EXHIBIT 1

Before the Board of Supervisors
County of Placer, State of California

In the matter of: A RESOLUTION CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT AND ERRATA FOR THE MARTIS VALLEY WEST PARCEL SPECIFIC PLAN AND RELATED ENTITLEMENTS ADOPTING FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS AND A MITIGATION MONITORING REPORTING PLAN.

Resolution No. 2016-____

The following resolution was duly passed by the Board of Supervisors of the County of Placer at a regular meeting held _____, 2016, by the following vote:

Ayes:

Noes:

Absent:

Signed by me after its passage.

_____
Robert Weygandt, Chair
Board of Supervisors

Attest:

_____
Clerk of said Board

WHEREAS, the County of Placer acting as lead agency pursuant to the California Environmental Quality Act ("CEQA") prepared an environmental impact report for the following:

1. Amendments to the Martis Valley Community Plan;
2. Martis Valley West Parcel Specific Plan;

3. Martis Valley West Parcel Specific Plan Development Standards and Design Guidelines;

4. Rezoning of certain properties within the Martis Valley West Parcel Specific Plan;

5. Tentative immediate rezone of 662± acres of the "West Parcel" of the Martis Valley West Parcel Specific Plan from TPZ (Timber Production Zone) to SPL-MVWPSP (Specific Plan – Martis Valley West Parcel Specific Plan);

6. Large Lot Vesting Tentative Subdivision Map;

7. Martis Valley West Parcel Specific Plan Water Supply Assessment; and

8. Development Agreement.

(Hereinafter collectively referred to as "Project Approvals".)

WHEREAS, the Project Approvals constitute the "Project" for purposes of the California Environmental Quality Act ("CEQA"--Public Resources Code sections 21000 et seq.) and CEQA Guidelines Sec. 15378 and these determinations of the Board, and

WHEREAS, a notice of preparation for an environmental impact report for the Project was prepared by the County and sent to the State Clearinghouse on March 28, 2014, under the title "Martis Valley West Parcel Specific Plan" and a revised notice of preparation was prepared by the County and sent to the State Clearinghouse on February 27, 2015, under the title "Martis Valley West Parcel Specific Plan" (SCH No. 2014032087), and

WHEREAS, on October 22, 2015, the County released a draft environmental impact report ("DEIR") that was prepared for the Project under the direction of the County, and

WHEREAS, the DEIR was made available for public comment in accordance with CEQA from October 22, 2015 through December 7, 2015, and

WHEREAS, the County received written comments on the DEIR, in response to which the County prepared and released a Final Environmental Impact Report on May 3, 2016, (the "FEIR"), and

WHEREAS, on June 9, 2016 and July 7, 2016, the County Planning Commission considered the FEIR and an Errata ("hereinafter referred to as "FEIR and Errata") and on July 7, 2016, recommended against certification of the same, and against adoption of the Findings of Fact and Statement of Overriding Considerations and the Mitigation Monitoring and Reporting Program, and

WHEREAS, the Board gave full and legal notice of a public hearing to consider and act upon the Project Approvals and the FEIR and Errata, which was held on September 13, 2016, and

WHEREAS, on September 13, 2016, the Board closed the public hearing to further public testimony, rejected the Planning Commission's recommendation and took tentative action to certify the FEIR and Errata, adopt the Findings of Fact and Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program for the Project Approvals, and

WHEREAS, the Board found the FEIR and Errata to be adequate and complete and based that finding on its review of the record, including consideration of all written and oral comments, including those comment letters submitted after release of the FEIR. Upon review of those comment letters, as well as all comment letters submitted on the FEIR, the Board finds there is no evidence of "new information" as such term is defined in CEQA Guidelines Section 15088.5 to require the FEIR and Errata to be recirculated prior to the Board's action as outlined in this resolution. This decision is based on substantial evidence in the administrative record, including but not limited to the responses to comments contained in the FEIR, the responses set forth in the record by staff and the County's environmental consultant on the comments submitted after release of the FEIR and all documents and testimony considered by the Board in rendering its decision herein, and

WHEREAS, the Board also concluded the benefits of the Project, in particular the conservation of over 6,300 acres as open space on the East Parcel, the reduction in units from 1360 to 760, the additional financial contributions to transit and construction of workforce housing units, overrode the significant and unavoidable impacts of the Project, and

WHEREAS, on _____, 2016, the Board took final action to certify the FEIR and Errata, adopt the Findings of Fact and Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program for the Project, and approve the Water Supply Assessment, and

WHEREAS, the Board has duly considered the FEIR and Errata for the Project, which consists of the DEIR and the Final EIR and Errata, the appendices thereto, including but not limited to the Water Supply Assessment (Appendix N), the comments of the public, both oral and written, and all written materials in the record connected therewith, and is fully informed thereon.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF SUPERVISORS OF THE COUNTY OF PLACER:

(1) The FEIR and Errata have been prepared in accordance with all requirements of CEQA and the Guidelines.

(2) The FEIR and Errata were presented to and reviewed by the Board. The FEIR was prepared under supervision by the County and reflects the independent judgment of the County. The Board has reviewed the FEIR, and bases its findings on such review and other substantial evidence in the record.

(3) The Board hereby certifies the FEIR and Errata as complete, adequate and in full compliance with CEQA as a basis for considering and acting upon the Project Approvals and, exercising its independent judgment.

(4) The Board has considered and hereby adopts the "Findings of Fact" as set forth in Exhibit A, attached hereto and incorporated herein by reference.

(5) The Board hereby adopts the Mitigation Monitoring and Reporting Plan ("MMRP") prepared for the Project Approvals and as set forth in Exhibit B and incorporated herein by reference. All mitigation measures proposed in the FEIR shall be implemented, and the MMRP will implement all mitigation measures adopted with respect to the Plan pursuant to all of the Project Approvals. The MMRP is hereby incorporated into the Plan and thereby becomes part of and limitations upon the entitlements conferred by the Project Approvals.

(6) The Board hereby approves the Water Supply Assessment, attached as Appendix N to the DEIR and version copy of which iss set forth in Exhibit C and incorporated herein by reference, and hereby finds that the Water Supply Assessment is adequate and was prepared in accordance with CEQA Guidelines Section 15155, State Water Code Sections 10910(b), 10912(b) and 10912(c) and Government Code Section 66473.7. The Water Supply Assessment demonstrates that the total projected water supplies, determined to be available for the Project during normal, single dry and multiple dry water years, will be sufficient to satisfy the demands of the Project, in addition to existing and planned future uses. The Board bases these conclusions on substantial evidence in the record.

BE IT FURTHER RESOLVED: That notwithstanding the imposition of the mitigation measures in the MMRP as set forth above, significant impacts of the Project have not been reduced to a level of insignificance or eliminated by changes in the proposed Project. The Board of Supervisors finds that the Project will bring substantial benefits to the County and that the Project's benefits, particularly towards the conservation of a significant amount of open space, outweigh the Project's significant unmitigated adverse impacts and pursuant to CEQA Guidelines section 15093 adopts and makes the Statement of Overriding Considerations as set forth in Section X of Exhibit A, attached hereto and incorporated herein by reference, to explain why the Plan's benefits override its unavoidable impacts. Having carefully considered the Plan, its impacts and the foregoing benefits, the Board of Supervisors finds, in light of the important social, economic and other benefits that the Project will bring, the adverse environmental impacts of the Project that are not fully mitigated are acceptable.

BE IT FURTHER RESOLVED: That the Planning Services Division is directed to file a Notice of Determination with the County Clerk within five (5) working days in accordance with Public Resources Code section 21152(a) and CEQA Guidelines section 15094.

EXHIBIT A

CEQA FINDINGS OF FACT

and

STATEMENT OF OVERRIDING CONSIDERATIONS

OF THE PLACER COUNTY BOARD OF SUPERVISORS

for the

MARTIS VALLEY WEST PARCEL SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

October 11, 2016

I. INTRODUCTION

On May 3, 2016, the final environmental impact report (EIR) prepared on behalf of Placer County (County) was released. Pursuant to Public Resources Code section 21081, the County, acting through its Board of Supervisors, adopts the following findings for the Martis Valley West Parcel Specific Plan (the Project) in accordance with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.).

This document is organized as follows:

Section I provides an introduction to these findings.

Section II provides a description of the Project proposed for adoption, the environmental review process for the Project, the approval actions to be taken and the location of records.

Section III describes the environmental review process for the Project, including public scoping and review of the Project.

Section IV identifies the Record of Proceedings for this matter, including the administrative record upon which the County's approval of the Project is based.

Section V provides general guidance regarding the County's adoption of these findings.

Section VI provides the County's findings with respect to the Project's potentially significant impacts. Attachment "A" to these findings is a table setting forth each mitigation measure adopted by the County in connection with its approval of the Project. Attachment A includes the full text of each mitigation measure adopted by the County. The mitigation measures that are identified as adopted in Attachment A are hereby adopted by the County. Section VI also addresses mitigation measures and project modifications proposed by commenters, and the County's findings with respect to these proposals.

Section VII adopts and incorporates the Mitigation Monitoring and Reporting Program ("MMRP") for the mitigation measures that have been proposed for adoption. A copy of the MMRP is attached as Section 4 to the Final EIR. In adopting these findings, the County hereby adopts and commits to implement the MMRP. The measures set forth in the MMRP represent binding commitments with which the project applicant must comply.

Section VIII sets forth the County's findings with respect to recirculation of the Draft EIR. Although formal findings are not required with respect to determinations whether to recirculate a draft EIR, the County nevertheless adopts these findings to provide information regarding how the County reached its conclusions with respect to recirculation. These findings are adopted pursuant to CEQA Guidelines section 15088.5.

Section IX sets forth the County's findings with respect to alternatives to the Proposed Project. These findings are adopted pursuant to Public Resources Code sections 21002 and 21081, subdivision (a)(3).

Section X sets forth the County's "statement of overriding considerations" concerning the Project. These findings are adopted pursuant to Public Resources Code section 21081, subdivision (b).

The findings and determinations contained herein are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the project and the EIR. The findings and determinations constitute the independent findings and determinations by the Placer County Board of Supervisors (Board of Supervisors) in all respects and are fully and completely supported by substantial

evidence in the record as a whole.

Although the findings below identify specific pages within the Draft EIR and Final EIR in support of various conclusions reached below, the Board of Supervisors incorporates by reference and adopts as its own, the reasoning set forth in both environmental documents, and thus relies on that reasoning, even where not specifically mentioned or cited below, in reaching the conclusions set forth below, except where additional evidence is specifically mentioned. This is especially true with respect to the County's approval of the mitigation measures recommended in the Final EIR, and the reasoning set forth in responses to comments in the Final EIR. The County further intends that if these findings fail to cross-reference or incorporate by reference any other part of these findings, any finding required or permitted to be made by the County with respect to any particular subject matter of the Project must be deemed made if it appears in any portion of these findings or findings elsewhere in the record.

Like the EIR itself, these findings use a number of acronyms. To make the findings easier to follow, key acronyms are defined at the end of this document. Although the findings define most such acronyms the first time they are introduced, the listing of acronyms is also provided as a means of identifying such terms. Where terms are defined in the body of these findings in a manner that differs from the list of acronyms at the end of these findings, the definition in the body of these findings shall prevail.

These Findings, along with the Statement of Overriding Considerations set forth in Section X, the table of findings set forth in Attachment A, and the Mitigation Monitoring and Reporting Program ("MMRP") set forth at chapter 4 to the Final EIR, are made with respect to the Project Approvals for the Project and state the findings of the Board of Supervisors relating to the potentially significant environmental effects of the Project in accordance with the Project Approvals. The following Findings, along with the Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program are hereby adopted by the Board of Supervisors as required by the California Environmental Quality Act, Public Resources Code Sections 21002, 21081, 21081.5 and 21081.6, and CEQA Guidelines sections 15091 through 15093.

II. PROJECT DESCRIPTION

The Martis Valley West Parcel Specific Plan ("MVWPSP") is a proposed Specific Plan that would establish a legislative and regulatory framework for the development of residential and commercial uses on a portion of the West Parcel and conservation of the East Parcel. The MVWPSP proposes a comprehensive set of goals and policies, project objectives and implementation measures to guide the development of the West Parcel. The Specific Plan would establish Development Standards for parcel layout, buildings and facilities, as well as Design Guidelines for architecture, landscaping and other project elements. The MVWPSP would also establish goals and policies for the preservation of the entire East Parcel as permanent open space.

The project would move the development potential assigned through the Martis Valley Community Plan from the East Parcel to the West Parcel, transferring 760 units and 6.6 acres of commercial from the allowable development of 1,360 units and 6.6 acres of commercial on the East Parcel to the West Parcel. The project would permanently retire the remaining 600 units. These findings have been prepared to comply with the requirements of the California Environmental Quality Act and the CEQA Guidelines.

See Chapter 3, Project Description, of the Draft EIR and Chapter 2, Revisions to the Draft EIR, of the Final EIR for a complete and detailed description of the Project. This includes figures, diagrams, and tables illustrating and describing the proposed Project. (Draft EIR, pp. 3-1 - 3-36 and Final EIR pp. 2-1 to 2-45.) The following text describes briefly the Project.

A. <u>Project Location</u>

The MVWPSP Project is located between the Town of Truckee and the north shore of Lake Tahoe in Placer County, on both sides of State Route (SR) 267. The entire Martis Valley encompasses approximately 44,800 acres in Nevada and Placer Counties, 25,570 acres of which are within Placer County. The proposed MVWPSP project has two components: the West Parcel (1,052 acres) and the East Parcel (6,376 acres), both privately owned. Of this total, 6,160 acres of the East Parcel are located within Placer County, including 130 acres that are located in the Tahoe Basin (in Placer County). Approximately 216 acres of the East Parcel are located within Nevada County.

The approximately 1,052-acre West Parcel is located north of Lake Tahoe, southeast of the Northstar California Resort, and uphill and east of Sawmill Reservoir. The West Parcel is undeveloped coniferous forest that is designated Forest in the Martis Valley Community Plan (MVCP) and is zoned Timberland Production Zone (TPZ). Similar in character to the West Parcel, the approximately 6,376-acre East Parcel is undeveloped coniferous forest land, primarily designated Forest and zoned TPZ. Approximately 670 acres of the East Parcel are designated Low Density Residential and General Commercial and zoned Single-Family Residential and Neighborhood Commercial in the MVCP. This zoning allows for development of up to 1,360 dwelling units and 6.6 acres of commercial on the East Parcel. (Final EIR, pp. 3-1 - 3-5.)

B. Project Overview

The project involves moving the development potential from the East Parcel to the West Parcel, transferring 760 units and 6.6 acres of commercial from the allowable development of 1,360 units and 6.6 acres of commercial on the East Parcel to the West Parcel. The project permanently retires the remaining 600 units. The entire East Parcel shall be permanently preserved as open space. The mechanism for preserving the East Parcel consists of either (1) the sale of the East Parcel to a land trust or similar organization, or (2) recordation of a conservation easement restricting its use. Development on the West Parcel will accommodate up to 760 residential units, accessory homeowner amenities (up to 22,000 square feet), and up to 6.6 acres (up to 34,500 square feet) of commercial uses, as well as the associated internal roads, a roadway connection to SR 267, an emergency vehicle access (EVA) route, utility connections, and supporting infrastructure.

Development pursuant to the MVWPSP will occur in phases, and is anticipated to be built out over approximately 20 years. Depending on market demand for various lodging types and non-residential uses and changes in the development goals or financial capabilities of property owners, development may evolve in a variety of ways. In general, the phasing plan has been structured to ensure that the improvements in each phase can support its respective development in compliance with County policies and standards, and that the development in each phase can support the portion of its costs for the required improvements. (Draft EIR, p. 3-33.) Therefore, the implementation measures are intended to ensure that development of the MVWPSP is comprehensive, coordinated, and responsive to changing circumstances and market conditions.

In addition to adoption of the MVWPSP, certification of the EIR, amendment of the MVCP land use diagram, and rezone of the East and West Parcels, a large lot tentative map is approved for financing and sale; however, the large lot tentative map conveys no development entitlements to the resulting parcels. The EIR is intended to serve as the base environmental document for subsequent entitlement approvals within the West Parcel. The determination of whether a requested subsequent development entitlement is consistent with the MVWPSP, and whether the EIR considered the project-specific effects, would be made by the County through the MVWPSP conformity review process to determine consistency with the adopted MVWPSP, CEQA, and other regulatory documents and guidelines. In acting to approve a subsequent project or permit, the County may impose reasonable and necessary conditions to ensure that the project is in compliance with the MVWPSP and all applicable plans, ordinances, and regulations. (Refer to Section 8.3 of the MVWPSP for additional details regarding the procedural steps of

implementing the Specific Plan.)

The approximately 216 acres of the East Parcel in Nevada County remains designated Forest 160 in the Nevada County General Plan. This acreage is not included in the MVWPSP, as it is within Nevada County and not under Placer County's jurisdiction; however, it is part of the overall proposed project analyzed in the EIR, in that it will be preserved as open space in perpetuity as part of the East Parcel. The project does not propose development or land use changes on the 216 acres, so no action is needed from Nevada County. Similarly, the approximately 130 acres of the East Parcel owned by Sierra Pacific Industries and located in Placer County and the Tahoe Basin is not included in the MVWPSP land use plan, as it is within the Tahoe Basin and under Placer County's and TRPA's jurisdiction, but it is part of the overall proposed project analyzed in the EIR. The project does not propose development or land use changes on the 130 acres co-located in the Tahoe Basin, so no action is required from TRPA.

C. Project Objectives

The purpose and objectives for the Project are as follows:

- Provide new residential development consistent with the vision, goals, and policies of the MVCP, particularly:
    - Conserve large, intact and interconnected areas of natural open space that contributes to the last remaining habitat linkages between the Sierra Nevada and Mount Rose Wilderness Area in the Carson Range (Policy 1.A.6).
    - Minimize habitat fragmentation by development and roads to protect open space from human encroachment (Policy 1.A.6).
    - Consider the regional implications of development in the Martis Valley on resources outside of the Valley (i.e., Truckee River, Lake Tahoe Basin, Carson Range, and Sierra Nevada) (Policy 1.A.7).
    - Ensure that long-term conservation of important resource lands is achieved through a combination of regulatory actions, acquisition of easements, and both public and private land acquisitions (Policy 1.A.8).
    - Encourage the concentration of multi-family housing in and near village centers and neighborhood commercial centers (Policy 1.B.1).
    - Encourage the planning and design of new residential subdivisions to emulate the best characteristics (e.g., form, scale, and general character) of existing, nearby neighborhoods (Policy 1.B.2).
    - Require residential land project design to reflect and consider natural features, noise exposure of residents, visibility of structures, circulation, access, and the relationship of the project to surrounding uses (Policy 1.B.4).
    - Require that significant natural, open space, and cultural resources be identified in advance of development and incorporated into site-specific development project design (Policy 1.B.9).
    - Identify available opportunities and designate land for small commercial centers where some of the needs of local area residents can be met, eliminating the need for trips outside the area (Policy 1.C.3).
    - Encourage the sustained productive use of forestland as a means of providing open space, maintaining the quality of Martis Valley's scenic vistas and to conserve other natural resources (Policy 1.F.1).
    - Encourage the preservation of timber producing lands as regional open space, and protect these areas from urban encroachment (Policy 1.J.1).
- Implement a density transfer and retirement by permanently retiring 600 East Parcel residential units and transferring 760 residential units and 6.6 acres of commercial uses from the East Parcel to the West Parcel while preserving in perpetuity 6,376 acres in conservation lands.

- Contribute to a large, continuous expanse of open space east of SR 267 by ensuring the permanent preservation of the East Parcel.
- Minimize isolated development that leads to fragmentation of open space and natural resources by developing on lands in proximity to existing development.
- Minimize visual impacts of development by using the natural features and terrain of the project site to screen buildings.
- Limit new infrastructure and disturbance by developing on lands in proximity to existing development.
- Enhance and maintain existing trail system and associated recreational uses, such as cross-country skiing, snowshoeing, hiking, and biking trails.
- Implement a land use plan that is responsive to community concerns, such as visual character, traffic management, parking availability, recreational facilities, environmental issues, and the desire for expanded community services and amenities.
- Reduce reliance on automobiles by providing onsite services and amenities, a transit stop, and extensive cross-country skiing, hiking, and biking trails.
- Develop a project that is consistent with the planning guidelines and principles of adopted plans and policies, particularly the MVCP.
- Create a development that draws upon the historic Sierra and Tahoe regional architectural traditions.
- Develop a financially sustainable project that does not require the diminishment of services to existing residents.
- Incorporate sustainable design concepts to ensure long-term preservation, the enhancement of resources, and the reduction of site impacts.
- Reinforce the North Lake Tahoe region, including the Martis Valley, as a four-season destination resort.

(Draft EIR, pp. 3-6 to 3-7, as revised in the Final EIR, p. 2-8.)

D. Discretionary Approvals

Project approval requires the County, as lead agency under CEQA, as well as certain "responsible agencies" to take various planning and regulatory actions to approve the overall Project. Described below are discretionary actions necessary to carry out the Project. (See also Table 3-8, MVWPSP Process and Required Permits and Authorizations, Final EIR, Response to Comment IO41-7.) In addition to the County's certification of the Final EIR and adoption of these Findings and Mitigation Monitoring and Reporting Program (CEQA requirements), the following discretionary actions and approvals are anticipated:

Expected Permits and Authorizations		
Agency	Permit/Authorization	Action Requiring Permit Approval or Review
Federal		
U.S. Fish and Wildlife Service	Section 7 Consultation (through the USFS review process)	Potential impacts to a federally listed species or its habitat
U.S. Army Corps of Engineers	Section 404 Permit	Potential impacts to jurisdictional wetlands or waters
State		
California Department of Fish and Wildlife	Section 1602 Streambed Alteration Agreement	Potential disturbance to the bed or bank of jurisdictional waters
	2081 Incidental Take Permit	Potential impacts to a state-listed species

Expected Permits and Authorizations		
Agency	**Permit/Authorization**	**Action Requiring Permit Approval or Review**
California Department of Forestry	Timber Harvest Plan Timber Conversion Permit	Harvesting of timber on private lands
California Board of Forestry (through CAL FIRE)	Approval of the immediate rezone from the Timberland Production Zone (TPZ)	Rezone lands from the Timberland Production Zone to SPL-MVWPSP
Lahontan Regional Water Quality Control Board	Section 401 Water Quality Certification	Potential impacts to state water quality; required when a federal permit is issued
	Board Order No. R6T-2007-0008 – Waiver of Waste Discharge Requirements Related to Timber Harvest and Vegetation Management Activities	Potential impacts to state water quality resulting from tree and vegetation removal activities
	Statewide Construction General Permit No. CAS000002 - Board Order No. WQO 2009-0009-DWQ	Discharges of stormwater runoff associated with construction activity involving land disturbance of 1 or more acres Stormwater Pollution Prevention Plan (SWPPP)
	Board Order No. R6T-2008-0023 – Renewed Waste Discharge Requirements and NPDES General Permit for Limited Threat Discharges to Surface Waters	Dewatering of excavations to surface waters (if overland discharge is not feasible)
California Department of Transportation (Caltrans)	Encroachment Permit	Construction, operation, and maintenance within, under, or over state highway rights-of-way
Local		
Placer County	Lead Agency under CEQA Legislative and Regulatory Authority for Project Entitlements	Requested changes in land uses and development entitlements for the MVWPSP area: Martis Valley Community Plan Land Use Diagram Amendment Martis Valley Community Plan Text Amendment MVWPSP adoption, including the adoption of the Development Standards and Design Guidelines Development Agreement Large Lot Tentative/Final Subdivision Map
Northern Sierra Air Quality Management District and Placer County Air Pollution Control District	Dust Control Plan Authority to Construct	Disturbance of more than 1 acre of topsoil Stationary sources
Local Agency Formation Commission (LAFCO)	Annexation Application	Annexation of the West Parcel development area into the NCSD service area
Northstar Community Services District	Annexation Application	Annexation of the West Parcel development area into the NCSD service area
Truckee Sanitary District (TSD)	Contract for Service	New Contract for services between NCSD and TSD required prior to LAFCO approval of the annexation of the West Parcel development area into the NCSD service area

Source: Compiled by Ascent Environmental, 2015.

III. ENVIRONMENTAL REVIEW PROCESS

In accordance with section 15082 of the CEQA Guidelines, the County prepared a Notice of Preparation (NOP) of an EIR, which was originally published on March 28, 2014. (Appendix A of the Draft EIR.) The NOP was distributed for a 30-day comment period concluding on April 28, 2014. The NOP was distributed to public agencies and interested individuals of the community, including residents within 1,000 feet of the Project area. Comments received on the NOP are contained in Appendix B to the EIR.

The County held agency and public scoping meetings on the proposed project on April 16, 2014, at the Cedar House Sport Hotel and at the North Tahoe event Center. The scoping meeting was an opportunity for agencies and the public to obtain information about the proposed project and to provide input regarding the issues they wanted addressed in the Draft EIR. Comments on the NOP received during the scoping meeting were considered in the preparation of the Draft EIR.

On February 27, 2015 the County published a Revised Notice of Preparation of an EIR, because of revisions to MVWPSP by the applicant. The revisions included removal of the portion of the West Parcel that is in the Tahoe Basin (and within the jurisdiction of TRPA), including the 112.8-acre area that was subject to the Area Plan. As a result, the Area Plan is not part of the MVWPSP. The Revised NOP was distributed for a 30-day comment period concluding on March 30, 2015. The Revised NOP was distributed to public agencies and interested individuals of the community, including residents within 1,000 feet of the Project area. Comments received on the Revised NOP are contained in Appendix C to the EIR.

The EIR includes an analysis of the following issue areas:

- Land Use and Forest Resources;
- Population, Employment, and Housing;
- Biological Resources;
- Cultural Resources;
- Visual Resources;
- Transportation and Circulation;
- Air Quality;
- Greenhouse Gas Emissions and Climate Change;
- Noise;
- Geology and Soils;
- Hydrology and Water Quality;
- Utilities;
- Public Services and Recreation;
- Hazards and Hazardous Material.

(See Draft EIR, pp. 1-3.)

The County distributed the Draft EIR to various public agencies, citizen groups, and interested individuals for an initial 45-day public review period, from October 22 through December 07, 2015. The comment period was subsequently extended to December 22, 2015, based on requests from the reviewing public. Comments were solicited during the public comment time frame and were incorporated into the final EIR. This period satisfied the requirement for a 45-day public review period as set forth in Section 15105 of the CEQA Guidelines. The Draft EIR was circulated to state agencies for review through the State Clearinghouse of the Governor's Office of Planning and Research. Copies of the Draft EIR were available for public review during normal business hours at the County. Copies of the Draft EIR were also available for review on the County's website.

During the review period, consistent with Section 15202 of the CEQA Guidelines, the public was invited to a public comment hearing held by the County. A public meeting was held to solicit comments on the Draft EIR on November 19, 2015, at the North Tahoe Conference Center. Oral and written comments were received from members of the public, organizations and several agencies. (See Final EIR, Chapter 23.)

On May 3, 2016, the County released the Final EIR for the Project. The Final EIR includes comments on the Draft EIR, responses to those comments, revisions to the text of the Draft EIR, and other information required by CEQA and the Errata to the Final EIR. The County distributed copies of the Final EIR to public agencies submitting comments on the Draft EIR, as required by Public Resources Code section 21092.5.

On June 9, 2016 and July 7, 2016, the Placer County Planning Commission held duly noticed public hearings to consider the Final EIR and the Project. After receiving and considering public comment, the Planning Commission recommended the Board of Supervisors deny the MVWPSP and deny certification of the Final EIR. On September 13, 2016, the Board of Supervisors held a duly noticed public hearing to consider the Final EIR and the Project. The Board received public comment, and closed the public hearing to further public testimony. The Board of Supervisors rejected the Planning Commission recommendation and on September 13, 2016, took tentative action to certify the Final EIR and Errata and directed staff to bring forward a final resolution for the Board's consideration. On October 11, 2016, the Board took final action to certify the Final EIR and Errata.

The Board of Supervisors has reviewed and considered, as a whole, the evidence and analysis presented in the Draft EIR, the evidence and analysis presented in the comments on the Draft EIR, the evidence and analysis presented in the Final EIR, the information submitted on the Final EIR, the Errata to the EIR, and the reports prepared by the experts who prepared the EIR, the County's planning consultants, and by staff, and after receiving and considering public comment, makes the findings set forth herein.

IV. RECORD OF PROCEEDINGS

In accordance with Public Resources Code section 21167.6, subdivision (e), the record of proceedings for the County's decision on the Project includes the following documents:

- The NOP and all other public notices issued by the County in conjunction with the Project;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- The Draft EIR for the Project (October 2015) and all appendices;
- All comments submitted by agencies or members of the public during the comment period on the Draft EIR;
- The Final EIR for the Project, including comments received on the Draft EIR, and responses to those comments and appendices (April 2016);
- The errata to the EIR (June 2016);
- Documents cited or referenced in the Draft EIR and Final EIR;
- The mitigation monitoring and reporting program for the Project;

- All findings and resolutions adopted by the Planning Commission or the Board of Supervisors in connection with the Project and all documents cited or referred to therein;

- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the County, consultants to the County, as well as responsible or trustee agencies with respect to the County's compliance with the requirements of CEQA and with respect to the County's action on the Project;

- All documents submitted to the County by other public agencies or members of the public in connection with the Project, up through the close of the Board's public hearing on October 11, 2016;

- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the County in connection with the Project;

- Any documentary or other evidence submitted to the County at such information sessions, public meetings, and public hearings;

- The Placer County General Plan and all environmental documents prepared in connection with the adoption of the General Plan;

- The Martis Valley Community Plan and all environmental documents prepared in connection with the adoption of the Community Plan;

- The Placer County Zoning Ordinance (Chapter 17 of the County Code) and all other applicable County Code provisions cited in materials prepared by or submitted to the County;

- Any and all resolutions adopted by the County regarding the Project, and all staff reports, analyses, and summaries related to the adoption of those resolutions;

- Matters of common knowledge to the County, including, but not limited to federal, state, and local laws and regulations;

- Any documents expressly cited in these findings, in addition to those cited above; and

- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

The County has relied on all of the documents listed above in reaching its decision on the Project, even if not every document was formally presented to the County. Without exception, any documents set forth above not so presented fall into one of two categories. Many of them reflect prior planning or legislative decisions with which the County was aware in approving the Project. Other documents influenced the expert advice provided to Planning Department staff or consultants, who then provided advice to the Board of Supervisors. For that reason, such documents form part of the underlying factual basis for the County's decisions relating to the adoption of the Project.

The record of proceedings does not include documents or other materials subject to the attorney/client privilege, the common-interest doctrine, the deliberative process privilege, or other privileges recognized by statute or common law. Administrative draft documents that were prepared at the County's direction, but were not provided to the public or other agencies, and intra-County communications with respect to such administrative draft documents, are not part of the record of proceedings; rather, such documents reflect the County's deliberative process, and reflect initial drafts of documents that later appeared in final form in the record of proceedings. Because these initial working drafts do not reflect the final evidence

and analysis relied upon by the County, they are not part of the record of proceedings. In adopting these findings, the County does not waive its right to assert applicable privileges.

The public hearing transcript, a copy of all letters regarding the Draft EIR received during the public review period, the administrative record, and background documentation for the Final EIR, as well as additional materials concerning approval of the Project and adoption of these findings are contained in County files, and are available for review by responsible agencies and interested members of the public during normal business hours at Placer County. The custodian of these documents is the Placer County Planning Director. The documents are located at the Placer County Community Development Resource Center, 3091 County Center Drive, Auburn, CA 95603 and/or Placer County Tahoe Planning Office, 565 West Lake Blvd, Tahoe City, CA. All files have been available to the County and the public for review in considering these findings and whether to approve the Project.

V. FINDINGS REQUIRED UNDER CEQA

The California Environmental Quality Act, Public Resources Code §§ 21000 et seq. and the regulations implementing that statute, Cal. Code Regs. tit. 14, §§ 15000 et seq. (the "CEQA Guidelines") (collectively, the act and the CEQA Guidelines are referred to as "CEQA") require public agencies to consider the potential effects of their discretionary activities on the environment and, when feasible, to adopt and implement mitigation measures that avoid or substantially lessen the effects of those activities on the environment. Specifically, Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same statute states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in Public Resources Code Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091, subd. (a).) For each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The three possible findings are:

> (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
>
> (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
>
> (3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(Pub. Resources Code, § 21081, subd (a); see also CEQA Guidelines, § 15091, subd. (a).)

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental,

social and technological factors." CEQA Guidelines section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors* (*Goleta II*) (1990) 52 Cal.3d 553, 565.)

The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417 (*City of Del Mar*).) "[F]easibility" under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (Ibid.; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 (*Sequoyah Hills*); see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 [after weighing "'economic, environmental, social, and technological factors' … 'an agency may conclude that a mitigation measure or alternative is impracticable or undesirable from a policy standpoint and reject it as infeasible on that ground'"].)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).) The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Goleta II*, *supra*, 52 Cal.3d at p. 576.)

In making these Findings and the determination regarding the Project Approvals, the Board of Supervisors recognizes that the Project implicates a number of controversial environmental issues and that a range of technical and scientific opinion exists with respect to those issues. The Board of Supervisors has acquired an understanding of the range of this technical and scientific opinion by its review of the EIR, the comments received on the Draft EIR and the responses to those comments in the Final EIR, as well as testimony, letters and reports regarding the Final EIR and the merits of the Project. The Board of Supervisors has reviewed and considered, as a whole, the evidence and analysis presented in the Draft EIR, the evidence and analysis presented in the comments on the Draft EIR, the evidence and analysis presented in the Final EIR, the information submitted on the Final EIR, and the reports prepared by the experts who prepared the EIR, the County's planning consultants, and by staff, addressing these comments. In particular, the Board of Supervisors has considered the Alternatives presented in the EIR, as well as the proposed comments submitted by various commenters and the responses of the EIR preparers and staff to those comments. The Board of Supervisors has gained a comprehensive and well-rounded understanding of the environmental issues presented by the Project. In turn, that understanding has enabled the Board of Supervisors to make its decisions after weighing and considering the various viewpoints on these important issues. Accordingly, the Board of Supervisors certifies that its findings are based on a full appraisal of all of the evidence contained in the Final EIR, as well as the evidence and other information in the record addressing the Final EIR.

These findings constitute the Board of Supervisors' best efforts to set forth the evidentiary and policy bases for its decision to approve the Project in a manner consistent with the requirements of CEQA. These findings are not merely informational, but rather constitute a binding set of obligations that come into effect with the County's approval of the Project. In particular, in adopting these findings, the County commits itself to ensure the implementation of the mitigation measures approved in these findings.

The Board of Supervisors is adopting these findings for the entirety of the actions described in these findings and in the Final EIR. Although the findings below identify specific pages within the Draft and

Final EIR in support of various conclusions reached below, the Board of Supervisors incorporates by reference and adopts as its own, the reasoning set forth in both environmental documents, and thus relies on that reasoning, even where not specifically mentioned or cited below, in reaching the conclusions set forth below, except where additional evidence is specifically mentioned. This is especially true with respect to the Board of Supervisors' approval of all mitigation measures, policies and implementation programs recommended in the Final EIR, and the reasoning set forth in responses to comments in the Final EIR.

As noted, the Final EIR is incorporated into these Findings in its entirety. Without limitation, this incorporation is intended to elaborate on the scope and nature of Mitigation Measures, the basis for determining the significance of impacts, the comparative analysis of alternatives, and the reasons for approving the Project in spite of the potential for associated significant and unavoidable adverse impacts. In the event a mitigation measure recommended in the Final EIR has inadvertently been omitted below, such a mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in Section VI does not accurately reflect the mitigation measures in the Final EIR due to a clerical error, the language of the policies and implementation measures as set forth in the Final EIR shall control, unless the language of the policies and implementation measures has been specifically and expressly modified by these findings. Where the language of such measures differs between the Final EIR and these findings, the more stringent language shall control. The Board of Supervisors provides this direction in order to ensure that any such discrepancy shall be regarded as inadvertent, and shall not be regarded as an effort by the Board of Supervisors to undermine its commitment to adopt mitigation measures as necessary to avoid or substantially lessen significant environmental effects of the Project.

More generally, to the extent there are any inconsistencies in the mitigation measures identified in these findings, in Attachment A, or in the MMRP, any such inconsistencies are inadvertent and unintentional. The County intends that, in the event of such inconsistencies, such inconsistency shall be reconciled in the manner that affords the greatest possible protection to the environment, in a manner consistent with the specific terms of the mitigation measures as adopted. In the event there are any future uncertainties or disputes regarding the nature, scope or feasibility of the adopted mitigation measures, the Board of Supervisors directs staff to return to the Board of Supervisors, at a properly noticed public hearing, to consider any such uncertainties or disputes. The Board of Supervisors intends that, in the event such a hearing is necessary, the public and other agencies will have an opportunity to review and comment on the manner in which such measures are implemented, and the Board of Supervisor's resolution of such issues occurs in a manner that allows the public to understand the basis for the Board of Supervisor's decision.

These findings provide the written analysis and conclusions of the Board of Supervisors regarding the environmental impacts of the Project and the mitigation measures included as part of the Final EIR and adopted by the Board of Supervisors as part of the Project. To avoid duplication and redundancy, and because the Board of Supervisors agrees with, and hereby adopts, the conclusions in the Final EIR, these findings will not always repeat the analysis and conclusions in the Final EIR, but instead incorporates them by reference herein and relied upon them as substantial evidence supporting these findings.

In making these findings, the Board of Supervisors has considered the opinions of other agencies and members of the public. The Board of Supervisors finds that the determination of significance thresholds is a judgment decision within the discretion of the Board of Supervisors; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and County staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although, as a legal matter, the Board of Supervisors is not bound by the significance determinations in the EIR (see Pub. Resources Code, § 21082.2, subd. (e)), except as expressly set forth in these findings,

the Board of Supervisors finds these significance thresholds persuasive and hereby adopts them as its own.

Section VI of these findings summarizes the environmental determinations of the Final EIR and Project's potentially significant impacts before and after mitigation. Section VI does not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Instead, Section VI provides a summary description of each impact, sets forth the mitigation measures identified to reduce or avoid the impact, and states the Board of Supervisors' findings on the significance of each impact after imposition of the adopted MVWPSP Project's provisions and the recommended mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final EIR and these findings hereby incorporate by reference the discussion and analysis in the Final EIR supporting the Final EIR's determination regarding the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the Board of Supervisors ratifies, adopts and incorporates in these findings the determinations and conclusions of the Final EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

Because the EIR identified significant effects that may occur as a result of the project, and in accordance with the provisions of the Guidelines presented above, the County hereby adopts these findings as part of the approval of the MVWPSP Project. These findings constitute the County's best efforts to set forth the evidentiary and policy bases for its decision to approve the Project in a manner consistent with the requirements of CEQA. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that come into effect with the County's approval of the Project.

VI. POTENTIALLY SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The EIR identified a number of significant and potentially significant environmental effects (or impacts) that the Project will cause or contribute to. These significant effects can be avoided or substantially lessened through the adoption of feasible mitigation measures. The Board of Supervisors' findings with respect to the Project's significant effects and mitigation measures are set forth in the table appearing at Attachment A to these findings. The findings set forth in the table are adopted and incorporated by reference.

The table at Attachment A does not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Instead, the table provides a summary description of each impact, describes the applicable mitigation measures identified in the Draft EIR or Final EIR and adopted by the Board of Supervisors, and states the Board of Supervisors' findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found the Draft EIR and Final EIR, or elsewhere in the record of proceedings, and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the Final EIR's determinations regarding the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the Board of Supervisors ratifies, adopts, and incorporates into these findings the analysis and explanation in the Draft EIR, the Final EIR, or elsewhere in the record, and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Draft EIR and Final EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

The Board of Supervisors has adopted all of the mitigation measures identified in the table. Some of the measures identified in the table are also within the jurisdiction and control of other agencies. To the extent any of the mitigation measures are within the jurisdiction of other agencies, the Board of Supervisors finds those agencies can and should implement those measures within their jurisdiction and control.

Some of the comments on the Draft EIR suggested additional mitigation measures and/or modifications to the measures recommended in the Draft EIR. In considering specific recommendations from commenters, the County has been cognizant of its legal obligation under CEQA to substantially lessen or avoid significant environmental effects to the extent feasible. The County recognizes, moreover, that comments frequently offer thoughtful suggestions regarding how a commenter believes that a particular mitigation measure can be modified, or perhaps changed significantly, in order to more effectively, in the commenter's view, reduce the severity of environmental effects. The County is also cognizant, however, that the mitigation measures recommended in the Draft EIR represent the professional judgment and experience of the County's expert staff and environmental consultants. The County therefore believes that these recommendations should not be lightly altered. Thus, in considering commenters' suggested changes or additions to the mitigation measures as set forth in the Draft EIR, the County, in determining whether to accept such suggestions, either in whole or in part, has considered the following factors, among others: (i) whether the suggestion relates to a significant and unavoidable environmental effect of the Project, or instead relates to an effect that can already be mitigated to less than significant levels by proposed mitigation measures in the Draft EIR; (ii) whether the proposed language represents a clear improvement, from an environmental standpoint, over the draft language that a commenter seeks to replace; (iii) whether the proposed language is sufficiently clear as to be easily understood by those who will implement the mitigation as finally adopted; (iv) whether the language might be too inflexible to allow for pragmatic implementation; (v) whether the suggestions are feasible from an economic, technical, legal, or other standpoint; (vi) whether the proposed language is consistent with the project objectives; and (vii) whether the suggestions may result in other impacts that are more severe than the impacts that the suggestions are designed to address, such that on the whole the suggestions do not reflect an improvement over those measures identified in the EIR.

As is evident from the specific responses given to specific suggestions, County staff and consultants spent significant time carefully considering and weighing proposed mitigation language, and in many instances adopted much of what a commenter suggested. In some instances, the County developed alternative language addressing the same issue that was of concern to a commenter. In no instance, however, did the County fail to take seriously a suggestion made by a commenter or fail to appreciate the sincere effort that went into the formulation of suggestions.

Based on this review, as is evident from the Final EIR, the County modified several of the original proposed measures in response to such comments (see Final EIR, Chapter 2). The Board of Supervisors commends staff for its careful consideration of those comments, agrees with staff in those instances when staff did not accept proposed language, and hereby ratifies, adopts, and incorporates staff's reasoning on these issues.

For this project, the following impacts were identified as significant and unavoidable. That is, these impacts remain significant, despite the incorporation of all feasible mitigation measures to substantially lessen or avoid these impacts:

Visual Resources, Cumulative Impact 9-9: Cumulative effects on light and glare

The Project will result in new sources of light that may, on a cumulative basis, have a significant impact on the environment (Cumulative Impact 9-9). Specifically, the Project would result in new light sources that would be potentially visible from Martis Valley and would introduce new light sources in a portion of the view that is not already affected by light, which would contribute to the existing adverse effects on nighttime views. This impact is not significant on a project-specific level. This impact does, however, result in a cumulatively considerable contribution to this impact. Thus, the MVWPSP would result in a considerable contribution to a cumulatively significant impact on nighttime views. The project has made a variety of commitments to address these impacts. These commitments are binding elements of the Project that the applicant must implement. These commitments are described in Draft EIR section 9.4.5. Under

the Development Standards, the Project is required to implement measures to reduce light pollution, which would limit light sources to the minimum amount necessary to maintain nighttime safety, utility, security, and productivity. No additional mitigation has been proposed and/or found to be feasible. This impact is therefore considered significant an unavoidable.

Transportation and Circulation, Impacts 10-1 and 10-2: Impacts to intersection operations and roadway segments

The Project will result in substantial impact upon the existing transportation systems, including intersection operations (Impact 10-1) and roadway segments (Impact 10-2). Specifically, the project would worsen already unacceptable operations (i.e., already beyond the acceptable threshold) at the SR 267/I-80 WB Ramps, SR 267/Schaffer Mill Road/Truckee Airport Road and SR 267/Highlands View Road intersections during the winter peak hour (Impact 10-1). In addition, the Project would worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28, resulting in a segment either degrading from acceptable LOS D to unacceptable LOS E, or exacerbating conditions on a segment operating at an unacceptable LOS E by an increase in V/C ratio of 0.05 or more, for both the summer and winter peak hours (Impact 10-2). The project has made a variety of commitments to address these impacts. These commitments are binding elements of the Project that the applicant must implement. These commitments are described in Draft EIR section 10.3.4. In addition, the Project applicant is required to implement the following mitigation measures: 10-1a, and 10-1b (coordinate with Caltrans to optimize signal timing at the intersections of SR 267 at I-80 WB and SR 267 at Schaffer Mill Road/Truckee Airport Road), 10-1c (provide signage on Highlands View Road, directing motorists to access SR 267 via Ridgeline Drive and Northstar Drive), and 10-2 (pay traffic impact fees to Placer County for future roadway improvements to SR 267). No additional feasible mitigation measures have been identified to address these impacts. These impacts are therefore considered significant and unavoidable.

Transportation and Circulation, Cumulative Impacts 10-8 and 10-9: Cumulative Impacts to intersection operations and roadway segments

On a cumulative basis, the Project would worsen traffic congestion at six of the SR 267 intersections between the Town of Truckee/Placer County Line and SR 28, resulting in an intersection either degrading from acceptable LOS D to unacceptable LOS F, or exacerbating conditions on a segment operating at an unacceptable LOS F by an increase in delay at the effected intersections, for both the summer and winter peak hours (Cumulative Impact 10-8). In addition, the Project would worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28, resulting in a segment either degrading from acceptable LOS D to unacceptable LOS E, or exacerbating conditions on a segment operating at an unacceptable LOS E by an increase in V/C ratio of 0.05 or more, for both the summer and winter peak hours (Cumulative Impact 10-9). The project has made a variety of commitments to address these impacts. These commitments are binding elements of the Project that the applicant must implement. These commitments are described in Draft EIR section 10.3.5. In addition, the Project applicant is required to implement the following mitigation measures: 10-8a through 10-8d, and 10-8f (pay traffic impact fees to Placer County for future roadway improvements to SR 267, including those affected intersections), 10-8e (provide signage on Highlands View Road and pay traffic impact fee), and 10-9 (pay traffic impact fees to Placer County for future roadway improvements to SR 267, including those effected segments). No additional feasible mitigation measures have been identified to address these impacts. In particular, in paying the County's adopted Traffic Impact Fee, the Project applicant is paying its "fair share" pursuant to an adopted fee program for the construction of the improvements listed in the County's Capital Improvement Program. These improvements include substantial improvements to SR267. (CEQA Guidelines, §§ 15126.4, 15130.) Requiring additional payments for these improvements would be in excess of the Project applicant's "fair share." These impacts are therefore considered significant and unavoidable.

Greenhouse Gas Emissions and Climate Change, Impact 12-2: Operational Greenhouse Gas Emissions

The Project will generate GHG emissions which would exceed the Tier I mass-emission threshold. GHG emissions would be substantial when the MVWPSP is built out. Therefore, operation of the project has the potential to result in a substantial contribution to GHG emissions. The Project has made a variety of commitments to address these impacts. These commitments are binding elements of the Project that the applicant must implement. These commitments are described in Final EIR section 2.2.9. The Project is required to implement the following mitigation measures: 12-2 (when submitting subdivision maps, the applicant shall insure that operation of the project would be consistent with the GHG targets adopted by the state or implement additional feasible mitigation measures). No additional feasible mitigation measures have been identified to address these impacts. These impacts are therefore considered potentially significant and unavoidable.

Greenhouse Gas Emissions and Climate Change, Cumulative Impact 12-4: Cumulative Greenhouse Gas Emissions

Project phasing is expected to take 20 years and the GHG emissions reduction targets and implementing regulations are not currently known. The project will generate substantial GHG emissions and it would be speculative to determine that the Project GHG emissions would be sufficiently mitigated to meet the emissions reduction targets that may be in place. The Project has made a variety of commitments to address these impacts. These commitments are binding elements of the Project that the applicant must implement. These commitments are described in Draft EIR section 12.3.5. The Project is required to implement the following mitigation measure: 12-2 (when submitting subdivision maps, the applicant shall insure that operation of the project would be consistent with the GHG targets adopted by the state, or implement additional feasible mitigation measures). No additional feasible mitigation measures have been identified to address these impacts. These impacts are therefore considered potentially significant and unavoidable.

VII. MITIGATION MONITORING AND REPORTING PROGRAM

The County has prepared a Mitigation Monitoring and Reporting Program (MMRP) for the Project. A copy of the MMRP appears at Chapter 4 to the Final EIR. The County, in adopting these findings, also approves the MMRP. The County will use the MMRP to track compliance with Project mitigation measures. The MMRP will remain available for public review during the compliance period. The MMRP is attached to and incorporated into the Project and is approved in conjunction with certification of the EIR and adoption of these Findings of Fact. In the event of any conflict between these findings and the MMRP with respect to the requirements of an adopted mitigation measure, the more stringent measure shall control, and shall be incorporated automatically into both the findings and the MMRP.

VIII. RECIRCULATION OF DRAFT EIR

The Board of Supervisors adopts the following findings with respect to the need to recirculate the Draft EIR. Under section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

"Significant new information" requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(CEQA Guidelines, § 15088.5.)

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is "not intend[ed] to promote endless rounds of revision and recirculation of EIRs." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132.) "Recirculation was intended to be an exception, rather than the general rule." (*Ibid*.)

The Board of Supervisors recognizes that the Final EIR incorporates information obtained by the County since the Draft EIR was completed, and contains additions, clarifications, modifications, and other changes. As noted above, several comments on the Draft EIR either expressly or impliedly sought changes to proposed mitigation measures identified in the Draft EIR as well as additional mitigation measures. As explained in the Final EIR (Text Changes and Responses to Comments), some of the suggestions were found to be appropriate and feasible and were adopted in the Final EIR and included in the MMRP. As discussed in the previous section of these findings, where changes have been made to mitigation measures to respond to comments, these changes do not change the significance of any conclusions presented in the Draft EIR.

CEQA case law emphasizes that "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) "'CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.' [Citation.] In short, a project must be open for public discussion and subject to agency modification during the CEQA process." (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936.) Here, the changes made to mitigation measures are exactly the kind of project improvements that the case law recognizes as legitimate and proper.

The changes to the Project and mitigation measures are described in Final EIR chapters 2 and 4. The changes are designed to incorporate specific suggestions from commenters. These revisions do not require recirculation of the Draft EIR. (See Final EIR, chapters 2, 4; see also Master Response 1.) None of these changes involves "significant new information" triggering recirculation because the changes to the mitigation measures do not result in any new significant environmental effects, any substantial

increase in the severity of any previously identified significant effects, or otherwise trigger recirculation. Instead, the modifications were either environmentally benign or environmentally neutral, and thus represent the kinds of changes that commonly occur as the environmental review process works towards its conclusion. Under such circumstances, the County finds that recirculation of the EIR is not required.

Following the release of the Final EIR on May 3, 2016 through and including the Placer County Planning Commission hearing on June 9, 2016, the County received 53 additional comment letters, including materials submitted during the hearing. Between the June 9, 2016 and July 7, 2016 Planning Commission hearings, the County received another 43 comment letters, for a total of 96 comment letters. These comment letters were forwarded to the Board of Supervisors for its consideration during its hearing on September 13, 2016. These were also forwarded to the County's environmental consultant, Ascent Environmental, for review and analysis to determine whether or not any comments in these letters would result in a change of conclusions in either the FEIR or these findings. Attachment B provides responses to these post-Final EIR release comments for information purposes and for inclusion in the administrative record.

Based on the County's independent review of these comments and responses to comments, the County has determined that none of the conditions warranting recirculation of a Draft EIR, as specified in CEQA Guidelines Section 15088.5, has occurred. As a result of this conclusion and based on the Board's independent review and consideration of the responses to comments and all written and oral testimony presented to it during its September 13, 2016 public hearing, the Board concludes there is no evidence to require recirculation of the EIR and further concludes that the Draft EIR and Final EIR are adequate and complete for purposes of these findings and certification of the Final EIR.

IX. PROJECT ALTERNATIVES

A. <u>Findings Regarding Project Alternatives</u>

Public Resources Code section 21002 provides that "public agencies should not approve Projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such Projects[.]" The same statute states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

Where a lead agency has determined that, even after the adoption of all feasible mitigation measures, a Project as proposed will still cause one or more significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the Project as mitigated, must first determine whether, with respect to such impacts, there remain any Project alternatives that are both environmentally superior and feasible within the meaning of CEQA. Although an EIR must evaluate this range of potentially feasible alternatives, an alternative may ultimately be deemed by the lead agency to be "infeasible" if it fails to fully promote the lead agency's underlying goals and objectives with respect to the Project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Ibid*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) Thus, even if a Project alternative will avoid or substantially lessen any of the significant environmental effects of the Project, the decision-makers may reject the alternative if they determine that specific considerations make the alternative infeasible, or if the alternative does not meet the objectives for the Project.

All of the environmental impacts associated with the Project may be substantially lessened or avoided with the adoption of the mitigation measures set forth in these findings, with the exception of the

following impacts:

- Visual Resources, Cumulative Impact 9-9 (light sources visible from Martis Valley, including portions of the view not already affected by light)

- Transportation and Circulation, Impact 10-1 (worsen already unacceptable operations at three SR 267 intersections between the Town of Truckee/Placer County Line and SR 28)

- Transportation and Circulation, Impact 10-2 (worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28)

- Transportation and Circulation, Cumulative Impact 10-8 (worsen traffic congestion at six of the SR 267 intersections between the Town of Truckee/Placer County Line and SR 28)

- Transportation and Circulation, Cumulative Impact 10-9 (worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28)

- Greenhouse Gas Emissions and Climate Change, Impact 12-2 (operation of the Project has the potential to result in a substantial contribution to GHG emissions)

- Greenhouse Gas Emissions and Climate Change, Cumulative Impact 12-4 (cumulative Project GHG emissions may exceed GHG reduction targets)

The Board of Supervisors' goal in evaluating the Project alternatives was to select an alternative that feasibly attains the Project objectives, while further reducing the Project's significant and unavoidable impacts. (Draft EIR, p. 19-1.)

As set forth in the Final EIR, the purpose and objectives for the Project are as follows:

- Provide new residential development consistent with the vision, goals, and policies of the MVCP, particularly:
    - Conserve large, intact and interconnected areas of natural open space that contributes to the last remaining habitat linkages between the Sierra Nevada and Mount Rose Wilderness Area in the Carson Range (Policy 1.A.6).
    - Minimize habitat fragmentation by development and roads to protect open space from human encroachment (Policy 1.A.6).
    - Consider the regional implications of development in the Martis Valley on resources outside of the Valley (i.e., Truckee River, Lake Tahoe Basin, Carson Range, and Sierra Nevada) (Policy 1.A.7).
    - Ensure that long-term conservation of important resource lands is achieved through a combination of regulatory actions, acquisition of easements, and both public and private land acquisitions (Policy 1.A.8).
    - Encourage the concentration of multi-family housing in and near village centers and neighborhood commercial centers (Policy 1.B.1).
    - Encourage the planning and design of new residential subdivisions to emulate the best characteristics (e.g., form, scale, and general character) of existing, nearby neighborhoods (Policy 1.B.2).
    - Require residential land Project design to reflect and consider natural features, noise exposure of residents, visibility of structures, circulation, access, and the relationship of the Project to surrounding uses (Policy 1.B.4).

    - Require that significant natural, open space, and cultural resources be identified in advance of development and incorporated into site-specific development Project design (Policy 1.B.9).
    - Identify available opportunities and designate land for small commercial centers where some of the needs of local area residents can be met, eliminating the need for trips outside the area (Policy 1.C.3).
    - Encourage the sustained productive use of forestland as a means of providing open space, maintaining the quality of Martis Valley's scenic vistas and to conserve other natural resources (Policy 1.F.1).
    - Encourage the preservation of timber producing lands as regional open space, and protect these areas from urban encroachment (Policy 1.J.1).
- Implement a density transfer and retirement by permanently retiring 600 East Parcel residential units and transferring 760 residential units and 6.6 acres of commercial uses from the East Parcel to the West Parcel while preserving in perpetuity 6,376 acres in conservation lands.
- Contribute to a large, continuous expanse of open space east of SR 267 by ensuring the permanent preservation of the East Parcel.
- Minimize isolated development that leads to fragmentation of open space and natural resources by developing on lands in proximity to existing development.
- Minimize visual impacts of development by using the natural features and terrain of the Project site to screen buildings.
- Limit new infrastructure and disturbance by developing on lands in proximity to existing development.
- Enhance and maintain existing trail system and associated recreational uses, such as cross-country skiing, snowshoeing, hiking, and biking trails.
- Implement a land use plan that is responsive to community concerns, such as visual character, traffic management, parking availability, recreational facilities, environmental issues, and the desire for expanded community services and amenities.
- Reduce reliance on automobiles by providing onsite services and amenities, a transit stop, and extensive cross-country skiing, hiking, and biking trails.
- Develop a Project that is consistent with the planning guidelines and principles of adopted plans and policies, particularly the MVCP.
- Create a development that draws upon the historic Sierra and Tahoe regional architectural traditions.
- Develop a financially sustainable Project that does not require the diminishment of services to existing residents.
- Incorporate sustainable design concepts to ensure long-term preservation, the enhancement of resources, and the reduction of site impacts.
- Reinforce the North Lake Tahoe region, including the Martis Valley, as a four-season destination resort.

(Draft EIR, chapter 3.3.)

The Draft EIR discussed several alternatives to the Project in order to present a reasonable range of options. To meet CEQA requirements for the consideration of alternatives, this environmental document evaluates the potential impacts of the Project, and four alternatives (including a No Project – No Development Alternative). The Final EIR included a fifth alternative – the East Parcel, Reduced Density Alternative.

To be suitable for consideration in the EIR, alternatives must be "potentially" feasible and "attain most of the basic objectives of the Project." (CEQA Guidelines, § 15126.6, subd. (a).) The Alternatives, analyzed in detail in the EIR, are:

- Alternative 1 – No Project – No Development;
- Alternative 2 – No Project – Martis Valley Community Plan Alternative;
- Alternative 3 – Reduced Density Alternative;
- Alternative 4 – Reduced Footprint, Hotel Alternative; and
- Alternative 5 – East Parcel, Reduced Density Alternative.

The Board of Supervisors finds that that a good faith effort was made to evaluate all feasible alternatives in the EIR that are reasonable alternatives to the Project and could feasibly obtain the basic objectives of the Project, even when the alternatives might impede the attainment of the Project objectives and might be more costly. As a result, the scope of alternatives analyzed in the EIR is not unduly limited or narrow. The Board of Supervisors also finds that all reasonable alternatives were reviewed, analyzed and discussed in the review process of the EIR and the ultimate decision on the Project. (See Draft EIR, pp. 19-1 to 19-38; Final EIR, pp. 2-35 to 2-43; see also Master Response 10, Response to Comment A-1-3, IO18-74, IO31-45 and 46, IO41-81 to 83, IO51-9, 15 and 16.)

B. Alternatives Analyzed in the Draft EIR and Final EIR

The goal for developing a set of possible alternatives was to identify other means to attain the Project objectives while further reducing the less than significant environmental impacts caused by the Project. The EIR analyzed the Project, and Alternatives 1, 2, 3, 4, and 5. The EIR contains a detailed analysis of the impacts of each of these alternatives. The analysis appears throughout the Final EIR. The Board of Supervisors hereby incorporates by reference this analysis. Table 19-4 in the Draft EIR (as modified in the Final EIR, p. 2-43) summarizes the EIR' conclusions concerning the impacts of, and mitigation measures applicable to, each alternative. This table includes the Project now proposed by the applicant.

Based on this analysis, the Board of Supervisors adopts the following findings with respect to each alternative.

These findings focus on whether the alternatives are, in fact, feasible, and attain the Project objectives. These findings are therefore distinct from the information in the Draft EIR, in which alternatives are considered if they are merely "potentially feasible," and attain "most" of the Project objectives. Under CEQA, these two inquiries are related, but distinct. In adopting these findings, the Board has considered the information in the EIR, as wells as other information in the record, to determine whether each alternative is feasible, and/or meets the Project objectives.

Alternative 1 – No Project, No Development

Under the No Project, No Development Alternative, no actions would be taken and both the East Parcel and West Parcel would remain unchanged from current conditions, undeveloped forested land. This alternative assumes that no development would occur on either the East or the West Parcels to allow for analysis/comparison of development alternatives to the undeveloped site conditions. It is assumed that lands zoned Forest and under Timberland Production Zone (TPZ) would remain unharvested.

The No Project, No Development Alternative would avoid all of the Project's significant and unavoidable impacts, and overall the impacts would be less than those that would occur with the Project. In fact, all of the significant impacts would be avoided. Accordingly, Alternative 1 is the environmentally superior alternative. (CEQA Guidelines, § 15126.6; see Draft EIR, p. 19-36.)

Feasibility/Ability to Meet Project Objectives

Under Alternative 1, the No Project – No Development alternative, the MVWPSP would not be approved, and no development would occur on either parcel. This would avoid the Project's significant and

unavoidable impacts, and lessen the impacts overall. However, with the exception of those goals pertaining to conservation of large, intact, and interconnected areas of natural open space and prevent fragmentation of habitat, the No Project, No Development Alternative would not meet any of the Project objectives and would not be consistent with the goals and objectives of the MVCP or the Placer County General Plan. This alternative would not enhance or maintain the existing trail system and associated recreational uses. Nor would this alternative achieve any of the economic benefits of the Project. Nor would this alternative contribute to regional transit needs.

Most important, this alternative would not result in the permanent preservation of the East Parcel as open space. As noted above, the following objectives are central to the Project:

- Conserve large, intact and interconnected areas of natural open space that contributes to the last remaining habitat linkages between the Sierra Nevada and Mount Rose Wilderness Area in the Carson Range (Policy 1.A.6).
- Minimize habitat fragmentation by development and roads to protect open space from human encroachment (Policy 1.A.6).
- Consider the regional implications of development in the Martis Valley on resources outside of the Valley (i.e., Truckee River, Lake Tahoe Basin, Carson Range, and Sierra Nevada) (Policy 1.A.7).

Under this alternative, the East Parcel would not be developed, but would retain its existing land-use designations and zoning, which authorize up to 1,360 residential units as well as up to 6.6 acres of commercial development. As the above objectives make clear, one of the central objectives of the Project is to preserve the East Parcel as a key component of a large system of open space east of SR 267. (See Conservation Biology Institute, Landscape-scale Conservation in Martis Valley, California – A Paradigm for Collaborative Partnerships (November 2015), which explains the extent to which the Project would complement efforts to permanently protect a large swath of contiguous public and private open space stretching from Lake Tahoe to the South, west to SR 267, and north into and across the eastern half of Martis Valley.) The Board finds this Project objective compelling. Because Alternative 1 would not meet this objective, or any other Project objective, the Board rejects Alternative 1.

Alternative 2 – No Project – Martis Valley Community Plan Alternative

Under Alternative 2, the No Project – MVCP Alternative, the existing Placer County MVCP land use plan and zoning would remain in place. The majority of the 6,376-acre East Parcel and all of the West Parcel are designated Forest and zoned TPZ. However, the MVCP designates approximately 670 acres of the East Parcel as Low Density Residential and General Commercial; this area is zoned Single-Family Residential and Neighborhood Commercial. Under this alternative, development would occur pursuant to the MVCP land use designations, which would include up to 1,360 dwelling units on 670 acres of the East Parcel, up to 6.6 acres of commercial land uses throughout the 670 East Parcel development area, and 5,706 acres of the East Parcel and all of the West Parcel would remain designated as Forest and zoned TPZ and would remain undeveloped forest, managed as allowed by the TPZ.

The No Project – MVCP Alternative would have similar impacts to the Project in the areas of Population, Employment, and Housing, Cultural Resources, Visual Resources (including the same significant and unavoidable impact), Geology and Soils, and Hazards and Hazardous Materials. This alternative would have similar/greater impacts compared to the Project in the areas of Land Use and Forest Resources, Air Quality, Greenhouse Gas Emissions and Climate Change, (including the same potentially significant and unavoidable impact), Noise, Hydrology and Water Quality, Utilities, and Public Services and Recreation. The No Project, MVCP Alternative would have greater impacts in the areas of Biological Resources (including a potential for a new significant and unavoidable impact) and Transportation and Circulation (including similar significant and unavoidable impacts). These greater impacts would occur because (1)

development of the East Parcel would bisect an intact swath of forest, and could have a greater impact on wildlife movement than the Project, and (2) because Alternative 2 would involve development of 1,360 residential units, there would be an increase of about 80% in the number of residential units, and a corresponding increase in trip generation, which would result in somewhat greater traffic impacts than the Project. (Draft EIR, section 19.5.)

The Board finds that the No Project – Martis Valley Community Plan alternative is not environmentally superior to the Project, and rejects this alternative on that basis.

Feasibility/Ability to Meet Project Objectives

The No Project, MVCP Alternative would further some of the Project objectives to a degree, and be consistent with the MVCP and the Placer County General Plan. In other respects, however, this alternative would not meet the County's objectives for the Project. Most importantly, this alternative would not meet the conservation objectives of the Project, and would hinder efforts to establish a large, continuous expanse of open space east of SR 267. (See Conservation Biology Institute, Landscape-scale Conservation in Martis Valley, California – A Paradigm for Collaborative Partnerships (November 2015), which explains the extent to which the Project would complement efforts to permanently protect a large swath of contiguous public and private open space stretching from Lake Tahoe to the South, west to SR 267, and north into and across the eastern half of Martis Valley.)

The Board finds that the objectives aimed at permanent protection of this area are central to the Project. The Board rejects this alternative because it is inconstant with those objectives.

The Board rejects this alternative both because it is not environmentally superior to the Project, and because this alternative fails to meet objectives for the Project. The Board rejects this alternative for both of these reasons, and for each of them. Thus, even if the record supported only one of these reasons, the Board would nevertheless reject this alternative.

Alternative 3 – Reduced Density Alternative

Under the Reduced Density Alternative, the majority of the same features of the MVWPSP would remain in place, but with a reduction in the number of dwelling units in the West Parcel by approximately 45 percent (a reduction of 342 units). In all other respects the alternative would be the same as the proposed MVWPSP as described above. Based on the potential intersection and roadway impacts, this alternative was formulated to reduce the magnitude of the significant and unavoidable impacts identified for the Project.

The Reduced Density Alternative would have similar/less impacts compared to the Project in all areas studied. This alternative would result in the same significant and unavoidable impacts in the areas of Visual Resources, Transportation and Circulation, and Greenhouse Gas Emissions and Climate Change. Thus, this alternative would not avoid any of the significant and unavoidable impacts of the Project, although the extent to which this alternative contributes to these impacts would be incrementally less than for the Project. (Draft EIR, section 19.6.)

Feasibility/Ability to Meet Project Objectives

The Reduced Density Alternative would further many of the Project objectives and be consistent with the MVCP and Placer County General Plan. In particular, this alternative would result in eliminating residential and commercial land-use designations and zoning on the east side of SR 267, and thus contribute to regional efforts to provide permanent protection to a large swath of open space in this area.

Mountainside Partners LLC has provided information regarding the economic feasibility of the Project compared to Alternative 3, the Reduced Density Alternative and Alternative 5, the East Parcel, Reduced Density Alternative. The results of this study are located in the report titled *Martis Valley West Parcel Specific Plan Economic Viability Analysis, Alternative 3 and Alternative 5* (May 2016). This study is presented as evidence that Alternative 3 is economically infeasible.

The study finds that most fixed, common costs (construction of roadways, water & sewer systems, utilities, and homeowner amenities) for buildout of the Project would be approximately $65 million. Although the Project would be built out over 16-20 years, most of the common costs would be incurred early in the Project life cycle. The requirement for significant up-front capital investment entails considerable risk, in that the return on that up-front investment may take years, and may straddle multiple real estate cycles. Such an investment also entails risk due to the lengthy period during which the invested, up-front capital provides returns. According to the study, the high initial cost associated with the Project, combined with the 16-20 year build out (and the likely significant wait for full return on investment) places the Project in a category of high risk. The amount of risk associated with the Project necessitates an Internal Rate of Return (IRR) range of 10% to 15% to attract investors. Absent such an IRR, investment capital will instead be directed to other investments that entail less risk. The life-of-Project financial model calculated an IRR of 11% for the Project, which falls within the acceptable range of 10% to 15%.

The study determines that the common costs for Alternative 3 would be the same as the Project ($65 million). That is because the basic infrastructure for Alternative 3 would be comparable to that required for the Project (for example, the access intersection improvements, primary access and emergency access and backbone utility lines); there is no basic infrastructure that could be down-sized or eliminated as a result of reducing the number of units to be built. Alternative 3 would build out over 11 years, rather than over 16 years under the Project (again, due to the reduced unit count). Taking these factors into account, the study concludes that Alternative 3 would still be categorized as high risk, because it would face many of the same risks to capital as the Project. Investors would still require an IRR of 10% to 15% in order to make the investment attractive, as compared to other, lower risk alternatives. The Life-of-Project financial model determined that Alternative 3 would have an IRR of 5%. This IRR is insufficient to attract investment capital. For this reason, Alternative 3 would not be financially feasible.

For the reasons set forth herein the Board rejects Alternative 3 as infeasible.

<u>Alternative 4 – Reduced Footprint, Hotel Alternative</u>

Under Alternative 4, the Reduced Footprint, Hotel Alternative, the development would be reduced to 500 residential units, 14,475 square feet of recreational homeowner amenities, a 100-unit resort hotel, a 150-space recreational parking lot, and 22,000 square feet of commercial development. This would reduce the total development area to 550 acres, and provide a focus on recreation, including hiking, cycling, and cross-country skiing. Conservation of the East Parcel would occur as described in the proposed MVWPSP.

The Reduced Footprint, Hotel Alternative would have similar/less impacts compared to the Project in the areas of Land Use and Forest Resources, Population, Employment, and Housing, Cultural Resources, Visual Resources (though with the same significant and unavoidable impact), Transportation and Circulation (including the same significant and unavoidable impact), Geology and Soils, Hydrology and Water Quality, Utilities, Public Service and Recreation, and Hazards and Hazardous Materials. This alternative would have similar impacts to the Project in the areas of Biological Resources, and Air Quality. The Reduced Footprint, Hotel Alternative would have similar/greater impacts compared to the Project in the areas of Noise, particularly traffic noise. However, the Draft EIR notes that attainment of the Placer County noise standard would be achieved through mitigation as necessary. (Draft EIR, section

19.7.9.)

The Draft EIR states that Alternative 4 would have similar impacts with respect to Greenhouse Gas Emissions and Climate Change (significant and unavoidable impact) as compared to the Project. Operational GHG emissions are generated from a variety of sources, among them vehicular exhaust from those traveling to and from the site. The driving habits of those traveling to a hotel differ from those traveling to a single-family residence or condominium. In particular, those driving to a hotel tend to have a higher turnover rate, and thus to make more trips to and from the site, than those traveling to a single-family residence or condominium, who tend to stay at the destination for longer periods of time. These facts are reflected in the estimated "vehicle miles traveled" ("VMT") that will result under this alternative, as compared to the Project. (See Draft EIR, Table 19-3, indicating higher daily trips under this alternative.) Transportation and Circulation impacts are slightly lower for this alternative because these impacts focus on "peak hour" trip generation, rather than on daily trip generation or VMT. The increase in VMT related Greenhouse Gas Emissions is magnified by the hotel (accounting for approximately 25% of the total vehicle trips under Alternative 4) which would generate more external trips than the Project. (Draft EIR, section 19.7.6.) This alternative thus represents a tradeoff. This alternative has a smaller "footprint," and lower peak-hour traffic. This alternative also would generate incrementally greater GHG emissions, however.

In light of these trade-offs, the Board finds that Alternative 4 is not environmentally superior to the Project. The Board rejects this alternative on that basis.

Feasibility/Ability to Meet Project Objectives

The Reduced Footprint, Hotel Alterative would further many of the Project objectives and be consistent with the MVCP and Placer County General Plan (as amended), though not to the extent the Project would be. The Reduced Footprint, Hotel Alternative fails to reduce the significant and unavoidable impacts of the MVWPSP to less than significant levels and would have potentially greater impacts in the area of Greenhouse Gas Emissions and Climate Change and the same significant and unavoidable impact.

The Board finds that Alternative 4 is not environmentally superior to the Project. The Board rejects this alternative both because it is not environmentally superior to the Project, and because this alternative may not be feasible in light of the recent history of hotel development in the region. The Board rejects this alternative for these reasons, and for each of them. Thus, even if the record supported only one of these reasons, the Board would nevertheless reject this alternative.

<u>Alternative 5 – East Parcel, Reduced Density Alternative</u>

The County received comments on the Draft EIR proposing consideration of an alternative that had not been analyzed in detail in the Draft EIR. (Comments IO31-45 and IO31-46.) The County incorporated an analysis of this alternative – "Alternative 5" – into the Final EIR in order to add further to the reasonable range of potentially feasible alternatives considered. Accordingly, the text of Chapter 2, Section 2.3, "Alternatives to the Proposed Project," on pages 2-6 and 2-7 of the Draft EIR is revised to include the East Parcel, Reduced Density Alternative (discussed in Final EIR, section 2.2.13).

Under Alternative 5, the residential development would remain on the East Parcel but would be reduced from 1,360 units to 418 units, and from 670 acres to 200 acres. The commercial development would be reduced to approximately 3.6 acres. In all other respects, this alternative would be the same as the No Project – MVCP Alternative. The entire West Parcel would remain designated Forest and zoned TPZ, and the remainder of the East Parcel, including 470 acres that had been designated Low Density Residential

and General Commercial, would be rezoned as TPZ and designated Forest as well. This alternative does not include a conservation easement or sale of lands to a conservancy or land trust.

Alternative 5 would have similar/less impacts compared to the Project in the areas of Land Use and Forest Resources, Population, Employment, and Housing, Cultural Resources, Air Quality, Noise, Geology and Soils, Hydrology and Water Quality, Utilities, Public Services and Recreation, and Hazards and Hazardous Materials. This alternative would have similar/less impacts compared to the Project, but still have the same significant and unavoidable impacts in the areas of Visual Resources, Transportation and Circulation, and Greenhouse Gas Emissions and Climate Change. The East Parcel, Reduced Density Alternative would have similar/less impacts compared to the MVWPSP, but have the potential for a new significant and unavoidable impact in Biological Resources (disruption to wildlife movement corridors). (Final EIR, section 2.2.13.)

As the Final EIR states: "As with the Project, the development would alter currently undeveloped forested land. Overall, impacts of this alternative would be similar in character but less in degree, as the footprint of development would be reduced. However, this alternative would have a greater chance to adversely impact wildlife movement corridors because the development would be more separated from existing development. The East Parcel development site could bisect an intact swath of forested habitat that connects large areas of undeveloped public lands to the north and south of Martis Valley." (Final EIR, p. 2-36.)

The County finds this discussion compelling, in that it gets at the heart of one of the trade-offs associated with the Project, as compared to alternatives that would authorize development on the east side of SR 267. A key benefit of the Project is to move potential development from the east to the west side of SR 267. At present, development along the SR 267 corridor focuses on Northstar Ski Resort, on the west side of SR 267. The area east of SR 267 is largely undeveloped, and disturbance is limited to timber operations, grazing, recreation, and other open space uses. Much of the area is intact.

The Project provides for permanent preservation of the entire 6,376-acre East Parcel, which will ensure that the landscape integrity and dynamic ecological processes of the Martis Valley, together with surrounding public lands (totaling almost 50,000 acres) and the natural resources they support, will be maintained in perpetuity. When the East Parcel is combined with the ~28,000 acres of Tahoe and Toiyabe national forest land on the valley floor, this conservation area links the Mt. Rose and Granite Chief wilderness areas. The Conservation Biological Institute studied Landscape-scale Conservation in the Martis Valley, and reported a biological benefit eight times greater than fragmented conservation efforts would produce. The concept of large landscape-scale open space and wilderness conservation in the Sierra Nevada is now promoted by the US Department of the Interior, US Forest Service, State of California Natural Community Conservation Planning (NCCP) program, Wilderness Act, Lincoln Institute of Land Policy, Placer Legacy Program, and the inter-state Tahoe Regional Planning Agency.

Development of the East Parcel will fragment this broad swath of undeveloped land. That is true under zoning set forth in the existing MVCP. That will remain true, albeit to a slightly lesser degree, under Alternative 5.

The County disagrees with those commenters who suggest that the East Parcel is less sensitive than the West Parcel. The East Parcel is like a puzzle piece in the middle of a broad expanse of open space. The West Parcel is not; instead, the West Parcel is in the vicinity of Northstar Ski Resort and other related development, and no important wildlife corridors traverse the site. The County therefore finds that there is a compelling public interest in moving zoning authorizing development from the east side of SR 267 to the west side of SR 267. The County respectfully disagrees with those commenters who expressed a preference for Alternative 5. For this reason, the County rejects Alternative 5 on the ground that it is not environmentally superior to the Project. The County would reject Alternative 5 on this ground even if the

alternative were found to be feasible.

Feasibility/Ability to Meet Project Objectives

The County rejects Alternative 5 for the further and distinct reason that this alternative is infeasible. The County would make this finding even if Alternative 5 were found to be environmentally superior to the Project.

The East Parcel, Reduced Density Alternative would further some of the Project objectives to a degree, and be consistent with the MVCP and the Placer County General Plan, but not to the extent that the Project would. Importantly, this alternative would not meet the conservation objectives of the Project, and would be inapposite to the objective to contribute to a large, continuous expanse of open space east of SR 267. Further, this alternative has the potential for greater impacts, including more significant and unavoidable impacts (Biological Resources), than the Project.

Mountainside Partners LLC has provided information regarding the economic feasibility of the Project compared to Alternative 3, the Reduced Density Alternative and Alternative 5, the East Parcel, Reduced Density Alternative. The results of this study are located in the report titled *Martis Valley West Parcel Specific Plan Economic Viability Analysis, Alternative 3 and Alternative 5* (May 2016). This study, as summarized below, is provided as evidence that Alternative 3 is economically infeasible.

The study finds that most fixed, common costs (construction of roadways, water & sewer systems, utilities, and homeowner amenities) for buildout of the Project would be approximately $65 million. Although the Project would be built out over 16-20 years, most of the common costs would be incurred early in the Project life cycle. The requirement for significant up-front capital investment entails considerable risk, in that the return on that up-front investment may take years, and may straddle multiple real estate cycles. Such an investment also entails risk due to the lengthy period during which the invested, up-front capital provides returns. The high initial cost associated with the Project, combined with the 16 year build out (and the likely significant wait for full return on investment) places the Project in a category of high risk. The amount of risk associated with the Project necessitates an Internal Rate of Return (IRR) range of 10% to 15% to attract investors. Absent such an IRR, investment capital will instead be directed to other investments that entail less risk. The life-of-Project financial model calculated an IRR of 11% for the Project, which falls within the acceptable range of 10% to 15%. Thus, the Project is economically feasible.

Although both Alternative 3 and Alternative 5 contemplate reduced development of 418 residential units and 3.6 acres of commercial, Alternative 5 would be developed on the East Parcel. The study in comparing the common costs required for infrastructure and amenities on the East Parcel (at 418 units, built over 11 years), to the common costs on the West Parcel, the engineer's estimate concludes that building on the East Parcel would be substantially more expensive than the $65 million required for the West Parcel. The risk associated with Alternative 5 would therefore be high and require an IRR range of 10% to 15% as well. Alternative 5 would have the same revenue as Alternative 3, but significantly higher costs, indicating an IRR of less than 5%. A Project with an IRR of less than 5% would be unable to attract capital and would therefore not be constructed. That is because the risk-adjusted rate of return must be significantly greater than the return available from other investments that pose far less risk. For these reasons, Alternative 5 is financially infeasible.

The County rejects Alternative 5 for the further and distinct reason that this alternative does not meet Project objectives. The County would make this finding even if Alternative 5 were found to be environmentally superior to the Project. The County would also make this finding even if Alternative 5 were determined to be feasible. In particular, this alternative would not result in the permanent preservation of the East Parcel as open space. As noted above, the following objectives are central to the

Project:

- Conserve large, intact and interconnected areas of natural open space that contributes to the last remaining habitat linkages between the Sierra Nevada and Mount Rose Wilderness Area in the Carson Range (Policy 1.A.6).
- Minimize habitat fragmentation by development and roads to protect open space from human encroachment (Policy 1.A.6).
- Consider the regional implications of development in the Martis Valley on resources outside of the Valley (i.e., Truckee River, Lake Tahoe Basin, Carson Range, and Sierra Nevada) (Policy 1.A.7).

Under this alternative, the East Parcel would be developed albeit at a lower number of units than allowed under existing land-use designations. As the above objectives make clear, one of the central objectives of the Project is to preserve the East Parcel as a key component of a large system of open space east of SR 267. (See Conservation Biology Institute, Landscape-scale Conservation in Martis Valley, California – A Paradigm for Collaborative Partnerships (November 2015), which explains the extent to which the Project would complement efforts to permanently protect a large swath of contiguous public and private open space stretching from Lake Tahoe to the South, west to SR 267, and north into and across the eastern half of Martis Valley.) The Board finds this Project objective compelling. Because Alternative 5 would not meet this objective, the Board rejects Alternative 5.

In sum, the Board finds that Alternative 5 (1) is not environmentally superior, (2) is not feasible, and (3) does not meet basic Project objectives. For all of these reasons, and each of them, the Board rejects Alternative 5.

C. <u>Other Alternatives</u>

CEQA Guidelines section 15126.6(c) provides the following guidance in selecting a range of reasonable alternatives for the Project. The range of potential alternatives for the Project shall include those that could feasibly accomplish most of the basic objectives of the Project, and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental Project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the Project, the Project's significant effects, and unique Project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a).

Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decisionmaking body. (See Pub. Resources Code, § 21081(a)(3).) At the time of action on the Project, the decisionmaking body may consider evidence beyond that found in the EIR in addressing such determinations. The decision-making body, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that ground provided that the decision-making body adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's

determination. The Board adopts the following findings with respect to these alternatives.

760-acre West Parcel Development Area. The 760-acre West Parcel Development Area alternative was considered by Placer County but is not evaluated further in the EIR. A more detailed description of the previous proposal can be found in section 19.2.1 of the Draft EIR.

This alternative was the original MVWPSP and Area Plan proposal as it was described in the March 2014 notice of preparation (NOP). This alternative would consist of a specific plan and TRPA Area Plan and various entitlements and approvals associated with approval of these plans. The 760-acre West Parcel Development Area alternative shared many of the same features as the current MVWPSP, including moving the development from the East Parcel to the West, and permanently preserving the East Parcel. The main difference is that a portion of the West Parcel, and 112 residential units of the proposed development would have been within the Tahoe Basin and, therefore, within the TRPA's jurisdiction.

Comments on the NOP from agencies, stakeholders, interested parties, and environmental groups primarily focused on concerns with the Area Plan, development of 112 units within the Tahoe Basin, and concerns regarding potential effects on TRPA environmental threshold carrying capacities. The MVWPSP proposal was subsequently revised to establish the MVWPSP boundary at the Tahoe Basin boundary, removing the West Parcel development area from the Tahoe Basin, and suspending the proposed TRPA Area Plan from consideration with the MVWPSP.

This alternative would result in slightly increased ground disturbance and tree removal, similar construction impacts, and similar operational impacts to the Project. Similar to the Project, visual simulations of this alternative indicate that, although development would occur within the Tahoe Basin, the visual impacts of this alternative would be the same, meaning that the Project would be barely visible or not visible from surrounding vantage points because of topography, screening from forest lands, and buffers established around the development area.

Direct Access via Highlands View Road. Another alternative that was considered but not evaluated further is an alternative that would provide direct access to the Project from Northstar via Highlands View Road. Access directly to and from Northstar and the West Parcel development area would not be feasible because the applicant does not control the property between Northstar and the West Parcel. In addition, the MVCP contemplates a connection on SR 267 for the East Parcel; the Project shifts this connection to the north to align with the West Parcel primary access. For purposes of evaluating an alternative that would reduce impacts, such an alternative was not considered because the physical impacts of such a connection would not reduce the magnitude of significant transportation impacts because it would only shift trips between the Project and Northstar off of SR 267 for a short distance. Project residents and guests would still need to use SR 267 to access Northstar Drive, or to travel to Truckee or Lake Tahoe. Thus, the traffic-related impacts of the Project (e.g., to road segments and intersections on SR 267) would still occur. Lastly, a connection to Highlands View Drive would need to cross undeveloped land, and therefore could result in impacts on wetland or other resources that the direct connection to SR 267 would avoid. Therefore, direct access to the West Parcel development area from Northstar via Highlands View Road was not evaluated further. (Final EIR, p. 2-5; Response to Comment IO31-45.)

D. Environmentally Superior Alternative

Guidelines section 15126.6 states that an EIR should identify the "environmentally superior" alternative. Section 19.8 of the Draft EIR provides a comparison of the environmental effects of the alternatives in relation to the proposed MVWPSP to assist in identifying the environmentally superior alternative.

As discussed above, Alternative 1, the No Project – No Development Alternative, is the environmentally superior alternative, as all of the significant impacts of the Project would be avoided. CEQA Guidelines

section 15126.6 suggests that, "[i]f the environmentally superior alternative is the 'no Project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

Alternative 2, the No Project – MVCP Alternative, would result in a larger footprint of development on the East Parcel, resulting in greater impacts to forest resources; biological resources; transportation (increased vehicle trips); air quality; GHG emissions; noise; utilities; and public service and recreation. This alternative could result in additional potentially significant impacts to biological resources resulting from the disruption of a potential wildlife movement corridor. Alternative 2 would result in similar impacts related to population, employment, and housing; cultural resources; visual resources; geology and soils; and hazards and hazardous materials. This alternative would not meet the Project objectives described in Section 19.1.1 of the Draft EIR. In particular, it would not meet the following Project objectives, which are intended to provide environmental benefits:

- conserve large, intact and interconnected areas of natural open space that contributes to the last remaining habitat linkages between the Sierra Nevada and Mount Rose Wilderness Area in the Carson Range;
- minimize habitat fragmentation by development and roads to protect open space from human encroachment;
- implement a density transfer and retirement by permanently retiring 600 East Parcel residential units and transferring 760 residential units and 6.6 acres of commercial uses from the East Parcel to the West Parcel while preserving in perpetuity 6,376 acres in conservation lands;
- minimize isolated development that leads to fragmentation of open space and natural resources by developing on lands in proximity to existing development; and
- limit new infrastructure and disturbance by developing on lands in proximity to existing development.

Alternative 3, the Reduced Density Alternative, would result in similar impacts to the MVWPSP, but the reduction in development footprint, units, and population would reduce the severity of the impacts for all resources affected by the Project. Nonetheless, Alternative 3 would not avoid the significant and unavoidable impacts of the proposed MVWPSP. This alternative would further many of the basic Project objectives described in Section 19.1.1 of the Draft EIR, though not to the extent the Project would.

Alternative 4, the Reduced Footprint, Hotel Alternative, would also reduce the footprint of development, the number of units, and the population, which would result in a smaller area of ground disturbance, removal of fewer trees, some reduction in peak hour vehicle trips, reduced potential for impacts to cultural resources. Therefore, Alternative 4 would reduce potential impacts related to forest resources; population, employment and housing; cultural resources; visual resources; geology and soils; hydrology and water quality; utilities; public services; and hazards and hazardous materials. However, this alternative would result in similar impacts to biological resources, air quality, transportation and circulation, and noise and it would not avoid any significant and unavoidable impacts. Further, this alternative would potentially result in greater impacts in the area of Greenhouse Gas Emissions and Climate Change, and have the same significant and unavoidable impacts. Alternative 4 would further many of the basic Project objectives, though not to the extent of the Project (Draft EIR Section 19.1.1).

Alternative 5, the East Parcel Reduced Density Alternative, would result in similar impacts to the MVWPSP, but the reduction in development footprint, units, and population would reduce the severity of the impacts for all resources affected by the Project. Nonetheless, a Reduced Density Alternative on the East Parcel would not avoid the significant and unavoidable impacts of the proposed MVWPSP. In addition, this alternative could result in an additional potentially significant impact to biological resources resulting from the disruption of a potential wildlife movement corridor. Furthermore, this alternative would not meet the Project objectives described in Section 19.1.1 of the Draft EIR. In particular, it would not meet the following Project objectives, which are intended to provide environmental benefits:

- conserve large, intact and interconnected areas of natural open space that contributes to the last remaining habitat linkages between the Sierra Nevada and Mount Rose Wilderness Area in the Carson Range;
- minimize habitat fragmentation by development and roads to protect open space from human encroachment;
- implement a density transfer and retirement by permanently retiring 600 East Parcel residential units and transferring 760 residential units and 6.6 acres of commercial uses from the East Parcel to the West Parcel while preserving in perpetuity 6,376 acres in conservation lands;
- minimize isolated development that leads to fragmentation of open space and natural resources by developing on lands in proximity to existing development; and
- limit new infrastructure and disturbance by developing on lands in proximity to existing development.

Of the development alternatives, Alternative 3, the Reduced Density Alternative, would be the environmentally superior alternative. This alternative would meet the Project objectives and would reduce the severity of impacts to forest resources; population, employment, and housing; biological resources; cultural resources; visual resources; transportation (reduced vehicle trips); air quality; GHG emissions; noise; geology and soils; hydrology and water quality; utilities; public services and recreation; and hazards and hazardous materials. Alternative 3 would not, however, avoid the significant and unavoidable impacts identified for the proposed MVWPSP. Nor would it meet all of the Project objectives to the degree that the Project would.

X. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to CEQA section 21081 and CEQA Guideline 15093, the Board of Supervisors hereby finds, after consideration of the Final EIR and the evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the Project as set forth below independently and collectively outweighs these significant and unavoidable impacts and is an overriding consideration warranting approval of the Project. Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if all but one of these reasons were unsupported by substantial evidence, the Board would nevertheless by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Record of Proceedings.

On the basis of the above findings and the substantial evidence in the whole record of this proceeding, the Board of Supervisors specially finds that there are significant benefits of the Project to support approval of the Project in spite of the unavoidable significant impacts, and therefore makes this Statement of Overriding Considerations.

Specifically, the Project will result in significant and unavoidable impacts to Visual Resources (Cumulative Impact 9-9: Cumulative effects on light and glare), Transportation and Circulation (Impact 10-1: Impacts to intersection operations, Impact 10-2: Impacts to roadway segments, Cumulative Impact 10-8: Cumulative impacts to intersection operations, and Cumulative Impact 10-9: Cumulative impacts to roadway segments), and Greenhouse Gas Emissions and Climate Change (Impact 12-2: Operational greenhouse gas emissions, and Cumulative Impact 12-4: Cumulative greenhouse gas emissions).

Although the Board of Supervisors finds that the Project will result in these significant and unavoidable impacts, the Board also finds that the Project benefits outweigh these impacts.

The Board of Supervisors finds that, as part of the process of obtaining Project approval, all significant

effects on the environment from implementation of the Project have been eliminated or substantially lessened where feasible. All mitigation measures proposed in the FEIR that are applicable to the Project are adopted as part of this approval action. Furthermore, the Board of Supervisors has determined that any remaining significant effects on the environment found to be unavoidable are acceptable due to the following specific overriding economic, technical, legal, social and other considerations. Any alternatives proposed by the public are rejected for the reasons set forth in the EIR and the reasons set forth herein.

The Project benefits include:

- The Project provides for permanent preservation of the entire 6,376-acre East Parcel, which will ensure that the landscape integrity and dynamic ecological processes of the Martis Valley, together with surrounding public lands (totaling almost 50,000 acres) and the natural resources they support, will be maintained in perpetuity and that the "effective conservation" at a landscape scale is greater than the sum of its parts. Moreover, when the East Parcel is combined with the ~28,000 acres of Tahoe and Toiyabe national forest land on the valley floor alone, this conservation area links the Mt. Rose and Granite Chief wilderness areas. The Conservation Biological Institute studied Landscape-scale Conservation in the Martis Valley, and reported a biological benefit eight times greater than fragmented conservation efforts would produce. (Conservation Biology Institute, Landscape-scale Conservation in Martis Valley, California – A Paradigm for Collaborative Partnerships (November 2015), which explains the extent to which the Project would complement efforts to permanently protect a large swath of contiguous public and private open space stretching from Lake Tahoe to the South, west to SR 267, and north into and across the eastern half of Martis Valley.) The Board finds that this objective is compelling, and is a key reason why the Board is willing to approve the project, despite its significant and unavoidable effects.

- The concept of large landscape-scale open space and wilderness conservation in the Sierra Nevada is now promoted by the US Department of the Interior, US Forest Service, State of California Natural Community Conservation Planning (NCCP) program, Wilderness Act, Lincoln Institute of Land Policy, Placer Legacy Program, and the inter-state Tahoe Regional Planning Agency. The Project is consistent with that vision.

- The Project will provide new residential development consistent with the vision, goals, and policies of the MVCP including conserving large, intact and interconnected areas of natural open space, and minimizing habitat fragmentation by permanently preserving the entire 6,376-acre East Parcel (discussed above), and designating approximately 390 acres of the West Parcel as Forest to remain undeveloped except for utility infrastructure. The Project will limit new infrastructure and disturbance by developing on lands in proximity to existing development without developing in the Tahoe Basin and permanently reducing the total number of allowable residential units from 1,360 to 760. The Project will emphasize an all-season pedestrian environment within the MVWPSP by creating an extensive, 14 mile network of trails and passive recreation facilities, including parks and picnic areas for residents and guests.

- The Project will encourage the concentration of multi-family housing in and near village centers and neighborhood commercial centers, and designate land for small commercial centers where some of the needs of local area residents can be met, reducing the need for trips outside the area. The MVWPSP will be designed to reflect and consider natural features, noise exposure of residents, visibility of structures, circulation, access, and the relationship of the Project to surrounding uses, and emulate the best characteristics (e.g., form, scale, and general character) of existing, nearby neighborhoods. The Project will minimize visual impacts of development by using the natural features and terrain of the Project site to screen buildings. In addition, the Project will encourage the sustained productive use of forestland as a means of providing open

space, maintaining the quality of Martis Valley's scenic vistas and conserve other natural resources. The Project will reduce the risk of wildfire in the area through improved access to water and defensible space.

- The MVWPSP will reduce reliance on automobiles by providing onsite services and amenities, a transit stop, and enhancing and maintaining existing trail system and associated recreational uses, such as cross-country skiing, snowshoeing, hiking, and biking trails. The Project will draw upon the historic Sierra and Tahoe regional architectural traditions, and reinforce the North Lake Tahoe region, including the Martis Valley, as a four-season destination resort. The Project is designed to provide a stable and significant source of tax revenue for the County, including sales tax, and property tax. Lastly, the Project will be financially sustainable, will not diminish services to existing residents, and create as many as 300 temporary construction jobs, as well as up to 122 full-time equivalent employees once the Project is built out.

- The MVWPSP will provide significant benefits to the County, as set forth in the development agreement, by (1) making a substantial contribution to the County's work-force housing program, as set forth in the proposed development agreement, (2) providing well over $5 million in park and recreation benefits, as set forth in the proposed development agreement, (3) participating in the County's program to provide financial support for regional transit, and thereby reducing reliance on the automobile, and (4) generating substantial revenue through the County's Public Facilities and Traffic Impact fees.

- The Project will pay the cost of providing public services that are needed to serve the new development and therefore will "pay its own way," and will not result in costs to the County's existing residents and businesses.

Having considered these benefits, the Board of Supervisors finds that the benefits of the Project outweigh the unavoidable adverse environmental effects, and that the adverse environmental effects are therefore acceptable. The Board of Supervisors further finds that each of the above considerations is sufficient to approve the Project. For each of the reasons stated above, and all of them, the Project should be implemented notwithstanding the significant unavoidable adverse impacts identified in the EIR.

ATTACHMENTS

A Table of impacts, mitigation measures
B. MVWPSP Post-Final EIR Comments and Responses

ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
afy	Acre-Feet per Year
ADWF	Average Dry Weather Flow
ARB	California Air Resources Board
ARMR	Archaeological Resources Management Reports
BLM	United States Bureau of Land Management
BMP	Best Management Practice
BOD	Biological Oxygen Demand
CAA	Federal Clean Air Act of 1970

CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CBD	Center for Biological Diversity
CC&Rs	Covenants, Conditions, and Restrictions
CDF	California Department of Forestry
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFD	Community Facilities District
CHRIS	California Historic Resource Information System
CIP	Capital Improvement Plan
CO	Carbon Monoxide
CO2	Carbon Dioxide
CRHR	California Register of Historic Resources
CSA	County Service Area
CWA	Clean Water Act of 1972
CWPPs	Community Wildfire Protection Plans
dB	Decibel
dBA	A-weighted decibel
dbh	Diameter at Breast Height
DRC	Development Review Committee
EB	Eastbound
EIR	Environmental Impact Report
ESD	Engineering and Surveying Department
EVA	Emergency Vehicle Access
FEMA	Federal Emergency Management Agency
FTE	Full Time Equivalent
GHG	Greenhouse Gases
GIS	Geographic Information System
Gpm	gallons per minute
GSFLOW	Integrated surface water/groundwater model
HOA	Homeowners Association
HVAC	Heating Ventilation and Air Conditioning
I-80	Interstate 80
IRR	Internal Rate of Return
LAFCO	Local Agency Formation Commission
Lahontan	Regional Water Quality Control Board-Lahontan Region
LDM	Land Development Manual
Ldn	Day-night Average Sound Level
Leq	Energy Equivalent Sound Level
LID	Low Impact Development
Lmax	Maximum Sound Level
LOP	Limited Operating Period
LOS	Level of Service
LTBMU	Lake Tahoe Basin Management Unit

LU	Land Use
mgd	Million Gallons per Day
mg/kg	Milligrams per Kilogram
mg/L	Milligrams per Liter
MVGB	Martis Valley Groundwater Basin
MLD	Most Likely Descendant
MMRP	Mitigation and Monitoring Program
MRF	Materials Recovery Facility
MS4	Municipal Separate Storm Sewer System Permit
MT CO2e	Metric Tons of Carbon Dioxide Equivalent
MVCP	Martis Valley Community Plan
MVWPSP	Martis Valley West Parcel Specific Plan
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NCSD	Northstar Community Services District
NFD	Northstar Fire Department
NO_X	Oxides of Nitrogen
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination Program
NRCS	Natural Resources Conservation Services
NRHP	National Register of Historic Places
NSAQMD	Northern Sierra Air Quality Management District
NTFPD	North Tahoe Fire Protection District
O3	Ozone
OPR	California Governor's Office of Planning and Research
OS	Open Space
PAS	Plan Area Statements
PCAPCD	Placer County Air Pollution Control District
PM	Particulate Matter
PM10	Particulate Matter Less than 10 Microns in Diameter
PM2.5	Particulate Matter Less than 2.5 Microns in Diameter
PPM	Parts per Million
PRC	Public Resource Code
Project	Martis Valley West Parcel Specific Plan
psi	Pounds per square inch
PWWF	Peak Wet Weather Flows
ROG	Reactive Organic Gas
RWQCB	Regional Water Quality Control Boards
SMARTS	Stormwater Multiple Application & Reports Tracking System
SO2	Sulfur Dioxide
SR 267	State Route 267
SRA	State Responsibility Area
SWRCB	California State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
SWQP	Storm Water Quality Plan
TACs	Toxic Air Contaminants
TART	Tahoe Area Regional Transit

TAU	Tourist Accommodation Unit
TIF	Traffic Impact Fee
TMDL	Total Maximum Daily Load
TNT/TMA	Truckee-North Tahoe Transportation Management Association
TPZ	Timberland Production Zone
TRI	T-TSA's sewer infrastructure
TROA	Truckee River Operating Agreement
TRPA	Tahoe Regional Planning Agency
TSD	Truckee Sanitation District
T-TSA	Tahoe-Truckee Sanitation Agency
UAIC	United Auburn Indian Community
USACE	United States Army Corps of Engineers
USFS	United States Forestry Service
USFWS	United States Fish and Wildlife Service
V/C	Vehicle Congestion
VMT	Vehicle Miles Traveled
WB	Westbound
WEAP	Worker Environmental Awareness Program
WMA	Wildlife Management Areas
WSA	Water Service Agreement
WWTP	Wastewater Treatment Plant
ZOB	Zone of Benefit

MARTIS VALLEY WEST PARCEL SPECIFIC PLAN PROJECT
PLACER COUNTY, CALIFORNIA
TABLE OF IMPACTS, MITIGATION MEASURES, AND CEQA FINDINGS

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
LAND USE			
Impact 5-1. Alteration of present or planned land uses (LS) The proposed MVWPSP would establish the planning framework for development of a portion of the West Parcel, and provide for preservation of the remainder of the West Parcel, and the entirety of the East Parcel. The project would result in the redesignation of 662 acres of the West Parcel from Forest to Residential, and establish a Specific Plan zoning district (SPL-MVWPSP) on that acreage for which the MVWPSP would serve as the policy document. The remaining 390 acres of the West Parcel would remain designated Forest and zoned TPZ. Development subsequent to the MVWPSP could convert up to 651.5 acres of the West Parcel from forested land to residential, commercial, and recreational development. The 670-acre East Parcel development area, which could otherwise accommodate up to 1,360 dwelling units, would be redesignated Forest and zoned TPZ. The 6,160 acres of the East Parcel in Placer County would be preserved as permanent open space by either sale to a land trust or similar organization or by recordation of a conservation easement restricting the use of the East Parcel. The 216-acre portion of the East Parcel in Nevada County would remain designated Forest 160 in the Nevada County General Plan. While the MVWPSP project includes the entire 6,376-acre East Parcel, the MVWPSP Land Use Plan does not include the 216 acres in Nevada County or the 130 acres in the Tahoe Basin. Policies in the Specific Plan call for the preservation of the entire East Parcel (in both Placer and Nevada Counties) as permanent open space. The proposed MVWPSP land use designations and zoning would be consistent with the intent of the MVCP and the Placer County General Plan. (Draft EIR, pp. 5-16 to 5-19; see also Response to Comment IO26-4, IO31-15.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
Impact 5-2. Compatibility with surrounding land uses (LS) Implementation of the proposed MVWPSP would result in the construction of residential uses, homeowner amenities, commercial uses, and utilities infrastructure in a forested area that has historically been used for timber harvest and recreation. The West Parcel development area is proposed approximately one mile east of the Northstar Resort, which contains similar residential uses and densities to those proposed in the MVWPSP. The MVWPSP would prevent conflicts with existing recreational uses in the surrounding area by siting development away from existing trails and using natural features to screen new buildings and noise. The remainder of the West Parcel would remain Forest, and the entire 6,376-acre East Parcel would remain or be redesignated Forest and be placed in conservation in perpetuity or sold to conservation groups, connecting approximately 50,000 acres of open space east of SR 267. (Draft EIR, pp. 5-19 to 5-21, see also Response to Comment IO31-16.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 5-3: Conflict with the Placer County General Plan, Martis Valley Community Plan, designations or zoning, or plan policies adopted for the purpose of avoiding or mitigating an environmental effect (LS) Adoption of the MVWPSP would be consistent with the overall land use and policy framework of the MVCP and Placer County General Plan. The MVWPSP objectives, policies, definition of allowable uses, Development Standards, and Design Guidelines would be consistent with the pertinent provisions of the MVCP and Placer County General Plan. (Draft EIR, pp. 5-21 to 5-23.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 5-4: Conflict with or cause rezoning of forest land or Timberland Production Zone or involve other changes in the existing environment which, because of their location or nature, could result in substantial conversion of forest land to a non-forest use (LS) The MVWPSP would result in the	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
redesignation/rezoning of 662 acres of the West Parcel from Forest/ Timberland Production Zone (TPZ) to Residential/SPL-MVWPSP. The project would also redesignate/rezone 670 acres of the East Parcel from Residential and Commercial to Forest/TPZ. These actions would result in a net increase of 8 acres of timberlands zoned TPZ. In addition, project-related tree removal would be subject to a Timber Harvest Plan approved by the Board of Forestry, which includes provisions for the protection of water quality and biological habitats. (Draft EIR, pp. 5-23 to 5-24; see also Response to Comment IO7-4, IO16-2, 7 and 8, IO31-37.)			
Impact 5-5: Convert substantial forest land or adversely affect timber resources (LS) The MVWPSP would change the allowable land use on 662 acres of the West Parcel from Forest to Residential. Within that area, approximately 651.5 acres of forest land (per the PRC Section 12220(g) definition) could be converted to non-forested, developed uses, effectively removing that forest land from potential timber harvest. In addition, the installation of utilities could result in the conversion of up to 11.6 acres of forested land. The types of habitat that would be converted are locally and regionally common and abundant. The project-related conversion would not substantially reduce the size, continuity, or integrity of any forest habitat type in the region. The MVWPSP proposes conservation of the 6,376-acre East Parcel, which includes 5,951.2 acres of forest lands, including approximately 659.9 acres of forest land currently zoned for development under the MVCP, and approximately 275.4 acres of sensitive late seral forest nesting/denning habitat. All Forest-designated lands under the MVWPSP would be zoned TPZ, resulting in an increase of 8 acres zoned TPZ. With implementation of approved THPs, timber harvesting would be allowed on these lands. (Draft EIR, pp. 5-24 to 5-28; see also Response to Comment A-1-5, IO16-2, 7 and 8, IO31-37, IO40-4.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 5-6: Cumulative alteration of present or planned land uses; cumulative conflict with relevant plans,	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
policies, designations, or zoning (LS) The projects listed in Draft EIR Chapter 4, Table 4-2 would alter land uses in the region. Cumulative projects consist of residential development, including single-family, multi-family, affordable housing, and tourist units; commercial development, including hotel, office, and services; recreation projects, including ski facilities, trails, and campgrounds; and other projects. Some would convert what is currently undeveloped land to developed uses, some would result in redevelopment in already urbanized areas. Transportation projects would be implemented on existing roadways to improve traffic flow, levels of service, and traffic safety. Collectively, the cumulative projects would cause a substantial alteration of land in the region, resulting in increased urban, suburban, and recreational development, and establishment of infrastructure and utilities to serve such development. Growth and development in the region is guided by the various land use and planning documents of Placer County, Town of Truckee, and TRPA. These documents serve as the blueprints for each community in achieving its vision of the future. In the course of environmental review, permitting, and approval, projects proposed in each jurisdiction are reviewed for consistency with adopted land use guidance documents. Projects listed in Draft EIR Chapter 4, Table 4-2 within the jurisdiction of Placer County would be reviewed to ensure consistency with the Placer County General Plan, MVCP, and Placer County Code, including the Zoning Ordinance. Placer County projects within the Tahoe Basin would also be reviewed by TRPA for compliance with the Regional Plan, Community Plan or PAS, and TRPA Code of Ordinances. Those projects located in the Town of Truckee would be reviewed by the Town for consistency with its 2025 General Plan policies and zoning ordinances. Because individual projects would be reviewed by land use agencies in the context of their particular general plans, zoning ordinances, codes, and other guidance documents prior to approval and implementation, resulting alterations of land use would be in accord with, and would implement the vision of each community. The cumulative			

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
impact would be less than significant. As described in Impact 5-1, above, the County would establish the planning framework for development of the 662-acre West Parcel Residential zone through adoption of the SPL-MVWPSP; would provide for preservation of the remaining 390 acres of the West Parcel as TPZ; and would amend the MVCP land use diagram to redesignate 670 acres of the East Parcel to Forest. The Specific Plan would result in the relocation of residential and commercial land use designations from the East Parcel to the West Parcel and the rezoning 662 acres of the West Parcel from Forest/TPZ to Residential/SPL-MVWPSP, with the remainder of the West Parcel (390 acres) remaining designated Forest and zoned TPZ. Development subsequent to the MVWPSP could convert up to 651.5 acres of the West Parcel's 662-acre Residential zone from forested land to residential, commercial, and recreational development. As compared to existing land use planning guidance in the MVCP, which contemplates development of the East Parcel, the proposed West Parcel development area would be located closer to existing similar developed land uses at the Northstar Resort; the allowable number of residential units would be reduced from 1,360 to 760; and density would be reduced from approximately 2 units per acre to approximately 1 unit per acre. The existing 670 acre East Parcel development area would be redesignated Forest and zoned TPZ, and the 6,376-acre East Parcel would be placed in conservation in perpetuity either by sale to a land trust or similar organization or by recordation of a conservation easement restricting use of the East Parcel. Therefore, the proposed MVWPSP would result in less potential development on a smaller footprint than the existing MVCP, and would remain consistent with the intent of the MVCP and the Placer County General Plan. (Draft EIR, p. 5-29.)			
Cumulative Impact 5-7: Cumulative compatibility with surrounding land uses (LS) Compatibility of land uses is inherently site-specific and focused on the land uses that surround a proposed project site. Most of the properties surrounding the MVWPSP project	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
site (Exhibit 5-1) are undeveloped coniferous forested lands that provide recreation opportunities with some scattered development. The Truckee-Tahoe Airport is located north of the East Parcel and the Northstar Resort is located northwest of the West Parcel. As described in MVWPSP Impact 5-2, implementation of the MVWPSP would result in the construction of residential uses, homeowner amenities, commercial uses, and utilities infrastructure in a forested area of the West Parcel that has historically been used for timber harvest and recreation. SR 267 borders the West Parcel to the north, and the Northstar Resort, which contains similar residential uses and densities to those proposed in the MVWPSP, lies about one mile to the west. Other lands surrounding the West Parcel to the south and southwest contain trails used for hiking, mountain biking, snowshoeing, and cross-country skiing. While proposed residential and commercial uses of the West Parcel would not be as compatible with dispersed recreation uses as would undeveloped forest the uses are not incompatible. Local trails would provide recreation opportunities for homeowners and visitors of the development, and the MVWPSP would minimize conflicts with recreational uses by siting development away from existing public trails and using natural features to screen buildings and attenuate noise. The remainder of the West Parcel would remain Forest, and the entire 6,376-acre East Parcel would remain or be redesignated Forest and be placed in conservation in perpetuity or sold to conservation groups, connecting approximately 50,000 acres of open space east of SR 267. (Draft EIR, pp. 5-29 to 5-30.)			
Cumulative Impact 5-8: Cumulative conflicts with forest land, Timberland Production Zone, or timber operations; cumulative conversion of forest land to non-forest use (LS) The Countywide General Plan EIR states that in 1986, Placer County contained approximately 423,000 acres of commercial forest land, with approximately 126,000 acres in TPZ. Much of this commercial timber harvest land is interspersed with national forest lands. The loss of commercial forest land under the General Plan Land Use Diagram was estimated to result in the conversion of 13,600 acres	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
(approximately 3 percent) of commercial forest land in the County by 2010, with additional conversion expected through 2040. With implementation of General Plan Policies (7.E.1 - 7.E.5) and Programs (7.6 –7.9), the County determined that the potential loss of production from commercial timberland would be less than significant (Placer County 1994). Within the Martis Valley, the 2003 MVCP documented that the MVCP area contains large areas of forest lands that are to be managed and protected for timberland and compatible uses, including the SPI-owned lands which are the subject of the proposed MVWPSP, and U.S. Forest Service lands within the Placer County portion of Martis Valley. These Forest Service lands consist of small, isolated parcels of various sizes, all of which lie within the Tahoe National Forest. Forest land conversion over nearly three decades has occurred, and continues to occur in accordance with Placer County projections. The MVWPSP would change the allowable land use on 662 acres of the West Parcel from Forest to Residential. Within that area, an estimated 651.5 acres of forest land (per the PRC Section 12220(g) definition) could be converted to non-forested, developed uses, effectively removing that forest land from potential timber harvest. The forest land affected would be primarily Sierran mixed conifer and white fir forest. These forest types are common and widely distributed throughout the region and elsewhere in the Sierra Nevada. Cumulatively, this conversion would be small, less than one percent relative to the approximately 400,000 acres available in the area (based on the anticipated conversion of 13,600 or more since 1986). This conversion would not cause regional forest conversion projections to be exceeded, and would not substantially reduce the quantity or quality of common forest habitat types in the region. Furthermore, timber harvest activities in the region would conform to applicable California Forest Practice Rules and to the specific terms and conditions of THPs for timber operations. As discussed in Impact 5-4, above, the MVWPSP would result in the designation of 390 acres of the West Parcel and the entire East Parcel (6,376 acres) as Forest land, all of which would be zoned TPZ, which restricts those lands to timber harvest and compatible uses. Therefore, the MVWPSP would increase land			

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
zoned TPZ in the Martis Valley by 8 acres. Additionally, a conservation easement would be established on the entire East Parcel or it would be sold to a land trust or similar organization, connecting an estimated 50,000 acres of open space and forested lands east of SR 267. This protection of contiguous, forested land around the proposed West Parcel development area would provide for continued availability of substantial forestry resources, and support the economic viability of surrounding forested lands. Although the MVWPSP would convert TPZ land, the total acreage of lands zoned TPZ would increase slightly, and the MVWPSP would not conflict with, or result in additional conversion of, forest land. (Draft EIR, pp. 5-30 to 5-31; see also Response to Comment IO7-4, IO31-37.)			
POPULATION, EMPLOYMENT, AND HOUSING			
Impact 6-1: Induce substantial population growth and housing demand during construction (LS) The proposed project would generate a temporary increase in employment in Martis Valley of up to an estimated 300 construction jobs during the most labor-intense phase of construction (i.e., Phase 2 when both residential and commercial construction would occur). The number of existing construction personnel in the region is considered sufficient to meet demand associated with the proposed project; therefore, this temporary increase in employment is not expected to generate substantial new population growth or generate the need for additional housing for construction workers. (Draft EIR, pp. 6-9 to 6-10; see also Response to Comment IO41-79.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 6-2: Induce substantial population growth during construction or operation (LS) The anticipated population at buildout of the MVWPSP, based on 760 proposed units and 2.5 persons per unit, would be 1,900 persons, which would be within the holding capacity (i.e., maximum growth anticipated) of Martis Valley (21,500± persons) and consistent with the vision identified in the MVCP.	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
(Draft EIR, pp. 6-10 to 6-11; see also Response to Comment IO18-8 and 9.)			
Impact 6-3: Provision of employee housing (LS) The project is expected to generate between 66.58 and 122.68 new full-time equivalent (FTE) employees. Consistent with Placer County General Plan Housing Policy C-2, the project must provide housing or an in-lieu fee to support housing for half the total FTE (between 33.29 and 61.34). MVWPSP Policies LU-HS1 through LU-HS5 require the project to comply with this requirement, which is anticipated to be met by providing for workforce housing. Consistent with Placer County General Plan Policy C-2, two parcels of land within the project site will be dedicated to Placer County. Up to 21 units out of the 760 unit total for the project could be built on these parcels for employee housing. (Draft EIR, pp. 6-11 to 6-12; Final EIR pp. 2-1 to 2-4; see also Response to Comment LA6-1, IO41-79.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 6-4: Cumulative population growth and housing demand induced by construction (LS) During construction, the proposed MVWPSP would generate a temporary increase in employment in Martis Valley of up to 300 construction jobs during the most intense year of construction (i.e., Phase 2 when both residential and commercial development would occur). Similarly, many of the cumulative projects identified in Draft EIR Chapter 4, Table 4-2, would also generate a temporary increase in employment associated with construction (e.g., Northstar Highlands Phase II, SR 89/Fanny Bridge Community Revitalization Project, Village at Squaw Valley, Resort at Squaw Creek Phase 2). It is likely that at least some of these projects would be constructed concurrently with the proposed project over the estimated 20-year buildout period. However, as identified in Draft EIR Chapter 6, Table 6-3 and described in Impact 6-1, in 2010, 8,400 residents in Placer County were employed in the construction industry (Placer County 2013b). In addition, the decline in construction jobs recorded since 2000 would indicate an available labor pool of construction trades people who are under-employed.	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
This existing Placer County construction industry labor pool is expected to be sufficient to meet the demand for construction workers that would be generated by the proposed project, plus other projects in the region that could be under construction concurrently. Further, construction employees could originate in other nearby communities in Truckee (Nevada County), El Dorado County, and from the Reno area. Because construction workers serving the proposed project and other projects in the region can be expected to come from an ample available construction labor pool, substantial population growth or increases in housing demand in the region as a result of these construction jobs is not anticipated. Furthermore, even if some construction workers from outside the region were employed at local project sites, construction workers typically do not change residences when assigned to a new construction site, and substantial permanent relocation of these workers to the area is not anticipated. Therefore, the construction of the MVWPSP, in combination with other past, present, and reasonably probable future projects, would not be expected to generate the need for substantial additional housing. (Draft EIR, p. 6-12; see also Response to Comment IO41-79.)			
Cumulative Impact 6-5: Cumulative population increase during operation (LS) As shown in Draft EIR Chapter 4, Table 4-1, cumulative buildout of anticipated projects would result in the construction of approximately 3,516 residential units and approximately 458,000 square feet of commercial square footage in the Truckee - North Shore Lake Tahoe region in addition to the 760 units and 34,500 square feet of commercial proposed by the MVWPSP. These types of projects would foster economic and population growth through the construction of additional housing and employment opportunities. Similar to the proposed project, these projects would predominantly support a transient resort population; however, a portion of the units would be used by year-round residents. Assuming 2.5 persons per dwelling unit (per the MVCP), the cumulative projects would result in approximately 8,790 persons. With the MVWPSP population of 1,900, the	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
cumulative population increase would be approximately 10,690 persons. The MVCP stated that, based on the 2000 census data, the permanent population in the Placer County MVCP area was approximately 1,185. The holding capacity of Martis Valley was estimated to be 21,500±persons; the increase of 10,690 in addition to an estimated 1,185 permanent residents is within the growth anticipated in the Placer County MVCP. Further, the reduction in the number of allowable units in the Martis Valley, from the 1,360 dwelling units allowed in the MVCP to the 760 units proposed in the MVWPSP (a reduction of 600 units), would represent a reduction in the maximum anticipated population by approximately 1,500 persons. In addition, as noted above and as discussed in the MVCP, the vast majority of the housing units in the area, as well as those proposed by the MVWPSP, are second or vacation homes that would not be occupied on a year-round basis. The mix of recreation-oriented development projects and transient population is consistent with the vision of the MVCP (see Impact 6-2, above). (Draft EIR, pp. 6-12 to 6-13; see also Response to Comment IO18-8 and 9.)			
Cumulative Impact 6-6: Cumulative provision of employee housing (LS) All proposed development projects in the Sierra Nevada region of Placer County are required to meet the 50 percent FTE employee housing requirement. In addition, the Town of Truckee (located in Nevada County) has established workforce housing requirements that, like Placer County, are intended to ensure an adequate supply of housing to meet the housing needs of all segments of the community. Article 7, Housing, of Title 18 of the Town of Truckee Development Code states that all commercial, industrial, institutional, recreational, residential resort, and other non-residential projects not identified as exempt shall include or provide workforce housing. Section 18.216.040 of Article 7 defines the ways in which workforce housing requirements may be met based on the FTE generated by projects in Truckee. Therefore, like the MVWPSP, cumulative projects (listed in Draft EIR Chapter 4, Table 4-1) with commercial and	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
employee-generating uses, such as the Village at Squaw Valley Specific Plan must construct workforce housing or pay the in-lieu fee to ensure that sufficient employee housing is provided in the region. (Draft EIR, p. 6-13; see also Response to Comment LA6-2, IO41-79.)			
BIOLOGICAL RESOURCES			
Impact 7-1: Disturbance or loss of common vegetation communities and wildlife habitats (LS) Under the MVWPSP, up to 536.5 acres of common vegetation communities and wildlife habitats could be permanently converted to single family residential, multifamily/residential cabins, and neighborhood commercial uses on the West Parcel, and removed to construct the main access road and the EVA road. Additional disturbances to common habitats would occur as a result of constructing and maintaining the proposed offsite utilities. Because these habitats are locally and regionally common and abundant, the proposed project would not substantially reduce the size, continuity, or integrity of any common vegetation community or habitat type or interrupt the natural processes that support common vegetation communities within the MVWPSP project site. Additionally, because the East Parcel would be preserved, 665.9 acres of conifer forest and other common habitats presently zoned for potential development would be conserved in perpetuity. (Draft EIR, pp. 7-43 to 7-45; see also Response to Comment A-1-5, IO31-21, IO42-2.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 7-2: Disturbance or loss of sensitive habitats (jurisdictional wetlands, riparian vegetation, aquatic habitat) (S) The project could result in direct removal and disturbance of sensitive habitats on the West Parcel and within offsite utilities corridors, including waters of the United States, waters of the State, and riparian habitat. The East Parcel, which includes 414.7 acres of sensitive habitats, 3.6 acres of sensitive habitats presently zoned for potential development, would be preserved. Implementation of the proposed MVWPSP would result in loss or degradation of jurisdictional waters of the U.S.	**Mitigation Measure 7-2a: Conduct delineation of waters of the United States and obtain authorization for fill and required permits** A preliminary wetland delineation was completed in June and October 2014 for the entire West Parcel (Ascent Environmental 2015) and the entire East Parcel; however, verification of the preliminary delineation by USACE had not occurred prior to the preparation of the Draft EIR. Potential wetlands and other waters of the U.S. within the offsite utilities corridor have not been delineated prior to the preparation of the Draft EIR. The following would apply, as applicable, to any potentially affected	LS	**Finding:** Compliance with Mitigation Measures 7-2a, and 7-2b which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring the applicant conduct delineation of waters of the United States, obtain authorization for fill and required permits, obtain and comply with a lake and streambed alteration agreement, and compensate for unavoidable loss of stream and riparian habitat. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project could result in disturbance or loss of sensitive habitats, including

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
and waters of the state, and stream and riparian habitat protected under Section 1602 of the Fish and Game Code on the West Parcel and within the offsite utilities corridors. These riparian and wetland habitats are considered sensitive because they are declining in quantity and condition throughout the region and because they provide important habitat functions. (Draft EIR, pp. 7-45 to 7-47; see also Response to Comment A-1-10, IO26-22, IO42-2 and 3.)	jurisdictional resources that have not been delineated or verified by USACE before project implementation, including areas that would be affected by the offsite utilities facilities. Before Improvement Plan approval for the start of onsite construction activities on any potentially affected jurisdictional resource that has not been previously delineated or verified by the USACE, a qualified biologist shall survey the project site for sensitive natural communities. Sensitive natural communities or habitats are those of special concern to resource agencies or those that are afforded specific consideration, based on Section 404 of the CWA and other applicable regulations. If sensitive natural communities or habitats that are afforded specific consideration, based on Section 404 of the CWA are determined to be present, a delineation of waters of the United States, including wetlands that would be affected by the project, will be prepared by a qualified biologist through the formal Section 404 wetland delineation process. The delineation will be submitted to and verified by USACE. If, based on the verified delineation, it is determined that fill of waters of the United States would result from implementation of the project, authorization for such fill will be secured from USACE through the Section 404 permitting process. The acreage of riparian habitat (deciduous riparian vegetation) that would be removed or disturbed during project implementation will be quantified and replaced or restored/enhanced to meet the no net-loss standard in accordance with USACE requirements. Habitat restoration, enhancement, and/or replacement will be at a location and by methods agreeable to USACE as determined during the permitting processes for CWA Section 404. **Mitigation Measure 7-2b: Obtain and comply with a lake and streambed alteration agreement; compensate for unavoidable loss of stream and riparian habitat** The following measures shall be implemented to avoid or compensate for the loss or degradation of stream or riparian habitat, ensure consistency with Fish and Game Code Section 1602, and further reduce potential adverse effects on riparian habitats:		jurisdictional wetlands, riparian vegetation, and aquatic habitat. Implementation of mitigation measures 7-2a and 7-2b will reduce project-related impacts to a less-than-significant level by requiring proper authorization and permits prior to construction activities and compensation for unavoidable losses which will ensure protection of sensitive habitats. Prior to the start of onsite construction activities, a qualified biologist shall survey the project site for sensitive natural communities, and, if necessary, prepare a delineation of waters of the United States. All required authorizations and required permits will be obtained by the project applicant. If construction activities trigger the need for a Streambed Alteration Agreement, the project applicant shall obtain one from CDFW before Improvement Plan approval, and conform construction activities to that agreement. The project applicant shall compensate for permanent loss of riparian habitat at a minimum 1:1 ratio through contributions to a CDFW approved wetland mitigation bank or a Compensatory Stream and Riparian Mitigation and Monitoring Plan for creating or restoring in-kind habitat in the surrounding area. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 7-45 to 7-49; see also Response to Comment A-1-10, IO26-22, IO41-13 and IO42-2 and 3.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	• The project developer shall notify CDFW before commencing any activity within the bed, bank, or riparian corridor of any waterway. If activities trigger the need for a Streambed Alteration Agreement, the proponent will obtain an agreement from CDFW before Improvement Plan approval. The project proponent shall conduct construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect the fish and wildlife resources, when working within the bed or bank of waterways that function as a fish or wildlife resource or in riparian habitats associated with those waterways. • The project developer shall compensate for permanent loss of riparian habitat at a minimum of a 1:1 ratio through contributions to a CDFW approved wetland mitigation bank or through the development and implementation of a Compensatory Stream and Riparian Mitigation and Monitoring Plan for creating or restoring in-kind habitat in the surrounding area. If mitigation credits are not available, stream and riparian habitat compensation shall include establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the existing riparian corridor along streams in the project site and surrounding areas. Construction activities and compensatory mitigation shall be conducted in accordance with the terms of a streambed alteration agreement as required under Section 1602 of the Fish and Game Code. • The Compensatory Stream and Riparian Mitigation and Monitoring Plan shall include the following: o identification of compensatory mitigation sites and criteria for selecting these mitigation sites; o in kind reference habitats for comparison with compensatory riparian habitats (using performance and success criteria) to		

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	document success; o monitoring protocol, including schedule and annual report requirements (Compensatory habitat shall be monitored for a minimum of 5 years from completion of mitigation, or human intervention (including recontouring and grading), or until the success criteria identified in the approved mitigation plan have been met, whichever is longer.); o ecological performance standards, based on the best available science and including specifications for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80% survival of planted riparian trees and shrubs by the end of the five-year maintenance and monitoring period or dead and dying trees shall be replaced and monitoring continued until 80 percent survivorship is achieved; o corrective measures if performance standards are not met; o responsible parties for monitoring and preparing reports; and o responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions (Draft EIR, pp. 7-48 to 7-49.)		
Impact 7-3: Direct or indirect effect on or loss of special-status plant species (PS) Implementing the MVWPSP would result in construction of new facilities in habitats that may provide suitable habitat for special-status plants on the West Parcel and within the offsite utilities corridors. If special-status plants are present in those areas, project construction could cause the disturbance or loss of those species. (Draft EIR, p. 7-49.)	**Mitigation Measure 7-3: Avoid, minimize, and compensate for effects on special-status Plants** The project developer shall implement the following measures to reduce potential impacts on special-status plants: • Before commencement of any project construction for each phase of construction and during the blooming period for the special-status plant species with potential to occur on the project site, a qualified botanist shall conduct protocol-level surveys for special-status plants in areas where potentially suitable habitat would be removed or disturbed by project activities. • If no special-status plants are found, the	LS	**Finding:** Compliance with Mitigation Measure 7-3, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring protective measures for special-status plants during construction and restoration plans. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project could cause disturbance or loss of special-status plants if such plants are present in the development areas. To reduce this potentially significant impact to a less than significant level, the project developer is required to conduct preconstruction surveys, and if special-status plants are found, shall consult with CDFW as to the proper mitigation, including, but not limited to, preserving and enhancing existing populations, or creating offsite populations to

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	botanist shall document the findings in a letter report to Placer County and CDFW and no further mitigation will be required. • If special-status plant species are found that cannot be avoided during construction, the project applicant shall consult with CDFW, as appropriate depending on species status, to determine the appropriate mitigation measures for direct and indirect impacts that could occur as a result of project construction and will implement the agreed-upon mitigation measures to achieve no net loss of occupied habitat or individuals. Mitigation measures may include, but are not limited to, preserving and enhancing existing populations, creating offsite populations on project mitigation sites through seed collection or transplantation, and/or restoring or creating suitable habitat in sufficient quantities to achieve no net loss of occupied habitat and/or individuals. Potential mitigation sites could include suitable locations within or outside of the project area. A mitigation and monitoring plan shall be developed describing how unavoidable losses of special status plants will be compensated. • If relocation efforts are part of the mitigation plan, the plan shall include details on the methods to be used, including collection, storage, propagation, receptor sit preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. • Success criteria for preserved and compensatory populations shall include: o The extent of occupied area and plant density (number of plants per unit area) in compensatory populations will be equal to or greater than the affected occupied habitat. o Compensatory and preserved populations will be self-producing. Populations will be considered self-producing when: ▪ plants reestablish annually for a minimum of five years with no human intervention such as supplemental		achieve no net loss of occupied habitat and/or individuals. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 7-49 to 7-51; see also Response to Comment A-1-10, IO26-22, IO41-15.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	seeding; and ▪ reestablished and preserved habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types in the project vicinity. • If offsite mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. (Draft EIR, pp. 7-50 to 7-51.)		
Impact 7-4: Indirect effects on fish and wildlife species through introduction and spread of invasive plants (PS) Construction of residential and commercial facilities on the West Parcel, and construction and maintenance of offsite utilities, have the potential to introduce and spread terrestrial and aquatic invasive plants during construction and revegetation periods. These activities would temporarily create areas of open ground that could be colonized by nonnative, invasive weed species from inside or outside of the project site. Noxious weeds and other invasive plants could inadvertently be introduced or spread in the project area during grading and construction activities, if nearby source populations passively colonize disturbed ground, or if construction and personnel equipment is transported to the site from an infested area. Soil, vegetation, and other materials transported to the study area from offsite sources for best management practices (BMPs), revegetation, or fill for project construction could contain invasive plant seeds or plant material that could become established in the study area. Additionally, terrestrial and aquatic invasive species currently present in or near the project site have the potential to be spread by construction disturbances. The introduction and spread of terrestrial or aquatic invasive species would degrade terrestrial	**Mitigation Measure 7-4: Implement invasive plant management practices during project construction** The project developer shall implement the following invasive plant management practices during project construction. • A qualified biologist will conduct a preconstruction survey to determine whether any populations of invasive plants are present within areas proposed for ground-disturbing activities. This could be conducted in coordination with the focused special-status plant survey recommended above under Mitigation Measure 7-3. • Before construction activities begin, invasive plant infestations will be treated where feasible. Treatments will be selected based on each species ecology and phenology. Control measures may include herbicide application, hand removal, or other means of mechanical control. This would help eliminate the threat of spreading the species throughout the project site and adjacent areas. All treatment methods-including the use of herbicides-will be conducted in accordance with the law, regulations, and policies governing the land owner. In areas where treatment is not feasible, noxious weed areas will be clearly flagged or fenced to clearly delineate work	LS	**Finding:** Compliance with Mitigation Measure 7-4, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring implementation of invasive plant management practices during project construction. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Development and operation of the Project has the potential to introduce and spread invasive plant species. Implementation of mitigation measure 7-4 will reduce Project related impacts to less than significant level by requiring preconstruction surveys and treatment of invasive plant infestations where feasible. Vehicles and equipment will be cleaned prior to introduction to the site, fill and seeds will be certified weed-free and/or locally sourced where feasible, and post construction monitoring and treatment will be conducted where feasible. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 7-51 to 7-53; see also Response to Comment A-1-10.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
plant, wildlife, and aquatic habitats within the study area. (Draft EIR, pp. 7-51 to 7-52.)	exclusion. Treatments will be implemented by a qualified biologist or other qualified specialist approved by Placer County. • Vehicles and equipment will arrive at the project area clean and weed-free. All equipment entering the project site from weed-infested areas or areas of unknown weed status will be cleaned of all attached soil or plant parts before being allowed into the project site. Vehicles and equipment will be cleaned using high-pressure water or air at designated weed-cleaning stations after exiting a weed-infested area. Cleaning stations will be designated by a botanist or noxious weed specialist and located away from aquatic resources • To ensure that fill material and seeds imported to the study area are free of invasive/noxious weeds, the project will use onsite sources of fill and seeds whenever available. Fill and seed materials that need to be imported to the study area will be certified weed-free. In addition, only certified weed-free imported materials (or rice straw in upland areas) will be used for erosion control. • If designated weed-infested areas are unavoidable, the plants will be cut, if feasible, and disposed of in a landfill in sealed bags or disposed of or destroyed in another manner acceptable to Placer County or other agency as appropriate. If cutting weeds is not feasible, layers of mulch, degradable geotextiles, or similar materials will be placed over the infestation area to minimize the spread of seeds and plant materials by equipment and vehicles during construction. These materials will be secured so they are not blown or washed away. • Locally collected native seed sources for revegetation shall be used when possible. Plant and seed material will be collected from or near the study area, from within the same watershed, and at a similar elevation when possible and with approval of the appropriate authority (e.g., USFS botanist for collection on USFS land). • After construction is completed for each project phase, the affected project site shall be monitored on an annual basis for infestations		

