

SQUAW VALLEY MUTUAL WATER COMPANY

P.O. Box 2276

Olympic Valley, CA 96146

Phone: (530) 583-3674 www.SVMWC.com Fax: (530) 583-1257

Maywan Krach
Environmental Coordination Services
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

November 8, 2012

Dear Ms. Krach:

The Squaw Valley Mutual Water Company (“SVMWC”) received a copy of the notice of preparation (“NOP”) of a draft environmental impact report (“EIR”) for the proposed Village at Squaw Valley Specific Plan and Phase I Project (“project”). SVMWC provides the following comments to highlight issues that SVMWC believes the EIR must address during this California Environmental Quality Act (“CEQA”) review process. SVMWC’s concerns fall into five principal categories, as elaborated below: (1) hydrological studies; (2) water usage patterns and projections; (3) water sources; (4) water rights; and (5) cumulative impacts.

Regarding hydrological studies, SVMWC urges Placer County (“county”) to outline early in the EIR process the analyses that the county and project proponent will complete to provide sufficient background information for determining the project’s impacts on water resources. These studies should include consideration of the following concerns:

- Overall supply capacity of Squaw Valley’s groundwater basin and surface water bodies and seasonal variations in that capacity;
- Determination of the sustainable yield of Squaw Valley’s groundwater basin, and margins of safety to avoid groundwater depletion in multiple dry year scenarios
- Status of underground storage tanks and migration of subterranean pollution plumes through the basin;
- Location of any proposed new pump(s) that the project proponent will construct as a condition of developing the location of SVMWC’s current pumping stations and; determination of the feasibility of utilizing these proposed pump relocation sites (including the maintenance of water quantity, quality and reliability and the obtainment and location of easements for pipelines to connect to SVMWC’s existing system);
- Maintenance and potential enhancement of the flow rates in Squaw Creek, including an examination of creek sinuosity and its impact on the supply capacity and sustainability of the groundwater basin.

SQUAW VALLEY MUTUAL WATER COMPANY

P.O. Box 2276

Olympic Valley, CA 96146

Phone: (530) 583-3674 www.SVMWC.com Fax: (530) 583-1257

- Impacts of climate change on the availability of water, in both temporal and quantitative terms; and
- Integration of the Todd Engineering report with the results of ongoing hydrological studies, such as the joint University of Nevada, Reno and Lawrence Livermore National Laboratory's investigations.

Regarding water usage patterns and projections, the EIR must analyze and disclose the following:

- Current water usage in the basin, disaggregated by user and time of use;
- Overall anticipated water usage of the proposed project in its various stages of completion, including consideration of any fluctuations in use due to expected seasonal variations and specifically in multiple dry years;
- Comparison between current water usage and projected usage after project completion;
- Storage mechanisms (and their environmental impacts) to level out variability and differences in demand and supply; and
- Enforceable means to make the resort's operations maximally water-efficient.

Regarding water sources, SVMWC believes that the EIR must examine the following aspects of the project:

- Locations and sources inside or outside Squaw Valley from which the project will draw its supply;
- The quantity of water that the project will draw from each of these locations and sources;
- Required measures that will take effect if any of the anticipated water sources lacks sufficient supply for the resort's needs; and
- Accommodation of fluctuations and increased variability in supply that are likely to result from climate change-driven alterations in the availability of water in California, particularly in the Sierra Nevada as snowpack decreases over time and hydrographs change in both the timing and amount of flows.

Regarding water rights, the EIR must consider the superiority of existing Squaw Valley water users' rights vis-à-vis any new users. The EIR must, therefore, examine how the project proponent will ensure respect for existing users' water rights, including the rights of SVMWC, in times of water shortage. Any such shortages in supply should not be shared pro rata with all basin users; the superior rights of SVMWC and other users must be satisfied in full before new users receive any portion of the available supply within Squaw Valley. The EIR must identify measures to ensure respect for these superior rights and must contain

SQUAW VALLEY MUTUAL WATER COMPANY

P.O. Box 2276

Olympic Valley, CA 96146

Phone: (530) 583-3674 www.SVMWC.com Fax: (530) 583-1257

contingency plans that the project will implement when the available supply is insufficient for all users. The county should also, to the extent possible, quantify water rights in the basin to understand the scope of senior users' rights.

Regarding cumulative impacts, the EIR must investigate other planned development projects in Squaw Valley to determine whether impacts to water resources will be cumulatively significant in light of these other projects. The county should identify the likely scale of any such anticipated developments and analyze whether the available water resources can accommodate them. Any insufficiency should result in additional mitigation measures to be implemented by the project proponent.

The abovementioned issues reflect SVMWC's concerns about the massive scale of the proposed project and its impacts on Squaw Valley's water resources. SVMWC believes that the CEQA process will provide a vehicle for analysis of these various concerns, and SVMWC looks forward to engaging in this process to help produce an EIR that will address the needs and rights of existing Squaw Valley residents and water users while also protecting Squaw Valley's environment and appropriately accommodating new users.

Thank you for your attention to these issues.

Sincerely,



Tim Mattheis – Board member, SVMWC

For:

John Johnson
President, SVMWC