these noise levels are based on a reference noise level recorded at the base terminal for the Far East Express, where a drive motor is present and lift chairs are entering and leaving the terminal. Facilities nearest the GCW under all action alternatives would be mid-stations and towers. Mid-stations have no drive motors and total noise generation would be expected to be less than base-terminals. Gondolas or lift chairs passing over towers make much less noise than base-terminal operations. As identified on page 4.9-22 of the Draft EIS/EIR, when the gondola is moving between towers, there are no moving parts and thus no noise sources. Therefore, actual gondola operational noise at the boundary of the GCW would be much less than what the estimates based on the Far East Express reference noise measurements would indicate. Noise levels would be further reduced the farther a listener was from the GCW eastern boundary.

Effects of the proposed project on the GCW are addressed in Section 4.3, “Wilderness”, and in particular the discussions if Impact 4.3-4: Effects on Opportunities for Solitude or Primitive and Unconfined Recreation.

As discussed in the Draft EIS/EIR in several locations, including in the noise analysis on page 4.9-22, the gondola would operate from approximately 8:00 a.m. to 6:00 p.m. during the winter season only. Due to the snow conditions, use of the GCW by the public and within proximity to the project area is substantially less during the winter season than during the summer. For this reason, the number of individuals that

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would find gondola operations audible from the GCW is inherently, and substantially, less than in summer months. Regarding summertime maintenance activities, these would only take place during the daytime hours, and would be infrequent and intermittent (further details are provided in response to comment 0144-40, below). During the limited times that gondola cars are moved along the line as part of maintenance activities, noise generation would be similar to regular operations. Although there is greater recreational use of the GCW in the project area during the summer, the frequency of use and the hours of the gondola being in motion for maintenance would be substantially less than the daily winter operations.

With Gazex removed from the project between the Draft and Final EIS/EIRs, the resulting effect on avalanche mitigation operations under the action alternatives would be the replacement of some existing artillery targets with use of hand charges and avalaunchers in these areas. The location and need for avalanche mitigation actions would not change and hand charges and avalaunchers are already used for avalanche mitigation in the area. Therefore, wintertime noise effects would have only minimal changes, and total noise generation could be less as hand charges make less noise than artillery warhead explosions (see Table 4.9-12 of the EIS/EIR).

0144-40, Noise (N)

The comment requests that the Draft EIS/EIR discuss and disclose how often noise from the gondola would occur during the summer months. Response to comment 0144-39 addresses the modelled noise generation at the eastern GCW boundary and the fact that the modelling results overestimate noise generation. This overestimate of noise generation applies to both winter operation and summer maintenance activities. Periods of "running" the gondola for maintenance in the summer months are described on page 2-14 of the Draft EIS/EIR; "To perform maintenance, some cabins would need to be put on the line for limited periods during the summer (fewer than 10 times during the summer for running all cars, and 3-5 days per month for limited numbers of cars moved across the line)."

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Recreation (Section 4.1):**All action alternatives:**Recreation indicators – downhill skiing/boarding versus dispersed recreation:

The DEIS/R essentially ‘divides’ recreation experience impacts³⁹ into two categories: impacts to downhill skiing/boarding and impacts to dispersed recreation (e.g. hiking, snowshoeing). In all action alternatives, the DEIS/R notes benefits to downhill skiing and negative impacts to dispersed recreation, although it concludes the impacts to dispersed recreation are mitigated (NEPA) and LTS (CEQA) for all action alternatives (discussed more below). Dispersed recreation in Wilderness Areas and other protected locations has become more popular. This raises questions about the wisdom of creating benefits for developed recreation (e.g. skiing) at the expense of dispersed recreational experiences. (Note: our comments on the wilderness resource evaluation also apply to the evaluation of the alternatives on dispersed recreation experiences).

Impacts to the dispersed recreation experience, access, and visitation must be clearly documented and mitigated in the FEIS/R. Further, the FEIS/R should address present and anticipated future trends in recreation (including developed and dispersed recreation).

Alternative 2:Dispersed Recreation impacts:

While REC-4 would mitigate potential impacts from increased access to the GCWA via the mid-stations, Alternative 2 will still significantly impact the dispersed recreation experiences in the Granite Chief Wilderness Area through visual, noise, wildlife, and wilderness impacts (as discussed elsewhere in these comments).

The FEIS/R must clearly disclose the impacts to dispersed recreation as Adverse and Significant and Unavoidable as a result of visual, noise, wildlife, and other wilderness impacts.

Alternatives 3 and 4:Additional access to the GCWA and TNE:

The DEIS/R concludes the impacts to dispersed recreation from all action alternatives are mitigated (NEPA) and Less Than Significant (CEQA) through application of RPMs MUL-7 (related to mitigation of construction impacts), and REC-1 through REC-4 (of these REC-1 through REC-3 are related to construction; REC-4 prohibits foot traffic from exiting at either mid-station [for Alternative 2]). Only REC-4 provides any mitigation for the operational (long-term) impacts to dispersed recreation, however no such measures are proposed for mid-stations in Alternatives 3 and 4.⁴⁰

³⁹ Impact 4.1-1: Recreation experience, access, and visitation

⁴⁰ “REC-4: Signage will be posted at both the Squaw Valley and Alpine Meadows base terminals and mid-stations stating that walking or hiking trail access directly from the gondola (i.e., by exiting at a mid-station) is strictly prohibited. The applicant will not permit foot traffic to exit at the Squaw Valley mid-station, or the Alpine Meadows mid-station under Alternative 2.”

0144-41, Recreation (R1)

The benefits and drawbacks of improving developed recreation at the expense of dispersed recreation (conclusions reached in the Draft EIS/EIR) will be weighed against each other by the decisionmaker in the Draft Record of Decision to determine the merit of implementing the project.

It is important to note that the only piece of public land within the project area for which management direction is up to the discretion of the Forest Service is the land within Alpine Meadow's SUP area, which has been allocated to the Scott Management Area (per the Forest Plan). The Scott Management Area directs: "Development of the private sector ski area maintenance, operation, and planning will be emphasized during the planning period..."

The gondola project is in line with this direction provided for the Scott Management Area, and the remainder of the project area would occur on private lands (i.e., the management direction for the only piece of publicly owned and managed lands within the project has already been established). As such, analysis of present and anticipated future trends in recreation for both developed and dispersed recreation would extend beyond the scope of the analysis for this gondola project and into the realm of general planning for the Tahoe National Forest.

0144-42, Recreation (R1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Direct and indirect impacts to wilderness areas are discussed in Section 4.3.3 of the EIS/EIR. The EIS finds that the potential effects of the project on opportunities for solitude or primitive and unconfined recreation are adverse under Alternative 2 but will be mitigated through the application of RPMs SCE-1 and SCE-2 (please refer to Impact 4.3-4 (Alt. 2) in the Final EIS/EIR). The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project, and the opinion expressed by the commenter urging a significant and unavoidable conclusion, into consideration when making a decision regarding the project.

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0144-43, Recreation (R1)

The same Resource Protection Measures (RPMs) identified for Alternative 2 would apply to Alternative 3 and Alternative 4. These include RPMs related to Scenic Resources, Noise, Biological Resources, and Soils and Erosion, RPMs MUL-4 and MUL-7, and recreation specific RPMs REC-1 through REC-4, as stated in the EIS/EIR (pages 4.1-17 and 4.1-20).

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0144-43
cont'd

The FEIS/R must address the potential impacts from passengers accessing the GCWA and TNF through the mid-stations in Alternatives 3 and 4. A prohibition of foot traffic, such as included in REC-4, should also be included for both mid-stations in Alternatives 3 and 4.

Cumulative impacts with Rollers Lift:

0144-44

The Scoping Report (e.g. p. 4-5) identifies numerous public comments regarding the need to analyze the cumulative impacts with the Rollers Lift, which appears to rely on the construction of the gondola to be feasible, yet the DEIS/R fails to even mention the cumulative impacts of the Rollers lift with regards to wilderness, noise, increased visitation (creating transportation impacts), and visual resources. The only place that it is discussed in is the Recreation section, although little information is provided.⁴¹ It is omitted from all other resource discussions. The brief statement notes impacts to dispersed recreation from noise and visible infrastructure associated with the Rollers lift and refers the reader to the individual chapters for noise, wilderness, and visual resources for further evaluation yet the Rollers Lift is not mentioned anywhere in these other resource chapters.

The DEIS/R contains no explanation of why these cumulative impacts are not analyzed in all affected resource sections. This is a gaping hole in the entire DEIS/R analysis and must be corrected in the FEIS/R. We also recommend that a map identifying the proposed project, White Wolf Subdivision, and Rollers Lift be presented to allow the public and decision-makers a visual representation when considering cumulative impacts.

Air Quality (Section 4.10):

All action alternatives:

Increased emissions in Lake Tahoe Air Basin:

0144-45

Although DEIS/R acknowledges that the action alternatives will increase vehicle emissions in the Lake Tahoe Air Basin, there is no analysis of the long-term operational impacts within the Lake Tahoe Air Basin. The LTAB is currently classified as non-attainment transitional for ozone,⁴² and increases in NOx and ROG will facilitate more ozone formation. Further, traffic conditions in the Lake Tahoe Basin are already gridlocked during peak periods; the additional vehicles the proposed project will bring to the area will further contribute to congestion and increase idling time.

The FEIS/R must disclose impacts from vehicle emissions within the Lake Tahoe Air Basin. Impacts should be based on a revised transportation analysis that utilizes the best available occupancy data (as discussed elsewhere in these comments) and considers the impacts of increased idling.

⁴¹ "The increased use surrounding the Alpine Meadows mid-station and Rollers lift area would result in noise and visible infrastructure adjacent to the National Forest System-GCW, which are further evaluated in Sections 4.2, "Visual Resources"; 4.3, "Wilderness"; and 4.9, "Noise."" (p. 4.1-24)

⁴² https://www.arb.ca.gov/desig/adm/2016/state_o3.pdf

0144-43 cont'd, Recreation (R1)

The same Resource Protection Measures (RPMs) identified for Alternative 2 would apply to Alternative 3 and Alternative 4. These include RPMs related to Scenic Resources, Noise, Biological Resources, and Soils and Erosion, RPMs MUL-4 and MUL-7, and recreation specific RPMs REC-1 through REC-4, as stated in the EIS/EIR (pages 4.1-17 and 4.1-20).

0144-44, Recreation (R1)

The Final EIS/EIR has been updated to include cumulative effects analysis related to the Rollers Lift in Sections 4.2, "Visual Resources," 4.3, "Wilderness" and 4.9, "Noise."

0144-45, Air Quality (AQ)

The comment states that no analysis of long-term operational air quality impacts, specifically increases in mobile-source emissions, were evaluated in the Draft EIS/EIR. Table 4.10-6, "Maximum Daily Operational Emissions" summarizes operational emissions for Alternative 2. In Impact 4.10-2 (Alt.2), operational emissions associated with project development were quantified and presented by source, including increases in mobile-source emissions of reactive organic gasses (ROG) and oxides of nitrogen (NOx). Estimated total project operational emissions were then compared to Placer County Air Pollution Control District's (PCAPCD) adopted CEQA thresholds of significance and were found to be below for all pollutants. PCAPCD has jurisdiction over the entirety of Placer County, including the portion of the County within the Lake Tahoe Basin. Therefore, because project emissions are below PCAPCD thresholds, the emissions impacts are considered less than significant in the entirety of the PCAPCD jurisdiction including the Lake Tahoe Basin. Further, as discussed for Impact 4.12-2 (Alt.3) and Impact 4.12-2 (Alt.4), increases in operational-related mobile-source emissions for Alternative 3 and Alternative 4 would be the same as disclosed under impact 4.10-2 (Alt.2). Air quality modeling was based on trip generation and vehicle miles traveled (VMT) estimates generated for the project by the traffic consultants (Fehr & Peers). All traffic data used to model emissions are presented in Appendix G of the Draft EIS/EIR. No additional modeling or analysis is necessary.

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See the response to comment 0144-35 regarding vehicle occupancy data.

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0144-46

NEPA impact and mitigation:

All action alternatives would have an adverse impact according to NEPA because it would result in a permanent increase in emissions of ROG, NOx, and PM.⁴³ The DEIS/R concludes this will be mitigated through RPMs AQ-9 and AQ-23 (p. 4.10-16). However, these two RPMs involve mitigation through Placer County regulations, which only require mitigation for the amounts that exceed the County's 55 pounds/day threshold.⁴⁴ Because the estimated emissions from the action alternatives will not exceed the County's threshold, it does not appear any mitigation fees or participation in an offsite mitigation program will be required. As a result, there are **no actual reductions in emissions**, and the DEIS/R has not shown the adverse effect to be mitigated.

Mitigation must be identified in the FEIS/R.

Greenhouse Gas Emissions (Section 4.11):**All action alternatives:**

0144-47

The DEIS/R concludes GHG emissions will not exceed PCAPCD's applicable 1,100 MT CO₂-e/year (p. 4.11-12). We appreciate Squaw Valley/Alpine Meadows' aim to form an agreement with Liberty Utilities for all energy to the project area to be provided from renewable resources by the end of 2018. However, the cumulative impact discussion fails to address the growth-inducing impacts that would encourage the White Wolf Subdivision, which would be expected to generate substantial GHG emissions above current conditions. In addition, the GHG estimates are based on the transportation analysis, which underestimates impacts due to the use of higher vehicle occupancy rates.

The GHG emissions associated with the project's growth-inducement must be addressed in the FEIS/R. The FEIS/R should also include a revised GHG estimate based on the more appropriate occupancy rate previously discussed.

Public safety - Emergency Evacuation (Section 4.6):**All action alternatives:**Emergency evacuation:

0144-48

The DEIS/R dismisses impacts to emergency evacuation situations by stating peak occupancy is limited by parking availability and other factors.⁴⁵ However, as the DEIS/R notes, on peak days, drivers may attempt to park only to find the parking is full. As noted elsewhere in our comments,

⁴³ Under Alternative 2, operational activities would result in emissions of ROG, NOx, and PM. Under NEPA, and considering the NEPA indicators, absent RPMs and/or mitigation, direct and indirect impacts occurring from operation would be adverse because operation would result in permanent increases in emissions of ROG, NOx, and PM. 4.10-16

⁴⁴ A) Participate in the Placer County Air Pollution Control District (PCAPCD) Offsite Mitigation Program by paying the equivalent amount of money, which is equal to the project's contribution of pollutants (ROG and NOx), which exceeds the cumulative threshold of 55 pounds per day. B-11

⁴⁵ "Emergency response and evacuation plans are designed to address peak occupancy conditions, and peak occupancy is limited by parking availability, mountain capacity, and other factors." (p. 4.6-8)

0144-46, Air Quality (AQ)

The comment states that adverse air quality impacts under NEPA have not been adequately mitigated because the RPMs identified to reduce operational air quality impacts (i.e., AQ-9 and AQ-23) would only apply to emissions that exceed PCAPCD thresholds of significance. However, the analysis for Impact 4.10-2 (Alt. 2, Alt. 3, and Alt. 4) indicates that the adverse impact would occur "absent RPMs and/or mitigation." In addition, the analysis also explains that RPM AQ-9 would only be in effect if emissions were to exceed PCAPCD thresholds. Thus, although this RPM would not provide direct emissions reductions if emissions do not exceed the thresholds, it is retained in the EIS/EIR to ensure that emissions do not exceed applicable thresholds. Further, RPM AQ-23, through the PCAPCD permitting process, would ensure that stationary sources, would not result in substantial emissions that exceed PCAPCD limits. All potential adverse air quality impacts have been identified and appropriately mitigated. No further mitigation is necessary.

0144-47, Greenhouse Gases (GHG)

The comment states that the project could result in growth-inducing impacts by encouraging approval, construction and operation of the White Wolf Subdivision by nature of the project applicant's aim to reach agreement with Liberty Utilities to provide all power to the project from renewable sources. In the commenters view, this could result in indirect greenhouse gas emissions via future approval of the White Wolf Subdivision. There is, however, no evidence demonstrating that the County would be more likely to approve the White Wolf Subdivision if the project and the project's related infrastructure is approved, and irrespective of whether or not the applicant reaches a renewable energy agreement. The reasonably foreseeable growth inducing impacts of the project are discussed in Section 5.2.3 of the Draft EIS/EIR. The White Wolf Subdivision would not benefit from infrastructure required for the proposed project, if approved. The project therefore would not be growth-inducing by "encouraging" approval of the White Wolf project. (See also response to comment 0144-49, below). See also responses to comments explaining the independent utility between the proposed project and the White Wolf Subdivision; specifically, that one project does not cause the need for the other. (See response to comment 0166-6.)

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As discussed on page 4.11-1, the GHG analysis is inherently cumulative as project-generated emissions contribute to global climate change.

The comment also asserts that the transportation assumptions and associated GHG emissions are underestimated because they use higher vehicle occupancy rates.

Regarding the traffic assumptions, as discussed in Chapter 4.7, "Transportation and Circulation," on page 4.7-18, "the analysis conservatively assumes all skiers (under both existing and cumulative conditions) would be day skiers who enter and then exit each resort in a single day." As discussed on page 4.11-11 of the GHG analysis, mobile-source emissions were quantified using traffic estimates associated with increases in skier days. In addition, it is anticipated that the project would result in a shift in users within the Lake Tahoe Area that might prefer to park at Squaw Valley or Alpine Meadows due to the presence of the gondola. However, the traffic analysis did not make adjustments for this likelihood, but rather assumed all new trips would go to and from Squaw Valley or Alpine Meadows to other surrounding regions. Thus, in reality, it is more likely that increases in visitation to Squaw Valley and Alpine Meadows as a result of the project would come from people already traveling to the Lake Tahoe Region for recreational purposes, and the project would not result in increases regional travel-related trips or emissions. Nonetheless, the traffic assumptions did assume new trips would occur and, therefore, the assumptions used to estimate GHG emissions were conservative. Also see response to Comment 0144-35 regarding vehicle occupancy rates used in the EIS/EIR traffic analysis. The GHG analysis adequately evaluates the potential increases in traffic and associated GHG emissions.

0144-48, Public Safety (PS)

The comment states that the Draft EIS/EIR has not provided evidence of whether proposed mitigation measures/RPMs actually reduce additional vehicular traffic associated with vehicles turning around due to parking being full. The comment then cites concerns that this additional traffic may contribute to worsened congestion during an emergency event.

As described in Draft EIS/EIR Chapter 2, "Description of Alternatives," under all action alternatives the gondola would only operate during the winter ski season. Therefore, any

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increase in visitation attributable to the Gondola would not occur during the summer months, and project operation would not interfere with potential summertime emergency events such as wildfire. The types of rapid mass evacuations referenced by the commenter are typically limited to responses to wildfires. Avalanche would be the most likely emergency event during the winter months. Although avalanches may require a rapid emergency response in the area directly affected by the avalanche, rapid mass evacuations that would result in traffic congestion are not needed.

The analysis included in Sections 4.6, "Public Safety," and 4.7, "Transportation and Circulation," does take into consideration the estimated visitation increase of 1.4% that could result from the project (please refer to Appendix C, "Squaw Valley | Alpine Meadows Base-to-Base Gondola Final Visitation and Use Assessment"). In summary, the estimated visitation increase of 1.4% would not be substantial enough to considerably increase congestion during an emergency event; therefore, this scenario would not adversely impact emergency evacuation operations. For this reason, Section 4.6 concludes that impacts related to emergency response or evacuation would be less than significant, and Section 4.7 concludes that the project would not alter emergency vehicle access provisions.

Mitigation Measure 4.7-15 addresses the potential for vehicles to turn-around due to the Squaw Valley Ski Area being parked out. A number of potential strategies are suggested to reduce the number of vehicles performing U-turns along Squaw Valley Road during parked out conditions. While the effectiveness of eliminating every potential U-turn cannot be assured, there is ample evidence from arenas, entertainment centers, and other large gathering places that changeable message signs, mobile message apps, and parking/traffic attendants can be effective at deterring undesired travel behavior. Just as these measures would minimize vehicles entering Squaw Valley and Alpine Meadows when parking lots are full on a peak day, they would also minimize vehicles entering the resort areas during an emergency event. In fact, during an emergency event, it is likely that first responders would coordinate with Squaw/Alpine to use message signs, mobile message apps, and parking/traffic attendants to direct traffic in a way to minimize adverse effects on the emergency response.

The issue of vehicle occupancy assumptions raised in the comment is addressed in the response to comment 0144-35.

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the DEIS/R has not provided evidence of whether the proposed mitigation measures/RPMs actually reduce this additional traffic. Thus, these additional trips may contribute to further congestion during an emergency event. Further, use of a higher vehicle occupancy rate to evaluate new vehicle trips is likely to have underestimated traffic impacts, affecting the consideration of this impact as well.

The FEIS/R must include an analysis of the impacts of the increased visitors on peak days, including impacts related to visitors that still drive on roads⁴⁶ even when parking is full, to emergency evacuation (both evacuation and emergency access).

Wildfire risk:

0144-49

According to the DEIS/R, impacts associated with wildfire risk are not analyzed further because the project would not result in placing additional housing or structures in a wildland area (p. 4.6-9). However, as our comments note, this project may induce growth by adding infrastructure that would make the White Wolf Subdivision development more likely in the future, which will place housing and structures in a Calfire Very High Fire Hazard Severity Zone.⁴⁷

The FEIS/R must disclose this impact.

Alternatives 3 and 4:

0144-50

The cumulative impacts discussion related to public health and safety erroneously states the proposed White Wolf Subdivision on Caldwell's property is "not connected to actions" in Alternatives 3 or 4,⁴⁸ however as noted in our comments, Alternatives 3 and 4 will require a new permanent access road on the Caldwell property that may encourage more growth by adding infrastructure to an area where it does not currently exist.

The FEIS/R must be corrected to address the cumulative impact of the gondola and White Wolf Subdivision, as well as the Alpine Sierra Subdivision, on public health and safety (including the evacuation and wildfire-related impacts mentioned above).

Wildlife (Section 4.14):

All action alternatives:

Sierra Nevada Yellow-Legged Frog (SNYLF) and "no summer operation of the gondola"

0144-51

The DEIS/R claims that the gondola will not be operated during the summer and that this reduces impacts to SNYLF. The frog is not active during the winter freeze up, and the gondola would not be running when it emerges from its winter torpor as the snow and ice melts off. But as noted previously, the DEIS/R also indicates that the gondola may be used up to ten times during the summer for maintenance and that a limited number of cabins will be on the line for 3-5 days at a

⁴⁶ Including Squaw Valley Road, Alpine Meadows Road, and SR 89.

⁴⁷ http://frap.fire.ca.gov/webdata/maps/placer/fhszs_map.31.jpg

⁴⁸ "For the same reasons described under Alternative 2, the Caldwell property development and General Development in Olympic Valley are not a connected actions to Alternative 3 or 4." (p. 4.6-21 -22)

0144-48 cont'd, Public Safety (PS)

0144-49, Public Safety (PS)

As the comment notes, the project would not result in the placement of housing and other structures that would contain substantial numbers of people in a wildland area.

The possibility that the project may induce growth by adding infrastructure that would make the White Wolf Development more likely in the future is speculative and beyond the scope of this analysis. The White Wolf subdivision, if approved, would be located on the Alpine Meadows side of the mountain (not Squaw Valley) and would therefore need to be served by infrastructure (water, sewer etc.) that is independent from the infrastructure needed to implement any of the action alternatives, such as towers, mid-stations, terminals, etc. CEQA requires "[no] more than a general analysis of projected growth." (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* [2001] 91 Cal. App. 4th 342, 369; see also CEQA Guidelines, §§ 15126[d]). The factors to be considered include "the nature of the project, the directness or indirectness of the contemplated impact and the ability to forecast the actual effects the project will have on the physical environment." (*Ibid.*) Here, the projects are unrelated (a gondola project to transport skiers v. a residential subdivision project) and therefore require different and largely unrelated infrastructure. The proposed project, for example, does not include a sewer or water line extension for which the White Wolf project could also use in the future. Alternative 2 is therefore not growth-inducing as that term is understood under CEQA/NEPA.

The White Wolf Development is considered, however, in Section 4.6.4: Cumulative Effects of the EIS/EIR for the public safety resource. Cumulative effects are defined in Section 3.5.1 of the EIS/EIR. Any public safety impacts directly resulting from the placement of housing and structures in a Calfire Very High Fire Hazard Severity Zone would be analyzed in subsequent CEQA documentation focused primarily on the White Wolf Development.

0144-50, Public Safety (PS)

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The segment of new permanent road on the Caldwell property identified by the commenter would only be constructed under Alternative 4. The possibility that the presence of this road could encourage new growth on the Caldwell property does not signify that the White Wolf Development and Base-to-Base Gondola Project are connected actions. As stated in the Draft EIS/EIR, this is because the implementation of the White Wolf Development does not depend on approval of the Base-to-Base Gondola Project, and vice versa. Each of these projects could be implemented individually (i.e., without implementation of the other one) and still serve its purpose. The road proposed under Alternative 4, moreover, if approved, would be used for limited access to the proposed mid-station. If the White Wolf Development is approved, Placer County may allow the road to be used by residents (and guests) of the White Wolf Development, as explained in the Draft EIS/EIR at page 2-27.

As is required for the cumulative effects analysis under NEPA and CEQA, the Draft EIS/EIR does analyze the potential cumulative impacts of the Base-to-Base Gondola Project and White Wolf Development on public safety (please refer to page 4.6-22). In this analysis, the two projects are considered as additive actions, not connected actions.

0144-51, Wildlife and Aquatics (W&A)

Summer maintenance for the proposed Gondola is described on page 2.13-14 of the Draft EIS/EIR. As proposed, the Gondola would not transport guests during the summer months. Some of the cabins would need to be put on the line for limited periods during the summer (fewer than 10 times during the summer for running all cars on the line, and 3-5 days per month for limited numbers of cars moved across the line). As a distinction between "operations" and "maintenance", during summer maintenance the Gondola would not be moving cabins all day, but only during short periods of activity during the day.

The comment provides no evidence that SNYLF would be affected at all by Gondola cars travelling overhead for short periods during the summer. The Sierra Nevada yellow-legged frog is highly aquatic, and is rarely found more than a few feet from water. The only known occupied aquatic habitat is Barstool Lake, more than 100 feet from nearest piece of Gondola infrastructure. During summer months, when no snow is present, Gondola cabins would be travelling at least 25-feet

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above the ground surface, and typically higher. As noted in the discussion of operational noise impacts on page 4.9-22 of the Draft EIS/EIR "When the gondola is moving between towers, there are no moving parts and thus no noise sources. Noise levels between towers would be minimal and would not increase ambient noise levels over existing conditions." Therefore, it is highly unlikely that a SNYLF, at ground level, would even perceive a gondola car travelling between towers nearby. Noise would be generated when the gondola cabin passes over the horizontal arm on the top of a tower. However, from those with direct experience riding ski lifts and gondolas, passing over the "wheels" at a tower does not generate excessive noise. The primary noise-generating element of a ski lift or gondola is at the base terminals where the motors that power the facility are located. The base terminals are far from any locations where SNYLF would be expected to be found. The further consideration of summertime gondola maintenance activities does not alter the analysis or conclusions in the EIS/EIR related to potential impacts to SNYLF.

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time. Ten times a season per cabin plus additional cabins on the line for 3-5 days at a time is not the same thing as no summer operation, and the obvious concern is that this level of usage could have detrimental impacts on the behavior of the SNYLF. It could be argued that infrequent use might cause more impact than consistent use.

It is not clear to us if an amphibian like the SNYLF would be more affected by a consistent sound and movement disturbance like a gondola running all the time than it would by an infrequent one. Many animals appear to acclimate to constant road noise, but an occasional car on an otherwise empty roadway seems assured to create a change in behavior.

The FEIS/R must analyze the impact of any summer operation of the gondola, including usage for maintenance, on the SNYLF.

Eagles and gondola wires

0144-52

The DEIS/R and the BA claim that eagles are not generally known to strike ski lift lines. We are concerned about the veracity of such a claim based on recent research about bird strikes and power lines. Though power lines and ski lift cables are not the same thing, they are very similar and would seem to create an equivalent hazard for flying birds. The most significant difference for them would be where they are placed on the landscape. It is common for transmission lines to be placed along roadways or other existing rights of way. Ski lifts do not as a rule run along roadways.

Potential eagle strikes on ski lift lines would be most likely in the summer when eagles have returned from lower elevations and when the cabins have been removed resulting in the lines being less visible. But, a lift line that has no cars on it and is not operational in the summer time means that the likelihood of eagles or other birds that hit a lift line being detected would be remote at best because there would be no one around to detect such a strike.

Looking to transmission lines to get an understanding of the problems of detection of bird strikes with another avian species, Sandhill Cranes, recent work by Murphy et al. (2016a⁴⁹), which combined searches for carcasses along lines with the use of electronic detectors of collisions and monitoring with night-vision spotting scopes, showed that historical studies of crane collisions with transmission lines have likely underestimated crane collision by at least a factor of 3 to 4 (2.8-3.7). Prior studies of collision risk relied mainly on searching for carcasses under transmission lines. Murphy et al. (2016a), by combining carcass searches with remote sensing of collisions and observing at night with night-vision optics, showed that these studies greatly underestimated collisions. These authors found that many cranes injured in collisions were able to get beyond the area under the lines which are normally searched, and thus, these mortalities were missed.

The comparison of the natural history and flight habits of cranes versus eagles is not relevant to the point that we are trying to make. But rather, the likelihood of an eagle that hit a ski lift line being discovered seems extremely unlikely, much more so than a crane hitting a transmission line since transmission lines have so much more traffic. Eagles that hit ski lift lines that are not operational in the summer, and don't have cabins on them, and don't have regular foot or other traffic below

⁴⁹ Murphy, R. K., E. K. Mojica, J. F. Dwyer, M. M. McPherron, G. D. Wright, R. E. Harness, A. K. Pandey, and K. L. Serbousek. 2016a. Crippling and nocturnal biases in a study of Sandhill Crane (*Grus canadensis*) collisions with a transmission line. *Waterbirds* 39(3):312-317.

0144-51 cont'd, Wildlife and Aquatics (W&A)

0144-52, Wildlife and Aquatics (W&A)

The potential impact to golden and bald eagles from striking the gondola cable was analyzed in the Draft EIR/EIS on pages 4.14-63 and 4.14-64 respectively, which in summary states, [t]here are no known records of collisions between golden or bald eagles and the Squaw Valley tram or cables that sit higher in elevation, within potential raptor flight paths, than the proposed gondola. Collisions between the cables, gondola, and golden or bald eagles are not expected." The comment asserts that if bird strikes occur on lift lines that do not run in the summer, these strikes may not be detected, and therefore, the lack of recorded eagle/lift line collisions at Squaw Valley may not be indicative of an absence of collisions. To address this comment, an additional literature search was conducted by the preparers of this EIR/EIR to look for documentation of raptor collisions with ski lifts or gondolas at other locations. This search found a single paper discussing mortality of the bearded vulture (*Gypaetus barbatus*) in Europe. In this paper, the authors grouped ski-lifts and powerlines together into a single category of human related mortality (Margarida et al. 2008). With ski lifts and powerlines grouped together it is not possible to determine the number of ski lift related mortalities in the study as opposed to powerlines. Powerlines are electrified, cable lines are not. In addition, the behavior and flight patterns of eagles found in the Sierra Nevada/Lake Tahoe area versus bearded vultures in Europe are different, such that the mortality of a bearded vulture as discussed in the Margarida paper is not evidence that similar mortality would occur in bald and golden eagles.

Therefore, this study alone is not a suitable source to direct conclusions on the frequency of raptor/ski lift collisions. However, the lack of scientific literature on the topic is indicative of such collisions being rare, because if raptor/ski lift collisions were frequently observed, it would be assumed that studies would be undertaken to document the issue and determine mechanisms to minimize collisions, similar to the high volume of studies on raptor/electrical utility line collisions and raptor mortalities from wind energy infrastructure. Therefore, although the lack of recorded raptor/ski lift infrastructure collisions at Squaw Valley cannot be interpreted as proof that no collisions occur, it appears to be the best data

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available to help assess this issue for the project. This potential impact is therefore considered less than significant.

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them, are possibly never identified or so infrequently identified that they generally do not appear to hit ski lift lines.

We feel a reasonable argument can be made that eagles hitting the ski lift lines is a potential impact. Mitigating for this potential impact would be tricky given that minimizing visual impacts of the gondola is also a goal.

The FEIS/R must analyze impacts to Golden and Bald Eagles of strikes to lift wires of the gondola or provide conclusive evidence that these species are not impacted.

Cumulative impacts of growth-inducement on SNYLF:

0144-53

As discussed previously, the growth inducement potential for the White Wolf development was not adequately analyzed. The fact that future residents of a potential White Wolf development would have gondola access at a nearby transfer station has the potential to make that development more likely because of that amenity. Monetary arrangements that would allow the gondola to pass over that private land could also be seen as making that development more likely.

The cumulative impact of the White Wolf development on SNYLF could be quite significant. This must be adequately evaluated and disclosed in the FEIS/R.

Other comments:

0144-54

In Exhibit 3-1 Cumulative Projects, the location of Homewood Mountain Resort "dot" is too far south.

The location must be corrected in the FEIS/R.

0144-52 cont'd, Wildlife and Aquatics (W&A)

0144-53, Wildlife and Aquatics (W&A)

See Section 5.2.3, "Growth-Inducing Impacts," in the Draft EIS/EIR regarding the potential for the proposed Gondola to influence further development. Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17. Also see responses to comments 0144-28, -47, and -49, above, which address this topic.

0144-54, Cumulative Effects (CE)

The location of Homewood Mountain Resort on Exhibit 3-1 has been corrected in the Final EIS/EIR.



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June 8, 2018

Ms. Shirlee I. Herrington
 Environmental Coordination Services
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Re: Squaw Valley-Alpine Meadows Base-to-Base Gondola Draft Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation

Dear Ms. Herrington:

This firm represents Sierra Watch in connection with the Squaw Valley-Alpine Meadows Base-to-Base Gondola Project ("Project"). On behalf of Sierra Watch, we respectfully submit these comments to help ensure that agency decisionmakers fully comply with the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 *et seq.*, and the National Environmental Policy Act ("NEPA"), 42 U.S.C. section 4321 *et seq.* Our client is deeply concerned about the far-ranging environmental impacts the Project may have on an iconic region of the Tahoe Sierra, in particular on the Granite Chief Wilderness Area and the sensitive resources in the Wilderness Area. These impacts could be even more damaging due to the Project's connection to and relationship with development in Squaw Valley and on Troy Caldwell's property ("White Wolf").

After carefully reviewing the Draft Environmental Impact Report/Statement ("DEIR/S") for the Project, we have concluded that it fundamentally fails to comply with the requirements of CEQA and NEPA in numerous respects. As described below, the DEIR/S violates these laws because it: (1) fails to provide an adequate description of the Project; (2) defers analysis of critical environmental impacts and fails to adequately analyze those impacts it does address; (3) fails to support its conclusions with substantial evidence; (4) fails to propose adequate mitigation measures for the Project's numerous significant environmental impacts; and (5) fails to undertake a sufficient study of alternatives to the Project. The Project, as described in the DEIR/S, also violates section 4(f) of the Department of Transportation Act.

0166-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

The comment quotes and cites statutes and regulations governing environmental review under CEQA and NEPA, and cites and quotes cases involving those statutes. The statutes, regulations and cases cited by the comment are noted. The comment does not identify the specific ways in which, according to the comment, the Draft EIS/EIR does not comply with these requirements. For this reason, a further response cannot be provided.

The comment states that the project is not consistent with section 4(f) of the Department of Transportation Act. For a discussion of this statute, and its applicability to the project, please see response to comment 0166-48, below.

0166-1

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cont'd

The EIR is “the heart of CEQA.” *Laurel Heights Improvement Ass’n v. Regents of University of California* (1988) 47 Cal.3d 376, 392 (“*Laurel Heights I*”) (citations omitted). It is “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return. The EIR is also intended ‘to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.’ Because the EIR must be certified or rejected by public officials, it is a document of accountability.” *Id.* (citations omitted). Likewise, NEPA requires that federal agencies “consider every significant aspect of the environmental impact of a proposed action . . . [and] inform the public that [they have] indeed considered environmental concerns in [their] decision-making process[es].” *Earth Island Institute v. U.S. Forest Service* (9th Cir. 2003) 351 F.3d 1291, 1300 (citations omitted).

CEQA also requires the lead agency to analyze a Project’s potentially significant cumulative impacts. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines § 15355¹; *see also* *Communities for a Better Env’t v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 120. An effect is “cumulatively considerable” when the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” CEQA Guidelines § 15065(a)(3). A proper cumulative impact analysis is “absolutely critical,” (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1217), as it is a mechanism for controlling “the piecemeal approval of several projects that, taken together, could overwhelm the natural environment,” (*Las Virgenes Homeowners Fed’n, Inc. v. County of Los Angeles* (1986) 177 Cal.App.3d 300, 306).

Likewise, NEPA requires that an EIS fully discuss the foreseeable cumulative impacts of the action on surrounding areas. *Earth Island Inst. v. United States Forest Serv.* (9th Cir. 2003) 351 F.3d 1291, 1306–1307 (EIS for timber sale was inadequate where it failed to consider impacts on owl species in neighboring national forest); *see also* 40 CFR § 1508.25(c) (requiring agencies to consider direct, indirect, and cumulative impacts). A meaningful cumulative impact analysis must identify and discuss the following: “(1) the area in which the effects of the proposed project will be felt; (2) the impacts that are expected in that area from the proposed project; (3) other actions – past, present, and proposed, and reasonably foreseeable – that have had or are expected to have impacts in the same area; (4) the impacts or expected impacts from these other actions; and (5) the overall impact that can be expected if the individual impacts are allowed to accumulate.” *Grand Canyon Trust v. F.A.A.* (D.C. Cir. 2002) 290 F.3d 339, 345; *see also* *Idaho Sporting Cong. v. Rittenhouse* (9th Cir. 2002) 305 F.3d 957, 973; 40 CFR §§ 1508.7, 1508.27(b)(7).

¹ 14 California Code of Regulations § 15000 *et seq.*

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Finally, CEQA requires that the EIR not only disclose a project's significant effects, but also identify ways to avoid or minimize them. Pub. Res. Code § 21002.1. An EIR generally may not defer evaluation of mitigation to a later date. CEQA Guidelines § 15126.4(a)(1)(B). Rather, an EIR must assess each mitigation proposal that is not "facially infeasible," even if such measures would not completely eliminate an impact or render it less than significant. *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1029-31. Furthermore, for every mitigation measure evaluated, the agency must demonstrate that the mitigation measure either: (1) will be effective in reducing a significant environmental impact; or (2) is ineffective or infeasible due to specific legal or "economic, environmental, social and technological factors." *Friends of Oroville v. City of Oroville* (2013) 219 Cal.App.4th 1352, 1359-61; Pub. Res. Code §§ 21002, 21061.1; CEQA Guidelines §§ 15021(b), 15364.

NEPA's mitigation requirements are similar. NEPA requires an EIS to contain a detailed discussion of all "adverse environmental effects which cannot be avoided should the proposal be implemented." 42 U.S.C. § 4332(C)(ii). In its discussion of the proposed actions and alternatives, the EIS must "[i]nclude appropriate mitigation measures" and discuss the "[m]eans to mitigate adverse environmental impacts." 40 CFR §§ 1502.14(f), 1502.16(h). The statute "require[s] that an EIS discuss mitigation measures, with 'sufficient detail to ensure that environmental consequences have been fairly evaluated.' An essential component of a reasonably complete mitigation discussion is an assessment of whether the proposed mitigation measures can be effective." *South Fork Band Council of W. Shoshone of Nevada v. U.S. Dep't of Interior* (9th Cir. 2009) 588 F.3d 718, 727 (quoting *Robertson v. Methow Valley Citizens Council* (1989) 490 U.S. 332, 352).

Where, as here, the environmental review document fails to fully and accurately inform decisionmakers and the public of the environmental consequences of the proposed action, or identify ways to mitigate or avoid those impacts, it does not satisfy the basic goals of either CEQA or NEPA. *See* Pub. Res. Code § 21061 ("The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect that a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project."); 40 CFR § 1500.1(b) ("NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken."). As a result of the DEIR/S's numerous and serious inadequacies, there can be no meaningful public review of the Project. Placer County and the Forest Service must revise and recirculate the DEIR/S in order to permit an adequate understanding of the environmental issues at stake. Further, the Forest Service must develop feasible and prudent alternatives to using parklands that are protected under section 4(f) of the Department of Transportation Act and must undertake further planning to minimize harm to any parkland that would be impacted.

This letter, along with the biological resources report by Michael White, Ph.D., (Exhibit A, henceforth "White Letter Report") constitutes Sierra Watch's comments on the DEIR/S. We

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0166-1 cont'd, Summary (S2)

0166-2, Summary (S2)

The Michael White letter is included as comment letter 0167, and detailed responses to that letter are provided.

The comment references the NOP comment letter submitted by the commenter. Placer County and the Forest Service reviewed and considered all scoping comments provided in connection with the project. The Draft EIS/EIR includes copies of the scoping comments in Appendix A and environmental topics raised therein are addressed throughout the Draft EIS/EIR. For example, the NOP comment letter requests detailed visual simulations, which are provided in Appendix D of the EIS/EIR, and requests evaluation of an alternative that moves the gondola away from the Granite Chief Wilderness, which is provided by Alternatives 3 and 4.

0166-2

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0166-2 cont'd, Summary (S2)

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cont'd

respectfully request that the Final EIR/S respond separately to each of the points raised in the technical consultant's reports as well as to the points raised in this letter.

In addition, this firm submitted comments during the scoping process for the Project. *See* SMW letter to Shirlee Herrington, dated May 23, 2016. Those comments are hereby incorporated by reference.

0166-3

I. The DEIR/S Fails to Comply with CEQA and NEPA.

A. The DEIR/S Provides an Incomplete and Unstable Description of the Project.

CEQA's most fundamental requirement is that an EIR contain an accurate and complete description of the proposed project. *See County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185; *see also* CEQA Guidelines § 15124. "[A]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." *County of Inyo*, 71 Cal.App.3d at 193. Moreover, CEQA defines a "project" as "the whole of an action." CEQA Guidelines § 15378. As explained in *McQueen v. Board of Directors of the Midpeninsula Regional Open Space District* (1988) 202 Cal.App.3d 1136, "[p]roject" is given a broad interpretation in order to maximize protection of the environment." *Id.* at 1143. This rule ensures "that environmental considerations do not become submerged by chopping a large project into many little ones—each with a potential impact on the environment—which cumulatively may have disastrous consequences." *Bozung v. Local Agency Formation Comm.* (1975) 13 Cal.3d 263, 283-84. Without a complete project description, an agency and the public cannot be assured that all of a project's environmental impacts have been revealed and mitigated.

Further, CEQA and the CEQA Guidelines mandate that an EIR include a description of "the physical environmental conditions in the vicinity of the project . . . from both a local and a regional perspective . . . Knowledge of the regional setting is critical to the assessment of environmental impacts." CEQA Guidelines § 15125(a) and (c). This requirement derives from the principle that without an adequate description of the project's local and regional context, the EIR—and thus the decision-makers and the public who rely on the EIR—cannot accurately assess the potentially significant impacts of the proposed Project.

Likewise, NEPA requires an accurate and consistent project description in order to fulfill its purpose of facilitating informed decision-making. 42 U.S.C. § 4332(2)(C). Agencies may not improperly "segment" projects in order to avoid preparing an EIS; instead, they must consider related actions in a single document. *Thomas v. Peterson* (9th Cir. 1985) 753 F.2d 754, 758. "Not to require this would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." *Id.* The Council on Environmental Quality's NEPA regulations thus require agencies to consider "connected," "cumulative," and "similar" actions within a single EA or EIS. 40 CFR § 1508.25; *Thomas*, 753 F.2d at 758-59. The use of the word "shall" in these regulations makes

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0166-3, Project Description (PD)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The comment cites case law addressing the requirements of CEQA and NEPA as they pertain to the project description and environmental setting of an EIS/EIR. The comment also describes the requirement under CEQA and NEPA for an EIS/EIR to analyze the whole of a project, rather than truncating the analysis by analyzing less than the whole. Placer County and the Forest Service are aware of, and have prepared the EIS/EIR in compliance with, these requirements. Because the comment does not provide further specifics, a further response cannot be provided.

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consideration of these three types of actions mandatory. These implementing regulations are mandatory and binding on federal agencies. *The Steamboaters v. FERC* (9th Cir. 1985) 759 F.2d 1382, 1393 n.4.

For purposes of NEPA, actions are “connected” if they are “interdependent parts of a larger action and depend on the larger action for their justification.” 40 CFR § 1508.25(a)(1). Where it would be “irrational, or at least unwise” to undertake one action without other actions, the actions are connected. *Save the Yaak Com. v. Block* (9th Cir. 1988) 840 F.2d 714, 720 (holding that road construction and timber sales had “clear nexus” and were thus “connected actions,” requiring expanded scope of review); *Thomas*, 753 F.2d at 759 (road and timber sales were “inextricably intertwined” where “[i]t is clear that the timber sales cannot proceed without a road, and the road would not be built but for the contemplated timber sales.”). An agency should analyze the impacts from two or more similar projects together “when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement.” 40 CFR § 1508.25(a)(3).

0166-4

Here, the DEIR/S fails to adequately describe the Project in three ways. First, the Project description is unstable in that it does not identify a single proposed project. Rather, the DEIR/S provides a description of four different Project alternatives and defines the Project as follows: “‘Project’ refers to the proposed Squaw Valley | Alpine Meadows Base-to-Base Gondola Project (i.e., the basic project elements as included in all action alternatives).” DEIR/S at 3-6 (emphasis added). The document further explains that “[b]ased on the analysis documented within this EIS/EIR, the Responsible Official, the Forest Supervisor for the TNF, will decide whether to select Alternative 2 (Proposed Action Alternative provided by the applicant), one of the other action alternatives, or the No Action Alternative.” *Id.* at 1-14. The EIR then proceeds to analyze the significant environmental effects of each of these alternatives, which vary significantly depending on the route location.

The California Court of Appeal recently rejected this approach as a violation of CEQA’s requirements for an accurate and stable project description. See *Washoe Meadows Community v. Department of Parks & Recreation* (2017) 17 Cal.App.5th 277, 287-90. Similar to the present case, *Washoe* involved preparation of a Draft EIR/S that evaluated five different alternatives. Although Alternative 2, the alternative that was ultimately selected, was evaluated in detail, the court found the document inadequate, and rejected arguments that such an approach should be allowed in a joint NEPA/CEQA document. The court held:

inconsistencies in a project’s description, or (as here) the failure to identify or select any project at all, impairs the public’s right and ability to participate in the environmental review process. A description of a broad range of possible projects, rather than a preferred or actual project, presents the public with a moving target and requires a commenter to offer input on a wide range of alternatives that may not be in any way germane to the project ultimately approved.

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0166-3 cont'd, Project Description (PD)

0166-4, Project Description (PD)

Alternative 2 is the project as proposed by the applicant. As such, Alternative 2 is referred to as the Proposed Action Alternative. Alternative 2 is the proposed project within the meaning of CEQA Guidelines section 15124.

In response to issues identified internally by the Forest Service and Placer County, and externally by the public during the scoping process, a reasonable range of alternatives was developed to meet most of the base project objectives. The EIS/EIR analyzes in detail the No Action Alternative and two action alternatives to the Proposed Action Alternative, Alternatives 3 and 4.

As required by NEPA, the EIS/EIR provides a comparable level of detail in the analysis of each action alternative. The alternatives described and evaluated in detail in this document include variations on alignments to provide flexibility to the Forest Service and Placer County in considering the alternative that best meets the basic project objectives while taking into account the significant or potentially significant impacts on the human and physical environments.

Chapter 2 of the EIS/EIR discusses the alternatives development process, alternatives considered in detail, and alternatives and design components considered but not evaluated further. The environmental effects and the comparative merits of each alternative are identified in the various resource analysis sections in Chapter 4, and a summary is provided in Section 2.4 of the EIS/EIR. Key issues for the comparison of alternatives are put forth in Section 2.4.1 of the EIS/EIR.

The comment cites and quotes a recent Court of Appeal decision involving CEQA: *Washoe Meadows Community v. Department of Parks and Recreation* (2017) 17 Cal.App.5th 277. In that decision, the Court of Appeal held that the EIS/EIR did not comply with CEQA because the EIS/EIR analyzed five project alternatives at an equal level of detail, without identifying any one alternative as the “proposed project” for CEQA purposes.

The Draft EIS/EIR has been prepared in a manner that is consistent with the *Washoe Meadows* decision. Chapters ES (Executive Summary), 1.0 (Introduction) and 2.0 (Description

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of Alternatives) all identify Alternative 2 as the "proposed action." That is the project proposed by the applicant, and is the "proposed project" for purposes of CEQA review. Alternatives 1, 3 and 4 are all alternatives to the proposed project, and they were analyzed for purposes of determining whether the basic project objectives could be achieved in a manner that would avoid or substantially lessen the proposed project's significant environmental effects. This approach is consistent with CEQA. (CEQA Guidelines, §§ 15126.6.)

Because the Draft EIS/EIR has been prepared as a joint document that addresses both CEQA and NEPA, the Draft EIS/EIR analyzes the proposed project and each of the alternatives at an equal level of detail, as required by NEPA. The fact that alternatives have been analyzed at an equal level of detail does not mean, however, that the Draft EIS/EIR fails to identify the proposed project. If that were the case, then it would be impossible to prepare a joint CEQA/NEPA document. In fact, CEQA expressly encourages local agencies to prepare joint CEQA/NEPA documents where the circumstances warrant this approach. (See, e.g., CEQA Guidelines, §§ 15222, 15226.)

In order to eliminate any ambiguity about the identification of the proposed project, the following sentence has been inserted into Chapters ES, 1.0 and 2.0, as shown below:

Inserted at page ES-5, at the end of section ES.3.2:

"Alternative 2 is the project, as proposed by the applicant. Alternative 2 is also the proposed project, as identified in accordance with CEQA Guidelines section 15124."

Inserted at page 1-5, at the end of section 1.4.2:

"Alternative 2 is the project, as proposed by the applicant. Alternative 2 is also the proposed project, as identified in accordance with CEQA Guidelines section 15124."

Inserted at page 2-3, at the end of section 2.2.2:

"Alternative 2 is the project, as proposed by the applicant. Alternative 2 is also the proposed project, as identified in accordance with CEQA Guidelines section 15124."

As noted by the *Washoe Meadows* Court, NEPA is structured differently than CEQA with respect to the identification of the

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proposed project and alternatives. Under NEPA, the Federal lead agency is not required to identify a "preferred alternative." CEQA, by contrast, requires the identification of a single proposed project, as well as potentially feasible alternatives to that project. (17 Cal.App.5th at pp. 288-290.) In this case, the EIS/EIR has been prepared to comply with both NEPA and CEQA.

The Draft EIS/EIR often refers to Alternatives 2, 3 and 4 as the "action alternatives." This nomenclature is used in order to differentiate these alternatives from the "No Action Alternative," also referred to under CEQA as the "no project alternative" - Alternative 1. The use of this nomenclature may have been misinterpreted by the comment as signifying that there is no, single proposed project. In fact, the EIS/EIR consistently describes Alternative 2 as the "proposed project."

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Washoe Meadows Community, 17 Cal.App.5th at 288. Similarly here, the presentation of four different alternatives with differing impacts presents a moving target and places an undue burden on the public to comment on the Project.

0166-5

Second, as set forth in further detail in Dr. White's letter, which is incorporated herein, the DEIR/S does not give sufficient information about Project alternatives' components and actions to enable an informed evaluation of the Project's environmental impacts. *See* Exhibit A at pp. 2-3. For example, the DEIR/S provides insufficient detail about construction of a "temporary" access road (and indeed, omits discussing of the access road entirely for two of the alternatives, although it appears necessary), tower sites, and associated infrastructure, leaving much to the reader's imagination. The document must be revised to include the requisite detail, which is critical to adequate evaluation and proper mitigation of significant impacts.

0166-6

Third, the DEIR/S improperly segments review of the gondola proposal from a proposed residential development and ski resort at White Wolf, which is within and/or abuts the area(s) of the Project alternatives. As described in detail in Sierra Watch's letter dated December 5, 2017 and the attachments thereto (attached hereto as Exhibit B, and fully incorporated herein by reference), the White Wolf development is inextricably linked with the gondola Project. As noted in the attached letter, a clear example of the linkage between the two projects is that the White Wolf project is proposed to include a lift to connect White Wolf to the proposed gondola's Alpine Meadows Station. It would make little sense to create a ski resort and development that does not connect to the surrounding land uses and amenities at Squaw and Alpine. Therefore, under both CEQA and NEPA, the gondola and the White Wolf developments should have been reviewed in a single EIR/EIS.

B. The DEIR/S's Analysis of and Mitigation for the Project's Environmental Impacts Are Inadequate.

0166-7

The evaluation of a proposed project's environmental impacts is the core purpose of an EIR. *See* CEQA Guidelines § 15126.2(a) ("[a]n EIR shall identify and focus on the significant environmental effects of the proposed project"). Likewise, NEPA requires that federal agencies "consider every significant aspect of the environmental impact of a proposed action . . . [and] inform the public that [they have] indeed considered environmental concerns in its decision-making process." *Earth Island Institute*, 351 F.3d at 1300 (citations omitted). Each statute also requires that the EIR/S identify measures that would effectively mitigate a proposed project's significant effects on the environment. Pub. Res. Code § 21002.1(a); *Robertson*, 490 U.S. at 352-352. As explained below, the DEIR/S fails to analyze the Project's numerous environmental impacts, including those affecting biological resources, water quality and hydrology, noise, transportation, air quality, and climate change. It also fails to identify effective mitigation measures for the Project's significant effects.

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0166-4 cont'd, Project Description (PD)

0166-5, Project Description (PD)

The project description and analysis provided in the Draft EIS/EIR was conducted with equal consideration both of the proposed project (Alternative 2) and of all alternatives. In certain respects, the proposed project (Alternative 2) closely resembles Alternatives 3 and 4. In those instances, where specific detail was omitted for Alternatives 3 or 4, this detail was intentionally omitted to minimize redundancy in the Draft EIS/EIR. Much of the description of various project components or environmental analysis would not differ appreciably between the proposed project (Alternative 2) and the action alternatives (Alternatives 3 and 4) (e.g., description of the temporary construction access route).

The additional detail requested by the comment related to the temporary construction access route for Alternatives 3 and 4 was not provided in Chapter 2 of the Draft EIS/EIR because this component of the project would not differ considerably between action alternatives. The exact alignment of the temporary construction access route under Alternative 2 would differ from Alternatives 3 and 4 (please refer to Exhibits 2-2, 2-9 and 2-13 in the Draft EIS/EIR), but the narrative description of the temporary construction access route provided on page 2-11 is applicable for all action alternatives.

For example, the chapter addressing impacts to vegetation (Section 4.12) includes the following passage: "Temporary impacts would occur where natural vegetation would be removed during the construction process; however, the disturbance is temporary, and the location would be restored to pre-disturbance vegetation consistent with Resource Protection Measures (RPMs). Any vegetation that overlapped with an area of proposed construction activity was typically considered removed and included in the permanent or temporary impact category based on the construction activity identified for the site." (Draft EIS/EIR, Section 4.12.2.1, page 4.12-17).

This narrative description of impacts associated with the construction project is true for both the proposed project (Alternative 2) and the action alternatives (Alternatives 3 and 4).

The differences to the alignment of the temporary construction access route amongst the proposed project and alternatives

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were taken into account in identifying the impacts of each. In particular, the EIS/EIR identifies, in each instance, the area of disturbance associated with the construction of the temporary construction access road, and evaluates the significance of that impact. The location and area of disturbance differs in each case due to the differences in alignment of this road under the proposed project and each alternative. For example, in Section 4.12, "Vegetation", the EIS/EIR quantifies each alternative's impact on vegetation types. The EIS/EIR distinguishes between permanent impacts on vegetation, and temporary impacts associated with construction. The type and quantity of temporary vegetation impacts differs depending on the alternative being analyzed. To cite an example, the Draft EIS/EIR identifies the following temporary impacts with respect to "coniferous woodland": 0.16 acres under the proposed project (Alternative 2); 0.03 acres under Alternative 3; and 0.27 acres under Alternative 4.

For further information, please see Tables 4.12-3, 4.12-5 and 4.12-7. Note that the EIS/EIR further differentiates between impacts on private and public lands. The totals set forth above are the total, temporary impacts to coniferous woodland, regardless of whether the land is public or private.

The comment requests additional information regarding impacts associated with tower sites. The EIS/EIR provides sufficient information with respect to impacts from constructing towers. The description of the proposed project (Alternative 2) states: "A total of 35 towers would be installed along the gondola alignment under Alternative 2, with 24 on private land and 11 on NFS lands. The project applicant has provided preliminary tower locations that are used in this EIS/EIR; however, exact locations and designs for each tower have not been determined at this time. Determination of exact tower placement will be part of final project engineering and design once a single alternative has been selected (i.e., if an alternative is approved at the conclusion of the NEPA/CEQA process). On NFS lands, final engineering and design will require consultation with the Forest Service hydrologist/soil scientist and other technical specialists as appropriate. Placer County will have a similar role in final engineering and design on non-NFS lands. Four "tower zones" (Zones A, B, C, and D) have been delineated in Exhibits 2-3, 2-4, 2-5, and 2-6 to highlight areas with similar site conditions for tower placement. Details about tower construction are discussed below." (Draft EIS/EIR, page 2-12).

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As this passage indicates, the exact placement of each tower has not been determined for the proposed project. The same is true with respect to Alternatives 3 and 4. Table 2-1 provides a summary of the design characteristics of each alternative, including the number of towers. (See Draft EIS/EIR, pp. 2-27-2.28.)

Exact placement of towers requires engineering the alignment approved by the County and Forest Service. At this time, it is not known whether the County and Forest Service will approve the proposed project, approve an alternative alignment, or disapprove the project (in effect, approving "no project"). Preparing project plans at an engineering level of detail is both costly and time consuming. Such expense would be wasted in the event the County and Forest Service do not approve the project as proposed. Moreover, final engineered plans are not needed in order to identify the impacts associated with the project. Rather, sufficient information must be provided to assess the project's impacts. Such information typically consists of conceptual or preliminary plans, with engineering details to follow if and when the agency approves the project. In this case, the applicant has provided sufficient information to enable the County and Forest Service to quantify the impacts of constructing towers. In particular, the EIS/EIR discloses the number and general location of towers under each alternative, while acknowledging that during project design the locations may be adjusted either to meet engineering specifications, or to avoid sensitive resources if it is feasible to do so.

0166-6, Project Description (PD)

40 CFR 1508.25(a)(1) states that, for NEPA purposes, actions are connected if: (i) they automatically trigger other actions which may require environmental impact statements; (ii), cannot or will not proceed unless other actions are taken previously or simultaneously; or (iii), are interdependent parts of a larger action and depend on the larger action for their justification.

With respect to CEQA, the Guidelines define "project" to mean "the whole of an action" that may result in either a direct or reasonably foreseeable indirect physical change in the environment. (Guidelines, §§ 15378, subd. (a).) The following test is used to determine whether the "whole of an

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action" analyzed in an EIR must include a future phase or other action connected to the proposed project: "[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 396 ("Laurel Heights I").) The "key" element of this test is causation; the issue is whether the other, related action will foreseeably proceed as a consequence of the project under review. (See *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1225; *Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.4th 266, 282.)

The White Wolf Project would be located on the privately owned land located between Squaw Valley and Alpine Meadows. The White Wolf Project, as proposed, consists of a 38-lot subdivision, a clubhouse/lodge, a chairlift, and seasonal recreational facilities.

The White Wolf Project and the gondola temporally overlap. Both projects are currently proposed. Because the White Wolf Project is located on private land, the project does not require approval from the Forest Service. The project does, however, require approval by Placer County. The environmental review process for White Wolf is in the early stages of review as compared to the gondola. Although an application has been submitted, the County has not yet prepared a Draft EIR for the project. The Draft EIS/EIR for the gondola acknowledges the status of the White Wolf Project. In particular, the White Wolf Project is noted in the "cumulative project" list. (See Draft EIS/EIR, Table 3-3, project #9.)

The White Wolf and gondola project also geographically overlap. All three gondola alignments traverse the Caldwell property. Crossing over the Caldwell property must occur if the route of the gondola is to avoid publicly owned lands in the Granite Chief Wilderness area. (See Draft EIS/EIR, Exhibit 2-1.) In addition, under Alternatives 3 and 4, the gondola will include an "Alpine Meadows" mid-station located on the Caldwell property. If Alternatives 3 or 4 are approved, and if the White Wolf Project is also approved, only residents and guests of the White Wolf Project will be able to board or exit the gondola at this mid-station.

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Although the gondola and White Wolf projects are related to one another in this manner, they are not considered part of the same project under either NEPA or CEQA. The gondola project does not depend on approval of the White Wolf project in order to proceed. Rather, the fundamental purpose or objective of the gondola project is to provide a connection between Alpine Meadows and Squaw Valley. The existence of a mid-station on the Caldwell property is in service of that purpose or objective; it is not an end in itself.

Similarly, the approval of the gondola does not mean that the White Wolf Project will necessarily follow. The White Wolf Project is undergoing separate environmental review. Whether, and on what terms, the White Wolf Project goes forward is unknown at this time. The approval of the gondola makes that eventuality neither more nor less probable. Neither can plausibly be characterized as a future phase of the other. Each may proceed independently of the other. These factors indicate that the gondola and the White Wolf Project are not part of the same development scheme.

The Draft EIS/EIR acknowledges that the White Wolf Project has been proposed, and the impacts of that project are considered in the context of the analysis of the gondola project's cumulative impacts. In this fashion, the EIS/EIR ensures that the impacts of the gondola project are understood in the context of other potential development that is not functionally or causally tied to the gondola, but that is nevertheless reasonably foreseeable.

0166-7, Summary (S2)

The comment states that the Draft EIS/EIR fails to analyze impacts to biological resources, water quality and hydrology, noise, transportation, air quality, and climate change, as explained in detailed comments below. See responses to these detailed comments below that address these resources.

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0166-8

1. The DEIR/S Fails to Adequately Analyze or Mitigate the Project's Impacts on Biological Resources.

The DEIR/S's analysis of Project-related impacts to biological resources contains numerous deficiencies that must be remedied in order for the public and decision-makers to fully understand the Project's impacts. The report prepared by Dr. Michael White provides detailed comments on the shortcomings in the DEIR/S impacts analyses for vegetation, botany, wildlife and aquatic species and wetlands. *See* White Letter Report, attached as Exhibit A. We incorporate the White Letter Report into these comments. Some of the DEIR's most troubling errors include: (1) an inadequate description of the existing setting; (2) an inadequate description of the Project; (3) an incomplete analysis of impacts; and (4) deficient mitigation measures. These issues, and other deficiencies, are discussed in greater detail in the White Letter Report.

In summary, as described in Dr. Michael White's Letter Report, the DEIR/S's failure to accurately describe the proposed Project contributes to the document's deficient analysis of environmental impacts. *See* White Letter Report at __. Because the concrete details of the construction and operation of the resort are unknown, its environmental impacts cannot be accurately analyzed, nor can effective mitigation be identified. The uncertainty surrounding the Project leads inevitably to deferred analysis and mitigation. Time and again, the DEIR/S states that impacts will be avoided through Resource Protection Measures ("RPM") that call for additional review and analysis down the road.

For example, the DEIR/S acknowledges that the Project would result in direct and indirect effects to the federally endangered Sierra Nevada Yellow-legged Frog, such as loss of individuals of the species or of occupied habitat. DEIR/S 4.14-52, 4.14-70, and 4.14-86. The DEIR/S vaguely refers to potential impacts to the species that could occur through the release of chemicals, elevated construction noise, and increased human activity. White Letter Report at __. However, the DEIR/S fails to determine the extent and severity of those impacts. White Letter Report at __. Merely stating that an impact will occur is insufficient; an EIR must also provide "information about how adverse the adverse impact will be." *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831. This information, of course, must be accurate and consist of more than mere conclusions or speculation. *Id.* The DEIR/S's analysis of impacts to the Sierra Nevada Yellow-legged Frog and other biological resources fails to fulfill this mandate in several instances.

0166-9

2. The DEIR/S Fails to Adequately Analyze or Mitigate the Project's Significant Visual Impacts.

Under CEQA, it is the state's policy to "[t]ake all action necessary to provide the people of this state with ... enjoyment of aesthetic, natural, scenic, and historic environmental qualities." Pub. Res. Code § 21001(b). Thus, state courts have recognized that aesthetic issues "are properly studied in an EIR to assess the impacts of a project." *The Pocket Protectors v. City of*

0166-8, Wildlife and Aquatics (W&A)

The comment summarizes more detailed comments provided in letter 0167. See detailed responses to biological comments therein.

0166-9, Visual Resources (VR)

The comment is an introductory statement for more specific points related to visual impacts that follow and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

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0166-9 cont'd, Visual Resources (VR)

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Sacramento (2004) 124 Cal.App.4th 903, 937 (overturning a mitigated negative declaration and requiring an EIR where proposed project potentially affected street-level aesthetics). NEPA is similarly unequivocal that an EIS must provide decisionmakers and the public with “a full and fair discussion of significant environmental impacts,” including impacts to “aesthetics.” CFR §§ 1502.1, 1508.8.

The Project would construct an aerial gondola more than two miles long consisting of 35 towers, some exceeding 50 feet in height, two base terminals, and two 24-foot by 84-foot mid-stations—traversing a pristine granite ridgeline at the crest of the Sierra Nevada. The Project would also install eight Gazex exploders at Alpine Meadows ski resort. DEIR/S at 2-10 to 16. The scenic value of this ridgeline is obvious to anybody who has hiked the popular Five Lakes Trail and is almost certainly among the reasons for its inclusion in the 1984 Granite Chief Wilderness designation.

Unfortunately, the DEIR/S employs a viewshed analysis that largely ignores the largest components of the Project and fails to adequately analyze or disclose the harm this infrastructure would inflict on this treasured landscape.

(a) The DEIR/S's Viewshed Analysis Fails to Analyze the Visual Impacts of the Gondola Mid-Stations.

0166-10

As a preliminary matter, the DEIR/S employs an inappropriate method to analyze the Project's impacts on viewsheds. The DEIR/S utilizes high-resolution topographical mapping data and geographical information system technology to define the Project viewshed—the “zone of potential visibility” where project components would be within line of sight of potential users. DEIR/S at 4.2-14. Although a properly conducted viewshed analysis can be a powerful tool for analysis, the DEIR/S applies the technique in a manner that serves to obscure and minimize rather than disclose and highlight the Project's visual impact.

The viewshed analysis is misleading because it focuses entirely on the visibility of gondola towers within the viewshed, while failing to account for the proposed gondola mid-stations in determining the “zone of potential visibility.” DEIR/S at 4.2-14. Specifically, the DEIR/S defines the “zone of potential visibility” by extrapolating the relative size of the characters and viewing distance on the Snellen eye chart, the standard vision test used by ophthalmologists and the DMV, to a gondola tower. Id.

This methodology is misleading for several reasons. First, it falsely equates the ability to tell the difference between an O and P on an eye chart at 20 feet to the ability to tell the difference between a tree and a lift tower at several miles. The DEIR/S presents no evidence that these are equivalent visual tasks. Each of the “letters” on a Snellen eye chart is actually a carefully designed optotype drawn in a style and chosen for its equivalent readability to the other optotypes on the line and chart. See, Exhibit C, “Visual Acuity Testing: from the Laboratory to

0166-10, Visual Resources (VR)

The viewshed analysis conducted in Section 4.2, “Visual Resources” utilizes point data for gondola towers instead of mid-stations or terminals because the gondola towers would be the tallest pieces of infrastructure installed along the gondola line. As such, the gondola towers represent the most conservative estimation of the highest level of potential visibility for gondola infrastructure. Had the Zone of Potential Visibility been calculated using the point data of the gondola's mid-stations or terminals, the Zone of Potential Visibility would be dramatically smaller because the height of the mid-stations and terminals is much less than that of towers. Specifically, the mid-stations and terminals are approximately 30 feet tall, whereas the towers are approximately 53.5 feet tall as noted by the comment. Please refer to page 4.2-14 of the Draft EIS/EIR, which states: “While the definition provided above for the background distance zone states that line, form, and texture of landscapes are generally not discernable or recognizable beyond 4.3 miles, the upper range for potential visibility was increased due to the large mean height and mass of the proposed gondola towers, their cross-arms and sheave assemblies.”

The comment states: “... the viewshed analysis focuses on the visibility and legibility of structures that are, conservatively, 1/100th the volume of the mid-stations.” If the Zone of Potential Visibility was calculated using the point data of the structures along the gondola line with the greatest volume, rather than the structures with the greatest height, the Zone of Potential Visibility would be much smaller than it is estimated to be in the Draft EIS/EIR. The analytic approach set forth in the Draft EIS/EIR is conservative because it focuses on the structures with the highest Zone of Potential Visibility.

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the Clinic.” The DEIR/S presents no evidence that a gondola tower, with a distinct inorganic form, bears the same relationship to a tree as the optotypes on a Snellen chart do to each other. This is particularly important when, as with Alternatives 2, 3 & 4, many of those towers would be silhouetted against the sky in remote areas with high visual sensitivity levels. DEIR/S at Appendix D.

Second, the viewshed analysis entirely fails to consider the visibility of the single largest components of the proposed gondola system—the mid-stations. DEIR/S at 4.2-14. Each mid-station, which would be 24-feet wide, 84-feet long, and 30-feet tall, would be much larger than a simple fixed-grip lift terminal. DEIR/S at 2-11. By contrast, the lift towers that are the focus of the viewshed analysis would measure approximately 3.3-feet in diameter by 53.5-feet tall. DEIR/S at 4.2-14 & 4.2-14 fn. 3. Thus, by focusing on the lift terminals, the viewshed analysis focuses on the visibility and legibility of structures that are, conservatively, 1/100th the volume of the mid-stations.² The viewshed analysis cannot reasonably ignore the large mid-stations because both of these structures would be perched in highly visible locations atop ridgelines. DEIR/S at Exhibit 2-2. Analyzing the mid-stations in the viewshed analysis is also essential to a true understanding of the visual impacts of Project Alternatives 3 and 4, as both would locate at least one mid-station in a highly visible location. DEIR/S at Exhibits 2-9 & 2-13. Because the viewshed analysis focuses on the visibility of lift towers while ignoring the visibility of the mid-stations, structures that would be located on highly visible ridgelines and that would be 100 times larger by volume, it presents decisionmakers and the public with a dramatically minimized depiction of the visual impacts proposed gondola infrastructure.

0166-11

(b) The DEIR/S Fails to Include a Simulation Showing Impacts to Views Experienced by Winter Backcountry Users.

The DEIR/S selected 21 viewpoints in an attempt to “accurately represent the overall visual impacts that may occur with implementation of any of the action alternatives.” DEIR/S at 4.2-18. And it claimed that viewpoints “that experience a high viewing frequency or viewing duration were determined to be most representative.” *Id.*

Unfortunately, the DEIR/S fails to include or analyze any viewpoint of the proposed Project infrastructure from Munchkins Ridge, the ridgeline that runs to the North and East of Scott Peak. DEIR/S at Exhibit 4.2-3. The failure to analyze viewpoints from this ridgeline is inexcusable, as it clearly meets the DEIR/S stated goal of analyzing views “from highly frequented or prominent public areas, visually sensitive vistas, and areas with a high frequency of viewers.” DEIR/S at 4.2-3.

² Volume of the mid-stations [$h(30') \times w(24') \times l(84')$] = 60,430 cubic feet. Volume of lift tower (assuming a 25' crossbar) [$\{\pi r(1.5)^2 \times h(53.75)\} + [\pi r(1.5)^2 \times h(25)]$] = 556.65 cubic feet. $60,430 \div 556.65 = 108.65$, or less than 1/100th the volume.

0166-10 cont'd, Visual Resources (VR)

0166-11, Visual Resources (VR)

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection of 16 representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these locations (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road) experience widely varying conditions between the winter and summer months. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be simulated for the purposes of this EIS/EIR. Visual simulations of each alternative could, in theory, be prepared from an infinite number of potential locations, under a large number of visual scenarios (different seasons or different times). The cost of preparing a large number of simulations would vastly outweigh the incremental value of preparing them, over and above the number of simulations that have already been provided. The number of simulations to prepare, the viewpoints, and the conditions reflected in those simulations, require the exercise of judgment regarding the number of simulations required in order to be representative, balanced against the cost and incremental value of additional simulations. In light of these considerations, the Forest Service and County focused on preparing a representative number of simulations focusing on highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. Existing vegetative screening is expected to reduce

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considerably the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. The analysis does not, however, take into account potentially obscuring features, such as vegetation. For this reason, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

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According to the DEIR/S's own viewshed analysis, Munchkins Ridge is within the zone of potential visibility. DEIR/S at Exhibit 4.2-4 and Google Earth image attached as Exhibit D. This ridgeline is 1-2 miles from the proposed gondola infrastructure and within 1-2 miles of Project mid-stations and towers, well within the 4.39-mile range where the DEIR/S found that the Project would be visible. DEIR/S at 4.2-12.

Munchkins Ridge features visually sensitive vistas and is highly frequented, as evidenced by guided tours of the area by Squaw Valley at \$859 per group. , <http://squawalpine.com/skiing-riding/alpenglow-guided-backcountry-tour> and Exhibit E, Squaw Valley Alpenglows Backcountry Tours webpage. The ridge defines the top of an area that Squaw Valley describes as "the popular backcountry zone known as "Munchkins" off Scott Peak." *Id.* The same zone is regularly skied by unguided backcountry users, who access it both from the Lakeview lift at Alpine Meadows and by climbing from the neighborhood at its base. Considering the effort involved to access the ridge and the generally unspoiled views looking north from it, the backcountry users of Munchkins would have a "high sensitivity toward the natural appearing and undeveloped landscape visible from this viewpoint," much like the hikers and skiers identified in viewpoints 9-16. DEIR/S at 4.2-6, 4.2-7. Finally, because Munchkins Ridge is the main route of access for skiers accessing the terrain from Lakeview, and represents a common place to stop, enjoy the view, transition to downhill mode, and eat between laps, people's exposure to the degraded views would be extended.

Because the DEIR/S's viewpoint analysis forms the basis of its significance determinations concerning visual resources, the failure to include this key data point undermines the document's fundamental conclusions. This omission is particularly acute for Alternatives 3 and 4, where the Forest Service claimed that adverse visual impacts would be minor and could be mitigated through selected RPMs.

(c) The DEIR/S's Claims that the Project's Impacts Related to Consistency with Local and Federal Plans and Visual Resource Policies Would Be Mitigated to Less-Than-Significant Levels Are Unsupported.

As acknowledged in the DEIR/S, the proposed Project conflicts with policies in applicable federal, state and local regulations designed to protect ridgelines and hilltops and to preserve viewsheds. DEIR/S at 4.2-23. Specifically, the proposed Project (Alternative 2) would be inconsistent with Placer County General Plan Policy 1.K.1, which calls for development *not* to be located along ridgelines and steep slopes. The proposed Project, which would locate the gondola route along the ridge, would directly conflict with this policy.

The DEIR/S acknowledges this inconsistency and concludes that Alternative 2 could result in adverse effects under NEPA and significant impacts under CEQA. DEIR/S at 4.2-25 and 4.2-26 respectively. Yet, the document then concludes that, with implementation of various

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0166-11 cont'd, Visual Resources (VR)

0166-12, Visual Resources (VR)

CEQA requires only that inconsistencies with general plan goals and policies be identified and discussed (CEQA Guidelines, §§15125, subd. [d]). The Draft EIS/EIR does this (please refer to Draft EIS/EIR, pp. 4.2-23 thru -24). Further, Policy 1.K.1 was not adopted as a threshold of significance under CEQA, so it does not dictate a new significant impact finding as to Impact 4.2-1 (Consistency with Federal, State and Local Regulations). Thus, a new significant impact finding is not warranted under CEQA and recirculation of the document is unnecessary.

The Final EIS/EIR has been updated to further clarify that all alternatives would be, to a certain degree, inconsistent with Placer County General Plan Policy 1.K.1 which states: "The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

- a. Avoids locating structures along ridgelines and steep slopes;
- b. Incorporates design and screening measures to minimize the visibility of structures and graded areas;
- c. Maintains the character and visual quality of the area." (Placer County General Plan, p. 39)."

By their very nature, gondolas and ski lifts must extend along steep slopes to achieve their purpose. Given that the gondola is intended to connect the two ski resorts, all three action alternatives must also cross over the ridgeline which separates the two valleys. As such, it is not possible for the gondola to avoid slopes and ridgelines, but rather the design must rely on other means to screen and minimize the visible impacts of the infrastructure. Specifically the design of each alignment takes advantage of existing topography and vegetation to shield views as well as incorporates design standards via RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3. It is acknowledged that the Alternative 2 alignment traverses a lengthy distance of the sparsely vegetated ridgeline, whereas Alternatives 3 and 4 cross over the ridgeline in one discrete location before diving down into Catch Valley, thus limiting the visible impacts of the Alternative 3 and 4 gondola infrastructure

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to a greater extent than under Alternative 2. With these design measures in place, all three gondola alignments achieve consistency with the goals and policies of Policy 1.K.1.

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RPMs, the significant impact would be reduced to less-than-significant levels. *Id.* This conclusion is not supported by substantial evidence. The Project's plain inconsistency represents a significant, unavoidable impact that is not mitigated by the proposed RPMs.

In fact, the RPMs fail entirely to address the Project's inconsistency with applicable policies. For instance, REV-1, REV-2, SCE-1, and SCE-7 call for additional agency review of the Project alignment and design but lack any performance criteria to address location of the Project along the highly visible ridgeline. DEIR/S, Appendix B at B-3. Similarly, RPMs SCE-2 and SCE-4 vaguely provide that the Project should be designed and located to reduce visual contrast. *Id.* at B-7. These measures do not actually reduce conflicts between the Project and the General Plan. Nor does the DEIR/S make any attempt to evaluate the effectiveness of the RPMs. The DEIR/S should be revised to disclose the Project's inconsistencies with the General Plan as significant unavoidable impacts.

0166-13

(d) The DEIR/S Fails to Adequately Analyze Impacts Resulting from Project Lighting.

The DEIR/S underestimates the Project's light pollution impacts. The DEIR/S acknowledges that the all of the action alternatives associated with the Project would cause visual impacts during nighttime hours. DEIR/S at 4.2-31, 4.2-37, and 4.2-45. However, the DEIR/S claims that the effects of night lighting would be limited to the period between sunset and closing of the resort. DEIR/S at 4.2-31. The DEIR/S analysis thus fails to address use of the gondola for transporting patrols on avalanche operations and/or distributing staff to work stations around the resort. These routine operations involve nightly transport until 7:00 am for much of the operating season (Nov. 30-Feb. 8, March 11-22). The revised DEIR/S should analyze the potentially significant impacts associated with any nighttime operation of the gondola.

0166-14

3. The DEIR/S Fails to Adequately Analyze or Mitigate the Project's Impacts on Hydrology and Water Quality.

(a) The Project Study Area Is an Especially Fragile Ecosystem.

The DEIR/S acknowledges the potential for severe hydrologic and water quality impacts but stops short of providing the analysis of these impacts required by CEQA and NEPA. The Project study area occurs upstream of two tributaries to the middle Truckee River, Squaw Creek, and Bear Creek. DEIR/S at 4.17-2 and DEIR/S Figure 4.17-1. Within the Alternative 2 study area, there are a total of 1.65 acres of aquatic resources. DEIR/S at 4.17-5. Within Alternative 3, there 3.62 acres, and Alternative 4, there are 4.13 acres of aquatic resources. *Id.* These acreages are estimates only, as a formal delineation of jurisdictional features associated with each action alternative has not been conducted to confirm the exact boundaries of waters and wetlands. *Id.*

0166-12 cont'd, Visual Resources (VR)

0166-13, Visual Resources (VR)

Impacts resulting from project lighting are analyzed and disclosed in the EIS/EIR. The Draft EIS/EIR states on page 4.2-31 that, "... night lighting fixtures would be installed only at terminals, mid-stations, and operating buildings to allow for *maintenance outside of normal operating hours, and to prepare for daily operations*" (emphasis added). It is therefore acknowledged in the Draft EIS/EIR that lighting fixtures may be used outside of normal operating hours for maintenance and/or daily operations purposes. Such night lighting would not result in significant visual impacts because the project would incorporate RPM SCE-8, which provides:

Prior to Improvement Plan approval, a detailed lighting and photometric plan shall be submitted to the Placer County Development Review Committee (DRC) for review and approval, which include the following:

A) The site lighting plan shall demonstrate compliance with the Squaw Valley General Plan and Land Use Ordinance (SVGPLUO), the Alpine Meadows General Plan, and the Placer County Design Guidelines. The night lighting design shall be designed to minimize impacts to adjoining and nearby land uses. No lighting is permitted on top of structures.

B) Building lighting shall be shielded and directed downward such that the bulb or ballast is not visible. Lighting fixture design shall complement the building colors and materials and shall be used to light entries, soffits, covered walkways and pedestrian areas such as plazas. Roof and wall pack lighting shall not be used. Lighting intensity shall be of a level that only highlights the adjacent building area and ground area and shall not impose glare on any pedestrian or vehicular traffic.

C) Landscape lighting may be used to visually accentuate and highlight ornamental shrubs and trees adjacent to buildings, monument signs, and in open spaces. Lighting intensity shall be of a level that only highlights shrubs and trees and shall not impose glare on any pedestrian or vehicular traffic. It has been determined that the County's guidelines are more stringent than the Forest Service BEIG guidelines for lighting, and as such, the County standards will provide the basis for lighting related approvals. The photometric plan shall be submitted to the Forest Service for review and comment.

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0166-14, Hydrology and Water Quality (H&WQ)

The comment states that the Draft EIS/EIR states that the project may have severe impacts on hydrology and water quality. This statement is incorrect. Rather, the Draft EIS/EIR states that construction-related impacts on hydrology and water quality are "potentially significant." With the incorporation of RPMs identified in the EIS/EIR, the impact is considered insignificant. In addition, during project operations, impacts to hydrology and water quality are identified as insignificant.

The comment states that the Draft EIS/EIR does not provide an adequate analysis of hydrology and water quality impacts under CEQA and NEPA. The comment quotes portions of the Draft EIS/EIR that describe potential effects on water quality impairment from erosion and sedimentation. The comment also identifies discussion from the Draft EIS/EIR that identifies the TMDL for the Truckee River and Squaw Creek and the requirement that the project not result in an exceedance of the TMDL load allocations for Squaw Creek and Bear Creek, both tributary to the Truckee River. Both of these plans were reviewed and relied upon in the preparation of the Draft EIS/EIR. (See Draft EIS/EIR, p. 8-19.) The Draft EIS/EIR recognizes that the watershed is sensitive, and that there is a potential for erosion and sedimentation to impair water quality. The Draft EIS/EIR concludes, however, that the project, as mitigated, will not exacerbate water quality problems.

The comment is correct in stating that a USACE wetland delineation has not been completed for the project. A wetland delineation would be required if, after selection of a project alternative and completion of project design, impacts to wetland resources cannot be fully avoided, consistent with the process described in RPM BIO-26. A wetland delineation would be prepared and reviewed by USACE and CDFW prior to project implementation, in anticipation of permit acquisition.

The hydrology and water quality analysis that has been conducted for the project in the Draft EIS/EIR analyzes the effects on water quality for the alternatives and uses the best available information related to the project as described in Section 4.17.2.1, "Methods and Assumptions." Based on this information and the application of provisions in the RPMs to the project, the Draft EIS/EIR found that the project would have adverse and mitigated effects under NEPA, and less than

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significant effects with RPMs as mitigation under CEQA. These effects determinations included consideration of whether the project, including RPMs, would be sufficiently protective of the TMDLs for the Truckee River and Squaw Creek. Also see responses to comment letter 0185 from the Lahontan Regional Water Quality Control Board (LRWQCB), which describe the project's compliance with LRWQCB policies, standards, and regulations.

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0166-14 cont'd, Hydrology and Water Quality (H&WQ)

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Several unnamed seasonal (ephemeral and intermittent) tributary streams cross the study area. DEIR/S at 4.17-5. Perennial streams cross the lower portion of the northern face of the alignments on Squaw Valley and southern face along Alpine Meadows Road. Bear Creek, a perennial stream that flows from Alpine Meadows to the Truckee River, is near the Alpine Meadows base area. Riparian scrub habitat adjacent to Bear Creek was mapped within the study area, on the southern segment of the action alternatives prior to the lower terminal at Alpine Meadows. Areas adjacent to Bear Creek exhibit typical alpine riparian floodplain with alder scrub-shrub habitat. *Id.* Adjacent natural ponds include Barstool Lake, which is located northwest of the base of Alpine Meadows, and just south of the Alpine Meadows mid-station proposed under Alternative 2, and an unnamed pond adjacent to Barstool Lake. *Id.* Other naturally occurring lacustrine features in the Project vicinity include Five Lakes, which is a cluster of five small lakes located west of the Alternative 2 alignment. Naturally occurring ponds provide habitat for Sierra Nevada yellow-legged frog and long-toed salamander. *Id.* A small fen exists on the southern exposure of Skunk Rock (near the northern mid-station for Alternatives 2 and 3), where several ephemeral tributaries convene. The southern portion of the Project site descends over a mountain flank spring seep, typical of alpine wetland features. *Id.*

As the above description makes clear, the Project study area is an especially fragile ecosystem when it comes to the potential for water quality impairment. The steep topography, geology, mountain climate, geomorphic processes, historic land use, and vegetation cover conditions in the Bear Creek watershed in Bear Creek Valley and the Squaw Creek watershed in Olympic Valley currently contribute to erosion and sedimentation problems, including stream channel instability and sedimentation impacts to water quality. DEIR/S at 4.16-1. Sediment source estimates from the Squaw Creek watershed total maximum daily load (TMDL) studies by Lahontan Regional Water Quality Control Board (Lahontan Water Board) indicate that approximately 60 percent of the sedimentation affecting Squaw Creek is related to human disturbances. *Id.* Most of the sediment originates from upslope natural and disturbed areas (Undisturbed [37 percent], Dirt Roads [25 percent], and Graded Ski Runs [24 percent]).³ *Id.*

In order to protect water quality in the area, the Lahontan Water Board sets forth total TMDL for sediment load along the Truckee River and Squaw Creek. DEIR/S at 4.17-8, 9. While the Squaw Creek TMDL specifically targets sediment that is deposited on the river bed, the Truckee River TMDL targets finer sediment that moves in suspension to downstream areas. *Id.* In this regard, the DEIR/S explains that actions taken in tributaries to Squaw Creek or Bear Creek must be sufficiently protective to ensure that they do not contribute to an exceedance of the load allocation for subwatersheds of the Truckee River. DEIR/S at 4.17-14.

³ The TMDL is the amount of the pollutant that the waterbody can receive and still be in compliance with water quality objectives. The TMDL is also a plan to reduce loading of a specific pollutant from various sources to achieve compliance with water quality objectives. DEIR/S at 4.17-10.

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(b) The DEIR/S's Conclusion that the Project Would Not Degrade Water Quality Is Not Supported by Evidence.

The DEIR/S addresses the Project's potential to violate water quality standards in two sections: Impact 4.17-1 (construction) and Impact 4.17-2 (long term implementation). DEIR/S at 4.17-22; 4.17-23; 4.17-27; 4.17-32; 4.17-41; 4.17-43; 4.17-48; 4.17-50. The document first provides an overview of the nature of the analysis that should be undertaken to evaluate the context and intensity of the Project's impacts on water quality. Factors to be addressed include the creeks' hydrologic function, stream health, rate and amount of runoff, stream sedimentation (both suspended and sand-size portion of bedload sediment), and slope stability. Part of this evaluation should address TMDL adopted for sediment in the creeks. DEIR/S at 4.17-14; 4.17-22; 4.17-23; DEIR/S at 4.17-27. As the DEIR/S acknowledges, given the sensitivity of Bear Creek and Truckee River and their upland environs to erosion and sedimentation, even small amounts of sedimentation could have harmful downstream effects. DEIR/S at 4.17-29.

The potential for the Project to degrade water quality in this sensitive environment warrants a thorough impact analysis. Yet, other than identifying the amount of land and vegetation that would be disturbed by each of the Project Alternatives (4.17-28 and 4.17-33), the DEIR/S provides only a vague discussion of the types of impacts that could theoretically occur. Indeed, the DEIR/S's analysis could have been written for any project in any location; it never actually addresses the impacts *this Project in this location* would have on the creeks' hydrologic function, stream health, rate and amount of runoff, stream sedimentation, and slope stability.

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The DEIR/S makes no attempt to evaluate the extent of erosion that could occur during the Project's construction or operation. It does not identify the increase in impervious surfaces that would accompany the Project. It fails to quantify the rate and amount of stormwater discharge that could ultimately make its way into nearby waterbodies including Squaw Creek and Bear Creek. It makes no attempt to identify the potential increase in suspended sediment loads from accelerated erosion during construction. Moreover, although the DEIR/S acknowledges the important role that steep slopes play in erosion and runoff into waterways (4.17-28), it does not identify the steepness of slopes along the alignment for each Project alternative. Instead, it simply states that some of the slopes on the Project site are in excess of 45 degrees. DEIR/S at 4.17-28. This statement is only in reference to Alternative 2; it provides no information about the steepness of slopes for the other alternatives. Notably, in the soils, geology, and seismicity section of the DEIR/S, the document identifies slopes in the Project as great as 75 percent. DEIR/S at 4.16-7.

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The DEIR/S also generally acknowledges the potential for "alterations in stream morphology and consequent impacts on hydrologic function." DEIR/S at 4.17-29. Once again, however, there is no evaluation of these impacts other than vague and generic statements such as the following:

0166-15, Hydrology and Water Quality (H&WQ)

This comment states that the impact analysis conducted for water quality in Impacts 4.17-1 and 4.17-2 should include a discussion of the TMDL adopted for the Truckee River. It also suggests several factors (hydrologic function, stream health, rate and amount of runoff, stream sedimentation, and slope stability) that could be considered for the analyses under these impact statements.

Section 4.17, "Hydrology and Water Quality," Impact 4.17-1 in the Draft EIS/EIR cites the TMDL targets for sedimentation for Squaw Creek and the Truckee River, and identifies the former listing of Bear Creek for sedimentation (pg. 4.17-29). These facts were used in evaluating the effects of erosion and sedimentation from the project. (See Draft EIS/EIR, p. 8-19.) The analysis in Impact 4.17-1 and 4.17-2 takes into account the combined effect of the overall character of the terrain, the nature of the soils in the area, the total potential area of disturbance, the level of activity, and the sensitivity of receiving streams to evaluate the threat of sedimentation to receiving waters. The comment is correct that the region is, as a general matter, sensitive to the effects of sedimentation and erosion. The adoption of TMDLs for Squaw Creek and the Truckee River are illustrative of this sensitivity. The analysis also takes into account, however, the RPMs incorporated into the project to ensure that erosion and sedimentation do not occur. All of these metrics are appropriate parameters to use for an analysis of the impacts related to erosion and sedimentation of waterbodies. The ability to minimize and control the mobilization of sediment during ground disturbance, and to trap sediment that is mobilized before it leaves the construction area and enters waterways is also considered. Erosion/sediment control through the implementation of proven best management practices (including meeting standards established by the LRWQCB) is well understood and has been successfully implemented as a means of ensuring that hydrological and water quality impacts do not occur during project construction. With the incorporation of BMPs, project-generated sediment is unlikely to mobilize or leave the construction area. Without sediment leaving the construction area and entering water bodies, there is not a need to further evaluate effects of sediment entering water bodies beyond the information already provided in the Draft EIS/EIR. The Draft EIS/EIR found that the project would have adverse and mitigated effects under NEPA, and less than significant effects with RPMs as mitigation under CEQA. These effects

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determinations included consideration of whether the project, including RPMs, would be sufficiently protective of the Squaw Creek and Truckee River TMDLs

Please note that the Draft EIS/EIR also addresses the potential to degrade water quality in Impact 4.17-3.

0166-16, Hydrology and Water Quality (H&WQ)

This comment states that the Draft EIS/EIR does not provide quantification of the following potential elements of the project, (1) extent of erosion, (2) amount of new impervious surface, (3) rate and amount of stormwater generated by the project, and (4) estimates of suspended sediment loads generated by the project. This comment also states that the hydrology section states that alignment slopes are greater than 45°, while the geology section states that slopes are up to 75°.

The analysis utilizes the metrics identified above in response to comment 0166-15 to evaluate the impacts associated with the project. The approach to the Draft EIS/EIR is, in this regard, a largely qualitative one, which is appropriate given the degree of detail associated with the project at this stage of planning. These qualitative evaluations are sufficient to determine the degree of impact of the project, and the relative degree of impact of each of the alternatives. The comment brings up issues typically associated with large projects with large construction disturbance areas and development of extensive areas of impervious surface, which is not the case for the gondola project. The impact analysis in the EIS/EIR is appropriate for a project of the size, scale, and type considered in the action alternatives. With less than 5 acres of new impervious surface to be developed, spread out in various point locations (towers, mid-stations, base terminals) over miles under each action alternative, the EIS/EIR provides sufficient information to conclude that there would not be significant adverse effects associated with the generation of stormwater or alteration in stormwater paths, given implementation of appropriate RPMs. The adequacy of the analysis of sedimentation and erosion is addressed in response to comment 0166-15, above. The type of additional information suggested in the comment would not alter the impact conclusions in the EIS/EIR, nor increase the ability of decision makers or the public to understand the type and severity of environmental effects.

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The description of the soil map units in Section 4.16 includes the slopes of the map units, several of which have slopes of 30-75 percent. The slope range for a soil map unit is part of the description for the map units, which occur, scattered, over large areas in this part of the Sierra Nevada. As this is a general slope range for these units, it is not specific to the project area. Percent and degrees are different units of measure for slope steepness, and 75 percent slope is equal to just less than 37 degrees. Section 4.17 states that slopes can be in excess of 45 degrees, which is equal to 100 percent slope.

0166-17, Hydrology and Water Quality (H&WQ)

This comment states that the hydrology section does not provide a sufficient explanation of the effects that sedimentation has on aquatic species or on parameters of ecosystem health, only that the section identifies that effects are possible. The comment notes that the Draft EIS/EIR states: "sedimentation of waterbodies may threaten ecosystem health by producing effects on natural functions such as light penetration, temperature adjustment, bottom conditions, and retention of organic matter (NRCS 2017). Imbalances in these functions can lead to a degradation of hydrological conditions, producing detrimental effects on aquatic species **such as increased mortality or chronic toxicity**" (pg. 4.17-27; emphasis added). However, this passage specifically states the parameters that could be altered by sedimentation and relates that to the types of effects they can have on aquatic species (mortality or chronic toxicity). Additional information on the effects of sedimentation on aquatic species is detailed in Section 4.14, "Wildlife and Aquatics." Consistent with responses above, the EIS/EIR provides sufficient information to assess the environmental effects of the project. A general description of the potential effects of sedimentation is included in the EIS/EIR to provide the reader an understanding of the potential consequences of sediment release. However, because sediment release is prevented through implementation of RPMs, BMPs, mitigation measures, and regulatory requirements (i.e., reduced to less than significant levels), no significant effects would occur, and further information on the nature of potential effects is not needed.

The comment also states that compliance with regulations is insufficient to support the conclusion that the project will not have significant impacts, and that the existence of a permit

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does not exempt a document from the CEQA requirement to analyze an impact that might be alleviated by such a permit. Compliance with regulations may or may not be sufficiently protective to eliminate the significant effects of a project, and the EIS/EIR addresses the ability of existing regulatory regimes to reduce environmental effects on a case by case basis. Similarly, compliance with project design features may or may not be sufficiently protective to eliminate significant effects of a project. The differences in levels of impact reduction based on specific circumstances is recognized in the impact analysis for effects on water quality, where Impact 4.17-1 makes a CEQA finding of *potentially significant* even with regulatory compliance, whereas Impact 4.17-2 makes a finding of *less than significant*, based on part on the impact reducing effects of regulatory compliance. All impacts considered in Section 4.17, "Hydrology and Water Quality," are evaluated, including those that may be alleviated through regulatory or permit compliance. As the Draft EIS/EIR concludes, in this instance, the implementation of the listed RPMs will ensure that significant water quality impacts will not occur.

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Sedimentation of waterbodies may threaten ecosystem health by producing effects on natural functions such as light penetration, temperature adjustment, bottom conditions, and retention of organic matter (NRCS 2017). Imbalances in these functions can lead to a degradation of hydrological conditions, producing detrimental effects on aquatic species such as increased mortality or chronic toxicity.

DEIR/S at 4.17-27. Such self-evident ruminations cannot substitute for meaningful analysis. *E.g., City of Antioch v. City Council* (1986), 187 Cal.App.3d 1325 (1986). Rather, an EIR/S must contain analysis sufficient to allow informed decision making. What effect would uncontrolled runoff have on light penetration, temperature adjustment, bottom conditions, and retention of organic matter on hydrologic conditions on Squaw Creek? What effect would excessive runoff have on Bear Creek? For example, if damage occurs to the creeks' channels from erosion and sedimentation, would the creeks be capable of repairing themselves through fluvial geomorphic processes? If not, habitat will be lost or degraded, and organisms specifically adapted to those habitats will be negatively impacted. In the absence of this type of information, it is not possible to evaluate the Project's impacts on aquatic species.

Rather than analyze these impacts, the DEIR/S looks to regulatory compliance to assert that erosion will be controlled, and water quality will be protected. *See* DEIR/S at 4.17-29: "Alternative 2 includes multiple layers of regulatory protections that the applicant and contractor(s) must abide by when executing construction activities;" *see also*, Appendix B at B-29: RMP WQ-5 "Squaw Valley Ski Holdings will obtain permits from appropriate regulatory agencies prior to commencing work in Waters of the United States or Waters of the State, and in stream and riparian habitats, and implement all applicable permit conditions." But merely requiring compliance with agency regulations does not conclusively indicate that the Project will not have a significant and adverse impact. Here, the regulations and standard permit conditions may not be strong enough to protect against environmental impacts. Indeed, the courts have recognized as much. In *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 716, for example, the court found that the fact that the EPA and the local air pollution control district had issued the necessary air emission permits for the construction of a coal-fired cogeneration plant did not nullify the CEQA requirement that the lead agency analyze the significant air quality impacts of the entire project. *Oregon Environmental Council v. Kunzman* (9th Cir. 1983) 714 F.2d 901, 905.

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Nor does the DEIR/S provide any evidentiary support that the RPMs would be adequate to protect water quality and aquatic resources. Many of the RPMs are excessively vague, unenforceable, unnecessarily deferred, and lacking performance criteria. For example, WQ-3 calls for all stormwater or groundwater within excavations to be discharged overland into well-vegetated areas to promote the settling of sediment, *where feasible*. Appendix B at B-28. A measure is not mandatory if it includes language such as "where feasible." WQ-6 is equally

0166-17 cont'd, Hydrology and Water Quality (H&WQ)

0166-18, Hydrology and Water Quality (H&WQ)

This comment states that the Resource Protection Measures (RPMs) are lacking language that would ensure their effectiveness, and that the project does not include a mechanism to measure effectiveness, such as performance criteria or water quality monitoring programs. The comment further states that the Draft EIS/EIR does not evaluate the effectiveness of the RPMs and suggests it would be useful for either the project, the RPMs, or the mitigation measures to require monitoring.

RPMs provide strict enforcement language where necessary to protect water quality and hydrology. While it is true that some RPMs contain language that allows flexibility in implementation, this flexibility does not preclude the effectiveness of the measures; rather it allows measures to be adapted based on site-specific circumstances.

The comment characterizes RPM WQ-6 as voluntary. This characterization is incorrect. This RPM (as with all other RPMs) must be implemented, and the Forest Service and Placer County have regulatory authority and a legal responsibility to ensure that RPMs are implemented (see further details in the introduction to Appendix B). RPM WQ-6 requires that roads, road ditches, and other disturbed areas near aquatic habitats drain to undisturbed soils rather than aquatic habitats. RPM WQ-6 provides flexibility in the volume of drainage to undisturbed soils to account for potential site specific conditions where 100% draining to undisturbed soils may not be possible; however, the standard of "to the maximum extent" still applies, and will be determined by the Forest Service and Placer County.

Significance determinations in the EIS/EIR are based on the implementation of all applicable RPMs. One RPM cannot be taken in isolation, unless the impact discussion only references a single RPM. For example, the discussion of Impact 4.17-1 (Alt. 2): Impacts from Erosion and Sedimentation Caused by Construction-Related Activities, references RPM WQ-3 as part of the basis for a less-than-significant impact; however, this determination is also based on the implementation of over 30 additional RPMs that contribute to the avoidance and minimization of this environmental effect.

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BMP monitoring is required to ensure RPMs are implemented and effective. RPM SOILS-3 states that, "all BMPs on Forest Service lands are required to meet the Forest Service Region 5 regional policy and to be consistent with the provisions of the 1981 Management Agency Agreement between the State Water Resource Control Board and the Forest Service as the designated Water Quality Management Agency on National Forest System Lands. Site-specific BMPs and management requirements and careful implementation and monitoring of BMPs, consistent with the requirements of these RPMs, are primary means of minimizing erosion and water quality impacts in this project area." This measure applies to Forest Service, Placer County, and private land. Such monitoring would ensure the effectiveness of measures intended to protect water quality. Additionally, water quality monitoring is often required as a condition of the 401 permit issued by the state.

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deficient: "For ground-disturbing activities near aquatic habitats, ensure that roads, road ditches, and other disturbed areas drain, *to the maximum extent possible*, to undisturbed soils rather than directly to aquatic habitats." *Id.* at B-29. Because this measure is voluntary, it is entirely unenforceable. Consequently, there is no assurance that ground-disturbing activities would not directly impact aquatic habitats.

Nor does the DEIR/S make any attempt to evaluate the effectiveness of the RPMs. Indeed, we can find no provision in the Project, its RPMs, or mitigation measures calling for any type of water quality monitoring. The DEIR/S should include a monitoring protocol that would allow for documentation of potential changes in channel condition, sediment load condition, and riparian vegetation that could result from Project-induced effects. Possible changes could include reduction of stream width and depth and riparian vegetation encroachment resulting in degraded habitat. Monitoring sites should occur at multiple locations along Squaw and Bear Creeks. Several years of pre-Project data should be collected in order to provide information on annual variability in sediment transport and riparian vegetation condition in response to different water-year types. During Project operation, monitoring should occur every three to five years, but also in any year with excessive rains.

0166-19

(c) The DEIR/S Improperly Defers Analysis of Local Flooding Impacts.