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	of invasive weeds until the restored vegetation has become fully established. If new populations of invasive weeds are documented during monitoring, they will be treated and eradicated to prevent further spread. Monitoring by a qualified biologist shall occur for up to three years (as feasible) subsequent to project implementation. (Draft EIR, pp. 7-52 to 7-53.)		
Impact 7-5: Direct or indirect effects on special-status wildlife species or reduction of habitats or restriction of range of wildlife species or interference with the movement of native resident or migratory wildlife species or wildlife corridors (PS) Project construction for the MVWPSP could result in the loss of individuals or nests, or disruptions to nesting attempts of yellow warbler, olive-sided flycatcher, and long-eared owl; the removal of an active roost site for, or injury to, pallid bat and western red bat; and removal or disturbances to active breeding sites of Sierra Nevada mountain beaver. For other special-status species, although project implementation would result in habitat loss and could adversely affect individuals locally, the magnitude and intensity of potential adverse effects are not expected to affect the species' distribution, active breeding sites, breeding productivity, viability, or regional populations. (Draft EIR, pp. 7-53 to 7-60; see also Response to Comment A-1-10, IO26-22, IO31-21, IO42-4.)	**Mitigation Measure 7-5a: Conduct preconstruction surveys for nesting special-status birds, and implement a limited operating period if necessary** For construction activities that would occur in suitable habitat during the nesting season (generally April 1–August 31, depending on species, snowpack, and other seasonal conditions), a qualified wildlife biologist shall conduct focused surveys for yellow warbler, olive-sided flycatcher, and long-eared owl nests no more than 14 days before construction activities are initiated each construction season. The preconstruction survey for active nests will be conducted using a nest-searching technique appropriate for the species, as determined by a qualified biologist. For example, for yellow warbler, an appropriate technique involves first conducting point counts in suitable riparian habitat to determine occupancy, followed by nest searching if the species is present. For long-eared owl, surveys typically involve tape playbacks of recorded long-eared owl calls. **Mitigation Measure 7-5b: Conduct pre-construction surveys for special-status bats, avoid removal of important roosts, and implement a limited operating period if necessary** Bat surveys shall be conducted by a qualified wildlife biologist within 14 days before any tree removal or clearing during each construction season. Locations of vegetation and tree removal or excavation will be examined for potential bat roosts. Specific survey methodologies will be determined in coordination with CDFW, and may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g.,	LS	**Finding:** Compliance with Mitigation Measure 7-5a, 7-5b, and 7-5c, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring preconstruction surveys and limited operating periods, if necessary. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project could have direct or indirect effects on several special status wildlife species. Including the yellow warbler, olive-sided flycatcher, long-eared owl, pallid bat, western red bat, and Sierra Nevada mountain beaver. Mitigation measure 7-5a requires preconstruction surveys for yellow warbler, olive-sided flycatcher, and long-eared owl nests. Mitigation measure 7-5b requires preconstruction surveys, particularly before tree removal activities, for potential bat roosts. Removal of any significant roost sites will be avoided to the extent feasible, and passive exclusion devises will be used at affected roost sites except during periods of sensitive activity. Mitigation measure 7-5c requires preconstruction surveys for Sierra Nevada mountain beaver burrows. Limited operating periods and appropriate buffers will be put in place if active burrows/breeding sites are identified within 250 feet of project activities. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 7-53 to 7-61; see also Response to Comment A-1-10, IO26-22, IO31-21, IO41-16 and 17, IO42-4.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	Sonobat, Anabat). Removal of any significant roost sites located will be avoided to the extent feasible. If it is determined that an active roost site cannot be avoided and will be affected, bats will be excluded from the roost site before the site is removed. The biologist shall first notify and consult with CDFW on appropriate bat exclusion methods and roost removal procedures. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not reenter), or sealing roost entrances when the site can be confirmed to contain no bats. Once it is confirmed that all bats have left the roost, crews will be allowed to continue work in the area. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during winter hibernation or while females in maternity colonies are nursing young [generally, during late spring and summer]). If a hibernation or maternity roosting site is discovered, the project developer will consult with CDFW to establish appropriate exclusionary buffers until all young are determined to be volant (i.e., able to fly) by a qualified biologist. Once it is determined that all young are volant, passive exclusion devices will be installed and all bats will be allowed to leave voluntarily. Once it is determined by a qualified biologist that all bats have left the roost, crews will be allowed to work within the buffer zone. **Mitigation Measure 7-5c: Conduct pre-construction surveys for Sierra Nevada mountain beaver and implement a limited operating period, if necessary** A qualified biologist shall conduct focused surveys for the presence/absence of active burrows for Sierra Nevada mountain beaver in suitable riparian habitat within proposed impact areas and a 250-foot buffer (if feasible). The preconstruction survey for active burrows shall be conducted no more than 30 days before construction activities are initiated each construction season. Placer County shall be notified of the results of the preconstruction surveys. If active breeding/burrow sites are identified within 250 feet of project activities, the project applicant shall implement limited operating		

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	periods (LOP) for all such burrows before commencement of any project construction activities to avoid construction or access related disturbances to breeding activities of Sierra Nevada mountain beaver. An LOP constitutes a period during which project-related activities (i.e., vegetation removal, earth moving, and construction) will not occur, and will be imposed between February 1 and July 31 within 250 feet of any active burrow sites. The period of the LOP, area within which it is implemented (e.g., 250-foot buffer), and activities allowed or prohibited within the LOP may be adjusted through consultation with CDFW and/or Placer County. Placer County shall be notified of the establishment of buffers and LOPs required to minimize or avoid impacts to Sierra Nevada mountain beaver. (Draft EIR, pp. 7-60 to 7-61.)		
Cumulative Impact 7-6: Disturbance or loss of common vegetation communities and wildlife habitats (LS) The proposed MVWPSP together with the cumulative projects would permanently convert common vegetation communities and wildlife habitats to other uses. The majority of disturbance or loss from MVWPSP would occur within three conifer forest types – Sierran mixed conifer forest, white fir forest, and white fir-red fir forest. This conversion, when combined with the cumulative projects within these forest types, could contribute to the cumulative reduction of these vegetation communities within the region. Because these habitats are locally and regionally common and abundant, and because the impact is reduced by ongoing forest restoration projects that will result in long-term improvement to the health of these forest types, the cumulative impact is less than significant. Additionally, because the East Parcel would be permanently preserved, conifer forest and other common habitats presently zoned for development on that parcel would be conserved in perpetuity. The West Parcel would also include 390 acres designated as Forest and zoned TPZ, which would remain open space**.** (Draft EIR, p. 7-62.)	No mitigation is required	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 7-7: Cumulative disturbance or loss of sensitive habitats	No mitigation required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002;

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
(LS) Construction of residential and commercial development, access roads, and offsite utilities proposed under the MVWPSP in combination with other cumulative development in the region could result in permanent loss or temporary disturbance of freshwater emergent wetland, perennial stream, wet meadow, and montane riparian habitats. These potential impacts would be cumulatively significant. Construction activities for the MVWPSP and other cumulative projects would be required to comply with existing federal, state, and local regulations and permitting requirements that protect wetland, riparian, and other sensitive habitats through avoidance, restoration, enhancement, and other means such that sensitive habitat values are maintained. For MVWPSP, implementation of Mitigation Measures 7-2a and 7-2b requires that sensitive habitat is avoided to the extent feasible and that sensitive habitats that cannot be avoided are restored following construction, or if the habitat cannot be restored, that the project proponent compensates for unavoidable losses in a manner that results in no net loss of sensitive habitats. Additionally, the MVWPSP proposes to preserve the East Parcel, which includes substantial acreage of sensitive habitats (see Draft EIR Chapter 7, Table 7-13). Overall, the quality and extent of sensitive habitats is higher on the East Parcel than on the West Parcel. The East Parcel supports larger and more functional areas of riparian, wetland, meadow, and stream complexes that provide greater habitat value than those on the West Parcel.) (Draft EIR, p. 7-62; see also Response to Comment IO26-21, IO42-7.)			CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 7-8: Direct or indirect effect on or loss of special-status plant species (LS) The cumulative projects include residential and commercial development, recreation facilities, resort development, and forest vegetation and fuels treatment that could affect habitat for special-status plants in the region. Habitat for most special-status plants in the region is primarily within riparian and wetland settings, and to a lesser degree within some upland conifer forest and shrub/meadow communities (see Draft EIR Chapter 7, Table 7-	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
5). Development project areas that overlap with these habitats would be expected to have some level of adverse effects on these resources; however, forest vegetation and fuels treatment projects are expected to result in long-term habitat enhancement that may benefit those special-status plant species associated with forest habitats. Overall, the effects on special-status plant species are considered cumulatively significant. The proposed MVWPSP would result in construction of new facilities in areas that may provide suitable habitat for special-status plants on the West Parcel and within the offsite utilities corridors. If special-status plants are present in those areas, project construction could cause the disturbance or loss of those species. When combined with the cumulative projects listed above with similar biological effects, implementation of the MVWPSP could contribute to an adverse cumulative effect on special-status plant species. However, project-specific Mitigation Measure 7-3 requires that potential loss of special-status plants is avoided or minimized or that compensation is provided. With implementation of this mitigation, the MVWPSP would not substantially affect the distribution, population viability, or the regional population of any special-status plant species; or cause a change in species diversity locally or regionally. (Draft EIR, pp. 7-62 to 7-63.)			
Cumulative Impact 7-9: Cumulative indirect effects on fish and wildlife species through introduction and spread of invasive plants (LS) Past projects and activities have resulted in the introduction and spread of various noxious weeds and invasive plant species in the Tahoe-Truckee region, resulting in habitat degradation and other adverse effects on biological resources. The current presence of noxious weeds and invasive plant species in the project region is considered a significant cumulative impact. Implementation of the MVWPSP together with the cumulative projects have the potential to introduce and spread noxious weeds and invasive plant species during project construction and post-construction revegetation activities. Nearby source populations could	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
passively colonize disturbed ground, or attach to personnel or equipment and be transported to the site from an infested area. Soil, vegetation, and other materials transported to the project site from offsite sources for BMP, revegetation, or fill for project construction could contain invasive plant seeds or plant material that could become established in the project area. Additionally, terrestrial and aquatic invasive plant species currently present in or near the project site have the potential to be spread by construction disturbances. Policies, regulations, and programs to eradicate invasive plants and prevent their spread are currently in place and serve to reduce the potential for their adverse effects on native fish and wildlife. Without mitigation, implementation of the proposed project could contribute to the existing significant cumulative effect. Mitigation Measure 7-4 requires the implementation of invasive plant and aquatic invasive species management practices during project construction to prevent the inadvertent introduction and spread of invasive plants and aquatic invasive species. (Draft EIR, p. 7-63.)			
Cumulative Impact 7-10: Cumulative direct or indirect effects on special-status wildlife species or reduction of habitats or restriction of range of wildlife species or interference with the movement of native resident or migratory wildlife species or wildlife corridors (LS) Implementation of the MVWPSP and the cumulative projects in the region would result in conversion and fragmentation of habitat, introduction of additional traffic, population, sources of noise and air pollutant emissions, and other effects that could disturb the foraging and movement patterns of individuals, affect breeding activities and reproductive success, cause direct mortality or injury, and disturb or remove suitable habitat for some special-status wildlife species. However, forest vegetation and fuels treatment projects are expected to result in long-term habitat enhancement that would benefit wildlife species. When combined with the cumulative projects with similar biological effects, implementation of the MVWPSP without mitigation could have an adverse cumulative effect on special-status wildlife species.	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
However, Mitigation Measures 7-5a and 7-5b require conducting focused preconstruction surveys for special-status wildlife and, if needed, limiting construction operations during the sensitive breeding periods. Implementation of these measures would avoid the potential disturbance or loss of individuals, nests, and roost sites of these species during construction of MVWPSP. In terms of habitat loss, the common forest and other upland communities that would be affected (e.g., Sierran mixed conifer, Jeffrey pine, and white fir) are abundant and widely distributed locally and regionally. Because of the abundance of these habitat types, implementation of the MVWPSP, when combined with those cumulative projects that are located in these forest types, would not cumulatively threaten, regionally eliminate, or contribute to a substantial reduction in the distribution or abundance of habitat for special-status wildlife species associated with these communities in the project region (e.g., olive-sided flycatcher, long-eared owl, pallid bat). Riparian and wetland habitats that support special-status species are far less common in the region than the forest types listed above and may be lost or degraded by cumulative project activities. When combined with cumulative development that has similar biological effects, implementation of the MVWPSP without mitigation could have an adverse cumulative effect on the riparian and wetland habitat of special-status wildlife species. Mitigation Measures 7-2a and 7-2b require that riparian and wetland habitats, which could support yellow warbler and Sierra Nevada mountain beaver, are avoided to the extent feasible and that sensitive habitats that cannot be avoided are restored following construction; or, if the habitat cannot be restored, that the project proponent compensates for unavoidable losses in a manner that results in no net loss of sensitive habitats. Implementation of these mitigation measures for the MVWPSP would result in a no net loss of habitat for these riparian and wetland special status species. With recommended mitigation measures, the project would not substantially affect the distribution, breeding productivity, population			

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
viability, or the regional population of any special-status species; nor would it cause a change in species diversity locally or regionally, either directly through loss of individuals or indirectly through habitat modification. (Draft EIR, pp. 7-63 to 7-64.)			
CULTURAL RESOURCES			
Impact 8-1: Change in the significance of historical resources (NI) The record search revealed no historical resources within the MVWPSP project site and the pedestrian survey did not identify any historical resources. (Draft EIR, p. 8-12; see also Response to Comment IO14-1.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 8-2: Disturb unique archaeological resources (PS) Implementation of the MVWPSP could cause a substantial change in the significance of a unique archaeological resource. The records searches revealed that two archaeological resources (P-31-131 and P-31-132) have been determined eligible for listing in the NRHP and CRHR. The pedestrian survey disclosed a total of 58 archeological resources (33 of which are located on the West Parcel and 13 of which were identified as part of the survey for the offsite utilities), which have not yet been evaluated for NRHP and CRHR eligibility. Also, project-related ground-disturbing activities could cause a substantial change in the significance of an as-yet-undiscovered unique archaeological resource as defined in the State CEQA Guidelines Section 15064.5. (Draft EIR, pp. 8-12 to 8-13.)	**Mitigation Measure 8-2a: Complete and implement subsequent evaluation recommendations prior to ground disturbing activities** • Phase 2 Evaluation Report: Prior to the application for each small lot tentative map or conditional use permit, or approval of offsite infrastructure alignments, and prior to improvement plan approval, a Phase 2 Evaluation Report shall be prepared for the archaeological resources within the area subject to the application and identified in the Martis Valley West Parcel Phase 1B: Heritage Resources Preliminary Field Inventory Report and the Martis Valley West Parcel Specific Plan Offsite Utilities Connection and Fire road Heritage Resource Inventory Phase 1A and Phase 1B Preliminary Report. In the Phase 2 Evaluation Report, resources will be evaluated and recorded on standard Department of Parks and Recreation (DPR) Primary Record forms (Form DPR 523) in accordance with one or more national, state and/or regional criteria and a determination of eligibility/ineligibility to the NRHP and/or CRHR and/or local register will be recommended. The Phase 2 Evaluation Report shall be completed by a qualified archaeologist who meets the Secretary of the Interior's professional qualifications for archaeology and submitted to the Placer County Planning Services Division with the first submittal of improvement plans. • Phase 3 Evaluation Report: If significant	LS	**Finding:** Compliance with Mitigation Measure 8-2a, 8-2b, and 8-2c, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring subsequent evaluations prior to ground disturbing activities, a worker environmental awareness program, and work stoppages in the event of an archeological discovery. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project could cause a substantial change in the significance of a unique archaeological resource, or an as-yet-undiscovered unique archaeological resource. Mitigation measure 8-2a would require evaluation reports to determine if significant archaeological resources are present and the project impacts on those resources, as well as adopting appropriate avoidance measures. Mitigation measure 8-2b would require the implementation of a Worker Environmental Awareness Program to train construction personnel and supervisors on how to identify potential resources and what to do if they are discovered on site. Mitigation measure 8-2c would require halting all ground-disturbing work in the area if unique archaeological resources are discovered, and a qualified archaeologist will work with the applicant to avoid disturbing the resources to the extent feasible and follow proper procedure in recording the discovery of the resources. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 8-12 through 8-14; Final EIR, pp. 2-10 to 2-11; see also Response to Comment IO14-1.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	archaeological resources are identified in the Phase 2 Evaluation Report, an assessment of project impacts on these resources will be included in a Phase 3 Evaluation Report, as well as detailed measures to avoid impacts. Avoidance measures could include, but are not limited to, actions such as re-routing of the sewer line around the resources, directional drilling under the resource, site testing to confirm the boundary of a significant resource and avoidance of that boundary, and construction monitoring in sensitive areas to prevent disturbance of currently unknown subsurface resources. Adopted avoidance measures will be implemented as appropriate during project design and construction. If project redesign to completely avoid impacts is infeasible, then measures will be developed and implemented in coordination with Placer County Planning Services Division and appropriate Native American representatives to recover the significant information contained within these archaeological resources before the resource site is disturbed. Testing or data recovery shall be the preferred method of dealing with the affected resources. The Phase 3 Evaluation Report and any data recovery (if needed) shall be completed by a qualified archaeologist who meets the Secretary of the Interior's professional qualifications for archaeology. Mitigation or data recovery typically involves additional archival research, field excavation, photo documentation, mapping, and/or archaeological monitoring. If a Phase 3 Evaluation Report is needed, it will be submitted to the Placer County Planning Services Division concurrent with the submittal of improvement plans. Any avoidance and data recovery measures shall be developed in consultation with the archeologist and finalized in consultation with the Placer County Planning Services Division to confirm the effectiveness of the measures. **Mitigation Measure 8-2b: Develop and implement a Worker Environmental Awareness Program** Prior to improvement plan approval, the project applicant shall design and implement a Worker Environmental Awareness Program (WEAP) that shall be provided to all construction		

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	personnel and supervisors who will have the potential to encounter and alter heritage and cultural resources. The WEAP shall be submitted to the Planning Services Division and shall describe, at a minimum: • types of heritage and cultural resources expected in the project area; • types of evidence that indicate heritage or cultural resources might be present (e.g., ceramic shards, trash scatters, lithic scatters, mineralized, partially mineralized, or unminerialized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints); • what to do if a worker encounters a possible resource; • what to do if a worker encounters bones or possible bones; and • penalties for removing or intentionally disturbing heritage and cultural resources, such as those identified in the Archeological Resources Protection Act. **Mitigation Measure 8-2c: Stop work, in the event of an archaeological discovery** In the event that evidence of any paleontological, prehistoric or historic-era subsurface archaeological features or deposits are discovered during construction-related earth-moving activities (e.g., ceramic shard, trash scatters, lithic scatters, mineralized, partially mineralized, or unminerialized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. The Placer County Planning Services Division and the Department of Museums will be notified of the potential find and a qualified archeologist shall be retained to investigate. If the find is an archeological site, the appropriate Native American group shall be notified. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, the Planning Services Division shall be notified and a data recovery plan shall be		

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the project applicant to avoid disturbance to the resources, and if complete avoidance is not feasible in light of project design, economics, logistics, and other factors, follow accepted professional standards in recording any find including submittal of the standard DPR Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area (the NCIC). (Draft EIR, pp. 8-13 to 8-14; Final EIR, pp. 2-10 to 2-11; see also Response to Comment IO14-1.)		
Impact 8-3: Disturb undiscovered or unrecorded human remains (PS) Although unlikely, construction and excavation activities associated with development of the MVWPSP could unearth previously undiscovered or unrecorded human remains, if they are present. (Draft EIR, p. 8-14.)	**Mitigation Measure 8-3: Stop work, if human remains are discovered** California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Sections 7050.5 and 7052 and California Public Resources Code Section 5097. If human remains are discovered during any demolition or construction activities, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the project applicant shall notify the Placer County Coroner and the Native American Heritage Commission ("NAHC") immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant (MLD), if any, identified by the NAHC. Following the coroner's findings, the archaeologist, and the	LS	**Finding:** Compliance with Mitigation Measure 8-3, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring a halt to ground-disturbing activities if human remains are discovered, and consultation with the coroner, an archaeologist, and the Most Likely Descendant. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The construction and excavation activities associated with development of the Project could unearth previously undiscovered, or unrecorded human remains. Mitigation measure 8-3 will require, in compliance with State law, a halt to all ground-disturbing activities in the area where human remains are discovered. The project applicant shall notify the County Coroner and the NAHC immediately. If the remains are determined to be Native American, a professional archaeologist will investigate the site and consult with the Most Likely Descendant (MLD) to determine proper treatment and disposition of the remains; and take appropriate steps to ensure that additional human remains are not disturbed. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 8-14 to 8-15.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	NAHC-designated MLD shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California Public Resources Code Section 5097.94. (Draft EIR, pp. 8-14 to 8-15.)		
Impact 8-4: Affect unique ethnic cultural values or restrict existing religious or sacred uses within the project area (NI) The Washoe Tribe of Nevada and California and Marcos Guerrero of the UAIC were contacted regarding the project and no unique ethnic values or existing religious or sacred uses of the project site or vicinity were identified that would be affected by the project. (Draft EIR, p. 8-15.)	No Mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 8-5: Cumulative impacts on unique archaeological resources (LS) The cumulative context for archaeological resources is the Truckee-Tahoe Basin portion of the Washoe territory. Based on previous cultural resource surveys and research, the Truckee-Tahoe Basin has been inhabited by prehistoric and historic people for thousands of years. The proposed MVWPSP, in combination with other development in the Truckee-Tahoe Basin could contribute to the loss of significant archaeological resources, such as P-31-131 and P-31-132, which have previously been recommended as eligible for listing in the NRHP. Because all significant cultural resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant cultural resources, all adverse effects erode a dwindling resource base. The loss of any one archaeological site could affect the scientific value of others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part. The cultural system is represented archaeologically by the total inventory of all sites and other cultural remains in the region. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of cultural resources, rather	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
than on a single project or parcel boundary. Proper planning and appropriate mitigation can help to capture and preserve knowledge of such resources and can provide opportunities for increasing our understanding of the past environmental conditions and cultures by recording data about sites discovered and preserving artifacts found. Federal, state, and local laws are also in place, as discussed above, that protect these resources in most instances. Even so, it is not always feasible to protect these resources, particularly when preservation in place would make projects infeasible, and for this reason the cumulative effects of past and present projects in the Truckee-Tahoe Basin could result in a potentially significant cumulative impact on cultural resources. Without mitigation, implementation of the MVWPSP has the potential to cause a substantial change in the significance of archaeological resources that are unique and nonrenewable members of finite classes. However, with implementation of Mitigation Measures 8-2a, 8-2b, and 8-2c, adverse effects on currently known archeological resources and potentially newly discovered archeological resources would be avoided. (Draft EIR, pp. 8-15 to 8-16.)			
Cumulative Impact 8-6: Cumulative impacts on human remains (LS) Because of the likelihood that any undiscovered or unknown human remains would be Native American in origin, the cumulative context for human remains is the Truckee-Tahoe Basin portion of the Washoe territory. As discussed above under Cumulative Impact 8-1, the Truckee-Tahoe Basin has been inhabited by prehistoric and historic people for thousands of years. The loss of any one archaeological site or human remains could affect the scientific value of others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part. The proposed MVWPSP, in combination with other development in the Truckee-Tahoe Basin could contribute to the disturbance of human remains due to project-related construction activities. However, with	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
implementation of Mitigation Measure 8-3, adverse effects on undiscovered or unknown human remains would be avoided.) (Draft EIR, p. 8-16.)			
VISUAL RESOURCES			
Impact 9-1: Adverse effects on scenic vistas (LS) Implementation of the project would result in the construction of up to 760 residential units, up to 34,500 square feet of commercial building space, up to 22,000 square feet of homeowner amenities (e.g., parks, fitness centers), and new roadways accessing the structures and facilities. The project would convert portions of a 662 acre forested site into a residential neighborhood, which would modify visual characteristics through tree removal, vegetation clearing, and grading, which could affect scenic vistas. Portions of the development on the West Parcel development area would be within scenic vistas that are visible from Martis Valley and Northstar. However, the project site's topography would screen much of the development from views from public gathering spaces and recreation areas, and development would be required to comply with specific and enforceable standards that require development to be designed with colors, materials, screening, and site layouts that would blend with the natural environment. The West Parcel development area would be largely screened from view from SR 267, the Fibreboard Freeway, and the Tahoe Rim Trail, and would not affect scenic vistas from those areas. As seen from Martis Valley, project components would be largely screened by existing vegetation and topography and less visible than existing features in the foreground (e.g., Northstar ski trails, transmission lines and towers). Project features visible from Northstar would appear as partially screened, dark/earth tone-colored structures nestled in distant trees. Structures would not appear silhouetted on the ridge, nor would obvious clearings or linear or angular patterns result from the project. No structures would be visible from Lake Tahoe, and tree removal visible from Lake Tahoe would be largely obscured by remaining trees and nearly imperceptible. (Draft EIR, pp. 9-33 to 9-37; see also Response to Comment A-1-6, IO18-41 to 43, 50 to 57, and	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
59 to 75, IO25-10 to 12, and 14, IO31-11, 22 & 23, IO41-19 & 20, 25 & 26, IO51-46, and pp. B11 and B19 of Appendix B to the Draft MVWPSP.)			
Impact 9-2: Damage to scenic resources within a Placer County-designated scenic route (LS) The MVWPSP project site is within the vicinity of two Placer County-designated scenic routes: Northstar Drive and SR 267. The West Parcel development area is not visible from Northstar Drive and would have no impact on that designated scenic route. The MVWPSP would change the land use designation adjacent to SR 267 from open space to residential, but would establish a 150-foot setback from the edge of the SR 267 right-of-way within which residential or retail commercial structures would be prohibited, with the exception for accessory structures such as bus shelter(s), the covered bridge, and entry kiosk. In addition, the MVWPSP includes Development Standards to protect scenic resources visible from SR 267, including screening requirements that would minimize visibility of project structures and protect views from SR 267 that are currently dominated by forest land and natural features. (Draft EIR, pp. 9-39 to 9-42; see also Response to Comment IO18-41 to 43, 50 to 57, and 59 to 75, IO25-10 to 12, and 14, IO31-11, 22 & 23, IO41-19 & 20, 25 & 26, and pp. B11 and B19 of Appendix B to the Draft MVWPSP .)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 9-3: Degrade the existing visual character or quality of the site and its surroundings (LS) Implementation of the MVWPSP would result in visible alteration of the West Parcel development area. The project would result in the conversion of a forested site that is dominated by native vegetation to a developed site that would be characterized by human-made features. The MVWPSP includes specific and enforceable Development Standards that would limit modifications to the existing visual environment by retaining existing rock outcroppings and other natural features, minimizing grading and alterations to existing topography, and retaining trees. The MVWPSP would also require that structures be visually	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
screened, and be designed with colors, materials, and textures that blend into the existing natural environment, which would minimize alterations to the existing visual character. The visual character of the site from surrounding areas, including distant views and nearby recreation sites, would not be noticeably altered by buildout of the MVWPSP because of topographic screening and the implementation of required Development Standards (see Impacts 9-1 and 9-2). There would be little or no impact to public gathering areas, trails, or other public vantage points within, adjacent to, or in the immediate vicinity of the project area because views of the site from publicly available trails and roads (e.g., Tahoe Rim Trail, Fibreboard Freeway) are largely blocked by topography and vegetation, and use of onsite trails is limited to logging employees and private recreation, subject to annual renewal. Further, the resulting visual character of the plan area would be consistent with other nearby development. (Draft EIR, pp. 9-43 to 9-45; see also Response to Comment A-1-6, IO18-41 to 43, 50 to 57, and 59 to 75, IO25-10 to 12, and 14, IO31-11, 22 & 23, IO41-19 & 20, 25 & 26, and pp. B11 and B19 of Appendix B to the Draft MVWPSP.)			
Impact 9-4: New sources of light and glare (LS) The MVWPSP development would result in new sources of light, including interior and exterior residential lighting, street lighting, lighting for commercial facilities and homeowner amenities, and lights from vehicle traffic. As specified in MVWPSP policies and Development Standards, these light sources would be required to implement measures to minimize light pollution. Light sources from the project would not be visible from Lake Tahoe or the Fibreboard Freeway, but they would be visible from Martis Valley. Because of the distance from likely viewpoints, screening by topography and vegetation, and requirements that limit the intensity of outdoor lighting, the new light sources visible from Martis Valley would be less prominent than existing light sources and would not modify the character of the existing nighttime views. Therefore, the project would not create a new source of	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
substantial light or glare that would adversely affect views in the area, or contribute substantially to skyglow. (Draft EIR, pp. 9-45 to 9-50; see also Response to Comment , IO18-41 to 43, 50 to 57, and 59 to 75, IO31-11, 22 & 23, IO41-19 & 20, 26, IO51-46, and p. B19 of Appendix B to the Draft MVWPSP.)			
Impact 9-5: Visual impacts during construction (LS) During construction, the visual impact of buildings, roadways, infrastructure, and other project features would be greater, because of the potential presence of construction equipment, material storage, contrasting colors, reflective materials, cleared areas, graded pads, utility trenches, and the like during construction. The construction impacts would be largely screened from public views by topography and vegetation. In addition, construction activities would be phased as the project is gradually built out over approximately 20 years, and the visual impact of constructing each phase or project component would be short-term. Construction would occur primarily during daylight hours and would not involve substantial construction lighting. (Draft EIR, p. 9-51.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 9-6: Cumulative effects on scenic vistas (LS) Future projects including the Brockway Campground Project, build-out of the Martis Camp neighborhood, implementation of the Northstar Mountain Master Plan, and construction of the Northstar Highlands Phase II development would alter scenic vistas in the project vicinity. Each of these projects would be required to comply with applicable design standards, would be reviewed for impacts to scenic vistas consistent with CEQA and TRPA requirements, as applicable, and would incorporate feasible mitigation measures for any significant impacts on scenic vistas. The exact cumulative effect of these projects on scenic vistas cannot be known with specificity. However, based on the analysis in each project's environmental review, it is possible that taken together, past, present, and future projects could result in a cumulatively	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
significant impact to scenic vistas. As described above, the MVWPSP West Parcel development area is largely screened from public viewpoints by topography and vegetation. The MVWPSP also includes required design standards that would minimize the visibility of structures, including standards related to materials and colors; preservation of trees, rocks, and natural features; landscaping and screening of development; and the placement of structures to minimize visibility. As a result, the impacts of the project on scenic vistas are less than significant. Project elements are not adjacent to the other future projects visible from Martis Valley and Northstar, and the project would affect different views than the other future projects visible from Martis Valley and Northstar. Because the viewsheds for these projects are different, and the proposed project development would be largely screened by vegetation and topography and only minimally visible within scenic vistas, the MVWPSP would not make a considerable contribution to a significant cumulative impact on scenic vistas from Martis Valley and Northstar. The West Parcel development area would be adjacent to the Brockway Campground Project, which is proposed for the land within the Lake Tahoe Basin, immediately south of the West Parcel. The Brockway Campground Project is in the preliminary planning stages, so the impacts to scenic vistas are not known. If the Brockway Campground Project did result in significant cumulative impacts to scenic vistas, the MVPSP would not make a considerable contribution to those impacts because it is not visible from the areas from which the Brockway Campground improvements might be visible, such as Fibreboard Freeway. (Draft EIR, p. 9-52; see also Response to Comment IO18-41 to 43, 50 to 57, and 59 to 75, IO25-10 to 12, and 14, IO41-19 & 20, 25 & 26, 28, and pp. B11 and B19 of Appendix B to the Draft MVWPSP.)			
Cumulative Impact 9-7: Cumulative effects on scenic resources within a Placer County-designated scenic route (LS) The Placer County-designated scenic	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
routes were designated as scenic routes specifically because past projects have not degraded scenic resources within those routes. While present or proposed future projects may be within the SR 267 viewshed, none of the projects include substantial modifications to scenic resources within Placer County-designated scenic routes. A new, 115-foot-tall monopine cellular tower is proposed by Verizon Wireless on the West Parcel, near Brockway Summit, approximately 600 feet north of Carnelian Woods Avenue and approximately 200 feet west of SR 267. As a monopine, the tower is designed to be camouflaged and blend in with the surrounding trees. From the perspective of cumulative visual impact, the cellular tower, even if detectable, would be approximately one mile from the West Parcel development area at its closest approach, and approximately 1.2 miles from the proposed project entrance along SR 267. Because of distance, topography, and vegetative screening, no elements of the project would combine with views of the cellular tower from any location on the ground. No cumulative impact would occur. Any changes to County-designated scenic routes from other future projects would be required to be mitigated through setbacks, clustering of development, screening, density limitations and/or other measures as required by the Martis Valley Community Plan. As described under Impact 9-2, after implementation of Mitigation Measure 9-2, the MVWPSP would result in less-than-significant impacts to scenic resources within designated scenic routes. (Draft EIR, pp. 9-52 to 9-53; see also Response to Comment IO18-41 to 43, 50 to 57, and 59 to 75, IO25-10 to 12, and 14, IO41-19 & 20, 25 & 26, and pp. B11 and B19 of Appendix B to the Draft MVWPSP.)			
Cumulative Impact 9-8: Cumulative effects on the visual character or quality of the site and its surroundings (LS) Future projects that could affect the visual character of the MVWPSP site and its surroundings include the Martis Valley Trail, CalPeco 625 and 650 Electrical Line Upgrade, Brockway Campground Project, buildout of the Martis Camp subdivision, implementation of the Northstar Mountain Master Plan, and	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
construction of the Northstar Highlands Phase II development. Because of their nature as outdoor recreation-oriented projects, maintenance of the existing visual character of the natural environment is an important component of Martis Valley Trail and Brockway Campground Projects. Therefore, these projects are not expected to substantially alter the visual character of the MVWPSP site and its surroundings. Based on the visual resource analysis in the Final EIS/EIR for the CalPeco 625 and 650 Electrical Line Upgrade, that project is not expected to result in a significant impact on the visual character of the MVWPSP site and its surroundings (USFS 2014). However, the Martis Camp, Northstar Mountain Master Plan, and Northstar Highlands Phase II projects combined with the existing residential and commercial development in Martis Valley will result in a significant cumulative impact to the visual character and quality of Martis Valley, as the natural landscape is gradually altered by residential and commercial development and associated infrastructure. Implementation of the MVWPSP would result in visible alteration of the West Parcel development area. The MVWPSP includes specific and enforceable Development Standards that would minimize modifications to the existing visual environment by retaining existing rock outcroppings and other natural features, minimizing grading and alterations to existing topography, and retaining trees. The MVWPSP would also require that structures be visually screened, and be designed with colors, materials, and textures that blend into the existing natural environment, which would minimize alterations to the existing visual character. The visual character of the site from surrounding areas, including distant views and nearby recreation sites, would not be noticeably altered by buildout of the MVWPSP because of topographic screening and the implementation of required Development Standards (see Impacts 9-1, 9-2, and 9-3). The change in the visual character and quality of the MVWPSP project area would be a less-than-significant impact, because there are would be no impacts to public gathering areas, trails or other			

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
public vantage points within, adjacent to, or in the immediate vicinity of the project plan area, and because use of existing trails is limited to logging employees and private recreation, which is not a permanent use, because it is subject to annual renewal. (Draft EIR, p. 9-53; see also Response to Comment IO18-41 to 43, 50 to 57, and 59 to 75, IO25-10 to 12, and 14, IO41-19 & 20, 25 & 26, 28, and pp. B11 and B19 of Appendix B to the Draft MVWPSP.)			
Cumulative Impact 9-9: Cumulative effects on light and glare (S) Future projects including the Brockway Campground Project could result in new sources of light and glare from outdoor lighting, campfires, and vehicle headlights that might be visible from nearby recreation areas or the Lake Tahoe. As shown in Impact 9-4, light sources and glare from the project area would not be visible from the Lake Tahoe Basin, or nearby recreation areas such as the Fibreboard Freeway. While future projects could result in new sources of light and glare visible from nearby recreation areas or the Lake Tahoe Basin, the MVWPSP would not substantially contribute to these effects. Therefore, the MVWPSP would not result in a considerable contribution to cumulative impacts from light and glare visible from nearby recreation areas or the Lake Tahoe Basin. Past and present projects in the Martis Valley have created substantial sources of light that have adversely affected nighttime views in Martis Valley. These sources of light would likely increase as a result of future projects including buildout of the Martis Camp neighborhood, implementation of the Northstar Mountain Master Plan, construction of the Northstar Highlands Phase II development, and other residential development within the Martis Valley. As shown in Exhibit 9-34, above, the existing nighttime views in Martis Valley are heavily influenced by lighting from residential neighborhoods and commercial and resort development. As described in Impact 9-4, light from the project would be less prominent than existing light sources and would not, by itself, result in a significant impact. However, while it is unlikely that all buildings would be	No additional feasible mitigation is possible.	SU	**Finding:** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. However, the Board of Supervisors finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the Project's cumulative impacts to light and glare, as more fully stated in the Statement of Overriding Considerations. **Explanation/Facts in Support of Finding:** While it is unlikely that all buildings will be illuminated at once, the Project would result in new light sources that would be clearly visible from Martis Valley and would introduce new light sources in a portion of the view that is not already affected by light, which would contribute to the existing adverse effects on nighttime views. Thus, the Project would result in a considerable contribution to a cumulatively significant impact on nighttime views. The Development Standards incorporated into the Project will substantially lessen these cumulative impacts. The Development Standards would limit light sources to the minimum amount necessary to maintain nighttime safety, utility, security and productivity. Thus, no additional mitigation is feasible and the impact is considered significant and unavoidable. (Draft EIR, pp. 9-53 to 9-55; Final EIR, p. 2-14; see also Response to Comment IO18-41 to 43, 50 to 57, and 59 to 75, IO41-19 & 20, 26, and p. B19 of Appendix B to the Draft MVWPSP.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
simultaneously illuminated, the project would result in new light sources throughout approximately 662 acres that have no existing light sources. These new light sources from buildout of the MVWPSP would be clearly visible from Martis Valley and would introduce new light sources in a portion of the view that is not already affected by light, which would contribute to the existing adverse effects on nighttime views. Thus, the MVWPSP would result in a considerable contribution to a cumulatively significant impact on nighttime views. The MVWPSP includes Development Standards that require lighting practices and systems that will minimize light pollution, glare, and light trespass, and that conserve energy while maintaining nighttime safety, utility, security and productivity. In addition, the Development Standards include provisions to limit daytime glare by prohibiting reflective materials, requiring roof overhangs to shade large areas of glass, and requiring building orientation and landscaping to screen views of development from surrounding areas. As described above, the standards are enforceable through the design review and permitting process. As such, all lighting standards that address the design of lighting systems would be enforced through the issuance of a permit. In addition, the Development Standards require that the exterior lighting standards be incorporated into the homeowners association (HOA) Covenants, Conditions, and Restrictions (CC&Rs). Incorporating the standards into the CC&Rs would allow the HOA to enforce standards related to the timing and operation of exterior lighting on an ongoing basis. This analysis does not rely upon the enforcement of the CC&Rs by the HOA, but implementation of the CC&Rs would provide additional benefits to the extent they are implemented and enforced. The Development Standards require the following measures that would reduce light pollution: • Interior lighting shall be designed to minimize light from spilling outdoors. • Exterior lighting shall use the lowest possible wattage and energy efficient luminaire for			

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
each application; Minimize light use during non-active hours (11PM – dawn), except as needed for safety. • Exterior lighting shall only illuminate the area needed for safety. • Outdoor light fixtures for streets, commercial and residential buildings, pedestrian areas, and roadways shall be shielded, and/or directed down to preserve the night sky and away from residential areas to minimize light and glare effects on adjacent residences. • Exterior lighting fixtures shall be installed and shielded in such a manner that no light rays are emitted from the fixture at angles above the horizontal plane. • Timers, motion-sensors, or equivalent devices on both residential and commercial buildings, shall be implemented on exterior lighting fixtures at night near buildings, where applicable, to avoid continual lighting of surfaces. • Yellow spectrum light sources, such as low-pressure sodium lamps and narrow-spectrum amber LEDs, shall be used for the majority of outdoor lighting. Other spectrum lighting may be used where necessary for a particular purpose, such as safety. Because the MVWPSP already includes requirements that would limit light sources to the minimum amount necessary to maintain nighttime safety, utility, security and productivity; no additional mitigation is feasible. (Draft EIR, pp. 9-53 to 9-55; Final EIR, p. 2-14; see also Response to Comment, IO18-41 to 43, 50 to 57, and 59 to 75, IO41-19 & 20, 26, and p. B19 of Appendix B to the Draft MVWPSP.)			
Cumulative Impact 9-10: Cumulative effects on visual resources during construction (LS) Other reasonably foreseeable projects in the project vicinity would likely be constructed during the approximately 20 year construction period for the MVWPSP. These other projects could include the Brockway Campground Project, CalPeco 625 and 650 Electrical Line Upgrade Project, buildout of the Martis Camp neighborhood, the Martis Valley Trail, implementation of the Northstar Mountain	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
Master Plan, Northstar at Tahoe Ski Trail Widening, and Caltrans Highway Improvement projects along SR 267. However, because of the approximately 20-year phased construction schedule for the MVWPSP, the amount of construction activity that would coincide with other nearby construction periods would be limited. (Draft EIR, p. 9-55.)			
TRANSPORTATION, PARKING AND CIRCULATION			
Impact 10-1: Impacts to intersection operations (S) The proposed project would worsen already unacceptable operations (i.e., already beyond the acceptable threshold) at the SR 267/I-80 WB Ramps, SR 267/Schaffer Mill Road/Truckee Airport Road and SR 267/Highlands View Road intersections during the winter peak hour. (Draft EIR, pp. 10-27 to 10-28; see also Master Response 5, Response to Comment IO6-2 to 5, IO18-10, 14, 20 to 23, and 26, IO31-25, 32 and 33, IO41-31 to 36, 39, 43, and 44.)	**Mitigation Measure 10-1a: Optimize signal timing at the SR 267/I-80 WB ramps intersection** Prior to the Improvement Plan approval for the initial phase, the project applicant shall coordinate with Caltrans to optimize the traffic signal operation at the SR 267/I-80 WB Ramps intersection. Evidence shall be provided to the satisfaction of the Placer County Engineering and Surveying Division and Placer County Department of Public Works that the optimization will be implemented by Caltrans as warranted, or that a good faith effort has been made by the applicant to coordinate with Caltrans. **Mitigation Measure 10-1b: Optimize signal timing at the SR 267/Schaffer Mill Road/Truckee Airport Road intersection** Prior to the Improvement Plan approval for the initial phase, the applicant shall coordinate with Caltrans to optimize the traffic signal operation at the SR 267/Schaffer Mill Road/Truckee Airport Road intersection. Evidence shall be provided to the satisfaction of the Placer County Engineering and Surveying Division and Placer County Department of Public Works that the optimization will be implemented by Caltrans as warranted, or that a good faith effort has been made by the applicant to coordinate with Caltrans. **Mitigation Measure 10-1c: Provide signage on Highlands View Road for motorists to access SR 267 NB via Ridgeline Drive and Northstar Drive** The Improvement Plans for the first development of residential units of the MVWPSP shall show the construction and installation of a message sign on Highlands View Road. The sign shall be	SU	**Finding:** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. However, the Board of Supervisors finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the Project's impacts to intersection operations, as more fully stated in the Statement of Overriding Considerations. **Explanation/Facts in Support of Finding:** The Level of Service ("LOS") at three of the intersections on SR 267 between the Town of Truckee/Placer County Line and SR 28 were already unacceptable and would worsen during the Winter peak hour as a result of the Project. Specifically, the LOS would deteriorate from LOS E to F at the SR 267/I-80 WB intersection, the SR 267/Schaffer Mill Road/Truckee Airport Road intersection, and the SR 267/Highlands View Drive intersection. The Project has incorporated Mitigation measures 10-1a, 10-1b, and 10-1c that will lessen these impacts. Specifically, 10-1a and 10-1b require the project applicant to coordinate with Caltrans to optimize the signal light timing at the SR 267/I-80, and SR 267/Schaffer Mill Road/Truckee Airport Road intersections. 10-1c requires the project applicant to provide signage on Highlands View Drive notifying motorists that access to SR 267 northbound is via Ridgeline Drive and Northstar Drive. These mitigation measures will reduce the impacts at the SR 267/Highlands View Drive intersection to a less than significant level, but Placer County cannot guarantee that Caltrans will optimize the signal light timing and therefore the impacts at the SR 267/I-80 WB and SR 267/Schaffer Mill Road/Truckee Airport Road intersections are significant and unavoidable. (Draft EIR, pp. 10-27 to 10-29; see also Master Response 5, Response to Comment IO6-2 to 5, IO18-10, 14, 20-23, and 26, IO31-25, 32 and 33, IO41-31 to 36, 39, 43, and 44.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	located at a sufficient distance from the Ridgeline Drive intersection to alert motorists that access to northbound SR 267 is via Ridgeline Drive (left from Highlands View Road) and Northstar Drive (right from Ridgeline Drive), so as to access the traffic signal at the SR 267/Northstar Drive intersection. The message sign and its use during the winter peak traffic conditions shall be required in perpetuity. (Draft EIR, pp. 10-28 to 10-29.)		
Impact 10-2: Impacts to roadway segments (S) The proposed project would worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28, resulting in a segment either degrading from acceptable LOS D to unacceptable LOS E, or exacerbating conditions on a segment operating at an unacceptable LOS E by an increase in V/C ratio of 0.05 or more, for both the summer and winter peak hours. (Draft EIR, pp. 10-29 to 10-30; see also Master Response 5, Response to Comment SA3-1, IO6-2 to 4, IO18-10, 14, 20 to 23, and 26, IO31-25, 27, 32 and 33, IO32-2, IO41-31 to 36, and 39.)	**Mitigation Measure 10-2: Pay impact fee to Placer County for future roadway improvements to State Route 267** Prior to issuance of any building permits for each commercial or residential lot, the project shall be subject to the payment of traffic impact fees in effect for the Tahoe District, pursuant to applicable ordinances and resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required and shall be paid to the Placer County Department of Public Works: • Countywide Traffic Limitation Zone: Article 15.28.010, Placer County Code The current total combined estimated fee for the entire project is $3,685,511.42 ($4,846 per single family residential unit). The fees were calculated using the information supplied. If the use or the square footage changes, then the fees will change. The actual fees paid shall be those in effect at the time the payment occurs. (Draft EIR, pp. 10-31 to 10-32.)	SU	**Finding:** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. However, the Board of Supervisors finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the Project's impacts to roadway segments, as more fully stated in the Statement of Overriding Considerations. **Explanation/Facts in Support of Finding:** The Project would worsen traffic congestion on the five segments of SR 267 between the Town of Truckee/Placer County Line and SR 28. Specifically, the LOS between the Placer County Line and Schaffer Mill Road would degrade from LOS D to E during the Summer peak hour and the existing LOS E would worsen during the Winter peak hour. The LOS between Schaffer Mill Road and Northstar Drive would degrade from LOS D to E during the Summer peak hour and the existing LOS E would worsen during the Winter peak hour. The existing LOS E between Northstar Drive and Highlands View Drive would worsen during both the Winter and Summer peak hours. The existing LOS E between Highlands View Drive and the Project Access Roadway would worsen during both the Winter and Summer peak hours. Lastly, the existing LOS E from the Project Access Roadway to SR 28 would worsen during bot the Winter and Summer peak hours. The project has incorporated mitigation measure 10-2, which will lessen these impacts. Specifically, the Project shall be subject to payment of traffic impact fees to Placer County for future improvements to SR 267. The fees paid by the Project will not cover the costs of making the improvements necessary on SR 267 to reduce the impacts to less-than-significant levels. However, the project will pay its "fair share" of those costs. Nevertheless, these impacts are considered significant and unavoidable. (Draft EIR, pp. 10-29 to 10-32; see also Master Response 5, Response to Comment SA3-1, IO6-2 to 4, IO18-10, 14, 20 to 23, and 26, IO31-25, 27, 32 and 33, IO41-31 to 36, and 39.)
Impact 10-3: Impacts to freeway facilities (LS) The addition of project-generated traffic to	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
existing freeway on- and off-ramps at the SR 267/I-80 interchange would not degrade operations to unacceptable levels during the summer and winter peak hours. (Draft EIR, p. 10-32; see also Master Response 5, Response to Comment IO6-1 to 4, IO18-10, 14, 20 to 23, and 26, IO31-25, 32 and 33, IO41-43 and 44.)			
Impact 10-4: Impacts to bicycle and pedestrian facilities The proposed project would not disrupt or interfere with existing or planned bicycle/pedestrian facilities, nor would it result in unsafe conditions for bicyclists or pedestrians. Further, the project would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. (Draft EIR, p. 10-32; see also Response to Comment IO3-2, IO31-29.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 10-5: Impacts to transit (LS) The proposed project would enhance existing transit service on SR 267 with construction of a new bus shelter within the MVWPSP near SR 267. The added transit would not create demand above the current capacity. (Draft EIR, p. 10-33; Final EIR, pp. 2-14 to 2-15; see also, Response to Comment IO18-27, IO31-26, IO41-45 and 46, IO47-2.)	**Mitigation Measure 10-5a: Payment of annual transit fees** Prior to recordation of the initial Large Lot or Small Lot Final Map, the applicant shall establish a new Zone of Benefit (ZOB) within an existing County Service Area (CSA) or annex into a pre-existing ZOB to provide adequate funding of capital and ongoing operational transit services/requirements. The applicant shall submit to the County for review and approval a complete and adequate engineer's report supporting the level of assessments necessary for the establishment of the ZOB. The report shall be prepared by a registered engineer in consultation with a qualified financial consultant and shall establish the basis for the special benefit appurtenant to the project. **Mitigation Measure 10-5b: Join and maintain membership in the Truckee-North Tahoe Transportation Management Association** Prior to Improvement Plan approval and/or recordation of the Final Map, the commercial and homeowner associations shall join and maintain membership (at a rate based on the engineering report, per Mitigation Measure 10-5a) in perpetuity in the Truckee-North Tahoe Transportation Management Association	LS	Although not required to reduce a significant impact, Mitigation measures 10-5a (Payment of Annual Transit Fees) and 10-5b (Join and Maintain Membership in the TNT/TMA) would determine with specificity the project's fair-share annual contribution to ongoing operational transit services and improvements, and would require ongoing participation by the project's commercial and homeowner associations in TNT/TMA to address and improve transit and transportation conditions into the future. Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	(TNT/TMA), whose established purpose is to improve the general traffic and transportation conditions in the Truckee/North Tahoe area, and to address situations associated with traffic congestion and transportation systems. (Draft EIR, p. 10-33; Final EIR, pp. 2-14 to 2-15; see also, Response to Comment IO18-27, IO41-47 and 48, IO47-2.)		
Impact 10-6: Construction-related impacts (S) Project construction would generate employee and truck trips, which would use segments of SR 267. These activities could cause lane closures, damage to roadways, and increased congestion. (Draft EIR, pp. 10-34 to 10-35; see also Response to Comment IO41-51.)	**Mitigation Measure 10-6: Develop and implement a construction traffic management plan** Prior to Improvement Plan approval, the project applicant shall develop and submit for review and approval a construction traffic management plan (TMP) to the satisfaction of the Placer County Department of Public Works and Caltrans. The plan shall include (but not be limited to) items such as: • guidance on the number and size of trucks per day entering and leaving the West Parcel development area; • identification of arrival/departure times that would minimize traffic impacts; • locations of staging areas; • locations of employee parking and methods to encourage carpooling and use of alternative transportation; • criteria for use of flaggers and other traffic controls; • preservation of safe and convenient passage for bicyclists and pedestrians through/around construction areas; • monitoring for roadbed damage and timing for completing repairs; • limitations on construction activity during peak/holiday weekends and special events; • preservation of emergency vehicle access; • removing traffic obstructions during emergency evacuation events; and • providing a point of contact for Martis Valley residents and guests to obtain construction information, have questions answered, and convey complaints.	LS	**Finding:** Compliance with Mitigation Measure 10-6, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring the project applicant to develop and submit a traffic management plan. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project construction activities would generate employee and truck trips along SR 267. These activities could also cause lane closures, damage to roadways, and increased congestion. Mitigation measure 10-6 would require the project applicant to develop a traffic management plan to the satisfaction of Placer County and Caltrans. The plan will provide information to help minimize traffic congestion, damage to roadways, and limit traffic impacting construction activities during peak/holiday weekends and special events. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 10-34 to 10-36; see also Response to Comment IO41-51.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	(Draft EIR, pp. 10-35 to 10-36.)		
Impact 10-7: Safety-related impacts (LS) The Project Access Roadway would intersect SR 267 within the chain-controlled segment of the highway. There would be times during winter storms when chain-controls would be in effect on SR 267 and some vehicles leaving the project and entering SR 267 would need to have a safe location to install chains on their vehicles. Because the project would include parking spaces or turnouts outside of the Caltrans right-of-way for the installation of chains before cars exit the project site, and would provide through signage and/or other means (e.g., electronic media) advanced notice of chain-control requirements, the project would not result in an adverse hazard or safety-related impact relative to project design features. (Draft EIR, p. 10-36; see also Response to Comment IO30-1, IO41-50.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 10-8: Cumulative impacts to intersection operations (S) The proposed project would worsen operations to unacceptable levels or exacerbate already unacceptable operations at the intersections described below. • SR 267/I-80 WB Ramps – operations would worsen as follows: o Summer peak hour: LOS D to E (14 second increase in delay) o Winter peak hour: LOS F operations exacerbated (19 second increase in delay) • SR 267/I-80 EB Ramps – operations would worsen as follows: o Winter peak hour: LOS F operations exacerbated (10 second increase in delay) • SR 267/Brockway Road/Soaring Way – operations would worsen as follows: o Summer peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) o Winter peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) • SR 267/Schaffer Mill Road/Truckee Airport	**Cumulative Mitigation Measure 10-8a: Pay Placer County fee for future roadway improvements, including the SR 267/I-80 WB Ramps intersection** Implement Mitigation Measure 10-2. The Town of Truckee TIF Program identifies the construction of a two-lane roundabout at this location. This improvement would reduce the traffic impact to a less-than-significant level during both the summer and winter peak hour under cumulative-plus-project conditions. **Cumulative Mitigation Measure 10-8b: Pay Placer County fee for future roadway improvements, including the SR 267/I-80 EB Ramps intersection** Implement Mitigation Measure 10-2. The Truckee TIF Program identifies the construction of a two-lane roundabout at this location. This improvement would reduce the traffic impact to a less-than-significant level during the winter peak hour under cumulative-plus-project conditions. **Cumulative Mitigation Measure 10-8c: Pay Placer County fee for future roadway improvements, including the SR 267/Brockway Road/Soaring Way intersection**	SU	**Finding:** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. However, the Board of Supervisors finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the Project's cumulative impacts to intersection operations, as more fully stated in the Statement of Overriding Considerations. **Explanation/Facts in Support of Finding:** The Project would worsen operations to unacceptable levels or exacerbate already unacceptable operations at six of the intersections on SR 267 between the Town of Truckee/Placer County Line and SR 28. During the Winter peak hour, the current LOS F would be exacerbated at all five existing intersections and LOS F is expected at the SR 267/Project Access Roadway intersection. During the Summer peak hour, the current LOS F would be exacerbated at the SR 267/Broackway Road/Soaring Way, SR 267/Schaffer Mill Road/Truckee Airport Road, and SR 267/Highlands View Drive intersections, and LOS F is expected at the SR 267/Project Access Roadway intersection. Operations at the SR 267/I-80 WB intersection would degrade from LOS D to E during the Summer peak hour. To lessen these effects, the Project is required to implement Cumulative Mitigation Measures 10-8a through 10-8f. Specifically, the Project will provide signage on Highlands View Drive directing motorists to access SR 267 northbound via Ridgeline Drive and Northstar Drive, and shall be subject to payment of traffic impact fees to Placer County for future improvements to SR 267. The fees paid by the Project will

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
Road – operations would worsen as follows: o Summer peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) o Winter peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) • SR 267/Highlands View Road – operation would worsen as follows: o Summer peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) o Winter peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) • SR 267/Project Access Roadway – operation would exceed LOS threshold: o Summer peak hour: LOS F operations o Winter peak hour: LOS F operations Six of the study intersections would operate at unacceptable LOS F under cumulative conditions with the proposed project, either degrading from an acceptable level of service or substantially exacerbating already unacceptable operations. (Draft EIR, pp 10-39 to 10-41; see also Master Response 5, Response to Comment SA3-1, IO6-2 to 4, and 8, IO18-23 and 33, IO31-25, 27, 32, and 33, IO41-31 to 37, 39, 43 & 44, and 52.)	Implement Mitigation Measure 10-2. The Truckee TIF Program identifies the construction of a roundabout or equivalent improvements at this intersection. The TIF Program also includes the widening of SR 267 on both sides of this intersection, which would essentially result in a two-lane roundabout at this intersection. This improvement would reduce the traffic impact to a less-than-significant level during the summer and winter peak hour under cumulative-plus-project conditions. **Cumulative Mitigation Measure 10-8d: Pay Placer County fee for future roadway improvements, including the SR 267/Schaffer Mill Road/Truckee Airport Road intersection** Implement Mitigation Measure 10-2. The Placer County CIP identifies improvements to this intersection as well as the widening of SR 267 to four lanes on both sides of this intersection. The widening of this intersection with either signalization or the construction of a two-lane roundabout would reduce the traffic impact to a less-than-significant level during the summer and winter peak hours under cumulative-plus-project conditions. **Cumulative Mitigation Measure 10-8e: Provide signage on Highlands View Road and pay Placer County fee for future roadway improvements** Implement Mitigation Measures 10-1c and 10-2. The Placer County CIP includes the widening of SR 267 to four lanes on both sides of this intersection. The widening of this intersection, along with the project-specific mitigation of providing signage on Highlands View Road for motorists to access SR 267 northbound via Ridgeline Drive and Northstar Drive, would reduce the impact to a less-than-significant level during the summer and winter peak hours under cumulative-plus-project conditions. **Cumulative Mitigation Measure 10-8f: Pay Placer County fee for future roadway improvements, including the SR 267/Project Access Road intersection** Implement Mitigation Measure 10-2. The Placer County CIP includes the widening of SR 267 to		not cover the costs of making the improvements necessary on SR 267 to reduce the impacts to less-than-significant levels. However, the project will pay its "fair share" of those costs. In addition, neither the TIF nor the Placer County CIP include widening SR 267 south of Brockway Summit, so SR 267 would remain a two lane road at the Project Access Roadway intersection. Therefore, these impacts are considered significant and unavoidable. (Draft EIR, pp. 10-39 to 10-43; see also Master Response 5, Response to Comment SA3-1, IO6-2 to 4, and 8, IO18-23 and 33, IO31-25, 27, 32, and 33, IO41-31 to 37, 39, 43 & 44, and 52.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	four lanes on both sides of this intersection. Although the widening of this intersection plus the installation of a traffic signal or two-lane roundabout would result in acceptable levels of service, Caltrans would not support either signalization or a roundabout because of the steep grade of SR 267 (over 4 percent) at this location and the resulting potential of rear-end collisions, especially in snowy conditions (Brake, pers. comm., 2015). Therefore, LOS F conditions would remain at this intersection during both the summer and winter peak hours. (Draft EIR, pp 10-41 to 10-43.)		
Cumulative Impact 10-9: Cumulative impacts to roadway segments (S) The proposed project would exacerbate already unacceptable operations, as described below. Although widening of SR 267 from two to four lanes from Brockway Road to the Town of Truckee/Placer County line is included in the Town of Truckee TIF Program, and from the County line to Brockway Summit in the Placer County CIP, SR 267 was assumed to remain two lanes under cumulative conditions for reasons described in Section 10.3.5 of the Final EIR. As a two-lane highway, SR 267 would operate at unacceptable levels of service on five of the seven study segments during the summer peak hour without the proposed project, and all seven segments would operate at unacceptable levels of service during the winter peak hour without the proposed project. For the two SR 267 segments located in the Town of Truckee, the project would result in a significant impact on the segment from Brockway Road to the Town of Truckee/Placer County line during the winter peak, as the project would increase the V/C ratio by 0.05 (an increase by 0.05 or more is considered significant). For the five SR 267 roadway segments located in Placer County, the project would result in a significant impact at all five segments during both the summer and winter peak hours, in all cases because it would result in an increase in V/C ratio of 0.05 or greater than segments projected to operate unacceptably without the	**Cumulative Mitigation Measure 10-9: Pay Placer County fee for future roadway improvements** Implement Mitigation Measure 10-2. The widening of SR 267 to four lanes from Brockway Road to Brockway Summit would result in LOS D or better traffic operations on the study segments from Brockway Road to the Project Access Roadway during the summer and winter peak hours. As previously discussed, the widening of SR 267 to four lanes from Brockway Road to Brockway Summit is identified in both the Town of Truckee TIF Program and the Placer County CIP. The project would pay traffic impact fees that could be used for those portions of SR 267 located within Placer County. The Placer County CIP does not include widening of SR 267 from Brockway Summit to SR 28; therefore, there would be no feasible mitigation for the significant impact of the project on the roadway segment from the Project Access Roadway to SR 28. (Draft EIR, p. 10-43.)	SU	**Finding:** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. However, the Board of Supervisors finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the Project's cumulative impacts to roadway segments, as more fully stated in the Statement of Overriding Considerations. **Explanation/Facts in Support of Finding:** The Project would worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28, resulting in a segment either degrading from acceptable LOS D to unacceptable LOS E, or exacerbating conditions on a segment operating at an unacceptable LOS E by an increase in V/C ratio of 0.05 or more, for both the summer and winter peak hours. To lessen these impacts the Project is required to implement Cumulative Mitigation Measure 10-9. Specifically, the Project shall be subject to payment of traffic impact fees ("TIF") to Placer County for future improvements to SR 267. The fees paid by the Project will not cover the costs of making the improvements necessary on SR 267 to reduce the impacts to less-than-significant levels. However, the project will pay its "fair share" of those costs. In addition, neither the TIF nor the Placer County CIP include widening SR 267 south of Brockway Summit, so SR 267 would remain a two lane road at the Project Access Roadway intersection. Therefore, these impacts are considered significant and unavoidable. (Draft EIR, pp. 10-37, 10-43 to 10-44; see also Master Response 5, Response to Comment SA3-1, IO6-2 to 4, IO18-23 and 33, IO31-25, 27, 32 and 33, IO41-31 to 37, 39, 43 & 44, and 52.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
project. (Draft EIR, pp. 10-37, 10-43 to 10-44; see also Master Response 5, Response to Comment SA3-1, IO6-2 to 4, IO18-23 and 33, IO31-25, 27, 32 and 33, IO32-2, IO41-31 to 37, 39, 43 & 44, and 52.)			
Cumulative Impact 10-10: Cumulative impacts to freeway facilities (LS) The freeway facilities analyzed in the EIR are expected to operate at acceptable levels of service under cumulative conditions. The addition of project generated traffic to the cumulative no project conditions freeway on- and off-ramps at the SR 267/I-80 interchange would not degrade operations to unacceptable levels during the summer and winter peak hours. (Draft EIR, p. 10-45; see also Master Response 5, Response to Comment IO6-1, IO18-23 and 33, IO31-25, 32 and 33, IO41-31 to 36, 39, 43 & 44, and 52.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 10-11: Cumulative impacts to bicycle and pedestrian facilities (LS) As noted under Existing Plus Project Impact 10-4, the proposed project would include pavement width for a Class II bike lane through the intersection of the project access and SR 267, as well as new multi-purpose trails to provide connections between MVWPSP neighborhoods and commercial and recreational amenities. Approximately 14 miles of trails are proposed within the West Parcel, which would connect to existing and planned trails that would be constructed under cumulative conditions, including the Martis Valley Trail, the Tompkins Memorial Trail, and the Tahoe Rim Trail, providing access for residents and guests to the broader regional trails network. Class II bike lanes through the intersection of the project access and SR 267 would connect with the planned class II bike lanes on SR 267 from Truckee to Kings Beach identified in the Placer County Regional Bikeway Plan. Future projects are not expected to disrupt the construction of planned bicycle and pedestrian facilities, and this would be a less-than-significant cumulative impact. The proposed project would not disrupt or interfere with the implementation of planned	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
bicycle/pedestrian facilities as noted in the Placer County Regional Bikeway Plan, nor would it result in unsafe conditions for bicyclists or pedestrians. Further, the project would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. (Draft EIR, p. 10-45; see also Response to Comment IO31-29.)			
Cumulative Impact 10-12: Cumulative impacts to transit (LS) As noted in the Existing Plus Project Impact 10-5, the proposed project would enhance transit with the construction of a bus shelter onsite near SR 267. Because the project would result in only one additional stop, any increase in the travel time of the transit route would be modest. Future transit ridership capacity would be dictated by the peak transit demand occurring in the winter season on the TART SR 267 route between Truckee and Crystal Bay. Any additional transit demand generated by the project could add to the cumulative need for additional winter peak-hour transit capacity. Implementation of Mitigation Measure 10-5a (Payment of Annual Transit Fees) and Mitigation Measure 10-5b (Join and Maintain Membership in the TNT/TMA) would contribute to the increase in transit service to meet future transit demand. (Draft EIR, pp. 10-45 to 10-46.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 10-13: Cumulative safety-related impacts (LS) As noted in the Existing Plus Project Impact 10-7, the proposed project would provide advanced notice of chain requirements, and space outside of Caltrans right-of-way and the main project access road easement for the installation of chains before cars exit the project site. Future nearby projects could result in additional cars entering and exiting SR 267 during chain-controlled conditions. Cars would be required to be equipped with chains or automatic traction devices, as described under Impact 10-7, on any portion of a highway that is signed for such a requirement. Residents and visitors residing and visiting chain-controlled areas during the winter would be expected to comply with existing laws and regulations and	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
could be cited by the California Highway Patrol if they are not in compliance with the California Vehicle Code and Caltrans chain-control direction. Therefore, the cumulative impact would be less than significant. The project would not result in a substantial increase in hazards due to design features or incompatible users under cumulative conditions. (Draft EIR, p. 10-46.)			
AIR QUALITY			
Impact 11-1: Short-term, construction-generated emissions of ROG, NOX, PM10, and PM2.5 (S) Short-term, construction-generated emissions would not exceed PCAPCD's threshold for ROG or PM10; however, NOX emissions would exceed PCAPCD's significance threshold during Phase 0 in 2017 and the overlap between construction phases in 2018. Thus, short-term construction emissions of criteria air pollutants and precursors could violate or contribute substantially to an existing or projected air quality violation, expose sensitive receptors to substantial pollutant concentrations, and/or conflict with air quality planning efforts. (Draft EIR, pp. 11-13 to 11-16.)	**Mitigation Measure 11-1a: Reduce short-term construction-related NOX emissions** The project applicant shall comply with the following measures onsite during construction activities to reduce emissions of NOX: • The prime construction contractor shall submit to PCAPCD a comprehensive inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower of greater) that would be used for 40 or more hours, in aggregate, during a construction season. If any new equipment is added after submission of the inventory, the prime contractor shall contact PCAPCD before the new equipment is used. At least three business days before the use of subject heavy-duty off-road equipment, the project representative shall provide PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and onsite foreman. • Before approval of Grading or Improvement Plans, whichever occurs first, the applicant shall submit for PCAPCD approval, a written calculation demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average 20 percent reduction in NOX emissions as compared to ARB statewide fleet average emissions. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The calculation	LS	**Finding:** Compliance with Mitigation Measures 11-1a, 11-1b, and 11-1c, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring PCAPCD Best Management Practices (BMPs) to reduce pollutant emissions during construction below applicable standards. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2013.2 computer program. Modeling found that NOX emissions would exceed the PCAPCD's significance threshold during Phase 0 in 2017 and the overlap between construction phases in 2018. Mitigation Measures 11-1a, 11-1b, and 11-1c would reduce this impact to a less than significant level. Specifically, 11-1a would require the Project to achieve project wide fleet-average 20 percent reduction in NOX emissions compared to ARB statewide fleet average emissions, limit idling of diesel powered equipment to a maximum of 5 minutes, and use existing power sources or clear fuel to the extent feasible. 11-1b would require the project applicant to participate in PCAPCD's Land Use Air Quality Mitigation Fund. Finally, 11-1c requires the applicant to submit a Construction Emission/Dust Control Plan to the PCAPCD for approval prior to breaking ground. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 11-13 to 11-18; Final EIR, p. 2-15; see also Response to Comment LA5-1.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	shall be provided using PCAPCD's Construction Mitigation Calculator. • During construction the contractor shall use existing power sources (e.g., power poles) or clean fuel (e.g., gasoline, biodiesel, natural gas) generators rather than temporary diesel power generators to the extent feasible. • During construction, the contractor shall minimize idling time to a maximum of 5 minutes for all diesel powered equipment. • Signs shall be posted in the designated queuing areas of the construction site to remind off-road equipment operators that idling is limited to a maximum of 5 minutes. **Mitigation Measure 11-1b: Participate in PCAPCD's Land Use Air Quality Mitigation Fund** • The applicant shall participate in PCAPCD's offsite mitigation program, the Land Use Air Quality Mitigation Fund, by paying the equivalent amount of fees for the project's contribution of NOX that exceeds the 82 lbs/day threshold, or the equivalent as approved by PCAPCD. The applicable fee rates of the program change over time. The actual amount to be paid shall be determined, and satisfied per current guidelines, at the time of approval of the Grading or Improvement Plans. **Mitigation Measure 11-1c: Submit Construction Emission/Dust Control Plan to PCAPCD** Prior to approval of grading or improvement plans for subsequent phases of the MVWPSP, on project sites greater than one acre, the applicant shall submit a Construction Emission/Dust Control Plan to the Placer County Air Pollution Control District. Construction contractors shall not break ground prior to receiving District approval of the Construction Emission/Dust Control Plan, and delivering that approval to the County. (Draft EIR, pp. 11-16 to 11-18; Final EIR, p. 2-15; see also Response to Comment LA5-1.)		
Impact 11-2: Long-term, operation-related (regional) emissions of criteria air pollutants and precursors	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
(LS) Operation of the MVWPSP under full buildout would not exceed the PCAPCD significance threshold for ROG, NOX, or PM10. Thus, long-term operational emissions of criteria air pollutants and precursors would not violate or contribute substantially to an existing or projected air quality violation, expose sensitive receptors to substantial pollutant concentrations, and/or conflict with air quality planning efforts. (Draft EIR, pp. 11-18 to 11-19.)			
Impact 11-3: Mobile-source CO concentrations (LS) Though buildout of the MVWPSP would result in additional vehicle trips on the surrounding roadway network, project operation would not result in increases in traffic such that quantitative screening criteria for local CO emissions would be triggered. Therefore, the project would not result in increased concentrations of CO that would expose sensitive receptors to unhealthy levels. (Draft EIR, pp. 11-20 to 11-21.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 11-4: Exposure of sensitive receptors to TACs (LS) Construction-related activities would result in short-term project-generated emissions of diesel PM, but even during the most intense construction year, construction activities would not generate large amounts of exhaust emissions of PM2.5 and would not result in substantial emissions of diesel PM. Furthermore, onsite receptors, which include people that would be living on site during construction, would not be affected because construction activities that would occur every construction season during the buildout period would not take place in the same locations and would occur over short construction seasons. The closest offsite receptors are over a mile away and would not be exposed to substantial concentrations of diesel PM from the project. TACs associated with long-term operations of the MVWPSP would also be minimal and limited because of the small amount of commercial uses proposed that would generate diesel PM. Therefore, levels of TACs from project-related construction and operations	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
would not result in health risk exposures at offsite and onsite sensitive receptors. (Draft EIR, pp. 11-21 to 11-23.)			
Impact 11-5: Exposure of sensitive receptors to odors (LS) The project would introduce new odor sources into the area through diesel exhaust emissions from delivery trucks and snow removal equipment. However, these types of odor sources would be limited and infrequent because of the small scale and types of commercial uses proposed. Also, the MVWPSP would not locate land uses in close proximity to any existing odor sources. The sewer lift station, if built, would be placed underground or enclosed to control odors. (Draft EIR, pp. 11-23 to 11-24.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 11-6: Cumulative emissions of ozone precursors (CS) The nonattainment designation of Placer County with respect to ozone is the result of the emissions of ozone precursors, ROG and NOX, generated by cumulative development projects in the region, as well as from transport of these same pollutants from outside the region. When all sources of ROG and NOX throughout the region are combined they can result in a severe ozone problem, as expressed by the nonattainment status with respect to the CAAQS and/or NAAQS for ozone, which is considered to be a significant cumulative impact. As described in Impact 11-1, NOX emissions during project construction would exceed PCAPCD's significance threshold for project-specific impacts. With implementation of Mitigation Measures 11-1a and 11-1b NOX emissions would be reduced, and construction of the project would not generate emissions of ozone precursors that exceed PCAPCD's mass emission thresholds for project-specific impacts. Mitigation Measure 11-1a includes a menu of actions that, in combination, would reduce the project's net emissions of NOX during construction by 20 percent. Because mitigated emissions would still exceed the PCAPCD NOX threshold during the first two phases of construction, the applicant would be required to	**Mitigation Measure 11-6: Reduce long-term operation-related ROG and NOX emissions** Participate in the PCAPCD Offsite Mitigation Program by paying fees based on the project's contribution of pollutants (ROG and NOX), as follows: • The applicant shall pay $219 per residential unit to the PCAPCD's Offsite Mitigation Program (total fee due is $166,144) to offset 6.35 tons of ROG and 2.75 tons of NOx. The payment of the fee shall be apportioned based on the number of residential lots created per each small lot final map and shall be due prior to each final map approval. (Draft EIR, pp. 11-24 to 11-25, Final EIR, p. 2-19; see also Response to Comment LA5-2 and 3.)	LS	**Finding:** Compliance with Mitigation Measure 11-6, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring the applicant to participate in PCAPCD's Offsite Mitigation Program to offset the Project's ROG and NOx emissions. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Operation of the project would exceed PCAPCD's cumulative impact threshold of 10 lbs. per day for ROG and NOX. Implementation Mitigation Measure 11-6 would require the project applicant to pay $219 per residential unit to the PCAPCD's Offsite Mitigation Program, prior each small lot final map approval, to offset the Project's ROG and NOx emissions. This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 11-24 to 11-25, Final EIR, p. 2-19; see also Response to Comment LA5-2 and 3.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
pay a fee towards PCAPCD's Land Use Air Quality Mitigation Fund, as outlined in Mitigation Measure 11-1b. By providing an in-lieu fee toward this fund, the proposed project's daily emissions of NOX would be offset below the recommended threshold of 82 lbs. per day. Therefore, the proposed project's contribution to cumulative impacts during construction would be mitigated through implementation of Mitigation Measures 11-1a and 11-1b. Long-term, operation-related emissions for the proposed project would not exceed PCAPCD's significance threshold for ROG, NOX, or PM10 for project-specific impacts. However, operation-related emissions of ROG and NOX would exceed PCAPCD's cumulative impact threshold of 10 lbs. per day. At buildout, project operation would emit 39.9 lbs. per day of NOX and 79 lbs. per day of ROG during the summer ozone season and 41.0 lbs. per day of NOX and 79 lbs. per day of ROG during the winter season. Total development proposed under the project would be within overall development allowable by current zoning and the land use designations established in the County General Plan. This is noteworthy because the amount of development anticipated by the County General Plan, as well as the general plans of other counties and cities located in the region, is used to inform air quality planning efforts, including the Ozone Attainment Plan. However, operational emissions of ozone precursors, ROG and NOX, would be substantially higher than PCAPCD's cumulative impact threshold of 10 lbs. per day. Thus, this impact would be cumulatively significant. It is important to note that while construction and operational activities of subsequent phases would overlap, PCAPCD has indicated that the two activities should be treated separately and emissions from both activities should not be considered together when compared with the thresholds. This is meant to allow that construction and operational activities be appropriately mitigated, as necessary (Green, pers. comm., 2015). (Draft EIR, p. 11-24.)			
Cumulative Impact 11-7: Cumulative emissions of particulate matter	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002;

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
(LS) Placer County is designated as attainment/unclassified with respect to the NAAQS for particulate matter with an aerodynamic diameter of 10 micrometers or less (PM10) but as nonattainment with respect to the CAAQS. Like ozone, PM10 has a similar cumulative, regional emphasis when particulate matter emitted by multiple projects are entrained into the atmosphere and build to unhealthful levels over time. Emissions of PM10 from both project construction and operation were determined to be less than significant as discussed in Impact 11-1and because operations would not exceed PCAPCD's recommended threshold of 82 lbs./day as discussed under Impact 11-2. The threshold of 82 lbs./day is considered to represent the allowable incremental contribution of PM10 by a project while still progressing toward overall attainment within Placer County. Because emissions-generating construction activity would be short-term and intermittent, and because most of the operational emissions of PM10 would be from mobile sources and therefore dispersed among area roadways, project-generated emissions of PM10 would not be cumulatively considerable. Construction-generated PM10, however, also has the potential to cause significant local problems during periods of dry conditions accompanied by high winds, and during periods of heavy earth disturbing activities. PM10 may have cumulative local impacts if, for example, several grading or earth-moving projects are underway simultaneously at nearby sites. Of the reasonably foreseeable cumulative projects (Draft EIR Chapter 11, Table 11-2), only construction of the Brockway Campground Project and Northstar Highlands Phase II could involve substantial earth moving and PM10 emissions in close proximity to construction that would take place under the MVWPSP and be constructed at the same time. However, the Brockway Campground Project, which proposes to develop campsites and associated facilities, would require relatively minor earth disturbance; major grading, excavation, and utility construction is not anticipated. Dust emissions from the Northstar Highlands Phase II would likely have dissipated because the project is 3 miles away from the MVWPSP area. Additional project construction would			CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
comply with dust regulations as outlined by PCAPCD Rule 228 and other projects would be required to do the same. Therefore, even if some construction of the land uses proposed under the MVWPSP occurred simultaneously with the Brockway Campground Project and Northstar Highlands Phase II, and PM10from the MVWPSP area reached a local sensitive receptor concurrently with PM10 generated by construction of the other projects, the contribution from the MVWPSP would be minor and would not make a substantial contribution to the cumulative PM10 emissions. Because project-generated PM10 emissions would not interfere with progress toward overall attainment of the CAAQS and NAAQS for PM10 within Placer County, or contribute to high localized concentrations in combination with simultaneous, nearby construction projects, they would not be cumulatively considerable and therefore would be less than significant. Placer County is designated as attainment/unclassified with respect to the CAAQS for PM2.5 and nonattainment-partial with respect to the NAAQS for PM2.5. Because PCAPCD does not recommend a mass emission thresholds for evaluating PM2.5 emissions but does so for PM10, the analysis of PM2.5 generally follows the analysis of PM10. For the reasons described above for PM10, the project would not make a significant contribution to a significant regional or local cumulative PM2.5 impact (Draft EIR, pp. 11-25 to 11-26.)			
Cumulative Impact 11-8: Cumulative exposure to mobile-source carbon monoxide (CO) concentrations (LS) As stated under Impact 11-3, mobile-source carbon monoxide (CO) generation is less of a concern today as in prior decades; CO has been reduced to such an extent by modern vehicles and the total state vehicle fleet that CO "hotspots" (CO emissions above air quality standards adopted for the purpose of protecting against exposure concentrations that can affect oxygen levels in blood leading to chronic and acute health risks, see Draft EIR Chapter 11, Table 11-1) are rare. The potential for hotspots	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
is associated with large, highly congested intersections, such as at two major, multi-lane highways. Under future conditions, when traffic from cumulative development is considered (see Cumulative Impacts to Intersection Operations from Chapter 10, "Transportation"), six signalized intersections, SR 267/I-80 Westbound (WB) Ramps, SR 267/I-80 Eastbound (EB) Ramps, SR 267/Brockway Road/Soaring Way, SR 267/Schaffer Mill Road/Truckee Airport Road, SR 267/Highland View Road, and SR 267/Project Access Roadway (Plus Project Only), would operate at maximum acceptable levels of service. However, SR 267 itself is a two-lane highway with turn pockets at intersections to roads or ramps that are one or two lanes. Therefore, these intersections are not indicative of the type of intersection that would experience a CO hotspot, given it has one travel lane and turn pockets in each direction. The volume of traffic at these intersections would not be sufficient to create a CO hotspot. (Draft EIR, p. 11-26.)			
Cumulative Impact 11-9: Cumulative emissions of sensitive receptors to toxic air Contaminants (LS) As stated under Impact 11-4, the project would not generate significant health risks associated with toxic air contaminants; it would not expose any single receptor to a level of cancer risk that exceeds an incremental increase of 10 in one million, or to a non-carcinogenic Hazard Index of 1. This conclusion is based on the fact that construction generated emissions of diesel PM would be short-term and intermittent, and would not occur for an extended period of time near any potential onsite receptors. Also, back-up diesel generators would only be operated during power failures and periodic testing and idling time of delivery trucks would be limited to 5 minutes by the California airborne toxics control measure incorporated in Title 13, Section 2485 of CCR. The same conclusion would apply to diesel PM emissions associated with the construction of other residential development projects outlined in Draft EIR Chapter 4, Table 4-2. Brockway Campground Project and Northstar Highlands Phase II could involve the	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
use of diesel equipment that would generate diesel PM emissions in close proximity to construction that would take place under the MVWPSP and be constructed at the same time. However, the Brockway Campground Project would require fairly minimal construction activities to build 600 campsites and the Northstar Highlands Phase II project is 3 miles away—a distance sufficient to allow substantial PM dispersal and dilution. Also, the use of off-road heavy-duty diesel equipment would occur only during construction, which would be limited to the period between May 1 and October 15 of each construction year. Other projects would also be subject to such construction period limitations. Therefore, project-generated emissions of diesel PM would not make a significant contribution to a significant cumulative impact, if one were to occur. For the reasons described above, it is not anticipated that the levels of health risk exposure from the proposed MVWPSP, in combination with health risk exposure of any other toxic air contaminant-emitting sources, would reach levels which would be considered a significant cumulative impact. (Draft EIR, pp. 11-26 to 11-27.)			
Cumulative Impact 11-10: Cumulative emissions of sensitive receptors to odors (LS) The project would not generate significant odors, as discussed under Impact 11-5. There are no existing facilities in the project vicinity typically considered as sources of objectionable odors such as wastewater treatment facilities, landfills, food processing facilities, and livestock operations. While a sewer lift station might be constructed in the northeast portion of the project site, near SR 267 and at the edge of where residential development is proposed, it would either be placed underground in a large manhole/vault or would be enclosed in an aboveground structure, which would provide both noise attenuation and odor control. None of the cumulative projects identified in Draft EIR Chapter 4, Table 4-2 include land uses that would generate objectionable odors that would affect a substantial number of people or that would travel far enough to interact with other potential odor sources. There are no facilities or activities in the vicinity of the MVWPSP project site that would interact to create a significant	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
cumulative odor impact, and neither the proposed project nor reasonably foreseeable future projects would generate objectionable odors that would change this condition. (Draft EIR, p. 11-27.)			
GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE			
Impact 12-1: Construction-generated greenhouse gas emissions (LS) Annual GHG emissions from project construction would range from a low of 431 MT CO2e to a high of 1,070 MT CO2e over an estimated 16 year period. Peak-year construction-generated GHG emissions would not exceed PCAPCD's recommended Tier I mass emission threshold of 1,100 MT CO2e, and in most years, would be well below the threshold. Therefore, GHG emissions from project-related construction would not be substantial. (Draft EIR, pp. 12-11 to 12-12; see also Master Response 7, Response to Comment IO41-56.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 12-2: Operational greenhouse gas emissions (PS) Annual GHG emissions from project operation would exceed the Tier I mass-emission threshold of 1,100 MT CO2e/year. GHG emissions would be substantial when the MVWPSP is built out. Therefore, operation of the Specific Plan has the potential to result in a substantial contribution to GHG emissions. (Draft EIR, pp. 12-13 to 12-16, Final EIR, pp. 2-20 to 2-25; see also Master Response 6 and 7, Response to Comment RA1-1 to 3, IO41-56 to 63.)	Mitigation Measure 12-2: Implement ongoing operational greenhouse gas review and reduction program The state legislature or Governor's Office may establish new GHG targets or other programs or metrics that apply both before and after 2020, as discussed in the First Update to the Climate Change Scoping Plan, released by ARB in May 2014 (and discussed above in Section 12.2.2) and in response to CBD v CDFW as it relates to connecting Scoping Plan targets to individual projects. Any projects processed by the County will be required to reduce, to the extent needed and feasible, GHG emissions such that the project operates within the targets or adopted plan established at the time the project is submitted for approval, as explained below. The County shall require the following actions for all MVWPSP subdivision maps submitted for approval: • In consultation with the PCAPCD and Placer County, the applicant shall demonstrate, based on currently adopted regulations and industry-accepted GHG calculation methods, whether operation of the project would be	SU	**Finding:** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. However, the Board of Supervisors finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the Project's impacts to greenhouse gas emissions, as more fully stated in the Statement of Overriding Considerations. **Explanation/Facts in Support of Finding:** The Project would exceed the Tier I mass-emission threshold of 1,100 MT CO2e/year. GHG emissions would be substantial when the MVWPSP is built out, and has the potential to result in a substantial contribution to GHG emissions. To lessen this potentially significant effect, the Project is required to implement Mitigation Measure 12-2, which will require the project applicant to demonstrate consistency with GHG targets or plans adopted by the state when submitting subdivision maps. If the project does not meet the GHG targets, additional feasible mitigation measures will be required, though the Project can choose from the options listed in Mitigation Measure 12-2, as long as the overall target is met. However, given the 20-year buildout, it is unknown whether the project would achieve threshold targets because they do not yet exist and it would be speculative to assume what they might be and what regulations may be in place to help achieve them. Therefore, this impact is considered potentially significant and unavoidable.

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	consistent with GHG targets adopted by the State. "Adopted" means that a specific GHG reduction target, such as that currently specified in the Global Warming Solutions Act of 2006 (achieve 1990 levels by 2020), is required by state legislative action, state administrative action, by legislative action of Placer County, or an applicable qualified Climate Action Plan or similar GHG reduction plan approved by Placer County. The target or plan shall be based on a substantiated linkage between the project (or Placer County projects in general if a countywide qualified GHG reduction plan is approved) and statewide GHG reduction goals. • If the project achieves or exceeds the reduction target or plan, no further actions shall be required. • If the project does not meet the target, then measures shall be incorporated into the project to reduce GHG emissions to the target or plan level and to the extent feasible. Emissions reductions provided by these measures shall be calculated to determine if targets can be achieved. These measures may include any combination of GHG reduction actions needed to achieve the target, including: o Actions specified in MVWPSP Section 7.9, "Air Quality & Climate Change" but with mandated actions (instead of "should" or "encourage" the actions, use "shall"), A project can choose from the options shown below as long as the overall target is met: ▪ Requiring that all buildings exceed Title 24 energy-efficiency requirements by 15 percent. ▪ All new residential buildings shall meet or exceed the guidelines for the California ENERGY STAR® Homes Program (Policy ER-AQ5). ▪ Selecting a building's orientation, massing and fenestration design to maximize effective day lighting to reduce building energy requirements, without increasing glare and/or electric lighting loads that off set glare is required. The selection and extent of window glazing should vary, depending		(Draft EIR, pp. 12-13 to 12-17, Final EIR, pp. 2-20 to 2-27; see also Master Response 6 and 7, Response to Comment RA1-1 to 3, IO41-56 to 63.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	on the criteria required by the window's location, including solar heat gain, energy performance, day lighting, views and glare factors. Exterior sun controls (including porches, overhangs, trellises, balconies and shutters) shall be integrated into the building's fenestration design to effectively admit and block sun penetration as required (Policy ER-AQ6). ▪ Retain a Commissioning Agent (a professional qualified to evaluate and certify that a building is designed, constructed and functions in accordance with the building's specified operational requirements). Owners may choose to have the Commissioning Agent produce a re-commissioning manual for the building to assure it continues to meet established standards such as energy conservation and indoor air quality (Policy ER-AQ11). ▪ Efforts to reduce and recycle construction waste are required as well as regional procurement of construction materials when feasibly possible in order to reduce transport (Policy ER-AQ14). ▪ Installation of state-of-the-art energy efficient interior lighting (Policy ER-AQ17). ▪ Commercial retail buildings shall use automatic fixture sensors and low-consumption fixtures (Policy ER-AQ19). o Payment of GHG offset fees to an ARB-approved GHG reduction program. Project applicant will consent to any GHG reduction fees that may be applicable after January 1, 2020. (Draft EIR, pp. 12-16 to 12-17, Final EIR, pp. 2-25 to 2-27; see also Master Response 7, Response to Comment IO41-63.)		
Impact 12-3: Impacts of climate change on the project (LS) Climate change is projected to result in a variety of effects that would influence conditions in the MVWPSP project area including increased temperatures, leading to increased	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
wildland fire risk; changes to timing and intensity of precipitation, resulting in increased stormwater runoff and flood risk; and changes to snowpack conditions that could be more conducive to avalanche formation. However, there are numerous programs and policies in place to protect against and respond to wildland fire, as well as to protect new land uses and facilities from flooding and avalanche exposure. (Draft EIR, pp. 12-17 to 12-19.)			
Cumulative Impact 12-4: Cumulative greenhouse gas emissions (PS) The discussions of GHG emissions generated by construction and operation of the MVWPSP under Impacts 12-1 and 12-2 are inherently cumulative. GHG emissions from one project cannot, on its own, result in changes in climatic conditions; therefore, the emissions from one project must be considered in the context of their contribution to cumulative global emissions. The analyses above concludes that the level of GHG emissions generated by the project would not conflict with the ARB Climate Change Scoping Plan (ARB 2011) and First Scoping Plan Update (ARB 2014b), which contain the strategies California will implement to achieve the GHG reduction goals mandated by AB 32. However, MVWPSP buildout would not occur until after 2020, the horizon year for AB 32, and additional and stricter GHG target levels may be adopted. Important factors are not currently known, such as the GHG emissions target in effect at the time that projects are submitted after 2020; the effectiveness of regulatory actions already adopted as part of the implementation of AB 32 (effectiveness has been calculated, but the update to the First Scoping Plan Update suggests they may be more effective than needed to achieve 2020 target levels); and the potential for new regulations and their effectiveness. Therefore, it would be speculative to determine that GHG impacts, if they were to occur, would be feasibly mitigated to any future adopted GHG targets beyond 2020. For this reason, and because the MVWPSP would generate substantial GHG emissions, the project contribution to cumulative GHG emissions would be considerable.	No feasible mitigation is available.	SU	**Finding:** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. However, the Board of Supervisors finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the Project's cumulative greenhouse gas emissions impacts, as more fully stated in the Statement of Overriding Considerations. **Explanation/Facts in Support of Finding:** As discussed above, the Project would exceed the GHG efficiency-based Tier I threshold. Project phasing is expected to take 20 years and it would be speculative to determine that the Project GHG emissions would be sufficiently mitigated to meet the emissions reduction targets that may be in place. To lessen this potentially significant effect, the Project is required to implement Mitigation Measure 12-2, which will require the project applicant to demonstrate consistency with GHG targets adopted by the state when submitting subdivision maps. If the project does not meet the GHG targets, additional feasible mitigation measures will be required. Nevertheless, because the GHG targets and implementing regulations are unknown at this time, and because the Project would emit a substantial level of GHG emissions, this impact is considered potentially significant and unavoidable. (Draft EIR, p. 12-19, Final EIR, pp. 2-20 to 2-27; see also Master Response 6 and 7, Response to Comment RA1-1 to 3, IO41-56 to 63.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
(Draft EIR, p. 12-19; see also Master Response 6 and 7, Response to Comment RA1-1 to 3, IO41-56 to 63.)			
Cumulative Impact 12-5: Cumulative impacts of climate change on the project (LS) The discussion of the impacts of climate change on the project under Impact 12-3 concludes that the MVWPSP would include sufficient design features to increase the development's resiliency to elevated risk of wildfires, flooding, and avalanches that may become more prevalent with climate change. Because the MVWPSP contains goals and policies that enhance its resiliency to these potential effects from climate change, buildout of the MVWPSP would not make a considerable contribution to any potential significant cumulative impact related to the effects of climate change on existing and future projects. (Draft EIR, p. 12-19.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
NOISE			
Impact 13-1: Construction noise impacts (S) The project site is currently undeveloped and no sensitive land uses currently exist in close proximity to proposed construction areas. However, as development under the MVWPSP is constructed, new sensitive receptors may be located adjacent to, or in close proximity to, ongoing construction. Because road construction, site preparation (including potential blasting, if any), and utilities installation would occur in the initial phases of the project and before the construction and occupancy of residences, there would be no impact from these activities on future sensitive receptors. Although daytime construction noise is exempt by the Placer County municipal code and a majority of the construction would take place during the exempt hours, construction activities would occur for an extended period of time, would be located in close proximity to future planned sensitive receptors, and would result in relatively high noise levels, with temporary increases over ambient noise levels. For these reasons, construction-related noise during the daytime (Placer County exempted hours) may result in excessive noise levels that disturb future sensitive receptors.	**Mitigation Measure 13-1: Implement construction-noise reduction measures** To minimize noise levels during construction activities, construction contractors shall comply with the following measures during construction: • All construction equipment and equipment staging areas shall be located as far as possible from nearby noise-sensitive land uses. • All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation. • When future noise-sensitive uses are within close proximity to noise-generating construction activity that will take place for more than three days, noise attenuating buffers such as structures, truck trailers, temporary noise curtains or sound walls, or soil piles shall be located between noise sources and the receptor to shield sensitive receptors from construction noise. The sound barrier, whatever the type, shall be tall	LS	**Finding:** Compliance with Mitigation Measure 13-1, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring noise reduction equipment, including mufflers and barriers, and notification to nearby noise-sensitive land uses. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Construction of Phase 0 of the project would not result in noise impacts because the site is currently undeveloped and there are no noise-sensitive land uses in close proximity. As the project gets built out, construction activities would occur for extended periods of time near future noise-sensitive land uses. Mitigation Measure 13-1 would substantially lessen this impact to less-than-significant by requiring equipment be located as far as possible from noise-sensitive land uses, the use and proper maintenance of mufflers and engine shrouds on construction equipment. Mitigation Measure 13-1 also requires the use of noise barriers when construction activities occur within close proximity to noise-sensitive land uses and notification to those noise-sensitive land uses when construction activities will occur nearby. This plan will reduce impacts to a less-than-significant level.

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
(Draft EIR, pp. 13-14 to 13-17.)	enough to block the line of site between the noise sources and the affected receptors. • At least one week before the beginning of each construction phase written notification of construction activities shall be provided to all noise-sensitive receptors located within 2,500 feet of construction activities. Additional notifications shall be provided if there are substantive changes in construction operations or noise generating activities (e.g., need for nighttime construction, special notice for blasting). Notification shall include anticipated dates and hours during which construction activities are anticipated to occur and contact information, including a daytime telephone number, for the project representative to be contacted in the event that noise levels are deemed excessive. (Draft EIR, p. 13-17.)		(Draft EIR, pp. 13-14 to 13-17.)
Impact 13-2: Short-term construction vibration impacts (LS) Blasting could be required if a rock outcropping or shallow bedrock were encountered that could not be avoided. Vibration levels from blasting activities could result in structural damage and/or human disturbances at distances within 250 feet of blasting activities. However, there are no existing sensitive receptors or structures located within this distance to the project site or any area within the site. Further, blasting would only occur during the initial phases of site preparation and therefore would not occur in close proximity to future planned development. Therefore, blasting would not result in structural damage to existing or future buildings or vibration impacts to existing or future sensitive receptors. (Draft EIR, pp. 13-17 to 13-18.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 13-3: Exposure of new sensitive receptors to existing and new operational stationary noise sources (PS) The project would result in the development of a mix of residential and commercial/retail land uses, including new noise-sensitive receptors (e.g., single-and multi-family residences, condominiums). Existing ambient noise would not exceed Placer County	**Mitigation Measure 13-3: Reduce noise exposure to future sensitive receptors from new stationary noise sources** At the time of the permit application that includes any stationary sources of noise, the project applicant shall demonstrate that noise levels will meet applicable County standards at the nearest existing or planned sensitive receptor (e.g., residence). This may be done by providing the	LS	**Finding:** Compliance with Mitigation Measure 13-3, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by development and implement measures that would ensure noise levels from operations do not exceed applicable thresholds. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR.

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
land use noise standards for this type of development; therefore, new sensitive receptors would not be exposed to excessive noise levels from existing sources. However, new sensitive receptors would be located in close proximity to new stationary noise sources (e.g., HVAC units, electrical generators, parking lots) associated with development of the MVWPSP, which could expose these receptors to noise in excess of allowable noise levels. (Draft EIR, pp. 13-19 to 13-21.)	specifications of the noise source and/or a noise study to the County. In addition, the following measures shall be implemented to reduce the effect of noise levels generated by onsite stationary noise sources: • Routine testing and preventive maintenance of emergency electrical generators shall be conducted during the less sensitive daytime hours (i.e., 7:00 a.m. to 10:00 p.m.), per the Placer County Noise Ordinance. All electrical generators shall be equipped with noise control (e.g., muffler) devices in accordance with manufacturers' specifications. • External mechanical equipment, including HVAC units, associated with buildings shall incorporate features designed to reduce noise emissions below the stationary noise source criteria (i.e., 50 dB Ldn exterior / 45 dB Ldn interior, exterior daytime [7:00 a.m. to 10:00 p.m.] standards of 55 dB Leq/ 70 dB Lmax and the exterior nighttime [10:00 p.m. to 7:00 a.m.] standards of 45 dB Leq / 65 dB Lmax). These features may include, but are not limited to, locating equipment within equipment rooms or enclosures that incorporate noise reduction features, such as acoustical louvers, and exhaust and intake silencers. Equipment enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors. • Loading docks shall be located and designed so that noise emissions do not exceed the stationary noise source criteria described in this analysis (i.e., 50 dB Ldn exterior / 45 dB Ldn interior, exterior daytime [7:00 a.m. to 10:00 p.m.] standards of 55 dB Leq/ 70 dB Lmax and the exterior nighttime [10:00 p.m. to 7:00 a.m.] standards of 45 dB Leq / 65 dB Lmax) at any existing or planned sensitive receptor. At the time of conformity review application submittal for discretionary entitlement, the project applicant shall provide to the County a specialized noise study to evaluate specific design and ensure compliance with Placer County noise standards. Reduction of loading dock noise can be achieved by locating loading docks as far away as possible from noise-sensitive land uses, constructing noise barriers between loading docks and noise-sensitive		**Explanation/Facts in Support of Finding:** Operations and maintenance of the project could result in operational noise sources near future noise-sensitive land uses, including HVAC systems, cooling towers/evaporative condensers, loading docks, lift stations, and emergency generators. Mitigation Measure 13-3 addresses this impact by requiring design features to reduce operation noise impacts, such as acoustical louvers, exhaust and intake silencers, and using building design to place operational noise sources as far away as possible from noise-sensitive land uses. This plan will This plan will reduce potential impacts to a less-than-significant level. (Draft EIR, pp. 13-19 to 13-22.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	land uses, or using buildings and topographic features to provide acoustic shielding for noise-sensitive land uses. Final design, location, and orientation shall be dictated by findings in the noise study, if applicable. (Draft EIR, pp. 13-21 to 13-22.)		
Impact 13-4: Exposure of new and existing noise-sensitive receptors to operational project-generated transportation noise sources (PS) Implementation of the project would result in a maximum traffic noise increase of 0.8 dBA on affected roadway segments. Noise increases of less than 1 dBA would not be perceptible and would be substantially below the Placer County allowed noise increase of 5 dBA. No existing sensitive receptors would be exposed to substantial increases in noise. Implementation of the project would result in new sensitive receptors in close proximity to SR 267, potentially within the 60 dBA Ldn contour of the roadway. These receptors could be exposed to noise levels that exceed the Placer County exterior noise standard of 60 dBA Ldn for transportation-related noise. (Draft EIR, pp. 13-22 to 13-24.)	**Mitigation Measure 13-4a: Reduce exterior noise levels at potential future sensitive receptors along SR 267** The following design measures shall apply to new sensitive receptors developed as part of the MVWPSP that would be located within 350 feet of the centerline of SR 267 (i.e., the distance from the centerline that is conservatively estimated, based on the noise modeling, to result in exceedance of the Placer County transportation-related exterior noise standard of 60 dBA Ldn) or the 60 dBA Ldn noise contour, whichever is greater: • Orient new sensitive receptors such that outdoor activity areas (e.g., balcony, porch, backyard) are on the opposite side of the structure from SR 267, such that noise attenuation by the structure itself is sufficient to achieve the exterior noise standard; and/or • Achieve, through building design and choice of building materials, a minimum, 20 dBA of exterior-to-interior noise attenuation, so that interior noise levels comply with the Placer County interior noise standard of 45 dBA Ldn. Or, **Mitigation Measure 13-4b: Demonstrate compliance with Placer County noise standards through refined noise analysis** Alternatively, the project developer shall demonstrate to the satisfaction of Placer County, through refined, project specific modeling or other appropriate analysis, that interior and exterior noise levels at a given proposed residential site will meet Placer County noise standards. Such analysis shall consider then-current traffic levels, building design and orientation, and noise attenuating features, such as topography, intervening forest or other vegetation, and other noise barriers. The analysis shall be prepared by a qualified	LS	**Finding:** Compliance with Mitigation Measure 13-4a or 13-4b, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by development and implement measures that would ensure noise-sensitive land uses are protected from operational project-generated transportation noise. The Board of Supervisors hereby directs that one of these mitigation measures be adopted. The Board of Supervisors therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project would result in new sensitive receptors in close proximity to SR 267, potentially exposing them to noise levels that exceed the Placer County exterior noise standard of 60 dBA Ldn for transportation-related noises. Mitigation Measure 13-4a would require the project to use materials to achieve a 20 dBA of exterior-to-interior noise attenuation and design outdoor activity areas such that they are on the opposite side of the structure from SR 267, to reduce the exposure of sensitive receptors to transportation noise sources. Alternatively, Mitigation Measure 13-4b requires the project applicant to demonstrate compliance with the Placer County noise standard through refined noise analysis. This plan will reduce potential impacts to less than significant levels. (Draft EIR, pp. 13-22 to 13-25.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	acoustic professional using methods approved by Placer County. (Draft EIR, pp. 13-24 to 13-25.)		
Cumulative Impact 13-5: Cumulative Short-term construction noise (LS) The nature of construction noise effects are such that project-related construction activities would have to occur simultaneously and in close proximity to those of other projects for a cumulative effect to occur. Because the West Parcel development area is relatively isolated and, with the exception of the Brockway Campground Project, is substantially distant from the sites of related and foreseeable projects (see Draft EIR Chapter 4, Table 4-2), MVWPSP-generated construction noise would not combine with those of other projects. With regard to the Brockway Campground Project, although timing of environmental review, approval, and construction of the project is unknown, it is possible that if campground construction were to occur simultaneously with future phases of the MVWPSP, construction noise from vehicles and heavy equipment could cumulatively combine. However, the nature of the campground project would be such that substantial grading, excavation, trenching, or blasting would not be necessary for construction of campsites and support facilities, and construction noise would not be substantial. Further, Mitigation Measure 13-1 would ensure that project-generated construction noise would not exceed applicable noise standards or cause excessive noise during the sensitive time of the day. (Draft EIR, pp. 13-25 to 13-26.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 13-6: Cumulative Short-term construction vibration (LS) The nature of construction vibration effects are such that project-related construction activities would have to occur simultaneously and in close proximity to those of other projects for a cumulative effect to occur. Because the West Parcel development area is relatively isolated and, with the exception of the Brockway Campground Project, is substantially distant from the sites of related and foreseeable projects (see Draft EIR Chapter 4, Table 4-2),	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
MVWPSP-generated construction vibration would not combine with those of other projects. With regard to the Brockway Campground Project, although timing of environmental review, approval, and construction of the project is unknown, it is possible that if campground construction were to occur simultaneously with future phases of the MVWPSP, construction noise from vehicles and heavy equipment could cumulatively combine. However, the nature of the campground project would be such that it would be unlikely that substantial vibration-inducing activities (e.g., pile driving, blasting) would occur, and construction vibration would not be substantial. (Draft EIR, p. 13-26)			
Cumulative Impact 13-7: Cumulative Long-term ambient stationary source noise levels (LS) At buildout, stationary noise sources would be added throughout the project site; however, Mitigation Measure 13-3 would be required to reduce noise from new stationary sources. Mitigation Measure 13-3 would ensure that proper design considerations and noise reduction features are constructed, as necessary, to reduce exterior noise levels to receptors on the project site and off (e.g., The Brockway Campground project located to the south of the MVWPSP). Therefore, these sources would not combine with any noise sources from existing or future planned projects**.** (Draft EIR, p. 13-26.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 13-8: Cumulative Long-term ambient traffic-related noise levels (LS) Cumulative noise levels could be affected by additional buildout of surrounding land uses and increases in vehicular traffic on affected roadways. Several new large developments (e.g., Pollard Station, Joerger Ranch Specific Plan, Canyon Springs Subdivision) and others (see Draft EIR Chapter 4, Table 4-2 for a complete list) are planned in the project area, including areas within the Tahoe Basin. These projects in conjunction with project-generated traffic would result in additional traffic-related noise on surrounding roadways and would contribute to a cumulative traffic-	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
noise condition. However, because of the logarithmic nature of noise sources, a doubling of existing traffic would be required to result in a perceptible increase in noise (i.e., 3 dB). As discussed under Impact 13-4, implementation of the MVWPSP would result in additional traffic on roadways that currently experience relatively high traffic volumes, and the incremental increase in traffic as a result of the project would not result in a perceptible increase in noise (i.e., a maximum of 0.6 dB as shown in Draft EIR Chapter 13, Table 13-11). However, because future sensitive receptors could potentially be located within the 60 dBA Ldn contour of SR 267, Mitigation Measure 13-4a or 13-4b would be required to demonstrate compliance with Placer County noise standards. (Draft EIR, pp. 13-26 to 13-27.)			
GEOLOGY AND SOILS			
Impact 14-1: Exposure of people or structures to risk of loss, injury or death resulting from rupture of a known earthquake fault or strong seismic shaking (LS) The MVWPSP project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone; however, there are many faults in the vicinity of the project site, and two short fault traces are located within the project site, one on the West Parcel and one on the East Parcel. These faults could subject project components to ground shaking and ground failure. Proposed project structures would be designed and constructed in accordance with the current minimum seismic safety and structural design requirements set forth in the California Building Code. In addition, the MVWPSP includes policies pertaining to potential development in proximity to the West Parcel fault trace. Therefore, there would be no substantial risk of loss, injury, death, or property damage from strong seismic shaking or rupture of a known fault. (Draft EIR, pp. 14-15 to 14-16.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 14-2: Exposure of people or structures to risk of loss, injury, or death involving avalanche (LS) The West Parcel contains slopes steep enough to create an avalanche hazard;	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
however implementation of the MVWPSP would not result in development within these areas. The potential avalanche risk associated with development on the West Parcel would be further limited by MVWPSP Policy ER-AG1, which would require that tree removal on slopes that could generate avalanches be overseen by a qualified avalanche consultant. It is unknown how the conservation of the East Parcel would affect recreational use, including winter sports. No formal trails would be created by the proposed project, but it is assumed that use of the existing informal trails would continue with no change in the number of recreationalists on the East Parcel. (Draft EIR, pp. 14-16 to 14-17.)			
Impact 14-3: Risk to life or property through exposure to expansive or unstable soils, including soils that may become unstable as a result of the project (PS) The MVWPSP project site contains steep slopes, ancient landslides, moderately expansive soils, and soils that could subside. Although the extent of these areas within the West Parcel development area is limited, potential development on land associated with the proposed project could result in the exposure of people and property to risks associated with unstable soils. (Draft EIR, pp. 14-17 to 14-18.)	**Mitigation Measure 14-3: Submit a geotechnical investigation for all areas of planned development** The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Department (ESD) review and approval. The report shall address and make recommendations on the following: A. Road, pavement, and parking area design; B. Structural foundations, including retaining wall design (if applicable); C. Grading practices; D. Erosion/winterization; E. Special problems discovered onsite, (e.g., groundwater, expansive/unstable soils); and F. Slope stability. Once approved by the ESD, two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report. If the soils report indicates the presence of critically expansive or other soils problems that, if not corrected, could lead to structural defects, a certification of completion of the requirements	LS	**Finding:** Compliance with Mitigation Measure 14-3, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring the project applicant to submit a geotechnical report to the ESD and comply with the recommendations in the report. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project site contains steep slopes, ancient landslides, moderately expansive soils and soils that could subside. Development in these areas will be limited, but development could result in the exposure of people and property to risks associated with unstable soils. Mitigation Measure 14-3 addresses this impact by requiring the project applicant to submit a geotechnical report, from a registered Civil or Geotechnical Engineer, to the ESD. Following approval, the applicant shall comply with the recommendations in the report. This plan will reduce potential impacts to less than significant levels. (Draft EIR, pp. 14-17 to 14-18.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	of the soils report will be required for subdivisions, before issuance of Building Permits. This certification may be completed on a Lot by Lot basis or on a Tract basis. This requirement shall be so noted on the Improvement Plans, in the CC&Rs, in the Development Notebook, and on the Informational Sheet filed with the Final Subdivision Map(s). (Draft EIR, p. 14-18.)		
Impact 14-4: Potential for substantial soil erosion or loss of topsoil (S) Development on the West Parcel would involve grading and excavation activities that could increase the potential for soil erosion because of vegetation removal, soil disturbance, and soil compaction. The construction activities resulting from the proposed project would create ground disturbance within soil units that have a moderate to very severe erosion hazard rating. This indicates that erosion is likely to occur and may be significant in some areas, potentially resulting in loss of soil productivity and offsite damage. (Draft EIR, pp. 14-18 to 14-20.)	**Mitigation Measure 14-4a: Prepare and implement a stormwater pollution prevention plan** Implement Mitigation Measure 15-1. As a condition of the SWRCB Statewide Construction General Permit, the project applicant shall prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP will be prepared by a qualified SWPPP practitioner and/or a qualified SWPPP developer, will specify water quality controls consistent with Lahontan RWQCB requirements, and will ensure that runoff quality maintains beneficial uses of Middle Martis Creek. The site-specific SWPPP developed for each construction phase will describe the site controls, erosion and sediment controls, means of waste disposal, implementation of project specific plans required by local regulations, control of post-construction sediment and erosion control measures, and other impact reduction strategies unrelated to stormwater. **Mitigation Measure 14-4b: Prepare and submit required plan materials to Placer County** The project applicant shall prepare and submit Improvement Plans, specifications, and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities	LS	**Finding:** Compliance with Mitigation Measure 14-4a, 14-4b, 14-4c, 14-4d, 14-4e, 14-4f, 14-4g, and 14-4h, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by assure compliance with Placer County codified regulations pertaining to potential grading and construction-related impacts as well as assuring that construction impacts to groundwater will be reduced to a less than significant level. The Board of Supervisors hereby directs that these mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project's construction activities would create ground disturbance within soil units that have moderate to very severe erosion hazard ratings, indicating that erosion is likely to occur and may be significant in some areas, potentially resulting in loss of soil productivity and offsite damage. Mitigation Measures 14-4a, 14-4b, 14-4c, 14-4d, 14-4e, 14-4f, 14-4g, and 14-4h will require the project applicant to implement an stormwater pollution prevention plan, identify ground disturbance areas and develop a revegetation plan, use approved design standards for Best Management Practices ("BMPs") to mitigate erosion impacts, install source control and low impact development standards, comply with grading season prohibitions, and verify NPDES stormwater pollution prevention plan compliance with Placer County. This plan will reduce impacts to less than significant levels. (Draft EIR, pp. 14-18 to 14-23.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. It is the project applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed before submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD before acceptance by the County of site improvements. Building Permits associated with this project shall not be issued until, at a minimum, the Improvement Plans are approved by ESD. Before the County's final acceptance of the project's improvements, submit to the ESD two copies of the Record Drawings in digital format (on compact disc or other acceptable media) in accordance with the latest version of the Placer County Digital Plan and Map Standards along with two blackline hardcopies (black print on bond paper) and two PDF copies. The digital format is to allow integration with Placer County's Geographic Information System (GIS). The final approved blackline hardcopy Record Drawings will be the official document of record. **Mitigation Measure 14-4c: Identify ground disturbance areas and develop revegetation plan** The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall		

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the ESD concurs with said recommendation. Fill slopes shall not exceed 1.5:1 (horizontal: vertical). The project applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Soil stockpiling or borrow areas shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the ESD. The project applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate for winterization and permanent erosion control work before Improvement Plan approval to guarantee protection against erosion and improper grading practices. Upon the County's acceptance of improvements, and satisfactory completion of a one-year maintenance period, unused portions of said deposit shall be refunded to the project applicant or authorized agent. If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals before any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body. **Mitigation Measure 14-4d: Provide Placer County with verification of compliance with NPDES SWPPP**		

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	Prior to construction commencing, the applicant shall provide evidence to the Placer County Engineering and Surveying Division of a Waste Discharge Identification (WDID) number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit. **Mitigation Measure 14-4e: Use approved design standards for BMPs** The Improvement Plans shall show that water quality treatment facilities/best management practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Department (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions). Construction (temporary) BMPs for the project include, but are not limited to: Hydroseeding (EC-4), Straw Mulch (EC-6), Velocity Dissipation Devices (EC-10), Silt Fencing (SE-1), Fiber Rolls (SE-5), Storm Drain Inlet Protection (SE-10), Wind Erosion Control (WE-1), and Stabilized Construction Entrances (TC-1). **Mitigation Measure 14-4f: Installation of source control and Low Impact Development standards** This project is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001-DWQ), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit.		

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	The project shall implement permanent and operational source control measures as applicable. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans. The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management. **Mitigation Measure 14-4g: Comply with grading season prohibitions** There shall be no grading or other disturbance of ground between October 15 of any year and May 1 of the following year, unless an extension has been granted by the ESD. **Mitigation Measure 14-4h: Comply with grading season prohibitions** Per the State of California NPDES Phase II MS4 Permit, the MVWPSP project is a Regulated Project that creates and/or replaces 5,000 square feet or more of impervious surface. A final Storm Water Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or as a separate document that identifies how the project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface are also required to demonstrate hydromodification management of stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2-year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions. (Draft EIR, pp. 14-20 to 14-23.)		

