

Attachment 2

Tahoe-Sierra IRWM Plan Update

Draft-Final Comment Tracking Table

<u>Row #</u>	<u>Commenter</u>	<u>Section</u>	<u>Comment</u>	<u>Response</u>
1	Lynn Nolan, STPUD	4	Section 4---Climate Change....I know that we didn't get into this too deeply while setting our goals and objectives, but do you feel like this brief discussion about gathering up plans will actually meet the state's criteria for addressing climate change? Maybe we need a bit more verbage about it in here...can we talk about it with the subcommittee?	Section meets requirements for addressing climate change adaptation; however will add reference to Climate Change Vulnerability Assessment/Prioritization. Addressing emission reductions is not listed in the Plan Review Checklist
2	Lynn Nolan, STPUD	8	Page 8-1while listing the guidelines governance structure, some have * after them but no explanation that I can find for why they are starred	Change made. The * will be removed along with the paragraph after the list.
3	Sarah Green, Alpine County	8	Section 8.2 - I don't think I saw anything about the Leadership Team. Did that idea get dropped? I see it under 9.1.1 but thought it was originally described under governance.	No changes made. Leadership Team concept discussed in section 8.2.2.
4	Isaac Silverman, Sierra Watch	6	Opposes the inclusion of project #60.	No changes made. Project list was vetted by Partnership.
5	Curtis Ailing, Ascent	ES	{At Plan Goal #1} It would be important to include Lake Tahoe clarity as a key water quality objective, because it drives many planning and environmental decisions in the region. (I know this plan is not Tahoe-focused, but lake clarity is still one of the important goals.)	No changes made. Project goals and objectives were vetted by Partnership.
6	Brent Wolfe, NHC	2	{at 2.9.2.3} Echo Lake and Fallen Leaf Lake both have small dams. Like Tahoe, those dams just raise the water level above the natural rim of the lake.	Language added.
7	Kristen Stoner, Ascent	5	{at 5.2.3.1} Could include discussion to consider incorporating energy recapture (in-conduit hydro, co-generation) and distributed energy storage systems. Encourage local utilities to apply for eligibility for the CPUC's Self-Generation Incentive Program (SGIP) so that projects may be eligible for rebates. (TSAC p. 4-14)	Language added. Will include plans for proposed projects with GHG reduction.

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8	JoAnn Anders, Town of Truckee	Ack	On the Acknowledgements page – The Regional Water management Group of the Tahoe Sierra IRWM. Shouldn't this acknowledgement be to the Partnership of the TS IRWM?	Change made.
9	JoAnn Anders, Town of Truckee	ES	On page ES-12, last paragraph – states the Partnership (TS IRWM) may provide in-kind services to the RWMG. I think this is backwards, shouldn't it say the RWMG may provide in-kind support to the Partnership?	text is “Members of the Partnership may provide in-kind services to fulfill the roles of the RWMG and administrative support.” Changed “RWMG” to LT; with parallel change in §8.
10	JoAnn Anders, Town of Truckee	ES	Page ES-12, last line – RWMG should be Partnership.	Changed (no parallel sentence in §8)
11	Lynn Nolan, STPUD	ES	Page ES9....Table ES-2 project Summary...Project Type has a little (a) after the title, but I can't seem to find the reference for the (a) so if we could put that in somewhere explaining what the R, SW and W stand for...and maybe put it WW for wastewater?	Footnote added from §6 tables
12	Lynn Nolan, STPUD	5	Section 5, page 5-5, 5.2.4.3....recycled water use...talk about the restrictions on its use in the basin?	Added language: “use of recycled water within the Lake Tahoe Basin is prohibited with few exceptions by the Porter-Cologne Act”
13	Lynn Nolan, STPUD	6	Page 6-9, STPUD's project Iroquois Pond, is listed at 7.5M and is actually only \$266,250 (p.s. love the new tables, much easier to read)	Corrections to tables made.