The Project proposes to permanently modify several significant drainage features at the Squaw Valley and Alpine Meadows base areas to accommodate the new base station terminals. *See, e.g.*, DEIR/S at 4.17-37. Construction also has the potential to alter surface flows by regrading contours within the disturbance areas associated with Project components and/or increasing the amount of impervious surface on the Project site. *Id.* The DEIR/S generally acknowledges the potential environmental consequences:

The very process of erosion can beget more erosion, causing a positive feedback loop, loosening topsoil and changing topography by degrees small and large in local areas where disturbance occurs. Preferential pathways can form, and the efficiency in the connections between eroded areas and natural watercourses can increase. If erosion causes sediment loads in waterways to increase, sediments would be deposited downstream on riverbeds and banks. Suspended sediment could also erode banks through abrasive action as water passes narrow or meandering river segments. These effects could produce changes to downstream hydrogeomorphology. Taken together, these geomorphic changes could produce a large effect on drainage in the project area. Drainage infrastructure in the stormwater drainage system at the base of the ski areas could be negatively affected because many of

0166-18 cont'd, Hydrology and Water Quality (H&WQ)

0166-19, Hydrology and Water Quality (H&WQ)

This comment identifies that the Draft EIS/EIR provides completion of a drainage study and stormwater engineering as mitigation for impacts associated with localized flooding. It also lists the CEQA criteria for deferral of mitigation, and states that those criteria have not been met in this case.

The Draft EIS/EIR reasonably concludes, given the absence of specific information relating to stormwater drainage capacity, there is the potential for changes to the flow regime associated with the project that may not be accommodated by the existing infrastructure. This is a conservative assumption in light of the small surface area of impervious surface (less than 2 acres for each base terminal and mid-station and less than half an acre combined for all towers), there would be little alteration in stormwater flows. Mitigation in this case is the preparation of a Drainage Report that contains, "a written text addressing existing conditions, the effects of the improvements, all appropriate calculations, a watershed map, increases in downstream flows, proposed on-and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used both during construction, as well as long-term post-construction water quality measures" (RPM WQ-9). The approach taken to address drainage and water quality must meet established County standards. County standards provide success criteria that the recommendations of the drainage report must meet. This report would be completed prior to final project approval and project implementation. RPM WQ-10 goes on to require that stormwater run-off shall be reduced to pre-project conditions. This approach provides success criteria against which the effectiveness of the mitigation will be judged, and the process and mechanisms to achieve that success criteria. This approach meets the three criteria cited in the comment allowing "deferral of mitigation",

1) There are practical considerations that preclude development of the measures at the time of project approval. In particular, there is insufficient information currently available to fully design and engineer drainage systems. Such systems will undergo final engineering only if the County and Forest Service approve an action alternative, focusing on the particular alignment that is approved (if any). Final engineering

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is subject to review and approval by the County and Forest Service.

(2) The EIR must contain criteria to govern the future actions implementing the mitigation. County drainage standards and requirements of RPMs provide success criteria future actions must meet.

(3) The agency has assurances that the future mitigation will be both "feasible and efficacious." Providing sufficient drainage infrastructure, especially for facilities providing less than 2-acres of impervious surface, is a straightforward engineering task which can be feasibly and effectively achieved (if needed, as existing drainage infrastructure may already be sufficient).

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the stormwater conveyance structures resemble natural features and are therefore susceptible to hydromodification. DEIR/S at 4.17-38.

Despite the potential for significant and adverse effects on the hydrological regime in the area, the DEIR/S explains that it is not possible to evaluate these impacts because information on peak flow conditions and engineered sizing is not available. DEIR/S at 4.17-38. Specifically, the document explains that although storm drainage systems could be inadvertently modified, or the capacity exceeded, resulting in localized flooding, these effects are “unknown.” *Id.* The DEIR/S provides no explanation as to why this essential information is unknown or why it could not be obtained.

Instead of properly analyzing these impacts, the DEIR/S relies on two RPMs (WQ-9 and WQ-10) calling for the preparation of a stormwater drainage study for both Squaw Valley and Alpine Meadows. DEIR/S at 4.17-38. However, CEQA generally prohibits deferral of mitigation, except in narrow circumstances. To justify deferral, (1) there must be practical considerations that preclude development of the measures at the time of project approval, (2) the EIR must contain criteria to govern the future actions implementing the mitigation, and (3) the agency has assurances that the future mitigation will be both “feasible and efficacious.” *Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17. *See National Parks & Conservation Assoc. v. BLM* (9th Cir. 2010) 606 F.3d 1058, 1073-74 (finding that BLM’s discussion of proposed landfill’s eutrophication risks was “patchwork [that could not] serve as a ‘reasonably thorough’ discussion”).

This standard is not met here. The DEIR/S provides no explanation of why this drainage study could not be complete now, prior to Project approval. Nor do the RPMs provide performance criteria to govern future actions that may be called for in the drainage study other than a vague assertion that stormwater runoff would be reduced to pre-project conditions. DEIR/S at B-30. Consequently, the DEIR/S wrongly concludes that the Project’s drainage impacts would be less than significant.

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(d) The DEIR/S Lacks a Legally Adequate Analysis of Cumulative Hydrology and Water Quality Impacts.

Cumulative impacts occur when many sites within the same watershed each contribute some pollutants to runoff. When all the relatively small contributions are added up, a significant impact is likely to occur. Cumulative stormwater quality impacts are associated with almost all projects that propose uses of increased intensity relative to existing conditions. An individual project may not, by itself, result in discharges of pollutants at a level that would violate water quality objectives or substantially degrade the quality of receiving waters (although this lack of “project level” impact has not been established in this DEIR/S). However, if the degraded runoff from the proposed Project is added to degraded runoff from all the surrounding projects in the

0166-19 cont'd, Hydrology and Water Quality (H&WQ)

0166-20, Hydrology and Water Quality (H&WQ)

The comment states that the cumulative analysis does not provide the degree of specificity in terms of individual cumulative projects, the projected water quality and hydrology impacts of those projects, or the affected waterbodies to assert that the project would not have significant cumulative impacts or result in an adverse cumulative condition.

Section 4.17.4.2, “Cumulative Impacts,” of the Draft EIS/EIR describes the cumulative condition generated by implementation of all cumulative projects and identifies that the project would not create hydrological or water quality effects of a magnitude that would be a considerable contribution to the cumulative condition realized with implementation of all projects. As identified in the responses above, the project would not contribute sediment to local waterways, and any increases in stormwater runoff must be reduced to pre-project conditions. With the proposed project not contributing to potential cumulative effects, it is appropriate to conclude that the project’s contribution is not cumulatively considerable.

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watershed, it is likely that substantial water quality degradation will occur. The DEIR/S's treatment of these potential impacts falls well short of legal standards as it is cursory and not quantitative.

The DEIR/S identifies 42 probable future projects that are in the Project vicinity and that have the possibility of interacting with the Project to generate cumulative effects. DEIR/S at 3-11; 3-12. The DEIR/S further explains that the scope of the cumulative impact analysis as it pertains to hydrology and water quality includes Bear Creek Watershed, Squaw Creek, and a portion of upper middle Truckee River. *Id.* The document never, however, specifically analyzes how the 42 projects would impacts these waterbodies.

Rather than actually analyze impacts from the probable future projects, it vaguely refers to "several planned communities and residential developments" and "ski resort improvements at Squaw Valley and Alpine Meadows." DEIR/S at 4.17-59. It does not identify the residential or ski resort projects by name, so it is not possible to determine which, if any, of these projects were considered in the cumulative analysis. *Id.* Nor does the cumulative analysis even mention the water bodies the document purports to analyze - Bear Creek Watershed, Squaw Creek, or the Truckee River.

Rather than provide any meaningful or informative cumulative impact analysis, the document simply asserts that "[m]ost of the projects would increase the extent of impervious surface area to varying degrees; however, any substantial increases in the extent of impervious surface area would have to be paired with infiltration and stormwater facilities designed and built to prevent any increase in stormwater runoff or peak flows." DEIR/S at 4.17-59. Based on this vague language, the DEIR/S concludes that the Project would not result in a considerable contribution to an overall adverse cumulative effect on hydrology or water quality in the project vicinity. *Id.* The DEIR/S provides no evidentiary support for this conclusion, in violation of CEQA and NEPA. *Pesticide Action Network North America v. Department of Pesticide Regulation* (2017) 15 Cal.App.5th 478, 509; *Foundation on Economic Trends v. Heckler* (DC Cir. 1985) 756 F.2d 143, 154.

The DEIR/S also asserts, absent any evidentiary support, that a stormwater management plan that would be implemented as part of the Village at Squaw Valley Specific Plan (VSVSP) will be sized to accommodate drainage from the cleared gondola areas. DEIR/S at 4.17-59. Here too, the DEIR/S provides no detail about the VSVSP stormwater management plan other than vague references to an "infrastructure phasing plan," and "system upgrades." *Id.* Indeed the document does not even disclose whether the infrastructure plan and system upgrades refer to the gondola project or the VSVSP project. The DEIR/S takes a "trust us" approach that impacts and mitigation measures will be worked out later, after the Project is approved. This approach is disingenuous and inconsistent with legal requirements. *See Californians for Alternatives to Toxics*, 136 Cal.App.4th at 17; 40 CFR §§ 1500.1(b), 1502.14(f) (providing that agency shall

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“[i]nclude appropriate mitigation measures not already included in the proposed action or alternatives”); *National Parks & Conservation Assoc.*, 606 F.3d at 1073-74.

Finally, the cumulative impact analysis fails to take into account hydrology and water quality impacts from *any* of the other projects identified in the probable list of projects. For example, the Sierra Nevada Forest Plan Amendment calls for vegetation management on 1,300,000 acres, the National Forest Service Over Snow Vehicle Use Designation Project would affect more than 870,000 acres, the Big Jack East Forest Restoration Project would affect 1,700 acres, and the Tahoe West Project would affect almost 60,000 acres. DEIR/S at 3-13—3-17. These four projects alone would potentially disturb more than two million acres of land and could cause a severe degradation of water quality in Bear Creek Watershed, Squaw Creek, and the Truckee River. The DEIR/S’s failure to describe the hydrologic effects of these projects, together with the other probable future projects, is a fatal flaw.

0166-21

4. The DEIR/S Fails to Adequately Analyze or Mitigate the Project’s Noise Impacts.

CEQA establishes a state policy to “[t]ake all action necessary to provide the people with . . . freedom from excessive noise.” Pub. Resources Code § 21001(b); *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (“*Berkeley Keep Jets*”) (2001) 91 Cal.App.4th 1344, 1380 (“[T]hrough CEQA, the public has a statutorily protected interest in quieter noise environments.”). Noise impacts are felt particularly acutely in quiet, rural residential and recreational environments like the Project setting. As such, the DEIR/S should have taken particular care to analyze and mitigate the Project’s noise impacts, but it did not.

0166-22

(a) The DEIR/S Does Not Adequately Analyze the Impacts from Blasting.

While construction of the Project would last over only one season, its noise and vibration impacts would be immense. In particular, construction would require blasting, which produces the loudest construction noise (DEIR/S at 4.9-16), along with vibrations (DEIR/S at 4.9-28). These impacts would be felt not only in the Wilderness Area (DEIR/S at 4.9-17), but also at residences very near the alignments of Alternatives 3 and 4 (*see* DEIR/S at 4.9-5). However, the DEIR/S fails to adequately analyze the impacts of the vibration on residences.

The DEIR/S first notes that the nearest residential neighbors to the Project’s construction could experience blasting vibration that exceeds the impact criteria (87 VdB at the nearest residence under Alternative 3, exceeding the 80 VdB impact criteria). DEIR/S at 4.9-28. But the DEIR/S then dismisses the impact, stating that this threshold is “designed for places where people sleep” but blasting would happen during the day. *Id.* This approach is disingenuous, however, as the DEIR/S describes this threshold as first applying to residences, and, second, to buildings where people normally sleep. DEIR/S at 4.9-8. There is no indication that this threshold

0166-20 cont'd, Hydrology and Water Quality (H&WQ)

0166-21, Noise (N)

The comment states that the EIS/EIR fails to adequately analyze or mitigate the project noise-related impact. The project’s noise impacts are addressed in the EIS/EIR under following impact headings:

Impact 4.9-1, Construction Noise Impacts; Impact 4.9-2, Construction Vibration Impacts; Impact 4.9-3, Exposure of Existing Sensitive Receptors to Operational Noise from Proposed Gazex Exploders and Gondola; and Impact 4.9-4, Exposure of Existing Sensitive Receptors to Operational Project-Generated Transportation Noise Sources.

See the responses to comments 0166-22, 0166-23, and 0166-24 for a discussion of noise-related comments.

The comment also states that “noise impacts are felt particularly acute in quiet, rural residential and recreational environments like the Project setting.” Sound level measurements were collected at sensitive land uses near the study area to characterize the existing noise environment. See Exhibit 4.9-1 on page 4.9-5 for the locations of these measurements. See Table 4.9-4 on page 4.9-6 of the Draft EIS/EIR for the results of these long-term measurements. Also, noise standards established by Placer County were used as criteria for assessing the significance of project-related noise impacts. The county’s noise standards are presented in Section 4.9.1.5, “Regulatory Setting,” beginning on page 4.9-8 of the Draft EIS/EIR.

0166-22, Noise (N)

The comment states that the EIS/EIR does not adequately analyze the impacts of noise and ground vibration that would be generated by blasting activity during project construction. Noise generated by blasting and ground vibration generated by blasting are discussed separately below.

Regarding noise generated by blasting, the comment states that blasting activity would produce the loudest noise during project construction and refers to Table 4.9-11 on page 4.9-16 of the EIS/EIR. As shown in Table 4.9-11, blasting activity would generate the highest maximum noise level (Lmax) of the various activities listed. However, because blasting is not a

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continuous activity it may not be the loudest of the activities listed in Table 4.9-11 when a comparison of equivalent continuous sound levels (Leq) is drawn. As shown in Table 4.9-11, the loudest Leq listed is 86.0 decibels generated by grading and foundation work.

The potential effects of noise generated by blasting during construction are addressed under Impact 4.9-2. For Alternative 2, 3, and 4, see the text starting on pages 4.9-17, 4.9-26, and 4.9-31 of the Draft EIS/EIR, respectively. The analysis for Alternative 2 states that the level of noise exposure from blasting at any sensitive receptor would be no higher than 79.6 Lmax and as high as 86.0 Lmax within the eastern boundary of the National Forest System-Granite Chief Wilderness (GCW). The analyses for Alternative 3 and Alternative 4 explain that blasting activities would be located closer to the existing residences on the Alpine Meadows side of the gondola but further away from the National Forest System-GCW, resulting in slightly higher noise levels at these residences but lower levels within the National Forest System-GCW as compared to Alternative 2. The analyses for Alternatives 2, 3, and 4 also explain that blasting would only occur during daytime hours as required by RPM NOI-6. RPM NOI-6 requires blasting and other noise-generating construction activity to occur only during the daytime hours. Such activity is exempt from Placer County's noise standards, including the 70 Lmax standard established in the county's noise ordinance (Table 4.9-9). In addition, the restriction on when this activity can occur operates as a performance standard; compliance with this standard ensures that the impact will be less than significant. Therefore, noise generated by blasting activity would not exceed any applicable noise standards. This analysis of noise exposure from blasting is considered adequate.

Regarding ground vibration exposure from blasting, the comment expresses disagreement with the analysis of blasting-generated ground vibration under Alternative 3. The comment is correct that the analysis estimated that the house closest to one of the tower sites where blasting may occur could be exposed to levels of ground vibration of 87 vibration decibels (VdB), which is greater than the 80-VdB impact criterion recommended by the Federal Transit Administration (FTA) (Table 4.9-6) for "infrequent" ground vibration events. The comment correctly points out that FTA's recommended criterion of 80 VdB is for "residences and buildings where people normally sleep" and this does not mean the criterion should not be applied to events that occur during non-sleeping

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hours. However, when evaluating potential noise impacts, health effects are generally associated with sleep disturbance, and for this reason, when noise-generating events do not occur during the sensitive times of the day, people are less likely to be adversely impacted. As discussed on page 4.9-20 of the Draft EIS/EIR and required by RPM NOI-6, blasting would not occur during the sensitive times of the day, and therefore; would not disturb people who are sleeping. Further, blasting events would be limited and infrequent. Moreover, it is unclear whether FTA's vibration criteria are intended for assessing vibration exposure from construction activity, which is short-term in nature, in addition to vibration generated by long-term operation of transit operations (e.g., passing trains). Nonetheless, to further reduce the potential for human annoyance to be experienced by residents at this single house on the Caldwell Property, RPM NOI-4 is revised as follows to minimize the potential for human annoyance:

NOI 4. Include the following standard note on the Improvement Plans and Construction and Operation Plans: In the event of blasting, three copies of an approved plan and permit shall be submitted to the County not less than 10 days prior to the scheduled blasting. A blasting permit must be obtained from the Placer County Sheriff's Department for all blasting to be done in Placer County. Additionally, the County must be notified and give approval for all blasting done within County right-of-way. If utility infrastructure is in the vicinity where blasting is to occur, the appropriate utility companies must be notified to determine possible damage prevention measures. If blasting is required, the blasting schedule shall be approved by the County and any other utility companies with facilities in the area prior to the commencement of work.

Blasting will only be conducted by State licensed contractors.

Occupants of residential dwelling units located within 230 feet of any site where blasting would take place shall be notified (in person or via phone or written notice) at least one week before the blasting would occur to warn them of any potential annoyance. The 230-foot distance is based on the modelling performed for the project (see EIS/EIR Impact 4.9-2 and Appendix F). Only a few residences are located within 230 feet of where blasting could occur. Occupants shall be given a set window of time during the day when blasting will occur. They shall also be given a reminder approximately 1 hour before the time window for blasting begins. Notification shall indicate the approximate number of blasting events and the time frame in which they would occur (e.g., 1:00 PM to 4:00 PM).

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This measure applies to both National Forest System and private lands.

The comment also states that the EIR/EIS "fails to explain whether this vibration is so close to the residences that it could damage the homes." This statement is incorrect. The potential for construction-related ground vibration to cause structural damage to residential dwelling units is discussed on page 4.9-20 of the Draft EIS/EIR, under Impact 4.9-2 for Alternative 2. On this page the analysis explains that blasting would occur beyond 100 feet of any structure and due to the rapidly diminishing intensity of ground vibration with distance from the source no existing structures would be exposed to blasting activities that could result in structural damage. This conclusion is based on vibration modeling conducted for the project, which is referenced in the discussion of vibration causing human annoyance. As explained on the same page, the lack of sufficient vibration to cause structure damage is the reason the analysis focusses on disturbance and annoyance to people from ground vibration. Discussion under Impact 4.9-2 for Alternative 3 (page 4.9-28) indicates that blasting could occur as close as 130 feet from the nearest house. Similarly, discussion under Impact 4.9-2 for Alternative 4 (page 4.9-33) indicates that blasting could occur as close to 300 feet from the nearest house. In short, blasting would not occur close enough to an existing residence to result in structural damage.

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cont'd

is limited to nighttime impacts to residences, as the DEIR/S suggests. The DEIR/S also minimizes the impact by noting that the blasting would be for only a short period of time. *Id.* But the 80 VdB criteria is the threshold for *infrequent* events, so even occasional blasting falls into this category. DEIR/S at 4.9-8. The DEIR/S also fails to explain whether this vibration is so close to the residences that it could damage the homes.

Despite the clear significance of this impact under its own thresholds, the DEIR/S nonetheless concludes that the impact would be less than significant under CEQA for Alternative 3. DEIR/S at 4.9-28. Curiously, the DEIR/S bases this conclusion in part on the point that the “blasting activities would be ... far enough away from sensitive receptors that ground vibration thresholds would not be exceeded.” *Id.* This directly contradicts the statement, on the *exact same page*, that the thresholds would be exceeded for at least one residence. *See id.* The DEIR/S must be revised to disclose this impact and to properly mitigate it.

0166-23

(b) The DEIR/S Fails to Adequately Mitigate the Project’s Noise Impacts.

The DEIR/S relies on a package of RPMs to mitigate the Project’s noise impacts. Specifically, the DEIR/S finds the Project’s construction and operational noise impacts to be adverse or significant under all alternatives. DEIR/S at ES-20 – 21. While the DEIR/S admits that the construction noise impacts are significant and unavoidable (*see id.*), it purports to rely on the RPMs and additional mitigation to reduce the Project’s impacts to a less than significant or no effect level (*see id.*). But these measures are legally deficient.

First, RPM NOI-1 is inadequate because it is improper deferred mitigation that provides no performance standard. As noted above, CEQA prohibits deferral of mitigation unless (1) there are practical considerations that preclude development of the measures at the time of project approval, (2) the EIR contains criteria to govern the future actions implementing the mitigation, and (3) the agency has assurances that the future mitigation will be both “feasible and efficacious.” *Californians for Alternatives to Toxics*, 136 Cal.App.4th at 17. NEPA also mandates that the EIS thoroughly analyze mitigation. 40 CFR § 1502.14(f).

Despite these legal requirements, NOI-1 provides only that the Applicant would “designate a Disturbance Coordinator, who will be responsible for responding to any local complaints about construction noise. The Disturbance Coordinator will determine the nature of the noise complaint and propose reasonable measures to correct the problem.” DEIR/S at B-9 (emphasis added). While it may be reasonable to allow the Disturbance Coordinator to define future measures to address specific complaints, the DEIR/S must provide performance criteria for doing so. For example, the DEIR/S could provide criteria for response times, standards that must be met for certain kinds of predictable complaints or identify a menu of options from which the Disturbance Coordinator will draw.

0166-22 cont'd, Noise (N)

0166-23, Noise (N)

The comment expresses concern about the RPMs and mitigation measures identified to address construction-related noise impacts for the action alternatives (i.e., Alternatives 2, 3, and 4). Noise generated by construction activity is addressed under Impact 4.9-1 for all alternatives.

The comment states: “While the DEIR/S admits that the construction noise impacts are significant and unavoidable (see *id.*), it purports to rely on the [Resource Protection Measures (RPMs)] and additional mitigation to reduce the Project’s impacts to a less than significant or no effect level.” This statement is inaccurate. It is correct that the analysis under Impact 4.9-1 determines that construction noise impact would be significant. However, the Draft EIS/EIR did not conclude that the RPMs and mitigation would reduce the impact to a less-than-significant, or no effect level. As shown on page 4.9-19, 4.9-27, 4.9-32, the Draft EIS/EIR concludes that Impact 4.9-1 would be significant and unavoidable with mitigation for Alternative 2, Alternative 3, and Alternative 4, respectively.

The comment also states that the mitigation measures addressing construction-related noise are inadequate because they defer mitigation and do not include a specific performance standard. The comment suggests that the NOI-1, which requires a designated Disturbance Coordinator, to address respond to local noise complaints, should specify response times, identify standards that must be met, or identify a menu of options from which the Disturbance Coordinator will draw. The comment further states that “NOI-2 and NOI-5 are too vague to serve as adequate mitigation.” First, the comment critiques each comment one-by-one; however, RPMs work as a suite of actions to minimize environmental effects. In the case of construction noise, no single RPM is purported to address all noise effects on its own. All applicable RPMs must be considered together to assess an overall reduction in noise impacts. In response to the concerns expressed in the comment, RPMs NOI-1, NOI-2, NOI-5, and NOI-6 are revised as follows:

NOI-1. Squaw Valley Ski Holdings will designate a Disturbance Coordinator, who will be responsible for responding to any local complaints about construction noise. The Disturbance

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Coordinator will determine the nature of the noise complaint and ~~will propose reasonable measures to correct the problem whether a residence or other noise-sensitive receptor is exposed to a noise level that exceeds one or more of the noise level standards established in the Placer County Noise Ordinance (Article 9.36.060 Sound limits) and presented in Table 4.9-9 of the Draft EIS/EIR. If the Disturbance Coordinator determines that a noise ordinance standard has been exceeded at a sensitive receptor then the Disturbance~~ Coordinator will work with the construction contractor to identify and implement site-specific measures to reduce the level of noise exposure to less than the applicable County standard, to the extent feasible. The Disturbance Coordinator will conclude its investigation of each local complaint within two full business days of receiving the complaint. If the investigation determines that feasible, effective noise exposure reduction measures shall be implemented, then the offending construction activity will not continue until the identified site-specific reduction measures are implemented. Site-specific measures to lessen noise exposure may include the following:

Stage construction equipment as far from the affected receptors as possible. Use quieter equipment for construction activity near affected receptors (e.g., a front-end loader instead of an excavator). Limit the number of equipment that are used at the same time in proximity to the affected sensitive receptor. Where available and feasible, only use equipment with back-up alarms that is equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. Self-adjusting backup alarms shall automatically adjust to be no more than 10 dBA louder than the surrounding background levels. Set all non-self-adjusting backup alarms to the lowest setting required to be audible above the surrounding noise levels. Install temporary noise-reducing enclosures around stationary noise-generating equipment (e.g., concrete mixers, generators, compressors). Install temporary noise curtains as close as possible to the noise-generating activity such that the curtains obstruct the direct line of sight between the noise-generating construction activity and the nearby sensitive receptors. Temporary noise curtains shall consist of durable, flexible composite material featuring a noise barrier layer bounded to sound-absorptive material on one side. The noise barrier layer shall consist of rugged, impervious, material with a surface weight of at least one pound per square foot. Specify routes of trucks hauling materials and equipment to construction sites and hauling debris away from staging areas to avoid exposing sensitive receptors to haul truck noise.

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Change helicopter flight paths to avoid exposing sensitive receptors to helicopter noise.

NOI-2. All internal combustion-engine driven equipment will be equipped properly maintained with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturer recommendations. Equipment engine shrouds will be closed during equipment operation.

NOI-5. Prior to Placer County Improvement Plan approval, the project owner or authorized managing entity shall insure that all construction vehicles or equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers at all times during project construction as required by RPM NOI-2. It is the owner's/applicant's responsibility to obtain the services of a qualified acoustical professional to verify proper equipment mufflers if concerns relating to the issue arise. A note to this effect shall be added to the Placer County Improvement Plans where applicable.

NOI-6. Construction noise emanating from any construction activities, including any blasting and helicopter flights, is prohibited on Sundays weekends and Federal Holidays, and shall only occur:

- a) Monday through Friday, 6:00 am to 8:00 pm (during daylight savings)
- b) Monday through Friday, 7:00 am to 8:00 pm (during standard time)
- ~~c) Saturdays, 8:00 am to 6:00 pm~~

In addition, temporary signs 4 feet x 4 feet shall be located throughout the project, as determined by the Placer County Development Review Committee (DRC), at key intersections depicting the above construction hour limitations. Said signs shall include a toll free public information phone number for the Disturbance Coordinator where surrounding residents can report violations and the ~~developer/builder~~ Disturbance Coordinator will respond and resolve noise violations. The Disturbance Coordinator will respond to noise complaints in accordance with the requirements of RPM NOI-2. This condition shall be included on the Placer County Improvement Plans and shown in the County's development notebook.

Quiet activities, which do not involve heavy equipment or machinery, may occur at other times. Work occurring within an enclosed building, such as a building under construction with

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the roof and siding completed, may occur at other times as well.

The Planning Director is authorized to waive the time frames based on special circumstances, such as adverse weather conditions.

This same plan shall be submitted to the Forest Service for their review and incorporation into the Construction and Operation Plans.

The comment also states that RPM NOI-4 does not actually mitigate anything. RPM NOI-4 requires that the Applicant or its contractor obtain a permit from the County, including approval of a blasting schedule, prior to blasting and that blasting only be conducted by State-licensed contractors. By requiring that all blasting be conducted by a licensed contractor implementation of RPM NOI-4 will help prevent excessive frequency or level of blasting. By requiring a permit, including approval of the blasting schedule by the County, RPM NOI-4 will prevent blasting from occurring during noise-sensitive evening and nighttime hours.

The comment also provides a critique of RPM NOI-6, which requires, among other measures, that signs be located throughout the project site showing the time limitations when noise-generating construction can occur and showing a phone number for reporting violations and noise concerns. Again, the comment argues that implementation of RPM NOI-6 would not reduce noise impacts. Please refer to the revisions to RPM NOI-6, and the related RPM, NOI-2, which address this concern by providing greater detail on the implementation and requirements of these RPMs.

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cont'd

NOI-2 and NOI-5 are too vague to serve as adequate mitigation. NOI-2 requires that internal-combustion equipment must be "equipped with intake and exhaust mufflers that are in good condition and appropriate for the equipment." *Id.* Similarly, NOI-3 requires mufflers on construction equipment near residences. *Id.* While NOI-3 adds the requirement that the Applicant must engage the services of a professional to prove the mufflers are appropriate if there is a complaint, this RPM still falls short. Critically, these RPMs fail to identify (1) what decibel levels must be maintained by the mufflers or (2) what kind of equipment is appropriate to muffle machinery noise. As it stands, there is simply no way to determine if the mitigation would be effective.

NOI-4 does not actually mitigate anything. That RPM merely requires the Applicant to obtain blasting permits in advance of blasting. *Id.* It does not do anything to minimize the actual impacts of blasting.

NOI-6 defines allowed working hours and requires the Applicant to place signs with a phone number that neighbors can call with complaints. DEIR/S at B-10. Upon receiving a complaint, the Applicant "will respond and resolve noise violations." *Id.* But like with RPM NOI-1, this mitigation measure is legally adequate because it is vague and fails to establish performance criteria for the to-be-devised mitigation.

(c) The DEIR/S Fails to Properly Disclose the Project's Cumulative Noise Impacts.

The DEIR/S concludes that the Project would not result in a substantial contribution to a significant cumulative noise impact because "traffic noise increases attributable [to the Project] would be minor and inaudible (i.e., less than 0.5 dBA)." DEIR/S at 4.9-39. But the whole point of the cumulative impacts analysis is to determine if an individually insignificant impact would, when combined with other cumulative impacts, be significant. *See, e.g.,* Guidelines § 15355(b) ("Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.").

Here, it was not enough for the DEIR/S to assume that since the increase in traffic noise brought by the Project would be minor, it would not have a substantial contribution to cumulative traffic noise. The DEIR/S should have explained how the Project's traffic noise would combine with other cumulative projects' noise, and what this impact would look like.

5. The DEIR/S Fails to Adequately Analyze or Mitigate the Project's Transportation Impacts.

Although the proponents tout the Project as a solution to existing traffic problems, the DEIR/S admits that it would actually make traffic worse. The document's failure to thoroughly examine these impacts, or to mitigate them, violates CEQA and NEPA.

SHUTE, MIHALY
& WEINBERGER LLP

0166-23 cont'd, Noise (N)

0166-24, Noise (N)

The comment states that the Draft EIS/EIR does not properly disclose the project's cumulative noise impact. The cumulative noise impact discussion is presented on pages 4.9-38 through 4.9-40 of the Draft EIS/EIR. This analysis states that traffic noise increases attributable to Alternatives 2, 3, and 4 would be minor and inaudible because they would be less than 0.5 A-weighted decibels [dBA], as shown in the summary of traffic noise modeling results in Table 4.9-13 on page 4.9-25. The reason noise level increases less than 0.5 dBA are considered minor and the fact that they are inaudible is explained under the heading, "Human Response to Changes in Noise Levels," on page 4.9-3 of the EIS/EIR. In that section, it is explained that a 1-dBA increase in noise levels is imperceptible. The comment provides no evidence to the contrary.

The comment also states that, as stated in the CEQA Guidelines Section 15355(b), "cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." With respect to noise-related impacts it is important to consider the logarithmic nature of the decibel scale. As explained on page 4.9-2, a doubling of sound energy corresponds to a 3-dBA increase. The traffic noise modeling summarized in Table 4.9-13 shows roadside traffic noise levels under both existing conditions and existing-plus-project conditions. Due to the logarithmic nature of addition on the decibel scale, the traffic noise increases between existing and existing-plus-project conditions would be larger than traffic noise increases between cumulative-no-project and cumulative-plus-project conditions, which would involve higher traffic volumes. Thus, regarding the question of whether the project's contribution to traffic noise would be cumulatively considerable, it is conservative to evaluate the traffic noise increases between existing and existing-plus-project conditions to support the impact conclusion.

0166-25, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment provides a summary of themes/issues addressed in detail in subsequent comments and states that

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the Draft EIS/EIR fails to thoroughly examine traffic impacts, and fails to mitigate them.

The transportation study provided in the Draft EIS/EIR analyzed numerous intersections, County roadways, and state highway segments during multiple peak hours under existing and cumulative conditions. See responses to comments 0166-26 and 0166-27, below, for a more detailed response to issues raised.

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0166-26

(a) The DEIR/S's Conclusion that the Project's Impact at the Intersection of Squaw Valley Road/Chamonix Place Would Be Mitigated to a Less Than Significant Level Is Not Supported by Substantial Evidence.

At the Squaw Valley Road/Chamonix Place intersection, the increase in vehicle trips from the Project would worsen the level of service (LOS) from D to E, causing a 14-second increase in delay; this increase in delay constitutes a significant impact. DEIR/S at 4.7-39. The DEIR/S concludes that this impact would be mitigated to a less than significant level primarily by employing traffic personnel to manage traffic at the intersection. *Id.* The document, however, fails to provide any evidentiary support that Squaw Valley can “manage” traffic in a manner that would eliminate this impact. The closest the DEIR/S comes is the assertion that traffic control personnel are used at the intersection of Squaw Valley Road and Wayne Road and that this intersection operates at an acceptable LOS. DEIR/S at 4.7-39. But this comparison is meaningless as the two intersections have different operating characteristics and traffic volumes. Moreover, the DEIR/S provide no support for the assertion that the intersection of Squaw Valley Road and Wayne Road actually operates at an acceptable LOS. In fact, according to the VSVSP EIR, this intersection currently operates at an *unacceptable* LOS. *See* VSVSP EIR Transportation Chapter, excerpts, at 9-57—9-58, attached as Exhibit F. Consequently, the DEIR/S's conclusion that traffic management would mitigate the Project's traffic impacts cannot be sustained.

Moreover, the EIR for the VSVSP relied on this same approach: promising to do a better job managing traffic than the ski resort currently does. Yet, Squaw Valley has a well-documented history of *mismanaging* traffic operations. In addition to the fact that Squaw Valley Road has too little capacity for the massive amount of traffic generated by the resort—a situation that will worsen significantly if the VSVSP is implemented—the resort has insufficient parking for its visitors. According to the Squaw Valley Fire Department “virtually ALL of the current issues associated with traffic and circulation in Squaw Valley – and the ripple effects on SR 89, SR 28, Donner Pass Road, West River Street and Eastbound I-80 – have their basis in poor planning and management/ operation of parking at Squaw Valley Resort.” VSVSP EIR at 3.2.7-4—3.2.7-5 (Comment LL1-6), attached as Exhibit G. The Fire Department goes on to explain that, year after year, Squaw Valley ignores the parking and circulation issues that plague the entire region. *Id.*

Courts allow a review of prior shortcomings in analyzing the adequacy of an EIR. For example, the California Supreme Court has stated that “[b]ecause an EIR cannot be meaningfully considered in a vacuum devoid of reality, a project proponent's prior environmental record is properly a subject of close consideration in determining the sufficiency of the proponent's promises in an EIR.” *Laurel Heights I*, 47 Cal.3d at 420. The applicant's past inability to manage its parking and vehicular flow raises significant red flags for handling the increase in traffic from

0166-26, Transportation and Circulation/Traffic and Parking (T&C/T&P)

This comment consists of four sub-comments, which are summarized below along with a detailed response.

#1: The comment states that the Draft EIS/EIR fails to provide any evidentiary support that Squaw Valley can manage the Squaw Valley Road/Chamonix Place intersection in a manner to eliminate the project impact.

This three-legged intersection is located along the portion of Squaw Valley Road where it transitions from an east-west to north-south roadway. General traffic engineering guidelines suggest that a signalized intersection (or one operated manually to assign vehicle right-of-way similar to signals) can serve about 1,500 vehicles per hour per lane. Under existing plus project PM peak hour conditions, the critical movement volume would be 719 vehicles per hour per lane, which represents about 48 percent of the intersection's capacity (i.e. LOS A). Thus, the intersection would function acceptably if operated by personnel that assign right-of-way. See subsection comment #3 below for further information.

#2: The comment states that the Draft EIS/EIR conclusion that traffic control personnel and resulting operations currently in use at the Squaw Valley Road/Wayne Road intersection is not sufficient because the Squaw Valley Road/Chamonix Place and Squaw Valley Road/Wayne Road intersections feature different operating characteristics and traffic volumes. Further, the comment states that the VSVSP DEIR shows the Squaw Valley Road/Wayne Road intersection operating at an unacceptable LOS.

Both intersections consist of three legs, though the Squaw Valley Road/Wayne Road intersection carries more traffic. As described on page 4.7-11 of the Draft EIS/EIR, the Squaw Valley Road/Wayne Road intersection currently operates at an acceptable LOS B or better due to the presence of manual traffic control. Operations were reported to be worse as part of the *Village at Squaw Valley Specific Plan DEIR* because manual traffic control was not in effect at that time. The improved traffic conditions between the time the VSVSP Draft EIR was prepared in 2014/2015 and when the Gondola Draft EIS/EIR was prepared in 2017/2018 is evidence of the effectiveness of manual traffic controls in improving intersection operations (i.e., the effectiveness of manual traffic control as a mitigation measure). Conditions at this intersection improved between 2014/2015 and 2017/2018. There was not a

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significant decline in the volume of traffic during this period. The physical characteristics of this intersection did not change. During this period, manual traffic control commenced. The conclusion drawn from this evidence is that manual traffic control has been effective at improving the operation of this intersection.

#3: The comment contends that Squaw Valley's inability to adequately manage its parking and vehicular flows raises significant red flags for handling the increase in traffic from the proposed project. It concludes by stating the Draft EIS/EIR conclusion that traffic management would prevent significant impacts lacks foundation.

There are numerous examples of traffic management plans being successful in handling large numbers of vehicles. Some common examples include sporting venues, churches, and other large gatherings. Successful traffic management plans start with detailed planning, identification of needed resources (both personnel and equipment), real-time communication during events, and self-evaluation/modification of plans to improve the plans from event to event. In addition, as stated above, improved traffic conditions between preparation of the VSVSP EIR and the Gondola EIS/EIR indicate the effectiveness of properly implemented traffic management programs in the project area. Finally, once Mitigation Monitoring and Reporting Programs (MMRPs) are adopted for the VSVSP and the Gondola, Placer County undertakes the regulatory authority, and duty, to require that the project applicant properly implement mitigation measures (as well as RPMs included in the Gondola EIS/EIR) for which the applicant is responsible. The Draft EIS/EIR for the Gondola properly concluded that the traffic management plan would reduce identified impacts to less-than-significant.

This comment is the same as a claim raised by the commenter in litigation challenging the EIR prepared for the VSVSP. In that claim, the commenter alleged that conditions of approval and mitigation measures relying upon the applicant's expansion of its traffic management program. The Placer County Superior Court denied this claim. (See *Sierra Watch v. Placer County*, Placer County Superior Court Case No. SCV-0038777, Ruling on Petition for Writ of Mandate, pp. 9-10 (August 18, 2018)).

#4: The comment cites several purported flaws associated with Mitigation Measure 4.7-9, which requires the applicant to

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manage traffic by using a three-lane coning program on days when traffic on Squaw Valley Road is expected to exceed 13,500 average daily trips. Stated flaws associated with this approach include: (1) there is no indication for how Squaw Valley will determine when the projected flow will exceed 13,500 ADT, (2) the three-lane coning program is already in use on Squaw Valley Road, (3) a program already in existence is not considered mitigation, and (4) Squaw Valley has demonstrated an inability to effectively manage traffic flows.

A number of sources can be used to estimate the following day's expected daily traffic levels, such as number of pre-purchased lift tickets, anticipated snow/weather conditions, level of lodging reservations, day of week, and historical year-over-year traffic data (collected through a permanent count station). While the three-lane coning program is already in effect, it does not always operate during both the AM and PM peak hours and may not be in operation on days when traffic volumes spike. Accordingly, the proposed three-lane coning program would be more robust, consistently used, and effective under Mitigation Measure 4.7-9 than the current program. In other words, although this program is currently implemented, Mitigation Measure 4.7-9 requires an expansion of this program. In addition, as stated above, once a MMRP is adopted for the Gondola project, Placer County undertakes the regulatory authority, and duty, to require that the project applicant properly implement mitigation measures, including Mitigation Measure 4.7-9. This oversight and enforcement authority will assist in ensuring that the three-lane coning program is effectively implemented. With respect to the applicant's implementation of traffic control measures, please see response to comment 0166-025.

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the proposed Project. Accordingly, the DEIR/S's conclusion that future promises of traffic management would prevent significant impacts lacks foundation.

Similarly, the DEIR/S relies on traffic management to mitigate the Project's cumulative impacts on Placer County roadways. DEIR/S at 4.7-56. Specifically, Mitigation Measure 4.7-9 calls for Squaw Valley to manage traffic by using the three-lane coning system on days when traffic on Squaw Valley Road exceeds 13,500 average daily trips (ADT). *Id.* There are numerous flaws with this mitigation measure. First, the DEIR/S provides no indication as to how Squaw Valley will even determine which days are projected to exceed 13,500 ADT. Indeed, this is the precise approach the VSVSP EIR called for to mitigate that project's traffic impacts even though that EIR expressed doubt as to the feasibility of the measure. (*See* Exhibit F at 9-8, stating: "peak attendance days can be difficult to forecast" [VSVSP EIR Transportation Chapter]. Second, Squaw Valley already uses the three-lane coning program. DEIR/S at 4.7-4; 4.7-6; 4.7-9; 4.7-11; 4.7-18. In addition, a program that is already in existence is not mitigation. Finally, as discussed above, Squaw Valley has demonstrated an inability to effectively manage traffic that fatally undermines this mitigation measure as well as the DEIR/S's conclusion that the measure would render impacts less than significant.

0166-27

(b) The DEIR/S Fails to Adopt Feasible Mitigation for the Project's Other Significant Traffic Impacts, Opting Instead to Identify These Impacts as Significant and Unavoidable.

In addition to the significant traffic impacts discussed above, the DEIR/S finds several other traffic impacts to be significant despite mitigation. These include: (1) Impact 4.7-4: Impacts at Vehicular Queuing at Caltrans Intersections; (2) Impact 4.7-11: Cumulative Impacts on Caltrans Intersections; (3) Impact 4.7-12: Cumulative Impacts on Vehicular Queuing at Caltrans Intersections; and (4) Impact 4.7-13: Cumulative Impacts on Caltrans Highways. DEIR/S at 4.7-41; 4.7-63; 4.7-64; 4.7-65. The DEIR/S identifies two mitigation measures for these impacts: (1) coordinating with Caltrans, and (2) offering to comply with a trip reduction ordinance, before concluding that these four impacts would remain significant and unavoidable.⁴ *Id.*

⁴ Oddly, Mitigation Measure 4.7-11 does not appear to apply to the proposed Project at all. It refers to approval of a Plan, rather than the Gondola Project. DEIR/S at 4.7-63. It also calls for compliance with the Placer County Trip Reduction Ordinance. *Id.* We can find no reference to the Placer County Trip Reduction Ordinance anywhere else in the DEIR/S. Moreover, the measure itself is vague and therefore unenforceable. The suggested trip reduction strategies include, for example, operation of a "convenient" shuttle system between resorts and off-site park-and-ride lots. *Id.* The DEIR/S does not identify the factors that would make a shuttle service convenient. Nor does it identify which resorts would be subject to the shuttle system. Moreover, it is unlikely that this measure refers to Squaw Valley and Alpine Meadows as the current shuttle

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0166-26 cont'd, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0166-27, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The issues raised in this comment are addressed in the Master Response related to Vehicle Trip Reduction Measures provided in Section 1.8, "Master Responses" in this volume.

0166-27 cont'd, Transportation and Circulation/Traffic and Parking (T&C/T&P)

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The DEIR/S's perfunctory approach to mitigation is not sufficient. There are ample opportunities to mitigate the Project's transportation impacts. For example, the applicant could implement the trip reduction measures identified in the VSVSP EIR; these measures, while not mandatory, were identified to reduce that project's air quality impacts.⁵ See VSVSP EIR Air Quality Chapter, excerpts attached as Exhibit H. There is no doubt that the following list of measures are feasible since they were developed by the Placer County Air Pollution Control District, the California Air Pollution Control Officers Association, and the California Attorney General's Office (VSVSP EIR at 10-17):

- Provide free or discounted transportation service between the Village and the Amtrak station in Truckee to all overnight visitors who arrive by train. This service may be implemented in coordination with a local taxi service, the North Tahoe-Truckee Free Ski Shuttle, or other public or private shuttle service.
- Offer discounted overnight accommodations, meals, activities, or other incentives to visitors who arrive by train to the Amtrak station in Truckee and/or to groups who arrive by bus or some other emissions-efficient vehicle type.
- Offer free, shared, or discount rental bicycles to all visitors staying in the hotel or resort residential units.
- Provide shuttle service to other key destinations in the region (e.g., North/West Shore of Lake Tahoe, casinos, Truckee) to serve guests who want to tour regional offerings.
- Provide a covered bicycle parking area near entrance of all commercial establishments.
- Provide parking for and subsidize a car-sharing service for resort employees and/or patrons.
- Provide "end-of-trip" facilities for employees who bike to their work sites from outside of Squaw Valley, including showers, secure weather-protected bicycle

system between these resorts would be discontinued if the Gondola Project is implemented. DEIR/S at 2-10. Another strategy calls for the implementation of programs to better disperse the departures of skiers during peak afternoons through entertainment options and other incentives. *Id.* Yet, this strategy is entirely undefined and therefore would be impossible to enforce.

⁵ The DEIR explains that these measures are not mandatory to reduce the Project's air quality impacts to a less than significant level. Rather, the applicant would be able to select certain of these measures and demonstrate that the Project would not result in criteria air pollutant emissions in excess of 82 pounds per day. DEIR at 10-17.

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lockers, storage lockers for other gear, and changing spaces. This measure is consistent with measure TRT-5 in guidance published by the California Air Pollution Control Officers Association (CAPCOA 2010:234-236).

- Provide free transit passes or reimburse the transit costs of employees who commute from outside Olympic Valley using Tahoe Area Regional Transit or another transit service. This measure is consistent with measure TRT-4 in CAPCOA's guidance (CAPCOA 2010:230-233).
- Provide adequate secure weather-protected bicycle lockers or storage area for employees living at the East Parcel. The number of lockers or size of the storage area shall be adequate to meet the demand of employee residents.
- Provide virtual and/or real bulletin boards in common areas of employee housing units and other areas where employees congregate to foster the development of carpools and other ride sharing opportunities.

Adoption of these measures would go a long way toward reducing the Project's significant traffic impacts. Again, because these measures have been determined to be feasible, the County must require the applicant to adopt and implement enough of them to ensure that the Project's impacts would be mitigated to a less than significant level.

0166-28

6. The DEIR/S Fails to Adequately Analyze or Mitigate the Project's Air Quality Impacts.

The DEIR/S fails to fully analyze and disclose Project-related air quality impacts or to propose and evaluate feasible mitigation measures for each potentially significant impact. The DEIR/S acknowledges that Placer County is designated as a nonattainment area for the state and national ambient air quality ozone standards and for state PM10 standards. DEIR/S at 4.10-6. For this reason, one would expect the DEIR/S to contain a thorough analysis of Project-related and cumulative impacts to air quality. Instead, the DEIR/S's analysis of Project-related air quality impacts contains numerous deficiencies that must be remedied in order for the public and decision-makers to fully understand the Project's impacts. Specifically, the evaluation of the Project's air quality impacts must be revised to address: (1) failure to describe construction activities/disclose emissions; and (2) underestimation of construction emissions. These omissions are discussed in greater detail below.

Because the DEIR/S indicates that the three action alternatives differ only in their route alignment, such that construction activities would be the same for all three alternatives, the comments below apply to all three alternatives.

0166-27 cont'd, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0166-28, Air Quality (AQ)

The comment is a summary statement that identifies topics and issues that are discussed in more detail in subsequent comments. See Comments 0166-29 through 0166-36 for a more detailed identification of comments related to air quality, and the responses provided to each one of these comments.

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0166-29

(a) The DEIR/S Fails to Provide Important Details About Construction Activities.

The DEIR/S fails to describe aspects of construction activities that are critical to its analysis of emissions from these activities. For instance, the DEIR/S provides incomplete information about the amount of earth movement that would take place. The DEIR/S discloses that “fugitive dust emissions of PM10 and PM2.5 are associated primarily with grading during the site preparation phase.” DEIR/S at 4.10-14. In most cases, however, the DEIR/S provides the estimated area of disturbance only in square feet and acres and fails to indicate the *depth* of soil disturbance. *See, e.g.*, DEIR/S at 2-11 and 2-12. The missing information—the total amount of soil excavated—is essential because emissions result not only from the surface disturbance, but also from vehicles needed to move the material (whether on-site or off-site).

0166-30

Equally disturbing, it appears that Project construction emissions were estimated for only a portion of the earth movement necessary to construct the Project. Specifically, DEIR/S Appendix G indicates that the model inputs for earth moving used to estimate construction emissions were comprised of 5.50 acres and 7,500 cubic yards. DEIR/S Appendix G CalEEMod datasheets at 3. However, the DEIR/S indicates that the 7,500 cubic yards of fill only takes into account construction at the Alpine Meadows Base Terminal. DEIR/S at 2-10. Thus, the emissions model does not appear to have included earthmoving associated with construction at other Project locations, including Alpine Meadows Mid-Station, Squaw Valley Mid-Station, Squaw Valley Base Terminal, and at each of the 35 tower locations.

0166-31

In another example, the DEIR/S states that the Project involves construction of two buildings to store the gondolas when they are not in use—one on the Squaw Valley Base Terminal site and one on the Alpine Valley Base Terminal site. DEIR/S at 2-10, 2-12, 2-14. However, the document provides no details about construction of these buildings. Similarly, the DEIR/S lacks adequate data related to construction of the proposed towers. The DEIR/S provides no information as to the location of these structures or any details regarding their construction. The DEIR/S states only that “access and construction methods would vary depending on site conditions and location.” DEIR/S at 2-12. In both cases, the DEIR/S inappropriately defers the analysis and mitigation of the Project’s environmental impacts. *See* CEQA Guidelines § 15126.4(a)(1)(B); 40 CFR 1500.1(b). A revised analysis must include all pertinent information as to the size, location, and construction activities associated with the gondola storage structures and the towers.

0166-32

Finally, the DEIR/S estimates that the Project would result in the removal of up to 500 trees. DEIR/S at 4.11-11. The DEIR/S prohibits burning the felled trees (DEIR/S, Appendix B – Resource Protection Measures, RPM AQ-19 [“During construction, no open burning of removed vegetation shall be allowed.”]), but the document fails to describe the method for disposal of these trees. A revised analysis must specify whether the vegetation would be processed on-site or

0166-29, Air Quality (AQ)

The comment states that the Draft EIS/EIR fails to provide important details about construction activities. Specifically, the comment indicates that the construction analysis did not include the depth of soil excavation during grading and site preparation phases and did not account for emissions associated with vehicles needed to move the material.

As discussed in the Draft EIS/EIR, site preparation activities would be minimal and would include vegetation clearing and some ground disturbance. Grading activities proposed at the Alpine Meadows Base Terminal would require up to 7,500 cubic yards of fill. No other project elements would require import or export of fill. The construction assumptions are summarized in Appendix G of the Draft EIS/EIR based on the description provided in Chapter 2, “Description of Alternatives.”

Fugitive dust emissions from site preparation activities were estimated using CalEEMod, in accordance with PCAPCD recommendations. CalEEMod estimates dust emissions from grading equipment passes, truck loading, and bulldozing. Inputs for dust emission estimates include equipment type, daily equipment use, acreage of ground disturbance, and quantity of material to import or export.

To estimate dust emissions, the total disturbance area (i.e., 5.5 acres) was calculated based on project-specific information. CalEEMod applies fugitive dust emissions factors for grading equipment (i.e., dozers, scrapers, graders, crawler tractors) based on the number of acres per day each piece of equipment is capable of grading, on average, based on construction survey data. In addition, CalEEMod also estimates the amount of fugitive dust associated with the use of dozers based on the number of hours a dozer operates in a given day. Further, dust emissions were also estimated based on material quantities during loading/unloading activities using the tons of material to be imported. As shown in Appendix G of the Draft EIS/EIR, 7,500 cubic yards of fill would be needed. CalEEMod converts cubic yards to tons to apply this emission factor. This amount of material was entered into the model and used to estimate fugitive dust emissions from movement of material. The emissions factors and methods used by CalEEMod are approved by PCAPCD and capture the primary emission-generating construction activities. Further, it should be noted that the assumptions for daily equipment use in CalEEMod are conservative. Considering that conservative emission factors were used, maximum daily emissions were

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reported, and all sources of dust emissions were modeled, the Draft EIS/EIR does adequately evaluate and report dust emissions associated with site preparation and grading/earthmoving activities. In addition, the inputs/assumptions discussed above are also used by the modeling software to generate exhaust emissions. The items brought up by the comment would not alter the PCAPCD approved methods for calculating fugitive dust emissions or the results provided in the Draft EIS/EIR.

0166-30, Air Quality (AQ)

The comment asserts that emissions from earth movement were only estimated from construction of the Alpine Meadows Base Terminal and not from earthmoving associated with the Alpine Meadows Mid-Station, Squaw Valley Mid-Station, Squaw Valley Base Terminal, and the 35 tower locations.

As discussed in Chapter 2, "Description of Alternatives," of the Draft EIS/EIR, only the Alpine Meadows Base Station would require substantial earth moving. In all other locations, minimal ground disturbance would occur. As shown in Appendix G of the Draft EIS/EIR, the total disturbance area was calculated to be 5.5 acres, which accounts for ground disturbance at all project components. As explained in the response to Comment 0166-29, CalEEMod estimates dust emissions based on the number/type of equipment and acreage of ground disturbance. The estimated quantity of fill material (i.e., 7,500 cubic yards) that would be required for the entire project has also been accounted for in the dust emissions calculations. No further analysis is necessary.

0166-31, Air Quality (AQ)

The comment states that the Draft EIS/EIR did not provide details about the construction of proposed buildings, lacks adequate details related to construction of the proposed towers, and does not provide information of tower location. The comment also states that the Draft EIS/EIR defers the analysis and mitigation of the project's impacts. However, the comment provides no nexus between the asserted lack of detail and the impact analysis.

Page 4.10-14 of the Draft EIS/EIR includes construction details such as construction schedule, construction activities that

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would take place (e.g., site preparation, vegetation clearing, building construction, blasting, helicopter use, and tree removal), and identifies all components of the project that were evaluated (e.g., base terminals, mid-stations, lift towers, etc). The discussion further identifies the locations of proposed equipment staging areas and helicopter landing zones.

Emissions modeling was conducted using project-specific information and anticipated building sizes and material excavation/movement quantifies. Assumptions used for the construction modeling are included in detail in Appendix G of the Draft EIS/EIR. PCAPCD-approved modeling software CalEEMod was used to conduct the construction analysis that uses conservative assumptions associated with the use of heavy-duty equipment, worker commute trips, vendor deliveries, and material hauling. The estimated emissions were based on the total anticipated construction disturbance area and building sizes, as shown in Appendix G of the Draft EIS/EIR.

The location of the proposed towers does not affect the results of the air emissions because emissions are estimated based on inputs described above, that do not depend on specific location within the overall disturbance area. Nonetheless, the number of towers, and their approximate location, by alternative, are shown in Exhibit 4.9-1 and based on the best available information at the time the Draft EIS/EIR was prepared. As the Draft EIS/EIR states with respect to tower locations:

Towers

A total of 35 towers would be installed along the gondola alignment under Alternative 2, with 24 on private land and 11 on NFS lands. The project applicant has provided preliminary tower locations that are used in this EIS/EIR; however, exact locations and designs for each tower have not been determined at this time. Determination of exact tower placement will be part of final project engineering and design once a single alternative has been selected (i.e., if an alternative is approved at the conclusion of the NEPA/CEQA process). On NFS lands, final engineering and design will require consultation with the Forest Service hydrologist/soil scientist and other technical specialists as appropriate. Placer County will have a similar role in final engineering and design on non-NFS lands. Four "tower zones" (Zones A, B, C, and D) have been delineated in Exhibits 2-3, 2-4, 2-5, and 2-6 to highlight areas with similar site conditions for tower

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placement. Details about tower construction are discussed below.

(Draft EIS/EIR, page 2-12.)

As this passage indicates, the exact placement of each tower has not been determined for the proposed project. The same is true with respect to Alternatives 3 and 4. (See Draft EIS/EIR, pp. 2-27-2-28.)

For additional information on the feasibility of identifying the precise location of towers, please see response to comment 0166-5. Specific locations will be finalized based on site-specific conditions and engineering requirements during the final design phases. However, air emissions have considered the construction activities associated with all of the proposed project components. Therefore, the emissions do accurately represent all anticipated construction activities and no additional analysis is necessary.

0166-32, Air Quality (AQ)

The comment states that the Draft EIS/EIR failed to describe the method for disposal of trees that would be removed during project construction and recommends that a revised analysis should be included that explains whether the vegetation would be processed on-site or hauled off site.

The discussions of Impact 4.12-3 in the Draft EIS/EIR provide an estimate of the number of trees removed under each alternative, up to 328 trees under Alternative 2, up to 237 trees under Alternative 3, and up to 214 trees under Alternative 4. Marketable trees would be removed for processing into lumber. As described on page 2.13 of the Draft EIS/EIR, "tree removal would be accomplished via helicopter, skidding, hauling off-site, chipping, or lop-and-scatter, depending on the specific site conditions and accessibility." RPMs TREE-1 through TREE-12 provide numerous details on methods of tree removal and treatment of slash and other non-marketable materials.

The comment is correct that emissions associated with tree removal were not quantified. In response, an additional analysis that quantifies emissions associated with truck hauling is provided. To provide a conservative estimate, the maximum total number of trees that could be removed under any alternative, 328 trees under Alternative 2, was rounded up to 350 trees. Based on project-specific arborist's survey data, the average tree diameter on the project site is 17 inches. Based

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on a study conducted by the University of Arkansas, conifer trees with a diameter of 17 inches can weigh 3,344 pounds (2013). A logging truck was assumed to have a capacity of 26 tons (USDA 2004). Thus, 350 trees would result in 585 tons of haul material requiring up to 23 truckloads. Assuming each truck leaves the site full and returns empty, a total of 46 truck trips would be required. Using CalEEMod and the construction material hauling component, tree hauling could result in maximum daily emissions during the site preparation phase of 0.23 lb/day of ROG, 0.9 lb/day of NO_x, 0.06 lb/day of particulate matter (PM₁₀), and 0.02 lb/day of fine particulate matter (PM_{2.5}). When combined with reported construction emissions in Table 4.10-5 of the Draft EIS/EIR, maximum daily emissions would still not exceed any PCAPCD threshold of significance. Calculations are provided in Appendix G of the Final EIS/EIR. The discussions of Impact 4.10-1, "Short-Term, Construction-Generated Emissions of ROG, NO_x, PM₁₀, and PM_{2.5}" are adjusted for all action alternatives to incorporate these additional emissions.

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hauled off-site. Then, it must calculate the emissions from any equipment used for chipping/spreading or incinerating trees, or from any trucks used to haul trees off-site.

0166-33

(b) The DEIR/S Underestimates Construction Emissions.

In addition to the omissions discussed above, the DEIR/S's analysis of construction emissions relies on improper and inaccurate assumptions. First, the DEIR/S relies on the CalEEMod model for Project emission estimates. DEIR/S at 4.10-9. But this model fails to take into account several Project elements that would add substantially to projected construction emissions. Specifically, the CalEEMod model does not appear to account for emissions from site preparation, all earthmoving activities, and blasting. As discussed further below, these activities would result in potentially significant emissions that may exceed the Placer County Air Pollution Control District's (PCAPCD) significance thresholds.

For example, before construction and paving can occur, a construction site must be properly prepared. This activity includes demolition, site preparation, and grading. Demolition involves removing existing structures or paving; site preparation involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading; and grading involves the cut-and-fill of land to ensure that the proper base and slope are created for the foundation.⁶ The Project site areas where the towers would be located are predominantly in roadless, undisturbed areas and would require significant site preparation. DEIR/S at 4.10-14. Yet, the DEIR/S appears to only account for emissions associated with grading and omits emissions associated with site preparation. DEIR/S Appendix G, CalEEMod Data Tables at 3. A revised analysis must disclose these emissions and identify feasible mitigation to minimize the impacts.

0166-34

Second, as discussed above, the DEIR/S fails to include all emissions associated with earthmoving. Moving the cut and fill around on site results in fugitive dust emissions, as this activity involves dumping materials, spreading materials around the site or onto storage piles, and loading out from storage piles onto a truck or with a front-end loader. These emissions must be included in a revised analysis.

0166-35

Third, the DEIR/S states that "some" rock-blasting using explosives may be required to prepare the Project site for development. DEIR/S at 2-11 and 4.10-14. The DEIR does not provide an estimate for how much rock would have to be blasted, stating only that, "some blasting may be required to remove outcroppings during terminal, mid-station, and lift tower construction." DEIR/S at 4.10-14. The DEIR/S goes on to state that if blasting is used, "some minimal fugitive dust emissions could occur depending on the size of the blast and material

⁶ See California Air Pollution Control Officers Association, CalEEMod User's Guide, Version 2016.3.2, p. 31; available at: <http://www.calcemod.com/>, accessed November 15, 2017.

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0166-32 cont'd, Air Quality (AQ)

0166-33, Air Quality (AQ)

The comment states that the Draft EIS/EIR underestimates construction-related air emissions from site preparation/demolition, earthmoving activities, and blasting. Demolition is not proposed, so no additional analysis is needed for this construction activity. Emissions associated with site preparation, grading, and earthmoving were evaluated in detail, as explained in response to comment 0166-29. Additional comments were received related to blasting activities and are addressed in responses to comments 0166-35 and 0166-36. The construction emissions analysis is consistent with the methodology recommended by the PCAPCD, the agency with regulatory authority over air quality in the project area.

0166-34, Air Quality (AQ)

The comment states that the DEIS/DEIR does not quantify all emissions associated with earthmoving activities. Emissions associated with site preparation, grading, and earthmoving were evaluated in detail, as explained in response to comment 0166-29. No additional analysis is necessary.

0166-35, Air Quality (AQ)

The comment states that the Draft EIS/EIR did not specifically quantify air emissions from blasting that would be required during construction activities.

The comment is correct that emissions were not quantified specifically for this individual activity. Blasting emissions were not quantified because they typically represent a negligible portion of the overall project emissions for a construction project. In addition, blasting emissions depend on site specific conditions, not available at the time the Draft EIS/EIR was prepared. Nonetheless, to provide complete disclosure, criteria air pollutant, oxides of nitrogen (NOx) were quantified using U.S. Environmental Protection Agency (EPA) AP-42 Emission Factors for Explosive Detonation, included in Chapter 13. Miscellaneous Sources (EPA 1980). The U.S. EPA has developed emissions factors for explosives (e.g., ANFO and

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trinitrotoluene [TNT]) for CO, methane, NO_x, and H₂S, among other pollutants. The EPA AP-42 Emission Factors for Western Surface Coal Mining, included in Chapter 11. Mineral Production Industry (EPA 1998) were used to quantify the emissions of PM₁₀ and PM_{2.5} from the use of explosives to break up rock for gondola construction.

Using emission factors for NO_x, one ton of explosives would result in 17 pounds of NO_x. Blasting takes considerable preparation and planning and is only used in areas where other more typical construction methods are infeasible. The areas where blasting could potentially be needed are minimal in comparison to the entire site and therefore, large quantities of explosives would not be used. As a conservative assumption, based on typical blasting activities occurring on construction sites in one day, 1,000 pounds of explosives would be more than enough to complete construction for the gondola (SE Group pers. comm.). Assuming, very conservatively, that 1,000 pounds of explosives were used in a single day (which is highly unlikely for this particular project), that would result in 8.5 pounds of NO_x emissions. Combining these emissions with the maximum daily emissions reported in Table 4.10-5, would result in 76.7 pounds/day of NO_x emissions, still below the PCAPCD threshold of 82 pounds/day. It should be noted that this emissions scenario assumes that the maximum blasting, helicopter use, and all grading/site preparation activities are occurring on one single day. This level of intensity is not anticipated, and is likely impossible due to safety protocols for keeping personnel and equipment at safe distances from blasting, and therefore this analysis is conservative. See Appendix G of the Final EIS/EIR for calculations.

Regarding particulate matter, the EPA uses a formula of 0.000014 lbs of total particulate matter less than 30 microns in diameter generated per a square foot of area exposed to blasting (EPA 1998). Of this total particulate matter generated, 52 percent is comprised of PM₁₀ and 3 percent is comprised of PM_{2.5}. Using this EPA data, a blast breaking up material over an acre area would generate 0.317 lbs of PM₁₀ (43,560 square feet X 0.000014 lbs total particulate generated per square foot X 0.56 of total particulates comprised of PM₁₀) and 0.018 lbs of PM_{2.5} (43,560 square feet X 0.000014 lbs total particulate generated per square foot X 0.03 of total particulates comprised of PM_{2.5}). Using an extreme scenario of 4-acres of area being blasted in the same day for gondola construction (which exceeds the combined disturbance areas of all towers and the Alpine Meadows and Squaw Valley mid-

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stations provided in Table 2-2 of the Draft EIS/EIR), this would generate approximately 1.27 lbs of PM10 and 0.07 lbs of PM2.5. Even under this extreme blasting scenario, construction emissions of PM10 would stay well below 10 lbs/day with the PCAPCD threshold being 82 lbs/day (See Table 4.10-6 in the EIS/EIR). PCAPCD does not provide a threshold for PM2.5; however, the existing emissions estimate in EIS/EIR Table 4.10-6 is 1.8 lbs/day and adding 0.07 lbs would increase the emissions by approximately 3.9%. As stated above, this is an extreme blasting scenario, the actual blasting disturbance area would be smaller than 4-acres (e.g., not all tower footings are expected to require blasting for installation), and for safety and purely logistical reasons (distance between blasting sites), not all blasting would occur on the same day. In addition, a number of RPMs have been included in the project that would reduce dust emissions by requiring the preparation and approval of a dust control plan (RPM AQ-10) in addition to other measures that would ensure onsite dust is controlled. Therefore, if estimates of PM10 and PM2.5 emissions from blasting were included in the EIS/EIR, it would not change the impact analysis or conclusions.

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being blasted.” DEIR/S at 4.10-15. However, the DEIR/S provides no details, let alone any support for the claim that emissions would be “minimal.”

Blasting and drilling the charge holes for placement of explosives generate emissions of fugitive dust, including particulate matter (“PM10” and “PM2.5”). Significantly, Placer County is in nonattainment with state ambient air quality standards for PM10 and PM2.5. DEIR/S at 4.10-6. Further, the detonation of explosives generates emissions of nitrogen oxides (“NOx”), carbon monoxide (“CO”), and sulfur oxides (“SOx”), among others. *See*, <https://www.irmi.com/articles/expert-commentary/construction-blasting-fundamentals>. CalEEMod does not estimate emissions associated with blasting and the DEIR/S does not provide separate emission estimates for blasting.

Depending on the amount of blasting, emissions associated with blast hole drilling and explosives could be substantial and may lead to an exceedance of the PCAPCD’s thresholds of significance for NOx and particulate matter. The DEIR/S indicates that blasting may take place at all Project locations, including at any of the 35 tower sites. DEIR/S at 4.1-15. By failing to estimate emissions associated with the blasting required to prepare the Project site, the DEIR/S fails to identify potentially significant impacts on air quality. As a result of this omission, it fails to require adequate mitigation.

0166-36

In sum, the DEIR/S provides an incomplete description of construction activities related to the Project and an inadequate analysis of related air quality impacts, in violation of CEQA and NEPA.

0166-37

7. The DEIR/S Fails to Adequately Analyze or Mitigate the Project’s Greenhouse Gas Impacts.

Analysis of greenhouse gas (GHG) emissions is essential under CEQA and NEPA. Scientists agree that existing conditions are such that we have already exceeded the capacity of the atmosphere to absorb additional GHG emissions without risking catastrophic and irreversible consequences. Therefore, even seemingly small additions of GHG emissions into the atmosphere must be considered cumulatively considerable. *See Communities for Better Environment v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 120 (“the greater the existing environmental problems are, the lower the threshold for treating a project’s contribution to cumulative impacts as significant.”); *see also Center for Biological Diversity v. National Highway Traffic Safety Admin.* (9th Cir. 2007) 508 F.3d 508, 550 (“we cannot afford to ignore even modest contributions to global warming.”).

0166-38

This DEIR/S concludes that the Project would result in less-than-significant impacts related to greenhouse gas emissions. DEIR/S at 2-35 and 4.11-10. However, as detailed above, the DEIR/S presents an incomplete description of the Project and its construction activities, which results in a flawed greenhouse gas analysis. The DEIR/S underestimates the Project’s

0166-35 cont'd, Air Quality (AQ)

0166-36, Air Quality (AQ)

This comment is a summary of the detailed comments above related to air quality. See detailed responses to comments 0166-29 through 0166-35 above. No further response is necessary.

0166-37, Greenhouse Gases (GHG)

The comment states that the Draft EIS/EIR fails to adequately analyze or mitigate the project’s GHG impacts and that even seemingly small additions of GHG emissions must be considered cumulatively considerable. This comment introduces the topic of GHG emissions, but does not address the content, analysis, or conclusions in the Draft EIS/EIR.

Emissions associated with construction and operation of the project are shown, by source, in Table 4.11-1 of the Draft EIS/EIR. Construction activities that were evaluated included site preparation, grading, building construction, and mobile-sources from worker commute, vendor deliveries, and material hauling activities. Operational-related emissions included increases in vehicle traffic associated with increased skier days, operation of the gondola, and long-term maintenance activities.

As discussed on page 4.11-9, PCAPCD has adopted construction thresholds of significance of 10,000 metric tons of carbon dioxide equivalent CO₂e/year and operational thresholds of significance of 1,100 MT CO₂e/year (PCAPCD 2016). In accordance with PCAPCD guidance, projects that exceed these thresholds are said to have a cumulatively considerable contribution to climate change. Discussions for Impact 4.11-2 (Alt.2), Impact 4.11-1 (Alt. 3), and Impact 4.11-1 (Alt. 4) compared project construction and operational emissions to these thresholds and were shown to not exceed either threshold. For these reasons, the conclusion of less than significant regarding GHG emissions is accurate. No further analysis or mitigation is necessary.

0166-38, Greenhouse Gases (GHG)

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The comment asserts that the GHG analysis is incomplete and does not include emissions estimates from blasting and from tree removal activities. The comment references previous comments related to the project description. See responses to those comments above related to this topic.

The comment is correct that emissions from blasting and off-hauling of trees were not included in the GHG analysis. Regarding blasting, typically an ammonium nitrate and fuel oil (ANFO) mixture is used to remove rock. Explosives of this type create a deficiency in oxygen resulting in emissions of carbon monoxide (CO), particulate matter, nitrogen oxides (NO_x), methane (a GHG), hydrogen sulfide (H₂S), hydrogen cyanide, and ammonia (EPA 1980).

Blasting emissions were not quantified because they typically represent a negligible portion of the overall project emissions for a construction project. In addition, blasting emissions depend on site specific conditions, not available at the time the Draft EIS/EIR was prepared. Nonetheless, to provide complete disclosure, methane emissions were quantified using U.S. Environmental Protection Agency (EPA) AP-42 Emission Factors for Explosive Detonation, included in Chapter 13. Miscellaneous Sources (EPA 1980). The U.S. EPA has developed emissions factors for explosives (e.g., ANFO and trinitrotoluene [TNT]) for CO, methane, NO_x, and H₂S.

Of the above mentioned emissions, methane is considered a GHG. Using emission factors for methane, one ton of explosives would result in 1.1 pound of methane. To illustrate how minimal these emissions are, using an extremely high hypothetical scenario (well above anticipated actual explosives use) of one thousand pounds of explosives used for each day of construction (i.e., 200 days), a total of 100 tons of explosives would be used, resulting in 1,430 pounds of methane over the construction period. Converting these emissions to metric tons of CO₂E, results in an additional 16.2 MTCO₂E. See Appendix G of the Final EIS/EIR for calculations.

Regarding the off-hauling of removed trees, emissions were quantified as discussed in the response to Air Quality comment 0166-32. Annual GHG emissions associated with tree off-hauling would result in less than 2 MTCO₂E for the entire construction period. Combining emissions from blasting and tree hauling to the construction emissions reported in Table 4.11-1 would result in a new total of 587 MTCO₂E, which is still below the PCAPCD threshold of 10,000 MTCO₂E/year. No changes to the analysis or additional mitigation is necessary.

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cont'd

GHG emissions because it fails to adequately evaluate emissions from construction activities. For example, explosives detonation results in emissions of GHGs, including carbon dioxide ("CO₂"), yet the DEIR/S does not take these emissions into account. Similarly, the document does not account for emissions from equipment needed for tree removal, and chipping and spreading or incinerating the 500 felled trees. While the DEIR's proposed mitigation (RPM AQ-17 and AQ-18) would prohibit the use of diesel generators and limit idling time for diesel-powered equipment, it fails to address GHG emissions resulting from blasting and tree removal operations. A revised analysis must account for, and mitigate, all Project-related GHG emissions.

0166-39

Finally, the DEIR/S fails to analyze the Project's consistency with relevant state plans, policies and regulations adopted for the purpose of reducing greenhouse gas emissions. As we pointed out in comments submitted on the Notice of Preparation for the Project, the DEIR/S must specifically analyze how the Project would comply with the state's long-term goals for greenhouse-gas emissions reductions, including those set forth in AB 32, the Global Warming Solutions Act of 2006, and Executive Orders S-3-05 and B-30-15. The DEIR/S must also analyze whether the Project would be inconsistent with any sustainable-communities strategy adopted for the region pursuant to SB 375.

0166-40

8. The DEIR/S Provides an Incomplete and Flawed Analysis of the Project's Growth-Inducing Impacts.

Both CEQA and NEPA require an analysis of a project's potential to induce growth. CEQA Guidelines § 15126(d); 40 CFR § 1508.8(b). A proposed project is considered either directly or indirectly growth-inducing if it: (1) fosters economic or population growth or additional housing; (2) removes obstacles to growth; (3) taxes community services or facilities to such an extent that new services or facilities would be necessary; or (4) encourages or facilitates other activities that cause significant environmental effects. While the growth-inducing impacts of a project need not be labeled as adverse, the secondary impacts of growth (e.g., loss of open space/habitat/ agricultural lands, air quality, transportation, etc.) may be significant and adverse. In such cases, the secondary impacts of growth inducement must be disclosed as significant secondary or indirect impacts of the project.

The Court of Appeal in *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, set out the general framework for considering population-related impacts under CEQA. An EIR

should, at a minimum, identify the number and type of housing units that persons working within the [p]roject area can be anticipated to require, and identify the probable location of those units. The [EIR] also should consider whether the identified communities have sufficient housing units and sufficient services to accommodate the anticipated increase in population. If it is concluded that the

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0166-38 cont'd, Greenhouse Gases (GHG)

0166-39, Greenhouse Gases (GHG)

The comment suggests that the GHG analysis should specifically evaluate how the project would comply with the State's long-term goals for greenhouse gas emissions reduction, including those set forth in Assembly Bill 32, the Global Warming Solutions Act of 2006, and Executive Orders S-3-05 and B-30-15, as well as any sustainable communities strategies adopted pursuant to Senate Bill 375.

As discussed on page 4.11-9, PCAPCD has adopted thresholds for determining the significance of GHG impacts. As discussed in the PCAPCD CEQA Thresholds Justification Report (October 2016), the District conducted a rigorous analysis to establish thresholds of significance for construction and operations emissions. As stated on page 14 of the report, the thresholds were developed considering:

The GHG significant thresholds adopted by other air districts. The historical CEQA projects reviewed by the District over the last thirteen years (2003 to 2015). The applicable statewide regulatory requirements by 2030. The special geographic features in Placer County.

As implied by the list of considerations, state policy (regulatory requirements) were included in the formation of thresholds. The PCAPCD established construction thresholds of 10,000 metric tons of CO₂e/year and operational thresholds of significance of 1,100 MT CO₂e/year. In accordance with PCAPCD guidance, projects that exceed these thresholds are said to have a cumulatively considerable contribution to climate change and could potentially conflict with State reduction efforts and adopted plans. Thus, projects that do not exceed these thresholds, would not conflict with established State reduction strategies and plans. Discussions for Impact 4.11-2 (Alt.2), Impact 4.11-1 (Alt. 3), and Impact 4.11-1 (Alt. 4) compared project construction and operational emissions to these thresholds and were shown to not exceed either. In fact, both construction (a total of 568 MT CO₂e) and operations (755 MT CO₂e/year) emissions would be less than the 1,100 MT CO₂e/year established for operations, which is the most stringent of the two thresholds. Further, as discussed on page 4.11-11, Squaw Valley Ski Holding is currently finalizing contracts with Liberty Utilities and seeking approval from the California Public Utilities Commission to secure 100 percent of

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the electricity demands of their operations from renewable sources. Procuring renewable energy sources and reducing overall operational GHG emissions is consistent with the State's overall GHG reduction strategy. For these reasons, the conclusion of less than significant regarding GHG emissions is accurate. No further analysis or mitigation is necessary.

Regarding consideration of the Sacramento Area Council of Governments (SACOG) sustainable community strategy (SCS), the project is neither covered by nor excluded by the SCS. While it is, in effect, a transportation project, the project does not rely on public funding and is not included on the list of transportation projects covered by the SCS. The gondola would, however, serve one of the projects listed in the SCS, the Squaw Valley Village Specific Plan, which is forecasted in the SCS to provide 750 housing units within the 2035 planning horizon. (SACOG 2016). By providing a gondola between Squaw Valley, where the housing units would be built, and Alpine Meadows, which is part of the ski resort, it is clear the gondola would reduce vehicle-miles traveled between the resorts. For this reason, even if the SCS does not specifically contemplate the project, the project is not inconsistent with the SCS.

0166-40, Other NEPA/CEQA Analysis (ONCA)

The comment describes CEQA and NEPA requirements associated with growth-inducing impacts. These are discussed in Section 5.2.3, "Growth-Inducing Impacts," in the Draft EIS/EIR. The comment further states that the Draft EIS/EIR provides an incomplete and flawed analysis of the project's growth-inducing impacts. This statement provides a summary of detailed comments provided below, but does not specify what is incomplete or flawed in the analysis. See responses to the detailed comments below that address this statement.

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cont'd

communities lack sufficient units and/or services, the [EIR] should identify that fact and explain that action will need to be taken

Id. at 370; *see also* CEQA Guidelines Appx. G § XII(a) (directing analysis of whether project would induce substantial population growth; Guidelines § 15126.2(d) (“Discuss the ways in which the proposed project could foster economic or population growth” and “EIR “discuss the characteristic of [the] project[] which may encourage and facilitate other activities.”). NEPA has similar requirements. *See* 40 C.F.R. § 1508.8(b) (requiring EIS to address indirect effects that are “reasonably foreseeable,” including effects related to “population density or growth rate”); *City of Davis v. Coleman* (9th Cir. 1975) 521 F.2d 661, 680-681 (finding an EIS inadequate for failure to include a “detailed discussion of the project’s probable impact on growth, land use or the planning process in the area,” an “estimate of the increased demand for . . . city services which increased population would occasion,” or indication that the effects on community cohesion and the tax base [had] been studied”). Once the EIR/S determines the action needs to provide sufficient housing and/or services, CEQA and NEPA require it to examine the environmental consequences of such action. *See Napa Citizens*, 91 Cal.App.4th at 373 (EIR must disclose “environmental consequences of tapping” water resources needed to serve growing population); *Stop H-3 Assoc. v. Dole* (9th Cir. 1984) 740 F.2d 1442, 1461-1462 (finding the indirect effect discussion in an EIS adequate because it included “reasonably sufficient data for decisionmakers to take the requisite ‘hard look’ at the environmental consequences”).

0166-41

Here, while the DEIR/S acknowledges the Project will involve 6-8 months of construction and that the “project is expected to result in approximately 7,371 additional visitor-days per month” (DEIR/S at 5-13), the document has not properly evaluated the environmental impacts from this growth and related indirect growth. For example, the project applicant has acknowledged that the linkage of ski terrain at Squaw and Alpine is key to making Squaw Valley a “World Class” all-season resort, and that this feature is sure to attract many new visitors to the area. Yet new people coming to the area, drawn by the Project and the economic activity it creates, will require housing and services. Providing housing and services will have environmental impacts, and CEQA requires analysis of those impacts. The DEIR/S, however, fails to provide an accurate estimation of the new growth or a proper analysis of its environmental consequences. Rather, it simply assumes, based on no evidence or analysis, that existing housing and services will be sufficient. *See* DEIR/S at 5-12 to 5-13.

If the gondola serves its intended purpose to help bring visitors to the area and make Squaw/Alpine a “World-Class” resort, the Project will expand the economic base of the area and spur visitation and development beyond the immediate project. New shops and restaurants will open to serve visitors. Resort employees will have more money to spend, and local businesses will grow. Further, many visitors to the Project will not limit themselves to day use of Squaw and Alpine, as the DEIR/S suggests. Rather, they will likely extend their visit to other top attractions, like Lake Tahoe. Lake Tahoe, however, is reaching its environmental carrying

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0166-40 cont'd, Other NEPA/CEQA Analysis (ONCA)

0166-41, Other NEPA/CEQA Analysis (ONCA)

Consistent with NEPA and CEQA, and as explained below, the Draft EIS/EIR discusses the ways in which the project could foster economic or population growth, either directly or indirectly.

Specifically, the Draft EIS/EIR discusses the project's growth-inducing potential in two categories: growth caused by project-related employment and growth as a result of increased resort visitation (see pages 5-11 through 5-13). Project-related employment is further broken down by short-term construction employment (30 to 40 workers during peak construction over a 6-to 8-month construction period) and long-term operational employment (two new full-time, year-round employment positions and eight full-time, seasonal positions; or five full time equivalent employees [FTEEs]).

For both construction and operational employment, the Draft EIS/EIR states that this employment is expected to be accommodated by the existing workforce in the project vicinity. The Draft EIS/EIR also acknowledges that some construction personnel could be brought in from outside the region; however, the jobs would be temporary (one construction season) and, thus, employment attributable to the project would not reasonably be expected to generate population growth or demand for new housing.

In terms of increased resort visitation, SE Group and RRC Associates prepared a report evaluating the anticipated changes to annual snow sports visitation as a result of the project (SE Group and RRC Associates 2018). This report is discussed in several places in the Draft EIS/EIR, including Chapter 2, “Descriptions of Alternatives,” and Sections 4.1, “Recreation,” 4.4, “Land Use,” 4.5, “Socioeconomics and Environmental Justice,” 4.7, “Transportation and Circulation,” and 5.2.3, “Growth-Inducing Impacts.” As discussed in this report, the project is expected to result in approximately 7,371 additional visitor-days per month (or approximately 246 visitors per day), and these additional visitors would be limited to short-term visits (i.e., a day or days) during the operating (winter season) (SE Group and RRC Associates 2018). The Final EIS/EIR analysis of growth induced by the project describes the temporary and short-term nature of these visits, and states that this increase in visitation would not increase the long-term,

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permanent population of the area. The Final EIS/EIR discusses indirect growth and concludes that existing commercial services (e.g., hotels, gas stations, retail stores) in the vicinity are available to serve peaks in winter visitation. That is, commercial services are geared towards having sufficient capacity to serve peak, or near peak, winter populations (e.g., weekends and holidays). As described in the SE Group and RRC report, there are existing factors that limit peak levels of visitation to Squaw Valley and Alpine Meadows, with the primary factor being parking capacity. Therefore, increased visitation attributable to the proposed project would be added during non-peak days/periods when there is "capacity" for additional visitors. Therefore, daily visitation numbers would not exceed existing peak visitation numbers that retail services are already capable of serving. Thus, the project's increased visitation would not result in substantial indirect growth in the area; as stated under Impact 4.5-1 (Alt. 2) in the Final EIS/EIR, indirect growth would be marginal given the scale of overall snowsports visitation at Squaw Valley and Alpine Meadows and in the greater Lake Tahoe region. This is supported by the fact that anticipated increase in visitation resulting from Alternative 2 is within the existing range of variability for total annual snowsports visitation at Squaw Valley and Alpine Meadows resulting from factors such as variations in annual snowfall, national/regional demographic trends, and the competitive marketplace (SE Group and RRC Associates 2018).

The Draft EIS/EIR also discusses how the project may encourage and facilitate activities that, either individually or cumulatively, would affect the environment, including the potential for an increase in visitor population that may impose new burdens on existing facilities (e.g., recreation facilities, transportation facilities, water supply). These types of impacts are evaluated throughout the Draft EIS/EIR.

It bears noting that, while the project is intended to enhance the visitor wintertime experience at both Squaw Valley and Alpine Meadows, the project would only operate in the winter and, therefore, would only generate increased visitation in the winter. While the project is expected to result in employment growth, employment needs would be minor, achieved by the existing area workforce, and would primarily be seasonal (as described above).

The comment states that existing housing or services would not be sufficient to support the project's increased visitation. No information is provided to support this statement. The comment

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correctly notes that the project is intended to enhance the visitor experience at both resorts, and while this could expand the economic base of the area (as discussed in the Visitation and Use Assessment [SE Group and RRC Associates 2018], discussed above), these indirect effects are evaluated in Sections 4.5 and 5.2.3 of the Draft EIS/EIR.

Finally, the comment states that project visitors will likely extend their visit to other attractions, such as Lake Tahoe, which could lead to significant environmental impacts to the Lake Tahoe Basin, including degradation of lake clarity and water quality. This issue was not addressed in the Draft EIS/EIR for the reasons described on page 4.17-24 of the Draft EIS/EIR. In summary, indirect effects on Lake Tahoe water quality associated with additional vehicular trips to and from the Lake Tahoe Basin would be minor and would be below thresholds established for the protection of lake water quality. The gondola project is expected to generate only a small amount of VMT in the Lake Tahoe Basin, and only in winter; therefore, the project would not cause VMT to exceed carrying capacity thresholds (see page 4.17-24 of the Draft EIS/EIR for further discussion).

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capacity and any additional induced visitors to that sensitive area would likely result in a significant environmental impact, as there is a known link between vehicle miles traveled and environmental impacts to the Lake Tahoe Basin, including degradation of Lake clarity and water quality. See, e.g., Exhibit I (comment letter of the Tahoe Regional Planning Agency on the Squaw Valley Specific Plan Draft EIR). In brief, cars generate fine sediment and tailpipe emissions that directly contribute to algae increase in the Lake.⁷

0166-42

Finally, conservationists also flag the role of the project in providing new “growth-inducing” infrastructure, which could encourage new development in a treasured alpine landscape. That’s because the gondola would not only connect to the existing Alpine Meadows development and proposed development in Squaw Valley, it would also connect with a new development proposed for the White Wolf property in between the two resorts.

Although details remain scarce, would-be White Wolf developer Troy Caldwell has submitted initial plans to build 38 luxury homes, a ski lift, a lodge, tennis courts, and equestrian facilities – with a connection to the new gondola as a central amenity.

0166-43

Ignoring these alarming facts, the DEIR/S simply jumps to the unsupported conclusion that despite the draw the gondola is intended to create at these resorts, the Project would not induce any notable indirect growth in the area that would result in significant impacts. CEQA and NEPA require more.

0166-44

C. The DEIR/S’s Analysis of Alternatives Is Inadequate.

A proper analysis of alternatives is essential to comply with CEQA’s mandate that significant environmental damage be avoided or substantially lessened where feasible. Pub. Res. Code § 21002; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); *Citizens for Quality Growth v. City of Mount Shasta* (1988), 198 Cal.App.3d 433, 443-45. As stated in *Laurel Heights I*, “[w]ithout meaningful analysis of alternatives in the DEIR, neither the courts nor the public can fulfill their proper roles in the CEQA process . . . [Courts will not] countenance a result that would require blind trust by the public, especially in light of CEQA’s fundamental goal that the public be fully informed as to the consequences of action by their public officials.” 47 Cal.3d at 404 (1998). The discussion of alternatives must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the

⁷ See, e.g., Final Tahoe Total Maximum Daily Load Report. November 2010. Prepared by California Regional Water Quality Control Board, Lahontan Region and Nevada Division of Environmental Protection. Source Analysis. p.7-8. Available at https://www.waterboards.ca.gov/lahtontan/water_issues/.../tmdl/lake_tahoe/.../tahoe_tmdl.pdf (Excerpts attached hereto as Exhibit J); *Fugitive Dust Emissions from Paved Road Travel in the Lake Tahoe Basin*, attached hereto as Exhibit K.

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0166-41 cont'd, Other NEPA/CEQA Analysis (ONCA)

0166-42, Other NEPA/CEQA Analysis (ONCA)

The proposed White Wolf development is included in the list of cumulative projects (Table 3-3 and Exhibit 3-1) in the Draft EIS/EIR. Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated by resource topic in Sections 4.1 through 4.17. Development of the proposed Gondola project would be separate and independent from the proposed White Wolf development.

Under Alternatives 3 and 4, residents and guests of the White Wolf development would be able to access the ski resorts via the Alpine Meadows mid-station. Such access may provide a desirable amenity to such residents, and may therefore make residences in the White Wolf development more valuable than they would be without such access. The additional value provided by such access, however, is speculative. In addition, it is speculative whether, by providing such access, the project would make the White Wolf development project more economically feasible than would otherwise be the case. The project does not provide access or other infrastructure to the White Wolf development. In this respect, the project would not induce growth with respect to the White Wolf development. The Draft EIS/EIR appropriately identifies the White Wolf development as another project that is reasonably foreseeable, because the County has received an application for that development. The White Wolf development is therefore included in the discussion of cumulative impacts. In this fashion, the Draft EIS/EIR discloses the impacts that would occur if both the project and the White Wolf Development are approved. For additional information, please see response to comment 0166-6.

0166-43, Other NEPA/CEQA Analysis (ONCA)

As discussed in responses to comments 0166-40 through 0166-42, the Draft EIS/EIR adequately evaluates the project’s growth-inducing impacts and the project would not result in a significant growth-inducing impact.

0166-44, Alternatives (A)

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The comment provides an overview of the requirement to address alternatives in an EIS/EIR. The comment does not address the project. The comment is noted.

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project, even if these alternatives would impede to some degree the attainment of the project objectives or would be costlier. CEQA Guidelines § 15126.6(b).

Similarly, the evaluation of alternatives is the “heart” of an EIS. 40 CFR § 1502.14 (2004). It “guarantee[s] that agency decisionmakers have before them and take into proper account all possible approaches to a particular project . . . which would alter the environmental impact and the cost-benefit balance . . .” *Bob Marshall Alliance v. Hodel*, 852 F.2d 1223, 1228 (9th Cir. 1988) (internal citations and quotations omitted). NEPA’s regulations and Ninth Circuit case law also require an agency to “[r]igorously explore and objectively evaluate all reasonable alternatives.” § 1502.14(a) (emphasis added); *Citizens for a Better Henderson v. Hodel*, 768 F.2d 1051, 1057 (9th Cir. 1985) (EIS must consider “every” reasonable alternative).

The federal courts, in the Ninth Circuit as elsewhere, have consistently held that a federal agency’s failure to consider a reasonable alternative is fatal to a NEPA analysis. *See, e.g., Idaho Conservation League v. Mumma*, 956 F.2d 1508, 1519-20 (9th Cir. 1992) (“The existence of a viable, but unexamined alternative renders an environmental impact statement inadequate.”); *Forty Most Asked Questions Concerning CEQ’s NEPA Regulations*, 48 Fed. Reg. 18,026 (March 16, 1981) (“In determining the scope of alternatives to be considered, the emphasis is on what is ‘reasonable’ rather than on whether the proponent or applicant likes or is itself capable of carrying out the particular alternative. Reasonable alternatives include those that are practical or feasible from a technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”). “In order to be adequate, an environmental impact statement must consider not every possible alternative, but every reasonable alternative.” *Friends of Endangered Species v. Jantzen*, 760 F.2d 976, 988 (9th Cir.1985); *California v. Block*, 690 F.2d 753, 766-67 (9th Cir.1982); *Save Lake Washington*, 641 F.2d at 1334 (9th Cir.1981).

1. The DEIR/S Fails to Consider a Reasonable Range of Alternatives.

The DEIR/S is defective because it fails to consider a reasonable range of alternatives, including any alternative other than a gondola to provide access between the two resorts. CEQA requires that every EIR analyze a reasonable range of potentially feasible alternatives to a proposed project. *See* Pub. Res. Code § 21100(b)(4); CEQA Guidelines § 15126.6(a); *Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866 (EIR for outdoor composting facility legally deficient for failure to consider alternative that would significantly reduce air quality impacts). NEPA requires that an EIS do the same. *See* 40 CFR § 1502.14; *National Parks & Conservation Ass’n v. Bureau of Land Management* (9th Cir. 2010) 606 F.3d 1058, 1072 (BLM’s EIS for land swap overturned for failure to analyze a “reasonable range of alternatives.”).

To be reasonable, the range of alternatives analyzed in an EIR must provide enough variation from the proposed project “to allow informed decision making” regarding options that would reduce environmental impacts. *Laurel Heights I*, 47 Cal.3d at 404-05. Here, the three

0166-44 cont'd, Alternatives (A)

0166-45, Alternatives (A)

The comment states that the EIS/EIR’s analysis of alternatives is deficient because it does not consider an action alternative involving a connection between Squaw Valley and Alpine Meadows that does not include a gondola.

In September 2015 and October 2015, the Tahoe National Forest (TNF) and County, respectively, accepted applications from Squaw Valley Ski Holdings, LLC (SVSH), the project applicant, to install, operate, and maintain an aerial ropeway system (gondola) connecting the Squaw Valley and Alpine Meadows ski areas. The Forest Service must respond to SVSH’s land use application, which proposes additional lift infrastructure be approved to improve connectivity between Alpine Meadows and Squaw Valley. Placer County’s responsibility under CEQA is predicated upon the review of an application for a conditional use permit and Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) amendment. Thus, this applicant-proposed NEPA/CEQA analysis process is driven by the Proposed Action put forth by SVSH, as described in Section 2.2.2 of the Draft EIS/EIR. In response to issues identified internally by the Forest Service and Placer County, and externally by the public during the scoping process, a reasonable range of alternatives was developed to meet the project objectives. The EIS/EIR analyzes in detail the No Action Alternative and three action alternatives. Differences between the action alternatives (Key Issues) are discussed in Section 2.4.1 of the EIS/EIR. Additionally, four alternatives were considered but eliminated from detailed analysis, including improvements to the existing shuttle system, alternative route alignments, a buffer zone around the National Forest System-Granite Chief Wilderness, and alternative technologies. These alternatives were ultimately eliminated from detailed analysis because they failed to meet the Forest Service purpose and need and/or the CEQA project objectives. Section 2.3 of the Final EIS/EIR provides additional information on these alternatives considered but not evaluated further, and explains why they were eliminated from detailed analysis. In addition, Master Response 1.8.2 addresses the “Improvements to Existing Shuttle System Alternative,” which involves expanding the existing shuttle system between the resorts.

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action alternatives differ only by the gondola's alignment. All three alternatives include roughly the same number of towers (between 33 and 35), 2 base terminals and 2 mid-stations, and 8 Gazex Exploders. *See* DEIR/S Table 2-1. The alternatives would also all disturb roughly the same amount of land. *See* DEIR/S Table 2-2.

Due to the lack of clear distinctions among alternatives, as the DEIR/S explains, there is very little difference in environmental effects among them. *Id.* at 5-13. For example, all of the alternatives would have significant and unavoidable impacts on visual resources, traffic, and noise. DEIR/S at Table 2-3. Alternatives that do not reduce the Project's significant and unavoidable impacts do not contribute to the "reasonable range" of alternatives required by CEQA. *See* Pub. Res. Code § 21100(b)(4); CEQA Guidelines § 15126.6(a) & (b). As the primary purpose of alternatives analysis under CEQA and NEPA is to explore options to proposed actions that will adversely affect the environment, assessing slightly different variations of proposals with essentially identical environmental effects does not constitute an adequate alternatives analysis.

Notably, the DEIR/S fails to seriously evaluate non-gondola alternatives. In its scoping comments, Sierra Watch encouraged the County and the Forest Service to consider evaluate alternatives that could achieve Project objectives without the negative environmental impacts attendant to a gondola.

0166-46

2. The DEIR/S Fails to Properly Evaluate an Alternative that Would Improve the Existing Shuttle System.

In the section entitled "alternatives considered but not further evaluated, the DEIR/S identifies an alternative entitled "Improvements to existing shuttle system." DEIR/S at 2-30. Under this alternative, the fleet of shuttle vehicles would be expanded (types, sizes, fuel sources, user amenities) and the timing, location, and scheduling of the route would potentially be changed and shortened. DEIR/S at 2-30. Yet, rather than flesh out this alternative and evaluate its merits as compared with the proposed Project, the DEIR/S rejects it for further consideration, suggesting it does not adequately meet the Project's purpose and need. DEIR/S at 2-30. But this justification fails. An EIR may not discard an alternative based on overly narrow project objectives. *North Coast Rivers Alliance v. Kawamura* (2016) 243 Cal.App.4th 647, 668-69 (agency may not employ artificially narrow project objectives to constrain alternatives analysis); *Env'tl. Prot. Info. Ctr. v. United States Forest Serv.* (9th Cir. 2007) 234 F.App'x 440, 443 (noting that the agency "may not define the goals of its projects so narrowly that only its preferred alternative will meet those goals").

Here, the DEIR/S essentially asserts that the only way to improve access between the two resorts is by building a gondola. *See, e.g.,* DEIR/S at ES-2, 3 ("Provide a system where the gondola segment between the Squaw Valley base terminal and mid-station can operate independently from the remainder of the gondola so that this segment can potentially function as

0166-45 cont'd, Alternatives (A)

0166-46, Alternatives (A)

Please see Master Response above on the Improvements to Existing Shuttle System Alternative provided in Section 1.8, "Master Responses."

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a ski lift if the remainder of the gondola is not operational because of weather, maintenance, or other factors;" "Use a facility alignment that allows vehicles and equipment to reach gondola cabins from the ground to evacuate people from the cabins, if necessary, during an emergency situation;" and "Provide opportunities for skiers to offload at mid-stations to provide easier access to existing skiable terrain.") This approach is tantamount to saying that the objective of the Project is to implement the Project. Narrowing the Project's goals in this way tilts the analysis of alternatives unavoidably—and illegitimately—toward the proposed gondola.

In rejecting the "improvements to existing shuttle system" alternative, the DEIR/S states that just 2.7 percent of total downhill snow-sport visits currently use the existing shuttle and that this low shuttle usage is an indicator that guests do not find a shuttle system convenient and/or effective. DEIR/S at 2-30. The DEIR/S, however, fails to provide any description of the existing shuttle service. If the existing shuttle system operates at, or over, capacity or if riders are forced to endure lengthy wait times, this would certainly cause low ridership. In fact, elsewhere in the DEIR/S, the document explains that the current visitor experience requires that visitors wait 30 minutes for a shuttle. Executive Summary at 1. The fact that visitors may find the current shuttle system inadequate does not mean that an enhanced system would also be ineffective.

Had the DEIR/S considered an alternative that enhances the shuttle system rather than merely continuing the current deficient service, it could have determined that a state-of-the-art shuttle system would dramatically increase ridership. As the DEIR/S asserts, the fleet of vehicles and user amenities could be expanded (and frequent and reliable service is the most basic of these amenities) and the route could potentially be changed and shortened. DEIR/S at 2-30. In addition, an enhanced transit system alternative could explore an operational scenario in which Squaw Valley operates one of the three reversible lanes on Squaw Valley Road, as a transit-only lane. Given the volume of vehicular traffic traveling on Squaw Valley Road, an exclusive transit lane could be operational only during non-peak hours. Nonetheless, it could greatly improve shuttle transit times between the two resorts since the majority of those needing access to the other resort likely occurs during non-peak hours. It cannot be disputed that a well-designed enhanced transit alternative would, in addition to facilitating improved access between the two resorts, encourage increased transit use throughout Olympic Valley. Increasing transit ridership would reduce motor vehicular trips, minimize Squaw Valley's parking shortages, while also reducing air pollution and greenhouse gas emissions.

3. The County May Not Approve the Project Because a Feasible Alternative Exists That Would Meet the Project's Objectives and Would Diminish its Significant Environmental Impacts.

Under CEQA, an agency may not approve a proposed project if a feasible alternative exists that would meet a project's objectives and would diminish or avoid its significant environmental impacts. Pub. Res. Code § 21002; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 731; *see also* CEQA Guidelines §§ 15002(a)(3), 15021(a)(2),

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0166-46 cont'd, Alternatives (A)

0166-47, Alternatives (A)

The action alternatives differ considerably in magnitude of anticipated environmental impact. The comment quotes part of a sentence on page 5-13 of the Draft EIS/EIR (within Section 5.2.4), where it is stated that there is little difference in effects among the action alternatives. This quotation consists of summary text, and does not reflect fully the Draft EIS/EIR's analysis. The full sentence quoted by the comment reads: "As shown in Table 2-3, *based solely on impact significance conclusions*, there is little difference in effects among the action alternatives" (emphasis added). The impact significance conclusions themselves are limited in their ability to fully characterize the exact nature of an environmental impact because there are considerable nuances associated with impacts under each alternative that must be described in much greater detail. For this reason, a considerable amount of narrative text was provided within the EIS/EIR to distinguish the magnitude of anticipated environmental impacts in a way that the impact significance conclusions on their own could not have accomplished.

In short, an adequate range of alternatives with varying degrees of environmental impact was considered and analyzed for this project. For example, Alternative 4 is a feasible action alternative that would meet the project's identified NEPA purpose and need and CEQA project objectives and would at the same time diminish or avoid significant environmental impacts. Please refer to Section 2.4.1 of the Final EIS/EIR, which notes differences between the action alternatives for the project's key issues. Please also refer to the Master Response discussing Improvements to Existing Shuttle System Alternative, provided in Section 1.8, "Master Responses," which describes why this potential alternative was eliminated from detailed analysis in the EIS/EIR.

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15126(d); *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 443-45. An alternative need not meet every Project objective or be the least costly in order to be feasible. *See* CEQA Guidelines § 15126.6(b).

The DEIR/S identifies Alternative 4 as the environmentally superior alternative. DEIR/S at 5-15. Moreover, as the DEIR/S acknowledges, because all three action alternatives call for the development of a gondola between the two ski resorts, there is little difference in environmental effects among the alternatives. *Id.* at 5-13. Consequently, Alternative 4, like the proposed Project (Alternative 2), would accomplish all of the Project Objectives. *Id.* at ES-2, 3. Consequently, approval of the Project would violate CEQA.