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
Cumulative Impact 14-5: Cumulative, long-term exposure of people or property to rupture of a known fault or strong seismic shaking (LS) The proposed project and the cumulative projects described above would be located in seismically active areas with known faults and could subject persons or property to strong seismic shaking. Ground shaking could result in the collapse of buildings and other structures and structures can be damaged or destroyed by ground rupture at an active fault. Without mitigation, the development of the West Parcel and of other cumulative projects could create a significant additive increase in the number of persons or properties exposed to potential ground rupture and seismic shaking. Overall, the potential cumulative impact is minimized through compliance with the California Building Code which contains protective provisions for structure placement and design. Additionally, the geotechnical investigations required for projects in Placer County include site specific geological analysis that may identify small or previously unmapped faults that could be significant to individual projects. Although there are no known active faults within the proposed development area, the proposed project would allow development in the vicinity of a small fault that has been recently determined to be inactive. The potential for the proposed project to contribute to cumulative seismic impacts would be fully mitigated through implementation of MVWPSP Policy ER-AG4, which states that any development proposed in proximity to the West Parcel fault trace would require a reevaluation of the fault to determine its precise location and its level of activity. If new, more detailed evaluation determines that the fault is potentially active, structures would be set back and engineered, in accordance with recommendations by the geotechnical engineer, to withstand a seismic event based on the potential strength of the fault (Holdrege & Kull 2013). (Draft EIR, pp. 14-23 to 14-24.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 14-6: Cumulative, long-term exposure of persons or property to avalanche hazards (LS) Portions of the rugged high elevation	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
terrain in the upper portions of the Martis Creek watershed have the potential to generate avalanches. The expansion of development and recreational uses in these areas could result in a significant cumulative increase in avalanche exposure. Placer County has mitigated this potential risk by identifying geologic hazard districts (which include areas subject to avalanche). Any permit application for a project located within a geologic hazard district with an avalanche risk must be accompanied by a report prepared by a recognized avalanche expert approved by the planning director. This report must identify potential threats to the project and recommend design modifications or setbacks that reduce the risk to an insignificant level (Placer County Code 17.52.100). Additionally, in areas outside a mapped hazard district, avalanche risk would be identified and addressed by the geotechnical report prepared for a project. While compliance within these regulations cannot eliminate the risk associated with avalanche, it can reduce the probable impact to an acceptable level. Finally, the MVWPSP proposes a conservation easement or sale to a conservancy of the entire East Parcel. As a result, no development would occur on the East Parcel. Although the East Parcel contains areas of avalanche terrain, it is assumed for purposes of analysis that post-project use of informal trails would continue in a manner consistent with existing use. The project would not change any exposure of recreationalists to avalanche hazards. The MVWPSP would comply with Placer County regulations, reducing the project's potential risk to an acceptable level. (Draft EIR, p. 14-24.)			
Cumulative Impact 14-7: Cumulative, long-term exposure of people or property to landslides or unstable soils (LS) The mountainous terrain within the Martis Creek Watershed contains many steep slopes that may be subject to slope instability, debris flows, and rock fall. In addition, areas of expansive soils and soils that could be vulnerable to liquefaction and lateral spreading exist within the watershed (NRCS 2015). Development and recreational projects within the watershed, including the MVWPSP, could increase the number of people that live, work,	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
or recreate in these areas, potentially resulting in a significant cumulative increase in exposure of persons or property to the risks associated with unstable soils. However, existing regulations (the California Building Code and Placer County Code of Ordinances) require evaluation of soil and geological hazards and design accommodation to address any potential hazards before approval of a building permit. While compliance within these regulations cannot eliminate the risk associated with unstable soils, it can reduce the potential impact to an acceptable level. Although the potential for a significant cumulative impact exists by virtue of the steep slopes and soil characteristics in the region, the proposed project would implement Mitigation Measure 14-3, which would reduce the potential for exposure of life and property to unstable or expansive soils by requiring site-specific geotechnical investigations for all project development and requiring specialized design of any structures located within the area of the ancient landslide. (Draft EIR, pp. 14-24 to 14-25.)			
Cumulative Impact 14-8: Cumulative impacts of erosion or loss of topsoil The proposed MVWPSP and other projects within the Martis Creek Watershed would create ground disturbance and expose soils to erosion by wind and water. Increased erosion could lead to the loss of top soil and a decrease in vegetative productivity within the watershed. Invasive species could colonize disturbed areas and replace native vegetation. Additionally, sediments carried in stormwater can be deposited into surface waters and can negatively impact water quality. The MVWPSP in combination with individual ground disturbance projects throughout the watershed could have an additive or cumulative adverse effect on the ecosystem of the watershed and on Martis Creek itself. However, the proposed MVWPSP and the cumulative projects listed above would be subject to the same regulatory measures and permit conditions that require the stabilization and revegetation of disturbed areas, erosion control features, and water quality BMPs. In addition, the proposed project and cumulative projects	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
would be subject to standard Placer County permit conditions described in Mitigation Measures 14-4a through 14-4h. Implementation of these mitigation measures would minimize ground disturbance and require installation of temporary and permanent erosion control BMPs, revegetation of disturbed areas, and compliance with Placer County construction oversight provision. Placement of the East Parcel (which encompasses one quarter of the Martis Creek watershed land area) into a conservation easement or sale to a Land Trust would further protect areas of steep slopes and unstable soils from development. (Draft EIR, p. 14-25.)			
HYDROLOGY AND WATER QUALITY			
Impact 15-1: Violate any water quality standard or water discharge requirement, or otherwise substantially degrade water quality: Construction impacts (PS) Implementation of the MVWPSP would require multiple phases and several seasons of construction that would involve grading, earth moving, excavation, underground infrastructure installation, and building construction. Sediments carried in runoff from construction sites and disturbed areas could be carried into surface water. Additionally, potential leakage or spills of construction related contaminants could affect the water quality of Middle Martis Creek and the groundwater basin. (Draft EIR, pp. 15-17 to 15-18; see also Response to Comment IO31-12, IO41-77, SA2-3 and 4.)	**Mitigation Measure 15-1: Prepare and Implement a Stormwater Pollution Prevention Plan for each construction phase** Each construction phase of the project shall be subject to the Statewide Construction General NPDES Permit from Lahontan RWQCB. As a condition of the NPDES permit, the project applicant shall develop a Stormwater Pollution Prevent Plan (SWPPP) prepared by a qualified SWPPP practitioner and/or a qualified SWPPP developer, which specifies water quality controls consistent with Lahontan RWQCB requirements and ensures that runoff quality maintains beneficial uses of Middle Martis Creek. The site-specific SWPPP developed for each construction phase shall describe the site controls, erosion and sediment controls, means of waste disposal, implementation of project specific plans required by local regulations, post-construction sediment and erosion control measures, and other impact reduction strategies unrelated to stormwater. BMPs identified in the SWPPPs shall be implemented during all development activities. Required elements of the SWPPPs include the following: • Temporary BMPs to prevent the transport of earthen materials and other construction waste materials from disturbed land areas, stockpiles, and staging areas during periods of precipitation or runoff, including: filter fences, fiber rolls, erosion control blankets, mulch (such as pine needles and wood chips); and temporary drainage swales and	LS	**Finding:** Compliance with Mitigation Measure 15-1, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring a Stormwater Pollution Prevention Plan for each phase of development. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project's construction activities could result in sediments and contaminants affecting the water quality of Middle Martis Creek and the groundwater basin. Mitigation Measure 15-1 will require a Stormwater Prevention Plan, outlining best management practices ("BMPs") for each phase of construction to ensure that runoff quality maintains beneficial uses of Middle Martis Creek. Specifically, BMPs to prevent transport of sediments and contaminants from disturbed land areas, avoiding riparian areas, preventing wind erosion, a spill prevention and contamination plan, establishing construction activity boundaries to limit disturbance outside the project area, containment of runoff, drilling spoils, and protective fencing to limit tree and vegitation loss. In addition, Mitigation Measures 14-4a through 14-4h also address control of stormwater runoff and contaminants within the project area. This plan will reduce potential impacts to less than significant levels. (Draft EIR, pp. 15-17 to 15-19; see also Response to Comment IO31-12, IO41-77, SA2-3 and 4.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	settling basins. • Designated contractor staging areas for materials and equipment storage outside of riparian areas. Designated staging and storage areas would be protected by construction fencing and/or silt barriers, as appropriate. Following project completion, all areas used for staging would be stabilized or revegetated. • Temporary BMPs to prevent the tracking of earthen materials and other waste materials from the project site to offsite locations, including stabilized points of entry/exit for construction vehicles/equipment and designated vehicle/equipment rinse stations, and sweeping. • Temporary BMPs to prevent wind erosion of earthen materials and other waste materials from the project site, including routine application of water to disturbed land areas and covering of stockpiles with plastic or fabric sheeting. • A spill prevention and containment plan to minimize the potential for soil and groundwater contamination during construction. Project contractors would be responsible for proper storage of onsite materials and installation and maintenance of temporary BMPs capable of capturing and containing pollutants from fueling operations, fuel storage areas, and other areas used for the storage of hydrocarbon-based materials. This would include maintaining materials onsite for the cleanup of accidental spills (such as oil absorbent booms and sheets), maintaining drip pans beneath construction equipment, training site workers in spill response measures, immediate cleanup of spilled materials in accordance with directives from the Lahontan RWQCB, and proper disposal of waste materials at an approved offsite location that is licensed to receive such wastes. • Temporary BMPs to capture and contain pollutants generated by concrete construction including lined containment for rinsate to collect runoff from washing concrete delivery trucks and equipment. • Protective fencing to prevent damage to		

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	trees and other vegetation to remain after construction, including tree protection fencing and individual tree protection such as protective casings of wood slats around the bases of trees. • Temporary BMPs for the containment or removal of drilling spoils generated from construction of bridge foundations and abutments. • Daily inspection and maintenance of temporary BMPs to ensure proper function. The prime contractor would be required to maintain a daily log of Temporary Construction BMP inspections and keep the log onsite during project construction, available for review by Lahontan RWQCB and Placer County. • Tree removal activities, including the dropping of trees, would be confined to the construction limit boundaries. • Construction boundary fencing to limit disturbance and prevent access to areas not under active construction. (Draft EIR, pp. 15-18 to 15-19.)		
Impact 15-2: Violate any water quality standard or water discharge requirement, or otherwise substantially degrade water quality: Operational impacts (S) The project would result in residential and commercial development of the West Parcel. The operational activities associated with these land uses could result in accidental or illicit discharges of household or commercial products or misuse of pesticides or fertilizers which can lead to contamination of surface and groundwater. In addition, urban stormwater runoff could carry pollutants into adjacent surface waters. (Draft EIR, pp. 15-19 to 15-20; see also Response to Comment IO31-12, IO41-77.)	**Mitigation Measure 15-2a: Install permanent water quality BMPs** The Improvement Plans shall show that water quality treatment facilities/best management practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Department (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions). Storm drainage from on- and offsite impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified pollutants, as approved by the Engineering and Surveying Department (ESD).	LS	**Finding:** Compliance with Mitigation Measure 15-2a, 15-2b, 15-2c, 15-2d, and 15-2e, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring permanent water quality best management practices ("BMPs"), source control and low impact development measures, discouraging illegal dumping, proper storage of potential contaminants and isolation of trash and storage areas away from stormwater flows. These measures will adequately reduce potential impacts to a level of less than significant. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project's operational activities, including household and commercial product, pesticide, and/or fertilizer uses could lead to the contamination of surface and groundwater. Mitigation Measure 15-2a, 15-2b, 15-2c, 15-2d, and 15-2e requires the project applicant to install permanent water quality BMPs including catch basins, vegetated swales, vaults, basins, etc. according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	BMPs shall be designed at a minimum in accordance with the Placer County Guidance Document for Volume and Flow-Based Sizing of Permanent Post- Construction Best Management Practices for Stormwater Quality Protection. Post development (permanent) BMPs for the project include, but are not limited to: Vegetated Swales (TC-30), Infiltration Trenches (TC-10), Water Quality Inlets (TC-50), Pervious Pavements (SD-20), Storm Drain System Signs (SD-13), and Detention Basins (TC-22). No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals. All BMPs shall be maintained as required to insure effectiveness. The applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of ongoing maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming, and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Before Improvement Plan or Final Subdivision Map approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance. **Mitigation Measure 15-2b: Identify storm drain inlets to discourage illegal dumping** The Improvement Plans shall include the message details, placement, and locations showing that all storm drain inlets and catch basins within the project area shall be permanently marked/embossed with prohibitive language such as “No Dumping! Flows to Creek.” or other language and/or graphical icons to discourage illegal dumping as approved by the Engineering and Surveying Department (ESD). ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping shall be posted at public access points along channels and creeks within the		Industrial and Commercial. The applicant shall identify storm drain inlets and discourage illegal dumping, install source control and Low Impact Development measures, isolate trash and storage areas away from stormwater flows, and store potential contaminants in enclosures approved by the Placer County Engineering and Surveying Department. This plan will reduce impacts to less than significant levels. (Draft EIR, pp. 15-19 to 15-21; see also Response to Comment IO31-12, IO41-77.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	project area. The Homeowners'/Property Owners' association is responsible for maintaining the legibility of stamped messages and signs. **Mitigation Measure 15-2c: Install source control and Low Impact Development measures** Implement Mitigation Measure 14-4f. The project shall comply with the Placer County MS4Permit, pursuant to the NPDES Phase II program. This includes the installation of source control and LID measures to reduce the volume of runoff generated by the project. **Mitigation Measure 15-2d: Isolate trash and storage areas from stormwater flows** The Improvement Plans shall show that all stormwater runoff shall be diverted around trash storage areas to minimize contact with pollutants. Trash container areas shall be screened or walled to prevent offsite transport of trash by the forces of water or wind. Trash containers shall not be allowed to leak and must remain covered when not in use. **Mitigation Measure 15-2e: Store potential contaminants in approved enclosures** The Improvement Plans shall show that materials with the potential to contaminate stormwater that are to be stored outdoors shall be placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure that prevents contact with runoff or spillage to the stormwater conveyance system, or protected by secondary containment structures such as berms, dikes, or curbs. The storage area shall be paved to contain leaks and spills and shall have a roof or awning to minimize collection of stormwater within the secondary containment area. (Draft EIR, pp. 15-20 to 15-21.)		
Impact 15-3: Substantially deplete groundwater supplies or interfere with groundwater recharge: use of existing NCSD water system (LS) One option for water supply for the West Parcel development area would be expansion	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
of the existing NCSD water system, which includes two springs, a reservoir, and two groundwater wells in the Martis Valley Groundwater Basin. This groundwater basin has been shown to have an average annual recharge rate of more than 32,000 acre feet per year (afy), which substantially exceeds the projected total water use at buildout of all development within the Martis Valley Groundwater Basin, estimated at 21,000 afy (Kaufman 2011). (Draft EIR, pp. 15-21 to 15-22; see also Master Response 8, Response to Comment IO41-74.)			
Impact 15-4: Substantially deplete groundwater supplies or interfere with groundwater recharge: Use of new onsite wells (PS) A second option for water supply for the MVWPSP development would be installation of groundwater wells on the West Parcel. By virtue of the elevation, topography, and subsurface geology of the project site, onsite wells would not directly access the Martis Valley Groundwater Basin. Rather, they would penetrate moderate permeability volcanic rock aquifers more typical of mountainous terrain. These aquifers have limited storage capacity and are more sensitive to pumping and climatic fluctuations. The groundwater recharge rates and surface/groundwater interactions within the West Parcel, specifically, are not well understood. (Draft EIR, pp. 15-23 to 15-24; see also Master Response 8, Response to Comment IO41-74, IO18-35 and 37.)	**Mitigation Measure 15-4a: Verify adequacy of groundwater supplies through modeling and supplement supplies, if necessary** The U.S. Bureau of Reclamation and the Desert Research Institute have developed an integrated surface water/groundwater model (GSFLOW) specific to the MVGB. The GSFLOW model uses a hydrologic framework specific to the Martis Valley, and shall be used to determine potential groundwater recharge rates for the West Parcel and to develop a calibrated water budget for the MVWPSP project. Groundwater modeling shall be completed by a qualified hydrologist and shall incorporate the surface water mapping completed for the MVWPSP, as it reflects the most accurate source of hydrologic data. The modeling results shall be used to estimate the quantity of groundwater that can be sustainably extracted from aquifers beneath the West Parcel. Modeling shall be completed before construction of the proposed wells. If the groundwater modeling determines that the water demand (325 afy) from project buildout exceeds that which can be sustainably withdrawn using onsite wells, supplemental water shall be provided via connection to the existing NCSD system. **Mitigation Measure 15-4b: Monitor surface and groundwater resources within the project area** Before the start of groundwater pumping, the project applicant and NCSD shall develop a long-term monitoring program for the surface and groundwater resources within the West Parcel. The goal of the monitoring plan will be to detect and assess long-term changes and trends	LS	**Finding:** Compliance with Mitigation Measures 15-4a and 15-4b, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring verification of adequate groundwater supplies and supplementing those supplies if necessary, as well as monitoring surface and groundwater resources in the project area. Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** If the Project's water supply is provided by groundwater wells, the elevation, topography, and subsurface geology would require the wells to access aquifers in moderate permeability volcanic rock, instead of the Martis Valley Groundwater Baisn. These aquifers have limited storage capacity and are more sensitive to pumping and climatic fluctuations. Mitigation Measure 15-4a and 15-4b would require the use of the GSFLOW surface/groundwater modeling computer software to estimate the quantity of groundwater that can be sustainably extracted from the aquifers beneath the West Parcel, and if that amount is exceeded by demand (325 afy), supplemental water shall be provided via the existing NCSD system. In addition the project applicant shall develop a long term surface and groundwater monitoring plan, in cooperation with the NCSD. The purpose of the monitoring will be to detect and assess the long term changes in hydrology because of pumping for municipal water supply, and to provide reasonable assurance of long-term pumping at sustainable rates. This plan will reduce potential impacts to less than significant levels. (Draft EIR, pp. 15-23 to 15-25; see also Master Response 8, Response to Comment IO41-74, IO18-35 and 37.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	in the hydrologic system because of pumping for municipal water supply, and to provide reasonable assurance of long-term pumping at sustainable rates. Surface waters shall be monitored to identify long-term trends and potential interactions between surface water volumes and groundwater pumping. The monitoring program shall identify drawdown and recovery threshold limits based on the performance of completed production wells. As an operational goal, the drop in groundwater elevation in the aquifer at each well shall not exceed a 20 percent drawdown of the water column for a period of time extending beyond three months. Aquifer responses shall be monitored by dedicated monitoring wells, and natural seasonal variance in water levels based pre-pumping monitoring will be factored into consideration. Monitoring wells may include test wells TW-3 and TW-5. As a component of its larger monitoring program, NCSD will be responsible for long-term monitoring of the performance of groundwater production wells on the project site, and adjusting pumping distributions between onsite or offsite water sources, if necessary. Surface waters shall be monitored to identify long term trends and potential interactions between surface water volumes and groundwater pumping. Reporting shall be completed annually or as otherwise dictated depending on the schedule of existing NCSD monitoring operations. (Draft EIR, pp. 15-24 to 15-25.)		
Impact 15-5: Substantially alter drainage patterns or increase surface runoff in a manner that would exceed the capacity of existing or planned stormwater drainage systems (PS) Implementation of the MVWPSP would result in the development of new impervious surfaces such as buildings and roads, leading to an increased potential for stormwater runoff. Because the project would result in new urban development over a large area that is currently undeveloped forest, it would substantially increase the peak flow and volume of stormwater runoff leaving the site. (Draft EIR, pp. 15-25 to 15-26; see also Response to Comment IO31-12, IO41-77, and	**Mitigation Measure 15-5a: Prepare and implement a final drainage report** As part of the Improvement Plan submittal process, the preliminary Drainage Report provided during environmental review shall be submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage	LS	**Finding:** Compliance with Mitigation Measure 15-5a and 15-5b, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring a final drainage report as part of the Improvement Plan and that the applicant reduce runoff to pre-project conditions. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Development of the project would result in new impervious surfaces, such as buildings and roads, leading to an increased potential for stormwater runoff. Mitigation Measure 15-5a and 15-5b, would require the project applicant to prepare a final drainage report which will address the effects of the proposed improvements, and all proposed on- and off-site improvements and drainage

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
SA2-3.)	easements to accommodate flows from the MVWPSP project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of Improvement Plan submittal. **Mitigation Measure 15-5b: Reduce runoff to pre-project conditions** The Improvement Plan submittal and final Drainage Report shall provide details showing that stormwater run-off shall be reduced to pre-project conditions through the installation of retention/detention facilities. Retention/detention facilities shall be designed in accordance with the requirements of the Placer County Stormwater Management Manual that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Department (ESD), and shall be shown on the Improvement Plans. The ESD may, after review of the project final drainage report, delete this requirement if it is determined that drainage conditions do not warrant installation of this type of facility. Maintenance of detention facilities by the homeowner's association, property owner's association, property owner, or entity responsible for project maintenance shall be required. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals. (Draft EIR, p. 15-27; Final EIR, p. 2-15; see also Response to Comment SA2-3.)		easements to accommodate the increased stormwater flows from the Project. In addition, the project applicant must reduce runoff to pre-project conditions through the installation of retention/detention facilities, unless the Engineering and Surveying Department does not believe the drainage conditions require retention/detention facilities. This plan will reduce potentially significant impacts to less than significant levels. (Draft EIR, pp. 15-26 to 15-27; Final EIR, p. 2-15; see also Response to Comment IO31-12, IO41-77 and SA2-3.)
Impact 15-6: Placement of housing or structures within a 100-year flood hazard area, redirection 100-year flood flows, or exposure people or structures to significant to significant risk of loss, injury or death involving flooding (PS) Although there are no FEMA-regulated 100-year flood hazard areas within the project area, the proposed project would result in the construction of a bridge over Middle Martis Creek and residential and commercial	**Mitigation Measure 15-6a: Delineate 100-year floodplain on subdivision maps** On the Improvement Plans and Informational Sheet(s) filed with the appropriate Large Lot or Small Lot Final Subdivision Map(s), show the limits of the future, unmitigated, fully-developed 100-year floodplain (after grading) for Middle Martis Creek and designate same as a building setback line, unless greater setbacks are required by other conditions contained herein.	LS	**Finding:** Compliance with Mitigation Measure 15-6a, 15-6b, 15-6c, 15-6d, 15-6e, and 15-6f, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring a final drainage report as part of the Improvement Plan and that the applicant reduce runoff to pre-project conditions. The Board of Supervisors hereby directs that these mitigation measures be adopted. Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project will

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
structures that could be located within the 100-year floodplain of Middle Martis Creek. (Draft EIR, pp. 15-27 to 15-28.)	**Mitigation Measure 15-6b: Demonstrate that all building pad elevations are a minimum of 2 feet above the 100-year floodplain line** The Improvement Plans and Informational Sheet(s) filed with the appropriate Large Lot or Small Lot Final Subdivision Map(s) shall show finished building pad elevations to be a minimum of two feet above the 100-year floodplain line (or finished floor three feet above the 100-year floodplain line). The final pad elevation shall be certified by a California registered civil engineer or licensed land surveyor and submitted to the Engineering and Surveying Department. This certification shall be done before construction of the foundation or at the completion of final grading, whichever comes first. No construction is allowed until the certification has been received by the Engineering and Surveying Department and approved by the floodplain manager. Benchmark elevation and location shall be shown on the Improvement Plans and Informational Sheet (s) to the satisfaction of Development Review Committee. **Mitigation Measure 15-6c: Construct Middle Martis Creek Bridge to span 100-year floodplain limits** The Improvement Plans for the construction of the main access road shall include the construction of a roadway bridge spanning the 100-year floodplain limits of Middle Martis Creek near the encroachment with SR 267. **Mitigation Measure 15-6d: Prohibit activities or construction that would increase the 100-year floodplain water surface elevation** The project applicant shall prepare a final drainage report at the time of submittal of the project's initial improvement plans that demonstrates that the project will not increase the limits or water surface elevation of the 100-year floodplain of Middle Martis Creek upstream or downstream of the project site. The report shall be submitted with the project's initial Improvement Plans, and shall be reviewed and approved by the Engineering and Surveying Department and the Placer County Flood Control District. The floodplain analysis shall be prepared in conformance with the Placer County Stormwater Management Manual that is in effect		result in a bridge over Middle Martis Creek and residential and commercial structures that could be located within the 100-year floodplain of Middle Martis Creek. However, there are no FEMA-regulated 100-year flood hazard areas within the project area. Mitigation Measure 15-6a, 15-6b, 15-6c, 15-6d, 15-6e, and 15-6f will require subdivision maps to delineate the 100-year floodplain of Middle Martis Creek, that all building pad elevations are a minimum 2 feet above the 100-year floodplain line, and the roadway bridge be constructed to span the 100-year floodplain of Middle Martis Creek. In addition, the drainage report prepared by the applicant shall prohibit construction or other activities that would increase the 100-year floodplain water surface elevation, and prohibit all grading activity within the 100-year floodplain. Lastly, the applicant shall maintain or if necessary construct, adequate flood storage within the 100-year floodplain of Middle Martis Creek. This plan will reduce potentially significant impacts to less than significant levels. (Draft EIR, pp. 15-27 to 15-29.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	at the time of submittal. **Mitigation Measure 15-6e: Maintain or construct adequate flood storage within the 100-year floodplain of Middle Martis Creek** The applicant shall maintain or construct adequate flood storage within the 100-year floodplain of Middle Martis Creek to the satisfaction of the ESD and the Placer County Flood Control District. This replacement storage shall only be associated with the construction fills associated with the roadway infrastructure required for development of the project. The applicant shall prepare an analysis to demonstrate the amount of storage to be replaced, the effect on flood flows of the replacement area, any effects on flood conveyance and methods to minimize any maintenance of the replacement storage. The size (volume) of this replacement shall be based on the volume of storage lost by project construction. Any required storage area shall be designed and shown on the applicable set of Improvement Plans for the project after the above analysis is approved by ESD and the Flood Control District. It shall be constructed concurrent with any grading taking place within the existing 100-year floodplain. **Mitigation Measure 15-6f: Prohibit grading within the 100-year floodplain** To protect site resources, no grading activities of any kind may take place within the 100-year floodplain of the stream/drainage way unless otherwise approved as a part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). A standard note to this effect shall be included on the Improvement Plans. The location of the 100-year floodplain shall be shown on the Improvement Plans. (Draft EIR, 15-28 to 15-29.)		
Cumulative Impact 15-7: Cumulative impacts that would violate water quality standards or waste discharge requirements (LS) Historic activities such as logging, milling,	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
mining, and overgrazing within the Middle Truckee River Watershed combined with runoff from urban and recreational developments, have degraded the water quality of the Truckee River and its tributaries, resulting in an existing cumulative adverse condition. Currently, at high stream flows, the concentrations of suspended sediment in the Truckee River exceed the water quality limits for protection of aquatic life (Lahontan RWQCB 2008). The 2008 Truckee River TMDL was developed to address sediment levels and as a result, Placer County has developed a stormwater management program. Additionally, numerous publicly and privately funded projects have been implemented to restore disturbed areas of the watershed and reduce this adverse condition. **Construction Impacts** The MVWPSP in combination with other projects in the Truckee River Watershed would involve construction activities that would create ground disturbance and increase the potential for soil erosion and sediment pollution of waterways. The equipment required for construction would use fuel, solvents, lubricants, and other potentially hazardous materials that could degrade surface and groundwater quality through accidental spills. Without mitigation, the construction activities of the proposed project and the cumulative projects described above would have the potential to create a significant cumulative impact to water quality. However, the project's potential impacts would be fully mitigated through implementation of Mitigation Measures 15-1. These mitigation measures reflect standard Placer County development permit conditions which would be applicable to the proposed project as well as the other cumulative projects. Buildout of the MVWPSP and other foreseeable development projects would be required to comply with Lahontan RWQCB NPDES permit conditions that include the development of a SWPPP and a Hazardous Materials Spill Response Plan and to comply with all Placer County stream setbacks. Because the MVWPSP and all other projects within the Truckee River Watershed would be required to comply with these protective regulations, the project's potential contribution to the existing cumulatively adverse water			

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
quality condition would not be cumulatively considerable, and the project would not result in a considerable contribution to a cumulative impact. **Operational Impacts** After development projects are completed, the everyday use of household and commercial products and the improper use of pesticides and fertilizers could allow pollutants to be carried in stormwater runoff or discharged into the soil to reach surface and groundwater resources. Without mitigation, the operational activities of the proposed project and the cumulative projects described above would create a significant cumulative impact to water quality. However, the potential impacts would be fully mitigated through implementation of Mitigation Measures 15 15-2a through 15-2e. These mitigation measures are standard Placer County permit conditions, which are applicable to all projects in the county and require proper containment of potential contaminants, installation of permanent water quality BMPs, and identification of storm drain inlets. Although the cumulative impact is significant, the project's contribution to the cumulative effect would be fully mitigated, such that the project would not contribute to the cumulative impact. (Final EIR, pp. 15-29 to 15-30; see also Response to Comment IO31-12.)			
Cumulative Impact 15-8: Cumulative impacts that would substantially deplete groundwater supplies or interfere with groundwater recharge (LS) The MVWPSP and other development projects within the Middle Truckee River watershed would rely on the Martis Valley Groundwater Basin and its tributary groundwater basins for their water supply. Overuse of groundwater resources can lower the groundwater table, affecting flow volumes in connected surface waters and springs. The proposed project would draw from existing NCSD groundwater wells within the Martis Valley Groundwater basin, or it would develop new groundwater wells within the West Parcel. **Use of Existing NCSD Groundwater Wells**	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
within the Martis Valley Groundwater Basin Groundwater within the MVGB has been extensively studied and is regularly monitored (Placer County 2007). It is constrained by the 2008 TROA, which was born out of litigation surrounding the declining water quantity and quality in Pyramid Lake and the resulting impacts to threatened and endangered species. TROA protects surface water flows by limiting the volume of diversions and groundwater withdrawal from the Truckee River Watershed, ensuring the quality and quantity of surface waters that reach Pyramid Lake. The limits set on the total amount of groundwater that can be pumped from the Martis Valley Groundwater Basin have been established to prevent overdrafting. The MVWPSP and all future projects that draw from the Martis Valley Groundwater Basin would only be permitted if they do not cause groundwater use to exceed established limits. The total estimated water demand at the time of maximum development within the area served by the Martis Valley Groundwater Basin is 21,000 afy, while the maximum pumping limit for the Basin is set at 32,000 afy. In addition, all wastewater generated by the proposed project would be treated at the T-TSA regional wastewater treatment plant in Truckee, and eventually infiltrated back into the Martis Valley Groundwater Basin. This would allow recycling rather than depletion of groundwater. Additionally, the Martis Valley Groundwater Management Plan (Placer County 2007) includes an extensive groundwater monitoring component. The existing protections against groundwater depletion within the Martis Valley Groundwater Basin have been established to prevent the development of a cumulative adverse impact to groundwater quantity. **Development of New Groundwater Wells within the West Parcel** In general, the tributary groundwater aquifers in the mountainous upper portions of the Middle Truckee River Watershed have not been well studied and their storage capacity, rate of recharge, and connectivity to surface waters is not well understood. Implementation of the proposed project and other development projects involving groundwater wells drilled in			

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
these smaller aquifers could result in a potentially significant cumulative impact related to depletion of groundwater resources. Although the cumulative impact is potentially significant, the proposed project's contribution would be fully mitigated through implementation of Mitigation Measures 15-4a and 15-4b. These mitigation measures would reduce potentially significant impacts to groundwater resources though more precise modeling of groundwater recharge rates within the West Parcel, adjusting groundwater production levels to match sustainable pumping rates indicated by the calibrated water budget, and supplementing water supplies through connection to NCSD's existing water supply system, if onsite groundwater supplies prove insufficient. In addition, implementing a long-term monitoring program would support compliance with drawdown and recovery thresholds and protect groundwater resources from overdraft. (Draft EIR, pp. 15-30 to 15-31; see also Master Response 8, Response to Comment IO41-74, IO18-35 and 37.)			
Cumulative Impact 15-9: Cumulative impacts that would substantially alter drainage pattern or increase surface runoff in a manner that would result in erosion, siltation, and flooding, or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems (LS) Development pursuant to the MVWPSP and development of the related in the Middle Truckee River Watershed would result in an increase in impervious surfaces and a corresponding increase in stormwater runoff. Without the installation of stormwater BMPs, the increase in runoff could exceed the capacity of existing stormdrain systems and cause localized flooding. Concentrated runoff that cannot be accommodated by stormdrains could also cause erosion of unprotected areas. This increase in area stormwater flows would be a significant cumulative impact and development of the MVWPSP would result in a cumulatively considerable contribution to this cumulative impact. However, the potential impact of the proposed project would be minimized through mitigation imposed by the CEQA environmental review process for	No mitigation is required	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
individual projects, Placer County Code requirements, the NPDES permitting system, and/or through application of project-specific mitigation measures. The NPDES permitting system requires that Placer County implement Stormwater Management Plans that control stormwater runoff and protect the quality of receiving waters. Finally, Mitigation Measures 15-5a and 15-5b require that all development resulting from the implementation of the proposed project would implement LID practices and stormwater infiltration facilities so that development does not result in an increase in runoff leaving the site. (Draft EIR, pp. 15-31 to 15-32; see also Response to Comment IO31-12.)			
Cumulative Impact 15-10: Cumulative impacts to 100-year floodplains or exposure of people or structures to significant risk of loss, injury, or death involving flooding (LS) Development associated with the proposed project and other cumulative projects could place structures within 100-year floodplains or alter the flow of flood waters from 100-year storm events. Residential and commercial structures within the floodplain would create a direct risk to people and property from flood waters. Other structures placed in the floodplain could raise the water surface elevation of the 100-year flood creating a risk to properties that were previously unaffected by floodwaters. Although each project may only create a small change in water surface elevation, cumulatively these small changes could result in a significant increase in the risk to people and structures from 100-year flood events. Federal regulations restrict development within the 100-year floodplains mapped by FEMA, however no floodplains have been mapped for Middle Martis Creek. Without mitigation, the proposed project would contribute to a significant cumulative impact to the 100-year floodplain environment within the Middle Truckee River Watershed. The potential floodplain impacts of the proposed project would be fully mitigated through implementation of Mitigation Measures 15-6a through 15-6f would require the delineation of the 100-year floodplain of Middle Martis Creek, would prevent encroachment into the floodplain that could result in an increase in the 100-year base	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
flood elevation, and would require that all buildings are located above 100-year flood flows. (Draft EIR, p. 15-32.)			
UTILITIES		S	
Impact 16-1: Increased demand for water supply (LS) Existing water demand from users within the NCSD service boundary is 538 afy and existing supply for NCSD users is 3,181 afy. Existing demand for groundwater from all groundwater users in the MVGB is 8,839 afy. Implementation of the proposed project would result in additional water demand from the MVGB of up to 325 afy by 2034. The additional water demand could be met by NCSD's existing water supplies and entitlements. Project-generated demand of 325 afy at buildout plus forecasted demand from future growth in the Martis Valley is estimated to be 18,955 afy in 2034. Extracting sufficient groundwater from the MVGB to meet forecasted demand would fall within the sustainable yield of the groundwater basin and within the 32,000 afy (including groundwater and surface water diversions) allowed to be extracted/diverted pursuant to TROA. Additionally, the water supplied to the proposed MVWPSP development would be filtered and treated either at the new well heads on the project site or at the NCSD water treatment plant to meet drinking water standards. (Draft EIR, pp. 16-18 to 16-22; Final EIR, p. 2-17; see also Master Response 8, Response to Comment LA1-3, IO13-1, IO41-74.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 16-2: Increased demand for wastewater collection and conveyance services (LS) The proposed project would be served by new facilities that would collect and convey wastewater from the West Parcel development area to the existing NCSD, TSD, and T-TSA collection systems. The NCSD golf course siphon lines have a capacity of 2,100 gpm and the 267 to TSD siphon lines have a total capacity of 2,550 gpm. The proposed project would generate peak wastewater flows of approximately 520 gpm. T-TSA has indicated that the TRI has capacity to accommodate the	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
addition of wastewater flows generated by the proposed project Therefore, existing capacity in the wastewater collection systems would be adequate to serve the proposed project. (Draft EIR, pp. 16-22 to 16-24; Final EIR, pp. 2-16 to 2-18; see also Response to Comments IO41-73, LA7-16 to LA7-18, and LA7-25 to LA7-28.)			
Impact 16-3: Increased demand for wastewater treatment services (LS) Wastewater generated by the project would be treated at the T-TSA wastewater treatment plant. The proposed project would generate wastewater flows of 0.29 mgd under ADWF conditions and 0.76 mgd under PWWF conditions. The applicant would be required to obtain approval from T-TSA before issuance of building permits. The capacity of the T-TSA wastewater treatment plant is 9.6 mgd and currently receives on average 6.41 mgd. The facility has sufficient capacity to treat wastewater generated by the proposed project and would not require construction of any additional facilities. (Draft EIR, p. 16-24.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 16-4: Result in inefficient and wasteful consumption of energy (LS) Implementation of the MVWPSP project would result in increased demand for electricity and natural gas. New infrastructure would connect new residential units, homeowner amenities, and commercial uses on the West Parcel development area to existing electrical and natural gas lines. Liberty Utilities and Southwest Gas have each indicated that it would be able to adequately serve the development at buildout. The proposed project's energy use would be similar to that of typical of residential and commercial projects, with energy consumption associated with use of lighting, heating, cooling, and appliances. In accordance with MVWPSP Policies ER-AQ4, ER-AQ5, ER-AQ6, ER-AQ7, ER-AQ9, ER-AQ13, ER-AQ15, and ER-AQ16, the proposed project would be designed to incorporate energy efficiency requirements and would include additional energy conservation and efficiency features.	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
(Draft EIR, pp. 16-25 to 16-26.)			
Impact 16-5: Increased demand for solid waste services (LS) Development of new residential and commercial uses under the MVWPSP would increase the demand for solid waste collection and disposal and construction of the project would temporarily generate construction waste. Construction activities would generate a total of 400 tons of solid waste over the course of the construction period. Solid waste generated at buildout of the MVWPSP would be approximately 7 tons of solid waste per day and a total of 2,561 tons per year. The Eastern Regional Landfill MRF is permitted to receive 800 tons of solid waste daily. The Lockwood Regional Landfill is permitted to accept solid waste at current and projected volumes for 150 years. The solid waste generated during construction and operation of the proposed project would not exceed the permitted capacity of the Eastern Regional Landfill MRF and Transfer Station, which would receive the waste for sorting and capture of recyclables, or Lockwood Regional Landfill, which would receive solid waste from the project for permanent disposal. (Draft EIR, pp 16-27 to 16-28.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 16-6: Increased demand for snow removal and storage (LS) Future development under the MVWPSP would be designed with predetermined areas of adequate size and space along roadways, parking areas, pathways, and other areas, such as the designated open space areas on the West Parcel to accommodate snow removal activities and provide adequate snow storage. (Draft EIR, p. 16-29.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 16-7: Cumulative increase in demand for water supply (LS) The geographic area considered for assessing cumulative demand for water supply is the Martis Valley Groundwater Basin and the NCSD service boundary. Cumulative plus project conditions for water supply are evaluated within the project-specific impact analysis in Impact 16-1. As indicated in Impact 16-1, the WSA prepared for the project	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
concludes that NCSD has sufficient and available water supplies to meet its current and planned future demands. Because WSAs require consideration of anticipated development over a 20-year period in addition to the project, the WSA considered cumulative development at buildout of the project in 2034. Future demand in 2034 for all users of the Martis Valley Groundwater Basin, including project demand, is 18,955 afy. The WSA identifies available supply of groundwater in the Martis Valley Groundwater Basin of 32,000 afy. These results indicate that the cumulative demand can be met from water supplied from the Martis Valley Groundwater Basin. When completed, the proposed onsite wells would be dedicated to NCSD and would be maintained and operated by NCSD. NCSD has sufficient water supply to meet projected demand in addition to that of the proposed project. (Draft EIR, p. 16-29; see also Master Response 8.)			
Cumulative Impact 16-8: Cumulative increase in demand for wastewater collection and conveyance services The geographic area that is considered for wastewater collection system includes the NCSD service boundary and the portion of the TSD wastewater collection lines extending between the NCSD outfall at Truckee Tahoe Airport Road and the T-TSA Truckee River Interceptor (TRI). For cumulative impacts on T-TSA wastewater conveyance, the area considered is the TRI between the TSD outfall pipeline and the wastewater treatment plant. As discussed under Impact 16-2, the West Parcel development area is currently outside the NCSD service boundary, but proposed to be annexed, and a new service contract between NCSD and TSD would be required following annexation. As mentioned under Impact 16-2, an independent evaluation of the capacity of the wastewater collection system and the potential impacts from MVWPSP development in combination with buildout in the NSCD service area was prepared for NCSD (NCSD 2015b). This analysis considered existing NCSD flows, flows from buildout of the NCSD service area, and the addition of flows from the proposed	**Cumulative Mitigation Measure 16-8a: Increase capacity of the NCSD wastewater collection and conveyance system** Prior to Placer County's environmental determination for each subsequent development entitlement, the project applicant shall coordinate with NCSD to determine the wastewater conveyance demand at buildout of each proposed development entitlement and provide the County with a copy of this coordination (e.g., will-serve letter or the equivalent). If the wastewater conveyance demand for an individual phase cannot be met with existing capacity in the NCSD collection and conveyance system, then prior to Improvement Plan approval, the applicant and NCSD shall develop plans for and construct improvements that would provide additional capacity in the NCSD system downstream from the point at which MVWPSP flows would enter the system. The wastewater conveyance and collection improvement plans developed by the project applicant and NCSD shall also identify the timing of such improvements, and that the capacity of the lines will be available when needed by project development. Prior to Improvement Plan approval, the project applicant shall provide evidence of payment to NCSD for fair share funding or show the construction of the	LS	**Finding:** Compliance with Mitigation Measure 16-8a and 16-8b, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by requiring increased capacity of the NCSD wastewater collection and conveyance system and by ensuring sufficient capacity in the TSD wastewater lines. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The Project would not make a considerable contribution to a cumulative impact related to T-TSA's sewer infrastructure (TRI). However, because future buildout in NCSD's and TSD's service areas would result in an exceedance of future wastewater conveyance system capacity, and because the exact timing for reaching capacity in the NCSD and TSD portions of the sewer infrastructure are unknown, the project would result in a considerable contribution to a cumulative impact related to wastewater collection and conveyance systems. Cumulative Mitigation Measure 16-8a and 16-8b, would require the project applicant to coordinate with NCSD to determine the wastewater conveyance demand for each development entitlement phase. If the demand for any individual phase exceeds the NCSD capacity, the applicant shall coordinate with NCSD to construct improvements to provide additional capacity, timed to meet the demand posed by development of the Project. In addition, the project applicant shall coordinate with TSD to determine the wastewater conveyance

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
project. While not assessed in the Sewer Capacity Analysis Technical Memorandum, the proposed 22,000 square feet of recreation/homeowner amenities for the MVWPWP would generate wastewater flows of approximately 6 gpm under ADWF conditions and approximately 15 gpm under PWWF conditions. The addition of sewer flows from recreation/homeowner amenities would represent less than 3 percent of the overall flows from development under the MVWPSP. The siphon lines and sizes recommended in the capacity analysis would not be affected by these small additional flows (Hunt, pers. comm., 2015). Under existing conditions, NCSD is able to operate either of the 8-inch or 12-inch siphon lines to satisfy system demand. Under NCSD buildout conditions, the remaining available capacity of the siphon lines under PWWF is 443 gpm. The PWWF at buildout of the NCSD service area would require use of both siphon lines run in parallel and operation of both pumps at the lift station for short periods of time. With the addition of project-generated wastewater to the NCSD wastewater collection system at manhole 237, in combination with flows from existing and NCSD buildout development, the golf course siphon section would not be able to meet the capacity requirements under PWWF conditions. Also, with the addition of MVWPSP flows, in combination with flows from existing and NCSD buildout development, the 267 to TSD siphon line section would essentially be at 100 percent capacity under PWWF conditions. The 267 lift station is also a key asset in the NCSD collection system. As equipped, the lift station has two 225 gpm pumps. Modeling simulations indicate that as flows increase with development, flows into the lift station will be up to 520 gpm, exceeding the capacity of a single pump. Cumulative projects that would contribute flows to the portion of the TSD system serving the project site include Joerger Ranch, North Highlands II, Northstar Mountain Master Plan, and Martis Camp. The TSD system at this point was designed and constructed to handle sewer flows from buildout of the NCSD service boundary, which includes Northstar Highlands II	improvements that would provide sufficient capacity for buildout of that phase to the satisfaction of NCSD. Improvements shall include: • With MVWPSP sewer flows into the golf course siphon at manhole 237 under Sewer Option 1, and Sewer Option 2, upsize approximately 6,450 linear feet of the existing 8-inch siphon line through the golf course to 16-inch, and upsize approximately 11,500 linear feet of the existing 8-inch 267-TSD siphon line to 16-inch; and • With MVWPSP sewer flows into the 267 to TSD siphon line downstream of the 267 Lift Station under Sewer Option 1 and Sewer Option 2, upsize approximately 11,500 linear feet of the existing 8-inch line to 16-inch; or • Under Sewer Option 3, construct a direct sewer line from the West Parcel development area, along SR 267, to the TSD connection manhole at Truckee Tahoe Airport Road. This option would run parallel to the existing system. **Cumulative Mitigation Measure 16-8b: Ensure sufficient capacity in TSD lines** Prior to the Placer County Subsequent Conformity Review Process environmental determination for each development entitlement following Specific Plan approval, the project applicant shall coordinate with TSD to determine the wastewater conveyance demand at buildout of each proposed development entitlement and provide the County with a copy of the coordination. If TSD finds that project-generated peak wastewater flows exceed the capacity of the TSD line between the NCSD outfall at Truckee-Tahoe Airport Road and the TRI, NCSD and TSD shall develop plans for and construct improvements that would allow for conveyance of buildout wastewater flows. The improvements shall be constructed to meet peak wet weather flows of 520 gpm, or flows determined by final design plans, in the sewer line from the NCSD outfall to the TRI. The plans shall identify the timing of the improvements, and that the capacity of the lines will be available when needed by project development. Prior to Improvement Plan approval, the project applicant shall provide evidence of payment to		demand for each development entitlement phase. If the demand for any individual phase exceeds the TSD capacity, TSD shall coordinate with NCSD to construct improvements to provide additional capacity, timed to meet the demand posed by development of the Project. The project applicant shall provide fair share funding for the improvements or construct the improvements necessary in coordination with the TSD and NCSD. This plan will reduce significant impacts to less than significant levels. (Draft EIR, pp. 16-29 through 16-32; Final EIR, pp. 2-19 to 2-23; see also Response to Comments IO41-73, LA7-29 to LA7-33 and LA7-35 to LA7-38.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
and Northstar Mountain Master Plan (Tresan, pers. comm., 2015). Preliminary results from modeling of the demand for wastewater conveyance from buildout conditions in this portion of the TSD system indicate that future development could result in some portions of the sewer lines reaching capacity during peak flows but would not result in an overflow. The TSD wastewater conveyance system in this area is currently able to serve existing wastewater flows during ADWF and PWWF. The preliminary results from modeling of project flows in addition to flows from buildout of other cumulative projects indicate that additional segments of the TSD system would reach capacity, and there could be overflow in some pipes. Although cumulative projects and the proposed project would be required to comply with terms and conditions of the applicable service contract, which would include, among other things, payment of one-time fees for connection to the TSD system, as well as regular user fees and surcharges in lieu of property taxes for ongoing operation and maintenance, this would be a significant cumulative impact. Because it is not known at exactly what point during development of the project when the TSD system would reach capacity, additional flows from the proposed project could be added to the TSD system when it is near or at capacity, resulting in overflows prior to buildout of the project. The project would make a considerable contribution to the cumulative impact on wastewater conveyance in the TSD system. The PDWF at buildout of the NCSD service area, the TSD service area served by the MVI, and MVWPSP is 2,743 gpm (Tresan, pers. comm., 2015c). The PWWF at buildout of the NCSD service area, the TSD service area served by the MVI, and MVWPSP is 3,842 gpm. Flows from buildout of the existing service area for the MVI and from the MVWPSP would result in approximately 5,500 linear feet of the MVI surcharging or overflowing. The existing agreement for conveyance via TSD infrastructure only allows for wastewater flows generated from development within the existing NCSD service boundary (TSD 2014). To provide wastewater collection and conveyance services to the MVWPSP, NCSD would enter	NCSD and TSD for fair share funding or show the construction of the improvements, to be determined in coordination with NCSD and TSD, which would provide sufficient capacity to the satisfaction of NCSD and TSD. Fair share funding or construction of the improvements by the project applicant shall also account for any additional permanent and/or temporary easements. Improvements shall include: • Providing onsite wastewater detention facilities, such as enlarged pipes, vaults, or tanks, such that conveyance can be timed to coincide with off-peak conditions when the TSD line has sufficient capacity; or • Replacing the existing TSD line with a larger sewer line that increases capacity to serve future demand for wastewater conveyance; or • Installing an additional line parallel to the existing TSD line that increases capacity to serve future demand for wastewater conveyance. The developer of any project within the MVWPSP area shall be required, as part of the Placer County Subsequent Conformity Review Process and/or tentative map approval process, to submit a will-serve letter from TSD prior to the issuance of any building permit. (Draft EIR, pp. 16-31 through 16-32; Final EIR, pp. 2-21 to 2-23; see also Response to Comments LA7-35 to LA7-38.)		

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
into a new contract with TSD to include collection and conveyance of wastewater from the West Parcel development area. The West Parcel development area is currently outside the NCSD service boundary, but proposed to be annexed, and The West Parcel development area is currently outside the NCSD service boundary, but proposed to annexed, and a new service contract between NCSD and TSD would be required following annexation. The proposed project would also be required to comply with terms and conditions of the new service contract between NCSD and TSD, which would include, among other things, payment of one-time fees for connection to the TSD system, as well as regular user fees and surcharges in lieu of property taxes for ongoing operation and maintenance. Under the service contract between NCSD and TSD for service to the project area, NCSD would collect these fees and transfer them to TSD. Based on TSD's capacity analysis, project-generated flows along with flows from other anticipated developments would exceed the capacity of the existing TSD MVI pipeline. Cumulative projects that would contribute flows that could affect the TRI below the TSD outfall include Joerger Ranch, North Highlands II, Northstar Mountain Master Plan, Martis Camp, Brockway Campground, Homewood Mountain Master Plan, and projects in Squaw Valley and Alpine Meadows. The population generated by the proposed project was planned for as part of the Martis Valley Community Plan (MVCP), which is considered and incorporated by reference into the Placer County General Plan. The project would result in a reduction in population size from that proposed in the MVCP. The TRI is designed to address buildout of its service area which includes cumulative projects located within the Town of Truckee and Placer County (Placer County 1994, Town of Truckee 2006). Additionally, T-TSA emergency overflow ponds located between Riverview Park and the Truckee River are designed to handle additional flows that may be experienced during peak periods and storm events (T-TSA 2009). Because there is adequate capacity within this segment of the TRI, and it was designed to meet buildout demand, this is a less than significant cumulative impact.			

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
In summary, the project would not make a considerable contribution to a cumulative impact related to T-TSA's sewer infrastructure (TRI). However, because future buildout in NCSD's and TSD's service areas would result in an exceedance of future wastewater conveyance system capacity, and because the exact timing for reaching capacity in the NCSD and TSD portions of the sewer infrastructure are unknown, the project would result in a considerable contribution to a cumulative impact related to wastewater collection and conveyance systems. (Draft EIR, pp. 16-29 to 16-31; Final EIR, pp. 2-19 to 2-21; see also Response to Comments IO41-73, and LA7-29 to LA7-33.)			
Cumulative Impact 16-9: Cumulative increase in demand for wastewater treatment services (LS) The geographic area that is considered for cumulative impacts on wastewater treatment services consists of the T-TSA service area. Currently, the wastewater treatment plant has adequate capacity to serve existing wastewater treatment demand. Cumulative projects that would contribute demand for wastewater treatment in the T-TSA wastewater treatment plant include Joerger Ranch, North Highlands II, Northstar Mountain Master Plan, Martis Camp, Homewood Mountain Master Plan, and projects in Squaw Valley and Alpine Meadows. The T-TSA wastewater treatment plant is designed to address buildout of its service area which includes cumulative projects located within the Town of Truckee and Placer County (Placer County 1994, Town of Truckee 2006). Additionally, TTSA emergency overflow ponds located between Riverview Park and the Truckee River are designed to hold additional flows until the treatment plant could process those flows (T-TSA 2009). Similar to wastewater conveyance, these cumulative projects are required to pay connection fees that are used to cover the operations and maintenance costs of these additional flows. The population generated by the proposed project was planned for as part of the Martis Valley Community Plan (MVCP), which is	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
considered and incorporated by reference into the Placer County General Plan. The project would actually result in a reduction in population size from that proposed in the MVCP. As described above, the T-TSA water treatment plant is designed to address buildout of its service area, which includes the proposed project and cumulative projects located within the Town of Truckee and Placer County. Because of this and the additional storage provided by T-TSA overflow ponds, there would be sufficient capacity in the T-TSA wastewater treatment plant to meet the wastewater treatment demand of future buildout. (Draft EIR, pp. 16-32 to 16-33.)			
Cumulative Impact 16-10: Cumulative inefficient and wasteful consumption of energy (LS) The geographic area considered for cumulative impacts related to energy use includes the service areas for Liberty Energy and Southwest Gas. These providers employ various programs and mechanisms to support provision of these services to new development; various utilities charge connection fees and re-coup costs of new infrastructure through standard billings for services. There is currently sufficient infrastructure and energy supply to support existing demand. Cumulative projects identified in Draft EIR Chapter 4, Table 4-2 that would be served by these energy providers include the Brockway Campground Project, Northstar Mountain Master Plan, Northstar Highlands Phase II, Joerger Ranch Specific Plan, Canyon Springs Subdivision, and buildout of Martis Camp. Through its established process to provide connections and natural gas supply to new development, Southwest Gas uses plans provided by the developer to determine if or when upgrades in the system would be required to meet demand (Echeverria, pers. comm., 2015). To ensure redundancy in its electricity system to customers in the Northstar, Kings Beach, and Truckee areas, Liberty Utilities will begin construction in summer 2015 on the 650 Electrical Line Upgrade Project, which will upgrade the system serving these areas to improve reliability and accommodate planned	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
growth, including the proposed project and other nearby similar projects listed above (Liberty Utilities 2015b). Additionally, these projects would contribute to increased energy demand; however, these projects would be required to implement energy efficiency measures in accordance with the Title 24 to reduce energy demand. For this reason and because Liberty Utilities and Southwest Gas have procedures to plan for system improvements to keep pace with projected demand, cumulative energy impacts would be less than significant. As described in Impact 16-4, the demand for energy from buildout of the proposed project would result in an increase in demand for energy, when combined with other cumulative projects, all of which are subject to Title 24 energy efficiency requirements, would result in a less-than-significant cumulative impact. Implementation of the proposed project would include a number of energy saving features required by MVWPSP Policies ER-AQ4, ER-AQ5, ER-AQ6, ER-AQ7, ER-AQ9, ER-AQ13, ER-AQ15, and ER-AQ16 that would result in additional reductions in energy use beyond those required by Title 24. The project's implementation of Mitigation Measures 12-2 and 13-2 would further ensure that non-renewable energy use during construction would not be wasteful, inefficient, or unnecessary by minimizing vehicle idling time and use of late model engines. (Draft EIR, p. 16-33.)			
Cumulative Impact 16-11: Cumulative increase in demand for solid waste services (LS) The geographic area considered for cumulative impacts related to energy use includes the service area for Tahoe Truckee Sierra Disposal. They currently have sufficient staffing and facilities, including capacity at the Eastern Regional Landfill MRF and Lockwood Landfill. The transfer station sorts out recyclable materials and ships the remaining solid waste to Lockwood Landfill. On average, the Eastern Regional Landfill MRF is operating at approximately 23 percent of permitted capacity. Operational waste from the proposed project would result in less than a four percent increase in daily waste received at the MRF. As	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
permitted, the life of the landfill is 150 years and has sufficient capacity to meet existing demand (Anderson, pers. comm., 2015). Other approved and foreseeable projects identified in Draft EIR Chapter 4, Table 4-2 that propose new residential, commercial, and recreation development, including the Brockway Campground Project, Northstar Mountain Master Plan, Northstar Highlands Phase II, Joerger Ranch Specific Plan, Canyon Springs Subdivision, and buildout of Martis Camp, would contribute to increased demand for solid waste services. Total capacity and life of the Eastern Regional Landfill MRF and Lockwood Landfill were planned to include demand for the Sierra-portion of Placer County and the Town of Truckee, including the cumulative projects. Additionally, these projects must meet waste reduction requirements set forth by AB 939 and AB 341. Consequently, solid waste demand from the cumulative projects is a less-than-significant cumulative impact. Additionally, these projects do not create the need for new or expanded facilities or infrastructure. As described under Impact 16-5, construction waste generated by the proposed project would account for approximately 0.01 percent of the total landfill capacity and operational waste generated by the proposed project would account for a 0.17 percent increase in daily waste received at Lockwood Landfill. The proposed project's operational solid waste would represent a 3.7 percent increase in daily waste received at the Eastern Regional Landfill MRF. Additionally, the development proposed by the MVWPSP was planned for in the Martis Valley Community Plan. The combined demand for solid waste generated by the proposed project and other cumulative projects would result in a substantial increase in solid waste demand; however, the Eastern Regional Landfill MRF and Lockwood Landfill have sufficient capacity available to meet the demands of these planned projects. Additionally, solid waste generation would be reduced by State solid waste reduction requirements. For these reasons, the proposed project when combined with other cumulative projects result in a less-than-significant cumulative impact. The project-level analysis to determine the solid waste generated by the			

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
proposed project assumed full occupancy; however, the project is estimated to contain only 20 percent permanent residents and 80 percent second-home residents. Consequently, the estimated solid waste demand is considered to be a conservative estimate and the actual solid waste demand would be much lower than identified in Impact 16-5. Additionally, the analysis does not take into account state requirements to reduce solid waste, which would further reduce the amount of solid waste generated by the project. For these reasons, the proposed project's contribution to a cumulative impact on solid waste services would be reduced. (Draft EIR, p. 16-34.)			
Cumulative Impact 16-12: Cumulative increase in demand for snow removal and storage (LS) The geographic area considered for cumulative impacts on increased need for snow removal and storage would be limited to the West Parcel. As described in Impact 16-6, snow storage areas would be incorporated into the design and construction of the proposed project and the project site would be annexed into the NCSD service boundaries, resulting in NCSD providing road clearing and snow removal on the project site. (Draft EIR, p. 16-34.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
PUBLIC SERVICE AND RECREATION			
Impact 17-1: Impacts on existing recreation facilities (LS) The MVWPSP is located in an area containing recreation facilities, such as trails, that provide year-round opportunities for hiking, mountain biking, cross country skiing, snowshoeing, and snowmobiling. Important recreation trails near the MVWPSP project site include the Tahoe Rim Trail, Fibreboard Freeway, and Northstar trails. Implementation of the MVWPSP would not interfere with use of these recreation facilities. The proposed project would provide 14 miles of multi-use recreation trails on the West Parcel, some of which could connect to the nearby regional trail system. Additionally, MVWPSP proposes conservation of the East Parcel, which would connect 50,000 acres of contiguous undeveloped forested land	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
east of SR 267 through the Mount Rose wilderness. Implementation of the MVWPSP would increase the use of existing trails and recreation facilities by introducing new residents and visitors to the West Parcel. The East Parcel contains approximately 40 miles of existing informal and unauthorized user-created trails that are assumed to be retained. If the East Parcel is acquired by a conservancy, the new owner would decide whether to maintain existing trails and/or create new trails. However, it is not known at this time whether the East Parcel would be placed under a conservation easement or acquired by a conservancy and what, if any improvements, a conservancy might implement. Any formalized or expanded use is not proposed as part of the project, and this EIR assumes that no changes are made to East Parcel trails or other elements, and that the existing level of use of these trails will remain at current levels. Because the project would result in a permanent and seasonal population increase, it would result in an increase in use of existing recreation resources; however, because there are ample recreation resources available and the project would include additional recreation opportunities, no substantial physical deterioration of existing recreation resources and facilities would occur. (Draft EIR, pp. 17-13 to 17-15; see also Response to Comment IO3-2, IO31-38, IO45-2 to 5.)			
Impact 17-2: Increased demand for parks and recreation facilities (LS) The MVWPSP would include recreational facilities to serve future residents of the project site, including open space areas and recreation amenities that could include a swimming pool, tennis courts, basketball court, fitness center, and other amenities. Additionally, the MVWPSP proposes approximately 14 miles of multi-use trails throughout the West Parcel that would connect to regional trail networks. The physical effects of constructing these facilities (e.g., tree removal, site preparation, excavation, construction noise, generation of fugitive dust), are substantially similar to those of the residential and commercial buildings and are addressed respective chapters of this EIR. (e.g., Chapter 7, “Biological Resources,” Chapter 9, “Visual Resources,” Chapter 13,	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
"Noise," Chapter 15, "Hydrology and Water Quality.") The MVWPSP would provide recreational facilities that would meet or exceed the Placer County General Plan recreational facilities standards and as such, would not have a substantial adverse impact on existing nearby recreational facilities such that physical deterioration of those facilities would occur. (Draft EIR, pp. 17-15 to 17-16; see also Response to Comment IO45-2 to 5.)			
Impact 17-3: Increased demand for fire protection and emergency medical services (PS) The MVWPSP would include development that would increase demand for fire protection and emergency medical services. The West Parcel development area would be annexed into, and fire protection services would be provided by, Northstar Community Services District (NCSD) along with the California Department of Forestry and Fire Protection (CALFIRE). The Northstar Fire Department (NFD), which is part of NCSD, currently maintains a minimum daily staff of four firefighters. Based on project size, population, and distance from the fire stations, project development would result in the need for an additional one to three firefighters over the course of project construction and occupancy to maintain adequate levels of fire protection. Implementation of the proposed project would not result in physical impacts because of the need for new or physically altered facilities. However, the demand from the proposed project could adversely affect response times and NFD's ability to respond to multiple emergency calls, which would be an impact on public health and safety. (Draft EIR, pp. 17-16 to 17-18; see also Master Response 9, Response to Comment IO41-71.)	**Mitigation Measure 17-3: Provide additional fire protection staffing** Before recordation of the Large Lot Final Map or the initial Small Lot Final Map (or any commercial development), the project applicant shall develop and implement a funding plan that would sufficiently supplement tax revenue from the MVWPSP to add fire protections staff. Such funding shall remain in place until the funding stream from property tax revenue is sufficient to maintain fire protection standards of service. If this does not occur, an Assessment District would be necessary. In consultation with NFD, the fire protection staffing increases shall be tied to project occupancy such that level of service is maintained as level of risk is increased as the development is built out. The funding plan would provide for revenue to initially employ one additional full-time firefighter and then, over time as development occurs, to add another additional full-time firefighter to properly respond to a serious building fire that could occur in the vicinity of 5 miles from the fire station. The funding plan shall include the following framework for the trigger points for increased staffing. The trigger points for adding daily staffing above the current minimum of four should be: 1. With the certificate of occupancy of the first dwelling unit or any of the commercial space, the project developer shall provide the project's fair share contribution to overtime funds to the Northstar Fire Department to provide a minimum of five firefighters on duty 24/7/365. 2. With the certificate of occupancy of the 100th dwelling unit, or 50 percent of the commercial	LS	**Finding:** Compliance with Mitigation Measure 17-3, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by providing additional fire protection staffing. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Development of the Project would increase demand for fire protection and emergency medical services. NCSD and CALFIRE would provide fire protection and emergency medical services to the project area. Based on project estimates, an additional one to three full time fire protection staff members will be needed over the course of project development. Mitigation Measure 17-3 requires the project applicant to develop and implement a funding plant that would sufficiently supplement tax revenue from the MVWPSP to add the needed fire protection staff. This plan will reduce the potential impacts to less than significant levels. (Draft EIR, pp. 17-16 to 17-19; see also Master Response 9, Response to Comment IO41-71.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	space, the project developer shall provide to the Department the added revenue to add two permanent full-time firefighters, one each to two shifts, raising the minimum staffing to six career firefighters 24/7/365. At this point, all three duty shifts will have six firefighters each. 3. With the certificate of occupancy of the 200th dwelling unit, or 75 percent of the commercial space, the project developer shall pay the project's fair share contribution to ensure the Department has the overtime funds to maintain a minimum of six career firefighters on duty 24/7/365. 4. With the certificate of occupancy of the 300th dwelling unit, or 100 percent of the commercial space, the project developer shall pay the project's fair share contribution to ensure that the department has the funds to add three additional firefighters, one per duty platoon, raising each to seven firefighters. (Draft EIR, pp. 17-18 to 17-19.)		
Impact 17-4: Increased demand for law enforcement services (LS) The MVWPSP would add new residents in the Martis Valley area. Based on data from other developments in the vicinity, the project is expected to generate approximately 380 fulltime, permanent residents in 20 percent of the dwelling units; the remainder would be second homes, with periodic occupancy. Based on consultation with the Placer County Sheriff's Department, the project would not result in the need for additional or expanded law enforcement service facilities and would not result in decreased law enforcement service levels. (Draft EIR, pp. 17-19 to 17-20.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 17-5: Increased demand for public schools (LS) At buildout, the MVWPSP would add 760 new residences in the Martis Valley region. As described in Chapter 6, "Population, Employment, and Housing," it is anticipated that the MVWPSP would have approximately 20 percent permanent residents and approximately	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
80 percent transient/seasonal visitors. This would result in an estimated permanent resident population of approximately 380 persons and a student yield of approximately 49 students. (Draft EIR, pp. 17-20 to to 17-21.)			
Cumulative Impact 17-6: Cumulative demand for recreation facilities and opportunities (LS) The geographic area for cumulative recreation impacts includes the southeastern portion of the Town of Truckee, Martis Valley, and the north shore of Lake Tahoe extending from Kings Beach to Tahoe City. Recreation demand in the Truckee-Tahoe region is met with a wide variety and amount of recreational facilities and opportunities. Additionally, a number of the cumulative projects identified in Draft EIR Chapter 4, Table 4-2, including the Martis Valley Trail, Northstar Mountain Master Plan, Northstar at Tahoe Ski Trail Widening, Truckee River Corridor Access Plan, Dollar Creek Shared-Use Trail, and Brockway Campground would provide new recreation opportunities, improve public access to recreation, and enhance the potential for recreational experiences in the region. The Martis Valley area and the north shore of Lake Tahoe near Kings Beach and Tahoe Vista contain thousands of acres of public lands and lands in permanent conservation that provide open space accessible to the public for recreation activities that include hiking, mountain biking, skiing, snowshoeing, snowmobiling, and wildlife viewing. These resources include, among others, the Tahoe Rim Trail, Burton Creek State Recreation Area, Tahoe National Forest, Lake Tahoe Basin Management Unit, Fibreboard Freeway, and Martis Creek Lake Recreation Area. The Northstar resort area also includes a trail system and ski resort. These recreation resources are monitored by their respective management entities, and maintenance is conducted as necessary. These resources provide ample opportunities for recreating to meet the existing and future demand. Cumulative projects that would increase the demand for recreation resources include	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
Brockway Campground, Truckee Railyard Master Plan, Pollard Station, Joerger Ranch Specific Plan, Canyon Springs Subdivision, Martis Camp, Northstar Highlands Phase II, Village at Squaw Valley Specific Plan, Squaw Valley Ranch Estates, PlumpJack Squaw Valley Inn, and Alpine Sierra Subdivision. Because many of these projects are proposed specifically to improve access to recreation and the recreation experience (Brockway Campground, ski resort accommodations), are required to comply with local agency requirements for provision of active and passive recreation (e.g., Town of Truckee General Plan Policy COS-P8.1), and are in a location with abundant existing and proposed recreation opportunities and facilities, the cumulative recreation impact would be less than significant. Cumulative projects that would increase the demand for recreation resources include Brockway Campground, Truckee Railyard Master Plan, Pollard Station, Joerger Ranch Specific Plan, Canyon Springs Subdivision, Martis Camp, Northstar Highlands Phase II, Village at Squaw Valley Specific Plan, Squaw Valley Ranch Estates, PlumpJack Squaw Valley Inn, and Alpine Sierra Subdivision. Because many of these projects are proposed specifically to improve access to recreation and the recreation experience (Brockway Campground, ski resort accommodations), are required to comply with local agency requirements for provision of active and passive recreation (e.g., Town of Truckee General Plan Policy COS-P8.1), and are in a location with abundant existing and proposed recreation opportunities and facilities, the cumulative recreation impact would be less than significant. As described above, implementation of the MVWPSP would result in increased permanent and seasonal population, and would thereby increase the demand for recreation opportunities and facilities. The MVWPSP project itself includes policies that identify new recreation facilities, such as trails, to be constructed on the West Parcel and provide measures to address visual quality and noise effects (MVWPSP Policies CP-5, OS-1 through OS-10, ER-SR4, ER-SR5, ER-N2, and ER-N3). The project would include recreational facilities to serve future residents of the project			

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
site, including open space areas and recreation amenities that could include a swimming pool, tennis courts, basketball court, fitness center, and other amenities. Because the project would provide substantial onsite recreation opportunities and because ample recreation resources are available in the vicinity, the project would not contribute to substantial cumulative demand for recreation resources, nor would it contribute to substantial physical deterioration of existing recreation facilities. (Draft EIR, pp. 17-21 to 17-22.)			
Cumulative Impact 17-7: Cumulative demand for fire protection and emergency medical services (LS) The geographic area for cumulative effects related to fire protection and emergency medical services includes the area within the Northstar Community Services District service area, which includes the Northstar Resort area and is served by the Northstar Fire Department (NFD). NFD has two stations, Station 31 located on Northstar Drive and Station 32 located on Highlands View Road. Fire protection and emergency medical services for the MVWPSP project would be provided by NFD Station 31. Currently, NFD has sufficient staffing and facilities to address existing demand for fire protection and emergency medical services. Cumulative projects that would increase demand for fire protection and emergency medical services include Northstar Highlands Phase II and Northstar Mountain Master Plan. NFD has indicated that Northstar's projected residential and commercial development would increase demand for emergency services by NFD (NFD n.d.). However, the Northstar Highlands Phase II project is within an established Community Facilities District (CFD), which provided funding for Station 32. Additionally, the NFD has a fire mitigation fee program under which new development is required to pay for its fair share cost of planned capital improvement needs. With the tax revenue generated by Northstar development, funding through Highlands CFD, and revenue from the fire mitigation fee program, sufficient funding is available to provide the future capital improvements necessary to maintain services	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
levels. As discussed above, the project would provide additional funding in accordance with the NCSD fire mitigation fee program, and in accordance with MVCP Policy 6.H.3, and NCSD would receive additional funding from tax revenue generated by the MVWPSP development to support adequate fire protection services within the NCSD boundary. The fire mitigation fee collection program is used for infrastructure upgrades, which includes future plans for expansion of the Northstar Drive Station (Station 31) and one additional engine that would be required to maintain adequate response times and accommodate projected new development through buildout of the existing NCSD service boundary (NFD n.d.). The NFD 2014-2015 Capital Facilities Plan identifies a need for expansion of the Northstar Drive Station to accommodate buildout of the existing service boundary. The fire mitigation fee collection program may not be used for staffing (Shadowens, pers. comm., 2015a). As identified in the NFD Capital Facilities Plan, the fire mitigation fee program would fund expansion and remodel of Station 31 and acquisition of an additional engine for the District. The Capital Facilities Plan does not identify the timing at which the physical changes to Station 31 would be needed, but such station expansion would likely involve minor grading, site preparation, and construction that would result in impacts typical of such activities, including short-term increases in noise levels, generation of fugitive dust and other construction emissions, and construction vehicles and equipment on local roadways. At such time such expansion and remodeling of Station 31 is proposed, NCSD would evaluate the project in accordance with CEQA and implement measures to address potential adverse physical effects on the environment. It is reasonable to expect that construction would be short-term, localized, and would not result in significant cumulative construction-related impacts. The MVWPSP would be subject to the NFD fire mitigation fee program and defensible space requirements. An FPP prepared to the satisfaction of Placer County and NFD would be required, as would demonstration of sufficient water supply to provide reasonable protection			

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
from wildfire without disruption of domestic water use. The proposed project would also implement other design features, including two emergency vehicle access routes, which would promote fire and public safety. No additional or expanded facilities would be needed to meet the demand for the fire and emergency services. Because the project has the potential to increase demand for emergency services such that response times reach unacceptable levels, Impact 17-3 concludes that, without mitigation, buildout of the MVWPSP would result in a significant impact on fire and emergency response services. In combination with the other cumulative projects served by NFD (i.e., Northstar Highlands Phase II and Northstar Mountain Master Plan), this would result in a cumulative impact on public health and safety. The proposed project would implement Mitigation Measure 17-3 that would provide funding for adequate fire protection staffing to enable adequate response to fire emergencies and maintain public health and safety. (Draft EIR, pp. 17-22 to 17-23; see also Response to Comment IO41-71.)			
Cumulative Impact 17-8: Cumulative demand for law enforcement services The geographic area for cumulative impacts on law enforcement services is the area served by the Placer County Sheriff substation in Tahoe City. Other cumulative projects that could affect law enforcement services include the Northstar Highlands, Village at Squaw Valley Specific Plan, Squaw Valley Ranch Estates, Plumpjack Squaw Valley Inn, Alpine Sierra Subdivision, and Homewood Mountain Resort Ski Area Master Plan. These projects would primarily add hotels, vacation rentals, and second homes as well as some commercial and recreation amenities, resulting in incremental increases in the permanent and visitor population. As described in Impact 17-4, the proposed project would result in a small increase of permanent full-time residents. During holidays and other periods of high tourist visitation (e.g., ski season, summer weekends), the proposed project population would be expected to increase, which, in combination with other nearby similar development, could affect	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
Placer County Sheriff service ratios and response times. However, because it would be periodic, in a manner consistent with the periodic peak visitation that already occurs in the region, it would not be anticipated to result in physical deterioration of existing facilities or require additional facilities. Additional staff on duty during these peak periods are accommodated in existing facilities and with existing equipment. The proposed project would be required to obtain a will-serve letter from the Placer County Sheriff's Department and pay Placer County fees that would cover the project's public safety costs. The proposed project, in combination with other cumulative development, would not result in the need for new facilities or alterations to existing facilities. (Draft EIR, p. 17-23.)			
Cumulative Impact 17-9: Cumulative demand for school services The geographic area for cumulative impacts on schools is the school enrollment boundaries for Truckee Elementary School, Alder Creek Middle School, and Truckee High School. The cumulative projects in Draft EIR Chapter 4, Table 4-2 that could contribute to a cumulative impacts on schools that would serve the MVWPSP development include Joerger Ranch Specific Plan on Truckee Elementary School, and Joerger Ranch Specific Plan and Canyon Springs Subdivision on Alder Creek Middle School and Truckee High School. All three schools have available capacity to serve these projects. The project developers for these projects would be required to pay development fees for schools in proportion to the number of new students estimated to be generated by each project. (Draft EIR, pp. 17-23 to 17-24.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
HAZARDS AND HAZARDOUS MATERIALS			
Impact 18-1: Expose people or the environment to hazards due to the routine use, storage, or transport of hazardous materials or from accidental release or upset (LS) Construction and operation of residential and commercial facilities pursuant to the MVWPSP, as well as the continuance of timber harvest and fuels management activities, would involve the use, storage, and transport of	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
hazardous materials. All such hazardous materials and activities would be typical for such uses, and would occur in compliance with local, state, and federal regulations, which would minimize the potential for upset or accident conditions. (Draft EIR, pp. 18-14 to 18-16.)			
Impact 18-2: Exposure to recognized environmental conditions (PS) The MVWPSP project site is undeveloped forested lands and the potential to encounter hazardous materials contaminated soils associated with mining, logging, and motor vehicle use is low. However, the MVWPSP project site is located in an area with a moderate potential for naturally occurring radon gas, exposure to which has the potential to cause lung cancer. In addition, aerially deposited lead could be present on and near the shoulders of SR 267. Through construction of the proposed project, it is possible that previously unidentified contaminants could be disturbed or encountered. (Draft EIR, pp. 18-16 to 18-17.)	**Mitigation Measure 18-2a: Conduct surveys for aerially deposited lead** Prior to Improvement Plan approval (or issuance of an Encroachment Permit from Caltrans for construction within the SR 267 right-of-way), surface and shallow soils (up to two feet below ground surface), shall be surveyed for lead contamination. All sampling shall be conducted consistent with applicable Caltrans requirements. If aerially deposited lead contaminated soil is discovered, with total lead measuring greater than 1,000 mg/kg or soluble lead measuring greater than 5.0 mg/l, survey recommendations on soil management shall follow Caltrans protocol and shall be incorporated into the construction hazardous materials management plan described in Mitigation Measure 18-2c. **Mitigation Measure 18-2b: Conduct investigation and implement radon resistant construction techniques** Prior to the occupancy of residential units, the applicant or construction manager shall retain a licensed radon contractor to determine if radon is detected beyond the 4 pCi/L threshold. If the amount of radon exceeds the established threshold, the applicant shall retain a licensed radon contractor to reduce the radon in the affected residences to below the established threshold. Methods include, but are not limited to, the soil suction radon reduction system, which entails the installation of a vent pipe system and fan that pull radon from beneath the house and vent it to the outside. The radon contractor shall develop clear instructions for proper maintenance of the radon monitoring systems that would be installed in each residence, as well as the radon monitoring and reduction system, if required. The maintenance instructions shall be included in the proposed project's covenants, conditions, and restrictions (CC&Rs). The property disclosure statements	LS	**Finding:** Compliance with Mitigation Measure 18-2a, 18-2b, and 18-2c, which have been required or incorporated into the project, will reduce this impact to a less than significant level, by surveying for aerially deposited lead, implement radon resistant construction techniques and investigate for radon prior to occupancy, and prepare and implement a construction hazardous materials management plan. The Board of Supervisors hereby directs that these mitigation measures be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** The potential for exposure to hazardous materials contaminated soils associated with mining, logging, and motor vehicle use is low, but there is a potential for exposure to naturally occurring radon gas, and aerially deposited lead could be present on and near the shoulders of SR 267. Mitigation Measure 18-2a, 18-2b, and 18-2c requires the project applicant to survey the surface and shallow soils for lead contamination. If lead contamination greater than 1.00 mg/kg or soluble lead greater than 5.0 mg/l is discovered then soil management per Caltrans protocol shall be incorporated into the construction hazardous materials management plan. Prior to occupancy of residential units, the applicant shall measure for radon gas in concentrations higher than 4 pCi/L, if such levels are detected, the radon must be reduced below that threshold. Radon monitoring systems must be put in place and maintained as well. Lastly, the applicant shall include a construction hazardous materials management plan in any improvement plans, to be approved by the Placer County Environmental Health and Protection Services. The plan should cover worker safety as well as procedure for dealing with the discovery of contaminated soil or water. These measures will reduce potentially significant impacts to less than significant levels. (Draft EIR, pp. 18-16 to 18-19.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
	shall indicate that the site is within an area with a moderate potential for indoor radon levels. **Mitigation Measure 18-2c: Prepare and implement a construction hazardous materials management plan** Improvement plans shall include a construction hazardous materials management plan to be prepared, reviewed, and approved by Placer County Environmental Health and Protection Services. The management plan shall include measures to reduce potential hazards to workers, the public, and the environment associated with use of hazardous materials, exposure to potentially contaminated soil, and blasting activities during project construction. The management plan shall include provisions for agency notification, managing impacted materials, sampling and analytical requirements and disposal procedures. The Plan shall cover the following: • A hazardous materials contingency plan that describes the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction. The contingency plan shall describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials. The plan shall include measures to protect worker safety if signs of contamination are encountered (e.g., stopping work in the vicinity of the potential contamination), identify sampling and analysis protocols for various substances that might be encountered (e.g., volatile organic compounds, hydrocarbons, heavy metals), and list required regulatory agency contacts if contamination is found. The contingency plan shall include recommendations on soil management in the event that ADL is discovered in the SR 267 right-of-way. The plan shall also identify legal and regulatory processes and thresholds for cleanup of contamination. • The project applicant shall retain the services of a qualified environmental contractor to prepare the contingency plan. • The plan, and obligations to abide by and		

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	implement the plan, shall be incorporated into the construction and contract specifications for the project. (Draft EIR, 18-17 to 18-19.)		
Impact 18-3: Interfere with an emergency evacuation plan (LS) Construction of the proposed project would occur in phases and would involve truck traffic and temporary lane/shoulder closures in work zones that could result in temporary and intermittent traffic congestion on SR 267 and local roadways. Although construction would result in additional vehicles, trucks, and equipment on local roadways, it would be temporary and not extensive enough at any one time to result in the obstruction of an evacuation route or impair implementation of an emergency response or evacuation plan. Construction of the whole project would occur in smaller increments over a buildout period of approximately 20 years. Any roadway constraint or construction-related congestion would be easily removed or cleared in the event of an emergency. As part of project operation, adequate emergency access routes to and from the West Parcel development area would be established. Under existing-plus-project conditions at buildout, operation-related trips would represent an incremental increase in existing traffic volumes, but would not be great enough to substantially affect emergency response plans (see Chapter 10, "Transportation and Circulation," for further discussion of trip generation and traffic flow expected under buildout of the MVWPSP). Because the project would include two emergency access points in addition to the primary access road, adequate emergency ingress or egress would be provided. (Draft EIR, pp. 18-19 to 18-20; see also Master Response 9, Response to Comment IO41-67 to 70.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Impact 18-4: Expose people or structures to wildland fire hazards (PS) Implementation of the MVWPSP would expose people and structures to an area with high to very high risk of wildfire. Adherence to International Building Code standards for fire prevention during construction, incorporation of	**Mitigation Measure 18-4: Provide additional fire protection staffing** Implement Mitigation Measure 17-3 (see Chapter 17, "Public Services and Recreation"), which requires the project proponent to develop a mitigation plan to provide funding to supplement the projected fire mitigation fees and	LS	**Finding:** Compliance with Mitigation Measure 18-4, which has been required or incorporated into the project, will reduce this impact to a less than significant level, by providing addition fire protection staffing. The Board of Supervisors hereby directs that this mitigation measure be adopted. The Board of Supervisors, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR.

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
fire resistant building materials, defensible space, and compliance with local regulations would reduce the wildland fire threat to workers and residents. (Draft EIR, pp. 18-20 to 18-21; see also Master Response 9, Response to Comment IO41-66 and 69.)	property taxes generated by the MVWPSP. The additional funding would support the addition of staffing to properly handle a serious building fire occurring within five miles of NFD Station 31. The mitigation plan includes trigger points for the increased staffing. Alternatively, the mitigation measure states that if a mitigation plan is not developed then a small Assessment District would be necessary to achieve the same objective. (Draft EIR, p. 18-21.)		**Explanation/Facts in Support of Finding:** Development of the Project would increase demand for fire protection and emergency medical services. NCSD and CALFIRE would provide fire protection and emergency medical services to the project area. Based on project estimates, an additional one to three full time fire protection staff members will be needed over the course of project development. Mitigation Measure 17-3 requires the project applicant to develop and implement a funding plant that would sufficiently supplement tax revenue from the MVWPSP to add the needed fire protection staff. This plan will reduce the potential impacts to less than significant levels. (Draft EIR, pp. 17-16 to 17-19, and 18-21; see also Master Response 9, Response to Comment IO41-66 and 69.)
Cumulative Impact 18-5: Cumulative exposure of people or the environment to hazards due to the routine use, storage, or transport of hazardous materials or from accidental release or upset (LS) Although some hazardous materials releases can cover a large area and interact with other releases (e.g., atmospheric contamination, contamination of groundwater aquifers), incidents of hazardous materials contamination are more typically isolated to a small geographic area. These relatively isolated areas of contamination typically do not combine in a cumulative manner with other sites of hazardous materials contamination. On the project site and in its vicinity, there are no identified incidents of widespread hazardous materials contamination with different sources of contamination interacting on a cumulative basis. Future projects that would include construction activities and add new residences, commercial uses, and infrastructure, similar to those identified for the proposed project (see Draft EIR Chapter 4, Table 4-2), may use, store, and generate hazardous materials. However, these projects would be subject to existing federal, state, and local hazardous materials regulations, limiting the potential for releases and contamination and requiring clean-up when such events occurred. Given these conditions, there would not be a significant cumulative impact related to hazardous materials. The proposed project would result in the transport, storage, and use of hazardous materials as part of the construction and	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
operation of the proposed project. The proposed project would be required to comply with existing federal, state, and local hazardous materials regulations would apply, limiting the potential for releases and contamination and requiring clean-up when releases/contamination do occur. Also, as described above, interactions among multiple hazardous materials releases on a cumulative basis often require close proximity between the releases. In addition, the potential for the proposed project to expose people or the environment to hazardous materials would be reduced through proper safety precautions and compliance with applicable regulations as described in Impact 18-1. (Draft EIR, p. 18-22.)			
Cumulative Impact 18-6: Cumulative exposure to recognized environmental conditions (LS) The geographic area for cumulative impacts related to exposure to recognized environmental conditions would be limited to the West Parcel and areas immediately adjacent to the West Parcel. There are no identified incidents of widespread hazardous materials contamination with different sources of contamination on the project site or in its vicinity that would combine to create a cumulative impact. While Impact 18-2 identifies a potentially significant impact related to exposure to RECs or encountering previously unknown contaminants onsite, the impact associated with encountering onsite RECs or unknown contaminants is site-specific and would be limited to the West Parcel. There are no nearby similar conditions that would interact with conditions on the West Parcel. Consequently, there would be no cumulative impact related to exposure to recognized environmental conditions. The proposed project's potentially significant project-level impacts related to recognized environmental conditions would be reduced with implementation of Mitigation Measures 18-2a, 18-2b, and 18-2c. (Draft EIR, p. 18-22.)	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 18-7: Cumulative interference with an emergency evacuation	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002;

ENVIRONMENTAL IMPACT (SIGNIFICANCE FINDING BEFORE MITIGATION)	MITIGATION MEASURES	SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
plan (LS) The geographic area for cumulative impacts related to emergency evacuation would be the area between the North Shore of Lake Tahoe near Kings Beach to the southeastern portion of the Town of Truckee. Roadways identified in the Placer Operational Area East Side Emergency Evacuation Plan to be used as evacuation routes include SR 28, SR 267, and I-80. Evacuation centers are identified in the Town of Truckee and in Kings Beach. In the event of an emergency that would require evacuation from this area, evacuees could be directed to Truckee or Kings Beach. Cumulative projects in Draft EIR Chapter 4, Table 4-2 that would also be subject to emergency evacuation plans in the project vicinity include Northstar Highlands, Northstar Mountain Master Plan, Joerger Ranch Specific Plan, and Brockway Campground. In the event of an emergency, evacuation from these areas would occur via local roads to SR 267. From there, evacuees could be routed to evacuation centers located to the north or south ends of SR 267. While conditions on local roadways and SR 267 during an emergency evacuation could be congested, no known element of the proposed project or cumulative projects would prevent or impede evacuation, or result in physical interference with an evacuation plan such that evacuation could not occur. The cumulative impact with regard to emergency evacuation would be less than significant. The proposed project would include a primary access road, and a primary and secondary EVA, providing sufficient egress in the event of an emergency evacuation. (Draft EIR, p. 18-23; see also Master Response 9, Response to Comment IO41-67 to 70.)			CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)
Cumulative Impact 18-8: Cumulative exposure of people or structures to wildland fire hazards (LS) The geographic area for cumulative impacts related to wildland fire hazards encompasses the southeastern portion of the Town of Truckee, the Martis Valley, and the area around the North Shore of Lake Tahoe. The MVWPSP project site is within a high to very high fire hazard area. Past fires in the region have resulted in loss of life, significant	No mitigation is required.	LS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
losses of property, and substantial damage to habitat and environmental resources. Historic fire suppression and other forest land management practices have allowed fuels to accumulate in many areas, contributing to the severity of wildfires when they do occur. Additionally, past development in the forested landscape has increased the risk to life and property when fires do occur, and increased the potential for ignition of wildland fires through increased human presence and activity. Future related cumulative projects will continue this trend to varying degrees, including Joerger Ranch Specific Plan, Martis Camp, Martis Valley Trail, Northstar Mountain Master Plan, Northstar Highlands Phase II, and Caltrans' Highway Improvement Projects. Past and future fuels management projects serve to reduce wildland fire risk, including the fuels management activities on the MVWPSP project site and on adjacent LTBMU lands, NCSD lands, and the Carnelian and Incline Fuels Reduction and Healthy Forest Restoration Projects. Although developments have placed additional structures and people within a fire hazard zone, the projects have also extended water service, roadways, and fire clearance measures that allow for improved wildland fire response in the region. In addition, there are CWPPs on neighboring lands, including the Town of Truckee in Nevada County and Northstar, which direct the implementation of wildfire protection measures such as defensible space. All habitable structures that can be used as residential space are also assessed a SRA Fire Prevention Fee by the State, which funds State efforts at fire prevention. The combination of these cumulative projects, including projects that would manage fuels and reduce wildland fire risk, would result in a less-than-significant cumulative impact related to exposure of people and structures to wildland fires. The proposed project would result in additional development in a high to very high fire hazard area, which could increase the risk to life and property where fires do occur and increase the potential for ignition of wildland fires through increased human presence and activity. However, similar to other nearby projects, the proposed project would also comply with fire protection regulations and practices, contribute			

Environmental Impact (Significance Finding Before Mitigation)	Mitigation Measures	Significance After Mitigation	Findings of Fact
to the NCSD fire mitigation fee program, develop and implement a FPP, pay the SRA Fire Prevention Fee, and implement Mitigation Measure 18-4, which provides for funding additional fire protection staffing to reduce the potential exposure to wildfire hazards. Therefore, with mitigation the cumulative condition related to wildland fire hazard due to the combination of effects from the proposed project with past, present, and reasonably foreseeable future projects is less than significant. As identified in Impact 18-4, the proposed project would result in a potentially significant impact related to wildland fire hazards by creating additional demand for fire protection services that could be limited when NFD has to respond to multiple emergencies. Longer response times could result in larger fires, which could require more firefighting resources. The MVWPSP proposes construction of residences, commercial uses, and utilities infrastructure and facilities in accordance with fire protection regulations and practices including the fire mitigation fee collection program for new development, to minimize the opportunity for ignition, provide defensible space around structures, and help maintain adequate response times by the NFD through the project's contributions to the fire mitigation fee collection program. Additionally, the West Parcel development area would be subject to a FPP prepared for the proposed project and would be annexed into the NCSD service area, and would be served by the NFD and CAL FIRE. (Draft EIR, pp. 18-23 to 18-24; see also Master Response 9, Response to Comment IO41-66 to 69.)			

ATTACHMENT B

MVWPSP POST-FINAL EIR COMMENTS AND RESPONSES

Following the release of the Final EIR on May 3, Placer County continued to receive letters from members of the public addressing the proposed project and the EIR. From May 3 through the June 9, 2016 Planning Commission hearing the County received 53 comment letters, including materials submitted during the hearing. Between the June 9, 2016 and July 7, 2016 Planning Commission hearings, the County received an additional 43 comment letters, for a total of 96 comment letters. Approximately 40 people provided oral comments at the June 9 Planning Commission hearing, and 31 people provided oral comments at the July 7 Planning Commission hearing.

Many of the comment letters express opposition and recommend denial of the project. The comment letters have been forwarded to the Board of Supervisors for its consideration. Several comments address the responses to comments in the Final EIR and the three topics that were the subject of the follow-up reports for the July 7, 2016 Planning Commission meeting: 1) potential effects of the proposed project on Lake Tahoe; 2) fire evacuation and fire safety; and 3) future traffic operations and the long range plan for improvements on State Route 267. These topics were addressed in the July 7 staff report, including attachments.

Placer County received comments that the analysis in the EIR is inadequate or not compliant with CEQA, and requesting that the County revise and recirculate the Draft EIR. As addressed throughout the responses to comments in the Final EIR and those included herein, the Draft EIR was prepared in compliance with CEQA and provides a sufficient evaluation of the project's potential environmental effects for the public and decision makers. Many of the requests for recirculation were based on erroneous statements about the Draft EIR analyses; therefore, the suggestions that the Draft EIR needs to be revised and recirculated are not supported. As explained in the State CEQA Guidelines section 15151:

> An evaluation of the environmental effects of a proposed project need not be exhaustive, but, the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.

Most of the comments received after release of the Final EIR are similar to those received during the Draft EIR public review period. Therefore, some responses included herein refer the commenter and decision-makers to previous responses in the Final EIR and the June 9 and July 7 staff reports.

The following text provides responses to comments on the MVWPSP project and EIR received by Placer County since the release of the Final EIR on May 3, 2016. These responses are provided for informational purposes and do not change the conclusions of the EIR. Placer County staff and their consultants have reviewed the additional written and oral correspondence received since the release of the Final EIR. The County has determined that none of the conditions warranting recirculation of a Draft EIR, as specified in CEQA Guidelines Section 15088.5, has occurred, and the County believes the Draft EIR is complete and fully compliant with CEQA. Table 1 provides a list of commenters and assigns a number to each letter, labeled "PF" to indicate "Post-Final EIR."

Table 1 List of commenters following the publication of the Final EIR

Letter #	Commenter	Date
Post-Final EIR (PF)1	Ellie Waller	5/9/2016
PF2	Peggy Nicholas	5/9/2016
PF3	Robert S. Heinz	5/10/2016
PF4	Liz Penniman	5/11/2016

Table 1	List of commenters following the publication of the Final EIR	
Letter #	Commenter	Date
PF5	Veronica Blake	5/11/2016
PF6	Janice Eggers	5/12/2016
PF7	Ross and Nancy Johnson	5/14/2016
PF8	Jamie Casey	5/16/2016
PF9	MaryAnne Casella	5/24/2016
PF10	John Sell	Undated
PF11	Catherine Oliver	5/24/2016
PF12	Unsigned (jbchris)	5/24/2016
PF13	North Tahoe Preservation Alliance Ann Nichols	6/2/2016
PF14	California Clean Energy Committee and North Tahoe Preservation Alliance Eugene S. Wilson and Ann Nichols	6/3/2016
PF15	Northstar Community Services District, Northstar Fire Department Mark Shadowens	6/3/2016
PF16	Lorraine Comanor	6/3/2016
PF17	Ray Garland	6/3/2016
PF18	Jennifer Quashnick	6/3/2016
PF19	Ellie Waller	6/5/2016
PF20	Friends of the West Shore and Tahoe Area Sierra Club Group Susan Gearhart, Jennifer Quashnick, and Laurel Ames	6/6/2016
PF21	Remy Moose Manley Whit Manley	6/6/2016
PF22	George Binney	6/6/2016
PF23	Tim Ferrell	6/6/2016
PF24	Ellen Hyatt	6/6/2016
PF25	Laura Lambert	6/6/2016
PF26	Jim Sajdak	6/6/2016
PF27	Judith Tornese and Jerry Winters	6/6/2016
PF28	Don and Pam Wight	6/6/2016
PF29	MAP and Sierra Watch Alexis Ollar and Tom Mooers	6/7/2016
PF30	Truckee Sanitary District Blake Tresan	6/7/2016
PF31	Judy Carter	6/7/2016
PF32	Kurt Krieg	6/7/2016
PF33	Jan Robert	6/7/2016
PF34	Forrest Jones	6/7/2016
PF35	Phyllis Rogers	6/7/2016
PF36	Helga Roghers	6/7/2016

Table 1	List of commenters following the publication of the Final EIR	
Letter #	Commenter	Date
PF37	League to Save Lake Tahoe Darcie Collins	6/8/2016
PF38	League to Save Lake Tahoe Shannon Eckmeyer	6/8/2016
PF39	Derrek Aaron	6/8/2016
PF40	Maya T. Borhani	6/8/2016
PF41	Jan Ellis	6/8/2016
PF42	Sherry Guzzi	6/8/2016
PF43	Mary Hartnett	6/8/2016
PF44	Steve Pearsall	6/8/2016
PF45	Animal Consortium	6/9/2016
PF46	Ron Barraclough	6/9/2016
PF47	Joy Dahlgren	6/9/2016
PF48	Sue Daniels	6/9/2016
PF49	Gabi	6/9/2016
PF50	Michael Garabedian	6/9/2016
PF51	Sally Hammel	6/9/2016
PF52	Laurel Lippert	6/9/2016
PF53	Robert Schladale	6/9/2016
PF54	North Tahoe Preservation Alliance Ann Nichols	6/15/2016
PF55	John Schroeder	6/20/2016
PF56	Sustainable Community Advocates Steve Teshara	6/21/2016
PF57	Mike Schwartz	6/21/2016
PF58	North Tahoe Preservation Alliance Ann Nichols	6/22/2016
PF59	Ellie Waller	6/23/2016
PF60	MAP Alexis Ollar	6/23/2016
PF61	Tahoe Area Sierra Club Cindy Ochoa	6/26/2016
PF62	Friends of the West Shore Susan Gearhart and Jennifer Quashnick	6/27/2016
PF63	League to Save Lake Tahoe Darcie Collins	6/28/2016
PF64	Sierra Watch Tom Mooers	6/30/2016
PF65	League to Save Lake Tahoe, MAP, and Sierra Watch Darcie Collins, Alexis Ollar, and Tom Mooers	6/30/2016

Table 1 List of commenters following the publication of the Final EIR

Letter #	Commenter	Date
PF66	Sierra Watch Tom Mooers	6/30/2016
PF67	Linda Lapointe	6/30/2016
PF68	Margaret Martini	7/1/2016
PF69	Tom and Mary Jo McAllister	7/1/2016
PF70	Joanne McGrail	7/1/2016
PF71	Jen and Terry Yagura	7/2/2016
PF72	Bruce Corey	7/3/2016
PF73	Scott and Debra Schroepfer	7/4/2016
PF74	Ellie Waller	7/4/2016
PF75	Ron Grassi	7/4/2016
PF76	Friends of the West Shore. Tahoe Area Sierra Club, and Friends of the West Shore Susan Gearhart, Laurel Ames, and Jennifer Quashnick	7/4/2016
PF77	Boyce Williams	7/4/2016
PF78	Unsigned	7/4/2016
PF79	Janice Eggers	7/5/2016
PF80	John Baker	7/5/2016
PF81	Mike Schwartz	7/5/2016
PF82	Diane R. and James S. Morrison	7/5/2016
PF83	MaryAnn Casella	7/5/2016
PF84	Megan Chillemi	7/5/2016
PF85	Sally Grassi	7/5/2016
PF86	Al Weston	7/5/2016
PF87	Josselyn Robertson	7/5/2016
PF88	Adrienne Graham	7/5/2016
PF89	MAP Alexis Ollar	7/5/2016
PF90	Carolyn J. Smith	7/5/2016
PF91	Ellie Waller	7/5/2016
PF92	Michael Gorman	7/6/2016
PF93	Adrian Juncosa	7/6/2016
PF94	Mark McLaughlin	7/6/2016
PF95	Jennifer Quashnick	7/6/2016
PF96	Legal Services of Northern California W.G. Whitaker	7/6/2016
PF-AG	State of California Department of Justice Attorney General Kamala Harris, Nicole U. Rinke, David Zonana	9/6/2016

PF1

Fran Ruger

From: Stacy Wydra <SWydra@placer.ca.gov>
Sent: Monday, May 9, 2016 1:22 PM
To: Kurt Krieg (kkrieg@mountainsidepartners.com); Fran Ruger; Sydney Coatsworth; 'Adrienne Graham' (algraham@surewest.net); Suzanne Enslow
Cc: Paul Thompson
Subject: FW: Please disribute to NTRAC members

Please see comments below from Ellie Waller.

Stacy Wydra

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Ellie [mailto:tahoellie@yahoo.com]
Sent: Monday, May 09, 2016 12:27 AM
To: Steve Kastan
Cc: Jennifer Montgomery; Stacy Wydra
Subject: Please disribute to NTRAC members

Hi Steve,
I am unable to attend the upcoming May12 NTRAC meeting.
Please distribute my comments to NTRAC Council members as soon as possible before meeting. PF1-1

Appreciate your assistance.
~Ellie

Ellie Waller, Tahoe Vista resident. Comment on Martis Valley West Parcel

May 12, 2016 North Tahoe Regional Advisory Council

1

1). **What is the RUSH to approve Martis Valley West which was just released to the public on May 3, 2016? Not enough time has been afforded the public to come before this Council with comprehensive comments.**

Notice is hereby given on **May 3, 2016** that Placer County released a Final Environmental Impact Report (Final EIR) for the following project. PROJECT NAME: Martis Valley West Project Specific Plan (PGPA 20130080), State Clearinghouse No. 2014032087) PF1-1 cont.

While The Final EIR for the proposed Village at Squaw Valley Specific Plan was circulated for a 10-day public agency review period from **April 7, 2016** to April 18, 2016. The Village at Squaw Valley Specific Plan should be heard and approved first.

You as a council are being asked to make a recommendation to "Approve" the FEIR without the benefit of enough time to even just read response to comments which is several 100 pages and 46 pages titled Revisions to Draft EIR and Master Responses -42 pages. See below for link to DEIR comments to make sense of the responses which frankly lack merit and many state: will be determined during the certification process.

2). **The NTRAC Martis Valley West Parcel recommendation should be tabled to a future meeting** to allow sufficient time for comprehensive public comment and allowing you as council members time to review before making a recommendation on this contentious and precedent setting (allowing zone swapping, timber production location swap, many significant and unavoidable impacts, etc.) project.

Move to July NTRAC meeting or further out and have Board of Supervisors hear at Oct 24/25 Tahoe meeting or special meeting before October to be held in Tahoe. The Planning Commission hearing should also be after Squaw is heard. Rack and Stack Squaw meetings then Martis Valley West
http://www.placer.ca.gov/bos/agenda/agenda-calendar

3). There is also much confusion with the Revised Draft Specific Plan (May 2016) which is over 100 pages. What does it mean that **no comment period is assigned**? What is expected to be approved by the Placer County Planning Commission and Board of Supervisors in the FEIS and when will the public be afforded time to comment before agency and board members on the "Specific Plan" link below which includes detailed info on the proposed project including 73 pages in appendices along with a 46 page evacuation plan. PF1-2

There are 3 versions of the Specific Plan to compare for changes: the latest released May 2016: link below
https://www.placer.ca.gov/departments/communitydevelopment/planning/martisvalleywestparcelproject/martisvalleywestparceldraftsp

The release of both FEIR's state the obvious: Due to the regional significance of the project, Placer County has determined that no hearings will be scheduled to consider the project entitlements or certification of the Final EIR until at least 30-days after circulation of the Final EIR.

Persons wishing to provide comments on the Final EIR may do so. Comments will be added to the administrative record and are not further responded to in the EIR. Comments received will, however, be included in the record of public comments to the project and will be considered by the Planning Commission and the Board of Supervisors when they hear the project.

4). **Recently Tom Mooers of Sierra Watch posed the ultimate questions to Placer: have they been answered?** PF1-3

It's important for us to get these dates right in order to ensure that we're engaging expertise in the correct timeframe (for example, responding to the Squaw Valley Village Final EIR in advance of Planning Commission hearings) *and* so we can effectively encourage citizen involvement in the public planning process.
Three follow up questions:

1. These are the dates and locations we have for Squaw Village, Martis West, and Squaw/Alpine gondola hearings; are they correct?

May 9 Squaw/Alpine Gondola Scoping Sessions (Squaw Valley)
May 12 Martis Valley West Project (MVWP) at North Tahoe Regional Advisory Committee (NTRAC) (Tahoe City)
May 14 Squaw Valley Village project at Squaw Valley Municipal Advisory Committee (Squaw Valley)
June 9 (tentative) MVWP at Placer County Planning Commission (Granlibakken)
June 16 or 23 (tentative) Squaw Valley Village at Placer County Planning Commission (?)
July 25-26 (tentative) MVWP at Placer County Board of Supervisors (Tahoe)
August 9 (tentative) Squaw Valley Village at Placer County Board of Supervisors (Auburn/Domes)

2. Do you have a date for the release of the Draft EIR and a schedule of hearings for the Tahoe Area Plan?

Is the County considering staggering any of the decision-making processes for these projects and plans? These are decisions that, even if made over a matter of weeks, will have implications that will last generations. It seems impossible that such a stacked and accelerated calendar can allow for meaningful citizen involvement and agency engagement in the public planning process – not to mention placing an unreasonable burden on County staff and, even, the capacity of decision-makers to make thorough, well thought out decisions. PF1-3 cont.

5). Should NTRAC, as well as the Squaw Valley MAC, hear the Village at Squaw Valley Specific Plan as its effects are wide reaching into the Tahoe Basin as commented by the League to Save Lake Tahoe, TRPA, Friend of West Shore/Tahoe Area Sierra Club and Motherlode Chapter Sierra Club and many others? PF1-4

See link below to view all DEIR comments to try to make sense of responses.
https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/martisvalleywestparcel/draft%20eir/draft%20eir%20comments

As previously stated The release of both FEIR's state the obvious: Due to the regional significance of the project, Placer County has determined that no hearings will be scheduled to consider the project entitlements or certification of the Final EIR until at least 30-days after circulation of the Final EIR.

6). FYI- NTRAC doesn't have a say if entitlements or certification happens but does make a recommendation that goes forward which could be used to benefit how the Planning Commission and Board of Supervisors vote. PF1-5

The NTRAC Martis Valley West Parcel recommendation should be tabled to a future meeting.

PF1

Ellie Waller
May 9, 2016

PF1-1 The commenter questions the timing of the North Tahoe Regional Advisory Council (NTRAC) meeting on May 12, 2016 following the release of the MVWPSP Final EIR on May 3. The comment requests a postponement of the item. The comment suggests that the project's NTRAC and Planning Commission hearings should be postponed until after the Village at Squaw Valley is presented to the Planning Commission.

The MVWPSP Project was heard at the May 12, 2016 NTRAC meeting. The comment and suggestion are acknowledged.

PF1-2 The commenter inquires as to what will be approved by the Planning Commission and Board of Supervisors and when the public will be afforded time to comment on the Specific Plan.

Response to comment I051-2 in the Final EIR explains the relationship between the Specific Plan and the EIR:

The comment requests a defined process describing the relationship of the MVWPSP and the Draft EIR. As described in Section 1.6 of the Draft EIR, "Environmental Review Process and Public Involvement," the public review process of the Draft EIR provided for concurrent review of the proposed MVWPSP, which is the subject of the environmental review document. The public has had access to review the complete Draft MVWPSP, the Draft EIR, and the NOP and Initial Study, all of which are available on the County's website: http://www.placer.ca.gov/departments/communitydevelopment/planning/martisvalleywestparcelproject/martisvalleywestparceldraftsp. As stated on the County's website, under "2015 Public Draft Specific Plan," the draft Specific Plan does not have a comment period assigned to it. Comments on the Draft Specific Plan will be forwarded to the decision makers. The MVWPSP is the project analyzed in the EIR, not a CEQA document in and of itself. However, per State CEQA Guidelines Section 15204, in reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

Approvals that are subject to Planning Commission and Board or Supervisors actions will be included in the staff reports for each meeting. Public comment was heard at the June 9 and July 7 Planning Commission meetings, and public comments will be taken at the subsequent Board of Supervisors meeting. Both of these meetings have or will take place at least 30 days following the May 3, 2016 release of the Final EIR.

PF1-3 The comment addresses tentative dates listed for several Placer County projects and asks if the County is considering staggering the decision-making processes.

Public hearing and meeting information will be posted on the County's website as meetings are scheduled. As demonstrated by the continuation of the MVWPSP item during the Placer County Planning Commission meeting, schedules are subject to change.

PF1-4 The comment suggests that NTRAC and the Squaw Valley Municipal Advisory Council (MAC) hear the Village at Squaw Valley Specific Plan because the project's effects reach into the Tahoe Basin. The suggestion is acknowledged. MVWPSP and Village at Squaw Valley projects are separate projects proceeding independently. Please see the Squaw Valley Plan Final EIR.

See response to comment PF1-2, above regarding Planning Commission and Board of Supervisors hearings taking place at least 30 days after the May 3, 2016 Final EIR release.

PF1-5 The comment reiterates previous comments in this letter regarding schedule and postponement. See responses to comment PF1-1 and PF1-2.

Fran Ruger **PF-2**

From: Stacy Wydra <SWydra@placer.ca.gov>
Sent: Monday, May 9, 2016 4:08 PM
To: Kurt Krieg (kkrieg@mountainsidepartners.com); Fran Ruger; Sydney Coatsworth; 'Adrienne Graham' (algraham@surewest.net); Suzanne Enslow
Cc: Paul Thompson
Subject: FW: NTRAC - Comments for May 12 meeting

Hello All
Please find additional comments provided to the NTRAC members.
And just to make it clear – we are not going to provide a formal response to these comments provided.
Please let me know if you have any questions or need additional information.
Thanks!
Stacy

Stacy Wydra

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Peggy Nicholas [mailto:nicholasp@prodigy.net]
Sent: Monday, May 09, 2016 4:02 PM
To: Steve Kastan
Cc: Jennifer Montgomery; Stacy Wydra
Subject: NTRAC - Comments for May 12 meeting

Mr. Kastan:

I've been following the Martis Valley West project closely, and regretfully can't attend the May 12th meeting due to the short notice. Please forward my comments (below) to the NTRAC members at your earliest convenience in advance of the meeting. PF2-1

Many thanks,

Peggy Nicholas

1

New Alternative # 5: Reduced density on the East Parcel. This Alternative purports to remove, without a doubt, any perceived scenic violations of the Tahoe Basin. The FEIR states that no visual issues will occur, but that can't be proven -- especially night time light -- until the project is actually built, and then OOPS SORRY you have glow over into the Tahoe basin. This could be avoided completely by building the reduced density project on the East Parcel. As stated: all other significant and unavoidable impacts exist so build it on the East side. And modification of Alt 5 to add the sale of land for a conservation easement is a no brainer. PF2-1 cont.

Page 6 of attachment - Alternative 5: East Parcel Reduced Density Alternative, which assumes development of 418 units on 200 acres of the East Parcel, designating the remainder of the current East Parcel development area as Forest and zoning it TPZ, and leaving the existing Forest designation and TPZ zoning over the West Parcel. Alternative 5 would not involve placing the East Parcel in permanent conservation.
As shown in Table 2-2, Alternative 1, the No Project – No Development Alternative, is the environmentally superior alternative, as all of the significant impacts of the project would be avoided. CCR Section 15126.6 suggests that "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." PF2-2
Of the development alternatives, Alternative 3, the Reduced Density Alternative, would be the environmentally superior alternative. This alternative would meet the basic project objectives and would reduce the severity of impacts to forest resources; population, employment, and housing; biological resources; cultural resources; visual resources; transportation (reduced vehicle trips); air quality; GHG emissions; noise; geology, soils, and seismicity; hydrology and water quality; utilities; public services and recreation; and hazards and hazardous materials. However, it would not avoid the significant and unavoidable impacts identified for the proposed MVWPSP.

Page 35 of attachment 2.2.13 Revisions to Chapter 19, "Alternatives"
In response to comments IO31-45 and IO31-46, which suggested additional alternatives to be evaluated in the EIR, the test of Chapter 2, Section 2.3, "Alternatives to the Proposed Project," on pages 2-6 and 2-7 of the Draft EIR is revised as follows:
19.8 ALTERNATIVE 5: EAST PARCEL REDUCED DENSITY ALTERNATIVE
Alternative 5, the East Parcel Reduced Density Alternative, would reflect the same features as Alternative 2, the No Project – MVCP Alternative, described in Section 19.5, but would reduce the number of units from 1,360 to 418 (similar to the unit count evaluated in Alternative 3, Reduced Density Alternative, on the West Parcel) and would reduce the developable area from 670 acres to 200 acres. In all other respects, this alternative would be the same as Alternative 2, the No Project – MVCP Alternative. As with Alternative 3, the West Parcel Reduced Density Alternative, the unit count of 418 would reduce the magnitude of the significant traffic impacts of the proposed MVWPCP. By virtue of its reduced level of development, it would result in largely commensurate impact reductions in virtually all environmental issue areas.

The majority of the 6,376-acre East Parcel and all of the West Parcel are designated Forest and zoned TPZ. However, the MVCP designates approximately 670 acres of the East Parcel as Low Density Residential and General Commercial, with corresponding zoning of Single-Family Residential and Neighborhood Commercial (Exhibit 19-1). Under Alternative 5, development would occur pursuant to the MVCP land use designations, as described for Alternative 2 (above). However, the area zoned Single-Family Residential and Neighborhood Commercial would be reduced to 200 acres, and the balance (470 acres) would be rezoned as TPZ and designated Forest, to be preserved with the remainder of the East Parcel. In addition, the number of residential units would be reduced to 418. Similarly, commercial development would be constructed, but would also be reduced, resulting in approximately 3.6 acres (approximately 19,000 square feet) of commercial

development. All other development details would be the same as Alternative 2, including utilities, roads, recreational amenities, and project phasing. Under Alternative 5, there would be no conservation easement or sale of lands to a conservancy or land trust. PF2-2 cont.

Thank you for the opportunity to comment.

Peggy Nicholas
P.O. Box 5
Carnelian Bay, CA 96140
Phone: 530-581-3017
Cell: 530-412-4121

PF2

Peggy Nicholas
May 9, 2016

PF2-1 The comment addresses Alternative 5 in the Final EIR, raising concerns regarding night lighting, and stating that this alternative could easily be modified to add the sale of land for a conservation easement. See the Final EIR, which evaluates the reduced density development alternative on the East Parcel and incorporates the information into Chapter 19, "Alternatives," of the Draft EIR. Please see response to comment IO31-45 and Chapter 2, "Revisions to the Draft EIR," of the Final EIR for analysis of this alternative and revised text. As evaluated in Section 19.8.5, the visual impacts of Alternative 5 would be similar to the proposed MVWPSP and the alternative would result in the same significant and unavoidable impact.

Comments regarding preferences for project alternatives will be included in information forwarded to the Placer County Board of Supervisors for their consideration.

PF2-2 The comment describes Alternative 5, which was included in the Final EIR. Please see response to comment IO31-45 and Chapter 2, "Revisions to the Draft EIR," of the Final EIR for analysis and revised text.

Comments regarding preferences for project alternatives will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF3

Robert S. Heinz

May 10, 2016

Dear Mr. Kastan,

I want to express my deep concern in opposition for the planned 760 home, Martis West development and the contiguous 550 space, Basin encroaching, camp ground paralleling Hwy. 267. 267 being one of only two (2), single lane evacuation routes from the North Shore. Hwy. 267 during peak seasonal activity is already at congestion capacity. Cal Trans currently rates Hwy. 28 & 267 a D-. How then will the inarguable increase in local congestion have these our area highways rated? How will this increase in traffic serve or benefit the safety of our community if the only rating left is an F? PF3-1

Please take note of current events in Alberta, Canada. Over 800 square miles are currently ablaze, over 2000 structures have been destroyed and upwards of 90,000 inhabitants have been displaced, and this fire is largely on flat ground, not in a mountainous bowl. It is only a matter of time before a major wildfire threatens the Tahoe Basin, a bowl with few evacuation options. The Tahoe Basin will be a death trap for those who can't escape. Please, take a look at what remains of the residential neighborhoods and the business communities surrounding Fort McMurray in Alberta. Who would volunteer to tell those residents they should have sheltered in place, as is a proposed option for the North Shore!

I have been in the midst of a 100,000 acre wildfire. The Clampitt Fire in September, 1970 burned from Simi Valley, CA. to Pacific Coast Hwy. in Malibu, 20 miles to the west. Everything was ablaze, flying embers were blowing faster than I could run or drive. It was near impossible to breath, the ground was so hot is was difficult to stand still. As flames and embers swept across roads, people panicked, fleeing residents stopped in their tracks causing accidents and gridlock behind. The North Shores' roads are often already gridlocked, and getting noticeably worse every year. How much more can our existing infrastructure safely support or absorb before the Jewell of the Sierras looses its shine forever? Who will then come here?

.....and where is the water going to come from to service all these new homes?

Please, I ask you to do what is best for the Jewell, for our irreplaceable environment and for resident safety. Deny these development permits that encourage and support the wholesale evisceration of Lake Tahoe, solely for profit. You are guardians of Lake Tahoe's future. Please, do the right thing.

"We won't have a society if we destroy the environment." Margret Mead

Respectfully,

Robert Heinz

P.O. Box 7554 Tahoe City, Ca. 96145

PF3

Robert S. Heinz
May 10, 2016

PF3-1 The comment expresses concern regarding traffic increases and safety, particularly in regard to wildfire hazards and evacuation. These issues are addressed in the Final EIR in Master Response 9, "Emergency Plan and Emergency Evacuation." Please see Master Response 9 in Section 3.1.9 of the Final EIR.

The comment questions what the water supply would be for the MVWPSP. Water supply issues are addressed in Chapter 15, "Hydrology and Water Quality," and Chapter 16, "Utilities," of the Draft EIR based on a project-specific water supply assessment (WSA). Two water supply options are evaluated. The first option would be to rely solely on existing and planned NCSD wells, as evaluated in the WSA. The second option would be to obtain some or all water supply from new, onsite wells that would ultimately be incorporated into the NCSD system and operated by NCSD. Please see Master Response 8 in Section 3.1.8 of the Final EIR for additional response to water supply concerns.

The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF4

Liz Penniman
PO Box 324
Kings Beach CA 96143

RECEIVED
BOARD OF SUPERVISORS
5BOS TI ALL AIDES (mail person)
MAY 11 2016
SUP COB Corr CoCo
AIDE CEO Other

Jennifer Montgomery
Placer County Supervisor
175 Fulweiler Avenue
Auburn, CA 95603

RECEIVED
BOARD OF SUPERVISORS
5BOS X TI X ALL AIDES lve (mail person)
MAY 11 2016
SUP COB Corr X CoCo
AIDE CEO Other

May 7 2016

Dear Jennifer,
I am a resident of this beautiful place, Lake Tahoe, and I want you, please, to say No to the Martis Valley West Project as it is currently proposed: stop the sprawl, downsize the project to a reasonable number of units, get it off the ridge, cluster new development, and schedule hearings with adequate time for review of the supporting documentation. PF4-1

Please, do the right thing. Don't be the politician who is only remembered for orchestrating the demise of our beautiful ridgetops, forest, and way of life.

Thank you, Liz Penniman

PF4

Liz Penniman
May 7, 2016

PF4-1 The comment expresses opposition to the project as it is currently proposed. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Issues related to direct and induced growth, project alternatives, and ridgeline development are evaluated in the EIR.

PF5

Fran Ruger

From: Stacy Wydra <SWydra@placer.ca.gov>
Sent: Wednesday, May 11, 2016 9:50 AM
To: Kurt Krieg (kkrieg@mountainsidepartners.com); 'Adrienne Graham' (algraham@surewest.net); Fran Ruger; Sydney Coatsworth; Suzanne Enslow
Cc: Paul Thompson
Subject: FW: Martis Valley West Parcel Specific Plan

As discussed... see below.
Thanks!
Stacy

Stacy Wydra

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

County of Placer

From: Kathi Heckert
Sent: Wednesday, May 11, 2016 9:40 AM
To: Veronica Blake
Cc: Stacy Wydra
Subject: RE: Martis Valley West Parcel Specific Plan

Comment received. I am forwarding it to Stacy Wydra as she is the Planner for the Martis Valley West Parcel Specific Plan.
It will also be attached to the staff report for the Planning Commissioner to consider.

Thank you.

Kathi Heckert, Senior Board/Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

From: Veronica Blake [mailto:vblake@placercf.org]
Sent: Wednesday, May 11, 2016 9:33 AM
To: Kathi Heckert
Cc: Allen Breuch
Subject: Martis Valley West Parcel Specific Plan

Thank you for allowing the community to give comment to this project by email. I am sure it comes as no surprise to you that Placer County lacks an adequate supply of workforce and affordable housing. As it is needed for the community to grow and prosper, we hope the need to meet the workforce and affordable requirements in the housing element (in all of the proposed projects) is taken seriously. Though the policy allows for various options (in lieu fees, dedication of land, building or a combo) we believe the community needs the actual construction of the workforce housing units. We strongly encourage the applicant and county to do everything possible to construct them. PF5-1

Sincerely,

Veronica Blake

Veronica Blake, CEO
Placer Community Foundation
www.placercf.org
530-885-4920

PF5

Veronica Blake, CEO
Placer Community Foundation
May 11, 2016

PF5-1 The comment expresses concern regarding adequate supply of workforce and affordable housing in the region and encourages the actual construction of workforce housing units for the MVWPSP. Please see responses to comments PF21-1 through PF21-3. The applicant supports the construction of workforce housing but believes the project site is not the appropriate location and would not pursue the construction of workforce housing units on the site, but rather will pay an in-lieu fee. The in-lieu fee for the MVWPSP Project is based on an assessment of $117,000 per workforce housing unit (21 units x $117,000= $2.45 million). The applicant would comply with the County's policies regarding workforce housing. In addition, the MVWPSP Development Agreement provides for an additional payment to develop and assist and with determining regional workforce housing needs.

PF6

From: Janice Eggers
To: Placer County Board of Supervisors
Subject: Vote NO on the Martis Valley West Project
Date: Thursday, May 12, 2016 6:33:11 AM

To Whom it May Concern;

Unfortunately, I am unable to attend the quickly scheduled hearing for the Martis Valley West Project. As a dedicated educator, I am not able to take the time off of my position, in order to read a document as lengthy as this report in the short time given to the public. I am very disappointed to review many aspects of the Environmental Impact Statement for the project that I have had the time to read. PF6-1

I do not feel that my comments or concerns were addressed in the report. As a homeowner on Allenby Way, off of highway 267, I have major concerns. Under the Regional Traffic Plan, the studies statistically show data that is misleading, and inconclusive to our current conditions in the Tahoe Basin:

Part of the report was based upon Summer 2010 driving conditions. (This was still a time of the recession that we just encountered as a country. People could not afford to travel. The tourist count during that year was way off of what it is today.) A better count would have been this summer 2015, 4th of July, when cars were backed up on the south lane of highway 267 all the way to highway 80. It took people 4-6 hours to get in to Kings Beach based on the number of vehicles on the road.

"Impact 18-4 discusses interference with an emergency evacuation plan. As discussed therein, the project would not cut off or otherwise modify any existing evacuation routes." Really? I witnessed the flood of 1997-98. It took drivers 8 hours to get from Kings Beach to highway 80. We could not leave our home, as the Northbound lane of 267 was blocked all the way to Truckee. There were no porta potties, garbage cans, or emergency crews helping people that were stuck on that road. By putting in another major development, the turn sections alone would cause more problems in an evacuation/emergency time. PF6-2

"In addition to the draft EPEP prepared for the Specific Plan, further analysis of traffic conditions during an evacuation scenario has been conducted (LSC 2016)." I am wondering if this person worked with the evacuation of the Valley Fire this last fall in California? How can someone actually predict what will happen in an evacuation circumstance? There are way too many variables to try to create a scenario for the Tahoe Basin. What if routes are blocked as in the flood of 1997-98? PF6-3

"Hours or days of lead time could be available to assess risk and make evacuation determinations. During these periods, peak occupancy conditions typically do not occur as drifting smoke, awareness of the risk, or other factors result in people avoiding the area."

In the flood of 1997-98, people were stuck on the road trying to get out of the basin. If people are stuck for 8 hours again on 267 due to a fire, there will be casualties and injuries. The Valley fire showed us what happens in a community that is built out, and does not have the capabilities to support a major evacuation. I am sure that all of you viewed the pictures of the burned homes, cars, livestock, and pets after that fire that the media posted online, as well as the survivors themselves. It was devastating. PF6-3 cont.

I am hoping that you will do the right thing for our community. I am asking you for a **NO** vote to this development, and a **no** vote to the proposed Brockway Campground. PF6-4

Lastly, I will be writing our governor, and our other Senators and Representatives about this project. This is truly not what our community wants, and nor is it a viable project for the beautiful Lake Tahoe Basin.

Sincerely,
Janice Eggers

PF6

Janice Eggers
May 12, 2016

PF6-1 The comment expresses concern regarding traffic congestion in the project area. Please refer to Chapter 10, "Transportation and Circulation," of the Draft EIR and Master Response 5 in Section 3.1.5 of the Final EIR, which address these concerns.

PF6-2 The comment expresses concern regarding traffic increases and safety, particularly in regard to emergency evacuation. These issues are addressed in the Final EIR in Master Response 9, "Emergency Plan and Emergency Evacuation." Please see Master Response 9 in Section 3.1.9 of the Final EIR.

PF6-3 The comment questions the ability to meaningfully evaluate evacuation because of the number of variables involved in emergency scenarios. The memo, referenced in the comment, that was prepared to quantify (in hours) the time that would be required for a full evacuation of the proposed MVWPSP Project is provided in the administrative record as reference LSC 2016. Please see response to comment PF13-8 for additional information regarding the methodology used in the preparation of the memo.

PF6-4 The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

The comment also expresses opposition to the Brockway Campground Project, a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal.

PF7

May 14, 2016

RECEIVED
BOARD OF SUPERVISORS
5BOS__ TI__ ALL AIDES __ (mail person)
MAY 18 2016
SUP__ COB Corr__ CoCo__
AIDE__ CEO __ Other__

TO: JENNIFER MONTGOMERY
175 Fulweiler Ave.
Auburn CA 95603

FROM: Ross & Nancy Johnson
P O Box 1524
Carnelian Bay CA 96140

SUBJECT: MARTIS VALLEY WEST PROJECT

Dear Jennifer Montgomery:

As permanent residence of Carnelian Bay for the past 15 years and West Lake Tahoe for the past 10 years, my wife and I are concerned about the Martis Valley West Brockway Campground. There are so many facts that prove this project to be a community disaster and most of all a fire hazard and road blockage which would choke the main road evacuation which is already at max. PF7-1

As Placer County Supervisor, District 5, we ask that you stop this project and uphold your pledge as outlined in your Statement of Candidate for Supervisor, 5th District voter information pamphlet, wherein you state "I pledge to work for you the people of Placer County. I promise to listen to your concerns, to be available and responsive. I work hard to fulfill those pledges. You'll have my ears and voice."

The Sierra Sun article of May 11, 2016, page 8 by Ann Nichols says it all. This project is a DISASTER FOR PLACER COUNTY, for the wild life and vegetation and most of all the safety of the residence in this community. Your voice and vote against this proposal is vital.

ROSS & NANCY JOHNSON

Ross Johnson Nancy Johnson

CC: George Williams

Mr. Ross M. Johnson
PO Box 1524
Carnelian Bay, CA 96140-1524

PF7

Ross and Nancy Johnson
May 14, 2016

PF7-1 The comment expresses opposition to the project, citing concerns related to wildlife, vegetation, and safety. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

From: Jamie Casey [mailto:granitediorite@gmail.com]
Sent: Monday, May 16, 2016 9:25 AM
To: Stacy Wydra
Subject: Re: Martis Valley West

PF8

Hello Stacy
I oppose the Martis Valley West project on the ridge line above Carnelian Bay on HWY 267, It would destroy a beautiful wilderness area albeit not exactly roadless, but minimally used by skiers, snowmobilers, etc. A development there would mean large buildings and bright lights with would be a complete eyesore as well as disrupt animal migrations across the area and open space that we treasure so highly. Many other communities in the US have made a point of protecting their ridge lines. It makes really good sense to keep the ridge line unspoiled! I would appreciate your vote agains the project! PF8-1

I plan to be at the June 9 meeting and would like to know where it will be held.
thanks,

jamie Casey

PF8 Jamie Casey May 16, 2016

PF8-1 The comment expresses opposition to the project, citing concerns related to wildlife, visual impacts, and ridgelines. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

PF9

From: MaryAnne Casella <macasella1@gmail.com>
Sent: Tuesday, May 24, 2016 9:20 PM
To: Jennifer Montgomery
Cc: Kirk Uhler; Robert Weygandt; Jack Duran; Jim Holmes; Kathi Heckert
Subject: Coffee, May 26 - Martis Valley West

Jennifer, I am not able to attend your coffee but I am scared to death about this Martis Valley proposal!

The roads of the Tahoe area can NOT handle the traffic that this development would generate. PF9-1

Last year we needed to leave Tahoe Vista at the end of the 4th of July weekend. It took us almost an hour in bumper to bumper traffic to get up 267 just to hiway 80. This proposal will compound the mess on that route with hundreds more cars.

I feel that no large developments should be permitted until the said developer provides funds for improving roads & utilities — & those should be completed BEFORE any development construction begins.

The two lane highways in the Tahoe basin are not enough to handle the various proposed developments we keep hearing about. If a major fire breaks out (& you know in your heart that some day it will) thousands of lives will be lost as people TRY to escape the basin inferno. Please think about this every time a major development plan comes before you.

Respectfully,
MaryAnne Casella
217 Laurel Dr.
Tahoe Vista, CA

PF9

Mary Anne Casella
May 24, 2016

PF9-1 The comment expresses concern regarding traffic congestion in the project area. Please refer to Chapter 10, "Transportation and Circulation," of the Draft EIR and Master Response 5 in Section 3.1.5 of the Final EIR, which address these concerns.

The comment expresses concern regarding traffic increases and safety, particularly in regard to emergency evacuation. These issues are addressed in the Final EIR in Master Response 9, "Emergency Plan and Emergency Evacuation." Please see Master Response 9 in Section 3.1.9 of the Final EIR.

Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF10

"Just Say No To Martis Valley West"

The sophistry of downsizing as a concession from Tahoe developers to gain project approval is creating a broken system. Actually downsizing is a backhanded acknowledgement that development at proposal scale is too much. It has become a tool that is supposed to leave stakeholders feeling better that the smaller project could have been worse (that is to say larger). Too often the tactic is justified by system-wide environmental trade-offs that somehow ameliorate earlier or competing development activities. Ironically saying no on those projects may have prevented the issues in the first place. PF10-1

This broken system is arguably better than no system and again we are supposed to be thankful. But meanwhile Tahoe is being converted into something less special. Just because it is happening less quickly if projects are smaller is not really comforting.

The proposed Ridgeline project (Martis Valley West Parcel) is particularly galling because it would develop one of the few relatively pristine features of the area. Oh sure, some might be taken-in that it will be smaller than originally proposed, but over time the precedent of the project and inertia of Tahoe's culture of growth and development will regain.

The capacity and resilience of the area to absorb more projects with the people and culture they are designed to attract is not limitless. The signs of environmental stress due to development are already everywhere. Why convert an area that remains unstressed? I urge the Placer County Planning Commission to "just say no" to the Martis Valley West project. Preserve Lake Tahoe.

John Sell
Crystal Bay NV

PF10

John Sell
June 8, 2016

PF10-1 The comment expresses opposition to the project, citing environmental concerns. Environmental impacts related to the MVWPSP are evaluated in the EIR. Comments regarding opposition or preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

The comment alleges piecemealing of the Brockway Campground Project. Please see Master Response 2 of the Final EIR regarding concerns related to the separate Brockway proposal.

Kathi Heckert

PF11

From: catholiver@aol.com
Sent: Tuesday, May 24, 2016 4:56 PM
To: Kathi Heckert
Subject: Re: Final legal notice for Martis Valley West Parcel Specific Plan

I have no knee-jerk objection to this development. My objection is based on the fact that we remain in a drought. A drought that some experts say may last a hundred years. We are rationing water. How do you justify ANY new development that's going to use that kind of water? I objected to the previous proposed development for the same reason. Thank you. PF11-1

Catherine Oliver
440 High Street
(PO Box 1053)
Carnelian Bay CA 96140

-----Original Message-----
From: Kathi Heckert <KHeckert@placer.ca.gov>
To: Kathi Heckert <KHeckert@placer.ca.gov>
Cc: Shirlee Herrington <SHerring@placer.ca.gov>
Sent: Tue, May 24, 2016 4:49 pm
Subject: Final legal notice for Martis Valley West Parcel Specific Plan

Hello Interested Parties

Please see attached legal notice and map for above mentioned project.

Thank you

Kathi Heckert, Senior Board /Commission Clerk,
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

PF11 — Catherine Oliver, May 24, 2016

PF11-1 The comment expresses opposition to the project, citing concerns related to drought and water supply. Water supply issues are addressed in Chapter 15, "Hydrology and Water Quality," and Chapter 16, "Utilities," of the Draft EIR based on a project-specific water supply assessment (WSA). Two water supply options are evaluated. In addition, please see Master Response 8, "Water Supply, Drought, and Climate Change," in Section 3.1.8 of the Final EIR.

The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert **PF12**

From: Kathi Heckert
Sent: Wednesday, May 25, 2016 7:53 AM
To: 'jbchris118@att.net'
Cc: Stacy Wydra; EJ Ivaldi; Paul Thompson
Subject: RE: Final legal notice for Martis Valley West Parcel Specific Plan

There has been no evening or weekend meeting scheduled for the Planning Commissioners.

You are welcome to e-mail or send via US mail a written comment and it will be part of the record.

Thank you.

Kathi Heckert, Senior Board /Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

From: jbchris118@att.net [mailto:jbchris118@att.net]
Sent: Tuesday, May 24, 2016 8:19 PM
To: Kathi Heckert
Subject: Re: Final legal notice for Martis Valley West Parcel Specific Plan

PF12-1

Will there be a meeting in the evening or on s weekend that working people can attend?

Sent from my iPhone

On May 24, 2016, at 4:46 PM, Kathi Heckert <KHeckert@placer.ca.gov> wrote:

> Hello Interested Parties
>
> Please see attached legal notice and map for above mentioned project.
>
> Thank you
>
> *Kathi Heckert, Senior Board /Commission Clerk*
> *Placer County CDRA*
> *3091 County Center Drive*
> *Auburn CA 95603*
> *(530) 745-3082*

PF12 Jbchris May 24, 2016

PF12-1 The commenter questions if there would be an evening or weekend meeting for the MVWPSP Project. The County Clerk provided response on May 25, 2016, stating that there was no evening or weekend meeting scheduled for the Planning Commission, but that comment could be sent via email or US mail and be included as part of the record.

PF13

North Tahoe Preservation Alliance
P.O. Box 4
Crystal Bay, Nv. 89402
775-831-0625
www.ntpac.com

"Helping preserve the natural beauty and rural character of North Lake Tahoe"

6/2/2016

Via e-mail and hand delivery

Ms. Stacy Wydra
Placer County Community Development Resource Agency Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Martis Valley West EIR/ FEIR

Dear Ms. Wydra:

This letter provides comments on the abovementioned DEIR/FEIR. The North Tahoe Preservation Alliance (NTPA) is a Nevada Nonprofit Corporation formed in 2008 to ensure that North Lake Tahoe retains its natural beauty and easygoing, rustic lifestyle. Its Board of Directors is comprised of long-time Tahoe residents and property owners. NTPA was originally formed to analyze a new 850k square foot development on North Stateline named Boulder Bay. When the Martis Valley West project came up in 2013, we developed the website: www.savetahoeforests.com and later began two petitions: PF13-1

1. "Tahoe Regional Planning Agency: Establish enforceable ridgeline protections in the Lake Tahoe area" which garnered 1559 supporters and (Ex. A & USB Drive)
2. "Placer County Board of Supervisors: Remove Tahoe Basin portion of Martis Valley West project" which received 3,327 supporters. (Ex. A & USB Drive)

This letter provides comments on the DEIR that are in addition to and do not replace or otherwise supersede comments that were previously submitted. Please contact us if you have any difficulty in viewing the documents. Accompanying this letter is a USB flash drive containing electronic copies in pdf format of the documents listed in the appendix to this letter. Please contact us if you have any difficulty displaying the documents.

For the reasons set forth below, the DEIR needs to be revised and recirculated. Ongoing mitigation should be required by recorded covenants, conditions, and restrictions on the project site as discussed below. The development agreement should contain similar provisions. PF13-2

North Tahoe Preservation Alliance appreciates this opportunity to comment on the Martis Valley West DEIR/FEIR.

After careful review, NTPA has come to the conclusion that the DEIR/FEIR fails to comply with the requirements of CEQA because it fails to:

1. **Adequately describe the project;**

2. **Analyze the significant environmental impacts of the project or adequately mitigate those impacts; and**
3. **Undertake a legally sufficient study of alternatives to the project.**

PF13-2 cont.

These significant failures of the DEIR/FEIR are discussed in more detail below.

As a result, there can be no meaningful public review of the project. Placer County must revise and recirculate the DEIR in order to permit an adequate understanding of the environmental issues at stake. Approval of the project would violate CEQA and California Planning and Zoning Law. (gov't Code 65000 et seq.).

1. The DEIR provides an incomplete description of the project and the project setting.

PF13-3

The DEIR failed to accurately describe the local and regional context of the Project. As a full time 40-year-plus resident of North Tahoe and a Nevada and California Real Estate Broker since the 1970s, I have a deep knowledge of the area and its existing development. I have also had numerous site visits to the MVW project area over the last two years. The Fibreboard Freeway recreation area is a significant recreation resource for the entire region and is heavily used by migrating wildlife.

No Terrain Analysis:

We asked for a 3D terrain analysis of the site similar to that provided on the Brockway Campground (see attached Terrain study exhibit B), but FEIR refused to provide one, claiming there was sufficient information on terrain. There is a contour map provided in the EIR which is difficult to read and fails to show the true slope of the site (see attached Area Study Map from DEIR Ex. C). A 3D terrain analysis would have clearly shown the project is <u>not entirely</u> "on opposite sides of a ridge" as stated in the FEIR (pages 3-7). In fact, the project site consists of two benches, one that slopes towards Lake Tahoe and one that slopes toward Sawmill Flats and Truckee. This erroneous "opposite sides of the ridge" claim continually infects the entire DEIR and FEIR, and significantly misleads the public. Per the FEIR pages 3-7, "All other project components and infrastructure are located outside the Tahoe Basin, on the opposite side of the ridge. Secondly, there are two projects (Brockway Campground and MVW) being proposed at approximately the same time, and they are proposed in the same general area (albeit on opposite sides of a ridge)." They are in actual fact directly adjacent. Per the FEIR pages 3 – 8: "development would not be located on the highest elevations or ridgelines that separate the Tahoe Basin from surrounding areas." In fact, development <u>is proposed on the highest elevations</u>, as shown here and in the attached DEIR conceptual land use plan (Ex. D).

Drone View from site looking at Lake Tahoe showing site sloping to Lake Tahoe and bench sloping towards Truckee.

Project Not Near Existing Development:

In addition, the DEIR and FEIR repeatedly make the false claim that the project is near existing development which will " minimize isolated development that leads to fragmentation of open space and natural resources by developing on lands in proximity to existing development," when in fact the project location is located in the middle of forest/conservation lands that are over 5 miles by car (approximately 1.5 miles cross-country) from the nearest existing development, and more than one mile away from the only major road (SR 267) in proximity; see attached scaled DEIR Appendix D Evacuation Route map from project developer (Ex. E). The FEIR fails to address this concern; simply removing the term "infill" in the FEIR fails to correct these project mischaracterizations. "Near" is also a very vague term, and we are unclear as to the rationale used for considering these considerable distances. The FEIR admits that "The West Parcel development area is proposed approximately one mile east of the Northstar Resort" but then makes the claim that it "contains similar residential uses and densities to those proposed in the MVWPSP," and also that "the resulting visual character of the plan area would be consistent with other nearby development." The Northstar Resort, over 1 mile through the forest is the nearest development site. It consists of a ski run which is hardly similar to a residential gated development. This kind of misleading claim is a perfect example of how a developer justifies creating sprawl. PF13-3 cont.

The DEIR/FEIR also erroneously states the project will "limit new infrastructure and disturbance by developing on lands in proximity to existing development." All existing development and infrastructure are approximately 1.5 mile through the forest or 5 miles by car. Disturbance for new infrastructure alone will be significant – about 11 acres (DEIR Table 14-3).

2. The DEIR/FEIR employ improper resident occupancy rate. PF13-4

In Master Response 5, resident occupancy rate of 20% is assumed. This figure was supplied by a local Realtor, Jeff Brown of Tahoe Mountain Resorts, who is associated with the project developer, Mountainside Partners. This is hardly an arm's-length expert. According to the 2010 census, 53% of the residences in Northlake Tahoe are used seasonally, 25% are occupied full time by owners, and 13% are occupied by full time renters. The Truckee Census from 2010-2014

says 63% of the housing is occupied full time (http://www.census.gov/quickfacts/table/PST045215/0680588). Why wasn't a more reliable information source such as the census used for this calculation, especially since the traffic/circulation data was based on these numbers?
The FEIR claims that most of the project units would be second homes or fractional. The public could analyze this information if the document disclosed how many of the units were fractional or timeshare, again the DEIR/FEIR fails in this regard.

In master response 5, "Comments also addressed the assumptions for internal and external trip generation. As explained in the Draft EIR, the trip generation rate from ITE for second homes (ITE code 260 – recreational homes) already considers internal trips within the recreational home community". However, as a 40+ Real Estate Broker, my opinion is that even if the occupancy of Martis Valley West was 100% much less the claimed 20% full time residents, the project would be unable to support commercial uses since 760 units aren't enough critical mass to support a market or quick stop that would be located in a gated community an inconveniently long distance away from SR 267. See my attached survey of commercial vacancies in the Truckee and Kings Beach area. (Ex. G) PF13-4 cont.

3.The project is inconsistent with TRPA Regional Goals to limit VMT in the Tahoe Basin.

This project would have significant negative impacts on the Tahoe Basin, especially since the project itself and other recently approved projects in Lake Tahoe and Truckee will almost certainly exceed allowable VMT use for the Tahoe Basin (see Table 4-2 DEIR Cumulative Project List). (See Joy Dahlgren's Traffic Comments Ex. F) PF13-5

The FEIR (3-18) Master Response 6 claims the project would generate 3985 trips and 13,745 Vehicle Trips within the Tahoe Basin. The DEIR failed to analyze the cumulative VMTs in the Tahoe basin from all Tahoe and Truckee projects.

Master Response 6 claims since the project is not in the Tahoe Basin, "effects on the TRPA thresholds are not used as standards of significance in this EIR (although, physical effects on the Basin are evaluated, where applicable)." FEIR master response further states the following, "Historically, TRPA posited that more VMT would result in increased traffic congestion, increased nitrate loading into the atmosphere (and subsequent deposition into Lake Tahoe), and an increase in the airborne concentration of particulate matter known to adversely affect regional and sub-regional visibility and human health (TRPA 1982). TRPA has adopted a threshold standard that requires TRPA to reduce VMT in the Basin by 10 percent of the 1981 base year values, equivalent to 2,067,600 VMT, as indicated by a peak travel day, generally represented by a summer weekend (TRPA 2012). Again, although the project site is not within the Tahoe Basin and not subject to the environmental standards of the TRPA, the project boundary abuts the Basin boundary, and project-generated trips would contribute to in-Basin VMT. On a peak travel day, the project would generate approximately 13,745 VMT within the Tahoe Basin. Total VMT in the TRPA boundary was estimated in the Regional Transportation Plan (TMPO and TRPA 2012) to be 1,984,600 for summer 2010 conditions. Based on this benchmark, which is considered the best available data, the project would result in an estimated 0.7 percent increase in VMT within the TRPA boundary. The TRPA environmental threshold carrying capacity threshold calls for the Tahoe Region's VMT to be at least 10 percent below its 1981 level, or 2,067,600 VMT. The addition of the project's VMT to the 2010 summer value would result in 1,998,345 VMT, which would remain below this VMT threshold. Data used to develop the project-generated VMT estimates is included herein as Appendix O."

Using the DEIR's own figures and calculation, the Lake Tahoe Basin could only absorb 5 more projects of this size without exceeding the Basin's VMT threshold. Considering all the other cumulative projects in Tahoe and Truckee (Boulder Bay, Homewood, Highlands II and III, Railyard, Joerger Ranch, Squaw Valley) it seems clear that the Basin's VMT has already been exceeded. The DEIR must account for the total VMTs generated from these projects. PF13-5 cont.

4.The DEIR Fails to adequately Analyze and mitigate the Project's Impact on Biological Resources. PF13-6

The DEIR states that:

* 536 acres of habitat will be disturbed (table 7-7)
*30,000-plus trees will be removed (Appendix E Tree Summary)
*70-plus units will be built next to a flood plain habitat (Ex. 9-26)
*80 acres of development will occur on very severe and severe erosion soil (Table 14-3)
*11 million square feet of soil will be disturbed by development (Table 14-3)

The DEIR improperly compares the disturbance of 11m sf of soil and loss of 30k trees by comparing that impact to all the existing forest in the region.

"Ex. Summary p.2-16 Impact 7-1: Disturbance or loss of common vegetation communities and wildlife habitats-

Under the MVWPSP, up to 536.5 acres of common vegetation communities and wildlife habitats could be permanently converted to single family residential, multi-family/residential cabins, and neighborhood commercial uses on the West Parcel, and removed to construct the main access road and the EVA road. Additional disturbances to common habitats would occur as a result of constructing and maintaining the proposed offsite utilities. Because these habitats are locally and regionally common and abundant, the proposed project would not substantially reduce the size, continuity, or integrity of any common vegetation community or habitat type or interrupt the natural processes that support common vegetation communities within the MVWPSP project site. "

5. The DEIR fails to adequately analyze or mitigate the project's significant Visual Impacts. PF13-7

The DEIR's Visual Simulations do not show the severity and extent of the project's Visual Impacts. The DEIR admits that it failed to analyze and provide a simulation of the visual effects of cumulative proposed development (comments 1031-22) such as Highlands II, Northstar Mountain Master Plan and the Brockway Campground. Although a man standing on large areas of the project site can see Lake Tahoe without potential infrastructure, defensible space and build-out, the DEIR continues to claim no structures will be visible from Tahoe. The photo below was taken from a drone at 75' (height of condo buildings) from road 73-B onsite at the southern boundary.

Ex summary impact 9-1 adverse effects on scenic vistas-
"Portions of the development on the West Parcel development area would be within scenic vistas that are visible from Martis Valley and Northstar. ... No structures would be visible from Lake Tahoe, and tree removal visible from Lake Tahoe would be largely obscured by remaining trees and nearly imperceptible." If you can see Lake Tahoe, considering 11m sf of site disturbance and defensible space, Lake Tahoe can see you. See (Ex. H USB Drive drone video and power point)
Also, the DEIR fails to analyze the impact of the huge 550 space Brockway Campground's cumulative scenic impact claiming:
Ex summary impact 9-6 cumulative effects on scenic vistas-"The Brockway Campground Project is in the preliminary planning stages, so the impacts to scenic vistas are not known. If the Brockway Campground Project did result in significant cumulative impacts to scenic vistas, the MVPSP would not make a considerable contribution to those impacts because it is not visible from the areas from which the Brockway Campground improvements might be visible, such as Fibreboard Freeway." This statement demonstrates the DEIR's refusal to make any substantive analysis of scenic impacts. PF13-7 cont.

6. The DEIR fails to conduct an adequate impact analysis associated with the risk of wildfire. PF13-8
Cumulative impact of Martis Campground and Martis Valley West must be considered together as they combine to increase impact to (i) evacuation and (ii) fire risk.

See Expert Opinion attached: Bear Berkeley and Research Inc Comments attached Ex. I and Ex H. USB Drive Project Draft Emergency Evacuation Plan and LSC Evacuation time analysis)

7. The DEIR's analysis of Project Alternatives is inadequate. PF13-9

Despite our requests, the County failed to examine a reasonable range of alternatives because the County failed to examine any higher density, clustered development or smart growth alternative off the ridgeline on the West Parcel which would reduce the project footprint while meeting the objectives.

8. The DEIR's fails to adequately analyze cumulative impacts. PF13-10

The DEIR's analysis summary simply deferred the cumulative analysis to local agencies on individual projects, thereby abdicating their responsibility. Executive Summary Impact 5-6
"Because individual projects would be reviewed by land use agencies in the context of their particular general plans, zoning ordinances, codes, and other guidance documents prior to approval and implementation, resulting alterations of land use would be in accord with, and would implement the vision of each community. The cumulative impact would be less than significant."

DEIR Table 4-2 (attached) fails to accurately reflect existing and proposed development in the following ways:

a. Northstar Highlands II should include Northstar III. Per Placer planner Paul Thompson it should reflect 1450 units or perhaps 824 but the table only claims 446. (email Placer planner Paul Thompson) or 824 (Placer Approval Aug. 23, 2011). (See Ex. J and K) PF13-10 cont.
b. Boulder Bay is 348 units, not just 275 room hotel.
c. Truckee Railyard although a large project it reflects no units on Table 4-2
d. Northstar Mountain Master Plan fails to disclose 7500 sf lodge, campground and parking lot proposed adjacent to MV
e. **www.placer.ca.gov/.../NorthstarDEIR3-ProjectDescription.pdf "3.0 Project Description** The third skier service site includes relocation of the existing cross-country ski center, located east of the Vista Express chairlift bottom terminal, to the area south of Sawmill Lake. Their located cross-country center/skier service site would include an approximately 7,500-squarefoot lodge offering limited food service with seating, restroom facilities, and a 20-space parking lot. Utilities to the site would be extended from existing utilities located within Highlands View Drive and the mid-mountain area."