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14	Sarah Green, Alpine County	2	page 2-11 - I believe the 2010 census data for Alpine is <u>incorrect</u> . I just did a check on the census website and it's 1,175.	No changes made; 1,175 is the 2010 population for the entire county; 726 is the estimated 2010 population for the portion of the county that is in the Region.
15	Sarah Green, Alpine County	3	Appendix 3-A - I believe Alpine County has a Groundwater Management Plan. Shall I confirm that and get back to you?	Language added to sections 2 & 3 from GWMP info.
16	Sarah Green, Alpine County	3	Appendix 3-A - Under "other documents", I'd like to see the Upper Carson River Watershed Stream Corridor Condition Assessment .Here is a link to the doc - http://ndep.nv.gov/bwgp/file/upper_carson_covertoc_1004.pdf	Added to appendix & references.
17	Sarah Green, Alpine County	6	Table 6-4 - Alpine County's Markleeville Creek Restoration Project should be on that list. It should be on Lynn's scoring sheet. It should also be included then in the Appendix Tables 6B	Project #22 is in Table 6-2 and 6B-2 as a Restoration project
18	Brent Wolfe, NHC	ES	{at Table ES-1} Table doesn't summarize the complete analyses in Section 5 related to the applicability of these RMS to the Region. The ones deemed not applicable are in italics here. But you qualitatively ranked all these RMS in Section 5 as: not applicable; limited applicability; applicable, and highly applicable. Seems that a table that presented the RMS within those categories would be more meaningful and better summarize the work done to evaluate relative to the Region. (Same comment for table in Section 5 of main report).	No change made, Partnership didn't want to prioritize the objectives so assuming they don't want to highlight the qualitative assessment of applicability in the narrative.

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19	Brent Wolfe, NHC	ES	{at ¶3 of§6 summary) Unclear statement. Are you implying that the reader should be aware that the list will change over time? Looks like Section 6 says the list gets updated every 2 years.	Yes. Text added: "as the list is expected to change over time as projects are completed and new project concepts added" No change made in §6 as there is discussion in that section about biennial updates.
20	Brent Wolfe, NHC	ES	{at table ES-2} Does this imply an overall ranking based on the scoring system referenced above?	No, identification #, not ranking. No change made.
21	Brent Wolfe, NHC	ES	{at table ES-2} I can infer from the text above what these abbreviations mean, but there is no legend or key that describes what these abbreviations mean for Project Type.	Footnote added from §6 tables
22	Brent Wolfe, NHC	ES	{at Project #2} Think this should be "SW" if its BMP implementation.	No change made; project is "R" per information form.
23	Brent Wolfe, NHC	ES	Abbreviation not previously defined. Think this is the Regional Water Management Group?	Yes. Changed to spell out abbreviation.
24	Curtis Ailing, Ascent	ES	{at ¶15 of§2 summary) this is an important point. Water quality is protected by non-degradation standards as a result of this designation. ADDED: "Notwithstanding the decline in clarity, Lake Tahoe is designated an Outstanding National Resource Water by the U.S. Environmental Protection Agency."	Accept added text
25	Curtis Ailing, Ascent	ES	ADDED: "from 102.4 feet of visible depth to 75.3 feet" to Lake Tahoe clarity sentence	Accept added text

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26	Brent Wolfe, NHC	1	I'm not aware of quagga muscles occurring in the Region. There is a major ongoing effort to keep them out with the boat inspection program, especially out of Lake Tahoe.	Text revised to remove quagga muscles and add curly pondweed (change to list of aquatic invasive species that are present and are the focus of control programs.
27	Curtis Ailing, Ascent	2	{at §2.7 climate change subsection mention of Cal-Adapt.org} Good	no change made
28	Brent Wolfe, NHC	2	{at §2.7 "Cal-adapt} Global change please, as a proper name.	Changed all occurrences to "Cal-Adapt"
29	Brent Wolfe, NHC	2	{at §2.8.3 Truckee River, gw basins} Is one of these numbers a typo? 20 times difference in capacity relative to estimated storage?	No changes made. Confirmed that the #'s match what's in DWRs Bulletin 118.
30	Brent Wolfe, NHC; Curtis Ailing, Ascent	2	{at §2.9.1.2 paragraph 2} (both commenters offered a revision of the same sentence)	Accepting change made by Brent Wolfe
31	Curtis Ailing, Ascent	2	{at §2.13.1 Climate Change mention of Sustainability Action Plan} good	no change made
32	Kristen Stoner, Ascent	2	{at §2.13.1 Climate Change mention of Sustainability Action Plan} Community health vulnerabilities have been added from Ch. 5 of the TSAP that were left out of this list.	Accepting additions to the list of vulnerabilities per the TSAP
33	Kristen Stoner, Ascent	2	ADDED: More frequent warm storm events will increase excessive amounts of runoff, which can threaten water quality of Lake Tahoe	Accepting change made by Kristen Stoner with modification of wording.