0166-48

II. Approval of the Project Would Violate Section 4(f) of the Department of Transportation Act.

In enacting section 4(f) of the Department of Transportation Act, Congress declared that "special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands [and] wildlife and waterfowl refuges" 49 U.S.C. § 303. To realize these broad goals, the Act sets forth two fundamental substantive mandates: (1) prohibiting federal agencies from approving transportation projects that require use of a public park, recreation area or wildlife refuge unless there are no feasible and prudent alternatives to using the parkland; and (2) requiring transportation projects which use a public park, recreation area or wildlife refuge to include all possible planning to minimize harm to the parkland. 49 U.S.C. § 303(c).

As the Supreme Court has explained, the "very existence" of section 4(f) demonstrates "that protection of parkland was to be given paramount importance." *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 412-413. By holding that only alternatives that included additive costs or community disruption of "extraordinary magnitude" could justify an exemption to section 4(f), the Court clarified that choosing a siting alternative that requires use of a public park or recreation area simply because it is the least expensive or most efficient choice does not meet the rigorous mandate of the provision. *Overton Park* thus sharply limited the discretion of federal agencies in approving proposed transportation projects affecting 4(f) resources.⁷

Under the Transportation Act, a transportation project need not be physically located on or within public parkland to qualify as "using" that land. Rather, 4(f) will apply if the project's adverse impacts on the parkland amount to "constructive use." As federal regulations explain, "constructive use" occurs when:

[A] transportation project does not incorporate land from a section 4(f) resource, but the project's proximity impacts are so severe that the protected activities,

⁷The standards outlined in the *Overton Park* case have been codified by the Department of Transportation's section 4(f) implementing regulations at 23 CFR § 771.135.

0166-47 cont'd, Alternatives (A)

0166-48, Other (O2)

The provisions contained in Section 4(f) of the Department of Transportation Act are not applicable for this project. According to the Federal Highway Administration, the authority ultimately responsible for making all decisions related to Section 4(f) (including the applicability of 4(f) to a specific property), Section 4(f) applies only to projects that receive funding from or require approval by an agency of the U.S. Department of Transportation.

This project would not receive federal funding from an agency of the U.S. Department of Transportation, nor would the project require approval from an agency of the U.S. Department of Transportation. The relevant governmental agencies for this project are Placer County and the Tahoe National Forest (Truckee Ranger District), neither of which are subsidiaries of the U.S. Department of Transportation. As such, the provisions contained in Section 4(f) of the Department of Transportation Act do not apply to this project.

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0166-48 cont'd, Other (O2)

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features, or attributes that qualify a resource for protection under section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features, or attributes of the resource are substantially diminished.

23 CFR §771.135(p)(2). Examples of constructive uses include noise increases, substantial aesthetic impairment, restriction of access, vibration impacts, and ecological intrusions, among others. *See* 23 CFR § 771.135(p)(4).

The courts have applied section 4(f) to constructive uses in a wide variety of circumstances. For example, in *Brooks v. Volpe*, 460 F.2d 1193, 1194 (9th Cir. 1972), the Ninth Circuit found that a highway adjacent to a campground was subject to section 4(f) despite the fact that there was no actual use of protected lands. Other courts have found constructive use of section 4(f) lands resulting from such impairments as increased noise, unsightliness, and impaired access. *See, e.g., Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 202 (D.C. Cir. 1991) (holding noise from airport expansion would impact nearby park); *Citizen Advocates for Responsible Expansion, Inc. v. Dole*, 770 F.2d 423, 439 (5th Cir. 1985) (holding highway project would cause aesthetic and visual intrusion on protected park and historic buildings); *Monroe County Conservation Council v. Adams*, 566 F.2d 419, 424 (2d Cir. 1977) (holding highway would restrict access to park because nearby residents would have to cross four lanes of heavy traffic).

Here, all of the gondola alternatives discussed in the DEIR/S would severely impact 4(f) resources at Granite Chief Wilderness, Squaw Saddle, and the Five Lakes Trail. DEIR/S at 4.3-11—4.3-12; 4.3-14—4.3-15; 4.3-16—4.3-17. *See*, <https://protectgranitechief.wordpress.com/2018/06/07/new-study-indicates-all-squaw-alpine-gondola-alternatives-impact-granite-chief-wilderness-visitors/>, attached as Exhibit L. In particular, the construction of gondola infrastructure, under any of the alignments, would be plainly visible from locations within the Granite Chief Wilderness, Squaw Saddle, and the Trail; these impacts include visibility of helicopters, machinery, and work crews. DEIR/S at 4.3-12. Operation of the gondola may also create visual impacts for users of the Granite Chief Wilderness and the Trail during the summer as cabins (summer-only moving of cabins for system maintenance), towers, and wire-rope would be visible from Views 14 and 16, Five Lakes Trail, Granite Chief Wilderness, and Squaw Saddle. *Id.* Equally concerning, noise from construction activities (e.g., off-road equipment and helicopters), operational noise from the Gazex exploders and the gondola itself, and vibration from the blasting required to remove rock outcroppings would interfere with the use of Granite Chief Wilderness, Squaw Saddle, and the Trail. *See* DEIR/S Noise Chapter. All of these impacts would significantly reduce the opportunities for primitive and unconfined recreation for users in these recreational areas. *Id.*

In light of these effects, the Forest Service must consider a feasible and prudent alternative to the gondola—one that does not constructively use Granite Chief Wilderness, Squaw Saddle, and the Five Lakes Trail. The Act also requires that the Service include all

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possible planning to minimize harm to this land. Because the EIR/S lacks an adequate range of alternatives, but instead promotes only the gondola, any approval of the Project would contravene the Transportation Act.

Respectfully submitted,

SHUTE, MIHALY & WEINBERGER LLP



Amy J. Bricker



Laurel L. Impett, AICP
Urban Planner

SHUTE, MIHALY
& WEINBERGER LLP

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Exhibits

Exhibit A	Biological Resources Letter Report, Michael White, Ph.D. June 6, 2018.
Exhibit B	Sierra Watch Comment Letter to Placer County dated December 5, 2017 re: Segmentation with attachments.
Exhibit C	Visual Acuity Testing, From the Laboratory to the Clinic; Bailey and Kitchin, 2013.
Exhibit D	Google Earth Map of Munchkins Ridge.
Exhibit E	Squaw Valley Alpenglow Guided Backcountry Tour webpage.
Exhibit F	VSVSP EIR Transportation Chapter, excerpts.
Exhibit G	VSVSP EIR Squaw Valley Fire Department Comments on Draft Environmental Impact Report (Comment LL1), excerpt.
Exhibit H	VSVSP EIR Air Quality Chapter, excerpts.
Exhibit I	Tahoe Regional Planning Agency, Comments on EIR for the Village at Squaw Valley Specific Plan, December 22, 2015.
Exhibit J	Final Tahoe Total Maximum Daily Load Report. November 2010.
Exhibit K	<i>"Fugitive Dust Emissions from Paved Road Travel in the Lake Tahoe Basin,"</i> October, 2009.
Exhibit L	"Protect Granite Chief" website.

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EXHIBIT A

0167

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0167-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

Ms. Laurel L. Impett
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421

June 6, 2018

RE: Squaw Valley-Alpine Meadows Base-to-Base Gondola Project

Dear Laurel:

0167-1

I am a professional ecologist with 30 years of experience with environmental impact analyses, conservation planning, habitat restoration, and conservation land management. I have reviewed the documents for the referenced project and submit these comments specifically on environmental analyses for the vegetation, botany, wildlife and aquatics, and wetlands issue areas. Major issues include:

- The EIR/EIS does not provide an adequate description of the project, including the specifics on construction techniques, chemicals that may be released into the environment, and levels of noise, vehicle use, and human activity that will be required to build the specific alternatives. The EIR/EIS defers an assessment of these impacts to a future consultation with resource and permitting agencies. This document does not provide adequate detail to assess the true nature of the environmental impacts of the individual alternatives.
- The project is inconsistent with conservation and resource management objectives of federal, state and local agencies. There are many regulations and policies, discussed in more detail below, that require avoidance and minimization of impacts when feasible. The proposed project does not avoid or minimize impacts to sensitive resources to the degree practicable, and the least damaging alternative is not proposed.
- Proposed Resource Protection Measures (RPMs) and Mitigation Measures do not mitigate significant project impacts to a level less than significant. The proposed RPMs and Mitigation Measures involve training, planning, consultations, and undefined, future compensatory mitigation measures. The proposed RPMs and Mitigation Measures do not eliminate or adequately compensate for the significant impacts that would occur as a result of the project. In particular, the significant impacts to the Federal Endangered and California Threatened Sierra Nevada Yellow-legged Frog (SNYLF) and its designated Critical Habitat are not avoided, minimized or adequately mitigated.

I offer additional detailed comments on specific sections below.

Sincerely,



Michael D. White, PhD

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Squaw Valley-Alpine Base-to-Base Gondola Project
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Section 1.3 Purpose and Need and Project Objectives

0167-2 | The EIS purpose is to improve developed winter recreation opportunities in the Scott Management Area, consistent with Tahoe National Forest (TNF) Land and Resource Management Plan (LRMP); however, the project is not consistent with LRMP objectives. The EIR/EIS correctly states that Alpine Meadows Special Use Permit applies to the Scott Management Area of the TNF LRMP, but it does not acknowledge that a significant portion of Alternative 2 would affect the Granite Chief Management Area. The Granite Chief Management Area abuts the Scott Management Unit at the boundary of the Granite Chief Wilderness. The document describes the area of private land at the eastern edge of the Granite Chief Wilderness, but within the Wilderness Boundary, that will be traversed by the proposed project, but states that Wilderness Area protection does not apply to these lands and the lands serve no regulatorily defined buffer functions. However, the EIR/EIS does not acknowledge that the Resource Management Emphasis for the Granite Chief Management Area includes managing the privately owned area as Wilderness and acquiring private inholdings within the designated Wilderness boundary. The proposed project is inconsistent with the resource protection and management directives for the Granite Chief Management Area, and, in fact, creates additional threats and concerns that are at odds with the management emphasis of this unit.

0167-3 | Project alternatives include features that cause significant impacts but are not required by the EIS project Purpose and Need. All action alternatives include development of an avalanche mitigation system, primarily on public land. However, the need for an avalanche mitigation system is not part of the project's NEPA/EIS Purpose and Need. Furthermore, while an avalanche mitigation system is included in the project's CEQA/EIR Purpose and Need, based on the rationale provided in the EIR/EIS for the avalanche mitigation system it would be required only as a means of avoiding damage to new infrastructure associated with Alternative 2. Therefore, development of an avalanche mitigation system on public lands is not necessary to protect infrastructure associated with Alternatives 3 and 4. If the need for the avalanche mitigation system is independent of the gondola alignment, then this should be discussed and presented as part of the EIS Purpose and Need.

Section 2 Description of Alternatives

0167-4 | The EIR/EIS provides an incomplete and inadequate description of construction required for the proposed project. Construction of a "temporary" access road, tower sites, mitigation avalanche system, and associated infrastructure in this rugged and sensitive terrain would be the largest impacts of the project, but little information is presented to assess their complete effects in the EIR/EIS, and the document defers detailed siting and analyses to future consultations and approvals. The document also draws a distinction between permanent and temporary impacts that cannot legitimately be made without more detail.

For example, portions of the project area are so steep that project biologists were not able to access them by foot or were required to rappel to reach them, but the EIR/EIS states that the project will be designed so that "minimal excavation and material export" will be required. What is minimal? How will vehicles and equipment actually be moved to the site and what types of terrain modifications will be required? Section 4.15 (Wetlands) states "...wetlands and other waters would be temporarily disturbed during construction activities but would be restored to original contour and revegetated after construction..."

0167-2, Purpose and Need (P&N)

The resource management emphasis for the Granite Chief Management Area is beyond the scope of this analysis because the private lands within the congressionally mapped GCW are not publicly owned and therefore are not managed in accordance with the Forest Plan. As stated in a footnote on pages 1-13 and 4.1-4 of the Draft EIS/EIR, "A portion of Alternative 2 is located on private lands that are within the Granite Chief Management Area where Forest Service management does not apply to the private lands."

However, Section 4.3, "Wilderness" still includes discussion of the potential wilderness characteristics of those private lands within the congressionally mapped GCW, as well as the potential future acquisition of those private lands by the United States government.

0167-3, Purpose and Need (P&N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0167-4, Project Description (PD)

Table 2-2 of the EIS/EIR presents a comparison of disturbance of alternatives. Construction practices for each action alternative are discussed in Section 2.2 of the EIS/EIR. For example, Exhibit 2-2 provides an overview of the alignment for Alternative 2. The exhibit also shows the approximate location of the construction access road. Exhibits 2-4, 2-5 and 2-6 show close-ups of base terminals and mid-stations; these exhibits also show the approximate location of the construction access road. The text describes the construction access route as follows as it relates to the Alpine Meadows mid-station: "Additionally, construction equipment (including a tracked excavator and spider excavator¹) and materials (lift equipment, generator, and tools) would be transported to the site via a temporary construction access route primarily on private lands (approximate route is depicted in Exhibit 2-2). This route would be approximately 15 feet wide and would be utilized during

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construction in snow-free conditions, and potentially by over-the-snow machinery if snow remains in some areas when construction begins. Construction will only occur when soil conditions are such that there will not be excessive disturbance from machinery, grading, or construction activities that would lead to erosion. All-terrain vehicles would also use the identified route to access the site (primarily for construction crew transport) once the area is clear of snow. Further details regarding this access route, including the alignment and permitted machinery, will be developed prior to implementation as part of a Route Plan developed by the project applicant and provided to the Forest Service and Placer County for review and approval. All temporary access routes will be approved by both the Forest Service and Placer County prior to construction, in accordance with RPM MUL-3. Winter maintenance and emergency access would be provided to this facility over-the-snow using snowmobiles and snowcats along the same temporary construction access route identified in Exhibit 2-2. There would be no long-term summer maintenance route to this facility; a permanent access road to the mid-station is not proposed. The temporary construction access route would be restored to its previous condition after construction is complete." (Draft EIS/EIR, page 2-11).

Similar information is provided with respect to the temporary access route to the Squaw Valley mid-station (see Draft EIS/EIR, page 2-12). As the Draft EIS/EIR notes, construction access would be provided by an existing road, so no new disturbance would occur with respect to construction access. The Draft EIS/EIR also identifies the temporary access that would be provided during construction of towers, depending on the area in which the towers are located (Draft EIS/EIR, page 2-12). "Overall, the base terminals and mid-stations would disturb approximately 5 acres. Tower footings would disturb a maximum of 0.5 acre (35 towers x 600 square feet maximum disturbance each, including temporary disturbance, access and staging). In total, gondola construction would disturb up to approximately 5.5 acres." (Draft EIS/EIR, p. 2-13.)

The Draft EIS/EIR also describes temporary construction access required under Alternative 3. Exhibits 2-9, 2-11 and 2-12 show the location of the temporary construction access road for Alternative (see Draft EIS/EIR, p. 2-17).

The same information is provided for Alternative 4 (See Exhibits 2-13, 2-15, 2-16, 2-17). Under Alternative 4, access to the Alpine Meadows mid-station "would require

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construction of a segment of new permanent road on the Caldwell property" (Draft EIS/EIR, p. 2-27).

Table 2-2 summarizes the amount of disturbance that would occur under each alternative. This table includes information regarding the amount of disturbance associated with temporary construction access. This table also estimates the amount of disturbance that would occur under each alternative, both permanently and during construction, associated with construction of the mid-stations and towers. The estimates are necessarily preliminary because temporary construction access roads have not been designed. Nevertheless, sufficient information exists to evaluate whether the temporary construction access roads would result in significant impacts.

The Draft EIS/EIR acknowledges that the exact placement of each tower has not been determined for the proposed project or for Alternatives 3 and 4. Table 2-1 provides, however, a summary of the design characteristics of each alternative, including the number of towers (See Draft EIS/EIR, pp. 2-27-2.28). Exact placement of towers requires engineering the alignment approved by the County and Forest Service. At this time, it is not known whether the County and Forest Service will approve the proposed project, approve an alternative alignment, or disapprove the project (in effect, approving "no project". Preparing project plans at an engineering level of detail is both costly and time consuming. Such expense would be wasted in the event the County and Forest Service do not approve the project as proposed. Even if the County and the Forest Service do approve the proposed project, or an alternative, final engineering plans would be prepared for three alignments, even though at most only one alignment would be approved. Requiring an engineering level of detail at this point in time would therefore be a needlessly wasteful exercise.

In addition, final engineered plans are not needed in order to identify the impacts associated with the project. Rather, sufficient information must be provided to assess the project's impacts. Such information typically consists of conceptual or preliminary plans, with engineering details to follow if and when the agency approves the project. In this case, the applicant has provided sufficient information to enable the County and Forest Service to quantify the impacts related to construction. In particular, the EIS/EIR discloses the number and general location of towers under each alternative, the approximate location of construction access roads, the areas that will be disturbed during construction of the mid-

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stations. The information is provided for all three action alternatives. The EIS/EIR also acknowledges that during project design the locations and areas of disturbance may shift either to meet engineering specifications, or to avoid sensitive resources if it is feasible to do so.

The comment notes that some areas are so steep that they were inaccessible to biologists, and states that these areas are particularly sensitive to disturbance during construction. The temporary access roads would not be located on such areas.

Construction activities would be timed to avoid periods during which wet soil conditions could result in erosion; in particular, RPM SOILS-5 requires that "Soil-disturbing activities will be avoided during periods of heavy rain or excessively wet soils consistent with criteria developed by the Lahontan Regional Water Quality Control Board (LRWQCB)."

Additionally, construction and implementation of the action alternatives would occur in accordance with Resource Protection Measures included in the EIS/EIR as Appendix B. Potential construction-related impacts to wetlands are discussed in Section 4.15.3 of the EIS/EIR. Furthermore, it is noted that many of the final details of actual on-the-ground construction requirements are not yet known but will be overseen in detail and permitted as appropriate by the TNF and Placer County in accordance with the Resource Protection Measures (Appendix B) which have been developed specifically for this project.

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Squaw Valley-Alpine Base-to-Base Gondola Project
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0167-4
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suggesting that some terrain modifications would occur. The EIR/EIS also states that the gondola towers "could" be anchored to rock but "some" blasting "could" be required, and that "Construction will only occur when soil conditions are such that there will not be excessive disturbance from machinery, grading, or construction activities that would lead to erosion." What are these conditions? How often do they occur and how will they be measured and monitored? The EIR/EIS states that blasted material will be scattered around the site. Over what area? What is the nature of the material (e.g., quantity of fine grained materials that could be washed into sensitive aquatic habitats)? Are there associated chemicals that could be discharged into sensitive habitats? How will it be scattered, by hand or with machinery? What noise levels would be generated by the project and for how long? The document states that in building the Gazex avalanche mitigation system "No temporary or permanent access roads would be required. Materials would be flown in by helicopter." How will construction crews access the Gazex system sites and how frequently and for how long will access be required? Can the avalanche mitigation system be constructed if the "temporary" access road associated with Alternative 2 is not built (i.e., in Alternatives 3 and 4)? As project construction is not adequately described and quantified, the environmental impact analyses in the EIR/EIS do not and cannot accurately estimate impacts. A complete analysis of environmental impacts necessitates knowing how much and where terrain modification will be required (e.g., grading and blasting), the disposition and characteristics of spoils, levels of noise generated over what areas and other construction details.

0167-5

Likewise, the Project Description does not provide an accurate description of the location of the project relative to local topography and drainage. The Alternative 2 gondola alignment is proposed along the local watershed boundaries between the Five Lakes and Barstool Lakes and the Bear Creek drainage. While not discussed in the Project Description section, the Wildlife and Aquatics section (4.14) states that drainage from disturbed areas will be to the east away from Five Lakes and Barstool Lake, but the EIR/EIS does not provide enough information to validate this. In addition, the Gazex avalanche mitigation system appears to be located outside of the Barstool Lake basin but the project description is inadequate to verify this. Where is proposed infrastructure located, what terrain modifications required to build the project, and will these terrain modifications alter local drainage patterns? More details are needed to adequately assess the environmental impacts of the project.

0167-6

Skidding trees may not require new roads but could impact sensitive resources. The document needs more description, mapping, and quantification of these impacts.

0167-7

The EIR/EIS does not adequately describe long-term maintenance of the proposed project. Presumably this will happen during non-winter seasons when the potential for impacts to sensitive resources is greatest. What type and frequency of maintenance is required? What types of equipment will be used for maintenance? Will lubricants, paints, solvents or other chemicals be used? Where are they stored and how and with what frequency are they moved to the site? Section 4.12 (Vegetation) states that vegetation management under the gondolas would continue in the future. How will the area be accessed, by what equipment and how frequently?

Section 4.12 Vegetation

0167-8

The significance of impacts should be assessed based on the intensity of the effects within the context that they occur. The Vegetation Section of the document reports acreages and species composition of vegetation communities but does not provide an accurate description of the condition of the resources in

0167-4 cont'd, Project Description (PD)

0167-5, Hydrology and Water Quality (H&WQ)

It is acknowledged that based on the scale of Exhibit 4.17-1 (pg. 4.17-4) it is difficult to confirm from Exhibit 4.17-1 (pg. 4.17.4) that the Alternative 2 alignment is entirely outside the Five Lakes Creek Watershed. However, Exhibit 4.16-1, "Topography of the Project Area" (pg. 4.16-2) is of sufficient scale to confirm, looking at the topographic markings, that the alignment of Alternative 2 is downslope to the east of the Five Lakes Creek Watershed. In addition, in assessing the Proposed Action, project hydrologists and aquatic biologists did review project data through GIS analysis allowing greater detail to be evaluated.

Potential ground disturbances at the Alpine mid-station under Alternative 2 would be situated such that disturbance area runoff would flow down gradient to the east and away from the Five Lakes basin. The types of disturbance required to implement elements of each action alternative are described in Section 2.2 of the EIS/EIR. Table 2-2 presents a comparison of disturbance quantified under each alternative. None of the disturbances associated with any of the action alternatives would be sufficient to constitute terrain modifications which would alter local drainage patterns.

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0167-6, Project Description (PD)

Skidding of trees would occur in accordance with Resource Protection Measures presented in Appendix B of the EIS/EIR. Specifically, 12 RPMs specific to tree removal are included on page B-32. For example, RPM Tree-1 states that skidding trees is prohibited in wetlands or other waters. Where tree skidding may occur in proximity to wetlands, tree removal must use cable systems, helicopter yarding, or ground-based equipment to prevent any disturbance to wetlands. Aquatic

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habitat must be "fully protected from disturbance and sedimentation." (Draft EIS/EIR, page B-32).

0167-7, Project Description (PD)

Operation and maintenance of the proposed project would occur in accordance with Resource Protection Measures (RPMs) presented in Appendix B of the EIS/EIR. RPMs have been incorporated into all action alternatives and include requirements for the applicant to adhere to spill prevention practices, prepare construction and operation plans for Forest Service and Placer County review, prepare an erosion and sediment control plan, etc.

The comment states that maintenance activities would presumably occur during the non-winter season, when impacts would presumably be greater. This comment is incorrect. Maintenance would also occur during the ski season, using snowmobiles and snowcats. (Draft EIS/EIR, page 2-11).

The manufacturers of the gondola require that infrastructure be maintained to certain standards, in accordance with the relevant maintenance manual. Gondola maintenance can generally be categorized into cabin and grip maintenance, terminal maintenance, and sheave assembly maintenance. Cabin and grip maintenance would occur at the base terminals and operating buildings (indoors); terminal maintenance would occur on-site at each base terminal location; and sheave assembly maintenance would occur on-site at each tower location. Each terminal would have road access for maintenance, and a special maintenance carrier on the gondola line would be used for access to each tower location for sheave assembly maintenance. All materials required for proper maintenance practices would be used in accordance with the manufacturer's specifications; this includes lubricants, oils and other materials that may be needed for maintenance and have been approved by relevant federal, state and local agencies.

Vegetation management under the gondola would entail trimming back limbs and trees that would otherwise encroach into the gondola airspace corridor; this process would be carried out with hand tools and chainsaws and access would occur via truck, four-wheeler or on foot (depending on the specific location).

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0167-8, Vegetation (V)

Section 4.12 "Vegetation" of the Draft EIS/EIR includes an Environmental Setting subsection 4.12.1.1 which describes existing ground disturbances consisting of ski resort infrastructure, including buildings, roads, ski trails, and hiking trails, and native habitats throughout the study area.

The comment states that the Draft EIS/EIR does not provide an accurate description of the condition of the resources in the project area. The Environmental Setting section of Section 4.12, "Vegetation" provides sufficient information to adequately assess environmental effects and addresses varying quality and importance of habitat through the consideration of "Sensitive Natural Communities" and "Riparian Habitats." Table 4.12-1 identifies the types of habitat located within the study area for each alternative, and lists typical plant species located within that habitat. The table also identifies the amount of that habitat type/vegetation located within the study area for each alternative. The text provides further information on the characteristics of each habitat type. Those habitats that are considered particularly sensitive are identified. The EIR also identifies trees located in the area, and provides information on the health of these trees. (Draft EIS/EIR, pp. 4.12-8 through 4.12-13.) The comment does not state that this information is inaccurate. Rather, the comment states that additional information should be provided regarding the relative quality of the habitat. The EIS/EIR does, however, identify those habitats that are considered sensitive. Further differentiating the habitat types based on the relative quality of that habitat is not necessary to assess the project's impacts.

The project elements and proposed locations have been designed to minimize impacts to sensitive areas as much as possible. The sensitive natural communities in the project area mentioned in the comment (i.e., referencing Draft EIS/EIR page 4.12-27) are generally unaffected by the project. One exception is mesic and riparian shrubland (0.09 acre). Because of the low height of the overstory vegetation, removal of the vegetation to allow passage for the gondola cabins under Alternative 3 would be limited or unnecessary. The amount of acreage identified for disturbance is a conservative estimate; the actual amount that would be disturbed is expected to be less because, once the final design has been developed, the corridor of vegetation will likely be narrower than assumed in the EIS/EIR. Additionally, RPMs BIO-39 and

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BIO-40, which require replacement either on-site or through compensatory mitigation for losses of wetland and riparian habitats, ensure that impacts to mesic and riparian shrubland are substantially lessened.

See response to comment 0167-2, above, regarding the Granite Chief Management Area.

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	Squaw Valley-Alpine Base-to-Base Gondola Project Page 4
0167-8 cont'd	the project area. Project facilities should avoid high quality resources to the extent feasible, but the document does not provide adequate information to make this determination. Although no habitat quality descriptions are provided, pg. 4.12-27 states that sensitive communities in the project areas have "limited distribution and are particularly vulnerable to environmental effects." Are all sensitive habitats in the project area equally vulnerable? This section also does not analyze the project impacts for consistency with the objectives for the Granite Chief Management Area.
0167-9	Vegetation management under the gondolas would be required, but insufficient information is provided to assess potential effects of this maintenance. How will the area be accessed, by what equipment and how frequently?
0167-10	The proposed project is inconsistent with Placer County Policies on avoiding ecologically fragile areas (e.g., Placer County General Plan Policies 6.D.1, 6.D.3, 6.D.14). In addition, the greatest vegetation impacts are associated with the proposed alternative.
0167-11	The Vegetation Section provides a poor cumulative analysis, but states (pg. 4.12-35) that "Decades of growth and development, Comstock-era logging, hydrologic modification, livestock grazing, and fire suppression activities in the project area have resulted in an overall adverse cumulative condition for riparian habitat and sensitive natural communities. Considering only past and present projects, the cumulative condition is adverse." The EIR/EIS does not acknowledge that the proposed project would adversely affect the already cumulatively adverse condition of the resources of the area. Furthermore, the proposed mitigation measures are unlikely to adequately compensate for these cumulative impacts (discussed further below under Section 4.14 Wildlife and Aquatics and Section 4.15 Wetlands).
0167-12	The proposed alternative is not the least damaging. Alternative 2 has the greatest vegetation community impacts, and more trees are at risk of removal, damage or mortality under Alternative 2. In addition, it is not clear that the analysis of impacts for Alternatives 3 and 4 adequately assessed the impacts associated with construction of the proposed avalanche mitigation system.
	Section 4.13 Botany
0167-13	Surveys conducted for special status plants are not adequate. While not presented in Section 4.13, Appendix H (Biological Resources) states: "For administrative reasons, most of the 2015 and 2016 survey dates were later than the blooming time for many of the special-status plant species that have the potential to occur." There were nine survey dates in 2015 and 2016, and six remaining survey dates in 2017, one of which was directed at a single species. Therefore, appropriately time surveys for special status plants occurred on five dates in October of 2017; i.e., only one-third of all the special status plant surveys conducted for the project were in the appropriate survey window. And while some special status plants can be identified from dried fruits and seeds, some species cannot, and even though plants can be identified from dried fragments, documenting the abundance and distribution of special status plants should be done during the appropriate flowering period. Although no special status plants were documented, the document states that the project area has a "high diversity and high potential for special status plants." The project area must be surveyed during biologically appropriate time periods to accurately document the baseline conditions that would allow adequate analyses of impacts to these resources.

0167-8 cont'd, Vegetation (V)

0167-9, Vegetation (V)

The comment notes that vegetation management under the gondola [alignment] would be required, but states that insufficient information is provided to assess potential effects of this maintenance. The comment further asks how the area will be accessed, by what equipment and how frequently.

As identified in Section 4.12, "Vegetation," tree removal associated with Gondola construction would be directed towards removing trees that interfere with safe Gondola operation. Continued safe Gondola operation would focus on future vegetation management as part of project maintenance, and therefore, would be directed at the ongoing trimming and removal of trees that may grow towards the Gondola towers, cables, or the cabin path of travel. Trees could be trimmed or felled by staff travelling over existing roads, on foot, or via over the snow vehicles. As stated in Chapter 2 of the Draft EIS/EIR, temporary construction access routes would be restored to pre-project conditions after construction is complete and no long-term/summer maintenance routes will be established. Trees would be trimmed/felled while they are relatively small in size, and therefore, trees or branches would be left on the ground unless adjacent to an existing road and there was a desire to remove the material by vehicle using existing roads. The frequency of vegetation management would be based on the rate of tree growth, as vegetation management would be in response to trees causing a safety hazard. For this reason, a specific maintenance schedule cannot be provided. The effects analysis in the Draft EIS/EIR is consistent with this approach to vegetation management.

0167-10, Vegetation (V)

The commenter states that the proposed project is inconsistent with Placer County Policies on avoiding ecologically fragile areas (e.g., Placer County General Plan Policies 6.D.1, 6.D.3, 6.D.14). The policies that the commenter mentions are: Policy 6.D.1. The County shall encourage landowners and developers to preserve the integrity of existing terrain and natural

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vegetation in visually-sensitive areas such as hillsides, ridges, and along important transportation corridors. Policy 6.D.3. The County shall support the preservation of outstanding areas of natural vegetation, including, but not limited to, oak woodlands, riparian areas, and vernal pools. Policy 6.D.14. The County shall require that new development avoid ecologically-fragile areas (e.g., areas of special status, threatened, or endangered species of plants, and riparian areas). Where feasible, these areas should be protected through public or private acquisition of fee title or conservation easements to ensure protection. The comment provides no examples or specific instances where the project is inconsistent with these policies.

The project has been designed to minimize impacts consistent with these policies, both through the selection of action alternative alignments and the placement of towers and temporary construction access roads. The comment does not acknowledge RPMs and mitigation measures that reduce biological resources impacts further, which are consistent with Placer County General Plan Policies.

Furthermore, the commenter states that the greatest vegetation impacts are associated with the proposed alternative. This statement is consistent with the results provided in Section 4.12 of the Draft EIS/EIR, Alternative 2 does have the greatest acreage extent of vegetation impacts. This information is incorporated into the determination of the Environmentally Superior Alternative provided in Section 5.2.4 of the Draft EIS/EIR.

0167-11, Vegetation (V)

The comment states that the vegetation section provides a poor cumulative analysis. The comment does not provide specific examples to support this statement, or provide specific information that is relevant to the cumulative impact analysis. The comment also states that the EIR/EIS does not acknowledge that the proposed project would adversely affect the already cumulatively adverse condition of the resources of the area. This comment is incorrect, as the Draft EIS/EIR does not conclude there would be no adverse contribution to cumulative effects, but states at the end of the first, fourth, and last paragraphs on page 4.12-36 that the action alternatives would not make "a considerable contribution to a cumulative effect." Consistent with the requirements of NEPA and CEQA, a project need not make "no contribution" to an adverse

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cumulative effect, but should avoid making a substantial contribution.

Additionally, the comment states that the proposed mitigation measures are unlikely to adequately compensate for the project's cumulative impacts. The comment does not provide specific reasons specifying why the mitigation measures in Section 4.12 "Vegetation" of the Draft EIS/EIR is inadequate.

Cumulative analysis under Section 4.12 "Vegetation" were included under Subsection 4.12.4 Cumulative Effects starting on page 4.12-34 of the Draft EIS/EIR. The implementation of various RPMs identified in Appendix B of the Draft EIS/EIR would reduce significant impacts on sensitive natural communities because they would ensure that sensitive habitat is avoided to the extent feasible, and that sensitive habitats that cannot be avoided are restored following construction or compensated for in a manner that results in no net loss of these habitats. Based on the no net loss standard required by state and federal laws, as applied to the project by the RPMs, Alternatives 2, 3, and 4 would not have a considerable contribution to the overall adverse cumulative effect on sensitive habitats in the project area.

Construction of Alternatives 2, 3, and 4 would result in the removal of trees and the possible removal, damage, or mortality of trees, some of which are protected by local ordinances and state regulations. However, RPMs REV-3, TREE-10, and TREE-11 would reduce significant impacts on trees to a less-than-significant level because impacts on trees requiring County tree permits would be minimized consistent with the County ordinances, tree removal would be conducted in a manner that would preserve and protect surrounding natural resources, and qualifying removed trees would be compensated for through new plantings or payment of tree replacement mitigation fees. Because the magnitude of tree removal is expected to be low relative to the distribution and availability of forest land in the region; most tree removal would be limited to common vegetation types; many of the trees that would be removed are within, or along the edges of existing developed areas; and compensation for removed trees would be implemented; tree removal as a result of Alternatives 2, 3, and 4 is not expected to contribute to changes in the composition, abundance, or regional patterns of forest resources in the region. Therefore, Alternatives 2, 3, and 4 would not make a considerable contribution to any cumulative effect related to tree removal in the region.

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The comment does not provide specific information indicating that this analysis is incorrect.

0167-12, Vegetation (V)

The comment states that the proposed alternative is not the least damaging, that Alternative 2 has the greatest vegetation community impacts, and that more trees are at risk of removal or mortality under Alternative 2. This statement is consistent with the results provided in Section 4.12 of the Draft EIS/EIR, Alternative 2 does have the greatest acreage extent of vegetation impacts and greatest potential impact on individual trees. This information is incorporated into the determination of the Environmentally Superior Alternative provided in Section 5.2.4 of the Draft EIS/EIR.

The Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0167-13, Botany (B)

The comment states that the surveys conducted for special-status plants are not adequate because most survey dates were outside of the appropriate survey window. While it is true that surveys conducted in 2015 and 2016 were later than the blooming period for many of the special-status plant species that have potential to occur in the project area, sites where potential special-status plants were identified only to genus during the 2015 and 2016 surveys were revisited during the blooming season in 2017 to finalize the species level identifications needed to determine species status. As noted on page 4 of the Botanical Survey Report, other plants that were not identifiable to species level in the field were collected and examined under a microscope until a definitive identification could be made. Therefore, all plants encountered during the 2015 and 2016 surveys were identified to the species level, and no special-status species were found. All the botanical surveys were conducted by a botanist that is an expert in the flora of this area of the Sierra Nevada and is fully

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qualified to identify special-status species that occur in the region with a high degree of confidence even when they are not in full bloom. The comment incorrectly identifies that surveys were conducted on five dates in October 2017; surveys were conducted on July 6 and August 6, 8, 12, 15, 16, and 29, 2017. Surveys were conducted in August and October of 2015 and September and October of 2016. The comment further states that the Botanical Survey Report describes the project area as having "high diversity and high potential for special status plants" which is taken out of context since the report notes that although about 340 vascular plants and 25 mosses were observed in the study area and this is a relatively extensive plant list on a per-area basis, this is often the result for long narrow study sites with substantial elevation changes within them (Appendix H1 Botanical Survey Report 2015-2017 p. 6). As noted in the Botanical Survey Report, habitat that is potentially suitable for several special-status species is present, but no special-status species were observed on the site during surveys carried out during 2015-2017 (Appendix H1 Botanical Survey Report 2015-2017 p. 5). The information provided in the Draft EIS/EIR provides a fully adequate description of baseline botanical resources conditions and the potential for special-status plant species to occur.

Per the impact analysis in Section 4.13, eight special-status species that are difficult to detect during surveys may be present in mesic (wet) habitats. RPMs BIO-2 and BIO-3 incorporated into the project require that once a project alternative is selected and construction is approved, a complete pre-construction floristic survey be conducted in construction activity areas (including all vehicle travel routes), and lands within 50-feet of construction activity areas. The pre-construction floristic survey will include all rare plants, fungi, and non-native invasive plants, and be conducted during a time that coincides with the greatest number of blooming periods for target species. Therefore, additional opportunities to identify special-status plants would occur prior to construction. The requirement for pre-construction surveys also provides the opportunity to identify new occurrences of species that may have become established between the time of field surveys in support of the EIS/EIR and the initiation of project construction.

This comment also refers to the Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. Because the same Gazex avalanche mitigation system was included for all action

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alternatives, survey results and potential impacts associated with the system identified for Alternative 2 also apply, without change, to Alternatives 3 and 4. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

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- 0167-13 cont'd
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- The impacts to special status plants should be reassessed after conducted appropriately timed field surveys for these resources. In addition, it is not clear that the analysis of impacts for Alternatives 3 and 4 adequately assessed the impacts associated with construction of the proposed avalanche mitigation system.
- 0167-14
- The Botany Section documents three noxious, invasive plants in the project area, and comments on their expansion during the several years that baseline studies were taking place. This speaks to the high threat invasive plants pose to natural areas in the project vicinity, and the high potential for moving invasive plants established in the project area into new habitats. This impact is underestimated in the analysis, particularly the potential for spread of propagules from existing populations to habitats in the Granite Chief Management Area. While RPMs such as tire washing are proposed, these measures should only be implemented as a last recourse; avoidance of disturbances that facilitate invasions of noxious species into sensitive habitats would eliminate the potential impact entirely. While the proposed RPMs can reduce the risk of introducing invasive plants into this sensitive wildland area they cannot eliminate the risk. As the Center for Invasive Plant Management states in its Invasive Plant Prevention Guidelines (which are based on the USDA Forest Service's "Guide to Noxious Weed Prevention Practices") "The most effective, economical, and ecologically sound approach to managing invasive plants is to prevent their invasion in the first place."
- 0167-15
- Section 4.14 Wildlife and Aquatics**
- Perhaps one of the most significant impacts of the proposed project would be to wildlife and aquatic species, in particular, the Federal Endangered and California Threatened Sierra Nevada Yellow-legged Frog (SNYLF). The Wildlife and Aquatics Section lacks context crucial to making informed decisions about this project. For example, the Sierra Nevada Ecosystem Project (SNEP) found that aquatic, riparian and meadow ecosystems are the most degraded in the Sierra Nevada and many aquatic and riparian species are at risk of extirpation. As a result, SNFPA Goals are to: "protect and restore desired conditions of aquatic, riparian, and meadow ecosystems in Sierra Nevada national forests; and provide for the viability of species associated with those ecosystems." Furthermore, the Mountain Yellow-legged Frog Conservation Assessment for the Sierra Nevada Mountains of California, USA (USDA 2014) emphasizes the importance of conserving populations of SNYLF throughout its range to ensure genetic diversity is maintained. The proposed project is within the Five Lakes Critical Habitat Subunit (Subunit 2D), a relatively small Subunit which has few known populations of SNYLF remaining other than at Barstool Lake. The Five Lakes Critical Habitat Subunit is described as follows:
- "The Five Lakes subunit consists of approximately 3,758 ha (9,286 ac), and is located in the eastern portion of Placer County, California, approximately 2 km (1.25 mi) west of Highway 89 and 12.3 km (7.7 mi) east of Foresthill Road. Land ownership within this subunit consists of approximately 2,396 ha (5,921 ac) of Federal land and 1,362 ha (3,365 ac) of private land. The Five Lakes subunit is located entirely within the boundaries of the Tahoe National Forest, including area within the Granite Chief Wilderness. This subunit 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."*

0167-13 cont'd, Botany (B)

0167-14, Botany (B)

The comment states that the potential to introduce existing invasive plants established in the project area into new habitats, particularly the potential for spread of propagules from existing populations to habitats in the Granite Chief Management Area, is underestimated. The comment further states that while RPMs such as tire washing are proposed, these measures should only be implemented as a last recourse; avoidance of disturbances that facilitate invasions of noxious species into sensitive habitats would eliminate the potential impact entirely.

Multiple RPMs address reducing the risk of introducing or spreading noxious weeds, including RPMs BIO-3 through BIO-8. In particular, RPM BIO-3 requires that before construction activities begin, the applicant will treat invasive plant infestations in the construction activity area, and within 50-feet of the construction activity area, thereby eradicating known noxious weed infestations before construction begins. Other RPMs require that any new invasive plant infestations discovered during construction will be documented, reported to the land owner, and treated where needed as determined by the Forest Service on National Forest System (NFS) lands and by Placer County on private lands. Because the Forest Service invasive plant infestation criteria are more stringent than Placer County's, the same criteria applied by the Forest Service will be applied to private lands. After construction is complete, the applicant will monitor all construction disturbance areas for new noxious weed invasions and expansion of existing weed populations and treat invasive plant infestations where needed as determined by the Forest Service on NFS lands and by Placer County on private lands. Post-construction monitoring for noxious weeds would be conducted annually for three years. The comment states that the most effective, economical, and ecologically sound approach to managing invasive plants is to prevent their invasion in the first place. Invasive plants are already present in the project area as described in the Draft EIS/EIR, due to ongoing non-winter recreation, the spread of weeds could still occur, thus implementing RPM BIO-2 through BIO-8 would substantially lessen the potential for invasive weed introductions and spread.

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0167-15, Wildlife and Aquatics (W&A)

The comment provides a summary of SNEP, SNFPA, MYLF Conservation Assessment for the Sierra Nevada Mountains of California, and the USFWS description of the Five Lakes Critical Habitat subunit which are consistent with information provided in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment.

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- 0167-15 cont'd *The physical or biological features essential to the conservation of the Sierra Nevada yellow-legged frog in the Five Lakes subunit may require special management considerations or protection due to the presence of introduced fishes, timber management and fuels reduction, and recreational activities."*
- Barstool Lake is the only habitat known in the project vicinity to be currently occupied by SNYLF. However, Table 5 of the Sierra Nevada Yellow-legged Frog Biological Assessment shows that SNYLF was detected in Barstool Lake in 2004, it was not detected there in 2011, but was detected again in 2015, 2016, and 2017. Therefore, either SNYLF was present in Barstool Lake continuously from 2004-2017 and just was not detected in 2011, or it was locally extirpated and recolonized the habitat. Thus, the distribution and abundance of SNYLF may be underestimated if they avoid detection. Alternatively, as is described in Section 4.14, the project area provides all of the habitat features required by SNYLF, 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. This is precisely why it is considered a Critical Habitat Subunit.
- 0167-16 The Biological Opinion (BO) for the SNYLF in the Sierra Nevada Forests (2017) states that full implementation of all Programmatic Conservation Measures (RPMs) is "essential." These measures are intended to avoid and minimize the potential effects of potential projects, and Forest Service Standards & Guidelines and RPMs are treated as "minimum" requirements by the BO. The proposed project is inconsistent with the resource protection goals and objectives of the TNF LRMP, SNFPA, Designated SNYLF critical habitat, Sierra Nevada SNYLF BO, and Placer County General Plan policies requiring avoidance of sensitive resources as the top priority. The proposed project does not avoid or minimize impacts to wildlife and aquatic resources, and, in particular, does not avoid or minimize impacts to the SNYLF and its Critical Habitat. As proposed, the project would cause further adverse and unmitigable impacts to Critical Habitat and a population of an already imperiled Federally Endangered and California Threatened species.
- 0167-17 The proposed project adversely affects aquatic resources, and would cause significant impacts to the SNYLF. The TNF LRMP states that there are already existing "intense recreational impacts in the Five Lakes Basin" that Alternative 2 of the proposed project could exacerbate through a variety of direct and indirect impacts that are outlined in Section 4.14. However, given the lack of detail in the project description, it is unclear if the assumptions used to calculate impacts to wildlife and aquatic resources are appropriate. For example, the document suggests that impacts to the species could occur through accidental releases of chemicals and hazardous materials, elevated construction noise, and increased human activity, but there is no specific discussion or quantification of these potential impact factors, and the analysis assumes an impact corridor of just 20-25 feet wide. This assumption is not justified by a detailed description of the types of equipment and noise levels expected to be generated, the level of human activity, amount of chemicals, quantity and disposition of blasted materials, etc., and therefore it is unlikely that potential project impacts associated with these factors have been adequately assessed, especially considering the terrain. The section does suggest that chemicals with known toxicity to amphibians (e.g., 2,4-Dinitrotoluene) can be generated by the project; however, the use of an LD50 (Lethal Dose to 50% of the test organisms) as an impact standard is inappropriate for a federally listed endangered species.
- 0167-18 Section 4.14 states "Long-term impacts on biological resources would occur in or adjacent to habitats that would experience a permanent conversion in land use and cover (i.e., conversion of natural

0167-15 cont'd, Wildlife and Aquatics (W&A)

The definition of "occupied" as used in the paragraph referenced by the commenter comes from the US Fish and Wildlife Service Amendment of the Programmatic Biological Opinion on Nine Forest Programs on Nine National Forests in the Sierra Nevada of California for the Endangered Sierra Nevada Yellow-legged Frog, Endangered Northern Distinct Population Segment of the Mountain Yellow-legged Frog, and Threatened Yosemite Toad (USFWS 2017). In this document, the Service defines the types of habitat (i.e., occupied), and the likelihood that listed amphibians are present is based on existing available survey data collected within the last 10 years or new survey data collected for the project. In this case Barstool Lake was considered occupied because frogs were observed in 2015. If no Sierra Nevada yellow-legged frogs had been observed at Barstool Lake during the project surveys, the habitat would have been considered as *unutilized potential* (not occupied) as per the PBO.

0167-16, Wildlife and Aquatics (W&A)

Appendix B of the Draft EIR/EIS contains all the Resource Protection Measures (RPMs) included as part of the action alternatives. The RPMs were developed by the Forest Service and Placer County and resource specialists in the pre-analysis and analysis phases to reduce environmental impacts and comply with applicable laws and regulations. They include, but are not limited to, best management practices (BMPs), Forest Service standards and guidelines, Placer County standard permit conditions, and standard operating procedures. RPMs come from federal, state, and local laws, regulations, and policies; forest plans; scientific research; and the experience provided by lead agencies and consulting specialists in designing similar projects.

The comment asserts that the proposed project does not avoid or minimize impacts on sensitive resources, including aquatic resources and SNYLF and its critical habitat. However multiple RPMs in Section 4.14, "Wildlife and Aquatics" call for avoidance of these resources, including RPM BIO-9 (avoidance or rare plants), BIO-21 (special-status birds), BIO-26 (aquatic habitats). Avoidance of impacts on aquatic habitats would also result in avoidance of potential adverse effects on SNYLF. Avoidance of impacts on aquatic habitat within designated SNYLF critical habitat areas would also result in

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avoidance of potential adverse effects on SNYLF critical habitat.

As set forth in the Draft EIS/EIR, the proposed project and action alternatives would have direct and indirect effects on SNYLF critical habitat. The project incorporates multiple RPMs to lessen these impacts, to the extent feasible, as required by Forest Service and County policy. For those impacts that cannot feasibly be avoided, mitigation is recommended that would require compensatory habitat. For this reason, the project would not result in a net reduction of SNYLF critical habitat.

0167-17, Wildlife and Aquatics (W&A)

The comment states that the proposed project adversely affects aquatic resources, and would cause significant impacts to SNYLF. This statement is consistent with the Draft EIS/EIR's analysis. (See Draft EIS/EIR, Impact 4.14-1 (Alt. 2): Direct and Indirect Effects on Sierra Nevada Yellow-Legged Frog.)

The comment notes that the TNF LRMP states that there are already existing "intense recreational impacts in the Five Lakes Basin" that Alternative 2 of the proposed project could exacerbate through a variety of direct and indirect impacts that are outlined in Section 4.14. The comment states that there is insufficient information to determine whether the assumptions used to calculate impacts to wildlife and aquatic resources are appropriate. The comment also states that the EIS/EIR provides insufficient information to assess impacts to SNYLF through accidental releases of chemicals and hazardous materials, elevated construction noise, and increased human activity.

Analysis of direct and indirect effects on Sierra Nevada yellow-legged frog which include accidental releases of chemicals and hazardous materials, elevated construction noise, and increased human activity are included in Impact 4.14-1 (Alt. 2, Alt. 3, and Alt. 4) of the Draft EIR/EIS. For example, on page 4.14-48 of the Draft EIS/EIR it is stated "Indirect effects on SNYLF could also occur through the accidental introduction of hazardous materials and chemicals in the form of gasoline, engine oil, lubricants, or other fluids used during construction activities that could potentially enter Barstool Lake or the seasonal streams as a result of spills." Construction noise is

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also addressed on page 4.14-48, and disturbance from human activity is addressed on pages 4.14-48 and 4.14-49.

The comment states that the analysis assumes an impact corridor of 20-25 feet wide. The survey area was 100 feet from each side of centerline of the gondola alignments under each action alternative. Potential impacts of the alternatives on wildlife and aquatic resources were initially identified by overlaying GIS layers of conceptual project components and construction disturbance areas on the land cover maps of the project site and maps of sensitive biological resources. These disturbance areas are shown in Exhibit 4.15-1 and represent the best available information regarding anticipated construction activities for each action alternative. Construction disturbance areas, where they are linear corridors, are all greater than 25 feet wide (with some locations wider than others to accommodate topography and planned facilities). Any natural community and wildlife habitat that overlapped with an area of proposed modification was considered to be directly affected during project construction by that respective alternative. Potential impacts associated with the alternatives were classified as either direct, indirect, or cumulative. Section 4.14.2.1 Methods and Assumptions describe these classifications. Additionally, acreages included in Table 4.14-6 summarize the estimated maximum amounts of habitat alteration or loss assumed for the construction of the action alternatives. Habitat impacts that would occur as a result of constructing temporary access roads and utilities were estimated based on 25-foot width for the access roads; and 20-foot width for the powerline to terminals. These estimates are conservative; the actual amount of habitat affected within those areas is expected to be less. Moreover, RPMs require the applicant to identify and, to the extent feasible, avoid sensitive habitats; these RPMs will require narrower disturbance corridors than those assumed in the EIS/EIR analysis.

The comment also identifies 2,4-Dinitrotoluene as a chemical that can be generated by the project. 2,4-Dinitrotoluene is one of several explosive-residue byproducts from explosive "hand shots" from avalanche mitigation containing pentaerythritoltetranitrate (PETN). The project proposed to use the Gazex avalanche mitigation system, which would have reduced the explosive-residue byproducts to carbon dioxide and water. With the elimination of the Gazex component of the project description, there will be no change in avalanche control methods as compared to existing practices, and no impact will occur.

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The comment also assumed that the LD50 of 2,4-Dinitrotoluene was being used as a standard for the Sierra Nevada yellow-legged frog. The LD50 of 2,4-Dinitrotoluene referenced in the analysis was included to show that the LD50 value of 1,098 milligrams per kilogram on bullfrogs is extremely high when compared to the relatively low concentrations typically observed in the aquatic environments where the U.S. Army Public Health Command on Wildlife Toxicity did their assessments for the referenced research.

The comment identifies areas where, in the commenter's view, additional detail is needed to assess project impacts. The EIS/EIR provides sufficient detail and data to adequately assess the severity and significance of the project's impact on SNYLF. For example, the EIS/EIR acknowledges that oil, lubricants and other materials are typically used during construction, and that if these materials are accidentally released into the environment, SNYLF could be adversely affected. (Draft EIS/EIR, Impact 4.14-1 (Alt. 2), p. 4.14-48.) The implementation of various RPMs in the HAZ category identified in the impact discussion would prevent spills and releases from occurring. (See Draft EIS/EIR, Appendix B, pp. B-7 - B-8.) Detailed information on the type and volume of hazardous materials used during construction is unavailable. Moreover, such detail is not necessary to evaluate the potential impact because an understanding of the general character of materials used during construction, and sufficient RPMs to prevent releases, is sufficient to determine that SNYLF would not be adversely affected.

0167-18, Wildlife and Aquatics (W&A)

The comment references text in Subsection 4.14.2.1 Methods and Assumptions under Section 4.14, "Wildlife & Aquatics," of the Draft EIS/EIR. This section describes concepts such direct and indirect effects and provides both a detailed (e.g., use of GIS layers) and broader conceptual explanation of how impacts were considered and assessed. The paragraph where the quoted text occurs (Draft EIS/EIR page 4.14-34) is provided below. The quoted text is from the last sentence. The subsequent two paragraphs are also provided. The EIS/EIR addresses impacts on wildlife and aquatics in detail in the subsequent individual impact discussions, using the methodology described in Section 4.14.2.1. The comment

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provides no examples or evidence indicating that the impact discussions are insufficient.

"Potential impacts of the alternatives on wildlife and aquatic resources were initially identified by overlaying GIS layers of conceptual project components on the land cover maps of the project site and maps of sensitive biological resources. Any natural community and wildlife habitat that overlapped with an area of proposed modification was considered to be directly affected during project construction by that respective alternative. An estimate of the amount of vegetation removal planned for the clearing of work areas and access ways was estimated to the extent possible. Short-term construction impacts would occur where natural vegetation would be removed to construct new features and facilities or modify existing features. Construction-related impacts could affect biological resources through vegetation disturbance, noise disturbances, stormwater runoff, erosion, and the introduction of invasive or nonnative species. Long-term impacts on biological resources would occur in or adjacent to habitats that would experience a permanent conversion in land use and cover (i.e., conversion of natural vegetation due to installation of towers, and other facilities).

Table 4.14-6 summarizes the estimated maximum amounts of habitat alteration or loss assumed from the construction of the action alternatives. Additional habitat impacts would occur as a result of constructing temporary access roads and utilities. These additional habitat alterations have been estimated based on the following assumptions of affected areas: 25-foot width for the access routes; and 20-foot width for the powerline to terminals (where needed). These estimates are conservative because the actual habitat impacts within those areas is expected to be less.

Impacts on common and sensitive habitats could occur through changes in the amount, distribution and pattern, quality, and function of those communities as a result of project construction and operation. Impacts on special-status species could occur either through short-term habitat degradation/alteration or permanent habitat loss; disturbance of normal activity, reproduction, and dispersal patterns during construction; or through direct mortality. Potential impacts on special-status species were determined by analyzing species life history requirements and known occurrences or potential to occur on the project site. Once the species and habitats were identified, impacts from project activities were analyzed. Direct and Indirect effect analysis is included under Section 4.14

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"Wildlife and Aquatics" which start on page 4.14-41 of the Draft EIS/EIR."

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0167-18
cont'd

vegetation due to installation of towers, and other facilities).” What are the nature of the long-term impacts that would occur “adjacent to habitats that would experience a permanent conversion in land use and cover”? These long-term impacts have not been adequately described and quantified.

0167-19

It is not clear that the analysis of impacts for Alternatives 3 and 4 adequately assessed the impacts associated with construction of the proposed avalanche mitigation system.

0167-20

Impacts to SNLYF must be avoided to the extent practicable, and the proposed project does not achieve this standard. Section 4.14 acknowledges (pg. 4.14-42) that “Implementation of the project would be adverse and is likely to adversely affect SNLYF and its habitat.” Resource Protection Measures (RPMs) and Mitigation Measures are offered to reduce these impacts to an acceptable level. However, the majority of the RPMs merely require personnel training, additional planning and consultation, or an undefined compensatory mitigation program that in my professional experience cannot eliminate the risk of adverse impacts to this highly sensitive resource that would occur if the proposed project was to proceed. Ultimately, mitigating impacts to SNLYF and its Critical Habitat are deferred to a future “consultation with permitting agencies” and an undefined compensatory mitigation plan. Detailed, specific measures that demonstrate how the project would adequately avoid, minimize, then mitigate impacts must be provided now to understand if project impacts actually can be adequately mitigated.

0167-21

The analysis of cumulative impacts is insufficient. The Section acknowledges “Some past and current projects in the region have contributed to an adverse cumulative effect on aquatic habitats” and that the current project will adversely affect wildlife and aquatic resources, but that project design, construction methods and RPMs would result in no cumulative impacts of this project. The document states “Specifically, these measures require that (1) aquatic habitat be avoided to the extent feasible; (2) aquatic habitats that cannot be avoided be restored following construction; (3) any unavoidable losses be compensated for in a manner that results in no net loss of aquatic habitats; and (4) project implementation be consistent with the aquatic and riparian habitat protection provisions of CWA, RWQCB, Fish and Game Code Section 1602, and the Forest Service.” However, has been discussed previously, the proposed project does not avoid aquatic habitat to the extent feasible, is not consistent with many of the regulations and policies cited, and proposed RPMs and Mitigation Measures will not prevent or compensate for the degradation of a highly sensitive and imperiled resource. Cumulative impacts of the proposed project to wildlife and aquatic resources, particularly SNLYF and its Critical Habitat are significant and unmitigated as proposed.

Section 4.15 Wetlands

0167-22

As discussed for Section 4.12 (Vegetation) the significance of impacts should be assessed based on the intensity of the effects within the context that they occur. Project facilities should avoid high quality resources to the extent feasible, but the document does not provide adequate information to make this determination. This section also does not analyze the project impacts for consistency with the objectives for the Granite Chief Management Area.

0167-23

Given the lack of detail presented in the Description of Alternatives, the impact analysis is inadequate, particularly for indirect impacts. For example, the disposition of blasted materials and nature and quantities of chemicals generated by the project could have significant impacts to wetland habitats, and the current project description is inadequate to make that determination.

0167-18 cont'd, Wildlife and Aquatics (W&A)

0167-19, Wildlife and Aquatics (W&A)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, “Master Responses,” for more information on the removal of Gazex from the project.

0167-20, Wildlife and Aquatics (W&A)

Page 4.14-42 analyzes direct and indirect effects on SNLYF critical habitat under Alternative 1 (the no action alternative), which results in a no effect on SNLYF critical habitat under both NEPA and CEQA.

The comment may be referring to Impact 4.14-1 (Alt. 2), which states that implementation of Alternative 2 would result in direct and indirect effects, such as loss of individual SNLYF or occupied habitat. Under NEPA, and considering the NEPA indicators, absent RPMs and/or mitigation, direct and indirect impacts on SNLYF would be adverse. However, implementation of RPMs MUL-1 through MUL-7, HAZ-1, HAZ-3, HAZ-6 through HAZ-8, BIO-1, BIO-7, BIO-18, BIO-19, BIO-21 through BIO-36, BIO-39, SOILS-1, SOILS-3 through SOILS-5, SOILS-9, SOILS-11, SOILS-12, WQ-1, WQ-4 through WQ-6, WQ-8 through WQ-20, TREE-1, TREE-6, and TREE-7 would partially mitigate the effects on these resources through habitat avoidance, habitat restoration, and direct species protection measures. See Sections 4.6, 4.9, 4.16, and 4.17, which list additional RPMs that would reduce effects on special-status aquatic wildlife. The comment states that the project is inconsistent with the avoidance of SNLYF impacts where feasible. A number of the RPMs incorporated into the project focus on avoidance of such impacts. (See, e.g., RPM BIO-19, which requires avoidance of SNLYF, and limits disturbance around riparian conservation areas.) However, because the RPMs do not contain mechanisms for compensating for the loss of all potential suitable habitat, these effects are addressed by Mitigation Measure 4.14-1 (Alt. 2) through consultation with permitting agencies. Thus, multiple RPMs require avoidance and minimization of impacts, and Mitigation Measure 4.14-1 (Alt. 2) requires compensation

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where complete avoidance is infeasible. See response to comment 0167-16, above.

0167-21, Wildlife and Aquatics (W&A)

The comment states that the analysis of cumulative impacts is insufficient. Cumulative Effects are analyzed in subheading 4.14.4 Cumulative Effects on page 4.14-110 of the Draft EIS/EIR. The comment does not identify the specific reasons why the cumulative impact analysis is insufficient or inadequate. The comment reiterates issues addressed in comments/responses above. See the responses above related to these issues.

The comment also quotes findings within the cumulative analysis but states that the proposed project does not avoid aquatic habitat to the extent feasible, is not consistent with many of the regulations and policies cited, and proposed RPMs and Mitigation Measures will not prevent or compensate for the degradation of highly sensitive and imperiled resource. Cumulative Effects are analyzed in subheading 4.14.4 Cumulative Effects starting on page 4.14-110 of the Draft EIS/EIR. The comment does not provide specific reasons specifying how the project does not avoid aquatic habitat to the extent feasible, how it is not consistent with the provisions of the CWA, RWQCB, Fish and Game Code 1602, and the Forest Service, or how the RPMs and Mitigation Measures do not prevent or compensate for the degradation of "highly sensitive and imperiled resource". Again, see responses above identifying why the implementation of RPMs and mitigation measures follow the suggested sequence of avoidance and mitigation and is consistent with provisions of applicable laws and regulations. As noted in response to comment 0167-21, RPMs require avoiding and minimizing impacts to SNYLF wherever feasible. Compensatory mitigation, as required by Mitigation Measure 4.14-1, has been identified in those instances where such avoidance and minimization is infeasible.

0167-22, Wetlands (W1)

See response to comment 0167-8, above, which addresses Draft EIS/EIR Section 4.12, "Vegetation."

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See response to comment 0167-2, above, regarding the action alternatives and the Granite Chief Management Area.

The comment states that project facilities should avoid high quality resources to the extent feasible, and states further that the EIS/EIR does not provide adequate information to make this determination. The comment provides no examples or evidence regarding the perceived inadequacy of EIS/EIR information. Section 4.15, "Wetlands," of the Draft EIS/EIR assesses the effects of the project on wetland resources based on wetland/habitat type, making distinctions between ponds, mountain alder thicket, freshwater emergency wetland, etc. All action alternatives have total wetland impacts between 1.44 and 1.75 acres (see Draft EIS/EIR Tables 4.15-2 through 4.15-4). Providing information on the type and acreages of wetland habitats affected is sufficient to assess the intensity/significance of environmental effects on these resources. In addition, the RPMs require, in order of priority, (1) avoidance, (2) minimization, (3) restoration, and (4) compensation, with compensation relied upon only where avoidance, minimization and restoration have already been applied, and further avoidance/minimization/restoration is infeasible. This same approach is applied to all resources that fall under the jurisdiction of applicable wetland regulations. Preliminary design of the project elements and proposed construction areas has been designed to minimize impacts to sensitive areas, including wetlands, as much as possible. RPMs BIO-24, BIO-25, BIO-26 would require minimization of ground disturbance and vegetation removal, especially in riparian areas/RCA; any work conducted within 100 feet of waters of the United States, waters of the State, and wetlands, and within RCAs designated by the Forest Service will require the presence of an environmental monitor to oversee the activities. Furthermore, if an aquatic habitat cannot be fully avoided, prior to disturbance of the habitat, a delineation of the water of the United States would need to take place and would have to be submitted to the USACE for verification, and affected wetlands would have to be restored, or compensation would have to be provided, in order to meet the "no net loss" policy of USACE.

0167-23, Wetlands (W1)

The comment states that the Draft EIS/EIR does not provide sufficient detail regarding the disposition of blasted materials and the nature and quantity of chemicals generated by the

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project to assess the significance of impacts these materials could have on wetland habitats.

The Draft EIS/EIR Chapter 2, "Description of Alternatives," identifies that neither materials generated by blasting nor chemicals generated by the project (hereafter referred to as hazardous materials in this response) would enter wetland habitats; therefore, no significant adverse effect on wetlands would occur as described below.

Chapter 2, "Description of Alternatives," describes a reasonable range of alternatives for the project, along with general construction, operation and long-term maintenance. As part of the general construction, blasting may be required for the Squaw Valley mid-station, Alpine Meadows mid-station and some tower footings. The overall disturbance from blasting would be dependent on location. Blasting typically involves drilling holes in the rock for the explosives using pneumatic drilling equipment. As stated on Page 2-13 of the Draft EIS/EIR, for blasting, typically an array of several holes is drilled, loaded, and wired to a detonator, and the array is triggered in a single "shot." When there is a need to protect structures or sensitive resources, blasting mats would be laid over the array of holes to contain the explosion and reduce the amount of shot rock, or eliminate it, from flying out of the immediate vicinity of the blasting zone. After the blast, excavators may be needed to remove debris and achieve the necessary excavation. The blasted rock would be incorporated into the surrounding disturbance areas (Draft EIS/EIR page 2-13). Wetlands qualify as a "sensitive resources," therefore, blasting mats would be used to prevent "shot rock" from leaving the blasting site and entering wetlands. Blasting sites are included in the construction disturbance area defined for each alternative. Therefore, blasting, and the incorporation of blasted rock "into the surrounding disturbance areas" would not result in wetland habitat impacts beyond those identified in the Draft EIS/EIR (as described in Sections 4.12, "Vegetation;" 4.14, "Wildlife and Aquatics;" 4.15, "Wetlands;" and 4.17, "Hydrology and Water Quality"). In addition, RPM WQ-8 requires that no debris be placed in wetlands (which would include blasted rock) and RPM BIO-25 requires that an environmental monitor be present if work is to occur within 100 feet of waters of the United States, waters of the State, wetlands, and within RCAs designated by the Forest Service. The monitor would assist in ensuring that impacts to wetland habitats do not exceed those identified in the Draft EIS/EIR and/or subsequent permits from regulatory agencies (e.g.,

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USACE). Multiple other RPMs also address the avoidance and protection of wetland habitats. The information provided here is sufficient to identify that blasting activities would not result in effects on wetland habitats different from those already identified in the Draft EIS/EIR.

Similarly, there are multiple RPMs identified in the Draft EIS/EIR, as well as existing regulations, that address the prevention of hazardous materials from entering wetland habitats. For example, the description of the regulatory setting provided in Section 4.17, "Hydrology and Water Quality" describes the Clean Water Act Section 401 and 402 National Pollutant Discharge Elimination System (NPDES), NPDES Permits, the California Porter-Cologne Water Quality Control Act, and the General Permit for Storm Water Discharges Associated with Construction Activity, all of which have a role in preventing hazardous materials from entering waterways. In addition, RPMs MUL-6, HAZ-1, HAZ-5, HAZ-6 HAZ-7, and HAZ-8 all relate to the proper use, storage, and disposal of hazard materials and preventing the release of hazardous materials. Please see response to comment 0167-17, above. There is sufficient evidence in the Draft EIS/EIR to conclude that the potential for a release of hazardous materials that could adversely affect wetland habitats is not sufficient to result in a significant adverse effect.

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- 0167-24 The project is inconsistent with federal, state, and local policies on wetland protection. For example, the Sierra Nevada Forest Plan Amendment's (SNFPA's) Aquatic Management Strategy goals are to "maintain and restore" wetlands and special aquatic habitats. Placer County General Plan Policy 6.B.2 seeks "no net loss" of wetlands by prioritizing avoidance of impacts to wetlands to compensatory mitigation, which is consistent with U.S. EPA's "mitigation sequencing" guidelines for wetlands. The proposed project does not prioritize avoidance of wetland impacts but relies on undefined future compensatory mitigation to reduce the project's significant impacts. In fact, the proposed project would incur greater wetland impacts than at least one of the other action alternatives, even without refining the analysis of impacts with additional details on construction and removing the avalanche mitigation system from Alternatives 3 and 4.
- 0167-25 It is not clear that the analysis of impacts for Alternatives 3 and 4 adequately assessed the impacts associated with construction of the proposed avalanche mitigation system.
- 0167-26 The cumulative impact section is inadequate. CEQA defines the cumulative impact from several projects as the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The document states that cumulative conditions are already adversely affected, but suggests that since there are laws and regulations requiring avoidance, minimization, and mitigation of wetland and waters impacts, there is no cumulative impact of the proposed project. This is circular logic at best since the proposed project itself doesn't follow these mitigation sequencing guidelines. The proposed project would clearly cause a cumulatively significant adverse impact to wetlands and aquatic habitats.

0167-24, Wetlands (W1)

The comment states that the project is inconsistent with federal, state, and local policies on wetland protection and provides examples which include the Sierra Nevada Forest Plan Amendment's (SNFPA's) Aquatic Management Strategy goals that are to "maintain and restore" wetlands and special aquatic habitats; Placer County General Plan Policy 6.B.2 which seeks "no net loss" of wetlands by prioritizing avoidance of impacts to wetlands to compensatory mitigation, which is consistent with EPA's "mitigation sequencing" guidelines for wetlands.

Section 4.15, "Wetlands," analyzes effects to wetland resources. To minimize impacts to wetland resources the project includes several RPMs to further minimize effects, including preventing erosion and runoff, and requiring that aquatic habitats be avoided to the extent feasible. If avoidance is infeasible, then a wetland delineation must be prepared and submitted to USACE, and compensation must be provided such that there is "no net loss" of wetland habitat.

The RPMs are consistent with the approach of (1) avoiding wetlands, (2) minimizing disturbance, (3) restoring disturbance in place, and (4) providing compensatory habitat as a final option. As stated in RPM BIO-26, "[t]he project will be designed to avoid disturbance to, and vehicle travel in, identified aquatic habitats..." If an aquatic habitat cannot be fully avoided, then the permitting process for fill of wetland habitats will be implemented. However, even if the permitting process is initiated, RPM BIO-26 identifies in the last sentence that "[i]mpacts will be minimized to the extent practicable." RPM BIO-26 identifies that disturbed wetland areas will be restored to pre-project conditions, and provides consistency with the USACE no net loss policy as a performance criteria.

The statements in the comment regarding the effects of Alternative 2 on wetland resources relative to the other action alternatives is correct, consistent with the results provided in Tables 4.15-2 through 4.15-4 of the Draft EIS/EIR. This information is incorporated into the determination of the Environmentally Superior Alternative provided in Section 5.2.4 of the Draft EIS/EIR.

0167-25, Wetlands (W1)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR.

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However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0167-26, Wetlands (W1)

The comment states that the analysis of wetlands impacts is inadequate, provides a summary of the CEQA cumulative impact definition, and cites the Draft EIS/EIR's statement that cumulative conditions are already adversely affected, but suggests that since there are laws and regulations requiring avoidance, minimization, and mitigation of wetland and waters impacts, there is no cumulative impact of the proposed project. The comment labels this approach as "circular logic" and states that the proposed project does not follow appropriate policies concerning the hierarchy of mitigation for impacts to wetlands.

See response to comment 0167-24, above, regarding the project's adherence to wetland avoidance/mitigation sequencing guidelines.

Section 4.15, "Wetlands," analyzes potential effects on wetland resources. This section includes an analysis of cumulative effects. The analysis states that impacts on wetlands and waters resulting from implementation of the Gondola would be permanent, resulting from direct fill of waters of the United States and waters of the state, and temporary, related to activities during construction. Construction activities would be required to comply with existing federal, state, and local regulations and permitting requirements that protect wetland, riparian, and other waters. RPMs BIO-24 through BIO-26, BIO-34 through BIO-36, and BIO-39 would reduce significant impacts on wetlands and waters because they would require that aquatic habitat is avoided to the extent feasible, and that aquatic habitats that cannot be avoided are restored following construction or that, if restoration is infeasible, compensation would be provided in a manner that results in no net loss of these habitats or loss of ecological function. Based on the no net loss standard required by state and federal laws, the project would not have a considerable contribution to the overall adverse cumulative effect on waters and wetlands in the spatial scope of this analysis. This cumulative impact analysis states that there would be impacts to wetlands, and

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that they would be mitigated through both minimization of impacts and the wetlands compensation process.

The "logic" of the Draft EIS/EIR's approach is not circular. The EIS/EIR appropriately acknowledges that applicable laws and regulations would be implemented during project implementation, and then identifies the outcome of compliance with these laws and regulations. Compliance with Section 404 of the Clean Water Act requires that there be no net loss in wetland functions and values. If, at the end of project implementation, there is no net loss of wetland functions and values attributable to the proposed project, then it is logical to conclude that the proposed project would not make a considerable contribution to cumulative wetland impacts. That is, even if under cumulative conditions there has been a significant impact to wetlands resources, project would not contribute further to that cumulative impact.

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Dr. White is an ecologist with 30 years of professional experience with conservation planning, environmental regulations, and ecosystem assessment, management, and restoration. His work has required extensive coordination with local government agencies, state and federal wildlife and land management agencies, local academic and research institutions, non-governmental organizations, private and foundation funders, landowners, and the general public.

Dr. White has served as the lead biologist on many high-visibility and multi-stakeholder projects in California. These included developing management and restoration strategies for the Lower Colorado River Multiple Species Conservation Program, developing a reserve design and adaptive management plan for the Tejon Ranch, producing a conservation framework for Las Californias Binational Conservation Initiative, resource management planning for the Sonoran Desert in California, and identifying conservation priorities and forest management strategies for the Sierra Checkerboard Initiative. In these efforts, he has used an objective science-based approach to develop practical land use and conservation outcomes that are trusted by diverse stakeholders.

From 2004-2008, Dr. White was science advisor to the environmental groups that negotiated the Tejon Ranch Conservation and Land Use Agreement, which conserved 90% of the 270,000-acre Tejon Ranch, the largest private property in California. The Agreement created the Tejon Ranch Conservancy to steward its diverse and unique conservation resources. Dr. White served as the Conservancy's first Conservation Science Director from 2009-2017, where he hired and directed staff to develop and implement Science, Stewardship, and Public Access programs; developed partnerships with universities, governmental agencies, and other nonprofits; helped to develop and implement organizational policies and procedures necessary to obtain the Conservancy's accreditation from the Land Trust Alliance; and worked closely with the Executive Director and Board to acquire funding to purchase over 60,000 acres of conservation easements and support the Conservancy's programs. He led public education tours and taught the California Naturalist course for 3 years as part of developing the Conservancy's volunteer program. Working collaboratively with the landowner, Dr. White prepared the first adaptive management plan for Tejon Ranch, and worked with the landowner and its ranching lessees to raise funding to implement elements of the plan.

Dr. White presently a Visiting Scholar at University of California Berkeley Department of Environmental Sciences, Policy and Management, an Adjunct Associate Professor at San Diego State University Department of Biology, and Principal of Michael White Consulting, which advises nonprofit organizations on conservation and management issues.

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EDUCATION

Ph.D. Ecology, San Diego State University and University of California, Davis, 1991.
Dissertation: *Horizontal distribution of pelagic zooplankton in relation to predation gradients*.
B.A. Ecology, Behavior and Evolution, University of California, San Diego, 1982.

PERSONAL

Born July 20, 1960, Los Angeles, California (citizen of U.S.A.).
Married.

PROFESSIONAL ORGANIZATIONS AND AFFILIATIONS

Visiting Scholar, Department of Environmental Sciences, Policy and Management, University of California Berkeley 2017-present
Adjunct Associate Professor, San Diego State University 1991-present
Society for Conservation Biology
Southwest Association of Naturalists
Society for Range Management
Natural Areas Association
California Native Plant Society

EMPLOYMENT HISTORY

August 2017 – present. Principal, Michael White Consulting. Providing environmental consulting services to nonprofit organizations in the areas of habitat and species conservation, land management and monitoring, research facilities siting, and fundraising.

July 2017 – present. Visiting Scholar, University of California Berkeley, Department of Environmental Science, Policy and Management. As a Visiting Scholar, Dr. White is continuing his work with Dr. Bartolome and his lab members developing models for conservation management of rangeland resources in California. Building on years of collaborative field ecology studies of grasslands and riparian systems at Tejon Ranch, Dr. White is working with the lab to synthesize these findings into a deeper understanding of system structure and function and implications for conservation management of rangeland resources in an under-studied part of California.

August 2009 – June 2017. Conservation Science Director of the Tejon Ranch Conservancy. Responsible for developing and implementing research, management, and public access programs for 240,000 acres of Tejon Ranch. Responsibilities included research and monitoring, development and implementation of a Ranch-wide Management Plan for conserved lands, science staff supervision, coordination of research projects, fundraising, and annual planning and budgeting.

July 1999 – July 2009. Senior Ecologist and San Diego Director of the Conservation Biology

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Institute, Encinitas, California. Providing administrative and fiscal oversight of a four-person operation with a budget of approximately \$500K/yr. Responsibilities include annual budgeting, fundraising and proposal preparation, oversight of office contracts, staff timekeeping and project tracking, accounts payable, accounts receivable, project management, and technical studies.

July 1998 – July 1999. Senior Technical Specialist. Ogden Environmental and Energy Services Co., Inc., San Diego, California. Responsibilities included providing technical oversight of the Lower Colorado River Multiple Species Conservation Program project and senior technical support of project staff.

January 1997 – June 1998. Manager, Aquatic Sciences Group. Ogden Environmental and Energy Services Co., Inc., San Diego, California. Managed a group of nine professional aquatic scientists with revenues of approximately \$2M/year. Responsibilities included administration, marketing and proposal preparation, strategic planning, annual budgeting and performance tracking, timekeeping oversight, personnel supervision (including direct supervision of four professional biologists), project management, and project technical support.

January 1994 – December 1996. Deputy Manager, Biological Resources Group, Ogden Environmental and Energy Services Co., Inc., San Diego, California. Deputy Manager for a group of 23 professional biologists. Responsibilities included marketing and proposal preparation, strategic planning, annual budgeting, group health and safety program oversight, personnel supervision (including direct supervision of five professional biologists), project management, and project technical support.

September 1989 – July 1994. Senior Ecologist, Ogden Environmental and Energy Services Co., Inc., San Diego, California. Responsibilities included marketing and proposal preparation, project management, project technical support, and direct supervision of three professional biologists.

September 1983 – December 1990. Graduate Assistant, San Diego State University, San Diego, California.

July 1984 – June 1985. Graduate Assistant, UC Davis Tahoe Research Group, Lake Tahoe City and Davis, California.

SELECTED PROJECT EXPERIENCE

Conservation Science Director – Tejon Ranch Conservancy. As the first Conservation Science Director of the new Conservancy, Dr. White was responsible for creating the Conservancy's science and stewardship programs from scratch. This entailed synthesizing existing information, prioritizing research and monitoring efforts, planning and budgeting, developing funding proposals, coordinating researchers and contractors, interfacing with the landowner, overseeing conservation easement stewardship, and hiring and managing staff. He regularly presents to public, as well as academic and professional audiences on the work of the Conservancy.

One of Dr. White's primary responsibilities at the Conservancy was preparing the first adaptive management plan for the conserved lands at Tejon Ranch (called the Ranch-wide Management

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Plan [RWMP]). The Tejon Ranch Conservation and Land Use Agreement provides for the continued use of lands under easement by the landowner, the Tejon Ranch Company, for commercial ranching, hunting and other compatible uses. Thus, the focus of the RWMP was to maintain, enhance and restore conservation values within a private, working lands context. Working with contractors, academic partners, and citizen scientists, the Conservancy's Science Program has been inventorying the natural resources on Tejon Ranch, elucidating drivers of ecosystem structure and function, and hypothesizing management actions to enhance resource conditions to inform resource management planning. The RWMP defined the Conservancy's rationale and vision for adaptive management at Tejon, and established Best Management Practices (BMPs) for the landowner's land uses to protect and, where feasible, enhance conservation values.

Following adoption of the RWMP in 2013, Dr. White's focus has prioritized and implemented stewardship actions laid out in the plan. These have primarily involved cattle grazing management to achieve conservation objectives in grasslands and riparian and wetland ecosystems across tens of thousands of acres of Tejon Ranch. Grasslands enhancement projects seek to use cattle to reduce the biomass of nonnative Mediterranean grasses to favor native forb species and improve habitat structure for native animals. Riparian and wetland enhancement projects intend to reduce livestock grazing pressure during summer and fall months to enhance diversity, cover and structure of vegetation communities to improve habitat condition and function. These grazing management projects have required installation and reconfiguration of ranching infrastructure (e.g., fences and water systems) to enable the desired conservation grazing management, which has required extensive coordination with the landowner, ranching operators, funding and permitting agencies, and contractors.

Dr. White facilitated an extensive amount of external research at Tejon Ranch, with over 40 research projects started on the property during his tenure. These projects ranged in scope from species inventories, habitat modeling, population dynamics, climate change responses and adaptation, and various geological investigations. Dr. White served on several graduate committees for Tejon-related projects and has overseen several group projects with universities. He developed and coordinated the first Citizen Science projects at Tejon Ranch, co-taught the Conservancy's California Naturalist (Master Naturalist) course to members of the public, and frequently led public tours.

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*REGIONAL HABITAT CONSERVATION PLANNING,
MONITORING, RESTORATION, AND MANAGEMENT*

State Wildlife Action Plan Forest and Rangelands Companion Plan Development Team – California Department of Fish and Wildlife. While with Tejon Ranch Conservancy, served as part of a technical advisory group to the Department and their consultant team during the development of the Forest and Rangelands Companion Plan to California's State Wildlife Action Plan revision in 2016. The role of the advisory group was to help identify conservation issues and strategies pertinent to forest and rangeland ecosystems.

California Landscape Conservation Collaboration Technical Advisory Team. While with Tejon Ranch Conservancy, served on the Technical Advisory Team for the development of a Strategic Plan and Scientific Management Framework for the California LCC. The role of the advisory group was to provide technical input to LCC staff on conservation and adaptive management issues in the planning area.

Yuba Foothills Conservation Assessment – The Trust for Public Land. Dr. White prepared a conservation assessment of a 600,000-acre study area in the northern Sierra Nevada foothills. The purpose of the assessment was to identify meaningful conservation objectives and opportunities and provide a case statement for the study area to guide TPL's land conservation work. As part of the assessment, Dr. White conducted a landscape integrity analysis for the entire northern Sierra Nevada foothills subregion as a way of providing a regional context for the conservation values of the study area.

Effective Conservation and Management of the Sonoran Desert of California – The Nature Conservancy. Working with TNC, CBI evaluated ways of increasing the effectiveness of conservation and management over the 6 million-acre portion of the Sonoran Desert ecological region within California. CBI and TNC made use of the Marxan reserve selection algorithm to identify portions of the study area that support specific conservation values, and then identified how existing land ownership and management patterns protect these conservation values from an array of potential threats, including land conversion, inappropriate recreational activities, mining, alternative energy production, and exotic plant species. The results of this project will be used to guide TNC's conservation activities in the region.

Northstar Habitat Management Plan – Booth Creek. Dr. White provided technical review of the Habitat Management Plan (HMP) developed for the 8,000-acre Northstar at Tahoe ski resort in the Martis Valley, California. Development of the HMP was an obligation of the settlement agreement between Northstar and local environmental organizations for which Dr. White served as a technical expert. The Northstar ski resort supports areas of relatively intact late seral conifer forest supporting species such as California spotted owl, pine martin, and northern goshawk, as well as high quality riparian and aquatic habitats, meadows, and deer fawning habitat. The HMP will be used to guide expansion of the ski resort authorized by the settlement agreement, and forest management measures to enhance late seral forests and other habitats on the property.

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Tejon Ranch Reserve Design. CBI, working with the South Coast Wildlands Project, developed a science-based reserve design for the 270,000-acre Tejon Ranch. The reserve design used a series of conservation planning principles and the results of previous CBI studies conducted for the Ranch to design and justify a reserve that captures regional conservation objectives, such as habitat representation goals, protection of intact watersheds, rare and endangered species protection and recovery, and maintenance of intact core reserve areas. The reserve design underwent peer review by a group of academics, resource agency staff, and local experts. The final reserve design was provided to stakeholders with an interest in significant conservation on Tejon Ranch for use in negotiations with the landowner.

Environmental Monitoring and Habitat Management Planning Program for the Ramona Grasslands – The County of San Diego Department of Parks and Recreation and The Nature Conservancy. Dr. White was the lead scientist for the development of a habitat management plan for the Ramona Grasslands in central San Diego County. The Ramona Grasslands are a regionally important conservation area, supporting a variety of target resources, including vernal pools and rare vernal pool species, Stephens' kangaroo rat, wintering and breeding raptors, riparian habitats and arroyo southwestern toads, and native grasslands. Development of the management plan was preceded by a 2-year baseline field monitoring program that was coordinated by Dr. White. The Ramona Grasslands are grazed by cattle, which maintain habitat suitability for some species but can adversely affect other natural resources. The adaptive management plan proposed a managed grazing strategy to balance these resource needs and optimize habitat quality across the preserve. Monitoring activities proposed by the management plan include surveys of grassland, vernal pool, and riparian plants; characterization of stream channel geomorphology and water quality; and avian, small mammal, amphibian, and fairy shrimp surveys. The management plan built on the science foundation CBI articulated for the Ramona Grasslands in the Framework Management Plan previously developed for The Nature Conservancy.

Hydrologic and Hydraulic Assessment of Santa Maria Creek – The Nature Conservancy. Dr. White was the lead scientist for a project conducted in collaboration with researchers from San Diego State University's Department of Geography. The purpose of the project was to analyze historic, current, and future hydrologic and hydraulic regimes, and associated changes in channel geomorphology and riparian vegetation of Santa Maria Creek, Ramona, San Diego County. The analysis focused on how changes in land uses in the watershed affect runoff quantity, stream discharge and stage, and channel geomorphology and riparian vegetation distribution. Historic land uses were quantified from California Department of Water Resources land use maps and historic channel geomorphology and riparian vegetation distribution from historic aerial photography. Future land use was projected from County of San Diego General Plan information. This information is being incorporated into management planning for the Ramona Grasslands Open Space Preserve, which is traversed by Santa Maria Creek.

Shirrtail Creek Forest Property Conservation Assessment – Endangered Habitats Conservancy and California Wildlife Foundation. Dr. White prepared a conservation assessment to support the acquisition of the 1,000-acre Shirrtail Creek Forest Property outside of Foresthill, California in the northern Sierra Nevada. The assessment characterized the resource values of the property, which included pristine reaches of Shirrtail Creek, oak woodlands, and old-growth conifer forests, special status species supported by the property, and the role of the property

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in regional connectivity.

El Monte Valley Restoration Project – Endangered Habitats Conservancy. Dr. White is directing restoration planning for approximately 450 acres of the San Diego River and its floodplain in the El Monte Valley, Lakeside, California. The riverine functions and values of the site are currently compromised by a lack of surface-water hydrology due to the El Capitan dam upstream of the site, lowered groundwater elevations from groundwater withdrawals, and significant invasion of the river channel by exotic species. The project entails coordinating the design of the restoration project with a groundwater recharge project proposed for the Valley by the Helix Water District. Dr. White coordinated field studies within the project area including vegetation mapping, avian point counts, and establishment of a bird banding (MAPS) station.

Conservation Assessment of Ranch Guejito. CBI prepared a conservation assessment for the 20,000-acre Rancho Guejito in northern San Diego County, one of the most important conservation targets in the region. The assessment documents the conservation significance of Rancho Guejito from both a natural and cultural resources perspective. The assessment evaluated the resources of Rancho Guejito within a Southern California regional context, and assessed its potential contribution to conservation of landscape-scale processes, protecting intact watershed basins, under-protected vegetation associations, and key sensitive species, as well as prehistoric and historic cultural resources. The assessment is being used by conservation organizations to justify and develop strategies for conservation of the property.

Las Californias Binational Conservation Initiative – San Diego Foundation and Resources Legacy Fund Foundation. In partnership with the Mexican non-governmental organization, *Pronatura*, and The Nature Conservancy, CBI designed a conservation reserve for a 2.5 million-acre area of Southern California and northern Baja California. The study area extends from the Sweetwater River watershed in California to the Rio Guadalupe watershed in Baja California. The project used the reserve selection algorithm, *SPOT*, to select a reserve portfolio. The project has required extensive manipulation and merging of various U.S. and Mexican digital datasets (e.g., land cover, roads, digital elevation models, etc.) and cross-walking of different vegetation classification systems. Conservation achievements within the Las Californias Binational Conservation Initiative study area total over 3,500 acres to date, and are currently a priority of local, state, and federal governmental agencies and non-governmental conservation organizations.

Sierra Nevada Checkerboard Initiative – The Trust for Public Land. Ownership in the Central Sierra Nevada is characterized by a “checkerboard” pattern of public and private land, which potentially complicates management of the landscape for conservation, recreational, and timber harvest values. The Trust for Public Land’s Sierra Checkerboard Initiative attempts to affect changes in ownership and management patterns in the northern Sierra to ameliorate the conflicts caused by the checkerboard ownership. Dr. White, working with TPL and its conservation partners, Sierra Nevada Forest Protection Campaign and California Wilderness Coalition, first conducted a science assessment of the 1.5-million acre Sierra Checkerboard Initiative study area to identify high resource value areas, threats to these resources, and spatially explicit management strategies that could be implemented by TPL and its partners to improve resource values. As part of the assessment, Dr. White assembled and worked with a Scientific Advisory Panel of academics and resource agency staff with relevant experience in the Sierra Nevada to advise and review our

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work on the project. Working with TPL's forestry consultant, Dr. White then prepared a conservation strategy that identified priority areas for conservation actions and available private lands conservation approaches. TPL is currently implementing the conservation vision developed for the Initiative.

Tejon Ranch Conservation Assessments – Environment Now and Resources Legacy Fund Foundation. Dr. White was the lead scientist for two assessments characterizing the conservation value of the 270,000-acre Tejon Ranch, California. The Conservation Significance Project was conducted in partnership with the South Coast Wildlands Project and California Wilderness Coalition. The Conservation Significance Project made use of available data, museum records, and expert opinion and assessed the biogeographic importance of the Tejon Ranch, its core habitat and natural community representation values, roadlessness, terrestrial and watershed integrity, importance as a habitat linkage, and habitat for rare and endangered species. CBI also conducted an additional Conservation Assessment Project that identified the distribution of a set of conservation values across Tejon Ranch. Conservation values included threatened, endangered and endemic species distributions, roadless areas analysis, watershed integrity analysis, habitat diversity, and regionally under-protected vegetation communities. As part of the Conservation Assessment Project, CBI conducted a remote sensing analysis to update information on roads, land cover, and vegetation community distributions.

South Coast Missing Linkages Project – South Coast Wildlands Project. Dr. White participated in partnership with the South Coast Wildlands Project, The Nature Conservancy, and Pronatura to conduct planning studies on five important habitat linkages in the U.S.-Mexico border region. The CBI is took the lead on two of the five linkages. One was linking National Forest land in the Laguna Mountains with important habitats in Baja California through the Campo Valley area of San Diego County. The other was linking habitats in the Jacumba Mountains with those in the Sierra Juarez in Baja California.

Habitat Management Planning for the Lake Hodges/San Pasqual Valley MSCP Preserve Area – City of San Diego. Dr. White developed a habitat management plan for the over 9,000-acres Lake Hodges/San Pasqual Valley MSCP Preserve Area. He coordinated a team of specialists comprised of local biologists, the U.S. Geological Survey, and San Diego State University to conduct baseline field surveys and map the distributions of key resources, including vegetation communities, rare plants, Hermes Copper butterfly, herpetofauna (including the endangered arroyo southwestern toad), and breeding riparian birds (including the endangered least Bell's vireo and southwestern willow flycatcher). The management plan addressed issues such as control of adjacent land use impacts, fire management, recreational access, fencing, exotic species control, monitoring, and research.

Monitoring Program for the Santa Margarita River – The Nature Conservancy. Dr. White developed a program to monitor future potential changes in the Santa Margarita River associated with modification of base flows resulting from a water rights settlement on the river. Base flow augmentation resulting from the settlement has been designed to mimic natural discharge patterns historically observed in the river. The objective of the monitoring program was to quantify conditions prior to the modification of base flows and to track changes following base flow augmentation. The monitoring plan was structured around distinct reaches of the river that are

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anticipated to respond similarly to river hydrology. Elements considered in the monitoring plan include biological resources (riparian and coastal stream communities), water quality, discharge, and channel geomorphology.

Regional Conservation Planning and Constraints Analyses for Eastern San Diego Mountains – The Nature Conservancy. CBI worked with The Nature Conservancy and a team of regional scientific experts to prioritize conservation opportunities for a 400,000-acre area in San Diego County that includes the headwaters of five major watersheds. The study involved development and review of a spatial and non-spatial database for the area, identification of regionally important resources and landscape connections, and a gap analysis to identify regionally important resources that were in private ownership and zoned for development or agriculture. CBI identified and evaluated the potential effects of land uses and other stressors, including those that may affect downstream portions of the watersheds. CBI and a team of scientists conducted biological surveys of selected properties. As a result of the studies, CBI prepared a conservation strategy report that identifies conservation priorities, research needs, land use constraints, potentially compatible land uses and appropriate locations, restoration opportunities, and habitat management goals.

MSCP Monitoring Program Coordination – California Department of Fish and Game (CDFG), U.S. Fish and Wildlife Service (USFWS) and City of San Diego. CBI worked with the City of San Diego and other San Diego County jurisdictions, USFWS, and CDFG to implement the Subregional Biological Monitoring Program for the San Diego MSCP. As part of this effort, CBI compiled an inventory of existing monitoring efforts in western San Diego County, developed a strategic framework of the roles and responsibilities of the monitoring partners, refined biological monitoring protocols, developed structures and protocols for managing large biological databases, formulated a strategy for developing a centralized database repository, and developed a web site to disseminate MSCP-related information to the public.

Regional Biological Monitoring Plan for the Multiple Habitats Conservation Program – San Diego Association of Governments. In coordination with the California Department of Fish and Game and the U.S. Fish and Wildlife Service, and the seven North San Diego County cities participating in the Multiple Habitats Conservation Program (MHCP), CBI developed a regional biological monitoring plan for the MHCP planning area. The MHCP biological monitoring program is intended to provide a systematic data collection effort to gauge the progress and success of the habitat preserve system. The plan addresses regional monitoring objectives and describes specific monitoring approaches for riparian communities, uplands, vernal pools, coastal lagoons, and wildlife movement corridors within the preserve system.

Habitat Management Planning for the Marron Valley Preserve Area – City of San Diego. Dr. White developed a habitat management plan for the 2,600-acre Marron Valley MSCP Preserve Area. He coordinated a team of biologists associated with CBI, the U.S. Geological Survey, and the San Diego Natural History Museum to conduct baseline field surveys and map the distributions of key resources, including vegetation communities, rare plants, endangered Quino checkerspot butterflies, herpetofauna (including the endangered arroyo southwestern toad), and breeding riparian birds (including the endangered least Bell's vireo and southwestern willow flycatcher). Dr. White conducted surveys for the endangered San Diego fairy shrimp in vernal pools on the property. The management plan addressed issues such as cattle grazing, fire management, access,

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fencing, exotic species control, monitoring, and research.

Wildlife Corridor Monitoring Study – City of Poway and City of San Diego. This study evaluated the use of designated wildlife corridors by target mammal species, including mountain lions, bobcats, coyotes, mule deer. Field monitoring was conducted in the Los Peñasquitos, Carmel Valley, Carmel Mountain/Del Mar Mesa, and eastern Poway areas by a graduate student and by a local volunteer organization using different methodologies over several seasons. Dr. White analyzed the data generated to assess the functionality of the wildlife corridors and to compare the methods. CBI's report made recommendations on wildlife corridor monitoring methodologies for the MSCP.

Lower Colorado River Multi-Species Conservation Program – National Fish and Wildlife Foundation. Dr. White served as the Technical Coordinator of the plan development team for the Lower Colorado River Multiple Species Conservation Program (LCR MSCP). The LCR MSCP plan was prepared for a consortium of federal and state agencies (California, Nevada, and Arizona), water and hydropower interests, and Native American Tribal governments. The LCR MSCP was initiated to optimize opportunities for current and future water and power development in the lower Colorado River basin, while working towards conservation of listed and selected unlisted species and their habitats in compliance with both the federal and California Endangered Species Acts. The result of the plan will be the issuance of incidental take authorizations under Sections 7 and 10(a)(1)(B) of the Endangered Species Act, and Section 2835 of the California Natural Communities Conservation Program Act for those species deemed to be adequately addressed by the plan, through a combination of conservation, management, restoration, and operational measures.

Dr. White's responsibilities included providing overall technical oversight for the project team, including development of a conservation strategy for the program and alternatives for evaluation under the California Environmental Quality Act and National Environmental Policy Act. The conservation strategy involved a strong riparian habitat restoration component, which involves integrating the requirements of riparian species with the hydrologic and hydraulic conditions on the river in light of future water management scenarios (e.g., intrastate water transfers to achieve compliance with California's 4.4 Plan, offstream storage and interstate transfer rules). The conservation strategy had to consider large-scale water management activities and water accounting practices dictated by the large body of legislation and court decrees collectively known as the Law of the River.

Multiple Species Conservation Program – City of San Diego Clean Water Program. Dr. White participated in development of a conservation and management plan for federally listed species and key candidate species and their habitats in a 900-square-mile area in San Diego County. He coordinated the development of a GIS-based habitat evaluation model, prepared hydrologic management guidelines for the preserve system, and assisted with development of the species and habitat monitoring program for the preserve system.

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TECHNICAL STUDIES

Fairy Shrimp Survey Protocol Analysis – Western Riverside County Regional Conservation Authority. Dr. White performed an analysis of Endangered Species Act section 10(a)(1)(A) fairy shrimp survey data to assess the adequacy of a single survey, as opposed to multiple surveys, in detecting fairy shrimp in vernal pools. The analysis used the survey data to determine the conditional probability of detecting shrimp in the second survey period if shrimp either were or were not collected in the first survey period.

The Influence of Watershed Urbanization on the Hydrology and Biology of Los Peñasquitos Creek – The San Diego Foundation Blasker Rose-Miah Fund. Dr. White was awarded a research grant to study the effects of urbanization in the Los Peñasquitos Creek watershed. The Los Peñasquitos Creek watershed is a small coastal watershed in San Diego, California that contains significant areas of conserved natural habitats, but has experienced rapid urban growth. The study examined how patterns of land use change in the Los Peñasquitos Creek watershed have affected downstream hydrology of the creek, channel geomorphology, and associated riparian vegetation communities. The research showed that urbanization of the watershed has resulted in significant increases in discharge, annual runoff, flood peaks, and dry-season flows. These hydrologic changes have driven changes in the distribution and composition of riparian habitats associated with Los Peñasquitos Creek.

Source Water Protection Guidelines – The City of San Diego Water Department. Dr. White provided technical assistance to City of San Diego Water Department staff in preparing development guidelines intended to ensure protect of the quality of San Diego source water supply reservoirs. The project was conducted by a consulting firm, Brown and Caldwell, and Dr. White served as a technical advisor directly to the City.

Guajome Lake Water Quality Assessment Project – County of San Diego. Dr. White served as project manager for a water quality study at Guajome Lake in northern San Diego County funded under the U.S. Environmental Protection Agency's (USEPA) Clean Lakes Program. The focus of the project was to characterize water quality in the lake through field sampling and chemical analysis of soil, sediment, stream flow, and lake water to identify pollution problems in the lake and its watershed. The project included preparation of a Quality Assurance Project Plan (QAPP), assessing historic uses of agricultural chemicals in the watershed, estimating sediment and chemical constituent loadings to the lake with watershed modeling techniques, developing and assessing pollution control measures, and developing pollution control and water quality monitoring programs for the lake.

San Diego River Live Stream Discharge Studies – City of San Diego. Dr. White was biology task manager for analysis of potential effects of live stream discharge of reclaimed water to the San Diego River. The objectives of the study were to determine the feasibility of a live stream discharge program in light of the potential effects to wetlands (including habitat for the endangered least Bell's vireo), aquatic fauna, water quality, and public health. Responsibilities included an assessment of the effects of varying quantities of live stream discharge on fisheries habitat, riparian and salt marsh wetlands, wetland-associated terrestrial species, and disease vectors. Completion of this task required interpretation of the QUAL2E water quality model output and hydraulic

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modeling output.

Salton Sea Water Quality Management Project – Salton Sea Authority. As project manager for a program funded under a USEPA Clean Lakes Grant, Dr. White summarized and presented environmental and economic analyses of salinity and surface elevation management alternatives at the Salton Sea. The project entailed interaction with the USEPA, U.S. Army Corps of Engineers, Bureau of Reclamation, U.S. Fish and Wildlife Service, California Department of Fish and Game, Regional Water Quality Control Board, California Environmental Protection Agency, and local citizens groups to identify and summarize their concerns.

Olivenhain Reservoir Limnological Assessment – Olivenhain Water District. Dr. White served as project manager and technical lead for the assessment of anticipated limnological conditions of a reservoir planned for San Diego County (Olivenhain Reservoir). The assessment projected anticipated thermal stratification and dynamics of nutrients, dissolved oxygen, and other water quality constituents. He recommended design features to better manage water quality in the reservoir, including a multi-port outlet tower to allow selective withdrawals, artificial circulation/hypolimnetic aeration, and a separate inlet structure for aqueduct inflows.

Fairy Shrimp Survey and Assessments – Twentynine Palms Marine Corps Air Ground Combat Center. Dr. White directed field surveys of anostracans (primarily fairy shrimp) in desert playas and impact assessments of base operations on these resources. Field surveys involved collecting samples of sediments containing anostracan eggs that were reared in controlled conditions in the laboratory. The impact assessment primarily evaluated the effects of vehicle traffic (e.g., tanks and armored personnel carriers) on desert playa habitats.

Fisheries Survey – Newhall Land and Farming. Dr. White conducted a field survey of native fishes in the Santa Clara River, Los Angeles County, California, as part of an emergency road crossing project. The purpose of the survey was to document the species present in the study area and to relocate fish potentially impacted by construction operations to areas outside of the impact zone as conditioned in the California Department of Fish and Game Streambed Alteration Agreement for the project. Species of particular interest were three-spined stickleback (*Gasterosteus aculeatus*), arroyo chub (*Gila orcutti*), and Santa Ana sucker (*Catostomus santaanae*).

Impacts of Threadfin Shad on Largemouth Bass – San Diego State University. Dr. White participated in a project to examine the impacts of threadfin shad introductions on aquatic biota in Southern California reservoirs. He sampled fish and plankton, conducted physical and chemical analyses, and conducted echo-sounding in six lakes in San Diego County. Dr. White identified zooplankton and provided statistical review.

Impacts of Opossum Shrimp on Zooplankton – Tahoe Research Group. Dr. White participated in a project assessing the impacts of opossum shrimp (*Mysis relicta*) introductions on Lake Tahoe zooplankton. He installed experimental enclosures with scuba, sampled and counted zooplankton, and performed a variety of routine limnological analyses, as well as conducted short-term opossum shrimp feeding experiments.

