



June 9, 2018

Placer County Planning Department
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Tahoe National Forest, Truckee Ranger District
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Comments@squawalpinegondola-eis.com

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

Dear Ms. Herrington and Mr. Ilano:

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.

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.

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)

Contents

Alternatives selected for analysis (Section 2):	2
Visual Resources (Section 4.2):	3
Wilderness (Section 4.3):	11
Other NEPA/CEQA Sections, including Growth-Inducing (Section 5):	14
Transportation Impacts (Section 4.7):	16
Noise (Section 4.9):	20
Recreation (Section 4.1):	21
Air Quality (Section 4.10):	22
Greenhouse Gas Emissions (Section 4.11):	23
Public safety - Emergency Evacuation (Section 4.6):	23
Wildlife (Section 4.14):	24
Other comments:	26

Alternatives selected for analysis (Section 2):

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:

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.

might include reduced visual impacts from numerous viewpoints in the vicinity of the Wilderness and elsewhere.

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:

- 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.

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.

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.

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.

Visual Resources (Section 4.2):

Presentation of data:

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?

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.

The way information is displayed should be improved for clarity in the FEIS/R.

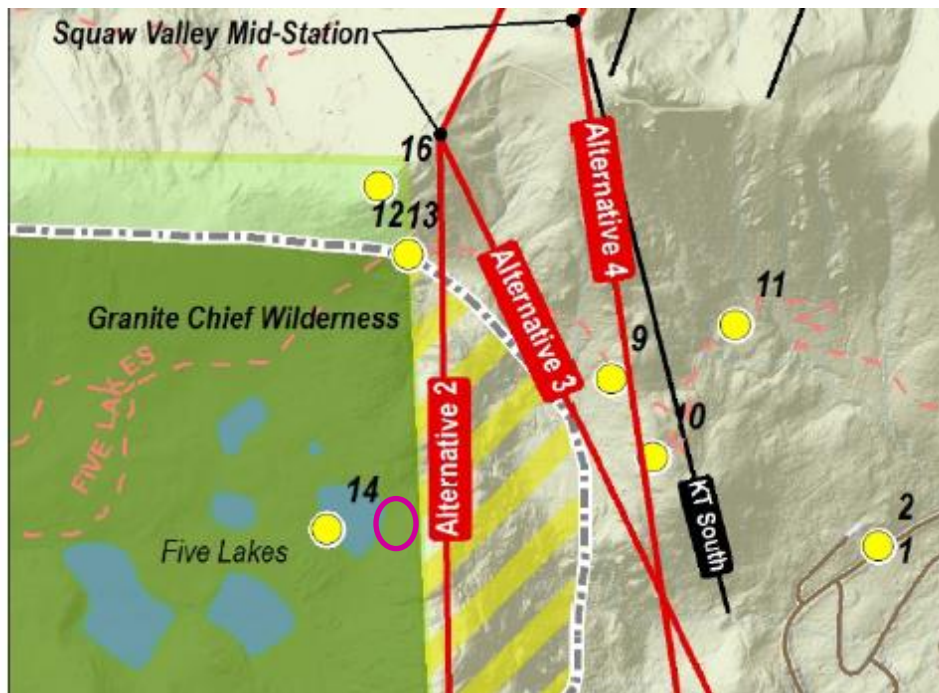
⁴ “Each alternative alignment considered includes specific technical or design challenges. For example, some issues include excessively steep terrain...” (p. 2-31)

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:



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.

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

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				NEPA	CEQA
	Adv = Adverse	B = Beneficial	LTS = Less than significant	N/A = Not applicable	NE = No effect	PS = Potentially significant	S = Significant	SU = Significant and unavoidable
4.2 Visual Resources								
Impact 4.2-1: Consistency with Federal, State, and Local Regulations	Alt 1, 3, 4 = NE Alt 2 = Adv		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, 3, 4 = NE Alts 2 = Mitigated	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, 3, 4 = 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

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:

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:

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)

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)

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:

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.