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34	Curtis Ailing, Ascent	2-D	{at 8.6 in prioritization list} Please clarify how this is vulnerability. I made a suggestion. Is this correct?	The checklist item is “Does your region include one or more of the habitats described in the Endangered Species Coalition’s Top 10 habitats vulnerable to climate change” Not accepting suggested change, but revising text in list.
35	Curtis Ailing, Ascent	2-D	ADDED: The U.S. Forest Service and other land management agencies are actively pursuing fire fuel management actions; however, much of the forest in the Region still needs treatment.	Accepting change
36	Curtis Ailing, Ascent	2-D	Good. Also, please add a comment on the status of TMDL adoption here.	No change made
37	Curtis Ailing, Ascent	2-D	ADDED: TRPA, state agencies, and local agencies have implemented and are planning several river and wetland restoration projects to help reduce fine and suspended sediment volumes reaching Lake Tahoe.	Accepting change
38	Curtis Ailing, Kristen Stoner, Ascent	3	(no comments, minor changes)	Accepting changes
39	Kristen Stoner, Ascent	4	{at MPT WQ5.1} The TSAP provides incentives to prohibit development in SEZs and 100-yr floodplain.(p. 5-23 of TSAP): Prohibit development within the 100-year flood plain and evaluate on an ongoing basis, as data is available, how the 100-year flood plain may change over time under new precipitation patterns and warmer storms. Provide transfer incentives to remove public and private development from Stream Environment Zones (SEZs) and 100-year flood plains to reduce drainage problems and damage to public and private property. Require property owners and developers to dedicate land within 100- year floodplains, conservation easements, and SEZs to the jurisdiction or other designated entity when a development project is approved.	No changes made. Objectives were vetted by Partnership.

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40	Kristen Stoner, Ascent	4	{at WQ6} What about consideration of alternative energy generation and distribution approaches for wastewater (see actions discussed on p. 4-14 of TSAC)? Granted, these may not result in water-related benefits.	No changes made. Objectives were vetted by Partnership. Consider adding to future updates of the Plan.
41	Kristen Stoner, Ascent	4	{at WS3} What about enforcement of requirements for new construction to implement CalGreen Water Efficiency measures (in California) or equivalent (in Nevada) within building codes. Incorporate water efficiency measures into the Green Building Ordinance. (p.4-24 of the TSAP for details).	No changes made. Objectives were vetted by Partnership. Enforcement practices would fall under MPT WS3.1.
42	Kristen Stoner, Ascent	4	{at GMW1} The TSAC (p. 5-19) recommends research of groundwater vulnerabilities associated with altered hydrologic conditions and investigating methods to maximize groundwater recharge.	No changes made. Objectives were vetted by Partnership. Research falls under IRWM1 and there are several projects in the Plan involving research into improving groundwater recharge.
43	Kristen Stoner, Ascent	4	{at ER3} This may be a good place to add that the combined effects of climate change and increased wildfire are expected to impair forest health and encourage invasive species (examples provided on p. 5-14 of TSAC)	Adding language to first sentence of the paragraph “especially considering the potential increases in fire risk in the future related to climate change”
44	Curtis Ailing, Ascent	4	{at IWM5} ADDED: , wildfire hazard	Rejecting change. Objectives were vetted by Partnership. Consider adding to future updates of the Plan.

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45	Kristen Stoner, Ascent	5	{at 5.2.1.2} Recommend mentioning the need to prepare for increased water supply variability as a result of climate change (discussed in TSAP)	Adding language: "Due to the climate change vulnerabilities in the Region, this strategy can help all water suppliers to adapt to the potential effects of climate change, especially increased water supply variability."
46	Kristen Stoner, Ascent	5	{at 5.2.6.5} TSAP recommendation: "Research groundwater vulnerabilities associated with altered hydrologic conditions and investigate methods to maximize groundwater recharge." (p. 5-19)	No changes made.
47	Kristen Stoner, Ascent	7	(no comments, minor changes)	Accepting changes

Note: This table summarizes comments and significant changes made by commenters. Minor changes to punctuation, wording, etc. made in the text are not listed here.



Sierra Watch
408 Broad Street #12
Nevada City, CA 95959

June 27, 2014

Araceli Cazarez, P.E.
Kennedy/Jenks Consultants
10850 Gold Center Drive, Suite 350
Rancho Cordova, CA 95670

Dear Ms. Cazarez,

Thank you for the opportunity to comment on the Draft Tahoe Sierra Integrated Regional Water Management Plan.

Sierra Watch is committed to protecting water as an immeasurably important natural resource in the region and to ensuring that growth-inducing infrastructure improvements do not encourage development that could outstrip local supplies.

The focus of these comments is the proposed Redundant Water Supply (Project 60), submitted by Squaw Valley Public Service District.

Summary

Sierra Watch opposes the inclusion of Project 60 in the Tahoe Sierra Integrated Regional Water Management Plan.