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*ANALYSIS OF ENVIRONMENTAL IMPACT
AND REGULATORY COMPLIANCE*

Martis Valley Community Plan – Sierra Watch and Mountain Area Protection Foundation. Dr. White conducted a review and provided comments on the Environmental Impact Report prepared for the update to the Martis Valley Community Plan on behalf of Sierra Watch and Mountain Area Protection Foundation. The Community Plan Update proposed alternatives that would change development patterns in the Martis Valley Community Planning Area, Placer County, California. These impacts would have potentially significant impacts to high value terrestrial and aquatic resources, including forests, shrub communities, meadows, and stream systems. To assist with critiquing the biological resources analyses in the EIR, CBI developed a natural resources conservation vision for the Martis Valley and identified how the proposed developments authorized under the proposed Community Plan would adversely affect these resources. Dr. White participated in landowner negotiations over development designs and provided litigation support.

Evaluation of the Cabo San Quintín Development Project and Environmental Impact Study – *pro esteros* and Endangered Habitats League. CBI conducted an evaluation of the proposed Cabo San Quintín development plan and associated Mexican environmental impact study (Manifestación de Impacto Ambiental) for the Punto Mazo peninsula, San Quintín, Baja California, Mexico. The evaluation discussed inadequacies and inconsistencies of the environmental analysis, and presented an independent analysis of key project features and their potential impacts. Key points discussed in the evaluation included the inadequate consideration of Mexican endangered species laws, state land use regulations, potable and irrigation water supply issues, waste water treatment and potential nutrient loading, potential effects of marina dredging on the Bahía San Quintín, potential impacts to endemic species and sensitive habitats, and potential socioeconomic impacts associated with the increased regional infrastructure and services needs that would result from implementing the project.

Wetlands Permitting, Mission Valley West Light Rail Transit – Metropolitan Transit Development Board. Dr. White was the project manager responsible for coordinating wetlands and endangered species permitting for the Mission Valley West Light Rail Transit project. He conducted a Section 404(b)(1) alternatives analysis, selected potential riparian mitigation sites, acted as permitting agency liaison, coordinated development of a wetlands mitigation plan, conducted U.S. Army Corps of Engineers 404 and California Department of Fish and Game Streambed Alteration Agreement permitting, and coordinated Section 7 consultation for the endangered least Bell's vireo.

Wetlands Permitting and Mitigation Plan, East Mission Gorge Sewer Interceptor Force Main and Pump Station – City of San Diego Water Utilities Department. Dr. White coordinated the development of a detailed wetlands mitigation plan for impacts associated with the construction of a sewage pump station and force main. The wetlands mitigation plan was developed in consultation with the U.S. Fish and Wildlife Service, California Department of Fish and Game, and City of San Diego. The mitigation plan was required for the U.S. Army Corps of Engineers' Section 404 and California Department of Fish and Game 1601 permitting process. Dr. White also conducted the biological resources impact analysis for the California Environmental

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Quality Act (CEQA) compliance.

CONSERVATION OUTREACH, TRAINING, AND EDUCATION

San Dieguito River Watershed Information System – San Dieguito River Valley Conservancy. Dr. White directed the development of a Geographic Information System (GIS) based information system that will assist the Conservancy and the San Dieguito River Valley Joint Powers Authority (JPA) with planning, land acquisition and conservation, and community outreach. The project was funded by the San Diego Foundation. The GIS tool combines available regional data layers such as land use, land ownership, biological resources information, topography, water resources information, and political boundaries, into a user-friendly mapping and analysis tool. The tool allows staff at the Conservancy and JPA to combine various data layers for environmental analyses, to track resource and land status in the watershed, and to create maps and displays for outreach purposes.

Conservation Resource Center Feasibility Study – San Dieguito River Valley Conservancy. CBI prepared a study evaluating the feasibility and desirability of establishing a resource support service for conservation groups in San Diego County. The first phase of the study included an exploratory workshop and discussions with individuals from the San Diego conservation community about alternative strategies for sharing resources. CBI conducted research on other organizational models across the country and evaluated the local availability of technical services. We prepared a report summarizing the results of our study and that provided recommendations on a structure and strategy for developing a resource center.

Aquatic Ecology Training Program – Campo Environmental Protection Agency. Dr. White conducted training of tribal members working for the Campo Band of Mission Indians Environmental Protection Agency (Campo EPA) in aquatic and riparian resource ecology, inventory, and restoration. The program was funded under Section 106 of the Clean Water Act. The ultimate goal of the program was to provide tribal members sufficient training to allow for an efficient and effective transition of delegation of authority over water resources matters to the Campo Band. He conducted training in riparian ecology, aquatic invertebrate ecology, Rapid Bioassessment Protocols, and stream and riparian restoration techniques.

ECOLOGICAL RISK ASSESSMENTS

Ecological Risk Assessment, U.S. Naval Activities (NAVACTS), Guam – U.S. Navy. Dr. White coordinated investigations in support of ecological risk assessments for terrestrial and freshwater habitats at four sites at NAVACTS Guam. Field studies included mapping and characterization of vegetation and wildlife habitat, floral and faunal inventories, collection of soils and sediments for toxicity tests and chemical analyses, and analysis of resident biota for contaminant bioaccumulation. This information was compared to data from offsite reference areas. These data were used to develop preliminary ecological risk assessments evaluating the potential risk that the chemicals onsite posed to aquatic and terrestrial communities. Of special concern was the potential for adverse impacts to the endangered Mariana common moorhen, which utilizes freshwater marshes in the area. Chemicals of concern for these sites included metals, pesticides, polychlorinated biphenyls (PCBs), dioxins, petroleum hydrocarbons, and polynuclear

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aromatic hydrocarbons (PAHs).

Ecological Risk Assessment, Old WESTPAC Site, NAVACTS, Guam – U.S. Navy. Dr. White coordinated field studies at NAVACTS, Guam to sample soils and freshwater sediments for chemical analyses and toxicity tests. Collected aquatic and terrestrial organisms for tissue analyses to determine bioaccumulation of chemicals found onsite. These data were used to develop a preliminary ecological risk assessment evaluating the potential risk that the chemicals onsite posed to aquatic and terrestrial communities. Of particular concern were wetlands supporting the endangered Mariana common moorhen. Chemicals of concern included metals, pesticides, PCBs, petroleum hydrocarbons, and PAHs.

Ecological Risk Assessment RCRA Facilities Investigation – Rocketdyne Division, Boeing North American. Dr. White oversaw the development of ecological risk assessments at 36 sites at the 2,500-acre Santa Susana Field Laboratory (SSFL) for the Rocketdyne Division of Boeing North American. He supervised biologists conducting extensive field surveys of the SSFL that involved vegetation community mapping, rare plant surveys, and wildlife species inventories. He coordinated with the California Department of Toxic Substances Control (DTSC) on development of a series of "white papers" describing the approach and methodologies that will ultimately be employed to conduct the risk assessments for the SSFL. The white papers dealt with issues such as determining background concentrations, selecting contaminants of concern, proposed conceptual site models, calculation of exposure point concentrations, development of exposure model parameters, and risk-based decision criteria.

PUBLICATIONS AND PRESENTATIONS

PUBLICATIONS AND REPORTS

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- White, M.D., K. Kauffman, J. Lewis, and R. Miller. 2018. Wild pig use of fenced farm fields in California's San Joaquin Valley. *California Agriculture* 72(2):120-126.
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0175

0175-1

Squaw Valley Alpine Meadows (SVAM) is submitting these comments in order to provide the County and USFS with information that may be useful in responding to concerns regarding the proposed Gazex system, to be installed along with the B2B Gondola.

The Draft EIS/EIR concludes that the Gazex system will not have a significant impact with respect to noise. The Draft EIS/EIR reaches this conclusion because the amount of noise generated by the Gazex system would be indistinguishable from the noise generated by existing 105mm Howitzer avalanche control measure. Thus, the new system will not result in a noticeable increase in noise levels, as compared to existing conditions.

During the Planning Commission's hearing on the Draft EIS/EIR, a number of commenters expressed concern that the Gazex system may generate noise levels that are disturbing to residents in the area. In responding to these comments, SVAM believes it is important to draw a distinction between the existing Gazex system, and the system that is proposed to be installed as part of the B2B. In particular, the responses should reflect the fact that these concerns are focused on the existing Gazex system, not on the Gazex system to be installed along with the B2B Gondola.

To the extent residents have concerns about the existing Gazex system, we will work with the County to address those concerns. We are as interested in the County in minimizing the extent to which residents are disturbed by the Gazex system installed to protect Alpine Meadows Road. We need to ensure, however, that in addressing those concerns, the system provides adequate avalanche protection in a safe and reliable manner. As both the County and USFS recognizes, avalanche protection is a necessity in this area. If that protection is not provided by the Gazex system, it will have to be provided by other means. Residents recognize this fact, as avalanche protection has been a feature of life in this area for decades. Any other approach to avalanche protection involves trade-offs in terms of noise, safety and reliability. In responding to these comments, the County and USFS should acknowledge these trade-offs.

The responses must also differentiate between the impacts of the existing Gazex system and the Gazex system proposed as part of the B2B Gondola. The existing system is in a different location and much closer to residents and Alpine Meadows Road. Indeed, the existing system is designed to provide avalanche protection to these residents and the road. The B2B system, by contrast, is designed to provide avalanche protection to an area that will be traversed by skiers at Alpine Meadows. This location is more distant and at a different elevation than the existing system.

We want to ensure that, in responding to these comments, the Final EIS/EIR:

- (1) Takes care to distinguish between the current/existing use of Gazex and the proposed B2B gondola future use;
- (2) Recognizes that, before SVAM installed the existing Gazex system, SVAM used howitzers and hand charges to provide avalanche control for Alpine Meadows Road and nearby residences;
- (3) Recognizes that adding additional Gazex facilities does not mean that impacts will necessarily be additive, but are instead dependent on the location, elevation and timing of their use;
- (4) Acknowledges that avalanche control for Alpine Meadows Road and nearby residents is a longstanding program undertaken by both SVAM and the County, and that this program will have to continue to be implemented going forward regardless of whether Gazex facilities are approved at the B2B Gondola location; and

0175-1, Other (O2)

The comment provides additional information from the project applicant regarding existing and proposed Gazex avalanche mitigation facilities. A proposed Gazex avalanche mitigation system was included as part of all Gondola action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, and submittal of this comment letter, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Although the Forest Service and County appreciate the additional information provided in this comment letter, it is no longer relevant with removal of the Gazex mitigation system from the action alternatives.

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0175-1 cont'd, Other (O2)

- (5) Acknowledges the trade-offs associated with Gazex versus other forms of avalanche control – particularly the benefits of the Gazex system in terms of flexibility, reliability and public safety.

Based on comments at the Commission hearing, we recognize that some residents find the existing Gazex system to be intrusive. We are very interested in working with these residents and the County to make sure that the Gazex system is as unobtrusive as possible, while still ensuring that the system provides the public safety benefits upon which we all rely. We are working with Gazex's manufacturer and others to better understand and address these concerns.

We are also concerned, however, that the existing Gazex system is becoming bound up with the B2B Gondola proposal. In particular, there seems to be a misapprehension that the existing Gazex system has been put into place solely as a result of the B2B Gondola. That is incorrect. The B2B Gondola does include a proposal to install Gazex facilities on skiable terrain located in the vicinity of the B2B Alpine Meadows mid-station. But this proposal is not tied in any way to the existing Gazex facilities. In order to reduce confusion on this matter, we believe it is essential that the responses make this distinction as clear as possible.

Our objective in seeking greater clarity is to avoid the necessity of an obscure math exercise that treats all Gazex facilities as additive. That is not the way the systems work. Gazex is widely used as a means of avalanche control. It has clear advantages over traditional methods such as hand charges and howitzers. We want to ensure that the County does not over-react to complaints by labelling all Gazex operations as adverse, without regard to their location or use, particularly where as here the system provides significant public benefits. In particular, we want to make sure that the residents' concerns about the existing Gazex system do not result in imposing inappropriate restrictions on the use of Gazex elsewhere at the resort – particularly at the Squaw to Alpine Base-to-Base project.

Background

There is a long history and a current executed agreement in place where Squaw Valley Alpine Meadows (SVAM) provides avalanche control for Placer County for Alpine Meadows Road. SVAM currently has County approval for the installation of 8 Gazex facilities. Four of these facilities are installed and operating. Four additional facilities are under construction and will commence operations in 2019/2020.

The existing system is designed to provide avalanche protection along Alpine Meadows Road and at residences located near this road. The facilities are operated for the exclusive benefit of Alpine Meadows and the public right-of-way and provide no broader resort benefit.

This proven technology is widely used in Europe. It provides the safest and most effective means of avalanche control. In this case for the resort operations team, the system provides avalanche protection for residents living in Alpine Meadows and the public who drive on Alpine Meadows Road.

There is a current agreement in place between the County and Squaw where the County pays the direct costs for SVAM acting as contractor for Placer County to provide this avalanche control to ensure public safety for Alpine Meadows residents and Alpine Meadows Road.

The system provides greater operational flexibility than conventional forms of avalanche control. In particular, the system can be operated at any time avalanche control is needed, whereas conventional forms of avalanche control can be used only when personnel can safely access the area. The

0175

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0175-1 cont'd, Other (O2)

conventional approach means that an avalanche hazard may exist for a period of time, waiting for areas to be safe and/or accessible to personnel. The Gazex system eliminates this risk. In addition, the system does not present a hazard to those operating the system, whereas the use of conventional explosives presents an unavoidable risk to those handling the explosives.

Treating All Gazex Installations Equally

Comments suggest that there is confusion regarding the relationship between the existing Gazex system, and the system proposed to be installed as part of the B2B Gondola. Although the technology is the same, the facilities are separate, and serve different purposes.

The existing system provides avalanche protection for Alpine Meadows Road and adjacent residences. The system has been operated for some time, and will continue to be operated. That will occur regardless of whether the County approves the Gazex system for the B2B Gondola.

The B2B Gondola Gazex system serves terrain that is accessed by skiers at Alpine Meadows. SVAM currently provides avalanche control in this area with howitzers and hand charges. The Gazex system will supplant these conventional avalanche control techniques. If the County does not approve the Gazex system, then SVAM will continue to use conventional techniques for avalanche control in this area. Whether and how avalanche control is provided in this area is unrelated to the existing Gazex system. They serve different purposes.

The County's responses to public concerns should make clear that the systems are in different locations, and provide avalanche control for different areas. Responses should identify the distance between these two areas, in terms of lateral and vertical distance, and should note any intervening topography. That is particularly important because distance and sight lines have a bearing on the extent to which impacts are "additive."

Public Confusion

Public comments at the Planning Commission Hearing on May 24, 2018 were a clear indication that the public was confused. One person asked: "How could the 4 Gazex facilities already in operation have been approved ahead of the B2B project approval?" The County should make clear that the existing system was installed to replace existing avalanche control along Alpine Meadows Road, and note that this system was not installed as part of the B2B Gondola proposal.

Public Safety Risk Mitigation By Separate County Agreement

The current agreement between SVAM and Placer County on avalanche control for Alpine Meadows Road should be described, and distinguished from B2B Gazex avalanche control. SVAM performs as a contractor for Placer County to provide avalanche control for Alpine Meadows Road and the public right-of-way, along with residents located along this right-of-way. This operation is completely independent from the B2B project. The use of these facilities operates solely for the protection of Alpine Meadows Road and surrounding public right-of-way based on the snow conditions in this area. Whether to continue this operation, or to go back to conventional avalanche control techniques, is an issue that should be addressed without regard to the B2B Gondola proposal. In our view, such a decision would significantly increase public safety risk. The essential point, however, is that this decision should not be bound up with the County's decision on the B2B Gondola.

0175-1 cont'd, Other (O2)

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While we understand the County has an obligation to address cumulative impacts, we are skeptical about claims that the B2B Gondola Gazex system will result in cumulative impacts when considered in combination with the existing Gazex system. It may not be accurate to assume that, simply because a Gazex system will be installed in a similar location, the impacts will be additive. The systems will be separated by distance and topography, and may be operated at different times, and in different ways. The need for avalanche control in one area may not coincide with the need for avalanche control in the other. Avalanche control is already being performed in both areas, and that will continue, regardless of the decisions the County makes about the B2B Gondola. We understand why commenters may assume that more Gazex facilities translate into more noise. This assumption is overly simplistic.

We are therefore concerned that any attempt to estimate the cumulative effect of both systems does not rely on arcane models that have little bearing on reality, and only serve to provide a false sense of scientific certainty. In fact, whether and how each system is operated will be determined by conditions at each location. Given the vagaries of mother nature, and the different avalanche control concerns at each location, the variables are endless. That is particularly true where, as here, the issue is not avalanche control versus no avalanche control. Rather, the issue is Gazex versus conventional control. We are not sure whether an exploration of these innumerable variables will provide meaningful information.

Weighing the public benefit

We should not lose sight that these facilities save lives. Even those few who are objecting would likely prefer to be awakened at night if it means reducing the risks associated with an avalanche that isn't triggered until morning. It would be unfortunate to treat these life-saving facilities as creating adverse impacts. If this simple evaluation assumes 16 facilities are more adverse than 8, we do not think it would be responsible to discontinue the Alpine Meadows Road avalanche control facilities and put the public safety at greater risk. However, we believe it is equally inappropriate to assign impacts of 16 Gazex facilities operating simultaneously in proximity to one another (cumulative) to the B2B Gondola.

We are not indifferent to the comments we heard from residents on May 24. If there are ways we can operate the existing Gazex system, so that it is less disturbing to commenters, we are open to working with the County to explore them. We want to make sure that, in any event, we continue our collaboration with the County to provide avalanche control to those traveling on the Alpine Meadows Road public right of way, along with nearby residents. We also want to provide this control in a manner that minimizes risks to our own personnel, and that is both reliable and flexible.

We are also open to suggestions regarding how the Gazex system proposed as part of the B2B Gondola might be operated to minimize disturbance on residents. Given that avalanche control in this area is aimed at protecting skiers, there may be more flexibility in terms of hours of operation than at the existing Gazex system (which protects a public right-of-way and residences).

We appreciate the opportunity to provide these comments.

0176

**Squaw Valley Lodge Owners Association
201 Squaw Peak Road
Post Office Box 2364
Olympic Valley, California 96146**

0176-1, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

June 5, 2018

Placer County Community Development Resources Agency
3091 County Center Drive, Suite 190
Auburn, California 95603
Attention: Shirlee Herrington, Environmental Coordination Services

cdraecs@placer.ca.gov

Subject: SVLOA Comments on Squaw Valley/Alpine Meadows Base-to-Base Gondola
Project Draft EIS/EIR (State Clearinghouse No. 2016042066)

Dear Ms. Herrington:

Thank you for the opportunity to comment on the Draft EIS/EIR for the Squaw Valley/Alpine Meadows Base-to-Base Gondola Project. This letter is submitted on behalf of the Squaw Valley Lodge Owners Association.

0176-1

The Squaw Valley Lodge (SVL) is 218 unit condominium lodge which is adjacent to the proposed Squaw Valley base terminal in Alternatives #2 and #3 of the Base to Base Gondola. More than 60 units have views to the South and the proposed terminal location area. The closest units are in the range of 60+/- feet from the proposed terminal deck and loading areas. While the SVL HOA supports the concept of an interconnecting gondola as proposed in Alternative #4, the direct proximity of the SVL to the Squaw Valley terminal, as proposed in Alternatives #2 and #3, raise impact concerns for the SVL homeowners and the public at large, which are addressed here.

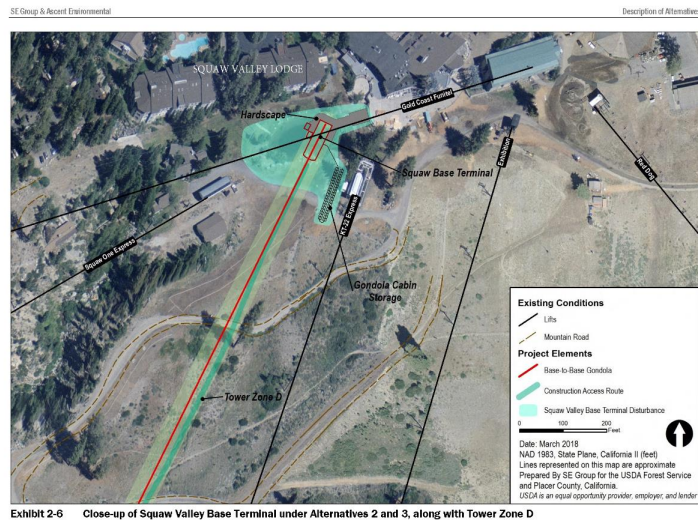
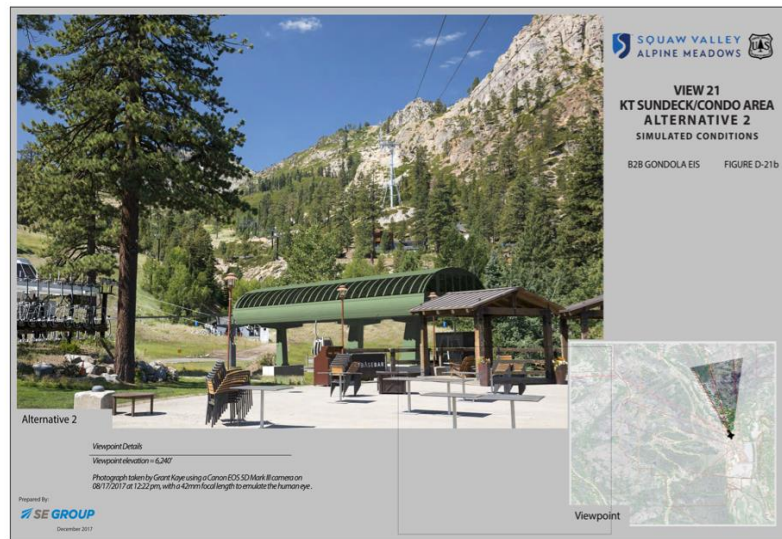


Exhibit 2-6 Close-up of Squaw Valley Base Terminal under Alternatives 2 and 3, along with Tower Zone D

U.S. Forest Service and Placer County
Squaw Valley | Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR

2-9



0176

PLAN VIEW/AESTHETIC IMPACTS

- 0176-2 • The plan view is very small scale and approximate. That makes it hard for the public to adequately assess the impact of this structure and its effect on the visual character of the site and its surroundings. A scaled plan showing size and relationship to adjacent residential/guest structures and property lines should be included.
- 0176-3 • Alternatives 2 and 3 would result in direct loss (through permanent fill) of 0.25 acre of Cushing Pond. Cushing Pond is a primary visual feature of the site, and enhances the aesthetics of the surrounding area. The removal of a quarter acre of the pond has the potential for significant aesthetic impacts that have not been evaluated or mitigated. The extent and design treatment of Cushing Pond fill and enlargement (in the case of Alternate #2) should be illustrated and included. "Disturbed area" gives little indication, beyond general location, to the public what the proposed terminal/pond implementation will be.
- 0176-4 • "Hardscape" should be defined and illustrated, as the grades in the area are significantly different at the KT deck and the gondola terminal location. As previously explained and illustrated in the visualization, the level access from KT deck will block skier access from the KT area for the ski-in/ski out residents and guests of much of the SVL. Night skiing won't work, as it does now if the hardscape is a barrier to skiing. Summer access of the area could be greatly complicated. Hardscape and terminal access details need to be illustrated now and not deferred to a design review process so that the public can assess and comment on potential impacts of and mitigation measures for the proposal.
- 0176-5 • The proposed enclosed gondola storage structures are a significant element that isn't illustrated in the plans and visual simulation of the Squaw Valley base terminals. Plan views and visual simulations and assessment of gondola storage structures need to be added as it will impact the visual and access elements that are being considered.
- 0176-6 • The operational sheds of the terminal should be located on the south side of the SV terminal (Alternates #2 & #3) to allow more space for potential screening and light and noise mitigation.
- 0176-7 • Landscape screening and softening of the terminal at SV resort might be most effective if plants commonly used in the surrounding area at SV Resort are used for these efforts. Strict use of native plants should not apply at the resort terminal. Landscape planting for screening and softening should be illustrated at the resort terminals in order for the public and SVL homeowners to assess the impact of new large structures in very close proximity to existing lodge buildings.

0176-2, Visual Resources (VR)

The plan view shown in the Draft EIS/EIR does show scale and represents the relationship between proposed infrastructure and adjacent structures. In addition, the visual simulations were created to give the public a better idea of what proposed infrastructure may look like from selected sensitive viewpoints. Please refer to View 21 for Alternative 2 (within Appendix D of the EIS/EIR) for a close-up view of what the Squaw Valley base terminal may look like near the Squaw Valley Lodge.

0176-3, Visual Resources (VR)

The Final EIS/EIR has been updated to include narrative discussion of impacts that may occur to Cushing Pond as a result of Alternatives 2 and 3. Please refer to page 4.2-28 under Impact 4.2-2: Visual Character in the Final EIS/EIR for further information.

0176-4, Visual Resources (VR)

For Alternatives 2 and 3, the Squaw Valley base terminal would be positioned at the east end of Cushing Pond. The terminal would be raised above the ground so that the loading platform elevation would be at approximately the same elevation as the KT Deck. The elevation of the KT Deck is 6,228 feet, and the elevation at the proposed location of the Squaw Valley base terminal ranges from 6,219 to 6,220 feet. Accordingly, the gondola loading platform would be 8 to 10 feet above the existing ground elevation in the area, and about 5-6 feet above the average snow level during winter.

There would be an elevated bridge connecting the KT Deck with the gondola loading platform; the bridge would be approximately 75 feet long and 30 feet wide. The bridge would range from 6-10 feet above the existing ground level and 3-6 feet above the average snow level during winter.

Detailed design of the gondola platform and hardscape has not yet been completed, but construction techniques would likely involve earthen embankment, steel and/or reinforced concrete structural elements and either brick paver or steel gate bridge/platform surface.

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0176-5, Visual Resources (VR)

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be simulated for the purposes of this EIS/EIR. Highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

Also please note that in accordance with RPM SCE-1, the cabin storage structure would be subject to agency design review and approval.

0176-6, Visual Resources (VR)

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This comment will be considered in the development of base station design plans, pending project approval. Also, the cabin storage structure would be subject to the agency design review and approval process, in accordance with RPM SCE-1.

0176-7, Visual Resources (VR)

The specific plan of the Squaw Valley base terminal and cabin storage structure, including how vegetation may be applied to screen and/or soften the appearance of the base terminal, would be screened for compliance with both the Visual Management System (VMS) and Built Environment Image Guide (BEIG) prior to project implementation. These documents provide specific direction on how proposed infrastructure must be designed and constructed in a way that minimizes visual impact on the characteristic landscape. Please refer to Sections 4.2.1.2 and 4.2.2.1 of the Final EIS/EIR for detailed information on the BEIG and VMS, respectively.

Also, similar to responses 0176-5 and 0176-6 above, it is important to note that all proposed infrastructure would be subject to the design review and approval process prior to project implementation, in accordance with RPM SCE-1.

OPERATING SCHEDULE

"To perform maintenance, some cabins would need to be put on the line for limited periods during the summer (fewer than 10 times during the summer for running all cars on the line, and 3-5 days per month for limited numbers of cars moved across the line)."

0176-8

- Night time operation was also mentioned at several SVSH community outreach meetings. The EIS/EIR suggests a 6:00 pm closure time during typical use. (Draft EIS/EIR p. 2-14.) Operational hours should be specified beyond "typical use". Night operation would add significant additional noise and light impact to SVL owners and guests. Impacts of proposed night use, beyond "typical" operations should be examined in detail, and to mitigate impacts associated with noise during sensitive nighttime hours a measure limiting night use should be included.
- Summer operation will add significant visual and noise impacts. It would seem this could allow for weekend use thru-out the summer for "maintenance". During summer "maintenance" use, would passengers be allowed? Impacts of allowed summer schedule and hours of maintenance operation should be examined and defined in the EIS/EIR, and summer use should be conditioned on "maintenance only" use (i.e. no passengers/customers other than maintenance personnel).

NOISE

0176-9

- The close proximity of the gondola to sensitive receptors will increase noise impacts both on an intermittent and continuous basis for SVL owners and guests and adjacent residents and guests. Early morning start up, potential night operation and very close loading areas add up to significant additional noise impact. Direct drive systems, enclosed soundproofed motors, etc. could mitigate sound. Sound mitigation elements and technology should be included in terminal locations adjacent to residential/lodging structures.

CIRCULATION & ACCESS

0176-10

- Skier traffic is currently intersecting from many different directions at the proposed location of the Gondola Squaw Valley base station. There are skiers coming down Mountain Run heading east, coming down KT22 headed north and leaving the Village headed west all with different destinations. Adding the Gondola base station into this mix will worsen an already hazardous situation.

0176-8, Project Description (PD)

With the exception of maintenance needs, nighttime operation of the gondola is not proposed.

Night lighting and glare are analyzed in detail in the Draft EIS/EIR. Please refer to Impact 4.2-3 for all alternatives (analysis for Alternative 2 begins on page 4.2-31 of the Draft EIS/EIR). In particular, Impact 4.2-3 (Alt. 2) states: "lights would be used only for maintenance and to prepare for daily operations" and "Occasions when installed night lighting fixtures would be visible during nighttime hours would be very uncommon."

During the summer, the gondola would be in operation exclusively for maintenance purposes, and passengers would not be allowed. Please refer to pages 2-13 and 2-14 of the Draft EIS/EIR for further information.

0176-9, Noise (N)

The comment suggests that the new terminal station could result in significant noise impacts to guests and residents at Squaw Valley Lodge and that mitigation should be included to reduce impacts.

The noise sources and anticipated noise levels associated with the proposed base-terminal at Squaw Valley are discussed in detail on page 4.9-22 of the Draft EIS/EIR. As discussed in the Draft EIS/EIR, the drive units would be enclosed, as suggested by the comment. The gondola also would not operate at night, as suggested by the comment. As discussed on page 4.9-22, the new terminal station would not result in a substantial increase in noise relative to existing conditions where lift infrastructure and skier activity is already present. The proposed gondola would not operate during the sensitive times of the day or all year round. Therefore, the Draft EIS/EIR concludes that the Squaw Valley base-terminal would not result in significant noise impacts to nearby receptors.

0176-10, Recreation (R1)

The Squaw Valley base terminal under Alternatives 2 and 3 would be positioned within the area of Cushing Pond and would be largely outside of the existing ski run area in the vicinity of KT22 Chair, Squaw One Chair and the Tram, where

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most of this skier traffic originates. Additionally, the Squaw Valley base terminal under Alternatives 2 and 3 would be elevated above the ground to allow skiers to pass underneath the lift to transfer from west to east or east to west, as they do now. For this reason, it is not expected that Alternative 2 or 3 would worsen skier traffic or create a hazardous public safety issue in the vicinity of the Squaw Valley base terminal.

- 0176-11 | • SVL owners and guests enjoy and depend on ski-in and ski-out proximity to the slopes at SV. This will be compromised by blocking that most frequently used access.
- 0176-12 | • The most-used access is the area between the KT deck and Cushing Pond. This is the area slated for the “hardscape” connection to the Terminal planned for Alternates #2 and #3. The hardscape would cross and potentially block skier and pedestrian access.
- 0176-13 | • Skiers arriving at SV to get on the Gondola would be coming through SVL property or coming around the corner from Le Chamois heading right into skier traffic. This also worsens an already busy intersection at the end of SVL Building #3 with a great potential for accidents.
- 0176-14 | • Emergency egress should be examined as the current configuration of this area allows for vehicle access from the SVL property.
- 0176-15 | • Pedestrian and Skier access, including visitor parking should be analyzed and addressed in detail at the SV Terminal location, along Squaw Peak Road and at the intersection of Squaw Peak Road and Squaw Valley Road

LIGHTING

“Lighting would be required at the terminals and operating buildings to allow for maintenance outside of normal operating hours and to prepare for daily operations.”

- 0176-16 | • The terminal operating shacks should be located on the south side at the SV terminal to minimize visual impacts to adjacent residents associated with light pollution.
- 0176-17 | • Lighting will more than likely be required throughout the night for safety, janitorial and security. Such lighting should be limited to safety and security requirements, designed using Illuminating Engineering Society’s design guidelines, and in compliance with International DarkSky Association approved fixtures. The impacts on adjacent property owners should be examined and appropriate mitigation such as screening/shielding, low light placement directed downward and away from nearby residents, a limit on maximum wattage, and a limit on the number of allowed nighttime lights should be incorporated.
- 0176-18 | • Lighting hours of use should be regulated in recognition of adjacent residents.

0176-11, Recreation (R1)

Ski-in and ski-out access to and from Squaw Valley Lodge could be affected by Alternatives 2 and 3. The proposed elevated bridge connecting the KT Deck at the Olympic House with the Squaw Valley base terminal loading platform could block the most frequently used snow access route from Squaw Valley Lodge to KT22 and other lifts at the base of the ski area. The loss of this important snow access route would be mitigated by the creation of a new snow access route to the west of the base terminal, but this new route would be approximately 200 feet longer than the current route.

0176-12, Recreation (R1)

Pedestrian access over the hardscape would be maintained in full.

Skier access to the Squaw Valley Lodge between the KT Deck and Cushing Pond would be minorly affected by Alternative 2 through the addition of the hardscape, but access would not be blocked. Skiers would be required to walk approximately 30 additional feet to cross the hardscape before putting on or after removing their skis (depending on whether skiers are heading to the hill or leaving it), but access would not be blocked. Furthermore, true ski-in and ski-out access to the Squaw Valley Lodge would remain on the opposite (west) side of the base terminal.

0176-13, Recreation (R1)

Skiers already arrive to this area to access the Squaw One Express, KT-22 Express, and/or the Gold Coast Funitel. As the gondola project is estimated to cause a 1.4% increase in visitation at Squaw Valley and Alpine Meadows (please refer to Appendix C -Final Visitation and Use Assessment in the Draft EIS/EIR), traffic in this area would not be significantly increased.

0176-14, Public Safety (PS)

It is not expected that emergency egress would be adversely affected by the project.

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The comment lacks sufficient detail, so no further response is warranted.

0176-15, Recreation (R1)

Section 4.7, "Transportation and Circulation" in the Draft EIS/EIR analyzes project impacts related to parking, Squaw Peak Road, and at the Squaw Valley Road/Squaw Peak Road intersection under all time periods and scenarios. Impacts were found not to be significant, and therefore, no mitigation was required.

Pedestrian access over the hardscape would be maintained in full.

Skier access to the Squaw Valley Lodge between the KT Deck and Cushing Pond would be minorly affected by Alternative 2 through the addition of the hardscape, but access would not be blocked. Skiers would be required to walk approximately 30 additional feet to cross the hardscape before putting on or after removing their skis (depending on whether skiers are heading to the hill or leaving it), but access would not be blocked. Furthermore, true ski-in and ski-out access to the Squaw Valley Lodge would remain on the opposite (west) side of the base terminal.

0176-16, Visual Resources (VR)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0176-17, Visual Resources (VR)

With the exception of maintenance needs, nighttime operation of the gondola is not proposed.

Night lighting and glare are analyzed in detail in the Draft EIS/EIR. Please refer to Impact 4.2-3 for all alternatives (analysis for Alternative 2 begins on page 4.2-31 of the Draft EIS/EIR). In particular, Impact 4.2-3 (Alt. 2) states: "lights would be used only for maintenance and to prepare for daily

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operations" and "Occasions when installed night lighting fixtures would be visible during nighttime hours would be very uncommon."

With respect to the mitigation requested by the commenter, RPM SCE-8 states that, "... Building lighting shall be shielded and directed downward such that the bulb or ballast is not visible..." For further information, please refer to the full text provided for RPM SCE-8 in Appendix B of the Draft EIS/EIR. Building lighting will also be subject to Placer County lighting standards and the design review and approval process by the Forest Service.

0176-18, Visual Resources (VR)

Lighting hours of use have been disclosed in the Draft EIS/EIR. In particular, page 4.2-31 of the Draft EIS/EIR states that, "The gondola would typically operate each day during the snow sports season from just before Alpine Meadows and Squaw Valley open until soon after closing (approximately 8:00 a.m. to 6:00 p.m.), so lighting fixtures would be activated only during a short period after sunset." Please refer to Impact 4.2-3 (Alts. 2 and 3) in the Draft EIS/EIR for further information.

0176**CUSHING POND**

- 0176-19 | • Drainage and flooding are significant issues with the SVL as it had a very significant flood and debris flow event in 1996/97. Alterations to Cushing Pond would have uphill drainage impacts, impacting not just Cushing Pond but also Squaw Creek. Alterations and especially reductions in capacity for storm water storage at Cushing Pond should be illustrated, defined and calculated as part of the initial design and mitigation elements.
- 0176-20 | • Cushing pond is a highly cherished feature of the base of Squaw Valley which provides scenic views, a buffer for SVL owners from many resort activities as well as a place of relaxation and social engagement. The peaceful setting and, views, and overall visual character of the site would be negatively impacted by the location and buildout of the SV terminal and gondola storage under alternatives #2 and #3.
- 0176-21 | • Cushing Pond (circa 1950) pictured below: It appears that the pond was part of the Squaw Creek South and modified to form a pond for the initial SV Resort development. Contrary to representations in the EIS/EIR, Cushing Pond is rarely, if ever, drained for repairs. There is constant evidence of tree frogs at Cushing Pond. Cushing pond should be retained in its current location and size for all the benefits it provides for guest of the SV Resort and adjacent property owners.

**0176-19, Hydrology and Water Quality (H&WQ)**

This comment addresses concerns regarding drainage capacity and attendant impacts associated with high stormwater flows. Effects of flooding from implementation of the project are addressed in Impact 4.17-5 of the Draft EIS/EIR. The impact identifies that, "RPMs WQ-9 and WQ-10 require that a Registered Civil Engineer conduct a stormwater drainage study for both Squaw Valley and Alpine Meadows, and the site proposed for development in the implementation plans, to determine whether the development would produce runoff that would exceed the capacity of existing stormwater infrastructure, cause localized ponding, or increase the potential for property damage from flooding. The report would identify water quality protection features and methods to be used during and after construction, as well as identify how stormwater runoff would be reduced to pre-project conditions. The Forest Service would adhere to standards equally stringent to or more stringent than Placer County RPMs WQ-9 and WQ-10." This report would be completed prior to final project approval and project implementation. The approach taken to address drainage and water quality must meet established County standards and requires that stormwater run-off shall be reduced to pre-project conditions. This approach provides success criteria against which the effectiveness of the mitigation will be judged, and the process and mechanisms to achieve that success criteria.

0176-20, Visual Resources (VR)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0176-21, Project Description (PD)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

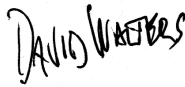
"The human made ponds that would be indirectly affected by Alternative 2 such as Cushing Pond and the snowmaking pond near the Alpine Meadows Base Terminal do not meet the definition of this PCE since they do not hold/maintain water during the entire tadpole growth phase (a minimum of 2 years). These ponds are drained yearly for repairs, and the water within the snowmaking pond at Alpine Meadows is used in the winter months to produce snow."

CONCLUSION:

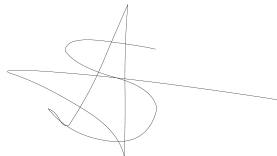
- 0176-22 | • The SVL opposes Alternatives 1, 2 & 3 but strongly supports Alternative 4. While impacts to the existing visual character are significant and unavoidable under Alternatives 2, 3 and 4, such impacts are substantially lessened under Alternative 4.

Thank you for the opportunity to comment on this document. If you would like to contact us please reach out to our Property Manager, Evan Benjaminson, at 530-214-3375 or evanb@gpeak.com.

Sincerely,



David Walters, President
Squaw Valley Lodge Owners Association



Steven Arns, B2B Committee Chair
Squaw Valley Lodge Owners Association

0176-22, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.



**Pacific Crest Trail
Association**

Northern Sierra Regional Office

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June 7, 2018

U.S. Forest Service, Tahoe National Forest, Truckee Ranger District
c/o NEPA Contractor
P.O. Box 2729
Frisco, CO 80443

Placer County Community Development Resources Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603
Attention: Shirlee Herrington, Environmental Coordination Services

*This letter submitted online at Comments@squawalpinegondola-eis.com and
cdraecs@placer.ca.gov*

**RE: Public Comments for Squaw Valley/ Alpine Meadows Base-to-Base Gondola Project,
Draft Environmental Impact Statement/Environmental Impact Report, Tahoe National
Forest**

Dear Review Officer(s),

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's primary private partner in the management, maintenance and protection of the Pacific Crest National Scenic Trail (PCT). As such, it is PCTA's role to advocate for the best possible protection of the PCT and the experience it offers to hikers and equestrians. The PCTA has a solid partnership with the Tahoe National Forest in the management and maintenance of the PCT.

PCTA appreciates and acknowledges the need for the Tahoe National Forest to provide multiple uses across the forest and public lands and supports such management. We support the provision of a variety of opportunities for developed and dispersed recreation experiences throughout public lands.

PCTA has reviewed the Draft EIS/EIR and has a clear understanding of the purpose and need of the proposed Squaw Valley/ Alpine Meadows Base-to-Base Gondola Project. PCTA was pleased to see the PCT included and addressed throughout the Draft EIS/EIR.

First and foremost, the Squaw Valley/ Alpine Meadows Base-to-Base Gondola project does not appear to serve the general population. Mainly benefitting are the project proponents and visitors at Squaw Valley and Alpine Meadows. It is difficult to recognize how this will be a benefit for the many versus a benefit for the few. It is imperative to ask the question, does this really benefit the general public? Does impacting a congressionally designated trail and congressionally designated wilderness warrant the benefits? Please consider these items

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*Celebrating 50 years of the PCT
as a National Scenic Trail.*



0179-1, Purpose and Need (P&N)

The goal of the Draft EIS/EIR is to provide the decisionmaker with the best available data and analysis related to potential impacts that the project may have on individual resources; with that information, the decisionmaker determines whether or not the project, with all of its impacts (both beneficial and adverse), would meet the project's identified purpose and need.

Please refer to the Draft Record of Decision for this project, which provides the decisionmaker's detailed rationale on how the project would or would not meet the project's identified Forest Service purpose and need. Placer County's decision on how the project would or would not meet the project's identified CEQA project objectives will be made by the Placer County Board of Supervisors.

0179-1

0179-1 cont'd	throughout the analysis of the project, for the impacts associated with the project are of great magnitude and are long-term.
0179-2	After reviewing the Alternatives identified in the Draft EIS/EIR, PCTA would prefer to see Alternative 1 (No Action) implemented above all other Alternatives. The project itself will have long-term visual impacts and a negative effect on the trail experience due to the proximity of the project. The project also threatens the protection and overall wilderness character of the Granite Chief Wilderness (GCW), which is an integral part of the PCT experience. The PCT is a congressionally designated National Scenic Trail that people from all over the country and the world come to hike and horseback ride on. The experience on the PCT is paramount and the intent of the trail is "...to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails pass." (National Trails System Act, Sec. 3.b)
0179-3	Regarding the preferred Alternative, Alternative 2, which is favored by the proponent of the project, PCTA <i>strongly urges the Tahoe National Forest to disregard Alternative 2 as an option</i> and implement either Alternative 3 or Alternative 4, or a combination of the two. PCTA opposes the preferred Alternative 2 due to the following items: "The central portion of the Alternative 2 alignment is located just east of the GCW and would cross private lands within the Congressionally-Mapped GCW. This close proximity to the GCW would result in adverse impacts related to visual resources, noise, and wilderness. This middle segment would traverse a distance of approximately 3,000 feet along or near the ridgeline between the two resorts, and therefore has the greatest effect on visual character among the three action alternatives. Due to the close proximity of Alternative 2 to the GCW, this alternative would have the greatest noise effect on the GCW during project construction." (DEIS/EIR e-page 26, page es 1) The National Trails System Act states that "Other uses along the trail, which would not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established." (Sec. 7.c) Alternative 2 <i>does substantially interfere</i> with the nature and purposes of the trail and would not comply with the National Trail System Act. "Alternative 2 would result in adverse effects on visual character because its gondola alignment would traverse the ridgeline separating the National Forest System-GCW and the Caldwell property. The viewpoint analysis indicates that gondola infrastructure would be particularly evident high along this ridgeline..." (DEIS/EIR e-page 92, page 2-37) The DEIS/EIR also states that "...the project could be visible from a section of trail [PCT] approximately 2.5 miles north, near the Granite Chief lift at Squaw Valley, but vegetation would likely screen this view. The project could also be visible from the PCT near the Five Lakes and Alpine Meadows..." (e-page 129, page 4.1-12) A significant visual impact seen from the trail, especially in wilderness, <i>does substantially interfere</i> with the nature and purposes of the trail. Listed above are three (3) identified locations in Alternative 2 where the project would have a visual impact from the PCT. In addition, impacts on the GCW wilderness and its character would be reduced if Alternative 3 or 4 were implemented.
0179-4	

0179-1 cont'd, Purpose and Need (P&N)

0179-2, Alternatives (A)

Impacts that could occur to recreation (including trail experience on the PCT), visual resources, and the Granite Chief Wilderness are analyzed in detail in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness," respectively. Please refer to those sections for specific discussion of how potential resource impacts may affect the PCT.

0179-3, Alternatives (A)

Please note that Alternative 2 is referred to as the Proposed Action Alternative, as identified in the Executive Summary and in Section 1.4 of the Final EIS/EIR. Alternative 2 is not the "preferred Alternative," as stated by the commenter.

Adverse impacts that would occur to the PCT are acknowledged and discussed on pages 4.1-10 through 4.1-12 of the Draft EIS/EIR, but these adverse impacts would be minor.

In particular, pages 4.1-11 and 4.1-12 state the following: "The PCT is approximately 0.5 mile from the gondola alignment associated with Alternative 2 at its closest point. Short-term direct impacts to the trail experience during construction are not anticipated because the trail is separated from the project site by topography and vegetation, which would screen noise and visual impacts. Long-term visual impacts on the trail would be negligible; the project could be visible from a section of trail approximately 2.5 miles north, near the Granite Chief lift at Squaw Valley, but vegetation would likely screen this view. The project could also be visible from the PCT near the Five Lakes and Alpine Meadows, but in areas where vegetation would likely screen the view. The PCT would not be closed at any point during the construction phase."

Topography and/or vegetation would likely screen visibility of the gondola from the few locations along the PCT where visibility is possible. Potential adverse impacts to the PCT would not constitute a substantial interference with the nature and purposes of the PCT, and therefore, Alternative 2 would not be inconsistent with the National Trails System Act.

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0179-4, Visual Resources (VR)

The comment does not provide specific reasons specifying why the Draft EIS/EIR is inadequate. Therefore, a response cannot be provided.

Visual and experiential impacts that would occur to the PCT are described in Sections 4.1, "Recreation" and 4.3, "Wilderness."

0179-5

“Alternative 2 would adversely affect the dispersed recreation experience on nearby trails and wilderness areas, including the Five Lakes Trail, the PCT, and the National Forest System-GCW.” (DEIS/EIR e-page 127, page 4.1-10) In addition, “Alternative 2 has adverse effects on opportunities for Solitude or Primitive and Unconfined recreation.” (DEIS/EIR Table 2-3, Impact 4.3-4, e-page 87, page 2-32) Implementing Alternative 3 or 4 would significantly enhance the opportunities for solitude or primitive and unconfined recreation. This trail segment of the PCT and the GCW falls under the *Primitive* class of the Recreation Opportunity Spectrum (ROS). This area is managed to “...provide users with a primitive recreation experience. These [trail] segments are set in an essentially unmodified environment. Evidence of humans would be unnoticed by an observer wandering through the area.” (Forest Service PCT Comprehensive Plan, Ch. 5, Sec. a) Alternative 2 is in direct conflict with this ROS class and there is a greater potential for degradation of the recreational objectives.

0179-6

PCTA supports Alternative 3 and Alternative 4 over the proposed Alternative 2. Amongst Alternative 3 and 4, PCTA *favours Alternative 3* for the following reasons:

“...Alternative 3 would locate the Squaw Valley mid-station closer to the GCW than Alternative 4, the mid-station under Alternative 4 would be on a peak and would therefore be more visible to the surrounding area than the Alternative 3 mid-station location. As such, Alternative 3 has slightly less effect on visual character compared with Alternative 4.” (DEIS/EIR e-page 27, page es 10) The location of the mid-station is a crucial aspect of the visual impacts involved with the project. Having structures on peaks and along horizons cause significant impacts to the viewshed and have the tendency to dominate the landscape. In addition, anything that is moving attracts the attention of the recreational user, instead of the natural landscape.

“Impacts to dispersed recreation would be more substantial as a result of the alignment associated with Alternative 2, as users would pass beneath the gondola line far along the Five Lakes Trail, in an area where the recreational experience is already very remote; with implementation of Alternative 3 or 4, users would pass beneath the gondola line earlier in their hike, in proximity to existing development and infrastructure, meaning that the new infrastructure associated with Alternative 3 or 4 would represent less of a contrast with the existing landscape than the infrastructure associated with Alternative 2.” (DEIS/EIR e-page 128, page 4.1-11) Implementing Alternative 3 would have less of a negative effect on the visitor utilizing the 5 Lakes Trail for access to the PCT or GCW.

Included in the Draft EIS/EIR is a statement addressing the distance of Alternative 4 from that of the PCT. (DEIS/EIR e-page 27, page es 10) It is true that Alternative 4 would be the most distant from the PCT, though the overall difference between Alternative 3 and Alternative 4 is negligible. It is not a great enough distance to where the visual impacts of Alternative 4 would be drastically reduced. Therefore, PCTA *favours Alternative 3* due to its alignment with the topography and land itself. This alignment would have the least visual impact from the PCT and overrides the greater distance from the PCT in Alternative 4.

The following are the Resource Protection Measures (RPM) detailed in the Draft EIS/EIR which PCTA supports and would take issue if they were removed from the project:

0179-7

0179-5, Recreation (R1)

The Final EIS/EIR discusses consistency with relevant Land Use Plans for Alternative 2 in Section 4.1-3. Alternative 2 would include amendments to the Alpine Meadows SUP area, but would be consistent with all relevant Forest Service ROS classifications as well as County and other local plans applicable to private lands. This includes the ROS classification of Primitive, which is applicable for the National Forest System-GCW and the portions of the PCT contained within the National Forest System-GCW.

More specifically, while some gondola infrastructure would likely be evident from within the National Forest System-GCW, Alternative 2 would not represent an inconsistency with this ROS classification. This is because Alternative 2 would cause no modification of the natural environment of the National Forest System-GCW; interactions between users of the National Forest System-GCW would remain very low; and the National Forest System-GCW would remain essentially free from human-induced restrictions and controls (as well as evidence of these restrictions and controls). For further discussion in the Final EIS/EIR, please refer to Section 4.1.1.2, which defines the ROS classification of Primitive, and Impact 4.1-3 (Alt. 2), which explains the consistency of Alternative 2 with the ROS classification of Primitive.

It is also important to note that recreational impacts to the PCT would be lesser than those that would occur along the Five Lakes Trail and on the eastern edge of the National Forest System-GCW, because the PCT is considerably further to the west and thus, further from the project area. It is likely that the only recreational impacts that would occur to the PCT would be noise impacts resulting from occasional helicopter usage during the construction phase. Helicopters would be used during the construction phase to transport personnel and equipment to the project area, and during installation of lift infrastructure. Total helicopter usage over a 180-240-day construction season is not anticipated to exceed approximately 20 days.

0179-6, Alternatives (A)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning

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Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0179-7, Resources Protection Measures/Mitigation Measures (RPM/MM)

The comment lists various RPMs of which the comment is supportive. All RPMs and mitigation measures included in the Draft EIS/EIR are also included in the MMRP (see Appendix I of the Final EIS/EIR), which will be adopted by the County and implementation will be overseen by the Forest Service and the County.

Regarding RPM NOI-3, the comment requests that helicopter flight patterns should also be designed to avoid and minimize flights over the PCT to the extent practical. In response to this comment, RPM NOI-3 is revised as follows:

Helicopter flight patterns will be designed to avoid and minimize flights over residential areas ~~and, the National Forest System - Granite Chief Wilderness Area, and the Five Lakes Trail~~ to the extent practical. For Alternatives 3 and 4, helicopter flights over the National Forest System -Granite Chief Wilderness will be prohibited.

Regarding RPM NOI-6, the comment requests that construction-related blasting and helicopter flights should not be allowed to occur on Saturdays. In response to this comment (and comment 0166-23), RPM NOI-6 is revised as follows:

Construction noise emanating from any construction activities, including any blasting and helicopter flights, is prohibited on ~~Sundays~~ weekends and Federal Holidays, and shall only occur:

- a) Monday through Friday, 6:00 am to 8:00 pm (during daylight savings)
- b) Monday through Friday, 7:00 am to 8:00 pm (during standard time)
- c) ~~Saturdays, 8:00 am to 6:00 pm~~

In addition, temporary signs 4 feet x 4 feet shall be located throughout the project, as determined by the Placer County Development Review Committee (DRC), at key intersections depicting the above construction hour limitations. Said signs shall include a toll free public information phone number for the Disturbance Coordinator where surrounding residents can report violations and the ~~developer/builder~~ Disturbance

0179

Coordinator will respond and resolve noise violations. The Disturbance Coordinator will respond to noise complaints in accordance with the requirements of RPM NOI-2. This condition shall be included on the Placer County Improvement Plans and shown in the County's development notebook.

Pacific Crest Trail Association

0179

0179-7
cont'd

- Completing all ground disturbing activities and construction of the gondola alignment in a single construction season. All site clean-up, soil stabilization, revegetation, winterization, and related activities will be completed by October 15. (MUL-7)
- Notice of all construction activities potentially affecting recreation areas and trail systems, including temporary trail closures, within the Forest Service trail system. (REC-2)
- Signs advising recreationists of construction activities and directing them to alternative trails will be posted at all trail access points or in locations as determined through coordination with the respective jurisdictional agencies. Signage describing the closures will be posted at trail access points one week prior to closures, will remain posted during the entire closure period, and will be removed upon completion of construction. (REC-3)
- Signage will be posted at both the Squaw Valley and Alpine Meadows base terminals and mid-stations stating that walking or hiking trail access directly from the gondola (i.e., by exiting at a mid-station) is strictly prohibited. (REC-4)
- Prior to development of above ground structures, facilities, and features, design plans will be reviewed and approved by the Forest Service as part of the Design Review Process. Applicable structures must meet the Built Environment Image Guide (BEIG) guidelines. (SCE-1)
- Choose structure design, scale, and color of materials, location, and orientation to meet the Forest Service visual quality objective of the Project Area and reduce potential visual contrast. (SCE-2)
- Stumps must be cut as low as possible to the ground to avoid safety hazards and lessen scenic impacts. (SCE-3)
- All structures, facilities, and above ground features will meet color guidelines. Bright colors are inappropriate for the forest setting. The colors must be muted, subdued colors because they blend well with the natural color scheme. (SCE-4)
- All structures, facilities, and above ground features will meet applicable reflectivity guidelines. This includes any reflective surfaces (metal, glass, plastics, or other materials with smooth surfaces), that do not blend with the natural environment. (SCE-5)
- Trees will be retained, where possible, to provide species and size diversity, maintain forest cover, and screen facilities. (SCE-6).
- The night lighting design shall be designed to minimize impacts to adjoining and nearby land uses. No lighting is permitted on top of structures. (SCE-8)
- Helicopter flight patterns will be designed to avoid and minimize flights over residential areas and the Granite Chief Wilderness Area to the extent practical. (NOI-3)
 - **Note:** PCTA requests that the PCT be incorporated into this RPM.
- Construction noise emanating from any construction activities, including any blasting and helicopter flights, is prohibited on Sundays and Federal Holidays, and shall only occur:
 - a) Monday through Friday, 6:00 am to 8:00 pm (during daylight savings)
 - b) Monday through Friday, 7:00 am to 8:00 pm (during standard time)
 - c) Saturdays, 8:00 am to 6:00 pm (NOI-6)
 - **Note:** PCTA requests that blasting and helicopter flights *Not occur on Saturdays*, for Saturdays see the most visitor use out of any day of the week.

In addition to the RPM's above, PCTA suggests the project incorporate the following RPM's:

0179-8

0179-7 cont'd, Resources Protection Measures/Mitigation Measures (RPM/MM)

0179-8, Resources Protection Measures/Mitigation Measures (RPM/MM)

An additional RPM stating that project components must meet the VQO of Partial Retention (where applicable) is not necessary because project components would be compliant with all direction provided by the VMS. In particular, the Draft EIS/EIR states on page 4.2-23 that "Alternative 2 would be compliant with the Partial Retention VQO designated for upslope facilities at Alpine Meadows." Please refer to Section 4.2, "Visual Resources" for further discussion related to the project's compliance with the VMS and other applicable regulations.

Pacific Crest Trail Association

0179

- 0179-8 cont'd
- 0179-9
- 0179-10
- Project impacts will meet a Visual Quality Objective (VQO) of partial retention and must be retained. (Forest Service SMS)
 - Project implementation activities will be communicated with PCTA staff.
 - PCTA will use its public website to alert trail users of the project activities and associated impacts.
 - Project will offset associated impacts with the development of safe and adequate parking facilities at the 5 Lakes trailhead.
 - The amenities at the 5 Lakes trailhead do not adequately serve the public. Visitation far exceeds the trailhead resources. Currently, trailhead parking is completely absent. In addition, the LRMP identifies the 5 Lakes trail as one of the most popular day hikes on the Tahoe National Forest.

0179-11

Please note that PCTA recognizes that Alternative 4 results in less of an overall effect in various areas such as recreation and noise but prefers Alternative 3 regarding the PCT and the experience the trail should offer to hikers and equestrians.

PCTA staff are eager and willing to provide time and support with this project as it develops to ensure that the PCT receives the appropriate management as intended with its designation as a National Scenic Trail. Please let me know if you or your staff has questions regarding PCTA's comments on the Squaw Valley/ Alpine Meadows Base-to-Base Gondola Project. Thank you for your time and support.

Sincerely,



Connor Swift
PCTA Northern Sierra Regional Representative

CC:
Beth Boyst, U.S. Forest Service
Joanne Roubique, U.S. Forest Service
Joe Flannery, U.S. Forest Service
John Groom, U.S. Forest Service
Justin Kooyman, PCTA

0179-8 cont'd, Resources Protection Measures/Mitigation Measures (RPM/MM)

0179-9, Resources Protection Measures/Mitigation Measures (RPM/MM)

RPMs REC-1, REC-2, and REC-3, provide mechanisms for SVSH to coordinate with and notify the Forest Service and the public regarding construction activities, install signage to inform the public about trail reroutes and/or temporary closures, and avoid conflicts with planned events. This coordination would include coordination with PCTA, which could then use its public website to alert trail users of the project activities and associated impacts, as suggested in the comment. No changes to the existing RPMs or addition of a new RPM specific to coordination with PCTA is warranted.

0179-10, Resources Protection Measures/Mitigation Measures (RPM/MM)

Development of parking facilities at the Five Lakes Trailhead will not be required through an additional RPM because the analysis conducted for the project does not indicate that additional visitation on the Five Lakes Trail would occur. As such, an additional RPM would not be necessary in response to this issue as perceived by the commenter.

0179-11, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.



June 1, 2018

Joe Flannery
US Forest Service, Tahoe National Forest
631 Coyote St.
Nevada City, CA 95959

Heather Beckman
Placer County Planning Services Division
775 North Lake Boulevard
Tahoe City, CA 96165

Via: jflannery@fs.fed.us; Hbeckman@placer.ca.gov

Dear Mr. Flannery and Ms. Beckman,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement/Environmental Impact Report for the Squaw Valley-Alpine Meadows Base-to-Base Gondola project.

The mission of the Truckee River Watershed Council (TRWC) is to bring the community *Together for the Truckee* to protect, enhance, and restore the Truckee River watershed. We identify, coordinate, fund, and implement restoration and preservation projects directly related to the watershed's health, beauty, and economy. Combining sound science and a deep understanding of our region's values, we focus on the root causes of threats to the Truckee River watershed. As such, we are interested in the proposed project.

TRWC understands there are four alternatives under consideration: 1) no action; 2) the proposed action alternative; and 3 & 4) alternative actions. The proposed action alternative will have severe and transformative effects on the environment of Bear Creek, Olympic Valley, and Granite Chief Wilderness. Particularly notable are the 1) serious and unavoidable effects on sensitive species such as the Sierra Nevada yellow-legged frog; 2) the intrusion into Granite Chief Wilderness; 3) long-term impacts to water quality in the Squaw Creek, Bear Creek, and Truckee River watersheds; and 4) the adulteration of the visual character of the iconic Olympic Valley. The effects of the proposed action would be far-reaching and irreversible. It runs counter to TRWC's goal of completing 50 high

0189-1

0189

0189-1, Other (O2)

These issues are addressed in the Draft EIS/EIR in Sections 4.3, "Wilderness," 4.14, "Wildlife and Aquatics," 4.17, "Hydrology and Water Quality," and 4.2, "Visual Resources," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

The comment implies that there would be significant and unavoidable impacts related to Sierra Nevada yellow-legged frog, the Granite Chief Wilderness, water quality, and visual resources under Alternative 2. This is not entirely true, in that the only significant and unavoidable impacts associated with the project include an impact to visual resources (Impact 4.2-2), impacts on vehicular queuing at Caltrans intersections (Impact 4.7-4), cumulative traffic impacts (Impacts 4.7-11 through 4.7-13) and construction noise impacts (Impact 4.9-1); these are summarized in Section 5.2.1, "Significant Environmental Effects that cannot be Avoided," of the Draft EIS/EIR.

The remainder of this comment is directed towards the project approval process. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

530.550.8760
P.O. Box 8568
Truckee, CA 96162
www.truckeeriverwc.org

Truckee River Watershed Council is a nonprofit 501(c)3 organization.

0189-1 cont'd, Other (O2)

0189-1
cont'd

priority projects in the next 10 years to improve the health, function, and resilience of the watershed.

In light of these severe impacts, TRWC urges the US Forest Service and Placer County not to select the proposed action alternative. Thank you for your consideration.

Sincerely,



Lisa Wallace
Executive Director



Matt Freitas
Program Manager

530.550.8760
P.O. Box 8568
Truckee, CA 96162
www.truckeeriverwc.org

Truckee River Watershed Council is a nonprofit 501(c)3 organization.

0001

Date submitted (Pacific Standard Time): 5/22/2018 3:32:00 PM

First name: Nick

Last name: Anderson

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email: radfillmorepad@gmail.com

Phone:

Comments:

0001-1

I would like to voice my opinion in opposition to the base to base gondola project. The fact that the proposals most "environmentally superior" version still has 33 adverse environmental impacts shows that there really is no way to build it without having an array of negative effects. The proposed benefits are a very weak proposition compared to the negative aspects of it.

I am a long time Squaw Valley and Alpine meadows resort skier who buys a season pass every year, a backcountry skier who enjoys exploring the local area, and someone who repeatedly enjoys hiking in the 5-lakes basin area of the Granite Chief wilderness.

As someone who uses the Sierra Club backcountry huts in the Tahoe area, I remember that the former Bradley hut used to be situated in the 5-Lakes basin. That hut was a very low-impact, in tune with nature shelter to allow for non-powered human recreation. And when congress designated the Granite Chief wilderness, the Sierra Club did the right thing and tore down that Bradley hut. It was re-built in the pole creek drainage off highway-89, because adhering to the strict definition of having no human development in a wilderness area was a higher goal than even keeping a small hut that was already built there.

The impact of the construction, lift towers and all the rest to the beauty and solitude of the area would be incalculable. The fact that Granite Chief is a federally designated wilderness is not something that Squaw Valley should be able to tamper with just so they can grow their business or to offer minor convenience to skiers.

The USDA/National Forest should not grant permission to run the gondola through land designated by Congress for national wilderness protection. That is not a higher ideal than the protection of wilderness for the benefit of the greater public and the ecosystem itself.

Thank you for your consideration.

0001-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0002

Date submitted (Pacific Standard Time): 5/20/2018 6:29:54 AM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email:

Phone:

Comments:

I support Alternative 1- the no action alternative. The base to base gondola will not alleviate traffic and greatly impair the scenic values of an area immediately adjacent to Granite Chief Wilderness.

0002-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0003**0003-1, Opinion (O1)**

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0003-1 |

Date submitted (Pacific Standard Time): 6/11/2018 4:01:57 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email: Hallan2290@gmail.com

Phone:

Comments:

This will create irreversible damage to the Lake and create an amusement park feel which is not the reason people go to Tahoe. And it will only make the traffic worse. There is no demand or need for this.

0004

Date submitted (Pacific Standard Time): 5/21/2018 2:42:38 PM
First name: Tyler
Last name: Asher
Organization:
Title:
Official Representative/Member Indicator:
Address1: 371 jackpine st.
Address2:
City: Tahoe City
State: CA
Province/Region:
Zip/Postal Code: 96145
Country: United States
Email: Tyler2216@gmail.com
Phone: 6178354083
Comments:

To whom it may concern, I am writing to you today in opposition of this proposed base to base gondola. I don't believe that it is going to address the issues of traffic and congestion in the valleys when operating. Also, I believe it will take away from each valleys unique characteristics that make people choose which to visit in the first place. Thank you.

0004-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0005

Shirlee Herrington

From: Michael Ayers <mayers@nevadafirm.com>
Sent: Friday, May 18, 2018 12:23 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: US Forest Service & Placer County release draft environmental studies

Dear USFS/Placer County:

0005-1

I support the California Express Gondola because it will further promote the Tahoe area ski resorts, the ability to hold Olympic and FSI Events in the Tahoe area, which will create additional jobs, and secure Tahoe as one of the leading ski areas in the United States. Moreover, according to the most recent report, the expansion of the Gondola will assist with traffic and consumption of fossil fuels; currently there is a shuttle system in place between the two resorts which creates an additional carbon footprint.

Regards,

Mike Ayers

Michael Ayers
Attorney
Reno Office



Tel: 775.851.8700 | Fax: 775.851.7681
800 S. Meadows Parkway, Suite 800, Reno NV 89521

Tel: 702.791.0308 | Fax: 702.791.1912
400 S. 4th Street, Suite 300, Las Vegas NV 89101

www.nevadafirm.com

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0005-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0006

Date submitted (Pacific Standard Time): 5/22/2018 3:05:57 PM

First name: Elena

Last name: Bakker

Organization:

Title:

Official Representative/Member Indicator:

Address1: 909 112th Ave NE

Address2: Apt 810

City: Bellevue

State:

Province/Region: Washington (WA)

Zip/Postal Code: 98056

Country: United States

Email: erb339@nyu.edu

Phone: 3602984776

Comments:

One of the most beautiful, awesome, and true places on this earth left is the Tahoe and Truckee mountains, lakes, and land. In a world that is building building building, saving the few true natural treasures that remain is not only necessary, but a mandatory human act.

The idea of destroying the beautiful land the locals SURVIVE on for simple tourist attractions? Appalling does not even cover it.

Do not let the greed of human money destroy one of the last true places that show us WHY we live.

0006-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0007

Shirlee Herrington

From: Daniel Baldassare <dbald27@gmail.com>
Sent: Monday, June 11, 2018 3:20 PM
To: Placer County Environmental Coordination Services
Subject: proposed construction of the Squaw Valley Alpine Meadows base-to-base gondola project and its impacts

0007-1

I am writing to oppose the construction of the Squaw Valley to Alpine Meadows gondola. As a former resident in the area and avid backpacker and hiker, I am aware of the damage this project would do to an already over developed area. This project is not a reasonable way to alleviate congestion, and given the size of the two resorts adds little benefit regardless.

0007-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0008

Date submitted (Pacific Standard Time): 4/30/2018 9:59:53 AM
First name: Jeff
Last name: Ball
Organization:
Title:
Official Representative/Member Indicator:
Address1: 2436 Park Estates Dr
Address2:
City: Sacramento
State: CA
Province/Region:
Zip/Postal Code: 95825
Country: United States
Email: telecranker@yahoo.com
Phone: 9164878152
Comments:

As a back-country skier, hiker, backpacker and former Tahoe resident, I object to any proposal to build a gondola between Squaw Valley & Alpine Meadows. Turning Sierra wilderness into a theme park for the rich is not acceptable. And turning Hwy 89 into a parking lot is not acceptable.

0008-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0009

0009-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0009-1

Date submitted (Pacific Standard Time): 6/10/2018 8:48:31 AM

First name: Jeff

Last name: Ball

Organization: CAH311738968

Title:

Official Representative/Member Indicator:

Address1: 2436 Park Estates Dr

Address2:

City: Sacramento

State: CA

Province/Region:

Zip/Postal Code: 95825

Country: United States

Email: jeffball@gmail.com

Phone: 9164878152

Comments:

As a back-country skier and hiker, I am opposed to any ski resort incursion into Granite Chief Wilderness. Lift towers are not acceptable! The wanton expansion of Squaw Valley is disgusting. Tahoe is being ruined by developers, who have bought-off the 4 Placer Co supervisors who do not live up there. Traffic is already terrible and will be even worse. Fire safety has not been adequately addressed. Air Quality will be noticeably degraded. Kiss Tahoe goodbye.

Shirlee Herrington

From: Walter F. Baumgartner <walter@cypressgrowth.com>
Sent: Friday, May 18, 2018 1:32 PM
To: Placer County Environmental Coordination Services
Subject: Squaw/Alpine Connection

0011-1 | Hello,
I support the Squaw/Alpine gondola connecting the two ski areas. I enjoy skiing both areas and it would be more convenient to have a gondola versus a shuttle; it would also be more environmentally friendly.
Best,
Walter

Walter Baumgartner
312 Edgecliff Way
Tahoe City, CA

0011-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0012

Shirlee Herrington

From: Steve Bemus <stevebemus@gmail.com>
Sent: Monday, June 04, 2018 6:58 AM
To: Placer County Environmental Coordination Services
Subject: I support California Express Gondola

Dear USFS/Placer County:

0012-1 | I support the California Express Gondola because it will enhance outdoor opportunities for my kids and help move traffic in the area (environmental benefit). It may also be an economic benefit to the Lake Tahoe, Truckee, Reno, Sacramento regions.

Thx,
Steve B.

Typos courtesy of iPhone 🍏

0012-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0013

June 5, 2018

County of Placer
Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95631

VIA EMAIL

RE: Draft Environmental Impact Report (DEIR) for the Squaw Valley/Alpine Meadows Base-to-Base Gondola Plan

Dear Placer County and US Forest Service:

My name is Mary Bennett, and I'm a 30 year Full Time resident of Alpine Meadows, CA. I have carefully reviewed this Gondola Project DEIR that is being proposed for the Squaw Valley/Alpine Meadows area. Here are some of the basic problems and concerns that I can see from the information presented in the DEIR.

- Ecologically sensitive areas surrounding the gondola area. This needs to be more fully described and evaluated.
- Disturbing sites by blasting, heavy equipment, ATV, helicopters, trucks, people, etc. What are the plans, impacts, and more specifically, how are you going to mitigate existing residents short- and long-term.
- Sensitive Alpine plant species in the area. Where are the mitigation plans?
- Wildlife corridor area. Where is the information that specifically relates to all the habitat loss, and wildlife that would be greatly affected by having their existing corridors annihilated?
- Since there is heavy-use of Five Lake Trails during summer months, how is this addressed?
- Visual Impact to Bear Creek Homeowners, most of the streets above Mineral Springs, Snowcrest and Upper Bench Road. There are limited discussion relating to the visual impacts upon residents in these area.
- The constant and heavy use of noise equipment during construction period, and then running during operational periods is not thoroughly discussed nor mitigated.
- Safety Issue during high wind conditions. Please discuss thoroughly the type of tram systems and operational procedures that would be in place during high wind conditions.
- Cumulative Impacts with Mid Terminal for Caldwell or new home sites being proposed. Why isn't this discussed.
- Public Safety/Hazards
- Why isn't the Alpine Meadows General Plan being updated, by Placer County Officials? Don't you think that it would be relevant to have an update Plan, since its outdated (i.e., 1968), prior to moving forward with this DEIR?

Page 1 | 3

0013-1, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

0013-2, Alternatives (A)

Biological resources are addressed in Sections 4.12, "Vegetation," 4.13, "Botany," 4.14, "Wildlife and Aquatics," and 4.15, "Wetlands," in the Draft EIS/EIR. No specific reasons are provided as to how these issues are not more fully described and evaluated. Therefore, a further response cannot be provided.

0013-3, Resources Protection Measures/Mitigation Measures (RPM/MM)

These issues are addressed in the Draft EIR, for example, in Sections 4.7, "Transportation and Circulation," 4.9, "Noise," and 4.10, "Air Quality." Resource Protection Measures (RPMs) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. All RPMs relevant to reducing environmental impacts are identified in the discussion of each impact. The Mitigation Monitoring and Reporting Program prepared for the project (included in the Final EIS/EIR) identifies all the RPMs and mitigation measures that would be implemented as well as the timing and responsibility for each measure.

0013-4, Resources Protection Measures/Mitigation Measures (RPM/MM)

See responses to Comment 0013-3, above regarding RPMs and mitigation plans. Sensitive plants, and relevant RPMs and mitigation to protect sensitive plant species are addressed in Draft EIS/EIR Section 4.13, "Botany."

0013-5, Wildlife and Aquatics (W&A)

Effects on wildlife, and wildlife movement corridors are addressed in Section 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR. Specifically, see the discussion under Impact 4.14-6 for Alternatives 2, 3, and 4, which addresses disturbance or

0013

loss of wildlife movement, wildlife corridors, and native wildlife nursery sites.

0013-6, Recreation (R1)

See Section 4.1, "Recreation," in the Draft EIS/EIR. Specifically, see the discussion of "Dispersed Recreation Experience" under Impact 4.1-1 that addresses impacts on the Five Lakes Trail during project construction.

0013-7, Visual Resources (VR)

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. They are also visible to a greater number of people traveling along the roads or from the base terminal. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be, or were required to be, simulated for the purposes of this EIS/EIR. Instead, highly frequented or prominent public areas and visually sensitive vistas were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does

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not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0013-8, Noise (N)

Noise impacts are addressed in Section 4.9, "Noise," of the Draft EIS/EIR. Impacts 4.9-1 and 4.9-2 describe the project's construction noise impacts, and Impacts 4.9-3 and 4.9-4 describe the project's operational noise impacts. Resource Protection Measures (RPM) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. No specific reasons are provided as to how these noise issues are not thoroughly discussed or mitigated. Therefore, a further response cannot be provided.

0013-9, Public Safety (PS)

Wind closures would be implemented as necessary to ensure safe operation of the gondola. Further detail on this matter is beyond the scope of this analysis, as the specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives.

0013-10, Cumulative Effects (CE)

Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR.

0013-11, Public Safety (PS)

See Section 4.6, "Public Safety," in the Draft EIS/EIR.

0013-12, Alternatives (A)

No specific issues related to the content, analysis, or

0013

conclusions in the Draft EIS/EIR are raised in this comment.
No further response is warranted.

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- 0013-13 The US Forest Service needs to be an active participant in the utilization of forest service lands. The proposed tram route cuts through Granite Chief Wilderness Designation as well as the popular Five Lakes Trail which is heavily accessed during the summer months. How in the world will this project mitigate the effects of this traverse?
- 0013-14 Alpine Meadows is heavily populated with deer, coyotes, bears, beavers, mountain lions, bobcat, numerous birds, etc. Most of the above large mammals and large animals can be seen on any given day during the summer and winter months. There are several rather large pristine lakes that are located throughout Alpine Meadows. Wildlife will be heavily impacted during construction of this gondola. Please discuss further in the DEIR, and demonstrate that no effect will occur upon the existing populations of these animals.
- 0013-15 Many homeowners built their homes with visual views of the Granite Chief Wilderness area, Five Lakes Basin and Five Lakes Trail. With the gondola so visible on a ridgeline it would have a negative effect upon these homes and their subsequent resale value. A thorough economic impact assessment should be completed by the County and US Forest Service to demonstrate that no effect would occur.
- 0013-16 Many homes are owned by second homeowners, who specifically bought property in Alpine Meadows for "peace and quiet" within this valley. Most are heavily used during the summer months for that reason, Peace and Quiet. For the reason, noise during construction would absolutely ruin most of the neighbor's time to enjoy a hike or walk around during the day time hours in the valley. Noise during the operation would severely impact the Wilderness area. We are now currently impacted by the Gazex Avalancher that seems to be operational during all hours of the day by Alpine Meadows. Are more of these planned in conjunction with this project? If so, how many are being proposed? What will happen with the habitat corridor due to all the excessive noise from the gondola?
- 0013-17 Alpine Meadows is surrounded by high vistas and wonderful mountain ranges. Having a gondola filled with people looking down on their homes during the middle of the day, seems rather odd to me. A fine example would be the funitel at Squaw Valley that runs alongside many homes, going to the upper mountain.
- 0013-18 Residents in Alpine Meadows are now being faced with several proposals moving forward that relate to massive residential developments in this small community. The Village at Squaw Valley, The Roller Coaster, White Wolf Development, The Alpine Sierra, The Stanford Chalet, along with Tahoe City new hotel, are a few of these developments. From a standpoint of cumulative development, what effect will all of these developments have on the region?
- 0013-19 It is difficult to keep up as Placer County – again, why has the County not updated the Alpine Meadows General Plan, with all of this planned growth moving forward? Without a current and updated General Plan, it is difficult for anyone to sufficiently analyze impact. Additionally, how does the County's Climate Action Plan fit into the context of building of this new gondola?
- 0013-20 I have direct concerns with the use of heavy equipment, trucks, ATV's on Forest Service-managed land or private land for that matter during a high flammable fire season. We have experienced a tremendous

Page 2 | 3

0013-13, Resources Protection Measures/Mitigation Measures (RPM/MM)

Impacts related to the GCW and the Five Lakes Trail are addressed in Sections 4.3, "Wilderness," and 4.1, "Recreation," respectively, in the Draft EIS/EIR. Resource Protection Measures (RPM) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. These are also included in the MMRP, which is part of the Final EIS/EIR and includes timing and responsibility for each measure.

0013-14, Wildlife and Aquatics (W&A)

See Section 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR. Resource Protection Measures (RPMs) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. There is no obligation under NEPA or CEQA that a project have no effect on a particular resource; however, significant effects must be mitigated, and under CEQA, feasible mitigation must be implemented to attempt to reduce significant impacts to less than significant levels. The RPMs and mitigation measures in the EIS/EIR achieve these standards. No specific suggestions are provided in the comment that would guide inclusion of further information/discussion in the EIS/EIR. Therefore, further response cannot be provided.

0013-15, Socioeconomics (S1)

The extent to which the project would, or would not, have an effect on visual resources is documented and depicted in Section 4.2, "Visual Resources" and simulated through the inclusion of 63 photo-simulations presented in Appendix D. The analysis of visual impacts for the project did not specifically correlate or assess the anticipated impacts of the project to property values. The project, if approved, would extend the extent of visible ski area infrastructure, which is presently evident within the surrounding landscape. While some viewers may perceive this to present a potential negative effect on property values, others may deem the added connectivity of the two ski areas, as proposed, as having a potential positive impact on property values.

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It is also important to note that Section 4.5, "Socioeconomics and Environmental Justice" was included in the Draft EIS/EIR as a requirement of NEPA, not CEQA, as CEQA does not address these issues. Section 4.5.2.2, "Effects Analysis and Significance Criteria" lays out the analytical indicators that were used to guide analysis in this section, and does not include property values of homes near the project area as an analytical indicator guiding analysis. Instead, effects analysis in Section 4.5, "Socioeconomics and Environmental Justice" was conducted through the lens of potential effects of the project on population, employment (part-time seasonal employment vs. full-time equivalents), Town/County tax revenue, tourism and visitor spending, and the project's compliance with Executive Order 12898, Environmental Justice. As such, an economic assessment of the project's potential impacts on the property values of homes near the project area was not conducted.

0013-16, Noise (N)

The comment is concerned with noise disturbance during construction and operation of the project. Noise impacts are addressed in Section 4.9, "Noise," of the Draft EIS/EIR. Impacts 4.9-1 and 4.9-2 describe the project's construction noise impacts, and Impacts 4.9-3 and 4.9-4 describe the project's operational noise impacts. Resource Protection Measures (RPM) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. No specific reasons are provided as to how these noise issues are not thoroughly discussed or mitigated. Therefore, a further response cannot be provided.

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Potential noise effects on wildlife and effects on wildlife movement corridors are addressed in Draft EIS/EIR Section 4.14, "Wildlife and Aquatics."

0013**0013-17, Other (O2)**

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0013-18, Cumulative Effects (CE)

Cumulative effects are addressed in the Draft EIS/EIR in Sections 4.1 through 4.17. The projects identified in the comment are included in Section 3.5, "Cumulative Effects Analysis Methodology," and were considered in the cumulative analysis in the Draft EIS/EIR.

0013-19, Land Use (LU)

Placer County recognizes the Alpine Meadows General Plan is dated. The County endeavors to update general plans as staffing and resources allow. In the interim, the current plan is the plan of record and was appropriately utilized within this analysis. Please refer to Section 4.4.1.2 "Regulatory Setting" in the Draft EIS/EIR for further information.

The Placer County Sustainability Plan, commonly referred to as the Climate Action Plan, has not yet been approved. As such, an analysis of the project's consistency with the Sustainability Plan is not appropriate or required. The methodology for assessing the anticipated effects that the gondola would have on greenhouse gas emissions and climate change is provided by the Placer County Air Pollution Control District. Please refer to Section 4.11, "Greenhouse Gas Emissions and Climate Change" in the Draft EIS/EIR for further information.

0013-20, Public Safety (PS)

See Section 4.6, "Public Safety," in the Draft EIS/EIR. Specifically, see the discussion under Impact 4.6-1, which describes hazards (including wildfire hazards) associated with project construction, operation, and maintenance. RPM HAZ-4 would specifically address wildfire hazards and would be

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included as a required component of the project by the Forest Service and the County.

0013

0013-20 cont'd, Public Safety (PS)

0013-20
cont'd | amount of fires in Northern California, many of which have largely been out of control, due to overgrowth of vegetation. What type of precautions would the County take to control a fast moving fire caused by the construction or operation of this equipment.

0013-21 | Does it make any sense to add this gondola going over one of the most scenic ridgelines and then add to the already congested traffic mess that we now face on a daily snow day in Alpine Meadows? Does it not make sense to solve the traffic problems first - that most of residents at Squaw Valley/Alpine Meadows have, before moving forward with a gondola being constructed? Traffic studies should be done on a busy day during the most heavily-utilized winter days, not random days during the year.

0013-22 | There are a lot of empty buses running up and down Alpine Meadows during peak ski periods. Doesn't it not make sense to spend more money on upgrading the current buses, and regulate the time of those buses, so that more individuals can be accommodated, and moved off of existing roads? The County owes the residents of both Alpine and Squaw Valley more time to consider and study ways to eliminate traffic coming from out of the region.

0013-23 | I also find Exhibit 4.5-3 Placer County Median Household Income and Percentage of Population misleading. I would assume most of Squaw Valley Full Time employees are not making \$73,948 as a median income and that the poverty level for this area is well below the 8.9% figure shown on page 238. Many people that I know work two or three jobs to be able to live in the Tahoe area.

I sincerely hope that these issues will be considered and addressed.

Sincerely,



Mary Bennett
1280 Mineral Springs Trail
Alpine Meadows, CA 96146

0013-21, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Potential impacts to scenic resources are addressed in Section 4.2, "Visual Resources," in the Draft EIS/EIR. The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation." Section 4.7.2.1, "Methods and Assumptions," provides a detailed description of the methodology used for the traffic impact analysis. As described therein, peak winter visitation was utilized in the analysis to ensure that the project's transportation impacts were not understated.

0013-22, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Section 2.3.2.1 of the Draft EIS/EIR evaluates an "Improvements to Existing Shuttle System Alternative." See the Master Response above on this topic, in Section 1.8, "Master Responses," for more information on the Improvements to Existing Shuttle System Alternative.

The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation."

Regarding service by Tahoe Area Rapid Transit Service (TART) to Alpine Meadows, please see response to comment 0144-36 describing the difficulties associated with providing this service. However, Placer County is continuing to promote improved transit service in the project region through implementation of the "Systems Plan Update for the Tahoe Truckee Area Regional Transit in Eastern Placer County."

0013-23, Socioeconomics (S1)

The comment provides an opinion regarding the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a specific response is not warranted. It is noted that data provided in Exhibit 4.5-3 is included to provide indicators of the general conditions and environment within the county in which the project would occur.

0014

Will Hollo

From: Derik Benson/USA <Derik.Benson@cushwake.com>
Sent: Friday, May 18, 2018 2:13 PM
To: Scoping Comments
Subject: California Express Gondola - Please Support

"Dear USFS/Placer County:

0014-1

I support the California Express Gondola because it is a great amenity to the area and will help the ski resorts remain viable and compete in the challenging ski resort industry. I have skied Squaw and Alpine for the last 4 decades and hope to see this happen to improve the skiing experience. I am also an avid hiker, biker, and outdoorsman and see no negative long term impact with the construction of the Gondola. I hope you will support it.

Thanks,
 Derik

Derik Benson
 Managing Director
 CA License #01182654

Direct: 408-436-3670
 Mobile: 408-568-0325
 Fax: 408-615-3444
derik.benson@cushwake.com



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0014-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

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0015

Will Hollo

From: Steven Benton <stevebenton56@me.com>
Sent: Tuesday, June 5, 2018 8:40 PM
To: Scoping Comments
Subject: Support for the Squaw Alpine gondola

Hi,

0015-1 | My family and I support the building of the gondola to connect Squaw Valley and Alpine Meadows ski area. We are homeowners in Truckee and ski in these mountains in the winter and hike and bike in them during the summer and fall. The gondola would improve utilization while reducing road traffic between the two base areas.

Best regards,

Steve Benton

0015-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

0016-1 | **From:** Roxanne Beverstein <roxanne@c4media.com>
Sent: Tuesday, May 22, 2018 4:24 PM
To: Scoping Comments
Subject: No to the Gondola from Squaw Valley to Alpine Meadows

0016-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0017

0017-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0017-1

Date submitted (Pacific Standard Time): 6/11/2018 8:48:19 PM

First name: Marc

Last name: Blakeney

Organization:

Title:

Official Representative/Member Indicator:

Address1: 16900 placer oaks rd

Address2:

City: Los gatos

State: CA

Province/Region:

Zip/Postal Code: 95033

Country: United States

Email: Marcwlegette@yahoo.com

Phone: 4083588505

Comments:

The proposed alignment of the Squaw to Alpine gondola is bad. The proposal needs to be scrapped and start from scratch with a chairlift that has a much lower footprint. This is a pristine high alpine environment that must be considered with value in the decision making process.

I oppose the proposal.

Marc

Date submitted (Pacific Standard Time): 6/10/2018 1:11:14 PM

First name: Maya Tracy

Last name: Borhani

Organization:

Title:

Official Representative/Member Indicator:

Address1: P.O. Box 969

Address2: P.O. Box 969

City: 4070 N. Lake Blvd.

State: CA

Province/Region:

Zip/Postal Code: 96140

Country: United States

Email: gmcmaya@gmail.com

Phone: 3602985866

Comments:

Dear Foresters, Legislators, Planning Commissioners, and related organizational and local representatives,

0018-1 | This proposed project is ridiculous and detrimental to the ongoing environmental quality and diversity of the Lake Tahoe basin and surrounding mountain watersheds.

The EIR clearly states that there are numerous problems with this proposed project, ALL of which will deleteriously and severely impact this national treasure of Lake Tahoe.

THE EIR IS EXTREMELY FLAWED as a result.

0018-2 | Although the proponents claim that they care about Tahoe -- the environment and the culture-- clearly they don't even KNOW Tahoe culture or care about the environment here, or they would be more concerned about the impacts of this project. For example, one or more of the towers for the proposed gondola will stand precariously close to the Granite Chief Wilderness Area (a FEDERALLY protected wilderness area; WHY DESIGNATE THESE if we are going to turn around and endanger them by placing DEVELOPMENTS too close to these areas to significantly make a difference? This is my primary concern: placing towers (and the CONSTRUCTION required to make that happen) SO CLOSE to a federally designated and PROTECTED wilderness area is simply irresponsible, not to mention flagrantly in violation of the point of federally protected wilderness areas. In addition, the little frog that is endangered that lives in the headwaters of the American River that are in this area are two more reasons NOT to construct or develop ANY projects ANYWHERE NEAR the Granite Chief Wilderness.

0018-3 | What year is this? Have we not learned that we CANNOT CONSTRUCT near HEADWATERS of ANY river, and expect the environment to maintain its quality let alone to survive in its current pristine state. THIS IS UNACCEPTABLE. THERE IS NO REASON WHATSOEVER to develop near headwaters or to endanger this already endangered species list frog.

0018-4 | This project should be DENIED based on this extremely flawed EIR. NONE of the suggested alternatives are any better: ALL OF THEM RISK CRITICALLY ENDANGERING this federally recognized, pristine, currently UNDEVELOPED wilderness area.

And to that final point: One of the reason people go to a WILDERNESS AREA is to enjoy WILDERNESS -- not to gaze out on concrete towers, nor to see a gondola going by overhead, or even in the distance. THE POINT OF WILDERNESS AREAS is to get away from the hustle and bustle of civilization, as well as from PEOPLE, and all the trapping of development that this proposed (and ridiculously stupid) gondola will bring to our pristine Tahoe wilderness.

THIS EIR IS EXTREMELY and FUNDAMENTALLY FLAWED. A true EIR would reflect how inappropriate this project is for this particular location, and for the Tahoe basin and watersheds in general. EVEN the proposed "alternative" options are equally flawed (in one way or another) and do NOT reflect the point of an EIR, to honestly and thoroughly reflect the environmental risks of a project. This EIR tries to excuse away all the problems and flaws, even in the so-called alternative solutions.

0018-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project. The comment summarizes opinions regarding the Draft EIS/EIR that are addressed in more detail in subsequent comments. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0018-2, Wilderness (W2)

Impacts related to the Granite Chief Wilderness are addressed in Section 4.3, "Wilderness," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0018-3, Wildlife and Aquatics (W&A)

Impacts related to the Sierra Nevada yellow-legged frog are addressed in Section 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR. Impacts related to hydrology and water quality are addressed in Section 4.17, "Hydrology and Water Quality." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0018-4, Opinion (O1)

The comment does not provide specific reasons specifying why the Draft EIS/EIR is flawed. As noted in the previous comment, impacts related to wilderness are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR; impacts related to hydrology and water quality (including watersheds) are addressed in Section 4.17, "Hydrology and Water Quality."

The comment also states that the alternatives are flawed, but does not provide specific reasons for this assessment. Chapter 3, "Approach to the Analysis," of the Draft EIS/EIR describes the NEPA and CEQA requirements for environmental analyses, including alternatives analyses. The Draft EIS/EIR is a public disclosure document to ensure environmental factors

0018

are considered during the agencies' decision-making process. The alternatives analysis provided in the Draft EIS/EIR is adequate for the purposes of NEPA and CEQA.

0018

0018-4
cont'd

THIS PROJECT will NEVER be right for Tahoe, or Granite Chief Wilderness Area, and therefore should NOT EVER BE BUILT.

Sincerely,

Maya Borhani

0018-4 cont'd, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0019

0019-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The comment references several environmental impact topics that are evaluated in the Draft EIS/EIR; wilderness is addressed in Section 4.3, "Wilderness"; recreation and trails are addressed in Section 4.1, "Recreation"; water quality is addressed in Section 4.17, "Hydrology and Water Quality"; Sierra Nevada yellow-legged frog is addressed in Section 4.14, "Wildlife and Aquatics"; and noise is addressed in Section 4.9, "Noise." The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0019-1

Date submitted (Pacific Standard Time): 5/22/2018 2:48:41 PM
First name: Petra
Last name: Borhani-Bakker
Organization:
Title:
Official Representative/Member Indicator:
Address1: 10512 E Alder Creek Rd
Address2:
City: Truckee
State: CA
Province/Region:
Zip/Postal Code: 96161
Country: United States
Email: pborhanibakker@gmail.com
Phone: 3602980976
Comments:
To Whom It May Concern:

At a time when I am still fortunate enough to see wild, protected lands in an area held so dear to my and other's hearts, I can only cringe at the thought of a purely unnecessary gondola breaking its way through the majestic, protected Granite Chief Wilderness. The Five Lakes hike is my absolute favorite trail in the North Lake Tahoe/Truckee area. When you wind your way up its steep ascent and curve through the granite boulders and moss covered trees it forces you to embrace the wild place we're lucky to call home. Away from the noise of traffic and machines, you're quickly enveloped into a truly unique piece of land.

I urge you to listen to the environmental impacts this proposed gondola will have on a PROTECTED wildness area. The risk to water quality danger to native frog species and other animals, and intimately the truly unnecessary damage the project will cause upon the land. There will no longer be serenity and quite on the Five Lake trail, instead there will be a constant whirring and clicking of a gondola passing overhead. Please, in a time where citizens feel more and more powerless, please help us protect the Granite Chief wilderness and tell KSL that a gondola is not needed.

If Tahoe turns into a Vail due to companies like KSL being permitted to construct indoor water parks and base to base gondolas, I ask you, why do any of us live here? We live here for the wild and scenic beauty of the Sierra Nevada mountains, for the community that stands up to big corporations trying to destroy local treasures, and we live here because we're proud to protect what is vulnerable; we are proud to be active citizens in a beautiful place.

For the sake of my children who are yet a fleeting thought, I beg you to deny KSL the opportunity to ruin a local treasure. I dream of walking my children and their children up the Five Lake trail, and I urge to you allow that dream to flourish and come true.

Thank you for your time and consideration.

Sincerely,
Petra Borhani-Bakker

Date submitted (Pacific Standard Time): 6/3/2018 3:28:26 PM
 First name: David
 Last name: Bourke
 Organization:
 Title:
 Official Representative/Member Indicator:
 Address1: 1941 CUB LANE
 Address2: 1941 CUB LN
 City: Alpine Meadows
 State: CA
 Province/Region: CA
 Zip/Postal Code: 96146
 Country: United States
 Email: tahoeidea@gmail.com
 Phone: 5305831842
 Comments:
 Comments on Squaw Valley Alpine Meadows Base to Base Gondola EIR EIS

- 0020-1 | Upon reading the Draft EIS EIR for the the Squaw Alpine Base to Base Gondola Project it is clear that Alternative 2 will have dramatic negative impacts on the scenic quality of Alpine Meadows, create avoidable negative impacts related to avalanche control, significantly diminish the quality of skiing at Alpine Meadows, and be the least effective at transporting skiers between the two bases.
- 0020-2 | The granite cliff band, upon which the gondola is proposed to be built, is the most beautiful and dramatic scenic resource in the Alpine Meadows valley. It is no wonder that Congress intended for it to be included in the Granite Chief Wilderness. Currently this ridge line shows no impact of human activity, and it is striking in its beauty. Alternative 2, with its numerous towers and unloading station, will transform this scenic treasure into an eyesore.
- 0020-3 | Having lived in Alpine Meadows for over twenty years, and Alta, Utah before that, I am very accustomed to the impact of avalanche control work. The sound of explosives in the morning is usually a welcome event, knowing that we have fresh snow. The recent installation of Gazex devices has somewhat changed that. The concussive force created by the Gazex blasts impacts our home in a way that hand charges did not. The blasts shake the house, and I am worried that seals on my dual pane windows will be broken as a result. Alternative 2 will require more Gazex installations, and therefore increase the negative impact of avalanche control work on the residents of Alpine Meadows.
- 0020-4 | Having skied at over 60 ski areas in North America and Europe, I can honestly state that Alpine Meadows can provide some truly amazing skiing. One of the things that makes Alpine Meadows so amazing is the area around Bernie's Buttress. Currently this area is access by a long traverse that includes a little hiking/sidestepping. This situation maintains the high quality of skiing in this area. Not only does it keep the area from being a mogul field, but also people who make the effort to ski here will ski fall line all the way to the parking lot, even knowing that they will have to walk or skate back to the lift. This allows uncut powder to be skied days after a storm. Unfortunately Alternative 2 will unload people from the lift at the top of Bernie's Bowl. This will not only turn this southeast facing slope into a bump field, but also, having made no effort to get there, most of the skiers will not ski straight down to the parking lot, because they will have to do a little skating at the bottom. Instead they will make a few turns and then start traversing to the base of the lift, thereby turning Pond Slope into a series of random traverse lines and utterly ruining the skiing experience for those who have been enjoying this area for decades. In this way the skiing experience in Alpine Meadows will be significantly diminished by the installation of the Base to Base Gondola as proposed under Alternative 2.
- 0020-5 | The ridge line proposed for the Gondola under Alternative 2 is very exposed to the wind. It is highly likely that the gondola will frequently not be able to operate due to high winds. The location of the other alternatives will be less exposed to the wind. Because of this, Alternative 2 will be the least effective at transporting people between the two bases.

0020-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0020-2, Visual Resources (VR)

Impacts related to the GCW are addressed in Sections 4.2, "Visual Resources," and 4.3, "Wilderness," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0020-3, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0020-4, Recreation (R1)

Implementation of Alternative 2 may change the current pattern of skiing within the Bernie's Bowl terrain; in particular, terrain that is currently accessed exclusively via hiking/sidestepping would be more easily accessible for gondola passengers unloading at the Alpine Meadows mid-station under Alternative 2. However, due the beneficial recreational impacts to ski area facilities anticipated to occur with implementation of any of the action alternatives, this potential change to the Bernie's Bowl terrain would not have the effect of altering the overall NEPA or CEQA effects conclusions as listed in Section 4.1, "Recreation" of the EIS/EIR.

Please refer to the text within Impact 4.1-1 (Alt. 2) in the Final EIS/EIR, below sub-header "Ski Area Facilities and Recreation Experience," for a description of impacts that may occur to skiable terrain within *the Buttress* and *Bernie's Bowl* areas as a result of implementation of Alternative 2.

0020

0020-5, Alternatives (A)

Wind closures would be implemented as necessary to ensure safe operation of the gondola. Extensive consideration of wind directions and velocities was included in the planning of each alternative evaluated, and many potential alternatives were ultimately eliminated from detailed analysis because of these considerations. Specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives.

Please refer to Section 2.3 of the Draft EIS/EIR for a discussion of alternatives and design components that were considered but not evaluated further (as well as a discussion of why these alternatives and design components were eliminated from detailed analysis in the Draft EIS/EIR).

0021

0021-1, Opinion (O1)

Impacts related to wilderness, views, traffic, recreation, wildlife areas, and irreversible impacts are addressed in various sections of the Draft EIS/EIR. Although the comment raises concerns regarding these environmental topic areas, no specific issues related to the analysis or conclusions in the Draft EIS/EIR are raised.

Date submitted (Pacific Standard Time): 6/5/2018 12:12:56 PM

First name: Steve

Last name: Bridges

Organization:

Title:

Official Representative/Member Indicator:

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State: CA

Province/Region:

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Country: United States

Email: steve96158@excite.com

Phone: 408 453-2367

Comments:

Opposed to proposed gondola construction in middle of designated wilderness area due to undesirable and incompatible accompanying side effects: negative impact on views, increased traffic, increased litter and trash, increased disturbance of and negative impact on important wildlife areas, etc. Opposed to private use of public lands for financial and private compensation purposes. Irreversible impacts: once it gets started it can never be taken back and restored to original undisturbed and undamaged use.

0021-1

0022

June 10, 2018

Shirlee I. Herrington
 Environmental Coordination Services
 Placer County Community Development Resource Agency
 3091 County Center Drive, Suite #190
 Auburn, CA 95603
 530-745-3132
 Email to Placer County: cdraecs@placer.ca.gov
 Email to Forest Service: comments@squawalpinegondola-eis.com

Subject: Comments on the Draft EIS/EIR for the proposed Squaw Valley | Alpine Meadows Base-to-Base Gondola Project, released 4/27/18

Dear Placer County & National Forest Service,

As a homeowner in Alpine Meadows for 19 years, I respectfully submit my comments on the Draft EIS/EIR for the proposed Squaw Valley/Alpine Meadows Gondola Project.

0022-1 | I am dismayed by the Draft EIS/EIR analysis. Many issues raised by me and others in response to the 2016 request for comments seem to have been dismissed in the Draft EIS/EIR as not significant or in conflict with the objective. In particular, the public requested in 2016 that a well-thought out alternate land-based, low-emission transportation service be evaluated, and that such land-based service be compared to the proposed gondola service in terms of impact to the visual scenery, air and water environment, noise pollution and enjoyment of the Granite Chief Wilderness. The Draft EIS/EIR has dismissed the land-based alternative, concluding that it does not meet the purpose and need of the project, and justifies this by saying that usage of the existing shuttle service has been low. As identified in the Draft EIS/EIR, the existing service has long waiting periods, of up to 30 minutes, so it is not surprising that usage is low. It is clear that KSL wants a Gondola in order to maximize their profits, and so the County and Forest Service have catered to KSL and concluded that a land-based service doesn't meet the purpose.

0022-2 | As stated in the documents, the overall purpose of the project is to enhance the visitor wintertime experience at both Squaw Valley and Alpine Meadows by providing direct connection between the ski areas for more convenient access to skiable terrain and resort amenities.

I ask the Forest Service and the County how do they determine that enhancing the convenience of a subset of skiers is more important than the experience of hikers on the Five Lakes Trail (5LT) and in the Granite Chief Wilderness (GCW)? Said another way, is improving the convenience of skiers who want to use two resorts on the same day worth the visual and noise pollution that will be created for those who want to enjoy the 5LT and GCW? It is unfathomable to me that the Forest Service who should be preserving our natural areas is supporting this development in order to provide a slight convenience to a small number of skiers.

0022-3 | The EIS/EIR concludes that the Gondola Project will have a significant and unavoidable impact on:

1. Visual Character of the area
2. Construction Noise – impacting hikers, residents and users of the GCW
3. Caltrans Intersections & Highways

0022-1, Alternatives (A)

See the Master Response related to the Improvements to Existing Shuttle System Alternative provided above in Section 1.8, "Master Responses." Strong indicators of impact differences between the action alternatives (Key Issues) are discussed in Section 2.4.1 of the EIS/EIR.

0022-2, Purpose and Need (P&N)

This Final EIS/EIR is intended to provide objective analysis of the resource impacts that are anticipated to occur as a result of the project. Rationale specifically related to how the project would or would not meet the project's identified Forest Service purpose and need is provided in the Record of Decision (ROD); Placer County's decision on how the project would or would not meet the project's identified CEQA project objectives will be made by the Placer County Board of Supervisors. Project approval or denial or based off of this rationale is provided in the ROD.