In summary, for each of these reasons, the NTPA, respectfully request that Placer County as the lead agency distribute a technically and legally adequate DEIR for the Public review and comment that fully complies with the law and is supported by substantial evidence in light of the whole record. PF13-11
CEQA Guidelines 15088.5

Respectfully Submitted,

Ann Nichols

Ann Nichols
On behalf of the North Tahoe Preservation Alliance.

Enclosures

EXHIBITS

Exhibit A

Two Change.org petitions

1. "Tahoe Regional Planning Agency: Establish enforceable ridgeline protections in the Lake Tahoe area" which garnered 1559 supporters and
2. "Placer County Board of Supervisors: Remove Tahoe Basin portion of Martis Valley West project" which received 3,327 supporters.

Exhibit B

Terrain Analysis map of Brockway Campground-DEIR must provide one for MVW

Exhibit C

DEIR Area Study

Exhibit D

Conceptual Land Use Map

Exhibit E

DEIR Evacuation Route

Exhibit F

Joy Dahlgren Traffic Expert Comments

Exhibit G

Commercial Vacancy Survey

Exhibit H

USB Drive Files

Exhibit I

Bear Berkeley and Research Inc. Fire Expert Comments

Exhibit J

Cumulative Inventory from DEIR with projects starred for error or omission

Exhibit K

Email from Paul Thompsons at Placer re: # of units at Highlands II and Placer approval of Highlands II and III

EX A

preserve@ntpac.com

From: preserve@ntpac.com
Sent: Sunday, May 29, 2016 9:42 AM
To: 'Eugene Wilson'
Cc: 'Coral Amende'
Subject: RE: Petition signatures

We

Have color copies of the text of the two petitions.

1.

Tahoe Regional Planning Agency: Establish enforceable ridgeline protections in the Lake Tahoe area

- by Save Tahoe Forests
- 1,559 supporters
- Sign
- Share

2.

Placer County Board of Supervisors: Remove Tahoe Basin portion of Martis Valley West project

- by Save Tahoe Forests
- 3,327 supporters
- Sign
- Share

Establish enforceable ridgeline protections in the Lake Tahoe area

Save Tahoe Forests United States

Save Tahoe Forests
United States

1,576
Supporters

The "Martis Valley West" proposal by East West Partners and Sierra Pacific Industries has exposed the lack of any definitive standards by the Tahoe Regional Planning Agency or Placer County for the protection of the area's scenic forested ridgelines. The ridgelines in the Lake Tahoe area are one of its most outstandingly beautiful features and are a primary basis for its popularity and economic health. The ridgelines offer recreational opportunities, a chance to view wildlife and experience nature, and of course unparalleled views of Lake Tahoe and Martis Valley; they are also increasingly rare homes to and open-space corridors for wildlife.

Most towns that have any kind of scenic value protect their ridgelines. There are many more than can be mentioned here, but they include Nashville, Tennessee; Sun Valley, Idaho; Park City, Utah; Aspen , Colorado; and Santa Monica, California. If regulations banning ridgeline development exist in other areas, even those that don't have the outstandingly unique features of the Lake Tahoe area, why don't we?

The public has entrusted Placer County and the TRPA with protecting and preserving Tahoe's and Truckee's irreplaceable natural beauty and mountain environment. Vague and unenforceable references in regulations to "consider" ridgeline protections clearly aren't enough. By signing this petition, we are requesting that you institute clear and enforceable protections for the Tahoe area's ridgelines immediately.

This petition will be delivered to:

- Tahoe Regional Planning Agency
- Placer County Board of Supervisors and TRPA

Read the letter
Letter to
Tahoe Regional Planning Agency
Placer County Board of Supervisors and TRPA

The "Martis Valley West" proposal by East West Partners and Sierra Pacific Industries has exposed the lack of any definitive standards by the Tahoe Regional Planning Agency or Placer County for the protection of the area's scenic forested ridgelines. The ridgelines in the Lake Tahoe area are one of its most outstandingly beautiful features and are a primary basis for its popularity and economic health. The ridgelines offer recreational opportunities, a chance to view wildlife and experience nature, and of course unparalleled views of Lake Tahoe and Martis Valley; they are also increasingly rare homes to and open-space corridors for wildlife.

Most towns that have any kind of scenic value protect their ridgelines. There are many more than can be mentioned here, but they include Nashville, Tennessee; Sun Valley, Idaho; Park City, Utah; Aspen , Colorado; and Santa Monica, California. If regulations banning ridgeline development exist in other areas, even those that don't have the outstandingly unique features of the Lake Tahoe area, why don't we?

The public has entrusted Placer County and the TRPA with protecting and preserving Tahoe's and Truckee's irreplaceable natural beauty and mountain environment. Vague and unenforceable references in regulations to "consider" ridgeline protections clearly aren't enough. By signing this petition, we are requesting that you institute clear and enforceable protections for the Tahoe area's ridgelines immediately.

OK

Save Tahoe Forests started this petition with a single signature, and now has 1,576 supporters. Start a petition today to change something you care about.

Petitioning Placer County Board of Supervisors and 1 other

Remove Tahoe Basin portion of Martis Valley West project

Save Tahoe Forests United States

We are signing this petition to voice our opposition to the proposal by East West Partners and Sierra Pacific Industries to create a massive new development that includes 112 acres currently zoned forest/conservation inside the Tahoe Basin.

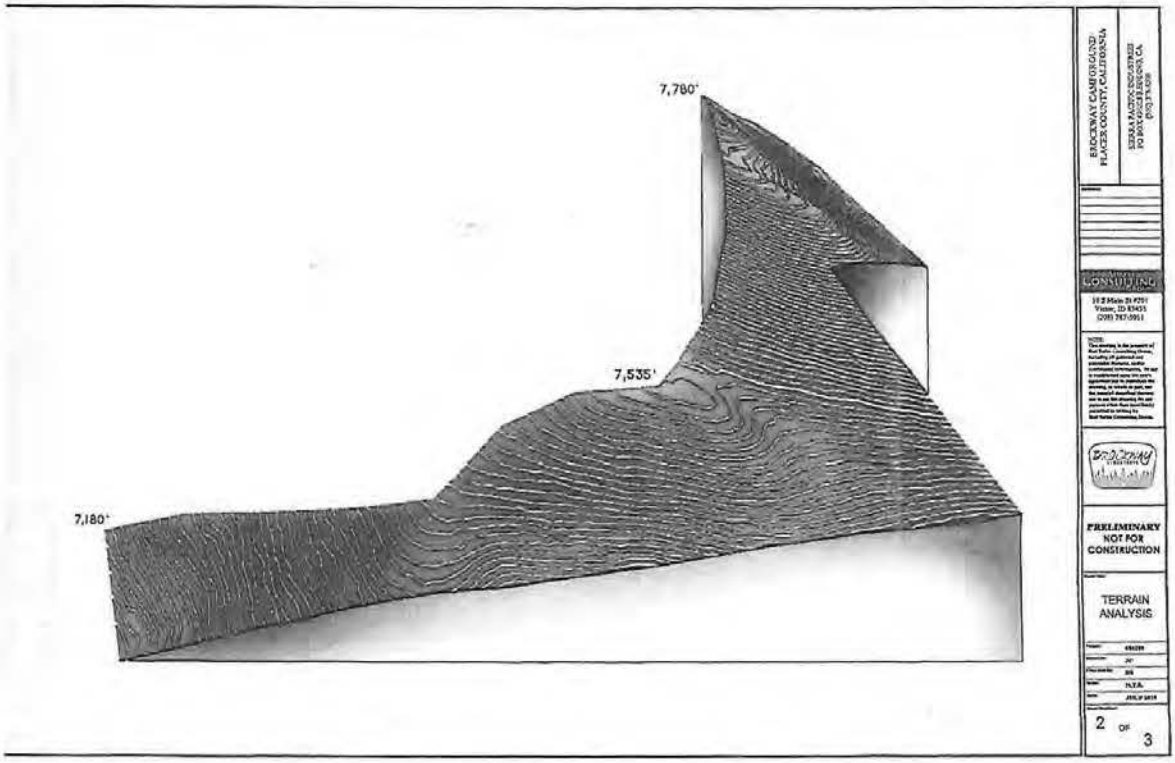
The Tahoe Regional Planning Agency's most recent Regional Plan Update proposes to protect the Basin by, among other things, concentrating new development in urban Town Centers – areas that already have services such as schools, hospitals, banks, retail stores, and so on, plus infrastructure such as roads, sewer, water, and utilities. Building on undeveloped forest land miles from any services is in direct contravention of this goal.

The public has entrusted Placer County and the TRPA with protecting and preserving Tahoe's irreplaceable natural beauty and mountain environment. Please do not waste taxpayers' time and money on staff review of this proposal, which would allow the wholesale destruction of a forested ridgeline and further contribute to environmental degradation in the Tahoe Basin.

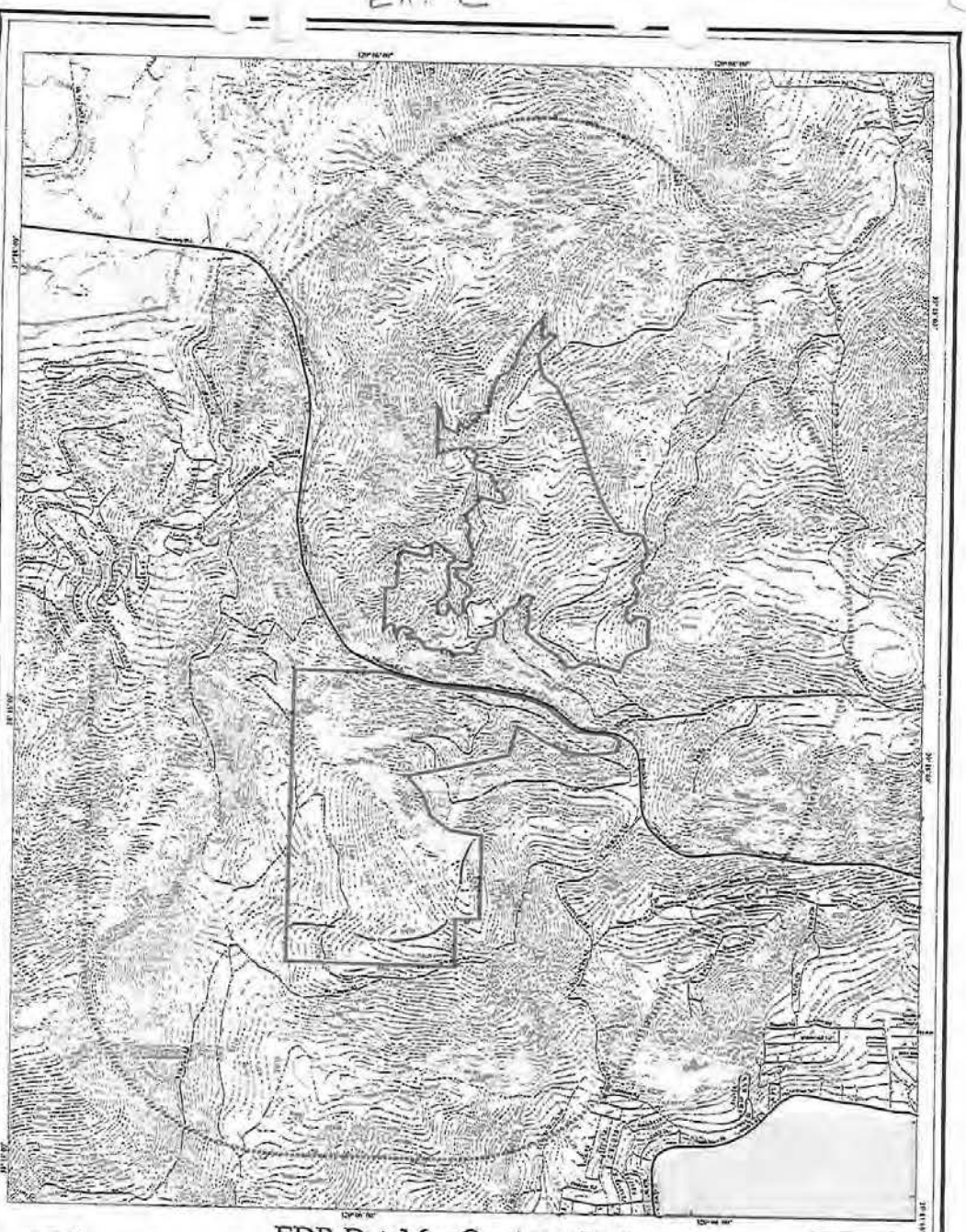
We strongly urge you to remove the 112 acre Tahoe Basin Area Plan proposed development from the Martis Valley West project.

EX. B

B


7,780'
7,535'
7,180'
BADGEWAY CAMP (GOLD)
PLACER COUNTY, CALIFORNIA
CONSULTING
PRELIMINARY
NOT FOR
CONSTRUCTION
TERRAIN
ANALYSIS
2 OF 3

EX. C



EDR DataMap® - Area Study

Martis Valley Opportunity

EDR Environmental Data Resources Inc

Truckee, CA

Listed Sites
Earthquake Epicenters (Richter 5 or greater)
Search Boundary
Roads
Major Roads
Waterways
Railroads
Contour Lines
Pipelines
Powerlines
Fault Lines
Water
Superfund Sites
Federal DOD Sites
Indian Reservations BIA
100-Yr Flood Zones
National Wetland Inventory

N

0 1/4 1/2

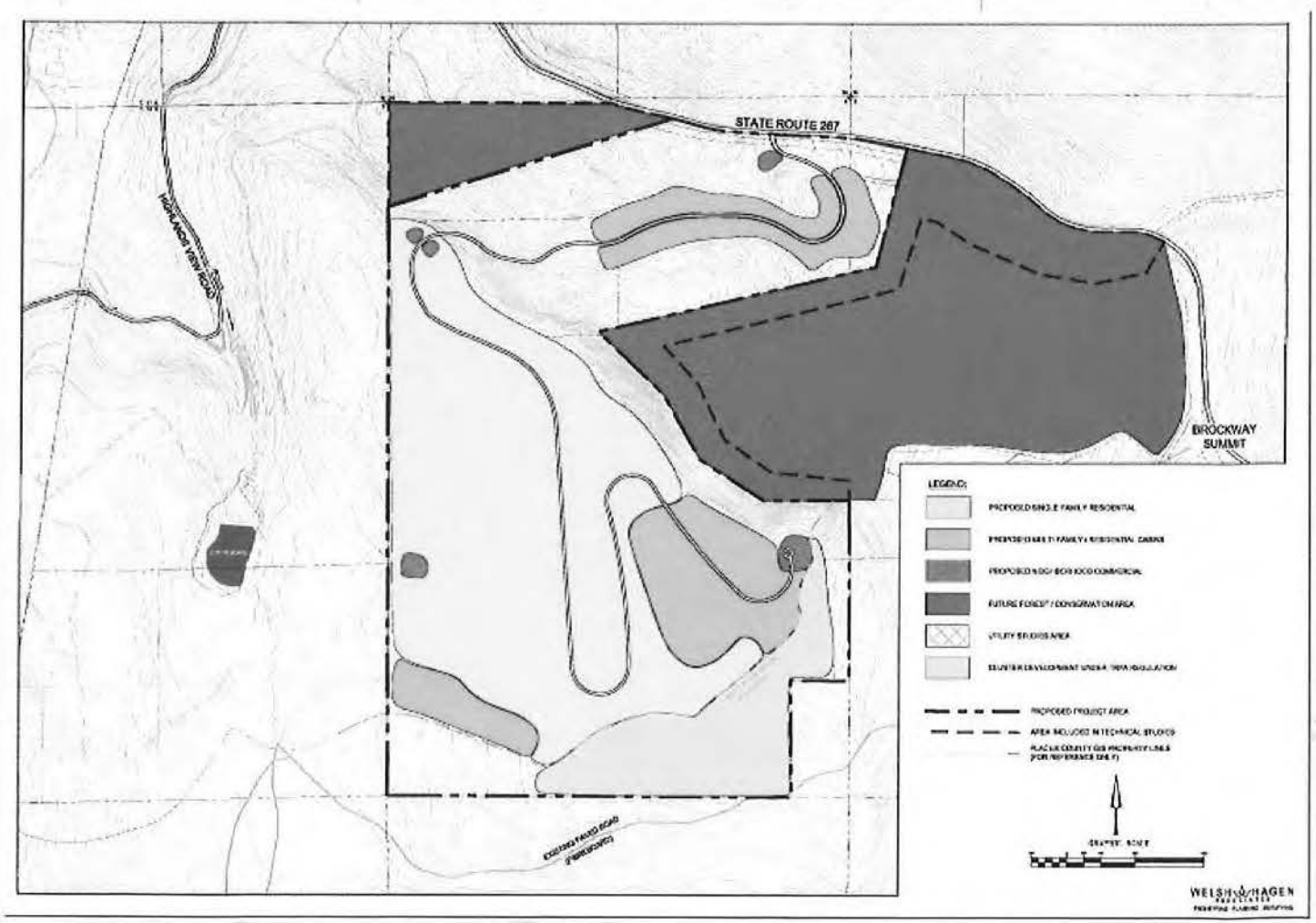
Scale in Miles

EX. D

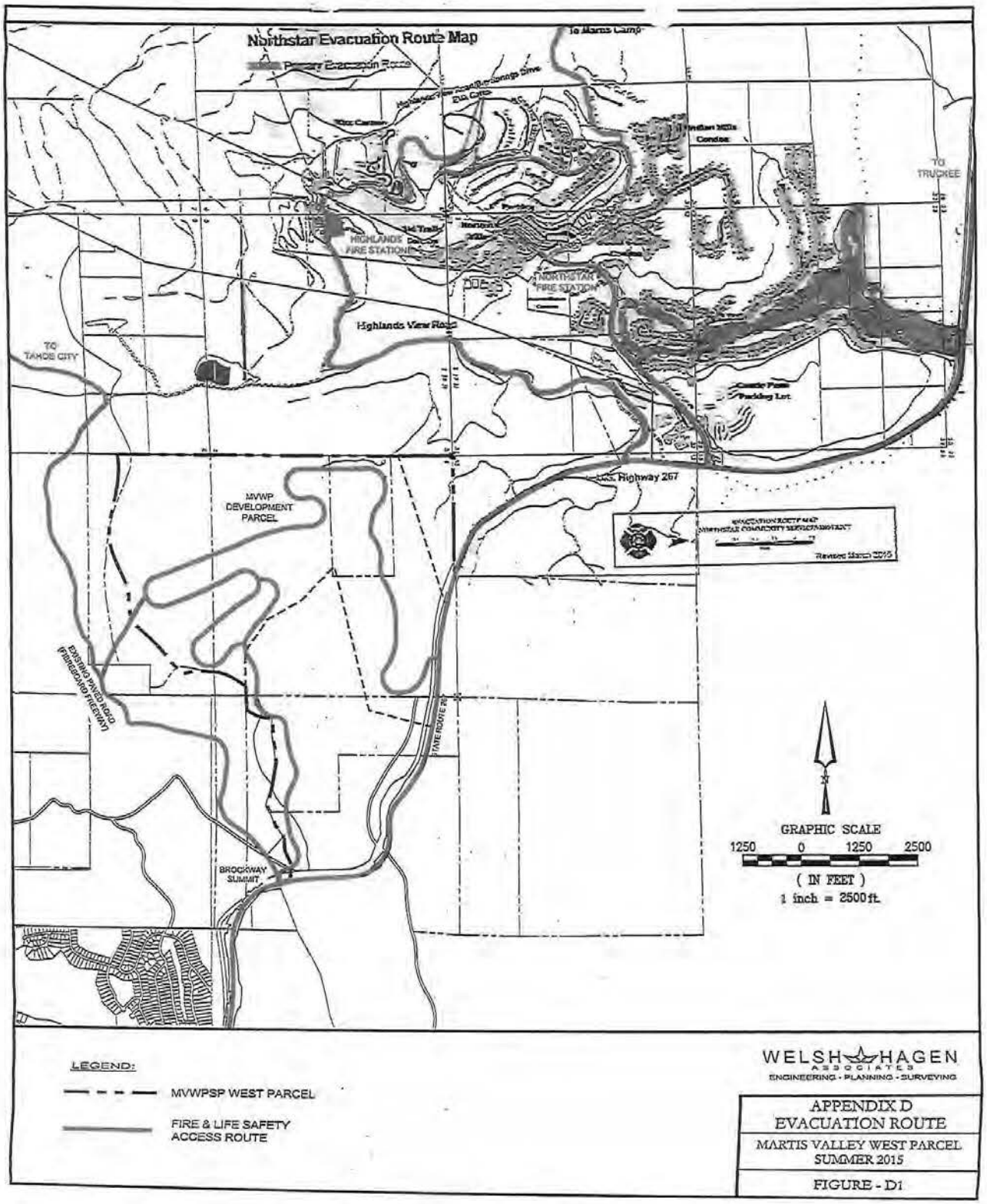
D

MARTIS VALLEY
WEST PARCEL
PROJECT

Conceptual Land Use Plan



EX E



LEGEND:

MVWPSP WEST PARCEL

FIRE & LIFE SAFETY ACCESS ROUTE

WELSH HAGEN ASSOCIATES
ENGINEERING - PLANNING - SURVEYING

APPENDIX D
EVACUATION ROUTE

MARTIS VALLEY WEST PARCEL
SUMMER 2015

FIGURE - D1

EX F

My family has had a cabin in Crystal Bay since 1950, and I have visited Lake Tahoe every year since then. Before I retired I spent over 25 years as a transportation planner and researcher, my last ten years in research at the Institute of Transportation Studies at the University of California at Berkeley. I have a bachelor's degree in Statistics, a master's degree in Public Policy, and a Ph.D. in Civil engineering, all from Berkeley.

As a long time visitor to Lake Tahoe I am very conscious of the steady pressure to profit from its unique beauty and the accompanying danger that over-development will destroy much of what makes it beautiful. Although Martis Valley is outside the Tahoe basin, much of its appeal is related to the lake and as a result it has and will have significant impacts on the lake and the lake on it.

The Martis Valley West project's location on Highway 267, the primary route for travelers to and from the lake, is a major reason that it is a bad idea. Highway 267 is the gateway to the North end of the Lake Tahoe and the Northstar ski area. Most of the time trips generated by the project would have little effect on traffic. But during peak vacation time a high proportion of the project's residences would be occupied and a much larger number of people would be traveling to and from Lake Tahoe. It is the nature of delay that as a road becomes more congested, each additional trip has a larger effect than the previous trip on delay because more travelers are affected and the number of cars that must travel through each bottleneck increases, thus taking each car longer to get through. So during congested periods, even a small number of additional trips can cause large delays. The effect is analogous to the effect of a people cutting into a line to get into a restaurant—the longer the line the greater the waiting time for each person in the line, and the more people are affected. This aspect of delay was not analyzed in the EIR.

The delay analysis in the EIR that was based on the 30th highest peak hour in the winter found that two intersections on Highway 267 and all of the roadway segments from the Placer County line to Highway 28 already operate at unacceptable level of service E (Tables 10-5 and 10-13). The analysis based on the summer peak hour found road segments from Northstar to Highway 28 were also at level E. The projected cumulative levels of service by 2034 *without* the project are at level of service F at three intersections and level F at three road segments and level E at two other road segments during both the winter and summer peaks.

Why does this delay matter? Because it would affect so many people. With long delays they are not escaping urban pressures, but finding new pressures where they go to get away.

Where is the tipping point at which the costs of a development exceed its benefits? In the case of Martis Valley West project, I believe it has already been reached. Not only do people lose

precious vacation time because of the delay, the delay makes the mountain experience more like the urban experience they are traveling to the mountains to escape.

Furthermore, the project would damage the environment. Construction would destroy habitat for wild plants and animals. Once houses and businesses were situated in the forest, there would be periodic road maintenance, brush and tree clearing, and continuing construction of improvements and additions. The area would no longer look wild, regardless of whatever building and landscape restrictions were imposed.

The project also seems wrong in terms of its effects on global warming. There is no way the project could do anything but increase carbon dioxide emissions. Road delay reduces fuel efficiency, leading to higher emissions of carbon dioxide. The production and transportation of materials used in construction and the construction itself produce carbon dioxide. No matter how green the construction, common sense tells us that it would take more energy, and thus produce more carbon dioxide, to build a house than to not build it. Energy is needed to heat, cool, and operate housing and businesses even when they are not occupied or doing business.

Weigh these costs against the benefits: 760 residences and 6.6 acres of commercial development. The EIR assumes that 20 percent of the project population would be fulltime, permanent residents. It assumes 2.5 people per household. So the project would provide permanent housing for only 380 people. The remaining residential units would be primarily second homes and fractional units occupied by seasonal and/or transient visitors. This would benefit the people who stay in the units. But there does not seem to be a shortage of such accommodations at Tahoe or in the region. Looking to the future, and the possible decline of snow sports due to global warming, does a project whose main attraction is proximity to a ski area makes sense.

The benefits seem quite paltry relative to the costs. Why should a change in use be approved? Martis Valley West should remain a timber production zone.

Forests have been called the lungs of the world because they absorb carbon, thus reducing greenhouse gases. In the long term, they also provide lumber.

Sincerely,
Joy Dahlgren Ph.D.

EX 5

Area Commercial Space Available						
23-Apr-16						
Project	#spaces	Contact		Location		
The Rock	1	Kaylee Jones	530-582-4623	Martis Valley		
Martis Village	4	Jenny Jessee	530-550-7800	Martis Valley		
White House	1			Truckee	W. River Rd.	
Truckee Business Park	Bldg A	T. Watson	3800-11600 sf	Truckee	W. River Rd.	
Joerger Ranch	new				Hwy 267 new project	
Railyard	new			Truckee	new project	
Truckee Crossroads	1	KIMCO	916-580-2533	Truckee	Hwy 89 Deerfield dr.	
Gateway	2	KIMCO		Truckee	Donner Pass Rd.	
Donner Center	2			Truckee	Donner Pass Rd.	
Donner Park Center	1			Truckee	Donner Pass Rd.	
Donner Plaza	1			Truckee	Donner Pass Rd. /Hwy 89	
Levon Professional Bldge	3	300-1300 sf		Truckee	Donner Pass Rd.	
11250 West River Rd	Bldg	T. Watson		Truckee	W River Rd.	
Llama Ranch	Bldg	T. Watson	4200 sf	Truckee	Donner Pass Rd. /Hwy 89	
Business Park Dr.	1	K. Jones	530-582-4623	Truckee		
Airport Business Center	5			Truckee	Hwy 267	
Town &Country Center	3	T. Watson		Truckee	Hwy 267	
Martis Outlook	1	T. Watson		Truckee	Hwy 267	
Phoenix Bldg	1	T. Watson		Truckee	Hwy 267	
Kings Beach Area						
Layton Bldg.	Bldg			Kings Beach	Hwy 28	empty 18 mos.
Chinese	Bldg			Kings Beach	Hwy 28	
Movie Theatre	Bldg	Bill Waters	916-416-4318	Kings Beach	Hwy 28	

EX # USB

View

STON (F:)

Search KINGST

9 items sele

Name	
Bear Berkely MVW fire comments.pdf	FIRE EXPERT COMMENTS
Change petition basin area.docx	PETITION NAMES
change remove tahoe basin names.pdf	PETITION NAMES
draft emergency evac plan.pdf	DRAFT EVAC.
lsc evac time requirements.pdf	LSC EVAC
Martis Valley West Project.pdf	
MVW EX A-H, J and K.pdf	
Tahoe View Video.mp4	VIDEO
Martis Valley West Project.pptx	POWER PT.

Size:
Date modified:
Availability:
Date created:

315 MB

EX I

BERKELEY
AND RESEARCH
INC

May 2, 2016

COUNTY OF PLACER
Community Development Resource Agency
Michael J. Johnson, AICP
Agency Director

Subject: Comments on the Martis Valley West FEIR Document of May 3, 2016

The undersigned are fire safety professionals who have been involved in fire safety engineering and fire protection engineering matters for more than 25 years each.

We have been retained by The North Tahoe Preservation Alliance (NTPA) to comment on the treatment of fire safety related aspects of the Final Environmental Impact Report (Final EIR) for the Martis Valley West Project Specific Plan (PGPA 20130080), State Clearinghouse No. 2014032087, released by the county on May 3, 2016.

NTPA is a Nevada Nonprofit corporation formed in 2008 to ensure that North Lake Tahoe retains its natural beauty and easygoing, rustic lifestyle. Its Board of Directors includes long time Tahoe residents and property owners.

Concerning the commenters, Dr. Zicherman is a fire scientist who began work with wildland and wildland urban interface fire problems in the 1980's when he was a co-author of the East Bay Regional Park District "Blue Ribbon" report regarding a fire incident prior to the Oakland Hills Fire, which in effect predicted the occurrence of that fire and identified the potential for the massive damage which subsequently occurred. More recently he authored the technical and cost benefit studies submitted by the Office of the California State Fire Marshal in support of the California Building Code Chapter 7A regulations which regulate fire safety related construction features of buildings built in State Responsibility Areas (SRA's) of California. Most recently he has been part of teams studying the origin and spread of the Valley and Butte fires of fall 2015 in Lake and Amador Counties, respectively.

Mr. Alber is a licensed fire protection engineer that has worked in the public and private sector addressing fire safety problems and design issues in situations ranging from high rise hotels through wildland and wildland urban interface problems. For the past 15 years, he has served as the Marin County Fire Marshal. In this role, Part of his responsibilities

include evaluating fire apparatus access and evacuation routes, vegetation management and defensible space plans, preparation of the Marin County's Unit Fire Plan and Community Wildfire Protection Plan (CWPP), and review of ignition resistant construction systems/assemblies for planned residential development. Resumes of both signers of this document accompany this letter.

We are writing to comment on the content of the final EIR currently undergoing review and public comment for the Martis Valley West Project. This project is proposed for Placer County at a location adjoining the Northstar Community and ski area. It is the objective of this letter to focus on the characteristics of the review process and the findings of the FEIR document, which has substantial impacts on fire and life safety issues associated with the subject proposed project, as well as the proposed Brockway Campground Project. The latter project would directly adjoin the Martis Valley West residential project and utilize identical access and emergency features.

1. ***Holistic nature of this process***: Review of environmental impact reports as they have evolved in the State of California is highly formalized under CEQA guidelines. Consistent with this, the Martis Valley West FEIR report released May 3, 2016 is quite voluminous and consists of many pages of documentation, citations from litigations and other reporting sources. However, the *summary results* are not very clear and are definitely lacking in specificity on critical issues such as forest fuel management.

   In particular - to those of us who are not environmental attorneys - the bifurcation of the Martis Valley West residential project from the planned Brockway Campground based on (1) the technical data on traffic flows added days before the FEIR was issued and (2) the administrative logic presented are not - from fire or emergency safety perspectives - logical. [1]

   The FEIR appears to reach the conclusion that under CEQA Martis Valley West and the Brockway Campground should/will/can be considered separately in terms of environmental impacts each pose. This would be a bad decision based on incorrect assumptions.

   The cumulative impact of Brockway Campground and Martis Valley West must be considered together because they combine to increase impact to both (i) evacuation issues and (ii) fire risk issues and the impacts of each project separately are irrelevant to the final configuration being proposed for the two bi-furcated projects.

   The two projects comingle impacts on (i) emergency egress and evacuation issues and (ii) fire risk present in these contiguous properties.

   Both projects - adding the Brockway Campground Project to the arguments - have the following features:

1

The reference "LSC-2016" (see PP 3-39) provides "additional analysis" on evacuation flows and times. It is dated 5/26 and was *NOT* included with reference materials available at the Placer County website initially. See additional detailed comments on items LSC-2016 (memo to Kurt Krieg....) and the "LSC.pdf" of May 2, 2016 document entitled Emergency Preparedness and Evacuation Plan (**DRAFT**).

A. Both rely on Highway 267 for primary egress and access including emergency responder access
B. Both have issues of forest management and the implicit threat of wildfire weighing heavily on potential for emergencies.
C. Taken together, the projects will account for the addition of several thousand permanent and transient occupants to the currently undeveloped wilderness with all of the attendant risks...

Therefore, there is no logic nor societal benefit in not considering the overall impact of the projects jointly whether or not the reviewing agencies are a county agency and or a regional planning agency

The points we raise and comment on here are consistent with the positions taken by the local fire departments, which will have to face these problems on the ground.

Conversely, comments from state level fire safety agencies, while well-intentioned and administratively correct, citing for example conformance with Public Resources Code (PRC) 4290 and 4291, include the prescriptive and implicit requirements for conformance with state law. However, and most importantly, they lack explicit content such as the Northstar Fire Department's comments calling for specific treatments of brush and other naturally occurring fire hazards. Unmitigated brush poses an ongoing threat as ladder fuels which act as a vector in transitioning ground fire into crown fire, with the latter being orders of magnitude more hazardous than aground fire.

Likewise, the State agency's comments lack the specificity of the North Tahoe Fire Protection District on the "*already insufficient*" traffic conditions on Hwy 267.

It is for these reasons that we request that the county consider this review as a holistic process involving the campsite development, highway access and development of a residential project in a wildland area. As such, the public use will include permanent residents in a housing development, temporary residents at the Brockway Campground location and a wide range of transient's moving between Lake Tahoe and Interstate 80. Recall that today, in the absence of any of these changes, Highway 267 is already saturated on weekends, on holidays and at times when the ski season is in full bloom, or when summer visitors to Lake Tahoe create large volumes of traffic.

2. *Quality of report and data sources and availability for review*: The report quality is at best pedestrian.

As an example, page 18-6 of the FEIR document in paragraph 6 includes the phrase "wildlife prevention strategy." This obviously should read "wild*fire* prevention strategy" and the current language suggests – at the least – a lack of attention to the final copy of the report.

The report also cites Citygate Associates repeatedly, seemingly as a reference that might be found in a peer reviewed publication. However, Citygate Associates is the County's consultant and its role as a disinterested party is not clear. Likewise, comparison of the Martis Valley West FEIR document with a similar one issued recently for a similar development at Squaw Valley makes one question the

thoroughness in preparing these documents and a somewhat "cookie cutter" similarity in style and content.

There is also the matter of the reliance on and availability of reference "LSC – 2016" cited on page 3.39 of the Master response section of the FEIR in support of the traffic flow conclusions and its relation to the Emergency Preparedness and Evacuation Plan (**DRAFT**) which provides essentially identical evacuation time estimates but was prepared before the additional analysis document was created.

This memo, by LSC Transportation Consultants, Inc. is dated April 26, 2016 approximately a week before the FEIR was made available to the public. It is apparently intended to provide major support to the report's conclusion relating to suitability of evacuation times. However in undertaking our review we discovered that it was not available at the Placer County website and it was made available only after extensive searching of that website and two requests having been made to the county.

Given that the report was prepared well after essentially identical conclusions were presented in the PEIR one has to wonder about the basis for the conclusions on evacuation times. Looking more closely at the report itself it is clear that there is no data included nor any treatment of evacuation that would need to take place during a fire emergency from the planned Brockway Campground location.

The following points are critical regarding the "emergency evacuation" analysis presented in the FEIR:

Fire Safety Science Issues -

- 1.5 hours (the evacuation time) is a particularly long time in the face of a serious wind driven fire event. The Angora Fire, well known to Tahoe Area Residents moved thru its community quickly and the Valley Fire in Lake County in Fall 2015 move across the entire county in a few hours during a single afternoon. Wind driven fires cover distances with essentially no notice beforehand to exposed citizens. The assumption that 1.5 hours will be available for complete mobilization and evacuation provides NO margin of safety even under the best of circumstances.
- The rate at which forseeable fires/flame fronts advance under a conservative fire scenario for the subject sites is not addressed anywhere in either the analyses presented by LSC to the County/Clients, the 5/6/2016 evacuation *draft* or the 4/26 memo.
- No data whatsoever is provided that even considers fire behavior specific to the MVW and Brockway Campground locations.[2] Scenario based conclusions considered *must* address worst case conditions and with both entities (MVW and

[2] Such variables include wind speeds, wind direction, humidity and fuel moisture content considerations, topography, time of day, fuel loadings (including brush factors) present in the target areas.

Brockway Campground) contributing evacuees. The analysis suggests that all residents are notified at the same time of an approaching fire. The assumption is apparently that all residents are notified Traffic Analysis Considerations:

Traffic Analysis Considerations:

- A single analysis was run to "confirm" the conclusions presented earlier in the DEIR. The initial statement under "Evacuation Scenario Assumptions" states " There are a myriad of scenarios that could be envisioned." By running a single scenario neither the sensitivity of the analysis could be assessed by a peer reviewer nor could any range of possible environmental factors effecting evacuations be considered. This is a fatal flaw in the LSC conclusions
- There are numerous models available and "Synchro 8" is user friendly software but not well suited to evacuation modeling under emergency conditions. For example, Vissim would probably be the *proper* modeling tool for evacuations – vehicles and/or pedestrians.
- Consider the effects of a family van which is towing boat trailer with the trailer turning over and blocking the evacuation route. How is/was such a condition covered in any analysis conducted?
- Analysis suggests that employees controlling traffic are sufficiently trained and know what to do, and aren't trying to get out of the area themselves.
- Depending on the extent of the fire, what about the contribution to traffic on 267 resulting from other communities (Such as Northstar) that may be evacuating at the same time?
- What is the person sitting at the end of queue going to do as embers and smoke start to drift across the road? There's rarely anything orderly about evacuations in the archival footage of wild-land fire emergencies.

The assumptions made and the analyses actually conducted did not include relevant, necessary scenario related information nor were extremes in fire behavior or human behavior and random events considered.

The evacuation analysis conducted is fatally flawed at all levels and of should not be considered as valid in any deliberations.

3. *Access Issues:* it is well known that Highway 267 experiences significant congestion currently in the Brockway Summit area where the project is located both during the winter ski season and also the summer tourist season.

   However, in the report section "EMERGENCY PREPAREDNESS AND EVACUATION PLAN" beginning on pp. 3.38 and moving to 3.39 of the FEIR Master Responses the following conclusion is presented:

   > "Based on the analysis and the assumptions used, it is estimated that it would take approximately 1.3 hours for all vehicles to exit the MVWPSP project site under existing plus project conditions and 1.5 hours under cumulative plus project conditions. These estimates represent the time required for the last vehicle to evacuate the MVWPSP site."

The finding in the FEIR is that traffic conditions on Highway 267 are adequate for foreseeable emergencies during and after MVW is developed.

As such, in unchanged configuration, that highway is judged adequate to provide primary access for first responders as well as egress for all affected occupants of both of the proposed projects, as well as transients traversing the Brockway Summit highway from the north or south coming and going from Lake Tahoe and the Truckee areas.

The FEIR report does list a contribution from the developers towards the improvement of Highway 267 access but the number of dollars included is in no way representative of the costs to modify Highway 267 to allow for higher traffic volumes. That project itself would require significant environmental review and suggests that access and highway capacity are a true regional issue that needs to be addressed rather than simply approving the building of a new housing development.

In addition, as commented on in considerable detail by the North Tahoe Fire Department, the access conditions and capacity of Highway 267 are "already unacceptable." In addition, secondary access issues related to the Fiberboard Freeway need to be addressed through development of comprehensive fully paved access roads. These comments from local fire officials who have intimate, "on the ground" knowledge of the area, have largely been ignored in the final EIR conclusions.

In addition, as commented on in considerable detail by the North Tahoe Fire Department, the access conditions and capacity of Highway 267 are "already unacceptable."

As noted above, the County's consultants have reached an opposite conclusion based on FLAWED assumptions and incomplete evaluations.

In addition, second emergency access routes suggested as being reliable by the County's consultants via to the Fiberboard Freeway need to be further addressed through development fully paved secondary access roads.

The preceding comments referred to, coming from local fire officials who have intimate, "on the ground" knowledge of the project site and surrounding area, have been ignored in the final EIR conclusions.

There is nothing more important during a wild-land fire incident than maintaining access when the lives of thousands of civilians are potentially at risk. Examples of this abound in terms of evacuation traffic jams as we have seen in the news reports associated with the on-going Fort McMurray, Canada fire.

Likewise, disorientation of drivers - even those familiar with local roads - has led to civilian deaths as documented in the Oakland Hills Fire and other WUI fire incidents since then.

Historical data - both in formal after-action reports of such fire incidents and available news accounts – adoption of more conservative approaches to life safety than is proposed in the FEIR.

All of this is not consistent with the County's consultants assessment that no problems exist with the draft emergency access and egress plans. The solutions proposed in the FEIR for both primary and secondary access to the proposed projects are inadequate based on probable fire emergency scenarios. This statement is not based on scenario driven "what-if" treatments of potential problems, but are based on the performance of egress facilities at similar projects elsewhere.

In these cases, provisions to either provide "shelter in place safety" for occupants *or* safe egress for occupants in situations without the potential for shelter-in-place safety - such as fir occupants of the proposed Brockway Campground have not been developed but are certainly warranted.

4. *Forest fuels issues:* The two-page set of comments from the Northstar Fire Department on the original draft of the EIR were eloquent in their simplicity and in their call-out for *specific plans for brush clearing, fuel management and maintenance of defensible space.*[3] Conversely, there is little if any specificity in the FEIR as to generalities in referring to fuel management, mitigation of fire hazards posed by existing brush loads and even less relating to their management in the future.

In addition, while the Northstar Fire Department comments did refer to community wild fire protection planning (CWPP), there is no specificity as to the triggering and timing of such activities following potential approval of the EIR.

Conversely, there are references to the use of homeowner dues for trail maintenance and recreation amenities. A holistic approach to the maintenance of fire safety levels within the project would be well served by an addition to the CCR'S proposed for the project to include required support for and certification under the National Fire Protection Association's affiliated "Fire-wise" program. Preplanning of the community to include areas of refuge to assist in mitigating the egress problems of the project in a fire related emergency should also be addressed.

In addition, while the Northstar Fire Department comments did refer to community wild fire protection planning (CWPP), there is no specificity as to the triggering and timing of such activities following potential approval of the EIR. CWPP is an essential component of development of residential facilities in wild-lands and effective community wild fire protection planning provides substantial environmental benefits in terms of fire protection, wild life habitat, water quality and other factors.

Conversely, there are references to the use of homeowner dues for trail maintenance and recreation amenities. A holistic approach to the maintenance of fire safety levels within the project would be well served by an addition to the CCR'S proposed for the project to include required support for and certification under the National Fire Protection Association's affiliated "Fire-wise" program. As such Preplanning of the community to include areas of refuge to assist in mitigating the egress problems of the project in a fire related emergency remains unaddressed in the FEIR.

[3] These are reproduced as an attachment to this letter for the reader's reference.

This is another fatal flaw in the current version of the FEIR since under CEQA a significant impact to the environment, such as flawed provisions to manage exposed citizens in emergancies that have been demonstrated must be mitigated.

5. ISO (Insurance Services Office) Property Insurance Issues at Martis Valley West:

Returning to the concept of a holistic treatment of the Martis Valley West residential project it is seemingly out of scope to consider issues effecting home-owners insurance availability. However, positions taken recently by insurance carriers for structures in areas near such the proposed for Martis Valley West project *are* relevant. For reference purposes, ISO determines the relevant protection class for a building [essentially fire insurance rating] on a parcel by parcel basis. Thus each building parcel in any project is treated individually.

In the Martis Valley West project, all proposed parcels will be more than 5 miles from the nearest station. These will automatically be rated a "9" – a very low rating - under ISO rules. *A rating of "10" is the lowest possible rating!*

It doesn't matter how much a building is fire hardened, how much defensible space or water are available. As such, it will be very difficult for those homes to get insurance.

This is consistent with large numbers of "turn downs" in the Lake Tahoe area of fire insurance applications and requests for renewals of insurance. Such practices are a reflection of conditions occurring on the ground historically. These turn-downs are not trivial or they are certainly related to anticipated fire performance of the residential proposal being reviewed here.

Such turndowns also call into question the sprawl potentially created by this development project, the need for better evacuation or shelter in place provisions at the proposed project reflect a lack of long term vision to harm to the environment if the project to go forward in its present form.

In its current form as proposed and commented on in the FEIR, the project as configured should be rejected. The FEIR identifies several significant negative impacts of the development, without offering adequate mitigation measures to address the damage these issues will cause to the environment.

We strongly recommend that the county return the project application in its current form to protect the public.

Joseph B. Zicherman, Ph.D., SFPE

Scott Alber, PE, MIFireE

Scott Alber (JZ)

ACCOMPANYING DOCUMENTS: Comment letters NorthStar FD, NTFD

Table 4-2 Cumulative Projects List

Project Name	Location	Description	Residential Units and/or Non-Residential Area	Project Status
Verizon Wireless Brockway Summit Cell Tower	Martis Valley off of SR 267; Assessor's Parcel Number 110-060-062; on Sierra Pacific Industries property; on the West Parcel of the proposed MVWPSP	Proposed wireless facility with a 115-foot-tall monopine tower, 12 by 12-foot shelter, and 50 kilowatt propane generator within a 30 by 40-foot lease area	—	Application submitted in May 2015.
Brockway Campground	Martis Valley off of SR 267 between the Town of Truckee and the north shore of Lake Tahoe; 104 acres within the Lake Tahoe Basin, directly adjacent to the proposed MVWPSP area	Approximately 550 campsites composed of a mix of tent sites, camper sites, and eco-shelters with accessory facilities and amenities	Up to 552 campsites	Application submitted July 2015.
CalPeco 625 and 650 Electrical Line Upgrade	24.1 miles of power line from the Town of Truckee to Kings Beach, and from Kings Beach to Tahoe City	Upgrade of CalPeco's existing 625 and 650 electrical power lines and associated substations	—	Final EIS/EIS/EIR released in September 2014; document certification and project approval in April 2015.
Placer County Tahoe Basin Area Plan	That portion of Placer County within the Lake Tahoe Basin and under the jurisdiction of TRPA.	Placer County-initiated update to its land use regulations that apply in the Lake Tahoe Basin; would update the existing community plans, general plans, plan area statements (PASs), maps, and ordinances in the project area; would implement the 2012 Regional Plan and conform to the TRPA/Tahoe Metropolitan Planning Organization (TMPO) Regional Transportation Plan/Sustainable Communities Strategy; no changes to regulations, policies, or standards in Plan Area Statements 013 (Watson Creek), 015 (North Star), or 019 (Martis Peak).	—	Area Plan development underway; Area Plan submitted to TRPA; scoping for EIR/EIS anticipated in June 2015.
Truckee Railyard Master Plan	Eastern end of historic downtown Truckee	Mixed commercial and residential development; includes Trout Creek District (6 acres of primarily mixed housing), Industrial Heritage District (8.5 acres of office, residential, and mixed use buildings), and Downtown Extension District (12 acres of commercial development).	—	Master Plan adopted in 2009; preliminary applications submitted October 2014; current application under review.
Pollard Station – A Senior Neighborhood	10335 Old Brockway Road, Truckee (West of Pine Cone Road terminus, at Hilltop)	Age-restricted senior neighborhood: lodge and condominiums (8-acres in the Hilltop Master Plan area).	86-unit senior lodge and 40 two-bedroom condominium units	Mitigated Negative Declaration comment period ended October 23, 2014; project approval pending.
Joerger Ranch Specific Plan	Intersection of SR 267, Brockway Road, and Soaring Way, Truckee	70-acre mixed use planned community including industrial, office space, public facility, transportation, and apartment uses.	318 dwelling units	Draft EIR available September 2013; Planning Commission recommended approval; EIR certification and approval by Town Council pending.

Table 4-2 Cumulative Projects List

Project Name	Location	Description	Residential Units and/or Non-Residential Area	Project Status
Canyon Springs Subdivision	West of Martis Peak Road and south of Glenshire Drive, Truckee	Clustered residential development that includes single family and affordable housing/multifamily units, and open space. Access is proposed off of Martis Peak Road with a gated emergency access off of Edinburgh Drive.	177 single-family lots and 8 affordable housing lots, 204 total units; 171 acres of open space	Recirculated Draft EIR comment period ended November 20, 2014; EIR certification and project approval pending.
Martis Camp	1200 Lodgetrail Drive, Truckee, CA	A private golf and ski club community of upscale second homes.	663 lots (between 2.5 and 0.5 acres) on over 2,000 acres	Opened in 2006; partially built-out.
Martis Valley Trail	Town of Truckee to Brockway Summit	The project is a paved, multi-use recreational trail extending from the southern limits of the Town of Truckee at the Nevada/Placer County line eastward to the ridgeline defining the Lake Tahoe Basin. A 5.4-mile section will run along SR 267 between Truckee and Northstar.	—	CEQA environmental review completed in 2012; project approved; multi-year construction began with the initial phase in fall 2014.
Middle Martis Creek Wetlands Restoration Project	11.3-acre site on the north side of SR 267 in Martis Valley	The project includes the restoration of historic wetlands on the north side of SR 267. The restoration proposal involves diverting peak flows at an existing culvert to resolve existing flooding, erosion, and headcutting problems along the creek. The proposal is expected to enhance up to 60 acres of wetlands in the area.	—	Application complete. CEQA Initial Study checklist preparation underway.
Northstar Mountain Master Plan	5001 Northstar Drive, Truckee	Mountain Master Plan for the existing ski resort area. Various additions and changes to ski lifts, snowmaking, trails, bridges, access, ropes course, bike trails, and campsites.	—	Final EIR released June 9, 2014; document certification/project approval pending outcome of the Northstar Basin Retrofit Project.
Northstar Forest Flyer	5001 Northstar Drive, Truckee	Construction and operation of an all-weather toboggan-style downhill coaster at Northstar.	—	MND released April 24, 2013; project on hold pending outcome of the Northstar Basin Retrofit Project.
Northstar Highlands Phase II	Northstar Drive, Truckee	Modifications to the original subdivision approval, reducing the development area and number of housing units (from 576 units to 446 units).	446 units, including townhomes, single family lots, condominiums, and 4,000 square feet of commercial space	Modifications approved in July 2013; construction on the first three phases underway. Project has until 2020 to complete construction.
Northstar at Tahoe Ski Trail Widening	Northstar Ski Resort	The project includes widening existing ski trails and associated snowmaking hydrant relocation.	—	Environmental review complete; grading permit pending.
Truckee River Corridor Access Plan	Truckee River Watershed, Placer and Nevada counties	Continuous and coordinated system of preserved lands and habitat, with a connecting corridor of walking, in-line skating, equestrian, bicycle trails, and angling and boating access from Lake Tahoe to the Martis Valley.	—	Environmental document to be prepared.

Table 4-2 Cumulative Projects List

Project Name	Location	Description	Residential Units and/or Non-Residential Area	Project Status
Caltrans Highway Improvement Projects	SR 267 between Placer County line and SR 28	Planned Improvements (those included in a long-term plan that can be funded) and Programmed Improvements (those included in a near-term programming document that identifies funding amounts by year) in the 2012 Transportation Corridor Concept Report for SR 267 include: widening to four lanes between the Placer County line and Northstar Drive, rehabilitating pavement and widening shoulders between Placer County line and Brockway Summit, plant establishment and protection from Northstar Drive to SR 28, and a Class II bicycle lane from Brockway Summit to SR 28.	—	Periodic construction between 2015 and 2025.
Village at Squaw Valley Specific Plan	Western end of Olympic Valley at base of Squaw Valley Ski Area	Establishes the guiding principles for comprehensive development of approximately 100 acres of the previously developed Squaw Valley Olympic Village.	Up to 1,493 bedrooms in 850 units, approximately 297,700 square feet of commercial, 90,000 square-foot Mountain Adventure Camp	Draft EIR released for public review May 2015.
Squaw Valley Ranch Estates	1525 Squaw Valley Road, Olympic Valley	The project includes a major subdivision to develop eight single-family residential lots with associated open space, access road and utilities on a 3.9-acre property.	8 residences	Mitigated Negative Declaration prepared; public comment period closed on January 2, 2015; Planning Commission hearing to consider project approval to be scheduled.
PlumpJack Squaw Valley Inn	1920 Squaw Valley Road, Olympic Valley	The project would replace the existing inn with a new hotel, residential buildings, underground parking, and an outdoor activity area on a 3.15-acre property.	60 hotel rooms and 24 residences to replace 61 existing hotel rooms	NOP released in June 2015.
Alpine Sierra Subdivision	Terminus of Alpine Meadows Road near Alpine Meadows Ski Resort	The project includes a 44-acre planned development to include single-family lots and commonly held parcels.	47 residences	Application complete; scoping period ended May 9, 2014; EIR preparation underway.
Homewood Mountain Resort Ski Area Master Plan	5145 Westlake Boulevard, Homewood	The project includes redevelopment of the ski area to include mixed-uses at the North Base area, residential uses at the South Base area, a lodge at the Mid-Mountain Base area, retail space, and other ski area improvements and accessory uses.	75 hotel rooms 35 hotel residences 138 condominiums 48 chalets 16 townhomes 13 apartments (workforce housing)	EIR/EIS certified and project approved in December 2011. Following legal challenge, a scaled down version of the original proposal was produced; phased project construction could begin in 2015 or 2016 and extend through 2022.
SR 89/Fanny Bridge Community Revitalization Project	SR 89 and SR 28 at the Truckee River Crossing, Tahoe City	Construction of a new bridge over the Truckee River, repair or replacement of Fanny Bridge, and various other improvements proposed to relieve traffic congestion during peak periods.	—	EIR/EIS/Environmental Assessment complete; environmental document certified and project approved by Tahoe Transportation District in April 2015 and by TRPA in May 2015.

Table 4-2 Cumulative Projects List

Project Name	Location	Description	Residential Units and/or Non-Residential Area	Project Status
Dollar Creek Shared-Use Trail	Between the existing trail at Dollar Hill and the Cedar Flats neighborhood on the North Shore	2.2 mile long shared-use trail.	—	Environmental review complete; project approved; construction expected to occur between 2015 and 2016.
Carnelian Fuels Reduction and Healthy Forest Restoration	National Forest System (NFS) lands on the North Shore, including areas adjacent to Cedar Flat, Carnelian Bay, Tahoe Vista, and Kings Beach	The project involves forest thinning using mechanical, hand, and prescribed burning treatments to reduce the risk of severe wildfire, improve forest health, and provide defensible space to neighboring communities. The project includes treatments on 3,297 acres of land.	—	Decision notice signed on August 20, 2012; implementation began in 2014 and will be completed within 7 to10 years, depending on funding and contractor availability.
Kings Beach Commercial Core Improvement Project	SR 28 commercial corridor, Kings Beach	Project involves reducing SR 28 in Kings Beach from a 4-lane highway to a 3-lane highway with a roundabout. Project is a SR 28 beautification project, and includes off-highway and water quality improvement components.	—	Environmental review complete; project approved. Phased project construction began in 2013, with ongoing construction activities during the appropriate season through at least 2016.
Rainbow Parking Lot	8334 Rainbow Avenue, Kings Beach	The project includes an 18-space public parking lot off of Rainbow Drive to support the Kings Beach Commercial Core Improvement project.	—	Mitigated Negative Declaration complete
West End Parking Lot	8200 to 8230 Rainbow Avenue, Kings Beach	The project would include construction of a 29-space public parking lot to support the Kings Beach Commercial Core Improvement Project.	—	Project application in review
Boulder Bay	Crystal Bay, Nevada	Redevelopment of Tahoe Biltmore on North Shore. Project includes a four-story, 275-room hotel with a 10,000 square-foot casino. Implementation of the project would reduce the total commercial floor area at the site from approximately 56,000 to 21,000 square feet.	—	Environmental review complete; project was approved on April 27, 2010. The applicant has secured financing, but the construction start date is unknown.
Incline Fuels Reduction and Healthy Forest Restoration	Most National Forest System (NFS) lands adjacent to Incline Village, Nevada	Mechanical, hand, and prescribed burning treatments. Tree thinning, biomass removal, prescribed burning, chipping, and mastication.	—	Decision notice signed on February 15, 2013. Implementation began in 2014 and is expected to be completed within 10 years, depending on funding and contractor availability.
Lake Tahoe Passenger Ferry Project	Cross-lake ferry service with a South Shore Ferry Terminal at Ski Run Marina in South Lake Tahoe and a North Shore Ferry Terminal at either the Tahoe City Marina or the Lighthouse Mall Pier.	Year-round waterborne transit between north and south shores of Lake Tahoe.	—	NOP/NOI released in November 2013; Draft EIS/EIR/EIS in preparation.

Source: Compiled by Ascent Environmental 2015

EX. K

NORTHSTAR HIGHLANDS

http://www.placer.ca.gov/upload/bos/cob/documents/sumarchv/2011Archive/110823A/bosd_110823_14e__p153_p156.pdf

August 23, 2011

The Northstar Highlands II project was approved to create 17 Large Lots on 64.7 acres. Within the 17 Large Lots, the approval included creation of 576 residential units (22 townhomes and 554 condominiums) and up to 200 commercial condominiums, including 4000 square feet of commercial floor space, and up to 32 employee housing units. This Northstar Highlands II, Phase 1 map (Home Run Townhomes) will create 16 "townhome" lots, one common area lot within Large Lot 10B, and a remainder.

(a total of 824 units)

Highlands III

https://www.placer.ca.gov/upload/bos/cob/documents/sumarchv/121211A/bosd12121117dp289p292.pdf

25 lots

From: Paul Thompson <PKThomps@placer.ca.gov>
To: Ellie <tahoellie@yahoo.com>
Sent: Wednesday, October 28, 2015 1:38 PM
Subject: FW: Northstar Highlands info

Hi Ellie – The original conditions of approval indicate 1,450 units.

Paul

From: Ellie [mailto:tahoellie@yahoo.com]
Sent: Sunday, October 25, 2015 2:25 PM
To: Paul Thompson
Subject: Northstar Highlands info

Hi Paul,

preserve@ntpac.com

From: Ellie <tahoellie@yahoo.com>
Sent: Thursday, June 2, 2016 9:19 AM
To: Ann Nichols
Subject: Fw: Northstar Highlands info

----- Forwarded Message -----
From: Paul Thompson <PKThomps@placer.ca.gov>
To: Ellie <tahoellie@yahoo.com>
Sent: Wednesday, October 28, 2015 1:38 PM
Subject: FW: Northstar Highlands info

Hi Ellie – The original conditions of approval indicate 1,450 units.

Paul

From: Ellie [mailto:tahoellie@yahoo.com]
Sent: Sunday, October 25, 2015 2:25 PM
To: Paul Thompson
Subject: Northstar Highlands info

Hi Paul,
Please let me know how many total units are approved for Northstar Highlands- all phases through 2020

Thank you, Ellie

PF13

Ann Nichols
North Tahoe Preservation Alliance
June 2, 2016

PF13-1 The comment provides background information on the North Tahoe Preservation Alliance and explains that it developed a website and circulated petitions. The comment states that the comments in this letter do not supersede previous comments submitted. Please see the Final EIR for responses to comments submitted on the Draft EIR. Responses to the comments in this letter are provided below, see responses to comments PF13-2 through PF 13-11.

PF13-2 The comment states that the EIR should be revised and recirculated and summarizes issues presented in the letter. Consistent with the discussion provided in Master Response 1 in the Final EIR, the responses to comments provide the following information:

- First, the responses address the environmental concerns raised by the comments, and describe how they are addressed in the Draft EIR;
- They provide corrections to the Draft EIR text, where such corrections are warranted, as reflected in Chapter 2 of this document;

- They expand on or provide minor clarifications to information already included in the Draft EIR in those instances where comments question this information;
- They result in refinements to mitigation measures that may more effectively reduce already identified significant environmental impacts of the project;
- They address recommendations for alternatives to the project, including whether these recommendations are already included in the alternatives evaluated in the Draft EIR;
- They address other information that has arisen since release of the Draft EIR, including modifications to the proposed project and the information in the Supreme Court rulings on CEQA issues that were published after the Draft EIR was released.

However, none of the conditions warranting recirculation of a Draft EIR, as specified in CEQA Guidelines Section 15088.5, has occurred. As demonstrated in the responses to comments and the addition of clarifying information, no new significant impacts would result; there is no increase in the severity of a significant impact identified in the Draft EIR, following mitigation; no feasible alternatives have been recommended that would avoid a significant impact that the applicant has declined to adopt; and as to adequacy, the County believes the Draft EIR is complete and fully compliant with CEQA.

PF13-3 The comment asserts that the Draft EIR did not adequately describe the local and regional context of the project because there was not a 3D terrain analysis of the site. Please refer to response to comment I031-22. As described on page 9-30 of the Draft EIR: "Three dimensional models of the topography were created based on engineering surveys of the development area, and 3D models of existing trees were created from aerial photo data".

As discussed in Master Response 4 in the Final EIR, the Draft EIR incorporated a systematic multi-step process to evaluate the visibility of the project site from surrounding areas within and outside of the Tahoe Basin. The methodology assessed the site's visibility through 1) a topographic modeling analysis, 2) site visits to viewpoints, and 3) the preparation of visual profiles. This effort identified a series of key observation points, or viewpoints that had the greatest potential to be adversely impacted by the project.

Visual simulations were prepared to assist the evaluation of visual impacts from each of these key observation points. The simulations were based on the project and project development boundaries as proposed in the current Specific Plan and conservatively represented the tree removal, building height, and light sources that could result from the project. Thus, the visual assessment methodology used for the Draft EIR is rigorous, state-of-the-art, and provided an appropriate basis for the visual assessment.

The comment also asserts that the project is not near existing development and raises concerns regarding infrastructure and disturbance related to the project. As addressed in response to comment I031-5 in the Final EIR, the project location and distances to other existing development are illustrated and described in Exhibits 3-1 through 3-1 and 3-12 through 3-14 of Chapter 3, "Project Description," in the Draft EIR. Distances to other development and infrastructure are accurately described in the Draft EIR. The EIR analyzes and discloses potential impacts in varying geographic contexts, as appropriate for each technical issue.

PF13-4 Please see response to comment PF14-7 regarding the viability of commercial development.

PF13-5 The comment suggests that the project is inconsistent with TRPA regional goals to limit VMT in the Tahoe Basin. In response to concerns related to Tahoe Basin impacts and the

origin/destination of vehicle trips, see Master Response 6 regarding VMT as well the discussion under the heading "TRPA Thresholds" in Master Response 2 of the Final EIR.

PF13-6 The comment states that the Draft EIR fails to adequately analyze and mitigate the project's impact on biological resources. The comment is similar to and repeats a portion of comment I031-18 on the Draft EIR. Please see response to comment I031-18, I031-13, and I031-20, and Master Response 3, in the Final EIR. These responses apply to comment PF13-6.

PF13-7 The comment states that the EIR fails to adequately analyze or mitigate visual impacts, including cumulative effects. This is incorrect. As required by CEQA, the Draft EIR analyzes scenic effects of the project, and the project contribution to cumulative changes in views and visual quality in Impacts 9-6 through 9-9. The impacts identify cumulative projects in the same viewsheds as the proposed MVWPSP and describe how those projects would alter views. The EIR then discusses how the MVWPSP would contribute to the alteration of views in the cumulative context. This analytical narrative provides adequate evaluation of the project contribution to cumulative effects. Photosimulations are used in the analysis to illustrate visual changes from existing conditions.

The text quoted from the Draft EIR stating that "No structures would be visible from Lake Tahoe…" is taken from page 9-37 of the Draft EIR and specifically addresses the photosimulations that were prepared from 300 feet and ¼ quarter mile off shore of Carnelian Bay. As discussed in response to comment I018-52 in the Final EIR, the MVWPSP site is visible from the Tahoe Basin, but only at long distances.

The drone photography (which was provided by the commenter, and was not prepared by the County, applicant, or their consultants) is an interesting exercise and helps demonstrate the difference between having a straight sightline to an object and being able to visually discern it. There is a straight sightline from the highest point of the MVWPSP site to points on the far end of the lake providing a view of the far end of the lake from this highest point. The lake is 22 miles long by 12 miles across. Since the drone photo shows the far end of the lake, it could be deduced that this is the distance from which one would have a direct sightline to the highest point of the MVWPSP site. Unlike the lake, project structures would be earth-tone colors, constructed of non-reflective material, and shielded by existing trees. It is reasonable to assume that the portion of the structures to which one might have a direct sightline several miles away would not be discernable through a screen of trees.

PF13-8 The comment states that the EIR fails to conduct an adequate impact analysis associated with the risk of wildfire and references attachments to the letter (Appendices I and H).

The following text summarizes the comments provided in Appendix I and provides responses to those comments. Appendix H is a list of attachments, and therefore no response is necessary.

1. Holistic nature of this process:

Regarding a summary of the results of the EIR analysis, Chapter 2, Executive Summary, of the Draft EIR provides a summary of the proposed project, the alternatives, the impacts and areas of known controversy and issues to be resolved. Table 2-1 of the Draft EIR summarizes all of the environmental impacts and mitigation measures, including cumulative impacts, identified in the Draft EIR. Revisions to the Executive Summary are provided in Chapter 2 of the Final EIR.

The comment suggests that assessing the project separately from Brockway Campground is not logical. The Brockway Campground is a separate, proposed project and for which environmental review has not yet commenced. As shown in Table 4-2 of the Draft EIR, the

Brockway Campground was included in the analysis of cumulative impacts, including the analyses of traffic and wildfire-related impacts. For a detailed discussion of Brockway Campground and cumulative impacts, please see Master Response 2 in the Final EIR.

The comment suggests that the comment letters submitted by state-level fire safety agencies, while well-intentioned, lack the specific content of the Northstar Fire Department and Northstar Fire Protection District. This observation is noted. The Northstar Community Services District/Northstar Fire Department (NCSD/NFD) would provide fire protection services to the MVWPSP, and as discussed in Impact 18-4 of the Draft EIR, the MVWPSP must comply with all ordinances, including those requiring fuel management. The MVWPSP Emergency Preparedness and Evacuation Plan (EPEP) provides additional details about the defensible space and fuel maintenance measures that would be undertaken, and includes NCSD Ordinances 26-09 (Fuel Maintenance and Defensible Space) and 28-13 (Fire Code) as well as the CAL FIRE General Guidelines for Creating Defensible Space.

2. Quality of report and data sources available for review.

The comment criticizes the quality of the Final EIR, citing a typographical error, the commenter's confusion about the role of Citygate Associates, and similarity to another environmental document. As indicated in the responses provided below, the comments to not provide evidence that the analysis provided in the Draft and Final EIR is inadequate.

The comment states that Citygate is a consultant to the County. This is incorrect. Rather, as stated on page 1 of its report, Citygate Associates was commissioned by the Northstar Community Services District, which includes the Northstar Fire District.

The comment describes issues with regard to the timing of preparation of the Emergency Preparedness and Evacuation Plan, a memo by LSC (April 2016), and the Final EIR, the conclusions of each, and difficulty obtaining a copy of the LSC memo, but it is not clear to what the comment is suggesting or how it relates to conclusions about emergency evacuation. The Draft EIR includes a qualitative analysis of effects of the MVWPSP on emergency evacuation, and concludes that the MVWPSP would have a less-than-significant impact on emergency response and evacuation plans (Impact 18-3). In response to comments on the Draft EIR, LSC prepared an analysis of the amount of time that would be required to evacuate MVWPSP residents and guests to the Tahoe-Truckee Airport, where they could safely stay until directed to the appropriate location. That analysis did confirm the conclusions of the Draft EIR. The analysis of evacuation time was conducted for both existing and cumulative conditions. Regarding Brockway Campground, see Master Response 2 of the Final EIR.

The comment suggests that 1.5 hours is a long time in the face of a serious wind driven fire event, and suggests that multiple scenarios should have been evaluated. The LSC memo analyzes the amount of time needed to evacuate the MVWPSP site on a peak summer day, when traffic levels on SR 267 would be high, and includes both existing and future conditions based on the traffic analysis in the Draft EIR. The analysis focuses on the amount of time it would take for residents and guests to travel to the airport. The comment suggests that the analysis should assess the rate at which fires would advance, considering such variables as wind speeds, direction, humidity and fuel moisture content considerations, topography, time of day, and fuel loadings (including brush). Because of the number of variables involved in the behavior of any given fire event, the number of scenarios that could be defined would be so numerous that selection of any one or several would be speculative and not necessarily representative. The more tangible metric, and a reasonable indication of the effect of the project on emergency evacuation, is the time required for evacuation of the project itself, and the effect of the project on overall evacuation times, as described in the EIR.

The comment suggests that Synchro 8 is not well-suited to evacuation modeling and that Vissim probably would be the proper modeling tool. As stated above, the LSC analysis focused on the amount of time needed to evacuate the MVWPSP under peak summer conditions. Vissim is appropriate for modeling complex traffic movements where they are affected by substantial pedestrian movements (such as closely spaced urban streets). However, at the key locations along the evacuation route analyzed between the project site and the airport area, pedestrian volumes are minimal, so this is not an issue. There is no reason to expect that VISSIM simulation would result in any substantial difference in the time required to evacuate the MVWPSP.

Regarding the contribution of traffic on SR 267 from other communities, the analysis is based on a peak summer day under both existing and cumulative conditions. Therefore, traffic from other projects is included in the baseline. The analysis is conservative, because it assumes 100% occupancy, which would occur seldom, if at all. Note that in an evacuation, traffic from these other areas has access to routes other than SR 267. For example, Northstar has an emergency access route through Martis Camp, so evacuees from Northstar would not necessarily use SR 267.

The comment also identifies two specific situations that might happen—a family van towing a boat trailer that tips over and blocks the evacuation route, and someone at the end of a queue responding to embers and smoke drifting across the road. These are speculative situations, one of a myriad that cannot meaningfully be incorporated into the quantitative analysis of time needed to evacuate the MVWPSP site.

3. Access Issues

Regarding congestion on SR 267 and the evaluation of evacuation times, please see responses to comments raised in Item #2, above.

Regarding the cost of improvements to SR 267, the State of California has identified $25 million toward improvements on SR 267 (to Brockway Summit), and the County has collected approximately $19.4 million, so nearly $45 million has been collected.[1] The MVWPSP would contribute additional funds toward these improvements through payment of County traffic fees. Because the timing of improvements is not known, the Draft EIR concludes that impacts on SR 267 would be significant and unavoidable (that is, mitigation could reduce the impacts, but there is uncertainty about when or if the improvements would be constructed). Nonetheless, given that the improvements are shown on both State and County programming lists and that the County is collecting fees toward the improvements, it is reasonable to assume that the improvements will occur at some time in the future, pending environmental review and approval.

Regarding the Fibreboard Freeway as a second emergency access route, see Master Response 2 in the Final EIR.

Regarding a provision of shelter in place, as a last resort, the EPEP requires that an HOA amenity be designed and constructed to serve as a shelter-in-place location, and that it be open to the public, not just owners, as an area of refuge (EPEP, page 4-8).

Regarding fuels management and defensible space, please see above, and Section 4.4 and Appendix A of the EPEP. For responses to the NCSD/NFD comment letter on the Draft EIR, please see Responses to Comment Letter LA2 in the Final EIR. That comment letter does not refer to "community wild fire protection planning (CWPP), so it is not clear what the triggers

[1] Rich Moorehead, Engineering Manager, Placer County Public Works and Facilities, Engineering Division, July 7, 2016, statement to Placer County Planning Commission (page 14 of transcript).

and timing of activities related to a CWPP would be, and the BEAR comment does not provide any specific information that would allow further response.

Regarding fees for trail maintenance and recreation activities, the comment does not indicate how these are tied to fire safety. The suggestion that the CC&Rs include support for and certification under the National Fire Protection Association's "Firewise" program is noted. The Firewise Communities USA/Recognition Program provides recognition for communities that obtain a wildlife risk assessment from the state forestry agency or fire department, form a board or committee and create an action plan based on the assessment, conduct a Firewise Day event, invest a minimum of $2 per capita in local Firewise actions per year and submit an application to the state Firewise liaison.[2] The activities that would be associated with the Firewise recognition would be similar to those activities already under the purview of the NCSD/NFD (such as providing evaluations of fire risk and recommending fire prevention measures[3]) and/or required by the fuel maintenance and defensible space ordinances and/or EPEP (e.g., use of Firewise construction materials, thinned vegetation[4]). Because mitigation measures identified in the Draft EIR and existing ordinances and regulations would reduce impacts related to fire safety to a less-than-significant level, additional measures such as obtaining Firewise recognition would not be required. However, the MVWPSP Homeowners Association could elect to pursue such recognition.

5. ISO (Insurance Services Office) Property Insurance Issues at Martis Valley West.

The comment states that all MVWPSP parcels will be more than 5 miles from the nearest fire station, and would therefore automatically be rated "9" under ISO rules. This is incorrect. The entire MVWPSP is within 5 miles of a fire station and several large portions of the plan area are within 5 miles of two stations (see Figure 5-6 of the MVWPSP). Therefore, the contention that the ISO rating for project development would automatically be "9" is inaccurate.

The comment also states that it will be difficult for MVWPSP homes to obtain insurance regardless of defensible space, building fire hardening and/or the availability of water and refers to applications in the Lake Tahoe area that have not been able to renew insurance. The comment does not indicate why policies are not being renewed, so it is not clear that the MVWPSP homeowners would be similarly affected.

PF13-9 The comment asserts that the Draft EIR's analysis of alternatives is inadequate. See Master Response 10 regarding the alternatives analysis, which explains that the Draft EIR "permits a reasoned choice" by evaluating a range of alternatives that includes alternatives that range from no development to maximum development allowed under the Martis Valley Community Plan; alternatives to reduce impacts on key resources; alternatives that reduce all impacts, and alternative land use types and alternative locations. Regarding concern that the EIR did not consider a higher density clustered development alternative, please see Alternative 4 in the Draft EIR, which evaluated a reduced footprint hotel alternative on the West Parcel. Alternative 4 reduces the area zoned for development and has a higher density of units in a hotel. The EIR is adequate and meets CEQA requirements for development and evaluation of alternatives.

PF13-10 The comment states that the Draft EIR does not adequately evaluate cumulative impacts and claims that the EIR deferred cumulative analysis. The EIR did not defer cumulative analyses. The comment selectively quotes Cumulative Impact 5-6, which addresses the cumulative

[2] National Fire Prevention Association, *A User Reference Guide to the Firewise Communities/USA Recognition Program*, page 4.
[3] National Fire Prevention Association, *A User Reference Guide to the Firewise Communities/USA Recognition Program*, page 12.
[4] National Fire Prevention Association, *A User Reference Guide to the Firewise Communities/USA Recognition Program*, page 13.

alteration of present or planned land uses and cumulative conflict with relevant plans, policies, designations, or zoning. The full discussion of this cumulative impact, on page 5-29 of the Draft EIR, thoroughly describes the project contribution to the cumulative condition and determines based on the full discussion that there would be no cumulative impact related to land use conflicts.

The comment also provides a list of edits to the related cumulative projects in Table 4-2 of the Draft EIR. The approach to the cumulative impact analysis is described in Section 4.2 of the Draft EIR, explaining that probable future projects considered in the cumulative analysis are in the project vicinity and have the possibility of interacting with the MVWPSP to generate a cumulative impact (Table 4-2). The list of projects is based on the best available information from the applicable agencies at the time of preparation of the Draft EIR in 2015. All the project-specific details of each project in Table 4-2 are not listed; rather summaries of each project are provided to aid in understanding of the type/intent of the cumulative projects. The assumptions related to the cumulative projects used in the EIR analysis are accurate. The projects listed in Table 4-2 were considered in the development and analysis of the cumulative settings and impacts for most resource topics within the geographic scope of each resource topic (as listed in Table 4-1 of the Draft EIR). In addition, certain resources use a “plan” approach (air quality, greenhouse gas emissions, and transportation) rather than a “list” approach to identify the cumulative setting. Past and present projects in the vicinity were also considered as part of the cumulative setting, as they contribute to the existing conditions upon which the MVWPSP and probable future projects’ environmental effects are compared. The cumulative impact analyses in each resource chapter of the EIR fully evaluate cumulative conditions and the project’s contributions to the cumulative impacts.

PF13-11 The comment requests recirculation of the EIR. See response to comment PF13-2, above, and Master Response 1 of the Final EIR.

PF14

CCEC
California Clean Energy Committee
California Clean Energy Committee | 3502 Tanager Avenue, Davis, CA 95616-7531
Voice: 530-756-6141 | Facsimile: 530-756-5930
http://www.californiacleanenergy.org/

NTPA NORTH TAHOE PRESERVATION ALLIANCE
North Tahoe Preservation Alliance
P.O. Box 4
Crystal Bay, Nv. 89402
775-831-0625
www.ntpac.com
"Helping preserve the natural beauty and rural character of North Lake Tahoe"

June 3, 2016

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, California 95603

Re: Comments on Final Environmental Impact Report
Martis Valley West Parcel Specific Plan Project
State Clearinghouse No. 2014032087

Placer County Community Development Resource Agency:

This letter will constitute comments by the California Clean Energy Committee and the North Tahoe Preservation Alliance on the Martis Valley West Parcel Specific Plan Final Environmental Impact Report (EIR). The Clean Energy Committee previously submitted comments on the draft EIR as part of the North Tahoe Preservation Alliance (NTPA) letter of December 21, 2015. The defects in the EIR have not been corrected. PF14-1

The Martis Valley West Parcel Specific Plan (MVWPSP or project) would specify new land use controls for 7,428 acres of coniferous forest land located north of Lake Tahoe on both sides of SR 267. The proposed specific plan would convert 662 of forest land on the southwest side of SR 267 adjacent to the Northstar Resort to sprawl residential development by rezoning the land from Timberland Production Zone (TPZ) to Residential.

The California Clean Energy Committee is a California non-profit corporation located in Davis, California, which advocates on behalf of the general public in California for energy conservation, greenhouse gas reduction, sustainable transportation, the development of clean-energy resources, and related environmental issues. The Clean Energy Committee actively supports the application of the California Environmental Quality Act (CEQA) to energy conservation and related environmental impacts. Since 2008 the Committee has supported communities across California protecting and conserving valuable environmental resources.

Over thirty (30) individuals in the North Shore area have joined the Committee's request that Placer County require robust energy conservation, forest resource protection, and

environmental stewardship in the Martis Valley West Parcel Specific Plan. The Committee does not support the project because it consists of sprawl development. Copies of the petitions are enclosed.

The North Tahoe Preservation Alliance (NTPA) is Nevada non-profit corporation formed in 2008 to ensure that North Lake Tahoe retains its natural beauty and easy-going, lifestyle. Its Board of Directors is comprised of long-time Tahoe residents and property owners. NTPA was originally formed to analyze a new 850,000 square foot development on North Stateline named Boulder Bay. When the Martis Valley West Project came up in 2013, NTPA developed the web-site: www.savetahoeforests.com and later began two petitions: (1) "Tahoe Regional Planning Agency: Establish Enforceable Ridgeline protections in Tahoe Area," which garnered 1559 support and (2) "Placer County Board of Supervisors: Remove Tahoe Basin Portion of Martis Valley West Project," which received 3327 supporters. PF14-1 cont.

All notices regarding this project should be sent to 3502 Tanager Avenue, Davis, California 95616-7531 and to North Tahoe Preservation Alliance, P.O. Box 4, Crystal Bay, NV 89402. Please feel free to contact the undersigned for additional information.

Accompanying this letter there is a USB drive containing electronic copies of the documents listed in the appendix to this letter in pdf format. Please contact us if you have any difficulty displaying the documents.

As has been pointed out in multiple comments on the draft EIR, there are a number of areas where the environmental impacts should be more carefully evaluated and where feasible mitigation measures should be adopted. The EIR should be revised and recirculated.

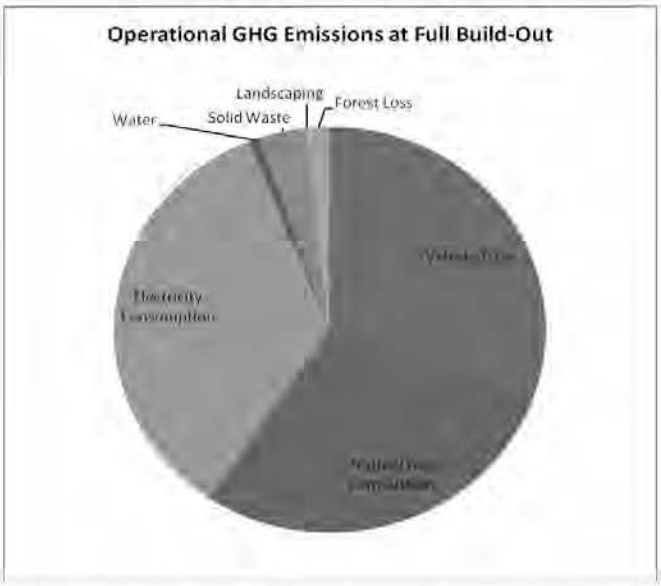
1. GHG Mitigation

Recently, scientists have concluded that sea levels could rise nearly twice as much as previously predicted by the end of this century if carbon dioxide emissions continue unabated. Such an outcome would devastate coastal communities in California and around the globe. Recent reports show that coral reefs, which are crucial incubators for the ocean's ecosystem, have been subjected to severe bleaching compounded by climate change. This year the U.S. EPA has released reports documenting the compelling public health case for action to limit climate change. In March, the Interior Department concluded in a public report that climate change will hasten existing water supply concerns in the Western United States. Atmospheric temperatures continue to increase unabated. PF14-2

With respect to the MVWPSP, the County has concluded that the project would have a significant and unavoidable impact on climate change. Table 12-2 of the final EIR estimated that at full build out annual GHG emissions resulting from project operation

would be 35,865 metric tons (MT). Those emissions can be graphically illustrated as follows--

PF14-2 cont.



The county reached the erroneous conclusion that achievement of future GHG efficiency standards is largely dependent on regulatory controls applied to all sectors of the California economy and that it would not be possible to mitigate the GHG impacts of the project. However, local governments are ideally positioned for fighting global climate change. Major sources of GHG emissions such as transportation and building emissions are significantly influenced by local government decisions. The county must identify feasible mitigation for the GHG impacts of the project.

The final EIR sets forth Mitigation Measure 12-2 which would apply only if a new GHG target or program is adopted by legislative or administrative action. If such a target or plan were established, applicants for subdivisions within the project area would be required to demonstrate that the proposed subdivision is consistent with the adopted target or plan. If the subdivision did not meet the target, then mitigation measures are to be incorporated into the project to reduce GHG emissions.

MM 12-2 does not constitute sufficient mitigation for GHG impacts. The formulation of mitigation measures should not be deferred to a later date. The County must adopt specific and enforceable GHG mitigation. If the design of a specific measure is to be de-

ferred, the County must identify a performance standard. MM-12 is speculative and unsupported.

CCEC recommends that the GHG impacts be mitigated by requiring solar water heating on homes built as part of Martis Valley West. Solar water heating systems save consumers money and can offset up to 80% of the energy used to heat water for single-family and multifamily homes. Solar water heating represents a significant untapped potential for natural gas savings in California. Installing solar water heaters on the 760 dwelling units planned for Martis Valley West would save approximately 577.6 metric tons of CO2e annually. PF14-2 cont.

Project Annual GHG Savings from Solar Hot Water	
GHG Savings per Dwelling	0.76
Proposed Dwellings	760
Annual GHG Savings (MT CO2e)	**577.6**

CCEC recommends installing ground source heat pumps (GSHP) to mitigate climate impacts. GSHPs reduce the need for natural gas for space heating in the winter and reduce the amount of electricity required for air conditioning in the summer. GSHPs can be equipped with a "desuperheater" for heating domestic hot water to further reduce fossil fuel use. GSHPs can reduce energy consumption--and corresponding emissions--up to 44% compared with air-source heat pumps and up to 72% compared with electric resistance heating with standard air-conditioning equipment.

CCEC recommends that GHG emissions resulting from solid waste disposal be mitigated by implementing a "green bag" or similar program for the project in conjunction with the popular green bag program operated by Tahoe Truckee Sierra Disposal (TTSD). TTSD is the waste hauler for the Town of Truckee and for the project site. According to the Town of Truckee, residents purchase special green bags for yard trimmings. Four green bags will be picked up for free with regular residential refuse and recycling service. Yard waste collected through the green bag program is sent to a biomass center to generate electricity or is chipped and resold as ground cover. This process reduces the amount of green waste that enters the landfill, reduces the amount of organic material decomposing anaerobically in the landfill, and reduces landfill gas emissions. Landfill gas contains high levels of methane which is a potent greenhouse gas. The

County should analyze and adopt mitigation to fund TTSD to extend the green bag service from Truckee to include the project site. Project residents could be charged for any additional cost as part of their regular refuse service.

CCEC recommends that the County evaluate and adopt narrow streets and reduced parking for the project to mitigate GHG emissions from both construction and operation of the project. Energy-efficient street design reduces the amount of heat absorbed by streets which translates into cooler neighborhoods and less air conditioning use. Energy efficient streets are narrower and better shaded. Narrowing road widths reduces the energy required for building air conditioning and reduces the need to demolish sequestered carbon. Narrower streets also calm traffic, reduce development costs, and maintain a human scale that encourages cycling and walking which further mitigates GHG emissions. PF14-2 cont.

CCEC recommends upgrading building energy designs beyond Title 24, Part 6, requirements to mitigate GHG impacts. All buildings in the project should be designed to Energy Star standards or better to mitigate GHG emissions. Upgrading building insulation throughout the building envelope reduces the amount of energy required for building heating and cooling and thereby mitigates GHG emissions and saves money. Homes should be oriented to the path of the Sun to reduce the energy required for heating and cooling, resulting in lower energy bills and increased indoor comfort. Energy efficiency can be increased by requiring the use of energy-efficient LED lighting and day-lighting to bring sunlight into the building. A commissioning agency should be used to ensure that the buildings achieve energy conservation requirements.

GHG emissions should be mitigated by requiring the installation of solar PV on all buildings as the project is built. Making buildings solar ready does not mitigate GHG emissions. The additional cost of moving from solar ready to installing solar during the course of construction is not large and is cost effective. Buildings should be designed to optimize rooftop orientation and rooftop space available for solar PV consistent with anticipated building electric load and cost-effective design. The county should evaluate and adopt renewable energy for the project as mitigation for the greenhouse gas impacts.

CCEC recommends reducing GHG emissions further by building the project in a more compact form so that fewer trees need to be removed thereby reducing the amount of sequestered carbon that must be destroyed to develop the project and making the project more walkable to reduce reliance on automobiles.

GHG emissions from the project should further be reduced by purchasing forestry offsets or other types of carbon offsets. With respect to forests, the California Air Resources Board has adopted a Forest Protocol that provides requirements and methods for quantifying the net climate benefits of activities that sequester carbon on forestland. PF14-2 cont.

CCEC has also recommend to the County a number of measures to reduce the vehicle trips generated by the project and the vehicle miles travelled (VMT) in the Lake Tahoe Basin and beyond which should also be adopted to mitigate the GHG impacts of the project.

2. Transportation

The transportation analysis assumes that 6.6 acres of the overall site will be devoted to building 34,500 square feet of commercial uses. Based on that commercial development, the county concludes that the trips generated from residential dwellings that access roadways external to the project site will be reduced by 10 percent. The assumption is inaccurate. The project is largely second home residences that will often be vacant, and it is not of sufficient size or at a suitable location to support the level of commercial development projected. The development of commercial is unlikely to occur and would therefore not serve to reduce transportation impacts. PF14-3

Further, if some commercial were built, nothing ensures that the type of commercial built would attract a significant number of trips or that it would have any impact on resident travel to Reno, Truckee, Kings Beach, or Tahoe City for ordinary errands. The traffic impact analysis should be revised accordingly.

The EIR should evaluate the additional vehicle miles travelled (VMT) that will result from the project being preponderantly second homes. As has already been pointed out, second homes on the project site will entail considerable travel from distant locations including trips from the Bay Area, from Southern California, and form other states and countries by individuals who own second homes at Lake Tahoe. Owners of second homes at Lake Tahoe will be required to travel considerable distances to visit their home at Lake Tahoe. The additional long-distance travel is a potentially significant impact that must be evaluated.

CCEC recommends that that the County mitigate transportation and GHG impacts by providing signage on SR 267 and by funding marketing efforts to inform travelers that SR 267 connects the area with Amtrak at the Truckee Depot and encouraging travelers to use Amtrak to avoid taking their cars on vacation. Coupons or other discounts should be provided to travelers who use Amtrak to reduce travel by car.

CCEC recommends that the County mitigate transportation impacts by requiring that the project prepare and the county approve a transportation demand management (TDM) program that would reduce the expected peak period motor vehicle trips by a relatively aggressive target number. PF14-3

The TDM program should be designed in coordination with Tahoe Area Regional Transit, the Truckee North Tahoe Transportation Management Association (TNT/TMA), and other appropriate agencies. It should use zone of benefit funding, developer fees and other appropriate mechanisms to fund the TDM programs. It should provide for annual monitoring and contain enforcement mechanisms or penalties that accrue if targets are not met.

The TDM plan should include a package of mitigation measures funded by the project that reduce transportation and GHG impacts by increasing transit usage on SR 267 and on other roads served by TART. It should include increasing service frequency, reducing travel time, improving reliability, and modifying schedules to match service with demand.

The TDM plan should be coordinated with Amtrak schedules and connecting transit routes as appropriate. The TDM plan should include discounted or free transit passes for West Martis residents, employees of businesses along SR 267, guests, and others using SR 267 such as Northstar patrons. The program should also include a "clean air cash" component where those choosing to commute via TART would receive a cash payment as

appropriate. The plan should include programs for promoting sustainable transportation choices and reducing use of automobiles among people vacationing or recreating in the North Lake Tahoe/Truckee area including on-going marketing programs and signage as appropriate. The TDM plan should include funding for transit stop upgrades to encourage travelers to use transit reducing traffic, transportation infrastructure development costs, road maintenance costs, and GHG impacts as appropriate.

PF14-3 cont.

The specific plan provides that there will be a bus shelter located near the entrance to the project that will accommodate regional transit vehicles without extensive off-route travel. As designed the entrance area of the project where the transit stop would be located is separated from most of the project. The specific plan should encourage transit use and mitigate transportation impacts by arrangements with the TNT/TMA to fund a transit stop located in the project where it would be most convenient for residents, guests, and employees and would maximize ridership. The possibility of a shuttle being implemented after 340 homes have been built as discussed in the specific plan would not provide service beyond the project area and would not be enforceable as there are no provisions assigning responsibility for implementation, funding or management of the shuttle.

CCEC recommends mitigating transportation and GHG impacts by contributing funding to some of the numerous bike facility projects in North Lake Tahoe that could be funded by the project in order to increase bicycle usage in the North Tahoe area and to offset the project's contribution to vehicle miles travelled and GHG emissions. Among other items, the Tahoe Regional Planning Agency (TRPA) and the Placer County Regional Bikeway Plan recommend a Class II bike lane on SR 267 from Truckee to Kings Beach. We surveyed SR 267 and

paved shoulder already exist beyond the traffic lane along most of the route that would facilitate cost-effective implementation of a Class II bike lane. Alternatively another improvement area could be selected.

PF14-3 cont.

Further, the emergency vehicle access route for Martis Valley West should be designed and signed to provide routing for road bikes traveling from the project to North Lake Tahoe via SR 267. The existing project design leaves cyclists headed for Lake Tahoe going down a steep incline to SR 267 and then climbing back up to Brockway Summit making the trip considerably longer and steeper. Appropriate signage inside the project should be implemented in coordination with other improvements to encourage the use of bikes to ride to Kings Beach and to Truckee from the project.

3. Energy Analysis

There is no support for the conclusion that the project will reduce per capita energy consumption. Since 80 percent of the homes in the project are expected to be second homes, the EIR is effectively saying that owning and commuting to a second home in Lake Tahoe will reduce a person's annual energy consumption. Clearly, a person using two homes would have many energy uses continuing in both their first home and their second home at the same time. Furthermore, additional energy would be consumed traveling between the two homes. Having two homes is an inefficient energy practice and it should be identified an analyzed as such. PF14-4

The design of the project, which would place a relatively small number of homes over a large land area, is energy inefficient and should be analyzed and reported to the public as a significant adverse impact to energy. The project's sprawling layout encourages people to use cars to get around within the project, rather than using efficient modes such as biking or walking.

The energy analysis provides the gross energy usage for the project but it contains no meaningful breakdown of the energy information by dwelling or by usage. The gross energy usage without a threshold or comparative information provides the public and decisionmakers no useful analysis or information on the energy efficiency of the project. Energy consumption cannot be understood in a meaningful way without a breakdown by category of use based on what would be typical of homes or commercial properties in the region and without a standard or measure to determine energy efficiency. Stating that "operation of the proposed project would be typical of residential and commercial uses requiring electricity and natural gas" is of no value to the public or decisionmakers. The analysis is well below the professional standards. The typical home is not energy efficient.

The project does nothing that would result in exceeding Title 24 standards. The project does nothing that would result in the buildings being oriented or designed to effectively

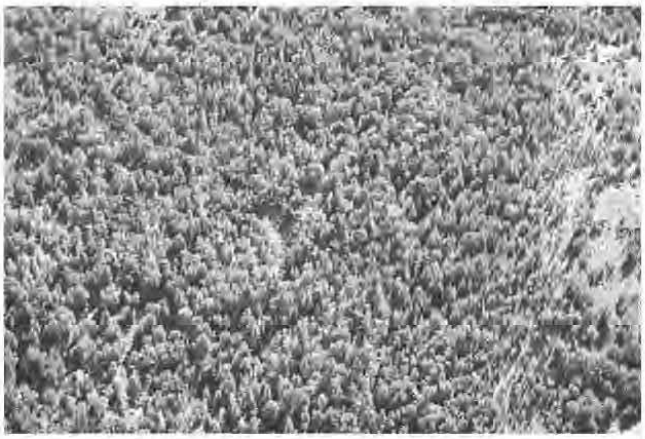
use day-lighting or building massing or fenestration to reduce lighting or space conditioning loads. Structures built to meet the minimums of Title 24 fail by a considerable margin to implement all cost-effective energy efficienct design opportunities. The EIR does not demonstrate that the project would be energy efficient.

The EIR reports that 20 percent of the energy supplied by Liberty Utility is derived from renewable resources. There is no support for this proposition and nothing is said about how or where the remainder of the energy supplied by Liberty is generated. The full nature of Liberty Utility supplied electric power should be disclosed, and if Liberty relies on fossil fired power, such as coal-fired power, that should be disclosed, analyzed and identified as a significant energy impact. PF14-4 cont

The EIR should analyze methods for reducing the fossil fuel consumption of the project such as solar energy. The EIR should analyze and determine that the failure to implement solar water heating and the failure to implement solar photovoltaic generation as a part of the project result in a significant impact to energy conservation. The statement that the project would encourage the use of renewable energy resources is unsupported.

4. Tree Mortality Impact

The EIR purports to provide a cumulative analysis of the impact to conversion of forestland to non-forest use. The analysis concludes that the 651.5 acres of forest that would be converted would be small and less than one percent relative to the 400,000 acres available in the area. This does not constitute an adequate analysis of cumulative impact. the county must determine whether the combined impact of the project and other conversions of forest land are significant. Further the analysis include the conversion of forest land resulting from climate related influences such as drought, wildfire, and bark beetle, and the analysis should not rely for its baseline on comparing the proposed project to the potential build-out of the East Parcel under the Martis Valley Community Plan. PF14-5



5. Alternatives

Alternative 1 assumes that no new development occurs on either the West Parcel or the East Parcel. Alternative 2 assumes development of the East Parcel in accordance with the existing Martis Valley Community Plan. (MVCP). Neither of these achieves the basic project objectives and neither constitutes part of a reasonable range of alternatives.

PF14-6

Alternative 3, which the EIR describes as a "reduced density alternative," would eliminate 342 residential units from the project thereby reducing the number of units by 45 percent. In all other respects the project would remain the same including the zoning of 662 acres of forest land to residential use. After analysis, the County concluded that Alternative 3 would meet the basic project objectives. Further the County concluded that Alternative 3 would result in fewer vehicle trips than the proposed MVWSP. The County should adopt Alternative 3 because it would meet the project's objectives and would substantially lessen the environmental impacts.

The EIR described Alternative 4 as the "reduced footprint, hotel alternative." Under Alternative 4 the number of residential units to be built would be reduced by 260 to a total of 500 units and a 100-unit resort hotel and a 150-space parking lot would be added to the project. According to the county, Alternative 4 was evaluated in the EIR due to its potential to "reduce impacts resulting from surface disturbance and consumption of forest land." However, the EIR concludes that after mitigation there would be no significant and unavoidable impact to "surface disturbance and consumption of forest land." The county's reason for evaluating this alternative was fundamentally flawed.

CCEC and NTPA have prepared two alternatives which meet the project objectives and substantially reduce impacts to transportation, GHG emissions, aesthetics and other natural resources. These alternatives are attached to this correspondence along with the supporting analysis. We urge the county to adopt one of these alternatives to reduce project impacts.

The County has not examined a reasonable range of alternatives. A smart growth alternative such as the ones submitted would reduce the significant and unmitigated impacts. PF14-6 cont.

Eugene S. Wilson
California Clean Energy Committee

Ann Nichols
North Tahoe Preservation Alliance

Enclosures

APPENDICES

Appendix 1	Amtrak Sustainability Report (2013).
Appendix 2	California Zephyr Schedule (2016).
Appendix 3	Placer County Transportation Planning Agency, Placer County Regional Transportation Plan 2010-2035.
Appendix 4	Shutterstock, Amtrak Station sign.
Appendix 5	New York State Small Business Development Center, What's Your Signage?
Appendix 6	Tahoe Regional Planning Agency, Lake Tahoe Region Bicycle and Pedestrian Plan (2014).
Appendix 7	Tahoe Regional Planning Agency, Lake Tahoe Region Bicycle and Pedestrian Plan, Appendix B, Maps and Project Lists (2014).
Appendix 8	City of Palo Alto, Bicycle + Pedestrian Transportation Plan (July, 2012).
Appendix 9	Brockway Campground assessor parcel map.
Appendix 10	County of Placer, Martis Valley Community Plan (2003)
Appendix 11	Brockway Campground website.
Appendix 12	City of Truckee, Truckee TransCAD Traffic Model Calibration Memorandum (2015).
Appendix 13	The Hill, Climate Change Expected to Raise Public Health Risk (Apr. 4, 2016).
Appendix 14	New York Times, Climate-Related Death of Coral Around World Alarms Scientists (Apr. 9, 2016).
Appendix 15	The Guardian, February Breaks Global Temperature Records by "Shocking" Amount (Apr. 26, 2016).
Appendix 16	The Hill, Feds" Climate Change to Impact Western Water Trends (Mar. 22, 2016).
Appendix 17	Washington Post, Scientists Nearly Double Sea Level Rise Projections for 2100, Because of Antartica (Mar. 30 2016).

Appendix 18	New York Times, Seas Are Rising at Fastest Rate in Last 28 Centuries (Feb. 22, 2016).
Appendix 19	Federal Register, Proposed Finding that Greenhouse Gas Emissions from Aircraft Cause or Contribute to Air Pollution (Jul. 1, 2015).
Appendix 20	Heede, R., Energy Consumption and Carbon Emissions from Second Homes in Aspen (Sept., 2007).
Appendix 21	Davis Energy Group, New Construction Analysis Modeling Results (Aug., 2015).
Appendix 22	U.S. Department of Energy, Energy Star Certified New Homes.
Appendix 23	U.S. DOE, A Homebuilder's Guide to Going Solar
Appendix 24	California Energy Commission, The California Energy Commission's New Solar Homes Partnership P:rogram Case Study (2015).
Appendix 25	California Energy Commission, Energy Aware Planning Guide (2011).
Appendix 26	Statewide Energy Efficiency Collaborative, City Planners' Energy Action Resource Guide (2011).
Appendix 27	Solar Today, Solar Carries a Swimming Pool Through the Winter (May, 2012).
Appendix 28	Solar Today, Solar Water Heating (April, 2016).
Appendix 29	Liberty Utilities, Net Metering Application Procedures for Liberty Utilities.
Appendix 30	U.S. DOE, California Energy Star Program Requirements: Which Version of the Program Requirements Should I Use?
Appendix 31	U.S. DOE, California Program Requirements Energy Star Certified Homes, Version 3.1 (Rev. 08).
Appendix 32	Kok, N. & Kahn, M., The Value of Green Labels in the California Housing Market (Jul., 2012).
Appendix 33	3Degrees, Carbon Offset Proposal.
Appendix 34	Wikipedia, Carbon Offset.
Appendix 35	CalEPA, Compliance Offset Protocol U.S. Forest Offset Projects (Nov., 2014).

Appendix 36	California Air Resources Board, Compliance Offset Protocol U.S. Forest Projects (Nov. 2014).
Appendix 37	NewForests, New Forests Registers Forest Carbon Offset Project at Hanes Ranch in Mendocino County, California.
Appendix 38	California Air Pollution Officers Control Association, Model Policies for Greenhouse Gases in General Plans (2009).
Appendix 39	California Attorney General's Office, Addressing Climate Change at the Project Level (2010).
Appendix 40	California Office of Planning and Research, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review (2008).
Appendix 41	Cool2012, Problem: Land-Filling Food and Paper is Heating the Planet.
Appendix 42	Truckee Sierra Disposal, Green Waste.
Appendix 43	GoSquaw.com, Is Truckee's Green Bag Program in Trouble?
Appendix 44	U.S. Composting Council, USCC Position Statement: Keeping Organics Out of Landfills.
Appendix 45	City of Palo Alto, Palo Alto Climate Protection Plan (2007).
Appendix 46	California Air Resources Board, Proposed Short-Lived Climate Pollutant Reduction Strategy (Apr., 2016).
Appendix 47	Town of Truckee, Green Bags for Yard Waste.
Appendix 48	U.S. DOE, Choosing and Installing Geothermal Heat Pumps.
Appendix 49	California Energy Commission, Geothermal or Ground Source Heat Pumps (2016).
Appendix 50	U.S. DOE Office of Geothermal Technologies, Environmental and Energy Benefits of Geothermal Heat Pumps.
Appendix 51	U.S. DOE, Geothermal Heat Pumps.
Appendix 52	International Ground Source Heat Pump Association, What Is Geothermal?
Appendix 53	International Ground Source Heat Pump Association, What Is Geothermal FAQs.

Appendix 54	International Ground Source Heat Pump Association, What is Geothermal? Residential.
Appendix 55	Placer County, Martis Valley Community Plan Update DEIR (May, 2002).
Appendix 56	National Center for Sustainable Transportation, Increasing Highway Capacity Unlikely to Relieve Traffic Congestion (Oct. 2015).
Appendix 57	Nichols, A., Statement of Ann Nichols.
Appendix 58	City of Palo Alto, Comprehensive Plan Update Draft EIR, Transportation and Traffic.
Appendix 59	City of Santa Clara, Draft Environmental Impact Report Great America Office Campus Expansion (Jun., 2013).
Appendix 60	Sierra Sun, Lake Tahoe-Truckee Transit Future Full of Hope; Big Money Needed (Nov., 2015).
Appendix 61	U.S. Dept. of Transportation, Mitigating Traffic Congestion: The Role of Demand-Side Strategies.
Appendix 62	Progressive Railroading, Rail News: Passenger Rail Metrolink Lowers Fares to Boost Ridership (May, 2016).
Appendix 63	Sierra Sun, California, Tahoe-Area Tree Deaths Climb to Record Levels Thanks to Bugs, Drought (Apr. 2016).
Appendix 64	The Current, Predicting Tree Mortality.
Appendix 65	Carnegie Science, Tens of Millions of Trees in Danger from California Drought.
Appendix 66	CalFire, Tree Mortality Viewer.
Appendix 67	Letter Ezra Beeman to Eugene Wilson re Rooftop PV
Appendix 68	Letter Kevan Shafizadeh to Eugene Wilson re Transportation
Appendix 69	CalRecycle, Climate Change and Solid Waste Management (Jun., 2016).

Petition for Resource and Energy Efficient Design

of Martis Valley West Draft EIR

Page 1 of _____

We, the undersigned, support the efforts of the California Clean Energy Committee that Placer County require robust energy conservation, reduced forest impacts, and environmental stewardship in the Martis Valley Specific Plan project:

Name	Address	Email
TOM SPECHT Date: 5-22-16	745 CROSBY CT INCLINE VILLAGE INCLINE CREST III NV OFF OF COLLEGE AVE	SLS2458@COMCAST.NET
Zach Schomp Date: 5-22-16	PO Box 278 Tahoe City, CA 96145	zachschomp@icloud.com
Manuela Franks Date: 5-22-16	PO BOX 278 Tahoe City, CA 96145	manuelaft@gmail.com
GARY RUDLAFF Date: 5-22-16	~~P.O. BOX~~ 6117 Rockypt North Star	garyrudlaff@msn.com
Ron Hewins 5-22-16 Date:	6067 Northwood Blvd	Nesalesref@aol.com
Alfred Weeks Date: 5/22/16	240 Tuspora Road Crystal Bay NV	
Dan Prime Date: 5/22/16	1110 Canterbury dr KB. CA 96143	–
NATHAN PRYST Date: 5/22/16	4058 Nevada ST Carnelian Bay, CA	–

California Clean Energy Committee

Petition for Resource and Energy Efficient Design

of Martis Valley West Draft EIR

Page 2 of ____

We, the undersigned, support the efforts of the California Clean Energy Committee that Placer County require robust energy conservation, reduced forest impacts, and environmental stewardship in the Martis Valley Specific Plan project:

Name	Address	Email
REX RYAN Date: 5/22/16	246 cutthroat ave KingsBeach	RexR@yahoo.com
JANIS ADAMS Date: 5.22.16	8881 DOUG VANDEN KB, CA 96148	sensonAr-vtoply@yahoo.com
Bailey Smith Date: 5/22/16	423 golden Kings Beach, CA	BaileyB13A@gmail.com
G A Okerman Date: 5-22-16	205 Hastings Ln Kings Beach	gregokerman2@yahoo.com
Martha Okerman Date: 5-22-16	205 Hastings Ln. Kings Beach CA	mokerman@hotmail.com
Josh [illegible] Date: 5-22-16	1274 Jerter CT Tahoe Vista	jr148@icloud.com
[illegible] Date: 5/22/16	PO Box 83 Tahoe Vista CA 96148	Waide11@charter.net
Heather Fortman Date: 5/22/16	289 E Agatam Tahoe Vista CA 96148	

California Clean Energy Committee

Petition for Resource and Energy Efficient Design

of Martis Valley West Draft EIR

Page 3 of _____

We, the undersigned, support the efforts of the California Clean Energy Committee that Placer County require robust energy conservation, reduced forest impacts, and environmental stewardship in the Martis Valley Specific Plan project:

Name	Address	Email
Michael Fortman Date: 5/22/16	289 E. Agatam Tahoe Vista, CA 96148	
Sandra Frey Date: 5/22/16	289 E. Agatam Tahoe Vista, CA 96148	mooomi of 3@gmail
John Christian Date: 5/22/16	1128 Regency Way Tahoe Vista, Ca	jbchris118@att.net
Barbara Christian Date: 5/22/16	1128 Regency Way Tahoe Vista, CA	jbchris118@att.net
Carolyn Johnson Date: 5/22/16	1190 Canterbury Dr Kings Beach CA	
B Welch Date: 5/22/16	12098 Kings Way KB, CA	
Date:		
Date:		

California Clean Energy Committee

1

Petition for Resource and Energy Efficient Design of Martis Valley West Draft EIR

Page _____ of _____

We, the undersigned, support the efforts of the California Clean Energy Committee and require Placer County to:

1. **REDUCE forest impacts and soil disturbance**
2. **HAVE NO ADVERSE biologic impacts**
3. **REQUIRE ANY development be located well below ridgelines in order that it NOT IMPACT scenic resources from Tahoe or Truckee**
4. **HAVE NO additional traffic and circulation impacts**
5. **HAVE NO negative impacts on the public's ability to evacuate the area in case of a fire or emergency.**
6. **PROVIDE Environmental stewardship and robust energy conservation in the Martis Valley Specific Plan Project**

Name	Address	Email
Richard Ramirez	P.O. Box 1720 Kings Beach, CA. 96143	R.T.@richardtownmusic.com
Brandon Beck	1321 Jester Court	mountainbeck@gmail.com
William Lee	608 Midiron Ave. Kings Bch	
Bill Pryor	96542 Tahoe Vista	
Kyle Okerman	10830 Palisades Dr. Truckee, CA 96161	
Mary McKenna	PO 3381 Incline Village NV 89450	

Petition for Resource and Energy Efficient Design of Martis Valley West Draft EIR (2)

Page _____ of _____

We, the undersigned, support the efforts of the California Clean Energy Committee and require Placer County to:

1. **REDUCE forest impacts and soil disturbance**
2. **HAVE NO ADVERSE biologic impacts**
3. **REQUIRE ANY development be located well below ridgelines in order that it NOT IMPACT scenic resources from Tahoe or Truckee**
4. **HAVE NO additional traffic and circulation impacts**
5. **HAVE NO negative impacts on the public's ability to evacuate the area in case of a fire or emergency.**
6. **PROVIDE Environmental stewardship and robust energy conservation in the Martis Valley Specific Plan Project**

Name	Address	Email
BRUNO Michael Bruno	mbruno78@yahoo.com	1100 Bristol Circle KB, 96143
GLORIA REID	PO1615 K.B.	
Michelle Bell	Icybell22@gmail.com	P.O. Box 81 Tahoe Vista. Ca. 96148
LARRY BOERNER	12777 KINGS WAY	LARRYMBOERNER@YAHOO.CO.
Daniel Soules	10368 Palisades dr. Truckee, CA 96161	daniel.soules@gmail.com
Jerome Barulich	P.O Box 31 Tahoe Vista 96148	

Petition for Resource and Energy Efficient Design of Martis Valley West Draft EIR (3)

Page _____ of _____

We, the undersigned, support the efforts of the California Clean Energy Committee and require Placer County to:

1. **REDUCE forest impacts and soil disturbance**
2. **HAVE NO ADVERSE biologic impacts**
3. **REQUIRE ANY development be located well below ridgelines in order that it NOT IMPACT scenic resources from Tahoe or Truckee**
4. **HAVE NO additional traffic and circulation impacts**
5. **HAVE NO negative impacts on the public's ability to evacuate the area in case of a fire or emergency.**
6. **PROVIDE Environmental stewardship and robust energy conservation in the Martis Valley Specific Plan Project**

Name	Address	Email
NAOMI BARULICH	PO BOX 31 TV CA 96148	nbsphoto@sbcglobal.net
Marjanne Casella	PO BOX 503 Tahoe Vista CA	
Julie Wainscoat	PO BOX 444 Kings Beach Ca	
John Wainscoat	P.O BOX 444 KINGS Beach CA	
Vern Lucas	PO BOX 43 TV 96148	
[illegible]	134 Laurel Dr TV CA	

Petition for Resource and Energy Efficient Design of Martis Valley West Draft EIR

Page _____ of _____

We, the undersigned, support the efforts of the California Clean Energy Committee and require Placer County to:

1. **REDUCE forest impacts and soil disturbance**
2. **HAVE NO ADVERSE biologic impacts**
3. **REQUIRE ANY development be located well below ridgelines in order that it NOT IMPACT scenic resources from Tahoe or Truckee**
4. **HAVE NO additional traffic and circulation impacts**
5. **HAVE NO negative impacts on the public's ability to evacuate the area in case of a fire or emergency.**
6. **PROVIDE Environmental stewardship and robust energy conservation in the Martis Valley Specific Plan Project**

Name	Address	Email
PAUL & JULIE CAVAGHAN	258 LAUREL DRIVE TAHOE VISTA CA	
John Cleadon	6468 Wild Rose Tahoe Vista	

5

Petition for Resource and Energy Efficient Design

of Martis Valley West Draft EIR

Page ____ of _____

We, the undersigned, support the efforts of the California Clean Energy Committee that Placer County require:

1. **Reduced forest impacts and soil disturbance**
2. **No adverse biologic impacts**
3. Require any development be located well below ridgelines in order that it **not impact scenic resources from Tahoe or Truckee**
4. **No additional traffic and circulation impacts**
5. **No negative impacts** on the public's ability to **evacuate the area in case of a fire**
6. **Environmental stewardship**
7. And robust **energy conservation** in the Martis Valley Specific Plan project:

Name	Address	Email
Mary Buxton	9710 Seaunt. Truckee Ca	mary.buxton@gmail.com
Marshall Perona	8598 Loch Levon Kings Beach	mperone76@hotmail.com
Hannah Steltzlen	1350 Grand Summit Dr. Reno, NV 89523	hsteltzlen@gmail.com
John Krasowski	8585 SW Canyon Lane, Apt. 28 Portland, OR 97225	jdkrasowski@gmail.com
James Cole	601 Beaver Street King Beach	james@exposurevault.com

California Clean Energy Committee

6

Petition for Resource and Energy Efficient Design

of Martis Valley West Draft EIR

Page ____ of _____

Name	Address	Email
Susan Gredvig	PO BOX 1175 Tahoe City, CA 96145	s-gred@hotmail.com
Tryant Gamble	4833 San Leandro Blvd. San Leandro, CA 94578	mgamble@gmail.com
Judy Ryan	P.O. BOX 2449 KB CA	

California Clean Energy Committee

University of Colorado
Denver

June 2, 2016

Ann Nichols
North Tahoe Preservation Alliance
P.O. Box 4
Crystal Bay, NV 89402

Eugene S. Wilson
California Clean Energy Committee
3502 Tanager Ave.
Davis, CA 95616

Dear Ms. Nichols and Mr. Wilson:
This letter is in response to your request that we explore and propose an alternative design for the West Martis Valley Specific Plan that would reduce the significant environmental impacts of the project. Our credentials are set forth in the curriculum vitae accompanying this letter. (Appendix A) PF14-7

Alternative Development Proposals for Martis Valley West
The Martis Valley West Parcel Specific Plan proposes to develop 662 acres within 1,052 acres on the West side of SR 267 while preserving 6,376 acres of land as open space on the East side of SR 267. The site is located midway between Truckee and the shore of Lake Tahoe. It is adjacent to the Northstar California Resort which sits to the Northwest of the proposed project. The development proposal calls for a mix of residential and commercial construction.
The proposed specific plan provides four land use goals and policies to guide the project:

- Goal LU-1: Create a residential community consistent with the vision, goals and policies of the Martis Valley Community Plan

Campus Box 126 | PO Box 173364 | Denver, CO 80217-3364
Phone 303 315 1000 | fax 303 315 1050 | jody.beck@ucdenver.edu, austin.troy@ucdenver.edu | http://cap.ucdenver.edu

- Goal LU-2: Preserve natural resources and features through dedication and protection of open space and development practices that are sensitive to the natural environment
- Goal LU-3: Maintain the quality of scenic vistas and minimize adverse effects on existing communities
- Goal LU-4: Maintain and enhance existing natural and recreational resources accessible to the public

PF14-7 cont.

(MVWPSP, Chpt. 3, pp 24-25.)

While the dedication of open space on the East side of SR 267 is admirable, the development as proposed on the West Parcel has impacts on the environment and the local population which are not necessary that can be mitigated through the implementation of design strategies based on clustered development and a wider range of housing typologies. The alternatives presented herein carry out the land use goals more effectively while offering significant improvements to project performance in terms of aesthetic impacts on the Lake Tahoe basin, the potential for trip reduction along SR 267 and reduced environmental impacts including greenhouse gas emissions.

Introduction to Alternative Proposals

The Lake Tahoe region is an ecologically sensitive area that is widely enjoyed for its scenic beauty and relatively undeveloped character. We believe that the beauty and character of the area can sustain limited development which minimizes resource usage and environmental impacts while maximizing the area of undeveloped and publicly accessible land.

This report describes a series of four alternatives to the development proposal described in the Martis Valley West Parcel Specific Plan all of which achieve improvements in the aesthetic, trip generation and environmental performance of the project – including a reduction in greenhouse gas emissions and an increase in the carbon sequestration capacity of the site. Protecting the viewshed to Lake Tahoe and developing a walkable transit-oriented development are the primary tools used to achieve these improvements. These tools set our proposed development area boundary and generated a clustering concept for the project.

Aesthetic Performance of Alternative Proposals

We began our analysis by performing a viewshed analysis. Viewshed analysis is line-of-sight analysis using the topography of the site to describe viewshed boundaries for the site based on allowable heights for the potential building typologies.

PF14-7 cont.

Using this analysis we marked 75' viewshed and 50' viewshed lines on the drawings in keeping with the goals of the MVWPSP for scenic views and setbacks from ridges. (MVWPSP, App. B, pp. 5 & 9.)

While the original design as indicated in the MVWPSP and the associated EIR remained outside of the TRPA boundary, this does not mean that the development would not be visible from within the basin. Performing a viewshed analysis such as the study which informs our proposal is the most rigorous way to address visibility.

The viewshed lines shown on the drawings indicate areas where buildings of 50 feet and 75 feet, placed to the North of the lines, will not be visible from the viewpoints in the basin as indicated on the map in Appendix B which describes the viewshed analysis methodology.

All of the proposed alternatives restrict development to the area within the indicated boundaries in order to improve the aesthetic performance of the project by protecting the view from Lake Tahoe from any intrusion by development.

In addition, restricting development to the area within the boundaries defined by the viewshed analysis keeps construction one-half mile from the Rim Trail.

Alternative Proposals

Our first attempt to fit the proposed development within the viewshed protected area can be seen on Sheet 1, which is not likely to be satisfactory to anyone involved including the developer, community members or future residents. (Attachment A, sheet1.)

Following this exercise, we developed two site layout strategies that we feel better address the community form concept set forth in the proposed MVWPSP--

> The MVWPSP community is envisioned as a high quality environment that accounts for respect for the site and its natural resources, connects to the outdoors, and incorporates recreation programs. New development will provide direct access to hiking, biking, cross-country trails, as well as an outdoor lifestyle. An assortment of on-site recreational community facilities will be sited appropriately to provide access to the differing terrain within the plan area.

PF14-7 cont.

(MVWPSP, App. B, p. 5.) These strategies also better serve the MVWPSP guiding goals regarding trails and recreation space (MVPSP, Chpt. 2, p. 18.) than either the design concept in the MVWPSP as elaborated in the EIR as shown in Appendix C or the development plan shown on Sheet 1 in Attachment A. The two site strategies that we developed are each presented in two permutation. Alternatives 1A and 2A provide 760 units while Alternatives 1B and 2B each provide 418 units. (Attachment A, sheets 2A, 2B, 3A and 3B) The 760 unit versions are consistent with the project proposal while the 418 unit versions are consistent with the reduced density alternative discussed in the EIR.

All four versions demonstrate that clustering development decreases environmental impacts and meets the community character goals as stated in the MVWPSP better than does the sprawling single family development as envisioned. (MVWPSP, App. B, p. 6.) Our goal was not merely to reduce the scope of development on the site but at the same time to generate site strategies that provide a quality of life which would be attractive to people who valued the Lake Tahoe region. Not only do these site strategies have the positive impacts on project's environmental performance listed above and described in detail below, but they also provide residential sites that have more immediate access to large undeveloped areas for recreation–the presumed reason that people are coming to spend time in the area.

In addition, the residential units of the typologies included and in the layouts proposed generate less stormwater, require less soil disturbance, have lower embodied green-house gas emissions and do not impinge on the view from Lake Tahoe.

Site Design Strategies

The design team developed two distinct strategies for the additional forest land that would be preserved. Alternatives 1A and 1B locate most of the preserved land to the South and East of the residential area while maintaining an internal forest-park which would be a significant amenity for the residents. It is imagined that the residential units in these option would be designed so that residents would park their car on the auto-oriented side of the residence but primarily use the forest-side entrance which would open directly to this shared amenity while at home. This internal forest-park would have hiking and biking trails in the summer and space for cross-country skiing in the winter, both of which would connect directly to the Rim Trail. PF14-7 cont.

Alternatives 2A and 2B take a different approach and maintain the additional preserved open space as a large internal forest rather than preserving it at the perimeter. While this option takes up more of the perimeter of the site within the 75' and 50' viewshed lines, it has the advantage of giving residents a larger semi-public space and separates the residential clusters from each other by greater margins. Alternatives 2A and 2B would have the same access to recreational trails as 1A and 1B but individual units would have less immediate access.

Mix of Housing Typologies Considered

As demonstrated by the project layout on Sheet 1, the aesthetic experience of fitting 760 single family into the proposed viewshed protected boundary based on our viewshed analysis is unappealing. Based on this initial exploration and on other adverse environmental impacts projected by the EIR, we explored alternatives based on reducing the number of units on site and changing the unit mix of the project. We are proposing two walkable cluster-oriented development strategies with a higher percentage of condominiums, townhomes and cabins. Each of our two strategies has been designed for 760 units (alternatives 1A and 2A) and 418 units (alternatives 1B and 2B). Instead of using the range of probable unit mixes given in table 3.2 (p. 27 of the MVWPSP), we decided that an equal mix of condominiums, townhouses, cabins and single family homes would best meet the project goals. While there is some flexibility in the mix of unit types, the

dominant housing type cannot be large-lot single family homes without sacrificing the benefits of the options presented here. We realize that the developer will have to maintain some control over the final unit mix on the site as a whole, but the changed unit mix is unavoidable if the project is to achieve the improvements in project performance discussed here. This control will need to be achieved through restrictions on the site which would attach to any conveyance of property on the site to subdevelopers and other potential purchasers. PF14-7 cont.

We have made the following assumptions about unit characteristics and have assumed that all housing typologies would be built to their maximum code-specified height as specified in the proposed MVWPSP.

We have not followed the MVWPSP proposal of two parking spots per unit plus up to two visitor spots per unit. (MVWPSP, App. B, p. B11) We feel that this is an excessive amount of parking and would result in far more paving on site than is warranted given the desire to remain sensitive to the natural environment as stated in project goal LU-2 (MVWPSP, Chpt. 3, pp 24-25.) – especially when only twenty percent of the units are projected to be permanently occupied. We also don't expect that parking will realistically be placed underground given the costs and spatial implications of doing so and so have shown all parking as surface parking.

The following table represents the residential unit sizes on which our analysis is based.

	Footprint	Number of Stories	Unit Size	Parking Spaces
MVWPSP SF	2,500 s.f.	2	5,000 s.f.	3 (avg)
Single Family	2,500 s.f.	2	5,000 s.f.	2
Cabin	1,500 s.f.	2	3,000 s.f.	2
Townhome	750 s.f.	2	1,500 s.f.	2
Condominium (30 units)	9,450 s.f. (315 s.f. avg)	3 (1 ea)	28,350 s.f. (1,000 s.f. ea)	1.5 (avg)

table 1

Trip Reduction Potential of Alternative Proposals

Organizing the project around clustered development to increase the potential for successful transit use was our second significant design concept in addition to viewshed protection. Since traffic congestion on SR 267 is an important local issue and a significant adverse impact of the proposed MVWPSP, we felt that trip reduction should be a guiding principle in the design. (DEIR, p. 10-43.) PF14-7 cont.

It is unlikely that the project, if built out with predominantly large-lot single family homes, would successfully encourage the use of transit, even with the inclusion of the bus stop adjacent to SR 267. It seems improbably that people would pack up their gear, drive their private cars a very short distance to the transit stop at the entry to the development, park, unpack and wait for the bus. In all likelihood, they would stay in their car once packed for the day and simply drive to their destination.

Therefore, transit is more likely to be successful if people can reasonably walk to the transit stops. For this reason, we are proposing that a transit stop should be included in the development itself, replacing or augmenting the transit stop shown at the project entry. In addition to the main transit stop as shown, all residential units are clustered such that they are one-quarter of a mile or less from the main road and potential additional supplemental transit stops.

We envision these transit stops being served by either the public bus which makes a trip into the development on its standard route or by a shuttle. A shuttle option is currently written into the MVWPSP, though it is indexed to reaching approximately fifty percent build out of the project. (MVWPSP, Chpt. 4, p. 38.) The proposed shuttle route is not established however and needs to either be tied to the bus schedule along SR 267 or circulate between appropriate seasonal destinations, or – ideally – both.

We feel that this organization around the possibility of walkable transit options is particularly essential given the low probability that any commercial development will be successful in Martis Valley West. In our analysis, there is little if any likelihood that the limited commercial activity that may occur within the development will generate any internal trip capture. Given the low total number of residences and the acknowledgement that even the estimate of 20% permanent residency is high (DEIR, p. 10-21.), there are not enough people in the

development to support retail or commercial uses that will likely allow any local trip capture.

Based on typical retail outlet ratio to population in California, twenty percent permanent occupation plus fifty percent occupation of the seasonal or part-time residences will support only one restaurant and no other commercial or retail including grocery stores, drug stores or food and drink outlets. The expected permanent residents, even at twenty percent of the total, will not support any restaurant or any commercial or retail development. (see Appendix D for additional analysis and information regarding commercial potential within this development) PF14-7 cont.

Another option to reduce traffic on SR 267 is a transverse lift from the project to the Northstar California Resort. Our alternative proposals have located the main transit stop internal to the project adjacent to any potential restaurant that would open on site along the edge of the project where such a transverse lift could originate. This possibility, along with the clustering of residential units within the development and the potential for an on-site shuttle, would give at least some of the units ski-in / ski-out access.

Should neither the public bus stop shift to our proposed location nor the shuttle option materialize, it should be noted that the proposed transit stop along SR 267 would have more potential to reduce traffic on SR 267 than would not having one. Additionally, should the transit improvement suggestions not materialize, the clustering of homes as indicated still makes sense based on the associated aesthetic performance improvement and environmental benefits.

Environmental Benefits of Alternatives

In addition to the benefits that these designs offer with regard to protecting the viewshed of Lake Tahoe, for trip reduction on SR 267 and for enhanced shared outdoor amenities for residents, these layouts also have significant and positive impacts on the environmental performance of the site. Reducing the residential footprint of the development and proposing a denser settlement pattern with a higher percentage of joined units and fewer parking spots improves the

environmental performance of the project with regard to carbon sequestration, habitat preservation, greenhouse gas emissions and stormwater generation.

Table 2 describes the difference between alternatives 1A, 1B, 2A, 2B and the original MVWPSP plan in terms of total acres dedicated to residential zoning, total road length and total built floor area.

PF14-7 cont.

	Residential zone (acres)	% of MVWPSP acres	Road length (miles)	% of MVWPSP road length	Total built floor area (s.f.)	% of MVWPSP total built floor area
MVWPSP plan	621	100%	10.5	100%	3,800,000	100%
Option 1A	497	80%	9.4	89%	2,004,000	53%
Option 1B	405	65%	6.7	64%	1,094,000	39%
Option 2A	429	69%	10.1	96%	2,004,000	53%
Option 2B	392	63%	8.1	77%	1,094,000	39%

table 2

Greenhouse Gas Reduction

There are several sources of greenhouse gas reduction associated with the alternative project proposals. The most significant reduction in greenhouse gas emissions associated with the project is related to the embodied greenhouse gas emissions associated with construction. Seattle has released a spreadsheet for calculating embodied greenhouse gas emissions to facilitate compliance with the Washington State Environmental Policy Act (SEPA). The following estimates of embodied greenhouse gas emissions per housing typology included in this proposal are as follows: condominiums, 33 MTCO2/unit; townhomes, 54 MTCO2/unit; cabins and single family homes, 38.7 MTCO2/1000 s.f.

In addition, there are significant greenhouse gas emissions related to road construction. The reduction in paved area also provides a significant reduction. The SEPA worksheet estimates that there are 50 MTCO2/1000 s.f. paving.

The embodied greenhouse gas emissions associated with the four project proposals and the plan from the MVWPSP are as follows.

	Embodied MTCO2, buildings	Embodied MTCO2, roads	Total embodied MTCO2	% reduction relative to MVWPSP
MVWPSP	147,060	116,954	264,014	0%
1A	75,767	81,304	157,071	41%
1B	41,339	89,692	131,031	50%
2A	75,767	92,516	168,283	36%
2B	41,339	95,767	137,106	48%

PF14-7 cont.

table 3

In addition, there will be reductions in greenhouse gas emissions to the degree that the transverse lift and the transit options reduce car trips on SR 267. These reductions can be described qualitatively. Increasing the use of shared transit options to reach nearby destinations and the use of a transverse lift for direct access to Northstar will both reduce automobile trips and therefore reduce greenhouse gas emissions. Similarly, there will be ongoing energy usage associated with the residential occupancy. There will be some level of energy demand, and therefore associated greenhouse gas emissions, for all residential units whether occupied permanently or seasonally. Reducing the total area of construction in the project will reduce the energy demand associated with maintaining these residences, and in particular the energy required by climate control systems.

Stormwater Reduction

The combination of a unit mix we have selected, a clustered development strategy which reduces road length, and a reduction in the number of parking spots expected per residential unit have significant positive impacts on the percentage of the site which is covered with impervious surfaces.

	Street area (s.f.)	Building Footprint (s.f.)	Other Impervious (s.f.)	Total Impervious (s.f.)	% reduction relative to MVWPSP	Impervious % of site
MVWPSP	1,670,280	1,900,000	668,800	4,239,080	0%	14%
1A	1,062,810	968,700	563,264	2,594,774	39%	8%
1B	1,484,370	530,350	309,472	2,324,192	45%	7%
2A	1,287,060	968,700	563,264	2,819,024	33%	9%
2B	1,605,870	530,350	309,472	2,445,692	42%	8%

table 4

PF14-7 cont.

This reduction in impervious surfaces translates into significant and positive impacts on stormwater management. In addition, the reduction in stormwater generation also reduces the potential for erosion.

	Avg annual runoff (in)	Days per Year w Runoff	% wet days retained	Smallest rainfall with runoff (in)	Largest rainfall without runoff (in)	Max rainfall retained (in)
MVWPSP	3.62	11.39	83.39	0.70	0.80	4.81
1A	2.07	4.10	94.01	1.25	1.20	5.14
1B	1.81	2.80	95.91	1.43	1.50	5.20
2A	2.33	5.30	92.26	1.10	1.10	5.09
2B	2.07	4.10	94.01	1.25	1.20	5.14

table 5

Carbon Sequestration

Forests sequester significant amounts of carbon and removing trees is not the only impact of developing land for residential use. This development releases carbon into the atmosphere and, perhaps more importantly, reduces the capacity of the site to act as a carbon sink. Without further study and much more detailed designs, the impact of these proposals on each of the categories of carbon sequestration in forests cannot be individually ascertained. This report uses the percentage of removed trees by land use as specified in Appendix E, West Parcel Development Area Tree Summary, to establish a percentage of carbon sequestration loss to apply to these development proposals. This appendix estimates that 47% of the existing trees will be lost to development under the MVWPSP proposal, and we are applying that to all of the design proposals.

PF14-7 cont.

	Live trees, above/ below ground	Dead trees, standing/ down	Forest floor and understory	Soil organic carbon	Total sequestered carbon	47% loss of sequestered carbon	% improvement over MVWPSP
MVWPSP	3595	1046	1624	2003	8268	3886	0%
1A	2279	633	1063	1320	5295	2489	36%
1B	2001	557	931	1152	4641	2181	44%
2A	2152	612	1002	1251	5017	2358	39%
2B	2065	590	965	1204	4824	2267	42%

table 6

Conclusion

The Lake Tahoe region is an attractive area and development is expected to continue in the region. While any development will have adverse impacts, these can be mitigated with quality design. Quality design should take into account the overall resource usage implications of the project as well as the site-specific impacts on both human and natural systems.

The design proposals put forward in this report offer significant performance improvements over the proposal in the Martis Valley West Parcel specific plan. These improvements are achieved by including a mix of housing types that is not heavily weighted toward large-lot single-family homes and by implementing a site layout based on a clustering strategy rather than dispersed lots. PF14-7 cont.