Project 60 would fund the construction of a 2,000,000 gallon water storage tank to serve as a pipeline terminal to facilitate export of water from Martis Valley to Squaw Valley and the environmental studies to pursue permits for the pipeline itself.

As proposed, the project could potentially apply state funding to subsidize private resort development. It would fund a water export project justified by prior studies that conflict with the Public Service District's own newly released Water Supply Assessment and it significantly mischaracterizes the project's compliance with the

Tahoe Sierra Integrated Regional Water Management Plan’s environmental objectives.

Project 60 seeks public money to improperly subsidize private resort development in Squaw Valley

In November 2010, Denver based private equity firm KSL Capital Partners purchased Squaw Valley and, in December 2011, submitted an application to Placer County for its “Village at Squaw Valley Specific Plan.”

Although this plan has been revised multiple times over the ensuing years, the version currently undergoing environmental review proposes an additional 1,757 bedrooms, with 196,083 square feet of commercial space, Also proposed is an indoor amusement park that would be permitted for a variety of water based facilities and activities including: stand up paddleboarding, wake boarding, water skiing, four different kinds of swimming pools, water slides, a wave pool, and two different types of artificial rivers.¹

According to the scientific literature relied upon in Project 60 to justify the need for supplemental and redundant water from the Martis Valley aquifer, water demands for a twenty year build-out, including the Village at Squaw Valley proposal, would require an assumed additional 1,210 acre feet per year of water.² Meanwhile, the Village at Squaw Valley Specific Plan includes the construction of a 700,000 to 1,500,000 gallon water storage tank to meet peak water demand.³

As a result it is clear that both of Project 60’s goals, constructing a large surface water storage tank and acquiring additional water supplies from the Martis Valley aquifer, would serve the expansion of the Village at Squaw Valley currently under consideration by Placer County. Accordingly, including this project in the Integrated Regional Water Management Plan would be an improper endorsement of the use of public money for a private development project.

¹ The Village at Squaw Valley Specific Plan, Jan 2014 at 3-8 and 3-13. Available at: <http://www.placer.ca.gov/~media/cdr/Planning/SpecificPlans/VillageAtSquawValley/Jan2014Update/Ch3LandUse.pdf> accessed June 26, 2014.

² Redundant Water Supply, Squaw Valley Public Service District, Mike Geary at3. Available at: http://tahoesierrairwm.com/wp-content/uploads/2013/12/60_Sq_Valley_PSD_Redundant_wtr_supply.pdf accessed June 26, 2014.

³ Revised Notice of Preparation of a Draft Environmental Impact Report for the Proposed Village at Squaw Valley Specific Plan at 9, Placer County, February 21, 2014. Available at: http://www.placer.ca.gov/~media/cdr/Planning/SpecificPlans/VillageAtSquawValley/Squaw%20Revised%20NOP%202-20-14_smaller%20file.pdf accessed June 27, 2014.

The Project 60 proposal is based on scientific studies that have since been contradicted by the Squaw Valley Public Service District’s own Draft Water Supply Assessment

A primary justification for Project 60 is the need for redundant and supplemental water supplies in order to provide sufficient and reliable drinking water over the next twenty years.⁴ The project purports to meet the following Plan Objectives:

- Water Supply 1 - Provide water supply to meet projected demands for a twenty year planning horizon,
- Water Supply 2 - Operate and maintain, build, or replace infrastructure to reliably supply water,
- Ground Water Management 1 - Maintain and monitor groundwater supply to assure future reliability, and
- Ground Water Management 3 - “manage groundwater for multiple uses (e.g. municipal/industrial/agricultural supply and environmental use).”⁵

The explanations for how the project meets these criteria repeatedly state that the project would provide both redundant and supplemental water supplies, as much as 1,210 acre feet per year, to satisfy these various objectives.⁶ Additionally, Project 60 claims that it would “reduce[] or eliminate[] the need to treat future groundwater suppl[ies].”⁷

However, since submitting this application, the Squaw Valley Public Service District has completed a Draft Water Supply Assessment for the Village at Squaw Valley. This assessment purports to show that there is sufficient water supply to meet all water demands in Squaw Valley through 2040 without importing or treating any water.⁸ Specifically it claims that “The Olympic Valley Groundwater Basin has sufficient supply to meet the needs of the Project, in addition to the existing and planned future uses in the Olympic valley over the next 25 years in normal, single, and multiple dry years.”⁹ Sierra Watch has engaged water

⁴ Redundant Water Supply, Squaw Valley Public Service District at 3. Available at: http://tahoesierrairwm.com/wp-content/uploads/2013/12/60_Sq_Valley_PSD_Redundant_wtr_supply.pdf accessed June 26, 2014.