0022-3, Purpose and Need (P&N)

The comment summarizes the project's significant and unavoidable impacts, and questions why the purpose and need for the project should outweigh these significant and unavoidable impacts. CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the Placer County Board of Supervisors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; California Code of Regulations [CCR] Section 15093).

0022

Similarly, the Forest Service's Record of Decision provides rationale related to whether this project would meet the project's identified Forest Service purpose and need (with consideration of the project's significant and unavoidable impacts).

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0022-3
cont'd

Why should the County and Forest Service accept these significant and unavoidable impacts on an area that is a national treasure? The EIS/EIR concludes that Alternative 1 (No Action) is the environmentally superior alternative, but that Alternative 1 would not meet the basic project objectives related to providing a connection between the Alpine Meadows and Squaw Valley base areas or providing a more efficient and safer avalanche control system. The Draft EIS/EIR is essentially saying that this project has significant and unavoidable impacts, but if we don't do it, we can't achieve the objective of connecting the resorts. Why is this objective worth these significant and unavoidable impacts?

0022-4

It is interesting that a more efficient and safer avalanche control system is being linked to the Gondola. If that is the objective, then the County and Forest Service could easily put forth a proposal for the Gasex exploders without the Gondola. I would also like the County to explain to the public what the rules are to obtain approval to install Gasex exploders. Approximately 8 of these Gasex Exploders have been installed in Alpine Meadows within the last year, and I am not aware of any EIR or opportunity for public comment before these very large, ugly devices were installed with concrete platforms and above ground piping. If there is no EIR required, then the County and Forest Service can choose to satisfy their desire for this avalanche control system without linking them to the Gondola Project.

0022-5

The EIS/EIR clearly violates the spirit of several plans and policies designed to maintain the visual beauty of the Sierra Nevada. Technicalities are used to dismiss these violations. Here are several examples (underlining added by me):

1. The Placer County General Plan Policy 1.K.1 calls for development to not be located along ridgelines and steep slopes.
 - a. The EIS/EIR says that Alternative 4 does not present a potential inconsistency because the gondola would not traverse the ridgeline but would briefly pass over the ridgeline.
 - b. Does the County think that the public they represent would agree with this conclusion?

0022-6

2. The Squaw Valley General Plan prohibits buildings of more than 35 feet.
 - a. The EIS/EIR says that the Gondola towers (some over 50 feet) do not violate this height limit because they are towers and do not have exterior walls like a building.

0022-7

3. Scenic Routes: The EIS/EIR says that the project is in proximity to SR 89 and Squaw Valley Road, both of which were designated as scenic routes in the 1977 Placer County General Plan Scenic Highway Element. The goal for scenic routes in the Placer County General Plan is to "develop a system of scenic routes serving the needs of residents and visitors to Placer County and to preserve, enhance, and protect the scenic resources visible from these scenic routes" (Placer County 2013).
 - a. The EIS/EIR concludes that this is not a problem as "... SR 89 is an eligible route for designation as an official scenic highway but is not yet officially designated."
 - b. Would the voters agree that we should impair the scenic highway because it has not yet been designated as such?

0022-8

4. Per the EIS/EIR, "The overarching Goal [of Placer County General Plan Policy] 1.K for visual and scenic resources in the Placer County General Plan is to "protect the visual and scenic resources of Placer County as important quality-of-life amenities

0022-3 cont'd, Purpose and Need (P&N)

0022-4, Other (O2)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0022-5, Visual Resources (VR)

CEQA requires only that inconsistencies with general plan goals and policies be identified and discussed (CEQA Guidelines, §§ 15125, subd. [d]). The Draft EIS/EIR does this (please refer to Draft EIS/EIR, pp. 4.2-23 thru -24). Further, Policy 1.K.1 was not adopted as a threshold of significance under CEQA, so it does not dictate a new significant impact finding as to Impact 4.2-1 (Consistency with Federal, State and Local Regulations). Thus, a new significant impact finding is not warranted under CEQA.

The Final EIS/EIR has been updated to further clarify that all alternatives would be, to a certain degree, inconsistent with Placer County General Plan Policy 1.K.1 which states: "The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

- a. Avoids locating structures along ridgelines and steep slopes;
- b. Incorporates design and screening measures to minimize the visibility of structures and graded areas;
- c. Maintains the character and visual quality of the area." (Placer County General Plan, p. 39).

By their very nature, gondolas and ski lifts must extend along steep slopes to achieve their purpose. Given that the gondola is intended to connect the two ski resorts, all three action alternatives must also cross over the ridgeline which separates the two valleys. As such, it is not possible for the gondola to avoid slopes and ridgelines, but rather the design must rely on other means to screen and minimize the visible impacts of the

0022

infrastructure. Specifically the design of each alignment takes advantage of existing topography and vegetation to shield views as well as incorporates design standards via RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3. It is acknowledged that the Alternative 2 alignment traverses a lengthy distance of the sparsely vegetated ridgeline, whereas Alternatives 3 and 4 cross over the ridgeline in one discrete location before diving down into Catch Valley, thus limiting the visible impacts of the Alternative 3 and 4 gondola infrastructure to a greater extent than under Alternative 2. With these design measures in place, all three gondola alignments achieve consistency with the goals and policies of Policy 1.K.1.

0022-6, Visual Resources (VR)

This policy in the Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) is addressed in the EIS/EIR under Impact 4.2-1 for all alternatives. In particular, please refer to page 4.2-24 through 4.2-25 of the Draft EIS/EIR, which indicates that Alternative 2 would not create any inconsistencies with the height restrictions established for buildings in Section 137 of the SVGPLUO. This is because the gondola towers that would exceed the height limit do not fall into the category of the structures that are defined in Section 137 of the SVGPLUO. In particular, the gondola towers would not include exterior walls touching the natural grade and as such are not bound by this restriction.

0022-7, Visual Resources (VR)

The EIS/EIR concludes that potential inconsistencies with management direction provided for designated scenic routes, as designated in the 1977 Placer County General Plan Scenic Highway Element, are not possible because no restrictive management direction can be applied to eligible routes like SR 89. The protections afforded by the California Scenic Highway Program, which directs management of California's designated scenic routes, only apply to officially designated scenic routes.

0022-8, Visual Resources (VR)

Per the definition of the VQO of *Partial Retention* provided in the VMS, management activities (or in this case, infrastructure

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related to operation of the gondola) must remain visually subordinate to the characteristic landscape. Compliance with this Forest Plan designated VQO is determined by whether proposed activities and infrastructure are visually subordinate to the characteristic landscape or visually dominate the original characteristic landscape. Visually dominating activities are consistent with the less restrictive VQO of *Modification*.

Please refer to Section 4.2.2.1 of the Draft EIS/EIR for further information.

0022-8
cont'd

for County residents and a principal asset in the promotion of recreation and tourism" (Placer County 2013)."

- a. The relevant policies intended to carry out this goal include: "maintains the character and visual quality of the area."
- b. The EIS/EIR concludes that "While Alternative 4 would constitute an incremental addition to the built environment in the upslope areas at Alpine Meadows, the presence of gondola infrastructure and Gazex facilities would not dominate the characteristic landscape in these areas and therefore would not constitute an inconsistency..."
- c. Do we have to dominate the landscape with development before we have failed to maintain the character and visual quality of the area?

0022-9

5. Cumulative Impact: The EIS/EIR states: "Visual impacts associated with Alternatives 3 and 4, when combined with General Development in Olympic Valley and Alpine Meadows, would lead to an unsubstantial cumulative impact because Squaw Valley and Alpine Meadows have already experienced considerable ski area development. Similarly, when visual impacts associated with Alternatives 3 and 4 are combined with the White Wolf project, there would be unsubstantial cumulative impacts..."
 - a. This essentially concludes that because we keep approving development, any one development does not substantially impact the area.
 - b. This completely ignores the spirit of the required cumulative impact analysis.
 - c. Placer County and the Forest Service have prepared a 794 page Draft EIS/EIR but failed to recognize what is obvious to the concerned public – that approval of the following projects in the Alpine Meadows/Squaw Valley area will have a material adverse impact on peaceful enjoyment, natural beauty, and ultimately even property values in this area:
 - i. Squaw Village development
 - ii. Gondola Project
 - iii. Alpine Sierra Development
 - iv. Gasex Exploders, which have already created an unsightly view along Alpine Meadows Road
 - v. White Wolf

0022-10

6. The Alpine Meadows General Plan says:

"The *Alpine Meadows General Plan* serves as a master plan for future growth at the ski area. It includes plans for conservation, economics, housing, land use, public buildings, public services and facilities, recreation, and other plans relating to future development of the area. General goals, objectives, and procedures of the *Alpine Meadows General Plan* that are relevant to visual resources in the project area include the following (Placer County 1968): Maintain the open, natural, mountain-recreation character. All aspects of the vast, unique and outstanding physical beauty of the area must be consciously and continuously preserved."

 - a. The EIS/EIR says "While this language does not establish any concrete standards that must be adhered to and instead offers recommendations for maintaining the quality of visual resources at the ski resort, it makes clear that maintenance of the area's stunning visual character is a priority for the managers of Alpine Meadows."
 - b. Unfortunately, the Alpine Meadows General Plan is not referenced again in the EIS/EIR analysis, presumably because there are not concrete standards.

0022-11

7. The EIS/EIR analyzes 21 viewsheds to evaluate the visual impact.

0022-8 cont'd, Visual Resources (VR)

0022-9, Visual Resources (VR)

The Draft EIS/EIR concludes that there would be an unsubstantial cumulative impact under Alternatives 3 and 4 because visual impacts associated with those alternatives would be considered to constitute an incremental or additive visual impact on the project area, and would not constitute a drastic change to the existing built environment within the project area.

For Alternative 2, however, the cumulative effects analysis in Section 4.2.4.2 states that, "Visual impacts associated with Alternative 2, when combined with the White Wolf project, could lead to an adverse cumulative impact."

The Draft EIS/EIR also concludes that adverse impacts of some magnitude would occur for Alternatives 2, 3 and 4 with regard to Impact 4.2-2: Visual Character. Many of the adverse and significant impacts identified by the comment were disclosed in Section 4.2.3 (Direct and Indirect Environmental Consequences).

0022-10, Visual Resources (VR)

The comment is correct that the Alpine Meadows General Plan was not incorporated further in the effects analysis of Section 4.2, "Visual Resources" because no concrete standards are provided. However, the project's consistency or inconsistency with other relevant planning documents which do contain concrete standards is analyzed in detail for all alternatives within Impact 4.2-1: Consistency with Federal, State, and Local Regulations. Please refer to Impact 4.2-1 for all alternatives for further discussion.

0022-11, Visual Resources (VR)

As stated in Section 4.2.2.1 of the Draft EIS/EIR, the Viewpoint Analysis conducted for this project allowed for a qualitative analysis of the visuals changes anticipated to occur with implementation of any of the action alternatives from a selection of 16 representative locations. The scope of the Viewpoint Analysis is inherently limited in this way, as all locations with potential visibility of the proposed gondola could

0022

not be visually simulated for the purposes of this EIS/EIR; as such, highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers were selected for simulation.

However, viewpoints 3 and 4 (along Chalet Road) are intended to be representative views from the Alpine Meadows subdivision. Please refer to those views in Appendix D of the EIS/EIR for all alternatives to view the anticipated visual impacts of the project for Alpine Meadows residents.

0022-11
cont'd

- a. But the analysis does not include the viewshed of Alpine Meadows residents. How can this not be a highly relevant viewshed?

0022-12

Regarding impact on the GCW area, the EIS/EIR concludes the following regarding the preferred Alternative 4:

"Alternative 4 on its own has the potential to result in a reduction to opportunities for solitude or primitive and unconfined recreation, which is characterized as an adverse effect. When added to this adverse effect, the effects associated with the Caldwell property development discussed above (the potential for an increased likelihood of visitor encounters and visual impacts for users of the National Forest System-GCW) would result in a cumulative adverse effect to opportunities for solitude or primitive and unconfined recreation within the National Forest System-GCW."

Why accept a cumulative adverse effect on the recreation of those who enjoy wilderness areas in favor of slight convenience for a subset of skiers?

0022-13

I recommend that Placer County and the Forest Service find a way to poll the users of Lake Tahoe on this Gondola and to recognize that there are many concerned constituents who simply don't have the time or expertise to study a 794 page Draft EIS/EIR which realistically requires dedicated legal support to review and identify the flaws in the analysis.

0022-14

As a skier at Alpine Meadows and Squaw, a hiker of Five Lakes trail and GCW, a homeowner in Alpine Meadows and a defender of our natural spaces, I ask the County and Forest Service to do the right thing and conclude that Alternative 1 should be the chosen alternative.

Sincerely,
Judy Bruner
judybruner@outlook.com

Mailing Address:
14072 Okanogan Drive
Saratoga, CA 95070

Alpine Meadows Address:
1751 John Scott Trail
Alpine Meadows, CA 96146-9765

0022-11 cont'd, Visual Resources (VR)

0022-12, Recreation (R1)

The goal of the EIS/EIR is to provide clear and data-driven analysis of impacts that could occur to individual resources so that the decisionmakers have the most accurate and up-to-date data with which to make findings and to make a decision regarding approving, conditioning or denying the project.

The question of whether or not the project's adverse effects (NEPA) or significant impacts (CEQA) are worth accepting in light of the project's benefits resides with the respective decisionmakers (i.e., Forest Service Supervisor and Placer County Board of Supervisors) and is not within the purview of the EIS/EIR document.

Please refer to the Draft Record of Decision and the decision provided by the Placer County Board of Supervisors for this project, which provide detailed rationale from the decisionmakers on how the project would or would not meet the project's identified Forest Service purpose and need and CEQA project objectives.

0022-13, NEPA/CEQA Process (NCP)

Both NEPA and CEQA require, and allow for, numerous opportunities for the public to provide comments throughout the environmental review process. These comments help to guide the development of alternatives and the environmental analysis. Such opportunities include the public scoping process which occurs when the notice of intent (under NEPA) and notice of preparation (under CEQA) are published, formal public comment period after the release of the draft environmental document, as well as public hearings. These public input processes are described in detail in Chapter 6, "Consultation and Coordination," of the Draft EIS/EIR. The Executive Summary provides a summary of the document, including a brief overview of the project, alternatives, and the results of the environmental analysis. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

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0022-14, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0023

Will Hollo

From: Bryce Thayer <thayerbryce@gmail.com>
Sent: Friday, May 18, 2018 2:35 PM
To: Scoping Comments
Subject: California Express Gondola

0023-1 | This is such a great idea! Please make this happen! I know that Squaw Valley and everyone involved has the ability to do this in a way that respects nature, please make this a reality

Thanks

Jonathan
Bryce
Thayer

(352) 427-1822

0023-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0024

Date submitted (Pacific Standard Time): 6/11/2018 10:43:08 PM

First name: Laurie

Last name: Buffington

Organization:

Title:

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Email: lauriebuff@hotmail.com

Phone: 5304120849

Comments:

0024-1

I would like to express my strong support for Alternative 1, the No Action Alternative for the Squaw Valley to Alpine Meadows Base to Base Gondola. As a frequent user of the Five Lakes Trail and the Granite Chief Wilderness Area in the Five Lakes basin, I find that Alternative 2, 3 and 4 would each adversely affect the dispersed recreation experience to an unacceptable degree. The possibility of Alternative 2 is especially alarming because it "would change the visual characteristics of the scenery surrounding the Five Lakes Trail, resulting in a long-term impact to the recreation experience". The eastern most lake in the Five Lakes Basin (which is a gorgeous place that provides a very special and unspoiled wilderness experience) and what is now named Barstool Lake, would be especially impacted by Alternative 2 as "gondola infrastructure would be particularly noticeable along the high ridgeline that separates that Caldwell property from the National Forest System- GCW".

Living full time in Alpine Meadows for over 30 years has allowed me to develop a very strong connection to the Granite Chief Wilderness Area and to frequently enjoy "the experience of remoteness and primitiveness" that this beautiful and unspoiled area provides.

0024-2

Although I am an avid skier, the benefits of the Base to Base Gondola project in Alternative 2,3 or 4 do not come close to justifying the adverse affects that the project would have on the Granite Chief Wilderness Area. I am concerned for the water quality, wildlife, and vegetation in the area and I urge The US Forest Service and Placer County to fully support Alternative 1, the No Action Alternative to this project in order to protect the special wilderness quality of this gorgeous natural, unspoiled area.

Thank you for respecting and maintaining the special wilderness designation that the Granite Chief Wilderness Area enjoys by not approving the Base to Base Gondola.

0024-1, Other (O2)

Impacts related to the wilderness and recreation/trails are addressed in Sections 4.3, "Wilderness," and 4.1, "Recreation," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0024-2, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

It is also important to note that none of the proposed gondola alignments would traverse the National Forest System-Granite Chief Wilderness (GCW). While the gondola would cross through a portion of the congressionally mapped GCW under Alternative 2, it would cross only through private lands located within the congressionally mapped GCW (in particular, through a 54.6-acre portion of the privately owned Caldwell property). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, these land use restriction do not apply on private lands. Please refer to Section 4.3, "Wilderness" of the Final EIS/EIR for further information.

0025

0025-1, Opinion (O1)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Troy Caldwell

P.O. Box 1784

Tahoe city, Ca. 96145

Heather Beckman

Placer County Planning Service Division

775 North Lake Boulevard

Tahoe City, Ca. 96145

Dear Ms. Beckman,

0025-1

Thank you for the opportunity to comment on the Squaw Valley Alpine Meadows Base-to Base Gondola project DEIR.

This is to reinforce the conclusions for the use of the gasex for the project Health and Safety.

In clarification of the 105mm Howitzer military weapon shrapnel, more than just rock fragments are produced from the impact. The projectile explodes into many pieces of razor sharp metal and have been found up to one half mile from the target zone. As a military weapon these shrapnel pieces can cause severe injuries and or death. The elimination of as many of these shots as possible, from my point of view, not only protects the Gondola system but the people in or around the area in the time of the shooting.

Sincerely,



Troy Caldwell

0026

Shirlee Herrington

From: Tom Carter <tfcarter@gmail.com>
Sent: Sunday, June 10, 2018 8:59 AM
To: Placer County Environmental Coordination Services
Subject: Gondola comments

Environmental Coordination Services,

0026-1

Please do not approve the SquawAlpine gondola plan.

The proximity to The Granite Chief Wilderness should be cause enough to scrap the proposal. Limit this type of development. It is not the path we should take. Let's be reasonable and preserve whatever we can of the unique mountain environment.

Cheers,

Tom Carter

0026-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0027

0027-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project. Potential impacts related to traffic and visual resources are addressed in Sections 4.7, "Transportation and Circulation," and 4.2, "Visual Resources," of the Draft EIS/EIR. In particular, the traffic analysis in the Draft EIS/EIR includes an analysis of parking and changes in traffic patterns and parking use between Alpine Meadows and Squaw Valley with implementation of the proposed Gondola. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Date submitted (Pacific Standard Time): 6/6/2018 9:46:05 AM

First name: John

Last name: Casaudoumecq

Organization:

Title:

Official Representative/Member Indicator:

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Phone: 646-258-9832

Comments:

My family and I enjoy skiing at Alpine Meadows and Squaw Valley. We also enjoy hiking in the area of both. We think the owners, to date, have done a good job improving upon what they purchased. We do not believe the benefits of a village to lodge connection come even close to what will be lost after it is made. It creates an eyesore through an important and beautiful area. It creates the opportunity to use Alpine Meadows as a parking area for Squaw Valley through the busy periods of the winter season, without considering the risks. We like things as they are and hope that the USFS leaves them that way.

0028**0028-1, Opinion (O1)**

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0028-1

Date submitted (Pacific Standard Time): 6/11/2018 3:31:55 PM

First name: Madona

Last name: Casini

Organization:

Title:

Official Representative/Member Indicator:

Address1: 926 Country Club Dr

Address2:

City: Tahoe City

State: CA

Province/Region:

Zip/Postal Code: 96145

Country: United States

Email: Madona@casini.us

Phone: 530-386-6112

Comments:

This land is a sanctuary for many, a place to escape. Please do not build a gondola around or any where near. The human footprint is by far the biggest problem we face for ruining special sacred places left like this. Make the right decision based on what is best for the environment and not business. Our future depends on it.

0029

Date submitted (Pacific Standard Time): 6/5/2018 3:41:53 PM

First name: Sharla

Last name: Chador

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1329 Pine Trail

Address2: PO Box 2212

City: Olympic Valley

State: CA

Province/Region: CA

Zip/Postal Code: 96146

Country: United States

Email: menlovechador@gmail.com

Phone: 7072920929

Comments:

U.S. Forest Service, Tahoe National Forest, Truckee Ranger District, NEPA Contractor,

0029-1

Thank you for the opportunity to comment on this very important issue. I am a homeowner and full time resident of Alpine Meadows for the last 13 years. Over the years my family and I have hiked the Five Lakes trail and accessed Granite Chief Wilderness every single month of the year, on January 1, and on the 4th of July, depending on the snow pack. I have hiked this trail easily a thousand times, just as I did today. Were you in one of the helicopters flying the gondola line between Squaw and Alpine today, June 5th? If you ?so?, maybe you saw me, on the trail below.

I love this trail. I am not alone. You have a solid understanding of the vast number of people who make the strenuous climb to Five Lakes in hopes of ?experiencing? the? wild? freedom and connection? to nature ?that society has helped us lose. Please don't take this from us, from our children, and? from? future generations?, we need it now more than ever.?

0029-2

??T?he stunning landscape in the photo attached is? the site of the proposed gondola's mid-way station?, can you imagine? Even the project's most environmentally superior route would have 33 adverse environmental impacts on important Tahoe values; including traffic, loss of wildlife habitat, and destruction of the unique Sierra experience the Forest Service calls "solitude or primitive unconfined recreation." In addition, residents would be subjected to? additional? deafening gasex explosions. ?A?sk yourself for what??

In the words of Albert Einstein, Look deep into nature, and then you will understand everything better. ???If you have experienced this area on foot, you know it is soul stirring, a respite from the noise, a calming connection. Don't allow it to be destroyed.

Respectfully,
Sharla Menlove Chador
Alpine Meadows Resident

0029-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0029-2, Opinion (O1)

The comment notes that the environmentally superior alternative (Alternative 4) would have 33 adverse environmental impacts. Table 2-3 in the Draft EIS/EIR summarizes the impacts of all the alternatives, and the comment is correct in that Alternative 4 would result in 33 NEPA conclusions of adverse effect, as shown in this table. However, many of the CEQA conclusions for the same impacts are less than significant with mitigation, meaning that these impacts can be reduced below thresholds of significance with implementation of mitigation measures identified in the Draft EIS/EIR. In fact, the only significant and unavoidable impacts associated with the project include impacts to visual resources (Impact 4.2-2), impacts on vehicular queuing at Caltrans intersections (Impact 4.7-4), cumulative traffic impacts (Impacts 4.7-11 through 4.7-13) and construction noise impacts (Impact 4.9-1); these are summarized in Section 5.2.1, "Significant Environmental Effects that cannot be Avoided," of the Draft EIS/EIR.

The Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0030

G. Braiden Chadwick
 bchadwick@mittchadwick.com
 916-462-8886
 916-788-0290 Fax

June 11, 2018

VIA U.S. MAIL AND ELECTRONIC MAIL

Placer County Community Development Resources Agency
 3091 County Center Drive, Suite 190
 Auburn, CA 95603
 Attention: Shirlee Herrington, Environmental Coordination Services
 Email: cdraecs@placer.ca.gov

Re: Comments on the Squaw Valley Alpine Meadows Base-to-Base Gondola Project DEIR

Dear Ms. Beckman:

0030-1 | My client, Troy Caldwell, appreciates the opportunity to comment on the April 2018 Draft Environmental Impact Report ("DEIR") prepared for the Squaw Valley Alpine Meadows Base-to-Base Gondola Project ("B2B Project"), pursuant to the California Environmental Quality Act ("CEQA"). Mr. Caldwell strongly supports the B2B Project and believes it will be a positive amenity for the community. The information provided below is intended to clarify and correct certain information contained in the DEIR regarding Mr. Caldwell's property.

0030-2 | As noted in the DEIR Environmental Setting section on page 4.1-1, Mr. Caldwell owns private property bordered on one side by Squaw Valley and on the other side by Alpine Meadows (the "Caldwell Property"). The Caldwell Property holding is 460 acres, which should be reflected in Table 3-3 on page 3-14 of the DEIR. While addressed in the DEIR, we also reiterate that Mr. Caldwell's property is private property and is not part of the Granite Chief Wilderness Area ("GCWA").

0030-3 | In sum, the Wilderness Act of 1964 (the "Wilderness Act") does not extend, and has never extended, to private property. The California Wilderness Act of 1984 (the "California Act") was passed along with 116 other subsequent laws designating wilderness around the country. While the California Act boundary lines included private lands, these private lands were only proposed for purchase at the time they were drawn and were never included in the wilderness designation. This "potential purchase line" encompassed approximately 60 acres of the Caldwell Property. Importantly, the Wilderness Acts do not impose wilderness restrictions on private property, nor do they impose any land-use restrictions where a private individual is unwilling to sell. Therefore, as outlined below, the GCWA does not include Mr. Caldwell's private property.

{00034551;4 }

0030-1, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

0030-2, Wilderness (W2)

Table 3-3 has been updated to note that the size of the Caldwell Property is 460 acres.

0030-3, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness" as it pertains to legislation related to wilderness designation. No further response is provided.

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Page 2

0030-4, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness" as it pertains to the significance of wilderness designation on private lands contained within or adjacent to designated wilderness areas. No further response is provided.

0030-4

I. The Wilderness Act and the California Wilderness Act do not Apply on Private Property

The Wilderness Act and the California Act do not impose wilderness-area designation or land-use limitations on privately-owned property, including the Caldwell Property. When designating wilderness areas, Congress was scrupulous in protecting the rights of private property owners within mapped wilderness boundaries. A portion of the Caldwell Property is included within the mapped boundary of the GCWA as shown in the map on page 1-6 of the DEIR; however, that does not make the Caldwell Property wilderness or preclude any proposed private uses on the property.

A. The Wilderness Act applies only to federal lands.

The Wilderness Act explicitly states that its land-use restrictions only apply to publicly-owned *federal lands*. Specifically, the Wilderness Act provides that:

[T]here is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by the Congress...no Federal lands shall be designated as 'wilderness areas' except as provided for in this chapter or by a subsequent Act.¹

The Wilderness Act defines "wilderness area" as "an area of undeveloped federal land retaining its primeval character and influence."² Thus, the Wilderness Act only applies to federal lands designated as wilderness areas. Since the Caldwell property is neither, the Wilderness Act does not apply to it.

Privately-owned parcels within designated wilderness areas are not subject to the land-use constraints of the Wilderness Act.³ Instead, the Secretary of Agriculture ("Secretary") is authorized to acquire those lands to include within the wilderness area, but only if the land owner agreed.⁴ Unless the private land is conveyed to the United States, landowners retain all of their property and development rights.⁵

B. The California Act is also limited to federal lands.

Congress, in establishing the GCWA, designated certain lands within the Tahoe National Forest. The National Forest is comprised of federal land reserved for national forest purposes but similar to the Wilderness Act, does not extend to private land. As with its counterpart, the California Act

¹ 16 U.S.C. § 1131(a).

² 16 U.S.C. § 1131(a), underline added.

³ 16 U.S.C. § 1134.

⁴ 16 U.S.C. § 1134(c).

⁵ 16 U.S.C. § 1134 (a) & (b).

{00034551;4 }

0030

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Page 3

0030-4
cont'd

guaranteed inholding owners rights of ingress and egress to access their properties, authorized the Secretary to negotiate for acquisition of private properties from willing sellers, and provides for the purchase of privately-owned lands with the concurrence of the owner.⁶

The Department of Agriculture's Roadless Area Review and Evaluation of 1979 ("RARE II") confirms that the California Act did not intend to extend the land-use constraints of the Wilderness Act to private lands. RARE II was the process by which the wilderness areas were identified and designated. The Final Environmental Statement issued as part of the RARE II process confirmed that "non-Federal lands included within the boundaries of an area classified as wilderness are not themselves classified . . . Wilderness designation in itself imposes no restrictions on use of the private lands within or adjacent to wilderness."⁷ The location of Mr. Caldwell's private property adjacent to GCWA, by itself, does not impose any land-use restrictions.

II. The Mapped Wilderness Designation Area is Inaccurate

0030-5

In enacting the California Act, Congress mapped out wilderness designation areas and specifically drew the boundaries to include private property that it thought the Secretary might eventually acquire. At the time that Mr. Caldwell purchased the Caldwell Property in 1989, the Secretary made an offer to purchase a portion of his property in the pre-drawn "designation area." However, Mr. Caldwell was not a willing seller, and thus the property remained private.

Following Mr. Caldwell's refusal to sell his property, and the three-year⁸ allowance in the California Act to purchase private property, Congress never enacted legislation to change the map of GCWA to accurately reflect the wilderness lands. The current map still includes the "potential purchase line" extending approximately 60 acres onto the Caldwell Property as shown in the map on page 1-6 of the DEIR. Thus, the boundary line as currently drawn exists only as a legal fiction since it is located on Mr. Caldwell's private property. While the Caldwell Property is within the boundary, it is not wilderness, and is not managed as wilderness. To be clear, the existence of a wilderness boundary line on adjacent private lands does not provide for protection or management of those private lands as wilderness. To truly designate land as wilderness, the federal government must own the land.

Furthermore, Congress did not intend for the Wilderness Act to create protective perimeters or buffer zones around each wilderness area. Non-wilderness activities are not precluded up to the

⁶ Pub.L.No. 98-425 § 103(a) & (c) (wilderness areas are to be administered pursuant to the Wilderness Act, which preserves the right of ingress and egress to private inholdings at 16 U.S.C § 1134(a)) (both the Act and California Act require that the owner of a privately-held parcel must agree to the transfer, thereby precluding exercise of eminent domain)).

⁷ Final Environmental Statement 78-04, RARE II (January, 1979) at p. 73, underline added.

⁸ Pub.L.No. 98-425 § 103(c) (Such exchange shall to the maximum extent practicable be completed within three years after the date of enactment of this title).

{00034551;4 }

0030-4 cont'd, Wilderness (W2)

0030-5, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness," as it pertains to the discussion of development buffer zones around designated wilderness areas. In particular, many wilderness bills enacted after the Wilderness Act of 1964 prohibit the establishment of development buffer zones around designated wilderness areas (please refer to Section 4.3, "Wilderness," for further information). No further response is provided.

0030

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cont'd

boundary of the wilderness area. Congressional intent on the matter is further shown through language in the California Desert Protection Act: "Congress does not intend for the designation of wilderness areas ... to lead to the creation of protective perimeters or buffer zones around any such wilderness area."⁹ The GCWA "potential purchase line" on Mr. Caldwell's property, or on the boundary between the Caldwell Property and federal land, does not create any sort of buffer.

III. The GCWA Line Located on the Caldwell Property is not Precise

0030-6

Finally, a legal description and boundary map were prepared for the GCWA in the mid 1980's. The metes and bounds of the legal description were not included; and, it appears that the legal description was prepared from line work overlaid on a United States Geological Survey Quadrangle Map, and not based upon a field survey. The "potential purchase line" on the accompanying map is approximately 250 feet wide due to the large scale of the map and the thick line drafted. The thickness of the line can be seen in Exhibits 2-4 and 2-5 on pages 2-7 and 2-8 of the DEIR. Presumably, a more accurate map and legal description would have been prepared for purchase of the private property. These factors further emphasize that the Caldwell Property is not subject to the management and land-use restrictions of the GCWA.

We understand that the County is concerned about accuracy and properly depicting the boundaries of the GCWA. As explained herein, the wilderness line depicted on the Caldwell Property is misleading since wilderness designations do not extend to private property. (See DEIR Exhibit 4.3-1.) Thus, the line should be removed from depictions of the Caldwell Property in the DEIR. However, if the County insists on including the misleading wilderness line on the Caldwell Property, then the County must include notations that make the delineation of the true wilderness boundary obvious in its map exhibits.

Best regards,

MITCHELL CHADWICK LLP



G. Braiden Chadwick

cc: Troy Caldwell

⁹ Pub.L. 103-433 § 103.

{00034551;4 }

0030-5 cont'd, Wilderness (W2)

0030-6, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness," as it pertains to discussion of the fact that the Caldwell property is privately owned and therefore not subject to the management and land use restrictions of imposed by the Wilderness Act of 1964.

Adequate analysis of impacts that may occur to the National Forest System-GCW necessitate that the line identified by the comment (i.e., the "potential purchase line" that distinguishes the National Forest System-GCW from the private lands within the congressionally mapped GCW) be included in all depictions of the Caldwell property contained within the Final EIS/EIR. It is important that these lands be clearly distinguished from National Forest System-GCW lands in this analysis so that proper historical context can be provided regarding the evolution of land use management in the area.

No further response is provided.

0031

Will Hollo

From: Justin Chatten-Brown <justincb@gmail.com>
Sent: Friday, May 18, 2018 1:01 PM
To: Scoping Comments
Subject: California Express Gondola

Dear USFS/Placer County:

0031-1 | I support the California Express Gondola because I think it will significantly decrease the traffic and environmental impact for those wishing to move between Squaw and Alpine Meadows.

Thanks for your time,

Justin

Justin Chatten-Brown, MD
Justincb@gmail.com

0031-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0033

Shirlee Herrington

From: dropbox <dropbox@cornew.com>
Sent: Monday, May 21, 2018 8:41 AM
To: Placer County Environmental Coordination Services
Subject: Support for Squaw Valley California Express

Dear Forest Service and Placer County:

0033-1 | Please approve the Squaw Valley California Express project.

Not only will it improve the skiing experience, it will have a minimal negative effect on the environment, but will help with traffic and with the viability of the business' in the area. An underutilized ski resort is of greater per capita impact than a properly operated efficient destination.

Thank you,

Dan Cornew
410 Indian Trail
Olympic Valley, CA. 96146

0033-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0034**Shirlee Herrington**

From: Ken Crawford <fish1phish2@yahoo.com>
Sent: Tuesday, May 22, 2018 11:12 AM
To: Placer County Environmental Coordination Services
Subject: Gondola protest at SquawAlpine

0034-1 | I support the Gondola project. Currently the area uses 3 busses moving 6 times an hour; maybe moving as little as 3 customers or 150 depending on business. These busses use a tremendous amount of fuel creating lots of CO2. They also can sit idle in traffic for over an hour on busy days. I think people would prefer a nice scenic ride between the ares over sitting in traffic. with Please approve the project with one of the 3 alternatives.
Ken Crawford
Tahoma.

0034-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0035

Will Hollo

From: Chance Cutrano <ccutrano@gmail.com>
Sent: Monday, June 11, 2018 4:50 PM
To: Scoping Comments
Cc: cdraecs@placer.ca.gov
Subject: Draft EIS/EIS Comments for Squaw-Alpine Gondola

Greetings,

These comments are intended to inform the USFS and Placer County in their environmental review of all proposed alternatives for the Squaw-Alpine Gondola Proposal. I am not a Tahoe resident, but I do take numerous trips to Tahoe annually. As part of this ritual retreat to North Lake Tahoe, I spend several days in the untrammelled wilderness of Granite Chief and Five Lakes. I've been fortunate enough to camp with friends and loved ones up near Five Lakes, watching the miraculous cotton candy-colored sunsets and star-gazing until the warm granite lulls me to sleep.



0035-1, Other (O2)

The issues identified in the comment are addressed in the Draft EIS/EIR in Sections 4.2, "Visual Resources," 4.3, "Wilderness," 4.14, "Wildlife and Aquatics," and 4.15, "Wetlands." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0035-2, Other (O2)

The potential environmental impacts of Alternatives 2, 3, and 4 are summarized in Tables ES-3 and 2-3 in the Draft EIS/EIR. While the project would result in impacts to the GCW (as described in Section 4.3, "Wilderness"), it would not result in 33 impacts to the GCW as stated in the comment, but rather would result in 33 impacts across numerous resource areas, of which wilderness is one. Other issues identified by the commenter, including impacts on Sierra Nevada yellow-legged frog, traffic impacts (including VMT generation), and air quality, are addressed in Sections 4.14, "Wildlife and Aquatics," 4.7, "Transportation and Circulation," and 4.10, "Air Quality," respectively, in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment.

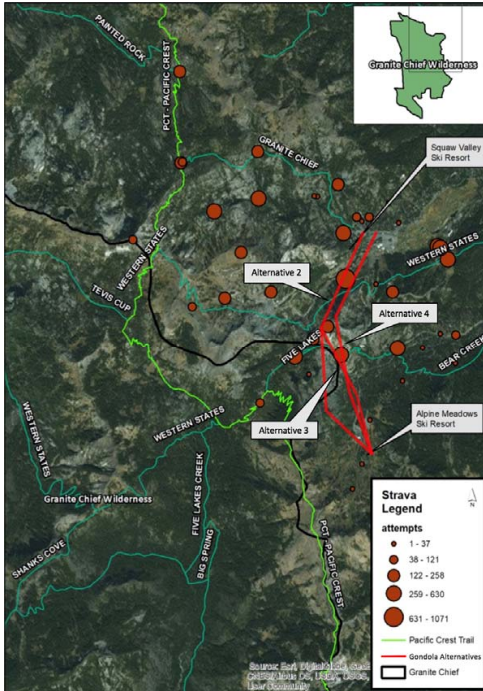
0035-1 I can't help but picture a landscape polluted with cable cars, metal wire ropes, and "exploders" when I hear about the plans proposed by KSL. These protected and legislatively designated wildlands are not part of some carnival, and therefore need not be scarred with a gondola, a carousel, a Ferris wheel, or any other tourist gimmick. I am wholeheartedly opposed to the wrong-headed effort to build out a gondola from Squaw Valley to Alpine Meadows. I believe this encroachment on the tranquility of our wild public land is a detriment to wildlife, the character of the region, and visitor experience.

0035-2 It is my understanding that even the preferred alternative would cause 33 negative/adverse impacts to the greater Granite Chief Wilderness. Among these, I am most concerned about impacts on the endangered Sierra Yellow-Legged Frog, but also the long-term ramifications caused by new noise and air pollution. Studies have shown that traffic congestion is likely to increase due to this proposed development. Even if vehicles are to become more energy efficient over the next decade, how could Placer or the USFS support a project that will increase Vehicle-Miles-Traveled and Scope 3 Emissions for these ski resorts? The picture of 430+ more vehicles on those roads during busy weekend days is

0035

0035-2 | worrisome. Supporting such projects will not keep Tahoe Blue, it will perpetuate unsustainable (and unfashionable) growth in direct conflict with the goals of TRPA.

0035-3 | Additionally, I'm gravely concerned about the alternatives provided by the USFS and Placer. No alternative can rectify the obscene number of issues this base-to-base gondola will provide. For instance, a recent study conducted by researchers at Presidio Graduate School used social media sites to map visitation and use patterns in Granite Chief Wilderness. After controlling for non-PCT and non-event visitors, the map below, containing the proposed alternatives overlaid on top of the Strava visitation and use data (from the study conducted by Presidio students), shows that all alternatives will cause adverse impacts to individuals visiting Granite Chief Wilderness and particularly Five Lakes.



0035-4 | Finally, the originally proposed route proposed by KSL was found to be the most environmentally damaging route. How can Placer County and the USFS have faith that this corporation will operate in the best interest of the people of Tahoe, the American public that own Granite Chief Wilderness, or the land itself when their first proposal was so carelessly harmful to this unique and delicate ecosystem?

Please allow the American people the solitude and tranquility we were promised when we entrusted the USFS to manage and protect the greater Granite Chief Wilderness.

Chance Cutrano
Fairfax, CA 94930

0035-2 cont'd, Other (O2)

0035-3, Wilderness (W2)

Impacts related to the GCW and the Five Lakes Trail are addressed in Sections 4.3, "Wilderness," and 4.1, "Recreation," respectively, in the Draft EIS/EIR. These sections evaluate in considerable detail the impacts that would be anticipated to occur for individuals visiting the GCW and/or Five Lakes (which appears to be the commenter's concern in referencing the recent Presidio Graduate School study).

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0035-4, Opinion (O1)

The purpose of the Draft EIS/EIR is to identify the potentially significant impacts of the project, and develop alternatives and mitigation measures that would reduce and/or avoid those impacts. Over the course of project planning, multiple field surveys were conducted (including focused biological surveys, cultural surveys, and noise measurements) and studies performed (including visual simulations, traffic studies, and air quality and greenhouse gas emissions modeling), the results of which led to the refinement of the project, development of alternatives studied, and the identification of Resource Protection Measures (i.e., mitigation measures). Based on the analysis of these data, it was determined that Alternative 2 would have several different, or more severe, environmental effects than Alternatives 3 and 4 (see pages ES-8 and ES-9 of the Draft EIS/EIR), and Alternative 4 was identified as the Environmentally Superior Alternative under CEQA, demonstrating that the environmental process was followed and has been effective.

The Forest Service and Placer County decision-makers will review and consider the environmental analysis as well as public comments received during the environmental process when making a decision regarding the project. As part of the County's project approval process, the project applicant would be required to adhere to various conditions of approval that are monitored by the County through a variety of permit processes as listed below.

0035

Development Review Committee Improvements Plan Approval
Improvements Construction Inspection Encroachment Permit
Final Map Recordation Acceptance of Project as Complete
Building Permit Approval

Further, the project applicant would be required to implement RPMs and mitigation measures included in the project's Mitigation Monitoring and Reporting Program (Appendix I to the Final EIS/EIR). Responsibility for ensuring that required RPMs and mitigation measures are implemented rests with the Forest Service and Placer County.

0036**Will Hollo**

From: Warren Davis <warrenkdavis@gmail.com>
Sent: Friday, May 18, 2018 2:30 PM
To: Scoping Comments
Subject: CA Express

0036-1 | I am full in favor of this tram. It is not really wilderness to any true mountain person. In spite of the often disingenuous information from Squaw's management, I think this project should go forward.

Warren K. Davis
Truckee CA

0036-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0037

0037-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. It is unclear what study is being referred to in the comment as the Forest Service has not conducted a study comparing the environmental impacts of the project to potential profits generated by the project. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Date submitted (Pacific Standard Time): 5/15/2018 1:59:43 AM

First name: David

Last name: Doherty

Organization:

Title:

Official Representative/Member Indicator:

Address1: 11280 Star Pine Rd.

Address2: 11280 Star Pine Rd.

City: Truckee

State:

Province/Region: California

Zip/Postal Code: 96161

Country: United States

Email: soulskis@gmail.com

Phone: 5305836300

Comments:

I am against the proposed gondola project between Squaw Valley and Alpine Meadows. I am in agreement with the Forest Service study that the negative environmental impacts far outweigh any potential profits for Squaw Valley. Perhaps the 50 million investment for this gondola would be better spent on public transportation and reducing the detrimental effects of tourism.

0060

Will Hollo

From: Judi Gentry <judi.haven.gentry@gmail.com>
Sent: Tuesday, June 19, 2018 1:08 PM
To: Scoping Comments
Subject: Proposed Squaw Alpine net gondola

0060-1

My name is Judi Haven Gentry and I have been a Squaw Valley and Alpine resident since 1969!

I taught skiing for the Squaw Valley Ski School a long time ago and have hiked the Sierras in summer ever since. My favorite trail is the Five Lakes Trail that goes through the granite Chief Wilderness. I find it absolutely appalling that this area which has been designated Wilderness for us to enjoy is now compromised by a big-money development. It actually makes me sick when I hike the Five Lakes Trail to think of development going in on our most beloved area of the Wilderness. It is so easily accessible to residents of Alpine and to many many people who enjoy it from all over the world. It's a rare Jewel to be able to hike up to the lakes and sit there in total peace.

Now, once again, the big developers are trying to destroy an area we hold dear. We absolutely should not let them get away with it. When I was hiking the Five Lakes Trail last summer a helicopter flew over my head on the way to pick up a big load at the squaw side. It came back and flew with a huge load of something very heavy and the cable snapped as I was videoing the helicopter and it dropped the load not far from the Five Lakes Trail. Of course it could have killed me or anybody else on the trail but it dropped it in the forest just a few hundred feet from the trail. I still have the video. I also sent a copy of the video to the Sierra Watch people.

I respect their work so much but it is a little like a David and Goliath situation. The Sierra Watch people are fighting an almost unstoppable force of the big money corporation which has taken over our beloved Alpine Meadows and Squaw Valley ski resorts. That big corporation is also trying to destroy Squaw Valley by putting a huge building there with a water slide and rafting river INSIDE the enormous building!! We have the Truckee River we don't need a water slide! They should be stopped.

They are just trying to make more money in the summer season. But the impact would be huge.

This area between Truckee and Tahoe City should be preserved. It's very precious. The residents do not want a four-lane freeway going from Truckee to Squaw and that's about what it would take to handle all the extra traffic going to some kind of a Disneyland in Squaw. The Planning Commission has not been vigilant and has passed illegal measures without honestly considering the huge and damaging impact it would have on the area. Traffic is very congested now in ski season and on all holidays. The development would increase our traffic problem exponentially.

But in this letter, I am pleading with the Forest Service to do everything in its power to block the violation of the Granite Chief Wilderness area.

Thanks so much for being a protector of our wilderness areas.

Judi

Judi Haven Gentry
 415 317-0400

0060-1, Opinion (O1)

Impacts to the Granite Chief Wilderness area and the Five Lakes Trail are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR. Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment.

The comment is directed towards the project approval process. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Will Hollo

From: Bill Downs <billdowns200@yahoo.com>
Sent: Saturday, May 12, 2018 1:05 PM
To: Scoping Comments
Subject: California Express Gondola

Dear USFS

0039-1 | I support the California Express Gondola because it enhances responsible use of public & private lands. As with many locals, I would like to ski Alpine Meadows more, but it's currently not that easy.

In the last 2 years, I've skied over 90 days at Squaw, but only 3 days at Alpine Meadows because it takes too long for me to get there and back. I live full time in Olympic Valley and have all of my stuff at Squaw. Getting to Alpine on the shuttle takes at least 40 minutes longer (from standing in front of the Funitel to standing in front of Summit). It's even worse when there's bad traffic or the shuttle is late or is full (@ 4:00). If I wanted to commute over an hour a day, I would have stayed in the Bay Area.

Let's let the people use their land.

Bill Downs

Sandy Way

Olympic Valley

0039-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0040**Will Hollo**

From: Bill Downs <billdowns200@yahoo.com>
Sent: Saturday, June 9, 2018 4:31 PM
To: Scoping Comments
Subject: Gondola Comments

0040-1

It would be great to ski Granite Chief and Sherwood in the same afternoon. Driving between the two mountains does not make sense. Please make it easier to enjoy our National Forests and approve the gondola.

William Downs
Olympic Valley

0040-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0041

0041-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Date submitted (Pacific Standard Time): 5/12/2018 12:06:49 PM

First name: William

Last name: Downs

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1261 Sandy Way

Address2:

City: Olympic Valley

State: CA

Province/Region: William Downs

Zip/Postal Code: 96146-3248

Country: United States

Email: billdowns200@yahoo.com

Phone: 6502707414

Comments:

Dear USFS

I support the California Express Gondola because it enhances responsible use of public & private lands. As with many locals, I would like to ski Alpine Meadows more, but it's currently not that easy.

In the last 2 years, I've skied over 90 days at Squaw, but only 3 days at Alpine Meadows because it takes too long for me to get there and back. I live full time in Olympic Valley and have all of my stuff at Squaw. Getting to Alpine on the shuttle takes at least 40 minutes longer (from standing in front of the Funitel to standing in front of Summit). It's even worse when there's bad traffic or the shuttle is late or is full (@ 4:00). If I wanted to commute over an hour a day, I would have stayed in the Bay Area.

Let's let the people use their land.

0042

Shirlee Herrington

From: Theresa May Duggan <teemayduggan@gmail.com>
Sent: Thursday, June 07, 2018 5:25 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: Comments for EIR/EIS for Squaw Valley Gondola

Dear Friends,

Re: EIR/EIS: Squaw Valley|Alpine Meadows Gondola

0042-1

I would like to express my thanks for your work on the this EIR/EIS. I attended several, if not all, of the public meetings held by the USFS and Placer County. I am satisfied the process has been credible. It has been open, transparent, informed, interactive and inclusive. I believe the two agencies were committed to an honest process and I believe that has been achieved.

I read technical documents and often find them wordy and obtuse, not easy for a lay person to understand. I have to sing your praises for the work done in the Executive Summary. (<https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/squawvalleygondolaproject>) I found the summary understandable, clearly written and without bias.

First, I was impressed with the clarity of the objectives of the project.

From your document **ES.1.2.2 CEQA PROJECT OBJECTIVES:**

The project has the following objectives:

1. *Enhance the visitor experience at Squaw Valley and Alpine Meadows by providing easy, and potentially faster, interresort access to terrain and amenities at both ski areas.*
2. *Reduce visitor and resort shuttle system travel on roadways between the resorts.*
3. *Provide opportunities for skiers to offload at mid-stations to provide easier access to existing skiable terrain.*
4. *Provide a system where the gondola segment between the Squaw Valley base terminal and mid-station can operate independently from the remainder of the gondola so that this segment can potentially function as a ski lift if the remainder of the gondola is not operational because of weather, maintenance, or other factors.*
5. *Use a facility alignment that allows vehicles and equipment to reach gondola cabins from the ground to evacuate people from the cabins, if necessary, during an emergency situation.*
6. *Improve the efficiency and safety of the existing avalanche hazard mitigation program at Alpine Meadows that relies on explosives by adding an effective, alternative avalanche mitigation technology.*

After reading the objectives, I believe the correct conclusion is found:

*Therefore, overall, Alternative 4 is determined to have less of an adverse environmental effect compared to Alternative 3, and is considered to be the **environmentally superior alternative**. (Emphasis added)*

0042-1, Opinion (O1)

The comment recommends preparation and implementation of a traffic management plan to manage traffic along Squaw Valley Road, which is already included as Mitigation Measures 4.7-2 (for Squaw Valley Road and intersecting roadways) and 4.7-8 (for construction traffic) in the Draft EIS/EIR and required to be implemented by the project applicant.

The remainder of the comment provides an opinion regarding the merits or qualities of the project. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0042-1
cont'd

I support Alt 4 as the superior choice for the Gondola. I urge the USFS to jump on board Placer County's assessment.

Additionally, I would also like to say the **Table ES-3 Summary of Resource Topics with Impacts and RPMs and/or Mitigation Measures** is one of the best charts I've seen explaining the complexities of the required mitigation. I believe the creators of this chart know how to tell information! The issues are clearly defined in the **Resource Topics/Impacts** column and further explained as they relate to both **NEPA and CEQA** and exactly what **Environmental Effects are before Mitigation** are required. The next column clearly explains the **RPMs and/or Mitigation Measures** required/alternative. The final column **Environmental Effects after Mitigation (by Alternative)** again as it relates to **NEPA/CEQA** defines how required mitigation will reduce impacts often to less than significant for my choice: Alternative 4.

I also read the mitigation ideas as an opportunity for the community to weigh in with ideas on how to better improve the project. Like most projects in California, we understand traffic is a significant impact of the project. No one project creates the traffic we have, nor will one project solve the congestion we have. A **Construction Traffic Management Plan** is a start, **Traffic Management along Squaw Valley Road** (and adjacent intersections) is another as are all the other required mitigation measures.

Our traffic congestion is solvable, we must as a region commit to real mass transit solutions. I find Squaw Valley/Alpine Meadows to be a ready, willing and able partner to seek solutions. I urge our community, Placer County and the USFS to work with them to make this Gondola, something I first heard about in 1977 while riding a chair lift in Alpine, a reality. It is long overdue. And importantly, it meets the objectives of the proposal.

Alternative 4 meets the objectives of the project, is the reasonable environmental choice and the major impacts can be mitigation with thoughtful solutions.

Please move this project forward.

Thank you,

Theresa May Duggan

Theresa May Duggan
Community Organizer
PO Box 290
Tahoe Vista, CA 96148
530-546-7903 land line
530-386-0479 mobile
teemayduggan@gmail.com

0042-1 cont'd, Opinion (O1)

0042

0043

RECEIVED

JUN 11 2018

CDRA

Robert J. Durham, Jr.
1750 Village Road East, Unit 5127
Olympic Valley, California 96146
robertdurham@yahoo.com

June 7, 2018

0043-1, Opinion (O1)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Community Development Resource Agency
Environmental Coordination Services
Attention: Shirlee Herrington, Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, California 95631

re: Squaw Valley-Alpine Meadows Base-to-Base Gondola Project

Dear Ms. Herrington:

0043-1

I am a Squaw Valley homeowner and am in favor of the Squaw Valley-Alpine Meadows Base-to-Base Gondola Project. I am in favor of the project even though several Gazex avalanche exploders would need be installed if the project were approved. These devices remove the need for on-the-ground human avalanche control (a dangerous mission for the ski patrol) and are therefore potentially life-saving. While I would hear this equipment from my home, I still support the project.

The project is beneficial to the Squaw Valley-Alpine Meadows community and will reduce traffic vehicular traffic in the region

I believe the Environmental Impact Report ("EIR") provides a comprehensive assessment of the project and that the EIR supports the project.

Sincerely,



Robert J. Durham, Jr.

0044

Will Hollo

From: Chris Egger <christopher.j.egger@gmail.com>
Sent: Monday, June 11, 2018 12:46 AM
To: Scoping Comments
Subject: Squaw Valley Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR Comment

Concerning the proposed Squaw Valley Alpine Meadows Base-to-Base gondola I would like to note the following:

- Unfortunately, I have not had the time to review the 1577-page draft EIS/EIR in depth so please pardon any comments that are at odds with the document or if I fail to reference the location of something in the draft EIS/EIR.
- For reference, I am a life-long Squaw Valley and Alpine Meadows skier (28 years of skiing at the resorts), as well as a frequent (approx.. 1x/week June-September) visitor to the Granite Chief Wilderness, especially the Five Lakes area. In addition, one of my areas of professional research is environmental psychology, concerning how environments affect individuals, with a focus on some of the effects of spending time in natural environments. Proceeding from my work, I tend to be acutely aware of environmental disturbances.
- Concerning the impact of the proposed gondola on the Granite Chief Wilderness and the visitor experience to the wilderness I would like to note that I am adamantly opposed to Alternative 2, as the gondola would cross through the wilderness boundary—which is completely contrary to the idea of wilderness areas (as set forth by Congressional designations). The presence of the gondola on the Caldwell property (Alternatives 3, 4) would, in my professional opinion, in largely subtle ways, detract from the experience of hiking to Five Lakes. Namely, the presence of gondola towers, GazEx devices, overhead cables, additional large structures on nearby ridges, and the occasional (i.e., during maintenance periods) gondola cabins, are all discrepant with the “naturalness” (i.e., minimal presence of man-made objects) of the area. Furthermore, peer-reviewed research (including my own) indicates that (1) these objects are likely to attract the attention of visitors, and (2) this detracts from some of the beneficial effects of spending time in natural places. (I can’t recall if the draft EIS/EIR acknowledges these issues as adverse effects.)
- Concerning the impact of the proposed gondola on the visitor experience within the Squaw Valley resort boundaries, I believe that Alternatives 2, 3 & 4 all would have **adverse impacts that may have not been recognized in the draft EIS/EIR.**
 - Alternatives 2 & 3, with the gondola segment from the Squaw base to Squaw mid-station running on the North-West (i.e., Squaw Creek) side of the ridge which the KT chair roughly parallels (with the KT chair on the South-East side of the ridge) would primarily detract from the skier experience by: (1) Placing gondola towers along the “West Face” (including “West Face Alternates”) and “Chute 75” ski runs, thereby introducing visual and audible disturbances, as well as obstacles in the middle of ski slopes. Currently these runs/slopes occupy a large area within the ski resort that have no built infrastructure. (2) Potentially eliminating some ski runs in this area with the placement of gondola towers. More specifically, some of the “Nose Chutes” may no longer be skiable if towers are placed in the middle of them. (In the Summer of 2017 a GazEx was installed in the middle of another run off of the KT lift, significantly limiting options for skiing the run and introducing a new hazard which a skier may run into.) (3) The Squaw mid-station, would likely (it is difficult to tell based on renderings as to how much) interfere with the flow of skier traffic from the KT chair to the “Saddle” area.
 - Alternative 4 would primarily have an adverse effect on the skier experience insofar as the Squaw mid-station would, based on renderings and size descriptions in the draft EIS/EIR,

1

0044-1, Wilderness (W2)

While the gondola would cross the congressionally mapped Granite Chief Wilderness (GCW), it would cross only private lands located within the congressionally mapped GCW (more specifically, through a portion of the 54.6-acre portion of the privately owned "Caldwell property" that overlaps with the congressionally mapped GCW). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, it does not establish land use restrictions for privately owned lands within congressionally mapped wilderness areas, nor does it establish development buffer zones on the lands surrounding federally owned lands within congressionally mapped wilderness areas. In other words, there are no development restrictions imposed by the congressionally mapped GCW on private lands. Please refer to Section 4.3, "Wilderness" of the Draft EIS/EIR for further information.

Regarding the potential for the presence of the gondola to detract from the experience of hiking to Five Lakes, the Draft EIS/EIR acknowledges that the action alternatives would result in adverse (Alternative 2) or minorly adverse (Alternatives 3 and 4) effects to the dispersed recreation experience on the Five Lakes Trail. For further information, please refer to Section 4.1, "Recreation," of the Draft EIS/EIR (see discussion provided under Impact 4.1-1 for Alternatives 2, 3, and 4). These impacts will be considered by the decision-makers.

0044-2, Alternatives (A)

The Draft EIS/EIR acknowledges that visual and audible disturbances would result from the presence of gondola infrastructure within the existing Squaw Valley ski resort. Given that the resort is already appreciably developed, it was determined that the development would not constitute an appreciable change to the current setting, and therefore was not identified as an adverse or significant impact.

Similarly, placement of gondola towers along Nose Chutes would not eliminate the ski trail. Gondola infrastructure (and in particular, gondola towers) would be strategically located along rocky outcrops or other unskiable terrain to the greatest extent practicable, which would ensure that skier access along the Nose Chutes run would not be obstructed.

0044

The Squaw Valley mid-station under Alternatives 2 and 3 would be positioned on the southeast side of the main KT22 Saddle, so that it would have a minimal impact on the existing skier route from the top of the KT22 Chair to the Saddle area. To mitigate potential impacts on skier flow originating from the Squaw Valley mid-station (which are expected to be negligible), the area of disturbance associated with mid-station would include potential widening of the existing skier route in the vicinity of the mid-station to increase the run's skier capacity. The area of disturbance associated with construction of the Squaw Valley mid-station under Alternative 4 would include terrain grading to improve skier circulation around the top of KT22. When compared with the existing condition, the terrain enhancements would maintain equal or better access to all of the terrain currently served by the KT22 Chair. The terrain enhancements would also create additional flat space in the area of the Squaw Valley mid-station and ski patrol building for expanded milling and/or congregation space. These terrain enhancements would maintain access to all terrain served by the KT22 Chair (or improve access) and would ensure that installation of the gondola would not lead to increased skier traffic (or safety hazards resulting from skier traffic).

0044

0044-2
cont'd

significantly obstruct the flow of ski traffic for a large portion of the KT terrain. I can't tell how this problem would be managed, but it seems that skiers would either be forced to ski around the mid-station, or possibly under the structure. From the skier perspective, these possibilities are undesirable as direct, unobstructed access to slopes from the top of chairlifts is a hallmark feature of Squaw Valley. Personally, as far as I can tell, it seems that my favorite run would be compromised by this mid-station placement. It is also worth noting that restricting the area skiers have to get from the KT chair to the "Saddle" area, as appears would necessarily occur with the placement of the mid-station where depicted, may be problematic insofar as it would create a zone of high skier density, which may lead to collisions and injuries. In other words, there isn't much space at the top of KT right now and skiers tend to congregate near the patrol shack and unloading area—further restricting the available space would seem to be ill-advised as it would certainly make navigating the area more problematic and potentially result in increased injuries.

0044-3

- The **claims** concerning the ability for the gondola to provide additional uphill capacity at Squaw Valley at certain times seem (I am *not* an engineer) to be **unfounded**. More specifically, claims indicating that the Squaw segment could operate during storm conditions when, for example, the upper mountain is closed need to be reconciled with the following facts: under alternatives 2 & 3 the gondola would run on the unprotected side of the ridge; under alternative 4 the gondola would be highly elevated near the ridgeline in order to pass over the existing KT chair line; gondola cabins present large surface areas, which result in greater wind resistance. The current KT chairlift was intentionally located below (in elevation) the ridgeline extending from the patrol shack to the "Nose" to the "Fingers", in addition to being on the leeward side of the ridge (given the typical storm and wind patterns), so that it could be operated during storm conditions. Combined, these facts all undermine the claim that the Squaw segment of the gondola would be able to operate during storm conditions, especially when KT may not be able to operate (e.g., EIS/EIR 4.1-10). Furthermore, I'll note that the Olympic Lady lift is capable of providing additional uphill capacity to parts of the KT terrain, yet on numerous occasions just in the 2017/18 winter (e.g., Saturday, March 3, 2018) when there were substantial lines for the KT lift (i.e., 30+ minutes) the resort did not run the Olympic Lady chair. If history is any precedent, then it seems the claims concerning additional uphill capacity during limited operations should be considered dubious at best.

0044-4

- Given the acknowledgement that the gondola may contribute to an increase in skier visits, coupled with the fact that during busy periods skier visits already exceed the desired capacity ("CCC") of the resorts (especially Squaw), it seems that the potential for the gondola to further degrade the skier experience by increasing crowds to "uncomfortable" levels should be recognized as an adverse effect.

0044-5

- The potential for increased visitors is problematic beyond the skier experience as well, as anyone who has been subject to the horrendous traffic entering/exiting Olympic Valley during busy winter periods can attest to. In other words, the gondola may exacerbate an already unbearable (literally—I, and countless others, will not go through the area at the affected times) traffic.

Chris Egger

231 Observation Court, Tahoe City

0044-2 cont'd, Alternatives (A)

0044-3, Alternatives (A)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. It is additionally noted that experienced mountain resort planners and lift equipment engineers developed the gondola alignments for each of the alternatives and factored in appropriate engineering and design considerations (including wind exposure) to ensure each of the alignments would be operable as much of the operating season as possible.

0044-4, Recreation (R1)

As described on page 4.1-10 of the Draft EIS/EIR, a skier visitation and use assessment (Appendix C of the Draft EIS/EIR) was prepared for the project. As stated therein, the project's increased visitation "is not anticipated to adversely affect the guest experience or lead to substantial deterioration of any ski area facilities because existing guest service facilities at Alpine Meadows and Squaw Valley are sufficient to support this increase in use." As it relates to the Comfortable Carrying Capacity (CCC), the CCC of a resort is used as a planning figure rather than the "desired capacity" as expressed by the commenter. CCC is a planning figure only and does not represent a regulatory cap on visitation. CCC is used to ensure that capacities are balanced across the resort's facilities and are sufficient to meet anticipated demand. By design, any resort will exceed the CCC numerous days throughout the winter season. Please refer to the "Comfortable Carrying Capacity" discussion contained within Section 4.1.1.1 of the Final EIS/EIR for further details on CCC and how it is applied for the analysis. In addition, Appendix C of the Final EIS/EIR provides additional detail on this subject.

0044-5, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0044

The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0045

Shirlee Herrington

From: Jill Ehring <jillehring@yahoo.com>
Sent: Wednesday, May 23, 2018 10:10 PM
To: Placer County Environmental Coordination Services
Subject: Gondola

0045-1

I think it is extremely important to recognize that the gondola represents more than just a means of transporting skiers back and forth from Squaw to Alpine. The Alpine area is secluded and has a long history of mud and rock slides, fires and avalanches. To have a secondary escape route via a gondola would be beneficial as well as a viable emergency alternative route of exit for residence and visitors year round. This would not only prevent potential loss of life but would decrease impact on the environment because of reduced traffic and rescue resources.

Jill Ehring

Sent from my iPhone

0045-1, Opinion (O1)

Emergency evacuation is addressed in Section 4.6, "Public Safety," of the Draft EIS/EIR. As described on page 4.6-13, the applicant will be required to prepare an Emergency Preparedness and Evacuation Plan (EPEP) to provide guidance and procedures in the unlikely event of an emergency requiring evacuation. Also, see PRM HAZ-11 in Appendix B of the Draft EIS/EIR.

Will Hollo

From: Bryan Elliott (DEN) <belliott@alterramtnco.com>
Sent: Monday, June 11, 2018 3:31 PM
To: 'comments@squawalpinegondola-eis.com'; cdraecs@placer.ca.gov
Subject: Comments on SVAM B2B Gondola Draft EIS/EIR
Attachments: Gazex Comment Letter .pdf

0046-1, Other (O2)

The attachment referred to in this comment is included as comment letter 0175 in this Final EIS/EIR. See response to comment letter 0175.

0046-1 | Attached please find comments on the Base-to-Base Gondola Draft EIS/EIR on behalf of Squaw Valley | Alpine Meadows.



BRYAN ELLIOTT
 CHIEF DEVELOPMENT OFFICER
 ALTERRA MOUNTAIN COMPANY
 P 303.749.8381 \ C 303.589.1545
 ALTERRAMTNCO.COM

Confidentiality Warning: This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of this message and any attachments is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system. Thank you.

0047

June 7, 2018

To: Placer County Planning Commissioners

Re: Gondola proposal at Squaw Valley

- 0047-1 | This project lacks in cost to benefit. No projects should be allowed that increase ADT until the traffic situation is fixed. No additional traffic is tolerable in the Highway 89 corridor in the winter. The exurbanite cost of the gondola does nothing for the traffic situation and those funds could be better used to improve existing infrastructure on the mountain as well as providing for improved transportation such as: providing a local shuttle service in both Alpine Meadows and Squaw Valley that would reduce vehicular traffic instead of a gondola that doesn't do much but increase skier visits for a few years, will run only a few months a year (provided climate change doesn't continue to worsen), and will likely be on wind hold a significant number of days during the few month usage.
- 0047-2 | Additionally, the gondola will have visual negative impacts and parallel abandoned towers that have been in place on Troy Caldwell's property for too many years. It is too close in proximity to the pristine five lakes wilderness. There aren't enough rendering showing how the gondola alternatives will look from Squaw Valley.
- 0047-3 | A recent mud slide in the area of the proposed alternatives should trigger more extensive soils investigations before moving forward with the project.
- 0047-4 | The gondola requires rezoning which should not be approved. Erosion of zoning is a slippery slope. Zoning is zoning for a reason or what's the point zoning.
- 0047-5 | Gas X Avalanche Control:
The gas x avalanche control devices are causing noise problems in both Squaw Valley and Alpine Meadows. The explosions are vastly louder than hand explosives and shake homes and rattle windows. Studies should be made before installing any more. Additionally, they are unsightly and should be painted or somehow made to blend better into the environment.
- No alternative makes good sense. There is no improvement to traffic and doesn't fit into the pristine mountain environment that tourist and locals alike come to enjoy.

Nancy Elrod

PO Box 2989
1181 Sandy Way
Olympic Valley, CA 96146

0047-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0047-2, Visual Resources (VR)

The existing gondola towers of the "KT South" chairlift are on the privately owned Caldwell property and are therefore beyond the scope of this analysis. Experiential impacts that would occur as a result of proximity of gondola infrastructure to the Five Lakes Trail, the Five Lakes, and the National Forest System-GCW are analyzed in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness."

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives from a feasible selection (16) of representative locations. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view from all possible locations in the project area; therefore, not all locations could be simulated for the purposes of this EIS/EIR. Highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0047-3, Soils/Geology/Seismicity (SGS)

Potential impacts related to soils are addressed in Section 4.16, "Soils, Geology, and Seismicity," in the Draft EIS/EIR. The following topics are addressed therein: mass wasting events including landslides, debris flows, and rock fall (Impact

0047

4.16-1); avalanches (Impact 4.16-2); soil limitations that could produce instability, structural damage, or risks of injury (Impact 4.16-3); and erosion (Impact 4.16-4). RPMs and mitigation measures are identified, where appropriate, that require development of a rock blasting plan to, in part, minimize the potential for blasting to trigger mass wasting; prevent erosion and ground disturbance during wet conditions; prevent construction activities on slopes that show signs of instability; and stabilize soils after construction is complete. Engineering studies identified as a requirement of project design will incorporate any available existing relevant data, including any recent mudslide or mass wasting events. All soils, geology, and seismicity impacts, under all action alternatives, are less than significant under CEQA, either prior to, or after consideration of RPMs and Mitigation Measures. All impacts are mitigated under NEPA.

0047-4, Land Use (LU)

The project requires approval from Placer County for a rezone to accommodate the Alpine Meadows base terminal (from Neighborhood Commercial to Open Space). This is discussed in the Draft EIS/EIR in Section 4.4, "Land Use," under Impact 4.4-1. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0047-5, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0048**Will Hollo**

From: Gary Ephraim <gephrai@gmail.com>
Sent: Friday, May 18, 2018 2:32 PM
To: Scoping Comments
Subject: California Express Gondola

0048-1 | I support the California Express Gondola as it will significantly result vehicle traffic between and around both Squaw and Alpine Meadows as well as enhance the vacation experience for this area. I have reviewed the plans and can see that the environmental impact has been minimized and know that Squaw Alpine management is extremely environmentally sensitive and will be good environmental stewards in this project.

Thank you.

Gary Ephraim
15255 Mallard Circle
Orland Park, IL. 60462

Sent from my iPhone

0048-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

From: 19evan90 <19evan90@gmail.com>
Sent: Sunday, May 20, 2018 5:47 AM
To: Scoping Comments
Subject: California Express

Dear USFS:

0049-1 | I support the California Express Gondola because it would reduce traffic and fuel consumption among those of us who ski both mountains in the same day.

0049-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0050

Will Hollo

From: roy farrow <rfarrow2@gmail.com>
Sent: Tuesday, June 5, 2018 1:44 PM
To: Scoping Comments
Subject: Squaw-Alpine Gondola

0050-1

As a home owner in Squaw Valley and a former resident of CO. I'm fully in favor of the gondola. Creation of a European type resort complex will go far to consolidate responsibility for maintenance of the necessary environmental steps needed to protect the area in a comprehensive manner. Historically Squaw and Alpine have had no well funded entity willing to take the lead, and as a result the area has suffered from the lack of consolidated efforts in all respects of its development and maintenance.
Roy Farrow

When something is important, you do it, even if the odds are not in your favor. Elon Musk

0050-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Mark Fisher <mark@unofficialalpine.com>
Sent: Monday, June 11, 2018 11:57 AM
To: Placer County Environmental Coordination Services
Subject: Save Alpine Meadows

0051-1

There's no need for any lengthy discussion. There is no reason at all to build any version of the SquawPine gondola connection.

There is no reasonable way that a person needs access to more than 6 or 7 lifts per day. People managed skiing at one resort or the other for 50 years.

There is no acceptable amount of visual pollution or environmental consequences that makes the gondola a necessity for anything other than bragging rights. Please do your job and reject the proposal: place the needs of the environment and locals before the needs of investors.

Mark Fisher
10165 Columbine Dr
Truckee Ca 96161

Sent from my iPhone

0051-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0052

RECEIVED
JUN 11 2018
CDRA

Victor A. Flores
1750 Village Road East, Unit 5127
Olympic Valley, California 96146
victor.flores.p@gmail.com

June 7, 2018

Community Development Resource Agency
Environmental Coordination Services
Attention: Shirlee Herrington, Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, California 95631

re: Squaw Valley-Alpine Meadows Base-to-Base Gondola Project

Dear Ms. Herrington:

0052-1

I am a Squaw Valley homeowner and am in favor of the Squaw Valley-Alpine Meadows Base-to-Base Gondola Project. I am in favor of the project even though several Gazex avalanche exploders would need be installed if the project were approved. These devices remove the need for on-the-ground human avalanche control (a dangerous mission for the ski patrol) and are therefore potentially life-saving. While I would hear this equipment from my home, I still support the project.

The project is beneficial to the Squaw Valley-Alpine Meadows community and will reduce traffic vehicular traffic in the region

I believe the Environmental Impact Report ("EIR") provides a comprehensive assessment of the project and that the EIR supports the project.

Sincerely,


Victor A. Flores

0052-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0053

Date submitted (Pacific Standard Time): 6/10/2018 5:20:51 PM

First name: Don

Last name: Fulda

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1220 Mineral Spring Trail

Address2: PO Box 5216

City: Tahoe City

State: CA

Province/Region: CA

Zip/Postal Code: 96145

Country: United States

Email: alpinedf@yahoo.com

Phone: (530) 587-3859 X107

Comments:

My wife and I have been full time residents in Alpine Meadows since completing our home on Mineral Springs Trail in 1989.

0053-1 | While I support the notion of the Base to Base Gondola, I do not support the applicants preferred Alternative 2. The visual impacts on Alpine Meadows/5 Lakes Trail and proximity to Barstool Lake (aka "Frog Pond")/Granite Chief Wilderness makes this alternative unacceptable. Alternative 4 will be far less visible with less potential impact on Barstool Lake, the GCW, and the Alpine Meadows valley.

0053-2 | I am also VERY concerned about the 8 additional Gazex exploders that are being proposed. While they are required for Alternative 2, they are not required for Alternative 4. The applicant has included the Gazex exploders in all the alternatives, possibly as a means of "equalizing" the potential impacts, but the addition of the 8 proposed exploders offers minimal direct benefit to Alternative 4.

Gazex exploders were used this past winter elsewhere in the valley and the impacts have been significant and I believe understated/not well understood by the applicant. The blasts are far more powerful and upsetting to pets and humans alike and I don't think the impacts were adequately assessed before the system was approved and deployed. Perhaps there are operational refinements that can be made to minimize the impacts of the system but the deployment of more exploders needs to be carefully considered and the need clearly defined.

0053-3 | In closing, I support the Base to Base Gondola concept but only if Alternative 4 is the alignment ultimately approved. More work and refinements to the existing Gazex system needs to occur before any more exploders are added to the system.

Thank you,

Don Fulda

0053-1, Visual Resources (VR)

Impacts related to visual resources, the Five Lakes Trail, and the GCW are addressed in Sections 4.2, "Visual Resources," 4.1, "Recreation," and 4.3, "Wilderness," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0053-2, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0053-3, Other (O2)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0054

Placer County

June 10th, 2018

Dear Placer County,

0054-1

Thank you for allowing us the opportunity to comment on the dEIR for the Squaw Alpine gondola. My family reviewed the document and found it woefully inadequate with respect to the visual impacts each alternative would cause for both summertime and wintertime visitors.

Having lived in the region for over 25 years and spending time as a family in these exact locations for over 35 years, it is entirely clear that this dEIR only scratches the surface of substantial visual impacts that would come from Alternatives 2, 3 and 4. We have spent many summer and winter days as well as nights, hiking, camping and skiing on this treasured land on the White Wolf property, along the beautiful granite lined ridge between KT 22 and Alpine Meadows, and within the area of Five Lakes proper.

0054-2

While the photos in the dEIR (which were taken by a good friend of mine) clearly show the impacts from select perspectives, they are not nearly comprehensive enough to capture the degradation to the visual assets of the area that these project alternatives would impose.

Of course, to get a genuine and full sense of the negative impacts, one would have to spend ample time inside the experiences this land can provide. Teddy Roosevelt's famous camping trip with John Muir in Yosemite in 1903 convinced him that preserving such lands was of paramount importance. However, it is understood that decision makers may not have the time necessary to thoroughly immerse within and deeply understand such experiences, which means that decisions are largely made off of words and images on paper. This makes it all the more important that the final EIR be held to the highest standard, so that the extent of the impacts can be better understood.

0054-3

The Final EIR must include a much more comprehensive documentation of the visual impacts for Alternatives 2, 3 and 4. The current documentation uses photographic lenses that capture what would be seen by the naked eye from select locations. However, they do not adequately include panoramic imagery that would be much more realistic in the way people would experience the landscape when they visually scan back and forth across it. In addition, to understand the full scope of the visual impacts of such a project for both local residents and visitors who recreate in the area, photos should be taken from many other important locations.

This project will permanently alter the visual aesthetic for a remarkable number of residences in Alpine Meadows and documentation of such needs to be included. Different lighting scenarios must also be captured - even cables which would seem invisible to the naked eye from afar, light up when the sun reflects off them at certain times of day. Thus under these varied circumstances, the final EIR must include panoramic imagery of the project towers, mid-stations, cables, and Gazex exploders from the following individual residences:

- 1) Those across the Alpine Meadows Valley, including, but not limited to, those on Snow Crest Road, Pine Trail, Mineral Springs Trail, Mineral Springs Place, Chalet Place, Upper Bench Road, Slalom Place, John Scott Trail, Park Drive, Bear Creek Drive, Chalet Road, Scott Peak Place, and Bear Falls Lane.
- 2) Those on the same side of Alpine Meadows Valley that have direct line of view of the project, including those on Juniper Mountain Road, Klosters Court, Zurs, Court.

0054-1, Visual Resources (VR)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0054-2, Visual Resources (VR)

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. They are also visible to a greater number of people traveling along the roads or from the base terminal. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be, or were required to be, simulated for the purposes of this EIS/EIR. Instead, highly frequented or prominent public areas and visually sensitive vistas were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone

0054

of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0054-3, Visual Resources (VR)

Please refer to response #0054-2 above for background information on the visuals analysis.

With regard to the commenter's point that visual impacts must be well documented for residents of Alpine Meadows, viewpoints 3 and 4 (along Chalet Road) are intended to be representative views from the Alpine Meadows subdivision. Please refer to those views in Appendix D of the Final EIS/EIR for all alternatives to view the anticipated visual impacts of the project for Alpine Meadows residents.

0054

0054-4

In addition, similar care must be taken to adequately capture the visual impacts on view sheds from within the project sites. This dEIR fails to capture the magnitude of those impacts. In addition to requiring panoramic images that correspond to the precise locations of each tower, mid-station, cables, and Gazex exploders, 360 degree views around each constructed item is needed. Every step on these lands is unique and holds value that only reveals itself if you spend ample time within them. With the precise locations of each tower, mid-station, or Gazex exploder, the 360 degree perspective will serve to provide readers of the EIR a more honest perspective of the permanent visual impacts each piece of the project would impose. The current mocked up photos of Barstool Station, for instance, do little to show the actual extent of the impact of this one portion of the project.

Worth mentioning, the photos also fail to create context that captures the ways views are experienced by people who recreate in the area. For instance, the photo below is of backcountry ice skating on a lake that would be directly impacted by Alternative 2. This is one of the more magical experiences one can have in the North Tahoe area, yet the current photos in the dEIR do not help readers fully understand the extent of what could be lost.



Family ice skating on Barstool Lake. The Squaw Alpine Gondola dEIR fails to adequately address the visual impacts upon experiences such as these. This is just one of many types of recreational experiences that visitors and locals enjoy in the proposed project area.

0054-4, Visual Resources (VR)

Please refer to response #0054-2 above for background information on the visuals analysis.

With regard to the caption of the attached photo, please note that the lake in the photo is the eastern-most lake of the Five Lakes (not Barstool Lake). Visual simulations have been created for this location. Please refer to View 14 for all alternatives within Appendix D of the Final EIS/EIR to view the visual impacts anticipated to occur at this location as a result of the project.

0054

0054-5

In summary, the final EIR for the Squaw Alpine gondola needs to more comprehensively address the visual impacts of the project than what is currently in the dEIR. Thank you for your time and consideration of these comments. I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "RAB" followed by a stylized flourish.

Robb Gaffney, M.D.
503-412-1325
PO Box 1725
Tahoe City, CA 96145

0054-5, Visual Resources (VR)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0054

Will Hollo

From: Scott Gaffney <gaffney@mspfilms.com>
Sent: Tuesday, May 22, 2018 11:37 PM
To: Scoping Comments
Subject: Squaw gondola

0055-1

I would like to add my name to the many citizens and visitors who disapprove of the Squaw Valley to Alpine Meadows gondola proposal. Like the Squaw village development proposal, the list of pros of the gondola is short, while the detrimental impacts are many. And those detrimental impacts have a permanence that this environment can't and shouldn't bear. Everyone knows this gondola is more about marketing than functionality; it's not increasing skiable terrain, it's not providing a vastly better skiing experience, and it isn't significantly going to cut down on traffic between the two areas. It merely allows the ski area operator to boast that the two mountains are interconnected. But at what expense? Is the impact on that easily-accessible escape into the wilderness via the Five Lakes Trail worth it? My vote is no. I'd hope you'd vote the same and encourage Squaw Valley to spend tens of millions of dollars in a far more worthwhile fashion.

Thanks you for your time.

Scott Gaffney
gaffney@mspfilms.com

0055-1, Opinion (O1)

Skier experience is addressed in the Draft EIS/EIR in Section 4.1, "Recreation." Changes in traffic patterns are addressed in the Draft EIS/EIR in Section 4.7, "Transportation and Circulation." Impacts to wilderness areas, including the Five Lakes Trail, are addressed in the Draft EIS/EIR in Section 4.3, "Wilderness." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

The comment is also directed towards the project approval process. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0056

Shirlee Herrington

From: Gallant <pbgallant@yahoo.com>
Sent: Saturday, June 02, 2018 7:55 AM
To: Placer County Environmental Coordination Services
Subject: squaw valley alpine meadows gondola project

0056-1

Squaw Valley and Alpine meadows are already overcrowded. Both resorts routinely fill their parking lots on weekends and the lift lines are huge. The resorts have placed numerous gazex machines across the ridge tops and they are an eyesore, bringing an industrial look to the mountains. Squaw Valley and Alpine Meadows have different types of skiers. The skiers that like Alpine Meadows don't want anything to do with Squaw Valley. They want Squaw to stay over there, not be connected by a gondola that will cross over the ridges of both mountains and be an eyesore for eternity. Please do not permit this project.
Gallant
pbgallant@yahoo.com

Pat

0056-1, Opinion (O1)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

The comment is also directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0057

Will Hollo

From: Travis Ganong <travis.g.skier@gmail.com>
Sent: Sunday, May 13, 2018 11:21 AM
To: Scoping Comments
Cc: cdraecs@placer.ca.gov
Subject: California Express Gondola EIR/R

Dear USFS/Placer County,

0057-1

My name is Travis Ganong and I was born and raised in Alpine Meadows, and grew up skiing at Squaw Valley. These mountains have taught me everything I know about skiing and living a healthy active mountain lifestyle, and I can attribute growing up here to my current position as a member of the US Ski Team, where I have become a world cup winner, world championship silver medalist, and accomplishing my goal of representing our region and our country at the Olympics. I support the California Express Gondola that would link together Squaw Valley and Alpine Meadows because this is the next step in the evolution of our region into a world class ski destination and will create a new legacy of mountain recreation and pride for locals and visitors alike.

When the first chairlift was installed in Squaw Valley and we secured the bid for the 1960 Olympics, people from around the world came here and discovered how our terrain, natural snow, and inspiring mountain setting rivaled the best skiing destinations in the world. The developers of Alpine Meadows followed suit in installing chair lifts after looking over the ridge line while skiing Squaw. They saw the amazing skiing potential there and that Alpine offered something different and complimentary to the steep and extreme terrain at Squaw with longer intermediate runs in the trees and amazing views of the lake. Fast forward to 2018, and now as a region we are finally taking the next step in evolving our region to fulfill its true potential by linking these different and complimentary resorts with an iconic lift.

I believe that this gondola will enhance the visitor experience at Squaw Valley and Alpine Meadows by providing easier and faster inter-resort access to the terrain and amenities and both resorts. It will also reduce customers time in cars and resort shuttle time in vehicles on our overwhelmed two lane roads, and give skiers the option to offload at mid stations providing easier access to existing skiable terrain with a gondola designed to have the three sections run independent of the rest of the line (especially during storm days when existing lift capacity at the base of both mountains is overwhelmed). Also it will improve the safety of the avalanche control measured for both Alpine Meadows road and the parking lots and base area of Alpine Meadows.

I also see after reading through the EIR/E, that a thorough analysis that has been put into this proposal by the USFS and Placer county as well as by the applicant, and that we all have enough information to use moving forward in choosing a path for the gondola that will lead to enhancing the visitor experience and solving some issues that we face as a resort community. In my opinion (and in agreeing with the findings of the EIR/R) I believe that Alternative 4 is the best alignment for the gondola for all the reasons listed in the report. I also think it is the best plan because it has the least exposure to wind and avalanche danger, it drops skiers off at a higher point on KT-22 than the other alignments allowing them to access the expansive terrain to the east of the existing KT lift, and its base terminal on the Squaw side is located in a more central and convenient place for access by guests. Plan 4 also has a path lower to the ground and more hidden from sight down the Alpine Meadows side of KT, following a natural rock gully so that the views from homeowners and people recreating will be minimal, and it has the shortest actual distanced traveled of all the plans making ride time, construction expense, and disruption of land less invasive. Finally it is also located the farthest away from the Granite Chief Wilderness Area so that people enjoying the natural beauty up there will not hear or see the gondola.

As a local skier I strongly support the California Express Gondola Alternative 4 route, and believe that this lift will enhance the skiing and mountain recreation experience at Squaw Valley and Alpine Meadows. I have been traveling and

0057-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project, identifies agreement with some findings of the the Draft EIS/EIR, and expresses a preference for Alternative 4. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

00570057-1
cont'd

competing all over the world as a US Ski Team member for the last 15 years, and I have seen how these types of lifts work in linking resorts and communities and in helping transport people efficiently without vehicles. This ski lift is the next step for our region and will put us right back up near the top tier of the best mountain recreation destinations in the world.

Thanks,

Travis Ganong
US Ski Team
Olympian

0057-1 cont'd, Opinion (O1)

4.

Shirlee Herrington

From: Mike Gardner <jmgardner@gmail.com>
Sent: Monday, May 21, 2018 2:33 PM
To: Placer County Environmental Coordination Services; comments@squawalpinegondola-eis.com
Subject: Squaw Alpine Gondola

Dear USFS/Placer County:

0058-1 | I fully and wholeheartedly support the California Express Gondola because of reduced car trips, less congestion and better access to both mountains. I am tired of taking the shuttle or driving over when conditions are better at one or the other. Please let this pass through to help the environment!!

Mike

0058-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0059

Will Hollo

From: Eric Gellerman <ericgellerman@gmail.com>
Sent: Tuesday, May 22, 2018 6:32 PM
To: Scoping Comments
Subject: Squaw/ Alpine Gondola

To Whom it May Concern:

0059-1

I'm in favor of the gondola. It's a good use of public land and will reduce car trips and air pollution.

My kids are ski team members and spends lots of time in shuttle traffic every winter

All of us have a right to enjoy public lands

Thank you,

Eric Gellerman.

Sent from my iPhone

0059-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Kathryn Goldman Schuyler <kathryn@red7.com>
Sent: Monday, May 21, 2018 3:59 PM
To: Shirlee Herrington
Subject: Re: Squaw Valley - Alpine Meadows Base-to-Base Draft EIS/EIR

Can this be placed in the record, or should I put it into a word document and re-send this as an attachment?

Hello Ms. Harrington,

0061-1

As an owner at Squaw Valley Lodge for over 15 years whose windows would look directly at the base (were it to be placed at the location for alternatives 2 and 3), I am pleased with the conclusions of staff and would like to go on record supporting their selection of alternative 4, with its lower levels of environmental impact.

Although I believe your task is not to consider the noise and visual impact on human residents, but on the land itself and on animal residents, as someone who chose to purchase a home-away-from-home at Squaw Valley Lodge, the difference between alternative 4 and the others is immense. We chose our home because of the quiet and peaceful location and view. Were the gondola to be located other than near Red Dog, there would be considerable ongoing noise, not only from construction, but all of the time, very close to our windows. There would also be obstruction of the natural beauty that we currently look at and a constant sense of activity, rather than peace.

My husband and I heartily support the recommendations for either alternative 1 or 4.

Best wishes,
 Kathryn Goldman Schuyler and Jim Schuyler
 Owner, Squaw Valley Lodge Unit 253

On May 21, 2018, at 3:12 PM, Shirlee Herrington <SHerring@placer.ca.gov> wrote:

Good Afternoon,

Please find the attached agenda and staff report for the above noted project scheduled for the May 25th Planning Commission meeting. Additional Staff Reports and associated documentation can be accessed on the County's Website:

<http://www.placer.ca.gov/departments/communitydevelopment/planning/pchearing>
5

*Thank you,
 Shirlee*

~~~~~  
 Shirlee I. Herrington  
 Environmental Coordination Services  
 Placer County Community Development Resource Agency  
 3091 County Center Drive, Suite #190  
 Auburn, CA 95603  
 530-745-3132

## 0061-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.



**0061**

[sherring@placer.ca.gov](mailto:sherring@placer.ca.gov)

~~~~~

<image009.png>

<05-24-18 FINAL Agenda.pdf><SR-F-PC 15-00398 SV-AM B2B Gondola 052418.pdf>

Shirlee Herrington

From: Bill Gonsalves <wmgonsalves@gmail.com>
Sent: Friday, May 18, 2018 2:13 PM
To: comments@squawalpinegondola-eis.com
Cc: Placer County Environmental Coordination Services
Subject: CA Express Gondola

"Dear USFS/Placer County:

0062-1 | I support the California Express Gondola because it will provide a fantastic skier experience at Squaw/Alpine. I have seen the advantages that this type of connection has had at Park City/Canyons.

I am a local property owner in Tahoe and would like to see this project completed.
Regards,

--
Bill Gonsalves

0062-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0063

Shirlee Herrington

From: Susan Graf <susanflanders@sbcglobal.net>
Sent: Friday, June 08, 2018 9:18 AM
To: Placer County Environmental Coordination Services
Cc: hjones@sierrasun.com; admin@greatoldbroads.org
Subject: Gondola project

- 0063-1 | We are long time homeowners in Alpine Meadows and object vehemently to the proposed gondola just inches from the Granite Chief Wilderness. The EIR knows a wilderness cannot be encroached upon and this project is dangerously close to violating a long held law regarding wilderness. Long ago when the Granite Chief Wilderness was being designated, we helped move the existing Bradley Hut to Pole Creek due to the strict adherence by the Forest Service that no manmade structures be allowed. This project should not be allowed.
- 0063-2 | We have also noted the newly installed Gazex towers above Alpine Meadows Road and directly impacting our view. We were not notified of the installation. Was there a permit? These pipes are an abomination but we will have to live with them forever in the belief that safety of the traffic on the roads is the highest priority.

Susan and Peter Graf

0063-1, Wilderness (W2)

The Wilderness Act of 1964 does not provide for the establishment of development buffer zones around wilderness areas, nor do any subsequent laws related to wilderness designation. It is also important to note that while the gondola would cross through a portion of the congressionally mapped Granite Chief Wilderness (GCW) under Alternative 2, it would cross only through private lands located within the congressionally mapped GCW (in particular, through a 54.6-acre portion of the privately owned Caldwell property). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, these land use restrictions do not apply on private lands. Please refer to Section 4.3, "Wilderness," in the Draft EIS/EIR for further information.

0063-2, Visual Resources (VR)

The existing Gazex facilities previously installed above Alpine Meadows Road are not a component of the gondola project and therefore beyond the scope of this analysis.

Regarding the installation of additional Gazex facilities at Alpine Meadows (which was initially included as part of the proposal for the gondola project and analyzed in the Draft EIS/EIR), this component of the gondola project has been removed from the proposal since publication of the Draft EIS/EIR. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Shirlee Herrington

From: Louise Greenspan <katloug@yahoo.com>
Sent: Sunday, April 29, 2018 9:42 AM
To: Placer County Environmental Coordination Services
Subject: Comments on Squaw Valley Gondola Project

To whom it may concern,

0066-1

Please do not allow this project to go any further. The EIR clearly states the negative effects the Gondola will have on the area. My particular concern is the damage to the Granite Chief Wilderness and Five Lakes area. This beautiful part of the mountains is too precious to be ruined by a Gondola.

Thank you,
Kate Green

0066-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0067**Will Hollo**

From: Adam Grossman <agrossman345@icloud.com>
Sent: Tuesday, June 5, 2018 1:09 PM
To: Scoping Comments
Subject: Comments on Proposed Gondola

0067-1 | Deny.

0067-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0068

Will Hollo

From: Heather Beckman <HBeckman@placer.ca.gov>
Sent: Wednesday, May 23, 2018 9:08 AM
To: Will Hollo; Shirlee Herrington
Subject: FW: Gazex issues on Alpine Meadows Rd.

FYI

Heather Beckman
 County of Placer - Community Development Resource Agency
 (530) 581-6286 / hbeckman@placer.ca.gov

From: Heather Beckman
Sent: Wednesday, May 23, 2018 8:08 AM
To: 'Craig Hamilton'
Subject: RE: Gazex issues on Alpine Meadows Rd.

Hi Craig

Thank you so much for your thoughtful and detailed comment, and for providing suggested solutions! I will make sure that this comment is part of the public record – and which ensures that it will be responded to in the Final EIS/EIR.

Over the last week we have started to hear a number of similar comments on the use of Gazex at Alpine Meadows. This is certainly something we will be researching more as the project moves forward.

Thank You

Heather Beckman
 County of Placer - Community Development Resource Agency
 (530) 581-6286 / hbeckman@placer.ca.gov

From: Craig Hamilton [<mailto:craig.s.hamilton@gmail.com>]
Sent: Tuesday, May 22, 2018 12:31 PM
To: Heather Beckman
Subject: Gazex issues on Alpine Meadows Rd.

Dear Ms. Beckman,

0068-1

I'm writing in response to the recent environmental report relating to the Squaw/Alpine gondola project. Specifically, my concerns have to do with the installation of Gazex machines above Alpine Meadows Road. I found your name in an article in the Truckee Sun, so please forgive me if my letter should be addressed to someone else. If so, I would be grateful if you could forward this to the appropriate person at the County.

As a resident of the avalanche zone on Alpine Meadows Road, I first want to say how appreciative our family is of the attention and care being given to protecting our neighborhood from the dangers of a major avalanche.

We are aware of the many risks the avalanche mitigation team has taken on our behalf over the years and immensely grateful for the level of safety they've provided to us.

0068-1, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0068

0068-1
cont'd

We also appreciate and applaud the efforts that have recently been taken to add more avalanche prevention infrastructure to increase the safety along the road even further, as well as to reduce the handling of dangerous explosives by ski patrol.

I'm writing today to let you know about what may be an unintended consequence of the recent Gazex installations above Alpine Meadows Road and to ask for your serious consideration of a remedy.

We live at 1769 Alpine Meadows Road, right in the heart of avalanche territory.

The first time I experienced a Gazex detonation this winter, I nearly jumped out of my chair as our house shook from the intensity of the blast.

The windows rattled in their frames. Objects wobbled on bookshelves. The house itself seemed to lurch violently.

In fact, I honestly thought that the avalauncher had misfired and a charge had hit our house.

Upon discovering that we had not actually been hit by a bomb, I immediately called Alpine Meadows Dispatch to inform them that whatever had just happened was extremely frightening for us on the main road and that such a powerful explosive force at such close proximity could be potentially damaging to our house.

I was informed that this was a Gazex detonation and that I should expect more of them.

I have since spoken with my neighbors on the road and discovered that we were not alone in our experience.

One neighbor reported that his two daughters burst into tears when the Gazex was detonated.

Others shared that they had been similarly shocked and frightened by the intensity of the blast and worried for the impact on their homes.

Clearly, if this were a one-time event that we all had to live through, we could accept it and recover from it. However, we're aware that these Gazex devices are a core part of the avalanche prevention strategy in Alpine Meadows and that in fact there are more installations planned.

So, I'm writing today to formally request a review of the current avalanche mitigation strategy from a vantage point that may not have been adequately included in the original assessment: **the impact on homeowners living in or near the avalanche zone.**

I would like to ask the planning department to reconsider both the placement and positioning of these devices with an eye toward reducing the impact on homeowners and homes.

Specifically, I would like to ask them to consult with structural engineers about the impact of this level of blast force on existing structures that were not built to withstand such forces. It is my sense that each time a blast like this hits my house, it will weaken the seals around windows, cause microfractures in drywall, grout, the foundation and many other structural elements, leading to a much more rapid deterioration of the integrity of the structure than would occur under normal circumstances.

0068-1 cont'd, Noise (N)

0068-1
cont'd

I would also like to ask them to consider the human impact of these blasts. If children and adults alike are feeling rattled to the core each time a Gazex machine detonates, this is clearly a cause of psychological trauma with potentially long lasting effects.

We've lived in Alpine for six years so we are accustomed to regular bombing in the canyon.

What my neighbors and I want to make clear is that the Gazex blasts are of an entirely different order than anything we've previously experienced during avalanche control operations.

If any of the planning authorities want to have a direct experience of what it's like to be in my house when these machines are detonated, I would welcome you over for a test blast anytime you would like to arrange it.

My sense is that these Gazex devices were designed for high Alpine use, on ridgelines and mountaintops far away from where people actually live. I applaud them in their efficacy. But I wonder if they can safely be deployed so close to areas of human habitation.

Some thoughts to consider:

-Could these large explosive devices be replaced by a greater number of smaller devices, each emitting a lower blast force but together achieving the same result?

-Could they be repositioned so that the blast isn't aimed as directly at the neighborhood below?

-Are there alternatives that could be deployed in areas closer to the road, reserving the Gazex strategy to areas further from our neighborhood?

This is an issue affecting many homeowners and I know we would all appreciate knowing that our concerns are being heard. Feel free to respond directly to me and I would be happy to pass your response along to my neighbors. Or if you or someone on your team would like to arrange a meeting with several of us to hear our direct experiences, I would be happy to help set that up.

Thank you in advance for your consideration of these issues. I look forward to hearing from you.

Sincerely,

Craig Hamilton
1769 Alpine Meadows Rd.
Alpine Meadows CA 96146
310-595-0215

Mailing address:

PMB #621
11260 Donner Pass Rd. #C1
Truckee CA 96161

0068-1 cont'd, Noise (N)

0069

Will Hollo

From: susan hamilton <hamiltonsb@comcast.net>
Sent: Wednesday, May 23, 2018 10:15 AM
To: Scoping Comments
Subject: Impact of this project

0069-1

Please DO NOT MOVE FORWARD WITH THE PROJECT. Increased traffic will only pollute the lake and decrease it's clarity. Construction will negatively impact the wildlife habitats and further erode outdoor experience.

I am against this project.

Susan

0069-1, Opinion (O1)

Project effects on Lake Tahoe water quality and lake clarity were not addressed in the Draft EIS/EIR for the reasons described on page 4.17-24 of the Draft EIS/EIR. In summary, indirect effects on Lake Tahoe water quality associated with additional vehicular trips to and from the Lake Tahoe Basin would be minor and would be within thresholds established for the protection of lake water quality. The gondola project is expected to generate only a small amount of VMT in the Lake Tahoe Basin, and only in winter; therefore, the project would not cause VMT to exceed carrying capacity thresholds (see page 4.17-24 of the Draft EIS/EIR for further discussion).

Construction impacts are addressed throughout the Draft EIS/EIR, and impacts to wildlife habitats are addressed in Section 4.14, "Wildlife and Aquatics." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

Will Hollo

From: Jon Hanshew <jhanshew@pacbell.net>
Sent: Monday, May 21, 2018 7:07 PM
To: Scoping Comments
Subject: Squaw-Alpine Gondola

Dear USFS/Placer County:

0070-1 | I support the California Express Gondola because I enjoy skiing at both locations. Being able to access both easily would be wonderful.

Sincerely,

Jon Hanshew
Sent from [Mail](#) for Windows 10

0070-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0073**0073-1, Opinion (O1)**

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0073-1

Date submitted (Pacific Standard Time): 5/23/2018 7:55:24 AM

First name: John

Last name: Hendricks

Organization:

Title:

Official Representative/Member Indicator:

Address1: 12177 Mougile Lane

Address2:

City: Truckee

State: CA

Province/Region:

Zip/Postal Code:

Country: United States

Email: Hendricks@sbcglobal.net

Phone: 6506191206

Comments:

I am in favor of building this project.

Specifically my preference would be Alternative 4. This route seems the least disruptive as it parallels existing lifts for much of its routing.

My only disappointment is that I thought the gondola was going to be a European style transport with just a couple of towers with cables spanning great distances. The current proposal of over 30 towers puts many more "boots on the ground" both during construction and on going maintenance.

Shirlee Herrington

From: Ed Heneveld <dced@att.net>
Sent: Sunday, June 10, 2018 10:55 AM
To: Placer County Environmental Coordination Services
Subject: Squaw-Alpine Gondola

Placer County and USFS,

0074-1 | Regarding the proposed gondola between Alpine Meadows and Squaw Valley ski areas, I have two comments following my review of the draft EIR/EIS:

1. I do not oppose the connecting transport system ONLY if it stays out of the congressionally dedicated wilderness boundary (regardless of private land rights). I support alternative #4.
2. By moving the base of the Squaw side of the gondola system, I see no analysis of how SV Resort will accommodate their proposed swale on the south side of their SVRE planned Village at Squaw Valley. I understand from the SVRE proposed village that they plan to accommodate Squaw Creek south fork flooding by creating a swale that runs along the south side of existing and new infrastructure. Impacts to high points at the base of Exhibition and Red Dog lifts have not been detailed or even analyzed. Please address this.

Thank you for the opportunity to comment.

Ed Heneveld
 589 Forest Glen Road
 Olympic Valley, CA 96146
dced@att.net
 (530)583-1817

0074-1, Project Description (PD)

While the gondola would cross through a portion of the congressionally mapped Granite Chief Wilderness (GCW) under Alternative 2, it would cross only through private lands located within the congressionally mapped GCW (in particular, through a 54.6-acre portion of the privately owned Caldwell property). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, these land use restriction do not apply on private lands. Please refer to Section 4.3, "Wilderness," of the Draft EIS/EIR for further information.

The Village at Squaw Valley Specific Plan Project is included in Table 3-3, "Cumulative Effects Projects," and discussed in the cumulative effects sections of resources to which it is relevant throughout Chapter 4 of the Draft EIS/EIR. Additionally, resort mountain planners are aware of the referenced swale. It is intended that the swale would start at about the eastern edge of Red Dog Face and drain to the east, so it would not be impacted by the proposed Squaw Valley gondola base terminal location under Alternative 4. If, upon final design, the swale needs to start further west than the eastern edge of Red Dog Face run, it would be located further up the slope than the proposed gondola base terminal under Alternative 4 (in order to have positive grade to the east and remain above the proposed village development) so it still would not be impacted by the proposed base terminal location under Alternative 4.

0075

Date submitted (Pacific Standard Time): 5/24/2018 8:10:35 AM

First name: James

Last name: Heykes

Organization:

Title:

Official Representative/Member Indicator:

Address1: 403 Nightingale Rd.