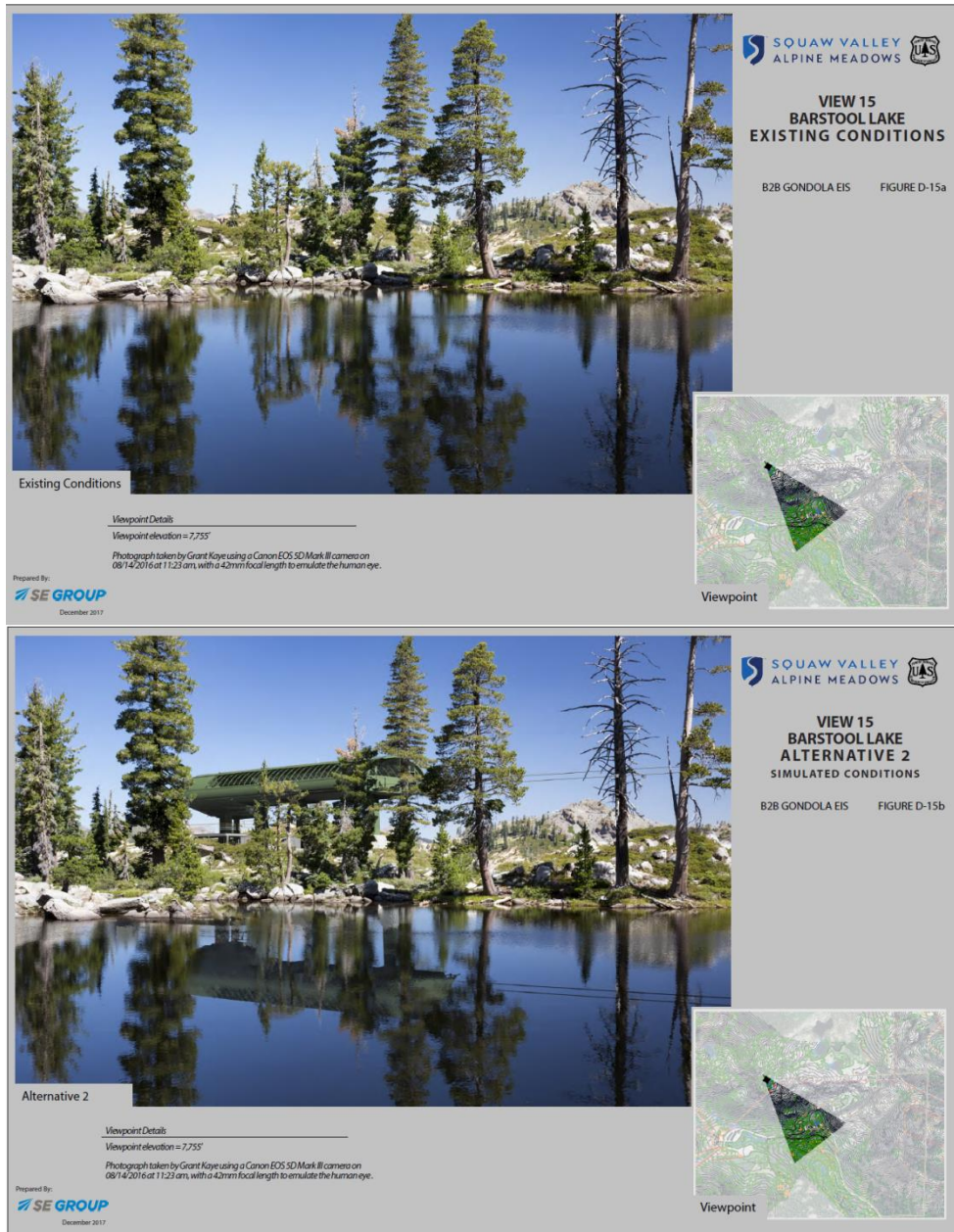
- The DEIS/R notes Alternative 2 would comply with the “Partial Retention VQO” applicable to the Alpine Meadows mid-station.¹⁴ Part of this conclusion is based on the statement that the gondola will remain “visually subordinate to the visible characteristic landscape” due to coloring and tree screening.¹⁵ 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



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.

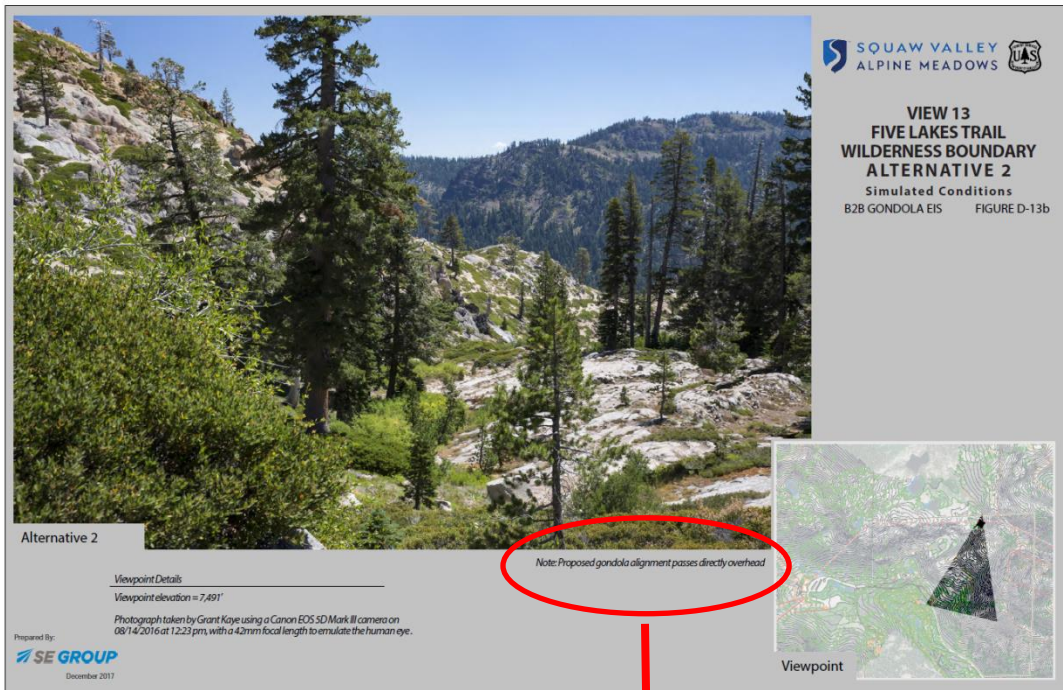
Viewpoint 13 impacts:

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,

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

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.



Note: Proposed gondola alignment passes directly 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)

Wilderness (Section 4.3):

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 = RPMs 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:

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)

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:

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:

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."

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:

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:

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)

Alternatives 2 and 3:

Effects on Opportunities for Solitude or Primitive and Unconfined Recreation

The DEIS/R concludes there will be “adverse” and “minorsly 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)

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)

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:

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)

- 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:

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:

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).

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)

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:

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

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:

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:

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)

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 TNF:

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.”

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:

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:

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

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:

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 previous discussed.

Public safety - Emergency Evacuation (Section 4.6):

All action alternatives:

Emergency evacuation:

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)

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:

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:

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"

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)

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

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 a 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.

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:

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:

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.