Not only do these site proposals offer significant aesthetic improvements with regard to visibility from the Lake Tahoe basin, the potential for trip reduction along SR 267 and noteworthy improvements in environmental performance in the form of reduced GHG emissions, reduces stormwater generation and increased carbon sequestration but they also offer significant amenities in the form of large open spaces which can remain in their wooded state which are woven into the residential fabric of the site – providing more immediate access for project residents to the environment of the Lake Tahoe region.

It is our belief that these proposals offer a balanced approach to allowing for development and quality residential experiences while respecting the local and global environment as well as the existing residents of the region.

Jody Beck, Assistant Professor, Department of Landscape Architecture
University of Colorado Denver

Austin Troy, Professor, Department of Planning and Design
University of Colorado Denver

Jody Beck, Ph.D.

College of Architecture and Planning
University of Colorado Denver
Campus Box 126, PO Box 173364
Denver, CO 80217-3364

2636 East 11th Avenue
Denver, CO 80206

PF14-7 cont.

Education

2009 Doctor of Philosophy, University of Pennsylvania, Architecture
Dissertation: "John Nolen and the Political Ordering of Landscapes"

1995 Bachelor of Architecture, Rice University, Architecture

Professional Experience

2016 – present PhD Program Director, College of Architecture and Planning, UC Denver

2011 – present Assistant Professor: Department of Landscape Architecture, College of Architecture and Planning, UC Denver

1999 – present Jody Beck: Registered Architect

2004 – 2007 Research Assistant: Center for Innovation in Affordable Housing, Praxis, University of Pennsylvania School of Design
production of monthly affordable housing design newsletter

2003 – 2007 Research Architect: Center for Architecture and Building Science Research, New Jersey Institute of Technology
www.rehabadvisor.org, project oversight of HUD funded research
www.designadvisor.org, support for Demystifying Density lectures

Publication - Peer Reviewed Book

2013 *John Nolen and the Metropolitan Landscape*

Funded Grants and Grant Applications Submitted

April 2014 *Pilot study: Inventory of the Urban Agricultural Potential for the Denver Metropolitan Area;* University of Colorado Denver, Office of Research Services
$3,000 requested, $2,500 funded
student research assistant Brittain Alison

March 2014 *Inventory of Urban Agricultural Potential for the Denver Metropolitan Area*
University of Colorado Denver, Center for Faculty Development
$10,000 requested, not funded

2006 Grosser Research Fund in Urban Land Use, University of Pennsylvania

Publications: Non-Peer Reviewed

2011 Beck, Jody. "When the Wells Run Dry," *Landscape Architecture New Zealand*, (Autumn 2011); n.9: p.10-12

2010	Beck, Jody. "Landscape and Sustainability," *Topos: The International Review of Landscape Architecture and Urban Design. 70* (2010):104-105
2004	Beck, Jody and Evans, Deane. "Good Design: The Best Kept Secret in Community Development," pamphlet distributed by the Local Initiatives Support Corporation
2004 – 2006	Beck, Jody and Evans, Deane. "Design Updates," *Campaign for Excellence in Affordable Housing*, distributed monthly by e-mail to over 10,000 individuals involved in community design

PF14-7 cont.

Presentations at Meetings and Conferences: Peer Reviewed

Sept. 2015	"Food Sovereignty, Diet and Land Use Patterns", paper presented Fourth International Conference on Food Studies, Blacksburg
March 2015	"Radicalizing Land Suitability Studies for Urban Agriculture, paper presented Council of Educators in Landscape Architecture annual conference, Kansas
March 2014	"Research as Service Learning: Food on the Front Range," paper presented Council of Educators in Landscape Architecture annual conference, Baltimore
Nov. 2010	"Local Food Networks: A Source of Place-Based Community," paper presented, 48th Annual Making Cities Liveable Conference, Charlotte

Memberships and offices held in professional societies and associations

2014 – present	*Architects, Designers and Planners for Social Responsibility* Member of Board of Directors and Board Secretary for three year term, by invitation and confirmation of board
2007 – 2009	*Association for Community Design*, Vice President

PhD Dissertation Supervision

enrolling 2016	Nermeen Dalgamoni, College of Architecture and Planning PhD program, *"Food Sovereignty in the Middle East: A Framework for Cooperation between States"*

PhD Dissertation Committee Membership

grad. 2011	Robert Kraus; Lincoln University, Dept. of Env. Management *"All for Naught; Zero Waste Initiatives by Local Governments in New Zealand"*

Master's Thesis Supervision

grad. 2015	Atalya Kozak, UC Denver, Department of Landscape Architecture *"Urban Agriculture in Shanghai"*
grad. 2011	Matt Durning; Lincoln University, Dept. of Landscape Architecture *"The Urban Agricultural Potential of Christchurch"*
grad. 2010	Rebecca Fifield; Lincoln University, Dept. of Landscape Architecture *"An Integrated Stormwater System for the Avon River"*

Austin R. Troy, Ph.D.

Professor and Chair, University of Colorado Denver, Department of Planning and Design
Austin.troy@ucdenver.edu. 303-315-1006.

PF14-7 cont.

Educational Background:

University of California, Berkeley, Department of Environmental Science, Policy and Management. Ph.D. in environmental policy and economics, 2001.

Yale School of Forestry and Environmental Studies: Master of Forestry, 1995.

Yale University: B.A. 1992; major in anthropology.

Academic Appointments:

August 2013- current: Professor and Chair, University of Colorado, Denver, Department of Planning and Design (Associate Professor from 2013-2015).

September 2001- August 2013: Assistant and Associate Professor, University of Vermont, Rubenstein School of Environment and Natural Resources.

Professional and Consulting Experience:

12/99- present: Principal and Co-Founder, *Spatial Informatics Group, LLC (SIG), San Leandro, CA.* As a co-founder and Principal, I have been involved in over a dozen consulting projects for clients in the private, NGO and governmental sectors, with emphases on ecosystem service evaluation and mapping.

Selected Relevant Peer Reviewed Publications

C. Harvey, L. Aultman-Hall, S. Hurley and **A. Troy**. *Accepted*. Streetscape skeleton measurement and classification. Environment and Planning B.

A. Troy, A. Nunnery and J.M. Grove. 2016. The relationship between residential yard management and neighborhood crime: An analysis from Baltimore City and County. Landscape and Urban Planning. 147: 78-87.

C. Harvey, L. Aultman-Hall, S. Hurley and **A. Troy**. 2015. Effects of skeletal streetscape design on perceived safety. Landscape and Urban Planning. 142: 18-28.

K. Bagstad, J. Reed, D. Semmens, B. Sherrouse, and **A. Troy**. 2015. Linking biophysical models and public preferences for ecosystem service assessments: A case study for the Southern Rocky Mountains. Regional Environmental Change. 1-14.

C. Morse, A. Strong, E. Mendez, S. Lovell, **A. Troy**, W. Morris. 2014. Performing a New England Landscape: Viewing, Engaging, and Belonging. Journal of Rural Studies. 36: 226-236.

D. Azaria, **A. Troy**, B. Lee, C. Ventriss, and B. Voigt. 2013. Modeling the effects of an urban growth boundary on vehicle travel in a small metropolitan area. Environment and Planning B. 40(5): 846-864.

A. Troy. 2012. The Very Hungry City. New Haven: Yale University Press. 384 pp.

A.Troy, D. Azaria, B. Voigt and A. Sadek. 2012. Integrating a traffic router and microsimulator into a land use and travel demand model. Transportation Planning and Technology. 35(8): 737-751

A. Troy, J.M. Grove and J. O'Neil-Dunne. 2012. The Relationship between Tree Canopy and Crime Rates across an Urban-Rural Gradient in the Greater Baltimore Region. Landscape and Urban Planning. 106: 262-270.

D. Locke, J.M. Grove, J.W. Lu, **A. Troy**, J.P. O'Neil-Dunne, and B. Beck. 2011. Prioritizing preferable locations for increasing urban tree canopy in New York City. Cities and the Environment. 3(1).

S. Liu, R. Costanza, **A. Troy**, J. D'Agostino, and W. Mates. 2010. Valuing New Jersey's Ecosystem Services and Natural Capital: a Spatially Explicit Benefit Transfer Approach. Environmental Management. 45(6): 1271-1285.

S. Liu, R. Costanza, S. Farber and **A. Troy**. 2010. Valuing ecosystem services: theory, practice and the need for transdisciplinary synthesis. Annals of the New York Academy of Science. 1185:54-78.

W. Zhou and **A. Troy**. 2009. Development of an object-based framework for classifying and inventorying human-dominated forest ecosystems. International Journal of Remote Sensing. 30(23):6343-6360.

A. **Troy** and J.M. Grove. 2008. Property Values, parks, and crime: a hedonic analysis in Baltimore, MD. Landscape and Urban Planning. 87:233-245.

W. Zhou, and A. **Troy**. 2008. An Object-oriented Approach for analyzing and characterizing urban landscape at the parcel level. International Journal of Remote Sensing. 29 (11):3119-3135.

W. Zhou, A. **Troy** and J.M Grove. 2008. Modeling residential lawn fertilization practices: Integrating high resolution remote sensing with socioeconomic data. Environmental Management. 41(5):742-752 PF14-7 cont.

A. **Troy**, J.M. Grove, J. O'Neil-Dunne, M. Cadenasso, and S. Pickett. 2007. Predicting opportunities for greening and patterns of vegetation on private urban lands. Environmental Management. 40(3): 394-412.

A. **Troy**. 2007. The evolution of watershed management in the United States. *In:* J.Erickson (ed.), Sustainable Watershed Management in Theory and Practice. Amsterdam: Elsevier Science Publishers.

A. **Troy**. 2007. A tale of two policies: California programs that unintentionally promote development in wildland fire hazard zones. *In:* A. Troy and R. Kennedy (eds.), Living on the Edge: Economic, Institutional and Management Perspectives on Wildfire Hazard in the Urban Interface. Amsterdam: Elsevier Science Publishers. Pp. 127-142

A. **Troy** and J. Romm. 2007. The effects of wildfire disclosure and occurrence on property markets in California. *In:* A. Troy and R. Kennedy (eds.), Living on the Edge: Economic, Institutional and Management Perspectives on Wildfire Hazard in the Urban Interface. Amsterdam: Elsevier Science Publishers. Pp.101-120.

A. **Troy** and M. Wilson. 2006. Mapping ecosystem services values: Practical challenges and opportunities in bridging GIS and value transfer. Ecological Economics 60: 435-449.

J. M. Grove, A. **Troy**, J. O'Neil-Dunne, S. Pickett and M. Cadenasso. 2006. Multi-dimensional characteristics of urban households and its implications for the vegetative structure of urban ecosystems. Ecosystems. 9(4): 578-597.

S. Farber, R. Costanza, D. Childers, J. Erickson, K. Gross, M. Grove, C. Hopkinson, J. Kahn, S. Pincetl, A. **Troy**, P. Warren and M. Wilson. 2006. Linking ecology and economics for ecosystem management: A services-based approach with illustrations from LTER sites. Bioscience. 56(2): 121-134.

A. **Troy**, A. Strong, T. Donovan, S. Bosworth, N. Buckley, and M.L. Wilson. 2005. Farmer attitudes towards bird-friendly hayfield management practices. Wildlife Society Bulletin. 33(2):528-538.

A. **Troy** and J. Romm. 2004. The Role of Disclosure in the flood zone: Assessing the price effects of the California Natural Hazard Disclosure Law (AB 1195). Journal of Environmental Planning and Management. 47(1): 137-162.

M. Wilson, A. **Troy**, and R. Costanza. 2004. The Geography of ecosystem services: Maximizing the value of landscapes in land use conservation. *In*: M. Dietrich and J. van der Straaten (eds). Cultural Landscapes. Dordreeth, Netherlands: Kluwer Academic Publishers. Pp: 69-94

Selected Research Grants

University of Vermont Transportation Center/ US Department of Transportation. A. **Troy**, Principal Investigator. 2007-2013. $371,747. Integrated Land-Use, Transportation and Environmental Modeling: Complex Systems Approaches and Advanced Policy Applications

USDA Forest Service cooperative agreement. A. **Troy**, Principal Investigator. 2006-2011. $423,000. Development of advanced spatial analyses for examining the relationships among social groups, land management, and vegetation structure and processes at the parcel level in urban areas.

US Department of Transportation, Federal Highway Administration. A. **Troy**, Principal Investigator. 2006-2009. $250,500. Dynamic Transportation and Land Use Modeling.

State of New Jersey. A. **Troy**, Co-Principal Investigator (PI: Robert Costanza). 2004-2005. $160,000. Valuing New Jersey's Natural Capital and Ecosystem Services.

US EPA STAR Watershed Classification Grant. A. **Troy**, Co-Principal Investigator (PI: Mary Watzin). 2003-2006. $664,000. Linking Land Use Change, Stream Geomorphology, and Aquatic Biodiversity in a Hierarchical Classification Scheme.

Methodology for Site Parameters

Streams

Stream corridors shown on site were determined by a flow accumulation analysis of a USGS National Elevation Dataset (USGS NED n40w121 1/3 arc-second 2013 1 x 1 degree Arc Grid) through the use of ArcGIS software. Of the streams determined through this assessment, there are only two which are classified within the USGS hydrography dataset as an intermittent stream (accessed 02/19/2016), West Martis Creek on the south side of the the basin, and Martis Creek on the north side of the ridge. PF14-7 cont.

Placer County Code §17.54.130 (D)(1-4) outlines required setbacks from watercourses. Any watercourse shown on a USGS topographic map requires a fixed setback depending on the classification of the stream (permanent vs intermittent). Permanent streams require a minimum setback of one hundred feet from the centerline of the watercourse, intermittent streams require a setback of fifty feet from the high-water line of respective watercourse.

Trails

All trails were digitized through observation of National Agricultural Inventory Program aerial photographs dated December 3, 2014. Changes in vegetation cover, seasonal use, and trail users can impact how visible a hiking, biking, or snow-mobile trail is within aerial photographs. It is possible that trails exist on the site that were not picked up through this digitizing method. Site confirmation of trail locations is recommended.

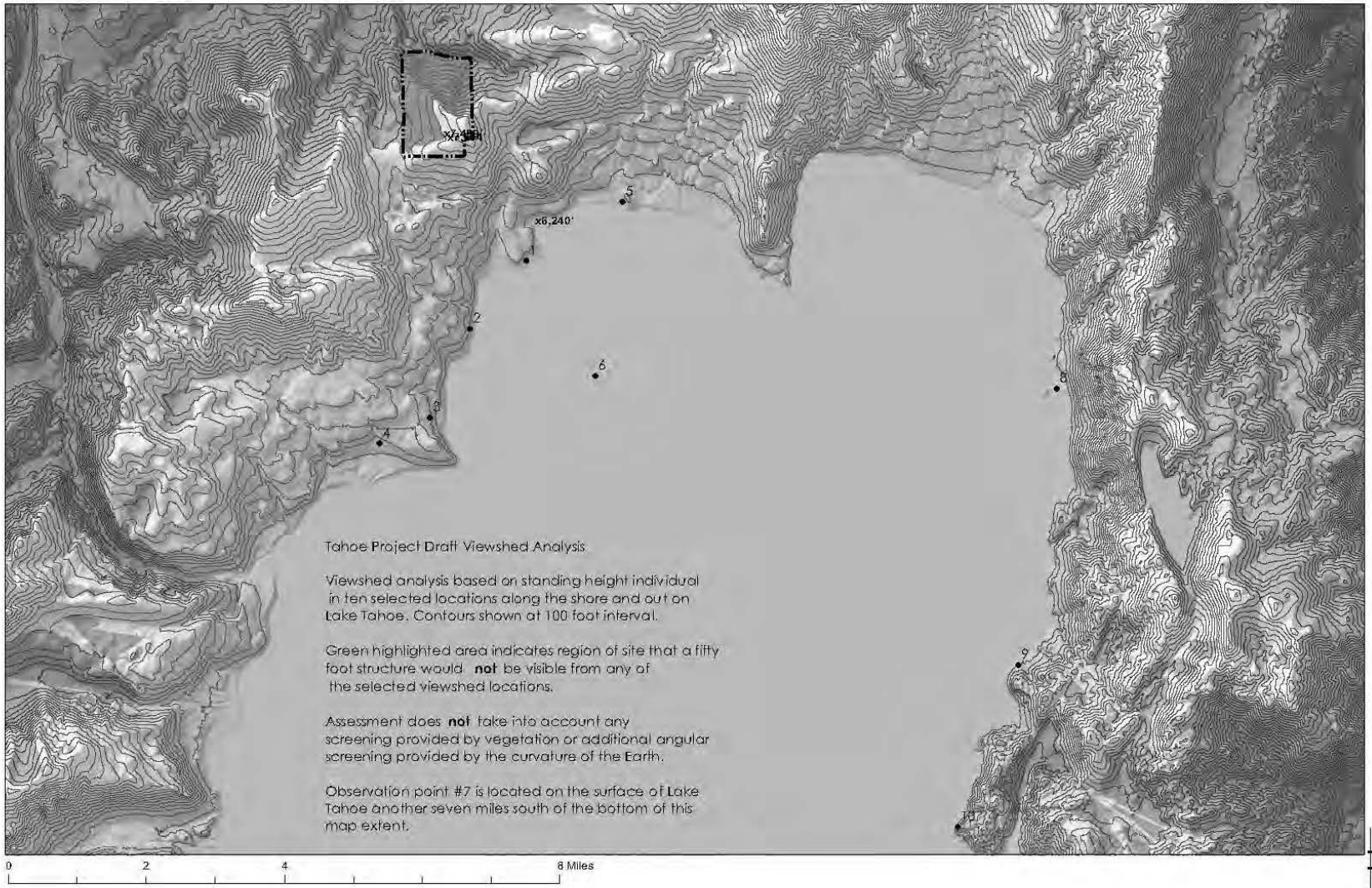
Viewshed

Viewshed analysis was conducted using USGS Nataional Elevation Dataset, Digital Elevation Models (USGS NED n40w121 1/3 arc-second 2013 1 x 1 degree Arc Grid and USGS NED n40w120 1/3 arc-second 2013 1 x 1 degree Arc Grid). Final assessment based on observer point analysis assuming a five foot, nine inch observer height at a series of ten selected locations. This analysis was repeated twice, once for an assumed fifty-foot structure, and again for an assumed seventy-five-foot structure. This method of analysis does not take into account any screening provided by adjacent vegetation or any additional angular screening provided by the curvature of the earth.

Slope

Slope analysis conducting using USGS National Elevation Dataset (USGS NED n40w121 1/3 arc-second 2013 1 x 1 degree Arc Grid) through the use of ArcGIS software. Assumed breaks at 25% grade and 12.5% grade. Specific setback and development limitation standards can be found within the Placer County Zoning Code.

PF14-7 cont.


x6,240'
1
2
3
4
5
6
7
8
9
10
Tahoe Project Draft Viewshed Analysis
Viewshed analysis based on standing height individual in ten selected locations along the shore and out on Lake Tahoe. Contours shown at 100 foot interval.
Green highlighted area indicates region of site that a fifty foot structure would **not** be visible from any of the selected viewshed locations.
Assessment does **not** take into account any screening provided by vegetation or additional angular screening provided by the curvature of the Earth.
Observation point #7 is located on the surface of Lake Tahoe another seven miles south of the bottom of this map extent.
0
2
4
8 Miles

PF14-7
cont.

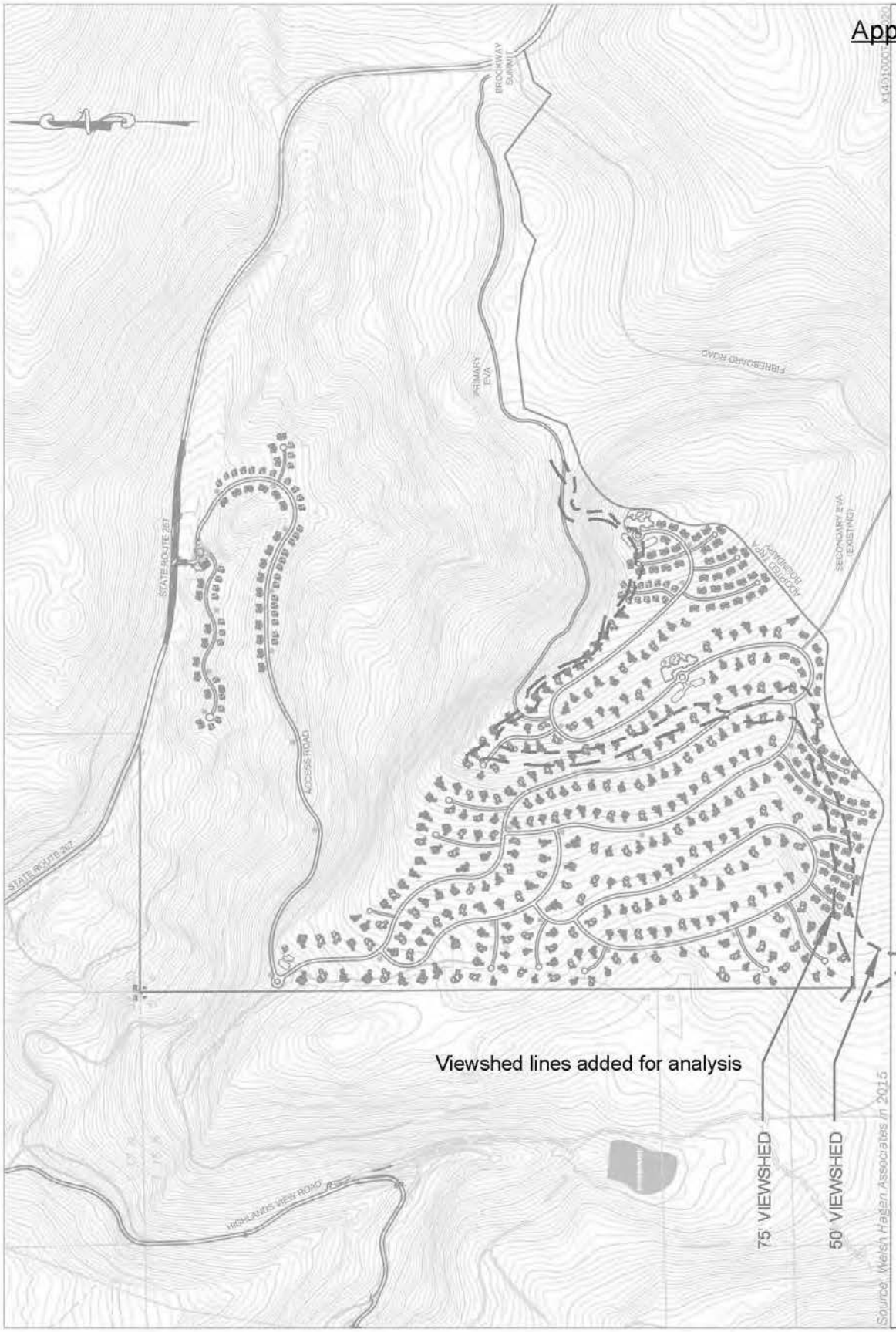


Exhibit 9-26

Conceptual Site Plan Used to Simulate Buildout of the Project Site

PF14-7 cont.

It is unlikely that significant commercial developments will be successful in the Martis Valley West development and furthermore that it is even more unlikely that any commercial development would reduce trips to any significant degree.

There are two options under consideration for total unit build-out in the Martis Valley West development, 760 and 418 housing units. The EIR for the project assumes 2.5 people per dwelling unit which calculates to 1900 people for the larger development proposal and 1045 people for the smaller development. However, the EIR also assumes that only 20% of the housing units would be occupied by full-time residents and that the other 80% would be seasonal or fractional units. The larger development proposal will generate only 380 permanent residents and the smaller development proposal will generate only 209 permanent residents. There is not significant data to project the number of people who will be occupying the seasonal or fractional units at a given time, so we will analyze population at permanent residents only, 50% seasonal units occupied in addition to permanent residents and full occupation. PF14-7 cont.

	Permanent residents (20%)	Permanent residents (20%) + ½ Seasonal (40%) [60% total]	Full occupancy (100%)
760 units	380	1,140	1,900
418 units	209	627	1,045

We have used U.S. census data to determine the number of establishments per capita in California for a selection of commercial establishment types that would potentially capture auto trips. This is not meant to be an exhaustive list of potential commercial, merely a representative list of establishments that we felt would represent the highest potential for local trip capture. Establishment per capita statistics at the state level indicate a reasonable expectation for population required to support commercial establishments by type.

Establishment Type	# Establishments in CA	Establishments per capita
Restaurants and Other Eating Places	65,013	585
Food Services and Drinking Places	71,989	528
Drinking Places (Alcoholic Beverages)	3,197	11,899
Supermarkets and Other Grocery Stores	8,076	4,710
Food and Beverage Stores	16,864	2,256
Convenience Stores	2,301	16,533
Gasoline Stores	8,041	4,731
Pharmacies and Drug Stores	4,431	8,585
Book Stores and News Dealers	768	49,533

As is clear from comparing the two tables above, there are not enough permanent residents in either development option to support any commercial establishments. 60% of the total build-out capacity of the smaller development will support one restaurant. Full build-out of the smaller development proposal or 60% of the total capacity of the larger development would be required to support two restaurants. Full occupancy of the larger development will support three restaurants. There is no

scenario that will support a grocery store of any size, a drug store, a drinking establishment, a gasoline station or a book store.

Furthermore, these population numbers are based on complete construction of the projected number of units. The developer proposes that this project will build out over the next twenty years, further decreasing the likelihood of successful commercial development within Martis Valley West in the near future. Since the developer is not going to be building the commercial property themselves, but rather selling property to a commercial property developer it is highly unlikely that even a single restaurant would materialize in the near future. It is also unlikely, given the number of dining options that are within the region, that a restaurant – or even two restaurants – would be able to keep people within the development on a regular basis. PF14-7 cont.

It is possible to imagine a scenario in which commercial development within Martis Valley West would draw enough customers from the surrounding area to support itself and thereby generate commercial development that would provide local trip capture for the development. Even if we leave aside the obvious conflict between counting on commercial occupancy to generate local trip capture and the fact that this increased use of the site would increase trips along 267 from other areas, this is an unlikely possibility. According to a recent survey of the area, there is significant commercial vacancy in Truckee, the nearest commercial center, indicating that there is not a lack of commercial establishments in the area. This is compounded by the fact that additional commercial space is planned for two upcoming developments as well – Joerger Ranch and the Truckee Railway Master Plan.

In conclusion, it is our estimation that successful commercial development within the Martis Valley West development is unlikely, that it is even more unlikely to occur in the near future given the expected time to build out the project, and that it is extremely unlikely that even the commercial that may be imagined in the distant future would be of a type that would generate any appreciable local trip capture for the development. Therefore, local trip capture should not be considered to provide any reduction in traffic impacts on 267.

Methodology for calculating stormwater impacts, GHG emissions and carbon sequestration

Stormwater

The stormwater impact numbers were generated using the National Stormwater Calculator from the US EPA: https://www.epa.gov/water-research/national-stormwater-calculator. The technical fact sheet with all the assumptions can be found at http://nepis.epa.gov/Adobe/PDF/P100HD4I.pdf. PF14-7 cont.

GHG emissions

Embodied GHG emissions associated with building and road construction was calculated using the base data for housing typology and road construction included in the SEPA Greenhouse Gas Emissions Worksheet available here: http://www.seattle.gov/dpd/permits/forms/

Carbon Sequestration

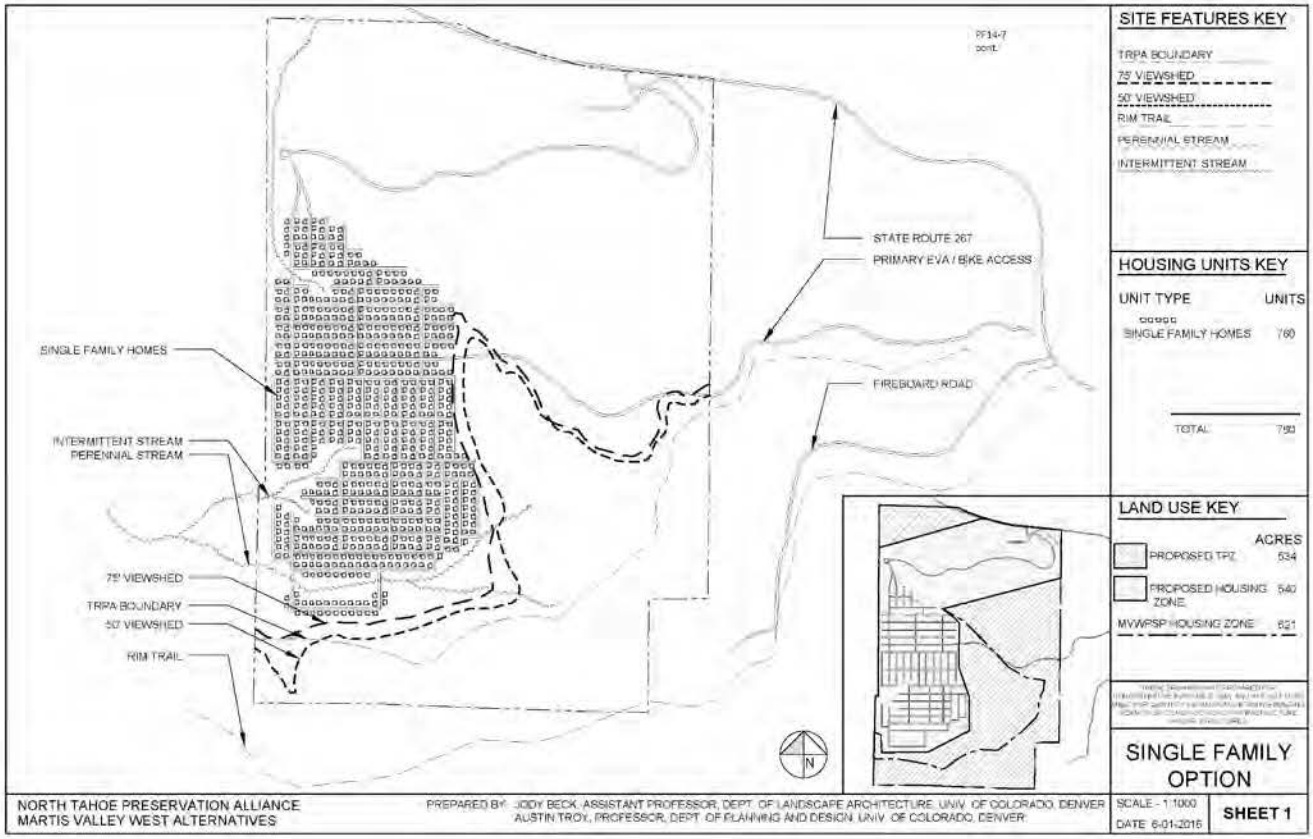
Base program used: Forest Carbon Xplorer
-http://forestcarbonx.umn.edu/#

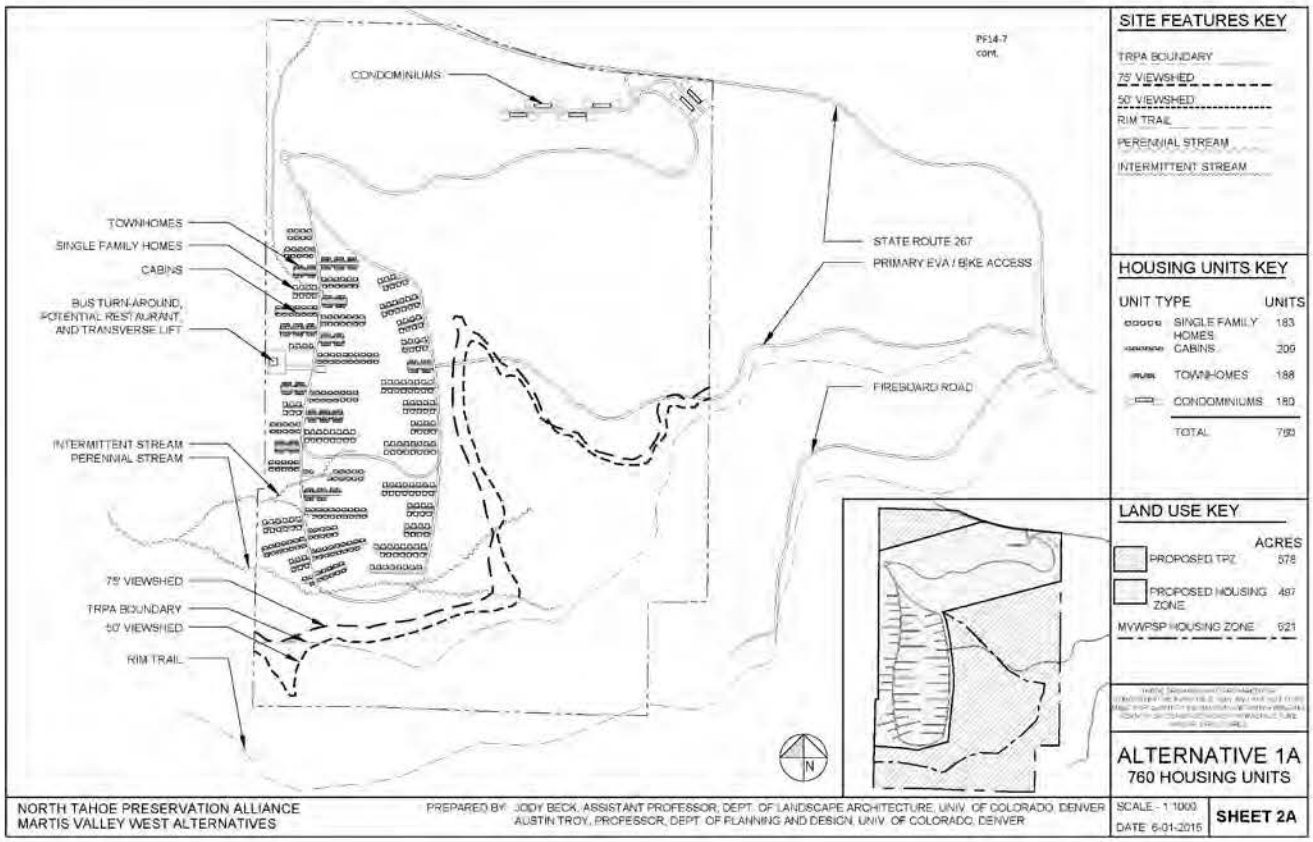
GIS data source
-http://www.fs.usda.gov/rds/archive/Product/RDS-2013-0004
-Service Layer Credits: Copyright:© 2013 National Geographic Society, i-cubed
-GIS projection: NAD 1983 HARN StatePlane California II FIPS 0402 (US Feet)
GIS Process

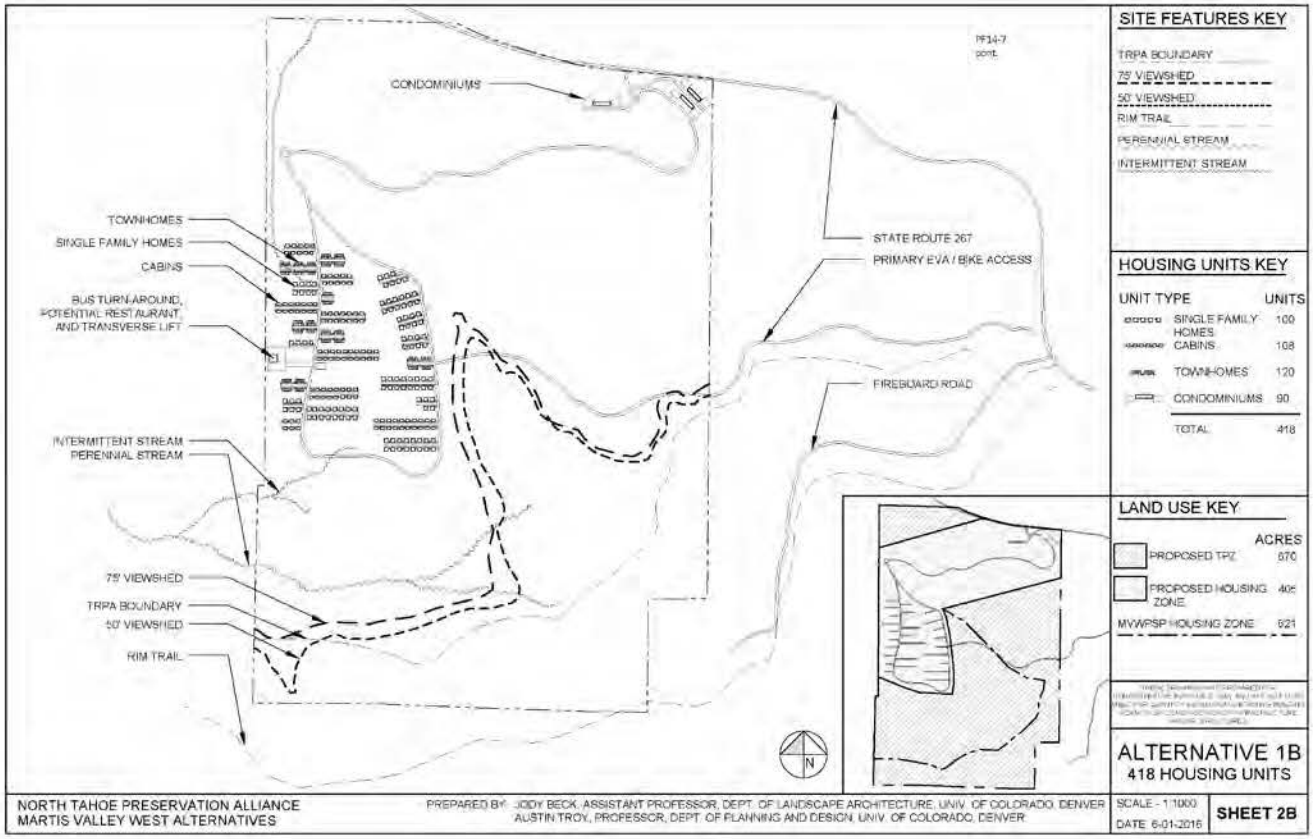
A GIS basemap layer (Service Layer Credits: Copyright:© 2013 National Geographic Society, i-cubed) was also used. The autocad drawings were then converted to images and georeferenced into GIS, using the basemap for reference.

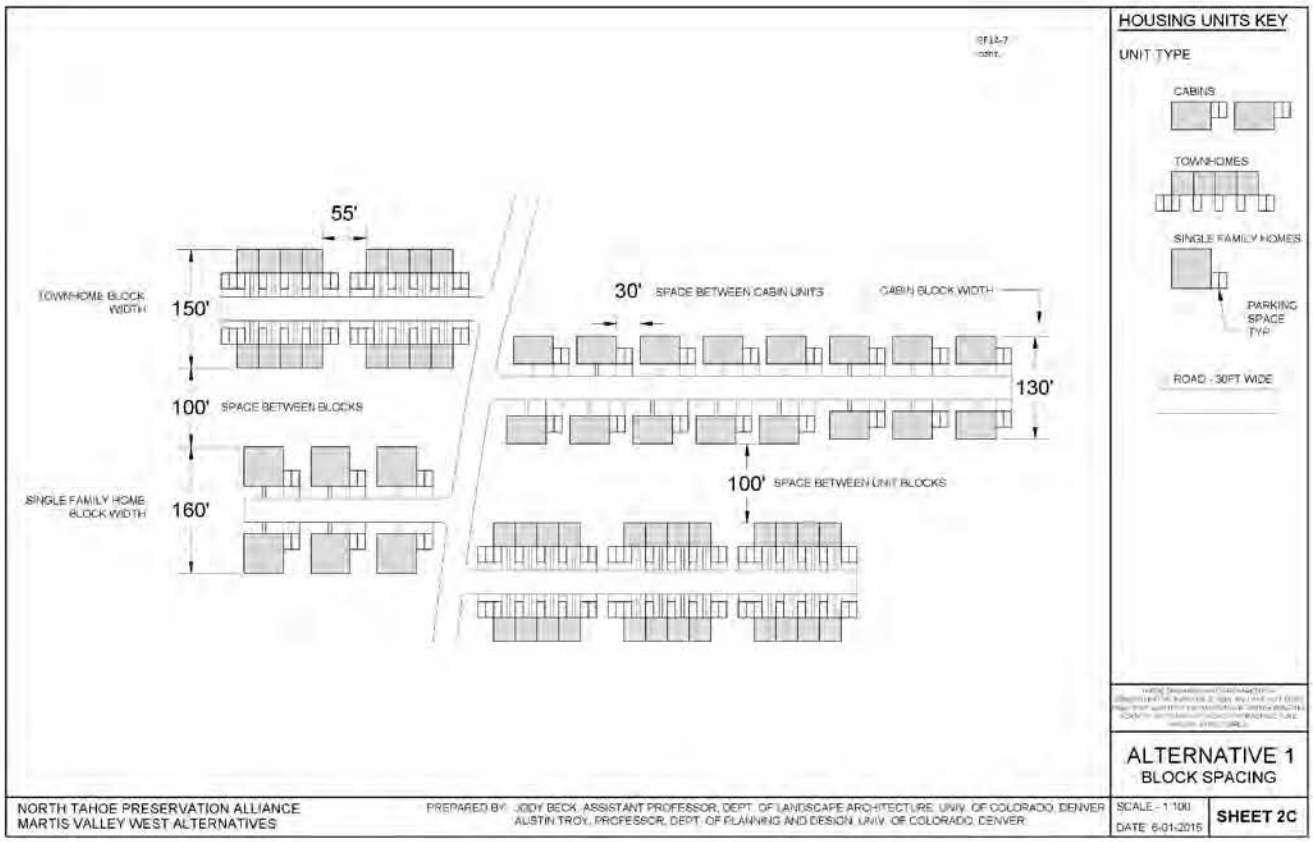
The extents of housing development as per each alternative was traced in GIS. Using the 'clip raster' tool (Data Managment Tools - Raster - Raster Processing - Clip), the forset carbon rasters were clipped to the drawn extents.

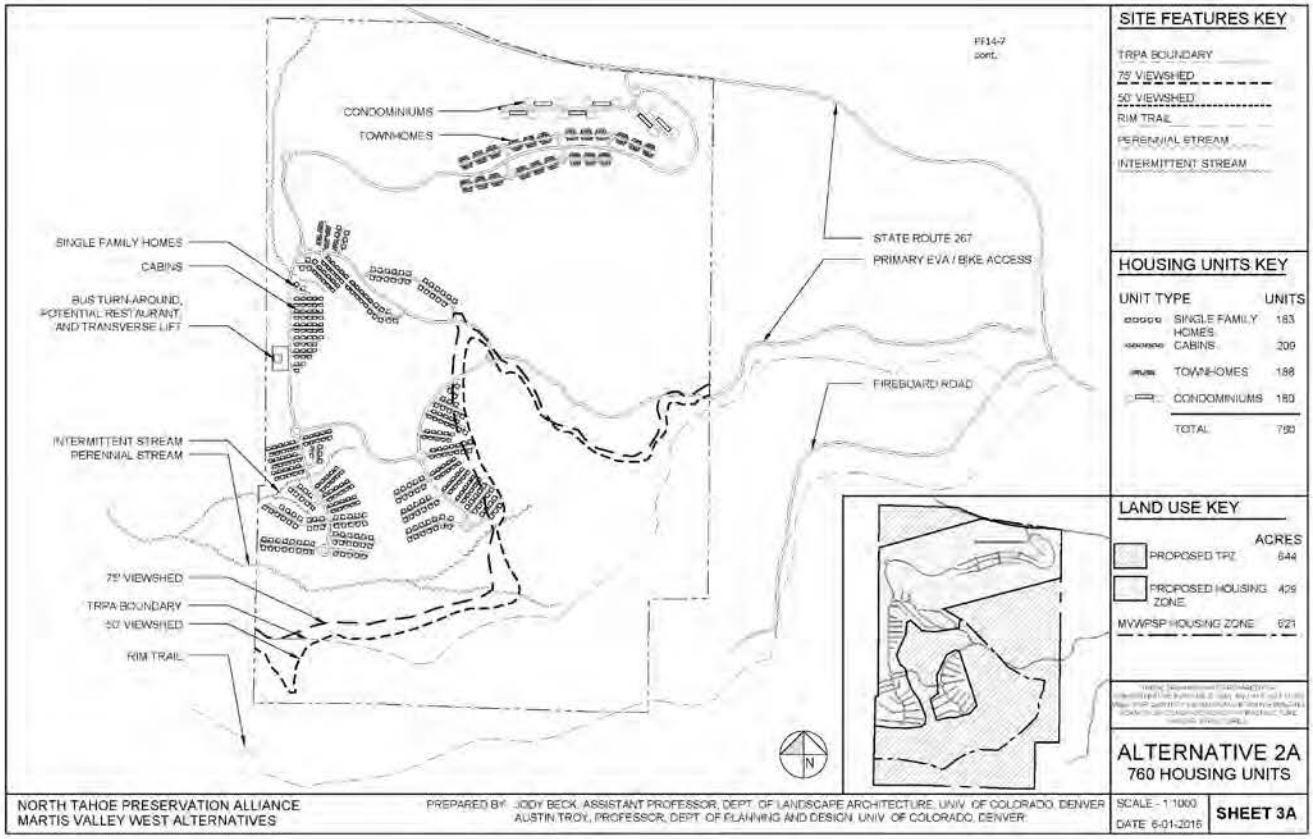
The "Use Input Features for Clipping Geometry" toggle button was clicked on when using the tool. The "Raster to Point" tool (Conversion Tools - From Raster - Raster to Point) was then used to generate point data, one point (in megagrams) per hectare estimates for a pixel (as per source metadata). From points, statistical numbers could be generated from the attribute table. These statistical numbers yielded mean data and sum data, corresponding with the Forest CarbonX generated information of Density/hectare and Tonnes respectively (as per a brief phone conversation with the software developers on 05.27.2016). This process was repeated for each of the eight forest carbon raster layers and for each of the five alternatives.

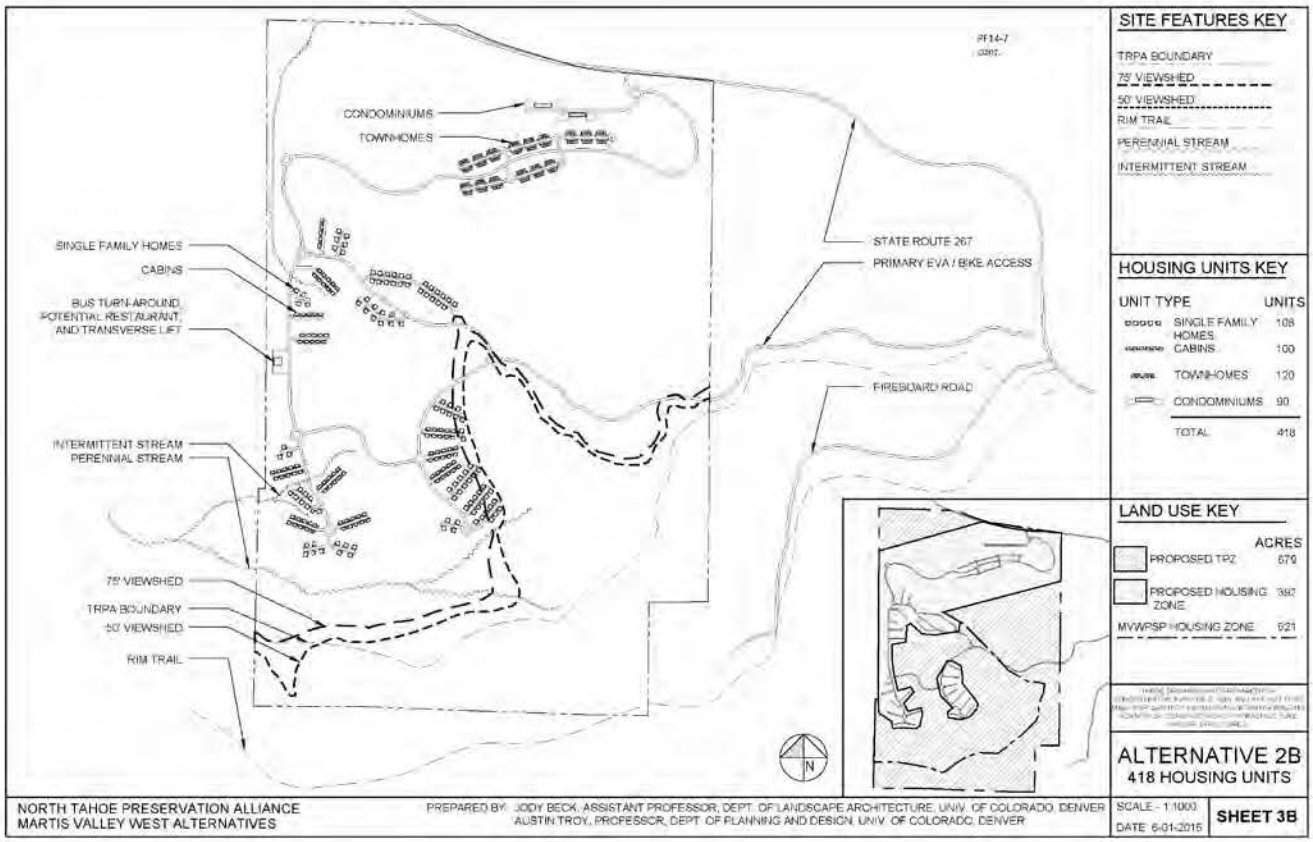

PF14-7
cont.
STATE ROUTE 267
PRIMARY EVA / BIKE ACCESS
FIREBOARD ROAD
SINGLE FAMILY HOMES
INTERMITTENT STREAM
PERENNIAL STREAM
75' VIEWSHED
TRPA BOUNDARY
50' VIEWSHED
RIM TRAIL
N
SITE FEATURES KEY
TRPA BOUNDARY
75' VIEWSHED
50' VIEWSHED
RIM TRAIL
PERENNIAL STREAM
INTERMITTENT STREAM
HOUSING UNITS KEY
UNIT TYPE UNITS
SINGLE FAMILY HOMES 760
TOTAL 760
LAND USE KEY
ACRES
PROPOSED TPZ 534
PROPOSED HOUSING ZONE 540
MVWPSP HOUSING ZONE 621
SINGLE FAMILY OPTION
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:1000
DATE 6-01-2015
SHEET 1

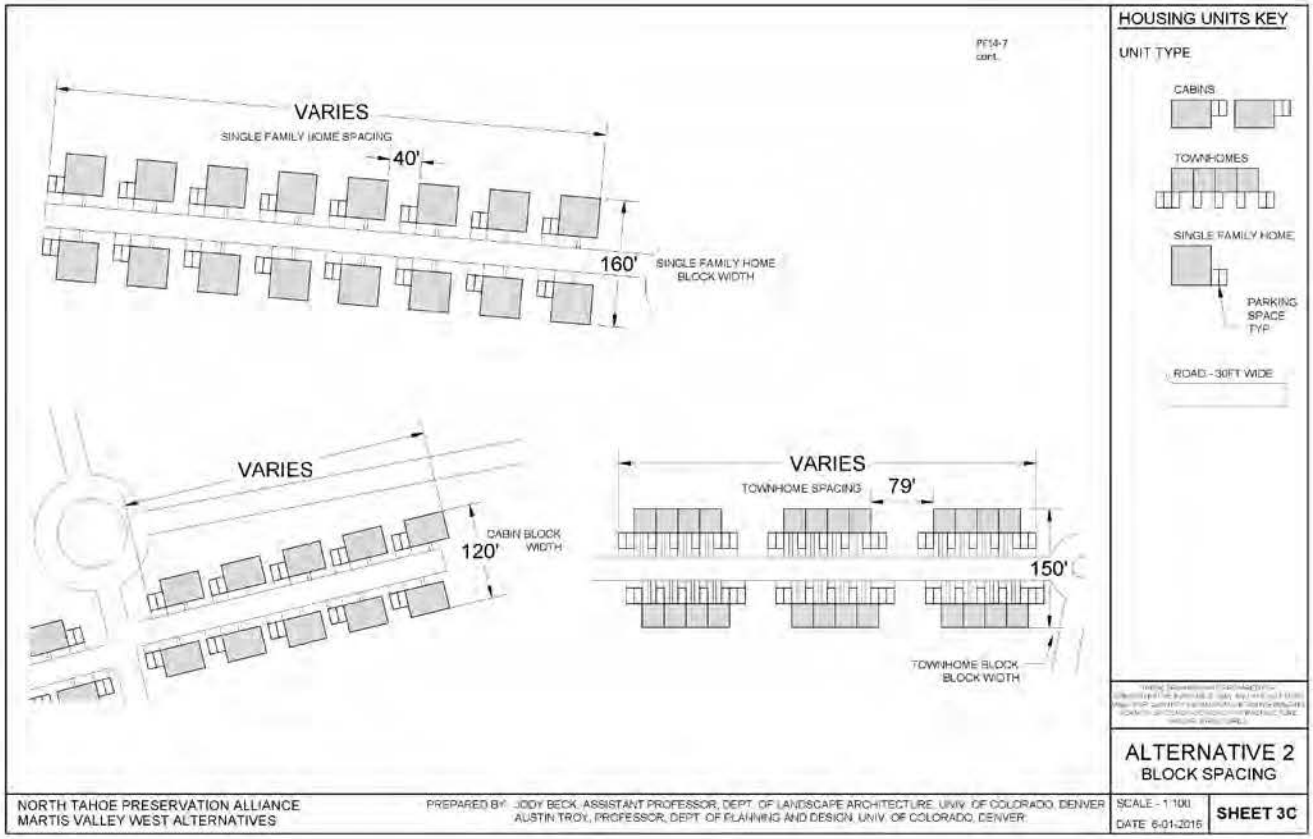

PF14-7
cont.
CONDOMINIUMS
TOWNHOMES
SINGLE FAMILY HOMES
CABINS
BUS TURN-AROUND,
POTENTIAL RESTAURANT,
AND TRANSVERSE LIFT
STATE ROUTE 267
PRIMARY EVA / BIKE ACCESS
FIREBOARD ROAD
INTERMITTENT STREAM
PERENNIAL STREAM
75' VIEWSHED
TRPA BOUNDARY
50' VIEWSHED
RIM TRAIL
N
SITE FEATURES KEY
TRPA BOUNDARY
75' VIEWSHED
50' VIEWSHED
RIM TRAIL
PERENNIAL STREAM
INTERMITTENT STREAM
HOUSING UNITS KEY
UNIT TYPE UNITS
SINGLE FAMILY HOMES 183
CABINS 209
TOWNHOMES 188
CONDOMINIUMS 180
TOTAL 760
LAND USE KEY
ACRES
PROPOSED TPZ 578
PROPOSED HOUSING ZONE 497
MVWPSP HOUSING ZONE 621
ALTERNATIVE 1A
760 HOUSING UNITS
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:1000
DATE 6-01-2015
SHEET 2A

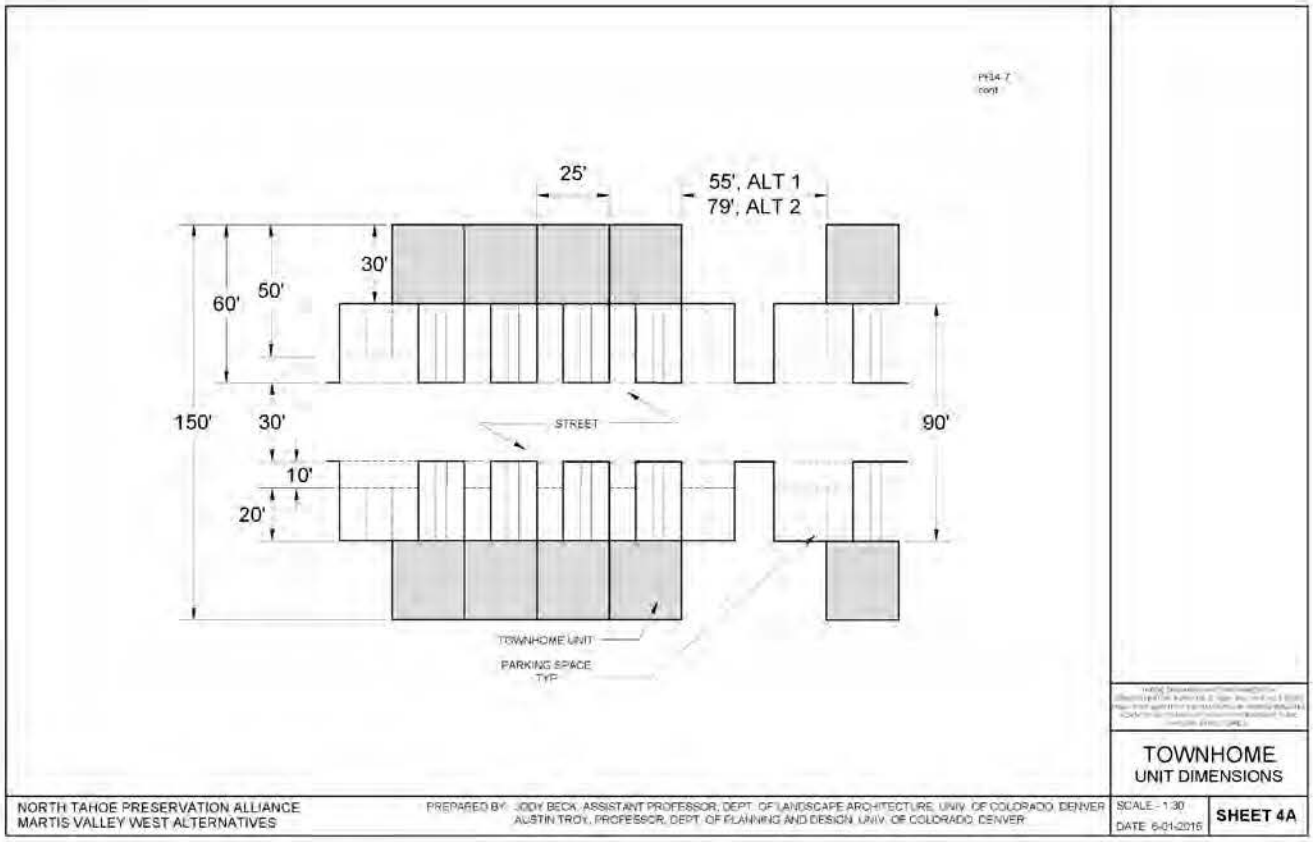

SITE FEATURES KEY
TRPA BOUNDARY
75' VIEWSHED
50' VIEWSHED
RIM TRAIL
PERENNIAL STREAM
INTERMITTENT STREAM
HOUSING UNITS KEY
UNIT TYPE
UNITS
SINGLE FAMILY HOMES 100
CABINS 108
TOWNHOMES 120
CONDOMINIUMS 90
TOTAL 418
LAND USE KEY
ACRES
PROPOSED TPZ 570
PROPOSED HOUSING ZONE 405
MVWPSP HOUSING ZONE 521
ALTERNATIVE 1B
418 HOUSING UNITS
CONDOMINIUMS
TOWNHOMES
SINGLE FAMILY HOMES
CABINS
BUS TURNAROUND, POTENTIAL REST AURANT, AND TRANSVERSE LIFT
INTERMITTENT STREAM
PERENNIAL STREAM
75' VIEWSHED
TRPA BOUNDARY
50' VIEWSHED
RIM TRAIL
STATE ROUTE 267
PRIMARY EVA / BIKE ACCESS
FIREBOARD ROAD
N
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:1000
DATE 6-01-2015
SHEET 2B

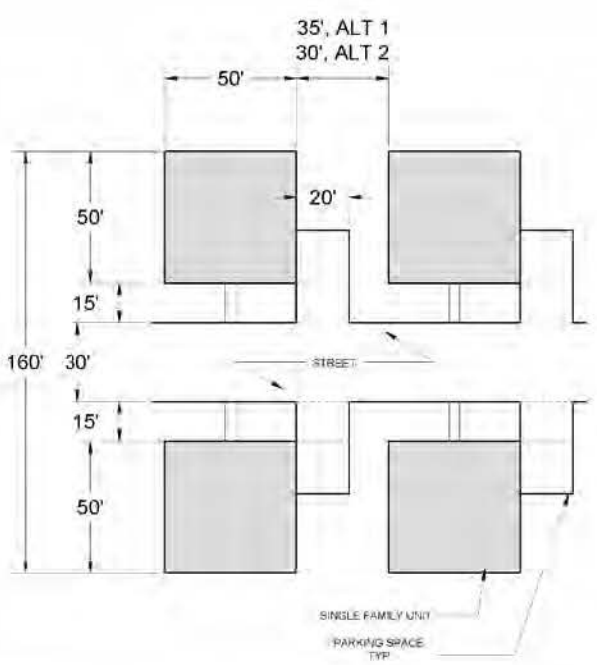

HOUSING UNITS KEY
UNIT TYPE
CABINS
TOWNHOMES
SINGLE FAMILY HOMES
PARKING SPACE TYP
ROAD - 30FT WIDE
55'
TOWNHOME BLOCK WIDTH
150'
100' SPACE BETWEEN BLOCKS
SINGLE FAMILY HOME BLOCK WIDTH
160'
30' SPACE BETWEEN CABIN UNITS
CABIN BLOCK WIDTH
130'
100' SPACE BETWEEN UNIT BLOCKS
ALTERNATIVE 1
BLOCK SPACING
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:100
DATE 6-01-2015
SHEET 2C


SITE FEATURES KEY
TRPA BOUNDARY
75' VIEWSHED
50' VIEWSHED
RIM TRAIL
PERENNIAL STREAM
INTERMITTENT STREAM
HOUSING UNITS KEY
UNIT TYPE UNITS
SINGLE FAMILY HOMES 183
CABINS 209
TOWNHOMES 188
CONDOMINIUMS 180
TOTAL 760
LAND USE KEY
ACRES
PROPOSED TPZ 644
PROPOSED HOUSING ZONE 429
MVWPSP HOUSING ZONE 621
ALTERNATIVE 2A
760 HOUSING UNITS
CONDOMINIUMS
TOWNHOMES
SINGLE FAMILY HOMES
CABINS
BUS TURN-AROUND, POTENTIAL RESTAURANT, AND TRANSVERSE LIFT
INTERMITTENT STREAM
PERENNIAL STREAM
75' VIEWSHED
TRPA BOUNDARY
50' VIEWSHED
RIM TRAIL
STATE ROUTE 267
PRIMARY EVA / BIKE ACCESS
FIREBOARD ROAD
N
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:1000
DATE 6-01-2015
SHEET 3A


SITE FEATURES KEY
TRPA BOUNDARY
75' VIEWSHED
50' VIEWSHED
RIM TRAIL
PERENNIAL STREAM
INTERMITTENT STREAM
HOUSING UNITS KEY
UNIT TYPE UNITS
SINGLE FAMILY HOMES 108
CABINS 100
TOWNHOMES 120
CONDOMINIUMS 90
TOTAL 418
LAND USE KEY
ACRES
PROPOSED TPZ 679
PROPOSED HOUSING ZONE 382
MVWPSP HOUSING ZONE 621
ALTERNATIVE 2B
418 HOUSING UNITS
CONDOMINIUMS
TOWNHOMES
SINGLE FAMILY HOMES
CABINS
BUS TURN-AROUND, POTENTIAL RESTAURANT, AND TRANSVERSE LIFT
INTERMITTENT STREAM
PERENNIAL STREAM
75' VIEWSHED
TRPA BOUNDARY
50' VIEWSHED
RIM TRAIL
STATE ROUTE 267
PRIMARY EVA / BIKE ACCESS
FIREBOARD ROAD
N
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:1000
DATE 6-01-2015
SHEET 3B


PE14-7
cont.
VARIES
SINGLE FAMILY HOME SPACING
40'
160'
SINGLE FAMILY HOME
BLOCK WIDTH
VARIES
CABIN BLOCK
WIDTH
120'
VARIES
TOWNHOME SPACING
79'
150'
TOWNHOME BLOCK
BLOCK WIDTH
HOUSING UNITS KEY
UNIT TYPE
CABINS
TOWNHOMES
SINGLE FAMILY HOME
PARKING
SPACE
TYP
ROAD - 30FT WIDE
ALTERNATIVE 2
BLOCK SPACING
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:100
DATE 6-01-2015
SHEET 3C


PE14-7
cont
25'
55', ALT 1
79', ALT 2
30'
60'
50'
150'
30'
STREET
90'
10'
20'
TOWNHOME UNIT
PARKING SPACE
TYP
TOWNHOME
UNIT DIMENSIONS
NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES
PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER
SCALE - 1:30
DATE 6-01-2015
SHEET 4A



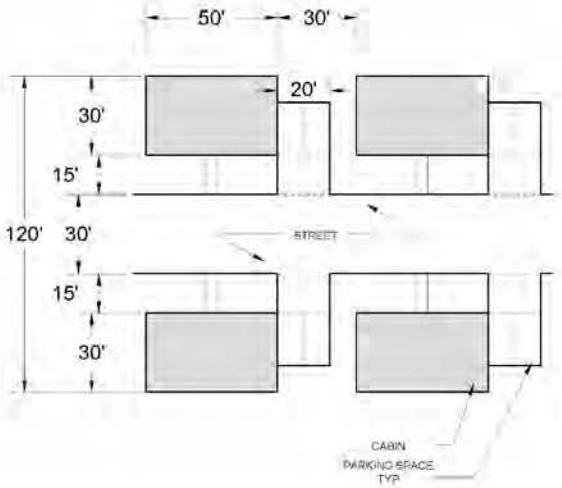
SINGLE FAMILY HOME
UNIT DIMENSIONS

NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES

PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER

SCALE - 1:30
DATE 6-01-2016

SHEET 4B



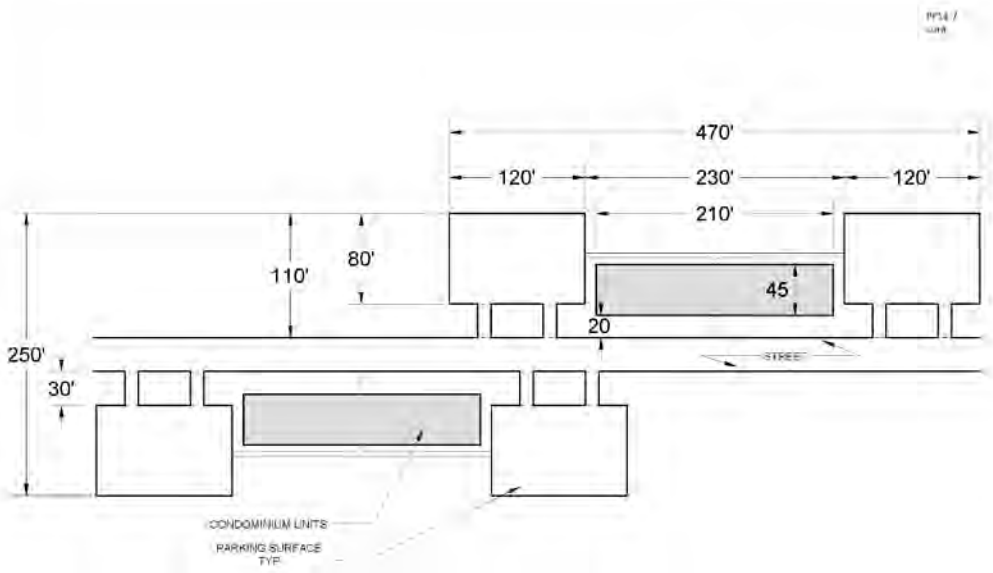
CABIN
UNIT DIMENSIONS

NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES

PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER

SCALE - 1:30
DATE 6-01-2016

SHEET 4C



CONDOMINIUMS
UNIT DIMENSIONS

NORTH TAHOE PRESERVATION ALLIANCE
MARTIS VALLEY WEST ALTERNATIVES

PREPARED BY: JODY BECK, ASSISTANT PROFESSOR, DEPT. OF LANDSCAPE ARCHITECTURE, UNIV. OF COLORADO, DENVER
AUSTIN TROY, PROFESSOR, DEPT. OF PLANNING AND DESIGN, UNIV. OF COLORADO, DENVER

SCALE - 1:70
DATE 6-01-2016

SHEET 4D

PF14

Eugene S. Wilson, California Clean Energy Committee
Ann Nichols, North Tahoe Preservation Alliance
June 3, 2016

PF14-1 The comment provides information about the California Clean Energy Committee (CCEC) and the North Tahoe Preservation Alliance (NTPA) and states that defects in the EIR noted in previous comments (form NTPA dated December 21, 2015) have not been corrected. Responses to previous comments from NTPA are included in the Final EIR under Letter IO31. The comment notes petitions in opposition to the project as it is currently proposed. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Finally, the comment states that the EIR should be recirculated. See response to comment PF13-2 and Master Response 1 of the Final EIR.

PF14-2 The comment suggests that Mitigation Measure 12-2 is not sufficient to address GHG impacts, and that such measures should not be deferred to a later date, and should identify feasible mitigation for GHG impacts of the project. Due to uncertainty that exists with future GHG reduction targets and project-level thresholds, and in response to *Center for Biological Diversity v. California Department of Fish and Wildlife*, Mitigation Measure 12-2 requires that any subdivision maps submitted under the project (i.e. before and after 2020) be required to reduce, to the extent necessary and feasible, GHG emissions such that the project operates within the targets or adopted plan established at the time the map is submitted for approval. This means that every subdivision map submitted for approval will require further scrutiny and analysis and will need to demonstrate whether that portion of the project will exceed applicable operational thresholds. Mitigation Measure 12-2 outlines a number of potential actions that the project could take to meet applicable thresholds and requires that each action chosen be calculated for GHG reduction potential. This list of potential actions is not intended to be limited or all-inclusive and may be supplemented with other measures such as actions that may not be technologically feasible at present but may be feasible at the time of a future subdivision map submittal, as well as measures recommended in this comment. As long as the project demonstrates that future subdivision maps would comply with applicable GHG thresholds, other actions may be proposed at the time such maps are proposed. Finally, the Final EIR includes the provision for carbon offsets in the event that the GHG thresholds cannot otherwise be met through onsite mitigation. This offset requirement assures that, even if sufficient reductions are not feasible within the project (and no information suggests this at this time), that the applicant will still be required to reduce GHG impacts to levels below established targets.

The comment also suggests that Mitigation Measure 12-2 would only apply if a new GHG target or program is adopted by legislative or administrative action. GHG impacts of a project need to be addressed under CEQA and Mitigation Measure 12-2 establishes the parameters for analysis of each subdivision map. The absence of an adopted target at the State level would not preclude this project-level analysis. Moreover, the California Air Resources Board (ARB) is working on a Scoping Plan to address the 2030 GHG reduction target put forth under Executive Order B-30-15. The target established under ARB's plan would be one example of the information referred to in Mitigation Measure 12-2.

The comment then outlines a number of mitigation measures recommended by the CCEC, a number of which are similar to those recommended in Mitigation Measure 12-2 (e.g., requiring that all buildings exceed Title 24 energy-efficiency requirements by 15 percent, enacting design features that reduce building energy requirements) and/or in the MVWPSP. As indicated above, subsequent projects may use a variety of measures to meet applicable standards, and could opt to use, for example, solar water heaters as one measure. Other

measures, such as funding a "green bag" program for yard trimmings, cannot feasibly be implemented on a project level and are more appropriate for the County to consider on a larger scale.

PF14-3 The comment suggests that the project is not of sufficient size or at a suitable location to support the level of commercial development projected. See response to comment PF14-7 regarding the viability of proposed commercial development on the project site. The comment states that the EIR should evaluate the additional vehicle miles traveled that will result from the project being predominately second homes. See Master 6 in the Final EIR regarding project-related VMT. The comment recommends preparation of a transportation demand management program and suggests that it be designed in coordination with Tahoe Area Regional Transit District and the Truckee North Tahoe Transportation Management Association. See responses to comments O18-30, IO41-49, and IO47-2 regarding the project's membership into the TMA.

PF14-4 As explained in Final EIR response to comment IO31-36, Impact 16-4 in the Draft EIR addresses the project's energy usage to determine if the project would result in inefficient or wasteful consumption of energy. In accordance with MVWPSP Policies ER-AQ4, ER-AQ5, ER-AQ6, ER-AQ7, ER-AQ9, ER-AQ13, ER-AQ15, and ER-AQ16, the proposed project would incorporate energy efficiency requirements and would include additional energy conservation and efficiency features. This impact was determined to be less than significant, and no additional measures are required. The MVWPSP policies would reduce per capita energy use, thereby providing a relatively energy efficient residential and commercial project, and would encourage use of renewable energy sources and alternatives to travel by personal vehicle. With the implementation of various energy conservation code requirements and energy conservation policies included with the MVWPSP, the proposed project would not result in an inefficient or wasteful consumption of energy. In addition, response to comment IO41-60 in the Final EIR discusses why the Draft EIR could not meaningfully include a quantitative analysis of GHG efficiency, including energy usage.

PF14-5 Draft EIR Cumulative Impact 5-8 provides an adequate analysis of the project's contribution to the cumulative loss forested lands and the cumulative conversion TPZ. Estimating climate-related forest loss due to drought, wildfire, or bark beetle, as suggested, would be speculative. The EIR used the Countywide General Plan EIR and reasonable assumptions regarding anticipated ongoing forest conversion in the area to determine whether the project contribution to cumulative forest conversion would be significant.

See Final EIR Master Response 3 regarding the baseline environmental conditions used to determine environmental impact conclusions in the Draft EIR. As discussed in Master Response 3, the baseline conditions for the MVWPSP Draft EIR are the physical, environmental conditions as they existed at the time that the March 2014 NOP was published. The Draft EIR does not compare impacts to a hypothetical full buildout of existing plans. However, as a planning document that would supersede the MVCP for the plan area, the MVWPSP would result in a shift of allowed residential and commercial development from the East Parcel to the West Parcel. Therefore, a discussion of the existing land use designations, the development potential, and the estimated associated population under the MVCP on the East Parcel is necessary in disclosing the existing setting and the effects of the project (see Master Response 3 for additional details).

PF14-6 The comment addresses the alternatives analysis in the Draft EIR. See response to comment PF13-9 and Final EIR Master Response 10 regarding the alternatives analysis.

PF14-7 As an attachment to its comment letter, CCEC and NTPA offered several alternatives to the MVWPSP drafted by the University of Colorado Denver.

Proposed Alternatives

The University of Colorado Denver (UCD) proposes several alternative site layouts for the MVWPSP on behalf of NPTA and CCEC. According to the letter, the "alternatives presented herein carry out the land use goals more effectively while offering significant improvements to project performance in terms of aesthetic impacts on Lake Tahoe basin, the potential for trip reduction along SR 267 and reduced environmental impacts, including greenhouse gas emissions." (page 2). However, as discussed in detail below, the alternatives proposed would either not be feasible, would not meet project objectives and/or would not substantially reduce the impacts of the MVWPSP.

Four alternatives are presented. Alternatives 1A and 2A provide for up to 760 units, the same as the proposed MVWPSP, but each with a particular layout and unit mix. The remaining two alternatives, 1B and 2B provide for up to 418 units. These alternatives are assumed to have a higher percentage of townhomes, condominiums, and cabins than the MVWPSP (page 5). This would be achieved by having an equal number of each type of housing unit. While the comment is correct that this mix would have more townhomes, condominiums, and cabins than the probable mix of units for the MVWPSP (page 27), the MVWPSP allows for a range of each type of development, including a unit mix with 420 multifamily units (townhomes and condominiums), which would be more multifamily units than the 380 units provided by Alternatives 1A and 2A. And, as discussed below, the limitation on the number of single-family homes cited in the comment would not substantially lessen the significant effects of the MVWPSP.

The proposed alternatives also provide for less parking than required by the MVWPSP. The comment states that the two parking spots per unit plus up to two visitor spots per unit would result in an excessive amount of paving (page 6). The comment further states that parking is not expected to be placed underground given the costs and special implications, so the comment assumes that all parking will be surface parking. The comment therefore greatly over-estimates the amount of paving associated with the parking requirements. The two spaces per unit for single family homes would be located within garages, so no additional paving would be required. One or more guest spaces may also be located in garages. For townhomes and condominiums, it is likely that a large proportion of parking will be located in structures, as is the case with other Sierra developments, such as the Ritz, Northstar and the Village at Squaw Valley. Furthermore, the MVWPSP parking requirements are based on the County's parking standards.

According to the introduction, the four alternatives would improve the aesthetic, trip generation, and environmental performance of the project and reduce greenhouse gas emissions (GHG) and increase the carbon sequestration potential of the project site.

Several impact analyses and planning considerations are presented, comparing the proposed alternatives to the MVWPSP. As discussed in more detail, below, these analyses were based largely on federal models and nationwide or statewide data, rather than site-specific information, such as the numerous studies prepared for the MVWPSP and EIR. Nor did the UCD staff who prepared the proposed alternatives and analyses appear to have conducted a site visit and/or discussed any aspect of the site or MVWPSP with County or applicant staff or consultants.

It should be noted that proposed Alternatives 1B and 2B would not be financially feasible, for the same reasons as MVWPSP Draft EIR Alternative 3, Reduced Density Alternative, which was found to be financially infeasible (Goodwin Consulting Group, July 2016). Like proposed Alternatives 1B and 2B, Alternative 3 provides for up to 418 units.

As discussed in more detail below, the proposed Alternatives 1A and 2A would not substantially reduce the significant impacts of the proposed MVWPSP.

Aesthetics

For their aesthetics analysis, UCD prepared a line-of-sight analysis using the topography of the site to establish the viewshed boundaries and the allowable building heights. This viewshed analysis is focused solely on potential views from the Tahoe Basin. An exhibit was prepared showing the 75' and 50' viewshed lines. The proposed alternatives then restrict development to those areas within the viewshed lines in order to protect views from Lake Tahoe from development and keep construction one-half mile from the Tahoe Rim Trail (page 3).

The UCD viewshed analysis uses the same type of geographic information used in the MVWPSP Draft EIR. The UCD used GIS for their visibility study. It did not integrate tree information and also did not indicate from which of the viewpoints they detected visibility.

According to Appendix B of the UCD letter, 100-foot contours were used in their analysis, while the topographic information used for the MVWPSP Draft EIR was accurate to 10 feet. This information was used in the initial study for the MVWPSP Draft EIR to help map visibility from the basin, particularly from points near the north shore. The MVWPSP Draft EIR analysis further refines the visual analysis by taking additional refinements by layering additional context and project specific information on top of the topographic information. A forest model based on aerial photography of the area was layered onto the terrain model. Structures specific to the project concept plan were placed on it at the highest grade points.

The terrain model did show that, without accounting for vegetation, including 70-foot tall trees, a portion of the commercial structure would extend over the ridge and have a direct sightline to points on the south shore of the lake. However, the MVWPSP would not be developed under a bare earth scenario, and the area is covered with 70-foot tall trees. Although there may be a direct sightline from points near the south shore of the lake, MVWPSP development will not be discernable at almost 20 miles away through a thick cover of trees. The photography in Comment 13-7 is an excellent demonstration of this.

Please see Master Response 4 in the Final EIR for a detailed discussion of the Draft EIR visual analysis.

Trip Reduction

The comment states that organizing around clustered development would increase successful transit use and that it is unlikely if the MVWPSP is composed predominately of large-lot single family homes that it would successfully encourage the use of transit. The comment goes on to state that it "seems improbably that people would pack up their gear, drive their private cars a very short distance to the transit stop at the entry to development…and wait for the bus." Rather, they would stay in their car once it is packed for the day and drive to their destination. The comment proposes that a transit stop be provided within the development, replacing or augmenting the main transit stop, and that all residential units be clustered within one-quarter mile or less from the main road and potential additional supplemental transit stops.

While it is reasonable to assume that people are more likely to use transit when it is close and convenient, the comment does not provide any evidence that locating all homes within ¼ mile of a shuttle stop would substantially reduce automobile use compared to the proposed MVWPSP. The contention that people who have gear to carry would be less likely to use transit if they first had to load the gear into a vehicle is not supported. It could be that those who were taking more items than could easily be carried would choose to drive in any case. Conversely, those who could easily carry everything they needed for their outing might be more influenced by the availability of parking and convenience of transit at their destination.

The MVWPSP calls for implementation of a shuttle at the 340th residential unit (page 42 of the MVWPSP). Contrary to the statement on page 7 of the comment, the MVWPSP shuttle is required, not optional. It is true that the route has yet to be established, but it would be tailored to the needs of residents and guests, which would be the most effective way of ensuring that the shuttle is used.

The comment states that the proposed transit stop along SR 267 would be better than no transit stop. It should be noted that the MVWPSP proposes to have a transit stop within the plan area so that riders do not have to cross SR 267 to access the bus.

The MVWPSP includes a number of transportation management measures that are intended to reduce vehicle trips (page 42 of the MVWPSP). In addition to the shuttle, neighborhood commercial uses and recreational amenities would enable residents and guests to meet many of their needs onsite. Trails for cross-country skiing, hiking and biking will provide links between homes, commercial establishments and recreational amenities. In addition, the MVWPSP would support regional access to transit by providing a bus stop onsite, working with local transit providers to support transit services and providing financial support to local transit, including a one-time payment of $59,700 and annual payments of $68,000 (projected total of approximately $1.4 million before adjustment for inflation), which are above and beyond the transit fee required by Mitigation Measure 10-5a. As required by Mitigation Measure 10-5b, the MVWPSP would also maintain membership in the Truckee-North Tahoe Transportation Management Association.

Viability of Commercial Development

The comment states that walkable transit is particularly essential given the low probability that any commercial development would be successful within the MVWPSP because of the low total number of residences and because the number of permanent occupants would be low (page 7). This statement is based on typical retail outlet ratios for California as a whole (page 8), and estimates of seasonal occupancy made by the commenter. The comment then concludes that at 60% occupancy, the MVWPSP would support only one restaurant, and that at full occupancy, it would support three restaurants. Further the comment claims that there is no scenario that would support a grocery store of any size, a drug store, a drinking establishment, a gasoline station or a book store (see page 1 of Appendix D of the comment).

The conclusion that the MVWPSP would not support commercial establishments is based solely on statewide averages, which ignores the variations that underlie those averages. For example, Appendix D shows that on average within the entire state, there are 585 people per restaurants and other eating places. Presumably, this average is made of instances when there are fewer and more than 585 people per restaurant, but no ranges are reported. By using an average population per restaurant, the comment does not take into account differences by community, geography, restaurant type and other factors. Further, the number of people per restaurant does not indicate the minimum number needed for an enterprise to be successful. Again, the success of a commercial enterprise would be based on a number of factors, not solely the size of the population to be served.

In order to evaluate whether the MVWPSP would be able to support the type of commercial establishments anticipated in the Specific Plan, similar communities in the region were reviewed. This more specific, local approach demonstrates that the MVWPSP would have enough units to support commercial enterprises such as small restaurants and small grocery/sundry shops. Some examples of local developments composed primarily of vacation homes that also have one or more retail establishments are shown below.

Development	Number of Units	Commercial Establishments
Gray's Crossing	337 lots (1/3 currently built)	Restaurant staffed approximately 212 days/year.
Donner Lake	<1,000 du	2 restaurants, 1 grocery store
Glenshire	<1,000 du	1 restaurants, 1 grocery store
Lahontan	358 du	1 year-round restaurants
Old Greenwood	184 du	Restaurant, small grocery/sundry shop, golf course[1]; recreational amenities include spa, pool and fitness center
Northstar Village and Ritz Carlton	734 du	100,000 square feet of commercial, retail and F&B in village (open 11 months out of year), gas pumps.

[1] These developments also have recreational amenities (e.g., golf course, ski resort) that bring in a substantial visitor population during certain seasons. Old Greenwood a golf course, which would increase visitor numbers in the summer. Northstar is a ski resort, so the visitor population peaks in the winter season. However, the Village establishments are open 11 months out of the year; the off-peak seasons would be supported largely by homeowners and guests.

Source: Tahoe Mountain Realty, June 2016

As shown in the above table, there are local developments with fewer units than the MVWPSP proposes that have viable restaurants, stores and recreational amenities. These are the services that would be used most regularly by a vacation population (as opposed, for example, to the bookstores and drug stores cited in Appendix D of the comment).

Transverse Lift

The comment also suggests a transverse lift from the MVWPSP to Northstar in order to provide ski-in/ski-out access to some units within the MVWPSP (page 8). As shown on page A12 of the MVWPSP, a transverse lift between Northstar and MVWPSP is an allowed use. A lift to Northstar would need to cross property that is not controlled by the applicant, including tower and terminal sites at Northstar, and would have to be designed to avoid conflicts with Northstar facilities. Therefore, it is not considered feasible at this time. Further, a transverse lift would have only minimal effects on traffic. Approximately 8 percent of MVWPSP winter trips and 2 percent of summer trips are estimated to travel to Northstar (MVWPSP Draft EIR Exhibit 10-5). The number of travelers who would choose to use a lift rather than drive to Northstar is not known, but even if it were a majority, the resulting reduction in vehicle trips would not be enough to substantially reduce impacts on SR 267 and at local intersections. Further, a lift would have no effect on number of MVWPSP vehicles traveling to or from Truckee or the Basin.

Greenhouse Gas Reduction

Greenhouse gas emissions associated with the alternative project proposals were estimated by University of Colorado Denver staff using emissions calculators created for compliance with the Washington State Environmental Policy Act (SEPA). Data inputs used to calculate emissions are not provided in the comment letter, therefore, it is unclear how project-specific the information used to calculate emissions are. Furthermore, the spreadsheet's purpose is to facilitate compliance with SEPA, not CEQA, and it is not clear how modeling parameters and assumptions in the spreadsheet are tailored to requirements of SEPA, which may not be applicable to California regulations. The outputs of this calculator also focus on "embodied" greenhouse gas emissions per housing typology and seem to only address construction emissions. Project emissions in the Draft EIR were calculated using CalEEMod, a California specific modeling tool that PCAPCD recommends for GHG analyses and that contains region-specific inputs and emission factors relevant to the proposed project. Because reported numbers are not presented in a way to allow for comparison with the Draft EIR analysis (i.e. an "embodied" GHG emissions number is not the same as emissions from construction or

operation of the proposed project), it is not clear how much the alternatives would actually reduce GHG emissions.

Stormwater Reduction

The UCD letter also states that the layout and residential unit types of the proposed alternatives would require less soil disturbance and generate less stormwater (page 4).

As discussed throughout the Draft EIR, impacts associated with ground disturbance would be less than significant or could be reduced to less-than-significant levels through mitigation, including impacts on biological (Impacts 7-1 through 7-10) and cultural resources (Impacts 8-1 through 8-6), water quality (15-1, 15-2, 15-5 and 15-7), and air quality (Impacts 11-1, 11-4, 11-6, 11-7, and 11-9). Therefore, CEQA does not require that these impacts be addressed through alternatives. Furthermore, the proposed MVWPSP is designed to ensure that there is no net increase in runoff and no project runoff would flow to the Tahoe Basin, because the project drainage system would be directed toward the Martis Valley.

With respect to increased access to recreation, the MVWPSP already provides for extensive open space and recreation, including 14 miles of trails with connections to neighboring trails, and 390 acres of open space (over 30% of the MVWPSP plan area, or over one-half acre per unit) and the conservation of over 6,300 acres on the East Parcel. Additional recreational amenities would be provided within the developed areas (page 67 of the MVWPSP).

For the above reasons, the additional open space acreage that could be provided by clustering development would not substantially reduce impacts or materially improve the quality of MVWPSP development.

Carbon Sequestration

The comment calculates sequestration amounts for tree removal, based on tree type and vegetation. The proposed alternatives, due to smaller project footprints, show smaller losses of carbon sequestration. The Draft EIR took into account the loss of carbon sequestration from vegetation removal in its operational emissions calculations. The area of ground disturbance and associated tree removal, upon which emissions were calculated, was estimated using conceptual land use maps, disturbance limits established in the MVWPSP Development Standards and Design Guidelines, engineering assumptions for roadway widths and disturbance areas, and the vegetation mapping conducted for the project. The comment does not offer specific input and recommendations for the project's analysis and is acknowledged.

Appendix B: Methodology for Site Parameters

Appendix B of the comment provides information on the data and information used as the basis for the comment's analysis.

As stated previously, it does not appear that the methodology included a site visit or use of the site-specific data available from the MVWPSP, Draft EIR and/or supporting documents.

Streams

To identify stream corridors, a USGS National Elevation Dataset and ArcGIS software were used. Based on this methodology, two intermittent streams were identified in the eastern portion of the plan area. Typically, the USGS information is based on 40-foot contours. In contrast, the data for the MVWPSP analyses are based on aerial photogrammetry and topography with 1-foot contour interval for the eastern portion of the plan area and with 5-foot contour interval for the western portion of the plan area. Further, the wetland delineation prepared for the MVWPSP (Ascent Environmental, April 2015) shows that all wetlands, including streams, are located in the western portion of the plan area, near Martis Creek and SR 267.

The streams discussion also references Placer County Code requirements for setbacks from watercourses. The MVWPSP is consistent with these requirements. Policy ER-W1 requires the following setbacks:

- 100 feet from centerline of perennial streams;
- 50 feet from centerline of intermittent streams;
- 50 feet from the edge of preserved riparian areas, wetlands and special-status species habitat preservation areas, and
- Within the 100-year flood plain of Martis Creek.

Trails
Trails were digitized based on National Agricultural Inventory Program aerial photographs. As noted in the methodology discussion, the trails that exist might not be picked up through the method used. However, trail maps are provided in the Specific Plan and Draft EIR, based on site-specific information (see Figure 6-3 of the Specific Plan). As stated on page 66 of the MVWPSP, approximately 14 miles of trails would be provided within the MVWPSP.

Viewshed
Please see prior discussion.

Slopes
A slope analysis was conducted using USGS National Elevation Dataset and ArcGIS software were used. As discussed above, the slope mapping (see Figure 7-3 of the MVWPSP) is based on 1-foot and 5-foot interval contours rather than the larger contours in the USGS dataset. Further, the MVWPSP includes restrictions on development on steep slopes (see Figure 3-3 of the MVWPSP).

To the extent that the proposed alternatives or the comment's analysis of project impacts is based on the above information, it would not be as accurate as the site-specific data used in the MVWPSP, Draft EIR and supporting reports.

Appendix E: Methodology for Calculating Stormwater Impacts, GHG Emissions and Carbon Sequestration

Stormwater
The comment's stormwater impact numbers were generated using the National Stormwater Calculator from US EPA. The National Stormwater Calculator estimates the annual amount of rainwater and frequency of runoff from sites within the United States, based on local soil conditions, land cover and historic rainfall records. According to the User's Guide, the primary focus of the calculator is to inform site developers and property owners of how well they can meet a desired stormwater retention target, and is most appropriate for performing screening level analysis of small sites with a footprint of a few dozen acres and uniform soil conditions.[1] The discussion of methods does not indicate what assumptions were used. For example, what if any drainage infrastructure and/or Low Impact Development (LID) measures were included is not specified. Therefore, it is not clear whether the conclusions shown in Table 5 on page 11 of the comment letter are accurate. According to Table 5, the MVWPSP would retain a maximum 4.81 inches of rainfall. Alternatives 1A and 1B would retain a maximum of 5.14 and 5.09, respectively. The existing condition is not reported, so it is not clear how much of an increase or decrease in runoff is being reported.

[1] United States Environmental Protection Agency, *National Stormwater Calculator User's Guide*, September 2014, page 8.

In contrast, the Drainage Report prepared for the MVWPSP, is based on the Placer County Stormwater Management Manual, which is more reflective of regional conditions than the National Stormwater Calculator. Furthermore, MVWPSP policies require that post-development peak flows do not exceed pre-development peak flows, and that Best Management Practices and Low Impact Development measures be implemented. Therefore, the Draft EIR concludes that impacts related to drainage, including stormwater runoff and water quality, would be less than significant with mitigation (see Impacts 15-1, 15-2 and 15-5 in the Draft EIR).

GHG Emissions

Greenhouse gas emissions associated with the alternative project proposals were estimated by University of Colorado Denver staff using emissions calculators created for compliance with the Washington State Environmental Policy Act (SEPA). The spreadsheet's purpose is to facilitate compliance with SEPA, not CEQA, and it is not clear how modeling parameters and assumptions in the spreadsheet are tailored to requirements of SEPA, which may not be applicable to California regulations. Project emissions in the Draft EIR were calculated using CalEEMod, a California specific modeling tool that PCAPCD recommends for GHG analyses and that contains region-specific inputs and emission factors relevant to the proposed project.

Carbon Sequestration

The comment calculates sequestration amounts for tree removal, based on tree type and vegetation. The proposed alternatives, due to smaller project footprints, show smaller losses of carbon sequestration. The approach is acknowledged. The area of ground disturbance and associated tree removal, upon which emissions were calculated in the Draft EIR, was estimated using conceptual land use maps, disturbance limits established in the MVWPSP Development Standards and Design Guidelines, engineering assumptions for roadway widths and disturbance areas, and the vegetation mapping conducted for the project.

The sequestration analysis is based on current best practices in the field. While there may be other methods because this is a relatively new quantification field, we used the tool recommended by the air district to estimate loss in sequestration. Emissions associated with loss in carbon sequestration from vegetation removal accounts for 543 MT CO_2e /yr of a total of 35,965 MT CO_2e/yr, accounting for 1.5 percent of emissions. As such, it is not a substantial source of emissions. Vehicle trips, natural gas, and electricity consumption are the biggest contributors to emissions.

N·C·S·D

Northstar Fire Department
Northstar Community Services District
910 Northstar Drive, Northstar, CA 96161
P: 530.562.1212•F:530.562.0702•www.northstarcsd.org

Board of Directors
JEANN GREEN
NANCY P. IVES
FRANK SEELIG, PRESIDENT
DARRELL SMITH
CATHY STEWART

Fire Chief
MARK SHADOWENS

PF15

June 3, 2016
Stacy Wydra
Placer County Development Resource Agency
3091 County Center Drive
Suite 190 Auburn Ca 95603

Dear Mrs. Wydra

I am writing to you based on one item of concern that I noted in the Final EIR in the Martis Valley Specific Plan. In a comment letter from Northstar Fire Department dated December 18 2015, I commented that all emergency access and egress roads that are required by local and state code shall be all weather paved surfaces. In section 2.2.2 Revisions to chapter 3 Project Description the last paragraph on page 2-8 the project applicant continues to reference a seasonal EVA that will utilize an existing dirt road. Based on the remote location of this proposed development it is the position of Northstar Fire Department that all roads be paved regardless of them being seasonal or not. Additionally exhibit 3-9 shows a road configuration that would not meet the requirements of Placer County for dead end roads. I do understand that the exhibit is not the final design standard but in order for this development to meet the current standards several of the roads within the exhibit would need to connect with the Fibreboard Freeway which I think directly effects the EIR. PF15-1

I have made the project applicant aware of this issue and I am happy to speak directly with you at any time regarding this matter.

Sincerely,

Mark Shadowens
Fire Chief
Northstar Fire Department

PF15

Mark Shadowens, Fire Chief
Northstar Fire Department
June 3, 2016

PF15-1 The comment expresses that, per a previous letter from the Northstar Fire Department (NFD) dated December 18, 2015, all emergency access and egress roads that are required by local and state code shall be all weather paved surfaces. The comment also states that the road configuration shown on Draft EIR Exhibit 3-9 would not meet Placer County requirements for dead end roads.

Please see PF32, which is a letter to the NFD from Kurt Krieg with Mountainside Partners. In PF32, Mr. Krieg clarifies that all emergency access roads that are required by state or county code would be paved and would meet required standards. In addition, the letter clarifies that the circulation exhibits in the EIR are concept-level designs and that the Northstar Community Services District (NCSD) and NFD would need to approve and sign-off on the project's small lot final maps and civil improvement plans and that the civil improvement plans would comply with all state and local requirements related to emergency access and loop/dead end roads. Additionally, the letter notes that the MVWPSP would comply with NFD/NCSD's defensible space ordinance.

Kathi Heckert

PF16

From: Lorraine Comanor <lcomanor@sbcglobal.net>
Sent: Friday, June 03, 2016 7:28 AM
To: Placer County Board of Supervisors
Cc: Kathi Heckert
Subject: Martis Valley West and Brockway campground projects

Dear Board of Supervisors,

As a longtime Truckee resident, I am distressed about the plans to develop the Martis Valley ridge line. The traffic on 267 is already gridlocked during the high seasons. Route 267 is the main exit to route 80; if back-upped further, it could create a disaster in the event of a fire. Martis Valley is one of the few undeveloped areas where we as a community walk together and with our dogs. To encroach on it, and to make us pay for it through taxes used to support Caltrans is a travesty. I understand that the 750 planned homes would be permitted a roof height of 70 feet, as compared to the 35 feet allowed in Truckee, which would spoil the ridge line. Also, during dry years, our current residents are forced to restrict water use. Thousands of new people will put a severe strain on already limited resources. Please reconsider this ill-advised plan. PF16-1

Sincerely,

Lorraine Comanor M.D.

RECEIVED
JUN 03 2016
PLANNING DEPT.

PF16 — Lorraine Comanor, M.D. June 3, 2016

PF16-1 The comment expresses opposition to the project, citing concerns related to traffic, emergency evacuation, visual impacts and ridgelines, and water supply. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF17

From: Kathi Heckert
To: Stacy Wydra; Phil Frantz; Gerry Haas; Andy Fisher; Lisa Carnahan; Justin Hansen; Stephanie Holloway
Cc: Paul Thompson; EJ Ivaldi; "Kurt Krieg"; Whit Manley (WManley@rmmenvirolaw.com); Fran Ruger; Sydney Coatsworth; Suzanne Enslow; "Adrienne Graham" (algraham@surewest.net)
Subject: FW: CORRESPONDNECE MVWPSP | RAY GARLAND - PLEASE VOTE NO TO MARTIS VALLEY WEST
Date: Monday, June 6, 2016 8:01:20 AM

Hello DRC & Applicant and Ascent

Please see comment below. This has been forward to the Planning Commissioners.

Thank you

Kathi Heckert, Senior Board /Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

From: Ray Garland [mailto:raygarland2@gmail.com]
Sent: Friday, June 03, 2016 8:42 PM
To: Placer County Board of Supervisors
Cc: Kathi Heckert
Subject: PLEASE VOTE NO TO MARTIS VALLEY WEST

To Whom it May Concern:

Please vote NO to the Martis Valley West Project. My strongest concern is the tragic traffic jam that could occur if this project was built out and we had a major forest fire. Highway 267 would be a major escape route. Threatening that viability with more homes and consequently, more traffic, would be a grave mistake. PF17-1

Sincerely,

Ray Garland
Tahoe City homeowner
President, Highlands Homeowners Association

PF17

Ray Garland, President
Highlands Homeowners Association
June 3, 2016

PF17-1 The comment expresses opposition to the project, citing concerns related to traffic and emergency evacuation. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF18

From: Kathi Heckert
To: Stacy Wydra; Phil Frantz; Gerry Haas; Andy Fisher; Lisa Carnahan; Justin Hansen; Stephanie Holloway
Cc: Paul Thompson; EJ Ivaldi; "Kurt Krieg"; Whit Manley (WManley@rmmenvirolaw.com); Fran Ruger; Sydney Coatsworth; Suzanne Enslow; "Adrienne Graham" (alograham@surewest.net) (alograham@surewest.net); Huey Nham
Subject: FW: Economic Report? Re: 6-9-16 PC Agenda - Tahoe location - Martis Valley West Specific Plan staff report available
Date: Monday, June 6, 2016 9:30:54 AM
Attachments: 06-09-16 Final agenda Tahoe.pdf

FYI – below comment. Some have already received comment below but wanted to include everyone.

Thanks

Kathi Heckert, Senior Board /Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

From: Jennifer Quashnick [mailto:jqtahoe@sbcglobal.net]
Sent: Friday, June 03, 2016 9:19 PM
To: Kathi Heckert; Stacy Wydra
Subject: Economic Report? Re: 6-9-16 PC Agenda - Tahoe location - Martis Valley West Specific Plan staff report available

PF18-1

Hello,
I can not locate the "Martis Valley West Parcel Specific Plan Economic Viability Analysis (May 2016)" that is referred to as evidence for rejecting Alternatives 3 and 5 (see Attachment H). Please provide this as soon as possible.
Thank you,
~Jennifer

From: Kathi Heckert <KHeckert@placer.ca.gov>
To: Kathi Heckert <KHeckert@placer.ca.gov>
Sent: Friday, June 3, 2016 9:16 AM
Subject: 6-9-16 PC Agenda - Tahoe location - Martis Valley West Specific Plan staff report available

Hello Interested Parties -

Please find agenda attached.

Click on link below to view staff report.

http://www.placer.ca.gov/departments/communitydevelopment/planning/pchearings

Thank you.

Kathi Heckert, Senior Board/Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

PF18

Jennifer Quashnick, Conservation Consultant
June 3, 2016

PF18-1 The comment requests the "Martis Valley West Parcel Specific Plan Economic Viability Analysis" dated May 2016. This analysis was provided to the commenter on June 7, 2016 (see also response to comment PF95-3).

PF19

The Staff report before you for the June 9 Planning Commission meeting is 340 pages with all the attachments. You must ask yourselves if you have had an adequate amount of time to review the staff report, FEIR, DEIR, etc. before making any recommendations. I request you table and DENY the Martis Valley West Parcel Specific Plan EIR as proposed, request re-circulation (reasons within comments below) and request another hearing after a sufficient amount of time has been granted to review the documentation. The MVWPSP EIR in its current form is flawed and environmental analysis and response to comments are inadequate, dismissive or incomplete. PF19-1

The North Tahoe Regional Advisory Council meeting which only had a week to review documentation resulted in a recommendation, not to make a recommendation to your commission. They did approve a Motion to recommend the Planning Commission postpone their action on this item for 30 days to allow for ample time to review the Final EIR. (Placer staff ignored this request as you are hearing the project June 9) Further, that the Planning Commission be aware there are significant concerns with the project whether development is on the east or west side of Highway 267.
This process is being steamrolled with no answer from Placer Staff: What's the hurry?

A Development Agreement (not part of DEIR or FEIR released was released in staff report June 2, 2016) and revised Development Standards (third revision: May 2014, Oct 2015 and most recent May 2016) are among additional pages recently released which you will be asked to approve along with overriding considerations. Is seven (7) days enough time to review and make an informed and valued recommendation? I do not believe so.
This process is being steamrolled with no answer from Placer Staff: What's the hurry?

It's difficult to read over 2,000+ pages and glean comprehensive comments in a short amount of time.
I am providing a table of contents to assist you with my comments to date.

TABLE OF CONTENTS

I. DENY and RE-CIRCULATE the Martis Valley West Parcel Specific Plan EIR	Pages 1-3
II. ALTERNATIVE 5 (released in FEIR documentation) could be modified	Pages 3-8
III SIGNIFICANT AND UNAVOIDABLE IMPACTS	Pages 9-18
IV. PROPOSED SECONDARY EMERGENCY VEHICLE ACCESS ROAD CRITERIA	Pages 19-23
V. WORKFORCE HOUSING REQUIREMENT	Pages 24-27
VI. DEVELOPMENT AGREEMENT, DEVELOPMENT STANDARDS	Pages 27-31
VII. CLOSING COMMENTS	Pages 31-32
VIII ARTICLES FROM PUBLIC AND ENVIRONMENTAL GROUPS	Page 33
IX. CEQA REFERENCES THAT MUST BE CONSIDERED	Pages 34-35

I. DENY and RE-CIRCULATE the Martis Valley West Parcel Specific Plan EIR

I am requesting you **DENY the Martis Valley West Parcel Specific Plan (MVWPSP) as proposed and request recirculation of the environmental impact report** as a new alternative: Alternative 5: Reduced Density East Parcel (without conservation easement) was added to the FEIR without any analysis or opportunity for public/agencies to comment. Along with inadequate, dismissive responses to DEIR impacts and suggested mitigations this project must be re-circulated.

Have any of you toured the west parcel site? The locations topography is challenging to understand (if you are just relying on maps provided) unless you have actually "seen" the ridgetop portion of the development that lies outside the Tahoe Basin but shares a boundary with Tahoe Basin land atop the same ridgeline you cannot comprehend the issues. Have you toured the east parcel where you will find less issue with topography and much less potential for Tahoe Basin impacts? By touring the site your commission recommendations will carry greater weight and fundamental understanding of the environmental impacts. I request you **DELAY your recommendations and request another hearing of the project after you can tour the sites.**

This is not just about the proposed project (Specific Plan): it's about the location on a ridgetop abutting the Tahoe Basin Boundary line. This is raw land never envisioned to be anything more than Timber Production Lands in the Martis Valley Community Plan.

Lets start at the beginning. The Martis Valley Community Plan was updated December 16, 2003 approving future development locations and proposed entitlements (not development rights). The Martis Valley Community Plan (MVCP) envisioned development on the East Parcel not the West Parcel. ***Reference MVCP Page 52 Community Design MVCP: 3. East Valley Community - Design/Development Standards: The Martis Valley Community Plan Land Use Diagram designates a low density residential area including a small commercial site*** *east of SR267* ***and east of Northstar-at-Tahoe****. Following the expiration of the TPZ, this area is available for the development of a large residential project. New development in this area shall be permitted only where it is found to be consistent with the following design/development standards and is developed consistent with an approved comprehensive master plan.* PF19-1 cont.

Reference: MVCP Figure 1 Land Use Diagram identifies the east parcel for residential development and the west parcel as Forest land.

Initially a Tahoe Basin Area Plan, proposing a gated community with 112 luxury units and commercial buildings, on a Tahoe ridge-line was included in the Martis Valley West Parcel Specific Plan.

The Area Plan received so much public resistance, criticism and outcry from community members and environmental groups- it was removed from the MVWPSP and is now proposed as a separate project: The 550 unit Brockway Campground.

Mountainside Partners is proposing both projects separately but continues to state that they are reducing development from 1360 units. Simple math: 760 units plus 550 campsites (in the same location, atop a ridge, connected by an evacuation fire road) is 1310 total units so the cumulative impacts of both projects must be accounted for in the environmental analysis. The FEIR has not adequately done so and dismissed the Brockway Campground impacts as being unnecessary as the project is within the Tahoe basin. The DEIR analysis is incomplete and flawed requiring you as a commission to: DENY the project and request re-circulation with additional analysis

The only reason there are two separate projects proposal on the same ridgetop:
1). one in the Tahoe Basin -Brockway Campground
2). one outside the Tahoe Basin - MVWPSP
Is the public made such a raucous that the developer feared the entire Martis Valley West Parcel Specific Plan was in jeopardy of not getting approval.

Reference:Placer County web:https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/martisvalleywestparcel (In August 2013, an application was submitted to Placer County for the MVWP Specific Plan. The Specific Plan consists of the East Parcel and West Parcel and included approximately 270 acres of land in the Tahoe Basin. A draft Area Plan was prepared for 112.8 acres on the West Parcel of the Basin portion of the MVWPSP for consideration by Placer County and TRPA. A Notice of Preparation for a Draft EIR/EIS was published in March 2014. A draft Specific Plan was submitted to the County in May 2014 and a draft Area Plan was submitted to TRPA in June 2014.) ***The applicant now proposes to revise the MVWPSP to remove the portion of the West Parcel that is in the Tahoe Basin (and within the jurisdiction of TRPA), including the 112.8-acre area that was subject to the Area Plan. As a result, the Area Plan would not be part of the MVWPSP.*** (The Area Plan is now suspended: not terminated and the Tahoe basin acres are proposed as 550 unit campground) PF19-1 cont.

Fast forward: East West Partners (now: Mountainside Partners) along with Sierra Pacific Industries (SPI) entered into a private business deal an "Opportunity Agreement" (MVOA) with Mountain Area Preservation (MAP) and Sierra Watch (SW) on **July 16, 2013**. This agreement cannot be construed as a development agreement nor binding in any way for the transfer of proposed entitlements in your approval cycle.

At the **May 12, 2016** North Tahoe Regional Advisory Council: Mountain Area Preservation (MAP) and Sierra Watch (SW) representatives said that with the Brockway Campground included, the proposed project went far beyond what they agreed to in the MVOA and pointed out it would be irresponsible to make decisions at such a fast pace on projects that will span generations. They noted that these decisions will "outlive us all", and we shouldn't rush this.

At the **May 25, 2016** TRPA Governing Board meeting MAP and SW (along with the League to Save Lake Tahoe and members of the public) representatives made it clear to TRPA they need to continue to heavily weigh in on the proposed MVWPSP project as there are many impacts to the Tahoe Basin clearly ignored in the FEIR and dismissed as unnecessary to study as part of the overall cumulative impacts.

II. ALTERNATIVE 5 (released in FEIR documentation) could be modified

If Mountainside Partners and SPI are serious about any development project and the permanent protection of 6,000+ acres of conservation land, you as a commission, must DENY the EIR as proposed and request re-circulation of the environmental document to be further analyzed to insure DEIR conclusions are accurate and allow the public and agencies to comment on Alternative 5 which has not been before the public/agencies for comment until the FEIR was released and should be open for discussion, interpretation and possible modification. PF19-2

Wikipedia: In arguments, compromise is a concept of finding agreement through communication, through a mutual acceptance of terms—often involving variations from an original goal or desire. In human relationships "compromise" is often said to be an agreement that no party is happy with.

Webster: Settlement of differences by arbitration or by consent reached by mutual concession. Something intermediate between or blending qualities of two different things.

Modifying and analyzing the newly released (in FEIR): Reduced Density Alternative 5 - 418 units on 200 acres on the east side of SR 267 where development proposed entitlements are currently approved by the Martis Valley Community Plan and adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate, will achieve a majority of the project objectives 22 out of 25 listed below .

Adding a "Conservation Easement" (which still can be purchased by a land trust) to Alt 5, will preserve thousands of acres in the spirit of protecting conservation land and COMPROMISE and will ELIMINATE the Visual Significant and Unavoidable impact to less –than-significant as the project is not on a ridgetop abutting the Lake Tahoe basin boundary line. The biological impact stated to be a reason not to use the east parcel is subjective and requires further analysis before a scientific answer to impact concerns can be accurately made.

DEIR 19.1.1 Attainment of Project Objectives

.... one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CCR Section 15126.6[a]). Chapter 3, "Project Description," articulates the following MVWPSP project objectives:

1. Provide new residential development consistent with the vision, goals, and policies of the MVCP: A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. **The Martis Valley Community Plan (MVCP) approved proposed entitlements on the east parcel not the west parcel** PF19-2 cont.

0. The County will promote efficient use of land and natural resources and will encourage "in fill" development (Policy 1.A.1). Removed in the FEIR as Placer County does not have a definition of infill. (Response to comment IO51-17)

2. Conserve large, intact, and interconnected areas of natural open space that contributes to the last remaining habitat linkages between the Sierra Nevada and Mount Rose Wilderness Area in the Carson Range (Policy 1.A.6 A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

3. Minimize habitat fragmentation by development and roads to protect open space from human encroachment (Policy 1.A.6). : A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. TPZ overlay and current on-going timber harvest practices already disturb wildlife on the east parcel today

4. **Consider the regional implications of development in the Martis Valley on resources outside of the Valley (i.e., Truckee River, Lake Tahoe Basin, Carson Range, and Sierra Nevada**) (Policy 1.A.7). Any development on the east or west parcel threatens the exceedance of the Tahoe Basin maximum Vehicle Miles Traveled threshold along with the recently updated (2012) Tahoe Basin Regional Plan envisioned Goals and Policies and updated Code of Ordinances to concentrate development in Town Centers. Level Service of F violates the Martis Valley Community Plan policy 5.A.8 Alternative 1: No Project achieves this objective.

5. Ensure that long-term conservation of important resource lands is achieved through a combination of regulatory actions, acquisition of easements, purchase of development rights, and both public and private land acquisitions (Policy 1.A.8) : A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

6. Encourage the concentration of multi-family housing in and near village centers and neighborhood commercial centers (Policy 1.B.1: A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

7. Encourage the planning and design of new residential subdivisions to emulate the best characteristics (e.g., form, scale, and general character) of existing, nearby neighborhoods (Policy 1.B.2). : A Modified Alt 5 on the east parcel adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. Nearby neighborhoods were not defined for comparison in EIR: Northstar, Truckee, etc ?

8. Require residential land project design to reflect and consider natural features, noise exposure of residents, **visibility of structures**, circulation, **access**, **and the relationship of the project to surrounding uses** (Policy 1.B.4). : A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. **Maps in the FEIR prove that the development is still on top of the ridge, though outside the Tahoe basin boundary. It's a shared ridgeline (see Exhibit 3-7 Page 9 of 35 below). Removing the project from a ridgetop shared with Tahoe basin boundary ELIMINATES the Visual Significant and unavoidable Impact 9.9.**

9. Require that significant natural, open space and cultural resources be identified in advance of development and incorporated into site-specific development project design (Policy 1.B.9). : A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

10. Identify available opportunities and designate land for small commercial centers where some of the needs of local area residents can be met, eliminating the need for trips outside the area (Policy 1.C.3).). : A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. The MVCP plan has designated the east parcel for residential and commercial development.

PF19-2 cont.

11. Encourage the sustained productive use of forestland as a means of providing open space, maintaining the quality of Martis Valley's scenic vistas and to conserve other natural resources (Policy 1.F.1).). : A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. Timber Harvest Management Plans address the east parcel.

12. Encourage the preservation of timber producing lands as regional open space, and protect these areas from urban encroachment (Policy 1.J.1). : A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. Timber Harvest Management Plans address the east parcel.

13. Implement a density transfer and retirement by permanently retiring 600 East Parcel residential units and transferring 760 residential units and 6.6 acres of commercial uses from the East Parcel to the West Parcel while preserving in perpetuity 6,376 acres in conservation lands. Only 1 of 2 objectives met by Alternative 3 and not Alt 5 modified

14. Contribute to a large, continuous expanse of open space east of SR 267 by ensuring the permanent preservation of the East Parcel. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. 6,000+ acres still can be preserved minus development acreage proposed.

15. Minimize isolated development that leads to fragmentation of open space and natural resources by developing on lands in proximity to existing development. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

16. **Minimize visual impacts of development** by using the natural features and terrain of the project site to screen buildings. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. **Removing the project from a ridgetop shared with Tahoe basin boundary line ELIMINATES the Visual Significant and Unavoidable Impact 9.9.**

Placer County Land Use code VISUAL AND SCENIC RESOURCES: 1.K.1. The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that: a. Avoids locating structures along ridgelines and steep slopes; b. Incorporates design and screening measures to minimize the visibility of structures and graded areas; c. Maintains the character and visual quality of the area. Removing the project from a ridgetop shared with Tahoe basin boundary eliminates the Visual Significant and unavoidable Impact 9.9.

17. Limit new infrastructure and disturbance by developing on lands in proximity to existing development. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective.

18. Enhance and maintain existing trail system and associated recreational uses, such as cross-country skiing, snowshoeing, hiking, and biking trails Only 2 of 2 objectives met by Alternative 3 and not Alt 5 modified. Although SPI could allow recreational uses that could be met by A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

19. Implement a land use plan that is responsive to **community concerns**, such as **visual character**, **traffic management**, parking availability, recreational facilities, **environmental issues**, and the desire for expanded community services and amenities. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective: Especially because it is not atop a ridge-line that abuts to Tahoe basin lands. **This objective is of particular concern as the community has clearly stated on numerous occasions at many meetings and in written comments that we are not in-favor of proposed development on the West parcel due to scenic, recreational and evacuation issues just to name a few.**

20. Reduce reliance on automobiles by providing onsite services and amenities, a transit stop, and extensive cross-country skiing, hiking, and biking A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective . PF19-2 cont.

21. **Develop a project that is consistent with the planning guidelines and principles of adopted plans and policies, particularly the MVCP**. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. **The Martis Valley Community Plan (MVCP) approved proposed entitlements (not development rights) on the east parcel not the west parcel**

22. Create a development that draws upon the historic Sierra and Tahoe regional architectural traditions. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

23. Develop a financially sustainable project that does not require the diminishment of services to existing residents. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. The FEIR states that financial feasibility (sustainability?) will be determined by the Board and not environmental documentation. The public/agencies have not been privy to what is considered financially in-feasible so we cannot craft comments and neither can the Planning Commission. Attachment 3 information is subjective

24. Incorporate sustainable design concepts to ensure long-term preservation, the enhancement of resources, and the reduction of site impacts. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective

25. **Reinforce the North Lake Tahoe** region, including the Martis Valley, as a four-season destination resort. A Modified Alt 5 on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate will achieve this objective. **This objective further demonstrates impacts to the Tahoe Basin must be analyzed**

A REDUCED DENSITY EAST PARCEL ALTERNATIVE adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate is logically feasible and achieves most of the project objectives listed above.
By modifying Alt 5 Reduced Density project on east parcel, without a doubt, will ELIMINATE
1). Tahoe dark skies violation and skyglow impacts,
2). scenic violation impacts because it will not be located atop a shared Tahoe basin ridge-line
3). recreational conflict with Tahoe Rim Trail Users
4). impact to the Tahoe basin by utilizing the Fiberboard Freeway for secondary emergency evacuation as it will not be located on a shared Tahoe basin ridge-line
The comparison of Alternatives shows that a Modified Alternative 5 with Conservation Easement can and should be considered the Environmentally Superior Alternative.

Alternatives evaluated in this Draft EIR are:

- **Alternative 1: No Project – No Development Alternative**, which assumes no new development occurs on either the West Parcel or the East Parcel;
- **Alternative 2: No Project – Martis Valley Community Plan Alternative**, which assumes development in accordance with existing land use designations and zoning under the existing MVCP. This would include up to 1,360 residential units and up to 6.6 acres of commercial on the East Parcel; timber harvest in compliance with existing Timber Harvest Permits; and cessation of unauthorized recreational uses (because of liability issues). PF19-2 cont.
- **Alternative 3: Reduced Density Alternative**, which would reflect the same MVWPSP as proposed, but would reduce the number of residential units on the West Parcel by 45 percent (a reduction of 342 units).
- **Alternative 4: Reduced Footprint, Hotel Alternative**, which assumes development of 500 residential units, a 100-room hotel, a recreational parking lot with 150 spaces, and commercial development and trails consistent with the proposed project on the West Parcel.
- **Alternative 5: East Parcel Reduced Density Alternative**, which assumes development of 418 units on 200 acres of the East Parcel, designating the remainder of the current East Parcel development area Forest and zoning it TPZ, and leaving the existing Forest designation and TPZ zoning over the West Parcel. Alternative 5 would not involve placing the East Parcel in permanent conservation.

Placer County Land Use code VISUAL AND SCENIC RESOURCES: 1.K.1. The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that: a. Avoids locating structures along ridgelines and steep slopes; b. Incorporates design and screening measures to minimize the visibility of structures and graded areas; c. Maintains the character and visual quality of the area.

Removing the project from a ridgetop shared with Tahoe basin boundary ELIMINATES the Visual Significant and unavoidable Impact 9.9.

The FEIR violates Placer County Land Use Visual and Scenic Resources code 1.k.1.

The Planning Commission MUST DENY the FEIR as proposed request re-circulation to correct inadequacies and provide additional analysis to insure DEIR conclusions.

Alternatives comparison of impacts

Table 2-2 Summary Environmental Effects of the Alternatives Relative to the Proposed MVWPSP

Environmental Topic	Proposed MVWPSP	Alternative 1: No Project – No Development Alternative	Alternative 2: No Project – MVCP Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Footprint, Hotel Alternative	Alternative 5: East Parcel Reduced Density Alternative
Land Use and Forest Resources	Less than significant (Project and Cumulative)	Less	Similar/Greater	Similar/Less	Similar/Less	Similar/Less
Population, Employment, and Housing	Less than significant (Project and Cumulative)	Less	Similar	Similar/Less	Similar/Less	Similar/Less
Biological Resources	Less than significant with mitigation (Project and Cumulative)	Less	Greater, potential for a new significant and unavoidable impact	Similar/Less	Similar	Similar/Less
Cultural Resources	Less than significant with mitigation (Project and Cumulative)	Less	Similar	Similar/Less	Similar/Less	Similar/Less
Visual Resources	Less than significant (Project) Significant and unavoidable (Cumulative)	Less, would avoid a significant and unavoidable impact	Similar, same significant and unavoidable impact	Similar/Less, same significant and unavoidable impact	Similar/Less, same significant and unavoidable impact	Similar/Less, same significant and unavoidable impact
Transportation and Circulation	Significant and unavoidable (Project and Cumulative)	Less, would avoid a significant and unavoidable impact	Greater overall, same significant and unavoidable impacts	Similar/Less, same significant and unavoidable impacts	Similar/Less, same significant and unavoidable impacts	Similar/Less, same significant and unavoidable impacts
Air Quality	Less than significant with mitigation (Project and Cumulative)	Less	Similar/Greater	Similar/Less	Similar	Similar/Less
Greenhouse Gas Emissions and Climate Change	Potentially significant and unavoidable (Cumulative)	Less, would avoid a potentially significant and unavoidable impact	Similar/Greater, same potentially significant and unavoidable impact	Similar/Less, same potentially significant and unavoidable impact	Similar, same potentially significant and unavoidable impact	Similar/Less, same potentially significant and unavoidable impact
Noise	Less than significant with mitigation (Project and Cumulative)	Less	Similar/Greater	Similar/Less	Similar/Greater	Similar/Less
Geology and Soils	Less than significant with mitigation (Project and Cumulative)	Less	Similar	Similar/Less	Similar/Less	Similar/Less
Hydrology and Water Quality	Less than significant with mitigation (Project and Cumulative)	Less	Similar/Greater	Similar/Less	Similar/Less	Similar/Less
Utilities	Less than significant with mitigation (Project and Cumulative)	Less	Similar/Greater	Similar/Less	Similar/Less	Similar/Less
Public Services and Recreation	Less than significant with mitigation (Project and Cumulative)	Less	Similar/Greater	Similar/Less	Similar/Less	Similar/Less
Hazards and Hazardous Materials	Less than significant with mitigation (Project and Cumulative)	Less	Similar	Similar/Less	Similar/Less	Similar/Less

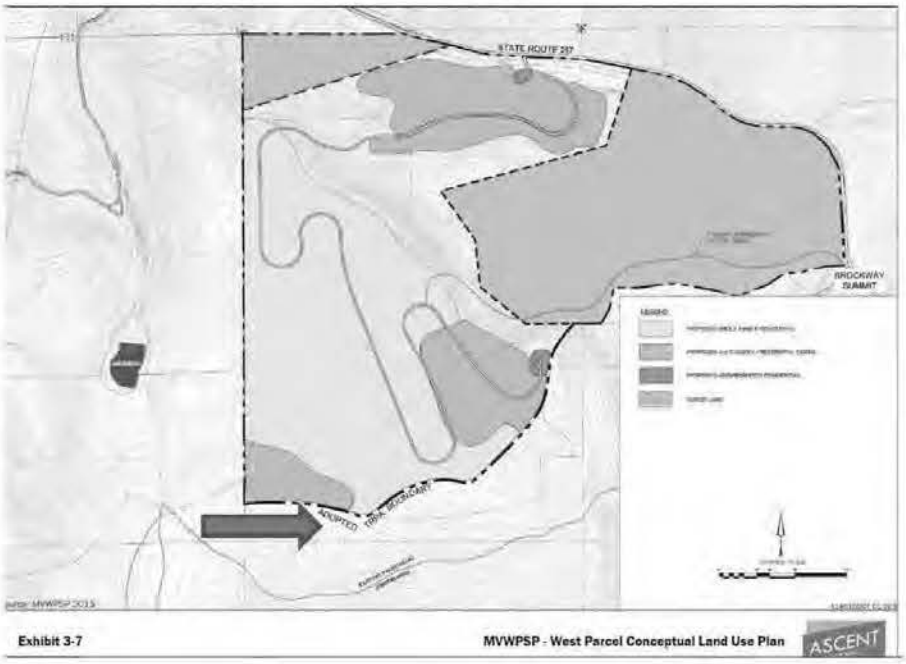
PF19-2 cont.

Modifying Alternative 5, on the east parcel: adding a conservation easement, along with additional analysis to insure DEIR conclusions are accurate **will become the "environmentally superior alternative**

CEQA requires recirculation of an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review, but before certification (CCR Section 15088.5). New information is not "significant" unless the EIR is changed in a way that **deprives the public of a meaningful opportunity** to comment upon a substantial adverse environmental effect of the project or **a feasible way to mitigate or avoid such an effect** (CCR Section 15088.5)

From FEIR Master Responses CONCLUSION The Draft EIR relies primarily on CEQA Guidelines Section 15126.6 in its consideration and evaluation of alternatives, stated as follows: An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternative. **An EIR need not consider every conceivable alternative to a project. Rather** it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is not an ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

This diagram demonstrates the location of the project and the relationship to theTahoe Basin Boundary line on the ridge top. Many commenters asked for maps to include topographical numbers be added to all maps to assist in informing the public/agencies. The request for topo numbers was ignored.



PF19-2 cont.

III SIGNIFICANT AND UNAVOIDABLE IMPACTS

There are six Significant and Unavoidable (SU) Impacts no matter what alternative is selected.
And just because impacts are identified as Significant and Unavoidable doesn't necessarily mean these impacts or the project should be approved! I am requesting you DENY the project as proposed until adequate environmental analysis and an environmentally superior alternative with no Significant and Unavoidable impacts can be completed.

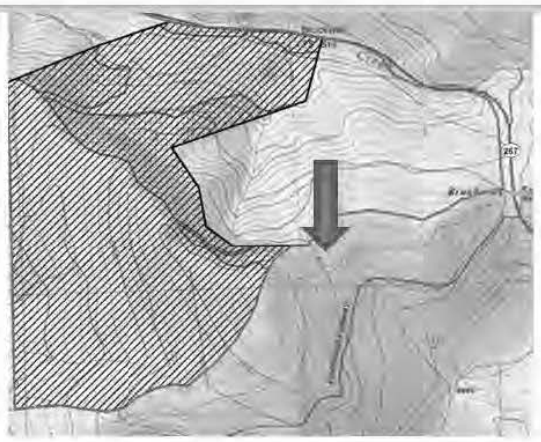
PF19-3

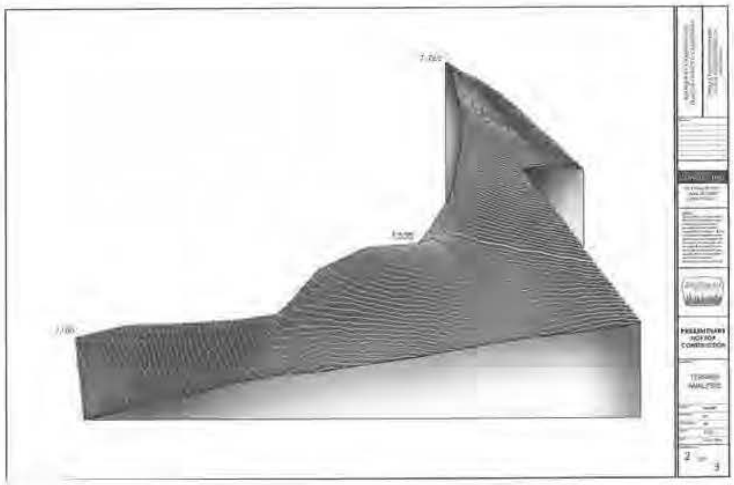
VISUAL RESOURCES (CHAPTER 9) **(This impact can be ELIMINATED when east parcel where the MVCP approved the residential and commercial development is selected)**

1. Cumulative Impact 9-9: Cumulative effects on light and glare
Skyglow: the effect when lights resonate against the dark skies from atop and just below the ridgeline. No amount of modelling can predict the effects. The project will get built and oops sorry Tahoe we violated dark skies ordinances and objectives. **Visual Significant and Unavoidable impacts <u>will be</u> reduced to less-than-significant (not at all) if the project is built on the east parcel, off the ridgetop of the west parcel shared by the Tahoe Basin Boundary line.**

Blue arrow Elevation is 7600 feet. It was requested that all maps show elevation in the FEIR. This request was ignored and not provided. Also RELATIONSHIP to Lake Tahoe be provided in all maps was dismmissed and ignored.

PF19-3 cont.





The Brockway Campground on the Tahoe Basin side of the ridgeline contour shows 7,535 to 7,780 (the MVWPSP project location above) elevation so tree removal will impact viewshed and create greater visibility of structures on the Martis Valley West Parcel side of the boundary outside the Basin with extensive tree removal from the campground project (building site, defensive space, roads, etc. will require trees to be removed) This isn't rustic camping. The two separate projects are inseparable for cumulative impacts of tree removal, visual impacts, traffic etc.)

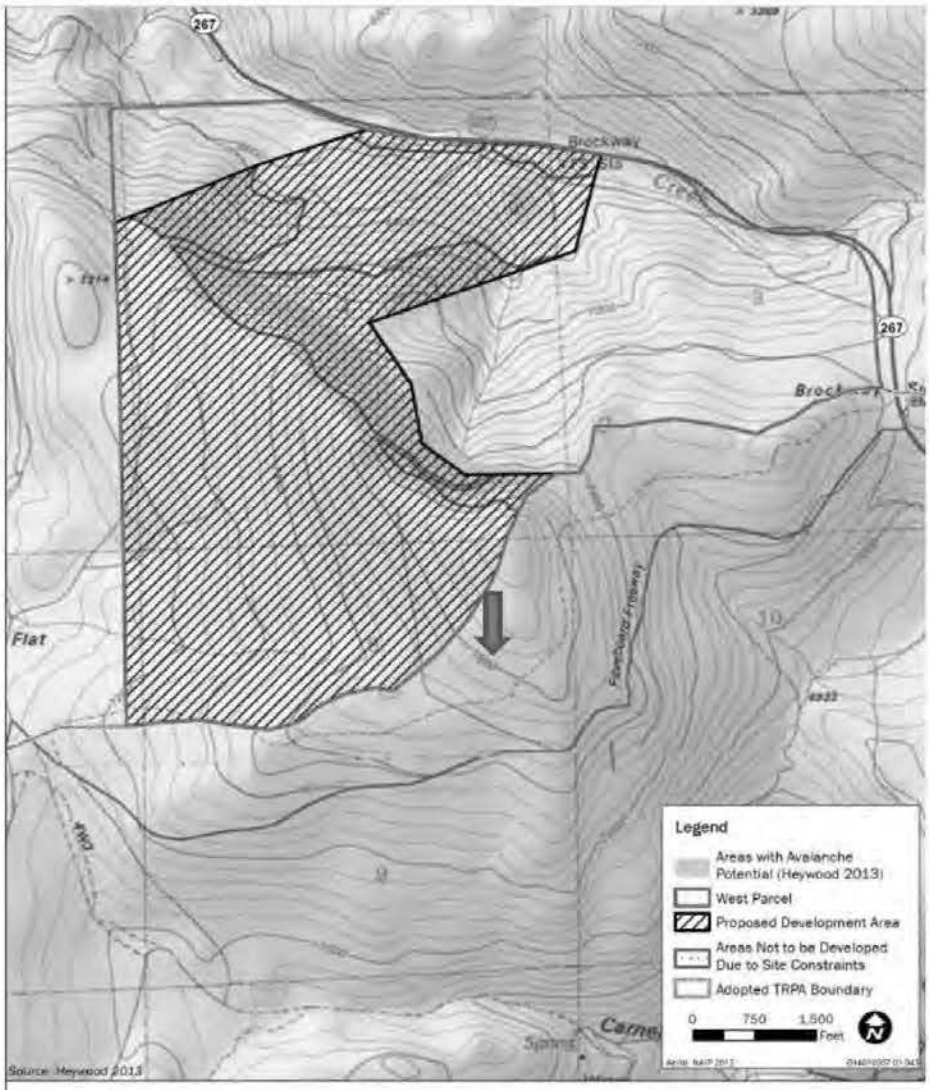


Exhibit 14-3 **West Parcel Avalanche Risk Areas**

PF19-3 cont.