Address2:

City: Carnelian Bay

State: CA

Province/Region:

Zip/Postal Code: 96140

Country: United States

Email: Teleskier100@yahoo.com

Phone: 9168473845

Comments:

0075-1 | In addition to the numerous negative environmental effects the gondola project would have, as determined in the environmental impact statement, I would like to comment on what I think is a fundamental flaw - the finding that the gondola would have a "beneficial" effect on the recreational experience (section 4.1-1 of the eis). Squaw Valley and Alpine Meadows are unique ski areas, with very different character and attributes. Squaw is high energy, hustle and bustle, the home of hard charging Olympic racers. Alpine is low-key, relaxed, relatively uncrowded, with a very different ambience from Squaw. In fact, the Alpine Meadows Master Plan published in 2015 lists Alpine's friendly low key atmosphere, relatively uncrowded slopes, low skier density, and substantial amount of undeveloped terrain (offering hike-to, "backcountry style" skiing) as prime attributes that contribute to a high quality skiing experience at Alpine Meadows. Adding the gondola and it's inevitable influx of additional skiers at Alpine would erode those qualities that make Alpine one of the best ski areas in the country.

0075-2 | In addition, the "need" for better connectivity between the two areas is overblown. They are both large areas; it is difficult to ski all of the terrain at either area in one day and be nearly impossible to ski both areas in one day. Even guests coming for a weekend can ski one day at Squaw and one day at Alpine, and enjoy the unique character and terrain of each area. Squaw Valley Ski Holdings would be much better served (and would serve the skiing public better) by emphasizing the individual strengths of each area independently and the different quality of the ski experience each area has to offer, rather than trying to homogenize the two into one big conglomerate ski area.

0075-3 | As a long time Alpine Meadows (and Squaw Valley) skier, I am firmly opposed to the base to base gondola project and would strongly urge the forest service and Placer County to deny this project.

James H. Heykes

0075-1, Recreation (R1)

The commenter disagrees with the conclusion in the Draft EIS/EIR regarding the project's beneficial effect related to recreation experience, access, and visitation. As described on page 4.1-10 of the Draft EIS/EIR, a skier visitation and use assessment (Appendix C of the Draft EIS/EIR) was prepared for the project. As stated therein, the project's increased visitation "is not anticipated to adversely affect the guest experience or lead to substantial deterioration of any ski area facilities because existing guest service facilities at Alpine Meadows and Squaw Valley are sufficient to support a minor anticipated increase in use." The commenter's opinions and preferences for maintaining the character of Alpine Meadows will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors in rendering their decisions on the project.

0075-2, Purpose and Need (P&N)

As identified by the commenter, the two ski areas have individual strengths and offer different recreational experiences. The objective of the project is not to homogenize the two ski areas by connecting them, but rather to provide easy, and potentially faster, interresort access to terrain and amenities at both ski areas, thereby improving the visitor experience.

The remainder of the comment provides an opinion regarding the merits or qualities of the project's need and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0075-3, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the

0075

Placer County Planning Commission and Board of Supervisors
before a decision on the project is rendered.

0076

Shirlee Herrington

From: Chris Hinkel <christine.hinkel@gmail.com>
Sent: Monday, May 21, 2018 8:01 PM
To: Placer County Environmental Coordination Services
Subject: Squaw Alpine Gondola comment

0076-1 Dear Placer County Representatives,
 Thank you for your time in reviewing my input on this project. I am against putting in the gondola to connect Squaw to Alpine.

Reason #1 It would wreck the wilderness that so many people enjoy. The 5 Lakes Trail is one of the most heavily used trails in the area. The wilderness feeling of that area would be ruined by seeing a gondola in there.

#2 It would wreck the environment there.

#3 These 2 mountains have a different feel from each other and I feel we should keep it that way. Squaw is more showy, caters to people that want to be seen and like the Squaw hype. Hotels, golf course, retail and restaurants.
 Alpine is laid back family style.

#4 Putting in the gondola would ruin it for so many and it's only for the bottom line of a few, not looking out for the rest of us.

Please don't approve this.

Sincerely,
 Chris Hinkel



Chris Hinkel
 530.412.2644
 Sierra Sotheby's International Realty

Truckee . Lake Tahoe . Tahoe Donner
 Martis Camp . Lahontan . Northstar

DRE#01876474
 10044 Donner Pass Rd.
 Truckee, CA., 96161
Chris.Hinkel@Sothebysrealty.com

Located next to the Bar of America in Historic Downtown Truckee
[Watch my YouTube videos on real estate and Tahoe fun](#)
[My Website](#)

0076-1, Opinion (O1)

The comment is directed towards the project approval process as well as providing an opinion regarding the merits or qualities of the project. The comment does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

To: Placer County Community Development Resources Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603
Attention: Shirlee Herrington, Environmental Coordination Services
Email: cdraecs@placer.ca.gov

U.S. Forest Service Tahoe National Forest, Truckee Ranger District
% NEPA Contractor
P.O. Box 2729
Frisco, CO 80443
Email: Comments@squawalpinegondola-eis.com

Subject: Comments regarding Squaw Valley/ Alpine Meadows Base-to-Base Gondola Project and Installation of Gazex for Avalanche Control

To Whom it may Concern:

Following are our concerns about the Base-to-Base Gondola & Gazex Installations.

- 0077-1 | The Gondola would not open up more skiable terrain which should be the main reason for installing the Gondola.
- 0077-2 | It's only a mode of transportation which we believe would be used by a limited number of people and not lessen the traffic to either ski area mainly on weekends and Holidays. People would still be driving into either valley to park their cars.
- 0077-3 | Should the Gondola be shut down due to high winds or maintenance issues and people need to be transported back to the car in the "other" valley how would that be accomplished?
- 0077-4 | As full time residents of Alpine Meadows we have experienced the impact of the Gazex's on our lives. The noise when they are detonated echos throughout the valley, our house was shaking and we were many times awoken during the night (eg. 1:00 am, 2:00 am, 6:00 am) because of their powerful noise level and force (including shaking of the ground).
- 0077-5 | The recent mud slide that closed Alpine Meadows road could have easily been caused by the Gazex's used last winter as there are tremors when the explosions take place. Not only are people affected by this powerful noise house pets (dogs& cats) will also suffer.
- 0077-6 | The impact on wildlife is immeasurable.
- 0077-7 | The residents of Alpine Meadows should not have to be exposed to such impactful means of snow safety measures. Europe mainly Austria, France, Italy and Switzerland which have numerous ski areas with high avalanche danger snow safety fences above villages have been installed for 50+ years and are highly effective. There will always be a situation where the biggest and the best provisions will not be sufficient to protect men and property. Recently Gazex's as well as other similar devices have been installed in the Alps, however, the installations are out of the residential areas and are not affecting the residents and guests who travel to the resorts in hopes to enjoy a quiet ski vacation.

Respectfully submitted by:
Caspar and Ursula Hirsbrunner
1309 Mineral Spring Place, Alpine Meadows
mailing address: P.O. Box 2895, Olympic Valley, CA 96146
phone: 530-581-0810
email address: casparh.ursulah@gmail.com

0077-1, Recreation (R1)

Section 1.3, "Purpose and Need and Project Objectives," of the Draft EIS/EIR describes the Forest Service purpose and need and the CEQA project objectives for the project. As stated therein, "the overall purpose of the project is to enhance the visitor wintertime experience at both Squaw Valley and Alpine Meadows by providing direct connection between the ski areas for more convenient access to skiable terrain and resort amenities." The stated project objectives are related to providing greater access between the ski resorts, not opening up more skiable terrain, as the comment states.

0077-2, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Impacts related to traffic and parking are addressed in Section 4.7, "Transportation and Circulation," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0077-3, Project Description (PD)

Wind closures would be implemented as necessary to ensure safe operation of the gondola. Further detail on this matter is beyond the scope of this analysis, as the specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives. However, it is understood that SVSH would operate the present shuttle system to move people between resorts during periods when the proposed gondola is inoperable.

0077-4, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0077**0077-5, Noise (N)**

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0077-6, Wildlife and Aquatics (W&A)

Wildlife impacts are addressed in Section 4.14, "Wildlife and Aquatics," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0077-7, Alternatives (A)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0077

0079

0079-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Impacts to the Alpine Meadows viewshed are addressed in Section 4.2, "Visual Resources," and impacts to the wilderness area, the Five Lakes Trail, and the Pacific Coast Trail are addressed in Sections 4.1, "Recreation," and 4.3, "Wilderness," of the Draft EIS/EIR. Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0079-1

Date submitted (Pacific Standard Time): 6/11/2018 1:34:08 PM

First name: Katy

Last name: Hover-Smoot

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1529 MINERAL SPRINGS TRL

Address2: 1529 MINERAL SPRINGS TRL

City: ALPINE MEADOWS

State: CA

Province/Region: CA

Zip/Postal Code: 96146

Country: United States

Email: khoversmoot@gmail.com

Phone: 4086235871

Comments:

Thank you for giving the public an opportunity to comment on this project.

While I strongly prefer a "no-gondola" alternative, I believe such a scenario is unlikely. With that in mind, I urge Placer County and USFS to accept the "environmentally preferred" route--Alternative 4. This alternative provides Squaw Valley with its desired connection, and limits the impacts to both the Alpine Meadows viewshed as well as the popular 5 Lakes Trail.

In my opinion, Alternative 2 would be remarkably destructive to the wilderness just passed 5 Lakes that feeds into the Pacific Crest Trail. Alternative 3, also places a mid-station too close to the wilderness. Alternative 4 offers a compromise that residents, visitors, and resort management can embrace.

Of bigger concern is the ultimate plan to build 40 homesites in the granite canyon in-holding owned by Troy Caldwell. The gondola presents minimum impact compared to the proposed White Wolf Development.

All the best,

Katy Hover-Smoot

Shirlee Herrington

From: Dan Hudson <dHUDSON@HUDCORP.NET>
Sent: Friday, May 11, 2018 10:10 AM
To: Placer County Environmental Coordination Services
Cc: Dan Mash
Subject: RE: Squaw Valley Lodge - Important Notice - Base to Base Gondola

To whom it may concern,

0080-1

My name is Daniel Hudson, and I live in the Squaw Valley Lodge unit 359. This is the closest unit to the proposed site two and three alternatives for the gondola and as such, might be the most impacted unit in the entire Squaw Valley.

I have personal deep concerns about building such a large structure and the attendant pressure from people using the gondola directly adjacent to the Cushing Pond. The pond represents a significant riparian environment, and holds deep emotional and psychological meaning for the people supporting Squaw Valley. The chance of a gondola of that magnitude adversely affecting the fragile ecosystem of the Cushing pond is way too high – I would suggest it's almost a certainty.

I have concerns about noise not just during normal skiing hours but operational maintenance etc. for a structure and a contrivance of such great magnitude.

I will object strenuously to the denigration of my views of the mountain – one of the primary reasons I bought the apartment in 2004.

I suggest that a location such as this – practically on top of the Cushing pond – is more of a desire by the Squaw Valley Ski Corporation to draw hordes of people across their food court and bar areas than a consideration for the fragile Alpine environment.

I strongly suggest consideration for the alternative site number four; the site deemed to have the least environmental impact on the Alpine environment.

Would you be so kind as to acknowledge receipt of this letter?

Sincerely,

Dan Hudson

Cc: Dan Mash attorney at law

0080-1, Opinion (O1)

As described in Section 4.14, "Wildlife and Aquatics," of the Draft EIS/EIR, Cushing Pond is a human-made, freshwater pond. It is less than 6 feet in depth, and is drained yearly for maintenance and repairs. While it does provide lacustrine habitat (and southern long-toed salamander have been observed in the pond), it does not provide riparian habitat nor does it constitute a fragile ecosystem, as the comment suggests. Impacts to Cushing Pond are addressed in Section 4.14.

Impacts related to noise and visual resources are also addressed in the Draft EIS/EIR, in Sections 4.9, "Noise," and 4.2, "Visual Resources," respectively. In particular, please refer to Appendix D, View 21 -KT Sundeck/Condo Area -Alternative 2 (Figure D-21b) for a visual simulation of what the Squaw Valley base terminal may look like with implementation of Alternative 2.

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0080

Dan Hudson

Shirlee Herrington

From: sereena irby <sereena100@gmail.com>
Sent: Monday, June 11, 2018 10:05 AM
To: Placer County Environmental Coordination Services
Subject: Granite Cheif Squaw-Alpine Gondola oppose

0081-1 | With so much land constantly being developed and swallowed up, preserving the wilderness we have left is so incredibly important. We cannot rebuild the wild. 100% oppose the Gondola and any other developement. Thank you for your time.

Sereena Irby

0081-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0082**Shirlee Herrington**

From: sydney irby <sydneyirby@gmail.com>
Sent: Monday, June 11, 2018 2:20 PM
To: Placer County Environmental Coordination Services

0082-1 | I am opposed to building squaw alpine gondola. Please do not build.

0082-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0083

Date submitted (Pacific Standard Time): 5/4/2018 8:36:37 AM

First name: Bill

Last name: Jager

Organization:

Title:

Official Representative/Member Indicator:

Address1: PO Box 228

Address2:

City: Dutch Flat

State: CA

Province/Region: California (CA)

Zip/Postal Code: 95714

Country: United States

Email:

Phone:

Comments:

My family is a long time landowner, resident and user of public lands in Placer County and the greater regional Tahoe area. I support this project and the further development of the Squaw Valley/Alpine Meadows ski area lift facilities as well as expansion of the ski-able area.

Taken in the context of the entire undeveloped Tahoe Basin which is made up of hundreds if not thousands of square miles and which the vast majority of humans never will reach or make the effort to reach beyond a paved road, this development's potential negative impacts are de-minimis in scale and are far outweighed by the joy experienced by many skiers in the future.

0083-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0084

Shirlee Herrington

From: jbarnhart1@frontiernet.net
Sent: Sunday, May 06, 2018 4:16 PM
To: Placer County Environmental Coordination Services
Subject: Squaw Alpine Base to Base Gondola

Dear Placer County,
 I am a property owner at the Squaw Valley Lodge in Olympic Valley.
 I have reviewed the Draft EIR/EIS for the above referenced proposed project.

0084-1

Please approve Alternative 4 for the following reasons :

- This will improve utilization of both Squaw and Alpine ski resorts and enhance the guest experience.
- It will reduce vehicle trips between Squaw and Alpine.
- It minimizes impacts to the 5 Lakes Basin and Granite Chief Wilderness.
- It entirely avoids impacts to the Cushing Pond amenity and drainage hydrology.
- It avoids traffic, light, noise, and construction impacts to the existing Squaw Valley Lodge residents and guests.
- It avoids worsening the existing opposing skier traffic hazard of Alternatives 2 & 3 near the base of the KT22 chair.
- Currently there are skiers coming down Mountain Run heading east, coming down KT22 headed north, and leaving the Village headed west all with destinations of Squaw One chair, KT22 chair, and the Tram all intersecting between KT22 and Squaw One chairs.
- Adding the Gondola base station into this mix will worsen an already hazardous situation.

Thank you for your consideration.
 John Barnhart.
 Squaw Valley Lodge Unit 352.

0084-1, Public Safety (PS)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

The comment lists the reasons why Alternative 4 should be approved, including minimized impacts related to traffic, wilderness, Cushing Pond, drainage/hydrology, light, noise, and public safety; these issues are addressed in the Draft EIS/EIR.

With respect to public safety, the Squaw Valley base terminal under Alternatives 2 and 3 would be positioned within the area of Cushing Pond and would be largely outside of the existing ski run area in the vicinity of KT22 Chair, Squaw One Chair and the Tram. Additionally, the Squaw Valley base terminal under Alternatives 2 and 3 would be elevated above the ground to allow skiers to pass underneath the lift to transfer from west to east or east to west, as they do now. Alternative 4 would represent only a minor improvement to skier circulation at the base of KT22 Chair, Squaw One Chair and the Tram when compared with Alternatives 2 and 3.

0085

Will Hollo

From: Carrie Johnson <girlizard@hotmail.com>
Sent: Saturday, May 26, 2018 4:39 PM
To: Scoping Comments; cdraecs@placer.ca.gov
Subject: gondola comment submission

Hi,

- 0085-1 I am writing in to add my comments about the proposed Squaw gondola project. I am strongly opposed to the construction of this project and I fully support Alternative #1-NO ACTION.
- Reason #1: I have lived in the Tahoe City area since 1992 and have never desired a connecting lift from Alpine to Squaw. A major reason I enjoy Alpine Meadows is because it is its own resort with its own identity and is different from Squaw. As a longtime local, I often prefer the solitude and lesser crowds that Alpine provides on a ski day. I feel the gondola will only increase human traffic at Alpine, which I understand may be the interest of KSL, but locals who have skied Alpine for years obviously would prefer not to have increased skier visits. I also ski Squaw frequently and enjoy the different experience that Squaw provides. I have no desire or would I ever ride in a gondola to go back and forth from each mountain.
- 0085-2 Reason #2: I am VERY concerned that Alternative #2 is even being considered! This option should not even be an option, for many reasons!! Firstly, it is proposed to pass through important critical habitat for the Sierra Nevada Yellow Legged frog while flanking Barstool Lake, a federally listed endangered species. I have explored the Barstool Lake area and have seen one of these frogs in the pond up there with my own eyes, so I know firsthand there is an individual up there. There should not be any manmade structures allowed in a federally designated wilderness area either. Part of the magic of the 5 Lakes area is the wildness. I do not want to see gondolas or towers as I go out to enjoy the wilderness. A gondola will increase the amount of foot traffic in this area, as every skier will be able to get a visual of the area from the gondola and some will make it a point to try to access these areas. Both Barstool and Estelle Lake are a unique pocket of wilderness without extensive human use as there is no well-established trail system to these lakes. Leave them alone!
- 0085-3 Reason #3: I do not believe that the addition of a gondola will be environmentally beneficial in any way, as the same amount of humans or maybe more, due to the excitement of the new gondola, will be on the roads. There is a perfectly good shuttle system in place and it could be improved with more frequent shuttle times. A gondola is not needed.
- 0085-4 Reason #4: I am very concerned if one of the alternatives is approved, that there will not be sufficient monitoring for wildlife, vegetation, habitat, etc., during construction. Who will be there to police the construction crews if they come across a species of concern, or go within a particular riparian area, etc?
- 0085-5 Reason #5: All of my friends, who have also lived in the area for years, also do not support this project and do not want a gondola connecting Squaw to Alpine. While I have heard of this "dream" in the works for years, it is not something that is supported in full by the local community, including many employees who work at Squaw or Alpine.
- 0085-6 If the powers that be do decide to approve the gondola, I hope that they will select the option which is least harmful to our environmental treasures, which in my opinion might be Alternative #4. I also hope the decision

1

0085-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0085-2, Wilderness (W2)

The comment expresses concern about impacts to Sierra Nevada yellow-legged frog habitat and the Granite Chief Wilderness as well as other wilderness areas. These issues are addressed in their respective sections in the Draft EIS/EIR. Section 4.14, "Wildlife and Aquatics" identifies that Barstool Lake is occupied habitat for Sierra Nevada yellow-legged frog. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0085-3, Purpose and Need (P&N)

The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, Transportation and Circulation. See the Master Response above related to the Improvements to Existing Shuttle System Alternative in Section 1.8, "Master Responses."

0085-4, Resources Protection Measures/Mitigation Measures (RPM/MM)

Resource Protection Measures (RPM) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. Various RPMs and mitigation measures provide specific monitoring requirements. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the project (included in the Final EIS/EIR) identifies all the RPMs and mitigation measures that would be implemented as well as the timing and responsibility for each measure. Placer County, through the MMRP and permit conditions, has responsibility for monitoring and recording the proper implementation of applicable RPMs and Mitigation Measures. The Forest Service

0085

has a similar responsibility to enforce the ski areas Special Use Permit (SUP), the construction/maintenance plan, and certain RPMs that are specifically within federal jurisdiction.

0085-5, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0085-6, NEPA/CEQA Process (NCP)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0085-6
cont'd | makers will not be swayed primarily by economic and financial considerations, but instead analyze every aspect and heavily weigh the input of those who live year round in the area and are not just visitors or second home owners.

Thank you for taking the time to consider my comments!
Carrie Johnson

0085-6 cont'd, NEPA/CEQA Process (NCP)

0086

2320 Alpine Vista Rd.
Alpine Meadows, CA

mailing address:
890 La Rue Ave.
Reno, NV 89509

July 11, 2018

Dear Members of the Placer County Planning Commission,

0086-1 | My understanding of government agencies is that they are designed to support the public good. For this reason that I am writing to urge you to vote No on the proposed Squaw-Alpine gondola.

The history of the greater Tahoe area reads to me like a constant navigation between the public good—the preservation of the wilderness areas surrounding the lake, of water clarity, of peace and quiet—and the demands of developers and those who support and profit from them. In fact, as you doubtless know, the Tahoe area should have been designated a national park, but wasn't because of existing development. The effects of ongoing and increasing development are well known and include declines in lake clarity, wildlife habitat, and wilderness areas, as well as increasing traffic, large-scale developments just outside the protected area, and more.

I bring up this history because the Alpine Meadows area is one of the most underdeveloped (if also inhabited and accessible) areas in the region. From my cabin in Alpine Meadows, I can see nothing but cliffs and trees and scrub in two directions, and a single house in a third. In fact, like many who live here, I chose to live in this area (as opposed to, say, Squaw Valley) because of the solitude and beauty afforded by the location. The vistas of Alpine offer me a sense of comfort and awe, which is essential to my own wellbeing, and to those of my fellow inhabitants and visitors.

0086-2 | In fact, those two vistas would be directly impacted—and indeed destroyed—by the proposed gondola, especially Plan D.

0086-3 | You are no doubt familiar with many of the arguments already mounted in opposition to the proposed development. Among the most urgent for me are the desirability of preserving the wilderness areas surrounding and visible from the Five Lakes Hike, one of the most popular and accessible hikes in the area. The environmental damage caused by the construction and operation of the gondola is also concerning, as is the increased traffic on a road that already habitually backs up in the winter. Perhaps most worrying is the fact that, overall, ski seasons in the region have grown shorter and, in some seasons, almost nonexistent. Destroying wilderness areas for a development that is contingent on cold, snowy winters is a terrible calculus, since the wilderness areas, once gone, will never return. That the development process itself will contribute to emissions responsible for climate change makes things even worse.

0086-1, Opinion (O1)

The comment is an introductory statement with a portion directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0086-2, Visual Resources (VR)

Impacts related to visual resources are addressed in Section 4.2, "Visual Resources," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0086-3, Other (O2)

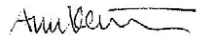
These issues are addressed in the Draft EIS/EIR in Sections 4.1, "Recreation," 4.3, "Wilderness," 4.7, "Transportation and Circulation," and 4.11, "Greenhouse Gas Emissions and Climate Change." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0086

0086-4

It seems clear that the public good, especially in an era of ever more development, forest reduction, wildlife habitat loss, and increased fire danger, is not being served by supporting yet another money-making venture. Please vote with your conscience and preserve this wilderness for future generations.

Sincerely,



Ann Keniston

0086-4, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0087**Shirlee Herrington**

From: Derek Kennedy <j.derek.kennedy@gmail.com>
Sent: Friday, May 18, 2018 12:07 PM
To: Placer County Environmental Coordination Services
Subject: Support for California Express Gondola

Hi USFS/Placer County!

0087-1

I am a big fan of this project because of the improved access for the many people that enjoy the mountains and the positive impact it will have on traffic and car exhaust from reducing driving between the two bases

I hope to see a positive outcome!

Derek Kennedy

1510 Upper Bench Rd
Alpine Meadows

0087-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0088

Will Hollo

From: Gary <gary@kennerley.net>
Sent: Tuesday, May 22, 2018 10:51 PM
To: Scoping Comments
Subject: Squaw Alpine Gondola

Dear USFS/Placer County,

0088-1 | Myself, family and friends have skied and snow boarded at Alpine Meadows and Squaw for over ten years. During that time it has always been a hope that one day the two resorts would be connected to reduce the congestion caused by the number of road trip between the two locations and to enhance access to both ski areas. I support the California Express Gondola because I believe it will reduce traffic congestion, reduce green house gas emissions and enhance visitors experience of both the Tahoe National Forest and two great winter sports locations.

Thank you for your consideration,

gary kennerley
510.219.2935

0088-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0089

Date submitted (Pacific Standard Time): 5/18/2018 8:26:49 AM

First name: Shawn

Last name: Kessler

Organization:

Title:

Official Representative/Member Indicator:

Address1: 4745 North Ridge Road

Address2:

City: Carnelian Bay

State: CA

Province/Region:

Zip/Postal Code: 96140

Country: United States

Email: shawnkesslerdesign@gmail.com

Phone:

Comments:

0089-1

This project is inane. There is absolutely no need to combine these two completely amazing ski resorts. The obvious push by predatory venture capitalists into making "the biggest ski resort ever" is nothing but a selling point. All of the KSL projects are just that, selling points. They just want to increase value and don't care about the consequences. I object to a gondola being built in the Granite Chief Wilderness and I object to this project at its core.

Note that I am a 32 year old local, born and raised here in North Lake Tahoe. I hold an opinion shared by many in my slowly dwindling community. We use this land more than anyone and should be given a chance to be heard.

0089-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

From: Stan Knight <stanknight@pacbell.net>
Sent: Friday, May 18, 2018 3:41 PM
To: Scoping Comments
Subject: Comments in support of the proposed California Express Gondola connecting Squaw Valley and Alpine

0090-1

Hello- I am a 40 year resident of California and have lived in the Bay Area since 1995. Myself and my family, (wife and two sons) are avid visitors to the Lake Tahoe area year round and in particular season pass holders for the Squaw-Alpine resort. We visit the Tahoe area in winter very frequently and consider ourselves passionate about the natural beauty of that area and especially enjoy the winter sports options available.

I would like to express my very strong support for the California Express Gondola and it's construction permit. This will significantly enhance the experience of enjoying the combined aspects of the two distinct ski areas. Today we take the shuttle back and forth and this is far from ideal. It's slow, adds traffic to the already overburdened HWY 89, and makes it very inconvenient to ski both areas within the same day.

I feel the impact to the environment will be quite minimal compared to the value offered to those of us who enjoy the sport of skiing in the High Sierra. We love Squaw Valley and Alpine Meadows both, and would love to see them become truly a single, unified, resort.

Thank you for your time and attention.

Stan Knight

Sent from [Mail](#) for Windows 10

0090-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0091

Shirlee Herrington

From: Tom Lane <alpinesports.lane@gmail.com>
Sent: Friday, June 01, 2018 10:07 AM
To: Placer County Environmental Coordination Services
Subject: Squaw Gondola and Gazex

0091-1 I have been a full time resident and home owner (1544 Cortina Ct) in Alpine Meadows Ca since 1981. I enthusiastically support the Gondola project as a major benefit to our community. This project will greatly reduce traffic and make Squaw Valley more competitive as a major resort. Just look at what Vail did with the merger with the Canyons and Park City Utah. AND by the way that took under a year to take effect. The gondola project will allow a flow of skiers to go back and forth without having to get into their cars or take a shuttle. Squaw skiers will now have the opportunity to explore and enjoy Alpine Meadows which in the long term should encourage the Corporation to update some of their lifts. Squaw has committed to only running this lift in the winter so the overall impact should be minimal.

In regard to Gazex this seems like a necessary evil to reduce the effect of avalanches. The noise is irritating but I would say that it is relatively infrequent and only in major snow storms. I believe that the alternatives such as snow fencing (Europe is full of them along with Gazex) have been studied and evaluated and that the Gazex remains as the best alternative beyond risking ski patrolman and dynamite as we have done in the past. So at this point I would approve of Gazex.

Again I encourage the board of supervisors and National Forrester to approve this Gondola project as fast as possible.

Thanks
 Tom Lane

--
 Tom Lane

(530) 412-2648

0091-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

This comment also refers to the Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Will Hollo

From: Nils Larsen <nils@altaiskis.com>
Sent: Monday, June 11, 2018 6:29 PM
To: Scoping Comments
Subject: New Gondola

To whom it may concern

0092-1

I am writing about the proposed Gondola connecting Alpine Meadows and Squaw Valley. Though I am an avid skier and have skied at both resorts many times I am completely apposed to this new development. It further erodes what little wild area remains in this region and will drastically alter the visual and physical make up the of the area in question (not to mention noise). The addition of 8 Gazex will further degrade the area and take it one more step down the road of industrial recreation.

The FS purpose of developing recreation has already been met - exceeded in my opinion - and this will only further the excess. The reasoning of differences in terrain between the 2 areas is at best specious, they have been doing fine accommodating all manner for skiers for many years. As stated the alternative 1 is the environmentally superior alternative. Rather than further increasing the amenities lets for once go with what is better for the environment

Placer county has caved to Squaw Valley's expansion desires at the expense of the environment at every turn, lets put some sort of reasonable balance going forward.

Alternative 1 - no gondola !

best regards, Nils Larsen

Nils Larsen
nils@altaiskis.com
www.altaiskis.com
www.skishoeing.com
 509.779.0030

0092-1, Opinion (O1)

Impacts related to wilderness and visual resources are addressed in Sections 4.3, "Wilderness," and 4.2, "Visual Resources," respectively, of the Draft EIS/EIR. Noise impacts are addressed in Section 4.9, "Noise."

This comment also refers to the Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Regarding the comment that the Forest Service purpose of developing recreation has already been met without the project, the *Tahoe National Forest Land and Resource Management Plan* explicitly mentions the potential that exists to connect certain ski areas along the Sierra Nevada crest, which would provide improved dispersal and opportunities for skiers (for additional discussion, see page 4.1-4 of the Draft EIS/EIR). Other regulatory direction provided by the Forest Plan supports the Purpose and Need for this project; please refer to the discussion on page 4.1-4 of the Draft EIS/EIR.

Finally, the comment states that Alternative 1 is the environmentally superior alternative. This is not entirely correct. Section 5.2.4 of the Draft EIS/EIR explains the CEQA requirement to identify the environmentally superior alternative and that if the environmentally superior alternative is the "no project" alternative, the EIR must identify an environmentally superior alternative among the other alternatives. As described on page 5-13 of the Draft EIS/EIR, from the standpoint of minimizing environmental effects, Alternative 1 is the environmentally superior alternative; however, Alternative 1 would not meet any of the basic project objectives. The Draft EIS/EIR, as required by CEQA, then compares the impacts of Alternatives 2, 3, and 4, and the results are discussed on pages 5-13 through 5-15. Overall, Alternative 4 is determined to have less of an adverse environmental effect compared to Alternative 3, and is considered to be the environmentally superior alternative.

0093

Will Hollo

From: Sondrea Larsen <sondrea7@gmail.com>
Sent: Monday, June 11, 2018 1:02 PM
To: Scoping Comments
Subject: gondola alpine to squaw

To whom it may concern,

0093-1 | I strongly oppose the building of a gondola between Alpine and Squaw Valley. Limited access to this area has kept the valleys below relatively un-impacted by humans. I grew up fishing in and exploring these valleys. As stewards of this pristine wilderness, I believe it is our responsibility to protect the vulnerable ecosystem of plants, animals and clean water. Please consider prioritizing the protection of this unique ecosystem over potential financial gains.

Respectfully,

Sondrea Larsen

0093-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Shirlee Herrington

From: Mitchell Larson <mitch@ondeckclothing.com>
Sent: Friday, June 01, 2018 9:59 PM
To: Placer County Environmental Coordination Services
Subject: In Favor

0094-1 | As a life long skier of Squaw and Alpine I support this project.

Mitchell E Larson
 Owner / Buyer
 On Deck Clothing Inc.
 Door County USA

0094-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0095**Shirlee Herrington**

From: DLeeCA <d2lee2s2@comcast.net>
Sent: Tuesday, May 22, 2018 7:05 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: Squaw Valley | Alpine Meadows Gondola Project EIS/EIR COMMENTS

0095-1 | TRAFFIC

Beside the required Mitigations in the EIR, the following should be accomplished for EIR approval:

A traffic/pedestrian **light** should be installed at Christy Hill Road and Squaw Valley Road for Pedestrian Safety and traffic flow because of (1) traffic left turning into the ski area parking lot while (2) all hillside residence vehicle and pedestrian traffic are accessing/leaving the ski area parking lot.

Highway 89 is widened to 4 lanes with an additional 2 lane tunnel under the railroad tracks in Truckee.

I am an owner/user of a Squaw Valley condo and an Oakland, CA resident.

Dennis Lee

0095-1, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment suggests that a traffic/pedestrian light be installed at Christy Hill Road/Squaw Valley Road intersection for pedestrian safety and traffic flow purposes. A traffic signal was not recommended at this intersection because it is part of the three-lane coning program and has variable lane assignments to accommodate surges in inbound and outbound travel. Introduction of a traffic signal at this intersection would not benefit operations as vehicle and pedestrian right-of-way is already manually assigned by traffic control officers. The comment also suggests that State Route 89 be widened to four lanes. As is described on page 4.7-15 of the Draft EIS/EIR, Caltrans does not consider widening of SR 89 to be feasible due to topographic constraints and the environmental sensitivity of the area.

From: Barbara Levin
To: [Scoping Comments](#)
Subject: California Express gondola
Date: Monday, May 21, 2018 5:58:43 PM

Dear USFS/Placer County,

I support the California Express Gondola because it will have minimum impact on the environment and will stop buses from going back and forth from the mountains

I think this gondola is a great idea.

Barbara levin

0096-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0098**0098-1, Opinion (O1)**

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0098-1

Ross Lewis
PO Box 6633
Tahoe City, CA
96145

After the meeting at King Beach I would like to make a few comments.

There is no doubt that the gondola project will leave an impact on the wilderness area.

This cannot be returned to the original state.

Future generations will not have the good luck to experience the area if the project is to go thru.

Please let the decision to change the area to a futur time.

Yours sincerely, Ross Lewis

Shirlee Herrington

From: June Lund <junelund@aol.com>
Sent: Tuesday, May 01, 2018 9:02 AM
To: Comments@squawalpinegondola-eis.com
Cc: Placer County Environmental Coordination Services
Subject: Squaw Valley/Alpine Meadows Base-to-Base Gondola

Attention: U.S. Forest Service, Tahoe National Forest, Truckee Ranger District; c/o NEPA Contractor
Shirlee Herrington, Environmental Coordination Services

0099-1 | This email is in response to the Public Review and Comment Period regarding the Base-to-Base Gondola Project between Squaw Valley and Alpine Meadows.

My husband, John Lund, and I own and have owned a condo at 201 Squaw Peak Road, Unit 302 for more than 25 years. Our condo faces the ski area, the KT chair, and Lake Cushing. We totally support the Base-to-Base Gondola. We believe the extensive background and research into the implementation of this gondola will have minimal environmental impact and will not diminish views. We believe it will be an asset to the area in offering a unique and upgraded lift option between the two ski areas. The Gondola will also relieve ski traffic from the KT chair.

We hope this project is approved.

Regards,
June Lund and John Lund
201 Squaw Peak Road
Unit 302
Olympic Valley, CA 96146

650-740-7771 June Lund Cell

0099-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0100

Shirlee Herrington

From: Gavin Lura <gavin@lura.us>
Sent: Monday, June 11, 2018 4:03 PM
To: Placer County Environmental Coordination Services
Subject: Squaw Valley Alpine Meadows Gondola

0100-1

As a concerned, lifelong resident of Squaw Valley, I am writing to you with my comments regarding the proposed gondola project.

The environmental impacts of the proposed "Base to Base" gondola outlined in the EIR/EIS far outweigh the supposed benefits to this project. In my opinion, the visual impact alone is too much to allow this to move forward. However, there are numerous other permanent, irreversible impacts to the area that make it unconscionable to be approved.

There are already over FORTY lifts between the two distinct resorts - thirteen at Alpine Meadows and thirty at Squaw Valley. Haven't we seen enough environmental impact from the installation of an already excessive number of lifts? Now the idea is to create another massive lift that cuts along wilderness area through nearly untouched public lands?

When is enough, enough? When will the line be drawn?

I think a cost-benefit analysis is important to make. Do the environmental costs really seem worth it for the supposed benefits? Also, who really benefits from this project? The people that will be able to park their car at Squaw Valley and ride the gondola over to Alpine? I suppose there is a small benefit to the public, but Squaw Valley Alpine Meadows is who really stands to benefit from this project.

The purpose of this project is not to open any additional terrain for skiing, but simply to link two resorts owned by the same company. In an effort to compete with other "destination" resorts like Whistler Blackcomb in Canada, that touts a "Peak to Peak" gondola, Squaw's "Base to Base" gondola proposal is primarily a marketing gimmick, being pursued so SVAM can claim to have the most connected skiable acreage in the United States. The name choice of "California Express" also alludes to this fact. Additionally, SVAM wants to maximize the number of visitors and increase revenues in the Village at Squaw Valley. Simply put, they want to shuttle tourist's wallets from Alpine Meadows to the Village at Squaw Valley.

So, are all of the environmental impacts really worth having, just so SVAM can increase their revenues? For me the answer to that question is a resounding and obvious "NO".

Thank you,

Gavin Lura
 Lifetime Squaw Valley Resident
[530.320.1018](tel:530.320.1018)
GAVIN@LURA.US

0100-1, Opinion (O1)

Impacts related to visual resources and wilderness are addressed in Sections 4.2, "Visual Resources," and 4.3, "Wilderness," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

Regarding the cost-benefit analysis comment, the lead agencies will weigh the environmental impacts (including those related to public interests) and benefits of the project when making decisions regarding the project. The decision documents (including the CEQA Findings and the NEPA Record of Decision) will provide the decisionmaker's detailed rationale on how the project would or would not serve the public interest.

Will Hollo

From: John Lyons <lyons_johnny@sbcglobal.net>
Sent: Tuesday, June 12, 2018 2:08 PM
To: Scoping Comments
Subject: Squaw Valley | Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR SCH# 2016042066

0101-1 | I am in agreement with Alternative 4

Thank you

John Lyons
[Livin' the Dream inc. Sales](#)
[530-386-1408](#) Cell [530-582-8700](#) fax
lyons_johnny@sbcglobal.net

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0101-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0105

Shirlee Herrington

From: Ciro Mancuso <ciro.m@me.com>
Sent: Wednesday, May 30, 2018 1:52 PM
To: Placer County Environmental Coordination Services
Subject: Squaw Alpine Gondola

0105-1 | I have lived in Squaw Valley for thirty five years. My family and I have always dreamed of a gondola connecting Squaw and Alpine for many reasons. It will save traffic, give the skier and non-skier a better experience, and make the two areas much better unified. The arguments I have heard against the gondola simply make no sense and are not based in scientific reality. The gasex avalanche control system is more efficient and much safer for mountain safety and ski patrol. Anyone who has traveled to ski resorts in Europe will recognize the benefits of the system. Yes, it is noisy, but so are dynamite charges that expose our ski patrollers to so much unnecessary risk.

I fully support the Gondola and hope the Placer County Board of Supervisors approves the project.

Respectfully,
Ciro Mancuso

0105-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

This comment also refers to the Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Shirlee Herrington

From: doug maner <doug2205@gmail.com>
Sent: Wednesday, May 23, 2018 6:26 AM
To: Placer County Environmental Coordination Services
Subject: Fwd: Oppose Squaw Alpine gondola

0106-1

I oppose the squaw Alpine gondola. It's violating the spirit if not the language of the wilderness act.

This type of infrastructure does not belong in the wilderness.

Further, highway 89 and the roads to Squaw and Alpine can't handle the increased traffic this will generate.

I am a former national ski patroller at Alpine and can tell you first hand that the resort can't handle the existing crowds the proposed gondola will create.

I am have owned a second home in Tahoe for over a decade and hike and ski this terrain frequently.

Thanks for listening.

Doug Maner
 5412 mayberry
 Riverbank ca 95367
 209 581 2985

0106-1, Opinion (O1)

Potential wilderness and traffic impacts are addressed in Sections 4.3, "Wilderness," and 4.7, "Transportation and Circulation," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

Regarding the comment about skier capacity at Alpine Meadows, as described on page 4.1-10 of the Draft EIS/EIR, a skier visitation and use assessment (Appendix C of the Draft EIS/EIR) was prepared for the project. As stated therein, the project's increased visitation "is not anticipated to adversely affect the guest experience or lead to substantial deterioration of any ski area facilities because existing guest service facilities at Alpine Meadows and Squaw Valley are sufficient to support this increase in use. Alternative 2 would not cause the maximum skier capacity of 17,500 people per day at Squaw Valley (described above) to be exceeded; this proprietary data has been reviewed and confirmed during the preparation of this Draft EIS/EIR."

0107**Will Hollo**

From: Edward Manzi <emanzzz123@gmail.com>
Sent: Wednesday, May 23, 2018 10:04 AM
To: Scoping Comments
Subject: Against Gondola

0107-1 | I am against the gondola between Squaw and Alpline! it will take away from what wilderness is supposed to offer.

Ed Manzi

0107-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0108

Date submitted (Pacific Standard Time): 5/3/2018 3:09:44 PM

First name: Edward

Last name: Manzi

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City: Tahoe City

State: CA

Province/Region:

Zip/Postal Code:

Country: United States

Email: emanzzz123@gmail.com

Phone:

Comments:

I think connecting the two resorts by a tram is an awful idea. It ruins the natural beauty found between the two resorts. This especially affects the Five Lakes Trail.

I also think it will destroy the natural feel that Alpine Meadow has. Instead of Alpine having its own distinct natural feel to it, it will become just another part of Squaw, which is much different.

It will be really sad if this goes through.

0108-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0110**Shirlee Herrington**

From: carol mazerall <cmazerall@gmail.com>
Sent: Sunday, June 10, 2018 9:10 AM
To: Placer County Environmental Coordination Services
Subject: No on Gondola

0110-1 | I strongly oppose approval of the SquawAlpine Gondola Plan. Enough development has already impacted the area. Enough access is available via the ski areas and from the ski areas. We do not need to push further into our limited Wilderness areas. We need to preserve what is left at all costs.

Thank you for accepting this public comment.

Sincerely,

Carol Mazerall
PO Box 1148 Carnelian Bay CA 96140

0110-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Shirlee Herrington

From: cheri ann <carmelflowerstudio@yahoo.com>
Sent: Wednesday, May 02, 2018 10:56 AM
To: Placer County Environmental Coordination Services
Subject: Squaw Valley Base to Base Project

Page One of Two

May 1, 2018

Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive
 Auburn, CA. 95631

Dear Sirs,

0112-1 I am writing in response to, and in opposition to the Draft EIS, Squaw Valley/Alpine Meadows Base to Base Gondola project. I am a 21 year homeowner at Squaw Valley Lodge and my apartment location is on the ground floor, in front of Cushings Pond. I was alarmed and disappointed that the location directly in front of our home is still under consideration for placement of the base station. Would you like to have 1,400 people an hour right outside your window causing commotion, noise, and disturbance for possibly 6 months of the year, from 8 to 6 pm, complete with lights, noise and vibration? I think not. This will affect the entire Building 3, housing hundreds of owners and their guests. Also stated in the Draft EIS was the fact that even in the summer, the gondola would be running 10 times, from three to 5 days a month.(Page 2-1 4) The proposed gondola location would be next to the residential building, "Squaw Valley Lodge." It would impede our owners and guests our much coveted and valuable ski in/ski out ability by the hardscape between Olympic House and the Gondola. Cushings Pond, a long time cherished location, and a favorite scene of events would be negatively impacted or destroyed. The gondola area would be too crowded, and too close. It would destroy the peace and views we purchased and hold dear,

0112-1, Opinion (O1)

Operational noise from the proposed gondola is addressed as Impact 4.9-3 in Section 4.9, "Noise," in the Draft EIS/EIR. Lighting impacts are addressed as Impact 4.2-3 in Section 4.2, "Visual Resources," in the Draft EIS/EIR, which also addresses other visual impacts such as impacts to views. The comment is correct in that maintenance would be performed in the summer, necessitating some cabins to be put on the line for limited periods during the summer (fewer than 10 times during the summer for running all cars on the line, and 3 to 5 days per month for limited numbers of cars moved across the line) (see page 2-14 of the Draft EIS/EIR).

The hardscape would extend only to the east of the base terminal and therefore would not impede ski in/ski out access to/from the Squaw Valley Lodge on the west side of the base terminal.

Impacts to Cushings Pond are addressed in Sections 4.2, "Visual Resources," and 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR.

01120112-1
cont'd

along with our property value. To subject the residents of Squaw Valley Lodge to 6 to 8 months of construction mere feet from their homes is unspeakable, as well as causing a lifetime of winter disturbance from the stated 1,400 skiers every day every hour from that point forward. The view, formerly of the mountains, meadow and pond would now be a building to store the gondolas and a gondola base station. I can already hear noises from the operation of KT-22, and it is much further away than the proposed new gondola. Can you imagine the noise of the skiers and machines that close to the residential buildings?

The better alternative would be alternative 4, placing the lift by the Tram Building and Red Dog. That area would be easily accessible from the parking lot, Members Locker room, and the entire ski area. It makes sense, especially since there is no one living there, and it is the most central meeting area for all of the lifts and tram. It is a much shorter walk for skiers in boots with equipment, and it is in a more commercial area already, not **a residential area.**

Page 2 of 2

0112-2

If I am reading the Draft EIS correctly, alternative 4 would be less invasive...roughly HALF the permanent ground disturbance, less aerial ropeway length, less towers, and less vegetation removal. Apparently, as stated in the Draft EIS, alternative 4 is also the least harmful to the Sierra Nevada Yellow Legged Frog.

I implore you to NOT place the Base Station next to the Squaw Valley Lodge. We cannot move the Lodge, but you can place your project in the more acceptable, desirable and central location...next to Red Dog and the Tram building.

Thank you.

Respectfully,

Cheri A. McCarty
Unit 143, Squaw Valley Lodge.

P.O. Box 37
Carmel, California 93921

Cc: file

0112-1 cont'd, Opinion (O1)

0112-2, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Will Hollo

From: Sharla Menlove Chador <menlovechador@gmail.com>
Sent: Wednesday, June 6, 2018 2:39 PM
To: Scoping Comments
Subject: Squaw/Alpine Gondola Comments



U.S. Forest Service, Tahoe National Forest, Truckee Ranger District, NEPA Contractor,

0113-1 Thank you for the opportunity to comment on this very important issue. I am a homeowner and full time resident of Alpine Meadows for the last 13 years. Over the years my family and I have hiked the Five Lakes trail and accessed Granite Chief Wilderness every single month of the year, on January 1, and on the 4th of July, depending on the snow pack. I have hiked this trail easily a thousand times, just as I did today. Were you in one of the helicopters flying the gondola line between Squaw and Alpine today, June 5th? If you so
 , maybe you saw me, on the trail below.

I love this trail. I am not alone. You have a solid understanding of the vast number of people who make the strenuous climb to Five Lakes in hopes of experiencing the wild freedom and connection to nature that society has helped us lose. Please don't take this from us, from our children, and from future generations, we need it now more than ever.

The stunning landscape in the photo above is the site of the proposed gondola's mid-way station

1

0113-1, Opinion (O1)

Potential impacts to the Five Lakes Trail and the Granite Chief Wilderness area are addressed in Sections 4.1, "Recreation," and 4.2, "Visual Resources," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

The comment notes that the environmentally superior alternative (Alternative 4) would have 33 adverse environmental impacts. Table 2-3 in the Draft EIS/EIR summarizes the impacts of all the alternatives, and the comment is correct in that Alternative 4 would result in 33 NEPA conclusions of adverse effect, as shown in this table. However, many of the CEQA conclusions for the same impacts are less than significant with mitigation, meaning that these impacts can be reduced below thresholds of significance with implementation of mitigation measures identified in the Draft EIS/EIR. In fact, the only significant and unavoidable impacts associated with the project include impacts to visual resources (Impact 4.2-2), impacts on vehicular queuing at Caltrans intersections (Impact 4.7-4), cumulative traffic impacts (Impacts 4.7-11 through 4.7-13) and construction noise impacts (Impact 4.9-1); these are summarized in Section 5.2.1, "Significant Environmental Effects that cannot be Avoided," of the Draft EIS/EIR.

This comment also refers to the Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

01130113-1
cont'd

, can you imagine?
Even the project's most *environmentally superior* route would have 33 adverse environmental impacts on important Tahoe values; including traffic, loss of wildlife habitat, and destruction of the unique Sierra experience the Forest Service calls "solitude or primitive unconfined recreation." In addition, residents would be subjected to additional deafening gasex explosions.
A
sk yourself for what?

In the words of Albert Einstein, *Look deep into nature, and then you will understand everything better.*

If you have experienced this area on foot, you know it is soul stirring, a respite from the noise, a calming connection. Don't allow it to be destroyed.

Respectfully,

Sharla Menlove Chador
Alpine Meadows Resident

This e-mail and any attachments are confidential. If you are not the intended recipient of this e-mail, please immediately delete its contents and notify us. This email was checked for virus contamination before being sent - nevertheless, it is advisable to check for any contamination occurring during transmission. We cannot accept any liability for virus contamination.

0113-1 cont'd, Opinion (O1)

Will Hollo

From: Haley Meyer <haymey19@gmail.com>
Sent: Monday, May 21, 2018 10:18 AM
To: Scoping Comments
Subject: California Express

0114-1

Dear USFS and Placer County,
I am emailing in strong support of the California Express. As someone who was raised in Squaw Valley I know how much the valley has always hoped for a base to base gondola for many reasons. This allows for safer and easier transportation from Squaw Valley to Alpine Meadows. This will decrease road traffic and mediate safety issues as well as create a more environmentally conscious way of traveling. It will also allow for easier access to all the amazing terrain that Squaw and Alpine have to offer. For these reasons and many more I, and many other locals from the basin, are in support of this. After decades of talking about and hoping for the base to base to exist it is time to make the California Express a reality! Thank you!

--

Haley Meyer
haymey19@gmail.com
(530)305-2935

0114-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0115

Shirlee Herrington

From: Roger D Miles <rmiles1600@comcast.net>
Sent: Thursday, May 10, 2018 1:13 PM
To: Placer County Environmental Coordination Services
Subject: Re: Squaw Valley Lodge - Important Notice - Base to Base Gondola

0115-1 | As an owner of unit 322 at Squaw valley lodge and an interested party I would like to support alternative route number 4.
Sent from my iPad

> On May 10, 2018, at 11:46 AM, Squaw Valley Lodge - Evan Benjaminson <evanb@gpeak.com> wrote:
>
> cdraecs@placer.ca.gov

0115-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Date submitted (Pacific Standard Time): 6/7/2018 11:56:34 AM

First name: Jareb

Last name: Mirczak

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1192 Statford Way #252

Address2:

City: Tahoe Vista

State:

Province/Region: CA

Zip/Postal Code:

Country: United States

Email: jebmirc@yahoo.com

Phone:

Comments:

0116-1 | Although a gondola certainly benefits Squaw Valley Alpine Meadows, these benefits must be weighed against the adverse effects on the surround environments and the community members who use them. After reviewing the Environmental Impact Report, it appears that there are significant differences in the three gondola routing options.

Alternate 2 has the most adverse effects because it reduces the wilderness character of the Granite Chief Wilderness, it violates a policy of the Placer County General Plan, and it stresses the Sierra Nevada Yellow-legged Frog, an endangered species. In contrast, Alternate 4 has a much lower impact in all three of these categories, yet still accomplishes the project goal.

0116-2 | A primary consideration for this project should be protection of the Granite Chief Wilderness, the Five Lakes Trail, and users of both these valuable resources. Wilderness areas have a distinct and important designation that should be respected. There are two important characteristics from the 1964 Wilderness Act. 1) A wilderness has the imprint of man's work substantially unnoticeable. This quality is degraded by the presence of structures or mechanical transport that increases people's ability to occupy or modify the environment 2) A wilderness has outstanding opportunities for solitude or a primitive and unconfined recreation. This quality is degraded by settings that reduce these opportunities, such as visitor encounters, signs of modern civilizations, and recreation facilities

Alternate 2 would position a gondola along the ridgeline and only 75 feet from the Granite Chief Wilderness. The infrastructure would be visible from within Granite Chief Wilderness year-round. In addition, users of the Five Lakes Trail would pass beneath the gondola line in an area where the recreational experience is already very remote. This option would increase the developed nature of the landscape, reduce opportunities for solitude, and take away from the primitive experience. Even though no structures will be built within the wilderness boundary, the adverse affect due to close proximity is unacceptable.

Why implement these negative impacts on the Granite Chief Wilderness and users of the wilderness when there are other options. Alternates 3 and 4 both pass significantly farther from the wilderness boundary and run up the Catch Valley instead of the ridgeline. These options accomplish the project goal without so adversely affecting the wilderness experience for the rest of the community.

0116-3 | The Placer County General Plan (policy 1.K.1) requires that new development in scenic areas is planned and designed in a manner that avoids locating structures along ridgelines. Alternate 2 directly violates this policy as it would locate structures along a lengthy portion of the ridgeline separating the Granite Chief Wilderness and the Caldwell property. The listed mitigation measures seem to cover only the color of towers and cabins. In my opinion, this does little to mitigate the policy violation. The views in Appendix D show obvious ridgeline structures. Based on this, I feel that Alternate 2 is not viable.

0116-4 | The Sierra Nevada Yellow-legged Frog is an endangered species. These frogs have been observed in Barstool Lake as recently as July of 2017.

Alternate 2 places the Alpine Meadows mid-station near Barstool Lake. The mid-station has the potential of directly affecting Barstool Lake through sedimentation, hazardous material spills, and other physical disturbances generated by construction activities and operation of the gondola. Increased hiker, skier, and snow machine traffic around Barstool Lake would reduce habitat quality and could cause the frogs to

0116-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0116-2, Wilderness (W2)

The comment summarizes potential impacts of Alternative 2 on the GCW and other wilderness areas, and expresses a preference for Alternatives 3 and 4. Impacts to the GCW are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR.

The remainder of this comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0116-3, Visual Resources (VR)

CEQA requires only that inconsistencies with general plan goals and policies be identified and discussed (CEQA Guidelines, §§ 15125, subd. [d]). The Draft EIS/EIR does this (please refer to Draft EIS/EIR, pp. 4.2-23 thru -24). Further, Policy 1.K.1 was not adopted as a threshold of significance under CEQA, so it does not dictate a new significant impact finding as to Impact 4.2-1 (Consistency with Federal, State and Local Regulations). Thus, a new significant impact finding is not warranted under CEQA.

The Final EIS/EIR has been updated to further clarify that all alternatives would be, to a certain degree, inconsistent with Placer County General Plan Policy 1.K.1 which states: "The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

- a. Avoids locating structures along ridgelines and steep slopes;
- b. Incorporates design and screening measures to minimize the visibility of structures and grated areas;

0116

c. Maintains the character and visual quality of the area."(Placer County General Plan, p. 39)."

By their very nature, gondolas and ski lifts must extend along steep slopes to achieve their purpose. Given that the gondola is intended to connect the two ski resorts, all three action alternatives must also cross over the ridgeline which separates the two valleys. As such, it is not possible for the gondola to avoid slopes and ridgelines, but rather the design must rely on other means to screen and minimize the visible impacts of the infrastructure. Specifically the design of each alignment takes advantage of existing topography and vegetation to shield views as well as incorporates design standards via RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3. It is acknowledged that the Alternative 2 alignment traverses a lengthy distance of the sparsely vegetated ridgeline, whereas Alternatives 3 and 4 cross over the ridgeline in one discrete location before diving down into Catch Valley, thus limiting the visible impacts of the Alternative 3 and 4 gondola infrastructure to a greater extent than under Alternative 2. With these design measures in place, all three gondola alignments achieve consistency with the goals and policies of Policy 1.K.1.

0116-4, Wildlife and Aquatics (W&A)

The comment summarizes potential impacts of Alternative 2 on Sierra Nevada yellow-legged frog. Impacts to Sierra Nevada yellow-legged frog are addressed in Section 4.14, "Wildlife and Aquatics," of the Draft EIS/EIR and the information provided in the comment is consistent with that provided in the Draft EIS/EIR.

The comment also expresses a preference for Alternative 4 over Alternative 2. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0116

0116-4
cont'd

displace away from their breeding habitat.

Again, I argue why construct a plan that interferes with an endangered species when there is a better option. Alternate 4 avoids Barstool Lake entirely and causes less than half of the land cover loss and upland habitat disturbance as Alternate 2. It is the least adverse to the Sierra Nevada Yellow-legged Frog yet still accomplishes the project goal of connecting the ski areas.

0116-5

Based on impact to the Granite Chief Wilderness, compliance with Placer County policies, and protection of the Sierra Nevada Yellow-legged Frog, I feel that best gondola routing is clear. Alternate 2 has significant adverse affects in all three categories. Alternate 4 has the least impact.

0116-4 cont'd, Wildlife and Aquatics (W&A)

0116-5, Summary (S2)

The comment provides a summary of detailed comments provided above. See responses to the detailed comments above.

0117

To: United States Forest Service
c/o NEPA Contractor
P.O. Box 2729
Frisco, CO 80443

Attn: Eli Ilano, Forest Supervisor
(via email) comments@squawalpinegondola-eis.com
(via website) Project Website: <http://squawalpinegondola-eis.com/comment/>

Subject: Squaw Valley-Alpine Meadows Base-to-Base Gondola Project NOI
Scoping Comment

Dear Mr. Ilano,

After reviewing the Draft Environmental Impact Statement for the Squaw Valley-Alpine Meadows Base-to-Base Gondola Project I would like to provide you with the following written comments and concerns as well as a formal record of my contention with the project in its current proposed form. There are a few areas that I would like to see given further consideration in the final EIS.

- 0117-1 | My strong opinion against this gondola project and the negative impacts it will have on our local environment have not changed after examining the draft EIS. After examining KSL's preferred gondola route and the other proposed, alternative gondola routes, with the different mid-station locations and development schemes, I believe that Alternative #4 is really the only option that should even be considered at this point in time. Alternative #2 is far too detrimental to both the land and wilderness experience of people using the Granite Chief Wilderness as well as probably being the worst thing possible that could happen to the last of the struggling SNYLF population remaining in Critical Habitat Five Lakes Subunit. Alternative #3 doesn't do enough to preserve the wilderness experience that Congress intended when it designated the boundaries of the Granite Chief Wilderness. So Alternative #4, as flawed as it may also be, is the only gondola option that seems viable and would still allow the Forest Service to operate according to its standards and ethical obligations. It allows the Forest Service to protect the wilderness area, its non-human residents and the wilderness view shed while also allowing the private property owners to realize their goals and objectives with the construction of a gondola to connect the two resorts.
- 0117-2 | The Forest Service has obligations under FSM 2670.31 to protect the SNYLF. These obligations need to be taken very seriously. One of two proposed mid-stations in Alternative #2 would be located next to a pond that is some of the last remaining known habitat for a federally protected endangered species, the Sierra Nevada Yellow-legged Frog, and the Fish and Wildlife Habitat has called for such areas to be protected as Critical Habitat. This proposed mid station associated with Alternative #2 is entirely unacceptable and cannot be built in that location. I think the four Gasex that are closest to the lake should also not be allowed for the same reasons.
- 0117-3 | I would like to see increased attention paid to the following concerns about the potential impacts of this project on Biological Resources. Part of the area proposed for the gondola has been deemed Critical Habitat by the U.S. Fish and Wildlife Service for the federally protected Sierra Nevada Yellow-Legged Frog. I believe that it needs to be stated even more explicitly that these proposed gondola developments, especially Alternative #2, have the potential to destroy the SNYLF population just as it is starting to make a comeback. I have the same concerns regarding the Gasex system that will be placed on USFS land, especially the four that would be located right next to Barstool Lake.
- 0117-3 | I thoroughly read the document "Biological Assessment for the Sierra Nevada Yellow-Legged Frog," which was prepared for the Forest Service by one of Ascent Environmental's Biologists, Carlos Alvarado. I agree with many of his conclusions, including that KSL's preferred gondola route, Alternative #2, is the most harmful to the frog and its critical habitat. However, I do not agree with his final assessment that Alternative #2 could still be an option with the implementation of his prescribed mitigation efforts. His mitigation efforts fall way too short in efforts to protect and preserve this endangered species when one acknowledges that any gondola construction and mid station around "Barstool Lake" will irreparably and negatively impact the frog's primary known habitat and breeding ground. Four of the proposed Gasex structures are also way too close to this lake for the same

0117-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0117-2, Wildlife and Aquatics (W&A)

The comment reiterates information provided in Draft EIS/EIR Section 4.14, "Wildlife and Aquatics" related to impacts to SNYLF under Alternative 2. This information is used to support an opinion against the implementation of Alternative 2. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0117-3, Wildlife and Aquatics (W&A)

Impacts to SNYLF frog and its habitat are analyzed for all alternatives under Impact 4.14-1: Direct and Indirect Effects on Sierra Nevada Yellow-Legged Frog. Similarly, impacts to the SNYLF critical habitat are analyzed for all alternatives under Impact 4.14-2: Direct and Indirect Effects on Sierra Nevada Yellow-Legged Frog Critical Habitat. The comment requests that impacts to SNYLF be expressed "even more explicitly" but does not identify how the impact discussions may currently be inadequate in satisfying the analysis requirements of NEPA or CEQA. No edits to the impact discussions are made in response to this comment.

0117

The comment does not provide specific reasons specifying why the mitigation measures included in the Biological Assessment (BA) (and therefore also included in the Draft EIS/EIR) for Alternative 2 would be inadequate at protecting and preserving SNYLF. Therefore, a response cannot be provided.

This comment also refers to the Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0117-3 cont'd, Wildlife and Aquatics (W&A)

0117

0117-3
cont'd

reasons. Those Gasex explosions are so much louder and cause a stronger, more house-shaking vibration than the avalanche bombs we are accustomed to here in Alpine Meadows. I believe that any frogs trying to overwinter in Barstool Lake will be traumatized by the increased decibels and the stronger vibrations created by the Gasex system (much like the people of Alpine Meadows were this past winter). I really don't see any way that the Forest Service can allow this scale of construction to occur so close to the land and the lake that they have been charged with protecting for the SNYLF. I urge the Forest Service to act as the stewards and protectors of this fragile and irreplaceable public treasure and protect the Granite Chief Wilderness from the permanent affects of this proposed irreversible gondola development project.

0117-4

I also believe that the Forest Service should be the administrators of Congressional intent of the designated boundaries of the Granite Chief Wilderness by preserving and protecting this area from the proposed gondola development project. While private property rights are such that there is no mandate to observe the Congressional intent behind its designation of a portion of the land that is being discussed for the gondola, the Forest Service has the authority to decide not to place part of a gondola or one of its 2 mid-stations on the corner of the boundary of USFS land with the GCW.

0117-5

I also have some very serious concerns about the potential permanent damage that will be caused to the scenic vistas and pristine quality of the Granite Chief Wilderness. I would like to see the negative impacts of the altered views on the experience of hikers of the PCT be more explicitly addressed in the EIS.

0117-6

In general, I have a number of concerns about how this development project will impact the flora and fauna that live in Alpine Meadows, especially on the forest service lands and in the congressionally-designated Granite Chief Wilderness. Alpine Meadows is a special place where a variety of living things thrive because of the relative lack of development. I would like the EIS to state even more explicitly just how sensitive the valley's ecosystem is and how many animals and plants depend on the undeveloped and underdeveloped spaces for their survival. As development continues in both Squaw Valley and Alpine Meadows, wildlife is pushed further and further into the undeveloped areas and more specifically, the forest service lands and in the congressionally-designated Granite Chief Wilderness that are a part of this development proposal. In addition to the other species named in the report that will be impacted by disturbances to the study area, I am especially concerned about potential impacts on the Sierra Nevada Yellow-legged frog that is protected under the Federal Endangered Species Act. The Forest Service has an obligation to afford high levels of protection to this species and this pond as part of its critical habitat. I fear that the importance of this habitat and of protecting it has been grossly undervalued and that it needs to be preserved in an unaltered form. I also have concerns about how the frog may be negatively impacted by disturbances to, among other things, the top soil and groundwater as well as the loss of forest as some of these areas are converted to non-forest space for the gondola structures. I would ask that even more thorough consideration of the potential negative impacts to the Frog be conducted, especially in light of the federal protection the species is being given and the designation of this habitat as being critical to its survival. I do not believe that Alternative #2 is viable at all when examined in relation to the negative impacts it would have on the frog's critical habitat.

0117-7

I also question the overall need for this project and argue that since the study has found that the gondola will actually INCREASE the overall number of cars visiting the resorts, instead of being the more environmentally friendly transportation alternative that that the gondola has been billed as, is the gondola really a necessary or good option for Squaw Valley and Alpine Meadows at this time?

I appreciate the attention to these and other comments during the preparation of the final Environmental Impact Statement for the Squaw Valley/Alpine Meadows Base-to-Base Gondola.

Regards,
Christine Mixon York

Primary Address:
1531 Deer Park Drive
Alpine Meadows, CA 96146

Mailing Address:
Post Office Box 3391
Olympic Valley, CA 96146

0117-3 cont'd, Wildlife and Aquatics (W&A)

0117-4, Wilderness (W2)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0117-5, Visual Resources (VR)

Potential impacts to the Granite Chief Wilderness, including visual impacts, are discussed in Section 4.3.3 "Wilderness" of the Final EIS/EIR. Potential impacts to the recreation experience in the project area, including impacts to the Pacific Crest Trail, are discussed in Section 4.1.3 of the EIS/EIR.

0117-6, Wildlife and Aquatics (W&A)

The comment expresses concern as to how the project will impact the flora and fauna that live in Alpine Meadows, especially on the Forest Service lands and in the congressionally designated Granite Chief Wilderness. The comment would like the EIS to state even more explicitly just how sensitive the valley's ecosystem is and how many animals depend on the undeveloped and underdeveloped spaces for their survival. The comment also expresses concern about potential impacts on the Sierra Nevada yellow-legged frog and its habitat.

Section 4.12, "Vegetation," in the Draft EIS/EIR analyzes potential impacts to vegetation and terrestrial habitats in the project site. Section 4.13, "Botany," analyzes potential impacts to special-status botanical resources, sensitive plant communities, and invasive plant species. Section 4.14, "Wildlife and Aquatics," analyzes potential impacts to terrestrial and aquatic wildlife. Impacts 4.14-1 and 4.14-2 analyze potential impacts to the Sierra Nevada yellow-legged frog and its critical habitat.

The comment requests that some information related to these EIS/EIR sections be expressed "more explicitly" or more thoroughly, but does not identify how the information currently

0117

provided in the EIS/EIR may be inadequate in satisfying the analysis requirements of NEPA or CEQA. No edits to the EIS/EIR are made in response to this comment.

In Sections 4.8, "Utilities" and 4.17, "Hydrology and Water Quality," the topics of water supply and groundwater are addressed. These sections provide evidence supporting the conclusion that the Gondola project would not have adverse effects on groundwater. Therefore, there is not a mechanism for groundwater impacts to adversely affect SNYLF. Effects on SNYLF related to habitat changes, including soil disturbance and tree removal, are addressed in the discussions of Impacts 4.14-1 and 4.14-2.

While the gondola would cross through a portion of the congressionally mapped Granite Chief Wilderness (GCW) under Alternative 2, it would cross only through private lands located within the congressionally mapped GCW (in particular, through a 54.6-acre portion of the privately owned Caldwell property). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, these land use restriction do not apply on private lands. Please refer to Section 4.3, "Wilderness," of the Draft EIS/EIR for further information.

0117-7, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation." The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0118

Will Hollo

From: jacques.mounier@laposte.net
Sent: Saturday, May 26, 2018 3:51 PM
To: Scoping Comments
Subject: The Squaw Alpine Gondola

Provenance : [Courrier](#) pour Windows 10

0118-1 | As owners of an apartment at Olympic Valley, and as lovers of the nature there, we are convinced that this project, as thought after and devised, makes full sense

Best regards

The Mounier and family
400 Squaw Peak Rd Apt#1



Garanti sans virus. www.avast.com

0118-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

From: pmurray@blueboxer.com
Sent: Monday, May 28, 2018 7:13 PM
To: Scoping Comments
Subject: Gondola Project

0119-1

Scott and look at the Caldwell's existing South KT poles near the 5 Lakes switchback. The EIS for alternative 4 is almost in the same location, why not have the gondola path replace Caldwell's path? This would eliminate a second set of cables that cross the 5 Lakes trail & the furthest from the wilderness.

The EIS states that Caldwell's customers could access the Alpine mid-station & top of KT22. This is redundant with Caldwell's South KT chairlift.

The EIS discusses the visual impact and unconfined recreational impact. The elimination of the Caldwell's chairlift has 2 benefits.

1- has only one set of cables crossing 5 Lakes Trail and reduces visual impact from the Alpine of 2 ski transports.

2- Alt 4 will remove the gondolas during the non-ski season when most people have access to the 5 Lakes Trail & the wilderness area.

The fact that the two plans aren't considered at the same time appears to be a procedural issue.

This may be best for the Alpine Homeowners and visitors since Caldwell's plan seems to already be in motion.

Jill Murray
 2387 John Scott Trail
 Olympic Valley, CA 96146

0119-1, Other (O2)

The comment is correct in evaluation of the proximity of the gondola alignment for Alternative 4 being similar to the "KT South" chairlift on the Caldwell Property and the potential for Alpine mid-station loading capabilities to be redundant with the future need for the Caldwell KT South chairlift project. Whether Mr. Caldwell would complete or abandon his approved and constructed lift project in the future is speculative and is beyond the scope of this analysis.

0120**Shirlee Herrington**

From: peter@blueboxer.com
Sent: Monday, May 28, 2018 6:05 PM
To: Placer County Environmental Coordination Services
Subject: Gondola Project comment

0120-1

Scott and look at the Caldwell's existing South KT poles near the 5 Lakes switchback. The EIS for alternative 4 is almost in the same location, why not have the gondola path replace Caldwell's path? This would eliminate a second set of cables that cross the 5 Lakes trail & the furthest from the wilderness.

The EIS states that Caldwell's customers could access the Alpine mid-station & top of KT22. This is redundant with Caldwell's South KT chairlift.

The EIS discusses the visual impact and unconfined recreational impact. The elimination of the Caldwell's chairlift has 2 benefits.

1- has only one set of cables crossing 5 Lakes Trail and reduces visual impact from the Alpine of 2 ski transports.

2- Alt 4 will remove the gondolas during the non-ski season when most people have access to the 5 Lakes Trail & the wilderness area.

The fact that the two plans aren't considered at the same time appears to be a procedural issue.

This may be best for the Alpine Homeowners and visitors since Caldwell's plan seems to already be in motion.

Peter Murray
 2387 John Scott Trl
 Alpine Meadows, CA 96146

0120-1, Project Description (PD)

The commenter is correct in evaluation of the proximity of the gondola alignment for Alternative 4 being similar to the incomplete "KT South" chairlift project on the Caldwell Property and the potential for Alpine mid-station loading capabilities to be redundant with the future need for the Caldwell KT Sout chairlift project. Whether Mr. Caldwell would, or would not, complete his previously initiated lift project in the future is speculative and is beyond the scope of this analysis.

Shirlee Herrington

From: Michael Nashner <nashner@mac.com>
Sent: Monday, June 11, 2018 12:17 PM
To: Placer County Environmental Coordination Services
Subject: Comment on the Squaw Valley to Alpine Meadows Base to Base Gondola #48417

To Whom it May Concern,

0121-1

When finalizing the EIR I would respectfully request that the involved parties consider whether the benefits of connecting Squaw and Alpine with a Gondola outweigh the costs. After reviewing the Draft EIR, it is clear to me that the benefits are not sufficient to justify the significant and documented risks to the local wilderness area, the increased traffic, and the added noise from an array of Gazex installations.

The justification of the Gondola is to add incremental convenience for skiers by creating a more direct connection between the resorts. In their words, this development will "enhance the visitor experience at Squaw Valley and Alpine Meadows by providing easy, and potentially faster, inter-resort access to terrain and amenities at both ski areas." Weigh the trivial benefit of skier convenience against the well-documented consequences. The draft impact statement required over 1500 pages of explanations and study to describe and evaluate all the possible known negative impacts. The reason is that this development crosses a designated wilderness area and has the additional intent of inducing further growth. A few of the major consequences are significant and unavoidable effects on the region through increased traffic, degraded environment, and elimination of "opportunities for solitude or primitive unconfined recreation." What is the cost to a region when traffic becomes a constant burden? What is the cost to future generations that won't be able to explore and appreciate a treasured landscape because of the presence of the development? What are the costs to a neighborhood which is constantly barraged with Gazex explosions? What is the cost when every inch of terrain is accessible by a chair?

The presumed convenience of a few skiers in the short-term should not dictate what happens to a wilderness that is treasured by many others for many different reasons and will be for generations. Skier convenience should not come with with cost of more traffic and noise in the surrounding neighborhoods. Gifford Pinchot, the first Chief of the Forest Service summarized the mission of the Forest Service: "to provide the greatest amount of good for the greatest amount of people in the long run." For me, the calculation is simple, the demonstrated costs and risks of this proposal do not meet the standard of providing the most good for the most amount of people.

Thank you!

Mike Nashner

2034 John Scott Trail
 Alpine Meadows, CA 96146

6564 Gillis Dr
 San Jose, CA 95120

408-823-5878

0121-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0122

Will Hollo

From: WALTER NELSON <uas1@prodigy.net>
Sent: Friday, May 18, 2018 7:06 PM
To: Scoping Comments
Subject: Permit the Squaw Valley Gondola Connection

0122-1 | My residence for more than 25years is at Squaw Valle(1810 Washoe Drive). Al these years I have been waiting for the Gondola connection with Alpine Meadows. The bus goes back & forth every half hour wasting everybody's time & polluting the air taking skiers back & forth all day long. I am 83 years old & still hiking & skiing, so I hope the approval process won't take much longer. Walter Nelson

Sent from [Mail](#) for Windows 10



This email has been checked for viruses by AVG antivirus software.
www.avg.com

0122-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

From: Francisco Nogueira <nogueira.francisco@gene.com>
Sent: Friday, May 18, 2018 2:36 PM
To: Scoping Comments
Cc: ana.sousa@principiabio.com
Subject: Support

0123-1

I support the California Express Gondola because it reduces traffic from mountain to mountain, it improves skier experience AND it has no real impact on the environment.

Tahoe home owner and taxpayer.

frank

0123-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0124

Will Hollo

From: Barb Ogden <brogden@yahoo.com>
Sent: Friday, June 8, 2018 1:52 PM
To: Scoping Comments
Subject: Wilderness protection/quality of life

- 0124-1 | Wilderness protection, once legislated, should remain just that. If the designation changes with the pressures brought about by the whims of big, wealthy and powerful developers, who just want to be even more wealthy, it is useless. To give in and grant them their lofty plans to develop precious areas, means wilderness lost forever and quality of life immediately degraded. Making such changes on a piece by piece basis still results on enormous losses over the years. We need to put a halt to such actions NOW, not after the cumulative damage is irreversible.
- We are so blessed with the majesty of our Sierra mountain areas. So much development has already taken place. There will always be those who seek "more", almost always for selfish reasons, and they just need to know that the answer is a firm, committed "no!"
- 0124-2 | Those of us who travel to N. Tahoe area on a regular basis know how dangerous and impacted the traffic is already, especially on weekends and holidays, but ALWAYS a challenge with the number of big trucks that we have to dodge and tolerate. (Most are excellent drivers, and follow rules, but they have their own set of uphill and downhill challenges). In the winter snow, the problems are exacerbated, making a weekend ski trip a challenge to skill and travel time.
- Why on earth would we want to make things worse, just for the gain of a relative few? Besides the development itself, all the added workforce housing and traffic would just compound the problems. Lets "just say no" and let that be our mantra.
- 0124-3 | Developers will ALWAYS want to develop, but often not for the right reasons. They are looking for their own profits and the recreation of a privileged few. Please don't give in.
- Barbara and Paul Ogden
 Auburn, CA.

0124-1, Wilderness (W2)

Impacts related to the GCW and other wilderness areas are addressed in Section 4.3, "Wilderness," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is warranted.

0124-2, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Impacts related to traffic are addressed in Section 4.7, "Transportation and Circulation," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the DEIR are raised in this comment. No further response is warranted.

0124-3, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Graham Owen <graham.owen@gmail.com>
Sent: Friday, May 18, 2018 1:48 PM
To: Placer County Environmental Coordination Services
Subject: In support of the Squaw Valley/Alpine Meadows California Express Gondola

Dear USFS/Placer County:

0125-1 | I support the California Express Gondola because it will allow easy access between the two mountains and reduce traffic and congestion in the area.

I have been skiing, snowboarding, and hiking both areas my whole life (I am 37 years old now), and always have thought connecting the two with a lift or gondola would be great. In recent years, traffic congestion on the roads has made it apparent that what I use to wish for as a matter of convenience has become a necessity. Highway 89 has become a parking lot with increasing frequency. Anything that can be done to reduce traffic, including keeping people off the roads by using a gondola, should be done. Particularly a privately funded project.

Thank you for your public service, and please support the California Express Gondola.

Sincerely,
Graham Owen

0125-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0126**Shirlee Herrington**

From: cepsc@juno.com
Sent: Saturday, May 12, 2018 11:57 AM
To: Placer County Environmental Coordination Services
Subject: Gondola Exprewss5

0126-1 | Get it done to help get some cars off the road! Air breather, Squaw visitor, carolyn P.

0126-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Dennis Padla <drdenpadla@aol.com>
Sent: Friday, May 18, 2018 11:55 AM
To: Placer County Environmental Coordination Services
Subject: Squaw Gondola

"Dear USFS/Placer County:

0128-1 | I support the California Express Gondola because it will enable the appropriate utilization of this resource with minimal environmental impact.

Thank you,
Dr Padla

Dennis Padla, MD
drdenpadla@aol.com

0128-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0129

Shirlee Herrington

From: Greg Parrott <ghparrott@gmail.com>
Sent: Monday, June 11, 2018 3:54 PM
To: Placer County Environmental Coordination Services
Subject: Comment - Problems associated with alternative #2 of Squaw-Alpine Base to Base Gondola.

0129-1 | In both the open house held on 5/22 and the meeting held on 5/24, a request was made to supplement verbal comments with emails which reiterate and/or expand on citizen views. This email reiterates a view I expressed at both events. In summary, my opinion is that if a base to base gondola proposal is approved, alternative #4 should be the chosen path. Here is my rationale:

I have visited what was (recently and arbitrarily) labeled as 'Barstool Lake' since the mid 1960's (50+ years). Prior names included 'Frog' and 'Priscilla' lake, with the latter name being attributed to the daughter of one of the first homeowners in Alpine Meadows (~1962). Labeling it 'Barstool' appears to be an effort to diminish its majesty. Barstool is perched at the edge of cliffs, enabling superb views to the east, including sunrise. In addition to the lake itself, a small marsh that lies adjacent to it provides an upper alpine habitat/shelter for frogs.

0129-2 | **The damage alternative #2 would inflict includes:**

-) With towers and cables running horizontally for an EXTENDED length along the ridge line, it Imposes a severe visual blight to both residents as well as anyone driving into the valley. It's obvious that following an upper elevation contour line is FAR more deleterious than having towers/cables following a fall line (as most ski towers tend to do)

-) With respect to Barstool lake, the visual blight of the towers, along with HUUUGE turn station and the Gazex fuel storage facility literally adjacent to Barstool lake would essentially destroy it.

-) As best as I can estimate, towers would also be visible from the most eastern of the Five Lakes, diminishing the appeal of this lake as well.

0129-3 | -) The the EIS report indicates this development would further compromise an endangered from (I've heard frogs there myself, although I am not savvy enough to know what species they were)

The precedent which approval of alternative #2 would set:

0129-3 | In addition to the detractions mentioned above, approving alternative #2 would set a precedent which WILL
 cont'd | serve future development aspirations. Once ANY towers and a turn station are installed at Barstool lake, it then makes it much more difficult on environmental grounds to reject Mr. Caldwell's proposition for 'White Wolf'. This entails adding a second set of towers and even a skier off-load at Barstool lake. While alternative #2 would bound Barstool lake IMMEDIATELY to the east, White Wolf would bound Barstool lake IMMEDIATELY to the north (right through the marshy area well suited for frogs). This adds insult to injury. Furthermore, if skiers are offloaded at Barstool lake then for safety reasons, the lake would have to be cordoned off in order to reduce the risk of skiers breaking through the ice/snow. Inevitably, this means grooming equipment, lost equipment (gloves, etc.), trash and the like will be deposited in the area

0129-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0129-2, Visual Resources (VR)

Visual impacts that would result from the project are analyzed in Section 4.2, "Visual Resources." The comment does not provide specific reasons specifying why the Draft EIS/EIR is inadequate. Therefore, a response cannot be provided.

0129-3, Wildlife and Aquatics (W&A)

Potential impacts to Sierra Nevada yellow-legged frog are addressed in Section 4.14, "Wildlife and Aquatics," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0129-3 cont'd, Cumulative Effects (CE)

Cumulative effects of the project in connection with other probable future projects (including the White Wolf development) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR. The probable future projects listed in Table 3-3 are in various states of approval/implementation. As described on page 3-10 of the Draft EIS/EIR, and in accordance with NEPA and CEQA, these projects:

are partially occupied or under construction, have received final discretionary approvals, have applications accepted as complete by Federal, state or local agencies and are currently undergoing environmental review, or are proposed projects that have been discussed publicly by an applicant or that otherwise become known to a local agency and have provided sufficient information about the project to allow at least a general analysis of environmental impacts.

Table 3-3 lists each project's approval/implementation status in a separate column. These projects are subject to consideration

0129

and review by the applicable lead agency. Depending on the circumstances of each application and the lead agency's ability to make the necessary findings in each case, projects may be approved or denied. Approval of the proposed gondola project would not indicate that other projects in the area would also be approved and implemented.

The Draft EIS/EIR identifies on page 2-14 that "grooming around the mid-stations would occur on an as-needed basis (typically after snow and wind events) by snow shoveling and snow cat grooming." No snow grooming near Barstool Lake is proposed. If skiers leaving the Alpine Meadows mid-station under Alternative 2 must be directed away from Barstool Lake, this would be done at the mid-station itself and not at the lake.

0129

0129-3 | Approval of alternative #2 would pave the way for White Wolf. Either BOTH alternative #2 AND White
cont'd | Wolf's lift towers to/through Barstool lake should be denied or BOTH will ultimately be approved.

Implications of proposed Gazex installations near Barstool lake:

0129-4 | The proposed Gazex exploders near Barstool lake currently seem to be just a side note to the 'Base to Base gondola' project. However, their proposed location warrants that they have their own EIS study. If this is done, their service requirements will lead to rejection of this proposed location of exploders and their fuel station. Four Gazex exploders are proposed near Barstool lake. Their fuel storage facility is portrayed on the map as being extremely close to Barstool lake. The question then is 'how is fuel going to be delivered to the storage facility?' Other than a very unlikely proposition to use helicopters, the only other answer is that snowcats would deliver fuel. The land located within the western bounds of private property is FAR TOO ROCKY for snow cats or even snow mobiles. Consequently, the only viable path for the snowcats is THROUGH WILDERNESS.

On January 20, 2013, shortly after Squaw and Alpine first merged, I snowshoed to Barstool lake (photos attached). To my surprise, I found a wide, groomed (corduroy) path leading right up to Barstool lake's northeast edge. From there, skiers had to navigate a steep edge with essentially no snow cover. Once they passed this edge, the Alpine Meadows lodge became visible and skiers then had more choice on picking a path down. The photos I have attached document that this groomed path was WELL INSIDE WILDERNESS BOUNDARIES. The implication of having snowcats traveling in Winter (and probably in Fall as well) through WILDERNESS to service the Gazex machines and supply them with fuel would trample vegetation in the wilderness area. Consequently, the proposed location for the Gazex fuel station should be denied.

Barstool lake - From rock shelf, looking east (sunrises are visible from here)

0129-3 cont'd, Cumulative Effects (CE)

0129-4, Wilderness (W2)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

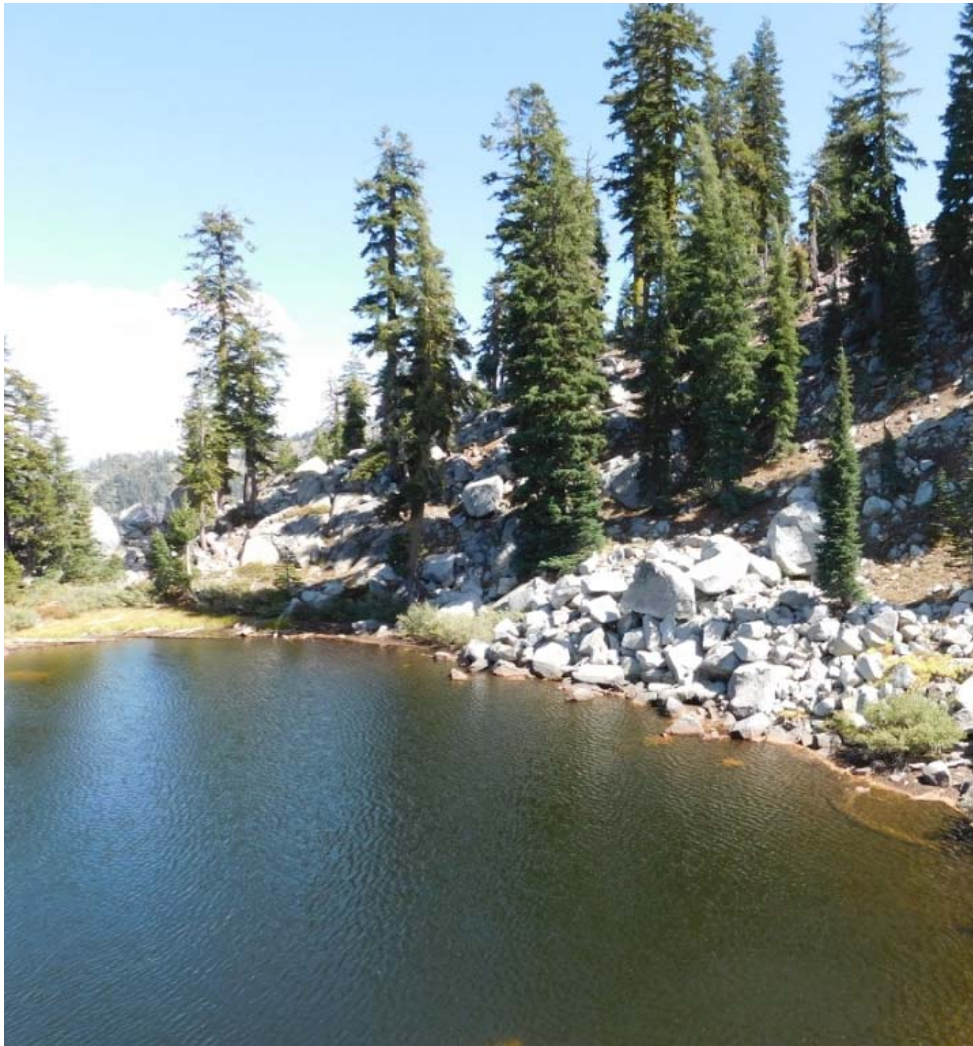


Barstool lake - From rock shelf, looking north. Marshy area is visible

0129



Barstool lake - From rock shelf looking south east



Barstool lake - From rock shelf looking north east

0129



Barstool lake - from south side looking north, with rock shelf visible at left



Barstool lake - photo taken from southeast corner looking north (compare this photo to Winter photograph taken from similar location)

0129



Barstool lake as seen from south eastern corner, looking northwest 1/20/2013. Rock shelf is visible at end of lake

0129

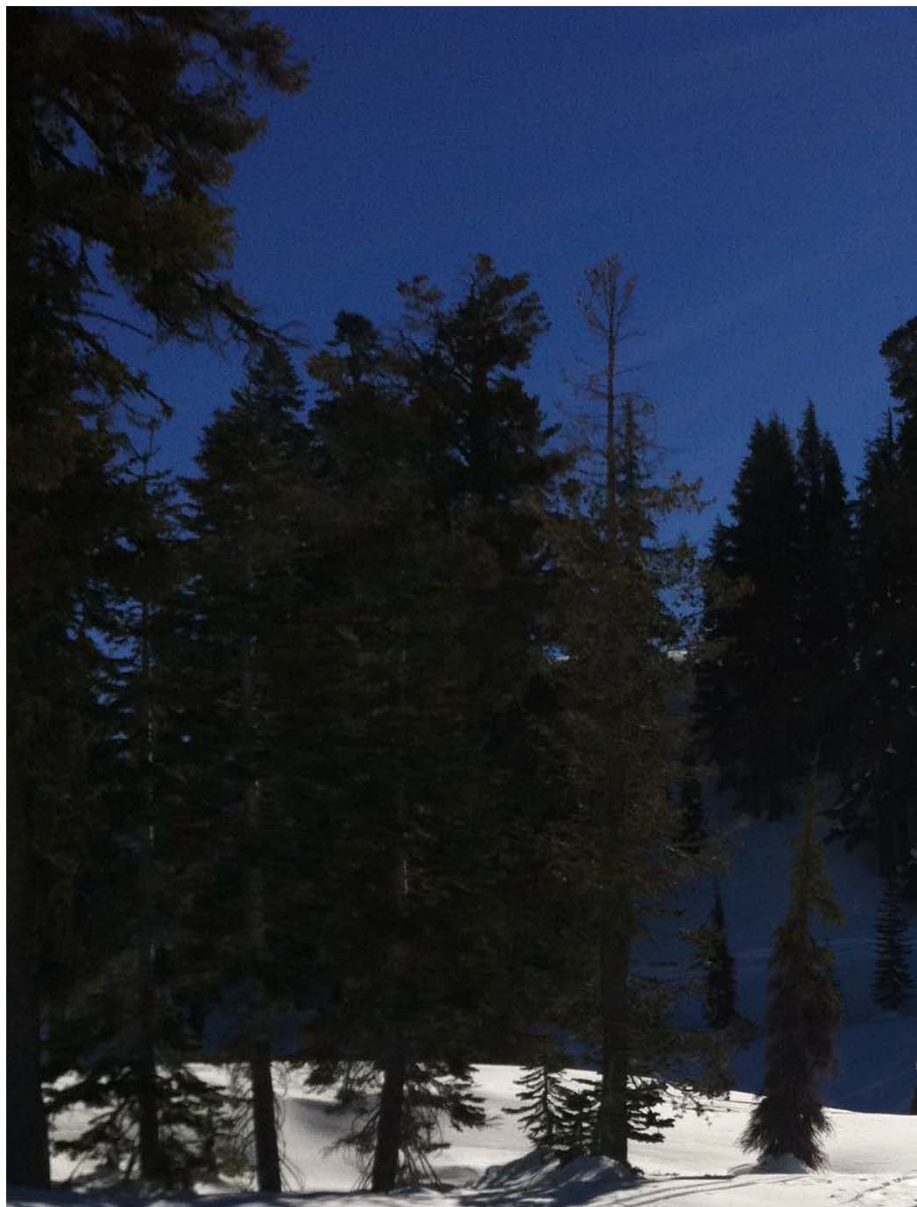


9

0129

Barstool lake from north side looking mostly south. Groomed trail headed west into wilderness and Rock shelf at Barstool lake is visible in the shadows

0129



11

0129

Signpost planted near northeast corner of Barstool lake

0129



13

0129

Proximity of signpost and groomed (corduroy) pathway relative to rock shelf at Barstool lake (groomed path split at this junction)

0129



15

0130

Date submitted (Pacific Standard Time): 6/5/2018 10:43:27 AM

First name: Scott

Last name: Patrick

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1690 Pinecone Circle

Address2: 1690 Pinecone Circle

City: Incline Village

State:

Province/Region: NV

Zip/Postal Code: 89451

Country: United States

Email: scott@baypack.com

Phone: 9253234949

Comments:

0130-1 | I think the base to base gondola is a great idea that will help the area much more then hurt it. Please approve it so we can start using it asap....

Thanks.

0130-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

From: Robert Pavese <lubeall@aol.com>
Sent: Saturday, May 19, 2018 11:14 AM
To: Scoping Comments
Subject: Squaw / Alpine Lift

0131-1

I think a lift like this would be a great environmental victory for the area . This connection would eliminate traffic between the resorts, shuttles and buses. They would be replaced with an electric transportation system that emits no polluting gases and would be totally carbon neutral since these resorts are going to totally solar power

Thanks

Bob

Lake Tahoe

0131-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0132

Will Hollo

From: Lara Pearson <lara@brandgeek.net>
Sent: Monday, June 11, 2018 2:53 PM
To: Scoping Comments
Subject: Opposition to Squaw Gondola project

Dear Representatives of the U.S. Forest Service, Tahoe National Forest, Truckee Ranger District:

0132-1

I am writing to express my opposition to the unnecessary and environmentally damaging proposed Squaw-Alpine gondola. Even KSL's "best" alternative has 33 unavoidable environmental impacts. This project is incapable of being completed in an environmentally conscious manner and therefore must be denied.

Thank you for your time and consideration.

Warmly,

Lara Pearson
 Law Office of Lara Pearson Ltd, PBC
 Chief Pontificator, Brand Geek

[Click here to schedule an appointment with me](#)

Lara@BrandGeek.net | Ph: 775.833.1600 | [My bio](#)

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Save trees. Don't print!

0132-1, Opinion (O1)

The comment notes that the environmentally superior alternative (Alternative 4) would have 33 adverse environmental impacts. Table 2-3 in the Draft EIS/EIR summarizes the impacts of all the alternatives, and the comment is correct in that Alternative 4 would result in 33 NEPA conclusions of adverse effect, as shown in this table. However, many of the CEQA conclusions for the same impacts are less than significant with mitigation, meaning that these impacts can be reduced below thresholds of significance with implementation of mitigation measures identified in the Draft EIS/EIR. In fact, the only significant and unavoidable impacts associated with the project include impacts to visual resources (Impact 4.2-2), impacts on vehicular queuing at Caltrans intersections (Impact 4.7-4), cumulative traffic impacts (Impacts 4.7-11 through 4.7-13) and construction noise impacts (Impact 4.9-1); these are summarized in Section 5.2.1, "Significant Environmental Effects that cannot be Avoided," of the Draft EIS/EIR.

Shirlee Herrington

From: Michelle Peltier <michelle.peltier@wnc.edu>
Sent: Friday, June 08, 2018 8:36 AM
To: Placer County Environmental Coordination Services
Subject: Stop the Gondola

0133-1

Stop the Granite Chief. Squaw-Alpine Gondola. The USFS and Placer County Alternative routes for the Squaw-Alpine Gondola on top of the visitation and use map produced by the researchers at Presidio Graduate School shows clearly every alternative will cause unavoidable harm to the Five lakes and Granite Chief Wilderness visitor experience.

It's time to stop a bad idea. We already knew this would have a negative impact on our wilderness area, but now we have documented quantifiable proof.

Sincerely yours Michelle

Michelle Legras Peltier
GRAPHIC DESIGNER
775-445-3238

0133-1, Opinion (O1)

The comment references a "visitation and use map produced by the researchers at Presidio Graduate School" but provides no information on where this map may be found or if/where it has been published. An internet search was conducted using combinations of various terms such as "Presidio Post Graduate School," "Squaw Valley," "Alpine Meadows," "visitation map," "use map," and others, but no map fitting the information provided in the comment was found. Therefore, a response related to the referenced map is not warranted.

Beyond the reference to the map, the comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0134**Shirlee Herrington**

From: 19evan90 <19evan90@gmail.com>
Sent: Sunday, May 20, 2018 4:49 AM
To: Placer County Environmental Coordination Services
Subject: California Express Gondola

Dear Placer County:

0134-1 | I support the California Express Gondola because it would reduce traffic and fuel consumption among those of us who ski both mountains in the same day.

-Evan Peters

0134-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0136

Date submitted (Pacific Standard Time): 6/11/2018 1:23:39 PM

First name: Eric

Last name: Pilcher

Organization:

Title:

Official Representative/Member Indicator:

Address1: 4106 Robert Ave.

Address2:

City: Carmelian Bay

State: CA

Province/Region:

Zip/Postal Code: 96145

Country: United States

Email: Pilcher@moesoriginalbbq.com

Phone: 3344125576

Comments:

There is already enough traffic from hikers, skaters, skiers /enthusiasts in this area to cause environmental damage. More animals will retreat, the area will be less desirable and so on. It's a no brainer really. We already boast more lifted ski areas than most regions. Squaw and alpine are plenty big as it is. Please have the respect to preserve what's left. In the future, the allowance of this project will result in a negative impact on our area. Thanks for allowing comments

0136-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0137**Shirlee Herrington**

From: Karen Pitbladdo <cyclensail56@yahoo.com>
Sent: Thursday, May 10, 2018 9:56 PM
To: Placer County Environmental Coordination Services
Subject: Alpine-Squaw gondola

0137-1

While I generally oppose the project, it certainly seems that the 4th site- located near red dog makes the most sense.
Better access from the parking lots and not disturbing the pond.
Off season the area around the pond should remain!
Karen Pitbladdo

Sent from my iPad

0137-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0140

0140-1 | Date submitted (Pacific Standard Time): 5/22/2018 7:14:56 PM
First name: Carol
Last name: Pollock
Organization:
Title:
Official Representative/Member Indicator:
Address1: P O 6745
Address2:
City: Tahoe City
State:
Province/Region: Ca
Zip/Postal Code: 96145
Country: United States
Email: Carol_pollock@sbcglobal.net
Phone: 510 599 7922
Comments:
Please do not permit the
Base to base gondola. It will ruin a wilderness area forever.

0140-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0141**Will Hollo**

From: Carol Pollock <carol_pollock@sbcglobal.net>
Sent: Tuesday, May 22, 2018 8:14 PM
To: Scoping Comments
Subject: Gondola at Squawslpine

0141-1

I have hiked and skied at Alpine Meadows for over fifty years. And we have owned a Tahoe home for more than twenty years. There are so many reasons that the proposed gondola is a bad idea. Here are a few of them:

- Pollution of wilderness area.
- Construction in a wilderness area.
- Visual corruption of a wilderness area.

I hope you will reject the gondola.

Sincerely
Carol Pollock
405 Old Mill Road
Tahoe City, Ca 96145

Sent from my iPhone

0141-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Eric Poulsen <epsquaw@yahoo.com>
Sent: Monday, June 11, 2018 11:08 AM
To: comments@squawalpinegondola-eis.com
Cc: Placer County Environmental Coordination Services
Subject: Squaw - Alpine Proposed gondola comments

- 0142-1 Thank you for letting me make comment on this proposed project.
- 0142-2 -In regard to possible alternatives for alignments listed, I think that alternatives 3 and 4 are the best. Alternatives 3 and 4 will provide less visual impact as well as provide better operational conditions due to lower wind impacts.
- on the discussion about traffic and circulation issues there is one important circumstance that I did not see discussed. There are many season pass holders who live in either Squaw Valley and Alpine Meadows. Many of the Alpine Meadows season pass holders ski almost exclusively at Squaw Valley and visa versa. Currently, many, or, most of these season pass holders drive from their home in one Valley to the other Valley to ski and then drive back to their home in the opposite valley. Traffic counts with this involves potentially four trips 1. Trip out of the home valley, 2. Trip into the valley where they are going skiing, And then 3. A trip back out ski Valley, and then 4. Another trip back to their home In their home Valley.
- My thought is that these skiers very Likely would keep their vehicles in their home Valley and use this New gondola to access the other Valley of the overall ski area.
- For that skier it would reduce the traffic impact need to Highway 89 and the in and out of the valleys by multiple trips as explained above.
- I think that this possibility should also be analyzed. I think that you will find that overall traffic will actually be reduced because of this.
- Thank you for allowing me to make these comments.
Eric Poulsen
P.O. Box 2491
Olympic Valley, Ca. 96146
- Resident of Squaw Valley who skis and accesses both Valleys to do this as listed above.
- Sent from my iPhone

0142-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0142-2, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment states that the gondola could result in fewer trips made by residents/guests staying in the Squaw Valley or Alpine Meadows areas and desiring to visit the other resort. The comment suggests that in lieu of traveling from one area to the other, these residents/visitors may instead choose to ride the gondola, which could reduce traffic on State Route 89. Page 4.7-25 mentions that the analysis is conservative in that it does not assume any of the new skier visits are made by persons already staying in Olympic Valley. This commentor is correct in that local residents could make these types of travel choices, which if considered in the study, would have resulted in fewer vehicle trips generated by the project.

0145

Shirlee Herrington

From: Quinn, Pamela <Pamela.Quinn@sephora.com>
Sent: Monday, June 11, 2018 5:01 PM
To: Placer County Environmental Coordination Services
Subject: FW: Squaw Valley Alpine Meadows Gondola Project- Comments on Draft EIS/EIS

From: Quinn, Pamela
Sent: Monday, June 11, 2018 4:58 PM
To: CDRAEC@placer.ca.gov
Subject: Squaw Valley Alpine Meadows Gondola Project- Comments on Draft EIS/EIS

Dear Environmental Coordination Services

0145-1 I am a grateful and privileged homeowner in Alpine Meadows for +20 years and looking forward to soon retiring so I can reside full time in this beautiful valley. Until this weekend that is when I saw the recently installed Avalanche equipment on the mountainside. I am formally submitting this memo of concern over the visual impact of the recently install Gazex avalanche blast platforms and equipment.

The equipment in its current state severely impacts the natural mountain appeal and appears at first glance appears as if aliens have just landed on the back side of KT22. I apologize if the scope of work includes some type of integration into the natural environment which might not yet be completed but as of this weekend the equipment is a disastrous eyesore!! We have attended many of the homeowner association meetings and reviewed the visuals for the proposed gondola to which we have been a supporter of but no renderings or visuals were ever presented to the valley of these blast platforms to my knowledge. I have read that these will likely create a high level of Noise Pollution as well as the current Visual Pollution presented.

At a minimum the EIR must require this equipment be camouflaged to blend into the natural surroundings for ALL seasons. They are bright white finish now which is likely fine for the snow months but as for the summer and fall this is a disgrace to our beautiful community. Also Noise ordinances and controls should be instated if not done already.

Thank you for allowing the public to make comment,

Sincerely,

Pam & John Houseman

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0145-1, Visual Resources (VR)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0146

Date submitted (Pacific Standard Time): 6/11/2018 4:28:28 PM
First name: Russell
Last name: Reams
Organization:
Title:
Official Representative/Member Indicator:
Address1: P.O. Box 2324
Address2:
City: Olympic Valley
State: CA
Province/Region:
Zip/Postal Code: 96146
Country: United States
Email: Reamsteam@gmail.com
Phone: 419-324-4602
Comments:
Hello,

0146-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

In this day and age we need to recognize that unless it is totally, completely, and unavoidably necessary development then we must preserve and protect it.

Collectively we have overstepped our environmental footprint and we must see that our wilderness areas does not get tread upon.

This is one of the last wild refuges in the most populated state in the country - to tip the balance in a way that is irreversible gives away our rights as citizens of California to be able to enjoy the land in its natural state.

I hope that the valleys become connected in a way that leaves no trace - until then let us not make decisions that will forever impact a very sensitive area.