⁵ Id. at 3,4.

⁶ Id.

⁷ Id. at 7.

⁸ Draft Village at Squaw Valley Specific Plan water Supply Assessment, prepared by Farr West Engineering, Hydrometrics WRI, and Todd Groundwater for Squaw Valley Public Service District and Placer County June 17, 2014. Available at: http://www.svpsd.org/pdffiles/Agenda%20Package/J-Final_Draft_WSA_6-18-14.pdf accessed June 26, 2014.

⁹ Id. at 8-2.

management experts who are currently undertaking a detailed evaluation of the Draft Water Supply Assessment's methodology and conclusions.

Surely, the water district cannot have it both ways. Either there is enough water in Squaw Valley or there isn't. Either a sufficient and safe drinking water supply requires a pipeline to Martis Valley or it doesn't. In any event, until this apparent contradiction is resolved, or at the very least acknowledged in the project description, it would be inappropriate to include Project 60 in the Tahoe Sierra Integrated Water Management Plan.

The Project 60 proposal overstates environmental benefits and compliance with the Integrated Regional Water Management Plan's stated environmental objectives

Project 60 claims to meet multiple plan objectives related to environmental values. These environmental benefits appear largely illusory. It also fails to identify areas where the project would likely conflict with other environmental plan objectives.

Project 60 states that it meets Plan Objective Ecosystem Restoration 1, to "enhance and restore water bodies, wetlands, riparian areas and associated uplands to support healthy watersheds, viable native fish, wildlife and plant habitats."¹⁰ It would achieve this by promoting reduced groundwater pumping in Squaw Valley that would in turn increase streamflows in Squaw Creek. However, the project proposal states that imported water would merely be redundant and supplemental. It is difficult to understand how supplemental or redundant water supplies would reduce groundwater pumping from current levels. This benefit is speculative at best.

Meanwhile, the proposal fails to consider the environmental impacts of running an eight-mile pipeline along and across the Truckee River or potential streamflow impacts to Martis Creek and other surface waters receiving discharge from the Martis Valley aquifer. As a result, it seems highly unlikely that a water export project of this scale would result in net positive impacts for the environmental values specified in Plan Objective Ecosystem Restoration 1.

Project 60 also claims that Plan Objective Ecosystem Restoration 4 "minimize ecosystem impacts caused by existing and new development" does not apply.¹¹ Due to the growth inducing effects of importing water supplies to Squaw Valley,

¹⁰ Redundant Water Supply, Squaw Valley Public Service District at 4. Available at: http://tahoesierrairwm.com/wp-content/uploads/2013/12/60_Sq_Valley_PSD_Redundant_wtr_supply.pdf accessed June 26, 2014.

¹¹ Id. at 5, 7.

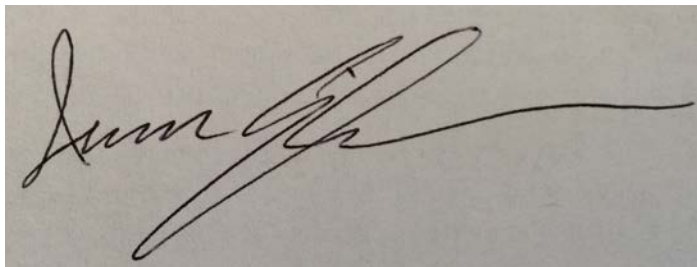
Project 60 would, in all likelihood, increase ecosystem impacts caused by new development.

Finally, Project 60 claims greenhouse gas reductions. This benefit is based on a desire to route a natural gas pipeline in the same utility corridor as the water line and the belief that fuel switching from propane to cleaner natural gas would reduce emissions. Although this is a potential benefit, it fails to mention the direct greenhouse gas emissions associated with pumping and transporting water from distant well fields or the indirect emissions from traffic and energy use associated with induced growth. On balance, it appears much more likely that Project 60 would increase greenhouse gas emissions, not reduce them.

Conclusion

Project 60 would be growth inducing and potentially utilize state money to subsidize private resort development. Project 60's compliance with the Tahoe Sierra Integrated Water Management Plan is based on technical analyses that are contradicted by the district's own water supply assessment, overstated and illusory environmental benefits, and silence regarding many of the project's probable and negative environmental effects. Sierra Watch opposes including the Squaw Valley Public Service District's Redundant Water Supply (Project 60) in the Tahoe Sierra Integrated Regional Water Management Plan.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read 'Isaac Silverman'. The ink is dark and the handwriting is fluid.

Isaac Silverman
Staff Attorney