Blue and orange arrows (approximate topo location) shows 7600 ft elevation and relationship to Lake Tahoe: with cumulative tree removal (building site, defensible space, road and other infrastructure) from MVWP and Brockway campground the liklihood of buildings being visible from Lake Tahoe is much greater than the modeling anaysis provides in the DEIR. The FEIR dismissed tree removal analysis from the Brockway Campground as being necessary. Further analysis in the EIR is required to assure no visibility from Lake Tahoe. I am requesting you **DENY** the project as proposed until adequate tree removal and visual anaysis is completed

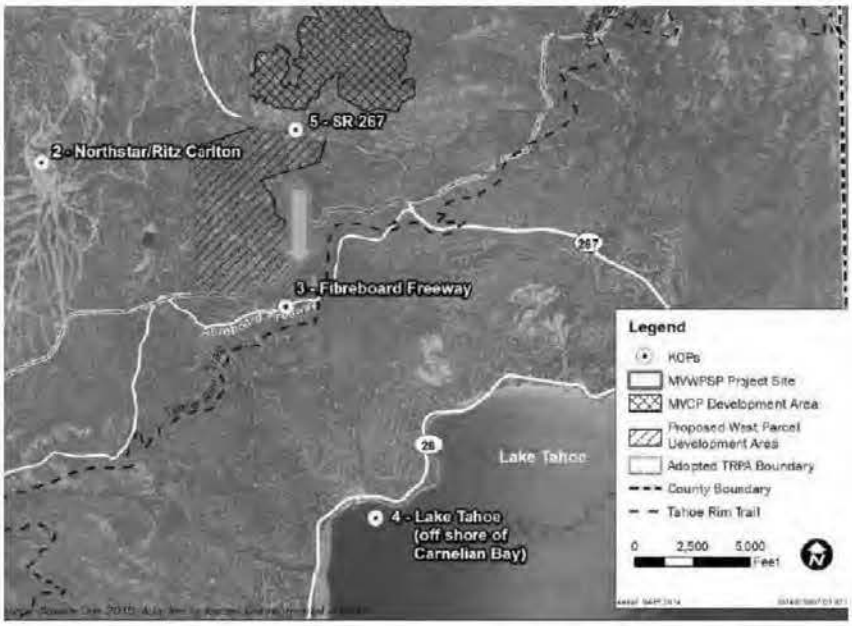


Exhibit 9-19 **Key Observation Points**

PF19-3 cont.

Proposed site plan below shows the proposed development on the ridgetop

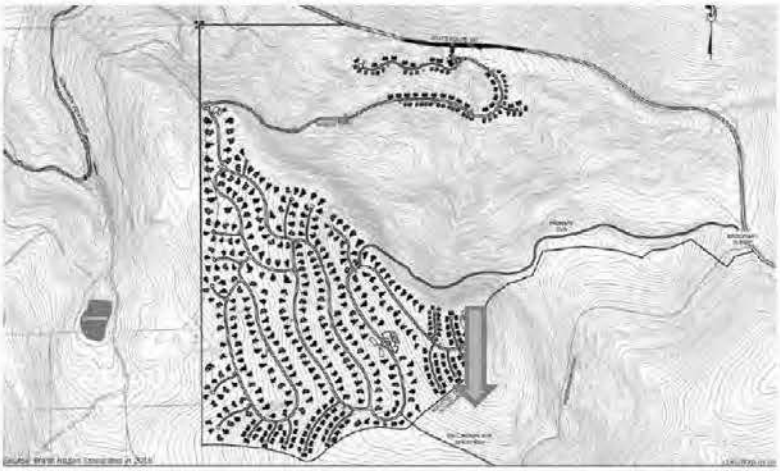


Exhibit 9-26 **Conceptual Site Plan Used to Simulate Buildout of the Project Site**

"Outdoor light fixtures for parking areas, buildings, pedestrian areas, and roadways would be shielded, directed downward to preserve the night sky, and directed away from residential areas to minimize light and glare effects on adjacent residences." Page 3-19 DEIR. Although lights will be pointed downward, any lights at the top of the ridge-line will illuminate that ridge where no light exists today.

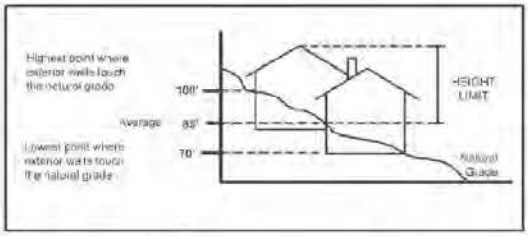
Building Heights

Table 3-3 presents the maximum proposed building heights (see the Development Standards in Appendix B of the Specific Plan). Most residences and cabins would have a maximum building height of three stories, not to exceed 42 feet above grade. Townhomes could be up to 50 feet in height, commercial buildings could be up to 60 feet, and condominiums could be up to 75 feet. In addition, per Specific Plan Policy LU-3.6 and Development Standards (MVWPSP Appendix B), building heights on the knoll shall not exceed 60 feet. Chimneys, vents, and other architectural or mechanical appurtenances on buildings may be a maximum of fifteen (15) percent higher than the height of the applicable zone. No building or structure would be constructed or altered to exceed the height limits identified in the MVWPSP. The height limits for buildings and structures would be measured in accordance with Placer County Zoning Ordinance, Section 17.54.020, as the vertical distance from the highest point of the structure to the average of the highest and lowest points where the exterior walls touch the natural grade (Exhibit 3-8).

Table 3-3 Proposed Maximum Building Heights

Structure	Maximum Proposed Height (above grade)
Single-Family Residences	42 feet
Cabins	42 feet
Townhomes	50 feet
Commercial Buildings / Owners/Recreational Amenities	60 feet
Buildings on the Knoll	60 feet
Condominiums	75 feet

Source: Placer County Zoning Ordinance 2015



Source: Placer County Zoning Ordinance, Figure 17.54.020

Exhibit 3-8 **Measurement of Building Height**

PF19-3 cont.

Building height is measured by grade not actual height that could be seen for Lake Tahoe as demonstrated in Exhibit 3-8. It may be acceptable to use this method to calculate height but does not represent height that will actually be visible and with associated lighting.

The Staff Report statements below about light and glare being less than significant are just plain false. There is NO LIGHT SOURCES on ridgetop today, nor does Northstar, Martis Camp buildout have any factor as they are not located on the ridge top.

Visual Impacts

Per the Draft EIR the project would not create an adverse effect on scenic vistas, will not damage scenic resources within a Placer County-designated scenic route, degrade the existing visual character or quality of the site or its surroundings, would not result in new sources of light and glare, create visual impacts during construction. However, cumulatively, the project would create an significant and unavoidable impact on light and glare. Future projects, including the Brockway Campground, could result in new light sources and glare from outdoor lighting, campfires, and vehicles headlights that might be visible from nearby recreation areas or Lake Tahoe. However, as depicted in Impact 9—4, light sources and glare from the project area would not be visible from the Lake Tahoe Basin, or nearby recreation areas such as the

Page 37

Fibreboard Freeway. While future projects could result in new sources of light and glare visible from nearby recreation areas or the Lake Tahoe Basin, the MVWPSP would not substantially contribute to these effects. Therefore the MVWPSP would not result in a considerable contribution to cumulative impacts from light and glare visible from nearby recreation areas or the Lake Tahoe Basin.

PF19-3 cont.

Past and present projects within the Martis Valley have created substantial sources of light that have adversely affected nighttime views in Martis Valley. These sources of light would likely increase as a result of future projects including buildout of Martis Camp subdivision, implementation of the Northstar Mountain Master Plan, construction of the Northstar Highlands Phase II development, and other residential development within the Martis Valley. As show in Exhibit 9-34 of the Draft EIR, the existing nighttime views in Martis Valley are heavily influenced by lighting from residential neighborhoods and commercial and resort development. Light from the project would be less prominent than existing light sources and would not, by itself, result in a significant impact. However, while it is unlikely that all buildings would be simultaneously illuminated, the project would result in new light sources throughout approximately 662 acres that have no existing light sources. These new light sources from buildout of the MVWPSP would be clearly visible from Martis Valley and would introduce new light sources in a portion of the view that is not already affected by light, which would contribute to the existing adverse effects on nighttime views. Thus, the MVWPSP would result in a considerable contribution to a cumulatively significant impact on nighttime views.

TRANSPORTATION AND CIRCULATION (CHAPTER 10)

2. Impact 10-1: Impacts to intersection operations
3. Impact 10-2: Impacts to roadway segments
4. Cumulative Impact 10-8: Cumulative impacts to intersection operations
5. Cumulative Impact 10-9: Cumulative impacts to roadway segments

Any development on the east or west parcel threatens the exceedance of the Tahoe Basin maximum Vehicle Miles Traveled threshold along with the recently updated (2012) Tahoe Basin Regional Plan envisioned Goals and Policies and updated Code of Ordinances to concentrate development in Town Centers.
Level of Service F violates the MVCP. Alt 1 No Project achieves this objective.

PF19-4

The traffic analysis did not include truck trips for timber harvest on the east or west parcel with the proposed immediate overlay of TPZ requested in the EIR. The EIR must be re-circulated to accurately analyze traffic impacts.

The EIR consultant and Placer County avoid impact responsibility by stating CALTRANS is ultimately responsible for implementation. That said, Placer does not have a comprehensive plan with CALTRANS to begin to mitigate the LOS F standard that is being violated. You as commissioners must <u>DENY</u> the project until Placer County can, at the very least, provide a plan in this and all proposed projects environmental documentation to correct LOS F. Simply throwing $$$$ into an in-lieu fund in hopes enough will fill the coffer is absurd.

DEIR Mitgation info Executive Summary Section 2

Footer			
10 Transportation and Circulation			
Impact 10-1: Impacts to intersection operations The proposed project would worsen already unacceptable operations (i.e., already beyond the acceptable threshold) at the SR 267/I-80 WB Ramps, SR 267/Schaffer Mill Road/Truckee Airport Road and SR 267/Highlands View Road intersections during the winter peak hour.	S	Mitigation Measure 10-1a: Optimize signal timing at the SR 267/I-80 WB ramps intersection Prior to the Improvement Plan approval for the initial phase, the project applicant shall coordinate with Caltrans to optimize the traffic signal operations at the SR 267/I-80 WB Ramps intersection. Evidence shall be provided to the satisfaction of the Placer County	SU

NI = No Impact, LTS = Less than significant, PS = Potentially significant, S = Significant, SU = Significant and unavoidable

PF19-4

Table 2.1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Engineering and Surveying Division and Placer County Department of Public Works that the optimization will be implemented by Caltrans as warranted, or that a good faith effort has been made by the applicant to coordinate with Caltrans. Mitigation Measure 10-1b: Optimize signal timing at the SR 267/Schaffer Mill Road/Truckee Airport Road intersection Prior to the Improvement Plan approval for the initial phase, the applicant shall coordinate with Caltrans to optimize the traffic signal operation at the SR 267/Schaffer Mill Road/Truckee Airport Road intersection. Evidence shall be provided to the satisfaction of the Placer County Engineering and Surveying Division and Placer County Department of Public Works that the optimization will be implemented by Caltrans as warranted, or that a good faith effort has been made by the applicant to coordinate with Caltrans. Mitigation Measure 10-1c: Provide signage on Highlands View Road for motorists to access SR 267 NB via Ridgeline Drive and Northstar Drive The Improvement Plans for the first development of residential units of the MVWPSP shall show the construction and installation of a message sign on Highlands View Road. The sign shall be located at a sufficient distance from the Ridgeline Drive intersection to alert motorists that access to northbound SR 267 is via Ridgeline Drive (left from Highlands View Road) and Northstar Drive (right from Ridgeline Drive), so as to access the traffic signal at the SR 267/Northstar Drive intersection. The message sign and its use during the winter peak traffic conditions shall be required in perpetuity.	
Impact 10-2: Impacts to roadway segments The proposed project would worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28, resulting in a segment either degrading from acceptable LOS D to unacceptable LOS E, or exacerbating conditions on a segment operating at an unacceptable LOS E by an increase in V/C ratio of 0.05 or more, for both the summer and winter peak hours.	S	Mitigation Measure 10-2: Pay impact fee to Placer County for future roadway improvements to State Route 267 Prior to issuance of any building permits for each commercial or residential lot, the project shall be subject to the payment of traffic impact fees in effect for the Tahoe District, pursuant to applicable ordinances and resolutions. The applicant is notified that the following traffic mitigation fees(s) shall be required and shall be paid to the Placer County Department of Public Works: ▲ Countywide Traffic Limitation Conc/Artok 16.23.010, Placer County Code: The current total combined estimated fee for the entire project is $3,685,511.42 ($4,846 per single family residential unit). The fees were calculated using the information supplied. If the use or the square footage changes, then the fees will change. The actual fees paid shall be those in effect at the time the payment occurs.	SU
Cumulative Impact 10-8: Cumulative impacts to intersection operations The proposed project would exacerbate operations to unacceptable levels or exacerbate already unacceptable operations at the intersections shown in Table 10-18 and described below. ▲ SR 267/I-80 WB Ramps – operations would worsen as follows: ▼ Summer peak hour: LOS D to E (14 second increase in delay)	Would result in a considerable contribution to the cumulative	Cumulative Mitigation Measure 10-8a: Pay Placer County fee for future roadway improvements, including the SR 267/I-80 WB Ramps intersection Implement Mitigation Measure 10-2. The Town of Truckee TIF Program identifies the construction of a two-lane roundabout at this location. This improvement would reduce the traffic impact to a less-than-significant level during both the summer and winter peak hour under cumulative plus project conditions.	SU

NI = No impact, LTS = Less than significant, PS = Potentially significant, S = Significant, SU = Significant and unavoidable

Footer

Table 2-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
▼ Winter peak hour: LOS F operations exacerbated (19 second increase in delay) ▲ SR 267/I-80 EB Ramps – operations would worsen as follows: ▼ Winter peak hour: LOS F operations exacerbated (10 second increase in delay) ▲ SR 267/Brockway Road/Soaring Way – operations would worsen as follows: ▼ Summer peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) ▼ Winter peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) ▲ SR 267/Schaffer Mill Road/Truckee Airport Road – operations would worsen as follows: ▼ Summer peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) ▼ Winter peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) ▲ SR 267/Highlands View Road – operation would worsen as follows: ▼ Summer peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) ▼ Winter peak hour: LOS F operations exacerbated (delay exceeds 200 seconds) ▲ SR 267/Project Access Roadway – operation would exceed LOS threshold: ▼ Summer peak hour: LOS F operations ▼ Winter peak hour: LOS F operations Six of the study intersections would operate at unacceptable LOS F under cumulative conditions with the proposed project, either degrading from an acceptable level of service or substantially exacerbating already unacceptable operations.	Impact	Cumulative Mitigation Measure 10-8b: Pay Placer County fee for future roadway improvements, including the SR 267/I-80 EB Ramps intersection Implement Mitigation Measure 10-2. The Truckee TIF Program identifies the construction of a two-lane roundabout at this location. This improvement would reduce the traffic impact to a less-than-significant level during the winter peak hour under cumulative-plus-project conditions. Cumulative Mitigation Measure 10-8c: Pay Placer County fee for future roadway improvements, including the SR 267/Brockway Road/Soaring Way intersection Implement Mitigation Measure 10-2. The Truckee TIF Program identifies the construction of a roundabout or equivalent improvements at this intersection. The TIF Program also includes the widening of SR 267 on both sides of this intersection, which would essentially result in a two-lane roundabout at this intersection. This improvement would reduce the traffic impact to a less-than-significant level during the summer and winter peak hour under cumulative-plus-project conditions. Cumulative Mitigation Measure 10-8d: Pay Placer County fee for future roadway improvements, including the SR 267/Schaffer Mill Road/Truckee Airport Road intersection Implement Mitigation Measure 10-2. The Placer County CIP identifies improvements to this intersection as well as the widening of SR 267 to four lanes on both sides of this intersection. The widening of this intersection with either signalization or the construction of a two-lane roundabout would reduce the traffic impact to a less-than-significant level during the summer and winter peak hours under cumulative-plus-project conditions. Cumulative Mitigation Measure 10-8e: Provide signage on Highlands View Road and pay Placer County fee for future roadway improvements Implement Mitigation Measures 10-1c and 10-2. The Placer County CIP includes the widening of SR 267 to four lanes on both sides of this intersection. The widening of this intersection, along with the project-specific mitigation of providing signage on Highlands View Road for motorists to access SR 267 northbound via Ridgeline Drive and Northstar Drive, would reduce the impact to a less-than-significant level during the summer and winter peak hours under cumulative-plus-project conditions. Cumulative Mitigation Measure 10-8f: Pay Placer County fee for future roadway improvements, including the SR 267/Project Access Road intersection Implement Mitigation Measure 10-2. The Placer County CIP includes the widening of SR	

NI = No impact, LTS = Less than significant, PS = Potentially significant, S = Significant, SU = Significant and unavoidable

2-42 Placer County Martis Valley West Project Specific Plan Draft EIR

PF19-4

Level Service of F is clearly identified in the mitigation above and violates MVCP policy 5.A.8 and 5.A.10 (full text of policies below)

The FEIR response does not recognize that just because the impact is significant and unavoidable doesn't mean it doesn't violate the MVCP policy 5.A.8 The County's LOS standard for State Route 267 shall be no worse than E. **The Commission must DENY the MVWPSP as proposed as it violates the MVCP. Paying mitigation fees do not remove the Level of Service F problem. Furthermore, Placer County has not provided adequate transportation systems (future plans?) that will get folks out of their cars. The proposed MVWPSP relies on a Significant and Unavoidable impact tactic and does meet the MVCP policy as Placer County has not achieved a balanced transportation system.**
5.A.10 The County shall strive to meet the level of service standards through a balanced transportation system that provides alternatives to the automobile.

Table 2-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		267 to four lanes on both sides of this intersection. Although the widening of this intersection plus the installation of a traffic signal or two-lane roundabout would result in acceptable levels of service, Caltrans would not support either signalization or a roundabout because of the steep grade of SR 267 (over 4 percent) at this location and the resulting potential of rear-end collisions, especially in snowy conditions (Blake, pers. comm., 2015). Therefore, LOS F conditions would remain at this intersection during both the summer and winter peak hours.	
Cumulative Impact 10-9: Cumulative impacts to roadway segments The proposed project would exacerbate already unacceptable operations, as shown in Table 10-19 and described below. Although widening of SR 267 from two to four lanes from Brockway Road to the Town of Truckee/Placer County line is included in the Town of Truckee TIF Program, and from the County line to Brockway Summit in the Placer County CIP, SR 267 was assumed to remain two lanes under cumulative conditions for reasons described above. As a two-lane highway, SR 267 would operate at unacceptable levels of service on five of the seven study segments during the summer peak hour without the proposed project, and all seven segments would operate at unacceptable levels of service during the winter peak hour without the proposed project. For the two SR 267 segments located in the Town of Truckee, the project would result in a significant impact on the segment from Brockway Road to the Town of Truckee/Placer County line during the winter peak, as the project would increase the V/C ratio by 0.05 (an increase by 0.05 or more is considered significant). For the five SR 267 roadway segments located in Placer County, the project would result in a significant impact at all five segments during both the summer and winter peak hours, in all cases because it would result in an increase in V/C ratio of 0.05 or greater than segments projected to operate unacceptably without the project.	Would result in a considerable contribution to the cumulative impact	Cumulative Mitigation Measure 10-9: Pay Placer County fee for future roadway improvements. Implement Mitigation Measure 10-3. The widening of SR 267 to four lanes from Brockway Road to Brockway Summit would result in LOS D or better traffic operations on the study segments from Brockway Road to the Project Access Roadway during the summer and winter peak hours. As previously discussed, the widening of SR 267 to four lanes from Brockway Road to Brockway Summit is identified in both the Town of Truckee TIF Program and the Placer County CIP. The project would pay traffic impact fees that could be used for those portions of SR 267 located within Placer County. The Placer County CIP does not include widening of SR 267 from Brockway Summit to SR 28; therefore, there would be no feasible mitigation for the significant impact of the project on the roadway segment from the Project Access Roadway to SR 28.	SU
Cumulative Impact 10-10: Cumulative impacts to freeway facilities As shown in Table 10-20, the study freeway facilities are expected to operate at acceptable levels of service under cumulative conditions. The addition of project generated traffic to the cumulative no project conditions freeway on- and off-ramps at the SR 267/I-80 interchange would not degrade operations to unacceptable levels during the summer and winter peak hours.	Would not result in a considerable contribution to the cumulative	No mitigation is required.	LTS

NI = No Impact, LTS = Less than significant, PS = Potentially significant, S = Significant, SU = Significant and unavoidable

Placer County
Martis Valley West Project Specific Plan Draft EIR 2-40

PF19-4

FEIR Response

Response to Comments
Comments and Responses

I051-54 The comment suggests that the project would violate MVCP policy 5.A.8. As noted in Appendix D of the Draft EIR, SR 267 is a Caltrans facility; therefore, the EIR analysis of impacts to SR 267 was based on the Caltrans LOS standards. In the five SR 267 segments studied between the Town of Truckee/Placer County Line and SR 28, the MVWPSP would worsen traffic conditions, resulting in a segment either degrading from LOS D to LOS E, or exacerbating conditions on a segment operating at LOS E by an increase in V/C ratio of 0.05 or more, for both the summer and winter peak hours. As shown in Table 10-13 of the Draft EIR, the SR 267 segments would operate at LOS D or E under existing plus project conditions. Furthermore, prior to issuance of any building permits, the project shall be subject to the payment of traffic impact fees in effect for the Tahoe District, pursuant to applicable ordinances and resolutions, to the Placer Countywide Traffic Fee Program for its fair share of identified capital improvements.

The DEIR stated several road segments would be Level of Service F (see pages above) while the FEIR response above ignores the impacts and hides behind significant and unavoidable as acceptable

Corridor Connection Open Houses Is Transportation Going in the Right Direction?
May 17 at the North Tahoe Events Center in Kings Beach, and Tuesday, May 24, 2016

Lake Tahoe's two regional bi-state agencies for transportation, the Tahoe Regional Planning Agency (TRPA) and Tahoe Transportation District (TTD), are inviting the public to attend interactive open houses this month to learn more about draft proposals to improve Tahoe's highway corridors and share their ideas and input.

"Protecting Tahoe's beauty while accommodating all who enjoy it is a true balancing act. Projections show the number of annual visits increasing by up to 20% in the next 20 years. What will the impacts be on air/water quality and transportation? Share your input on potential solutions for connecting Tahoe's transportation corridors and improving access for residents and visitors." PF19-4

Recent transportation meetings held by the TRPA predict even more traffic in the Tahoe Basin as stated above. The Martis Valley West Parcel Project (outside the basin) will contribute impacts to inside the basin and must be analyzed and project reduction seriously considered

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE (CHAPTER 12)
6. Impact 12-2: Operational greenhouse gas emissions
Any development on the east or west parcel threatens the exceedance of the Tahoe Basin maximum Vehicle Miles Traveled threshold along with the recently updated (2012) Tahoe Basin Regional Plan Goals and Policies and updated Code of Ordinances to concentrate development in Town Centers.
The Alt 1. No Project achieves this objective

7. Cumulative Impact 12-4: Cumulative greenhouse gas emissions
Any development on the east or west parcel threatens the exceedance of the Tahoe Basin maximum Vehicle Miles Traveled threshold along with the recently updated (2012) Tahoe Basin Regional Plan Goals and Policies and updated Code of Ordinances to concentrate development in Town Centers.
The Alt 1. No Project achieves this objective

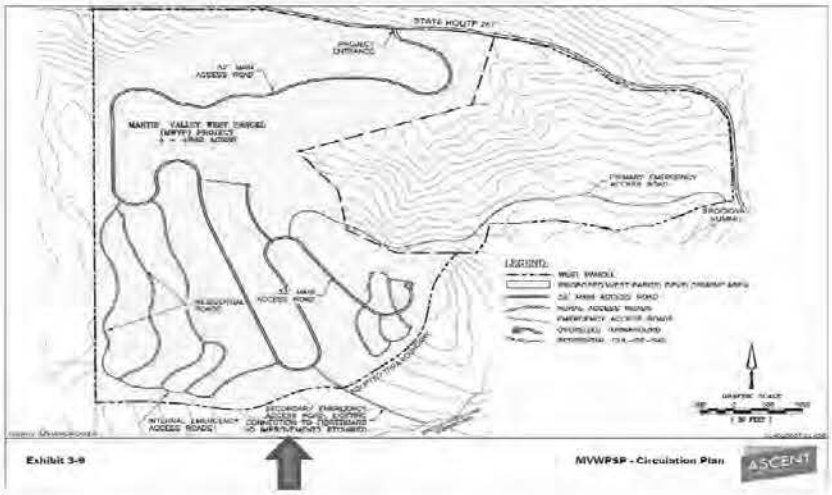
Page 5 of the Executive Summary in the DEIR does not list Impact 12-4 as significant and unavoidable but Page 53 does as does the staff report. The EIR documentation must be consistent.

You as a commission must ask yourselves: How many Significant and Unavoidable impacts are allowed before a project is just not practical and should be DENIED?

IV. EVACUATION: PROPOSED SECONDARY EMERGENCY VEHICLE ACCESS ROAD CRITERIA

Exhibit 3-9 states No improvements to logging road connecting to Fiberboard Freeway is required. Section 503 Fire Apparatus Access Roads states otherwise. As do comments from North Tahoe Fire District, PRC 4290 and Placer Code 15.04.710 Fire Code amended.

PF19-5



The FEIR completely failed to adhere to Fire Code, related Placer County code, etc. as provided below. The FEIR states an existing dirt road is sufficient and no improvements are necessary. You must DENY the FEIR and request re-circulation of EIR to address the inadequate secondary EVA road proposed based on code requirements. With the road improvement requirements the impacts (road construction, traffic from construction, etc.) to the Tahoe basin onto the Fiberboard Freeway (which is clearly identified in several maps in the DEIR and FEIR) must be completed.

SECTION 503 FIRE APPARATUS ACCESS ROADS

503.1 Where required. Fire apparatus access roads shall be provided and maintained in accordance with Sections 503.1.1 through 503.1.3.

> **503.1.1 Buildings and facilities.** *Approved* fire apparatus access roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an *approved* route around the exterior of the building or facility.
>
> **Exception:** The *fire code official* is authorized to increase the dimension of 150 feet (45 720 mm) where:
>
> 1. The building is equipped throughout with an *approved automatic sprinkler system* installed in accordance with Section 903.3.1.1, 903.3.1.2 or 903.3.1.3.
>
> 2. Fire apparatus access roads cannot be installed because of location on property, topography, waterways, nonnegotiable grades or other similar conditions, and an*approved* alternative means of fire protection is provided.
>
> 3. There are not more than two Group R-3 or Group U occupancies.

503.1.2 Additional access. The *fire code official* is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access.

503.1.3 High-piled storage. Fire department vehicle access to buildings used for *high-piled combustible storage* shall comply with the applicable provisions ofChapter 23.

503.2 Specifications. Fire apparatus access roads shall be installed and arranged in accordance with Sections 503.2.1 through 503.2.8. PF19-5

[California Code of Regulations, Title 19, Division 1, §3.05(a)] Fire Department Access and Egress. (Roads)

(a) Roads. Required access roads from every building to a public street shall be all-weather hard-surfaced (suitable for use by fire apparatus) right-of-way not less than 20 feet (6096 mm) in width. Such right-of-way shall be unobstructed and maintained only as access to the public street.

***Exception:** The enforcing agency may waive or modify this requirement if in his opinion such all-weather hard-surfaced condition is not necessary in the interest of public safety and welfare.*

503.2.1 Dimensions. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, except for *approved* security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115 mm).

503.2.2 Authority. The *fire code official* shall have the authority to require an increase in the minimum access widths where they are inadequate for fire or rescue operations.

503.2.3 Surface. Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all-weather driving capabilities.

503.2.4 Turning radius. The required turning radius of a fire apparatus access road shall be determined by the *fire code official.*

503.2.5 Dead ends. Dead-end fire apparatus access roads in excess of 150 feet (45 720 mm) in length shall be provided with an *approved* area for turning around fire apparatus.

503.2.6 Bridges and elevated surfaces. Where a bridge or an elevated surface is part of a fire apparatus access road, the bridge shall be constructed and maintained in accordance with AASHTO HB-17. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the *fire code official.* Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, *approved* barriers, *approved* signs or both shall be installed and maintained when required by the *fire code official.*

503.2.7 Grade. The grade of the fire apparatus access road shall be within the limits established by the *fire code official* based on the fire department's apparatus.

503.2.8 Angles of approach and departure. The angles of approach and departure for fire apparatus access roads shall be within the limits established by the *fire code official* based on the fire department's apparatus.

503.3 Marking. Where required by the *fire code official, approved* signs or other *approved* notices or markings that include the words NO PARKING—FIRE LANE shall be provided for fire apparatus access roads to identify such roads or prohibit the obstruction thereof. The means by which *fire lanes* are designated shall be maintained in a clean and legible condition at all times and be replaced or repaired when necessary to provide adequate visibility.

503.4 Obstruction of fire apparatus access roads. Fire apparatus access roads shall not be obstructed in any manner, including the parking of vehicles. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times.

503.5 Required gates or barricades. The *fire code official* is authorized to require the installation and maintenance of gates or other *approved* barricades across fire apparatus

PF19-5

access roads, trails or other access ways, not including public streets, alleys or highways. Electric gate operators, where provided, shall be *listed* in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F 2200.

> **503.5.1 Secured gates and barricades.** When required, gates and barricades shall be secured in an *approved* manner. Roads, trails and other access ways that have been closed and obstructed in the manner prescribed by Section 503.5 shall not be trespassed on or used unless authorized by the *owner* and the *fire code official.*

503.6 Security gates. The installation of security gates across a fire apparatus access road shall be *approved* by the fire chief. Where security gates are installed, they shall have an *approved* means of emergency operation. The security gates and the emergency operation shall be maintained operational at all times. Electric gate operators, where provided, shall be *listed* in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F 2200.

The FEIR included Martis Valley West Parcel Specific Plan **Emergency Preparedness and Evacuation Plan** ---Draft--- Prepared for Placer County Prepared by Mountainside Partners May 2016
But ignores its mandatory language. See code below

3.1.4 Placer County Fire Code
Placer County has adopted the 2013 California Building Code, Title 24 of the California Code of Regulations, and the 2013 Fire Code (Sections 15.04.700 and **15.04.710 Fire Code Amendment**). The Fire Code addresses emergency access, access gates, sprinkler systems, fire alarms within buildings, and construction of **access roads to accommodate fire apparatus**. The Fire Code requires that an automatic fire sprinklers and/or fire extinguishing system be installed throughout new one- and two-family
dwellings and commercial buildings 3,600 square feet and larger.

PF19-6

Placer County Code: 15.04.710 Fire Code amended. For reference

The California Fire Code adopted in Section 15.04.700 is modified, amended and/or supplemented as follows:

A. 1. The California Fire Code (CFC) as adopted above with approved amendments and appendix chapters, and all State Fire Marshal codes delegated to local agencies, are to be enforced by the chief of each fire district, CSA, or as designated by contract. In the absence of the above, the Placer County fire warden shall act as the county fire marshal. Where provisions in the CFC conflict with other statutes/regulations or county ordinances, including, but not limited to, the Placer County Land Development Manual, the most restrictive shall govern.

2. Pursuant to State Health and Safety Code Section 13869.7, all fire district amendments to the CFC will be valid after such amendments are first authorized by the fire district board and then approved by the board of supervisors.

B. Section 103.1, Department of Fire Prevention - General, is amended by replacing the first paragraph with the following:

The Chief of a fire department/district, with the written approval of the Board of Directors of the particular fire department is authorized to make and enforce such rules and regulations for the prevention and control of fires and fire hazards as may be necessary from time to time to carry out the intent of this Code. Three certified copies of such rules and regulations shall be filed with the Clerk of the jurisdiction and shall be in effect immediately thereafter. Pursuant to State

Health and Safety Code Section 13869.7, rules and regulations that involve building standards will be valid when approved by the Board of Supervisors.

C.Section 108, Board of Appeals, is amended by replacing the first paragraph with the following:

In order to determine the suitability of alternate materials and type of construction and to provide for reasonable interpretation of the provisions of this code, there is hereby appointed a board of appeals consisting of the board of directors of each fire protection district for matters within their jurisdiction and the Placer County Building Board of Appeals in the remaining areas of the County. The Chief shall be an ex-officio member of the Board and shall act as secretary to the Board. The Board shall adopt reasonable rules and regulations for conducting its investigations and shall render all decisions and findings in writing to the chief with a duplicate copy to the appellant and may recommend to the Executive Body such new legislation as is consistent therewith. PF19-6

D.Chapter 1 Section 109.3, Notice of Violation, is amended by adding the following:

The Chief of any fire department/district within the County or his/her authorized representatives shall have authority to enforce this code and issue citations for violations in their respective jurisdiction.

E Section 202, Definitions. Add the following:

Fire Hydrant: shall mean a hydrant supplied by a 6-inch or larger branch line, one or more pumper connection (4 1/2 inch) and 2 or more 2 1/2 inch outlets, capable of supplying required fire flow for at least 2 hours.

Section 502 Definitions. Add the following:

Emergency Vehicle Access and occupant emergency egress/evacuation roads: Use - Access for emergency vehicles during an emergency. Emergency egress/evacuation for residents during an emergency. Size - Roadways shall meet the requirements of the local authority having jurisdiction but shall not be less than the requirements set in PRC 4290 and Placer County Code.

O.Appendix D, Fire Apparatus Access Roads is adopted and amended as follows:

D102.1 amended to read:

Facilities, buildings or portions of buildings hereafter constructed shall be accessible to fire department apparatus by way of an approved fire apparatus access road with an asphalt, concrete, or other approved driving surface capable of supporting the imposed load of fire apparatus as determined by the fire authority having jurisdiction but no less than 40,000 pounds.

Additional code reference: Title 14, California Code of Regulations, Section 1270, et seq.: Structural Fire Prevention Field Guide
http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fppquidepdf83.pdf
Article 2. Road Standards for Fire Equipment Access
8.4
Infrastructure
8.4a
Access
Access is a major fire prevention and protection need, whether wildland or structural. Failure to provide reasonable access for emergency equipment and evacuation exits for civilians can result in major loss of life, property and natural resources. Fire apparatus sitting at an intersection, waiting for civilians to exit on

a narrow road, cannot provide the necessary fire suppression action. Safe access requires street and road networks that limit dead-end roads and provide reasonable widths, grades and curves on all roads and driveways.
Road networks should provide unobstructed traffic circulation during a wildfire emergency. CDF recommends two separate points of ingress/egress to each development. Alternate routes of escape that will safely handle evacuations and emergency equipment should be established. Road and street systems should provide maximum circulation consistent with topography to meet fire safety needs. The following standards are recommended for subdivisions:

PF19-6

Access Routes
- PRC 4290 requires at least two different public ingress/egress routes on all roads.
Road Width
- All roads shall be constructed to provide a minimum of two nine-foot traffic lanes providing two-way traffic flow. Additional requirements shall be mandated by local jurisdictions.

Roadway Surface
- The surface shall provide unobstructed access to conventional drive vehicles, including sedans and fire engines. **Surfaces should be established in conformance with local ordinances and be capable of supporting a minimum 40,000-pound load**.

Roadway Grades
- The grade for all roads, streets, private lanes and driveways shall not exceed 16 percent.

Roadway Radius
- No roadway shall have a horizontal inside radius curvature of less than 50 feet.
Additional surface width of 4 feet shall be added to curves of 50-100 feet radius--2 feet to those from 100-200 feet. The length of vertical curves in roadways, exclusive of gutters, ditches and drainage structures designed to hold or divert water, shall not be less than 100 feet

PRC 4290. The regulations shall include all of the following:
(1) Road standards for fire equipment access.
(2) Standards for signs identifying streets, roads, and buildings.
(3) Minimum private water supply reserves for emergency fire use.
(4) Fuel breaks and greenbelts.
(b) These regulations do not supersede local regulations which equal or exceed minimum regulations adopted by the state.

North Tahoe Fire District EIR comments stated the access requirements and capacity of SR 267 are already unacceptable. Also secondary Emergency Vehicle Access (EVA) issues related to Fiberboard Freeway access and use needs to be addressed through the development of a **fully paved access road**. The FEIR comments were vague and dismissive. Project specific effects have not been adequately analyzed. **The FEIR must be DENIED as proposed and re-circulated to include the appropriate requirements be mandatory as stated by fire code and fire experts. Inadequate mitigation and lack of public safety responsibility is non-existent when addressing the secondary EVA.**

V. WORKFORCE HOUSING REQUIREMENT

The MVWPSP has been revised to provide for workforce housing on the project site rather than payment of an in-lieu fee. Consistent with Placer County General Plan Policy C-2, a dedication of land to Placer County within the MVWP site is proposed. The proposed employee housing site is located within the developable portion of the plan area, adjacent to the proposed transit shelter (see Exhibit F2-1 on the following page). This dedication of land is intended to provide workforce housing at important milestones as well as to allow Placer County to adapt to regional needs over the course of time. The dedication of land would meet the requirements of Policy C-2. At the May 2016 NTRAC meeting the applicant answered that land would be set aside but they would not be developing the workforce housing. The dedicated lands would be restricted to workforce housing development. The employee housing site could contain up to 21 units. Those units would be subtracted from the total proposed unit count of 760 for the proposed development; therefore, the total number of units allowed within the project site would not exceed 760. As discussed briefly below, the impacts of the proposed housing land dedication have been fully analyzed in this Draft EIR (because the total unit count and disturbed acreage would not change), and the conclusions of the EIR have not changed. As discussed above, the provision of workforce housing on the project site would be consistent with Placer County Gereral Plan Housing Policy C-2, which requires that each project provide housing or an in-lieu fee to support housing for half its total FTE employees. Impact 6-3, Provision of Employee Housing, would remain less than significant. PF19-7 Applicant

At the May 2016 North Tahoe Advisory Council meeting the applicant admitted they were only setting the land aside and not building the actual workforce housing. The FEIR stated one option of 6.9 acres of project site land to be dedicated while the staff report changed to in-lieu fee. The MVCP requirement is unmet for affordable housing as well as the Placer General Placer provision not being met. This is an unacceptable method to avoid building much need affordable/workforce housing.

Page 11 MVCP **E. MAJOR PLAN AREA FINDINGS LAND USE**
Environmental constraints, market and economic conditions, population demographics, and the interest of numerous parties define existing land use conditions in Martis Valley. In addition, the presence of the Truckee-Tahoe Airport, Martis Reservoir, the Martis Creek National Recreation Area, and the U.S. Forest Service require that land use issues and considerations in Martis Valley involve a number of local, state, and federal agencies.
The 1975 Martis Valley General Plan and the 1994 Placer County General Plan anticipated the build out population of Martis Valley between 22,000 and 25,262 residents, with a potential development capacity between 8,627 primary dwelling units and 17,100 dwelling units of all types. However, development in Martis Valley has not occurred in a manner or at an intensity consistent with these projections. Instead, restrictions on development in the Lake Tahoe Basin and the recreational needs of weekend populations have led to the development of secondary homes in recreation-based communities, and little housing for permanent residents and a lower than expected overall population.

HOUSING
Housing and development restrictions within the Lake Tahoe Basin as well as area housing costs have created an affordable housing shortage within the area. Restrictions within the Lake Tahoe Basin were established to manage the land use and resources of the Lake Tahoe region, based upon environmental protection and the encouragement of recreation-oriented land uses. Development restrictions within the Tahoe Basin have caused surrounding areas to absorb increased growth pressures. Housing projects in the area tend to be second home in nature (i.e., seasonal use) and are generally not considered affordable. Private landowners generally do not propose affordable housing developments because of the high land values and the recreational oriented land use of the area. Similar to other areas in the region, the recent developments within Martis Valley cater to a second home or recreational home market. These projects are not designed to meet permanent housing needs. The developments have responded to a market for relatively expensive second homes with access to seasonal recreational facilities and activities that are oriented toward winter or summer. Martis Valley developments have generally been designed for more affluent individuals and families, not for low and middle-income families. The projects create a need for affordable housing that is not being met within the developments. Most of the jobs created by the vacation and resort industry are seasonal and/or relatively low paying hourly positions that do not provide sufficient income to rent or purchase housing in the area.

The FEIR response (below) like other projects have been approved and then asked that the affordable component be changed as evidenced by the Resort at Squaw Creek requesting to pay in-lieu fees instead of building workforce housing

(which was approved in EIR) and the recently approved Mitigated Negative Dclaration for the Tahoe Expeditionary Academy location being allowed where workforce housing was slated. Now Martis Fund will pay in-lieu fees and give some funding for another future location yet to be identifed. The Railyard project in Truckee is providing an affordable component so the Martis Valley must identify a location within the Martis Valley not Truckee, not Glenshire and not Tahoe Basin. How many suitable locations remain in the Martis Valley for much needed affordable housing? If you add up the number of units a large parcel needs to be purchased by Placer County accorsing to how the in-lieu fees have been put into a general fund type mitigation fund with no current accountibily identifed as to how much actually exists in that in-lieu fund and how much will cost to actually build the affordable units.

When will this stop and actual housing be built? This project must not just identify lands but build the actual units. The EIR states that 50% of the affordable requirement must be part of the project. PF19-7

Below: From Staff Report, released June 2, 2016 referencing Development Agreement also released June 2, 2016. It is impossible to read and comment on all the dcoumentation released (FEIR May 7, 2016, 340 pg staff report, Development Agreement, Specific Plan Developmen Standards, etc.

Workforce / Employee Housing Component
The applicant originally proposed to pay an in-lieu fee to satisfy the Affordable / Workforce Housing component. The payment of an in-lieu fee was analyzed in the Draft EIR. Subsequent to the release of the DEIR, the applicants revised their employee housing proposal and proposed the dedication of 6.9 acres of land at the entrance to the project site for the construction of 22 employee/workforce housing units. The analysis of the dedication of land was then introduced in the Final EIR. Through Development Agreement discussions with the applicant and staff, two options are now proposed. This is discussed in further detail within the *Development Agreement* section of this staff report.

Employee Housing Proposal:
The Project is expected to generate between 66.58 and 122.68 new full-time equivalent (FTE) employees. Consistent with Placer County General Plan Housing Policy C-2, the Developer must provide housing for half of the total FTE (between 33.29 and 61.34 employees). The General Plan Housing Policy C-2 allows for the workforce housing obligations to be met by construction of units onsite, construction of units offsite, dedication of land and / or payment of an in-lieu fee.

To satisfy the workforce housing obligation, construction of units offsite was not considered as part of this proposal as an offsite location was never identified nor analyzed. Initally, the developer proposed to pay an in-lieu fee to Placer County to meet their employee housing obligation. As proposed, the in-lieu fees would be applied to a Placer County controlled trust that funds workforce housing mortgage or rental subsidy programs in Martis Valley, and would be disbursed at Placer County's discretion. While payment of an in-lieu fee is an option to satisfy ones workforce housing obligation, there is no adopted Placer County workforce housing mortgage or rental subsidy program, consequently the developer withdrew its proposal.

The Developer subsequently proposed to dedicate a ±6.9 acre site near the entrance of the development, stub backbone infrastructure to the site concurrent with the construction of the proposed project's backbone infrastructure (Phase 0) and allocate 21 units out of its 760 residential unit capacity in the proposed specific to this site. Dedication of land is an option to consider to satisfy the workforce housing obligation. 21 units is projected to fully satisfy the workforce housing obligation, assuming a blended average of 2-bedroom units, however the proposal shifts the ultimate burden for construction
Page 42

c:\plus\pln\pcc comm\S-F MVWPSP FINAL FC Staff Report 06-9-16 pch 2.docx

and construction financing of the units to the County. In order for County staff to consider a land dedication option, staff weighed whether or not the site could qualify for outside funding sources such as tax credits that are needed to support construction costs. Ideally a site would need to be near transit, neighborhood services such as grocery stores, and near public services. If tax credits cannot be obtained, the County would need to seek other outside funding sources or finance the construction costs itself. Therefore, CDRA staff rejected the land dedication site as CDRA staff felt the site would not compete well for tax credits. The ability to obtain tax credit financing is critical for the County to assume the obligation to construct units on that site

Staff countered with the developer to assume the responsibility to construct workforce housing units onsite. Construction of units onsite is also an option under Housing Policy C-2. Staff proposed construction of a minimum of 21 units to meet the full time employee equivalent (FTEE) obligation of 61. The FTEE per unit constructed is calculated as follows: Studio Unit = 2 FTEE, 1-bedroom unit = 2 FTEE, 2-bedroom unit = 3 FTEE, and 3-bedroom unit = 4 FTEE. A minimum of 50% of the units (10) will be constructed prior to the recordation of the Final Subdivision map that creates the 246th lot. Developer would be required to construct onsite the remaining 50% of the employee housing units (11) prior to the recordation of the Final Subdivision Map that creates the 492nd lot. The units could be rental and/or ownership units as later outlined in detail in the developer's Housing Mitigation Plan. Staff also proposed that employee housing units be provided for household incomes within 60-140% of Area Median Income (AMI), with a mix of studio, one, two, or three bedroom units. The developer indicated it did not support this option citing concerns with the financial feasibility of the development with this full burden, and difficulty with insurance provisions on the likely product type, condominiums. Staff indicated that it could consider an alternative solution, but would keep as an option construction of units on-site. PF19-7

Another example of this documentation needed more time red arrow typo lactation should be location. Also the FEIR provided maps for the 6.9 acres the in-lieu fee was not discussed in FEIR- New info introduced

CDRA staff entered into negotiations with the developer for an in-lieu fee option so long as the fee was sufficient in size to help finance the construction of workforce housing in an appropriate lactation that would leverage other outside funding sources including tax credits to complete a workforce housing project. This option would shift the ultimate burden for construction of the units to the County, however, with a large enough sum of cash, would allow the County to choose a site better suited for leveraging outside funding sources and mitigating burdens on the County to finance the construction of a project. County staff has experience leading projects such as the Domus affordable housing project in Kings Beach and the Quartz Ridge affordable housing project in the Auburn-Bowman area, working with affordable housing developers to successfully prepare financing packages to qualify for tax credits.

Staff negotiated with the developer to pay the County a fee of $2,450,000 in increments as described below:

a. $1,837,500 payable to the County prior to the recordation of the first small lot final map; and;
b. $612,500 payable to the County prior to the recordation of the small lot final map that creates the 460th lot or unit.

Staff reviewed the Town of Truckee's in-lieu fee as well as other metrics including amounts that would be needed to subsidize rents to an affordable level to arrive at a negotiated fee amount. Staff was supportive of the amount as it was an amount such that 75% would be payable early on in the project, prior to the recordation of the first small to subdivision map, regardless of the amount of units proposed for construction to allow the County to seek other more appropriate opportunities to leverage funds to construct units.

While CDRA staff is working through options for an in-lieu fee ordinance, there currently does not exist an ordinance providing specific parameters for an in-lieu fee and guidelines for a developer to meet its workforce housing obligations. Staff proposed options to allow the developer to meets its workforce housing obligation in conformance with Housing Element Policy C-2 including construction units on site or payment of a fee sufficient enough for the County to take on the obligation to construct the units to allow for flexibility to meet the workforce housing obligations.

In addition to the above options to satisfy Developer's workforce housing obligation, the Developer agreed to also provide the County with a one-time payment of $125,000 toward regional employee housing initiatives as determined by the County for the Tahoe-Sierra Region. The Regional Employee Housing Contribution shall be paid in full prior to the approval of the improvement plans for Phase 0. If the County has not received the Regional Employee Housing Contribution within five (5) years from the Effective Date of this Agreement, then the amount due and payable to the County for the Regional Employee Housing Contribution will increase to $175,000 payable in full prior to the approval of the improvements plans for Phase 0. This Regional Employee Housing Contribution will support critical regional efforts to support the enhanced supply of workforce housing and is above and beyond requirements to meet workforce housing contributions described above. PF19-7

DEIR: Impact 6-3: Provision of employee housing The FEIR removed this and Staff Report dated June 2 added this option again (above)

The project is expected to generate between 66.58 and 122.68 new full-time equivalent (FTE) employees. Consistent with Placer County General Plan Housing Policy C-2, the project must provide housing or an in-lieu fee to support housing for half the total FTE (between 33.29 and 61.34). MVWPSP Policies LU-HS1 through LU-HS5 require the project to comply with this requirement, which is anticipated to be met by payment of the in-lieu fee. Because the employee housing requirement would be met by a County-approved method, this impact would be less than significant.

As presented in Table 6-5, the proposed MVWPSP is expected to generate an annual average of between 66.58 and 122.68 new FTE employees. The Placer County General Plan requires that new development in the Sierra Nevada provide housing for a minimum of 50 percent of the FTE employees generated by a development project. Therefore, the project would be required to provide housing for between 33.29 and 61.34 new FTE employees.

The EIR states a minimum of 33 units. A unit definition should be for one person. The FEIR proposes 6.9 acres to be set aside for future housing of 21 units.

Simple math 33+61= 94/2 = 47 units necessary to meet the 50% requirement. Land dedication isn't fully mitigating the need to build the units. Two and three bedroom units are less desirable and more expensive

Simply throwing $$$$ into an in-lieu fund in hopes enough will fill the coffer is absurd.

VI Development Agreement, Development Standards, Approvals

17.60.060 Development review committee.

A. Appointment and Duties. A development review committee (DRC) is established to perform the following duties:

1. To review all administrative review, minor and conditional use permit, variance, rezoning, zoning ordinance amendment applications, specific plans, general plan amendments, and development agreements as a staff project review group to advise the planning director, zoning administrator, planning commission and board of supervisors on such applications. PF19-8

C. Decisions of the Committee. Decisions by the development review committee (DRC) on the recommendations it forwards to the zoning administrator, the planning commission and/or the board of supervisors shall be unanimous to enable a recommendation for approval of the application. Where one member of the DRC opposes a recommendation for approval of an application, the recommendation of the committee shall be for denial of the application.(See Section 17.58.070 (Staff report and recommendations) for requirements regarding report content and reasoning for recommendation.) (Ord. 5373-B, 2005; Ord. 5126-B, 2001)

When did the Development Review Committee meet and determine the recommendation to approve the 9 items listed in Staff reports being recommended? The public/agencies were not provided meeting minutes showing the vote as unanimous as required by code.

The Development Standards reference the Lake Tahoe region as being part of the property. The EIR profusely states this project is not within the Tahoe basin or affects the Tahoe region. Clearly this is misleading as cumulative traffic impacts alone cannot be ignored.Furthermore, the narrative is misleading by stating that care is being taken with tree location to allow visual balance. Defensible space is not accoutned for in the EIR tree removal analysis, infrastruture location, and road networks will remove more trees than the mitigation and narrative states. That coupled with buildings atop a ridge at heights up to 75 feet that share a boundary line with the Tahoe Basin at a 7,000+ elevation is a recipe for scenic violation of the Tahoe basin

Page B 2 Specific Plan May 2016

Development Standards PF19-9

1. Design Concept & Guiding Principles

a. Relationship to Natural Setting

MVWPSP property is located within Martis Valley and the Lake Tahoe region - a place of extreme natural beauty, rich history, and spectacular recreation. The primary objective of all architectural design, site planning and landscaping is to preserve this unique identity, build in harmony with the rugged natural beauty intrinsic to this site and to provide recreational opportunities for visitors and residents.

The vision of MVWPSP is one of an active, year round, recreational community built with care and sensitivity through architecture and landscape that reflects Martis Valley's heritage and blends into, rather than dominates, its natural setting. The Specific Plan has carefully located the residences to rest lightly within the landscape, with higher density in clustered areas in order to preserve expansive open space and conservation areas. The Specific Plan defines development areas and conservation areas to minimize change to natural topography, landform and the outstanding natural landscape features in the region, views and view-sheds.

Proper design and siting of buildings on each site will include careful consideration of existing terrain and natural features of the site. Any proposed design shall take into account grade changes, locations of trees, boulders, and orientation of the proposed improvements to sun, wind, and views (Fig 1.a). The development standards and design guidelines include implementation of the following site planning objectives:

- retain existing trees and minimize site disturbance to allow the visual balance of landscape and architecture,
- provide transitional places that blur the line between indoor and outdoor spaces, and
- provide architectural expression with authentic use of natural material and building form as suitable for the topography and natural setting.

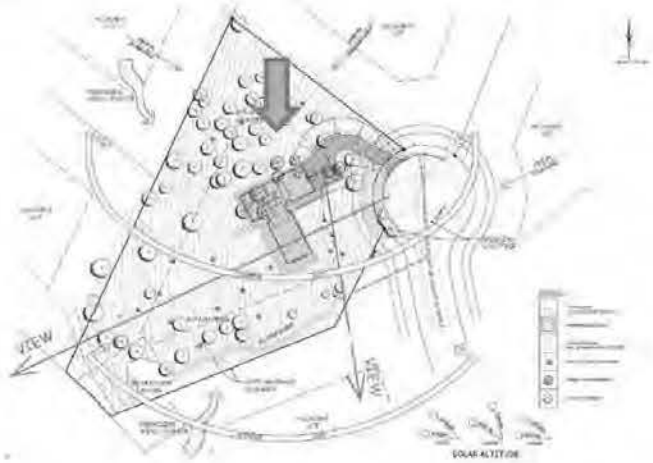


Fig 1.a

Figure 1.a is an example of proper design and siting of a building based on numerous factors and careful consideration.

B3

Clearly the trees do not reflect the proper defensible space requirements so the narrative must be revised to reflect the correct information PF19-9 cont.

Page B4 Specific Plan May 2016

b. Recreation Opportunities

The project will be designed to incorporate characteristics and density patterns that reflect North Tahoe Resort Communities. The project site is located adjacent to Northstar Resort and uphill from Northstar Village and Tahoe Vista. The North Tahoe Resort communities provide year-round recreational activities, including skiing, cross-country skiing, snowshoeing, snowboarding, hiking, and biking. The MVWPSP components complement and enhance the existing North Tahoe regional resorts by providing additional accommodations for residents and visitors to enjoy extensive cross-country trails, biking and hiking trails, recreational facilities and surrounding open space conservation areas. Figure(s) 1.b reflect sample of recreational trails. PF19-10

Another reference to North Lake Tahoe. The project is in the Martis Valley so the Specific Plan should retract all references to Tahoe. **This is not a sales brochure- or is it?** It's not Northstar at Tahoe, Martis Camp at Tahoe, Highlands at Tahoe, The Ritz at Lake Tahoe, etc. **The project is the Martis Valley outside the Tahoe Basin.**

Page B6 Specific Plan May 2016

Yet another reference to Tahoe

g. Community Character

An overriding objective with respect to the development of MVWPSP is to achieve a community that, in both form and character, is appropriate within the context of the Tahoe / High Sierra Mountain environment.

Planning and design of new residences shall emulate the best characteristics (e.g., form, scale, and general character) of existing, nearby neighborhoods and be architecturally and aesthetically consistent with the character of development that has occurred to date.

The request for no further amendment process is not acceptable. Discretionary approval and review by appropriate committee, commission, etc. and publically noticed must be a condition of proposed cahnges. Height is a good example when the MVCP will allow greater than 75 feet ie. Upto 115 feet.

3. Modifications PF19-11

The Development Standards and Design Guidelines may be modified as necessary pursuant to Government Code Section 65853 et seq. and Section 17.60.090 of the Placer County Zoning Ordinance. A concurrent Specific Plan Amendment shall not be required to revise the Development Standards and Design Guidelines provided the request satisfies all of the following:

- The revision to the Development Standards and Design Guidelines does not materially change a physical characteristic of the anticipated development.
- The objectives and intent of the Specific Plan are better served through the revision to the Development Standards and Design Guidelines.
- The revision to the Development Standards and Design Guidelines does not materially change the general land use pattern of the Plan Area.
- The revision to the Development Standards and Design Guidelines is consistent with the Specific Plan.
- No increase in the overall density will result through the revision to the Development Standards and Design Guidelines.

B9

Page B10 Specific Plan May 2016

4. Enforcement

The Development Standards and Design Guidelines shall be enforceable by the Planning Director or designee in a manner similar to other provisions contained in the Placer County Zoning Ordinance. Additionally, all project proposals will be reviewed by the Placer County Design/Site Review Committee. The Placer County Design/Site Review Committee shall make a finding of consistency among the development plan, the Specific Plan and the Development Standards and Design Guidelines.

5. MVWPSP Development Standards. Development Standards set forth in this section, section 5, shall supersede the relevant Placer County Zoning Ordinance.

a. Grading and Excavation
The following site and grading considerations shall be implemented:
- i. Buildings shall be sited to fit the natural terrain, minimize cuts/ fills, capture views and maximize winter sun exposure.
- ii. The total amount of impervious surface shall be reduced wherever feasible.
- iii. The area of soil and vegetation disturbance on each home site shall be limited to that required for necessary construction and landscaping purposes. Except where required by access, retaining walls, there shall be no disturbance in setbacks and areas to be left in a natural state.
- iv. Buildings, roads, and structures shall be sited in a manner that avoids landform modification to the greatest extent possible.
- v. Except where unavoidable, no excavation or fill shall occur within the drip line of trees to be retained.
- vi. The long axis of the building shall be oriented parallel to existing contours to the extent feasible.
- vii. Stepped foundations and fragmented roof forms shall be used to adapt to the existing site topography, rather than changing or flattening the slope.
- viii. Existing features such as rock outcroppings and trees shall be protected when feasible and integrated into the design of the home.

b. Setbacks and Buffers
The structural setbacks for a Planned Development for single family and townhome residences are as follows:
- i. Front (street) - 20 feet from the property line
- ii. Sides - 10 feet from the property line, unless townhome with common wall of 0'
- iii. Rear - 10 feet from the property line
- iv. Interior or common wall - (0) feet interior set-back
- v. 12.5 feet minimum setbacks shall be used on front, 10' side and rear of commercial and condominium buildings. If parking is proposed in the front of the building a 20 foot setback from the façade will be enacted to ensure safety.
- vi. In addition, buildings shall be setback far enough so that they do not encroach into the MPE of adjacent street(s).

PF19-11 cont.

Add a caveat (statement to # 5) that the MVWPSP Development Standards must exceed and be equally or more stringent than Placer County code to supersede the revelant Placer Code. 5a states captues views; captues what views? Add a statement that buildings will be sited and shall not violate Lake Tahoe viewshed in anyway.

Page B11 Specific Plan May 2016

The project buildings and roadways will be sited outside of environmentally sensitive lands. The majority of buildings will be sited outside of areas with slopes over 25%. The following Placer County General Plan land use buffer zone standards will be implemented:
- i. 100 foot buffer from designated Timberland areas
- ii. 100 foot buffer from Perennial Stream areas
- iii. 50 foot buffer from Riparian Vegetation areas

c. Building Heights
Maximum Building Heights, as calculated by Section 17.54.020 of the Placer County Zoning Ordinance and as set forth in Section 2.b. of this Specific Plan

Single Family Residences	42 feet
Townhomes	50 feet
Condominiums	75 feet
Commercial Buildings	60 feet
Buildings on the knoll - Figure 2	60 feet

d. Pitch
Major roofs shall have a minimum pitch of 3:12 and a maximum pitch of 14:12. Secondary roofs such as porches and dormers may have a lesser pitch. Medium roof pitches should be utilized where possible, in the range of 5:12, to hold snow. Roofs may be metal if they include snow clips or guards.

e. Off Street Parking
Paved parking areas shall be designed to provide the minimum amount of paving area necessary to meet required parking and circulation standards. Parking shall be designed to minimize visual and environmental impacts and allow for shared parking areas among different uses to help reduce the number of parking stalls. Underground parking, when feasible, is encouraged to maximize open space for commercial and condominium buildings. For residential units, adequate parking shall be provided off street with two (2) stalls per unit with one stall being covered. An additional two stalls per unit will be provided when possible for guest parking. Driveways shall have a minimum length of 20 feet when feasible as measured from the edge of pavement or back of curb (whichever is greater) to face of the garage door. Additionally, parking stalls will vary, on average 9' x 20', however some maybe smaller, i.e. compact or electric car stalls. Figure(s) 5.e illustrate acceptable parking standards.

PF19-12

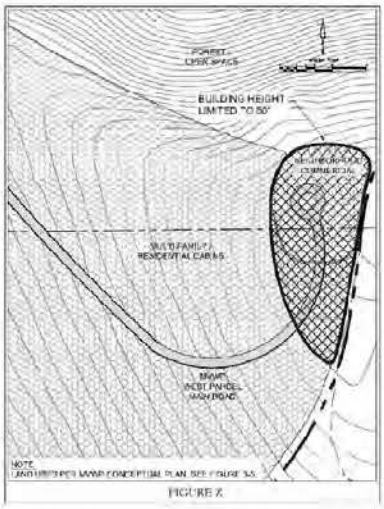


Figure Z

B23

Elevation of proposed commercial node is 7200-7400 ft. As previously mentioned it is necessary for all maps to include topo elevation numbers to accurate assess if viewshed of Lake Tahoe is violated. A proposed 60 foot building with no real requirement to amend the Specific Plan is unacceptable and must be changed in the FEIR and Specific Plan. See Page 9 of this document for a clearer representation of the commercial node. PF19-12 cont.

VII CLOSING COMMENTS

You as a commission must DENY and re-circulate the MVWPSP EIR for cause as in its current form is flawed and environmental analysis and response to comments are inadequate, dismissed or incomplete.

The FEIR violates Placer County Land Use Visual and Scenic Resources code 1.k.1.

Placer County Land Use code VISUAL AND SCENIC RESOURCES: 1.K.1. The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that: a. Avoids locating structures along ridgelines and steep slopes; b. Incorporates design and screening measures to minimize the visibility of structures and graded areas; c. Maintains the character and visual quality of the area. PF19-13

Removing the project from a ridgetop shared with Tahoe basin boundary ELIMINATES the Visual Significant and unavoidable Impact 9.9.

The over-riding consideration for biological migration is one-dimensional and is not enough benefit to the communities of Truckee, Martis and Tahoe to garner your support for the project without additional environmental analysis and mitigation. Logging practices and Timber Harvest already disturb the migration.

The approval process for the Martis Valley West parcel Specific Plan is being steamrolled for no apparent reason. Squaw Valley Village Specific Plan was released a mont earlier in April and is not scheduled for your review until end of June and Board of Supervisors in August. The MVWPSP was presented to NTRAC with 7 days to review and your commission with 7 days to review. What's the hurry?

The public was before you November 19, 2015 to provide public comment on the DEIR for Martis Valley West Parcel Specific Plan. 10 people spoke and no one was in favor of the project.

The MVOA is not an approved document- it's a business agreement that has fallen apart!

From the MVOA : G. SPI and the Land Trust Partners intend to enter into an agreement for the acquisition and ultimate open space conservation of the East Parcel as more specifically described in the East Parcel Purchase.

The communities of Truckee, Martis and North Lake Tahoe, at-large, were being held hostage! The MVOA makes demands and if not met would not preserve 6,000+ acres as a conservation easement unless granted development rights on the west parcel. The MVOA as stated above has fallen apart as the partners (Mountain Area Preservation and Sierra) do not agree with the project as proposed. The Land Trust partner only executes the conservation easement if the project is approved.

PF19-13 cont.

Exhibit C

East Parcel Purchase, Sale and Option Agreement Term Sheet

1. East Parcel Procurement
   - Acquisition of East Parcel.

2. East Parcel Deal Terms
   - Purchase price will be Fair Market Value as established by an agency approved appraisal.
   - Closing date.
   - Contingent upon the West Parcel's initial approval.
   - SPI will not pursue development entitlements on the East Parcel during the option term.
   - No clear cutting during option.
   - Length of Option Period.

3. East Parcel Scenarios
   - If the West Parcel does not receive initial approval. No deal on East Parcel acquisition and/or conservation easement.
   - If the West Parcel does not receive initial approval the MVCP's density allocation on the East Parcel remains.
   - If the West Parcel receives initial approval TPL and/or TDLT complete the East Parcel acquisition or conservation easement per their deal terms.
   - If the West Parcel receives initial approval and TPL and/or TDLT are unable to perform and complete the East Parcel acquisition:
     - SPI to retain ownership of the East Parcel and all associated land rights.
     - Density allocation on the East Parcel will be extinguished.
     - No residential or commercial development on the East Parcel.
     - SPI shall agree to place a limited conservation easement on the East Parcel.
     - In exchange for the East Parcel's limited conservation easement SPI shall be compensated per terms to be agreed upon with the West Parcel developer.

The Planning Commission MUST DENY the FEIR as proposed request re-circulation to correct inadequacies and provide additional analysis to insure DEIR conclusions.

VIII. Articles from members of the public and environmental groups

Several articles (a sampling from 2014-2106 below) have been in the local papers challenging the validity of the project and environmental documentation.
The Court of Public Opinion has spoken !!!!

http://www.sierrasun.com/news/18334272-113/tahoe-residents-flood-trpa-with-criticism-of-ridgeline

http://www.sierrasun.com/news/15319452-113/tahoe-truckee-realtors-taking-stand-against-ridge-line-development

PF19-14

http://www.sierrasun.com/news/18929362-113/opinion-lake-tahoes-death-by-a-thousand-cuts

http://www.sierrasun.com/news/18771829-113/opinion-setting-the-record-straight-regarding-martis-valley

http://www.rgj.com/story/opinion/voices/2015/08/26/op-ed-tahoe-development-deserves-scrutiny/32433587/

http://moonshineink.com/opinion/north-shore-evacuation-impossible-proposed-developments

http://www.sierrasun.com/news/22129993-113/opinion-make-your-voice-heard-about-martis-valley

http://www.sierrasun.com/news/18771824-113/opinion-martis-valley-west-is-a-bad-deal

http://www.sierrasun.com/news/20109787-113/opinion-brockway-campground-advertisement-presumptuous-misleading

http://www.sierrasun.com/news/21954624-113/opinion-squaw-martis-valley-west-projects-would-worsen

http://www.laketahoenews.net/2015/09/letter-ridgeline-development-a-disaster-in-the-making/

http://www.laketahoenews.net/2015/02/letter-martis-valley-project-reality-check/

IX. CEQA REFERENCES THAT MUST BE CONSIDERED

15093. STATEMENT OF OVERRIDING CONSIDERATIONS

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091

15091. FINDINGS

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
(b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.
(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

§ 21091. DRAFT ENVIRONMENTAL IMPACT REPORTS AND NEGATIVE DECLARATIONS; REVIEW PERIODS

(2) (A) With respect to the consideration of comments received on a draft environmental impact report, the lead agency shall evaluate comments on environmental issues that are received from persons who have reviewed the draft and shall prepare a written response pursuant to subparagraph (B). The lead agency may also respond to comments that are received after the close of the public review period.
(B) The written response shall describe the disposition of each significant environmental issue that is raised by commenters. The responses shall be prepared consistent with Section 15088 of Title 14 of the California Code of Regulation

15002. GENERAL CONCEPTS

(a) Basic Purposes of CEQA. The basic purposes of CEQA are to:
(1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.
(2) Identify the ways that environmental damage can be avoided or significantly reduced.
(3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

(g) Significant Effect on the Environment. A significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. (See: Section 15382.) Further, when an EIR identifies a significant effect, the government agency approving the project must make findings on whether the adverse environmental effects have been substantially reduced or if not, why not. (See: Section 15091.)

(h) Methods for Protecting the Environment. CEQA requires more than merely preparing environmental documents. The EIR by itself does not control the way in which a project can be built or carried out. Rather, when an EIR shows that a project would cause substantial adverse changes in the environment, the governmental agency must respond to the information by one or more of the following methods:
(1) Changing a proposed project
(2) Imposing conditions on the approval of the project;
(3) Adopting plans or ordinances to control a broader class of projects to avoid the adverse changes;

(4) Choosing an alternative way of meeting the same need;
(5) Disapproving the project;
(6) Finding that changing or altering the project is not feasible;
(7) Finding that the unavoidable significant environmental damage is acceptable as provided in Section 15093.

15088. EVALUATION OF AND RESPONSE TO COMMENTS
(a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
(b) The lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report
(c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.
(d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the Lead Agency should either:
(1) Revise the text in the body of the EIR, or
(2) Include marginal notes showing that the information is revised in the response to comments.

PF19

Ellie Waller
June 3, 2016

PF19-1 The comment expresses opposition to the project and requests recirculation of the EIR. The comment suggests that Alternative 5, which was described and evaluated in the Final EIR is cause for recirculation. As described in Chapter 2 of the Final EIR, assessment of Alternative 5, clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Master Response 1 in Chapter 3 of the Final EIR regarding recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

The comment also raises concerns regarding the time available for review prior to the Planning Commission hearing. Public comment was heard at the June 9, 2016 Planning Commission meeting, and public comments will be taken at the subsequent Board of Supervisors meeting. Both of these meetings have or will take place at least 30 days following the May 3, 2016 release of the Final EIR.

The comment raises concern about ridgelines. Please see response to comment IO51-46 in the Final EIR.

The comment raises concerns related to the Brockway Campground. As explained in response to comment IO18-62 and Master Response 2 in the Final EIR, the Brockway Campground Project is a separate proposal for which project-specific environmental review will be required and has not yet commenced. The Draft EIR considers the campground in the cumulative analysis.

Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF19-2 The comment raises concerns regarding Alternative 5, stating that a reduced density alternative on the East Parcel with a conservation easement should be evaluated. As stated in response to comment PF19-1, recirculation is not required, as the evaluation of Alternative 5 in the Final EIR, clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Master Response 1 in Chapter 3 of the Final EIR regarding recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.) The commenter's assertions regarding the effects of a reduced density alternative on the East Parcel with a conservation easement are unfounded and do not correctly cite the impact determinations of the EIR. For example, the Draft EIR did not find that there would be a significant and unavoidable impact due to the project development abutting the Lake Tahoe basin boundary line. Please refer to Master Response 10, "Alternatives," in the Final EIR, which addresses concerns related to the adequacy of the CEQA alternatives analysis.

PF19-3 The comment reiterates that there are six significant and unavoidable impacts that would occur regardless of which alternative is selected, and that the identification of significant and unavoidable impacts doesn't mean that a project should be approved. The commenter requests that the project be denied until an alternative with no significant and unavoidable impacts can be identified. In accordance with CEQA, the Board of Supervisors must determine whether the benefits of the project outweigh the significant and unavoidable impacts prior to deciding whether to approve the project.

The comment states that modeling cannot predict the effects of the project and that it will violate dark skies ordinances and objectives. In fact, modeling is a common and credible method of predicting the effects of a project (see below for responses to specific comments regarding the modeling done for the proposed project).

The comment also states that the impact would be less than significant if the project were built on the East Parcel. The County does not have a dark sky ordinance or objectives. However, the Draft EIR does evaluate the effects of the MVWPSP on nighttime views and concludes that the project contribution to cumulative lighting would be significant and unavoidable (see Impact 9-9 in the Draft EIR). The Draft EIR finding is based on the effects of lighting visible from the Martis Valley. Development on the East Parcel would also be visible from Martis Valley, so the impact would remain significant and unavoidable if the East Parcel were developed rather than the West Parcel. The impact would likely be even more severe if the East Parcel were developed at the density allowed under current zoning of 1,360 units, 600 more units than could be developed on the West Parcel.

Regarding the cumulative impacts and the Brockway Campground, please see Master Response 2.

Regarding the tree removal analysis, the tree model used in the visibility studies took into account tree removal required for setback of structures and road. It also assumed a 50 percent transparency for the remaining trees to account for tree thinning and natural tree translucency. See response to comment 18-26 in the Final EIR, for a more detailed explanation of the approach to tree removal.

Regarding lighting, lights pointing downward will illuminate the ground. Due to the topography of the ridge, the ground surface of the project site would not visible from the Tahoe Basin, even in a bare earth scenario. The ground surface of the project site is also not visible from Martis Valley because of topography and vegetative cover, including 70-foot-tall trees.

Regarding the measurement of building heights, using both height of structure and grade is the only way to ascertain the highest point of the structure. For both daytime visibility studies and night-time lighting studies, buildings were modeled by actual height, placed at the highest point of the grade. Structures were place at the highest point of the grade as a conservative estimate.

PF19-4 The comment raises concerns regarding traffic and vehicle miles traveled. Please refer to Master Response 6, “Vehicle Miles Traveled and Added Vehicle Miles in the Tahoe Basin,” in Section 3.1.6 of the Final EIR. With regard to payment of impact fees for traffic impacts generated by the project, see responses to comments I06-8 and I026-15 in the Final EIR.

The comment also raises concerns regarding greenhouse gas emissions. Please refer to Master Response 7, “Approach to Greenhouse Gas Analysis,” in Section 3.1.7 of the Final EIR.

PF19-5 The comment expresses concern regarding fire code and the secondary emergency vehicle access road. Please refer to response to comment PF15-1 from Mark Shadowens, Chief, Northstar Fire Department, as well as the response from the project applicant provided in PF32-1.

PF19-6 The comment expresses concern regarding the Emergency Preparedness and Evacuation Plan (EPEP) as well as fire code requirements for access roads. Again, please see response to comment PF15-1 from Mark Shadowens, Chief, Northstar Fire Department, as well as the response from the project applicant provided in PF32-1. Please see Master Response 9 of

the Final EIR regarding the EPEP. As stated therein, the draft EPEP includes an overview of the regulatory requirements that apply to the MVWPSP, including such topics as fuel maintenance, defensible space, structural and infrastructure requirements (e.g., fire flow minimums, emergency access road standards), building code requirements and the County's ordinances for construction in avalanche zones and flood damage prevention.

PF19-7 The comment addresses changes in the MVWPSP proposal for Workforce Housing. The MVWPSP would comply with County requirements for Workforce Housing, which include constructing employee housing on or off site, dedicating land for employee housing units and/or payment of an in lieu fee. Initially, the MVWPSP proposed paying the in lieu fee so that the funds could be used to purchase and/or construct employee housing in the most appropriate location. After the Draft EIR was released, the applicant identified 6.9 acres of land within the MVWPSP that could be dedicated to employee housing. Upon further consideration and after discussion with Placer County, the applicant has proposed to return to the payment of the in lieu fee. Either of these approaches would meet County requirements for employee housing under the County General Plan. In addition, through the development agreement, the applicant is contributing $125,000 to the County for use to address Workforce Housing. This payment is above and beyond the in lieu fee for the MVWPSP employee housing requirement.

The comment suggests that one unit should be provided for each employee, but does not explain its rationale. Larger units with multiple bedrooms could house more than one employee. The comment also states that two and three bedroom units are less desirable and more expensive, but does not indicate why, or how it would affect the provision of employee housing.

The comment objects to payment of in-lieu fees as a means to comply with workforce housing requirements. However, this is an approved method by which to comply with such requirements, and by collecting fees from multiple projects, the County would be able to pursue a wider range of housing options (e.g., construction and/or purchase of appropriate housing in areas where services and amenities that full-time residents require are present, subsidizing housing) then if each and every development project provide its own onsite workforce housing. This approach also enables the County to respond to changing employee housing needs over time. The MVWPSP would contribute 75 percent of the housing fee prior to any units being constructed, so the County would have access to the most of the funding prior to generation of any demand for employee housing.

PF19-8 The comment refers to Development Review Committee and questions when the committee met. The comment does not directly address the EIR or the environmental analysis. Future Development Review Committee meetings would be reported.

PF19-9 The comment states that the Development Standards reference the Lake Tahoe region as being part of the property and that the EIR states that the project is not within the Tahoe Basin. The Development Standards (Appendix B of the MVWPSP) do not state that the MVWPSP is located within the Lake Tahoe Basin. Rather, page B2 states that the MVWPSP is located within the Martis Valley and the Lake Tahoe region. The Lake Tahoe region can be defined as including the Tahoe Basin and surrounding areas. For example, the North Lake Tahoe Resort Association includes members from Truckee, Northstar, and Squaw Valley.

Cumulative traffic impacts are analyzed in the Draft EIR (see Impacts 10-8 through 10-13).

For a discussion of tree removal in the visual analysis, please see Response 18-26 in the Final EIR.

PF19-10 The comment states that the Specific Plan should retract all references to Tahoe. Please see response to comment PF19-9.

PF19-11 The comment objects to the Specific Plan provision that Design Guidelines may be modified pursuant to Government Code Section 65853 et seq. and Section 17.60.090 of the Placer County Zoning Ordinance under certain conditions without a Specific Plan Amendment. The comment suggests that changes should be considered discretionary approvals subject to committee/commission review and public notice. As stated on page B9 of the MVWPSP, a Specific Plan Amendment would not be needed for modifications to Development Standards that would not materially change the physical characteristics of the anticipated development. The County would review any modifications to ensure that they meet the standards, and if the modification would not be consistent with the Specific Plan and/or materially change the physical characteristics of anticipated development (such as a substantial increase in height), the modification would be subject to additional review, which could include a Specific Plan Amendment and/or additional CEQA analysis.

The comment requests that the Development Standards meet or exceed the Placer County code. As allowed under State law, the proposed Development Standards would supersede the relevant sections of the Placer County Zoning Ordinance. The provisions of the Development Standards are clearly delineated (for example, setbacks are listed under 5b). The comment does not indicate which of these provisions should be more stringent than the County Code or why.

There are a number of locations where the siting of homes could capture attractive views, including views into the center of the MVWPSP site and of the Martis Valley. In some cases, there may be distant views of Lake Tahoe. As discussed in Response 13-7, a home on the MVWPSP site may be able to view the lake in the distance without itself being discernable from the lake. As discussed in Impact 9-1, the MVWPSP would not have a significant impact on views from Lake Tahoe, and therefore the project would not adversely affect the Lake Tahoe viewshed.

PF19-12 The comment states that all maps should include topographic elevations. Elevations are reported where necessary to conduct and/or understand the analysis, such as the profiles shown on pages 9-8 through 9-18 of the Draft EIR. Topography is shown on Figure Z of the MVWPSP, which allows the area shown to be located on larger project maps. Therefore, it is not necessary to include the elevations on this small figure. Similarly, elevations do not need to be shown on other maps that are not meant to be used for an analysis based on topography (e.g., Figures 5-1 and 5-2 of the MVWPSP which show the water and sewer plans).

PF19-13 The comment raises concerns regarding scenic resources, incorrectly stating that “removing the project from a ridgetop shared with the Tahoe basin boundary eliminates the visual significant and unavoidable Impact 9.9.” This is incorrect. Please see Master Response 4 in the Final EIR. As shown in the Draft EIR (see Impacts 9-1 and 9-4), implementation of the MVWPSP design standards would result in development that would not be visible from North Tahoe communities or from the Lake at distances of 300 feet, 450 feet and ¼ mile (Draft EIR page 9-33). The significant and unavoidable cumulative impact on light and glare (Draft EIR Cumulative Impact 9-9) determined that light sources and glare from the project area would not be visible from the Lake Tahoe Basin, or nearby recreation areas such as the Fibreboard Freeway. While future projects could result in new sources of light and glare visible from nearby recreation areas or the Lake Tahoe Basin, the MVWPSP would not substantially contribute to these effects. Therefore, the MVWPSP would not result in a considerable contribution to cumulative impacts from light and glare visible from nearby recreation areas or the Lake Tahoe Basin. However, the new light sources from buildout of the MVWPSP would be clearly visible from Martis Valley and would introduce new light

sources in a portion of the view that is not already affected by light, which would contribute to the existing adverse effects on nighttime views. Thus, the MVWPSP would result in a considerable contribution to a cumulatively significant impact on nighttime views for which no additional mitigation is feasible.

The comment also raises concern about the timeframe of public review and meetings. Please see response to comment PF19-1, above.

The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF19-14 The comment notes articles in local papers expressing opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

FRIENDS OF THE WEST SHORE
• Protecting Our Watersheds • Wildlife • Rural Quality of Life

SIERRA CLUB
FOUNDED 1892

Tahoe Area Sierra Club Group

PF20

Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603

June 6, 2016

Subject: Martis Valley West Project Specific Plan (PGPA 20130080), State Clearinghouse No. 2014032087

Dear Members of the Planning Commission:

The Friends of the West Shore (FOWS) and the Tahoe Area Sierra Club (TASC) appreciate the opportunity to provide comments regarding the proposed Martis Valley West Specific Plan (MVWPSP), including the Final Environmental Impact Report (FEIR).

The FOWS and TASC believe the FEIR fails to disclose or fully evaluate the potential environmental impacts of the proposed MVWPSP, including within the Lake Tahoe Basin (detailed comments are attached). While the project area may not be located in the Basin,[1] the boundary between the MVWPSP and the Basin is indistinguishable with respect to GHG emissions, scenic degradation, light pollution, trespass and glare, and traffic, including significant project-created congestion and vehicle miles traveled. PF20-1

The FEIR has noted significant and unavoidable impacts from the project, as proposed, without sufficient mitigation to alleviate these impacts. In addition, the FEIR fails to disclose (and therefore, mitigate) numerous additional significant impacts to the Lake Tahoe Basin and Truckee/Tahoe region. Unmitigated and in some cases, undisclosed impacts include, but are not limited to:

- Potential impacts to national scenic resources (daytime and nighttime) as observed from numerous locations around the Lake Tahoe Basin, including on the lake, from scenic highways, recreational trails and facilities, and popular mountaintop vistas;
- The additional traffic that will impact North Lake Tahoe and the entire Basin;
- The disruption of a primary emergency evacuation route for North Lake Tahoe (SR 267);
- The increased threat posed to people and firefighters from the placement of this project in a high fire danger area; and
- The cumulative impacts of the proposed Project in addition to other nearby projects, including the proposed Brockway Campground.

As reflected in the FEIR's deletion of Policy 1.A.1 ("The County will promote efficient use of land and natural resources and will encourage "in fill" development"[2]), the proposed is in direct conflict with Placer County's efforts, as well as statewide efforts, to encourage infill development. In addition, the North Tahoe Regional Advisory Council (NTRAC) did not recommend the project, noting concerns with insufficient timing to review the FEIR and the impacts of the project at their 5/12/2016 meeting.

[1] Notably, the boundary line has been the subject of several proposals, including a requested boundary line amendment in February 2015.
[2] This policy is deleted in the FEIR, as noted on p. 2-8.

We have the following additional comments based on review of the staff report, final CEQA Findings of Fact and Statement of Overriding Considerations (Findings), and related materials provided on June 2 for the June 9th Planning Commission meeting:

- The EIR concludes that Alternative 3 is the environmentally-superior action-based alternative (Findings, p. 31) which meets one of the key objectives: the transfer of development potential from the East to West Parcel. However, the Findings include a summary from a new *Martis Valley West Parcel Specific Plan Economic Viability Analysis* ("Economic Report") dated May 2016[3] - notably not made available to the public - to claim that Alternative 3 is not economically feasible. Given the MVWPSP will guide the next 20 years of development in the area and result in numerous significant and unavoidable impacts, the public should be afforded the opportunity to review and comment on this Economic Report. The Planning Commission meeting is now days away, the public was just informed of this report and its significant implications on June 2nd, and no copy has been made available to the public, nor has Placer County performed an independent review of such information to assess whether dismissal of the environmentally-superior alternatives is reasonable based on the cost differences between the alternatives and the proposed project.. PF20-2
- According to the Findings, Alternatives 3 and 5 would reduce the severity of all environmental resource impacts (p. 31). However, the Findings give little more than cursory attention to the reduced *severity* of impacts – which should be taken into account when weighing the pros and cons of the project. For example, the new peak vehicle trips generated by Alternatives 3 and 5 are almost 50% less than the proposed project. This is a substantial difference, yet the Findings often simply state that Alternatives 3 and 5 would "not avoid the significant and unavoidable impacts" – thus minimizing the discussion of the *severity* of impacts that should play a key role in deliberations on the Proposed Project. In addition, the FEIR's purported analysis of Alternative 5 provides very little quantitative information, instead relying on generalizations about impacts being 'similar to or less than' the Proposed Project. For example, every additional vehicle added to a roadway already experiencing severe congestion increases the delay, emits more air pollution, and further impedes evacuation routes and emergency access. Therefore, minimizing the number of additional cars has a positive effect. The *severity* of impacts must be considered when the projects presumed benefits are weighed with consequences. PF20-3
- The Findings misrepresent the fire danger by claiming the project will reduce the risk of wildfire in the area through improved access to water and defensible space. However, adding more development to an undeveloped area *increases* wildfire danger and places more people in a hazardous area.[4] If a fire were to occur on the West Parcel now, firefighters can concentrate resources on protecting SR 267 and other areas; once there is development on the West Parcel, fires are more apt to be started[5] and will be far more difficult to fight. In addition, the Findings PF20-4

[3] "Mountainside Partners LLC has provided information regarding the economic feasibility of the Project compared to Alternative 3, the Reduced Density Alternative and Alternative 5, the East Parcel, Reduced Density Alternative. The results of this study are located in the report titled *Martis Valley West Parcel Specific Plan Economic Viability Analysis, Alternative 3 and Alternative 5* (May 2016). This study is presented as evidence that Alternative 3 is economically infeasible." (p. 24).

[4] http://sierranevadaalliance.com/wp-content/uploads/dangerous-development.pdf

[5] Most wildfires are started by humans, not nature. For example, see Calfire statement at: http://www.voiceofsandiego.org/topics/news/how-wildfires-start-hint-its-usually-not-arson/

also state that the project will "not diminish services to existing residents" (p. 33). However, new development in fire-prone areas diverts firefighting resources from other areas.[6] PF20-4

- Contrary to claims in the Findings,[7] the proposed West Parcel developments are not "in proximity to" or "in the vicinity of" other development – another point clarified by members of the North Tahoe Regional Advisory Council (NTRAC). The Findings also imply the West Parcel is developed while the East Parcel is not,[8] however *neither* parcel is developed. These statements misrepresent the existing conditions on the West Parcel.

We therefore urge you to deny the project, as proposed, and ask that you consider alternative 5 (included in the Final EIR), with the inclusion of a conservation easement and/or sale to a land trust of the acreage outlined in the Martis Valley West Opportunity Agreement and a conservation easement for the land upon which the Brockway Campground is proposed, after an adequate analysis of the environmental impacts is undertaken and all feasible mitigation measures have been included. Approval of the project as currently proposed will result in a great injustice to Tahoe's environment and communities. PF20-5

We would be happy to meet with you to discuss our concerns. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net or Laurel Ames at amesl@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President
Friends of the West Shore

Laurel Ames,
Conservation Chair
Tahoe Area Sierra Club

Jennifer Quashnick,
Conservation Consultant

Our comments address the following topics:	**Page #**
Analysis of Existing Conditions	4
Transportation Impacts	6
Mitigation for Transit Impacts	14
Cumulative Impacts with Brockway Campground	16
Impacts to Emergency Evacuations and Access on SR 267	20
Water Supply Concerns	23
Scenic impacts	23
Mitigation Measures	29
Greenhouse Gas Emissions	30
Recirculation of DEIR	30

[6] http://www.laketahoenews.net/2016/05/threat-of-fire-ignites-concern-in-tahoe-basin/
[7] http://www.placer.ca.gov/~/media/cdr/planning/pc/2016/june9/attachmentspart3.pdf?la=en; (p. 20 and 27, resp.)
[8] "At present, development along the SR 267 corridor focuses on Northstar Ski Resort, on the west side of SR 267. The area east of SR 267 is largely undeveloped…" (p. 27).

FOWS and TASC submitted extensive technical comments regarding deficiencies in the draft EIR (DEIR), as did numerous other organizations, agencies, service providers, and members of the public.[9] However, many of our comments were either not addressed, were dismissed, reinterpreted and responded to incorrectly, or 'merged' such that numerous detailed points are only 'responded to' by large blanket statements or references to Master Responses. PF20-5 cont.

1. Analysis of existing conditions

As noted in our DEIR comments, the EIR frequently compares impacts to a hypothetical full buildout of existing Plans (e.g. Martis Valley Community Plan)[10] and an unrealistic future scenario (e.g. GHG emissions). Whether the project meets existing land use and Scoping Plan requirements or not is distinctively different than CEQA's requirements to analyze and disclose the potential environmental impacts based on *existing physical conditions*. In this sense, comparisons to the 'allowable uses' on the East Parcel are irrelevant. PF20-6

Although this applies to numerous resource impact chapters, here we focus on the issue of future population growth. The EIR concludes that the project's population growth of 1,900 people is "within the growth anticipated in the Placer County MVCP," and therefore this is a less-than-significant impact.[11] However, as noted in our DEIR comments reprinted below, a review of the environmental documents for the 2002 MVCP, the 1994 Placer County General Plan, and the 1975 Martis Valley Community Plan revealed that no such analysis has ever been performed. Rather, each document simply referred back to previous documents, thereby skirting this assessment for over forty years.

> "Tracing the origins of the original 'holding capacity' has been difficult. First, as noted above, the MVWPSP DEIR concludes less-than-significant impacts on growth because the population increase is within the anticipated growth for Martis Valley. An examination of the 2002 MVCP EIR shows that the DEIR, at that time, concluded less-than-significant impacts because the growth was already anticipated by the 1994 Placer County General Plan,[12] and the holding capacity had been 'reduced'

---

9 http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/martisvalleywestparcel/draft%20eir/draft%20eir%20comments

10 E.g. "Further, the reduction in the number of allowable units in the Martis Valley, from the 1,360 dwelling units allowed in the MVCP to the 760 units proposed in the MVWPSP (a reduction of 600 units), would represent a reduction in the maximum anticipated population by approximately 1,500 persons." (p. 6-13).

1111 "The anticipated population at buildout of the MVWPSP, based on 760 proposed units and 2.5 persons per unit, would be 1,900 persons, which would be within the holding capacity (i.e., maximum growth anticipated) of Martis Valley (21,500± persons) and consistent with the vision identified in the MVCP. This impact would be less than significant." (Impact 6-2, DEIR, p. 6-10).

12 "Although the proposed project would result in population growth in the area, the Plan area is designated for such growth as a Community Plan area in the General Plan. Therefore, impacts relating to population growth are considered less than significant." (MVCP DEIR, p. 4.2-16);

"The transportation impact analysis focused on 2010 travel demands and needs. Travel forecasts were also made for 2040 conditions so that transportation corridors that would be needed beyond 2010 under the *General Plan* could be identified (these corridors are shown on the Circulation Diagram as "post-2010" roadways). This long-horizon evaluation is, by its nature, a less precise analysis of future travel conditions than the 2010 analysis. Its purpose is to give a general indication of the magnitude of travel demand and

> because some lands had been developed below the maximum permitted density.[13] An examination of the EIR for the 1994 Placer County General Plan reveals the EIR also concluded less-than-significant impacts on population growth because the prescribed growth was within the anticipated holding capacity for Martis Valley per the 1975 General Plan.[14] In essence, it appears that there has been no carrying capacity analysis for at least forty years, if one was even performed then. Regardless, CEQA requires the significance of the environmental consequences of a project be evaluated against *existing* conditions. The DEIR and project applicant rely on the project being 'within the capacity' of the MVCP to minimize several resource impacts (e.g. traffic[15] and population growth[16]) and/or relies on the claim that this is a reduction in units compared to what zoning would allow on the East Parcel.[17]" (Labeled as comment IO18-8, FEIR, p. 3.5-83 to -84).

PF20-6 cont.

As a result, the EIR perpetuates the technical deficiency related to analyzing the holding/carrying capacity of this area of the Martis Valley. Even if there had been an analysis in 1975, the impacts of human population and development today are quite different from forty years ago. For example, the new homes contemplated by the MVWPSP have a much larger footprint than typical homes built in the area in 1975. Further, the FEIR dismisses our comments regarding the distinction between the holding capacity (determined by land use and math, not environmental analyses) and carrying capacity (based on environmental factors) by claiming that carrying capacity only applies to wildlife populations.[18] In fact, use of an environmental carrying capacity to assess the impacts of human development is not a novel concept – the Lake Tahoe Basin is regulated through the TRPA Bistate Compact,[19] which specifically calls out the human

needs under the *General Plan* when Placer County is closer to its population holding capacity." (Placer County Countywide General Plan FEIR, p. 4-11).

[13] "The Plan area's holding capacity is the product of the permitted densities specified in the land use districts, and the acreage within each district. The County has adjusted this figure to reflect actual densities in those areas that are already fully developed. For those areas that are not fully developed, the County has reduced the theoretical maximum holding capacity by 20%. This reduction reflects the fact that due to market or environmental or other constraints, property rarely develops at the maximum theoretical density afforded by the applicable land use designation. In this fashion, the County calculated that the MVCP has a holding capacity of approximately 8,600 dwelling units." (MVCP, p. 30).

[14] "As described in the 2002 MVCP DEIR, it appears the 1975 General Plan assigned holding capacity based on certain physical parameters (e.g. slope, access), but this approach again suggests a 'density per acre' assignment, rather than a true carrying capacity in terms of population and traffic: 'The plan, adopted in 1975, used a set of physical constraints to identify lands with development potential within Martis Valley; these constraints included slopes in excess of 30 percent, slopes with low stability, areas difficult to access, and areas of ecological value, including important wildlife habitats and open space area (Placer County, 1975).'" (MVCP DEIR, p. 4.1-7).

[15] At the 11/19/2015 Placer County Planning Commission, applicant Blake Riva stated the project would result in a "35% reduction" in traffic; however, this is 'compared to' the maximum density allowed by the current MVCP on the East Parcel, not to existing conditions.

[16] "The anticipated population at buildout of the MVWPSP, based on 760 proposed units and 2.5 persons per unit, would be 1,900 persons, which would be within the holding capacity (i.e., maximum growth anticipated) of Martis Valley (21,500± persons) and consistent with the vision identified in the MVCP. This impact would be less than significant." (DEIR, p. 6-10).

[17] "The East Parcel is approximately 6,376 acres, 670 acres of which are zoned for residential and commercial development under the Martis Valley Community Plan. The proposed project would shift 760 units and 6.6 acres of commercial from the allowed development of 1,360 units and 6.6 acres of commercial on the East Parcel to the West Parcel. The project would permanently retire 600 allowed units." (2015 NOP, p. 1).

[18] "Moreover, given that ecological carrying capacity is a concept typically applied to the size of a wildlife population the environment can sustain given the availability of food, water, and habitat available in the environment, the concept does not lend itself to a human population on a project development site." (FEIR, p. 3.5-158).

[19] http://www.trpa.org/bi-state-compact/

carrying capacity of the Basin.[20] Thus, there remains no analysis of the carrying capacity of the Martis Valley; this needs to be corrected before substantial new developments are approved. PF20-6 cont.

The FEIR also refers to a "project development site" in the response, thus mischaracterizing our comments, which applied to the area covered by the entire Specific Plan, not an individual project site.

2. Transportation Impacts

Our DEIR comments identified numerous problems with the transportation analysis which need to be corrected. Unfortunately, the FEIR fails to address our comments.

A. Occupancy rate

The DEIR examines other potential impacts based on a 100% occupancy rate, yet assumes *only 20%* full time occupancy for the transportation analysis, as noted in our comments: PF20-7

> "The DEIR evaluates the maximum potential impacts – that is, assuming 100% full time occupancy – for natural gas and electricity,[21] light pollution,[22] water supply,[23] GHGs (for non-mobile sources),[24] and wastewater treatment services,[25] yet the traffic impacts are based only on 20% full-time occupancy.[26]" (Labeled as comment IO18-10 in the FEIR, p. 3.5-86).

Because the trip generation rates for part-time occupancy are lower than full-time occupancy, assuming only 20% full time occupancy results in fewer trips in the EIR (versus the use of 100% full time occupancy trip rates). As noted in our DEIR comments, the MVWPSP does not include any limits regarding occupancy of the homes, thus full time occupancy of all units is a potential outcome of the

[20] Article I (b): "In order to enhance the efficiency and governmental effectiveness of the region, it is imperative that there be established a Tahoe Regional Planning Agency with the powers conferred by this compact including the power to establish environmental threshold carrying capacities and to adopt and enforce a regional plan and implementing ordinances which will achieve and maintain such capacities while providing opportunities for orderly growth and development consistent with such capacities." [Emphasis added].

[21] "Energy (natural gas and electricity) emissions are based on Estimates for Gas and Electric Utilities Usage for the MVWP Project (see Chapter 16, "Utilities," which conservatively assume full-time occupancy of all units." (DEIR, p. 12-13).

[22] "The nighttime photo simulations represented a worst-case scenario that assumed illumination in all windows in all buildings" (DEIR, p. 9-30)

[23] "The Water Supply Assessment prepared for the MVWPSP estimates that buildout of the West Parcel could result in a water demand of 325 acre feet per year (afy) (see Table 15-1), assuming 100 percent occupancy of the 760 proposed units (Stantec 2015)." (DEIR, p. 15-21)

[24] "The analysis provided herein is considered conservative because it is based on the assumption that the 760 residential units would be occupied full-time…" (DEIR, p. 12-10).

[25] "However, these are conservative estimates because they assume 100 percent occupancy of the development…" (DEIR, p. 16-24).

[26] E.g. "Mobile source GHG emissions are derived from the traffic analysis, which assumes that 20 percent of the units are permanent, year-round occupants and the remaining 80 percent are seasonally occupied." (DEIR, p. 12-13).

Project. As a result, the DEIR's claim[27] that "the analysis has focused on the project's highest possible traffic impacts" is not correct. As reflected by the ITE trip generation rates, the "highest possible traffic impacts" occur when the units are occupied on a full-time basis.

The FEIR also fails to directly respond to our comments regarding occupancy. For example, the FEIR reiterates the difference between assuming part-time versus full-time occupancy, noting that the use of a 20% full-time occupancy versus 100% full-time occupancy does not mean that the number of units and associated trip generation are "summarily reduced by 80 percent."[28] Our DEIR comments clearly explained that it was not a linear relationship, but rather that the trip generation rates are different for part-time versus full-time occupancy.[29] However, the FEIR misrepresents our comments, responding with a statement about what occupancy options are, rather than addressing the issue of the trip rates associated with the types of occupancy.[30] The FEIR also states that the trip generation for the study periods only represents trips that occur during the peak hour. As noted in Table 10-11 (image below), the peak-hour trip generation rates for units occupied full time is also greater than the peak-hour trip generation for units occupied part-time. Therefore, whether one examines the daily trip generation or the peak trip generation rates, units occupied full-time generate more trips than units occupied part-time. Thus, analyzing the maximum potential traffic impacts would require assuming *all* units are occupied full time – a very likely scenario during peak Holidays and weekends over the summer. PF20-7 cont.

[27] "By basing the traffic study on the unit mix with the highest aggregate trip generation rates, the analysis has focused on the project's highest possible traffic impacts." (DEIR, p. 10-20).

[28] The Draft EIR neither states nor implies that the second home residences are only occupied 20 percent of the time. Rather, the traffic study assumes that 20 percent of the single-family homes and townhomes are represented by the full-time occupancy trip rates, and that 80 percent of those residential units are represented by the second home trip rates. The ITE manual provides different trip generation rates depending on whether the dwelling unit is a full-time occupancy home, or a second home... The number of units and associated trip generation are not summarily reduced by 80 percent; instead, the ITE manual recommends the use of trip-generation rates based on data gathered at other, similar projects. (FEIR, p. 3-16).

[29] "Notably [category of part time occupancy] generates fewer trips per unit; thus a higher makeup of part-time residential units will translate into fewer trips from the project when compared to full time occupancy of the units." (FEIR, p. 3.5-86).

[30] "The commenter further elaborates that the part-time residences may be occupied during peak periods. As discussed in Master Response 5 regarding trip generation assumptions and methodologies, the traffic analysis assumes that most homes are occupied. The split between full- and part-time pertains to the type of occupant—a full-time, permanent resident, or a second homeowner or guest." (FEIR, p. 3.5-159).

Table 3.6-11 Project Trip Generation

Land Use	ITE Land Use (Code)	Size[1]	Trip Rates: Daily	p.m.	% p.m. In/Out	Sunday Daily	Sunday Peak	% Sunday Peak In/Out	Commercial Discount[2]	External Trips: Daily	p.m.	p.m. In/Out	Sunday Daily	Sunday Peak	Sunday Peak In/Out
Residential Trips															
Single Family Homes															
Full-Time (70%)	Single Family Housing (210)	100 du	9.62	1.00	63%/37%	8.62	0.80	53%/47%	10%	857	90	57/33	776	77	43/35
Part-Time (30%)	Recreational Homes (260)	400 du	3.61	0.26	45%/55%	2.83	0.36	46%/54%	0%	1,444	104	47/57	1,132	144	66/78
Townhomes															
Full-Time (70%)	Townhome (230)	40 du	5.81	0.52	67%/33%	4.64	0.40	49%/51%	10%	209	19	13/6	174	16	9/8
Part-Time (30%)	Recreational Homes (260)	160 du	3.61	0.26	45%/55%	2.83	0.36	46%/54%	0%	578	42	19/23	453	56	26/31
Cabins															
Part-Time (100%)	Recreational Homes (260)	60 du	3.61	0.26	45%/55%	2.83	0.36	46%/54%	0%	217	16	8/9	170	22	10/12
Total Residential Trips										3,305	271	136/134	2,707	317	154/163
Commercial & Amenities Trips															
Commercial & Amenities	Shopping Center (820)	34.5 ksf	*	*	48%/52%	25.24	3.19	49%/51%	50%	680	59	28/31	174	22	11/11
Total Commercial & Amenities Trips										680	59	28/31	174	22	11/11
Total External Project Trips										3,985	330	164/165	2,941	339	162/176

PF20-7 cont.

Further, although the DEIR notes that 'average' occupancy rates for other areas show lower values, once these structures are built, nothing will prevent them from being occupied on a full-time basis. In fact, as our climate warms and winters are less affected by snow, it is reasonable to expect that more people will seek full time residency in the region's mountainous areas, where summertime temperatures will be more tolerable than in lower-elevation populated areas (e.g. Sacramento, Bay Area, Reno).

Additionally, as stated in our DEIR comments,[31] the EIR for the Martis Valley Community Plan analyzed the *maximum* occupancy scenario (Table 4.2-11; MVCP DEIR, p. 4.2-16), although the EIR stated that full-time occupancy would be less.[32] The FEIR does not address this discrepancy.

B. Project Study Area

PF20-8

As noted in our comments on the DEIR,[33] the area analyzed for traffic impacts should include the entire "resort triangle." Impacts include LOS and VMT (the latter is addressed in a separate comment, discussed below). In response, the FEIR has included additional information regarding the impacts to SR 28 on either side (west and east) of the intersection with SR 267 (FEIR, p. 3.5-159 and -160). We appreciate the additional analysis of these impacts and discuss them further below. However, the EIR still fails to address the project's individual and cumulative impacts to roads in the *entire* resort triangle – specifically, SR 28 to Tahoe City and SR 89 between Tahoe City and Truckee. Impacts to SR 89 south of Tahoe City must also be properly assessed. The cumulative impacts are of

[31] Labeled as comment IO18-11, FEIR p. 3.5-87.

[32] "Projected permanent occupancy for the project would be less than anticipated in the Placer County General Plan, ranging from 43.7 to 64.2 percent of the General Plan holding capacity for Martis Valley." (MVCP DEIR, p. 4.2-16).

[33] Labeled as IO18-13, FEIR, p. 3.5-89 and -90.

exceptional concern given the multiple projects being considered in the area (e.g. Village at Squaw Valley, and other multiple developments at Squaw Valley and Alpine Meadows) that will also generate substantial traffic in the area.

With regards to the estimated impacts to SR 28 east and west of SR 267, there are several issues of concern:

PF20-8 cont.

- The increase in the V/C ratio between existing and existing plus project conditions (Table 3-7) is 0.04. The FEIR concludes no significant impact because the change is not 0.05 or greater. The estimated increase is very close to the 0.05 significance determination. It is likely that if the maximum potential occupancy were considered, the V/C ratio may increase by 0.05 or more, resulting in a significant impact.
- The FEIR refers to the "State Route 28 Transportation Corridor Concept Report (TCCR)" published by Caltrans in 2012[34] to state that the acceptable Level of Service for SR 28 is LOS E. This same Caltrans report notes that the lane reduction in Kings Beach is expected to result in a decline from LOS B to LOS E (in the roadway section on either side of the intersection of SR 28 and 267) within the next 20 years.[35] This degradation in LOS is based on Caltrans anticipated roadway projects; increased congestion from new projects that create more traffic is not taken into consideration in this report. As a result, if the cumulative conditions without the project are expected to degrade to E, then it is reasonable to assume that conditions with the project are more likely to reach LOS F.
- TRPA's LOS E requirements only allow for LOS E "during peak periods in urban areas, not to exceed four hours per day." As noted below, the FEIR does not evaluate the peak hour or hourly conditions, therefore it is impossible to determine whether the LOS E conditions will occur for more than four hours per day.
- The DEIR analyzes both the daily and peak hour LOS for the roadway segments it included.[36] However, the FEIR only evaluates the *daily* LOS on SR 28 west and east of SR 267. First, the significance of the impacts to roadway segments is based on the peak *hour* LOS, not peak *day*:

> **"Impact 10-2: Impacts to roadway segments:**
> The proposed project would worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28, resulting in a segment either degrading from acceptable LOS D to unacceptable LOS E, or exacerbating conditions on a segment operating at an unacceptable LOS E by an increase in V/C ratio of 0.05 or more, for both the summer and winter peak hours. This would be a significant impact." (DEIR, p. 10-29). [Emphasis added].

[34] http://www.dot.ca.gov/hq/tpp/corridor-mobility/documents/d_3_docs/SR28_signed_071812.pdf

[35] "This segment operates at LOS B; however, with the proposed lane reduction the LOS is expected to decline to LOS E within the 20-year planning period." (p. 6).

[36] "The existing roadway segment level of service was determined by comparing daily and peak-hour traffic volumes to the definitions in Tables 10-2 and 10-3." (DEIR, p. 10-9).

As a result, the information in the FEIR is not comparable to the significance criteria, and significance cannot be determined. Thus there is no evidence for which the FEIR can base the conclusion of "less than significant" impacts[37] to SR 28 road segments west and east of SR 267. PF20-8 cont.

Peak *hour* LOS is especially important when considering the project's impacts on evacuation routes in North Lake Tahoe. As noted in our comments regarding public health and safety, the EIR fails to address the project's impacts on the capacity of SR 267 to safely evacuate people during peak periods.

C. Failure to analyze regional VMT generated by project

In response to our comments regarding California's recognition of the importance of evaluating VMT,[38] the FEIR states: PF20-9

> "The comment states that the project's VMT impacts to all roadways should be examined and disclosed. Please see Master Response 6 regarding project VMT related to the Tahoe Basin. Regarding recommendations for changes to CEQA analyses of transportation impacts based on VMT rather than level of service (LOS), the California Governor's Office of Planning and Research released a discussion draft in summer 2014. It is expected that implementation of any formal changes would not occur until late 2016 or early 2017. The state of the practice for EIR analysis of transportation impacts continues to be based on LOS." (FEIR, p. 3.5-182).

While the Office of Planning and Research (OPR's) proposed CEQA Guidelines may not yet be legal requirements, the information identifying the importance of using VMT as a metric for evaluating transportation impacts has been available for several years. In addition, the recommendation to use VMT as the primary transportation metric has been proposed by OPR since 2014.[39] This is not new information. This project will have a 20-year construction timeline; to not rely on the best available information to assess the project's impacts in the EIR fails to meet CEQA's requirements to assess and disclose impacts.

D. Regional Traffic implications for Lake Tahoe:

We appreciate the FEIR's clarification regarding VMT methodology (e.g. whether VMT included both trip directions), however other questions and concerns that were lumped together into Comment IO18-20 were not addressed by the FEIR's response (p. 3.5-162). Specifically: PF20-10

[37] "Under both existing plus project and cumulative plus project conditions, the project would not worsen the roadway segments from acceptable LOS E to LOS F, and would not worsen already unacceptable LOS F by increasing the V/C ratio by 0.05 or more. Hence, project impacts to SR 28, both to the east and west of SR 267, would be less than significant." (FEIR, p. 3.5-161).
[38] Labeled as comment IO18-17.
[39] https://www.opr.ca.gov/s_sb743.php

- The cumulative impacts to VMT in the Lake Tahoe Basin need to be considered[40] (for example, the Village at Squaw Valley will increase in-Basin VMT by 1.2%,[41] while the MVWPSP estimates a 0.7% increase;[42] compared to the 2011 VMT estimates in the most recent TRPA Threshold Evaluation Report,[43] these two projects alone will create enough VMT as to violate TRPA's threshold). PF20-10 cont.
- Potential impacts need to be based on the maximum possible occupancy,[44] which would be reflected by the rates for 100% full-time occupancy (discussed above).

E. Wintertime peak LOS impacts:

As requested in our comments on the NOP[45] and repeatedly in the DEIR, impacts to the Lake Tahoe Basin need to be examined, including LOS and VMT, in terms of how they impact TRPA's standards. In the case of LOS, TRPA's Goals and Policies state that *peak period* traffic flow must not exceed LOS values. They do not say "30th highest" peak period (as is evaluated in the EIR). The DEIR also notes that the 30th highest peak hour is meant to represent a busy, but not absolute peak period of travel.[46] Therefore, for the FEIR to correctly assess the LOS impacts in the Lake Tahoe Basin and compare those impacts to TRPA's requirements (which are meant to define what constitute an impact within the Basin), the *peak period* traffic flow must be used. Nothing in the TRPA Code allows for a substitute, yet the FEIR responds to our comments by referring to the metrics relied upon in other 'eastside' Placer County documents - for projects not PF20-11

[40] "In addition, these estimates do not take into account the cumulative increases resulting from other approved but not-yet-built projects (e.g. Boulder Bay), proposed projects (i.e. Squaw Valley Village expansion), proposed Plans (such as Placer County's Tahoe Basin Area Plan), and the general increase in travel in the area[40] resulting from recovery from the economic recession and other factors." (FEIR, p. 3.5-94)

[41] http://www.placer.ca.gov/~/media/cdr/ecs/eir/vsvsp/finaleir/volume1/3.-d-.1%20rtc%20masterresponses.pdf?la=en

[42] "... the project would result in an estimated 0.7 percent increase in VMT within the TRPA boundary." (FEIR, p. 3-17)

[43] http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch3_Air-Quality_Oct2012_Final.pdf

[44] "Notably, homes that are not occupied full-time are likely to be occupied by renters, vacationers, or second-homeowners during peak times. The impacts of the greatest possible occupancy must be assessed in order to evaluate the potential impacts of the project." (FEIR, p. 3.5-94).

[45] "The DEIR/S must sufficiently analyze the increased traffic, including trips, VMT, and congestion, in the Lake Tahoe Basin as a result of this project. According to TRPA Code Section 65.4.2, the traffic analysis shall include: 1. Trip generation rates of the proposed project; 2. Impacts of the proposed project on the level of service at any impact intersections; 3. Impacts of the proposed project on regional vehicle miles travelled (VMT); 4. Impacts of the proposed project on regional and subregional air quality; 5. Ingress and egress characteristics of the proposed project, and their impacts on traffic flow adjacent to the project area; 6. Measures necessary to mitigate all traffic and air quality impacts to a level consistent with the environmental thresholds, the Goals and Policies, the Regional Transportation Plan, and the 1992 Air Quality Plan; and 7. Additional information that TRPA may require." (3/28/2015 NOP Comments, p. 17).

[46] "For winter conditions, the 30th highest peak hour of the ski season was analyzed. The 30th highest hour is often cited in transportation literature (such as *A Policy on Geometric Design of Highways and Street*, 4th Edition, American Association of State Highway and Transportation Officials 2001) and is used to establish the "design hourly volume." It is meant to represent a busy, but not absolute peak period of travel. The 30th highest peak hour was calculated by applying a numerical factor to the actual counts that were taken for the project on March 9, 2014 (see below under "Winter")." (DEIR, p. 10-4)

located within the Tahoe Basin – to conclude that the 30th highest peak value is appropriate.[47] Until the peak period traffic impacts to the Lake Tahoe Basin are assessed, there is no way to determine whether these impacts will be significant within the Lake Tahoe Basin. PF20-11 cont.

F. Cumulative traffic impacts:

We requested that the traffic counts used for the analysis be compared to historical counts in order to ensure that the traffic that could be supported by existing infrastructure was accounted for; we also noted that traffic during the time period (2013 and 2014) was generally still lower than it had been in years before the Great Recession,[48] providing yet another reason to compare the baseline traffic counts to historical data. In response, the FEIR examined the traffic counts for just five years – from 2009 to 2014 (all notably after the Great Recession) – and concluded the DEIR's analysis to be adequate.[49] This fails to address our comments. PF20-12

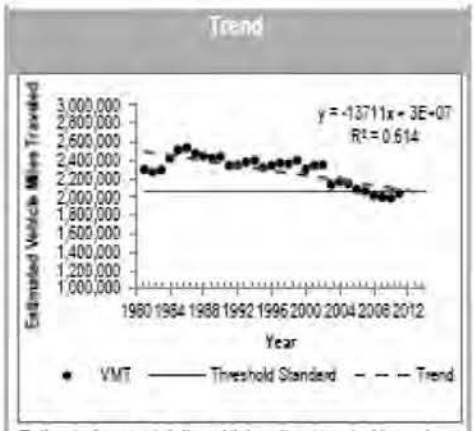
As illustrated by the figures below (from TRPA's most recent Threshold Evaluation Report[50]), vehicle miles traveled on Lake Tahoe's roadways have been much higher in past years (and peak winter traffic volumes, which affect LOS, have also been higher), and the same roadway infrastructure still exists today. There is also more development today than 10, 20, or even 40 years ago. Therefore, even without adding new development, traffic volumes on our roadway systems could substantially increase. The EIR needs to consider the potential cumulative impacts of the project, which may include resurgence in traffic under existing conditions. This is why we requested the traffic counts be compared to historical counts to ensure the maximum potential cumulative traffic impacts are assessed.

[47] "Consistent with other EIRs completed in eastern Placer County, impacts on study roadways and intersections are determined by measuring the effects of project traffic on the summer weekday (Friday) pm peak hour and the winter 30th highest peak hour. The winter peak is technically defined as the 30th-highest peak hour of travel demand during the ski season, which is used in other eastern Placer County EIRs, such as the Northstar Mountain Master Plan EIR (Placer County, 2003)." (FEIR, p. 3.5-162).

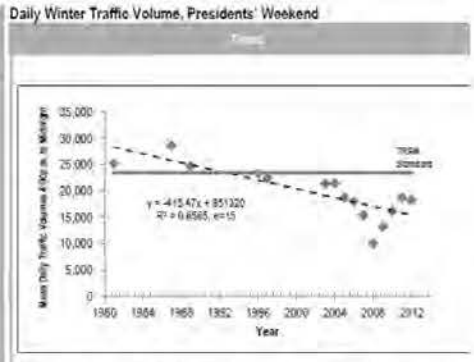
[48] Labeled as comment IO18-22, FEIR p. 3.9-56.

[49] "The comment states that the traffic counts used in the Draft EIR were collected in 2013 for the summer and 2014 for the winter, which may represent lower than average traffic based on the Great Recession and the drought, and states that traffic counts be compared to 2015 and historical counts in order to adequately analyze peak traffic conditions. The traffic counts were collected at the time the study was initiated, which occurred before 2015 (see Section 1.3 of the Draft EIR for definition of the baseline). Comparison of historical counts from Caltrans Traffic Volumes Book for each year from 2009 through 2014 (the most current year available) shows that on the SR 267 segment next to the project site, the average daily traffic during the peak month of the year was highest in 2014 (12,900 vehicles), compared to the five years prior; therefore, the traffic counts collected were appropriate for the analysis." (FEIR, p. 3.5-163).

[50] http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch3_Air-Quality_Oct2012_Final.pdf



Estimated annual daily vehicle miles traveled based on the TRPA TransCAD Transportation Model, and average annual daily vehicle counts from a peak travel day (2nd weekend in August) of each calendar year in the Lake Tahoe Basin 1981 to 2011. Source: TRPA Transportation Department, CalTrans and NDOT



Trend in average daily winter traffic volume measured between 4 p.m. and Midnight (vehicle/day) on Presidents' Day Weekend at Highway 50 and Park Avenue, South Lake Tahoe, CA, 1981 to 2012. Note: data not collected for 1982-1986, 1990-1995, and 1996-2002 periods resulting in a decrease in confidence in trend determination. Data Source: Caltrans and TRPA

PF20-12 cont.

Our comments noted that the cumulative traffic analysis failed to consider the impacts of the proposed Brockway Campground, as it relied on modeling from two models (one by TRPA and the other, the Town of Truckee), neither of which appeared to have included Brockway Campground.[51] In response, the FEIR simply refers to Master Response 2 regarding the Brockway Campground, which then refers to Table 4-2 in the DEIR to claim the impacts had been included (FEIR, p. 3.5-163). However, while Table 4-2 may list Brockway Campground, the FEIR fails to provide any evidence that Brockway Campground traffic was included in the cumulative traffic modeling estimates. If the impacts were included, the FEIR could simply refer to the specific section of the EIR, or provide additional information from the record that supports this claim. Yet the FEIR instead refers from one section to another, and then another, none of which specifically respond to the question. Inclusion of text in a project list does not provide a substitute for an evaluation of cumulative traffic impacts.

It is reasonable to expect that most visitors to the proposed Brockway Campground would arrive on a Friday evening in the summer – during the same hours analyzed as a peak period for summer conditions in the DEIR.[52] If, for example, those 550 units are booked at full capacity (as is typical on Holidays or during peak summer times), at least 550 new vehicle trips will added to SR 267

[51] "The cumulative transportation impacts were estimated based on the Truckee and TRPA TransCAD models. However, it is unclear whether either model took into account the potential impacts of expansions at Squaw Valley. Additionally, neither model included estimates for the proposed Brockway Campground." (Labeled comment IO18-23, FEIR, p. 3.5-96).

[52] "For this Draft EIR, the summer condition is represented by a Friday afternoon peak hour in August." (DEIR, p. 10-4).

during this time (assuming only two campers per site). For example, assuming 50% of the campers arrive during the peak window, an additional 275 vehicles could be on SR 267 during the peak Friday afternoon period. Compared to the total of 636 peak vehicles in the Existing plus Project estimates (DEIR, Exhibit 10-7, p. 10-26), 275 is certainly a substantial number of vehicles to add to the roadways during peak conditions. Even if just 25% of the campers arrived during the peak period, that would still be almost 140 additional vehicles. PF20-12 cont.

3. Mitigation for traffic and transit impacts

Response to IO18-27 estimates very few people in the project will actually use transit.[53] According to the FEIR,[54] it is estimated that during the winter, only 13.5 daily trips (or 27 trip ends) will be diverted through transit. In the summertime, this drops to just 3.5 daily trips (7 trip ends). Given the total net increase in trips with the project of 3,985 trips (on a peak Sunday, DEIR, p. 10-23), clearly transit is anticipated to "mitigate" a very small number (approx. 0.7%[55]) of the new trips generated by the project. Thus, we pose the same question as we did in our DEIR comments:[56] how will this actually serve to mitigate the project's impacts? These same questions were also posed in comments from other organizations (e.g. IO41-48 and -49); FEIR responses to our comments refer to these other responses. Comment IO41-48 questioned how establishing a new Zone of Benefit will mitigate impacts (as proclaimed in the DEIR); the response acknowledges that this has yet to be defined[57] – thereby deferring mitigation to the future. IO41-49 queried how membership in the TNT/TMA will mitigate project impacts; the response provides a lengthy discussion about the purpose and activities of the TNT/TMA, but fails to actually address the question.[58] PF20-13

In addition, given so little mitigation is anticipated from this measure, we again reiterate the request for other mitigation measures to be considered. The FEIR appears to simply label the impacts "significant and unavoidable" and not consider other options to reduce those impacts.

[53] FEIR, p. 3.5-164 to 3.5-168.
[54] FEIR, p. 3.5-164 and -165.
[55] Note: 27 Daily trips equate to roughly 0.7% of the project's total of 3,985 generated trips.
[56] Labeled as comment IO18-29, FEIR, p. 3.5-101.
[57] "The specific level of transit service improvements that would be funded through establishing a new Zone of Benefit under a County Service Area has yet to be defined." (FEIR, p. 3.5-448).
[58] "The mitigation measure requiring membership in the TNT/TMA is a standard mitigation measure for large development projects in the eastern Placer County area. It is intended to ensure ongoing participation by major economic institutions in regional transit/transportation discussions, further improving transit service. The project would be required to join and maintain membership in the TNT/TMA prior to Improvement Plan approval and/or recordation of the Final Map. The TNT/TMA is dedicated to fostering public-private partnerships and resources for advocacy and promotion of innovative solutions unique to the transportation challenges of the Truckee-North Lake Tahoe Resort Triangle. The TNT/TMA serves as a discussion and advocacy forum for transit, pedestrian, biking, and roadway infrastructure designed to increase access and reduce congestion within the Resort Triangle. The TNT/TMA partners with local governments, agencies, businesses, resorts, advocacy organizations, local and federal legislators, as well as regional and state agencies to promote expansion of regional transit solutions. By joining and maintaining membership in the TNT/TMA, the project is providing funding that would be used towards enhanced transit and other forms of multimodal transportation." (FEIR, p. 3.5-448 and -449).

Also, the response to IO18-28 mischaracterizes our comments. We asked how the DEIR could conclude that the proposed transit stop improves "existing" transit service when there is no 'existing' transit need for the MVWPSP project.[59] In other words, there is nothing to "improve." Further, the FEIR speculates that the additional three minutes associated with adding the MVWPSP bus stop[60] would not be "expected to" degrade service, and that any increase in travel times would be "modest."[61] However, the FEIR presents no information, such as passenger surveys, to support the assumption that the additional delay would not affect existing transit use. Additional delays may discourage existing passengers such that they opt to drive instead. PF20-13 cont.

The FEIR also appears to imply that because the project is not one large resort, the applicant cannot include additional mitigation (beyond membership in the TMA).[62] Because regional traffic and transit systems are just that – *regional* – it is far more effective to plan for the impacts of the project now, rather than attempt to mitigate the regional impacts of individual home or commercial projects in the future. The mitigation and monitoring plan in the FEIR clearly relies on future cooperation through homeowners associations and other means.

A. Contributions to transit systems:

The DEIR proposes two mitigation measures which it concludes mitigate transit impacts to less-than-significant:

> "Mitigation measures 10-5a (Payment of Annual Transit Fees) and 10-5b (Join and Maintain Membership in the TNT/TMA) would determine with specificity the project's fair-share annual contribution to ongoing operational transit services and improvements, and would require ongoing participation by the project's commercial and homeowner associations in TNT/TMA to address and improve transit and transportation conditions into the future. These measures would offset the project demand for additional transit services, thereby reducing the impact on transit to a less-than-significant level." (DEIR, p. 10-33).

The DEIR does not sufficiently estimate the potential impact to transit systems in the first place (for example, the additional three minutes added by the new transit stop may affect ridership, as noted previously), therefore it is impossible to determine whether they can be mitigated to less than significant. In addition, the

[59] "The DEIR states that 'The proposed project would enhance existing transit service on SR 267 with construction of a new bus shelter within the MVWPSP near SR 267.' (DEIR, p. 10-33). However, it is unclear how adding a new bus shelter enhances 'existing' transit service. Currently, there are no homes or recreational attractions that require existing transit service to stop where the future bus shelter would be. Therefore, it is not correct to claim enhancement of 'existing services' where no existing services exist. In fact, the addition of a new bus stop is likely to degrade existing transit services." (Labeled as IO18-28, FEIR, p. 3.5-100).

[60] "In sum, serving this stop may add 3 minutes to the one-way running time of the TART 267 Route." (FEIR, p. 3.5-167).

[61] "Bus schedules may have to be adjusted, but would be evaluated by TART and are not expected to result in a degradation of service… Because the project would result in only one additional stop, any increase in the travel time of the transit route would be modest." (FEIR, p. 3.5-167).

[62] Response to IO41-39: "The project is not a resort that would be controlled by the project applicant following construction and allowing for the implementation of measures such as discounted transportation to the Amtrak station or transit passes. Recruitment of transit riders would likely occur (or occur more effectively) through other efforts in place from the TMA to publicize transit opportunities." (FEIR, p. 3.5-444).

DEIR provided no information showing how the payment of annual transit fees and membership in the TNT/TMA will ensure mitigation; the FEIR did not correct this deficiency. Simply paying a fee does not meet the CEQA requirement to show how that fee will result in mitigation.[63]

B. Fair Share of Transit Costs:

PF20-13 cont.

Our DEIR comments stated that: "The EIR should clearly analyze how residents and guests of the new MVWPSP project area will contribute their fair share toward transit. Existing Tahoe Basin and Martis Valley residents should not bear any additional burden of funding transit in order to support the new development." The FEIR's response (IO18-30)[64] refers to the mitigation measures for the payment of annual transit fees (10-5a) and joining and maintain membership in the TNT/TMA (10-5b). However, as noted previously, the EIR does not identify how these measures will actually ensure mitigation. Without this information, it is impossible to assess what the fair share contribution should be.

In addition, we questioned how the impacts from day-use drivers in the Basin would be addressed (labeled as comment O18-30). The FEIR refers to the response to O18-29, which does not evaluate or disclose how day-traffic from MVWPSP would be mitigated by the proposed mitigation measures.

4. Brockway Campground

PF20-14

Numerous comments were made regarding the cumulative impacts of the MVWPSP and Brockway Campground. In response, the FEIR asserts that the projects are not connected,[65] that "each of the two projects can be implemented without the other," and that "If one project is approved, then that approval would create no 'bureaucratic momentum' with respect to the other proposal."[66] The facts show otherwise.

[63] http://www.sierrawatch.org/wp-content/uploads/2015-SMW-Letter-to-M-Krach-re-Village-at-Squaw-Specific-Plan-DEIR-07-16-2015.pdf; p. 51-52

[64] "The comment recommends that the EIR address the MVWPSP's fair share contribution toward transit. Mitigation Measure 10-5a (Payment of Annual Transit Fees) and Mitigation Measure 10-5b (Join and Maintain Membership in the TNT/TMA) are included in the EIR, which would include a determination of the project's fair-share annual contribution to ongoing operational transit services and improvements, and would require ongoing participation by the project's commercial and homeowner associations in the Truckee-North Tahoe Transportation Management Association (TNT/TMA) to address and improve transit and transportation conditions into the future." (FEIR, p. 3.5-168).

[65] "First, either of these proposals can be constructed on its own. Neither project depends on the other. Put another way, if the County and the Tahoe Regional Planning Agency do not approve the Brockway Campground, then that decision will have no bearing on whether the MVWPSP project is able to proceed. The reverse is also true; the fate of the MVWPSP project does not affect the viability of the Brockway Campground." (FEIR, p. 3-7).

[66] "The comment asserts that the MVWPSP and the Brockway Campground proposal are connected notwithstanding the fact that the MVWPSP project will be implemented with or without the Brockway Campground. However, the fact that each of the two projects can be implemented without the other demonstrates that each proposal has independent utility, by which each project can be subject to a separate EIR under CEQA. As stated under Section 15165 of the State CEQA Guidelines, where one project is one of several similar projects of a public agency, but is not deemed a part of the larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect. The two projects are separately proposed. They involve different

Projects are connected:

Although the MVWPSP may not rely upon the Brockway Campground (Campground) for approval, the Campground may rely on the MVWPSP for approval.

1. The Brockway Campground application files specifically note sewer facilities offside (on the MVWPSP project area). If the MVWPSP is not approved, then it would likely cost the developers of the Campground significantly more to install a sewer line the full distance that it would need to go to connect to where the MVWPSP will connect it to. We question whether such a cost would be undertaken if the infrastructure for MVWPSP isn't built. In addition, the Campground application states: "Sewage will be collected from restrooms, amenities and camper sites and will drain by gravity to the low point of the site where it will be conveyed to a septic system located off site, outside of the Tahoe Basin. The sewage collection system will contemplate a possible future connection to sewer infrastructure outside and adjacent to the project site." (p. 7) [emphasis added]. Note the figure from the Brockway Campground application below states: "Sewer to be taking to septic system outside the Tahoe Basin" (see close-up image of area under circle following larger map). This clearly suggests that the Campground aims to connect to MVWPSP facilities. No alternatives are included in the Campground application. Further, the EIR lists Brockway Campground as one of the cumulative projects that would contribute flows to the TRI.[67] Images from the application (p. 7) are included below.[68] It is also reasonable to anticipate that installing energy and natural gas infrastructure for the MVWPSP would provide lines for connecting the Campground's utilities. The projects are not only connected, but the MVWPSP will develop infrastructure (i.e. the sewer line connection) that is likely to induce growth where the Brockway Campground project is proposed. CEQA requires the growth-inducing impacts of the project be fully disclosed.[69]

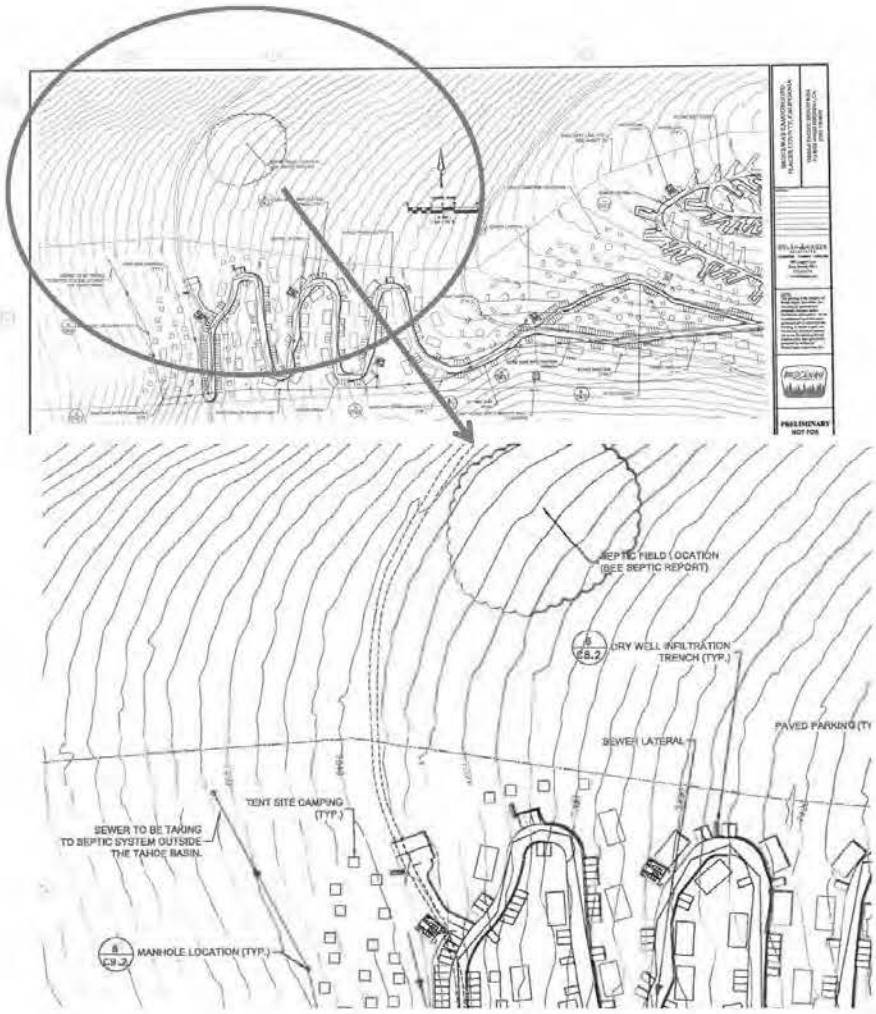
PF20-14 cont.

uses. They are located in the same region, but not on the same sites. They would be implemented under separate timelines. They do not share road networks (except for the MVWPSP's secondary EVA) or utilities. If one project is approved, then that approval would create no "bureaucratic momentum" with respect to the other proposal. (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 396.) The Brockway Campground proposal and other related projects that may contribute to cumulative effects were considered throughout the cumulative impact analyses of the Draft EIR." See Master Response 2 regarding the Brockway Campground. (Response to Comment IO41-4, FEIR, p. 3.5-426).

[67] "Cumulative projects that would contribute flows that could affect the TRI below the TSD outfall include Joerger Ranch, North Highlands II, Northstar Mountain Master Plan, Martis Camp, Brockway Campground, Homewood Mountain Master Plan, and projects in Squaw Valley and Alpine Meadows." (DEIR, p. 16-31).