Thank you

Rusty Reams

0147**Will Hollo**

From: The Great Bingo Revival <thegreatbingorevival@gmail.com>
Sent: Monday, June 11, 2018 5:26 PM
To: Scoping Comments
Subject: Squaw Alpine Gondola

Hello,

0147-1

In this day and age we need to recognize that unless it is totally, completely, and unavoidably necessary development then we must preserve and protect it.

Collectively we have overstepped our environmental footprint and we must see that our wilderness areas does not get tread upon.

This is one of the last wild refuges in the most populated state in the country - to tip the balance in a way that is irreversible gives away our rights as citizens of California to be able to enjoy the land in its natural state.

I hope that the valleys become connected in a way that leaves no trace - until then let us not make decisions that will forever impact a very sensitive area.

Thank you

Rusty Reams

0147-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Date submitted (Pacific Standard Time): 6/7/2018 4:10:44 PM
 First name: Susan
 Last name: Reed
 Organization:
 Title:
 Official Representative/Member Indicator:
 Address1: 2067 RENPOINT WAY
 Address2: 7287 Chinkapin Road
 City: ROSEVILLE
 State: CA
 Province/Region: CA
 Zip/Postal Code: 95661-4082
 Country: United States
 Email: sreedbc@surewest.net
 Phone: 9169963680
 Comments:
 To: Forest Service
 Subject: Squaw Alpine Gondola

0148-1 | Hello,
 I am writing to voice my opposition to the Squaw Alpine Gondola and the taking back of previously designated wilderness lands. This gondola would disrupt some of the most beautiful and natural granite, forests, 5 Lakes, native animals in an area that includes part of the Pacific Crest Trail. Proposed 37 towers carrying gondolas and people over this area is unconscionable.
 I own homes in Placer County and Tahoma, El Dorado Co. and have been visiting, enjoying and living in the Tahoe area for 60 years.
 My first hike to 5 Lakes with my family was over 30 years ago when my twin nephews were 8 and they are now 39! We still laugh about the "wet sandwich incident" and the temper tantrums that followed! But beyond that, this hike left us with lasting memories and an experience of nature, pristine lakes and the serenity of the mountains we will never forget.

0148-2 | The increase traffic on hwy 89 is a huge issue for any new development that attracts more cars and people to this delicate and sensitive environment.

0148-3 | Although Squaw states this gondola will only run during winter, I am sure, in a matter of time, they will open it up year round to attract more tourists and increase revenues.

0148-4 | I have skied Alpine and Squaw, this gondola is more a novelty attraction for skiers rather than a functional solution to solve the traffic problems. They currently have shuttles that run between the 2 resorts and they appear minimally utilized by skiers.

0148-5 | Please do not build the gondola! Save and preserve our open public lands and our beautiful Sierras and Tahoe for generations to come.

Sincerely,
 Susan A. Reed

0148-1, Opinion (O1)

Potential impacts to the Granite Chief Wilderness area and Pacific Coast Trail are addressed in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness," of the Draft EIS/EIR. Impacts to wildlife are addressed in Section 4.14, "Wildlife and Aquatics," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0148-2, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Traffic impacts are addressed in the Draft EIS/EIR in Section 4.7, "Transportation and Circulation." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0148-3, Project Description (PD)

Proposed operation and long-term maintenance of the gondola is described on pages 2-13 and 2-14 of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0148-4, Alternatives (A)

An alternative to improve and expand the existing shuttle system between the two ski areas, as described by the commenter, is assessed in Section 2.3.2.1. See the Master Response above on the Improvements to Existing Shuttle System Alternative provided in Section 1.8, "Master Responses."

0148-5, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the

0148

Placer County Planning Commission and Board of Supervisors
before a decision on the project is rendered.

Will Hollo

From: sreedbc@surewest.net
Sent: Thursday, June 7, 2018 6:25 PM
To: Scoping Comments
Subject: Oppose Squaw Alpine Gondola!

To: U.S. Forest Service
 Subject: Squaw Alpine Gondola

Hello,

0149-1 | I am writing to voice my opposition to the Squaw Alpine Gondola and the taking back of previously designated wilderness lands. This gondola would disrupt some of the most beautiful and natural granite, forests, lakes, native animals in an area that even includes part of the Pacific Crest Trail. The proposed 37 towers carrying gondolas and people over this area is unconscionable.

I own homes in Placer and El Dorado County and have been visiting, enjoying and living in the Tahoe area for 60 years.

My first hike to 5 Lakes with my family was over 30 years ago when my twin nephews were 8 and they are now 39! We still laugh about the "wet sandwich incident" and the temper tantrums that followed! But beyond that, this hike left us with lasting memories and an experience of nature, pristine lakes and the serenity of the mountains we will never forget.

0149-2 | The increase to traffic on hwy 89 is a huge issue for any new development that attracts more cars and people to this delicate and sensitive environment.

0149-3 | Although Squaw states this gondola will only run during winter, I am sure, in a matter of time, they will open it up year round to attract more tourists and increase revenues.

0149-4 | I have skied Alpine and Squaw for years, this gondola is more a novelty attraction for skiers rather than a functional solution to solve the traffic problems. They currently have shuttles that run between the 2 resorts and they appear minimally utilized by skiers.

0149-5 | **Please do not build the gondola! Save and preserve our open public lands and our beautiful Sierras and Tahoe for generations to come.**

Sincerely,
Susan A. Reed

2067 Renpoint Way, Roseville CA 95661

7287 Chinkapin Road, tahoma, CA 96142

0149-1, Opinion (O1)

Potential impacts to the Granite Chief Wilderness area and Pacific Coast Trail are addressed in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness," of the Draft EIS/EIR. Impacts to wildlife are addressed in Section 4.14, "Wildlife and Aquatics," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0149-2, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0149-3, Project Description (PD)

Proposed operation and long-term maintenance of the gondola is described on pages 2-13 and 2-14 of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0149-4, Alternatives (A)

An alternative to improve and expand the existing shuttle system between the two ski areas, as described by the commenter, is assessed in Section 2.3.2.1. See the Master Response above on the Improvements to Existing Shuttle System Alternative provided in Section 1.8, "Master Responses."

0149-5, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the

0149

Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0150

Date submitted (Pacific Standard Time): 5/22/2018 3:21:25 PM
First name: Roxanne
Last name: Riddle
Organization:
Title:
Official Representative/Member Indicator:
Address1: 12411 Northwoods Blvd.
Address2:
City: Truckee
State: CA
Province/Region:
Zip/Postal Code: 96161
Country: United States
Email: rbeverstein@gmail.com
Phone: 5305875275
Comments:

I am against building a gondola from Squaw Valley to Alpine Meadows

0150-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0150-1 |

0151

Will Hollo

From: Helga Roghers <hroghers@icloud.com>
Sent: Sunday, June 10, 2018 5:51 PM
To: Scoping Comments
Subject: Meeting June 11th, 2018

0151-1 | I'm a full time resident of Carnelian Bay and have skied Alpine for many years. Unfortunately for the next ski season we will no longer be able to purchase a senior pass. Alpine has always been a wonderful place for locals, families and seniors not only for skiing, but also for hiking. This will no longer be possible since Squaw just doesn't care about the local population or the damage they plan to do to the environment.

Please do not approve these developments and recognize how precious this area is.

Thank you,
Helga Roghers
5655 North Lk. Blvd.
Carnelian Bay, CA 96140-0898

Sent from my iPad

0151-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Shirlee Herrington

From: Driver Rules <tahoeroots1@aol.com>
Sent: Saturday, May 26, 2018 4:02 PM
To: Placer County Environmental Coordination Services
Subject: Squaw gondola

0152-1

I have lived in Tahoe for the last 19 years and I love the Granite Chief wilderness more than I love to ski. I'm a 17 year pass holder at Alpine Meadows and everyone I know is against this atrocious gondola. Please consider denying this development.

Thank you.

Peace

0152-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0153**Will Hollo**

From: Bill Russell <billrussell586@gmail.com>
Sent: Saturday, May 19, 2018 8:46 AM
To: Scoping Comments
Subject: Squaw Alpine Gondola Comments

0153-1 | I support the project as it will enhance the options available to visitors and skiers as well as reuse traffic between the 2 base areas.

Thanks
Bill Russell
billrussell586@gmail.com

0153-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Hsamowitz <hsamowitz@yahoo.com>
Sent: Wednesday, May 23, 2018 5:14 PM
To: Placer County Environmental Coordination Services
Subject: Squaw-Alpine Meadows Gondola project

0155-1

I am in favor of this project. It will dramatically improve the ski experience at Squaw, and eliminate some of the traffic and the buses that have to continually run between the ski resorts. As a result, it will have a neutral impact on the environment, but a significant positive economic impact.

Harvey Samowitz, MD
Sent from my iPhone

0155-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0156

0156-1, Opinion (O1)

These issues are all addressed in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0156-1

Date submitted (Pacific Standard Time): 6/8/2018 11:40:49 AM

First name: Glenna

Last name: Sansone

Organization:

Title:

Official Representative/Member Indicator:

Address1: 5005 Raleigh Way

Address2:

City: Carmichael

State:

Province/Region: CA

Zip/Postal Code: 95608

Country: United States

Email: gsansone52@gmail.com

Phone: 9167059446

Comments:

I own a second home in Tahoe City and I strongly oppose this project. It will FOREVER change the nature of the Alpine Meadows valley and destroy the beauty of the unique 5 Lakes Trail. It will impose numerous adverse environmental impacts to regional transportation, noise, air quality, vegetation, botany, wildlife and aquatics, wetlands, and hydrology and water quality.

Shirlee Herrington

From: catherine schmid maybach <tierrapicante@hotmail.com>
Sent: Friday, June 08, 2018 8:58 PM
To: Placer County Environmental Coordination Services
Subject: No to gondola

0157-1 | To whom it may concern,
I am opposed to a gondola connecting Alpine to Squaw because if it's negative impact on the Granite Chief Wilderness.
Catherine Schmid-Maybach

Sent from my Verizon Wireless 4G LTE smartphone

0157-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0158**Shirlee Herrington**

From: USM <usm@brightlineconsulting.com>
Sent: Friday, June 01, 2018 8:19 AM
To: Placer County Environmental Coordination Services
Subject: Squaw - alpine gondola comment

Hello

0158-1

I'm a long time pass holder at Alpine meadows and my parents were early investors in Alpine Meadows. Its exciting to see that squaw and alpine will be connected by a gondola. However I strongly urge you to stay out of the granite creek / little five lakes wilderness area and choose the alternative with the least environmental impact: Alternative #4.

Thank you

Ulrich Schmid-Maybach

3106 FILLMORE ST
SECOND FLOOR
SAN FRANCISCO, CA 94123
PHONE 415.668.8685
FAX 415.358.5515
USM@BRIGHTLINECONSULTING.COM

0158-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0159

Date submitted (Pacific Standard Time): 6/11/2018 3:22:59 PM

First name: Dana

Last name: Schneider

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1293 Bing Tree Way

Address2:

City: Sebastopol

State:

Province/Region: CA

Zip/Postal Code: 95472

Country: United States

Email: danafschneider@gmail.com

Phone: 707696-0635

Comments:

Hello,

I am concerned that alternative 2 is the most damaging environmentally option. My number one priority would be no Gondola, however if there is one please do not utilize this option.

I am a home owner in the Meeks Bay community.

Thank you for your consideration.

0159-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0160

0160-1, Opinion (O1)

Potential impacts to the Granite Chief Wilderness area and the Five Lakes Trail are addressed in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness," of the Draft EIS/EIR. Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0160-1

Date submitted (Pacific Standard Time): 6/11/2018 9:17:55 AM

First name: David

Last name: Schneider

Organization:

Title:

Official Representative/Member Indicator:

Address1: 482 Sweetwater Drive

Address2: 1293 Bing Tree Way

City: Meeks Bay

State:

Province/Region: California

Zip/Postal Code: 96142

Country: United States

Email: davidmschneider@comcast.net

Phone: 7076956407

Comments:

I oppose the Squaw/Alpine gondola. All of what is currently proposed will impact the Granite Chief Wilderness Area adversely, especailay along the Five Lakes Trail.

It will overload the area with traffic, substantially changing the wilderness experience. I'm aware alternatives 3 and 4 have less of a visual impact than 1 & 2, however they all degrade the simple, scenic beauty of this area.

Thank you for considering my views.

0161

Date submitted (Pacific Standard Time): 5/25/2018 2:07:14 PM
First name: Ron
Last name: Scoglio
Organization:
Title:
Official Representative/Member Indicator:
Address1: 1330 Pine Trail
Address2:
City: Alpine Meadows
State: CA
Province/Region:
Zip/Postal Code: 96146
Country: United States
Email: rintahoe@hotmail.com
Phone: 530-320-7203
Comments:
To the NFS,

0161-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

This is in response to the proposal from SVSH regarding the Squaw Valley to Alpine Meadows Base to Base Gondola #48417.

I have been a full time resident of Alpine Meadows, CA since November of 1989. Alpine is a very special and unique valley. It is a home to many diverse and native flora & fauna. The proposal in all forms will drastically change the look and feel of the Valley, not to mention the impact it will have on the forest, animals and plants. SVSH believes that building this gondola will decrease road congestion, but truly they are only looking to increase their "bottom line" with increased skier traffic.

The NFS must maintain a truly special space "as is" for future generations to enjoy. My opinion is Alternative 1- NO ACTION ALTERNATIVE.

Thank you for allowing me to voice my opinion on this proposal.

Ron Scoglio

0162**Will Hollo**

From: Michael Self <miguelsself@gmail.com>
Sent: Friday, May 18, 2018 12:42 PM
To: Scoping Comments
Subject: vote for

0162-1 | Eagerly await this long sought after marriage of two of the best managed resorts in the West. 😊

0162-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0163

Date submitted (Pacific Standard Time): 6/10/2018 9:23:18 AM

First name: Bruce

Last name: Seybold

Organization:

Title:

Official Representative/Member Indicator:

Address1: Po Box 8723

Address2:

City: Truckee

State: CA

Province/Region:

Zip/Postal Code: 96162

Country: United States

Email: brewsski22@yahoo.com

Phone:

Comments:

I strongly object to the Squaw Alpine gondola project. I find it unnecessary, a waste of money and it will be a constant eyesore to the upper Alpine Meadows valley. on the Squaw side it will look like just one more lift going up KT-22. At Alpine it will dominate the entire upper valley from the lodge all the way to the back of KT-22. At the moment there is nothing man made visible there except for Troy's lift towers. The span will tower over the Alpine parking lot and then be strung all along the ridge line. Hideous. The cluster of 7 Gasex devices is ugly as well. All this disturbance for a lift that will run from Thanksgiving to April at the very best. The comments of it being a life long dream are extremely exaggerated. Generally Squaw people ski Squaw, Alpine people like Alpine. The decision is made daily as you drive to the mountains. Each mountain is large enough to spend days skiing without needing more terrain. I predict the gondola will be lightly used. Better to serve the few by a few shuttles. This gondola is a gimmick to look good in advertising. The Disneyland effect is apparent in Squaw's propaganda, just look at the toy models in the lodges. This project is NOT worth the sacrifice!!

0163-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0164

Date submitted (Pacific Standard Time): 6/11/2018 1:44:45 PM
First name: Dane
Last name: Shannon
Organization:
Title:
Official Representative/Member Indicator:
Address1: PO Box 756
Address2: PO Box 756
City: Tahoe City
State: CA
Province/Region:
Zip/Postal Code: 96145
Country: United States
Email: c.dane.shannon@gmail.com
Phone: 5304485348
Comments:
To Whom it may concern,

0164-1

I am 100% completely against this project. It would be another Human-made scar in the Sierra that will never go away. It is just another failed direction that KSL corporation lack of marketing sight has tried to bring to our community. People come to the mountains to escape manmade structures and machines, allowing this will only ruin an easily accessible escape to the wilderness. We need places to go and not see manmade buildings or machines. There is something powerful about these pristine places that cleanse the soul and mind. We can't afford as a society to keep sacrificing these places that provide natural mental health care for no reason other than a marketing tool and lazy ski coaches trying to kill time in their lessons.

The damage the road to build the terminal, the trucks, machines, the greases and oils to keep it running, the lift towers, the people that just don't care littering, the noises, the eyesore of wires and the terminal... so many environmental impacts that are not needed. This lift is not needed. In the words of Theodore Roosevelt "Here is your country. Cherish these natural wonders, cherish the natural resources, cherish the history and romance as a sacred heritage, for your children and your children's children. Do not let selfish men or greedy interests skin your country of its beauty, its riches or its romance."

As representatives of our community, please represent our community and deny this project and protect us and the area from unneeded and unavoidable environmental impacts.

Thanks for listening to the community.

Best regards,

Dane Shannon

0164-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Jeff Shellito
326 Rivergate Way
Sacramento, CA 95831
June 10, 2018

Via E-Mail and U.S. Mail

Shirlee Herrington
Environmental Coordination Service
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

Eli Llano, Supervisor
Tahoe National Forest
631 Coyote Street
Nevada City, CA 95959

Heather Beckman, Associate Planner
Placer Count, Planning Services Division
775 North Lake Boulevard
Tahoe City, CA 96145

Joe Flannery, Wilderness & Winter Sports
Tahoe National Forest
10811 Stockrest Springs Rd
Truckee, CA 96161

Subject: Comments on the Squaw Valley Alpine Meadows Gondola EIR/EIS

Dear Ms. Herrington, Ms. Beckman, Mr. Llano, and Mr. Flannery:

I am a homeowner in Truckee and have been an alpine skier in this region since the early 1970's. For the past 13 years, I have been a yearly season pass holder at local ski resorts, including Sugar Bowl, Northstar, plus Squaw Valley & Alpine Meadows before and since they were acquired by KSL and began to be jointly operated.

Equally important, I was a longtime member of the Sierra Club (SC) and worked on the collective effort to secure federal designation of the Granite Chief Wilderness (GCW) 40 years ago when I chaired the GCW task force and served on the SC Mother Lode chapter Executive Committee.

In reviewing the joint EIR/EIS, it is clear that the Option #2 gondola alignment through the GCW has the most numerous and significant adverse environmental impacts and should not be approved under any circumstances. Although both of the other alternative alignment routes do not cross directly through the GCW, the alignment of Option #3 would still be congruent with a portion of the Congressionally-designated wilderness boundary and is therefore also inappropriate. All three alternative gondola alignments (including Option #4) will become permanent and intrusive structures built across the primary USFS trail the public uses for day hiking, backpacking and horse riding to access the GCW, particularly the popular Five Lakes area. Construction will entail massive disruption of an undeveloped, steep slope mountain landscape and removal an unknown number of trees & vegetation.

0165-1, Opinion (O1)

The comment expresses concern about impacts to the Granite Chief Wilderness as well as other recreational areas and loss of trees and vegetation. These issues are addressed in the Draft EIS/EIR in Sections 4.3, "Wilderness," 4.1, "Recreation," and 4.12, "Vegetation." As for tree removal, see Impact 4.12-3 for a discussion of the number of trees anticipated to be removed under each alternative. As noted on page 4.12-34, "[r]emoval of individual trees would be greatest under Alternative 3 (104 trees) compared to Alternative 2 (42 trees) and Alternative 4 (38 trees); however, more trees would be at risk of possible removal, damage, or mortality under Alternative 2 (286 trees) compared to Alternative 3 (133 trees) and Alternative 4 (176 trees)."

0165-1

0165

- 0165-2 | The EIR/EIS notes that for 6-8 months during gondola construction, the Five Lakes trail could be temporarily closed while towers are installed by helicopter, plus drilling and/or blasting activities are performed. Closure of this trail would totally deprive the public ANY access to the GCW and the popular Five Lakes area from spring through the fall or early winter of 2019. This is unreasonable and unacceptable, so additional mitigation measures should be required to limit such trail closures.
- 0165-3 | The EIR/EIS indicates that Squaw Valley has proposed measures to mitigate the impact of installing permanent towers and mid-mountain transfer stations, such as use of certain paint colors, requiring only wintertime operations during the ski season, plus removal and storage of the gondola cars at the base facilities in Squaw Valley and Alpine Meadows during the spring, summer and fall months. However, USFS and Placer County should require further mitigation measures. These are needed to mitigate: (1) the cumulative effects related to physical construction and operation of the gondola and mid-mountain transfer stations; and (2) growth-inducing impacts encouraging construction of the "White Wolf Resort" (WWR) development by the owner of the Caldwell private inholding upon which all 3 alternative gondola alignments would be built and facilitated. The planned White Wolf Resort will include more than two dozen new homes, plus tennis courts, stables, parking structures & other recreational features.
- 0165-4 | Specifically, I recommend that, if the USFS and Placer Co. approve any of the gondola alternatives, as additional mitigation for the gondola construction you should require the removal of all of the existing black towers shown in EIR/EIS maps as components of the unfinished "KT 22 South" chairlift. The placement and construction of the Squaw Valley Alpine Meadows gondola in any of the 3 alignment alternatives requires the cooperation or partnership by Squaw Valley/KSL with the owner of the Caldwell property inholding. Presumably, at a minimum, this includes payment of a substantial financial consideration for construction access and a permanent gondola easement across that property. It is reasonable to require removal of these existing and unfinished lift towers as mitigation for approving construction of 50 or more additional towers for a new gondola costing tens of millions of dollars.
- 0165-5 | Lastly, I am concerned that if you approve any of the 3 alternative gondola alignments, with the effect of Climate Change on winter snowfall and temperature patterns, this gondola could become a permanent "white elephant" like the two chairlifts the Tahoe National Forest approved that Sugar Bowl ski resort constructed across USFS land during the past 10 years. These were originally intended to provide Sugar Bowl skiers additional access to terrain and summits of Mt. Judah and Crow's Nest peak. But over the past two ski seasons, and despite a much-higher-than average snowfall during the winter of 2016-17, these new chairlifts were rarely operated by Sugar Bowl resort due to insufficient snow coverage and for cost saving reasons. I don't believe the Summit Chair ever operated this past winter. Plus, most (if not all) Tahoe area ski resorts had only limited terrain open during the 2017 Christmas holiday season.

-2-

0165-2, Recreation (R1)

RPMs REC-1 and REC-3 are included as a component of the project to provide mitigation for these trail closures. In particular, RPM REC-1 states that "...A project website will be developed for the public to ask questions about the construction process and schedule. Concerns related to dust, noise, odor, trail closures, and access restrictions associated with construction activities will be addressed within this program."

In addition, RPM REC-3 states that "Signs advising recreationists of construction activities and directing them to alternative trails will be posted at all trail access points or in locations as determined through coordination with the respective jurisdictional agencies. Signage describing the closures will be posted at trail access points one week prior to closures, will remain posted during the entire closure period, and will be removed upon completion of construction."

0165-3, Resources Protection Measures/Mitigation Measures (RPM/MM)

The comment states that the Forest Service and Placer County should require additional mitigation measures, but does not provide any details as to what these additional measures should entail. RPMs and mitigation measures are identified throughout the Draft EIS/EIR to reduce the project's potential environmental effects, including those related to the physical construction and operation of the gondola and mid-mountain transfer stations, as the comment suggests. The proposed White Wolf development, though considered in the Draft EIS/EIR as part of the cumulative effects analysis, is not part of the project. Therefore, mitigation measures to address construction-related effects of the White Wolf development are not included in the Draft EIS/EIR. This separate project would be subject to separate environmental review by the County, at which time mitigation would be identified and included as a condition of project approval. Cumulative effects of the gondola project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR.

0165-4, Project Description (PD)

0165

In conjunction with the proposal being reviewed within this EIS/EIR, neither the Forest Service nor Placer County have jurisdiction over the privately owned Caldwell Property and specifically the "KT South" chairlift project and therefore, do not have jurisdiction to require removal of the unfinished "KT South" chairlift. Whether Mr. Caldwell would complete or abandon his approved and constructed lift project in the future is speculative and is beyond the scope of this analysis.

0165-5, Greenhouse Gases (GHG)

The commenter is concerned that the proposed gondola will not operate frequently due to reduced snow levels associated with changing climate. This potential outcome is not an impact on the project that could result in increased risk of hazards (e.g., flooding, landslides) or other adverse environmental effects not already evaluated and identified in the EIS/EIR. Climate change is addressed in Section 4.11, "Greenhouse Gas Emissions and Climate Change," in the Draft EIS/EIR. See in particular the discussion under Impact 4.11-2, which describes the impacts of climate change on the project. The option of increasing shuttle service rather than building the gondola identified in the comment is addressed in the Draft EIS/EIR in section 2.3.2, "Alternatives Considered but Not Evaluated Further." Also see the Master Response above on the Improvements to Existing Shuttle System Alternative provided in Section 1.8, "Master Responses."

0165

0165-5 cont'd, Greenhouse Gases (GHG)

0165-5
cont'd

Earlier this year, scientists from the UCLA Center for Climate Science recently issued in a new report entitled "Climate Change in the Sierra Nevada." The report indicates under a business-as-usual climate trajectory, the state's snowpack may decline by up to 64 percent by the end of the century. The authors note that this year's below-average snowpack may represent what typical conditions may be like in the coming decades. Rising global temperatures are a major factor, but so are changes in overall precipitation patterns and a shift from snowstorms to rain like we experienced both earlier this year and in 2017.

Should warming temperatures and the predicted changes to wintertime snowfall patterns require Squaw Valley-Alpine Meadows to similarly modify or restrict operation of its chairlifts and affect terrain availability at either or both resorts, this could significantly affect the frequency and need to operate the proposed gondola. More importantly, the changes to Sierra Nevada precipitation patterns and snowfall predicted by recent studies suggest that building the gondola is unnecessary and a bad capital investment.

The EIR/EIS is flawed because it fails to discuss or analyze how predicted changes to wintertime snowfall and melting rates could adversely affect ski resort operations and, more importantly, the need for constructing a permanent gondola infrastructure for transporting skiers between the two resorts during the winter. That will only lead to pressure for eventually allowing Squaw Valley Alpine Meadows to operate the gondola as a revenue generating tourist attraction during the summertime months like it now does with the tram that transports tourists and hikers to its High Camp facilities. Maintaining or expanding operation of the free shuttle vans between Squaw Valley and Alpine Meadows during the winter ski season would provide the resorts more flexibility without the intrusiveness, environmental devastation and visual blight that a permanent gondola facility would entail, plus be cheaper.

Thank you for considering my comments and recommendations for the EIS/EIR.

Sincerely,

/S/

JEFF SHELLITO

Shirlee Herrington

From: Evan Smith <h2obuffalo@me.com>
Sent: Wednesday, May 30, 2018 3:42 PM
To: Placer County Environmental Coordination Services
Subject: Draft EIS for the gondola between Squaw and Alpine

To whom it concerns:

0168-1 | As a full time Alpine Meadows resident I feel strongly that the proposed gondola connecting Squaw Valley and Alpine Meadows has too many negative attributes to be acceptable. The gas ex explorers will be really loud, which will impact quality of life for residents. It's one thing to have a few gas ex, but 8 with the gondola plus the 4 they installed last fall is a lot! I'm all for avalanche control, but using it to control closed terrain for the gondola is unnecessary and unacceptable.

0168-2 | I also feel strongly about the 5 lakes trail impacts, Troy Caldwell's unfinished and unused lift is an eyesore, we do not need more. Overdevelopment will not make this place better, it will degrade it. Squaw is using this gondola simply as a marketing gimmick, people who've never been here will see that 6000 acres blurb on marketing material and think it's amazing, but in truth, it really changes nothing in positive ways and definitely creates many negative changes.

0168-3 | Squaw has a proven record of selfish, anti-community, company-town behavior and it is completely unacceptable. Squaw trumpets their social responsibility, but actually, when one looks at their record, it's quite small. They ask for donations for their avalanche dog program for example, when that is just something they should fund themselves. The narcissism and self-serving behavior that has been

0168-1, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0168-2, Opinion (O1)

Impacts related to the Five Lakes Trail are addressed in Section 4.1, "Recreation," and visual impacts are addressed in Section 4.2, "Visual Resources," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0168-3, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

01680168-3
cont'd

the norm the past 10 years now is making this area worse, and neither locals nor tourists deserve that.

Do not allow the gondola, enough is enough. Squaw has proven they have no regard for customer service or social responsibility, that is not an entity whom should be given further development rights.

Very sincerely,
Evan Smith

0168-3 cont'd, Opinion (O1)

Shirlee Herrington

From: Jim Smith <jimnjotahoe@sbcglobal.net>
Sent: Sunday, June 03, 2018 2:02 PM
To: Placer County Environmental Coordination Services
Subject: gondola

0169-1 | At first I thought the gondola was a good idea, but after putting more thought into it I think it's not such a good idea. I feel that on a big weather winter, the gondola won't run much due to winds that can blow through the area where the gondola will go which I hope has been thought about. There fore the connection between the two resorts will still have to be by shuttle bus. If you were to up grade the fleet of buses with all electric or propane buses that would be a positive for the environment and you could show the public that you are being as "green" as possible. I also feel that your money would be better spent up grading the lift system at Alpine Meadows for starters. They are rather behind the times as far as some of the lifts. That upgrading would cost far less than the gondola, and probably make a lot of people happy. The amount of terrain that the gondola would open is't that much in relation to the cost of the lift. The terrain that would open at Alpine wouldn't be that good after a storm due to the exposure of the area in Estelle Bowl and the Poma Rocks area. Since you seem to be getting more opposition to this proposal, may be you should be wiser with your money. Maybe you should put a weather station in the proposed gondola area and see what kind of wind recording you get to see if the lift would run enough to make it worth while to spend that kind on money on a lift that might not run much. I have been skiing Alpine Meadows and worked there for the past 47 years. Thanks for listening to my thoughts.

Jimmy Smith

0169-1, Alternatives (A)

Wind closures would be implemented as necessary to ensure safe operation of the gondola. Further detail on this matter is beyond the scope of this analysis, as the specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives.

Section 2.3.2.1, "Improvements to Existing Shuttle System Alternative," in the Draft EIS/EIR evaluates a potential alternative to the project that would involve improving the existing shuttle system and expanding it to provide enhanced access between the ski resorts. See the Master Response above on the Improvements to Existing Shuttle System Alternative provided in Section 1.8, "Master Responses."

Upgrading the lift system at Alpine Meadow, though not identified as an alternative in the Draft EIS/EIR, would (like the shuttle system alternative above) not meet the project's purpose and need. Therefore, it is not analyzed in this Final EIS/EIR.

0170

Shirlee Herrington

From: Joe Smith <truckeejoe47@gmail.com>
Sent: Friday, June 01, 2018 3:52 PM
To: Placer County Environmental Coordination Services
Subject: Squaw Valley Alpine Meadows Gondola Project

0170-1 To Whom It May Concern,

I am a 11 year resident of Truckee and spend significant time during all seasons in the area which is being considered for this project. Not unlike the Martis Valley project and the KLS project involving increased housing and the water theme park these projects push an increase in human activity while even the existing capacity is strained in regards to egress and digress. Hwy 89 is already maxed out. In addition the notion that you can shelter in place given the now historic velocity and intensity of the fires (Tubbs and Thomas Fire) is absurd. Those two factors alone should be enough to convince the BOS. Unfortunately only one of the Supervisor's live in this area so they have no personal or direct experience or knowledge of what this impact has otherwise they would already drop their support for such an I'll conceived development. It is time for everyone to simply be truthful and transparent. The movement and accumulation of more property tax revenue, the increase in profit and return on capital appears to trump logic and common sense. Once the projects become reality there is no reversal. There is no other Lake Tahoe Basin or surrounding environs. Nature did not design it to tolerate even the current human impact. Why in the world would anyone in their right mind compound the situation by adding more. Who is going to accept the blame if a Thomas Fire event which was consuming one acre per second hits our area on a red flag warning day trapping hundreds if not thousands of people with no plausible escape route.

Enough is enough.

Thank You for your consideration. Feel free to contact me.

Joe Smith
 10138 Colton Creek Rd
 Truckee, 96161
truckeejoe47@gmail.com
 530 536 6080

0170-1, Opinion (O1)

Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," of the Draft EIS/EIR.

Proposed operation and long-term maintenance of the gondola is described on pages 2-13 and 2-14 of the Draft EIS/EIR, which states that the proposed gondola would only be operational during the winter, and would therefore only increase visitation in the winter, when there is minimal wildfire risk. See Section 4.6, "Public Safety," in the Draft EIS/EIR. Specifically, see the discussion under Impact 4.6-1, which describes hazards (including wildfire hazards) associated with project construction, operation, and maintenance. Several RPMs are identified therein that wildfire hazards, although these are directed at project construction, which would occur during the summer months. As stated above, project operation would be limited to the winter months. Monitoring and enforcement of RPM implementation would be conducted by the Forest Service and the County.

Also, it is important to note that the Gazex facilities have been removed by Squaw Valley Ski Holdings (SVSH) as a component of the proposal. The Gazex facilities were a primary origin of the concern that wildfire risk would increase as a result of the project (because of the storage of oxygen and propane that is required for operation of Gazex facilities); because of their removal from the proposal, it is even less likely that wildfire risk would increase as a result of the project.

Will Hollo

From: Linda Speizer <speizer428@gmail.com>
Sent: Tuesday, June 5, 2018 12:52 PM
To: Scoping Comments
Subject: Squaw Alpine Proposed Gondola

0171-1 | Please do not approve the proposed gondola project at Squaw Valley.
The Granite Chief Wilderness and surrounding areas should be preserved
and kept as pristine and free from human development as possible.
Please do not allow profit motives from one company to adversely affect
what has been untouched for millions of years.
Thank you.
Linda Speizer
P.O. Box 2928
Kings Beach, CA 96143

0171-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0172**Shirlee Herrington**

From: Linda Speizer <speizer428@gmail.com>
Sent: Tuesday, June 05, 2018 12:09 PM
To: Placer County Environmental Coordination Services
Subject: Squaw Valley Alpine Meadows Gondola Project

0172-1 | Please do not allow the profit motives of one company to destroy what has been a pristine, untouched and unique area for millions of years. It is your job to protect these special areas. If you want more tax dollars build something in Roseville or Auburn. Please leave the Tahoe Basin alone.
Thank you.
Linda Speizer
P.O. Box 2928
Kings Beach, CA 96143

0172-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0173

Date submitted (Pacific Standard Time): 5/22/2018 11:52:22 AM
First name: James
Last name: Spenst
Organization:
Title:
Official Representative/Member Indicator:
Address1: 290 Revett Dr.#503
Address2:
City: Breckenridge
State: CO
Province/Region:
Zip/Postal Code: 804242
Country: United States
Email: jimspenst@me.com
Phone: 720-201-5363
Comments:

I support the concept of connection of Squaw Valley and Alpine Meadows through an aerial tramway. It is far and away better than the existing bus transportation both from a guest services perspective and reducing environmental impacts. all alternatives except the no action alternative would work well. Alternative 2 from a users perspective provides great views and access to KT22 and Buttress terrain. Given concerns about the lift alignment and proximity to Granite Chief Wilderness and potential impacts to the Sierra Nevada Yellow Legged Frog Alternative 4 appears as the best action alternative. I urge the USFS to chose Alternative 4 in approval of this project.

0173-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0174

0174-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0174-1

Date submitted (Pacific Standard Time): 5/24/2018 3:39:53 PM

First name: Jim

Last name: Spenst

Organization:

Title:

Official Representative/Member Indicator:

Address1: 290 Revett Dr. #503

Address2:

City: Breckenridge

State: CO

Province/Region:

Zip/Postal Code: 80424

Country: United States

Email: jimspenst@me.com

Phone: 720-201-5363

Comments:

I support the approval of this project by both Placer County and USFS. Connection of Squaw Valley and Alpine Meadows by an Aerial Tramway has been discussed for many years. An Aerial Tramway is a much better environmental and guest services solution for combining the two resorts than the current bus service. In the long run it is the best solution for seamless connection of the two resorts and combining both areas into one resort. Any of the alternatives 2,3 or 4 will work well. From a skier perspective and guest experience I prefer Alt2. I believe that the visual and environmental concerns on Alt.2 that arouse during scoping and field review were overstated and can be easily mitigated. It provides skiing from both mid- stations and the experience riding the tramway would be one of the best in the world. I do however think that the number of political hurdles make Alt.2 unlikely to be the preferred alternative in the process of EIS/EIR approval. I support Alt.4 as it moves away from the Granite Chief Wilderness Boundary and creates distance from the known population of Sierra Nevada Yellow Legged Frog(s) in Barstool Lake that is a concern of many with Alt.2

0177

Date submitted (Pacific Standard Time): 6/11/2018 1:47:38 PM

First name: Greg

Last name: Stach

Organization:

Title:

Official Representative/Member Indicator:

Address1: P O B 150367

Address2:

City: San Rafael

State: CA

Province/Region:

Zip/Postal Code: 94915

Country: United States

Email: gregstach@att.net

Phone: 01-415-456-6470

Comments:

KSL has big balls to propose building any transportation system OVER a wilderness area! And building one within visible and/or earshot range of a wilderness area is equally appalling! The Sierra Club was even required to remove a historic cabin, long in existence before the Granite Chief Wilderness area was created! So how can a commercial organization now be permitted to compromise this area?! Within the skiing community, the ones that will be served by this system, the majority are not in favor, particularly those that reside in or enjoy using the outdoors of the Tahoe Basin. I am a hiker, skier/back country skier, member of the Tahoe Trampers and one who has enjoyed this pristine gem year round for over 35 years, I feel many qualities of the Five Lakes area will be destroyed. And any mechanized system in or near a wilderness area will adversely affect the ecosystem as well. PLEASE STOP further commercial expansion of the Squaw Valley and Alpine Meadows areas with this ill conceived plan. Thank You for considering my objections.

0177-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. The comment makes reference to the Gondola crossing the Granite Chief Wilderness. While the gondola would cross through a portion of the congressionally mapped Granite Chief Wilderness (GCW) under Alternative 2, it would cross only through private lands located within the congressionally mapped GCW (in particular, through a 54.6-acre portion of the privately owned Caldwell property). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, these land use restrictions do not apply on private lands. Please refer to Section 4.3, "Wilderness" of the Final EIS/EIR for further information.

0178

0178-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0178-1

Date submitted (Pacific Standard Time): 6/5/2018 3:09:18 PM

First name: Arthur

Last name: Strauss

Organization:

Title:

Official Representative/Member Indicator:

Address1: 3007 Appling Way

Address2:

City: Durham

State:

Province/Region: NC

Zip/Postal Code: 27703

Country: United States

Email: artstrauss412@gmail.com

Phone: 6034758434

Comments:

I ski and hike at Squaw Valley and Alpine Meadows. I've had a seasons pass the last 4 years and ski 40+ days a year and hike about 10 days. I think the gondola would wreck the 5 Lakes Trail and thus the entire Granite Chief Wilderness. I'm not sure why KSL wants to build the gondola other than they think it will make them more money. I live in Camelian Bay for half of the year. Everyone who lives along the Alpine Meadows Road that I have spoken to does not think the gondola is a good idea. So, if most of the people who would be most affected by the project are against it why would the USFS permit it?

Shirlee Herrington

From: Robert Tetrault <bob.tetrode@gmail.com>
Sent: Monday, June 11, 2018 3:35 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: California Express - NOT!

We have lived at Alpine Meadows on John Scott Trail for more than 30 years. We are old and close friends with Troy and Sue Caldwell since the early 70's, and support their dream of their own ski area.

0180-1

However, the gondola brings too many negatives to the area: 1) directly adjacent to the Granite Chief Wilderness, 2) a flood of skiers from the intermediate stations of all Alternatives. 3) It is a falsehood that the gondola will relieve traffic; in fact, it will increase traffic from all of the skiers wishing to "check out" the new headliner chairlift. It will increase traffic most specifically in Alpine Meadows because Squaw already gets parked out and Alpine does too. But since Squaw parks out earlier, this will exacerbate problems at Alpine. 4) Primarily, however, the Alternative preferred by SquawAlpine will mandate a total of 8 new Gazex machines in Estelle Bowl. Since they have been installed on the ridge between Squaw Valley and Alpine Meadows Road, their explosions are *at least* 100X louder than the hand charges placed prior to this. Our steel-framed house literally shakes on its foundation every time they are set off. We do not want any more of them in Alpine Meadows. The ones protecting the Alpine Meadows Road have a very negative impact on every house in Alpine Meadows. Section 4.9.3 does not explore the *very* negative effect these devices have on residents in Alpine Meadows.

If you must approve this rube-goldberg eyesore, please direct your approvals to Alternative 4 with the least number of Gazex devices.

Sincerely,

Robert Tetrault
 Mary Coolidge
 2180 John Scott Trail

0180-1, Noise (N)

Impacts related to the Granite Chief Wilderness are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR.

As stated in the Draft EIS/EIR on page 5-13, "Although the project is expected to result in approximately 7,371 additional visitor-days per month (which would average to approximately 246 visitors per day), these additional visitors would be limited to short-term visits (i.e., a day or days) during the operating (winter season) (SE Group and RRC Associates 2018)."

Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," of the Draft EIS/EIR, including traffic generated by an anticipated increase in visitation.

Although the comment raises concerns regarding these environmental topic areas, no specific issues related to the analysis or conclusions in the Draft EIS/EIR are raised.

The comment refers to the Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0181**Will Hollo**

From: Phillip_imap <ptopping@pacbell.net>
Sent: Saturday, May 19, 2018 8:54 PM
To: Scoping Comments
Subject: Support for Squaw/Alpine's California Express Gondola

Dear USFS/Placer County:

0181-1

I support the California Express Gondola because it will make what is currently a once a year experience for me and my family an every day experience when we ski at Squaw Valley. We ski at Squaw about 15 days a year but only one at Alpine because it is such a hassle to ski at both in the same day. Alpine & Squaw in the same day is a spectacular combination.
Phillip Topping
Sent from my iPhone

0181-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: jmtornese@aol.com
Sent: Friday, June 08, 2018 12:35 AM
To: Placer County Environmental Coordination Services; comments@squawalpinegondola-eis.com
Subject: Gondola Project EIR/S - comments

Dear U.S. Forest Service & Placer County,

0182-1

We are writing to express our concern with the aerial gondola proposed from Squaw Ski Resort to Alpine. We hike the Granite Chief Wilderness and 5 Lakes area a lot during the summer with our friends. There are usually quite a number of people hiking on these trails. It is a beautiful and calming experience. We are especially concerned about the environmental impacts to this area. We already see some gondola supports overhead while hiking, which are very unattractive. Please don't make it worse!! We are also concerned with the potential development of the White Wolf project and the encouragement of more significant environmental impacts later.

In particular, Alternative 2 should NOT be allowed! There are alternative alignments that would not run through land designated by Congress for national wilderness protection. Even the project's most "environmentally superior" route would have 33 adverse environmental impacts, including traffic, loss of wildlife habitat and destruction of solitude & recreational activities, especially hiking.

PLEASE ALIGN THIS GONDOLA ROUTE AWAY FROM THE 5 LAKES AND GRANITE CHIEF WILDERNESS AREA. OTHERWISE, IT WILL NO LONGER BE "WILDERNESS" !!

Below are the important points to consider.
 Thank you,

Judith Tornese and Jerry Winters
 6770 Springs Court
 Tahoma, Ca. 96142

0182-2

- **Overall impacts:** Squaw/Alpine's proposed alignment (Alt. 2) has numerous significant environmental impacts and the greatest impacts to the Granite Chief Wilderness Area (GCWA). Given there are feasible alternatives available,
- **Traffic:** The gondola will increase traffic in the North Tahoe region and Tahoe Basin. All available mitigation options should be included to reduce this impact.
- **Recreation:** The new gondola will increase noise, degrade views, and detract from the overall wilderness experience along the Five Lakes Trail and within the GCWA.
- **Scenic views:** The gondola will degrade the scenic beauty of the area, including from within the GCWA. (Note: Alternatives 3 and 4 have the least amount of visual impact to the GCWA).
- **Growth-inducement:** The gondola would make the adjacent proposed "White Wolf Subdivision" - a 38-unit luxury home development with a clubhouse/lodge, ski resort facilities, warming hut, and ski lift - more likely to be developed in the future as the subdivision would

0182-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0182-2, Other (O2)

These issues are addressed in the Draft EIS/EIR in Sections 4.3, "Wilderness," 4.7, "Transportation and Circulation," 4.1, "Recreation," 4.2, "Visual Resources," and 5.2.3, "Growth-Inducing Impacts," of the Draft EIS/EIR. Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0182

0182-2 | connect to the gondola, leading to more growth and traffic in the future.
cont'd

0182-2 cont'd, Other (O2)

0183

Mr. Eli Llano, Supervisor
Tahoe National Forest
631 Coyote Street
Nevada City, CA 95959

Mr. Eli Llano.

Growing up in the Mad River Valley of Vermont, I got to witness the impact of a lift connecting two iconic mountains at the Sugarbush Resort; Mt. Ellen with Lincoln Peak. When the lift was originally purposed, the town's overall view of the project was the negative impact it would have on the environment and the natural homes of the wildlife, especially bears. The American Skiing Corporation, who had recently purchased the mountains, was installing this purposed lift and no one believed they could do all the things that they stated they would do with the project. ASC (American Skiing Corporation) as a corporation didn't really do anything right but they did everything they promised with this inter-connecting lift; they preserved wildlife, did all the right steps in the environmental impact to a minimum, and decreased traffic between the mountains. Since the years of the lifts installation, the area between the mountains has grown to be some of the best off-piste skiing, created a vast trail system for hiking and maintained the beauty of the wildlife by following all the steps they outlined to create this lift system while also decreasing traffic between the two mountains.

Watching the plan to execution process with ASC back in the late 1990s in the Mad River Valley, I have full confidence in the approach that KSL / Squaw Valley is taking in the "California Express" inter-connecting gondola. The leadership, company and individuals involved in this project are far superior in the process of planning to execution to the ones that lead the charge back in the Mad River Valley for their inter-connecting lift. The California Express would provide ease of access to iconic mountains, it would decrease traffic between the mountains, and it would provide access to numerous areas. I fully trust the team at SV | AM and KSL to complete the project in the manners that they have outlined to complete a needed step in the connection of two of the most iconic mountains in the world.

I want to write, with full confidence my support for the California Express. Through the expansion of recreation opportunities, the new access will provide more adventures for the visitors of Lake Tahoe via the access to new terrain for all (able body and disabled). Providing access to the outdoors is essential in this world, and the inter-connecting lift will do just that for all.

Thank you for your time in regards to this letter,



ROY TUSCANY
Reno, NV

0183-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0184

Date submitted (Pacific Standard Time): 5/23/2018 2:03:23 PM
First name: Jeff
Last name: Tweddale
Organization: BookingCenter
Title: President
Official Representative/Member Indicator:
Address1: 495 tramway unit 8
Address2:
City: Stateline
State: NV
Province/Region:
Zip/Postal Code: 89449
Country: United States
Email: jeff@bookingcenter.com
Phone: 7074861292
Comments:

0184-1

The proposed changes to squaw Valley, both to environmental sensitivity to the increased use in traffic, seem completely incomparable with the Tahoe we all know and love. Even though our company, booking center, helps promote tourism to Lake Tahoe, these large scale developments will have an adverse impact on the brand, and experience this lovely area. We urge the planning department to keep the human scale of Lake Tahoe development in mind, and not capitulate to developers trying to make more money. When it comes to preserving the Tahoe basin, smaller is better.

Thanks, Jeff Tweddale, President of BookingCenter

0184-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: JESSICA VANPERNIS <jess.vanpernis@me.com>
Sent: Friday, May 18, 2018 4:37 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: Please approve the California Express Gondola

0186-1

Good afternoon,

After reviewing the thorough environmental studies performed related to the proposed California Express Gondola project, I wanted to express my support for the project and encourage USFS and Placer County officials to approve it.

I support the gondola because I am a snowboarder who frequents both Squaw Valley and Alpine Meadows, and I see the value to our community in finally realizing the long-time vision of connecting the two mountains. I believe the connection will enhance the ski and ride experience, and has the potential to remove cars off the road between Squaw and Alpine.

Please approve an alignment for the California Express Gondola project and let this skier transport lift finally become reality. Thank you for your consideration.

Jessica VanPernis Weaver
Kings Beach, CA resident and Squaw Valley | Alpine Meadows season passholder

0186-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0187

Shirlee Herrington

From: Tricia Vastine <triciavastine@gmail.com>
Sent: Wednesday, May 30, 2018 4:52 PM
To: Placer County Environmental Coordination Services
Subject: Not in favor of AM/Squaw gondola

0187-1

As a full time resident of Alpine Meadows, I am not in favor of the gondola project. This gondola will only serve KSL and not the residents of these two valleys. I am worried about the environmental impact of the gondola on the granite chief wilderness area as well as the impact the gas ex cannons have on the underlying rock structure.

Thank you,
Tricia Vastine
2039 Bear Creek Drive
Alpine Meadows, CA

0187-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Will Hollo

From: Scott Vaupen <scottvaupen@gmail.com>
Sent: Thursday, May 31, 2018 12:52 PM
To: Scoping Comments
Subject: Alpine Squaw gondola

0188-1

I'm writing to give my full blown support to the gondola connecting the two ski resorts together. For too long, the traffic between the two resorts has been horrendous. I can't imagine the amount of pollution this has caused. Greenhouse gasses will be reduced since the horrible traffic will be alleviated. Thank you.

Sincerely,
Scott Vaupen
2090 Chalet Rd #9

0188-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0190

Ellie Waller Comments for the Record Placer County Planning Commission May 24, 2018
Alpine Meadows Base-to-Base Gondola and Gary Davis Parking Permit Revocation *(with additional comments not made during public hearing on both agenda items)*

ALPINE MEADOWS BASE-TO-BASE GONDOLA

0190-1

SIMPLY STATED: Keep the gondola alignment out of the "Congressionally" designated wilderness and design it to be low profile for a better visual outcome that will have less of a visual impact on Five Lakes and the wilderness experience which is another outdoor recreation arena.

This comes down to a skier experience at the expense of the environmentally superior and less scenic impacts alternatives.

0190-2

Be reminded that any number increase of people on SR 89 will exacerbate an already overburdened highway. Caltrans, Placer Sheriff and CHP tried a lane shift this past season unsuccessfully and ultimately creates additional evacuation impacts.

0190-3

Lastly, Martis Valley West Parcel is an excellent example of community pushback due to obvious scenic issues building atop a ridgeline, evacuation issues and unintended but real impacts to the Tahoe Basin.
Duly note the respect the community has for this commission for the extraordinary research and ultimately not certifying the Martis Valley West Parcel EIR that was sadly overturned by the Board of Supervisors and now in litigation.

From Staff Report

0190-4

Project Area and Land Ownership
The gondola is proposed in an area with complex property ownership and designations. The Squaw Valley resort is operated almost entirely on privately owned land. The majority of Alpine Meadows resort, however, is located on National Forest System (NFS) land and is operated under a Special Use Permit (SUP) with the Tahoe National Forest. Between them is the "Caldwell property", a private parcel through which the proposed gondola must traverse for the two resorts to be connected. The federally managed and protected Granite Chief Wilderness (GCW) is located immediately west of the proposed gondola alignment. The eastern Caldwell property line abuts the GCW, and a portion of the congressionally mapped GCW (discussed below) extends eastward onto the Caldwell property (Figure 1).
The privately owned lands within the congressionally mapped GCW make up a 54.6 acre "bulge" that extends from the National Forest System-GCW onto the Caldwell property (see yellow dashed markings on Figure 1 below). The federal Wilderness Act of 1964 prohibits development on national forest lands contained within congressionally mapped wilderness areas, with a primary goal of maintaining the untrammeled, natural and undeveloped quality of said lands, and to maintain the outstanding opportunities for solitude or primitive and unconfined types of recreation that exist on these lands (see DEIS/EIR Chapter 4.3 for full discussion). In 1984, Congress issued the California Wilderness Act of 1984, which identified a 25,256-acre area as the Granite Chief Wilderness. Within the congressionally mapped GCW are 177 acres of privately owned land (including the "bulge" described above) that are not afforded the protections of the Wilderness Act of 1964. The Wilderness Act of 1964 directed that the FS would attempt to acquire these privately held lands contained within congressionally mapped

Page 1 of 4

0190-1, Other (O2)

Impacts related to the Granite Chief Wilderness and visual resources are addressed in Sections 4.3, "Wilderness," and 4.2., "Visual Resources," respectively, in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0190-2, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," in the Draft EIS/EIR. Emergency evacuation is addressed on pages 4.6-8 and 4.6-9 of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0190-3, Other (O2)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0190-4, Other (O2)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

Ellie Waller Comments for the Record Placer County Planning Commission May 24, 2018
Alpine Meadows Base-to-Base Gondola and Gary Davis Parking Permit Revocation *(with additional comments not made during public hearing on both agenda items)*

0190-4 cont'd, Other (O2)

0190-5, Public Safety (PS)
The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0190-4
cont'd

wilderness areas so that they could be afforded the protections of the Wilderness Act of 1964. At the time of this writing, the 54.6 acre "bulge" on the Caldwell property has not been acquired by the FS and remains under private ownership. As such, the land use management direction and restrictions imposed by the federal Wilderness Act of 1964 do not apply to these lands (or any of the 177 acres of privately owned land within the congressionally mapped GCW). Development is permissible on these privately held lands.

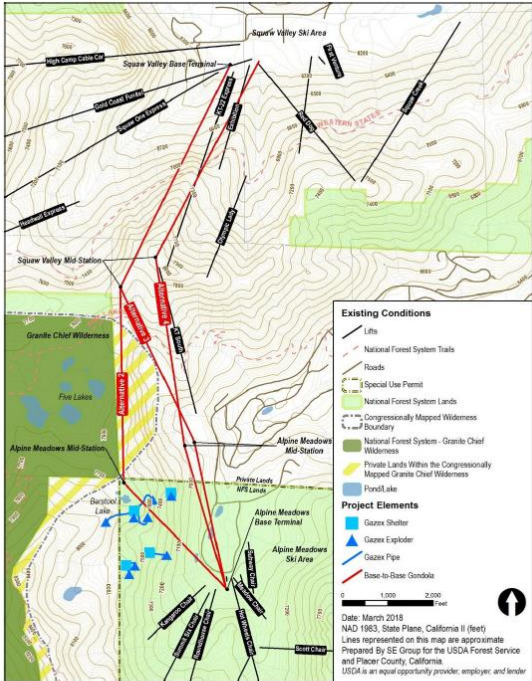


Figure 1: Gondola alternatives; land ownership and designations

0190-5

One other comment that I'm adding, not made during public comment, is the NEED to fully investigate, assess and determine potential public, health and safety issues related to the use of the gazex equipment to homes, people and the immediate environment it is built upon.

0190

Ellie Waller Comments for the Record Placer County Planning Commission May 24, 2018
Alpine Meadows Base-to-Base Gondola and Gary Davis Parking Permit Revocation *(with additional comments not made during public hearing on both agenda items)*

0190-6, Other (O2)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment.

No further response is warranted.

0190-6

GARY DAVIS BUILDING PARKING PERMIT REVOCATION – VARIANCE (VAA-3968)

I have attended many of the appeal hearings and submitted comments. Both Placer County and Gary Davis are responsible for errors made during this process. With that said, Staff brought forth a reasonable request for payment. It's time for the applicant to comply with the terms which have been greatly increased due to lack of requested payment. And Placer County processes must be re-evaluated and accountability mandated to insure this type of debacle doesn't happen again. Staff stated a \$20K check was being made available. \$30K is the required payment. *Respectfully, Staff must figure out a payment plan suitable to all. Not stated at public hearing: I believe the payment in full in any increments must be paid off within 24 months. This has gone on far too long! Take the \$ 20K and require the remaining \$10K be paid off monthly but not to exceed 24 months. And if not paid within 24 months, demolition required immediately which would be May 2020. This is a recommendation for June 14 hearing.*

Thirty (30) Day Payment Demand Letter

On February 9, 2018 Placer County Planning Services Division sent the Appellant, Gary Davis a letter via certified mail and electronic mail (Attachment C) summarizing the action of the Planning Commission from the December 14, 2017 hearing. The letter also informed the Appellant that, because there was no appeal filed of the Planning Commission's decision to deny the appeal and deny the variance modification that the conditions of approval remain in place. As such, staff requested in this letter payment of the outstanding amount of \$30,000 by March 16, 2018 to avoid the initiation of violation proceedings. To date, no payments have been made to the County.

DISCUSSION OF ISSUES

The parking Variance (VAA-3968) approved on October 17, 2002 allowed for a reduction to the number of required parking spaces required for the expansion of the Gary Davis commercial building. Condition of Approval No. 4 required the Applicant, Gary Davis, to pay a fee of \$30,000 prior to Building Permit issuance for the expansion. The fee was never paid prior to construction of the addition. The Applicant's later request to modify the Variance to eliminate this condition was denied by the Zoning Administrator, subsequently appealed by the applicant, and the denial was upheld by the Planning Commission on December 14, 2017. The Applicant was provided a written demand for payment (Attachment C) due no later than March 16, 2018. As of the date of this staff report, no payment has been made by the Applicant.

Allowing the Applicant additional time to correct the violation is not a solution that staff can support as it likely will not result in compliance with the conditions of approval. A substantial amount of time has already been provided to resolve the violation with no progress having occurred. In addition to the fact that the payment should have been made to the County in 2004 with the building permit that allowed for the expanded use of his property, no progress has been made towards compliance between April 2015, when the Appellant was informed of the violation, and today. Staff cannot recommend that the Planning Commission pursue a modification of the conditions as a path to gain compliance. It is staff's position that this option to modify the conditions of approval was the subject of the modification proceeding. The subject has been explored by the initial hearing before the Zoning Administrator in 2017 as well as the several subsequent hearings before the Planning Commission. It is also important to note that Mr. Davis did not appeal the Planning Commission's decision to deny his request to modify this condition to the Board of Supervisors. It is staff's position that Mr. Davis does not have the right to a "second bite of the apple" to discuss modification again. Based on the above and the fact that Mr. Davis has failed to pay the \$30,000 required in Condition of Approval No.4, it is staff's position that there is no other alternative but to pursue revocation of the variance.

Revocation of Variance (VAA-3968)

The ordinance states that, in the absence of an appeal, the revocation shall become effective fourteen (14) days after the action of the Planning Commission. Upon the effective date of revocation, the code official shall initiate nuisance abatement proceedings by preparing and serving a notice of nuisance pursuant to Section 17.62.180(B), with the time limit for action by the permittee specified in the notice being that set by the hearing body in the revocation order. The ordinance further states that, when an approved land use permit has been revoked, no further development or use of the property authorized

Ellie Waller Comments for the Record Placer County Planning Commission May 24, 2018

Alpine Meadows Base-to-Base Gondola and Gary Davis Parking Permit Revocation *(with additional comments not made during public hearing on both agenda items)*

0190-6 cont'd, Other (O2)

0190-6
cont'd

by the revoked permit shall be continued, except pursuant to approval of a new land use permit and any other authorizations or permits required by Chapters 5, 8, 12, 15, 16, 17 of the County Code.

Should the Planning Commission revoke the Variance (VAA-3968), Mr. Davis will be required to return the project site to the conditions that were present at the time the variance was approved. This will require that Mr. Davis obtain the necessary building permits for the demolition and reconstruction to allow for the breezeway that was enclosed to be demolished (removal of the 594 square foot addition). In addition, two parking stalls would need to be constructed where they had previously been located. The timing of which shall occur as outlined under the "Permit Revocation - Variance (VAA-3968)" in staff's recommendation.

RECOMMENDATION

The Development Review Committee recommends that the Planning Commission make the following findings and revoke the Variance (VAA-3968) as set forth below:

Findings

1. This matter is categorically exempt under CEQA Guidelines Section 15321 and Placer County Code Section 18.36.230 (Class 21- Enforcement Actions by Regulatory Agencies).
2. The property owner of record, Gary Davis (the "owner"), was given adequate and proper notice of the date, time and place of the hearing, and was given an opportunity to present testimony and evidence.
3. The owner was given adequate and proper notice of the condition alleged to be in violation of the Conditions of Approval, and was given a reasonable opportunity to resolve the violation and satisfy those conditions prior to the time of the revocation hearing. The owner was informed of the violation in April 2015 and has made no progress towards resolving the violation.
4. The owner applied for a modification of the Variance to eliminate Condition of Approval No. 4. The Zoning Administrator considered the request to modify the entitled Variance and denied that modification request. The owner appealed the decision of the Zoning Administrator to the Planning Commission. The Planning Commission considered the appeal and denied the appeal and denied the request to modify the Conditions of Approval. The owner did not appeal the decision of the Planning Commission.
5. The owner was provided with a Thirty (30) Day Payment Demand Letter on February 9, 2018, via certified mail and electronic mail, which summarized the action of the Planning Commission, identified the owner had not appealed the denial, and requested the payment of \$30,000 prior to March 16, 2018. The owner did not comply with the order.
6. The property described above (the "property") is in violation of the County Code Section 17.58.140.B (Conditions of Approval) in that the owner has not provided payment in the amount of \$30,000 as required by Condition of Approval No. 4.
7. Providing additional time or opportunity for the owner to voluntarily comply, beyond the 30 days provided, would serve only to allow the violation to continue.

Permit Revocation – Variance (VAA-3968)

1. The owner shall apply for a building permit to demolish the 594 square foot addition within 60 days of the effective date of the Planning Commission's permit revocation action; and
2. The owner shall remove all improvements allowed for by the Variance (VAA-3968) within 180 days of the effective date of the Planning Commission's permit revocation action. The owner shall also contact the Placer County Planning Services and Building Divisions once the removal has been completed for inspection and building final. In the event that said action is not completed within 180 days of the effective date of the Planning Commission's permit revocation action, the County will commence Nuisance Abatement proceedings pursuant to Placer County Code Section 17.62.160.

0191**Will Hollo**

From: David <dwwlaw@comcast.net>
Sent: Thursday, May 10, 2018 9:30 PM
To: Scoping Comments
Subject: Support for squaw-alpine chairlift.

0191-1

I support the proposed Squaw-Alpine (base-to-base) chairlift.
I feel it will help reduce traffic and related car exhaust and noise as well as enhance the attractiveness of Squaw Valley to out-of-state visitors (thereby increasing various tax revenues to Placer county such as transit occupancy tax and sales tax) which can be used for new bike paths, hiking trails, parks, etc. benefiting residents.

David Walters
201 Squaw Peak Road, no. 217
Olympic Valley, Ca
415 713/7670
Sent from my iPhone

0191-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Rick Wertheim <volunteerrick@gmail.com>
Sent: Friday, May 18, 2018 12:34 PM
To: Placer County Environmental Coordination Services
Subject: Comments on Squaw Valley - Alpine Meadows Gondola EIR

May 18, 2018

0192-1

This last year there were several gasex installed above Alpine Meadows road to control Avalanches. The explosions were extremely loud and scary. If I was outside walking my dog she would immediately run back home after an explosion. When inside the house she would hide in the deepest corner she could find and her whole body would shake for hours. Other dog owners I know confirm the same behavior with their dogs.

If this happens to dogs what happens to Bears, Coyotes, birds and tons of other wildlife in the forests.

I don't think this was properly discussed in the EIR. On the plans it looks like there may be as many as 8 new installations. These are all very close to Granite Chief Wilderness and the sound will be directed toward most of the homes in Alpine Meadows. I do not recall being able to comment on any of the installations above Alpine Meadows road or being warned about the extremely loud noise.

I realize the importance of Avalanche control. There must be a way to greatly reduce the noise levels of this equipment. Otherwise, an alternative like avalanche fencing must be used.

Rick Wertheim
1491 Upper Bench Road
Alpine Meadows, Ca. 96146
volunteerrick@gmail.com

0192-1, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0193

Date submitted (Pacific Standard Time): 5/22/2018 9:02:28 AM

First name: Andy

Last name: Wertheim

Organization:

Title:

Official Representative/Member Indicator:

Address1: P.O. Box 701

Address2:

City: Tahoe City

State:

Province/Region: CA

Zip/Postal Code: 96145

Country: United States

Email: andyinalpine@yahoo.com

Phone: 5303860734

Comments:

- 0193-1 | There is really only one reason to construct a gondola to connect Squaw Valley to Alpine Meadows. The reason is to create a Brand for marketing purposes. Basically a Brand that will lure more people to the area to fill the new rooms proposed for the expansion of the Village at Squaw Valley. A way to market Squaw Valley as a larger ski area to the world. It does not take a genius to figure out that more people mean more traffic and more impact to the surrounding area. More trash in the wilderness, more hikers on the trails, and just plain more people everywhere.
- 0193-2 | Of course the impact of larger numbers of skiers and snowboarders during the winter will overcrowd slopes that are already overcrowded, and in my opinion, dangerous during peak times. There is no doubt that the character of each area will change with the influx of larger numbers of winter sports enthusiasts. Where are these people supposed to ski or snowboard. At Alpine Meadows slopes are already overcrowded during weekends and holidays, especially when snow conditions are not optimal (as has been the case during the past few winters). Add thousands more to the lift capacity and the hill capacity arriving from Squaw Valley and you have a recipe for disaster. It has been bad enough over the last few winters with the somewhat limited use of buses to bring people from Squaw to Alpine when conditions at Squaw are not the best (low snow conditions with limited lift operations, high snow accumulations overnight, or high wind conditions with limited operations). Patrons are told to head to Alpine Meadows where more of the mountain is open, but Alpine also has limited operations on these days and thus the entire experience is nothing but an unhappy overcrowded mess (lines and more lines and more lines). Add people arriving via a gondola at 1800 per hour and you have a recipe for disaster.
- 0193-3 | When you attract more people to your resort which is the hope of the owner, then you automatically bring more traffic. Anyone who claims this is not true is just kidding themselves. If you claim more people will not show up, but just the same number as before, then you are dreaming.
- 0193-4 | If you claim that the gondola will not operate during the summer, then you are just lying. I can easily envision an argument in a few years, should the gondola be constructed, where the operator claims that operating just a section of the entire lift is not the same as operating the lift in the summer as originally approved. For example, Squaw Valley operates the gondola to the top of KT22 claiming it is not operating the entire lift and thus is not subject to the original agreement. Perhaps it is operated as a sightseeing opportunity for guests. Perhaps a restaurant is constructed at the top of the first terminal where guests can sit, eat, and view Lake Tahoe. Of course once that have arrived at the top of KT22, then why not take a short, easy walk to the famous Five Lakes Wilderness Area. It is certainly easier than hiking up from Squaw or Alpine. No matter what the applicant says, this will happen. By the way, how do you define summer. Does it include spring and fall?
- 0193-5 | Perhaps I should mention my disappointment with the applicants preferred location of the proposed gondola, but all of the proposed routes inflict pain with respect to the visual degradation of our mountainsides. Must we continue to infringe on what is left of our natural environment. Must I see steel towers, steel cables, and trash tossed out of gondola cars during the winter months when I am walking toward the wilderness? Is it important that we try to save the environment, just once, instead of continuing to infringe on it for the sake of profit?
- Development will never stop, but stopping it a few times is not going to ruin our economy.
Andy Wertheim

0193-1, Other (O2)

These issues are addressed in the Draft EIS/EIR in Sections 4.1, "Recreation," 4.3, "Wilderness," 4.7, "Transportation and Circulation," and 5.2.3, "Growth-Inducing Impacts." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0193-2, Recreation (R1)

These issues are addressed in the Draft EIS/EIR in Sections 4.1, "Recreation," and 4.7, "Transportation and Circulation," and 5.2.3, "Growth-Inducing Impacts." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted. The commenter's opinions and preferences will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors in rendering their decisions on the project.

0193-3, Other (O2)

These issues are addressed in the Draft EIS/EIR in Sections 4.1, "Recreation," and 4.7, "Transportation and Circulation," and 5.2.3, "Growth-Inducing Impacts." Consistent with the comment, it is assumed in the EIS/EIR that the proposed project will generate increased resort visitation, and the environmental effects of this increased visitation are evaluated in the EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0193-4, Project Description (PD)

Proposed operation and long-term maintenance of the gondola is described on pages 2-13 and 2-14 of the Draft EIS/EIR. The project description identifies no summer time operation for the Gondola, and this commitment is reinforced through RPM MUL-4, which provides additional parameters for seasonal operation. These operational conditions will be reflected in the Forest Service special use permit (SUP) and the Placer County Conditional Use Permit (CUP). Any changes to the seasonal operations will require amendments to these permits and

0193

subsequent NEPA and CEQA review. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0193-5, Other (O2)

These issues are addressed in the Draft EIS/EIR in Sections 4.1, "Recreation," 4.2, "Visual Resources," 4.3, "Wilderness," and 4.7, "Transportation and Circulation." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0194

I submitted many of these comments originally and they were not responded to. I am submitting them again and expanding the comments. Please thoroughly respond.

0194-1

The applicant is not currently an adequate operator of public assets

This project centers around an extremely large capital investment into Squaw Valley and Alpine Meadows by KSL Resorts and Squaw Valley Ski Holdings, LLC (KSL). Ironically, the scoping meeting on May 9th 2016 was the day after KSL prematurely closed Alpine Meadows for the season. Considering the snow pack, this is a historically early closing date. Adding to the irony, is the report of extremely high visitor numbers this season. This should have put KSL on financially solid operational footing. Additionally, KSL again sold a landmark number of season passes. Yet they seem unable or unwilling to provide the same level of service to the community that was historically provided by previous business operators. Similar to the early closing, KSL has a deferred opening schedule at Alpine Meadows. They also have reduced operations earlier than necessary and earlier than previous tenants have shown to do. This operational modality has continued during the following seasons. During the recent 2017/2018 winter Alpine Meadows was closed early again. Skiers were forced to ski upper mountain at Squaw Valley via the Funitel and when they finished their ski day they had to download the Funitel because there was not snow on lower mountain at Squaw Valley. However, for weeks following the closure of Alpine Meadows, it was still possible to ski top to bottom without downloading. The operators have demonstrated through actions that they do not desire to operate Alpine Meadows to its full capacity. Cost cutting measures seem to be prioritized at Alpine Meadows. Based on that, we must ask ourselves why would we impact the environment at all to provide more access to Alpine Meadows when the operators currently avoid with purpose, operating this facility at its highest level?

This discussion weighs into the business side of KSL. Applicants in this setting often will claim the business side is off limits. However, when public agencies are asked to approve public lands and assets for use by a commercial entity, the business aspects must be considered within the scope of the approval process since business decisions and policies clearly affect the impact, both good and bad to the public.

As illustrated above, KSL currently does not adequately operate the business. KSL's policies of limiting operations are an intentional business decision in order to limit costs. Additionally, it has been suggested that Alpine Meadows has been deprecated to a degree by KSL in order to drive more visitor traffic to the more amenity rich enterprise of Squaw Valley. Without a full examination of the policies and decision making of the applicant, it is hard to say exactly why they are unable to operate the facilities on par with previous tenants. Nevertheless, there are two clear possibilities. They are either choosing to limit operations in order to lower costs and magnify the visitor use of Squaw Valley over Alpine Meadows; or they are limiting operations because they are failing to run the business properly. Either way, they are providing a lesser utility to the users and community than previous tenants. This has not been examined appropriately by the EIS and I request that it be responded to.

The initial estimation of the investment for this project has been a minimum of 25 million dollars. This represents a very serious investment that will have undeniably large impacts on the business operations of the applicant. Yet, we must remember, that this only represents the initial investment. After the Gondola is built it must be operated and maintained. This will be a costly and ongoing expense. A question this discussion points

0194-1, Other (O2)

The comment provides an opinion regarding the merits or qualities of the project, the quality of on-going operations, but does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

As part of the County's project approval process, the project applicant would be required to adhere to various conditions of approval that are monitored by the County through a variety of permit processes as listed below.

1. Development Review Committee
2. Improvements Plan Approval
3. Improvements Construction Inspection
4. Encroachment Permit
5. Final Map Recordation
6. Acceptance of Project as Complete
7. Building Permit Approval

Further, the project applicant would be required to implement RPMs and mitigation measures included in the project's Mitigation Monitoring and Reporting Program (Appendix I to the Final EIS/EIR). Responsibility for ensuring that required RPMs and mitigation measures are implemented rests with the Forest Service and Placer County.

0194-1
cont'd

to is if KSL cannot currently operate the facilities on par with historical operations, than how would investing this much capital and saddling themselves with additional maintenance costs allow them to better operate the business? By all logic, this would likely lead to more limitations in operations. What is the estimated cost to run and maintain this new Gondola? These are key questions you must consider. Has the applicant been asked this question? Using public assets for commercial interests is a privilege. If KSL has not proved to be a good operator of their current public assets, then it would be a mistake to give them more public lands. Allowing the use of public lands comes with an express or inherent promise that the public lands are actually used and done so in a way that best serves the public. It has been shown that KSL have been a below average at best steward of this public asset. We should therefore not give them more. Please respond.

0194-2

Shuttle System

The EIS is unclear in terms of what will happen to the shuttle system if an action alternative is selected. It clearly indicates that the shuttle system will continue if no action occurs. As part of the traffic analysis you reduce the traffic output with the idea that the Shuttle system will not run if the Gondola is operational. But I see no commitment to this in the individual alternatives. This plan would indicate that the applicant would still maintain all the infrastructure for the shuttle system and would simply not use it. That requires a great deal of investment and maintenance into infrastructure from buses, bus stops, drivers, etc to simply let it idle. Please clarify whether the applicant will run the shuttles or not while the gondola is present? Will we have unnecessary duplicity in transportation between the resorts if an Action plan is selected?

0194-3

Shuttle System is more dependable

Roadway access to the ski resorts is a prerequisite to all operations of the ski resort. If the roads are accessible, then the current bus system can operate. Thereby, anytime users can access the ski resort, the Squaw-to-Alpine shuttle transportation system can operate. However, Gondola systems have more limitations. The roads must be cleared to even begin prepping the proposed Gondola for use. By this notion the bus system will always be ready to function before the Gondola. Additionally, wind and other weather factors will limit the Gondola opening. In many cases, wind conditions will not close the Gondola, but will force it to run slower. The Gondola also requires access by large snow machines to operate.

This is no surprise. If you examine the operations of any ski resort, you will see that all lifts are limited by various environmental factors. Even if this simply means the lift has frequent delayed openings and early closings this still adds into the equation where the Gondola will never be able to function as well as the existing transportation system. How can we justify impacting the environment for a transportation system that can't completely justify removal of the existing transportation system? Please respond.

Only 2.7% of visitors use shuttle system

0194-4

The EIS concluded that the shuttle system is only used by 2.7 % of guests because the shuttle system is inadequate. Could we not just as easily jump to the conclusion that guests don't actually want to travel between

0194-1 cont'd, Other (O2)

0194-2, Project Description (PD)

SVSH has indicated that they do not intend to operate the present shuttle system during times when the proposed gondola is in operation. Shuttle system infrastructure would be maintained with implementation of any of the action alternatives, for use during inclement weather that precludes operation of the gondola.

0194-3, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Section 2.3.2.1, "Improvements to Existing Shuttle System Alternative," in the Draft EIS/EIR evaluates a potential alternative to the project that would involve improving the existing shuttle system and expanding it to provide enhanced access between the ski resorts. See the Master Response above on the Improvements to Existing Shuttle System Alternative provided in Section 1.8, "Master Responses."

Wind closures would be implemented as necessary to ensure safe operation of the gondola. Further detail on this matter is beyond the scope of this analysis, as the specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives.

0194-4, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Section 2.3.2.1, "Improvements to Existing Shuttle System Alternative," in the Draft EIS/EIR evaluates a potential alternative to the project that would involve improving the existing shuttle system and expanding it to provide enhanced access between the ski resorts. See the Master Response above on the Improvements to Existing Shuttle System Alternative provided in Section 1.8, "Master Responses."

0194

0194-4 cont'd | two resorts? If we did support this conclusion then it would seem that this project should not be supported. Please explain how the former conclusion is more likely than the later?

Ski terrain

0194-5 | It must be noted that the proposed mid-stations would not result in a single acre of additional terrain. The applicant themselves stated this in the Q&A at the scoping meeting. Where is the benefit?

Mid-station ski access is negligible

0194-6 | The applicant may suggest that while there is no additional terrain, that there is a benefit because of additional access provided by the mid-stations. However, current operations suggest otherwise. On the Squaw Valley side, the mid-station will be somewhere on the KT22 ridge essentially adding an additional access point to the terrain serviced by KT22. However, there is already a second chair that accesses this terrain called Olympic Lady. Yet, KSL only operates this chair minimally. Olympic Lady operates less than 10% of the ski season and that is a generous estimate. If the applicant cannot rationalize operating this chair, why would they add a third access point to the same ski terrain?

On the Alpine Meadows side, the location of the mid-station will be in the vicinity of the Buttress ski terrain. This terrain is currently accessed by skiers through hiking. The hikeable ski terrain at Alpine Meadows is culturally valued by the local community and visitors. Prior tenants even viewed it as a business positive, by using it as a marketing opportunity with slogans like "Take a walk at Alpine Meadows." In fact, across North America, Sidecountry skiing has become a most popular attraction. And how fitting is it that much of this sidecountry terrain is on forest service land. This seems to be a circumstance which the forest service and the county would want to preserve. Putting a mid-station lift here will ruin this skiing. KSL uses the slogan "The Soul of Skiing" to describe how they operate the ski resorts. I would advocate that the walk to the Buttress area represents exactly the soul of skiing. By this logic, the mid-station would result in the ski community losing culturally significant ski terrain.

Additionally, Squaw Valley both traditionally and currently has a practice of limiting highly advanced and hazardous terrain on weekends and during busy visitor times for safety reasons. For instance, the famed Palisades at Squaw Valley is closed most weekends. Many gates accessing Silverado terrain are also closed during weekends. This terrain is comparable to the Buttress and the Cathedral of Estelle Bowl. This terrain is currently naturally limited at Alpine Meadows because it requires a skier to endeavor in a significant hike to get there. The mid-station would remove all access barriers. Therefore, if KSL applies the same standard they currently apply, they will have to more frequently close this terrain for safety. This would mean the mid-station would result in less skiing, not more. Was the applicant queried regarding this? Please respond.

Lack of Beginner Terrain

0194-7 | One of the underlying premises of the project is to make more beginner terrain available to guests via Alpine Meadows. The mid-station option at Alpine Meadows drop skiers off at either expert terrain or terrain that is rarely skiable. Please respond.

0194-4 cont'd, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0194-5, Project Description (PD)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0194-6, Recreation (R1)

Please refer to the text within Impact 4.1-1 (Alt. 2) in the Final EIS/EIR, below sub-header "Ski Area Facilities and Recreation Experience," for a description of impacts that may occur to skiable terrain within *the Buttress* and *Bernie's Bowl* areas as a result of implementation of Alternative 2. While potential changes to the recreational experience of this terrain may occur with implementation of Alternative 2, these changes would not have the effect of altering the overall NEPA or CEQA effects conclusions as listed in Section 4.1, "Recreation." This is because the improved resort connectivity that would occur with construction of the gondola would be anticipated to outweigh these potential changes within *the Buttress* and *Bernie's Bowl* terrain.

The remainder of the comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0194-7, Alternatives (A)

The commenter is correct that the project would improve access to beginner terrain at Alpine Meadows, as discussed in Section 1.1 of the EIS/EIR. It is intended that the Squaw Valley ski and snowboard schools, and others utilizing the gondola to access beginner terrain at Alpine Meadows from Squaw

0194

Valley, would offload at the Alpine Meadows base terminal rather than the mid-station. The project does not imply that there is beginner terrain available from either of the mid-stations, but, rather there is comparatively more beginner terrain generally available at Alpine Meadows.

0194

0194-7
cont'd

Alternative 2 is predominantly expert terrain only. Has this been addressed?

Alternative 3 and Alternative 4 in particular does not have snow on it often. Has this been addressed?

0194-8

Operating mid-stations independently?

Why would we want the mid-stations to operate independently? As far as I can tell the driving impetus of this project, or at least the one presented, is to connect the two mountains. Why add the costs? In what scenarios would this be run in this format?

0194-9

Why no alternative without an Alpine Meadows mid-station?

The Alpine Meadows mid-station appears to provide limited skiing, very limited if no beginner skiing, requires adding a massive amount of Gasex infrastructure and likely snowcat grooming around it. This is a massive undertaking to give access to terrain that is not suitable for the type of guests the underlying basis for the proposal caters to. Why disturb all this earth and install all this infrastructure that is only necessary for this mid-station, when we won't be catering to the guests. Why is there no Alternative without an Alpine Meadows mid-station?

0194-10

Operating impact of Gondola

You must weigh the impact of not just building the gondola, but also operating it. Access and operations are dependent on snow machine access. Maybe the Gondola will be quiet, but this equipment is not. The equipment also operates on fuel. This should have been considered in the environmental impact study. There are no snow machines currently allowed on much of this terrain. I have heard arguments that the Gondola will be better on the environment because it uses cleaner energy than the buses and it will be quiet. This argument could be mitigated by investing in clean vehicle technology, but even outside of that, we must now consider that not only are we operating a Gondola in this terrain, but also noisy fuel guzzling snow machines including both groomers and snowmobiles. Please point me to where this was addressed in the EIS?

0194-11

Private Land Use

This development is contingent on partnership arrangements between Troy Caldwell and KSL. This relationship further complicates the situation. Each partner has different interests and plans. Partnerships fail or change. It is usually just a matter of time. In fact, since this proposal has been put forward KSL is now Alterra.

What happens to the Gondola when this partnership fails whether it does so in the near term or the long? What happens if KSL sells the property to another party and then the relationship between this new party and Troy Caldwell deteriorates? Please point me to where the EIS responded to this query?

At the very least, the investigation should have included a full inspection of the partnership agreement and rate it for sustainability and fail points. You must evaluate the degree that the legalese makes this agreement permanent because the construction of this project will certainly be difficult to undo and cause further impact if it must be reversed.

0194-7 cont'd, Alternatives (A)

0194-8, Project Description (PD)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0194-9, Alternatives (A)

The Alpine Meadows Mid-Station is described in Section 2.2.2 of the Final EIS/EIR. Both mid-stations are necessary to redirect the gondola (effect a turn in the alignment) to the base terminals. Additionally, both mid-stations are necessary to ensure independent operation of each side of the gondola; that is, the segment from the Alpine Meadows base terminal to the Alpine meadows mid-station could operate (powered by the Alpine Meadows base terminal) even if the Squaw Valley portion of the gondola were not operational. Passengers would be allowed to embark and disembark at this mid-station under Alternative 2 during the winter season. Under Alternatives 3 and 4, passengers would not be allowed to embark or disembark at this mid-station with the exception of the property owners and/or guests of the residences proposed to be built with the Caldwell property development.

0194-10, Project Description (PD)

The project description in Chapter 2 provides information related to long-term maintenance of proposed infrastructure. In particular, page 2-11 notes that for the Alpine Meadows mid-station, "Winter maintenance and emergency access would be provided to this facility over-the-snow using snowmobiles and snowcats along the same temporary construction access route identified in Exhibit 2-2."

Section 4.10, "Air Quality" includes discussion of emissions related to this component of the project. Emissions generated by maintenance activities, including off-road vehicles used to access gondola infrastructure, are discussed in Section 4.10.3 of the EIS/EIR. Maximum daily emissions would not exceed

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applicable PCAPCD thresholds of significance for any criteria air pollutant or ozone precursor and would not conflict with regional air quality planning efforts under any action alternative. Vehicle exhaust emissions associated with maintenance personnel during the off-season are discussed in Section 4.11.3 of the EIS/EIR.

However, the commenter is correct that noise impacts of these maintenance activities are not disclosed in the Draft EIS/EIR. Summertime maintenance would primarily involve operation of the gondola to move cabins and this activity is addressed in the noise section. Wintertime maintenance using over the snow vehicles would be infrequent and would involve using equipment that already operates in much of the project area as part of normal resort operations. These vehicles would not result in a new source of substantial noise. The Final EIS/EIR has been updated accordingly. Please refer to the discussion of Impact 4.9-3 in Section 4.9, "Noise" for further information.

0194-11, Other (O2)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. See response to comment 0194-1, above, regarding conditions of project approval.

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- 0194-12 | **Caldwell has already shown to be a bad operator**
For many years now, we have stared at lift towers on Troy Caldwell's land that have sat vacant and idle. I object to starting another project on his property when he has failed to complete a similar prior project.
- 0194-13 | **Violation of the USFS objective to obtain private wilderness lands**
The USFS has a requirement that they acquire private lands inside the wilderness boundary. Part of the project goes through land that is private but designated as wilderness. Approving this project will forever end any attempt to acquire this land which is designated as wilderness. This seems like a very bad precedent to set for the sake of commercialization. Also, please reference the Private Land Use comment. If you were to consider approving such development of private wilderness land, I would think you do so only in the perfect situation. This partnership adds further risk to the situation. USFS, please respond?
- 0194-14 | **Pacific Crest Trail Impact**
This development is not just near any forest area, it will occur very near the PCT. Further development so closely adjacent to this iconic trail is a most serious impact. Is it worth sacrificing the sanctity of these iconic trails in order to enhance an already large resort?

The mid-stations will be giant structures. No matter how much attention is put into the look and feel, they will still be large structures permanently changing the skyline of the Sierra Crest.
- 0194-15 | **Gazex Avalanche Structures**
We currently have a functional avalanche management system for the Buttress area. Adding, physical buildings will be a year round eye sore at best. It may also impact the skiable terrain. Will the Buttress now have big pipes in the way of the ski lines?
- 0194-16 | **Will you be opening a pandora's box?**
If you approve the base-to-base gondola will you be enabling further development and impact? KSL and Troy Caldwell have both indicated that they are already planning additional projects in the area subsequent to this project. For instance, the Rollers lift. This is extremely concerning. Are you considering all this impact and how there will be a domino of development that follows this project if you approve? Please respond.
- 0194-17 | **Traffic**
The Action alternatives indicate significant and adverse impacts on traffic. North Lake Tahoe already experiences significantly adverse and challenging traffic conditions during ski season. The EIS says while traffic conditions would worsen, they would not reach a level where they would be considered unacceptable. We currently have stopped traffic on weekends. What exactly is the definition of unacceptable and how can adding to stopped traffic not be unacceptable?

0194-12, Other (O2)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. See response to comment 0194-1, above, regarding conditions of project approval.

0194-13, Wilderness (W2)

The federal government has no requirement to acquire private lands inside a wilderness boundary; instead, as stated on page 4.3-5 of the Draft EIS/EIR, "the federal government *can* acquire private inholdings within the perimeter of a wilderness area *only with concurrence from the owner* or if the acquisition is specifically authorized by Congress (16 United States Code 1131-1136)" (emphasis added). It is further noted that the privately owned Caldwell property is not situated *within* a designated wilderness area -it is adjacent to the National Forest System-GCW. Please refer to the introductory portion of Section 4.3 for further clarification.

Impact 4.3-5: Effects on Potential Wilderness Characteristics on Private Lands within the Congressionally Mapped GCW provides analysis related to this issue. Please refer to page 4.3-13 of the Draft EIS/EIR for further information.

0194-14, Recreation (R1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0194-15, Project Description (PD)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex

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avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0194-16, Cumulative Effects (CE)

The Rollers lift is an unimplemented, planned chairlift (proposed as part of the Alpine Meadows Master Development Plan). Its bottom terminal would be near the Alpine Meadows mid-station under Alternative 2 (meaning that under Alternative 2, skiers could exit the gondola at the Alpine Meadows mid-station and get on the Rollers lift). The Rollers lift is included in the Draft EIS/EIR's list of cumulative projects (see Table 3-3 and Exhibit 3-1; see Alpine Meadows Master Development Plan, map label 1), as well as the White Wolf Project proposed by Troy Caldwell. Cumulative effects of the project in connection with other probable future projects (including the Rollers lift and White Wolf Project) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR.

Regarding the comment that project approval would result in a domino of development, see the discussion above about the cumulative impacts analysis provided in the Draft EIS/EIR. The probable future projects listed in Table 3-3 are in various states of approval/implementation. As described on page 3-10 of the Draft EIS/EIR, and in accordance with NEPA and CEQA, these projects:

are partially occupied or under construction, have received final discretionary approvals, have applications accepted as complete by Federal, state or local agencies and are currently undergoing environmental review, or are proposed projects that have been discussed publicly by an applicant or that otherwise become known to a local agency and have provided sufficient information about the project to allow at least a general analysis of environmental impacts.

Table 3-3 lists each project's approval/implementation status in a separate column. These projects are subject to consideration and review by the applicable lead agency. Depending on the circumstances of each application and the lead agency's ability to make the necessary findings in each case, projects may be approved or denied. Approval of the proposed gondola project would not indicate that other projects in the area would also be approved and implemented.

0194**0194-17, Transportation and Circulation/Traffic and Parking (T&C/T&P)**

The comment, which relates to traffic conditions in North Lake Tahoe, requests a definition of how unacceptable traffic operations is determined and how adding to this condition should not be considered unacceptable. It also asks why more substantial mitigation measures, such as new roads, were not required.

Pages 4.7-5 through 4.7-10 describe the methods used to measure traffic operations including the use of level of service (LOS) to qualitatively describe system performance. The determination of whether a given operating conditions is acceptable or not is based on the standards of the jurisdictions that owns and operates that facility. Pages 4.7-15 through 4.7-17 describe the adopted (either in planning documents or route concept reports) standards used to determine each study facility's minimum acceptable operating conditions. For conditions that are already (or projected to be) at unacceptable levels, criteria are provided in these documents for the degree of worsening that should be considered significant. These criteria are listed on Pages 4.7-32 through 4.7-34. Page 4.7-34 also provides a narrative discussion of how a minor addition in traffic, if not noticeable to an average driver, is typically not considered significant. For example, according to Table 4.7-18, during the Saturday AM peak hour, the project would result in SR 89 south of Alpine Meadows Road experiencing an increase in two-way traffic from 979 to 1,013 vehicles. This three percent increase would translate into one additional vehicle every two minutes, which is not noticeable, given that the highway is currently serving an average of 18 vehicles per minute. With regard to new roads or roadway widening, right-of-way and environmental constraints preclude such opportunities (see page 4.7-15).

0194-17 cont'd The planned mitigation measures appear to be minor. Lane closures and coning plans are currently in use, but have not satisfactorily improved the traffic problem. If we add more traffic from this project, I can't imagine how this methodology would suddenly work. Why is no major mitigation planned such as new roads?

0194-18 **Conditions**

If the project is approved, I believe we need to apply restrictive conditions. Here are a couple conditions that would be appropriate to insure the proper use of these public assets:

1. Require proper use of the public lands

If KSL is confident it can afford an investment and ongoing expense of a new Gondola, then make the approval and any lease of public lands contingent on them properly using the public lands. The public is allowing this lease for a ski resort to operate. So, require just that. This can be done by requiring them to initially open and keep the ski resorts, both Alpine Meadows and Squaw Valley, open for skiing when possible. There are very simply litmus tests that can be applied to enforce this such as snow pack measurements.

2. Non-Transferable Condition

KSL is a developer. Developers are often essentially house flippers on a much larger scale. If you look at their business historically, they frequently invest in property, attempt to improve it and then sell it. For instance, shortly after they invested into Squaw Valley and Alpine Meadows, they sold five previously acquired resorts to Omni Hotels for nearly a billion dollars. This Gondola project may simply be KSL improving the property in order to prepare it to be sold for a profit. In order to insure stability, I believe if you approve this project, you need to put a non-transferable condition on the lease so if they sell the business, the public can approve of the new owner.

The cost benefit equation

0194-20 When doing an EIR you have to weigh benefits to the community and users versus the impact. In this case the benefits are slim. We gain no new skiable acreage. We are duplicating a transportation system that already exists. The benefits appear extremely small for the community and users. Therefore if you approve this, the impact must be tiny. The EIS has shown that various adverse effects will take place. Therefore this project should not be approved.

I advocate the No Action Alternative – Alternative 1 plan. Despite the extensive research, investment and studies completed, the alternative options with action are not suitable and create many negative impacts. I recommend that both the Forest Service and Placer County should deny this applicant.

If approved, this project will undeniable forever change the landscape of sierra crest. It will affect the everyday lives of the residents. It will have a lasting effect on the environment and community. I implore you to carefully examine the issues, both the environmental and community impacts. Please consider not just the impacts but also the benefits. The cost benefit equation must calculate in order to approve. You must weigh your decision with extreme prejudice because if this project commences, it is not something that can be undone.

0194-17 cont'd, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0194-18, Resources Protection Measures/Mitigation Measures (RPM/MM)

The Forest Service and Placer County will review and consider the environmental analysis as well as public comments received during the environmental process when making a decision regarding the project. As part of the County's project approval process, the project applicant would be required to adhere to various conditions of approval that are monitored by the County through a variety of permit processes as listed below.

Development Review Committee Improvements Plan Approval
Improvements Construction Inspection Encroachment Permit
Final Map Recordation Acceptance of Project as Complete
Building Permit Approval

Further, the project applicant would be required to implement RPMs and mitigation measures included in the project's Mitigation Monitoring and Reporting Program (Appendix I to the Final EIS/EIR). Responsibility for ensuring that required RPMs and mitigation measures are implemented rests with the Forest Service and Placer County.

0194-19, Resources Protection Measures/Mitigation Measures (RPM/MM)

The comment focuses on the project applicant and potential project profitability. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted. See response to comment 0194-18, above, for a discussion of the conditions of approval, RPMs, and mitigation measures that the applicant will be required to implement.

0194-20, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the

0194

Placer County Planning Commission and Board of Supervisors
before a decision on the project is rendered.

Shirlee Herrington

From: John Wilcox <jwilcox228@gmail.com>
Sent: Thursday, May 10, 2018 3:08 PM
To: Placer County Environmental Coordination Services
Subject: Base to Base Gondola EIR/EIS (Squaw Valley to Alpine Meadows)

0195-1

This is to express strong support for the proposed Gondola Project.

I have hiked the Five Lakes Trail at least 20 times in the past 25 years and am very familiar with all of the land that the proposed gondola would traverse regardless of which of the alternative routes is selected.

I have lived full time in Squaw Valley for 25 years and skied here for more than 50 years. I have also hiked many of the other trails in this region.

Those of us who choose to live in a major ski resort have chosen to live in an area with many ski lifts. Ski areas build and upgrade ski lifts regularly. There are already many lifts visible to hikers when hiking the Pacific Crest Trail in the Sugar Bowl, Squaw Valley and Alpine Meadows ski resort areas. In fact, on the PCT today, you hike underneath long existing chairlifts at both Sugar Bowl and Squaw Valley.

Ski resorts occupy less than 0.1% of all the land in the Sierra Nevada mountain range and every winter are enjoyed by millions of visitors, most of whom are getting healthy exercise and having fun experiences in our beautiful mountain range. This usage dwarfs all the other visitor activities in the Sierras, yet impacts only a tiny portion of the vast mountain range.

The proposed gondola would be a wonderful addition to our little corner of the Sierra. It would eliminate the shuttle buses that presently run every 20 or 30 minutes between Squaw Valley and Alpine Meadows and are heavily used. It would greatly add to the potential enjoyment of many of the skiers at the same time it eliminates many bus and car trips on already crowded roads. I personally would opt to use the gondola frequently if it was available.

Of the alternatives, I recommend Alternative #4 mainly because Alternatives #2 and #3 have the Squaw base station so close to Cushing Pond and Squaw Valley Lodge that it would impair skier traffic, obstruct views and require reconfiguration of Cushing Pond which is presently a very attractive area.

Sincerely,

John Wilcox

0195-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0196

0196-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. The comment states that "trails will be made for ongoing maintenance." This is incorrect. All roads/trails created for project construction will be restored to pre-project conditions. Maintenance will be conducted via crews riding "maintenance carts" on the gondola cable, over snow vehicles, existing roads, and rarely, by foot or ATV.

0196-1

Date submitted (Pacific Standard Time): 6/5/2018 5:30:54 PM

First name: carolyn

Last name: willette

Organization:

Title:

Official Representative/Member Indicator:

Address1: box 5831

Address2:

City: tahoe city

State: CA

Province/Region:

Zip/Postal Code: 96145

Country: United States

Email: carolyntahoe@sbcglobal.net

Phone: 530 583 7369

Comments:

as a long time sQuaw Valley skier I believe this gondola is unnecessary and another blight on the environment. The Forest Service must act for preservation and not business interests. To say that the point of the gondola is to take the traffic off the road is laughable. It is only a marketing tool. The Granite Chief Wilderness, even if the gondola is outside of the boundary line, is home to a Forest Service "National Scenic Trail". How can we maintain a scenic trail with structures in the landscape? Is the Forest Service willing to give that up for a private business? I hope not. Towers maybe built by helicopters but trails will be made for ongoing maintenance. It will be a blight. Please watch the film "Resorting To Madness" which high lights the problems with winter resorts. The noise, the construction, the towers....please stop the madness and stick up for the environment and the local community. This is UNNECESSARY.

Thank You Carolyn Willette

0197

Date submitted (Pacific Standard Time): 5/25/2018 2:35:22 PM
First name: Marilyn
Last name: Willis
Organization:
Title:
Official Representative/Member Indicator:
Address1: 1330
Address2:
City: Alpine Meadows
State: CA
Province/Region:
Zip/Postal Code: 96146
Country: United States
Email: marilynwillis81@gmail.com
Phone: 530-320-8567
Comments:

I am writing today to vote for option 1 on the base to base gondola transport project between Alpine Meadows and Squaw Valley. I have been a full time resident of Alpine Meadows since 1989. I enjoy looking out my window and seeing the beautiful pristine backside of Squaw Valley. We moved into the Valley because of the peace and quite the Valley has afforded us in summer as well as in the winter. Putting an additional permanent structure on National Forest Service Land is definitely not desirable. I am concerned about the Alpine Meadows base terminal disrupting the creek that runs through that area, as well as the impact that will affect the 5 Lakes Trail/Granite Chief Wilderness.

Marilyn Willis

0197-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0198

Shirlee Herrington

From: Russell Wirth <russellwirth@yahoo.com>
Sent: Friday, May 18, 2018 1:47 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: R. Wirth: I Support CA Express Gondola

Dear USFS/Placer County:

0198-1

I support the California Express Gondola because this base-to-base connection will enhance the ski and snowboard experience with minimal adverse environmental impact. I've been a home owner in Truckee for the last 5 years and been enjoying various recreational activities across Yuba, Sierra, Nevada, Placer, El Dorado, Amador, Calaveras and Alpine Counties for the last 25 years.

Thank You,

Russell Wirth

Email: russellwirth@yahoo.com

Cell: 415-713-4806

0198-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Robert Yoder <ryoder@truckeeinfo.com>
Sent: Friday, May 04, 2018 7:42 AM
To: Placer County Environmental Coordination Services
Subject: Squaw to Alpine Gondola

Hi

0199-1 | I am in favor of the original alignment.

I am of the opinion the original alignment is less visually obtrusive to hikers using the Five Lakes Trail. Being closer to the ridge is less visual than being further east over the White Wolf Basin. I am also in favor of the new Rollers Chair as proposed in the Alpine Meadows master plan. The original alignment works better for servicing the Rollers Chair.

The original alignment also does not require the realignment of the Red Dog chair and new base.

Robert Yoder

12291 Prosser Dam Rd
Truckee Ca
96161

0199-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0201

Eli Ilano, Forest Supervisor Tahoe National Forest

The Granite Chief Wilderness Property Line

0201-1

Due to a significant difference of opinion on the location of the property line between the eastern border of Granite Chief Wilderness (GCW) and the “White Wolf” property, I request the Forest Service to conduct a survey of this line as a mitigation measure for an on-going situation.

The EIR draft report states on page 204, under section 4.3.2.2, that “Alternative 2 would have no effect on the undeveloped quality of National Forest System-GCW lands” This isn’t credible when the gondola and the alpine mid-station are located within a 150 feet of GCW for more than 3000 feet. Helicopters will be flying low over GCW during construction, and skiers will be off-loading in the area of the “6th Lake” which is the headwaters of Five Lakes Creek. There has already been direct impact on GCW due to the establishment of a snowcat trail in the Five Lakes area that was done primarily as pre-publicity for the gondola proposal.

The EIR describes a “temporary” construction road to be established close to the wilderness border as a part of Alternative Two. It should be noted there are a number of areas of steep terrain that would block establishment of this road. This photo shows the summit south of the easternmost lake. The White Wolf property line is near the far left edge of the photo. (All un-credited photographs were taken by David Ziegler between June, 2015 and May, 2018)



0201-1, Wilderness (W2)

A prior land survey conducted by Andregg Geomatics was used as the basis for the creation of all exhibits shown in the Draft EIS/EIR, including any exhibits that show where the temporary construction access route would be located under Alternative 2. Additionally, accurate property boundaries are now delineated on the ground. This information was reviewed in the planning of the alternatives, and in the field as a portion of this analysis. Project implementation would occur in accordance with the land survey conducted by Andregg Geomatics in 2012. No infrastructure would be constructed within the National Forest System-GCW.

As such, analysis in the Draft EIS/EIR stating that action alternatives would have no impact on the undeveloped quality of the National Forest System-GCW lands is credible and accurate. No development would occur on National Forest System-GCW lands, and therefore, the undeveloped quality of these lands would not be altered in any way.

As stated on all relevant exhibits, the temporary construction access route (as mapped in the Draft EIS/EIR) is an approximate route. It would only be established where technologically feasible (i.e., it would avoid any very steep, impassable terrain) and would not occur on any portion of the National Forest System-GCW.

The next photo shows even steeper terrain farther to the south. The left foreground is GCW land while the right side is White Wolf property.

0201-1 cont'd, Wilderness (W2)



0201-1
cont'd

Since a road in this area isn't feasible, then why was it drawn without checking this in the field? Is there any precedent for a road in this area?

The “Interconnect” Snowcat Trail

This trail was the result of a “pilot study” announced in 2011 in a press release issued by Squaw Valley on December 2, 2011. This article by Inga Aksamit is no longer online. A copy is included.

“Big news regarding backcountry access between Squaw Valley and Alpine Meadows” (Examiner.com)

“a pilot study will be conducted this winter to assess the feasibility of allowing backcountry access between Squaw Valley and Alpine Meadows. Andy Wirth, CEO of both Squaw Valley and Alpine Meadows, said, “*We will be working with closely with our partner, the United States Forest Service, to conduct the pilot study*” From the press release: “*The pilot project will include route selection, potential issues relating to backcountry access during in-bounds closures, search and rescue issues, and interface with private land and wilderness areas*”

0201

0201-1
cont'd

This led to the establishment of a snowcat trail/track that was supposed to be on White Wolf property in 2013. In addition, a number of private property signs were posted on the eastern side of this trail. Additional signs were posted in 2016.

<http://unofficialnetworks.com/2012/04/squawalpine-connect-open-time-tomorrow>
 “Troy Caldwell, the owner of White Wolf, has groomed a cat track from the saddle of KT-22 up the ridge that drops into Alpine’s Bernie’s Bowl” **“These cat tracks are within the boundaries of White Wolf”**

<http://unofficialnetworks.com/2013/01/kt22-backcountry-gate-opens-unofficial-report>
 “About 100 yards from the gate you hit a cat track that has kindly been constructed by Troy Caldwell”

<http://ski.curbed.com/2013/1/8/10287248/squaw-valley-opens-new-chapter-with-gate-to-alpine-meadows>
 “While Caldwell has hopes to eventually develop his own ski resort on the property... he did more recently give **permission for backcountry access between Squaw and Alpine through his property**”

<http://unofficialalpine.com/?p=1036>
 “A track has been groomed at the edge of the wilderness on private property that might make it easier to ski from Squaw to Alpine”

<http://unofficialalpine.com/?p=10362>
 "The entire mountain is open including the Alpine Squaw interconnect which is more of a hike from Alpine to Squaw"

<https://www.facebook.com/WhiteWolfTahoe/photos/a.269884636427277.63127.251678994914508/401252223290517/?type=3&theater>
 “it’s Squaw’s first backcountry gate and the first step towards connecting Squaw Valley and Alpine Meadows”

<https://snowbrains.com/squaw-alpine-will-connect-within-2-5-years-exclusive-interview-with-white-wolf-owner-troy-caldwell/>
 The photo at this link shows the snowcat track in 2013.

The line was surveyed the in 2012.
<http://www.moonshineink.com/news/surveying-scandal-sierra>

“In 2012, following an agreement to lease part of White Wolf to Squaw Valley for the construction of a gondola to connect the two ski areas, Truckee-based surveyor Andregg Geomatics was contracted to establish the precise boundary lines of Caldwell’s property”

0201-1 cont'd, Wilderness (W2)

0201

0201-1
cont'd

Starting with the Alpine Meadows Master Plan all of the maps released in regards to the gondola have shown the line in the same location. This line shows that White Wolf owns a limited amount of land on the west side of the crest in the Five Lakes area. However, all the photos of the snowcat trail show it on the west side of the crest. While the trail hasn't been maintained since 2016, most of the private property signs are still posted and can be used to mark the location of the trail.

The following photos attempt to show the location of the property line in relation to the signs. The first photo looks to the north in the vicinity of the easternmost lake.



The second photo looks to the south.

0201-1 cont'd, Wilderness (W2)

0201



This photo looks towards the southwest corner of White Wolf.



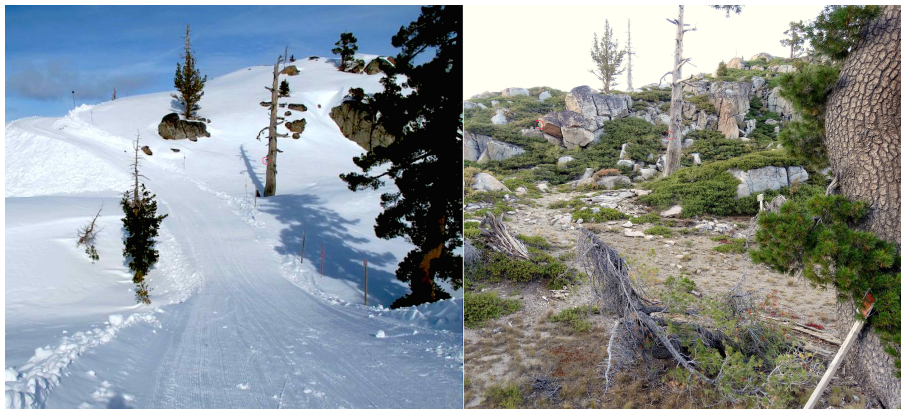
In this area, there is no White Wolf land on the west side of the crest.

0201-1
cont'd

This collage shows the banner photo from www.facebook.com/WhiteWolfTahoe/ and a photo taken nearby in the summer, and a close up of the route, which is directly over the pond at the eastern edge of the easternmost “3rd Lake. In this area, the property line appears to be at least a 100 feet to the east.



This collage shows the western area of the second photo in this comment looking to the north. White Wolf only owns the top of the summit in these photos. The photo on the left is from <http://unofficialnetworks.com/2013/01/kt22-backcountry-gate-opens-unofficial-report>



0201-1 cont'd, Wilderness (W2)

0201

0201-1
cont'd

No matter how you look at this situation, there is probable cause that the signs are in Granite Chief Wilderness. Most of the trees in the path of the Alternative Two route have been tagged. If the private property signs were located on White Wolf land, the signs would be a short distance to the west of the tagged trees, but the signs are far to the west in every case. The signs are all located on the west side of the crest, but White Wolf doesn't own much land on the west side. Areas where the construction road is proposed are very steep granite, but photos of the snowcat trail show flatter terrain etc.

The private property signs create problems in regards to right of way especially in the area of the 3rd lake. The signs leave the impression that someone can't hike around the east side of this lake without trespassing. They also have a chilling effect on the public's right to access and inspection of the gondola route in this area. It's questionable that White Wolf can restrict hikers in the designated wilderness area due to the fact that most maps show it as part of GCW and most of the private property signs in this area appear to be posted on public lands.

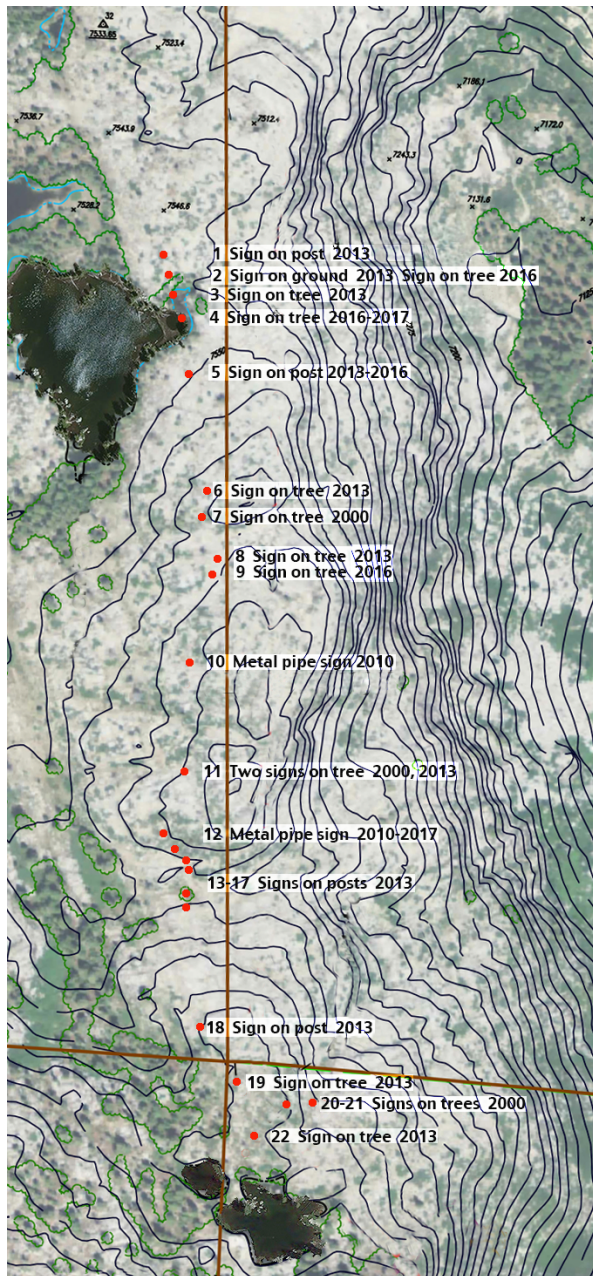
As a mitigation measure for an on-going situation in this area, I request the Forest Service survey the property line between Granite Chief Wilderness and White Wolf and take appropriate action in regards to this.

David Ziegler
130 Skylonda Dr
Woodside, CA 94062-3724

0201-1 cont'd, Wilderness (W2)

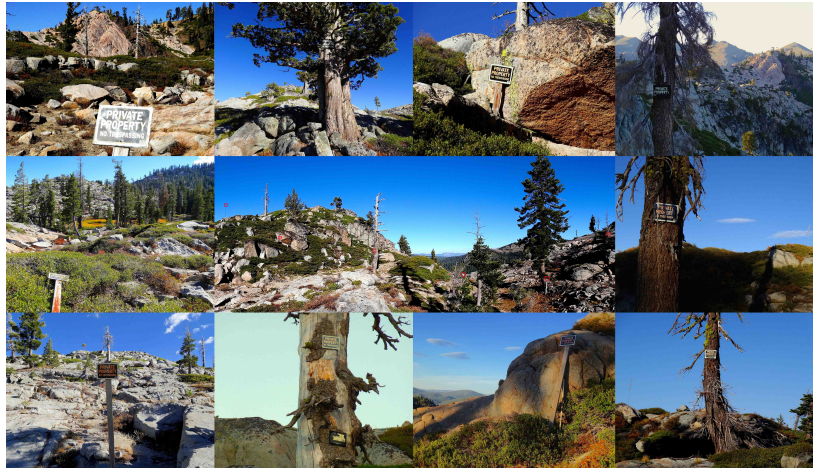
The following map shows the location of most of the private property signs in the Five Lakes area. Locations and the time frames are approximate. Most of the signs were posted in four stages:

Signs posted on trees prior to 2000
Signs fastened to metal pipes posted prior to 2010
Signs on wood posts and trees located on the eastern side of the snowcat trail in 2013
Signs posted on trees in 2016



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This collage contains most of the signs posted in the area in 2015.



<http://www.examiner.com/article/big-news-regarding-backcountry-a...>

LEISURE / TRAVEL / INTERNATIONAL TRAVEL

Big news regarding backcountry access between Squaw Valley and Alpine Meadows December 3, 2011

9:14 PM MST.

Inga Aksmait

The best thing about the merger between **Squaw Valley** and **Alpine Meadows** could be the unprecedented expansion of backcountry territory between the two mountains, already a mega-resort at over 6,000 skiable acres. Always a distant hope among backcountry enthusiasts, this might become a real possibility. According to a press release issued by Squaw Valley on December 2, 2011 a pilot study will be conducted this winter to

assess the feasibility of allowing backcountry access between Squaw Valley and Alpine Meadows.



Andy Wirth, CEO of both Squaw Valley and Alpine Meadows, said, “We will be working closely with our partner, the United States Forest Service, to conduct the pilot study. With the safety of our guests and our team members as our primary concern, we will be doing our due diligence to determine whether or not backcountry access between Squaw and Alpine Meadows is a possibility.”

The land ownership issues are complex, as Squaw Valley is privately owned while Alpine Meadows is located on National Forest Service land under a long-term lease agreement. Further complicating the issue is a large chunk of land (460 acres), known as **White Wolf Mountain**, owned by private citizen Troy Caldwell, that sits squarely between the parking lot at Alpine and the KT-22 lift at Squaw. Caldwell has been installing his own private lift in phases, under a hard-fought permit that is limited to friends and family. Many have speculated that this key lift, yet to be completed, could become part of the ski area operations, but this possibility was not addressed in the press release.

The terrain between the two mountains is rugged, but that hasn’t stopped

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skiers and boarders from pushing the limits, and the boundary lines, for years, mostly without incident but occasionally resulting in tragedy. In 2001 two teens, expert skiers who were nationally ranked, skied down from the KT-22 lift to Alpine Meadows via the West Gully and were buried in an avalanche, killing both. It was a stark reminder of the dangers of skiing in avalanche prone areas that are not controlled by bombing nor patrolled by experienced ski patrollers.

The press release indicated that if the pilot study is successful, skiers and riders with specialized backcountry training and equipment will be able to access the wilderness land connecting Squaw Valley and Alpine Meadows. This probably means that skiers and riders would need to have some kind of backcountry training and carry **specialized equipment** such as avalanche beacons, probes and shovels. The pilot project will include route selection, potential issues relating to backcountry access during in-bounds closures, search and rescue issues, and interface with private land and wilderness areas. The goal of the pilot study will be to determine whether or not feasible locations for backcountry access gates exist – and if so, where the best locations would be in terms of topography and exposure. The pilot study will start this season when conditions warrant.

In the past, backcountry policies have differed significantly between the two mountains. Squaw Valley has maintained a strict closed boundary policy, only allowing limited access to the backcountry under controlled conditions, i.e. via Big Smoothie from the Granite Chief lift a few days every spring. Many passes have been pulled from Squaw Valley skiers and riders who flaunted the policy and ducked under the ropes. In contrast, Alpine Meadows, in keeping with the National Forest Service philosophy of allowing public access on public lands, has had an **open boundary policy**, allowing skiers and boarders liberal access to unpatrolled and uncontrolled terrain. After a fresh snowfall lines of people can be seen trudging over to Beaver and Estelle Bowls and Ward Peak to experience the exhilaration of making first tracks.

This pilot project is exciting news for backcountry enthusiasts, those who want to push the boundaries a bit and fans of the first-rate terrain of both mountains. Stay tuned for more information as the pilot progresses and, hopefully results in expanded access between the two mountains. In the

0201

meantime, in this first winter of merged operations, access between the two mountains will be provided via shuttle bus.



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Examiner.com

Inga Aksamit

SF Sierra Travel Examiner

0202

Date submitted (Pacific Standard Time): 6/11/2018 4:59:36 PM

First name: David

Last name: Ziegler

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email:

Phone:

Comments:

U.S. Forest Service, Tahoe National Forest

- 0202-1 | The I urge the Forest Service and Placer County to deny the gondola proposal. All of the routes proposed are too close to Granite Chief Wilderness to make sense with any long term planning perspective. There is a high possibility of failure and obsolescence due to economic concerns, storms and high winds from the west, and public indifference. Most of these issues are ignored or glossed over in the report.
- 0202-2 | The draft makes no mention of the geographical significance of the designated wilderness area. Aside from being a popular hiking destination, the Five Lakes basin is significant due to it being the only undeveloped pass over the Sierra crest in the Tahoe area that's not fully protected. For this reason alone, the gondola should be rejected. The gondola has little support from the local community especially from Alpine Meadows residents. This is reflected in the scoping comments and most social media sites.
- 0202-3 | All of the gondola alternatives are routed over the Alpine Meadows lodge. Alternatives 3 and 4 are routed over the Alpine Meadows road, the parking lot, the pedestrian entrance, and the lodge. This is clumsy, reckless, unprecedented, and a threat to public safety.
- 0202-4 | On page 123 the report quotes the Alpine Meadows General Plan: "All aspects of the vast, unique and outstanding physical beauty of the area must be consciously and continuously preserved" The gondola plan is in direct violation of this.
- 0202-5 | Summer Use
From Page 167: "Some cabins would need to be put on the line for limited periods during the summer (less than ten times during the summer for all cars placed on the line, and three to five days per month for a limited number of cars placed on the line) in order to perform maintenance" This means the gondola would be run during the summer up to 45 days during the off-season. None of the visual simulations reflect this. This will have detrimental effect for hikers on the Five lakes trail. On Page 930 there is this scoping comment by Daniel Heagerty: "The applicant states regularly and unequivocally that the gondola would only operate during ski season"
Operation is operation. it makes no difference if it's for winter sports or maintenance. The visual simulations don't show the effect of this.
- 0202-6 | Road in the designated wilderness
From Page 195 "In fact, 1,040 feet of a low standard native surface unimproved road runs through a section of these private lands within the congressionally mapped GCW and is frequently used by the property owner; this road occupies approximately 0.25 acre of the 54.6 acres of the Caldwell property that overlap with the congressionally mapped GCW" There is no visible evidence of this. While there's a road in the area, only a short section may be located in the designated wilderness.
- 0202-7 | Gazex exploders and helicopters in Alpine Meadows
The Gazex proposals in relation to the gondola is an obvious example of runaway mission creep. When the gondola was first announced in early 2015, there were no exploders in the plan. Six months later the exploders

0202-1, Other (O2)

Impacts to the Granite Chief Wilderness area are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR. Economic concerns are not related to the physical environmental effect under CEQA and need not be included in an EIR or other CEQA analysis. Under NEPA, however, socioeconomic effects are required to be addressed, and they are in Section 4.5, "Socioeconomics and Environmental Justice," of the Draft EIS/EIR.

Wind closures of the gondola would be implemented as necessary to ensure safe operation of the gondola. Further detail on this matter is beyond the scope of this analysis, as the specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives. Public sentiment towards the project is also not an environmental impact; however, public comments have been solicited during the environmental process as required by both NEPA and CEQA and this process is summarized in Chapter 6, "Consultation and Coordination," of the Draft EIS/EIR.

0202-2, Wilderness (W2)

Portions of the Five Lakes Basin (i.e., the Five Lakes within the National Forest System-GCW) are protected by the provisions of the Wilderness Act of 1964. Considerable analysis in the Draft EIS/EIR is dedicated to discussion of the Five Lakes Basin (see Sections 4.1, "Recreation" and 4.3, "Wilderness").

0202-3, Project Description (PD)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0202-4, Visual Resources (VR)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content,

0202

analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Furthermore, the Alpine Meadows General Plan contains no concrete standards

While this language does not establish any concrete standards that must be adhered to and instead offers recommendations for maintaining the quality of visual resources at the ski resort, it makes clear that maintenance of the area's stunning visual character is a priority for the managers of Alpine Meadows.

0202-5, Visual Resources (VR)

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. They are also visible to a greater number of people traveling along the roads or from the base terminal. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be, or were required to be, simulated for the purposes of this EIS/EIR. Instead, highly frequented or prominent public areas and visually sensitive vistas were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not

0202

incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0202-6, Project Description (PD)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0202-7, Project Description (PD)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0202-7
cont'd

were added. Last year, installation for 9 more exploders in Alpine Meadows were initiated without warning. This is the result of a secret ad hoc process with no studies, reports, with no public input or notification. Because of this, the new Gazex "plan" should be considered as part of the gondola proposal.

Common sense placement of Gazex exploders should be limited to high altitude locations on developed ski slopes that are miles away from residential areas. The four exploders being currently installed are at a low altitude between 7000-7500 feet and are within a half mile of homes in Alpine Meadows.

Installation of these exploders has been done at the expense of Bear Creek residents and visitors by using a helicopter flying low over the area. I witnessed and documented two of these flights.

On 9/25/17 from about 4PM to 7PM a Skydance Helicopter N926JV flew concrete from the Alpine parking lot to the AM 4 location (on the SE Group map from Snowbrains) flying low over the Bear Creek Association residential area in possible violation of FAA and county noise regulations. There was no notification. This happened again on 5/29/18 with the same helicopter from about 10AM to 1PM. This was five days after Ron Cohen from SVSH and Troy Caldwell heard critical comments in regards to the exploders at the Placer County planning meeting first-hand. The message here is clear: The concerns of Alpine Meadows residents are to be ignored.

This is what should happen at this time:

Installation of AM Gazex 5 through 8 should stop immediately.

Helicopters should cease flying low over residential areas in Alpine Meadows unless there's an emergency.

The AM Gazex 1 through 4 should not be used again until an avalanche study is completed for Alpine Meadows. This was called for in the scoping comments by Daniel Heagerty. The study should include sonic and seismic testing of the Gazex exploders.

Gazex exploders should be removed from all gondola proposals. The only justification in regards to the gondola is stated on page 69:

"There would be risk of direct artillery and indirect shrapnel damaging new gondola infrastructure under Alternative 2 if current avalanche mitigation procedures continued in this area"

There only 3 exploders that are close enough to the Alt 2 route to be a factor in eliminating shrapnel. The rest are too far away or on a different slope.

The report admits that the Gazex exploders aren't necessary for the other routes. From page 72: "Although avalanche mitigation would not be affected by the modified location of the gondola under this alternative, Alpine Meadows nonetheless proposes?"

The reckless installation of Gazex exploders near residential areas indicates the lack of concern for the local community.

SVSH and Placer County should not be conducting an experiment into the effects of Gazex exploders in close proximity to Alpine Meadows residents.

<http://squawalpine.com/explore/blog/new-snow-safety-tools-technology>

<http://squawalpine.com/explore/blog/13-new-dragons>

<https://snowbrains.com/squaw-valley-invests-4-million-13-gazex-4-avalanchers-1-avy-helicopter-largest-ski-patrol-team-history-navy-seal-trainers/>

<https://kimkircher.com/2016/03/15/the-new-arrow-in-our-avalanche-control-quiver-gazex/>

"One Gazex explosion is the equivalent of 25 pounds of explosive in the air. Most of the explosives we use for avalanche control are 2 pounds"

The 2015 Eldora Decision

0202-8

This is in regards to the Socioeconomics and Environmental Justice section.

http://www.dailycamera.com/boulder-county-news/ci_28904349/eldora-expansion-us-forest-service

A news release from the Arapaho and Roosevelt National Forests stated. "The decision defers all expansion outside the existing ski area special-use boundaries, providing an opportunity for Eldora to work with interested parties on the more "controversial elements of the project" "I just felt like there was an opportunity for the stakeholders, the people who have an interest in Eldora ski area, to work together to come up with a refined proposal for expansion outside the existing boundary, before the Forest Service makes any decision regarding expansion," Archuleta said in an interview. Asked if there was a key factor that shaped Thursday's decision, Archuleta said, "The pivotal point was pretty simple. It was just a desire to see if there was an opportunity for some collaborative work on expansion."

http://www.dailycamera.com/news/ci_29185983/eldora-expansion-appeal-dismissed-but-ski-resort-still-has-options

0202-7 cont'd, Project Description (PD)

0202-8, Socioeconomics (S1)

It is noted that the majority of this comment references a ski area project analysis located in Boulder County, Colorado, the specifics of which are not germane to this analysis. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. Therefore, a specific response is not warranted. Section 1.6 of the Draft EIS/EIR provides a chronology and considerable detail regarding the public engagement process, which was conducted as a portion of this analysis and included opportunities for local property owners to consult and provide their thoughts on the project.

0202

0202-8
cont'd

0202-8 cont'd, Socioeconomics (S1)

Eldora's key complaint with the October ruling by the Forest Service is that while it OK'd a broad range of improvements within the resort's existing boundaries, it deferred a decision on two new high-speed lifts, one on its north side and one on the south that would necessitate boundary expansions of about 88 acres. The decision by then-acting Forest Supervisor Ron Archuleta also instructed Eldora to work "collaboratively" with its neighborhood critics to iron out issues associated with that proposed boundary adjustment. Mike Chiropoulos, a Boulder attorney representing the Middle Boulder Creek Coalition, has previously indicated a willingness to go to court to block expansion as Eldora envisions it. He welcomed dismissal of the resort's appeal. "Local governments and citizens breathe a sigh a relief over the dismissal of the appeal," he said in an email. "Regardless of where one comes down on expansion, nobody wants out-of-state corporations or big-city lawyers to have final say over what happens to our wildlife, watersheds, wilderness and communities." "The Forest Service decision was intended to balance a healthy environment with a healthy ski area," Chiropoulos said. "It made it clear that the path forward depends on collaboration. The resort's response speaks for itself."

http://www.dailycamera.com/opinion/ci_29219592/editorial:-eldora-must-work-for-what-it-wants

"Essentially, the federal agency said it wasn't going to play arbitrator to parties who have had little if any substantive discussion among themselves. The ski area, we think it fair to say, has done a poor job of outreach going back years, although it did hold a series of public meetings in putting together the expansion plan. As a result of the historic neglect, it has limited residual support and a fair amount of latent hostility from some area communities and environmental organizations. The agency's October decision contradicted the earlier draft, deferring the expansion and urging the parties to get together and work out their differences. The ski area's all-or-nothing position on improvements is untenable, unnecessary and, frankly, a flashback to the imperious attitude that left it with so little community goodwill in the first place"

<http://www.5280.com/travelandoutdoors/magazine/2014/10/expanding-interests> Eldora is notorious for "wind hold" situations that can shut down lift access to more than half the mountain. Spent says the proposed Placer chair wouldn't be as affected by high winds, but a planned wind-speed study by the Forest Service was never done. Marcia Gilles, spokesperson for the Forest Service, says the Forest Service determined the study wasn't necessary, but it reserves the right to change its mind if expert reviews of the DEIS or public comments suggest otherwise. The Eldora DEIS was written by the SE Group, a development consulting firm that specializes in resort communities, which also wrote Eldora's 2011 master plan. Gilles says federal regulations expressly permit contractors to work for both sides. The DEIS says SE Group filed a disclosure stating it has no stake in the outcome of the project, and "no conflict of interest exists."

This decision sets precedent in this situation because the gondola plan has been imposed on the Alpine Meadows community with little public consultation from local property owners. An indication that SVSH has no interest in input or dialogue is their repeated use of "inevitability" rhetoric in regards to the gondola. This includes statements from Andy Wirth and employees, (tram operators) a banner on an example gondola car in front of the tram, (Coming Soon) and numerous statements in on their website, Squaw Magazine and social media. The Forest Service and Placer County should heed these words of warning from Andy Wirth: "Our industry is littered with lifts that shouldn't be there" There's no better example of this than the Squaw-Alpine gondola.

David Ziegler
130 Skylonda Dr
Woodside, CA 94062-3724

COUNTY OF PLACER
PLANNING COMMISSION
MEETING

REPORTER'S TRANSCRIPT OF PROCEEDINGS

ITEM 1

SQUAW VALLEY / ALPINE MEADOWS BASE-TO-BASE
GONDOLA DRAFT ENVIRONMENTAL IMPACT
STATEMENT / ENVIRONMENTAL IMPACT REPORT
PUBLIC REVIEW AND COMMENT

THURSDAY, MAY 24, 2018

10:00 A.M.

NORTH TAHOE EVENT CENTER
8313 NORTH LAKE BOULEVARD
KINGS BEACH, CALIFORNIA

Reported by: Kathryn S. Swank, CSR 13061, RPR

0138

Public Meeting

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3	PLANNING COMMISSION
4	Wayne Nader, Chairman
5	Anders Hauge
6	Richard Johnson
7	Jeffrey Moss
8	Richard Roccucci
9	Larry Sevison
10	
11	COUNTY STAFF
12	Heather Beckman
13	Leigh Chavez
14	Sue Colbert
15	Stephanie Holloway
16	E.J. Ivaldi
17	Karen Schwab
18	
19	OTHERS IN ATTENDANCE
20	Eli Ilano, Tahoe National Forest Service
21	
22	
23	
24	
25	

Golden State Reporting & Video Services (866) 324-4727

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2	PUBLIC PARTICIPANTS
3	Mark Calhoun
4	Ron Cohen
5	Mary Coolidge
6	Craig Hamilton
7	Greg Parrott
8	Chase Schweitzer
9	Jeff Shellito
10	Melissa Siig
11	Ellie Waller
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Public Meeting

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9	Adjournment	54
10	Reporter's Certificate	55
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1 Thursday, May 24, 2018, 10:10 a.m.

2 Kings Beach, California

3 ---o0o---

4 (Previous items were held but not
5 reported by the Certified Shorthand
6 Reporter.)

7 ---o0o---

8 CHAIRPERSON NADER: Now we'll move to our first
9 item. As I have said, just again, if you want to
10 speak -- I didn't see anybody jump up, so I'm assuming
11 that everybody who would like to speak on this item
12 later has already signed up, so that's good.

13 So we'll move on.

14 Heather?

15 MS. BECKMAN: Thank you. Good morning. I'm
16 Heather Beckman. I'm a senior planner with the Planning
17 Services Division up here in Tahoe City.

18 And I'm here today to introduce the Squaw
19 Valley/Alpine Meadows base-to-base gondola project to
20 you.

21 The Draft EIS/EIR is out to the public; it's in
22 the 45-day comment period. And so we're here today to
23 receive oral comment on the document.

24 Before I get into the project itself, I would
25 like to point out that because the project site crosses

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1 both private lands, which require the state CEQA
2 environmental review process, and federal lands managed
3 by the Forest Service, which require the NEPA
4 environmental review process -- because of the dual
5 processes, early on, the County and the Forest Service
6 decided to partner and issue a joint EIS/EIR to serve
7 our environmental review needs.

8 So on this slide, I would just like to briefly
9 walk through the decision makers and the project team.

10 So when we get to the Final EIS/EIR, I will be
11 coming back to your Planning Commission, and you will be
12 a recommending body on the adequacy of the environmental
13 document, as well as the entitlements. The Board of
14 Supervisors are ultimately the decision maker for this
15 project in terms of the CEQA and the entitlements.

16 On the Forest Service side of things: Mr. Eli
17 Ilano, who is seated at the table over here. He's the
18 Tahoe National Forest supervisor, and he's the sole
19 decision maker from the NEPA side of things. So he's
20 here today, much like your commission, to hear the oral
21 public comment on the document.

22 I also have other Forest Service staff with me
23 here today: So I have Joanne Roubique sitting in the
24 front row; she's the Truckee district ranger. I have
25 Joe Flannery; he is the winter sports specialist and

1 he's my counterpart in processing this document.

2 I also have some of our consultants here. So
3 from the EIR consultant team, with Ascent Environmental,
4 I have Sean Bechta; and then not listed on the slide is
5 Gary Jacobs.

6 And then from the EIS consultant team, SE
7 Group, I have Will Hollo.

8 So as is required by both NEPA and CEQA, when
9 we release the draft environmental document, we have to
10 notify the public of its availability and the comment
11 period. So we did the typical noticing for this
12 project, so property owners within 300 feet. We placed
13 notices in various newspapers, including the "Truckee
14 Sun," any persons or organizations who previously asked
15 to be notified were done so, as well as state, federal,
16 local agencies and jurisdictions.

17 This slide is just to give you -- to orient you
18 as to where the project is located. So, again, it's the
19 Squaw Valley and Alpine Meadows Ski Resorts. And the
20 gondola crosses the ridgeline between the resorts. The
21 project area is located southwest of the town of Truckee
22 and west of Tahoe City.

23 So on this slide, I would like to briefly go
24 through the entitlements as it relates to the Placer
25 County process.

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1 This project will require a General Plan
2 Amendment to the Squaw Valley General Plan, and,
3 essentially, it's just to add that lift line alignment
4 to the potential future ski lifts map, which is a map
5 that's in the General Plan.

6 There's also a requirement for a small rezone
7 at the Alpine Meadows base area. And so I would like to
8 walk you through the zoning on this figure.

9 So starting at the top of the figure, in Squaw
10 Valley, we're in Forest Recreation Zoning District.
11 Then as we work our way up to the ridgeline, we -- in
12 the brown, we get into the open space. And ski
13 facilities are allowed, by right, in both forest
14 recreation and the open space.

15 When we get to the alpine terminal, in this
16 light yellow polygon, that's what's zoned neighborhood
17 commercial. Neighborhood commercial is really intended
18 to support the base facilities and amenities to the
19 lodge, the restaurant, the retail. So we're seeking a
20 small shift, if you will, in boundary between
21 neighborhood commercial and open space to allow for the
22 proposed terminal.

23 So in terms of the project, what does it do?
24 So as stated by the applicant, one of the project goals,
25 one of the main goals, is to provide for aerial

1 transportation between the two resorts. So the gondola
2 would operate in the wintertime, or ski season, only.
3 And when it is operating, the current shuttle bus that
4 runs between the two resorts would not operate.

5 Each gondola cabin can hold up to eight people.
6 The gondola itself could transport 1400 people per hour
7 in each direction, and the travel time is about 16
8 minutes.

9 In addition to the gondola, below the Alpine
10 Meadows Mid-Station, these blue triangles you see are
11 eight Gazex avalanche exploders. So this area is
12 already part of Alpine's Avalanche Mitigation Program.
13 They are proposing an upgrade to those exploders. They
14 use a combination of propane and oxygen gas, which can
15 be remotely ignited, resulting in a concussive blow,
16 which triggers the avalanche.

17 So here, I just wanted to show you some
18 examples of what the infrastructure might look like. So
19 on the top photo -- my pointer is not working. There it
20 is. Top photo: That's an example terminal. So it has
21 a 24- by 84-foot footprint. It's about 30 feet tall.

22 I show you this -- the colors and materials of
23 the terminals have yet to be determined. If this
24 project were approved those -- the colors, materials,
25 the look and feel, would be further vetted and reviewed

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1 through the Forest Service and Placer County Design
2 Review Process. But this gives you an example of the
3 size, mass, and height of the terminal.

4 And then the bottom photo is just an example of
5 a lift tower.

6 And then here are some examples of what the
7 Gazex exploders look like. So on the left-hand side,
8 this is where the actual gas would be ignited and the
9 concussive blow would come from, and these shelters
10 actually house the gas.

11 So now I would like to get into the actual
12 proposed project alignment and gondola alignment.

13 The proposed action or alignment from the --
14 provided by the applicant is referred to as Alternative
15 2.

16 We do have an Alternative 1; both CEQA and NEPA
17 require that no action or no project alternative be
18 analyzed. So that is our Alternative 1.

19 Alternative 2, again, is what's proposed by the
20 applicant. So I would like to walk you through where
21 the infrastructure would be located.

22 So, again, at the top of the figure, in Squaw
23 Valley, there's a terminal proposed to be located
24 between Lake Cushing and the KT Sundeck, and this is on
25 private lands owned by Squaw Valley Ski Holdings.

1 As we move up the gondola alignment, we get to
2 the Squaw Valley Mid-Station, and that's located in the
3 KT Saddle or near Skunk Rock. We're still on private
4 lands here, but we have now entered private lands owned
5 by Mr. Troy Caldwell. The gondola then traverses along
6 the ridgeline to the Alpine Meadows Mid-Station, and
7 that's where we enter Forest Service lands. And then
8 down from Alpine Meadows Mid-Station into the alpine
9 base area, still in Forest Service lands there.

10 I do want to point out that the gondola does
11 not open any new terrain. It provides better access to
12 existing terrain.

13 So specifically, the gondola is intended to
14 operate in a segmented fashion. So, for example, if the
15 whole gondola were on wind or weather hold, the
16 segments -- so Squaw -- Squaw terminal to Squaw
17 Mid-Station/Alpine Terminal to Alpine Mid-Station, they
18 can run independent of each other and of the whole
19 gondola. So they can essentially act as their own ski
20 lift. And in Alternative 2, skiers can load and unload
21 at these mid-stations.

22 So now I would like to talk about how our
23 alternatives were developed, and I will show you the
24 alternatives on the next slide. Both CEQA and NEPA
25 require that we study a range of alternatives. For

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1 CEQA, we're really looking at a range of alternatives
2 that achieve the project goals, as well as to minimize
3 or lessen environmental impacts.

4 From the NEPA side of things, the alternatives
5 are really driven by comments we received during the
6 scoping process. So, as you know, when a project
7 application comes in, the agencies enter a formal
8 scoping process where we present the project to the
9 public and we solicit their feedback and their comments.

10 And when we went to scoping for this project,
11 three key areas emerged that helped us formulate what
12 our alternative alignments would look like.

13 So the first was proximity to Granite Chief
14 Wilderness. So what you see on the left-hand side, here
15 in dark green, are the federally designated and
16 protected Granite Chief Wilderness area. So it's where
17 the Five Lakes are that you may be familiar with. So
18 this is a very special land designation. These lands
19 are meant to be kept in their natural and pristine
20 state, and very little to no development may occur. So
21 the concern was the near proximity of Alternative 2 to
22 the wilderness area.

23 Secondly was the issue of the state and
24 federally threatened and endangered Sierra Nevada yellow
25 legged frog. Shortly before this application was

1 submitted, the frog was listed as a species. So we knew
2 there was a concern and we knew it was in the region
3 generally, but did not know where specifically, nor did
4 we know the critical habitat mapping.

5 About a year after the applicant submitted
6 their application in this alignment, the U.S. Fish and
7 Wildlife Service released their critical habitat
8 mapping, and we found that Alternative 2 is fully within
9 the frog critical habitat.

10 Furthermore, during our initial field studies,
11 we found, in Bartstool Lake, so a lake adjacent to the
12 Alpine Meadows Mid-Station, a frog was actually found,
13 so then we also occupied habitat.

14 And then, finally, there was a concern about
15 the visual impact. The gondola alignment traverses
16 quite a length of ridgeline between the two resorts and,
17 therefore, has -- is highly visible, both from Granite
18 Chief Wilderness, as well as other viewing points and
19 roadways in the area.

20 So with those comments and those three topical
21 areas in mind, the Forest Service and County developed
22 two action alternatives to analyze; so Alternatives 3
23 and 4.

24 And I do want to point out something unique
25 about this project as it relates to CEQA practitioners.

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1 The NEPA process requires that all alternatives have an
2 equal level of analysis. So in this case, Alternatives
3 2, 3, and 4 have been designed, engineered, field
4 studies conducts, and the data analyzed to an equal
5 level. So that means, our decision makers can approve,
6 condition, or deny any of the three alternatives.

7 As you know, what we typically see in CEQA,
8 only the proposed alternative -- in this case,
9 Alternative 2 -- has the full level of analysis and the
10 other alternatives have a lesser degree of analysis.

11 So I think that's a really unique opportunity
12 that we have for our decision makers in this project.

13 So what do our alternatives do to address some
14 of the environmental impacts? As you see -- so
15 alternative -- I really am just having a hard time with
16 this pointer.

17 Alternative 3 starts in the same area --
18 terminal location as Alternative 2, same mid-station
19 then moves eastward, more interior, into the Caldwell
20 property, and down into Alpine Meadows.

21 Alternative 4 has a different term base station
22 in Squaw Valley, different Squaw mid-station, and then,
23 again, down into Alpine Meadows.

24 So Alternatives 3 and 4 move farther east, so
25 they are farther away from the Granite Chief Wilderness.

1 They are more to the periphery of the frog critical
2 habitat. They are farther away from the occupied
3 habitat. And in both cases, for Alternatives 3 and 4,
4 they actually dive down into what we refer to as Catch
5 Valley. So it's a valley more interior on the Caldwell
6 property. And because it's in that valley, it's less
7 visible from Granite Chief Wilderness and the topography
8 just blocks the visibility of these alignments more so
9 than we see in Alternative 2.

10 So part of our CEQA analysis at the Draft EIR
11 level, we are required to identify an environmentally
12 superior alternative, so the alternative with the least
13 collective amount of impacts.

14 In this case, Alternative 1, the no action, no
15 project alternative, had the least environmental
16 impacts; there were no environmental impacts.

17 So then CEQA requires that we identify the
18 environmentally superior alternative amongst the action
19 alternative. So alternatives 2, 3, and 4 in this case.

20 So what our analysis found is that Alternative
21 2 actually has the greatest impact, again, due to
22 proximity to wilderness, the visual of the frog.
23 Alternatives 3 and 4 have less of an impact. And
24 although they were very close to one another,
25 Alternative 4 came out as the superior alternative.

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1 So before I get into discussion of the
2 environmental impacts I want to give a little bit more
3 context about the project, specifically as it relates to
4 skier visitation. When this project came in, the
5 project team -- the County, the Forest Service, our
6 consultants -- we immediately asked the question, does
7 this gondola service an attraction, drawing more skiers
8 to the resorts? Or is it an amenity? Is it simply that
9 aerial bus transportation between the resorts? And we
10 found that it's both, but it's more so the amenity or
11 transportation, so I will walk you through that.

12 First, however, I would like to define what a
13 skier visit. So if I were to ski ten times in one
14 season, that would constitute ten skier visits. And
15 what the regional and national ski industry data has
16 seen is that, over the last 20 years, the skier visit
17 market hasn't changed; it's remained static. And that's
18 nationally -- regionally and nationally.

19 So resorts, they are really vying to maintain
20 their market share or, if possible, to grow it a little.

21 And so then, that begs the question, what
22 drives the skier visits? How are we getting people on
23 the mountain?

24 And so, again, after decades and decades and
25 decades of ski industry analysis and resort operations,

1 what the industry has found that, first and foremost,
2 what gets skiers to the mountains is the snow
3 conditions. So the better or the more the snow, the
4 more skiers we're seeing.

5 Secondary, even tertiary to that, we're seeing
6 that it's resort capacity. So what kind of terrain do
7 they have? What kind of lifts do they have? What
8 amenities, restaurants, retail? What are the ticket
9 pricings and accommodations? Those also feed into skier
10 visits but to a lesser degree.

11 And then it's also the capital improvement
12 projects. So when a resort installs a new lift, a new
13 terrain park, or a new gondola, there is often a market
14 curiosity factor. And is a skier says, oh, gosh, I want
15 to try that out and see what that can offer for me. And
16 so what the industry has found, that with a new capital
17 improvement, they will often see a little bump in skier
18 visitation. It tends to flatten and then decline pretty
19 rapidly thereafter.

20 So we did commission a Skier Visitation
21 Analysis for the gondola project. We used several
22 experts in the industry. They analyzed the last ten
23 years of skier visitation data at both Squaw and Alpine
24 to establish a baseline. They also compared our
25 projects to other projects nationally and regionally to

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1 see if there might be some sort of correlation.

2 But, ultimately, what they determined was that
3 we -- with the implementation of the gondola, there will
4 be a nominal increase in skier visits, so about a 1.4
5 percent increase in the first year. And that would
6 result in 12,400 skier visits in the first year after
7 construction.

8 Then we would see the diminishing returns, as
9 we expect. By the end of year five, there would be a
10 zero percent increase. And adding all the skier --
11 additional skier visits by the end of year five, it
12 would be a grand total of 36,856 skier visits, added up,
13 aggregated over those five years.

14 So I would like to translate what this means
15 into a traffic impact, because not only do we analyze
16 traffic, but that also informs other environmental
17 impact areas we look at.

18 So these -- the increase in skier visits, on a
19 busier Saturday, it could result in an approximate 422
20 increase in terms of daily vehicle trips. So 211 trips
21 are coming into the resorts in the morning 211 going out
22 in the afternoon. A busier Sunday, we might see 432
23 trips; and, again, half in the morning, half out in the
24 afternoon.

25 So now I just want to touch on the use of

1 resource protection measures. It's a little bit new
2 nomenclature for the County CEQA documents. You can see
3 that these resource protection measures, or RPMs,
4 essentially, they are county mitigation measures; they
5 are one and the same.

6 As part of Tahoe National Forest NEPA process,
7 they use resource protection measures, or RPMs. They
8 are front-loaded into the project description. All of
9 the RPMs will be -- will become County CEQA mitigation
10 measures. So essentially, they are the typical
11 construction and operation requirements you would expect
12 on any project, and the intent is to avoid or minimize
13 environmental impact.

14 So construction RPMs would be requirements for
15 erosion control measures, requirements for improvement
16 plans; and in the case of this project, constructing in
17 one season.

18 On the operational side of things, it would be
19 the requirements to operate in the wintertime only. We
20 have hours that the gondola can operate, and we also
21 have information that determines who, what, how, and
22 when people can load and unload from the mid-stations.

23 So now I would like to get into the
24 environmental impact. So as you know, in the CEQA
25 process, we have to look at, when the project is

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1 implemented, will it have an impact on the environment?
2 And if so, does it cross a certain threshold to be
3 determined significant?

4 So the left-hand column are those impact areas
5 that we studied. We studied 17 in total. The left hand
6 column are those areas that were determined to have a
7 less than significant impact even before the
8 implementation of RPM and mitigations. So that's true
9 for air quality, greenhouse gases, utilities, public
10 safety, recreation, and botany.

11 The right-hand column are those areas that with
12 implementation of the project, we saw that there might
13 be a significant or potentially significant impact. We
14 then applied the RPMs and mitigation measures, and the
15 impact was reduced to less than significant. So that
16 was the case for land use vegetation, wildlife aquatics,
17 wetlands, geology, and soils.

18 There were three areas where there were
19 significant and unavoidable impacts. So that means, we
20 applied the RPMs and mitigation measures, and the
21 impacts were still significant and, therefore,
22 unavoidable. And that was the case for visual
23 resources, noise, transportation, and circulation.

24 And so I would like to get into those three
25 areas in my next few slides.

1 So for visual resources, the impact area of
2 concern was visual character. So the visual character
3 is, really, what's the lay of the land of the project
4 site today? And so, for the gondola, we actually have
5 two visual character areas: So one are the developed
6 areas, where we see the base lodges and ski
7 infrastructure today. We install the gondola there.
8 And it's what we might expect to see and there would be
9 no contrast to the existing visual character.

10 The other visual character we have on our
11 project site are the exposed and undeveloped ridgelines
12 and the sparsely vegetated hill slopes. Installing the
13 gondola in those areas would be a contrast to what we
14 see today, a contrast to the visual character.

15 The mitigation measures we would apply, the
16 Placer County and the Forest Service both have design
17 review processes. Through these processes, we look at
18 the colors, materials, lighting, reflectivity of the
19 infrastructure. And we would be looking to have them
20 blend with the natural environment as much as possible.
21 In some cases, there might be screening, landscaping
22 requirements to revegetate disturbed areas. But despite
23 those mitigation measures, there would still be a
24 significant and unavoidable impact.

25 The table on the bottom of the slide gives you

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1 a comparison amongst the three alternatives in terms of
2 the ranking of the impact. So Alternative 2, because
3 it's closest to the wilderness area, and because it has
4 the greatest length traversing across the ridgeline,
5 would have the greatest visual impact and contrast to
6 the visual character.

7 Alternatives 3 and 4, as you may recall, dive
8 down into Catch Valley. So because of the topographic
9 shielding of the gondola, there's less of an impact.
10 Alternative 3 goes lowest in Catch Valley; has the least
11 amount of impact. Alternative 4, slightly higher in the
12 valley; slightly higher impact than Alternative 3.

13 So as it relates to noise, the impact area
14 relates to construction noise. So general construction
15 noise might be what you would expect: Heavy equipment,
16 grading, construction crews. And for this project,
17 there's a possibility for blasting to install some of
18 the lift towers and the avalanche equipment.

19 So our typical mitigation measures could reduce
20 those items to a less than significant level. So our
21 mitigation: This project will be constructed in one
22 season so the noise impacts are relatively temporary in
23 nature. We have limits on construction days; time of
24 day; we require muffling devices; we require blasting
25 plans. And that would reduce our typical noise to a

1 less than significant.

2 What's different about this project, however,
3 is the use of helicopters to fly in the infrastructure
4 to the remote areas. So they will be flying in lift
5 towers, the avalanche equipment, the mid-stations.
6 Helicopters would be used up to 20 days, and it would be
7 in both valleys and across the ridgeline. And that was
8 what was determined to be significant and unavoidable.

9 Again, for the ranking, Alternative 2 has the
10 greatest impact to Granite Chief Wilderness because of
11 proximity. The Alternative 2 -- Alternative 2 terminal
12 is located near the Squaw Valley Lodge residences, so
13 the greatest impact there.

14 Alternative 3, slightly farther from the
15 wilderness, so slightly less impact. Same location at
16 the Squaw Terminal next to the Squaw Valley Lodge, so
17 same impact there.

18 And then the Alpine Meadows Mid-Station, for
19 Alternative 3, is located relatively close to the
20 existing residence on the Caldwell property, so also an
21 impact there.

22 Alternative 4 had the least impact. It's
23 farthest away from the wilderness. Its Squaw Terminal
24 is located in an entirely different area and not as
25 close or in proximity to residences. And although

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1 Alternative 4 Alpine Mid-Station is also located near
2 the Caldwell residence, it's somewhere farther away than
3 Alternative 3.

4 So now I would like to get into the final
5 impact area of transportation and circulation. There
6 were four impacts in here, all of which were in the
7 Caltrans rights of way.

8 Two things I want to point out before I discuss
9 the impact is, number 1, it doesn't matter which
10 alternative is chosen, whether it's 2, 3, or 4. They
11 all have the same impacts as it relates to
12 transportation and circulation on our roadways.

13 And then, secondly, I just want to remind you
14 that the skier visitation, that small -- that increase
15 in skier visitation results in a increase in the
16 traffic. So, again, busier Saturday would be 422
17 vehicle trips, half in, half out; and a busier Sunday
18 would be 432 trips.

19 So the first impact of the project would have
20 an increased and unacceptable queue length while heading
21 northbound on State Route 89 and turning left on to
22 Alpine Meadows Road. That would be during the Saturday
23 a.m. peak hour.

24 The mitigation for that would be to coordinate
25 with Caltrans to increase the green time at that signal.

1 And by doing so, that would actually reduce -- has the
2 possibility to reduce this to a less than significant
3 impact.

4 Caltrans has verbally told us that they are
5 amenable to doing that, but until that actually goes
6 into effect, we have to consider it significant and
7 unavoidable.

8 So these next three impacts are all in the
9 cumulative sense. So that means, implementation of the
10 gondola project and all reasonably foreseeable projects.
11 So, for example, that could include the Village at Squaw
12 Valley Specific Plan, Alpine Sierra Subdivision, or even
13 the Cold Stream Subdivision Project in the town of
14 Truckee.

15 So in the cumulative sense, there are two
16 Caltrans intersections that are already at an
17 unacceptable level, that would worsen at the Sunday p.m.
18 peak hour. So that roundabout I-80/State Route 89
19 roundabout in Truckee, going eastbound, would have an
20 increased delay of about nine seconds. The State Route
21 89/Squaw Valley Road intersection at the Sunday p.m.
22 peak would have about a 23-second delay as well.

23 Again, getting back to queuing at
24 intersections, so that same queuing point heading north
25 on State Route 89, turning left into Alpine Meadows,

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1 that queuing length would worsen to beyond an acceptable
2 threshold during the Saturday a.m. peak hours. So both
3 project and cumulative scenario.

4 And then, finally, the Caltrans road segment on
5 the Sunday p.m. peak hour, that segment on State Route
6 89 between Squaw Valley Road, heading north, to Truckee,
7 at West River Road; there would be increased traffic
8 there. Although it's not decreasing the level of
9 service to a significant level, it is increasing the
10 volume-to-capacity ratio, which is essentially the
11 number of cars compared to the capacity of the road. So
12 that increases beyond an acceptable level.

13 The mitigation for all those three impacts are
14 the same: It would be to comply with the Placer County
15 Trip Reduction Ordinance. As part of that, there's a
16 transportation demand strategy. And so, really, we're
17 looking for the applicant to implement strategies that
18 would somehow lessen or discourage the traffic during
19 those -- those difficult times.

20 And so examples could be that the resorts could
21 provide a complementary offsite park-and-ride shuttle to
22 get skiers to and from the resorts; membership in the
23 Truckee North Tahoe Transportation Management
24 Association; or the resorts could offer up things like
25 entertainment or meal specials that keep people at the

1 resorts a little bit longer in those afternoon hours and
2 disburse the time over which they depart.

3 So now I would like to get into the CEQA/NEPA
4 process on our next steps. So right now, we're at the
5 Draft EIS/EIR 45-day comment period. Once we receive
6 the comments, the Forest Service and the County and our
7 consultants will jointly address them and formally
8 respond to them in the Final EIS/EIR. Once we release
9 the final document, that's when our processes diverge.

10 So, again, we have two entirely separate
11 environmental reviews, two entirely separate approvals.

12 And because we have the equal level analysis
13 for Alternatives 2, 3, or 4, our decision makers can
14 approve, condition, or deny any of the alternatives.

15 So from the County CEQA side of things, after
16 the Final EIS/EIR is released, I will be going back to
17 Squaw Valley MAC and NTRAC for the recommendation on the
18 entitlements. I'll be coming back to your Planning
19 Commission for your recommendation on the adequacy of
20 the environment document and your recommendation on the
21 entitlements.

22 The Board of Supervisors are the final approval
23 here. I will be asking for certification of the EIR,
24 and the entitlements include, again, the General Plan
25 Amendment at Squaw Valley General Plan to add that

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1 line -- the gondola line to the lift mill; that rezone
2 at Alpine Meadows Base, so, again, that small adjustment
3 between neighborhood commercial and open space zoning to
4 allow for that terminal; and then a Conditional Use
5 permit is required for the ski facilities.

6 On the NEPA side of things, Mr. Eli Ilano, the
7 Tahoe National Forest supervisor, is the decision maker.
8 After the Final EIS/EIR is released, either concurrent
9 or shortly sometime after that, will be the release of a
10 Draft Record of Decision, or Draft ROD.

11 And that's essentially the preliminary decision
12 of what alternative to approve, condition, or deny.
13 When that Draft ROD is released, that initiates a new
14 45-day predecision objection period on that draft ROD.

15 So any person who commented during our Draft
16 EIS/EIR today, in our 45-day comment period that we're
17 going through right now, any person who commented and
18 initiates legal standing -- and I will explain what that
19 means in my next slide. But any person who has legal
20 standing may object on the Draft ROD in that 45-day
21 period.

22 After the 45-day predecision objection period
23 closes, the Forest Service will review if there were any
24 objections. They are required to reach out to the
25 objectioner. They may or may not meet; they may or may

1 not come to some sort of a resolution. Then, after
2 that, the Final ROD is issued. It may be the same,
3 similar, or different from the Draft ROD.

4 We -- as you can see, there are a lot of steps
5 in here, in our different processes and two different
6 decisions that may occur. So the County and Forest
7 Service are currently in dialogue right now just
8 figuring out our sequencing and timing of how we'll make
9 this work together.

10 And then, so for my last slide, I would like to
11 speak to public comment. So right now, we are in the
12 45-day public comment period. Written comment closes at
13 5:00 p.m. on June 11th. A comment -- the commenter only
14 has to provide their comment to one agency, the County
15 or the Forest Service. We share them equally, and we'll
16 be responding to them equally in the Final EIS/EIR. We
17 have e-mail addresses and mailing addresses for your
18 comments here.

19 And now I would like to speak to the legal
20 standing.

21 So in order to have legal standing for the
22 Forest Service to object on the Draft Record of
23 Decision, three things are required: Your full name,
24 your postal address, and the comment must be topical.
25 So for example, if a comment simply said, "I hate ski

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1 resorts," that wouldn't be considered topical. It must
2 speak to the project itself, maybe speak to visual or
3 wildlife or what concerns the commenter may have.

4 So as part of that, to help establish any oral
5 commenters today -- to help them establish legal
6 standing, that's why we have the sign-up sheet that has
7 the name and postal address for it. And then the
8 comment is being recorded by a court reporter. And so
9 with those three things, the legal standing should be
10 established.

11 So with that, I'm happy to answer any
12 clarifying questions.

13 CHAIRPERSON NADER: Any questions for Heather?

14 Thank you, Heather. Appreciate it.

15 MR. SEVISON: She did a good job.

16 CHAIRPERSON NADER: Before we start, open it up
17 for the public comment, I want -- I would like to go
18 again -- I want to kind of emphasize some things that
19 Heather already stated, is that you need to sign up.
20 You need to have your address as well, so that we can
21 respond back to you, either the Forest Service or the
22 County. And so if you have not signed up to speak -- we
23 will call you up as we -- as we go through the list. So
24 you haven't signed up, please do that now.

25 And as I mentioned earlier, it will be three

1 minutes for your comments. And as Heather said, it
2 needs to be topical, which today's topic is just the
3 adequacy of the EIS/EIR. And this is not the time to
4 talk about the merits of the project. That will come
5 back before the commission, when you will have time to
6 make your comments related to the merits of it, probably
7 later this summer.

8 So I would ask that you keep your topic
9 specific to what our request is today and it relates to
10 this. And then -- not just how you feel about ski
11 resorts, as was mentioned.

12 So if you tend to wander off and start dealing
13 with the merits, I will very graciously ask you to step
14 back and get more focused on the particular issue of
15 the, again, the EIS or the EIR.

16 And as you speak, if you -- as you are going to
17 be called up by name, I would like you to state your
18 name again and to speak clearly. As was mentioned, we
19 have a court reporter here, and she's going to be
20 hanging on every word that you say. So we need to make
21 sure that she can understand what you are saying. So
22 appreciate that.

23 So I will open it up, and E.J. is going to call
24 people up as we start.

25 Did I miss anything that I needed to state,

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1 Karen, before -- County Counsel, before we start? Okay.

2 Thank you.

3 MR. IVALDI: So Chairman, right now -- the
4 first list. I just have five commenters I see. Others
5 comment -- or are signing up right now. So I will grab
6 that list when they are done. So what I will do is, I
7 will call three names up and just go in order, just so
8 you have time to prepare.

9 But the first names are -- and please forgive
10 me ahead of time if I don't pronounce your name
11 correctly. First name is Chase Schweitzer; then Ellie
12 Waller; and then Greg Parrott.

13 CHAIRPERSON NADER: And again, you will have --
14 you will see a green light; and then when it comes to
15 yellow, you have a minute to wrap up; and then when it's
16 red, I would ask that you conclude your comments.

17 Thank you.

18 MR. SCHWEITZER: Good morning, Placer County
19 Planning Commission. I am Sierra Watch field manager
20 Chase Schweitzer representing Sierra Watch. I ask for
21 the five minutes that's allotted for groups, if that's
22 all right?

23 CHAIRPERSON NADER: Okay. Five minutes.

24 MR. SCHWEITZER: We appreciate you accepting
25 verbal comments at a meeting up here in Eastern Placer

0138-1

1 County for the proposed gondola between Squaw Valley and
 2 Alpine Meadows, put forth by KSL Capital Partners
 3 Subsidiary, Squaw Valley Ski Holdings, now also part of
 4 the Alterra Mountain Company.

5 The land in question is special. It's home for
 6 a popular hiking trail, incredible scenic vistas, and
 7 endangered species. It's also marked by our nation's
 8 strongest commitment to preservation, a national
 9 wilderness designation. This decision you make about
 10 this land is important and will last for generations.

11 Sierra Watch has retained experts in biology,
 12 planning, and traffic to help us understand what this
 13 project would mean for these invaluable resources, and
 14 we look forward to sharing the conclusions of that
 15 analysis in a comprehensive written comment.

16 Today, I want to focus your attention on three
 17 areas of utmost importance: Wilderness values, wildlife
 18 and endangered species, and the role this project would
 19 play in the overall intensification of development in
 20 the North Lake Tahoe area.

0138-2

21 Wilderness values. The area proposed for
 22 development of the gondola is currently wilderness, free
 23 from heavy human imprint for generations now. It has
 24 served as a gateway, not just to the federally protected
 25 Granite Chief Wilderness, but for people willing to make

0138-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0138-2, Wilderness (W2)

Impacts related to the Granite Chief Wilderness and other wilderness areas are addressed in Section 4.3, "Wilderness," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

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0138-2
cont'd

1 the hike and experience the pristine nature of the Five
2 Lakes Trail. This proximity is the reason that the U.S.
3 Forest Service found potential impacts to opportunities
4 for solitude or primitive, unconfined recreation.

0138-3

5 Proposed resource protection measures,
6 consisting of Forest Service design guidelines, intended
7 to help the built environment blend in with the natural,
8 appear entirely inadequate to eliminate the adverse
9 impacts. The proposed route would run through the
10 wilderness designation within 75 feet of the federally
11 owned Granite Chief Wilderness area. Lift towers,
12 cables, and angle stations are incompatible with the
13 wilderness experience, even if you paint them green.

0138-4

14 There's a unique sense of place at the crest of
15 the Sierra and industrial scale infrastructure looming
16 over Granite Chief Wilderness presents a clear threat to
17 the integrity of the Five Lakes Trail and to the
18 wilderness experience.

0138-5

19 Next, wildlife. The project runs through land
20 identified by the United States Fish and Wildlife
21 Service as critical habitat for the preservation and
22 recovery of the endangered Sierra Nevada yellow legged
23 frog. KSL's proposal would place the angle station, a
24 major piece of industrial infrastructure, right next to
25 known populations of frogs at Barstool Lake. Even the

0138-2 cont'd, Wilderness (W2)

0138-3, Resources Protection Measures/Mitigation Measures (RPM/MM)

The comment does not provide specific reasons specifying why the RPMs are inadequate to eliminate adverse impacts to wilderness areas. Therefore, a response cannot be provided. Land use compatibility is addressed in the Draft EIS/EIR in Sections 4.3, "Wilderness," and 4.4, "Land Use."

0138-4, Wilderness (W2)

See response to comment 0138-2, above, regarding wilderness effects.

0138-5, Wildlife and Aquatics (W&A)

Impacts related to the Sierra Nevada yellow-legged frog are addressed in Section 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0138-5
cont'd

1 environmentally preferable alternative routes would
2 disturb and destroy wetland and riparian habitat usable
3 by the endangered frog.

0138-6

4 Lastly, development intensification. Although
5 proponents tout their project as a traffic solution, the
6 Forest Service and Placer County have found that
7 construction of the Squaw/Alpine gondola would actually
8 attract more than 700 new visitors and put around 430
9 more cars on the road during busy weekend days.

10 When the project is considered cumulatively
11 along with KSL's controversial waterpark and the Village
12 at Squaw Valley expansion plans, the picture is
13 particularly grim. Travelers would expect slow speeds
14 and long waits extending from Interstate 80 to Squaw
15 Valley.

0138-7

16 Sierra Watch is concerned that the project may
17 also encourage new development in a treasured alpine
18 landscape by providing new growth-inducing
19 infrastructure. A gondola would not only connect Alpine
20 Meadows to existing and proposed development in Squaw
21 Valley, it would also stop in the midst of the White
22 Wolf property, in between the two resorts. That's where
23 Troy Caldwell has submitted initial plans to build 38
24 luxury homes, a ski lift, a lodge, tennis courts,
25 equestrian facilities, with a connection to the new

0138-5 cont'd, Wildlife and Aquatics (W&A)

0138-6, Transportation and Circulation/Traffic and Parking
(T&C/T&P)

Impacts related to traffic are addressed in Section 4.7,
"Transportation and Circulation," in the Draft EIS/EIR. In
particular, cumulative traffic impacts are described in Section
4.7.4.2. RPMs and mitigation measures are identified where
appropriate. No specific issues related to the content, analysis,
or conclusions in the Draft EIS/EIR are raised in this comment.
No further response is warranted.

0138-7, Other NEPA/CEQA Analysis (ONCA)

See Section 5.2.3, "Growth-Inducing Impacts," in the Draft
EIS/EIR. Cumulative effects of the project in connection with
other probable future projects (including the proposed White
Wolf Development) are evaluated in Sections 4.1 through 4.17.
No specific issues related to the content, analysis, or
conclusions in the Draft EIS/EIR are raised in this comment.
No further response is warranted.

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0138-7
cont'd

1 gondola as a central amenity.

2 Thank you for listening to my comments prepared

3 for today and Sierra Watch looks forward to submitting a

4 written comment to you for your view as well. Thank

5 you.

6 CHAIRPERSON NADER: Thank you. And you kept

7 that in your three minutes, so I appreciate that.

8 Good morning.

9 MS. WALLER: Good morning. Ellie Waller, Tahoe

10 Vista resident. I need to add PO Box 535, Tahoe Vista,

11 California 96148 to my sign-in. Thank you very much

12 there.

0138-8

13 Simply stated, keep the gondola out of

14 congressionally designated wilderness and design low

15 profile for a better visual outcome that will have a

16 less of a visual impact on Five Lakes and the wilderness

17 experience, which is equally another outdoor recreation

18 arena. This comes down to a skier experience at the

19 expense of environmentally superior and less scenic

20 impact alternatives.

0138-9

21 Be reminded that any number increase of people

22 in cars on State Route 89 will exacerbate an already

23 overburdened highway. Caltrans, the sheriff, and CHP

24 tried a lane shift this season unsuccessfully and

25 ultimately has cumulative evacuation impacts with this

0138-7 cont'd, Other NEPA/CEQA Analysis (ONCA)

0138-8, Wilderness (W2)

Impacts related to the GCW and visual resources are addressed in Sections 4.3, "Wilderness," and 4.2, "Visual Resources," respectively, in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0138-9, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Impacts related to traffic, including on SR 89, are addressed in Section 4.7, "Transportation and Circulation," in the Draft EIS/EIR. RPMs and mitigation measures are identified where appropriate to reduce significant and potentially significant impacts. Impacts related to emergency evacuation are addressed in Section 4.6, "Public Safety," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0138-9
cont'd

0138-10

1 project and others as mentioned.

2 Lastly, Martis Valley West Parcel is an

3 excellent example of community pushback due to obvious

4 scenic and similar building issues atop a ridgeline,

5 evacuation issues, and unintended but real impacts to

6 the Lake Tahoe Basin.

0138-11

7 Duly note that -- the respect to this

8 commission from the community for their extraordinary

9 research during that process, as well as this one, and

10 not certifying that EIR for various and similar reasons

11 to this one, and, sadly, was overturned by our Board of

12 Supervisors.

13 Thank you for the opportunity today.

14 CHAIRPERSON NADER: Thank you.

15 And I may have not said it earlier. But any of

16 you who are going to make comments today, I would also

17 encourage you to do this -- was mentioned by our first

18 commenter -- that you document this and put it in

19 writing, either in an e-mail or a letter to us. I think

20 that just helps to support your comments by doing that.

21 E.J., the next?

22 MR. IVALDI: The next was Greg Parrott. And

23 following that is Jeff Shellito and Ron Cohen.

24 MR. PARROTT: Hi. My name is Greg Parrott.

0138-12

25 I've been hiking up in the Five Lakes area for

0138-9 cont'd, Transportation and Circulation/Traffic and
Parking (T&C/T&P)

0138-10, Other (O2)

No specific issues related to the content, analysis, or
conclusions in the Draft EIS/EIR are raised in this comment.
No further response is warranted.

0138-11, Other (O2)

No specific issues related to the content, analysis, or
conclusions in the Draft EIS/EIR are raised in this comment.
No further response is warranted.

0138-12, Opinion (O1)

The comment provides an opinion regarding the merits or
qualities of the project and does not address the content,
analysis, or conclusions in the Draft EIS/EIR. The Forest
Supervisor for the TNF and the Placer County Planning
Commission and Board of Supervisors will take the
commenter's opinions regarding the merits or qualities of
the project into consideration when making a decision
regarding the project.

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0138-12
cont'd

1 about 50 years, so pretty familiar with that. And my
2 principal motivation for me is just to advocate among
3 the choices, that Alternative 4 as far superior.
4 Alternative 2, one of the areas that, again, is
5 extremely close to the turn station at Alpine Meadows,
6 comes within a hundred feet of what's called, here,
7 Barstool Lake. At one point, it was also called Frog
8 Lake.

0138-13

9 If that lake gets developed -- first off, I
10 would advocate that if any of you have not actually gone
11 to the lake, that you go, just to get the visual
12 appreciation of the lake. If it gets developed, there's
13 the endangerment of the species, that's been talked
14 about, that -- the frog. But in addition, it sets a
15 precedent, in part, because White Wolf also wants to put
16 a station up there, a dropoff station in another
17 proposal. And secondly, the installation of the shelter
18 for the Gazex exploders would need some maintenance path
19 and so forth for people to service it.

20 So once the precedent is set by putting in
21 something that -- a turn station for Alpine Meadows
22 at -- using Alternative 2, once that precedent is set,
23 the incremental change to, then, say, okay, let's
24 approve the White Wolf; doesn't make that much of a
25 difference. That precedent is set; basically destroys

0138-12 cont'd, Opinion (O1)

0138-13, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0138-13
cont'd

1 the lake, whether you call it Frog Lake or you call it
2 Barstool Lake. Once that precedent is set, you could
3 rename the lake as Lost Lake. You essentially lost one
4 of the relatively uncommon lakes within the high alpine
5 area.

0138-14

6 So my advocacy is for Alternative 4.

7 Thank you.

8 CHAIRPERSON NADER: Thank you for your
9 comments.

10 MR. SHELLITO: Hello. My name is Jeff
11 Shellito. I'm a homeowner in Truckee. I've been a
12 skier up here since the 1970s and past season
13 ticketholder at Squaw and Alpine Squaw, as well as Sugar
14 Bowl and Northstar.

0138-15

15 I'm urging that you not -- that you not
16 consider the option 2 and give more emphasis to some of
17 the others, if you have to approve it at all.

0138-16

18 But I have to say, I was involved in the
19 original wilderness effort by the region, including the
20 Sierra Club, which I was a member of in the 1970s. And
21 I can say that the reason Granite Chief was pushed for
22 wilderness was to not only stop commercial logging in
23 the Diamond Crossing area through some land exchanges
24 with Southern Pacific, but was to prevent encroachment
25 by the existing ski developments in Squaw Valley and

0138-13 cont'd, Opinion (O1)

0138-14, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0138-15, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0138-16, Other (O2)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

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0138-16
cont'd

1 Alpine Meadows.

2 I think one of the reasons the boundaries were
3 written the way they were, were originally to prevent
4 encroachment of ski development, and it's unfortunate
5 the Forest Service didn't act on trying to do land
6 swaps, like it did in Diamond Crossing to -- instead of
7 having Southern Pacific sell it to the Caldwell family.
8 But that's past history.

9 I'm going to save most of my comments on the
10 policy issue, because you said that would be something
11 at a later hearing.

12 CHAIRPERSON NADER: Right.

0138-17

13 MR. SHELLITO: But one of the things I wanted
14 to bring your attention was, I'm not sure the Draft EIR
15 has really spent enough time examining the impact of
16 climate change on the viability of this gondola's
17 operations and the operations of both ski resorts.

18 And I say that because, just like last winter
19 where we had a lot of rain events, on top of snow, and
20 we had a lot of wind holds -- and in a case of a lot of
21 the resorts, they didn't have enough snow to really open
22 their terrain at Christmas.

23 And in the case of Sugar Bowl, which I'm more
24 familiar with, because I've been a season pass holder.
25 The Forest Service, a number of years ago, approved two

0138-16 cont'd, Other (O2)

0138-17, Greenhouse Gases (GHG)

Climate change is addressed in Section 4.11, "Greenhouse Gas Emissions and Climate Change," in the Draft EIS/EIR. See in particular the discussion under Impact 4.11-2, which describes the impacts of climate change on the project.

0138-17
cont'd

0138-17 cont'd, Greenhouse Gases (GHG)

1 new lifts on Mt. Judah. It's called the Judah chair and
2 the Summit chair. And both of those, at least in the
3 last two years, were hardly ever open. I don't think
4 the Summit Chair opened at all this year. And, yet, the
5 infrastructure required for those two chair lifts are
6 permanently there, on Donner Summit. I know there's not
7 a wilderness ramification, but I'm concerned that once
8 this gondola is built, it's going to be a permanent
9 fixture on what currently, on the Alpine Meadows side,
10 is undeveloped ridgelines and steep slopes.

11 So I think, when you prepare the Final EIR, you
12 might want to examine how often this gondola might
13 really be running if we have more winters like we did
14 last winter, where there were a lot of wind holds in ski
15 resorts; there was inadequate coverage, and, yet, the
16 infrastructure required would be permanent.

17 Thank you.

18 CHAIRPERSON NADER: Thank you for your comment.

19 MR. SHELLITO: Thank you.

20 CHAIRPERSON NADER: Appreciate it.

21 MR. COHEN: Hi. I'm Ron Cohen. I'm the acting
22 president and chief operating officer for Squaw
23 Valley/Alpine Meadows. Thank you for the opportunity to
24 speak with you today.

25 I first wanted to thank you, and particularly

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0138-18

1 staff and the agencies for the work done on this very
2 comprehensive document. So thank you.

3 It's -- the process has been long and it's a
4 big document. But the development of the alternatives
5 are exactly what this process is supposed to achieve,
6 and, as a company, we're very thankful for what's
7 happened to date.

0138-19

8 To speak to two of the issues that were raised,
9 you know, of particular interest, we're very interested
10 in working with the environmental community. And we've
11 continued to do so throughout the process since making
12 the project application. Two of those particular issues
13 are the Granite Chief Wilderness and the Sierra Nevada
14 yellow legged frog. We focused on those issues with the
15 environmental community, and I'm very happy to share
16 with you that we are signatories now to a Memorandum of
17 Understanding with the Sierra Club, National Mother
18 Lode, Local Tahoe, where we are agreeing to a set of
19 principles that align around the alternatives developed
20 in the agreement.

21 And so we think that's a great thing. As a
22 company, we'll continue to try to work with the rest of
23 the environmental community, where we think, at the --
24 at the end of that process, with the California
25 Wilderness Coalition as well, and are hopeful that we'll

0138-18, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

0138-19, Summary (S2)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0138-19
cont'd

1 be signing an MOU with them as well.

2 And so we're going to continue down that path

3 of trying to address the issues that are raised by the

4 project and achieve the best possible project for the

5 community, for the environment, and for skiers and

6 snowboarders that come to Squaw Valley/Alpine Meadows.

7 So thank you for everything you have done and

8 appreciate it, and look forward to working with you on

9 the project as it goes forward.

10 CHAIRPERSON NADER: Thank you for your comment.

11 MR. IVALDI: Chairman, I have just four names

12 on the list. I'm going to read those four names, and

13 please come up in that order. Craig Hamilton, Melissa

14 Siig, Mark Calhoun, and Mary Coolidge.

15 MR. HAMILTON: Hi. I'm Craig Hamilton. I live

16 on Alpine Meadows Road, right in the heart of the

17 avalanche zone, very close to where all this is going to

18 happen.

19 And I just want to say, first of all, we love

20 the idea of the gondola. Strong advocate for

21 Alternative 4. You know, the visual impact already on

22 Five Lakes Trail of the Gazex machines has been pretty

23 substantial. We go hiking up there now and right in

24 your face, these giant, kind of, monstrous industrial

25 looking things.

0138-20

0138-21

0138-19 cont'd, Summary (S2)

0138-20, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0138-21, Visual Resources (VR)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

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0138-22

1 And that's what I want to fundamentally draw
2 attention to in my comment, is the impact of these Gazex
3 installations on those of us living in Alpine Meadows.
4 Anybody here, who lives in Alpine Meadows, who
5 experienced the first Gazex detonations of the new
6 machines last winter, probably shares my sentiment that
7 it was a terrifying event.

8 And we live in a -- we live in an area where we
9 go through bomb blasts every time there's snow. So
10 we're used to blast, blast, blast, waking up. You know,
11 your alarm clock is the detonations. But the Gazex
12 machines, the shock wave force hitting our houses on
13 Alpine Meadows Road, actually feels like your house is
14 being hit by a bomb. It is -- it's extremely intense,
15 it's frightening. One of my neighbors said his children
16 burst into tears when the thing went off.

17 And so the thought that a bunch more Gazex
18 machines are going to get installed right by our homes
19 there just has me want to draw attention to both the
20 sonic and, kind of, blast impact of those on our little
21 neighborhood.

0138-23

22 And also the visual impact on Five Lakes Trail.
23 Because I hiked up there the other day and, again, was
24 sort of reminded, wow, this experience has dramatically
25 changed because now we have these -- all this

0138-22, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0138-23, Visual Resources (VR)

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0138-23
cont'd

1 industrial, you know, big machines here on our trail.
2 And the thought that a whole nother cluster are going to
3 be there, on that trail, visually, is disturbing.

0138-24

4 So I just would like to draw the attention back
5 to some of the alternatives that were presented in the
6 original analysis, that led to the Gazex install. I
7 know this is about the new -- the new installation, but
8 I just feel, the whole idea maybe needs to be revisited
9 with an eye to the impact it's having on that little
10 community up there, those of us who live there.

11 And I say that with some ambivalence because we
12 obviously also value the protection that they bring.
13 And I know there was a snow nets alternative considered
14 that was about eight times as costly as the Gazex
15 option. And -- but it would probably have a much less
16 impactful -- environmentally and just from a habitation
17 point of view alternative.

18 So that's just the main thing I wanted to bring
19 up as this is all being evaluated is, are there other
20 ways to deal with that issue.

21 Thank you.

22 CHAIRPERSON NADER: Thank you for your
23 comments.

24 MS. SIIG: My name is Melissa Siig. I am a
25 14-year resident and homeowner in Alpine Meadows.

0138-23 cont'd, Visual Resources (VR)

0138-24, Other (O2)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0138

Public Meeting

0138-25

1 So you are not going to present the Gazex
2 separately, right? We can comment on this now?

3 Okay. So I live right near Craig in the heart
4 of avalanche territory. My house has been hit multiple
5 times by avalanches. Last year and 2011, were major
6 occurrences which made national news. We're very
7 concerned about avalanches in the area. We've been
8 urging the County to do something for years. We're very
9 appreciative that action has been taken, because this is
10 a very concerning area, not just for the residents and
11 the homeowners, but people driving up and down the road
12 and employees who drive up and down the road.

0138-26

13 However, we are deeply concerned that there was
14 no testing of the Gazex before it was put in. No sonic
15 testing on the impacts to the houses. And it's not just
16 felt on the houses lining Alpine Meadows Road. People
17 hear it through the entire valley.

18 And like Craig said, it sounds like a bomb,
19 like a military style bomb is being dropped near your
20 house. And I've lived through years and years of your
21 typical avalanche bombs being thrown. And I would say,
22 this is 10 to 20 times stronger. It is terrifying. It
23 rattles your windows. I worry about the foundation of
24 my house.

25 And this past winter, we only had it a few

0138-25, Other (O2)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0138-26, Other (O2)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0138-26
cont'd

1 times. We didn't have such a massive winter. But just
2 thinking about next winter actually terrifies me. And
3 it's -- it's a mixed feeling, because I'm so happy that
4 there's something that is protecting the road and our
5 houses and can be used on a 24-hour basis, versus ski
6 patrol hand charges, which are only during daylight
7 hours.

8 However, I'm very concerned that there was not
9 more testing done. I'm sure this had to do with Office
10 of Emergency Services, but I don't understand why there
11 was no testing, there was no public hearing. These were
12 just pushed through. And I worry about the impacts of
13 Gazex to the houses. I think they can protect. I think
14 they can also harm. So I urge you to look more into
15 that. And, you know, there's more being put in as we
16 speak.

0138-27

17 Just quickly, on the gondola. I am a little
18 ambivalent on the gondola, but I urge you all -- I don't
19 know if you've been up Five Lakes. It concerns me that
20 people are going to be deciding the future of this, who
21 have never even been up Five Lakes, including the
22 commissioners and the Board of Supervisors. I encourage
23 you to go up there. It is a beautiful area. And I
24 encourage you also to look at this cumulatively. I
25 feel, sometimes, the County looks at things in

0138-26 cont'd, Other (O2)

0138-27, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0138

Public Meeting

0138-27
cont'd

1 isolation, but there are so many projects proposed for
2 Squaw and Alpine. I encourage you to look at this.

3 And it worries me also that if they say it will
4 just increase skier visits a little bit, I'm not sure of
5 the purpose of this. If it's going to increase traffic,
6 but not increase a ton of skier visits, why bother?

7 Thank you.

8 CHAIRPERSON NADER: Thank you for your
9 comments.

10 MR. CALHOUN: Mark Calhoun, resident of Olympic
11 Valley and member of the Squaw Valley MAC.

0138-28

12 Just two issues that I'm concerned with: We
13 had a presentation at MAC by Heather and this one was
14 more comprehensive. And there's -- in talking with
15 people and residents in Squaw, the one issue that kept
16 coming up that I just want to impress on you is the
17 close proximity of the base station in Squaw to the
18 Squaw Valley Lodge. And I just had several people bring
19 it up.

0138-29

20 I also own a grocery store in Squaw and people
21 would come up to me in the store, too, that have their
22 condos in the Squaw Valley Lodge. And so -- and then
23 they would also mention the proximity to Cushing Pond
24 also. But -- so that was something that came up quite a
25 bit, so I think that should be looked at closer.

0138-27 cont'd, Opinion (O1)

0138-28, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0138-29, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0138-29
cont'd

1 So from that point of view, Alternative 4 is
2 probably the best, but I'm not going to pass judgment on
3 that. I am still open minded. I'm just passing on what
4 I have been hearing from other people.

0138-30

5 And then the other concern of mine is, I don't
6 have -- we asked a question of Heather at the meeting.
7 But I don't know -- and Lindsey clarified it somewhat.
8 But I would still like to have a little more clarity on
9 the roads -- or the disturbance that will occur on
10 building the -- the towers, the foundations for the
11 towers.

12 As I understand, in Alternative 3 and 4, it's
13 on Troy's property, and it already has some
14 infrastructure there. So that's not a problem.

15 But, for example, if number 2 was done, that
16 would be substantial impact of some kind. So just to
17 get some more clarity on that, I would like to get that.

18 Thank you very much for your time.

19 CHAIRPERSON NADER: Thank you for your
20 comments.

21 MS. COOLIDGE: Hi. I'm Mary Coolidge. I'm
22 box -- what is my box? 1857 Tahoe City.

23 I've lived in Alpine Meadows off and on since
24 1971. Seen a lot of changes, a lot of them good, most
25 of them good.

0138-29 cont'd, Opinion (O1)

0138-30, Alternatives (A)

Table 2-2 of the Final EIS/EIR presents a comparison of the disturbance of key project elements associated with each alternative. The remainder of the comment raises no specific issues related to the content analysis, or conclusions in the Draft EIS/EIR. No further response is warranted.

0138

Public Meeting

0138-31

1 And I -- my -- I guess I have three things that
 2 I'm concerned about: The first is the visual impact.
 3 You are going to be able to see that gondola along the
 4 ridgeline when you drive up the Alpine Meadows Road,
 5 because I live on upper John Scott Trail, and I'm going
 6 to be able to see that from my living room, and I don't
 7 want to, particularly.

0138-32

8 I'm concerned about the traffic because as
 9 everyone else has said, we've got a lot of stuff in the
 10 pipeline now, in terms of development. We already have
 11 a horrendous traffic issue. On the weekends, I work in
 12 Squaw Valley. And from Alpine Meadows to Squaw Valley
 13 is maybe three and a half to 5 miles, and it can take me
 14 up to an hour to make that left turn on 89, get down 89
 15 enough to make a left turn onto Squaw Valley Road. And
 16 by about ten past 9:00, Squaw Valley is parked out, so
 17 they are starting to send people to Alpine.

0138-33

18 And I think -- so if we have the gondola, the
 19 people that can't park at Squaw are going to want to
 20 come and park at Alpine. Alpine gets marked out by
 21 9:30, quarter to 10:00, so the Alpine Meadows Road has a
 22 giant traffic jam because it's not nearly as wide and
 23 it's longer than the Squaw Valley Road.

0138-34

24 And my third point -- I agree with everybody
 25 who lives in Alpine. The Gazex is terrifying. My house

0138-31, Visual Resources (VR)

Visual impacts of the proposed gondola are addressed in Section 4.2, "Visual Resources," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0138-32, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The comment suggests that the proposed Gondola project would cause diversion of traffic to the Alpine Meadows ski resort due to the lack of available parking at Squaw Valley. Further, the comment states that the added traffic would cause traffic jams on Alpine Meadows Road. The comment is accurate in that diversion of existing skiers from the Squaw Valley ski area to the Alpine Meadows ski area could occur under certain conditions. This potential scenario is evaluated in the Draft EIS/EIR. Refer to pages 4.7-22 through 4.7-25 of the Draft EIS/EIR for a detailed discussion of the expected diversion during study periods. As shown in the project's trip generation estimate (refer to Table 4.7-13), the effect of diverted skiers between one resort and the other was considered in the traffic impact analysis. As shown, the project is estimated to result in a shift in 300 daily trips from the Squaw Valley to Alpine Meadows Ski Areas on a Saturday. On a Sunday, the project would result in a shift of 880 daily trips from Alpine Meadows to Squaw Valley. This corresponds to 48 shifted Saturday AM peak hour vehicle trips and 141 shifted Sunday PM peak hour trips. The impact conclusions in the EIS/EIR consider these diversions. Also see the Master Response related to Vehicle Trip Reduction Measures in Section 1.8, "Master Responses."

0138-33, Transportation and Circulation/Traffic and Parking (T&C/T&P)

The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation." In particular, the traffic analysis in the Draft EIS/EIR includes an analysis of parking and changes in traffic patterns and parking use between Alpine Meadows and Squaw Valley with implementation of the proposed Gondola.

0138**0138-34, Noise (N)**

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0138

Public Meeting

0138-34
cont'd

1 feels like it comes up, off the foundation, and then
2 settles back down and we all scream and jump. I know
3 that there's three more currently under the -- they are
4 being put in on what's called the South Ridge, so just
5 around the corner, kind of, from Five Lakes. They are
6 already putting in, I think it's, three, it may be four
7 more.

8 So if we count those, plus the ones that are
9 going to go in with the gondola, it's going to be -- I
10 don't think anybody is going to want to live there
11 anymore.

12 I don't know what the solution is. I don't
13 know if there's a warning system. But they blast off,
14 and especially before we had very much snow, it really
15 was terrifying. Now, it's not quite so bad when there's
16 a snow cushion. But it's a real issue and I don't know
17 what the solution is. But I don't think more is
18 necessarily better.

19 Thank you all for your attention and for coming
20 today.

21 CHAIRPERSON NADER: Thank you for your
22 comments.

23 Anyone else, E.J.?

24 MR. IVALDI: I don't have anymore on the list,
25 but I will double check the list up there so maybe open

0138-34 cont'd, Noise (N)

1 it up and see if there's anyone else.

2 CHAIRPERSON NADER: If there's no one else, I

3 am going to close the -- is there anybody else here.

4 I'm going to close the public comment on this.

5 And again, I would encourage you, if you did

6 comment or if you didn't, please, if you have questions

7 you want to bring up with regards to the EIS and the

8 EIR, please document it. Please send it in. And they

9 will be addressed. You will get a response to your --

10 to your letters or your e-mails. So please get those

11 in. The time -- I think it's stated -- what is it? I

12 think it's June 11th?

13 MS. BECKMAN: June 11th.

14 CHAIRPERSON NADER: Thank you, Heather.

15 June 11th.

16 So I appreciate you all attending for this

17 item.

18 So I bring it back to the Commission for any

19 comments that you, as commissioners, would like to bring

20 up, about anything that you would like to see dealt

21 with.

22 MR. SEVISON: What's the next steps?

23 Oh, here she is.

24 MS. BECKMAN: Here I am.

25 So next steps, after the close of public

0138

Public Meeting

1 comment on June 11th, the County and Forest Service will
2 collectively get back together with our consultants and
3 formally respond to comments.

4 This Gazex issue has emerged in the last couple
5 of weeks in the several -- we've had three night
6 meetings on the project, leading up to this Planning
7 Commission, and Gazex has certainly been emerging. So
8 that's definitely something that we'll be researching
9 and looking into more and I'm sure we'll address in some
10 fashion in the final document.

11 MR. SEVISON: Thank you.

12 CHAIRPERSON NADER: Great.

13 Any questions for Heather or any of the
14 consultants here?

15 No? Okay. I guess not.

16 MR. MOSS: Thanks for coming.

17 MONTGOMERY: Well, then, I guess we'll close
18 this part of our meetings related to the hearing for the
19 EIS.

20 MR. IVALDI: Chairman, I would just add that
21 just for everybody's reference, the places you can
22 submit comments are up on the screen, so we'll leave
23 that on. And our next item is not until 11:30. So
24 we'll leave that up for the next 15 minutes.

25 CHAIRPERSON NADER: We'll take a 20-minute

1 break and be promptly back here at 11:30 for our next
2 item.

3 MR. IVALDI: One more comment. That
4 information is also up on our -- the county website as
5 well --

6 CHAIRPERSON NADER: Okay. Thank you.

7 MR. IVALDI: -- as well as the documents.
8 Thank you.

9 CHAIRPERSON NADER: Thank you, E.J.

10 (Time noted: 11:12 a.m.)

11 (Further proceedings were held but
12 not reported by the Certified
13 Shorthand Reporter.)

14 ---o0o---

0138

Public Meeting

1	CERTIFICATE OF REPORTER
2	
3	I, KATHRYN S. SWANK, a Certified Shorthand Reporter
4	of the State of California, do hereby certify:
5	That I am a disinterested person herein; that the
6	foregoing proceedings was reported in shorthand by me,
7	Kathryn S. Swank, a Certified Shorthand Reporter of the
8	State of California, and thereafter transcribed into
9	typewriting.
10	I further certify that I am not of counsel or
11	attorney for any of the parties to said proceedings nor
12	in any way interested in the outcome of said
13	proceedings.
14	IN WITNESS WHEREOF, I have hereunto set my hand
15	this 5th day of June 2018.
16	
17	
18	
19	
20	
21	KATHRYN S. SWANK, CSR
22	Certified Shorthand Reporter
23	License No. 13061
24	
25	

Golden State Reporting & Video Services (866) 324-4727

Page: 55

Will Hollo

From: Annie Ballard <aaballard@gmail.com>
Sent: Tuesday, June 12, 2018 10:19 AM
To: Scoping Comments
Subject: No common good in the Squaw-Alpine gondola

Dear Forest Service,

0010-1 Please accept my comment into the public record a few hours after the deadline; I had a family health emergency yesterday.

There is no justification for allowing the Squaw-Alpine Gondola to cross, and impact heavily on, our public lands. The motto of the Forest Service reads: **Caring for the Land and Serving People**. This destructive project does neither.

In order for the Forest Service to overlook the multitude of negative environmental impacts outlined in the Draft EIS/EIR, there should be demonstrable and concrete ways in which the gondola will serve the public good, across a diverse spectrum of users and stakeholders. Unlike the controversial development proposed within Squaw Valley, which would be constructed on land already disturbed by the hand of man and has a self-contained viewshed, the gondola intrudes into a pristine natural environment, disturbs currently untouched ecosystems and habitats, and can be seen from many miles in every direction.

How many members of the public will actually benefit from this project? The stated purpose of the gondola is to transport a subset of skiers, in winter only, from one ski area to another. The other reasons stated by the forest service, namely, the need for added beginner/intermediate terrain at Squaw and added amenities at Alpine Meadows, again serve only a small subset of the overall users of these for-profit, private resorts, and are weak reasons to undertake such a massive and impactful project. SVSH could improve the amenities at Alpine via other avenues, and Squaw only needs more beginner/intermediate terrain when the upper mountain cannot open in inclement weather, which begs the question, "Can the proposed Squaw-Alpine gondola fully operate in conditions when the upper mountain at Squaw cannot operate, and with Summit chair most likely closed on those days, could Alpine Meadows effectively handle additional users?"

0010-2 At very best, the gondola will operate five months out of the year, for a finite number of years, until climate change shortens and then eventually eliminates the viable ski season in the Sierra Nevada. The towers and Gasex exploders/shacks will, however, remain 365 days a year as a scar on the landscape and a relic--forever.

0010-3 Being an avid skier myself and having skied at some of the mega-resorts like Snowbird-Alta and many places in the Alps, I would testify that the time spent traversing from one major area to another rather than skiing runs on smaller lifts is wasted time, especially if you have to return to your car at the end of the day. The average skier may use this sort of connecting gondola once or twice as a novelty, soon learning that it detracts from, rather than adds value to, their day on the hill. The beginner/intermediates taking lessons, who need to be transported from Squaw to Alpine on inclement weather days, is a small subset of the users of this huge land area that their needs should not legitimately be considered those of the "public".

0010-4 In sum, the number of users who will benefit from the construction of this damaging, high-impact project represents a small fraction of the overall users of the Squaw and Alpine valleys combined, and benefits that subset of users for less than half of each year.

Conversely, how many members of the public will be *negatively* impacted by this project? The impact of the gondola and its construction on the Five Lakes Trail, one of the most heavily used summer trails in one of Northern California's

0010-1, Purpose and Need (P&N)

The Draft EIS/EIR states that "the Forest Service's purpose for the project is to improve developed winter recreation opportunities in the Scott Management Area, consistent with the LRMP." The management emphasis provided in the Forest Plan for the Scott Management Area supports this purpose; it states that in this management area, "Development of private sector ski area maintenance, operation, and planning will be emphasized during the planning period." As identified by the commenter, the Forest Service purpose and need goes on to identify improved connectivity between the resorts, additional terrain suitable for beginners, and teaching and additional amenities as factors supporting the need for the project, which are all connected to direction provided in the Forest Plan for the Scott Management Area. Actual analysis provided in the Draft EIS/EIR, however, centers around impacts that would occur to individual resources of the human and natural environments as they pertain to the stated purpose and need in Chapter 1, "Introduction." Rationale specifically related to how the project would or would not meet the project's identified purpose and need is provided in the Record of Decision (ROD), which will be prepared and made available as a Draft for public review; Placer County's decision on how the project would or would not meet the project's identified CEQA project objectives will be made by the Placer County Board of Supervisors.

0010-2, Other (O2)

Climate change and visual resources impacts are addressed in Sections 4.11, "Greenhouse Gas Emissions and Climate Change," and 4.2, "Visual Resources," of the Draft EIS/EIR. The climate change analysis not only evaluates the GHG emissions from the project, but also discloses the potential effects of climate change on the project. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master

0010

Responses," for more information on the removal of Gazex from the project.

0010-3, Other (O2)

The comment provides opinions regarding the frequency/amount of use of the gondola if built, implying that levels of use would be low. If use of the gondola is below projections in the Draft EIS/EIR, then several categories of environmental effects would be less than identified in the EIS/EIR (e.g., utilities, traffic). However, no specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0010-4, Recreation (R1)

Project impacts on the Five Lakes Trail are addressed in Section 4.1, "Recreation," of the Draft EIS/EIR. Also see response to comment 0010-3, above, regarding the level of use of the gondola. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

00100010-4
cont'd

premiere tourist destinations, will be devastating. I would like to take a moment to remind you of the significance of this trail in the context of Tahoe area tourism and enjoyment by locals. This is one of only two trails in the region which meets all of the following criteria (the overcrowded Eagle Lake Trail being the other):

- kid-friendly
- dog-friendly
- access to a swim-able alpine lake in under 2.5 miles
- access to wilderness area in under 2.5 miles
- Pacific Crest Trail access
- south-facing, longer usable season than many trails
- spectacular exposed granite landscape, unique to the Sierra Nevada

0010-5

In addition, the gondola will negatively impact the experience of visitors to Granite Chief Wilderness, hikers on the Pacific Crest Trail, residents of Alpine Meadows (through noise pollution from added Gasex exploders, disturbance during construction period, and permanent loss of pristine viewshed). The EIS/EIR also predicts increased vehicular traffic and carbon emissions from those cars as well as the gondola itself, factors which affect all area residents and visitors.

0010-6

I have been a Squaw passholder for ten years, and I remain totally unconvinced that this gondola is anything but a marketing scheme whose real purpose is simply that SVSH will be able to use "Largest Ski Area in North America" or some such slogan. Does the Forest Service really want to be a pawn in that marketing initiative?

I hope that, at the very least, the USFS will diligently review user statistics from Snowbird-Alta, Big Sky-Moonlight, and Whistler-Blackcomb to fully understand the actual end-user benefits resulting from this type of resort expansion, beyond advertising gimmicks that benefit only the corporate owners.

Thank you very much for your time and consideration.

Sincerely,

Annie Ballard

--

Annie Ballard
aaballard@gmail.com
 530-412-1520
 Mailing:
 PO Box 6317
 Tahoe City, CA 96145
 Physical:
 6710 Springs Ct.
 Tahoma, CA 96142

0010-4 cont'd,

0010-5, Other (O2)

These issues are addressed in the Draft EIS/EIR in Sections 4.1, "Recreation," 4.2, "Visual Resources," 4.3, "Wilderness," 4.7, "Transportation and Circulation," 4.9, "Noise," and 4.11, "Greenhouse Gas Emissions and Climate Change."

The Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0010-6, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0038

0038-1, Other (O2)

Potential effects related to wilderness, traffic, emergency evacuation, and water use are addressed in Draft EIS/EIR (see Sections 4.3, 4.7, 4.6, and 4.8, respectively). The comment does not provide specific reasons specifying why the Draft EIS/EIR analysis of these issues is inadequate. Therefore, a further response is not warranted.

0038-1

Date submitted (Pacific Standard Time): 6/5/2018 5:23:06 PM

First name: Caryn

Last name: Dombroski

Organization:

Title:

Official Representative/Member Indicator:

Address1: 10695 Palisades

Address2:

City: Truckee

State: CA

Province/Region:

Zip/Postal Code: 96161

Country: United States

Email: caryndombroski@gmail.com

Phone: 510 501 2017

Comments:

I am strongly opposed to the huge development planned for Squaw as well as the base to base gondola. I've skied both Alpine and Squaw and I've also backpacked extensively in the Sierra. The infringement onto the wilderness area is unconscionable. The traffic impact on the already congested streets of the Tahoe basin during busy seasons will be serious. Emergency evacuation is already fragile at best. None of these issues, nor the water use issue, are adequately addressed in the EIR. This has potential long term and deleterious effects on the wilderness, national forest and waterways of the area. We should object in any and every way possible to the serious impact on forest and wilderness areas.

0032

Will Hollo

From: Megan Chillemi <megan@chillemi.com>
Sent: Friday, June 22, 2018 11:05 AM
To: Scoping Comments
Subject: Base to Base Gondola

Gentlemen:

Our two primary concerns on the proposed base to base gondola are twofold:

- 0032-1 | • Impact on the Granite Chief wilderness. Either we are going to maintain a wilderness area, or not.
- 0032-2 | • KSL has maintained that the gondola will be operational only during the winter season. The ski resorts are all searching for a new business model with the continuing lack of snow and shorter winter season. The gondola will soon be a new tourist attraction, with year-round operation.

Megan & Jack Chillemi
 8819 Cutthroat Avenue
 Kings Beach, California 96143

0032-1, Wilderness (W2)

Impacts related to the GCW are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0032-2, Project Description (PD)

Proposed operation and long-term maintenance of the gondola is described on pages 2-13 and 2-14 of the Draft EIS/EIR. Additionally, RPM MUL-4 in Appendix B of the Draft EIS/EIR limits seasonal operation periods; implementation of this RPM would be part of the Forest Service and County permits and cannot be modified without amendments to said permits. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0065

Will Hollo

From: Ron Grassi <ronsallygrassi@mac.com>
Sent: Tuesday, June 12, 2018 6:09 PM
To: Scoping Comments
Cc: Judy and Jerry Winters
Subject: Objection to Gondola

0065-1 | I am writing to object to the Squaw Alpine gondola proposal. The impact of this gondola would significantly impact in a very negative way the environment at Lake Tahoe. This wilderness area, as designated, must be left intact. It is a special place for hiking and enjoying the quiet and beauty of the Sierras. Please deny this project and preserve our wilderness as a heritage area and special place for the present and for future generations. Thank you.

Sincerely,

Sally Grassi
450 Jackpine St
Tahoe City

0065-1, Opinion (O1)

Although the project would be located outside of the Lake Tahoe Basin, the Draft EIS/EIR impact analysis expands to the Basin for specific resource areas, such as traffic (including VMT) and air quality; see Sections 4.7, "Transportation and Circulation," and 4.10, "Air Quality," of the Draft EIS/EIR for these impact analyses. Impacts to the wilderness areas are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR.

0078

Will Hollo

From: mitzi hodes <dssbats@gmail.com>
Sent: Tuesday, June 12, 2018 8:52 AM
To: Scoping Comments
Subject: NO

0078-1 | No, No Tram.
Squaw already exceeds reasonable parking expectations- there is NO place for more people.
Make them address parking first.
The tram is the worst idea so far (besides an indoor water park- remember Blythe Arena fell down from snow).
Do not allow them to desecrate this area for greed please.
Mitzi Hodges

--

Hi! Have a GREAT Day!!
Mitzi

0078-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0102

Shirlee Herrington

From: Barbara Mackenstadt <bdmacke@me.com>
Sent: Tuesday, June 12, 2018 10:27 AM
To: Placer County Environmental Coordination Services
Subject: No on base station at 5 lakes

0102-1 | When are we going to realize that the Tahoe area is a treasure? By making 5 lakes access easy, we will soon see the graffiti that has spread like a fungus through the summits abandoned train snow sheds.

Unless there is enforcement for vandalism and litter and strict use guidelines, this area will be trashed.

No to the tram. No to this stop on the tram.

Sent from my iPhone

0102-1, Opinion (O1)

Under Alternative 2, the proposed gondola would only provide access to the Five Lakes Trail to skiers, during winter, and access would not be that easy (for additional discussion, see Impact 4.1-1 in the Draft EIS/EIR). This access would only be provided in winter when the gondola is operational (see RPM MUL-4). Regarding the comment that improved access would lead to graffiti and vandalism, this issue was not addressed in the Draft EIS/EIR because it is not an environmental impact required to be analyzed per NEPA or CEQA. Nonetheless, all comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Will Hollo

From: Glen Poulsen <skikrazd@hotmail.com>
Sent: Wednesday, June 13, 2018 4:11 PM
To: Scoping Comments
Subject: Comment on Squaw Alpine Connector Gondola

0143-1 | To Whom it may Cpncern, Regarding the Squaw Alpine Gondola, I am in support of a linkage between the two resorts. I believe that the linkage should be achieved while augmenting uphill transportation on Squaw side of the gondola. I believe that the alignment should follow and replace the existing red dog lift and then progress towards Alpine. This would provide high speed uphill capacity for Red Dog. From the top of red dog the alignment should proceed into the Alpine Village. In lieu of this, Of all the alternatives offered I would favor the furthest east alignment of the gondola or Alternative 4. Thanks for your Attention! Glen Poulsen 380 Grove Street, Tahoe City, CA 96146

0143-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0154

Will Hollo

From: jim sajdak <jim@cs3.us>
Sent: Wednesday, June 13, 2018 10:46 AM
To: Scoping Comments
Subject: Squaw Valley Gondola

U.S. Forest Service,

0154-1 | I would like to encourage you to visit the proposed site of the gondola project while taking a hike up the Five Lakes Trail. Once standing on the trail you will hopefully have an at god moment with the surrounding beauty of the area and realize the significant impacts that this project will have on the beauty of the environment.

It's not just about the gondola project, it's about the all of the future development right on the boundary of the Granite Chief Wilderness that will follow. Lake Tahoe is very unique; there is one two lane road from Truckee to Squaw Valley. The current traffic on ski weekends backs up to I-80 located 12 miles from the resort. In the Tahoe Basin we have the Lake, a two lane road and a mountain. Again there are no secondary roads. The proposed project with further development already planned will result in more congestion.

Please protect what is left of the Granite Chief Wildness Area and our beautiful environment here in Tahoe by listening to the people that recreate in the Granite Chief Wilderness and not approve the Gondola Project. The only benefit is to KSL and the developers at White Wolf. I can assure you that there aren't lines of skiers and boarders waiting for the gondola to be constructed. The locals who ski at one resort really don't care to ski at the other resort.

The Truckee Sun paper dated April 27, 2018 has an article by Darla Mazzonia, a Forest Service Ranger. The article states "what a treasure Desolation Wilderness is". It's a bit ironic that after reading Darla's article that I am asking the Forest Service to listen to its own ranger and protect our treasure. I encourage you to read the article from one of your own.

Jim Sajdak
 Tahoe City

0154-1, Opinion (O1)

Potential impacts to the Five Lakes Trail and the Granite Chief Wilderness area are addressed in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness," of the Draft EIS/EIR. Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," of the Draft EIS/EIR. Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

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3 REFERENCES

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Margalida, A., R. Heredia, M. Razin, and M. Hernandez. 2008. Sources of Variation in Mortality of the Bearded Vulture *Gypaetus barbatus* in Europe. *Bird Conservation International* 18:1–10.

PCAPCD. See Placer County Air Pollution Control District.

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SACOG. See Sacramento Area Council of Governments.

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- U.S. Environmental Protection Agency. 1980. AP-42 Emission Factors for Explosive Detonation, included in Chapter 13, Miscellaneous Sources.
- . 1998. AP-42: Compilation of Air Emission Factors, Section 11.9, Western Surface Coal Mining. Available: <https://www3.epa.gov/ttn/chief/ap42/ch11/final/c11s09.pdf>.