[68] http://www.placer.ca.gov/~/media/cdr/planning/brockwaycampground/project%20description.pdf?la=en

[69] CEQA: **15126.2** (d) Growth-Inducing Impact of the Proposed Project. Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must



PF20-14 cont.

not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

2. We also questioned the cumulative scenic impacts of the projects. For example, when one compares the MVWPSP layout to the Campground layout, it appears that the trees that will have to be removed for roadways and development of the Campground are likely to 'open up' views between Lake Tahoe and the MVWPSP structures, resulting in cumulative scenic impacts to views from the Tahoe Basin. The FEIR fails to respond to this question (labeled IO18-39), instead reasserting that the DEIR evaluated the impacts and referring to Master Response 2, where these comments are not addressed.[70] Our DEIR comments included the following rough map,[71] comparing the MVWPSP layout to the proposed Campground layout.[72]

PF20-14 cont.

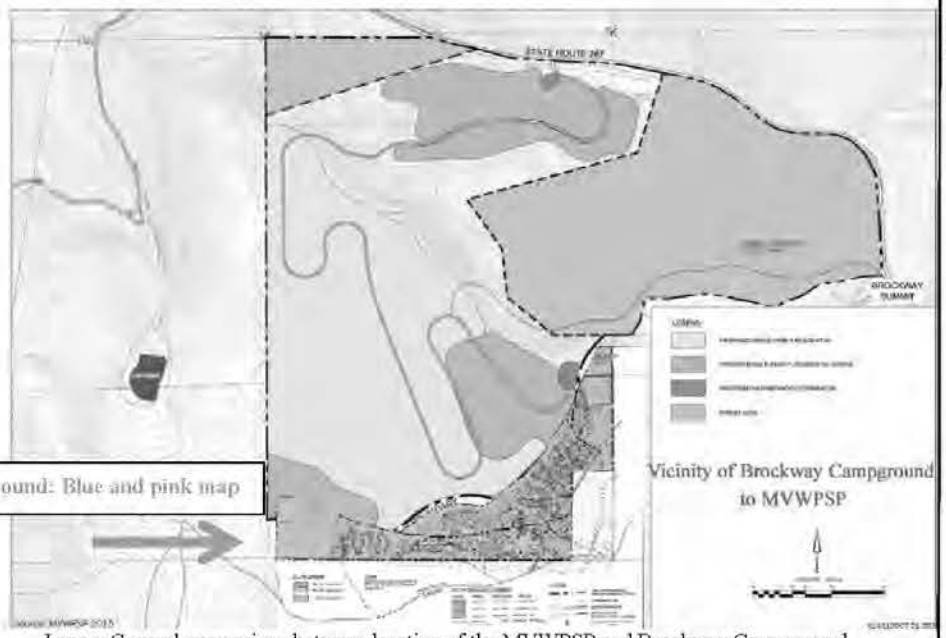


Image: General comparison between location of the MVWPSP and Brockway Campground (Figure C11.2 from the Campground application was merged with the MVWPSP figure).

Bureaucratic Momentum:

Currently, both projects are proposed in an undeveloped forested area. They are clearly not "infill" or close to existing infrastructure. In fact, the deletion of the Placer County policy 1.A.1,[73] which promotes in-fill development, from the Specific Plan language

[70] "The comment states that the cumulative impacts of the proposed Brockway Campground and Martis Valley West Area Plan must be fully assessed. The Draft EIR includes an assessment of cumulative impacts as outlined in Section 4.2, Cumulative Impact Analysis Methodology... The analyses of cumulative effects are included in the separate technical chapters of the Draft EIR. See Master Response 2 regarding the Brockway Campground proposal." (FEIR, p. 3.5-170).

[71] Image from our DEIR comments, included in the FEIR on p. 3.5-108.

[72] http://www.trpa.org/wp-content/uploads/APPLICATION-PHOTOS-GRAPHICS-PLANS.pdf; (Figure C11.2 on p. 7)

[73] The FEIR deletes the following policy: "The County will promote efficient use of land and natural resources and will encourage 'in-fill' development." (FEIR, p. 2-8)

reflects this fact. However, once the MVWPSP is approved, it will become "nearby" or "adjacent" development to the Campground site, making the approval of the Campground easier to justify as it would no longer represent extensive development of *undeveloped pristine forest land*. In fact, Placer County staff have already seemingly downplayed the significance of the development of the MVWPSP's now forested conditions by stating that it is "close to" other development (Stacy Wydra, comments to the North Tahoe Regional Advisory Council [NTRAC] on 5/12/2016). In this case, the reference was to Northstar developments; an NTRAC member pointed out that this was confusing because there are recreation-zoned lands that are not developed beyond recreation between Northstar and the MVSPSP project area (meaning it is not correct to say it is near existing development). In response, Placer County staff stated the: "characteristics of the site contain development;" which fails to address the issue, let alone appears to be a meaningless statement. PF20-14 cont.

Therefore, it is also reasonably foreseeable that once the MVSPSP has been approved, the Campground will then be viewed as "near or adjacent to" other development as well, making approval of the Campground far more likely. This is how urban sprawl happens, and reflects a clear example of piecemealing development, which is not allowed by CEQA.

We refer back to our comments, as well as those submitted by numerous other public organizations and citizens, regarding the need to evaluate the cumulative impacts of the MVWPSP and the Brockway Campground.

5. Impacts to Emergency Vehicles on 267

The DEIR examines the following two criteria related to wildfire threats and evacuation (DEIR, p. 18-13):

> " || impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan;
>
> || expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;"

PF20-15

The DEIR concludes both impacts are less than significant for the following reasons:

> "Because the project would include two emergency access points in addition to the primary access road, adequate emergency ingress or egress would be provided. This impact is less than significant." (DEIR, p. 18-19).
>
> "Because the project would develop an emergency evacuation plan as part of the FPP, provide adequate emergency vehicle access and points of ingress and egress in a manner that meets NFD requirements (Shadowens, pers. comm., 2015a), and result in operational traffic that, at buildout, would represent an incremental increase insufficient to interfere with the SR 267 Emergency Evacuation Plan, the project's impact relative to emergency evacuation is less than significant." (DEIR, p. 18-20).

Neither of the DEIR's discussion points actually address the project's impacts on emergency evacuation and access on SR 267, as requested in our comments.[74] The FEIR refers to Master Response 9, however, the response does not address how the project would impact evacuations and emergency access on SR 267. This is not the same issue as to whether the project will cut off or modify any evacuation routes (the focus of the response[75]). At 5/12/2016 NTRAC meeting, the applicant's representatives confirmed that the project's evacuation 'analysis' only addresses people and vehicles *within the project area*, leaving the impacts on SR 267 for Caltrans to deal with. Master Response 9 also refers to a Fire Protection Plan,[76] however once again, this only focuses on emergency access standards, routes, and other factors *on the project site*. Even where the latter section discusses the potential to interfere with the Evacuation Plan for SR 267, the EIR does not explain how the project can have significant and unavoidable impacts on transportation, yet have less than significant impacts on emergency evacuation and access on SR 267. PF20-15 cont.

In addition, a recent court ruling related to the Homewood Mountain Resort reflects the importance of assessing the impacts of the project on the capacity of emergency evacuation routes. Although released on 12/22/2015 – the same day public comments on the FEIR were due – we include the following information for the record and to reiterate comments we have previously made.

The Third District Court of Appeals of California issued a ruling on 12/22/2015 related to the Clean Energy Committee's (CEC's) challenge of the Homewood Village Resort's EIR.[77] One of the most notable outcomes is the Court's decision regarding emergency evacuation:

> "There are two components to the wildfire evacuation risk – evacuation by residents, workers, and visitors, and the impact of that evacuation on access by emergency entities responding to wildfire. The EIR fails to evaluate both."
>
> "... evacuation [of people from the project area] could also impact the environment by impeding emergency responders who might otherwise be able to prevent the spread of wildfire..."
>
> "[The EIR] failed to identify the capacity of SR 89 or connecting roads to accommodate the evacuation of people, including additional people from the project."

---

[74] "The MVWPSP will generate 'significant and unavoidable' transportation impacts (i.e. more congestion) to SR 267, including the segment from Brockway Summit to the SR 267/SR 28 intersection in Kings Beach. The DEIR also notes that even if SR 267 were to be widened, it would not likely occur before construction of the MVWPSP project began. This will create additional delays for emergency vehicles on SR 267... [and] interfere with emergency evacuations, which may involve residents and visitors to North Lake Tahoe, those within the MVWPSP project area and Northstar, and guests at the proposed Brockway Campground." (FEIR, p. 3.5-103 and -104).

[75] "Impact 18-4 discusses interference with an emergency evacuation plan. As discussed therein, the project would not cut off or otherwise modify any existing evacuation routes." (FEIR, p. 3-37)

[76] "The impact discussion explains that, in accordance with Policy PSU-25, a Fire Protection Plan (FPP) would be prepared for the project that would identify emergency evacuation routes, emergency access road standards, standards for signs identifying evacuation routes, and a program for disseminating public safety information." (FEIR, p. 3-37).

[77] http://www.leagle.com/decision/In%20CACO%2020151222052/CALIFORNIA%20CLEAN%20ENERGY%20COMMITTEE%20v.%20COUNTY%20OF%20PLACER

The CEC noted that analyzing this impact must involve the evaluation of "*the total number of residents, businesses and tourists that can be safely evacuated from the West Shore, without impeding emergency vehicle access, in the event of wildfire, earthquake or seiche and evaluate the cumulative impact of the project on natural disaster evacuation and emergency vehicle access to the West Shore.*" The Court also pointed out that while the EIR concluded significant and unavoidable impacts to congestion on SR 89, the EIR "inexplicably" did not conclude those "*same inadequate roads to be a significant, unavoidable impact in the context of a wildfire requiring emergency evacuation.*"[78]

PF20-15 cont.

The Court directed Placer County to comply with CEQA, which will require addressing the failure to identify, describe, and analyze the wildfire evacuation risk. With regards to the MVWPSP EIR, we requested the FEIR address the project's impacts on the capacity of SR 267 to evacuate people from the North Tahoe region and allow for emergency access. The FEIR fails to respond. Also similar to the Homewood case is the EIR's conclusion that there will be significant and unavoidable traffic impacts, yet the EIR "inexplicably" concludes a less than significant impact to interference with emergency evacuation. It appears the FEIR skirts the question by determining significance based on a very narrow focus on whether there is an access route for people within the MVWPSP project area to exit the project area on to SR 267, thereby ignoring the impacts of those people *on* SR 267.

In addition to the reasonable conclusion that significant and unavoidable traffic impacts translate to significant and unavoidable impacts on evacuation plans, it is also worth stepping back and considering the bigger picture. This project will place 1000's of people in extremely dangerous locations, where they could lose not only their property, but their lives to wildfire. Second, placing more people in fire-prone areas takes away resources from fighting fires elsewhere, and fire-fighting resources are already lacking (e.g. "'Some people are building homes in fire prone spots. It changes the way we fight fires, when we're having to send more resources in to protect these homes,' said Mike Taormina, South Lake Tahoe fire wildland operations coordinator.").[79] Third, developing in forested areas also increases the threats to firefighters, as they are now tasked with having to defend homes from a fire in an area that would have been less dangerous to deal with when only a forest is burning.[80] Fourth, development in this forested area makes it far more difficult, if not impossible, for land managers to use prescribed ecological fire to ensure forest health and reduce the threats of catastrophic wildfire.[81] All in all, this development is a dangerous proposal that will place the lives of 1,000's of people and firefighters in danger (and perhaps 10's of 1,000's when peak resident and visitor traffic periods are considered). We request Placer County consider whether this is a desirable and responsible land planning approach.

[78] Note: "This opinion has not been certified for publication or ordered published for purposes of rule 8.1115."

[79] http://www.laketahoenews.net/2016/05/threat-of-fire-ignites-concern-in-tahoe-basin/

[80] "Fire spread and intensity was reduced in this area primarily due to USFS and CTC urban lot hazard fuel treatments, reduced concentration of houses and safer access by firefighters." http://www.cnpssd.org/fire/angorafireusfsfullreport.pdf

[81] M. P. North, S. L. Stephens, B. M. Collins, J. K. Agee, G. Aplet, J. F. Franklin, P. Z. Fulé. Reform Forest Fire management. *Science*. 18 September 2015. VOL 349, Issue 6254, p. 1280-1281.

6. Water Supply

We are concerned about the project's individual and cumulative impacts on water supply. While we reference comments submitted by Sierra Watch for detailed concerns, we want to emphasize the following two points:

First, the applicant told the NTRAC members and public (at the 5/12/2016 meeting) that the project will create a "new" water supply for the area. We would like to clarify that this is technically incorrect. The project will not bring "new" water to the area; it will simply add wells to draw from water already part of the ecosystem in the area. Further, as to implications that this 'new' water source will benefit firefighters, we note that the fire risk and increased danger from adding homes to this area far outweigh any benefits from having additional wells to draw water from. As it currently stands, if a fire were to occur on this parcel, firefighters can focus efforts on creating containment lines around the area and ensuring the highways remain safe and open, instead of having to put themselves in greater danger by trying to protect homes from raging flames. PF20-16

Second, as noted in our comments on the DEIR,[82] the water assessment only analyzed four-years to represent presumed "long term" drought conditions with regards to supply. We presented evidence that droughts have already lasted longer than four years, as well as references showing that we are currently in the most severe drought recorded in over a century. Four years does not provide for an adequate analysis of a "long term" impact. It would behoove Placer County to fail to consider how water will be supplied to existing uses, let alone new uses, in a true long term drought situation.

7. Scenic Impacts

Our DEIR comments noted the special significance of scenic resources of the Tahoe Basin, providing as evidence references to numerous Tahoe Basin documents, including the TRPA Compact, Goals and Policies, and the study behind the adoption of TRPA's scenic threshold standards (see Comment IO18-41, FEIR, p. 3.5-109 to -110). The FEIR dismisses this information: "[The] specific TRPA documents cited in the comment do not apply to the project area."[83] We disagree. CEQA requires the project's impacts on the environment be disclosed, and TRPA's rules and standards specifically identify the Basin's scenic resources as an important value of the Lake Tahoe Basin, including the "edges between sky and ridgetops…"[84] Thus, it is necessary for the EIR to evaluate and disclose the impacts to these resources, as defined by documents and regulations associated with TRPA. In addition, we are concerned with new ridgeline development such as this around the Tahoe Basin, and the approval of the proposed project will set a precedent that may allow further degradation of Tahoe's scenic resources. PF20-17

The Response to Comment IO18-41 also asserts that the DEIR considered scenic impacts in the context of each view:

[82] "One glaring problem with the water supply assessment is that the evaluation of 'long term' impacts is based on just *four* years." (Labeled as comment IO18-35, FEIR, p. 3.5-104).
[83] FEIR, p. 3.5-171.
[84] *Environmental Impact Statement for the Establishment of Environmental Threshold Carrying Capacities*, Tahoe Regional Planning Agency. May 1982. (p. 44-45). As referenced in our DEIR comments.

"On page 9-32, the Draft EIR also explains how the impact analysis considered the context of each view when determining if visual changes would result in a significant effect, stating that:

> "In determining the extent and implications of the visual changes, consideration was given to the following factors for each of the significance criteria listed above:
>
> existing visual qualities of the affected environment and specific changes to its visual character and qualities;
>
> the visual context of the affected environment;
>
> the extent to which the affected environment contains places or features that provide unique visual experiences or that have been designated in plans and policies for protection or special consideration; and
>
> the sensitivity of viewers, access of viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the project-related changes."

The Draft EIR analyzes the significance of each impact with consideration given to the context of the visual changes in the Tahoe Basin, including a separate analysis of the project's effects on scenic vistas from the Tahoe Basin (pages 9-33 through 9-37). Because the Draft EIR appropriately considers the context of the Lake Tahoe Basin, including the existing visual quality and the sensitivity of viewers to change, when determining the significance of visual changes that could be viewed from the Lake Tahoe Basin, the analysis is adequate as provided." (Response to Comment IO18-41, FEIR, pl. 3.5-171).

However, the EIR does not include separate significance criteria to evaluate the impacts to viewers within the Lake Tahoe Basin that will view the project area from both developed and undeveloped areas (like mountain peaks and the Tahoe Rim Trail).[85] Without a significance finding, adequate mitigation cannot be determined. As TRPA's documents show, scenic quality is valued especially high in the Lake Tahoe Basin (and as a result, includes additional protections through the TRPA Bistate Compact). As noted in our comments regarding night sky impacts from light pollution (discussed below), the FEIR acknowledges that lights will be viewable from other areas of recreational and scenic value around the Tahoe Basin, yet still concludes less than significant impacts without having considered unique criteria for the Lake Tahoe Basin.

PF20-17 cont.

A. Screening by vegetation:

PF20-18

The FEIR relies heavily on screening by existing trees to conclude less than significant impacts to scenic resources from the Tahoe Basin.[86] However, the FEIR is careful to frequently focus only on trees *within the project area*, analyzing only the

[85] "Buildings that are not behind a topographic feature that completely removes them from viewpoints around the lake will likely be viewable from numerous locations in the Basin, and the impacts to night sky will be even greater as light pollution from the structures, associated streetlights, and vehicle headlights can be seen from farther distances (noted below) and will contribute to ever-increasing sky glow in the area." (Labeled as Comment IO18-42, FEIR, p. 3.5-110).

[86] "Similarly, when discussing potential nighttime effects of the project, page 9-46 of the Draft EIR explains that lighting from the project would be blocked by the ridge between the West Parcel development area and Lake Tahoe and by existing trees." (FEIR, p. 3-12).

trees to be removed for the MVWPSP[87] and defensible space[88] on the project area. For example, the FEIR states that trees would not be thinned outside of the project area *as part of the Project*.[89] There is no acknowledgement that trees will be removed as part of the adjacent Brockway Campground development, nor as a result of likely future thinning efforts by the USFS on adjacent publicly-owned parcels due to extreme fire danger (in fact, the FEIR avoids this consideration again by focusing solely *on the project area*).[90] The most recent fire and fuels plan for the Basin identifies 'planned' and 'to be considered' thinning projects in the area.[91] In fact, although detailed project plans are available for the Brockway Campground,[92] the FEIR claims that the cumulative effects of other projects "cannot be known with specificity."[93] This exclusion of tree removal also infects the expert reports and peer-review results,[94] since expert analyses and peer reviews only examined visibility impacts associated with the MVWPSP (not reasonably foreseeable tree removal on adjacent parcels). Thus, potential cumulative impacts from Brockway Campground and future USFS thinning on adjacent parcels were not considered as part of the EIR's scenic studies, yet are likely to have a direct, significant impact to views from the Tahoe Basin. PF20-18 cont.

B. Light pollution impacts to night sky:

In our DEIR comments, we stated extensive concerns regarding the impacts of the project on night sky views from around the Lake Tahoe Basin. Viewing areas include developed areas, recreation areas, and high elevation mountain trails and peaks. In addition, we noted that tree removal associated with the proposed Brockway PF20-19

[87] "...the visual simulation methodology... consisted of creating a model for trees on and around the site, removing all trees planned for removal to accommodate buildings and roads, and conservatively assuming less than 50 percent visibility for the remainder... the simulations portrayed the effects of 100 percent tree removal for houses and roads." (FEIR, p. 3.5-190). [Emphasis added].

[88] "Within the project area, much of the vegetation up to 10 feet from the ground surface would be removed for fuel maintenance..." (FEIR, p. 3.5-190).

[89] "Trees outside of the project area would not be thinned as part of the MVWPSP..." (FEIR, p. 3.5-191). [Emphasis added].
"The determination of viewpoints from which to prepare the photo simulations was based on an extensive visual profile study to determine from which surrounding locations views onto the project site might be visible, and not completely blocked by existing topography or vegetation that would not be subject to removal by the project." (FEIR, p. 3-12). [Emphasis added].

[90] "This area would not be subject to fuel maintenance as part of the project, so the trees closest to Fibreboard Freeway would not be thinned. Therefore, there would not be an effect on the analysis." (FEIR, p. 3.5-176).

[91] Lake Tahoe Basin: Multi-Jurisdictional Fuel Reduction and Wildfire Prevention Strategy (August 2014).. http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3812893.pdf: see Figure 14, p. 34.

[92] http://www.placer.ca.gov/departments/communitydevelopment/planning/brockwaycampground

[93] "Where the Draft EIR acknowledges that the cumulative effects of past, present, and future projects—though based on best available information and good-faith analysis—cannot be known with specificity, the assessment goes on to provide analysis and evidence from the project-specific environmental review and reasonably foreseeable cumulative projects to support the cumulative impact conclusions and the project's contribution to cumulative conditions... However, the Brockway Campground Project is a separate proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County..." (FEIR, p. 3.5-191).

[94] "The daytime and nighttime visual simulations were peer-reviewed by Field of Vision, an independent firm with technical expertise in visual simulations and visual impact assessment..." (FEIR, p. 3-14).

Campground, as well as thinning on nearby USFS lands, may increase the day and nighttime visibility of the project area. The impacts of tree removal adjacent to the project area are still not evaluated (more below).

1) Impacts to views from high elevation locations, including Tahoe Rim Trail:

The FEIR acknowledges that the night lighting from the project area will be viewable from other such locations such as Marlette Peak and South Camp Peak, but then dismisses these impacts as insignificant via speculation that they will not be 'discernable' at these distances (although what this means with regards to light pollution or how it provides for assessment of significance is unclear),[95] that viewers will not be able to distinguish between lights from lakeshore communities versus other mountain communities,[96] and that these views encompass a wide angle[97] - although how this latter statement affects a viewer's ability to see night lighting is also not explained. For example, it is unclear how light pollution will be less visible because an area is viewed with a "wider angle." PF20-19 cont.

However, not only does the FEIR fail to evaluate these impacts, but this conclusion also defies the experience of anyone who has ever looked across Lake Tahoe at night. Lake Tahoe is approximately 22 miles long and 12 miles wide and night time lighting can be seen across the Lake from any direction. In addition, contrary to the FEIR's conclusion, the source and type of lighting is 'distinctive;' it is easy to tell what lighting is near the shoreline, part way up the side of mountains, or even on the top of mountains (the view of Squaw Valley's "High Camp" from Spooner Summit is an obvious example of this latter impact).

2) Impacts to Recreation Areas:

Although, as noted throughout our DEIR and FEIR comments, we do not believe the EIR has adequately examined the impacts to daytime viewing from other locations (e.g. the Tahoe Rim Trail), we focus our comments here on the night time light pollution.

Lights from the project area will be viewable from numerous other high elevation areas in the Tahoe Basin, including portions of the Tahoe Rim Trail. As noted above, the FEIR acknowledges this impact. However, in addition to dismissing the impacts through speculative terms about distance and other factors, the FEIR also takes another odd approach in an attempt to seemingly minimize such impacts: the FEIR states that light pollution is less likely to harm the views of hikers or campers on the Tahoe Rim Trail and other recreational areas because they will be using headlamps, and this will presumably interfere with or reduce

[95] "As shown in these profiles, only at a substantial distance is the project site visible from portions of the Tahoe Rim Trail. For example, the site can be seen from General Creek, Marlette Peak, and South Camp Peak, but these viewpoints are over 19, 11, and 17 miles, respectively, from the MVWPSP site. At these distances, the proposed project would not be discernable." (FEIR, p. 3-13)

[96] "... at night, and at these distances, any lights visible from the project site would be difficult to differentiate from lights within the lakeshore and other mountain communities." (FEIR, p. 3.5-175).

[97] "In addition, views from these distances would encompass a wide angle, so that the lake and surrounding hillsides and forest would be within the viewer's sights." (FEIR, p. 3.5-175).

their ability to see light from the project area.[98] No evidence of this impact was presented.

In this case, logic again prevails. It is not difficult to be aware that when people are hiking or camping along the Tahoe Rim Trail, or on mountain peaks around the Basin in the dark, they are likely very interested in viewing the night sky. While someone may use a headlamp to set up a campsite, or retrieve something from a backpack, this is a short term use. It makes little sense to suggest that the impacts of night lighting are somehow reduced because a camper may use their headlamp for a few minutes. If the EIR wants to rely on such a claim to mitigate impacts, it must include evidence (e.g. surveys of TRT hikers and campers) showing that additional light pollution will not harm their recreation and scenic experience. As it stands, this claim appears to be yet another opinion included in an attempt to lessen the impact (and avoid mitigation for) what is anticipated to be a significant impact to nighttime views from other high-elevation locations. PF20-19 cont.

Because night sky impacts (those that are actually acknowledged in the FEIR), are incorrectly written off as "less than significant" or "not substantial"[99] based on speculation or vague statements that are not supported by evidence or unclear, additional mitigation measures to reduce night sky impacts to viewpoints in the Tahoe Basin have not even been considered.[100]

3) Impacts from tree removal associated with the Brockway Campground:

As noted previously, the removal of trees offsite which may now provide screening for the MVWPSP project area is likely to reduce screening and thereby increase the visual impacts of the project on both night and daytime views. In addition, it is reasonable to assume that the USFS will at some point thin the federal land they manage in the project area, however the impacts of this have also not been addressed.

As stated in our DEIR comments,[101] and regardless of whether Brockway Campground is legally considered 'connected' to this project, the cumulative

[98] "Further, the Tahoe Rim Trail is a recreational facility that is used primarily during the day. Any recreation at night would require individual light sources, which would limit visibility of other external light sources." (FEIR, p. 3-12).;
"Regarding nighttime views, the Tahoe Rim Trail is used primarily in the daytime, as any nighttime use would require auxiliary lighting, e.g., headlamp or flashlight, which would limit a recreational users' sight to a single point of view. Additionally, at night, and at these distances, any lights visible from the project site would be difficult to differentiate from lights within the lakeshore and other mountain communities." (FEIR, p. 3.5-175).

[99] "For the above reasons, the EIR concluded that lighting from the project site would not result in a substantial amount of light that would adversely affect views in the area." (FEIR, p. 3.5-192).

[100] "Therefore, the mitigation measures proposed in the comment to reduce impacts on the Lake Tahoe Basin are not necessary or required." (FEIR, p. 3.5-193).

[101] "In addition, although the DEIR states the cumulative impacts from Brockway Campground cannot be assessed because it is still in the "planning stage," as discussed previously, the Campground's application includes a rather detailed project layout[101] that is quite similar to the conceptual plan of the MVWPSP represented by Exhibit 9-26. This certainly provides enough information for the EIR to evaluate the potential cumulative impacts with the Campground. Not only will the Campground remove additional trees

impacts of tree removal for the Campground are reasonably foreseeable. In fact, our DEIR comments included the pairing of the project layouts for both MVWPSP and the Campground. At a glance, when the project layouts are placed next to each other (as illustrated previously), it appears that tree removal for the Campground will open up views between Lake Tahoe and MVWPSP buildings (from both lower and higher elevation viewpoints in the Tahoe Basin). The EIR must evaluate these potential cumulative impacts.

4) Light from Headlights

PF20-19 cont.

Our DEIR comments noted the need to evaluate the impacts of headlights on night sky.[102] The FEIR's response asserts that headlights would be less visible because they'd be blocked by existing trees.[103] However, as noted above, those 'existing trees' may be removed to accommodate the Brockway Campground. In addition, the response also fails to address the impacts from sloped roadways. In sloped areas, light from vehicles driving uphill will shine much higher than on a flat roadway. Conversely, where roadways are higher than surrounding areas headlights from vehicles may also be viewable from lower elevations. The FEIR includes no assessment of roadway angles and design, and how this may impact the extent of light pollution caused by headlights. This same failure infects the analysis of sky glow impacts, where impacts of driving on sloped roadways are also not addressed.[104]

5) Light poles

In our DEIR comments, we suggested using light poles to help assess the potential night light impacts from the project.[105] The FEIR dismisses this recommendation, stating that it would not provide the most accurate light assessment.[106] However, as the FEIR has claimed 'conservative' analyses elsewhere (i.e. light from homes

that may currently provide some screening, but it will also result in additional light sources on the ridgeline (including the project structures and headlights)." (Labeled as comment IO18-066, FEIR, p. 3.5-127).

[102] "Not only will the Campground remove additional trees that may currently provide some screening, but it will also result in additional light sources on the ridgeline (including the project structures and headlights)." (Labeled as comment IO18-066, FEIR, p. 3.5-127).

[103] "The comment addresses lighting effects from headlights. Due to their lower height, headlights would be less visible than residential lighting from the surrounding area, would be blocked by existing trees and the existing ridge, in relation to the Basin. Trees would also block headlights on the Martis Valley side, although headlights may be intermittently visible due to little topographic barrier..." (Labeled as comment IO18-069, FEIR, p. 3.5-128)

[104] "Also, existing tree cover, with many trees up to 70-feet tall, would absorb or block much of the light, preventing it from bouncing back to the sky... For the above reasons, the EIR concluded that lighting from the project site would not result in a substantial amount of light that would adversely affect views in the area". (FEIR, p. 3.5-192).

[105] Labeled as comment IO18-73, FEIR, p. 3.5-131.

[106] "IO18-73 The comment suggests story pole lights as an alternative method for determining night-time impact. Story pole lighting would mark the main boundaries of the project at points currently accessible by road but would not provide the most accurate and complete effect of the project. It would not depict the types of lighting used, nor would it represent the fact that the majority of light sources would be from the insides of houses. Nor, since not all areas of the project are currently accessible, could it replicate all placement of lights in all houses at the same level of completion as the computer-generated photosimulations." (FEIR, p. 3.5-193).

is simulated assuming lights are on in all faces of the buildings),[107] the use of light poles would notably represent a conservative method of evaluating where lights may be seen from. This approach could be used to assess which viewpoints require additional study. Instead, the FEIR provides no analysis to support its assertion that light impacts will not be significant from the Tahoe Basin (even as it recognizes that night lights will be viewable from several locations not analyzed in the DEIR, as noted previously).

PF20-19 cont.

6) Consultation with other organizations:

The FEIR frequently refers to consultation with other organizations as purported support for the viewpoints used in the visual simulation.[108] However, the three conservation-oriented organizations often noted in these statements (the League to Save Lake Tahoe, Sierra Watch, and Mountain Area Preservation Foundation) all critiqued the inadequate visual impact analysis in the DEIR, noting insufficient viewpoints from the Tahoe Basin as a failure in the analysis.[109] The responses in the FEIR generally refer to Master Response 4 and the additional viewpoints included in the FEIR (explained in response to IO18-52). As noted previously in our comments, the FEIR's responses still fail to address several technical inadequacies and the significance of the impact to night time views from numerous locations throughout the Tahoe Basin.

8. Mitigation Measures

PF20-20

As noted throughout our DEIR and FEIR comments, technical deficiencies in the EIR result in a failure to adequately analyze and disclose impacts, and/or failure to determine significant impacts, which prevents the FEIR from considering adequate mitigation. In some cases, impacts are not even considered (i.e. impacts to night sky from other Lake Tahoe viewing points); in others, the potential *maximum* impacts have not been analyzed (e.g. traffic). Where the EIR concludes no impacts, or less than significant impacts, the EIR proposes no additional mitigation.[110] As a result, the public and decision-makers are deprived of examining what additional mitigation options are available and the opportunity to mitigate many local and regional impacts will be lost. For example:

---

[107] "To provide a conservative analysis, the photosimulations portray lighting from all faces of all floors of all proposed buildings. The photosimulations account for the types of lighting and the way it would be reflected in real life conditions. Thus, the photosimulations illustrate the most accurate and complete depiction of potential lighting conditions." (FEIR, p. 3.5-193).

[108] E.g. "The study evaluated 44 separate viewpoints that were selected by representatives of regulatory agencies including Placer County and the Tahoe Regional Planning Agency, and environmental advocacy organizations including Sierra Watch and Mountain Area Preservation." (FEIR, p. 3-13);
"Regarding the selection of observation points, organizations and individuals from the Tahoe Basin (Placer County, MAP, Sierra Watch, League to Save Lake Tahoe, and TRPA) were involved in the selection of viewpoints and discussion of visual impacts prior to publication of the Draft EIR." (FEIR, p. 3.5-174).

[109] See comments labeled as: IO26-12 and IO41- 21, -22, -26, and -28).

[110] "IO18-81 The comment recommends additional mitigation options regarding transportation and scenic resources. Please see responses to comments IO18-26, IO18-75, IO41-26, IO41-39, and Master Response 10 regarding alternatives. The Draft EIR provides all feasible mitigation measures necessary to reduce significant impacts to less-than-significant levels. Where impacts remain significant after imposing all feasible mitigation, the impacts are identified as significant and unavoidable in the Draft EIR." (FEIR, p. 3.5-195).

- An adequate analysis of the regional transit impacts would help determine what levels of frequency, convenience, cost, etc., will improve transit ridership (as noted previously, the FEIR's mitigation will reduce less than 1% of the anticipated trips generated by the project). With this information, sufficient mitigation measures can be developed to increase the level of mitigation provided by transit;
- Local and regional transportation impacts may also be lessened through other transit options for specific destinations, such as frequent shuttle service to Northstar Mountain Resort during the winter and Lake Tahoe during the summer months; PF20-20 cont.
- As the FEIR fails to address the project's impacts on public health and safety (specifically, impacts to SR 267 as a designated evacuation route), no mitigation measures to address these impacts have been considered;
- Due to the inadequate analysis of scenic impacts (day and night time) to the Lake Tahoe Basin, mitigation options including setbacks and/or moving buildings from the highest points on the ridgeline are not considered;
- The failure to adequately examine the impacts of the project on night sky views from multiple locations throughout the Tahoe Basin, including the impacts of light pollution as viewed from both nearby and distant points (noted previously), results in little more than a cursory acknowledgement of the ability of a viewer to see the light pollution and dismissal of significance based on speculation and/or consultant opinion (e.g. see our comments above regarding headlamps and the Tahoe Rim Trail).

9. Greenhouse Gas emissions

The FEIR fails to correct the deficiencies noted in the DEIR by our comments as well as numerous other organizations. We herein incorporate the comments on the FEIR's responses regarding GHG emissions from Sierra Watch, Mountain Area Preservation, and the League to Save Lake Tahoe. We also reiterate that it is irresponsible and wasteful to develop a forest into new 2nd homes that will utilize more energy and create additional traffic, thereby causing significant increases in GHG emissions at a time when scientists, as well as the state of California, are calling for significant decreases in GHGs if we are to avoid the worst impacts of climate change. PF20-21

10. Recirculation of DEIR

The County notes in the FEIR the conditions under which recirculation of the DEIR is required. While it concludes that recirculation of the DEIR is not required, this conclusion is based on a final EIR that does not address many of our DEIR comments and those of other commenters. If the County had adequately addressed these comments it is our position that it would have met the conditions under which recirculation of the DEIR was required. As the FEIR notes, recirculation is required by CEQA when the agency adds "significant new information" to the EIR after the close of public comment period. CEQA further explains that "'significant' new information includes information showing that "(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented[;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation PF20-22

measures are adopted that reduce the impact to a level of insignificance." (*Ibid.*, subds. (a)(1), (a)(2).)" (FEIR, p. 3-2)[111].

In this case, both situations apply. First, the EIR's analysis failed to adequately address several significant impacts, including traffic, scenic, public health and safety, and cumulative impacts. A corrected EIR with proper analysis would likely result in new significant impacts not identified in the DEIR (as explained above). Second, a proper analysis is likely to generate "a substantial increase in the severity of an environmental impact" with regards to the following:

PF20-22 cont.

- Vehicle Miles Traveled and Level of Service (congestion) – for example, impacts will increase when the EIR is corrected to reflect potential maximum occupancy levels;
- Scenic views from the Lake Tahoe Basin - especially when night sky impacts from light pollution are evaluated and properly considered;
- Public health and safety – the project will add 100's more vehicles to SR 267, which is already overloaded during peak periods, increasing threats to public health and safety by impeding a primary evacuation route from the Tahoe Basin; and
- Cumulative traffic impacts – this project, combined with the Brockway Campground project, will significantly impact SR 267, even more so when potential peak occupancy is considered.

None of these impact evaluations relied on information available after release of the DEIR. Further, the FEIR included a new alternative (5) which had not been assessed in the DEIR. The 'analysis' of this new alternative is minimal. In addition, as noted previously, the proposed Findings released on June 2nd refer to a new Economic Viability Report, dated May 2016, to dismiss the two action alternatives that reduce the significant and unavoidable impacts to the environment (Alternatives 3 and 5). This is new information directly impacts the selection of project alternatives, however it does not appear that Placer County performed any review to confirm the applicant's information that Alternatives 3 and 5 were not economically feasible. Placer County should conduct its own independent review of this information before dismissing environmentally superior alternatives,[112] and provide the public such information with adequate time to review. This assessment must clearly demonstrate "whether the marginal costs of the

[111] "The lead agency is required to recirculate a Draft EIR when the agency adds "significant new information" to the EIR after the close of the public comment period but prior to certification of the Final EIR. (Pub. Resources Code, § 21092.1; CEQA Guidelines, § 15088.5.) "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." (CEQA Guidelines, § 15088.5, subd. (a).) "Significant" new information includes information showing that "(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented[;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." (*Ibid.*, subds. (a)(1), (a)(2).)" (FEIR, p. 3-2).

[112] http://www.cacities.org/UploadedFiles/LeagueInternet/ad/ad81db39-d6fa-45a4-b537-0765906147eb.pdf

alternative as compared to the cost of the proposed project are so great that a reasonably prudent property owner would not proceed with the [alternative]."[113]

PF20-22 cont.

The EIR should be corrected and recirculated so the public is afforded the opportunity to provide meaningful comments and recommendations on an adequate analysis and mitigation measures, including the economic information used to dismiss the two action alternatives that result in the least impact to the environment.

[113] http://www.jdsupra.com/legalnews/rejecting-ceqa-alternatives-for-economic-154791/

PF20

Susan Gearhart, President, Friends of the West Shore
Laurel Ames, Conservation Chair, Tahoe Area Sierra Club
Jennifer Quashnick, Conservation Consultant
June 6, 2016

PF20-1 The comment introduces the comments provided in the letter and suggests that the Final EIR does not disclose or mitigate significant impacts. See responses to comments PF20-2 through PF20-22.

The comment expresses concern regarding Lake Tahoe clarity, scenic resources and night sky, traffic, wildfire hazard, and cumulative impacts. These issues are evaluated in the Draft EIR. The EIR was prepared in compliance with CEQA and provides a thorough evaluation of the project's potential environmental effects for the public and decision makers.

The comment expresses opposition to the project as it is currently proposed. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF20-2 The comment expresses concern that the Martis Valley West Parcel Specific Plan Economic Viability Analysis (dated May 2016) was referenced in the Findings, but had not been made available to the public. This analysis was provided to the commenter on June 7, 2016 (see also response to comment PF95-3).

PF20-3 The comment notes that, according to the Findings, Alternatives 3 and 5 reduce the severity of impacts and that this fact—and not just whether a significant effect is avoided—should receive greater consideration. This comment is acknowledged. In accordance with the State CEQA Guidelines (Section 15091), the Findings are supported by substantial evidence in the record, including the Draft and Final EIR. CEQA allows for alternatives to be evaluated at a lesser level of detail than the proposed project, but does require that sufficient information be provided to allow for meaningful evaluation, analysis, and comparison with the proposed project (CEQA Guidelines Section 15126.6(d)). Quantification of each impact of an alternative is not required. Consistent with CEQA, Chapter 19 of the Draft EIR provides discussion of the comparative effects of the alternatives and whether they would reduce the severity of the impacts that would occur under the proposed project. See Master Response 10 (Alternatives) in the Final EIR, regarding the alternatives analysis, which explains that the Draft EIR "permits a reasoned choice" by evaluating a range of alternatives that includes alternatives that range from no development to maximum development allowed under the Martis Valley Community Plan; alternatives to reduce impacts on key resources; alternatives that reduce all impacts, and alternative land use types and alternative locations. As discussed in Master Response 10, the EIR is sufficient in meeting CEQA requirements associated with development and evaluation of alternatives.

PF20-4 The comment suggests that the Findings misrepresent the fire danger due to the project. The Findings are supported by substantial evidence in the record, including the Draft and Final EIR. Wildfire hazards are addressed in Chapter 18 of the Draft EIR as well as in Master Response 9 in the Final EIR. The project-related introduction of people and structures to an area with high to very high wildfire risk is determined to be potentially significant (see Draft EIR Impact 18-4), and specific mitigation is included to reduce the severity of this impact. Please see Master Response 9 related to wildland fire, emergency evacuation, and the draft Emergency Preparedness and Evacuation Plan prepared as part of the MVWPSP. The Specific Plan has been revised to replace the previous Appendix D (Evacuation Plan) with the draft Emergency Preparedness and Evacuation Plan. Preparation of this this plan does not alter the conclusions of the Draft EIR.

PF20-5 The comment recommends denial of the project and consideration of Alternative 5 with the inclusion of a conservation easement. See the Final EIR, which evaluates the reduced density development alternative on the East Parcel and incorporates the information into Chapter 19, "Alternatives," of the Draft EIR. Please see response to comment I031-45 and Chapter 2, "Revisions to the Draft EIR," of the Final EIR for analysis of this alternative and revised text. Comments regarding preferences for project alternatives will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF20-6 The comment raises concerns regarding the EIR, the baseline conditions, and evaluation of the carrying capacity of the Martis Valley. Please see Master Response 3, "Baseline, in the Final EIR, which addresses concerns regarding the baseline conditions for the MVWPSP Draft EIR, including population growth in comparison to existing populations in Placer County, Truckee, and the North Lake Tahoe area. Further, the environmental effects of the increased population caused by the proposed project are fully addressed throughout the EIR.

PF20-7 The comment seems to suggest that the transportation study should have assumed that all of the project residential units would occupied by full-time residents; this premise is not supported by data for similar subdivisions in the North Tahoe area. The traffic study assumes that 20 percent of the project units would be occupied by full-time, permanent residents, and this percentage is higher than the actual full-time percentages in similar projects such Old Greenwood and Martis Camp. Even an established subdivision like Tahoe Donner, which is closer to services than is the proposed project, had about 29 percent of its home utilized full-time when it was surveyed in 2003.

This part-time, full-time split does not mean that the units are not occupied much of the year, rather, the trip generation rates are *different* on a daily and seasonal basis. As explained in Master Response 5 in the Final EIR, the traffic study assumes that 20 percent of the single-family homes and townhomes are represented by the full-time occupancy trip rates, and that 80 percent of those residential units are represented by the second home trip rates. The ITE manual provides different trip generation rates depending on whether the dwelling unit is a full-time occupancy home, or a second home because permanent residents make trips that part-time residents do not, such as taking children to school. See Master Response 5 in the Final EIR regarding the comparison of the project's trip generation rate estimate from the MVWSP study to actual rates obtained from Tahoe Donner in 2003 as part of the Truckee General Plan Update. The trip rates used in the MVWSP study yielded 50 percent more daily and peak traffic than the Tahoe Donner trip rates.

PF20-8 The comment states that additional segments of SR 28 and SR 89 should have been analyzed. See response to comment I018-13 in the Final EIR. The traffic analysis for the EIR focused on the roadways that were likely to be the most affected by project traffic (i.e., SR 267, I-80 and SR 28 closest to SR 267). Although a small portion of project traffic is expected to use SR 28 near Tahoe City and SR 89, the incremental increase in traffic due to the project would not be substantial. Although the comment suggests disagreement with the study approach, response to comment I018-13 addresses the methodology and evidence for in support of the determination of the study area.

The Draft EIR identifies thresholds that are used to determine whether an impact is significant. If the proposed project would *exceed* the threshold (e.g., increase the v/c ration by more than 0.05), then the impact is considered significant. *Approaching* a threshold is not a significant impact. For a discussion of part-time versus full-time occupancy, please see Response to Comment PF 20-7.

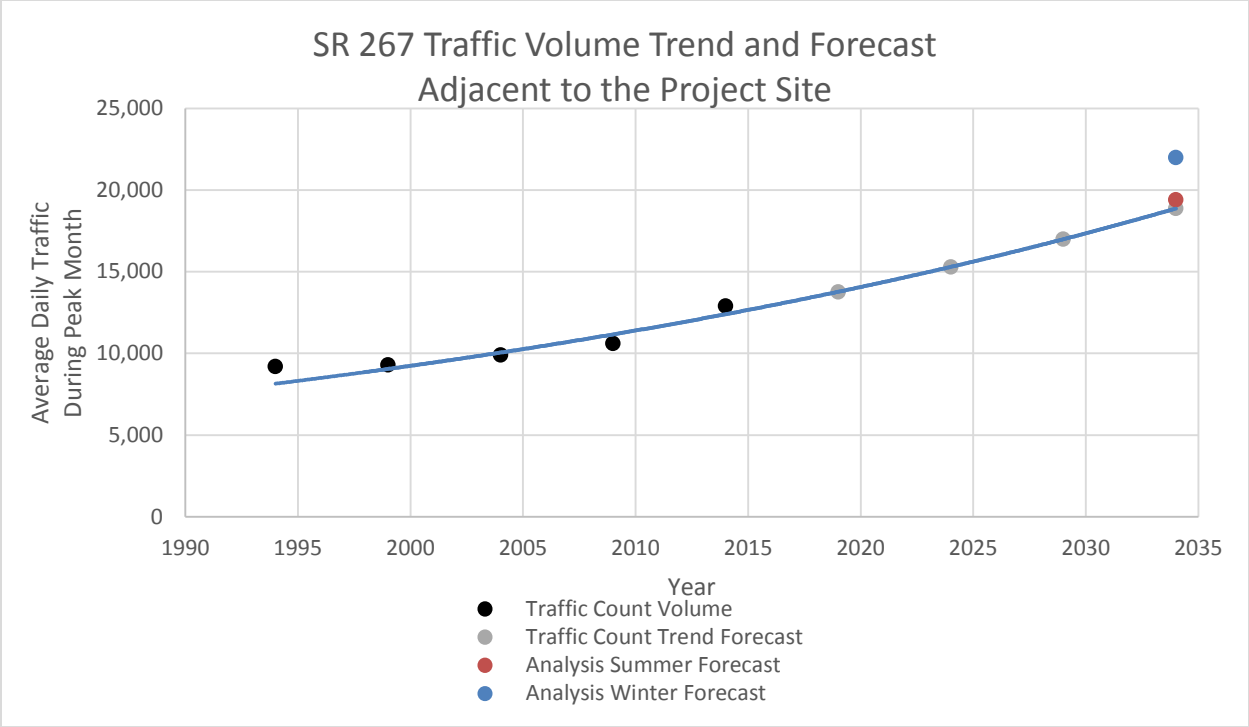
PF20-9 The comment emphasizes the importance of VMT as a metric by which to assess project impacts. The comment is acknowledged. Although VMT may eventually be the sole metric by which to assess project impacts, Level of Service is still the primary metric uses in transportation studies in Placer County. VMT information regarding the project was provided in the Final EIR.

PF20-10 The comment states that VMT should be evaluated on a cumulative basis and should include other projects such as the Village at Squaw Valley. Please refer to responses to comments PF29-21 through PF29-24, PF29-29, and PF38-9.

The comment also states that the potential VMT impacts need to be based on 100 percent full occupancy of the residential units. See Master Response 5 in the Final EIR. The Draft EIR transportation study assumed the project would have 20 percent full-time residences, which is substantially higher than the percentage of other similar projects in the area. Data obtained on the Tahoe Donner subdivision (see response to PF29-21) indicate that the Draft EIR traffic study's estimate of daily and peak hour traffic generation is approximately 50 percent higher than the rates of Tahoe Donner.

PF20-11 The comment states that the Draft EIR traffic analysis should have used the peak period traffic flow and not the 30th highest hour. The term *peak period traffic flow* does not mean the absolute highest hour of traffic flow of the entire year. The use of the 30th highest hour of traffic over the entire year represents a high level of traffic, usually much higher than is experienced on a typical Friday or Sunday, and more representative of nearly the worst Friday or Sunday throughout the entire year.

PF20-12 The comment states that the historical traffic count summary provided in the EIR only goes back to 2009, which is during the great recession. For information purposes, the following is a graph that demonstrates the amount of traffic increase projected to occur on SR 267 adjacent to the proposed project under Cumulative No Project Conditions. As shown, the average daily traffic on SR 267 during the peak month was about 12,500 in 2014 (Caltrans Traffic Counts). The Cumulative (Year 2034) No Project Traffic volumes derived from the Town of Truckee traffic model indicate an increase in summer peak day traffic volume to almost 20,000 vehicles per day and in winter peak day to over 22,000 vehicles per day. This represents an increase in traffic volumes in the range of 60 to 75 percent, which is higher than the trend in traffic growth on SR 267. This indicates that the traffic forecasts are conservative as compared to traffic growth trends.



The comment also states that the Draft EIR cumulative traffic analysis should have assumed the Brockway Campground project. See Master Response 2 in the Final EIR regarding Brockway Campground

PF20-13 The comment questions how transit will mitigate the traffic impacts. See Master Response 6 in the Final EIR and response to comment PF29-30.

PF20-14 The comment suggests that the Brockway Campground proposal is part of the MVWPSP, and cites concerns regarding utilities, growth inducement, and cumulative scenic impacts. The Brockway Campground Project is a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal. In addition, see Draft EIR Chapter 20 for evaluation of the project's potential growth-inducing impacts.

PF20-15 The comment expresses concern regarding wildfire hazards and emergency evacuation on SR 267. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR Chapter 10, "Transportation and Circulation," as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation. Wildfire hazards are addressed in Chapter 18 of the Draft EIR as well as in Master Response 9 in the Final EIR.

The Draft EIR includes a qualitative analysis of effects of the MVWPSP on emergency evacuation, and concludes that the MVWPSP would have a less-than-significant impact on emergency response and evacuation plans (Impact 18-3). Also see response to comment PF13-8.

Regarding the contribution of traffic on SR 267 from other communities, the analysis is based on a peak summer day under both existing and cumulative conditions. Therefore, traffic from other projects is included in the baseline. The analysis is conservative, because it assumes 100 percent occupancy, which would occur seldom, if at all. Note that in an evacuation, traffic from these other areas would have access to routes other than SR 267. For example, Northstar has an emergency access route through Martis Camp, so evacuees from Northstar would not necessarily use SR 267.

PF20-16 The comment raises concerns regarding the project's individual and cumulative water supply impacts. Please see Chapter 16 of the Draft EIR and Master Response 8 in the Final EIR, which address concerns regarding water supply, ongoing drought, and climate change. The comment also refers to wildfire hazards; please see response to comment PF20-15, above.

PF20-17 The comment disagrees that TRPA regulations do not apply to the project, and raises concerns regarding scenic impacts within the Lake Tahoe Basin. Please see response to comment IO18-7 in the Final EIR. As explained in the Final EIR, the proposed project is outside of the Basin, so not subject to TRPA regulations. Nonetheless, Placer County has coordinated with, among other agencies, TRPA and TMPO.

As required by CEQA, the Draft EIR analyzes scenic effects of the project, and the project contribution to cumulative changes in views and visual quality in Impacts 9-6 through 9-9. The impacts identify cumulative projects in the same viewsheds as the proposed MVWPSP and describe how those projects would alter views. The EIR discusses how the MVWPSP would contribute to the alteration of views in the cumulative context. This analytical narrative provides adequate evaluation of the project contribution to cumulative effects. Photosimulations are used in the analysis to illustrate visual changes from existing conditions. See Master Response 4 in the Final EIR, which addresses the visual resource assessment methodology and viewpoints in the Tahoe Basin.

PF20-18 The comment raises concern about tree removal on and off the project site and the potential for screening views of the proposed development. Please see Master Response 4 in the Final EIR, which explains the following:

> Models of structures that could result from the MVWPSP were prepared based on the conceptual site plan. Buildings were modeled at the maximum allowable height and each building was placed on the highest point within the building footprint, rather than at the average elevation within the building footprint, which is how Placer County measures maximum height. Buildings were displayed in a dark earth-toned color, consistent with the color requirements for buildings in the MVWPSP development standards. Other development standards and design guidelines that would require buildings to be sited to minimize visibility, maintain rocks outcroppings and other natural features, and provide vegetative screening were not reflected in the simulation. Because these additional development standards and design guidelines would reduce the visibility of structures, the simulation presents a conservative representation of the project's visual impacts.

The comment asserts that the Draft EIR does not adequately analyze cumulative impacts on nighttime views. See responses to comments I041-19 through I041-28 in the Final EIR.

PF20-19 The comment expresses concern regarding night lighting and night views from the Lake Tahoe Basin. Chapter 9 of the Draft EIR addresses these issues. See also Master Response 4 of the Final EIR. As discussed therein, the Draft EIR used a systematic multi-step process to evaluate the visibility of the project site from surrounding areas within and outside of the Tahoe Basin. The methodology assessed the site's visibility through 1) a topographic modeling analysis, 2) site visits to viewpoints, and 3) the preparation of visual profiles. This effort identified a series of key observation points, or viewpoints that had the greatest potential to be adversely affected by the project.

Visual simulations were prepared to assist the evaluation of visual impacts from each of these key observation points. The simulations were based on the project and project development boundaries as proposed in the current Specific Plan and conservatively represented the tree removal, building height, and light sources that could result from the project. Thus, the visual assessment methodology used for the Draft EIR is rigorous, state-of-the-art, and provided an appropriate basis for the visual assessment.

With regard to cumulative impacts to nighttime views, please see responses to comments I041-26 and I041-27.

The Draft and Final EIRs provide evidence that the effect on views from the Tahoe Rim Trail would not be significant, either from the portions of the trail closest to the site (see above), or those points on the trail from which the project site is visible in the distance (see response to comment I018-52, including Exhibits F3-9 through F3-12 of the Final EIR).

The comment raises concerns regarding headlights. Please see response to comment I018-69 in the Final EIR.

PF20-20 The comment expresses disagreement with the EIR's conclusions in a variety of areas, suggesting in some instances that impacts would be significant, requiring mitigation. The comment suggests that the EIR does not provide mitigation for impacts that are determined to have no impact or a less-than-significant impact. However, the footnote related to this comment quotes text in the Final EIR discussing mitigation related to impacts identified as significant for which mitigation is included in the Draft EIR. As explained in the State CEQA Guidelines (section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant. As presented throughout the Draft and Final EIR analyses,

substantial evidence has been provided to support impact conclusions, all feasible mitigation has been presented to mitigated significant impacts, and where an impact cannot be mitigated to a less-than-significant level, it has been disclosed and identified as significant and unavoidable.

PF20-21 The comment opposes the project as wasteful, citing additional energy use and traffic that would cause additional GHG emissions. These issues were evaluated in the Draft and Final EIR; see Chapter 12 of the Draft EIR and Master Response 7 of the Final EIR. Comments regarding opposition to or preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF20-22 The comment asserts that the EIR should be recirculated. See Master Response 1 in the Final EIR. In addition, no information has been received since publication of the Final EIR that would require recirculation.

RMM

REMY | MOOSE | MANLEY
LLP

PF21

Whitman F. Manley
wmanley@rmmenvirolaw.com

June 6, 2016

VIA E-MAIL

Chair Richard Roccucci and
Members of the Placer County Planning Commission
c/o Kathi Heckert, Senior Board/Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603

Re: Martis Valley West Specific Plan – Workforce Housing

Dear Commissioners:

This letter is submitted on behalf of MVWP Development LLC, the project applicant.

We wish to thank County staff and consultants for the hard work, good faith, and professionalism they have exhibited throughout this process. Sometimes we have agreed with staff's recommendations. Sometimes we have not. We have always understood and respected staff's position, even when we disagree. That is all an applicant can hope for.

PF21-1

We are writing concerning one area of potential disagreement. This potential disagreement concerns the manner in which the project will comply with County General Plan Housing Element Policy C-2, which states:

> The County shall require new development in the Sierra Nevada and Lake Tahoe areas to mitigate potential impacts to employee housing by housing 50 percent of the full-time equivalent employees (FTEE) generated by the development. If the project is an expansion of an existing use, the requirement shall only apply to that portion of the project that is expanded (e.g., the physical footprint of the project or an intensification of the use).
>
> Employee housing shall be provided for in one of the following ways:
>
> - Construction of on-site employee housing;
> - Construction of off-site employee housing;
> - Dedication of land for needed units; and/or
> - Payment of an in-lieu fee.

555 Capitol Mall, Suite 800 Sacramento CA 95814 | Phone: (916) 443-2745 | Fax: (916) 443-9017 | www.rmmenvirolaw.com

County staff and the applicant have had extensive discussions regarding how to apply this policy to the project. There has never been any dispute whether the policy applies, and we have always recognized that the project must include a workforce housing component that complies with this policy. The issue has instead been how to apply this policy.

The staff report (pages 41-44) provides a fair and accurate summary of the discussions that have occurred between staff and the applicant concerning this issue. These discussions have culminated in "Exhibit D" to the draft Development Agreement, which sets forth the project's workforce housing obligations. Exhibit D provides two options: PF21-1 cont.

- "Option 1" requires constructing 21 workforce housing units on the site.
- "Option 2" requires payment of an in-lieu fee of $2.45 million. This amount has been negotiated based on the mix of proposed uses included in the Specific Plan, and the extent to which those uses have the potential to generate full-time-equivalent ("FTE") employees.

The applicant will comply with this requirement via Option 2 – payment of an in lieu fee. The applicant will not pursue Option 1. We want to be very clear about this, so that in the future the County does not take the position that we must pursue an option that is not, in fact, feasible.

We recognize that there is interest in ensuring the construction of workforce housing. We support those efforts. The fact remains, however, that this project is not the appropriate location for workforce housing. The site is not close to existing, urban services. Residents would be unable to access such services on foot or bicycle. The site is not adjacent to an existing, higher density neighborhood, and therefore would lack the "feel" of a community.

Indeed, the staff report notes that the County rejected the proposal to dedicate land – another option for satisfying Housing Element policy – because the site would be unlikely to score well for purposes of obtaining subsidized financing for construction. (Staff Report, p. 43.) PF20-2 The site fares no better if the applicant constructs the units. The same problems remain regardless of whether the site is developed by the County or the applicant.

The County's recent experience bears out these facts. As the County is aware, the "Sawmill Heights" employee housing project has encountered financial and operational difficulties since its construction. If anything, Sawmill Heights is a better location than the project site for workforce housing. Yet, Sawmill Heights has struggled. Building a smaller complex at a more remote location, as would occur under Option 1, would fare worse.

The in-lieu fee required under Option 2 is a far greater amount than is supported by comparative analysis. The fee is based on an assessment of $117,000 per each required work-force unit (21 units x $117,000 = $2.45 million). In comparison, in March 2016, the Town of Truckee updated its in-lieu fee program, increasing its fee to $79,680 per unit. (Town of

Truckee, Town Council Resolution No. 2016-10.) The applicant is therefore paying a substantial premium over the in-lieu fees paid elsewhere in the region. PF20-2 cont.

In addition, the fee is based on an estimate of the number of FTE employees assuming the project is fully built out with a mix of unit types and uses that generates the maximum possible number of employees. Given the nature of the project, we believe it is unlikely that the maximum number of employees will in fact be generated. Nonetheless, for purposes of calculating the in-lieu fee, we accept these calculations. PF20-3

Above and beyond payment of this fee, the applicant has agreed to contribute an additional $125,000 towards regional employee housing initiatives. This money will help the County work with the Town of Truckee and other agencies in the region to enhance the supply of affordable housing for employees.

We appreciate the opportunity to share our perspective.

Very truly yours,

Whitman F. Manley

Whitman F. Manley

Attachment: Town of Truckee, Town Council Resolution No. 2016-10 (March 8, 2016)

Affordable Housing In-Lieu Fee Update
Attachment #1
Draft Resolution

TOWN OF TRUCKEE
California

RESOLUTION NO. 2016-10

A RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF TRUCKEE APPROVING AN UPDATED AFFORDABLE HOUSING IN-LIEU FEE BASED ON THE APPROVED GUIDELINES AND PROCEDURES FOR THE ADMINISTRATION OF THE AFFORDABLE HOUSING IN-LIEU FEE PROGRAM

WHEREAS, the Town Council on May 3, 2007 adopted Ordinance No. 2007-05 establishing inclusionary requirements for affordable housing on residential projects and on February 5, 2009 adopted Ordinance No. 2008-09 establishing requirements for affordable housing on non-residential projects , and

WHEREAS, Ordinances No. 2007-05 and No. 2008-09 include provisions for payment of fees in-lieu of constructing their required affordable housing; and

WHEREAS, Sections 18.214.040.E.4 and 18.216.040.F 4 of the Development Code state that the amounts, calculation, and timing of payment of the affordable housing in-lieu fee shall be established by resolution of the Town Council; and

WHEREAS, the Town Council on April 2, 2009 adopted Resolution No. 2009-13 to set the amount of the in-lieu fee and to establish guidelines and procedures for the administration of the affordable housing in-lieu fee program; and

WHEREAS, Resolution No. 2009-13, Exhibit A states that the Town Council may modify the fee by resolution based on an annual review to determine if the fee should be updated based on changes to land costs, construction costs, Town affordable housing goals, and other relevant factors; and

WHEREAS, based on a review of the housing in-lieu fee program completed by Bay Area Economics on March 2, 2011, it was determined by Town staff that the existing in-lieu fees should be modified by resolution to reflect current market conditions; and

WHEREAS, the Town Council on September 1, 2011 adopted Resolution No. 2011-42 to update the affordable housing in-lieu fee and administrative guidelines and procedures and to establish an annual process for updating the in-lieu fee described in Exhibit C of the Resolution; and

WHEREAS, the Town Council on September 11, 2012 adopted Resolution No. 2012-37 to update the affordable housing in-lieu fee and administrative guidelines and procedures and updated the annual process for updating the in-lieu fee described in Exhibit C of the Resolution; and

WHEREAS, the Town Council on October 22, 2013 found the existing housing in-lieu fee program completed by Bay Area Economics is no longer reflective of the Truckee market and directed staff to research updated methods and indices for the future updates of the affordable housing in-lieu fee; and

WHEREAS, the Town Council on October 22, 2013 adopted Resolution No. 2013-37 continuing the housing in-lieu fee adopted in Resolution 2012-37 for an additional year; and

WHEREAS, the Housing Advisory Work Group on February 12, 2015 and March 5, 2015 reviewed the draft affordable housing in-lieu fee program establishing an updated amount of the in-lieu fee and modifications to the administrative guidelines and procedures of the fee program and forwarded this draft program to the Town Council as the recommendation of the Work Group; and

WHEREAS, the Town Council on March 26, 2015 adopted Resolution No 2015-13 updating the affordable housing in-lieu fee calculation process in the administrative guidelines and procedures based on local real estate data, county income limits, and a national construction cost index as; and

WHEREAS, the Town Council directed staff to apply adopted affordable housing in-lieu fee calculation to determine the 2015 affordable housing in-lieu fee; and

WHEREAS, the Town Council finds the actions to establish an updated affordable housing in-lieu fee be exempt from further review under the California Environmental Quality Act pursuant to Section 15061(b)(3) of the CEQA Guidelines; and

****

NOW THEREFORE BE IT RESOLVED, the Town Council of the Town of Truckee hereby adopts an Affordable Housing In-Lieu Fee as set forth in Exhibit A, attached hereto and incorporated herein.

BE IT FURTHER RESOLVED, the Council hereby adopts the "Guidelines and Procedures for the Administration of the Affordable Housing In-Lieu Fee Program" as set forth in Exhibit B, attached hereto and incorporated herein.

The foregoing Resolution was introduced by Council Member _____, seconded by Council Member _____, at a Regular Meeting of the Truckee Town Council, held on the ____ day of _____, 2016 and adopted by the following vote:

AYES:

NOES:

ABSENT:

_____
Joan deRyk Jones, Mayor

ATTEST:

_____
Judy Price, MMC, Town Clerk

TOWN COUNCIL RESOLUTION NO. 2016-10
EXHIBIT A

Affordable Housing In-Lieu Fee

(A) The affordable housing in-lieu fee shall be $79,680 per affordable housing unit required.

(B) Notwithstanding the fee established in Paragraph A, the in-lieu fee for residential projects of six or less new units or lots shall be as set forth in Exhibit A1

(C) The fee is based on a methodology utilized in the Affordable Housing In-Lieu Calculations study prepared by Bay Area Economics which established the affordable housing in-lieu fee for 2012 and the baseline for future updates. This methodology calculated the funds that were be necessary to cover 100% of the gap or difference between the costs of developing a 16-unit low-income, rental project and a 16-unit moderate income, high density for-purchase project AND the revenue and return from the restricted rents and sales prices for those units, on a per unit basis. This methodology is based on current Town goals that 50% of the Town's affordable housing resources should be allocated to the construction of high density rental units affordable to low-income households and 50% should be allocated to the construction of high density for-purchase units affordable to moderate-income households. The process has been updated based on changes in the Truckee market since 2012 as indicated by the Engineering News Record's Construction Cost Index, the Truckee average median home prices provided by the Tahoe Sierra Board of Realtors, and the Nevada County income limits. This methodology and the in-lieu fee may be modified as appropriate upon modifications to the Town's affordable housing goals.

(D) The Town Council may modify the fee by resolution on or about March 1st of each year For the next year (i.e., 2016), the index-based in-lieu fee update process described in Exhibit "C" of Resolution 2015-12 shall be used for the annual updates. In 2017, a comprehensive update including a new economic and market study should be completed to fully consider changes to land costs, construction costs, affordability rates, Town affordable housing goals, and other relevant factors unless Town Council determines that this method is reasonable and accurate. If, at any time, the Council determines that there have been substantial changes to market conditions that would warrant a full economic study, the Council may direct staff to initiate a comprehensive study before the 2017 update. If, for some reason, the comprehensive review cannot be completed in time for the adoption of the 2017 affordable housing in-lieu fee, the Town Council may approve an extension of the application of the index-based in-lieu fee update process outlined in Exhibit C" of Resolution 2015-12.

(E) The administration fee for Town services provided in the assessment and collection of mitigation fees shall be $60.00 for each payment. The Town Council may modify the administration fee by resolution.

TOWN COUNCIL RESOLUTION NO. 2016-10
EXHIBIT A1

Affordable Housing In-Lieu Fee
Residential Projects of Six or Less Units or Lots

The affordable housing in-lieu fee for residential projects of six or less new units or vacant lots shall be based on a sliding scale as follows:

Total # of New Units/Lots	Sliding Scale In-Lieu Fee Payment
1	Exempt per below***
2	*$13,745****
3	*$23,665*
4	*$35,617*
5	*$49,601*
6	*$65,616*

*****Exemptions from Payment of Inclusionary Housing In-lieu Fees:**

1 Exemptions by Ordinance: Refer to Development Code Section 18.214.040.F for a complete list of exemptions from payment of inclusionary housing in-lieu fees, including, but not limited to:
- The construction of one single-family dwelling unit on an existing single-family lot.
- The construction of a secondary residential unit in accordance with Section 18.58.230.
- The construction of a single-family dwelling unit or duplex unit on an existing multi-family lot in which the total number of dwelling units on the lot does not exceed two. If additional dwelling units are subsequently constructed on the lot, the single-family dwelling unit and/or duplex unit shall be included and calculated towards the inclusionary requirements.

2. Additional Exemptions for Residential Subdivisions:
- Underlying Parcel Exemption: The original, underlying/parent parcel proposed to be subdivided shall **not** be counted as a newly-created parcel for the purposes of calculating in-lieu fees.
  - Example: A residential parcel is proposed to be subdivided into four parcels. This would result in three newly-created parcels, and the applicant would pay a *$23,011* in-lieu fee.
- One New Lot Exemption: The subdivision of one residential lot into a total of two residential lots (one new lot) shall be exempt from payment of inclusionary housing in-lieu fees. If either of the resultant parcels is subsequently subdivided further, the previously-created lot shall be included and calculated towards the inclusionary requirements for the new subdivision.
  - Example: In 2013 a residential parcel is subdivided into two parcels (Resultant Parcels A & B), therefore the applicant is exempt from payment of in-lieu fees for the one newly-created lot. In 2014 Resultant Parcel A is further subdivided into two parcels (Resultant Parcels A & C), therefore the applicant would pay an in-lieu fee of *$13,745* for two newly-created parcels (2013's Resultant Parcel B and 2013's Resultant Parcel C).

TOWN COUNCIL RESOLUTION NO. 2016-10
EXHIBIT B

Guidelines and Procedures for the Administration of the Affordable Housing In-Lieu Fee Program

Section 1. Purpose. The following guidelines and procedures have been developed to facilitate the implementation of the Town of Truckee Affordable Housing In-Lieu Fee Program for small projects and for large projects when payment of in-lieu fees is permitted under the Administrative Guidelines and Procedures for Affordable Housing. These guidelines and procedures are intended to provide direction to Town staff and the public regarding the detailed procedures for implementing the fee program. The Community Development Director shall be the principal Town staff person designated with the responsibility of implementing these guidelines and procedures.

Section 2. Eligibility. These guidelines and procedures shall be applicable to the payment of in-lieu fees on small projects for which the payment of the in-lieu fee is at the discretion of the developer; small projects are defined as residential projects with six or less new units or lots and non-residential projects that generate less than 20 full-time equivalent employees. For larger projects where the payment of the in-lieu fee is at the discretion of the review authority of the land use permit, these guidelines and procedures shall be applicable to the payment of a fractional in-lieu fee. If the review authority approves the payment of the in-lieu fee for a large project, these guidelines and procedures shall be applicable except as modified by the action of the review authority

Section 3. Fee. The amount of the fee shall be established by this Council resolution unless a subsequent resolution is adopted to supersede this resolution.

Section 4. Assessment of Fees. The Community Development Director shall assess the affordable housing in-lieu fee as follows:

A. The amount of the in-lieu fee shall be calculated based on the number or fraction of affordable housing units required for the project, as determined by the review authority for the land use permit, multiplied by the in-lieu fee per required affordable housing unit.

B. The amount of the in-lieu fee shall be calculated based upon the fee schedule in effect at the time of building permit application or at the time that Town staff determines the tentative map application to be complete for processing for residential subdivisions with vacant lots. For residential subdivisions with vacant lots, if the in-lieu fee in effect at the time of parcel or final map application is lower than the fee set forth in the conditions of approval of the tentative map, the applicant shall pay the lower amount.

C For projects approved prior to the April 2, 2009 adoption of Council Resolution 2009-13 which established guidelines and procedures and which included a condition addressing the payment of an in-lieu fee, the fee shall be assessed as set forth in the condition of approval of the land use permit.

D Except for payment of a fractional in-lieu fee, the Community Development Director may proportion the amount of the in-lieu fee charged to each building permit for projects with two or more building permits. For projects with a fractional in-lieu fee, the fee shall be paid at the time of the first building permit.

Section 5. Payment, Collection, and Refund of Fees.

A. The Community Development Director shall collect the in-lieu fee in the same manner as Town impact or mitigation fees and building permit fees in accordance with Town policies and procedures except as modified or clarified in these guidelines and procedures.

B. The applicant shall pay the in-lieu fee prior to or at the time of issuance of a building permit or recordation of the parcel or final map, whichever occurs first, unless the review authority approves an alternate fee payment schedule in accordance with the Affordable Housing Administrative Guidelines and Procedures. The applicant may pay the fee by cash, personal or business check, cashier's check, money order, certified check, or credit card payment.

C. The Community Development Director may approve a deferral of the fee payment until occupancy of the structure or parcel if the required fee is less than $35,000 and the applicant enters into a recorded agreement with the Town to pay the fee. An application fee may be required for the consideration and processing of the deferral.

D If the in-lieu fee is paid and the building permit expires or is canceled or voided, or the land use permit which triggers the application of the fee fails to vest within the terms of the land use permit, the Community Development Director may, upon written request of the developer, order return of the fee (or portion thereof) if work on the project has not progressed to a point that would permit commencement of a new, changed, or expanded use for which a fee would be payable.

Section 6. Appeals. The project proponent may appeal the fee assessment to the Town Council prior to issuance of the building permit. Appeals will be considered in a public hearing with notice provided to the project proponent and any other parties requesting notice. A building permit will not be issued until all fee disputes are resolved.

Section 7. Use of Fees.

A. The Town Council shall use and distribute all fees collected to support Town of Truckee affordable housing programs in the Truckee region.

B. All fees collected under the Affordable Housing In-Lieu Fee Program shall be deposited into an account separate from other Town funds or accounts. Any interest earned by such account shall be deposited into that account.

Town of Truckee
2015-2016 Affordable Housing In-Lieu Fee Calculation, Sheet 1 of 2

MLS Median Sales Price
Truckee Single Family Residential

	January	February	March	April	May	June	July	August	September	October	November	December	Average	Change
2015	$ 500,010	$ 885,000	$ 893,950	$ 915,000	$ 424,000	$ 490,000	$ 857,600	$ 884,900	$ 525,800	$ 820,000	$ 522,000	$ 469,000	$ 522,167	3%
2014	$ 386,000	$ 465,000	$ 563,169	$ 447,460	$ 559,268	$ 453,250	$ 540,000	$ 491,250	$ 486,000	$ 524,050	$ 610,000	$ 636,501	$ 508,749	18%
2013	$ 364,250	$ 492,000	$ 419,600	$ 415,020	$ 391,000	$ 406,000	$ 435,000	$ 427,500	$ 437,000	$ 415,000	$ 450,000	$ 500,000	$ 429,279	25%
2012	$ 308,000	$ 306,250	$ 307,500	$ 284,450	$ 317,475	$ 337,500	$ 440,000	$ 387,500	$ 350,000	$ 325,649	$ 387,250	$ 405,000	$ 340,455	-3%
2011	$ 344,250	$ 309,000	$ 431,000	$ 332,500	$ 306,900	$ 571,139	$ 335,000	$ 330,000	$ 322,000	$ 298,000	$ 442,962	$ 317,500	$ 352,446	-12%
2010	$ 417,500	$ 516,000	$ 349,800	$ 404,000	$ 420,000	$ 350,000	$ 375,000	$ 376,000	$ 480,000	$ 314,750	$ 403,500	$ 415,000	$ 390,313	-8%
2009	$ 384,500	$ 600,000	$ 480,000	$ 355,000	$ 399,900	$ 440,000	$ 449,000	$ 379,900	$ 400,000	$ 462,050	$ 493,000	$ 495,000	$ 440,242	-10%
2008	$ 475,000	$ 487,000	$ 584,000	$ 537,500	$ 410,000	$ 466,250	$ 595,000	$ 457,500	$ 413,000	$ 472,500	$ 445,000	$ 434,500	$ 487,271	-14%
2007	$ 704,000	$ 550,000	$ 432,500	$ 590,000	$ 631,000	$ 490,000	$ 570,000	$ 603,000	$ 447,500	$ 485,000	$ 612,000	$ 673,500	$ 566,187	2%
2006	$ 515,000	$ 625,000	$ 495,000	$ 629,000	$ 642,500	$ 680,000	$ 549,000	$ 542,500	$ 502,000	$ 598,950	$ 492,000	$ 485,000	$ 555,653	-1%
2005	$ 615,000	$ 515,000	$ 639,000	$ 490,500	$ 554,500	$ 537,000	$ 572,000	$ 589,350	$ 572,500	$ 532,000	$ 575,000	$ 530,000	$ 561,079	30%
2004	$ 409,500	$ 392,000	$ 377,750	$ 422,500	$ 458,360	$ 434,300	$ 425,000	$ 480,000	$ 451,329	$ 445,000	$ 407,000	$ 431,000	$ 431,289	–

Tahoe Donner Single-Family Residential

	January	February	March	April	May	June	July	August	September	October	November	December	Average	Change
2015	$ 725,869	$ 622,000	$ 635,000	$ 542,500	$ 647,500	$ 652,250	$ 588,150	$ 635,000	$ 682,000	$ 606,500	$ 625,000	$ 598,000	$ 624,667	-1%
2014	$ 477,500	$ 691,250	$ 567,500	$ 737,500	$ 590,000	$ 546,000	$ 527,000	$ 557,500	$ 615,000	$ 569,000	$ 770,000	$ 610,000	$ 612,771	11%
2013	$ 387,000	$ 471,500	$ 534,000	$ 565,000	$ 565,750	$ 529,000	$ 578,700	$ 509,000	$ 535,000	$ 545,000	$ 573,750	$ 741,250	$ 552,458	15%
2012	$ 405,000	$ 375,500	$ 530,000	$ 476,000	$ 513,000	$ 500,000	$ 475,000	$ 503,500	$ 510,950	$ 490,000	$ 510,000	$ 449,500	$ 479,534	-8%
2011	$ 512,500	$ 455,000	$ 516,500	$ 502,500	$ 499,000	$ 444,044	$ 509,000	$ 579,500	$ 478,500	$ 542,599	$ 580,000	$ 535,000	$ 512,129	-4%
2010	$ 430,000	$ 505,000	$ 612,000	$ 539,000	$ 425,000	$ 545,000	$ 490,000	$ 525,000	$ 519,500	$ 510,000	$ 619,900	$ 482,500	$ 532,802	-7%
2009	$ 423,000	$ 680,000	$ 630,000	$ 511,000	$ 590,000	$ 622,000	$ 500,000	$ 565,000	$ 568,500	$ 625,000	$ 535,000	$ 664,600	$ 573,625	-18%
2008	$ 652,500	$ 907,000	$ 645,000	$ 725,000	$ 779,000	$ 600,000	$ 583,000	$ 687,500	$ 707,500	$ 610,000	$ 710,000	$ 932,750	$ 702,438	1%
2007	$ 717,500	$ 672,500	$ 675,000	$ 675,000	$ 734,500	$ 687,000	$ 622,000	$ 625,250	$ 680,000	$ 643,373	$ 750,000	$ 875,000	$ 690,594	-4%
2006	$ 790,000	$ 689,000	$ 699,500	$ 735,000	$ 819,000	$ 730,000	$ 698,000	$ 709,598	$ 676,000	$ 640,000	$ 685,000	$ 787,500	$ 718,667	-7%
2005	$ 765,000	$ 692,500	$ 799,000	$ 850,000	$ 727,100	$ 754,750	$ 807,000	$ 758,500	$ 918,000	$ 705,000	$ 830,000	$ 730,000	$ 765,904	31%
2004	$ 530,000	$ 579,000	$ 546,500	$ 522,000	$ 584,000	$ 535,000	$ 540,000	$ 685,000	$ 607,500	$ 595,000	$ 617,000	$ 688,500	$ 580,208	–

Total Single Family Residential (Median for Truckee and Tahoe Donner)

	January	February	March	April	May	June	July	August	September	October	November	December	Average	Change
2015	$ 612,505	$ 553,500	$ 614,495	$ 528,750	$ 535,750	$ 521,125	$ 572,875	$ 598,750	$ 603,800	$ 583,250	$ 522,900	$ 532,000	$ 563,417	0.7%
2014	$ 431,750	$ 588,125	$ 560,344	$ 592,475	$ 577,133	$ 499,825	$ 533,500	$ 574,375	$ 558,000	$ 541,625	$ 690,900	$ 573,251	$ 559,758	14.0%
2013	$ 375,825	$ 481,750	$ 476,800	$ 451,500	$ 479,875	$ 488,500	$ 508,853	$ 513,250	$ 436,000	$ 480,000	$ 511,875	$ 620,625	$ 490,888	19.7%
2012	$ 355,500	$ 342,875	$ 418,750	$ 356,725	$ 415,239	$ 418,750	$ 457,500	$ 408,500	$ 434,975	$ 407,625	$ 448,825	$ 427,750	$ 410,501	-5.2%
2011	$ 428,125	$ 382,000	$ 473,750	$ 417,500	$ 402,500	$ 508,042	$ 412,500	$ 454,750	$ 400,250	$ 420,500	$ 461,461	$ 426,250	$ 432,287	-7.2%
2010	$ 423,750	$ 510,500	$ 490,300	$ 487,500	$ 522,500	$ 447,500	$ 432,500	$ 450,500	$ 464,750	$ 412,375	$ 511,740	$ 448,750	$ 466,072	-8.1%
2009	$ 393,750	$ 640,000	$ 555,000	$ 428,000	$ 494,950	$ 531,000	$ 474,500	$ 472,250	$ 454,250	$ 603,500	$ 500,000	$ 557,000	$ 506,933	-14.7%
2008	$ 595,250	$ 742,000	$ 564,900	$ 621,250	$ 569,500	$ 533,125	$ 659,660	$ 582,800	$ 568,750	$ 541,250	$ 677,500	$ 643,625	$ 594,054	-5.3%
2007	$ 710,750	$ 608,250	$ 553,750	$ 607,500	$ 684,250	$ 573,500	$ 598,000	$ 714,125	$ 558,750	$ 654,187	$ 681,250	$ 675,250	$ 626,380	-1.2%
2006	$ 653,000	$ 647,000	$ 593,750	$ 632,000	$ 730,750	$ 705,000	$ 610,500	$ 634,750	$ 586,000	$ 619,975	$ 588,000	$ 630,250	$ 636,185	-4.3%
2005	$ 640,000	$ 598,750	$ 718,000	$ 671,250	$ 645,500	$ 645,873	$ 689,750	$ 673,925	$ 625,250	$ 687,500	$ 702,500	$ 632,000	$ 664,867	30.7%
2004	$ 472,350	$ 490,500	$ 493,125	$ 522,250	$ 521,250	$ 484,960	$ 462,500	$ 532,500	$ 520,412	$ 512,800	$ 537,800	$ 591,750	$ 508,749	–

Engineering News Report - 20-City Average
Construction Cost Index (CCI)

	January	February	March	April	May	June	July	August	September	October	November	December	Average	Change
2015	9972	9962	9972	9992	9979	10039	10037	10039	10085	10128	10092	10315	10049.33	2.5%
2014	9664	9681	9702	9750	9796	9800	9835	9846	9870	9858	9912	9936	9806.50	2.7%
2013	9437	9453	9456	9454	9516	9542	9552	9545	9552	9559	9595	9668	9546.67	2.6%
2012	9176	9198	9268	9273	9290	9297	9324	9351	9341	9376	9398	9412	9308.17	2.6%
2011	8938	8988	9011	9027	9035	9053	9050	9088	9116	9147	9173	9172	9069.83	3.1%
2010	8660	8672	8671	8677	8761	8805	8844	8837	8836	8921	8951	8952	8798.92	2.7%
2009	8549	8533	8534	8528	8574	8578	8566	8564	8596	8596	8592	8641	8570.08	3.1%
2008	8090	8094	8109	8112	8141	8185	8293	8362	8557	8623	8602	8551	8309.92	4.3%
2007	7880	7880	7856	7865	7942	7939	7959	8007	8050	8045	8092	8089	7967.00	2.8%
2006	7660	7689	7692	7695	7691	7700	7721	7722	7763	7883	7911	7888	7751.25	4.1%
2005	7297	7298	7309	7355	7398	7415	7422	7479	7540	7563	7630	7647	7446.08	4.7%
2004	6825	6862	6957	7017	7065	7109	7126	7188	7298	7314	7312	7308	7115.08	8.3%
2003	6581	6640	6627	6635	6642	6694	6695	6733	6741	6771	6794	6782	6694.50	2.4%
2002	6462	6462	6502	6480	6512	6532	6605	6592	6589	6579	6578	6563	6538.00	3.1%
2001	6281	6272	6279	6286	6288	6318	6404	6389	6391	6397	6410	6390	6342.08	1.9%
2000	6130	6160	6202	6201	6233	6238	6225	6233	6224	6259	6266	6283	6221.17	–

CCI uses 200 hours of common labor, multiplied by the 20-city average rate for wages and fringe benefits

Nevada County Income Limits (Four-Person Area Median Income)

	Area Median Income*	Percentage Change
2015	$ 73,500	0.0%
2014	$ 73,500	1.2%
2013	$ 72,600	0.0%
2012	$ 72,600	1.4%
2011	$ 71,600	3.5%
2010	$ 69,200	0.1%
2009	$ 69,100	6.1%
2008	$ 65,100	0.0%
2007	$ 65,100	1.4%
2006	$ 64,200	0.9%
2005	$ 63,600	0.0%
2004	$ 63,600	7.8%
2003	$ 59,000	15.5%
2002	$ 51,100	3.0%
2001	$ 49,600	1.6%
2000	$ 48,800	–

Base: 2012 Adopted In-Lieu Fee
$ 65,130

Truckee Affordable Housing In-Lieu Fee Index:

	Index	In-Lieu Fee Prior to Income Adjustment	Income Change	Proposed In-Lieu Fee (with Income Adjustment)	Change
2015/2016	1.58%	$ 79,650	0.0%	$ 79,650	$ 2,200
2014	8.38%	$ 76,452	1.2%	$ 77,460	$ 5,091
2013	11.15%	$ 72,369	0.0%	$ 72,369	$ 7,239

Proposed 2015/2016 Affordable Housing In-Lieu Fee
$ 79,650

Attachment #2:
Affordable Housing In-Lieu Fee
Calculation Worksheets

Town of Truckee
2015/2016 Affordable Housing In-Lieu Fee Calculation, Sheet 2 of 2

Inclusionary Housing In-Lieu Fee Sliding Scale

Housing In-Lieu Fee, as determined on Sheet 1: ***$79,680***

Table #1:

Standard in-lieu fee requirement; all projects pay for 15% of the new dwelling units/lots created:

Total # of New Units/Lots	Standard % of In-Lieu Fee Req'd	Sliding Scale Factor = *None*	Standard In-lieu Fee	In-Lieu Fee Payment
1	15%	100%	$79,680	$11,952
2	30%	100%	$79,680	$23,904
3	45%	100%	$79,680	$35,856
4	60%	100%	$79,680	$47,808
5	75%	100%	$79,680	$59,760
6	90%	100%	$79,680	$71,712
7	105%	100%	$79,680	$83,664

Table #2:

********Applied to Draft Council Resolution, Exhibit A1 ********

8.5% sliding scale applied, with the smallest projects paying 49% of their share of the standard fee:

Total # of New Units/Lots	Standard % of In-Lieu Fee Req'd	Sliding Scale Factor = *8.5%*	Standard In-lieu Fee	In-Lieu Fee Payment
1	15%	49.0%	$79,680	$5,856
2	30%	57.5%	$79,680	$13,745
3	45%	66.0%	$79,680	$23,665
4	60%	74.5%	$79,680	$35,617
5	75%	83.0%	$79,680	$49,601
6	90%	91 5%	$79,680	$65,616
7	105%	100.0%	$79,680	$83,664

PF21

Whitman F. Manley, Remy, Moose, Manley
June 6, 2016

PF21-1 The comment, submitted on behalf of the project applicant, addresses the manner in which the MVWPSP Project would comply with the County General Plan Housing Element Policy C-2. The comment states that Exhibit D of the draft Development Agreement provides two options for complying with workforce housing obligations, and that the application plans to comply with the requirements via Option 2 – payment of an in-lieu fee. The applicant will not pursue Option 1 (construction of 21 workforce housing units on the site), but rather will pay an in-lieu fee per Option 2.

PF21-2 The comment states that the applicant supports the construction of workforce housing, but that the project site is not the appropriate location for workforce housing. The comment points to a County staff report that rejected the proposal to dedicate land (another option for satisfying the Housing Element policy) because the project site would be unlikely to score well for purposes of obtaining subsidized financing for construction. The comment also points to the struggles of the Sawmill Heights workforce housing. The in-lieu fee for the MVWPSP Project is based on an assessment of $117,000 per workforce housing unit (21 units x $117,000= $2.45 million), which is greater than elsewhere in the region; the Town of Truckee in-lieu program increased to $79,680 per unit in March 2016.

PF21-3 The comment states that the fee described in PF21-2 assumes that the MVWPSP is fully built-out and generates the maximum number of employees, which may be unlikely. However, the in-lieu fee would still be provided for 21 units. Furthermore, the applicant has agreed to contribute an additional $125,000 to regional employee housing initiatives to support the enhancement of affordable employee housing in the region.

From: Stacy Wydra
To: Kathi Heckert
Cc: Shirlee Herrington; Paul Thompson; EJ Ivaldi; Karin Schwab; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Suzanne Enslow; Sydney Coatsworth; Phil Frantz; Gerry Haas; Andy Fisher; Lisa Carnahan; Justin Hansen; Stephanie Holloway; Huey Nham
Subject: CORRESPONDENCE BINNEY, GEORGE FW: Deny permit for ridgeline development at Tahoe
Date: Monday, June 6, 2016 2:50:04 PM
Attachments: image003.png

PF22

Hello All -
Please find additional correspondence on the MVWPSP.
Thank you!
Stacy

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Gpoppi [mailto:gpoppi@aol.com]
Sent: Monday, June 06, 2016 11:38 AM
To: Stacy Wydra
Subject: Deny permit for ridgeline development at Tahoe

Dear Placer County,

Please deny and development of the ridgeline above the West Shore of Lake Tahoe.All the residents and even visitors
in and around the North Shore are opposed to this degradation of the Lake and its surrounding area.This is an important
recreation area,but more important is the increase in traffic causing even more congestion and the loss of the beauty of the
surrounding mountains.

Please do not make a decision which will further degrade this national treasure! PF22-1

Sincerely yours,
George A Binney

PF22

George A. Binney
June 6, 2016

PF22-1 The comment expresses opposition to the project, citing concerns related to ridgelines and traffic. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF23

From: Stacy Wydra
To: Kathi Heckert
Cc: Fran Ruger; Sydney Coatsworth; Suzanne Enslow; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); EJ Ivaldi; Paul Thompson; Karin Schwab
Subject: FW: Martis Valley West Project
Date: Monday, June 6, 2016 2:24:37 PM
Attachments: image003.png

More correspondence.
Thanks!
S.

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

County of Placer

From: Tim Ferrell [mailto:ferrell@ftcivil.com]
Sent: Monday, June 06, 2016 2:22 PM
To: Stacy Wydra
Subject: FW: Martis Valley West Project

Stacy,
In regard to the new development in Northstar I whole heartily feel that the traffic study needs to be modified showing the effects of every existing community (North Lake Tahoe, Martis Camp, Lahontan, Sierra Meadows.. etc...), ski traffic, camp ground traffic will have on highway 267. In addition this traffic study should also contain provisions for slippery roads and harsh weather.

PF23-1

Currently I cannot drive to Truckee in the winter months because the highway is backed up several miles every single day due to traffic from the Northstar community. If you add more homes and a large campground this will further over burden an important highway allowing safe exit from the Tahoe Basin.

If you are going to allow this large development then Highway 267 should be increased in width

from 2 lanes to 4 lanes between the Northstar connection and Interstate 80.

Sincerely,

Tim Ferrell, P.E.
P.O.Box 361
Tahoe Vista, CA 96148

PF23-1 cont.

PF23

Tim Ferrell
June 6, 2016

PF23-1 The comment expresses concerns related to traffic on SR 267 and that this road should be increased from two to four lanes if MVWPSP is approved. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR 10, "Transportation and Circulation," as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

The comment also mentions the campground project, presumably the Brockway Campground, a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal.

PF24

To the Placer County Board of Supervisors and the Planning Commission.

Re. Martis Valley West Project and campground

In 1964, I made my first trip to the Tahoe Basin and spent my winters in Tahoe until 1973. We became permanent residents [year round]in Truckee, Calif. in 1973 .In the early 1970's, traffic congestion was not considered an issue on route 267. As Northstar began developing, traffic soon often went into a gridlock situation. During the winter, most locals stay home during the week-ends. If there is an accident, you could be sitting hours in your car. Often, it takes 2 hours to get to Truckee from Northstar due to Traffic Congestion [a normal 15 minute drive]. Please consider what benefits Martis Valley West will have for the general public. PF24-1

There is a 7 % grade entering Watson Road. Also, there is at least a 9 to 11% grade in the area on route 267. There is also a blind corner that makes it extremely difficult to cross the highway to head back to Truckee or to make a right turn towards Kingsbeach. If development occurs off of Watson Road, the entire route 267 would have to be changed. Cal-Trans *should* not be responsible for doubling the width of the road and figuring how to deal with egress /ingress from Watson Rd. onto route 267. The DEVELOPER is making the profit from Martis Valley West and the **TAX PAYER** WILL BE RESPONSIBLE FOR ROAD BUILDING AND MAINTANENCE. I spoke to Cal-Trans representatives and they noted these issues have been addressed before and totally ignored. Already, route 267 is in a failure mode---note LOS **F .** In the event of a forest fire, large earthquake, or other natural disaster, there will be no evacuation route available. One accident shuts the road down for hours now! What are we thinking???? In our large winters, Emergency vehicles do not have room to pass on the shoulders with cars running out of gas and blocking the sides of the road. PF24-2

Consider all the new development with the Joerger project, the Highlands, etc. in evaluating Martis Valley West. They are all off of route 267.

Place County needs to have a RIDGELINE policy in place to protect the beauty of the Tahoe Basin. It is always a pleasure to visit parts of Colorado and many other states and not have to view homes along ridges. It is surprising that Placer County has not already in-acted a ridgeline policy. Many problems would be solved for all parties involved with an ENFORCABLE RIDGELINE POLICY. PF24-3

Reading the EIR, it appears that residential assumption is based on 20% full time residents. Have you considered all the rental homes and units that will be occupied much of the time and this will be occurring year around? The report for vehicle analysis would therefore not be addressed adequately. The impacts to the air quality will be greatly affected by all the construction and timber harvest ---all will have a cumulative affect on the environment. What type of analysis of Construction related Impacts has been completed or even studied? PF24-4

Water quantity, quality and all the construction and future resident usage affects on local streams and hydrology reports do not seem to be addressed in the EIR. With the huge campground project next to the housing project, these issues must be addressed. Water is needed for fighting wildfires; where will it come from in an emergency. PF24-5

Please consider a denial of this project.

Sincerely,
Ellen M. Hyatt
11330 Skyline Ct.
Truckee, Calif. 96161

PF24

Ellen M. Hyatt
June 6, 2016

PF24-1 The comment expresses concerns related to traffic on SR 267. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR 10, "Transportation and Circulation," as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF24-2 The comment expresses concerns regarding roadway grades and site lines on SR 267 and Watson Road. The comment also expresses concerns regarding emergency evacuation and evaluation of cumulative projects in the area that are accessed from SR 267. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR 10, "Transportation and Circulation," as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation. In terms of cumulative traffic impacts (Draft EIR Impacts 10-8 through 10-13), projects in the MVWPSP vicinity that have the possibility of interacting with the MVWPSP to generate a cumulative impact were considered and are listed in Draft EIR Table 4.2. The projects considered in the EIRs cumulative impact analyses included Joerger Ranch and Northstar Highlands.

The MVWP would not use Mount Watson Road (Fibreboard Freeway) for project access. Rather, a new connection to SR 267 would be constructed approximately 1.3 miles north of Brockway Summit and would have a grade of approximately 6.5 percent. Please see Response to Comment PF27-29 for a description of the access intersection. In addition, an all-season emergency vehicle access would be provided through the MVWP area. Fibreboard Freeway, which is closed during the winter, could be used as a secondary emergency access if needed, but would not provide full access the MVWPSP.

As discussed in Response to Comment PF13-8 (Item 3), a combination of Caltrans funds and County fee revenue would fund improvements on SR 267. The proposed project would pay the County traffic fee that would be used to fund SR 267 improvements.

PF24-3 The comment suggests that Placer County should adopt an enforceable ridgeline policy. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the project and ridgeline protections into consideration.

PF24-4 The comment questions the Draft EIR traffic study assumption that 20 percent of the project's residential dwelling units would be occupied by full-time residents and 80 percent would be part-time or second homes. These concerns were addressed in Master Response 5 in Section 3.1.5 of the Final EIR.

The comment also raises concerns about evaluation of air quality effects and construction-related effects. As stated in Chapter 4 of the Draft EIR, the potentially significant environmental effects of all phases of the MVWPSP, including construction and operation, are evaluated in Chapters 5 through 18 (consistent with State CEQA Guidelines Section 15126.2). Specifically, air quality and greenhouse gas (GHG) impacts are evaluated in Chapters 11 and 12 of the Draft EIR and the GHG analysis is further discussed in Master Response 7 of the Final EIR.

PF24-5 The comment raises concerns regarding water supply, water quality, and hydrology impacts. Please see Chapter 15, “Hydrology and Water Quality,” and Chapter 16, “Utilities,” of the Draft EIR, which evaluate these resources.

The comment also mentions the campground project, presumably the Brockway Campground, a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal.

The comment recommends denial of the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert **PF25**

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:34 PM
To: Kathi Heckert
Subject: FW: please DENY the Martis Valley West Project

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Laura Lambert [mailto:laura.lambert@gmail.com]
Sent: Monday, June 06, 2016 5:51 PM
To: Stacy Wydra
Subject: please DENY the Martis Valley West Project

Hello,

My family is part of two time-share properties on Lake Tahoe's Brockway Point. The extended family has had the property and vacationed there since 1947 -- my husband grew up on that point, as his father did before him and as our two children do now. We have a vested interest in not destroying, polluting and further overcrowding the already stressed Tahoe Basin. The Martis Valley West project threatens to do all of that. I ask that you NOT let it proceed. PF25-1

Thank you,
Laura Lambert

--
Laura Lambert
323-600-4184
laura.lambert@gmail.com

PF25 Laura Lambert June 6, 2016

PF25-1 The comment expresses opposition to the project as it is currently proposed. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Issues related to direct and induced growth and environmental impacts are evaluated in the EIR.

Kathi Heckert

PF26

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:33 PM
To: Kathi Heckert
Subject: FW: North Lake Tahoe Proposed Ridgeline Development

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

County of Placer

From: jim sajdak [mailto:jim@cs3.us]
Sent: Monday, June 06, 2016 10:27 PM
To: Stacy Wydra
Subject: FW: North Lake Tahoe Proposed Ridgeline Development

I am sending this email as a full time resident of North Lake Tahoe who is very concerned with the proposed ridgeline development in the Martis area. Also as a long and full time resident I am very concerned and would like to state that the homeowners of North Lake Tahoe and the Eastern portion of Placer County have no voice or representation. Living in one of the most beautiful and irreplaceable places in the country is a major concern with the direction being taken by Placer County. There are no Placer County Board members that live in the North Shore area of Lake Tahoe. While Jennifer Montgomery lives on Donner Summit she is not a resident of North Lake Tahoe. Even if Jennifer Montgomery listened and voted in the direction of the majority of the North Shore residents she would be out voted by the other four board members who live in Western Placer County; 60 miles away. There is a completely different life style, community and community needs between North Lake Tahoe and Western Placer County. As noted we as full time residents have no voice. PF26-1

To get a accurate sense for what the local residents of the North Shore would approve I suggest a vote. By a vote there is no pressure from the developer, who is for the project from a financial interest, or the Placer CEO who is trying to push a project through without community approval.

I am not saying that I am against or for the project, I am stating that Placer County needs to determine what the majority of the local North Lake Tahoe Community is requesting and vote accordingly. Based on conversations throughout the community I can assure you that the majority of the community does not support the proposed ridgeline development. Even if the land is approved for the requested use, the direction stated by the majority of the community should over rule the landowners/developers proposed project. PF26-1 cont.

Jim Sajdak
Tahoe City

PF26

Jim Sajdak
June 6, 2016

PF26-1 The comment expresses that a majority residents of the North Shore of Lake Tahoe oppose the project as it is currently proposed and that Placer County should take a vote on the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. The comment raises concern about ridgelines. Please see response to comment I051-46 in the Final EIR.

Kathi Heckert

PF27

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:33 PM
To: Kathi Heckert
Subject: FW: Martis Valley West Project

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

County of Placer

From: Jmtornese@aol.com [mailto:Jmtornese@aol.com]
Sent: Monday, June 06, 2016 8:12 PM
To: Stacy Wydra
Cc: ann@annnichols.com; jqtahoe@sbcglobal.net
Subject: Martis Valley West Project

Dear Placer Planning Commission,

My husband and I cannot attend the meeting of the Placer County Planning Commission this Thursday, June 9 at Granlibakken, to determine the fate of the Martis Valley West project.

We are quite concerned about this project and want to emphasize our strong opposition to the current proposal. The fate of Tahoe and it's iconic ridgelines are at stake and Placer's decision could degrade the beauty of the Tahoe area FOREVER! PF27-1

The County has ignored the project's significant and unavoidable environmental traffic, GHG and scenic impacts and are forging ahead recommending approval. Also, saving 6,000 acres in Truckee isn't worth losing our ability to evacuate safely in case of a fire and the general traffic gridlock in Tahoe and Truckee. The adjacent Brockway Campground (550 sites) isn't even considered in the analysis. You cannot dismiss the negative environmental impacts. Approval of this project would be a GREAT INJUSTICE to the communities and environment of Lake Tahoe.

We respectfully ask Placer Planning to deny the Martis Valley West Project. It is a terrible precedent for our area. Please stand up for Tahoe and do the right thing.

Thank you,
Judith Tornese and Jerry Winters
6770 Spring Court
Tahoma, Ca. 96142

PF27-1 cont.

PF27

Judith Tornese and Jerry Winters
June 6, 2016

PF27-1 The comment expresses opposition to the project, citing concerns related to ridgelines and scenic impacts, GHGs, traffic and emergency evacuation. These issues are evaluated in the EIR. The EIR discloses the project's significant and unavoidable impacts in Section 20.1 of the Draft EIR. As explained in Chapter 1 of the Draft EIR, if a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency decision makers, in this case the Placer County Board of Supervisors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; State CEQA Guidelines Section 15093).

The comment also mentions the campground project, the Brockway Campground, a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal.

The comment recommends denial of the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

PF28

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:33 PM
To: Kathi Heckert
Subject: FW: Tahoe Ridgeline

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

-----Original Message-----
From: Don/Pam Wightdonald [mailto:fangwi@charter.net]
Sent: Monday, June 06, 2016 9:36 PM
To: Stacy Wydra
Subject: Tahoe Ridgeline

Do you live in the Tahoe Basin? Please save the Ridgelines. The generations that follow you & me.....will thank you, too. PF28-1

Don & Pam Wight, Tahoe residents

Sent from my iPad to

PF28 Don and Pam Wright June 6, 2016

PF28-1 The comment urges protection of ridgelines. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the project and ridgeline protection into consideration.

mountain area preservation
ESTABLISHED IN 1987

SIERRA WATCH

PF29

Paul Thompson, Interim Agency Director
and Placer County Planning Commissioners
c/o Planning Services Division
3091 County Center Drive

June 7, 2016

Dear Mr. Thompson and Planning Commissioners:

Attached please find our comment letter prepared by the firm of *Shute, Mihaly & Weinberger* on the Final Environmental Impact Report (EIR) for the Martis Valley West Parcel Project and Specific Plan.

Both Mountain Area Preservation and Sierra Watch maintain a long-term commitment to lasting conservation and good planning in Martis Valley, North Lake Tahoe, and Eastern Placer County. We've worked for over fifteen years with landowners, developers, and the County to ensure a responsible blueprint for the region. PF29-1

The Martis Valley West proposal and its EIR, however, represent the opposite of reasoned, collaborative planning. The proposal represents a unilateral attempt by the proponents to force irresponsible development on the region, and the EIR represents an attempt by its authors to evade basic state law.

As made clear in the attached letter, the project would threaten the most fundamental values of North Tahoe and Martis Valley – from the clarity of the lake to the stars in the night sky, from wildfire safety to traffic – the EIR fails to provide even the most basic assessment of impacts on some of the most important issues in the region.

The development's potential impact on the region and the EIR's failure to assess those impacts are compounded by a fatal flaw in the planning process: the attempt to segment development proposed for the Tahoe Basin portion of the property – the attempt to treat the "Brockway Campground" portion of the development as separate and unrelated. This is classic piecemeal planning.

This is unfortunate, not just because of the threat of currently proposed development but, also, because of the missed opportunity for responsible, collaborative planning. Mountain Area Preservation and Sierra Watch hammered out a simple vision in collaboration with the project proponents, the "Martis Valley Opportunity Agreement", signed in 2013.

That agreement called for a switch – and reduction – of land use *designations* from the eastern portion of the property to the west side, with a simultaneous conservation easement for the east side. But the current proposal far outstrips what was agreed to in 2013, in both the total amount of development and the depth of entitlements. PF29-1 cont.

It is our hope that the County can play its leadership role by reigning in this irresponsible proposal and declining to certify this illegal EIR. We urge you to recommend denial of the project and its EIR and, instead, encourage a plan more consistent with the collaborative vision of the 2013 Martis Valley Opportunity Agreement, with state law, and with the values of Eastern Placer County.

Sincerely,

Alexis Ollar, MS & GISP
MAP Executive Director
Alexis@mapf.org
530.582.6751

Tom Mooers
Executive Director, Sierra Watch
tmooers@sierrawatch.org
530.265.2849

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

AMY J. BRICKER
Attorney
bricker@smwlaw.com

June 7, 2016

Paul Thompson, Interim Agency Director
and Placer County Planning Commissioners
c/o Planning Services Division
3091 County Center Drive
Auburn, CA 95603

Re: Final EIR for the Martis Valley West Parcel Specific Plan

Dear Mr. Thompson and Planning Commissioners:

On behalf of Sierra Watch and Mountain Area Preservation ("MAP"), we submit these comments regarding the Final Environmental Impact Report ("FEIR") for the Martis Valley West Parcel Specific Plan ("MVWP" or "Project"). As with the Draft Environmental Impact Report ("DEIR"), the FEIR is fundamentally inadequate under the California Environmental Quality Act, Public Resources Code section 21000 *et seq.* ("CEQA"). We hereby incorporate by reference our letter of December 18, 2015 on the DEIR, including all attachments. In that letter we described many substantive flaws in the DEIR's analysis. As detailed below, the FEIR fails to correct those deficiencies and cannot support approval of the Project. We therefore respectfully request that the Planning Commission recommend denial of the Project. PF29-2

Before explaining the numerous ways that the EIR fails to fulfill the County's legal obligations, we must first alert the Commission to the absurdity of the public review process for environmental documents currently before the County. As the County is aware, there are currently on-going public planning processes for several major development proposals in the region, including the Project, the Village at Squaw Valley Specific Plan, the Squaw/Alpine connected base-to-base gondola, and the Tahoe Basin Area Plan for Placer County. Sierra Watch, MAP, and other community groups are actively engaged in the review of these projects. PF29-3

Given the import of all these proposals, the people of the County deserve the opportunity to review the environmental documents thoroughly and to understand the issues as fully as possible before the Planning Commission makes a recommendation and before the Board of Supervisors makes a decision. Just as importantly they deserve to be

represented by County officials possessed of as much information as is available before making extraordinarily important decisions that would have lasting impacts on the entire Tahoe region. Yet, the public and decision-makers were only given approximately one month to digest volumes of materials for this Project, while at the same time reviewing documents and drafting comments for the other proposals. PF29-3 cont.

Indeed, on May 12, 2016, the North Tahoe Regional Advisory Council ("NTRAC") voted to request that the Planning Commission postpone their hearing on the Project for 30 days to allow adequate review of the FEIR, and to make the Planning Commission aware that there are serious concerns with the Project. Yet, it appears as if the Planning Commission is ignoring this request, as it has scheduled a hearing for June 9, 2016. We reiterate NTRAC's request and urge the Planning Commission to postpone the hearing on the Project for a minimum of 30 days to allow the public and decision-makers a thorough opportunity to review these important matters.

Despite the cramped schedule, we have reviewed the FEIR and find that it, like the DEIR, fails to meet the requirements of CEQA and the CEQA Guidelines, 14 California Code of Regulations section 15000 et seq. (the "Guidelines"). Most glaringly, the FEIR improperly dismisses numerous comments that the EIR's "divide and conquer" strategy—the attempt to divide the property into two projects within and outside of the Tahoe Basin—on the West Parcel constitutes unlawful piecemealing under CEQA. The applicant—and the County—may not so easily avoid CEQA's requirements for holistic project review by simply lopping off a portion of the project/property and submitting it under a separate application. PF29-4

Equally troubling, the FEIR repeatedly attempts to justify the DEIR's perfunctory analysis as appropriate for a "program EIR," claiming that this label frees it from the obligation to perform detailed, site-specific analysis of the Project's impacts. As explained below, this is incorrect. The applicant is asking the County to approve not only a Specific Plan and rezoning but, also, a large lot subdivision and a development agreement. Together, these approvals would irrevocably commit the County to the developer's specific development plan. Regardless of the label, the EIR remains inadequate as an informational document when it fails to conduct a thorough analysis of all of the entire project's significant environmental impacts, as well as to evaluate detailed mitigation or alternatives to reduce or avoid those impacts. PF29-5

The FEIR neither adequately responds to comments previously raised nor cures the legal inadequacies identified by those comments. Rather than revise the EIR to PF29-6

comprehensively analyze, for example, the Project's impacts on biological resources, scenic vistas, traffic, and climate change, the FEIR merely seeks to defend the erroneous assertions and conclusions of the prior document. Where the FEIR does add analysis or make other changes to the document, it fails to acknowledge the significance of the changes, many of which require a recirculation of the document. Additionally, the FEIR fails to adopt feasible mitigation measures identified by comments. Although we identified several clearly feasible measures to reduce, for example, the Project's significant and purportedly unavoidable transportation, night sky, and greenhouse gas ("GHG") emissions impacts, the FEIR rejects the vast majority of these measures. PF29-6 cont.

Thus, the FEIR perpetuates the failings of the DEIR. We will not here reiterate our comments in full. Instead, we detail below some of the FEIR's more egregious shortcomings.

I. The FEIR Fails to Correct the Deficiencies in the DEIR's Project Description and Cumulative Impacts Analysis.

A. The FEIR Does Not and Cannot Justify the Improper Piecemealing of the Project.

In our prior comment letter, we advised the County that revising the proposed Project to remove the development planned for the Tahoe Basin portion of the West Parcel and to simultaneously propose development in that location as a separate project constitutes improper piecemealing under CEQA. FEIR at 3.5-369–3.5-372 (SMW letter). The FEIR claims the EIR's approach is lawful "because the two projects are not part of a single, overarching plan [and] [t]he developments serve different purposes (permanent residences versus a seasonal campground)." FEIR at 3-6. These claims are specious. In fact, the initial Notice of Preparation for the Project reveals the Project proponent's "overarching plan" to develop the West Parcel, including the Tahoe Basin portion. As our prior letter and the DEIR explained, the initial Specific Plan was revised to exclude the Tahoe Basin portion to avoid "controversy." FEIR at 3.5-369; DEIR at 2-7. PF29-7

If a project proponent could avoid CEQA's requirement to analyze the "whole of the action" merely by separately proposing any controversial parts of its project and then labeling them with a different purpose (such as "commercial uses" versus "residential uses"), CEQA's requirement would become virtually meaningless. The present situation presents a classic case of segmentation whereby "environmental

considerations . . . become submerged by chopping a large project into [] little ones…which cumulatively may have disastrous consequences." *Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 283-84.

The FEIR relies heavily on *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209 (FEIR at 3-6), but that reliance is misplaced. The primary factor considered by *Banning Ranch* in concluding that two neighboring projects need not be considered in the same EIR was that the projects were proposed by "different project proponents." *Id.* at 1226 (citation omitted). Here, the FEIR admits that the two proposals "have the same applicant and land owner." FEIR at 3-7. The FEIR also admits that (1) the proposals "are being proposed at roughly the same time," (2) the proposed developments "border each other," and (3) "Placer County is the same approving agency for both proposals," but claims these factors are unimportant. FEIR at 3-6, 3-7. In fact, the court in *Tuolumne* found that where proposals "are related in: (1) time, (2) physical location and (3) the entity undertaking the action" . . . "the potential for related physical changes to the environment in that location is greater than otherwise. Thus, the need for a single review of the environmental impact of the two acts is greater." *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1227. PF29-7 cont.

An assessment of piecemealing under CEQA is necessarily fact specific, and the facts here demonstrate that a consolidated environmental review is warranted. To allow otherwise would enable the applicant to escape a full and complete analysis of holistic ways to avoid or reduce the significant environmental impacts of development on the West Parcel. *See* FEIR at 3.5-371 (SMW letter, explaining purposes behind consolidated review). For example, the present EIR washes its hands of any suggested mitigation measure or alternative involving the Tahoe Basin portion of the West Parcel, simply by claiming "the Brockway Campground proposal is a separate project undergoing its own environmental review, and no development is proposed for this location associated with the MVWPSP." FEIR at 3-42. Yet, the FEIR does not and cannot deny that the two endeavors do or could share common features, such as emergency roadway access (including to/from SR 267), water and sewer infrastructure, and amenities, which could be more comprehensively planned and reviewed in one environmental document. *See* FEIR at 3-7 (recognizing the proposals share the

Fibreboard Freeway for emergency access); FEIR at 3.5-426 (response to comment I041-5).[1]

Nor does the EIR's alleged cumulative impact analysis correct this deficiency.[2] As our prior letter explained, nowhere does the cumulative impact analysis give an indication of what the Project's impacts would look like in combination with the Brockway Campground proposal. *See* FEIR at 3.5-374–3.5-375. The FEIR's response boils down to a "trust us" statement, claiming the requested analysis was considered when the environmental impact analyses were prepared. *See* FEIR at 3.5-427 (response to comment I041-11). But the purpose of the EIR's cumulative impact analysis is to view significant impacts in a holistic manner and to evaluate ways to avoid or reduce them. As discussed above, the EIR uniformly rejects any measures involving the Tahoe Basin portion, claiming it is not part of the Project. Such an approach cannot withstand scrutiny under a proper cumulative analysis, especially given the proximity (in both time and location) and common ownership of the two proposed endeavors. PF29-7 cont.

B. The EIR Misrepresents the Nature of the Project.

Our prior letter noted that the DEIR lacked essentially information about the Project, including the nature of the approvals being requested by the applicant at this time, versus in subsequent phases. *See* FEIR at 3.5-372–3.5-373. We thank the County for providing additional information about the approval process, including being clear that the initial approvals involve the adoption of a development agreement ("DA"). *See* FEIR at 3.5-426–3.5-427. However, we disagree with the FEIR's conclusion that a DA "is a financial document and is not necessary to understand the environmental impacts and mitigation measures associated with a project." FEIR at 3.5-426. PF29-8

[1] The FEIR also baldly claims that the Water Supply Assessment ("WSA") does not apply to the development proposed for Brockway. FEIR at 3.5-426 (response to comment I041-5), 3-7. However, it is indisputable that the Water Supply Assessment covered the Brockway development area when it was previously proposed as part of the Project. Thus, the County cannot guarantee that the WSA will not help facilitate the Brockway Campground proposal.

[2] The EIR's failure to properly analyze cumulative impacts in each environmental impact category is discussed throughout our December 18, 2015 letter on the DEIR and in the remainder of this letter.

As we explained in our prior comments, DAs lock in vested rights to a certain development plan (FEIR at 3.5-373) and thereby are extremely relevant to the environmental review for that development. The DEIR asserts that it was prepared as a Program EIR for a "framework" for a flexible development. DEIR at 3-7. A development agreement, by contrast, is very inflexible. A general, first-tier program-level EIR is appropriate for a (typically long-range) planning or policy document, like, a general plan for a city or county, a long-range development plan for a university campus, or an overarching Master Plan for future uses of a large infrastructure facility like a port. *See e.g.*, *Al Larson*, 18 Cal.App.4th 729 (master plan for port); *Save the Sunset Strip Coalition v. City of West Hollywood* (2001) 87 Cal. App. 4th 1172 (general plan). These plans identify overarching policies and *types* of future projects, as well as general *areas* where such projects might be built. They do not make commitments to concrete, specific development projects. Analyzing such plans at a broad level, concentrating on the impacts that are common to all the individual projects, makes sense. PF29-8 cont.

A generalized, "programmatic" analysis that glosses over project components is entirely inappropriate for the approval of this Project, which involves approval of a specific development plan, a rezoning, a development agreement, and tentative and final subdivision maps. According to the proposed DA here, the developer "shall have a vested right to develop up to 760 dwelling units and up to 6.6 acres of commercial development (up to 34,500 square feet of commercial and 22,000 square feet of homeowner amenities) on the portion of the West Parcel (662 acres) that is designated for such uses." Proposed Development Agreement at 5. Where, as here, a precise site has been delineated and specific facilities are in the works, the lead agency has a statutory mandate to produce a "detailed statement setting forth . . . [a]ll significant effects on the environment of the proposed project." Pub. Res. Code § 21100(b)(1); *see also Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal. App. 4th 182.

The specific plans for the proposed Project are unquestionably the type of "particularly described facets" that were also at issue in *Stanislaus Natural Heritage Project*. 48 Cal.App.4th at 203. There, the court found that the county's amendment of its general plan to include a plan for Diablo Mountain resort, was itself a "project," thus requiring a specific, project-level analysis of the significant environmental effects of that project. *Id.* at 202. Here, Placer County is even farther along: it is processing an application for a specific plan, rezoning, development agreement, and large-lot tentative and final subdivision maps for the Project. But Placer County, like Stanislaus County in *Stanislaus Natural Heritage Project*, has produced a "program" EIR that is chock full of

deferred analysis and mitigation and does not sufficiently analyze the long-term environmental impacts of the envisioned final project.

CEQA's promise is that the environmental consequences of a development of this magnitude will be "considered before, not after, [the decision to approve the project] is made." *Id.* at 196. Analysis of the known and reasonably foreseeable environmental impacts of the entire project is fundamental to informed decision-making. *Id.* at 199. Whatever the title on the EIR's cover, the document must fully define the "project." It is crucial to provide sufficient meaningful information up front about the reasonably foreseeable effects of the final project, and options for mitigation, otherwise the public and decision-makers have no way of knowing exactly what they are approving. *Id.* at 202, 206. PF29-8 cont.

Thus, the EIR must be revised and recirculated to adequately analyze and mitigate the specific significant environmental impacts caused by the detailed development approvals before the County at this time. It must not defer this analysis and mitigation to a later conformity review process. Moreover, as our prior letter explained, a recirculated EIR must include sufficient details to ensure preservation of the East Parcel, which the EIR touts as a "central component" of the Project. FEIR at 3.5-427 (response to comment I041-9); *see also* FEIR at 3.5-373. This includes mechanisms to ensure preservation until the area is either purchased by a conservation organization or a conservation easement is in place providing for permanent preservation, as well as funding mechanisms to ensure preservation both before and after an easement or acquisition takes place. Currently, the EIR fails to deliver on this "central component" of the Project and its alleged environmental benefits, by failing to spell out or guarantee protection of the East Parcel. The FEIR's failure to adequately respond to this comment is unacceptable. *See Flanders Foundation v. City of Carmel-by-the-Sea* (2012) 202 Cal.App.4th 603, 616.

In sum, the EIR's project description remains incomplete and inaccurate. The DEIR must be revised and recirculated to analyze the whole of the project, including the development planned on the Tahoe Basin portion of the West Parcel. Further, the recirculated DEIR must analyze and mitigate the whole project's significant environmental impacts utilizing a level of detail that is commensurate with the approvals pending before the County.

II. The FEIR Fails to Correct the Deficiencies in the DEIR's Analysis and Mitigation of the Project's Significant Environmental Impacts.

A. The EIR's Analysis of Impacts to Biological Resources Remains Inadequate.

1. The EIR Continues to Rely on Preservation of the East Parcel to Claim the Project Will Have Less than Significant Biological Impacts, in Violation of CEQA.

We commented that a number of the DEIR's analyses of impacts to biological resources improperly relied on conservation of the East Parcel to support the conclusion that the Project would have less-than-significant impacts on those resources. FEIR at 3.5-375 (SMW letter, comment IO41-13). As we explained, the proper approach is to first analyze the significant impacts of the Project on biological resources, such as through habitat destruction or modification, and then to assess feasible measures to avoid or lessen such impacts, such as by conservation efforts. In short-circuiting this process, the EIR subverts informed decision-making by failing to reveal the full extent of Project impacts, fails to consider all appropriate mitigation measures and analyze their effectiveness, and precludes public participation—all serious, prejudicial errors. The County's attempts in response to justify its legally deficient analyses do not hold water. PF29-9

First, the County argues that, while it noted the "benefits of preserving the East Parcel . . . impacts on biological resources on the West Parcel were not treated as being 'mitigated' by benefits of preserving the East Parcel." FEIR at 3.5-428 (response to comment IO41-13). This is simply not true. As we pointed out in our earlier comments, the DEIR based its less-than-significant determination for impacts to the California spotted owl and northern goshawk in part on preservation of the East Parcel. *See* DEIR at 7-54. The County claims that it merely "disclosed" the "[b]enefits of preserving the East Parcel . . . as part of the impact analysis leading to the significance conclusion," but that the preservation was not key to its significance determination. FEIR at 3.5-428-29 (response to comment IO41-13).

In reality, the EIR is clear—its determination that the Project's impacts to owl and goshawk habitat would not meet threshold significance criteria is indeed based in part on the fact that "the loss of up to 169 acres of suitable foraging habitat on the West Parcel would be *offset* by the redesignation and long-term conservation of 198.2 acres of suitable foraging habitat presently zoned for development." DEIR at 7-54 (emphasis added). This is one of the four clearly enumerated reasons that the EIR gives for determining that the Project will have a less-than-significant impact on owl and goshawk

habitat, despite removing 169 acres of suitable foraging habitat in the West Parcel. This is, essentially, relying on the East Parcel's preservation to "mitigate" the loss of habitat in the West Parcel—or why else would this information be necessary to the EIR's conclusion that the Project would not have a significant impact on these birds? CEQA does not allow an EIR to fold what is effectively an assumed mitigation measure into a significance determination—the project's significant impacts must be determined first, and then the EIR must identify enforceable mitigation that will "offset" the impacts. *See Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656.[3]

PF29-9 cont.

Despite the County's claim that the case is inapposite here, the *Lotus* case is actually right on point. As the County acknowledged in its response to comments, *Lotus* held that an EIR was legally inadequate where it assumed certain mitigation techniques would be incorporated into the project, and thus the EIR did not disclose the impacts of the project without those special techniques. FEIR at 3.5-429 (response to comment IO41-13); *see also Lotus*, 223 Cal.App.4th at 656. Further, the court in *Lotus* held that the EIR there was inadequate because it "fail[ed] to discuss the significance of the environmental impacts apart from the proposed 'avoidance, minimization, and/or mitigation measures' and thus fail[ed] to consider whether other possible mitigation measures would be more effective." *Lotus*, 223 Cal.App.4th at 657. As we explained in our comments on the DEIR, such is the case here: the EIR relies on preservation of the East Parcel as a key factor in its determination that impacts to the California spotted owl and northern goshawk would be less than significant. *See* FEIR at 3.5-375-76 (SMW letter, comment IO41-13). In so doing, the EIR fails to reveal the true nature of the impacts and consider other feasible mitigation measures and their effectiveness, in violation of CEQA.[4]

---

[3] The County also tries to claim that it is the commenter's responsibility to provide it with some evidence that there would be a significant impact on these species. FEIR at 3.5-428 (response to comment IO41-13). We are not arguing with the facts underlying the County's significance determination; we are warning the County that its impacts analysis is legally deficient. It is evident to even the casual observer that destruction of up to 169 acres of suitable foraging habitat would result in a significant biological impact. Under CEQA, it is the EIR's job to evaluate just how significant this impact would be, and to consider all feasible measures to lessen or avoid the impact.

[4] Conflating environmental analysis and mitigation is also prejudicial because CEQA contains special requirements to ensure monitoring and enforcement of mitigation

Considering alternate mitigation is especially important here, where preservation of the East parcel is part of the Project and merely protects the status quo by keeping the parcel as undeveloped forest land. As we explained, a proper CEQA analysis must compare the Project's impacts to existing conditions, not what is theoretically allowed to be built under the General Plan. The County claims that it has not relied on an improper baseline because it is not comparing the Project's impacts to a hypothetical full buildout of the East Parcel. FEIR at 3.5-428. Instead, the County argues that it merely "notes" the benefits of preserving the East Parcel.

However, the EIR repeatedly emphasizes that preserving the East Parcel will change what could have been developed on the East Parcel, implying that the existing environmental condition will somehow be bettered by the East Parcel's preservation. *See, e.g.*, DEIR at 7-43 (one reason that impacts to common habitat types would be less than significant is "because the East Parcel would be preserved, 665.9 acres of conifer forest and other common habitats presently zoned for potential development would be conserved in perpetuity"); 7-54 (stating Project would place East Parcel under conservation easement, thus protecting 265.5 acres of California spotted owl and northern goshawk habitat from development); 7-56 (same for 149.2 acres of mule deer habitat).

The EIR's continued reliance on preservation of the East Parcel in its discussion of the Project's direct impacts paints the preservation as somehow lessening the Project's impacts. But because this preservation merely keeps the property in its present condition, it is irrelevant to analyzing the direct impacts of the Project's *changes* to the existing environment. The East Parcel's preservation does nothing to alter those direct impacts. Implying that preservation of the East Parcel does anything to reduce the Project's direct impacts from developing the West Parcel is misleading and detracts from the EIR's value as an informative document and tool for decision-making. PF29-9 cont.

2. The FEIR Fails to Correct the DEIR's Inadequate Analysis of the Project's Impacts on Special-Status Plant Species.

We also commented that the DEIR failed to comply with CEQA because it deferred evaluating the Project's impacts on special-status plant species. Specifically, the County failed to survey for those species and describe their presence in the Project area in PF29-10

---

measures. CEQA Guidelines §§ 15097(a), 15126.4(a)(2). If the mitigation is subsumed within the analysis and not included as a separate measure, it would escape these requirements.

the EIR. FEIR at 3.5-378 (SMW letter, comment IO41-15). In response, the County tries to excuse this incomplete description by labeling the EIR a "program level" document. FEIR at 3.5-430 (response to comment IO41-15). As we explained above, the County cannot evade the detailed analysis required by CEQA merely by declaring the document a "program EIR"—it is the actual nature of the project that matters. And here, the nature of the Project calls for a more specific description of the environmental setting than the EIR provides. *See* Section I.B.

Programmatic EIRs may contain more general information when there are unknown details of future actions. *See* Section I.B. Here, this is not the case, despite the County's claims to the contrary. Rather, this Project would involve detailed initial approvals including a development agreement. *See* FEIR at 3.5-426-27. Because development agreements secure vested rights to specific development, a "programmatic" EIR is inappropriate here. *See* Section I.B. With the Project's parameters quite certain at this point, surveys could have been conducted from the outset—and should have been, to fully inform the public and decision-makers of the Project's environmental setting. PF29-10 cont.

And, as we commented, that some of the EIR's proposed mitigation measures would require surveys prior to construction does not change the fact that, without those surveys now, the public and decision-makers cannot assess the Project's potential impact on biological resources, nor can adequate mitigation be developed. *See* FEIR at 3.5-378 (SMW letter, comment IO41-15) (citing *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 301, 306-07; *San Joaquin Raptor Center v. County of Merced* (2007) 149 Cal.App.4th 645, 671-72). Some deferred study may be appropriate in certain program-level documents, but here, the proposed Project is much more definite, and the level of impact analysis done now must reflect that.

3. The EIR's Cumulative Impacts Analysis Remains Inadequate.

Finally, we commented that the DEIR's cumulative impacts analysis was flawed because it relied on inadequate mitigation measures to conclude the Project would not have a substantial contribution to cumulative impacts to special-status species. FEIR at 3.5-381 (SMW letter, comment IO41-18). The County, however, claims that the mitigation measures are adequate, and thus its cumulative impacts conclusions are properly supported. FEIR at 3.5-433 (response to comment IO41-18). But these mitigation measures do not mitigate *all* of the Project's impacts that may contribute to cumulative impacts. Specifically, the incremental, less-than-significant direct impacts to special-status birds from the Project's operations will not be addressed by the EIR's PF29-11

mitigation, and thus may contribute to cumulative impacts. The EIR must make this analysis.

In its defense of Mitigation Measure 7-5a—on which the EIR's cumulative-impacts analysis relies for its determination—the County admitted that the measure did nothing to mitigate any of the Project's operational impacts on certain bird species. FEIR at 3.5-432 (response to comment IO41-16). The DEIR disclosed that "construction *and operations and maintenance activities* could also result in noise, dust, and other disturbances to nesting birds in the vicinity, potentially resulting in nest abandonment and mortality to eggs and chicks." DEIR at 7-57 (emphasis added). As the County admits in its response to comments, Mitigation Measure 7-5a would do nothing to mitigate these operational impacts on birds. FEIR at 3.5-432 (response to comment IO41-16). Accordingly, the EIR cannot conclude that this construction-focused mitigation measure would prevent the Project from having a cumulatively considerable contribution to impacts to special-status wildlife from *operational* impacts. Indeed, the EIR fails to discuss at all the potential of operational impacts on these birds to contribute to a cumulatively considerable significant impact. *See* DEIR at 7-63 – 7-64. This analysis is especially important in light of the simultaneously planned construction for the adjacent Brockway Campground. By failing to consider a known, unmitigated potential contribution to cumulative impacts, the EIR violates CEQA. PF29-11 cont.

B. The EIR's Analysis of, and Mitigation for, the Project's Visual Impacts Remain Inadequate.

1. The FEIR Errs in its Justifications for Failing to Provide a More Detailed Analysis of the Project's Visual Impacts.

In our letter on the DEIR, we explained that an analysis of the Project's effect on visual resources was of paramount importance since certain portions of the Project site would be visible from famously scenic locations such as Martis Valley, Lake Tahoe, and the greater Tahoe Basin. As an initial matter, we criticized the DEIR's visual resources analysis because it was based on a conceptual site plan that illustrated one general scenario of how the Specific Plan could be implemented, without actually depicting what the community would look like. FEIR at 3.5-381, 382 (SMW letter, comment I041-19). The FEIR asserts that the lack of detail is justifiable because it is a program EIR. *Id.* at 3.5-433. As discussed above, this does not excuse preparation of analysis that is appropriate for the proposed development plan. PF29-12

The FEIR also asserts that its approach to environmental review is adequate because it analyzed a "worst case" scenario of the Project's visual effects. As discussed below, the EIR's analysis of the Project's visual effects does not come close to depicting a worst case scenario. In fact, in many instances, the EIR refuses to include the necessary photographic simulations that would allow the public to judge for itself the severity and extent of the Project's impact on the area's scenic resources. In other instances, the EIR misleads the public by making inaccurate statements that are designed to sidestep the serious criticism that this Project would irreparably degrade the unique visual character of the site and its surroundings. PF29-12 cont.

2. The FEIR Lacks the Necessary Evidentiary Support for Its Conclusion that the Project Would Not Have a Substantial Adverse Effect on a Scenic Vista.

Numerous members of the public submitted extensive comments documenting the Project's potential to adversely affect views from numerous scenic locations in and around the Tahoe Basin. These individuals expressed particular concern, for example, about views from the Tahoe Rim Trail. *See, e.g.*, FEIR at 3.5-383 (comment I041-21); FEIR at 3.5-117 (comment I018-52). The Tahoe Rim trail is considered one of the world's premier trails. Accessible by hikers, equestrians, and skiers, it winds around spectacular Lake Tahoe. PF29-13

As the DEIR clearly shows, the Project site abuts the Tahoe Rim. *See* DEIR Exhibit 3-3 (showing the alignment of the Tahoe Rim Trail immediately adjacent to the Project site); DEIR Exhibit 3-7 (showing the location of the Project's multi-family condominiums and commercial land uses along the Project's southern boundary); DEIR at 9-26 (showing another view of the structures on the Project site's southern boundary); and DEIR at 3-18 (stating that the Project's condominiums could be up to 75 feet in height and the commercial structures could be up to 60 feet).

Members of *local* environmental organizations including Friends of West Shore and the Tahoe Area Sierra Club who are very familiar with the Trail and views from the Trail provided ample evidence that the Project has the potential to visually intrude on views from the Trail (and multiple other locations within the Tahoe Basin). *See* FEIR at 3.5-109—3.5-124 (comments I018-41—I018-62). These statements constitute substantial evidence that the proposed Project may have a significant visual impact. In *Oro Fino Gold Mining Co. v. County of El Dorado* (1990) 225 Cal.App.3d

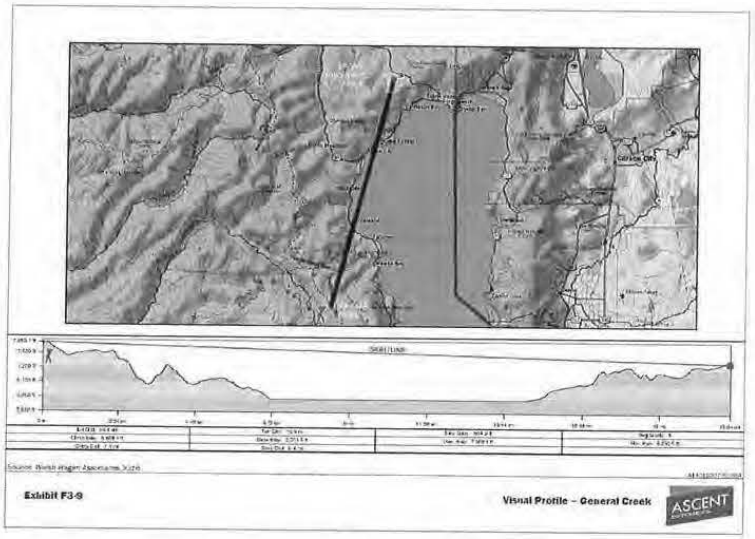
872, 882, the Court held that personal knowledge about impacts in a project area constitutes substantial evidence of a potentially significant impact.

Given the immediate proximity of the Trail to the Project's buildings, numerous members of the public requested that photographic simulations be provided at multiple locations along the Trail so that the public could be apprised of exactly how the Project would appear from the Trail. *See e.g.*, FEIR at 3.5-382—3.5-384 (comment I041-20—I041-25); FEIR at 3.5-109—3.5-124 (comments I018-41—I018-62). Despite these reasonable requests, the FEIR preparers refuse to provide *any* simulations of views from the Trail.

PF29-13 cont.

Instead, the FEIR takes a couple different tacks. First, it takes a "trust us" approach when it asserts that views from the Trail were "considered" and that photographs taken from the Trail suggest simulations were unnecessary because a ridge and substantial tree coverage "block" the Trail from the development area. FEIR at 3.5-434 (response to comment I041-21). We are unable to locate in the EIR any of the photographs that were purportedly taken from the Trail. Moreover, the EIR contradicts itself regarding the Project site's visibility from the Trail. For example, the DEIR states that the development area would be "largely screened" from the Trail, and the FEIR also concedes that views of the Project from the Trail would be screened, rather than blocked. *See* DEIR at 9-32; *see also* FEIR at 3.5-435 (response to comment I041-21, stating that "these photographs confirm that views from the trail would be screened."). The fact that the Project's structures *may* be screened from hikers along the Tahoe Rim Trail offers no assurance that the Project would not substantially degrade the visual quality of the Trail. Even if partially screened by trees, a view of condominiums, stores, and restaurants would clearly detract from the Trail's natural, undisturbed setting. This is both a significant visual and recreational impact.

Second, apparently recognizing the obligation to provide some sort of documentation about views from the Trail, the FEIR includes a few "visual profiles," which purport to evaluate the visibility of the Project from the Trail. *See* FEIR at 3-13 and Exhibits F3-9 through F3-12 (located prior to FEIR page 3.5-189). Yet, as shown below, these visual profiles are not valid substitutes for simulations; they simply provide a rudimentary schematic showing the sightline between a viewer and the Project site.



PF29-13 cont.

Even worse, not one of these visual profiles is taken from a location on the Trail that is close to the Project itself. Rather, they are taken from distances ranging from five to more than 19 miles away![5] Not surprisingly, the FEIR concludes that the proposed Project would not be discernable from the Tahoe Rim Trail. FEIR at 3-13.

The EIR may not use these visual profiles to reach its conclusion that the Project would not have a significant adverse effect on scenic vistas from the Tahoe Rim Trail. An EIR may not rely exclusively on a tool for a finding of insignificant impacts if other substantial evidence in the record demonstrates that the Project may actually cause significant impacts. *Communities for a Better Env't v. California Resources Agency* (2002) 103 Cal.App.4th 98, 112-13 (thresholds of significance cannot be used as binding standards that foreclose the use of other evidence to demonstrate that a project may have significant effects); *Protect the Historic Amador Waterways v. Amador Water Agency*

[5] Exhibit F3-9 (Visual Profile – General Creek) shows the visual profile from General Creek, a distance of more than 19 miles away from the Project site. Exhibit F3-10 shows the visual profile from Marlette Peak, a distance of more than 10 miles away from the Project site. Exhibit F3-11 shows the visual profile from Mount Baldy, a distance of more than five miles from the Project site. Exhibit F3-12 shows the visual profile from South Camp Peak, a distance of more than 17 miles from the Project site.

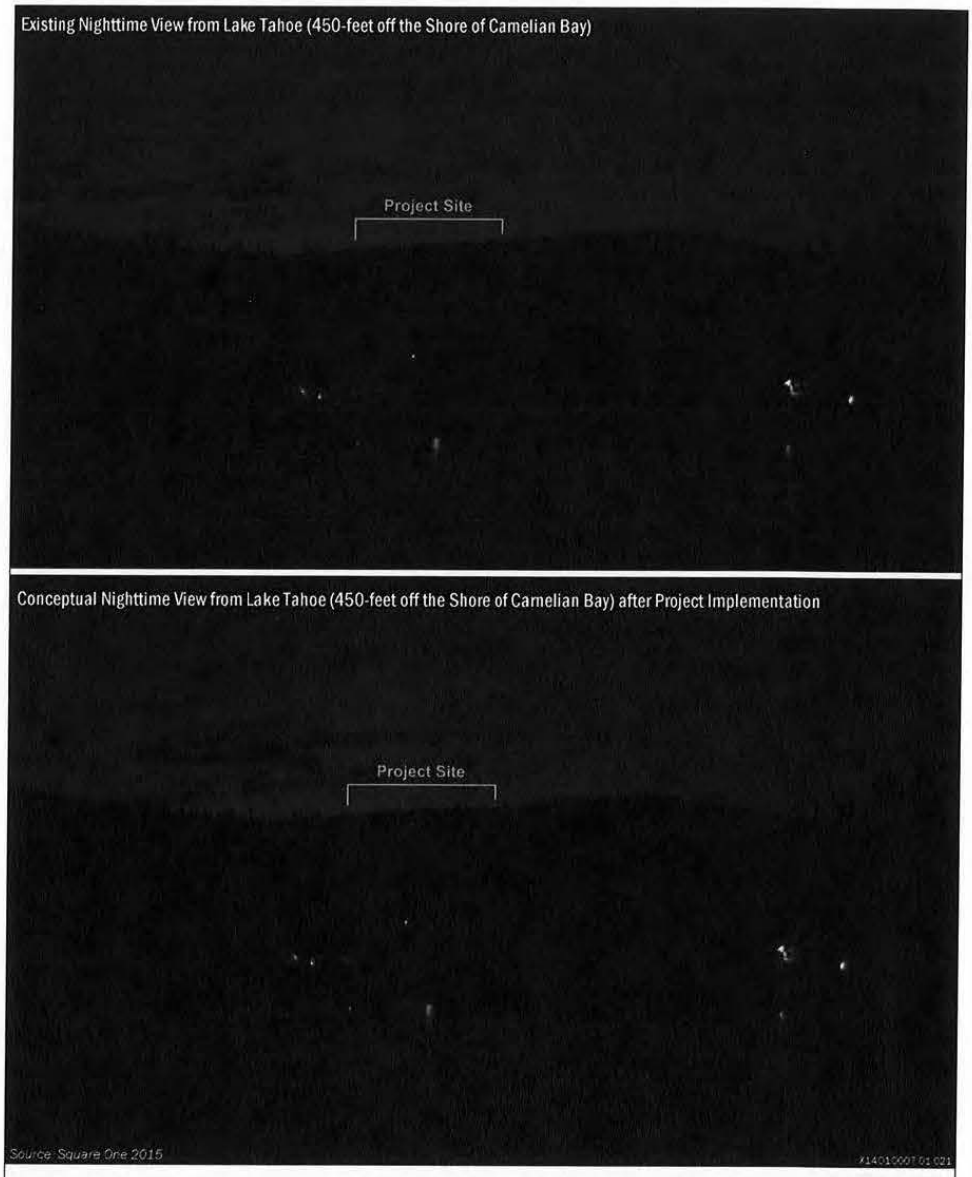
(2004) 116 Cal.App.4th 1099, 1109 ("in preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met"). As discussed above, the Friends of West Shore and the Tahoe Area Sierra Club provided ample evidence of the Project's significant visual effects. PF29-13 cont.

In sum, as documented above, the EIR fails to support with substantial evidence its conclusion that the Project would have a less than significant effect on scenic vistas. If the EIR preparers truly want to demonstrate that the Project would have *no* impact on views from the Tahoe Rim Trail, they should provide the photographic simulations from the Trail. The EIR's refusal to make this information available, despite repeated requests by the Public, is particularly disingenuous.

3. The FEIR Fails to Correct the Deficiencies in the DEIR's Analysis of, and Mitigation for, Nighttime Views.

Despite our detailed comments explaining the inadequacies in the DEIR's analysis of the Project's impacts on dark skies and nighttime views, the FEIR fails to resolve these deficiencies. For example, we explained that because the DEIR failed to provide *any* information about its methodology for evaluating the Project's lighting impacts, the DEIR lacked the evidentiary basis to conclude that the Project's impacts would be less than significant. FEIR at 3.5-385 (comment 1041-26). We also explained that, notwithstanding the DEIR's faulty impact analysis, its visual simulations taken from Lake Tahoe (Exhibit 9-33) and Martis Valley (Exhibit 9-34) clearly show that the Project would lighten the night sky considerably. PF29-14

In response to our comments about the photo simulations from Lake Tahoe and Martis Valley, the FEIR again attempts a few different tacks. With regard to our comment about views from Lake Tahoe, the FEIR authors tell us that we are just wrong as "there is not a discernible difference in the night sky conditions between the photograph and the photo simulation." FEIR at 3.5-436 (response to comment 1041-26). We respectfully disagree. As the following DEIR photo simulation shows, the Project would result in a night sky that is visibly lighter than existing conditions.



PF29-14 cont.

Exhibit 9-33 **Nighttime views from KOP 4, Lake Tahoe 450 feet from Shore before and after Project Implementation**

ASCENT ENVIRONMENTAL

SHUTE, MIHALY & WEINBERGER LLP

The purpose of a simulation is to simulate reality, i.e., to accurately show how the Project would appear if built so that the public is able to judge for itself the change in the physical environment. We question the County's rationale for using photo simulations if the EIR authors can simply choose to interpret the results in a manner that they see fit. Clearly, the EIR authors were hoping that the public would come to a different conclusion. Yet, we were not the only ones to comment on the Project's effect on night skies from Lake Tahoe. The Friends of West Shore and the Tahoe Area Sierra Club also expressed concern about the Project's adverse effect on dark skies. *See* FEIR at 3.5-127 (comment I018-67).

With regards to our comment that the simulation from Martis Valley also shows a considerable lightening of the night sky, the EIR preparers agree. Yet, here, they assert that the difference in color was due to an error in the DEIR's methodology, a "file compression inconsistency." *Id.* at 3.5-436 (response to comment I041-26). The FEIR then states that the problem was "corrected." *Id.* Not surprisingly, the new simulation conveniently shows no lightening of the sky. PF29-14 cont.

It is to avoid differences of opinion and apparent analytical errors that the EIR must disclose its methodological approach to evaluating the Project's impacts on dark skies. The FEIR asserts that it provides additional detail on its methodology. For example, the FEIR states that it modeled picture windows 5-7 feet in height. FEIR at 3.5-438 (response to comment I041-26). But, this type of information is not analytic methodology; rather it states the authors' modeling assumptions.

To be adequate, the EIR's evaluation of the Project's impact on nighttime views must: (1) establish a nighttime light baseline assessing the quality of dark skies; (2) include a thorough description of the Project's increase in lighting in terms of spectrum, shielding and amount of light; and (3) establish appropriate significance thresholds to judge if the increase in light would be substantial. Only upon completion of this analysis will the EIR authors be in a position to evaluate whether measures exist to mitigate this impact.

(a) The EIR Fails to Establish a Baseline for Assessing the Quality of Dark Skies. PF29-15

The "environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant." Guidelines § 15125(a). This requirement is crucial to a valid EIR: "Knowledge of the

regional setting is critical to the assessment of environmental impacts. . . . The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." Guidelines § 15125(c). In other words, it is impossible for an EIR to fulfill its informational purpose when it is only revealing part of the picture for a potential environmental impact.

In order to accurately evaluate the Project's light impacts, one must first establish a nighttime light baseline assessing the quality of dark skies. As the attached article authored by the International Astronomical Union explains, it is certainly possible to monitor the quality of the night sky and light pollution. Cameras that are able to save images in an unaltered raw format can be calibrated to get measurements of the luminance of the sky in a physical scale. Then the photo of the night sky can be converted to false color impacts, which represent the distribution of sky brightness. *See* Using a Digital SLR Camera to Monitor Light Pollution, Dark Skies Awareness, International Astronomical Union, attached as Exhibit 1. PF29-15 cont.

Ideally, photographs taken to establish the night sky baseline would be taken on a clear night with little or no moon. Photographs of the existing setting should also be taken when skies are at their darkest. The photograph of existing nighttime views from Martis Valley, for example, was taken at approximately 6:00 p.m. on January 2, 2015. FEIR at 9-48. While it does get dark comparatively early in the winter, it is unclear whether it is fully dark at 6:00 p.m. Any last remnants of daylight would lead to the false impression that the existing night sky is lighter than it really is, thereby diminishing the effect of the Project.

(b) The EIR Fails to Document the Project's Lighting and to Evaluate the Effect that this Lighting Would Have on the Night Sky.

Once a proper baseline is established, the EIR must then evaluate how the Project's lighting sources would impact dark skies. To undertake this analysis, as we explained previously, the EIR must take into account three aspects of lighting: (a) shielding of fixtures; (b) spectrum of light sources; and (c) amount of light. FEIR at 3.5-385 (SMW letter, comment I041-26). We provided detailed methodological guidance for evaluating light and glare impacts prepared by the Dark-Sky Association, a recognized authority on light pollution and the leading organization combating light pollution worldwide. *See* FEIR, Appendix T, Ex. 5 (Dark Matters!, Dark-Sky Coalition), PF29-16

at 3. In its guidance, the Dark Skies Coalition explains these aspects of lighting are easily quantifiable.

Unfortunately, like the DEIR, the FEIR makes no attempt to quantify the Project's lighting aspects; instead it states that such an analysis is not possible because the technical specifications of the light sources are unknown. FEIR at 3.5-438. It then asserts that the EIR preparers used other residential projects (referred to as "in-kind" projects) as a predictor of the brightness and spectrum of the proposed Project. *Id.* at 3.5-438. Yet, the EIR does not provide any information about these other residential developments that would allow us to determine whether they are in any way representative of the nature and size of the proposed Project. For example, the EIR never discloses the total lighting (lumen) expressed as lumens per acre from the "in kind" residential development. It also does not disclose any information about the spectrum of light sources in the "in-kind" residential developments.

PF29-16 cont.

In light of these omissions, the DEIR has no basis to reach its conclusion that the Project would not significantly impact the area's dark skies. Although it may sometimes be appropriate to use "in-kind" projects to determine whether a project's light impacts would be significant, agencies must use the simulation correctly, and they may not rely exclusively on this approach for a finding of insignificant impacts if other substantial evidence in the record demonstrates that the Project may actually cause significant impacts. *See Protect the Historic Amador Waterways,* 116 Cal.App.4th at 1109. Nor may the EIR rely on this in-kind simulation if it fails to accurately measure the particular environmental effects caused by the Project. *Id.*

Local environmental organizations including Friends of West Shore and Tahoe Area Sierra Club echoed many of our comments on the DEIR's inadequate analysis of impacts to night skies. Unfortunately, the FEIR fails to resolve the deficiencies identified by these organizations and also fails to adequately respond to those comments. *See* FEIR 3.5-14 (beginning at comment I018-63). For example, the organizations explained that the DEIR ignored impacts to the night sky from numerous locations such as the Tahoe Rim Trail, above Sand Harbor, Pacific Crest Trail, Cave Rock, and other scenic areas around the entire Tahoe Basin. FEIR at 3.5-125. The FEIR refers the reader to Master Response 4, yet this Master Response confirms that no nighttime simulations were prepared at these locations. FEIR at 3-14. In fact, this Master Response makes the deficiencies in the DEIR's analysis crystal clear.

In particular, the FEIR's Master Response explains that 70 profiles were prepared from 44 separate viewpoints for purposes of analyzing the Project's visual impacts, i.e., daytime impacts. FEIR at 3-13. Yet, in what would appear to be an egregious error, dark sky simulations were prepared for just three viewpoints, including the Martis Valley Trailhead, on the Fibreboard Freeway, and off the shore of Carnelian Bay. *Id.* at 3-14. We can find no logical explanation as to why the dark sky analysis did not take into account the same 44 viewpoints that were apparently used to evaluate the Project's daytime impacts. PF29-16 cont.

(c) The EIR Fails to Include Thresholds of Significance.

Determining whether a project may result in a significant adverse environmental effect is one of the key aspects of CEQA. Guidelines § 15064(a) (determination of significant effects "plays a critical role in the CEQA process"). CEQA specifically anticipates that agencies will use thresholds of significance as an analytical tool for judging the significance of a Project's impacts. *Id.* § 15064.7. A threshold is a numeric or qualitative level, compliance with which means impacts are normally less than significant and non-compliance with which means impacts will normally be significant. CEQA Guidelines § 15064.7(a); *see also Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1107. PF29-17

Thus, one of the first steps in any analysis of an environmental impact is to select a threshold of significance. Here, the EIR contains no thresholds of significance for determining whether the Project would create a new source of substantial light that would adversely affect nighttime views in the area. This flaw leads to a cascade of other failures: without a threshold, the EIR cannot do its job. For example, the FEIR asserts that although lights from the Project would be visible from Martis Valley, this impact would be less than significant. FEIR at 3.5-436 (response to comment 1041-26). The document provides *no* standard by which to evaluate this impact's significance. The photo simulation of Lake Tahoe discussed above is a perfect example of why an EIR must include significance thresholds. Had the EIR included such thresholds, there would be little or no dispute as to whether the Project's lighting would substantially affect Lake Tahoe's night sky—instead of relying on the EIR author's subjective interpretation. As discussed above, given that the amount, shielding and spectrum of light are easily quantifiable, the revised EIR should identify quantifiable thresholds for determining impacts to the area's night skies.

(d) The EIR Fails to Analyze the Cumulative Light Impacts on the Night Sky.

In our prior letter, we commented that the DEIR failed to adequately analyze the Project's cumulative impacts on nighttime views. FEIR at 3.5-387 (SMW letter, comment I041-28). For example, although the DEIR correctly determined that the cumulative effects on views from Martis Valley would be cumulatively considerable, the DEIR failed to actually analyze this impact. Instead, it offers a vague proclamation that the Project would contribute to existing adverse effects on nighttime views and concludes these impacts would be significant and unavoidable. DEIR at 9-54, 9-55. Yet, as California courts make clear, a conclusion of significant and unavoidable does not relieve an agency from its duty to analyze the impacts. "An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences . . . ." *Galante Vineyards v. Monterey Peninsula Water Management District* (1997) 60 Cal.App.4th 1109, 1123 (quoting *Santiago*, 118 Cal.App.3d at 831); *see also Mira Monte Homeowners Assn. v. County of Ventura* (1985) 165 Cal.App.3d 357, 365 (An EIR is meant to protect "the right of the public to be informed in such a way that it can intelligently weigh the environmental consequences of a[] contemplated action."). Here, the public and decision-makers have the right to know what the night sky would look like if the Project and other developments are fully implemented. The EIR's failure to provide this information violates CEQA. PF29-18

(e) The EIR Fails to Adequately Mitigate the Project's Night Sky Impacts.

As discussed above, despite the DEIR's conclusion to the contrary, the Project would result in a significant increase in light and a corresponding impact on the area's night skies. In addition, the DEIR does acknowledge that the Project would result in a cumulatively significant impact on nighttime views (at least in certain locations). DEIR at 9-53, 54. Unfortunately, as we explained in our prior letter, the EIR does not identify sufficient mitigation. FEIR at 3.5-384-387 (SMW letter). Consequently, we identified several mitigation measures that should be implemented to preserve the dark skies of the Project area. Specifically, we suggested that the applicant commit to: (a) placing a cap on the amount of lighting; (b) prohibiting exterior lighting that is not shielded; (c) requiring the use of yellow light sources; and (d) adopting a lighting plan that would curtail the degradation of the nighttime visual environment. As regards the lighting plan, we even attached a sample plan that includes measures that address a PF29-19

project's light impacts while preserving safety, security and the nighttime use and enjoyment of the property. *See* FEIR at 3.5-386–387 (SMW letter, comments I041-26-27).

The FEIR responds by stating that the Project already includes lighting development "standards" and asserts that we did not indicate why the DEIR's measures would not be adequate. FEIR at 3.5-439 (response to comment I041-27). The FEIR is incorrect. We provided ample evidence as to why the measures included in the DEIR would be insufficient. For example, we explained that although the Project's lighting "standards" suggest that exterior lighting would be shielded, a review of the Design Standards in Appendix B indicates only that the shielding of outdoor lighting fixtures "should be considered." *See* FEIR at 3.5-386 (SMW letter, comment I041-26); DEIR at 9-46 and Appendix B, page 19. In fact, the Specific Plan's design "standards" do not actually require that the applicant take any action at all; instead the Specific Plan suggests that "*considerations for lighting should be considered and implemented.*" Specific Plan, Appendix B at B19 (emphasis added). A measure calling for the applicant to take into consideration a particular action provides no assurance that the measure would be implemented. PF29-19 cont.

For the reasons set forth above, the EIR's failure to properly assess the Project-specific and cumulative impacts to visual resources, and to identify enforceable mitigation for them, is fatal. A revised EIR should be prepared that includes a comprehensive evaluation of impacts and this analysis must be supported with substantial evidence as required by CEQA. The revised EIR must also include additional mitigation measures to ensure that the scenic beauty and night skies of this stunning mountain environment are protected.

C. The FEIR's Analysis of, and Mitigation for, the Project's Transportation Impacts Are Inadequate.

We engaged MRO Engineers, a transportation engineering firm, to analyze the DEIR and prepare comments on its transportation analysis. Along with MRO, we submitted extensive comments on the DEIR's analysis of transportation impacts. Rather than provide reasoned responses to these comments, the FEIR simply defends the DEIR's flawed analysis. Notably, the FEIR fails entirely to respond to the detailed comments prepared by MRO Engineers, despite the fact that their December 2, 2015 report was provided to the County, was incorporated by reference into our letter, and was repeatedly PF29-20

cited in our letter.[6] MRO Engineers has prepared a supplemental report documenting the deficiencies in the FEIR. This report, dated June 1, 2016, is attached hereto and incorporated by reference into this letter. *See* Exhibit 3. PF29-20 cont.

Set forth below are some of the more egregious remaining shortcoming in the EIR's transportation and circulation analysis.

1. The FEIR Fails to Correct the Deficiencies in the DEIR's Analysis of Transportation Impacts Because it Errs in its Calculation of the Project's Trip Generation. PF29-21

Our prior letter, along with the December 2, 2015 MRO Engineers' Report, identified several errors in the DEIR's estimate of the Project's trip generation. We explained that the DEIR's flawed methodology resulted in an understatement of the Project's effect on local and regional traffic conditions. *See* FEIR beginning at 3.5-388; *see also* MRO Report, December 2, 2015.

(a) The FEIR's Estimate of the Project's Trip Generation Remains Inaccurate Because it Assumes an Arbitrary Internal Trip Percentage.

We explained that the DEIR substantially underestimated impacts on area roads and intersections because it substantially overestimated the number of trips that would stay internal to the Project. Specifically, the DEIR assumed that 80% of all commercial trips would never leave the Project site. As the MRO December 2, 2015 report explained, no documentation or evidence is provided in support of the internal/external trip percentages. Instead, the number of internal versus external trips appeared to have been fabricated from thin air. FEIR at 3.5-389 (SMW letter, comment I041-34); MRO Report, December 2, 2015 at 3,4; *see also* MRO Report, June 1, 2016, at 4. PF29-22

[6] Although it appears that our December 2, 2015 letter may have inadvertently attached an incorrect version of the MRO report, we promptly responded to a request from County staff for a corrected version. Therefore, the County had the opportunity to respond to the MRO report. We also request that the corrected version be included in the FEIR. For convenience, we attach the December 2, 2015 MRO Report hereto as Exhibit 2.

MRO's analysis demonstrates the significant problem with the EIR's approach. It shows that the commercial-based internal trips exceed the *total* number of trips generated by the full-time residential units. MRO Report, December 2, 2015, at 3-14 and MRO Report, June 1, 2016, at 4-14. Having the number of internal trips associated with the commercial land use far exceed the number of internal trips associated with the residential land use is illogical and incorrect. These numbers must match, as they are essentially the same trip, i.e., a trip origin at a residence with a destination at a commercial site, or vice versa. *Id.* As MRO explains, a balancing process must be undertaken to ensure that these numbers match. That process was apparently ignored in the DEIR analysis. In short, the EIR grossly overestimates the number of internal trips generated by the commercial space. Consequently, the number of external trips has been substantially underestimated.

MRO conducted an analysis using the aforementioned balancing process. The results of the new analysis are as follows: PF29-22 cont.

- Weekday Daily Conditions – The DEIR underestimated external project travel by 2,602 trips (i.e., 65 percent)[7],
- Weekday PM Peak-Hour Conditions – The DEIR underestimated external project travel by 223 trips (i.e., 68 percent),
- Sunday Daily Conditions – The DEIR underestimated external project travel by 590 trips (i.e., 20 percent), and
- Sunday Peak-Hour Conditions – The DEIR underestimated external project travel by 414 trips (i.e., 22 percent).

MRO Report, June 1, 2016, at 11.

The FEIR responds by stating that the assumption that 80% of the Project's commercial trips would never leave the site was based on the DEIR's project description. FEIR at 3.5-441, 442 (response to comment I041-34). Yet the DEIR's Project Description failed to provide sufficient support for this assumption. It simply states that

[7] The DEIR identified 3,985 weekday daily external trips while the corrected weekday external trip generation is 6,587. *See* MRO June 1, 2016 report at 5 and 9.

the Project's commercial uses, stores, and restaurants would be designed to support Project residents. DEIR at 3-16.

Moreover, as the MRO report explains, it is unreasonable to assume that only residents of the Project would patronize the retail facilities. MRO Report, June 1, 2016, at 3. Indeed, since the Project places no restrictions on outside visitors shopping at the Project's stores or dining at the Project's restaurants, the EIR cannot simply ignore the potential for these visitors to drive to these retail uses. PF29-22 cont.

(b) The FEIR's Estimate of the Project's Retail and Commercial Trip Generation Remain Inaccurate.

The DEIR also substantially underestimated the amount of traffic that would be generated by the Project because it assumed that all the commercial/retail uses would be developed in a single location. The December 2, 2015 MRO report explained that this approach to determining the Project's trip generation was incorrect because the DEIR and Staff Report clearly state that the Project's commercial uses could be distributed throughout the site. *See* MRO Report December 2, 2015, at 2; DEIR at 3-17; June 2, 2016 Staff Report at 7; and MRO Report June 1, 2016, at 1. MRO explains that the actual distribution and configuration of the commercial/retail space makes a substantial difference in terms of how much traffic is generated by that land use. MRO Report June 1, 2016, at 2. If the retail/commercial use is provided in three equal-sized components, the daily trip generation would be 47 percent higher than if all of the space is in a single location. In the PM peak hour, a 44 percent increase in trips would result from splitting the commercial land uses up in this way. *Id.* PF29-23

The FEIR offers a couple of excuses as to why its approach to trip generation is acceptable. Each of these is unavailing. First, the FEIR asserts that it is unknown at this time where, and in what configuration, the commercial uses would be developed. FEIR at 3.5-441 (response to comment I041-33). Yet, the DEIR clearly shows two sites that are designated for neighborhood commercial use. *See* DEIR Exhibit 3-7 at 3-15. Second, the FEIR suggests its approach is reasonable because the Project's commercial/retail would be designed to serve a self-contained population. FEIR at 3.5-440, 41 (response to comment I041-33). As discussed above, the EIR cannot rely on this unreasonable assumption for purposes of calculating the Project's trip generation. Since distributed retail/commercial is specifically contemplated by the applicant, the DEIR is obligated to identify the trip generation, and analyze the traffic impacts, from this land use configuration.

(c) The FEIR's Estimate of the Project's Trip Generation Remains Inaccurate Because it Relies on "Typical" Conditions that Do Not Reflect the Area's Unique Winter Conditions.

We commented that the trip rates used for winter conditions, which were derived from the Institute of Transportation Engineers ("ITE") Trip Generation Manual, should not have been used because they do not reflect the abundant winter recreational activities along SR 267 that attract sufficient visitors to result in a significant increase in travel demand during the winter season. FEIR at 3.5-388 (SMW letter, comment I041-31-32); MRO Report, December 2, 2015, at 14. MRO explained that the ITE Manual represents "typical" conditions and does not reflect the increased level of traffic demand associated with these unique winter conditions. PF29-24

The FEIR does not directly respond to this comment. Rather, it: (1) identifies that the Sunday winter peak occurs between 3:45 and 4:45 pm; and (2) reiterates the trip generation rate used in the DEIR, suggesting that the ITE category of "Recreational Homes" is for second homes and those rented on a seasonal basis. FEIR at 3.5-440 (response to comment I041-32). The FEIR further asserts that the residents of the Project would have the choice not to travel on this road during the winter peak hour. *Id.* Consequently, the FEIR fails to resolve this deficiency because it contains no information regarding the atypical volumes of winter traffic in the area due to winter recreational activities.

2. The FEIR Fails to Acknowledge that the Project Would Significantly Impact the Intersection of SR 267 and the Project Access Roadway.

As noted above, the DEIR substantially underestimated the volume of Project-generated traffic, primarily due to incorrect adjustments to reflect internal travel at the Project, as well as an unrealistic approach to estimating the trip generation for the proposed commercial/retail land uses. To provide an example of the effects of these technical deficiencies, MRO performed an analysis of the intersection of the SR 267/Project Access Roadway, incorporating corrected project trip generation values for the summer Friday PM peak hour. *See* MRO Report, June 1, 2016, at 15. As MRO explains, once the Project's trip generation estimate is corrected, the number of external trips would increase, which would increase the Project-generated demand on the critical outbound left-turn movement and the other conflicting movements at the SR 267/Project Access Roadway intersection. The end result is that the SR 267/Project Access Roadway intersection would operate at an unacceptable LOS E. This is a significant impact, which PF29-25

was not revealed in the DEIR. Consequently, no mitigation measure was identified to remedy the Project-related operational deficiency. This is a substantial flaw in the DEIR, requiring that the EIR be revised and recirculated. PF29-25 cont.

3. The FEIR Fails to Adequately Analyze Tahoe Regional Transportation Impacts, Including Impacts to the I-80 Freeway and its Ramps.

We commented that the DEIR did not analyze impacts on I-80 or its ramps. FEIR at 3.5-393 (SMW letter, comments I041-43-44); MRO Report, December 2, 2016 at 16, 17. As an initial matter, MRO explained that the DEIR substantially underestimated the percentage of the Project's traffic that would use I-80 to/from the west, i.e., to/from Sacramento and the San Francisco Bay Area. *See* MRO Report December 2, 2015, at 16. MRO compared the assumed geographic distribution of the proposed Project's trips to those assumed for the Village at Squaw Valley Specific Plan ("VSVSP") Project. While the VSVSP Project DEIR determined that 51 percent of overnight guests would travel to/from Sacramento and the San Francisco Bay Area, the MVW DEIR assumed that just 23 percent would travel to/from these locations. *Id.* Although the two projects are not identical, they are sufficiently similar that the project trip distribution parameters should not vary substantially, and certainly not by the amount the EIR suggests. The FEIR failed to respond to MRO's comment. PF29-26

Despite the significant role that I-80 will play in accommodating Project traffic, the DEIR provided *no* analysis of the impacts on the I-80 mainline. The FEIR now provides a cursory analysis of the I-80 mainline and asserts that I-80 likely already operates at unacceptable levels and under cumulative conditions would also operate at unacceptable levels. FEIR at 3.5-444, 445 (response to comment I041-43). The FEIR concludes that because the Project would not cause a 0.05 volume to capacity ("V/C") ratio increase, the Project's impacts on I-80 would be less than significant. *Id.* However, this conclusion is faulty. As the June 1, 2016 MRO report explains, Caltrans provides a different significance criterion for facilities that operate at unacceptable levels of service under "no project" conditions. Specifically, Caltrans states that if an existing State highway facility is operating at less than the appropriate target level of service ("LOS"), the existing Measure of Effectiveness ("MOE") should be maintained. MRO June 1, 2016 report at 17, 18. In this case, the MOE is the V/C ratio and, according to the FEIR, the addition of the Project traffic would cause the MOE to increase, i.e., become worse by 0.01 in both peak hour periods, both east and west of SR 267. FEIR at 444, 445 (response to comment I041-43). Since the MOE would not be maintained, a significant

impact would occur on the I-80 mainline. The EIR must be revised and recirculated to discuss this new impact, and evaluate potentially feasible measures to reduce the impact. Moreover, the revised EIR's analysis of impacts to I-80 must take into account accurate trip generation estimates.

Our prior letter, and the MRO December 2, 2015 report, also pointed out that no analysis had been conducted with respect to the I-80 on- and off-ramps at SR 267. FEIR at 3.5-393 (SMW letter, comment I041-44). The FEIR responds by stating that the calculation for the freeway segment LOS for merge and diverge segments included an analysis of traffic volumes versus capacities for both freeway ramp areas and the ramps themselves. FEIR at 3.5-445 (response to comment I041-44).

As MRO explains, this is simply incorrect. Nothing in the analysis of the ramp merge and diverge areas tells us anything about whether the ramps themselves have sufficient capacity to accommodate the Project's traffic demand. MRO Report, June 1, 2016, at 18. It is essential that the EIR include an analysis of the impacts to these ramps from the Project and under cumulative conditions. PF29-26 cont.

The EIR also fails to adequately analyze other regional traffic impacts occurring within the Tahoe Basin. The Tahoe Basin is an area of "statewide, regional, or areawide significance" under CEQA. CEQA Guidelines § 15206(b)(4)(A)). The Basin has an environmental carrying capacity (*i.e.*, a point at which Lake Tahoe and the Basin no longer sustain the environmental attributes that make it an area of statewide and regional significance), which is reflected in thresholds set by the Tahoe Regional Planning Agency ("TRPA"). For projects that impact the Basin, the lead agency must "consult with transportation planning agencies and public agencies [in the Basin] that have transportation facilities within their jurisdictions that could be affected by the project." CEQA Guidelines § 21092.4(a).

Consequently, the EIR must take into account the Basin's environmental carrying capacity. For example, while the DEIR admitted that the Project would cause significant and unavoidable traffic impacts along SR 267 (DEIR at 2-38- 2-43), the DEIR failed to provide an overall estimate of the additional vehicle miles travelled (VMT) in the Basin that would result from the Project. *See* MRO June 1, 2016 report at 27. This is important because TRPA's environmental carrying capacity calls for a VMT threshold of 10 percent below 1981 levels (or 2,067,600). FEIR at 3-17. The FEIR attempts to provide the VMT estimate, calculating that the Project would generate 13,745 on a peak

travel day. *Id.* This estimate was based on an assumption that 35% of the Project's trips would travel to the Basin.[8] *Id.*

The FEIR claims that even with Project-generated VMT, the VMT in the Basin would be less than the threshold (equaling a total of 1,998,345). *Id.* However, the FEIR fails to identify or analyze the Project's *cumulative* impacts to VMT in the Basin, when viewed in conjunction with the many other projects currently planned for the area (such as the Village at Squaw Valley Specific Plan and the Brockway Campground Project) – or the potential for town-centered development *within* the Basin, as called for in the TRPA Regional Plan Update. Moreover, it is important to reiterate that the project's VMT estimate is inaccurate because of the significant deficiencies in the trip generation estimates described above and in the MRO June 1, 2016 report, particularly with respect to internal trips at the proposed Project. Given that there is only a remaining 69,255 VMT before the threshold is met, this is a critical issue. Moreover, using up almost 20% of the Basin's remaining VMT capacity for one project certainly constitutes a significant adverse impact. PF29-26 cont.

Equally important, the FEIR briefly acknowledges the Project, which would generate an estimated 1,394 daily trips to the Basin, would far exceed TRPA's 200 daily trip threshold. FEIR at 3-17; FEIR at 3.3-2 (TRPA comment letter). However, the FEIR cursorily concludes that it need not utilize TRPA's thresholds or required mitigation because the Project site is located outside the Basin. FEIR at 3-17. As discussed, although the Project may be located outside of the Basin, the traffic the Project would generate would not stay in one place; that traffic would also be located inside the Basin. Thus, the FEIR's response does not pass muster.

In sum, the Project's substantial VMT and daily trip generation result in a significant impact to the unique environment of the Basin that must be analyzed and mitigated, regardless of jurisdictional boundaries. Viewed in a different way, if new projects just outside of the Basin were allowed to ignore TRPA thresholds, they could easily cumulatively result in an exceedance of the environmental carrying capacity of the Basin without ever identifying this as a significant impact or requiring mitigation. This

[8] We believe this is an underestimation as studies show that a much larger portion of visitors to the project area would also visit attractions in the Basin. *See, e.g.*, FEIR at 3.5-90 (Friends of West Shore and Sierra Club letter).

would not only degrade the environment of a treasured resource,[9] it would also preclude any new development or much needed redevelopment within the Basin itself. PF29-26 cont.

4. The FEIR Fails to Adequately Analyze the Project's Potential to Increase Hazards.

The DEIR failed to evaluate the Project's potential to increase hazards. *See* FEIR at 3.5-396 (SMW letter, comment I041-50); MRO Report, December 2, 2015, at 18; *see also* MRO Report, June 1, 2016, at 20. Rather than provide a thorough analysis of all Project-related hazards, the DEIR focused its analysis exclusively on chain controls on SR 267. *Id.* We explained that this myopic approach to impact analysis ignored other hazards, such as the potential risk to public safety that would occur for motorists trying to turn onto SR 267 (which has speeds between 55 and 60 mph) from the unsignalized Project Access Roadway. *Id.* This potential public safety risk warrants critical analysis because according to Caltrans, the introduction of a stop-sign-controlled intersection on a high-speed roadway such as SR 267 is, practically by definition, a significant hazard. The Caltrans Highway Design Manual (p. 400-3) specifically states: PF29-27

> Intersections have a higher potential for conflict compared to other sections of the highway because travel is interrupted, traffic streams cross, and many types of turning movements occur.

See MRO Report, June 1, 2016, at 20.

Rather than actually analyze this impact, the FEIR simply asserts that the SR 267/Project Access Roadway intersection would be designed so as not to create a new hazard. FEIR at 3.5-449 (response to comment I041-50). The FEIR states that the intersection would have separate left- and right-turn lanes for exiting traffic, as well as acceleration lanes on SR 267 in both the northbound and southbound directions. *Id.*

---

[9] Increased VMT and vehicle trips not only affect traffic and air quality, they also impact the water quality/clarity of the Lake as fine sediments generated by roadway traffic accounts for a significant portion of the sediments in the Lake. *See* Fugitive Dust Emissions from Paved Road Travel in the Lake Tahoe Basin, available at: http://www.2ndnaturellc.com/wp-content/uploads/2013/07/Fugitive-Dust-Emissions-from-Paved-Road-Travel-in-the-Lake-Tahoe-Basin1.pdf; accessed June 7, 2016, attached hereto as Exhibit 4.

Skeptical that this intersection could be designed in a manner that would avoid the potential for vehicular accidents, MRO conducted an independent evaluation of the new intersection design and the proposed acceleration lanes. *See* MRO Report, June 1, 2016, at 19-22. MRO determined that the Project access intersection is grossly under-designed and would create the potential for high speed side-swipe collisions between vehicles exiting the Project site and through vehicles on SR 267. *Id.*

It is also important to note that terrain in the Project vicinity makes driving even more hazardous. The proposed access road would be on a steep incline. Steep roads can be particularly treacherous during snowy and icy conditions. Indeed, Highlands View Drive, located just to the north of the Project site, closes during inclement weather in the winter due to hazardous driving conditions, and its incline is less steep than the Project's proposed access road. The EIR does not even acknowledge the hazardous nature of the access road, nor does it explain how access would be maintained during winter conditions. The Project clearly would result in a substantial increase in hazards due to design features, yet this is not acknowledged in either the DEIR or the FEIR. Consequently, the EIR must be revised to analyze this impact and feasible mitigation, and then recirculated. PF29-27 cont.

5. The FEIR Fails to Analyze the Project's Potential to Result in Inadequate Emergency Access.

According to federal officials, stubborn drought conditions and an epidemic of dead and dying trees mean California is facing a potentially catastrophic fire season. *See* "Spike in dead trees adds to fire danger," San Francisco Chronicle, May 18, 2016, attached as Exhibit 5. The Project site is particularly at risk since the site and surrounding lands are designated as being within high and very high fire hazard severity zones. DEIR at 18-2 . PF29-28

We commented that the DEIR lacked the evidence to conclude that the Project would not interfere with emergency access to the Project site. FEIR at 3.5-410 (SMW letter, comment numbers I041-67—70); MRO Report, December 2, 2015, at 18, 19. We explained that SR 267 is the only roadway by which emergency vehicles could access the Project site and this roadway would operate at LOS E as a result of the Project and LOS F under cumulative conditions. *See* Specific Plan at 2-9 (disclosing that all evacuation routes lead to SR 267); DEIR at 2-38—2-45; MRO Report December 2, 2015, at 18, 19.

Notwithstanding this extreme traffic congestion on SR 267, the DEIR omitted entirely an analysis of the Project's impact on emergency access and response times. Indeed, under the heading "Issues Dismissed from Further Consideration," the DEIR did nothing more than acknowledge the locations of two emergency vehicle access roads. DEIR at 10-27.

In response to our comment, the FEIR asserts that this impact is analyzed in two locations: under Impact 17-3 (Increased demand for fire protection and emergency medical services) and in the Emergency Plan and Emergency Evacuation Master Response. The FEIR continues to suggest that impacts relating to emergency access and response times would be less than significant. *See* DEIR at 17-16; FEIR at 3-37.

A review of Impact 17-3 reveals that it does not include the required evaluation of the Project's impact on emergency access and response times. Rather, the DEIR simply states that consultation with the Northstar Fire Department ("NFD") would be required during project design to ensure that access for emergency vehicles is adequate. DEIR at 17-17. The mere act of consulting with NFD would do nothing to ensure adequate emergency access, as it does not require the applicant or NFD to take any action. In addition, it is hard to envision any action that NFD could take to ensure adequate emergency vehicle access to the Project site given the expected gridlock along SR 267. Therefore, the EIR cannot rely on the discussion in Impact 17-3 to conclude that impacts relating to emergency access and emergency response times would be less than significant. PF29-28 cont.

The FEIR's Master Response fares no better since all of the information relating to emergency access and response time is explicitly deferred. Specifically, the FEIR looks to a yet-to-be prepared Fire Protection Plan ("FPP") that would eventually identify emergency access road standards. FEIR at 3-37. It is wholly inappropriate to rely on this FPP to conclude that the Project would not impact emergency access and response times and allow it to be delayed until after Project approval. CEQA allows a lead agency to defer mitigation only when: (1) an EIR contains criteria, or performance standards, to govern future actions implementing the mitigation; (2) practical considerations preclude development of the measures at the time of initial project approval; and (3) the agency has assurances that the future mitigation will be both "feasible and efficacious." *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 94-95 ("*CBE*"); *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 669-71; Guidelines § 15126.4(a)(1)(B). Here, the EIR has met none of these requirements.

The FEIR further explains that the Specific Plan includes an Emergency Preparedness and Evacuation ("EPEP") and that this plan purportedly addresses the potential risks from environmental hazards and evacuation scenarios. *See* FEIR at 3-38. Yet, a review of the EPEP indicates that it also does not include the necessary impact analysis nor any performance standards for emergency response times.

The FEIR does, however, finally include an analysis of traffic conditions during an evacuation scenario, and its conclusions are alarming. In the event of a wildfire occurring during the peak of the summer tourist season, it would take about 1.3 hours for all vehicles to exit the Project site under the existing plus Project conditions and 1.5 hours under cumulative plus Project conditions. FEIR at 3-39. As alarming as these lengthy evacuation times are, they do not reveal what these motorists would do once they encounter gridlock on SR 267. Nor does this evacuation scenario provide any indication as to how long it would take emergency vehicles to access the scene of the wildfire, e.g., in the wildlands behind the Project site. PF29-28 cont.

The EIR's failure to include even a superficial evaluation of the effects of the Project-induced traffic congestion on emergency access and vehicle response times is a fatal flaw. Moreover, the EIR lacks any basis to conclude that the Project's potential to interfere with emergency access and response times would be less than significant. The EIR must be revised to include a comprehensive analysis of, and mitigation for, this critical public safety impact. The revised EIR must then be recirculated for public review and comment.

6. The FEIR Fails to Adequately Analyze or Mitigate the Project's Cumulative Transportation Impacts.

We commented that the DEIR failed to adequately analyze the Project's cumulative traffic impacts. *See* FEIR at 3.5-397 (SMW letter, comment I041-52); MRO Report, December 2, 2016, at 17, 18. One notable deficiency in the cumulative traffic analysis relates to the fact that although the DEIR purports to evaluate traffic operations in the year 2034, in reality the future traffic volumes are based on the year 2025. *Id.* As MRO explains, "in effect, zero traffic growth was assumed for nine of the nineteen years included in the cumulative conditions analysis (i.e., from 2025 through 2034)." *Id.* The FEIR does not respond to this comment. PF29-29

7. The FEIR Fails to Adequately Mitigate the Project's Significant Transportation Impacts.

(a) The EIR Lacks the Evidentiary Support that Its Measures Would Effectively Mitigate the Project's Impacts.

We commented that the DEIR failed to identify feasible mitigation measures for the Project's significant impacts to intersection and roadway segment operations. FEIR at 3.5-391-392 (SMW letter, comment I041-39); MRO Report December 2, 2015, at 19-21. The MRO Report, for example, described the flaws in the few mitigation measures that were identified in the DEIR. MRO explained that Mitigation Measure 10-1a and Mitigation Measure 10-1b, for example, which call for optimizing signal timing at two locations, would likely have little or no effect in improving traffic operations. *Id.* MRO also explained that the DEIR failed to provide any evidentiary support for the conclusion that Mitigation Measure 10-1c, which calls for the provision of signage on Highlands View Road, would mitigate the Project's traffic impacts at SR 267 and Highlands View Road to a less than significant level. *Id.* The FEIR fails to provide any response to these comments. PF29-30

We also faulted the mitigation measures identified for the Project's significant impacts on public transit service. FEIR at 3.5-395 (SMW letter, comment I041-48, 49); MRO Report, December 2, 2015, at 20. Specifically, we explained that the DEIR did not provide any indication as to how the establishment of a Zone of Benefit ("ZOB") or annexation into a pre-existing ZOB, or joining and maintaining membership in the Truckee-North Tahoe Transportation Management Association ("TNT/TMA") would effectively reduce the Project's significant transit impacts, especially when the DEIR failed to disclose the amount of money the applicant would be required contribute to these entities. *Id.* MRO echoed this concern:

> Beyond the lack of any meaningful analysis of project-related transit demand or the faulty evaluation of the transit system "enhancements" proposed by the project, however, is the fact that the proposed mitigation measures will have absolutely no effect with respect to remedying the transit capacity deficiency identified in the DEIR. Only one form of mitigation will be truly effective in this regard: Provide additional transit service, which requires additional and/or larger transit vehicles running more frequently. Neither payment of an annual fee nor joining a transportation management organization will have any effect in this regard.

MRO Report, December 2, 2016, at 21.

Furthermore, in response to our comment that the DEIR failed to analyze the effect that the Project would have on public transit, the FEIR includes a new analysis and determines that the Project's impact on public transit would actually be less than significant. FEIR at 3.5-446 (response to comment I041-46). Consequently, the EIR authors may ultimately suggest that the mitigation measures calling for the establishment of a ZOB or joining the TNT/TMA are no longer necessary.

Regardless of the DEIR's determination that the Project's impact on public transit would be less than significant (which we do not agree with), the Project's impact on local roads and intersections remain significant and largely unmitigated. Therefore, the County cannot simply abdicate its responsibility under CEQA to consider and approve specific measures that would reduce these traffic impacts. Pub. Res. Code §§ 21002.1(a), 21061. As discussed below, to effectively reduce the Project's traffic impacts, the EIR must evaluate feasible alternatives and/or measures that would minimize the Project's vehicular trips. In addition to an alternative that would reduce the number of units, one of the most logical and effective trip reduction measures is to substantially expand public transit service. PF29-30 cont.

(b) The EIR Inappropriately Rejects Feasible Mitigation Measures.

If the EIR had identified adequate mitigation measures as required under CEQA, many of the Project's significant traffic impacts could have been avoided, or at least substantially lessened. We suggested several measures intended to reduce the number of trips generated by the Project such as subsidies for transit use; providing covered bicycle parking near the Project's retail establishments; the provision of shuttle service to key destinations in the region; and a requirement that the applicant actively recruit transit riders by distributing transit information to each residence and retail establishment in the development. FEIR at 3.5-392 (SMW letter, comment I041-39). The FEIR mentions that the applicant would implement "a shuttle," yet dismisses the remainder of these measures without adequate analysis or ignores them altogether. FEIR at 3.5-444 (response to comment I041-39).

For example, in regards to our suggestion that the applicant provides a transit fare subsidy or free transit passes for the Project's residents, the FEIR rejects this measure outright. It claims that the Project would not be controlled by a single applicant

following construction and thus no method exists to provide transit passes. *Id.* This excuse is unavailing. Certainly mechanisms exist for the applicant to provide annual transit passes. Indeed, the EIR calls for the establishment of a ZOB, the purpose of which is "to provide adequate funding of capital and ongoing operational transit services/requirements." DEIR at 10-33. We question why the applicant could not provide a cash legacy to the ZOB after the development is complete and designate the ZOB to implement the free transit passes on an on-going basis.

Free transit service is highly effective in attracting riders, even in relatively remote areas such as Martis Valley. Missoula Montana's three-year "zero-fare" demonstration project, for example, greatly increased transit use in the Missoula area. *See* "Free Transit Attracts Riders, Helps Communities in More Ways Than One," Shareable, September 16, 2015, attached as Exhibit 6. Providing free transit passes would be highly effective in encouraging people to take the bus, rather than their cars, to certain destinations. For example, because parking is extremely limited at most of the area's ski resorts, people have an added incentive to travel by bus, especially if the bus service is convenient and free. PF29-30 cont.

The applicant could also provide funding to actively recruit transit riders. *See* FEIR at 3.5-392 (SMW letter, comment I041-39). Many individuals staying at the Project's residential units or frequenting the Project's stores and restaurants may not be aware of existing bus lines serving the area. By distributing transit information to each residence as well as the stores and restaurants in the Project, visitors would be apprised of opportunities to travel by bus to certain locations. Operation of a transit assistance center, offering on site, one-stop shopping for transit opportunities, preferably staffed with a live person to assist visitors could be quite effective in reducing travel by automobile.

In response to our suggestion that the applicant provide programs to encourage travel by bicycle, the FEIR asserts that measures that promote travel by bicycle could affect internal trips but would not mitigate offsite external Project impacts. FEIR at 3.5-444 (response to comment I041-39). We disagree. The applicant could provide bicycles during the non-snowy seasons for travel in and around the Project site similar to Portland's free community bike program. The Project site is less than 10 miles from Lake Tahoe and Kings Beach. It is also close to Northstar, which offers an array of summer activities such as live music, golf, miniature golf, skate rental, and a rock wall. Certainly some visitors might gladly make these trips by bicycle rather than car.

Finally, as discussed above, perhaps the most effective way to reduce the Project's traffic impacts is to *significantly* expand transit service. In addition to contributing (an unspecified amount of) money to the ZOB and the TNT/TMA, the applicant should make a sizable financial donation to the local transit agency specifically earmarked for the expansion of transit service, i.e., larger transit vehicles running more frequently. The applicant could also commit to engage in a partnership with nearby ski resorts such as Northstar to collaborate on transit service that is intended to link residents to services, tourists to local attractions, and workers to employment.

The only measure the FEIR does agree to include—the implementation of a shuttle—is too vague to allow for a determination of its effectiveness. FEIR at 3.5-444 (response to comment I041-39). Indeed, we can find no information in the EIR about this shuttle other than the fact that it would travel to local destinations. *Id.* What locations would be served by this shuttle? How many shuttles would be in operation? What size shuttle(s) would be used? How often would the shuttle(s) run? What hours would they run? Moreover, the FEIR states that the shuttle would not be implemented until the 340th unit is constructed. Because the Project's traffic would begin to inundate roads and intersections as soon as the first phase of residential development is occupied, we can find no plausible reason why this shuttle service should not also commence immediately following occupancy of phase 1. PF29-30 cont.

Additionally, as explained further below (*see infra* Section III.B), we suggested an alternative that would avoid significant traffic impacts by reducing the number of units, conserving the Tahoe Basin portion of the West Parcel, and utilizing an alternate access road for the Project. As discussed below, the FEIR dismisses each of these suggestions out of hand.

In sum, the FEIR does nothing to revise the mitigation measures included in the DEIR and our comments therefore remain valid. In addition, although we submitted seemingly reasonable, and certainly feasible, suggestions for mitigation, the EIR's refusal to consider them is disingenuous and a clear violation of CEQA.

D. The FEIR Adds New Information Regarding Greenhouse Gas Emissions that Requires Recirculation, But Fails to Correct All the Deficiencies in the DEIR.

1. The FEIR's New Analysis of GHG Emissions Must Be Recirculated.

The FEIR correctly notes that, as our comment letter on the DEIR informed the County, the California Supreme Court has recently issued a decision that calls for an alteration in the DEIR's analysis of greenhouse gas ("GHG") emissions. *See* FEIR at 3-20–3-23 (discussing *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 224 Cal.App.4th 1105 ("*CBD v. CDFW*")); FEIR at 3.5-399–3.5-402 (SMW letter). *CBD* holds that an agency reviewing a development project may not rely on a standard statewide reduction from the business-as-usual ("BAU", also referred to as no action taken or "NAT" in the DEIR) GHG emission scenario to claim less-than-significant project-related GHG emissions, unless it can provide substantial evidence of a link between the statewide reduction below BAU and the needed reductions for the project. *Id.* The FEIR also correctly notes that the DEIR failed to provide the required substantial evidence of such a link, and that local air quality agencies no longer recommend relying on the BAU standard. FEIR at 3-22, 3-29. As our comments on the DEIR noted, the *CBD* decision thus invalidates much of the approach utilized in the DEIR for evaluating GHG emissions. PF29-31

We commend the County for recognizing the *CBD* decision and removing the BAU standard as a threshold of significance from the EIR. *See* FEIR at 3-29. Unfortunately, the FEIR fails to recognize the import of this change. Rather, it incorrectly claims that "[t]he DEIR's significance conclusions remain unchanged, including the way it used the PCAPD Tier II threshold of 21.7 percent below BAU." FEIR at 3-22. This statement entirely ignores the analysis in the DEIR, as well as the alterations the FEIR makes to this analysis. The DEIR used the 21.7 percent below BAU as a threshold for 2020, and found that operational GHG impacts at that time would be less than significant. DEIR at 12-9, 12-13–12-15. The FEIR deletes the operative language, and instead finds a significant GHG impact for 2020. *See, e.g.*, FEIR at 3-30 (deleting operational GHGs "would not exceed the GHG efficiency based Tier II threshold recommended by PCAPCD for 2020"), 2-22 (same), 3-31 (adding "which is a significant impact"), 3-34 (deleting "the built out MVWPSP would achieve a reduction in greenhouse gas emissions of 23.2 percent by 2020"). As the FEIR notes, recirculation is required when the FEIR reveals a significant impact that was not discussed in the DEIR. FEIR at 3-2. This is precisely what happened here.

The FEIR provides two main excuses for why the "Draft EIR's significance conclusions remain unchanged" (FEIR at 3-22), both of which must fail. First, the FEIR claims that, even though the conclusions regarding impacts in 2020 have changed, the DEIR's overall conclusion that the project would have significant and unavoidable operational impacts at full-build out remains unchanged. FEIR at 3-22. This is irrelevant. Clearly, as revealed by the changes referenced above, the DEIR found operational GHG impacts in 2020 to be less than significant and the FEIR finds these impacts "significant." As discussed, that is a change requiring recirculation. Further, even if the EIR lumps all operational GHG impacts into one impact category, CEQA requires recirculation where there has been a substantial increase in the *severity* of an impact. CEQA Guidelines § 15088.5(a)(2); FEIR at 3-2 (quoting same). Here, even if the overall conclusion of significance remains unchanged, because the DEIR claimed that operational impacts in 2020 would be less than significant, the FEIR's revelation that those impacts are indeed significant results in an increase in severity of operational impacts requiring recirculation. PF29-31 cont.

Next, the FEIR claims it is "doubtful that much of the project would be constructed prior to 2020." FEIR at 3-34. Yet, the FEIR admits that the first phase could be completed by 2018 (FEIR at 3-23), and then logically at least the second phase could be completed by 2020 (possibly more with overlapping construction). With potentially two or more phases of the project to be completed by 2020, evaluation of environmental impacts in 2020 is very relevant. The FEIR does not state what the first phases of construction would entail. However, since at full buildout the project would generate roughly 30,000 MT CO_{2e} *per year* (FEIR at 3-31), only about 3% of the project would need to be built by 2020 to exceed the FEIR's established threshold of 1,100 MT CO_{2e}/year. This is entirely plausible and foreseeable. Thus, unless the project includes a condition that construction would not start until after 2020, the County cannot claim that GHG impacts in 2020 (or before that) are irrelevant. It must recirculate the EIR to discuss this new impact.

In sum, in light of recent California Supreme Court precedent, the FEIR correctly alters a threshold of significance for the project. The FEIR accordingly deletes a prior finding that GHG impacts in 2020 would be less than significant to state that those impacts are indeed significant and unavoidable. The County must now recirculate the EIR so that the public may adequately comment upon the project's significant GHG impacts under the FEIR's new threshold of significance, and suggest ways to avoid or mitigate them (see discussion *infra* re GHG mitigation).

2. The FEIR Fails to Adequately Respond to Comments that the DEIR Contains Misleading Information Regarding GHG Emissions.

Sierra Watch and MAP commented that the DEIR included misleading information by claiming the project would not result in significant climate change impacts in 2020 because it reduces GHG emissions by more than 21.7% compared to NAT (or BAU). *See* FEIR at 3.5-400–3.5.402 (SMW letter). As discussed above, the California Supreme Court has validated this comment, stating that an agency cannot claim a single project is doing its part to reduce GHG emissions by meeting a generic statewide standard. This is because, as the FEIR recognizes, new projects are much more capable of achieving reductions than pre-existing uses and therefore will likely be required to implement more reductions. While the FEIR does delete the NAT/BAU standard as a threshold of significance, specifically noting that it is not supported by substantial evidence as applied to this project, it maintains the discussion of this standard "[t]o help characterize the nature of the impact." FEIR at 3-31. PF29-32

Indeed, the FEIR now claims the project would produce a 30% reduction in GHG emissions (instead of 23.2%) and that the Project is therefore "relatively GHG-efficient." *See* FEIR at 3-32–3-33. The EIR provides no explanation as to why a method of analysis involving BAU that is no longer recommended by the local air district and is not supported by substantial evidence could somehow help "characterize the nature of the impact." This is especially true given the nature of the project, which involves construction of vacation residences and commercial space where no development currently exists. While under a "business as usual" scenario the state may need to keep generating homes for people to live in as population grows, there is no similar need to produce luxury vacation residences that induce additional driving and consumption. As the EIR recognizes, this Project would result in 30,000 MT CO_{2e} per year of *new* GHG emissions. Claiming this is somehow "efficient" in terms of the State's climate change goals is misleading. *See Friends of Oroville v. City of Oroville* (2013) 219 Cal.App.4th 832, 844 ("speculative and contradictory conclusions" do not support analysis of GHG impacts). The EIR must be recirculated to remove any references to NAT/BAU or the Project being "efficient" that are not supported by substantial evidence.

3. The FEIR Fails to Adequately Respond to Comments About the Project's Consistency with Applicable Plans. PF29-33

Sierra Watch and MAP commented on the DEIR's failure to analyze whether the project complies with applicable plans and policies for GHG reduction,

including AB 32, SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy ("MTP/SCS"), Executive Order S-3-05, and Executive Order B-30-15. *See* FEIR at 3.5-402–3.5-404. Sierra Watch and MAP even provided a road map for how to conduct such analyses. The FEIR responds with a host of excuses, citing agency discretion and that analysis would require speculation. *See* FEIR at 3.5-452–3.5-455. However, for a long-term project such as this one, some amount of foresight is required, and as our letter pointed out, other agencies have been able to conduct the analysis.

While the EIR does contain some discussion of these plans, its analysis is incomplete at best. For example, while the FEIR provides a generic description of statewide and regional GHG reduction targets, it fails to provide the public with an understanding of how a new major regional source of GHG emissions from a development such as this could throw the State off the steep emissions reductions trajectory needed to help correct course to avoid some of the most catastrophic impacts from climate change. Our letter on the DEIR provided conservative methods to conduct the necessary analyses (such as using 1990 emission levels as a target for 2020, as set forth in AB 32; comparing Project or vehicle emissions to the regional targets set for 2020 and 2035 by the MTP/SCS; and using SANDAG's approach to analyzing consistency with 2050 reduction targets), but the FEIR cursorily dismisses these suggestions. The FEIR is correct that the GHG analysis for SANDAG's RTP/SCS is currently pending before the state Supreme Court. *See* FEIR at 3.5-454. However, the County is on notice that the requested analysis is feasible. Thus, if/when the Supreme Court affirms the Court of Appeal's decision that an analysis of consistency with the state's long-term GHG reduction targets is required for long-term projects, the County will have no defense for its lack of analysis. *See* FEIR at 3-21 (noting that the Supreme Court in *CBD v. DFW* admonished that "especially for long-term projects" an EIR "may in the near future need to consider the project's effects on meeting longer-term emissions reduction targets.").

PF29-33 cont.

4. The FEIR Fails to Adequately Respond to Comments About the DEIR's Underestimation of GHG Emissions.

PF29-34

As explained in our prior comments and in the December 2, 2015 and June 1, 2016 MRO reports, the DEIR's GHG analysis relied on inaccurate trip generation figures to calculate GHG emissions from vehicle travel, thereby underestimating the Project's impacts on climate change. *See* FEIR at 3.5-404–3.5-405 (SMW letter, comment I041-61–I041-62). As explained above and in the June 1, 2016 MRO report, the FEIR fails to correct the errors in the trip generation figures and therefore continues

to understate the Project's GHG impacts. *See* supra Section II.C(1); MRO Report, June 1, 2016, at 27.

The FEIR's bald claim that the document actually *overestimates* the Project's trip generation is unsupported by the record. FEIR at 3.5-455–3.5-456 (response to comment I041-62). It bases this claim on the fact that trips generated by the Project are likely already assumed by the Regional Transportation Plans and Sustainable Communities Strategies for the Bay Area and Sacramento regions, and therefore the EIR is likely double counting these trips. *Id.* But the EIR presents no evidence that these regional plans contemplated the proposed Project, nor does it attempt to incorporate any analysis from the EIRs for those plans. PF29-34 cont.

5. The EIR's Mitigation of Significant GHG Impacts Remains Inadequate.

Sierra Watch and MAP commend the County for acting upon the groups' comments that mitigation is needed for GHG significant impacts in the early phases of development, and accordingly removing the condition that mitigation only be imposed "after December 31, 2020." FEIR at 3-33. However, the EIR's mitigation for GHG impacts remains woefully deficient for several reasons.

First, now that the FEIR has employed a different threshold of significance for GHGs, the mitigation provided is completely divorced from the impact identified. The FEIR states that significant GHG impacts result where the project results in annual emissions greater than 1,100 MT CO_{2e}/year. The logical conclusion is that this impact would be mitigated if project emissions are reduced to below 1,100 MT CO_{2e}/year. Yet, the mitigation provided in the EIR is entirely framed around consistency with GHG reduction targets adopted by the State that are based on a substantial linkage between the Project and the statewide reduction goals. FEIR at 3-33. But the FEIR admits elsewhere that no such statewide reduction targets that are linked to individual projects currently exist, and they may never exist. *See, e.g.*, FEIR at 3-30 ("There are no current mechanisms available to determine the level of GHG-efficiency needed on a single project in order to determine if it fits within the State's Scoping Plan targets."); *see also* FEIR at 3-34 ("It is unknown whether the project would achieve threshold targets because such targets do not yet exist and it is speculative to assume what they might be and/or what regulations will be in place to help achieve them."). Nor does the EIR offer a contingency plan if there are no such statewide goals in place. Thus, the mitigation is not only unrelated to the identified impact, it is illusory. PF29-35

This mitigation result is unacceptable under CEQA, especially where the County has at its fingertips a host of potentially feasible mitigation measures to reduce GHG emissions. Rather than defer mitigation measures and tie them to an uncertain statewide reduction plan, the EIR must require feasible mitigation *now* for the project's identified significant GHG impacts. The EIR claims "the cost and feasibility of certain policies that would be mandated as mitigation are not known." FEIR at 3-35. But it is the EIR's job to assess the feasibility of mitigation measures. Such measures are not unknown. Indeed, they are spelled out very specifically in our and others' comment letters, as well the FEIR.[10] *See, e.g.*, FEIR at 3.5-406–3.5-407 (SMW letter); FEIR at 3-34. The FEIR offers no valid rationale as to why the measures can't be evaluated now and required as conditions of approval for the project, and why offsets or other measures cannot be required if any of the identified measures prove infeasible or incapable of reducing the project's significant GHG impacts. PF29-35 cont.

As explained above, CEQA only allows deferral of mitigation where (1) practical considerations preclude development of the measures at the time of project approval, (2) the EIR contains criteria to govern the future actions implementing the mitigation, and (3) the agency has assurances that the future mitigation will be both "feasible and efficacious." *Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17. These criteria are not met here. Specifically, as discussed above, there is no practical impediment to developing mitigation as specific measures have already been identified. Further, the criteria provided are vague and illusory as no eligible statewide reduction goals have been identified that can be translated to sufficient project-level reductions. Thus, there are certainly no assurances

[10] In its response to comments, the FEIR claims baldly claims that the "applicant cannot feasibly incorporate measures such as car sharing programs and creating 'light vehicle' networks." FEIR at 3.5-456 (response to comment I041-63). It also claims that it evaluates measures "similar" to those proposed by Sierra Watch and MAP. *Id.* However, the EIR must provide more. Because the FEIR still lists the GHG impact as significant and unavoidable after mitigation, it must consider *all* feasible mitigation that might reduce the impact, and carefully consider the feasibility of each. There are many measures proposed by Sierra Watch, MAP, and others that the EIR has yet to consider. These include, for example, using zero emission vehicles for construction and people movement, reducing the use of pavement and impermeable surfaces, and providing educational resources on energy and vehicle uses.

that the identified mitigation will be feasible or efficacious since the identified mitigation may never come to fruition.

The FEIR claims the County prefers to defer mitigation because "GHG reduction measures will likely be feasible in the future that are not feasible at the time this Draft EIR is published." FEIR at 3.5-456. While the point is taken, it does not provide a justification for deferring all mitigation until the State or other agency adopts a reduction target that is based on a substantial linkage between the Project and the reduction goal. While the County could certainly include flexibility in its mitigation program, such as by analyzing feasibility and best technology available after certain increments of time, CEQA does not permit the County to kick the can down the road on all feasible mitigation to some unknown time in the future. Further, the current mitigation leads to a perverse incentive for the County to never develop an appropriate Climate Action Plan that coordinates local projects to statewide GHG reduction goals. PF29-35 cont.

In short, the EIR must evaluate any/all potentially feasible mitigation measures to reduce the significant GHG emissions identified. Further, if it decides to approve the proposed Project, it must adopt any/all feasible measures as an enforceable part of the Project approval.

III. The EIR's Alternatives Analysis Must Be Recirculated with Alternative 5 and Sierra Watch's and MAP's Suggested Alternative.

A. The EIR Must Be Recirculated for Public Comment on Alternative 5.

In response to comments that the FEIR failed to include a reasonable range of alternatives and should include additional reduced density alternatives, the FEIR adds a new alternative (Alternative 5) that involves a reduced density alternative on the East Parcel. *See* FEIR at 3-41. Alternative 5 would *not* include a conservation easement to preserve the remainder of the Project site. The FEIR claims that Alternative 5 "would reduce the severity of the impacts for all resources affected by the proposed project." FEIR at 2-42; *see also* FEIR at 2-43. The inclusion of such an alternative requires recirculation of the DEIR. CEQA Guidelines § 15088.5(a). Yet, the FEIR claims that recirculation is not required because "no feasible alternatives have been recommended that would avoid a significant impact." FEIR at 3-4. This is not the test. The CEQA Guidelines provide that an EIR must be recirculated if a "feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly PF29-36

lessen the significant environmental impacts of the project." CEQA Guidelines § 15088.5(a)(3).

There is no question that Alternative 5 is clearly different than other alternatives analyzed, because it involves a reduced density development on the *East Parcel* rather than the West Parcel, and fails to include a conservation easement on the East Parcel. Further, the FEIR claims that Alternative 5 would lessen the proposed Project's environmental impacts in every impact category. FEIR at 2-42, 2-43. Thus, CEQA's requirements for recirculation have been met here. PF29-36 cont.

It is especially important for the public to weigh in on Alternative 5 because it involves an entirely different development plan than the proposed Project in a currently undeveloped area. The public must be given the opportunity to thoroughly vet the EIR's conclusion that Alternative 5 would result in less environmental impacts than the proposed Project. Given Alternative 5's development on the East Parcel and the failure to include a conservation easement on either the West or the East parcel to prevent growth-inducing impacts on both parcels, it is highly questionable whether the alternative would, in fact, result in less impacts than the proposed Project in all impact categories. The FEIR's claims that Alternative 5 would result overall in less impacts are cursory and unsupported by substantial evidence. The FEIR also fails to provide substantial evidence as to why the alternative could not include a conservation easement on both or either the West Parcel and East Parcel. The FEIR cannot include an alternative to support a reasonable range of alternatives without substantiating its claims about that alternative or providing a meaningful opportunity to comment upon it.

B. The EIR Still Fails to Include a Reasonable Range of Alternatives, and Fails to Demonstrate that Sierra Watch's and MAP's Proffered Alternative is Patently Infeasible.

PF29-37

In our prior comments, we informed the County that the DEIR failed to evaluate a reasonable range of alternatives to the Project, especially in light of the fact that the EIR fails to evaluate a single alternative that would reduce one or more of the Project's primary significant impacts to less than significant. FEIR at 3.5-419–3.5-420. These include significant impacts to visual resources, transportation and circulation, and GHG emissions. Although the FEIR adds Alternative 5 and claims it lessens environmental impacts, the FEIR admits that alternative (like the others) "would not

avoid the significant and unavoidable impacts of the proposed MVWPSP."[11] FEIR at 2-42. The EIR must be recirculated to add at least one alternative that reduces one or more of these impacts to a less than significant level. *See* FEIR at 3.5-420 (and cases cited therein).

Sierra Watch and MAP suggested such a potentially feasible alternative, which involved reducing the number of units to produce a less than significant traffic impact, moving the access point for the Project off of 267 and to an existing intersection such as Highlands View Drive or Northstar Drive, and conservation of the Tahoe Basin portion of the property on the West side. *See* FEIR at 3.5-420–3.5-421. The FEIR is improperly dismissive of this alternative. First, it never treats the alternative as a whole package. Rather, it states the alternate entrance "was not considered because the physical impacts of such a connection would not reduce the magnitude of significant transportation impacts, because it would only shift trips between the project and Northstar off of SR 267 for a short distance." FEIR at 3-42. But the FEIR fails to acknowledge that the suggested alternative *also* involves the reduction in the number of units and thereby the volume of traffic. PF29-37 cont.

The FEIR also ignores the safety benefits that would result from moving the Project entrance off of SR 267. As currently proposed, the Project's sole point of access would be an unsignalized intersection with SR 267. As discussed above, this design is inherently hazardous as (1) motorists leaving the Project site would have to turn onto SR 267, which is a high-speed highway; and (2) the access road's steep terrain would make driving during winter conditions especially treacherous. Using Northstar Drive (a signalized intersection) as the point of access would eliminate both of these hazards.

In addition, moving the access road to Northstar Drive or another existing roadway would also preserve the visual integrity of SR 267, a designated scenic route. DEIR at 9-29. The stretch of SR 267 immediately adjacent to the Project site provides uninterrupted views of forest lands. In addition, an historic cabin is located immediately to the left of the proposed Project entrance adding to the bucolic setting. Construction of a new access roadway, along with other Project features including the Project's signage,

[11] Further, as explained above, it is doubtful that Alternative 5 would actually lessen environmental impacts and may very well, like Alternative 2, actually increase impacts. Thus, Alternative 5 does not contribute to a reasonable range of alternatives.

bus stop, and other necessary infrastructure would be visually intrusive. Leaving this stretch of highway in tact would substantially minimize the Project's visual impacts.

The FEIR claims that "access directly to and from Northstar would not be feasible and was not considered because the applicant does not control the property between Northstar and the West Parcel." FEIR at 3-41. Yet, this argument is unavailing. Courts have already rejected such a rationale for determining that an alternative is infeasible. *See Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1454-65 (rejecting argument that alternative involving land exchange was infeasible, finding EIR lacked substantial evidence that the land exchange could not be feasibly accomplished). The FEIR provides no substantial evidence that obtaining a roadway access easement from Northstar Resort/CNL, as proposed by Sierra Watch and MAP, would be infeasible. *See* FEIR at 3.5-421; Guidelines § 15126.6(f)(1).

PF29-37 cont.

Second, the FEIR claims that it need not evaluate an alternative involving conservation of the Tahoe Basin portion of the West Parcel, because "the Brockway Campground proposal is a separate project undergoing its own environmental review, and no development is proposed for this location associated with the MVWPSP." FEIR at 3-42. Even assuming *arguendo* that Brockway Campground is a separate project, which as explained *supra* Sierra Watch and MAP dispute, this excuse must fail. The Project proponent owns the Tahoe Basin portion of the land and preservation of this area is a feasible way to help lessen or avoid the Project's significant and cumulative traffic, visual, and GHG impacts. The FEIR does not, and cannot, deny this.

Third, the FEIR fails to provide an adequate response to why the document could not evaluate a feasible alternative that reduced the number of units to a level that would result in less than significant traffic impacts. In sum, the County must recirculate the EIR to fully evaluate the alternative proposed by Sierra Watch and MAP, or another alternative that would avoid the Project's primary significant environmental impacts.

Finally, the FEIR fails to provide any information regarding the feasibility of the alternatives presented in the EIR, and most notably the reduced density alternative (Alternative 3) that appears to be feasible and would meet Project objectives and reduce Project impacts. The County should not delay in making this information available to the public, as it is critical that the public review any evidence the County may rely upon in making its feasibility determination. As noted in our letter on the DEIR, the County cannot approve the project as proposed if there is a feasible alternative that would substantially lessen the project's significant impacts. Pub. Res. Code § 21002. An

alternative need not meet every project objective or be the least costly in order to be feasible. *See* CEQA Guidelines § 15126.6(b). PF29-37 cont.

IV. The EIR Must Be Recirculated.

Our comments on the DEIR set forth CEQA's standard for recirculation. FEIR at 3.5-421 (SMW letter, comment I041-84 (citing CEQA Guidelines § 15088.5)). As explained, the County must recirculate the EIR if (1) significant new information becomes available prior to certification, or (2) the EIR is so inadequate "that meaningful public review and comment were precluded." *Id.* The FEIR recognizes, as it must, that this is the correct standard, but it refuses to acknowledge that recirculation is required here. *See* FEIR at 3-2–3-4.

PF29-38

As demonstrated throughout this letter and in our comments on the DEIR, Sierra Watch, MAP, and others have presented information that reveals either new or more severe significant environmental impacts, or potentially feasible mitigation measures or alternatives to lessen these impacts, that have not been subject to review and comment in a DEIR. Furthermore, we have demonstrated that the EIR is fundamentally inadequate in several respects, including by improperly deferring analysis and mitigation under the guise of a "program EIR." The County must revise and recirculate the EIR to include a proper analysis and mitigation of all the Project's significant impacts. As it stands, the document fails as an informational document and violates CEQA. Accordingly, the County's proposed CEQA findings are unsupported and inadequate as a matter of law.

In conclusion, for the reasons set forth herein and in our comment letter on the DEIR, we respectfully request that the Planning Commission recommend denial of the Project unless and until the County complies with CEQA.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Amy J. Bricker

Amy J. Bricker
Laurel L. Impett, AICP, Urban Planner
Laura D. Beaton

List of Exhibits

Exhibit 1	"Using a Digital SLR Camera to Monitor Light Pollution", Zoltán Kolláth, Dark Skies Awareness, International Astronomical Union.
Exhibit 2	Review of Transportation and Circulation Analysis Martis Valley West Parcel Specific Plan Draft Environmental Impact Report, MRO Engineers, December 2, 2015.
Exhibit 3	Letter Report Re Review of Transportation and Circulation Analysis Martis Valley West Parcel Specific Plan Final Environmental Impact Report, MRO Engineers, June 01, 2016.
Exhibit 4	"Fugitive Dust Emissions from Paved Road Travel in the Lake Tahoe Basin", Dongzi Zhu, et al., Journal of the Air & Waste Management Association, Volume 59, October 2009.
Exhibit 5	"Spike in dead trees adds to fire danger", San Francisco Chronicle, May 18, 2016.
Exhibit 6	"Free Transit Attracts Riders, Helps Communities in More Ways Than One," Shareable, September 16, 2015.

789153.4

EXHIBIT 1

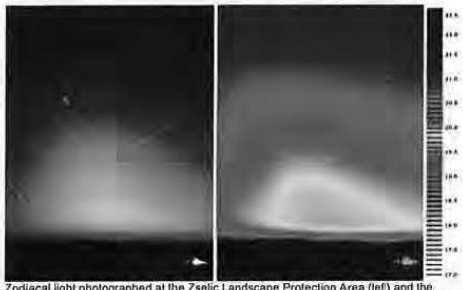
DARK SKIES AWARENESS

An IYA2009 Cornerstone Project

Using a Digital SLR camera to monitor light pollution

Zoltán Kolláth, Konkoly Observatory, Budapest, Hungary

Recent Digital Single Lens Reflex (DSLR) cameras provide a new opportunity to monitor the quality of the night sky and light pollution. Cameras that able to save images in an unaltered raw format, can be calibrated to get measurements of the luminance of the sky in a physical scale. Then the photo of the night sky can be converted to false colour images, which represents the distribution of sky brightness. In these pictures the colour represents the average amount of light arriving from a small portion of the sky, let's say from a 1 arcsecond by 1 arcsecond area, given in magnitudes. In this case the unit of the luminance is magnitude per square arcsecond (mag/sqas). Our experiments show that commercial DSLR cameras can easily reach 10 percent precision (e.g. 0.1 mag/sqas), when calibrated thoroughly.

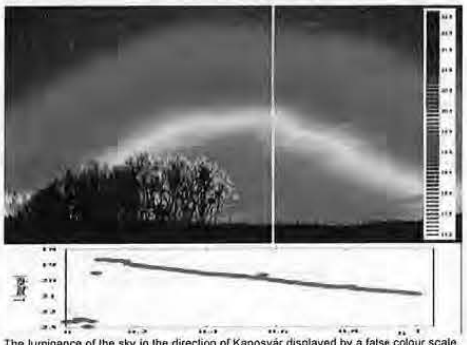


Zodiacal light photographed at the Zselic Landscape Protection Area (left) and the luminance on a false colour image (right). The diagonal line is the trail of ISS.

What are needed to took good pictures for night sky monitoring? Beside the camera, a tripod and a remote switch is essential, since long exposures are necessary at dark locations. For most of the cameras the longest exposure time, without a remote switch, is 30 seconds. That can be enough in urban locations; but under dark skies at least 3-5 minute long exposures are recommenced, even at ISO 800 setting. The histogram function of the camera can help in selecting the right exposure time: the peak in the histogram should be well defined. The widest available lens should be used, to get a large portion of the sky on the image. A fisheye lens gives the opportunity to display the light pollution for the whole sky from a single image.

The images should be stored in raw image format. Jpeg files incorporates lots of pre-processing which risks the calibration. For precise measurements dark frames (images with the same exposure but with the lens cap is on) have to be taken, it can be used to compensate for the noise in the sensor and electronics. A couple of dark images can be used for a whole night. Our preliminary results show that omitting the dark image results in a minor error in the luminance.

We have started a program to monitor the sky quality of Hungarian national parks and landscape protection areas. In the Zselic Landscape Protection Area we have preliminary results by a Canon EOS 350D camera. In the near future we will start a similar monitoring at the Hortobágy National Park. At both locations we will continue the measurements with circular fisheye lenses.



The luminance of the sky in the direction of Kaposvár displayed by a false colour scale. The bottom diagram shows the variation of the luminance along the vertical white line on the image.

To get as precise calibration as possible, we used different types of standard measurements and then compared the results: First the camera was calibrated in laboratory conditions: A screen was lit by stabilised light sources, and the luminance was measured by a professional luminance meter. The colour of light source was varied to get an estimate on the error due to the spectral effects (the spectral sensitivity of the camera is different from the standard filters of luminance measurements). These laboratory measurements are used also to fit the effect of vignetting of the lens. The above basic procedure was used to get images calibrated in standard luminance scale (cd/m^2). We converted these values to astronomical units by the following formula:

L [mag/sqas] = 0.17 - 2.5*log10(L[cd/m^2]/108000.0)

On the field we compared the numbers reduced from the DSLR images to measurements done by a professional imaging luminance meter. The resulted false colour images agreed to each other with the expected 10 percent precision. We use regularly Sky Quality Meters (SQM) to monitor the brightness of the sky. SQM values correlates well with the average luminance of the pictures taken by a wide-angle lens, when both devices are pointed to the zenith. The typical deviation between the SQM and DSLR measurement is about 0.04-0.06 mag/sqas. We also checked the linearity of the CCD by multiple exposures and different light levels. It is concluded that the raw images of a digital camera can be used for our purposes since the calibration errors do not exceed the precision needed for light pollution monitoring. Changes of weather conditions results in similar or larger errors than the interior error of our measurements.

This calibration procedure may be difficult for the average DSLR camera user. But for most of the applications it is not necessary to repeat all of our tests. We plan to make the user friendly "light" version of our software publicly available. Then with a few SQM measurements the predefined calibration of the program can be checked and refined to produce images like the ones in this page. Even if the absolute calibration of the system is not perfect, the method can be used to monitor the changes in local conditions. It would be a good idea to take such pictures during global events, like Earth Hour, to demonstrate the effects of different lighting conditions. A simple comparison of images taken with different snow coverage provides a simple test on the reflected amount of light in winter – just to mention a few possibilities for applications.

The edge of the forest – there is only minor pollution at the horizon due to distant sources. False colour image, the different blue tints represent sky brightness between 20.5 and 21.5 mag/sqas.

EXHIBIT 2

MRO ENGINEERS
660 Auburn Folsom Rd.
Suite 201B
Auburn, California
95603
PHONE (916) 783-3838
FAX (916) 783-5003

December 2, 2015

Ms. Laurel L. Impett, AICP
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, California 94102

Subject: ***Review of Transportation and Circulation Analysis***
Martis Valley West Parcel Specific Plan Draft Environmental Impact Report

Dear Ms. Impett:

As requested, MRO Engineers, Inc., has completed a review of the "Transportation and Circulation" analysis completed with respect to the proposed Martis Valley West Parcel Specific Plan in Placer County, California. The proposed project is the subject of a Draft Environmental Impact Report (DEIR), which was prepared by Ascent Environmental, Inc., for the Placer County Planning Services Division in October 2015. The DEIR incorporates a traffic impact analysis completed by Fehr & Peers.

This letter report documents the results of our detailed review of the Transportation and Circulation analysis presented in the DEIR.

PROJECT DESCRIPTION

The proposed Martis Valley West Parcel Specific Plan project would be located on a 662-acre site on the west side of State Route 267 (SR 267) between the Town of Truckee and the north shore of Lake Tahoe in Placer County, California. As proposed, the West Parcel development would include the following components (DEIR, p. 3-12 – 3-13):

- Residential – A maximum of 760 units consisting of a mix of single-family homes, townhomes, cabins, multi-family residences, and condominiums;
- Accessory Homeowner Amenities – 22,000 square feet (SF); and
- Commercial/Retail – A maximum of 34,500 SF on 6.6 acres, "which could be distributed throughout the Residential-designated area on parcels of any size." (DEIR, p. 3-17)

REVIEW OF TRANSPORTATION AND CIRCULATION ANALYSIS

The traffic and transportation system impacts associated with the Martis Valley West Parcel Specific Plan project are addressed in Chapter 10 – Transportation and Circulation of the DEIR. Our review of that analysis revealed several issues that must be addressed prior to approval by Placer County of the proposed project and its environmental documentation. These issues are presented below.

1. ***Incorrect Trip Generation Estimate*** – For the proposed commercial/retail component of the project, the volume of traffic for the various analysis time periods was appropriately estimated using information presented in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (Ninth Edition, 2012). Moreover, where possible and appropriate, the estimates were developed using the logarithmic equations provided, rather than the average trip rates. This is important because the average trip generation rates provided in the ITE *Trip Generation Manual*

do not accurately reflect the typical trip generation pattern for shopping centers (i.e., the bigger they get, the fewer trips they generate per 1,000 SF).

Despite this, however, the trip generation estimate for the proposed project contains several questionable elements, as detailed below.

A. Inaccurate Commercial/Retail Trip Generation Estimate

The trip generation estimates developed for the DEIR traffic analysis are summarized in Table 10-11. (DEIR, p. 10-23) As shown there, the commercial/retail space is treated as a single unit having 34,500 SF. However, as described above, the DEIR says that this space might be distributed throughout the project area. In other words, the commercial/retail space might actually be made up of several smaller commercial/retail facilities. To demonstrate the significance of this issue, Table 1 provides a trip generation comparison for the following three hypothetical commercial/retail development scenarios:

- Scenario A: A single building with 34,500 SF (as documented in the DEIR),
- Scenario B: Two commercial/retail buildings, each with 17,250 SF, and
- Scenario C: Three commercial/retail buildings, each with 11,500 SF.

Table 1
Commercial/Retail Trip Generation Comparison[1]

Size	Daily Trips	PM Peak-Hour Trips		
		In	Out	Total
Scenario A: One Commercial/Retail Building - 34,500 SF[2]				
34,500 SF	3,400	141	153	294
TOTAL	**3,400**	**141**	**153**	**294**
Scenario B: Two Commercial/Retail Buildings - 17,250 SF Each				
17,250 SF	2,167	89	96	185
17,250 SF	2,167	89	96	185
TOTAL	**4,334**	**178**	**194**	**370**
Difference[3]	**934 (+27%)**			**76 (+26%)**
Scenario C: Three Commercial/Retail Buildings - 11,500 SF Each				
11,500 SF	1,665	68	73	141
11,500 SF	1,665	68	73	141
11,500 SF	1,665	68	73	141
TOTAL	**4,995**	**204**	**219**	**423**
Difference[3]	**1,595 (+47%)**			**423 (+44%)**

Notes:
1 Reference: Institute of Transportation Engineers, *Trip Generation Manual*, 9th Edition, 2012.
2 As analyzed in the DEIR "Transportation and Circulation" section.
3 Difference compared to Scenario A.

The actual distribution and configuration of the commercial/retail space makes a substantial difference in terms of how much traffic is generated by that land use. As shown, if the space is provided in three equal-sized components, the daily trip generation is 47 percent higher than if all of the space is in a single location. In the PM peak hour, a 44 percent increase in trips would result from splitting the space up in this way.

B. Invalid Part-Time Residential Trip Generation Rates

The trip generation estimates for "part-time" or "second" homes were based on the average rates in the "Recreational Homes" land use category in the ITE *Trip Generation Manual*. That category is appropriate, except for the fact that (with the exception of the Sunday peak hour) the trip rates are based on studies at only two locations (i.e., they are the weighted average of two numbers). In fact, the pages in the *Manual* for weekday daily, weekday PM peak hour, and Sunday daily conditions each contain the following notation in **bold** font: "**Caution – Use Carefully – Small Sample Size**."

According to the ITE *Trip Generation Handbook* (Third Edition, August 2014, p. 26), selection of the appropriate trip generation factor should be based, in part, on the following guidelines:

- "Use [the] Fitted Curve Equation when:
  - A fitted curve equation is provided and the data plot has at least 20 data points"
- "Use [the] Weighted Average Rate when:
  - The data plot has at least three data points (and, preferably, six or more)"
- "Collect Local Data when:
  - Data plot has only one or two data points (and, preferably, when five or fewer);
  - Independent variable value is not within range of data"

As noted above, the "Recreational Homes" database presented in the ITE document is deficient, as it contains only two data points, rather than the three (or, preferably, six or more) called for.

Further, the number of second homes proposed at the West Parcel (620 dwelling units) is not within the range of the data set included in the *Trip Generation Manual*. Those two data points reflect projects with 700 units and about 1,480 units. Clearly, the West Parcel is smaller than the smaller of those two, so it is not within the range of the data presented in the *Trip Generation Manual*.

In summary, the trip generation rates presented in the "Recreational Homes" category in the ITE *Trip Generation Manual* cannot be considered to be reliable indicators of the volume of traffic associated with the 620 second/part-time homes, which represent over 80 percent of the residential development proposed at the West Parcel.

C. Incorrect Internal Trip Adjustment

The trip generation estimates documented in DEIR Table 10-11 include extensive adjustments to reflect "internal trips" at the proposed project. Internal trips are made completely within the boundaries of the proposed project; they never reach SR 267 or any other road outside the project itself. The primary example of this type of trip would be a project resident traveling to or from one of the commercial sites within the project. In

contrast, "external trips" have one end (either origin or destination) within the project and the other end outside the project. For example, a trip by a project resident from home to Truckee would be an external trip (as would the return trip).

The following adjustments were incorporated into the analysis to reflect internal travel within the project site (DEIR, pp. 10-21 – 10-22):

- Commercial: "Trips to and from the commercial areas are expected to be generated by the project's residential uses except for employee trips and deliveries. Therefore, to reflect a conservative approach, 80 percent of the commercial trips were assumed to be internal and 20 percent external."
- Residential – Second Homes: "No further reduction of internal trips for these Second Homes is necessary or warranted," because the internal trips are already accounted for within the trip generation rates for this land use.
- Residential – Full-Time Homes: "It was assumed 10 percent of trips by full-time residents would be to and from the internal commercial uses, while the remaining would be external trips."

First, we must point out that the internal trip percentages employed in the analysis are apparently arbitrary and without any basis in fact. No documentation or evidence is provided in support of the specific percentages. Instead, they seem to have been fabricated from thin air.

Second, we note that the same internal trip percentages have been applied to all time periods in the DEIR analysis. In reality, research indicates that these factors vary throughout the course of the day.

It is, therefore, inappropriate and incorrect to apply the same factors across the board for all time periods.

The internal capture percentages assumed for each land use are reflected in DEIR Table 10-11, which shows how much traffic the proposed project will generate. However, that table shows only the derived external trips; none of the internal trip values are presented, which prevents the reader from fully understanding the assumed travel patterns associated with the proposed project. To assist in providing such an understanding, we have prepared Tables 2 and 3, which present both internal and external trip estimates by land use for each of the analysis scenarios. Table 2 addresses weekday conditions, while Table 3 shows values for Sunday. (More detailed versions of these tables, in which the residential uses are broken down by type, are presented in Attachment A.)

As described above, the internal trips within the West Parcel will occur between the commercial/retail space and the full-time residential units. No internal trips were assumed to be associated with the part-time residential units, as those trips are already accounted for by the trip generation rates employed. (DEIR, p. 10-21)

Tables 2 and 3 reveal a significant problem that is common to all four analysis periods. In particular, the number of internal trips associated with the commercial/retail land use far exceeds the number of internal trips generated by the full-time residential units. In fact, on

In the winter, the northernmost segment of SR 267 is projected to operate at 148 percent of its capacity under Cumulative Plus Project conditions. Put another way, with the addition of project-generated traffic, it will carry over 37,000 vehicles per day, while its capacity is 25,000 vehicles per day. All five segments will again exceed capacity, and two of the segments will decline from "acceptable" conditions (LOS E) to LOS F (i.e., beyond capacity).

We note that these impacts were identified in the DEIR, but the magnitude of the impacts was substantially understated, so that the public was deprived of information concerning the true impacts of the proposed project.

Further, we note that each of these impacts has been defined as significant and unavoidable, so no mitigation will be implemented (or even attempted) to resolve these major deficiencies. It is inappropriate for the DEIR preparers to, in effect, walk away from these findings without making a greater effort to reduce or eliminate the traffic impacts. Mitigation options certainly exist – reduced project size or greater transit usage, for example.

In any event, the DEIR traffic impact analysis is significantly flawed and must be corrected. The revised analysis must then be recirculated for public review and comment.

D. Summer vs. Winter Trip Generation

Evidence presented in the DEIR clearly indicates that travel conditions vary substantially on a seasonal basis in the study area. For example, DEIR Table 10-6 (p. 10-9) shows existing traffic volumes for the seven segments of SR 267 evaluated in the Transportation and Circulation analysis. Without exception, the winter volumes are substantially greater than the summer volumes. The winter volumes are typically 20 – 25 percent higher than the summer volumes, although in one case the winter traffic level is over 90 percent higher.

According to Tahoe Regional Planning Agency (TRPA) records, this differs from conditions in the region as a whole, where July and August are the busiest months. (TRPA, *2012 Transportation Monitoring* Report, Figure 14, p. 16.) Apparently, the abundant winter recreational activities along SR 267 attract sufficient visitors to result in a significant increase in travel demand during that season.

The data in the ITE *Trip Generation Manual* represents "typical" conditions, and would not reflect the increased level of traffic demand associated with these unique winter conditions. Therefore, while the ITE information is suitable for use in estimating the proposed project's trip generation for summer conditions, it will under-estimate the volume of project traffic in the winter, when the large number of part-time/second home owners arrive to ski, snowshoe, etc.

Because of the substantial seasonal variation documented in the DEIR, it is essential that the estimates of project-generated traffic accurately reflect conditions during each of the analysis time periods. In short, separate trip generation estimates are required for summer and winter conditions.

2. ***Failure to Identify Significant Intersection Impact*** – DEIR Table 10-12 (p. 10-27) provides intersection delay and level of service values for Existing Plus Project conditions. It identifies three intersections (two signalized, one side-street stop-controlled) as having significant impacts.

weekdays the commercial-based internal trips exceed the total number of trips generated by the full-time residential units.

- Weekday Daily Conditions
  - Full-time Residential Internal Trips: 118
  - Full-time Residential Total Trips: 1,184
  - Commercial/Retail Internal Trips: 2,720, which is 23 times the number of residential internal trips and over double the total number of full-time residential trips.
- Weekday PM Peak Hour
  - Full-time Residential Internal Trips: 12
  - Full-time Residential Total Trips: 121
  - Commercial/Retail Internal Trips: 235, which is 19 times the number of residential internal trips and almost double the total number of full-time residential trips.
- Sunday Daily Conditions
  - Full-time Residential Internal Trips: 105
  - Full-time Residential Total Trips: 1,055
  - Commercial/Retail Internal Trips: 697, which is over six times the number of residential internal trips and about two-thirds the total number of full-time residential trips.
- Sunday Peak Hour
  - Full-time Residential Internal Trips: 11
  - Full-time Residential Total Trips: 104
  - Commercial/Retail Internal Trips: 86, which is almost eight times the number of residential internal trips and over 80 percent of the total number of full-time residential trips.

Having the number of internal trips associated with the commercial land use far exceed the number of such trips associated with the residential land use is illogical and incorrect. These numbers must match, as they are essentially the same trip (i.e., a trip origin at a residence with a destination at a commercial site, or vice versa). As will be described below, a balancing process must be undertaken to ensure that these numbers match. That process was apparently ignored in the DEIR analysis.

In short, the number of internal trips generated by the commercial space has clearly been grossly over-estimated. Consequently, the number of external trips has been substantially under-estimated.

Table 2
DEIR Project Trip Generation Estimates[1]
Weekday Internal, External and Total Trips

Land Use	Size	Internal Capture	Project Trip Estimate		
			Internal	External	Total
Weekday Daily Conditions					
Full-Time Residential[2]	140 DU[3]	10%	118	1,066	1,184
Part-Time Residential[4]	620 DU	0%	0	2,239	2,239
Commercial/Retail	34,500 SF[5]	80%	2,720	680	3,400
		TOTAL	**2,838**	**3,985**	**6,823**
Weekday PM Peak-Hour Conditions					
Full-Time Residential[2]	140 DU	10%	12	109	121
Part-Time Residential[4]	620 DU	0%	0	162	162
Commercial/Retail	34,500 SF	80%	235	59	294
		TOTAL	**247**	**330**	**577**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Includes 100 single-family homes and 40 townhomes.
3 Dwelling unit.
4 Includes 400 single-family homes, 160 townhomes, and 60 cabins.
5 Square feet.

Table 3
DEIR Project Trip Generation Estimates[1]
Sunday Internal, External and Total Trips

Land Use	Size	Internal Capture	Project Trip Estimate		
			Internal	External	Total
Sunday Daily Conditions					
Full-Time Residential[2]	140 DU[3]	10%	106	950	1,056
Part-Time Residential[4]	620 DU	0%	0	1,817	1,817
Commercial/Retail	34,500 SF[5]	80%	696	174	870
		TOTAL	**802**	**2,941**	**3,743**
Sunday Peak-Hour Conditions					
Full-Time Residential[2]	140 DU	10%	***11***	***93***	***104***
Part-Time Residential[4]	620 DU	0%	***0***	***224***	***224***
Commercial/Retail	34,500 SF	80%	***86***	***22***	***108***
		TOTAL	**97**	**339**	**436**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Includes 100 single-family homes and 40 townhomes.
3 Dwelling unit.
4 Includes 400 single-family homes, 160 townhomes, and 60 cabins.
5 Square feet.

The ITE *Trip Generation Handbook* presents detailed guidance with respect to analyzing internal trips at mixed-use developments, such as the West Parcel. The Third Edition (August 2014, p. 45) of that document provides four basic premises that form the basis for evaluating internal capture. One of those is particularly relevant:

> *"**Premise 4**: The number of trips from a land use within a mixed-use development to another land use within the same mixed-use development (that is, an internal trip) is a function of the size of the "receiving" land use and the number of trips it attracts, as well as the size of the "originating" land use and the number of trips it sends.* ***The number of trips between a particular pair of internal land uses is limited to the smaller of these two values.****"* [Emphasis in original.]

The document goes on to say (p. 45):

> *"Key to the success of this methodology in replicating internal capture patterns at mixed-use sites is its balancing step that constrains internal trip-making to realistic levels given the mix of land uses."*

And further (p. 61):

> *"1. Estimates for each individual and use are based on the quantity of that land use and its capacity to send or receive internal trips. Without balancing, there is no assurance there is enough capacity on the receiving end to accept as many trips as are being sent.*
>
> *2. The total trips sent internally (that is, internally captured trips) from one use to another must equal the number received at the other end of the trip. Both numbers must be the same."*

The balancing step referred to above is the missing element in the West Parcel trip generation analysis. As a result of the failure to perform this step, the analysis fails to reflect that the internal trip-making capacity of the commercial/retail space vastly exceeds the corresponding capacity of the residential units.

"Volume 1: User's Guide and Handbook" of the ITE *Trip Generation Manual* presents a method for estimating internal trips at multi-use developments, including a set of templates incorporating the balancing procedure referenced above. Attachment B contains copies of those forms, which have been completed using the pertinent information for each of the analysis periods addressed in the West Parcel traffic analysis. Tables 4 and 5 summarize the results of that process for weekdays and Sundays, respectively. (More detailed versions of these tables, in which the residential uses are broken down by type, are presented in Attachment C. Table C-1 addresses weekday conditions, while Table C-2 shows values for Sunday.)

Table 4 shows that, under weekday daily conditions, correctly applying the internal trip estimation process indicates that the total number of internal trips at the West Parcel will be 236, which represents a three percent internal trip rate when combined with the 6,587 external trips. In the weekday PM peak hour, a total of 24 internal trips are expected, which is equivalent to four percent of the total number of 577 project trips.

Sunday conditions are shown on Table 5. Over the course of a Sunday, the correctly applied internal trip estimation process reveals a total of 212 internal trips out of the total of 3,743 – a six percent internal trip rate. During the Sunday peak hour, 22 internal trips are forecast, which represents five percent of the total of 436 trips.

Table 4
Corrected Project Trip Generation Estimates[1]
Weekday Internal, External and Total Trips

Land Use	Size	Internal Capture	Project Trip Estimate		
			Internal	External	Total
Weekday Daily Conditions					
Full-Time Residential[2]	140 DU[3]	10%	118	1,066	1,184
Part-Time Residential[4]	620 DU	0%	0	2,239	2,239
Commercial/Retail	34,500 SF[5]	80%	118	3,282	3,400
		TOTAL	**236**	**6,587**	**6,823**
Weekday PM Peak-Hour Conditions					
Full-Time Residential[2]	140 DU	10%	12	109	121
Part-Time Residential[4]	620 DU	0%	0	162	162
Commercial/Retail	34,500 SF	80%	12	282	294
		TOTAL	**24**	**553**	**577**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Includes 100 single-family homes and 40 townhomes.
3 Dwelling unit.
4 Includes 400 single-family homes, 160 townhomes, and 60 cabins.
5 Square feet.

Table 5
Corrected Project Trip Generation Estimates[1]
Sunday Internal, External and Total Trips

Land Use	Size	Internal Capture	Project Trip Estimate		
			Internal	External	Total
Sunday Daily Conditions					
Full-Time Residential[2]	140 DU[3]	10%	106	950	1,056
Part-Time Residential[4]	620 DU	0%	0	1,817	1,817
Commercial/Retail	34,500 SF[5]	80%	106	764	870
		TOTAL	**212**	**3,531**	**3,743**
Sunday Peak-Hour Conditions					
Full-Time Residential[2]	140 DU	10%	11	93	104
Part-Time Residential[4]	620 DU	0%	0	224	224
Commercial/Retail	34,500 SF	80%	11	97	108
		TOTAL	**22**	**414**	**436**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Includes 100 single-family homes and 40 townhomes.
3 Dwelling unit.
4 Includes 400 single-family homes, 160 townhomes, and 60 cabins.
5 Square feet.

Of particular interest in the traffic impact analysis, of course, are the external trips. Those are the trips that will be added to the study area intersections and road segments and will, therefore, result in the project's impact on the nearby transportation system. Table 6 summarizes a comparison of the faulty external trip estimates employed in the West Parcel DEIR traffic analysis versus the estimates documented in Tables 4 and 5, which are based on correctly balancing the internal trips among the on-site land uses. For added perspective, the internal and total trip values are also shown, as well as the difference between the DEIR values and the corrected values. Those differences are summarized here:

- Weekday Daily Conditions – The DEIR under-estimated external project travel by 2,602 trips (i.e., 65 percent),
- Weekday PM Peak-Hour Conditions – The DEIR under-estimated external project travel by 223 trips (i.e., 68 percent),
- Sunday Daily Conditions – The DEIR under-estimated external project travel by 590 trips (i.e., 20 percent), and
- Sunday Peak-Hour Conditions – The DEIR under-estimated external project travel by 414 trips (i.e., 22 percent).

Table 7 illustrates the effect of assigning these additional external trips to SR 267 in the study area, in accordance with the project trip distribution employed in the traffic analysis. That trip distribution is generally as follows:

- Summer: 65 percent north / 35 percent south, and
- Winter: 70 percent north / 30 percent south.

Table 7 presents the projected traffic volumes, volume/capacity (V/C) ratios, and levels of service for the segments of SR 267 under Placer County's jurisdiction for both Existing Plus Project and Cumulative Plus Project conditions.

Under Existing Plus Project conditions in the summer, the project alone consumes up to 21 percent of the total roadway capacity. Specifically, on the two segments between Northstar Drive and the Project Access Road, the project will cause the V/C ratio to increase from 0.58 (i.e., 58 percent of capacity) to 0.79 (i.e., 79 percent of capacity). In the winter, the project will consume the equivalent of 22 percent of the highway's capacity on those same two segments, increasing the V/C ratio to as high as 0.93 on a typical weekday.

While the project's incremental impact is generally similar under cumulative conditions, the end result is even worse, as SR 267 is projected to operate at or beyond capacity even without the project-generated traffic. In the summer, the highway is expected to have a V/C ratio of 1.20 just south of the Placer County line, representing operation at 20 percent beyond capacity. When the project traffic is added, this will increase to 1.37 – a full 37 percent in excess of capacity. None of the segments of SR 267 will operate below capacity. South of the project access road, SR 267 will be three percent beyond capacity, while to the north of the project, it will range from 13 percent to 37 percent above capacity. Two of the highway segments will be degraded from an "acceptable" LOS E to an unacceptable LOS F.

Table 6
Trip Generation Comparison

Land Use	DEIR Trip Generation Estimate[1]			Corrected Trip Generation Estimate		
	Internal	External	Total	Internal	External	Total
Weekday Daily Conditions						
Full-Time Residential	118	1,066	1,184	118	1,066	1,184
Part-Time Residential	0	2,239	2,239	0	2,239	2,239
Commercial/Retail	**2,720**[2]	**680**	3,400	**118**	**3,282**	3,400
TOTAL	**2,838**	**3,985**	6,823	**236**	**6,587**	6,823
Difference Compared to DEIR				**-2,602**	**+2,602**	0
Weekday PM Peak-Hour Conditions						
Full-Time Residential	12	109	121	12	109	121
Part-Time Residential	0	162	162	0	162	162
Commercial/Retail	**235**	**59**	294	**12**	**282**	294
TOTAL	**247**	**330** **165 In/165 Out**	577	**24**	**553** **273 In/280 Out**	577
Difference Compared to DEIR				**-223**	**+223** **108 In/115 Out**	0
Sunday Daily Conditions						
Full-Time Residential	106	950	1,056	106	950	1,056
Part-Time Residential	0	1,817	1,817	0	1,817	1,817
Commercial/Retail	**696**	**174**	870	**106**	**764**	870
TOTAL	**802**	**2,941**	3,743	**212**	**3,531**	3,743
Difference Compared to DEIR				**-590**	**+590**	0
Sunday Peak-Hour Conditions						
Full-Time Residential	11	93	104	11	93	104
Part-Time Residential	0	224	224	0	224	224
Commercial/Retail	**86**	**22**	108	**11**	**97**	108
TOTAL	**97**	**338** **162 In/176 Out**	436	**22**	**414** **200 In/214 Out**	436
Difference Compared to DEIR				**-75**	**+76** **38 In/38 Out**	0

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Differences between DEIR and corrected estimates are shown in **bold** font in shaded cells.

Table 7
Corrected Roadway Segment Levels of Service

SR 267 Segment	"No Project" Level of Service Results[1]			Corrected "With Project" Level of Service Results		
	Volume	LOS	V/C[2]	Volume	LOS	V/C
Existing + Project - Summer						
Placer County Line to Schaffer Mill Rd.	15,300	D	0.61	19,421	E	0.78
Schaffer Mill Rd. to Northstar Dr.	14,390	D	0.58	18,591	E	0.74
Northstar Dr. to Highlands View Rd.	12,280	E	0.58	16,521	E	0.79
Highlands View Rd. to Project Access Road	12,240	E	0.58	16,521	E	0.79
Project Access Road to SR 28	12,240	E	0.58	14,546	E	0.69
Existing + Project – Winter						
Placer County Line to Schaffer Mill Rd.	18.970	E	0.76	23,181	E	0.93
Schaffer Mill Rd. to Northstar Dr.	17,920	E	0.72	22,211	E	0.89
Northstar Dr. to Highlands View Rd.	14,860	E	0.71	19,431	E	0.93
Highlands View Rd. to Project Access Road	14,620	E	0.70	19,231	E	0.92
Project Access Road to SR 28	14,620	E	0.70	16,596	E	0.79
Cumulative + Project - Summer						
Placer County Line to Schaffer Mill Rd.	30,080	F	1.20	34,201	F	1.37
Schaffer Mill Rd. to Northstar Dr.	25,290	F	1.01	29,491	F	1.18
Northstar Dr. to Highlands View Rd.	22,420	F	1.07	26,661	F	1.27
Highlands View Rd. to Project Access Road	19,400	E	0.92	**23,681**	**F**	**1.13**
Project Access Road to SR 28	19,400	E	0.92	**21,706**	**F**	**1.03**
Cumulative + Project - Winter						
Placer County Line to Schaffer Mill Rd.	32,810	F	1.31	37,021	F	1.48
Schaffer Mill Rd. to Northstar Dr.	27,240	F	1.09	31,531	F	1.26
Northstar Dr. to Highlands View Rd.	22,090	F	1.05	26,661	F	1.27
Highlands View Rd. to Project Access Road	19,430	E	0.93	**24,041**	**F**	**1.14**
Project Access Road to SR 28	19,430	E	0.93	**20,625**	**F**	**1.02**

Notes:
[1] Reference: DEIR, Table 10-13 – Roadway Segment Levels of Service – Existing Plus Project Conditions (p. 10-23) and DEIR Table 10-19 – Roadway Segment Levels of Service – Cumulative Plus Project Conditions (p. 10-4).
[2] Volume/capacity ratio.

Review of the intersection level of service calculation sheets in DEIR Appendix I, however, reveals that the summer PM peak-hour delay value and level of service for the intersection of SR 267/Project Access Roadway was incorrectly reported. According to Table 10-12, that location would have a worst-case delay value of 23 seconds/vehicle and an acceptable level of service of LOS C under Existing Plus Project conditions. The level of service calculation sheet (presented here as Attachment D) shows that the worst-case movement (the northbound left turn) would actually have a delay value of 55 seconds/vehicle and would operate at an unacceptable LOS F. This is an unreported significant impact, which must be mitigated.

Of course, this situation will be even worse when the trip generation estimates are corrected, as described above. That is, the number of external trips will increase, which will increase the project-generated demand on the critical left-turn movement and the other, conflicting movements at the SR 26/Project Access Roadway intersection. The end result will be a delay value that is somewhat greater than 55 seconds/vehicle.

To determine the specific effect of the additional external trips, we have performed a modified intersection level of service calculation with a corrected set of project trip generation figures. The specific SR 267/Project Access Roadway intersection traffic volumes used in the two calculations are listed below:

	DEIR	Corrected
• Project traffic		
o Inbound left turn	57	96
o Inbound right turn	108	177
o Outbound left turn	108	182
o Outbound right turn	57	98
• SR 267 through traffic		
o Southbound	585	585
o Northbound	438	438

Attachment E contains a copy of our level of service calculation sheet with the corrected project trip generation numbers. As shown there, the critical movement (i.e., the inbound left turn) at the SR 267/Project Access Roadway intersection will have a delay value of 225.1 seconds/vehicle and will operate at LOS F. Put another way, on average, a driver desiring to turn left into the project site from northbound SR 267 will wait 3 minutes and 45 seconds for an adequate gap in oncoming traffic before being able to enter the site.

In summary, this is a significant impact (even without the corrected trip generation numbers), which was not revealed in the DEIR. Consequently, no mitigation measure was identified to remedy the project-related operational deficiency. This is a substantial flaw in the DEIR, which requires revision and recirculation.

3. ***Incomplete Set of Peak-Hour Traffic Analysis Scenarios*** – The traffic impact analysis addressed conditions in the following peak-hour scenarios:

   - Summer Friday PM Peak Hour, and

- Winter Sunday PM Peak Hour.

The choice of the summer Friday PM peak-hour period is based on the following statement (DEIR, p. 10-4):

> *For this DEIR, the summer condition is represented by a Friday afternoon peak hour in August . . . Friday afternoon conditions typically represent peak conditions resulting from various recreational activities and overnight visitor travel to seasonal residences, rentals, or other lodging accommodations.*

In contrast, the winter conditions traffic analysis addressed Sunday conditions and, specifically, the supposed "30th highest peak hour of the ski season." The DEIR says (p. 10-4):

> *Sunday p.m. peak-hour counts were conducted because this is generally the peak travel period during the winter season, especially adjacent to ski resorts.*

Although the DEIR does not say so, these two time periods clearly represent traffic arriving for weekend visits and traffic departing at the end of a recreational weekend. That being the case, it makes sense to analyze both ends of the weekend in both the summer and the winter. All of the same conditions regarding "recreational activities and overnight visitor travel" that are used to justify the summer Friday analyses also apply to a winter Friday. And the peak travel conditions associated with a winter Sunday afternoon also apply to a summer Sunday afternoon.

While the two peak-hour scenarios presented in the DEIR may contribute to a limited understanding of the traffic impacts associated with the proposed project, those impacts will not be fully revealed and understood until analysis scenarios addressing conditions during the summer Sunday PM peak hour and the winter Friday PM peak hour are completed and distributed for public review.

4. ***Failure to Analyze Project Impacts on the Interstate 80 Freeway*** – The DEIR presents a reasonably in-depth analysis of traffic operations on SR 267. However, only limited consideration is given to the potential impacts of the proposed project on Interstate 80 (I-80), which will serve a substantial portion of the project-generated traffic. In fact, according to the DEIR (p. 10-3):

> *Interstate 80 (I-80) provides primary regional access to the study area.*

Further, the DEIR (p. 10-22) states that 35 percent of the summer project traffic will use I-80, with 23 percent to and from the west (i.e., to/from Sacramento and the San Francisco Bay Area) and 12 percent to/from the east. In the winter, 39 percent of the project traffic will use I-80, with 25 percent to/from the west and 14 percent to/from the east.

In contrast to this assumed geographic distribution of project trips, according to travel surveys conducted at Squaw Valley and employed in the recent DEIR for the Village at Squaw Valley project, 51 percent of overnight guests at Squaw Valley are from the San Francisco Bay Area or the Sacramento/Central Valley area. This value, which is based on actual surveys, is approximately double the assumed amount of I-80 project traffic in the Martis Valley DEIR. Attachment F contains Table 9-15 from the Village at Squaw Valley DEIR, which shows that 13 percent of summer overnight guests at Squaw Valley are from the Sacramento/Central Valley area and 38 percent are from the San Francisco Bay Area. Although the two projects are not

identical, they are sufficiently similar that the project trip distribution parameters should not vary substantially, and certainly not by the amount suggested here.

Despite the significant role that I-80 will play in accommodating project traffic, no analysis of the I-80 mainline is provided in the DEIR.

Further, although the DEIR (p. 10-3) claims to have analyzed the I-80 eastbound and westbound on- and off-ramp at SR 267, this is not truly the case. Instead, only the ramp merge and diverge areas were addressed. (DEIR, p. 10-7, 10-9, and 10-45) These are the locations where the on- and off-ramps join or depart from the freeway mainline. No analysis is provided to indicate the project's impacts on the ramps themselves, however, or, as mentioned above, the freeway mainline.

Among the intersections included in the analysis are SR 267/I-80 Westbound Ramps and SR 267/I-80 Eastbound Ramps. DEIR Exhibit 10-6 (p. 10-25) illustrates the "Project-Only" trips. Review of that figure reveals that a total of 74 PM peak-hour project-generated trips were assigned to/from the west on I-80 on a summer Friday. In that same summer Friday PM peak-hour period, 40 project-related trips were assigned to/from the east on I-80. During the winter Sunday peak hour, 84 trips were oriented to/from the west on I-80, while 48 trips traveled to/from the east.

However, as described in detail above, these volumes are substantially under-stated. As presented in Table 6 above, the DEIR failed to account for 223 Friday PM peak-hour trips and 75 Sunday peak-hour trips. Based on the trip distribution used in the DEIR and the corrected trip generation estimate presented here, an additional 77 PM peak-hour trips would use I-80 in the Friday PM peak hour, for a total of 191. In the winter Sunday peak hour, an additional 29 project-related vehicles would use I-80, for a total of 161.

Despite the fact that I-80 was projected to carry a substantial portion of the traffic generated by the proposed project, no analysis was conducted to assess potential project-related traffic impacts on the I-80/SR 267 on- or off-ramps or the freeway mainline. Consequently, it is impossible to determine whether the proposed project will adversely impact traffic operations on the freeway or its ramps. To ensure a thorough analysis of potential traffic impacts, it is essential that these analyses be performed and documented in a revised DEIR.

5. ***Cumulative Conditions Traffic Volume Estimates and Analysis*** – The cumulative conditions analysis presented in the DEIR addresses projected traffic operations in the year 2034. However, as described on p. 10-37 of the DEIR, the year 2034 traffic volumes are actually year 2025 traffic volume projections. That is, the Town of Truckee's TransCAD travel demand forecasting model was used to create estimates of traffic in the year 2025 (when the Town of Truckee General Plan is assumed to be built out), ". . . with minimal development expected thereafter." (DEIR, p. 10-37) In effect, zero traffic growth was assumed for nine of the nineteen years included in the cumulative conditions analysis (i.e., from 2025 through 2034).

   Even though the year 2025 traffic projections represent buildout of the Truckee General Plan (DEIR, p. 10-37], the approach employed in the analysis fails to reflect traffic increases associated with growth beyond Truckee's boundaries (e.g., in unincorporated Placer or El Dorado County), which would not be reflected in the Town's General Plan land use.

   The use of 2025 traffic volume projections is inappropriate unless the analysis is described as being for that year. To suggest that the analysis covers a nineteen-year time period when it

actually considers only ten years is misleading. The cumulative conditions analysis must be revised using valid estimates of year 2034 traffic volumes, then recirculated for public review.

Even with these deficient traffic volume forecasts, the DEIR concludes that the project's cumulative transportation impacts would be significant. However, because the DEIR substantially underestimated the magnitude of the project-specific impacts (as described in detail above), it also underestimates the project's cumulative impacts.

6. ***Safety-Related Impacts*** – The DEIR concludes that the project will result in no significant safety-related impacts. (DEIR, p. 10-36) However, the entire focus of the safety discussion concerns chain controls on SR 267. Specifically, the DEIR says:

   Because the project would provide advanced notice of chain requirements and space outside of the Caltrans right-of-way and the main project access road easement for the installation of chains before cars exit the project site, the project would not result in a substantial increase in hazards due to design features or incompatible uses, and this would be a ***less-than-significant*** *impact.* [Emphasis not added.]

   This limited perspective ignores other relevant considerations, however. For example, what is the effect of the project-generated traffic on the ability of emergency vehicles to respond to an incident at or near the project site? Similarly, what will be the effect of the project if an evacuation is needed, in the event of a wildfire, for example? These questions are addressed in greater detail below under "Emergency Vehicle Access."

   Furthermore, the safety analysis completely ignores an issue cited at DEIR p. 10-42, "Cumulative Mitigation Measure 10-8f: Pay Placer County fee for future roadway improvements, including the SR 267/Project Access Road intersection." The DEIR states:

   Although the widening of this intersection plus the installation of a traffic signal or two-lane roundabout would result in acceptable levels of service, Caltrans would not support either signalization or a roundabout because of the steep grade of SR 267 (over 4 percent) at this location and the resulting potential of rear-end collisions, especially in snowy conditions."

   This raises the obvious question: If it is not safe to install a traffic signal or a roundabout, how can it possibly be safe to allow project traffic to enter the highway from a stop sign, with through traffic on SR 267 moving at free-flow speeds of 55 – 60 MPH? Whereas the DEIR expresses concern regarding potential rear-end collisions, vehicles turning onto SR 267 from a stop will be subject to broadside collisions, which are generally more severe than rear-end collisions.

   This is clearly a significant impact related to "a substantial increase in hazards due to design features," which is not acknowledged in the DEIR.

7. ***Emergency Vehicle Access*** – The DEIR contains a cursory discussion of emergency access issues within and near the West Parcel Specific Plan area, including descriptions of two emergency vehicle access roads. (DEIR, p. 10-27) However, the project-related impacts on off-site emergency vehicle response are virtually ignored.

   SR 267 is the only roadway by which emergency vehicles could approach or depart the proposed project. What will be the effect on emergency vehicle response time when the entire length of SR 267 between the Placer County line and SR 28 operates at LOS E under Existing Plus Project

conditions (DEIR Table 10-13, p. 10-30)? Or when all of the segments of SR 267 between the Town of Truckee and the project access road operate at LOS F, with V/C ratios as high as 1.41 (indicating operation at 41 percent beyond capacity) under Cumulative Plus Project conditions (DEIR Table 10-19, p. 10-44)?

The DEIR fails to include even a superficial evaluation of the effects of this extreme congestion on emergency vehicle response times. Further, it contains no quantitative analysis with respect to whether adequate capacity exists on SR 267 to accommodate the crush of traffic that will occur during an evacuation, such as during a wildfire. On a "typical" day, the added delays caused by the proposed project's traffic would be inconvenient for residents and first responders. On a day when a wildfire threatens, the effects of the additional traffic could be dire.

8. ***Deficient Mitigation Measures*** – The DEIR presents a number of mitigation measures aimed at offsetting the significant impacts identified in the Transportation and Circulation section. However, virtually all of the significant impacts to intersections and roadway segments were ultimately deemed "significant and unavoidable" because they would occur on the Caltrans state highway system and, therefore, there is no certainty that any identified mitigation measures would ever be implemented. We have several comments relating to this.

   - With regard to those significant and unavoidable impacts, we believe it bears noting that this finding will ensure the continued presence of substantial traffic congestion in the vicinity of Martis Valley and could even result in the creation of hazardous conditions.

     First, it should be noted that LOS F is defined as a condition under which traffic demand exceeds the capacity of the roadway facility. For traffic signal-controlled intersections, LOS F means that the average driver will be delayed for over 80 seconds. At a stop sign, a driver would be delayed for over 50 seconds. On a segment of roadway, it means stop-and-go operation with delays and the constant threat of a rear-end collision.

     According to the DEIR traffic analysis, three of the eight study intersections will operate at LOS F under Existing Plus Project conditions and six of the eight will do so under Cumulative Plus Project conditions. (These numbers do not reflect the errors in calculation of internal trips, as described above, so they might actually be worse.) Five of seven roadway segments will be at LOS F under Existing Plus Project conditions, while all seven will operate at LOS F under Cumulative Plus Project conditions.

     Because of the failure to provide any form of mitigation for these deficient traffic operations, and no matter how much congestion exists or how long delays might become at the study intersections, traffic operations will continue to be at LOS F, with no hope of improvement.

     Operation at LOS F will have safety impacts, as well. For example, intersection delays such as those described above typically result in extensive queues of vehicles waiting to pass through an intersection. Such queues can be a serious impediment to the flow of emergency vehicles. Delays to ambulances or police or fire vehicles can obviously have life or death consequences. This is a particular concern in rural or mountainous areas, such as Martis Valley, where the road system is constrained by topography and few (if any) alternative emergency access routes are available.

     In addition, continuation of unacceptable traffic operations in perpetuity, as envisioned by the DEIR, will almost certainly result in adverse impacts in the form of air quality and greenhouse gas emission deficiencies.

Finally, we note once again that simply resorting to a finding of "significant and unavoidable" for these numerous traffic impacts is unacceptable. Consideration must be given to other potential forms of mitigation, including (but not limited to) a reduced project size or greater transit usage, for example.

- Mitigation Measure 10-1a and Mitigation Measure 10-1b: Optimize signal timing at two locations (DEIR, p. 10-28) – Generally speaking, traffic signals in the State of California respond directly to traffic demand, automatically adjusting the amount of time allocated to any particular movement (i.e., left turns, through movements, or right turns). Consequently, a mitigation measure calling for signal optimization might have little or no effect. In fact, the DEIR provides no evidence of the supposed beneficial effect of these proposed mitigation measures in reducing the project-related impact, other than a vague, unsubstantiated statement that the intersection operations would be improved to LOS C.

- Mitigation Measure 10-1c: Provide signage on Highlands View Road to divert traffic to Ridgeline Drive and Northstar Drive (DEIR, p. 10-28) – This mitigation measure represents an attempt to divert drivers from their intended route to an alternate route, in hopes of offsetting a project-related impact. According to the "analysis" of the measure's effectiveness (DEIR, p. 10-28), the alternate route along Ridgeline Drive and Northstar Drive is "likely more attractive" and "0.2 miles less distance" (i.e., shorter) than the primary route along Highlands View Road. It concludes that the impact at SR 267/Highlands View Road would be reduced to less than significant, while maintaining acceptable operations along the recommended route. DEIR Appendix I contains no level of service calculations for mitigated conditions, so it is impossible to verify the claimed beneficial effect of the measure.

  We have several questions about this measure, the most basic of which is, how do we really know it will work? If it's such an attractive route, why are 75 winter peak-hour drivers ignoring it and making a left turn from Highlands View Road onto SR 267? How many vehicles would need to be diverted to reduce the impact to less than significant? How many were assumed to do so? Is there a meaningful basis for the number of diverted vehicles, or was it simply an arbitrary assumption?

- Mitigation Measure 10-5a: Payment of annual transit fees and Mitigation Measure 10-5b: Join and maintain membership in the Truckee-North Tahoe Transportation Management Association (DEIR, p. 10-33) – These measures are aimed at mitigating the project's transit impacts and, specifically, that:

  > *The proposed project is anticipated to cause existing* [transit] *capacity to be exceeded because the site is located south of Northstar, and additional transit ridership from the project would be added to the peak direction.*

  The DEIR describes exiting transit services on SR 267 in the vicinity of the project site, including average ridership per run for summer and winter conditions. (DEIR, pp. 10-10 – 10-12). However, no meaningful analysis of project-related transit impacts is presented. How many additional transit riders will be generated through development of the proposed project? What will be the specific impact on transit ridership and bus load factors?

The DEIR (p. 10.33) states that:

> *The proposed project would enhance existing transit service on SR 267 with construction of a new bus shelter within the MVWPSP near SR 267.*

In fact, that minimal contribution to the local transit infrastructure will serve as no form of enhancement to existing transit service. It will serve only residents of and visitors to the proposed project. Users of the existing transit service will only be inconvenienced by the addition of the bus shelter, as it will add to travel time along the bus route. Although the DEIR states (without basis) that, ". . . any increase in the travel time of the transit route would be modest," no analysis or estimate of the actual delay is provided. Review of the level of service calculation sheets in DEIR Appendix I reveals that simply making the left turn from northbound SR 267 into the project site will add close to a minute to the transit travel time in certain time periods, as follows:

- Existing + Project – Summer Friday: 55.0 seconds,
- Existing + Project – Winter Sunday: 32.2 seconds,
- Cumulative + Project – Summer Friday: 52.6 seconds,
- Cumulative + Project – Winter Sunday: 62.4 seconds,

These times ignore the time needed for the bus to turn around (as it will need to do), allow passengers to board and disembark, and turn back onto SR 267. Also, as we noted in an earlier comment, the delay of 55.0 seconds referred to here will actually be 225.1 seconds (i.e., 3 minutes, 45 seconds) when the project trip generation estimate is corrected. The other cited delays will also increase.

Beyond the lack of any meaningful analysis of project-related transit demand or the faulty evaluation of the transit system "enhancements" proposed by the project, however, is the fact that the proposed mitigation measures will have absolutely no effect with respect to remedying the transit capacity deficiency identified in the DEIR. Only one form of mitigation will be truly effective in this regard: Provide additional transit service, which requires additional and/or larger transit vehicles running more frequently. Neither payment of an annual fee nor joining a transportation management organization will have any effect in this regard. In fact, membership in the transportation management organization might be counter-productive. To the extent that the transit-promotion activities of the organization result in greater ridership on the part of project residents, the transit capacity deficiency will be exacerbated.

- Cumulative Impact 10-12: Cumulative impacts to transit (DEIR, p. 10-45) – According to the DEIR, this impact "would not be cumulatively considerable," based on the assumed implementation of Mitigation Measures 10-5a and 5b. However, as described above, those measure will have no effect in either reducing transit demand or providing additional transit capacity. Therefore, this conclusion is in error and an effective mitigation measure must be identified.

9. ***Inadequate Consideration of Construction Impacts*** – Construction-related impacts are addressed on DEIR pp. 10-34 – 10-36. Among the conclusions presented there is the determination that a maximum of 464 daily trips will be generated during any phase of construction. Further, up to 231 AM peak-hour trips will be generated (with 212 such trips

during six of the eight construction phases) and up to 174 PM peak-hour trips (with 159 such trips in all but two of the phases). (DEIR Table 10-17, p. 10-35)

We note that the trips in this table are incorrectly labeled as "trips per employee vehicle." We doubt, for example, that each employee vehicle will make 462 daily trips in Phase 2 of the construction process, or 231 AM peak-hour trips during that same phase. It appears that the intent was to indicate that the trips listed in Table 10-17 are only employee trips; no truck trips are included.

The construction period trip generation estimates were based, in part, on an assumed employee vehicle occupancy of 1.3 persons per vehicle. (DEIR Table 10-16, Footnote 3, p. 10-34) No information is provided to support this assumed value, which seems high. Consider, for example, the following information regarding average auto occupancy (see Attachment G):

- For trips to and from work: Average vehicle occupancy = 1.13 (Source: U.S. Department of Transportation, Federal Highway Administration, *Summary of Travel Trends: 2009 National Household Travel Survey*, June 2011.)
- California average vehicle occupancy: 1.103287 (Source: United States Census 2000, as reported by the Center for Urban Transportation Research, University of South Florida, 2010.)
- Recommended by Caltrans for economic analyses: 1.15 (Source: Caltrans, *Life-Cycle Benefit-Cost Analysis Economic Parameters 2012)*

Based on this information, the assumed value of 1.3 persons per vehicle is approximately 15 percent too high. Because construction workers might be unlikely to ride-share, a more reasonable occupancy factor would be 1.15 persons per vehicle, which is the highest of the documented values listed above. In addition, other forms of construction traffic will occur during those peak-hour periods including deliveries of material and equipment, ready-mix trucks, food vendors, inspectors, etc.

The trip generation estimates are further flawed in that they assume that, over the course of an entire day, only two employee trips will be made per vehicle – one in and one out. This obviously ignores the potential that an employee (including supervisors) will ever leave the job site during the day, returning before the end of the work day, thereby resulting in four daily trips for that individual.

In addition, the DEIR assumption of only one haul load per weekday (and, therefore, two haul trips) seems questionable. Is it really possible to construct over 100 residential units and 34,500 SF of commercial space with only one truck load of material per day?

Table 8 presents a modified set of construction-period trip generation estimates. To be consistent with DEIR Table 10-17, it includes only employee trips and also unrealistically assumes that employees will make only two trips per day. However, it assumes that construction employees will have a more realistic vehicle occupancy of 1.15 persons per vehicle.

Comparing the volume of construction period peak-hour traffic to the project trip generation estimate suggests that a detailed traffic analysis for construction conditions is warranted. Specifically, DEIR Table 10-11 (p. 10-23) shows that 165 outbound trips are projected for the weekday PM peak hour. This is 31 fewer outbound PM peak-hour trips than could reasonably be

expected during Phase 2 of the construction period and 14 fewer than during six other phases, as shown in Table 8.

The AM peak-hour estimates of construction-period trips are over 30 percent higher than the PM peak-hour estimates. Of course, the DEIR traffic impact analysis ignored potential AM peak-hour impacts, so it is not possible to compare the construction estimates to the project estimates, although, once again, the need for a detailed analysis of construction period traffic impact is clearly indicated.

Table 8
Modified Construction Trip Generation Estimate[1]

Construction Phase	Construction Employees[3]	Estimated Trip Generation[2]		
		Daily	AM Peak Hour[4]	PM Peak Hour[5]
0	45	78	39	29
1	275	478	239	179
2	300	522	261	196
3	275	478	239	179
4	275	478	239	179
5	275	478	239	179
6	275	478	239	179
7	275	478	239	179

Notes:
1 Employee trips only.
2 Based on employee vehicle occupancy of 1.15 persons/vehicle.
3 Source: DEIR Table 10-16, p. 10-34.
4 Assumes 100 percent of employees arrive during AM peak hour.
5 Assumes 75 percent of employees depart during PM peak hour.

Given the likelihood that peak-hour traffic volumes associated with construction activity will be generally similar to (or even higher than) the volumes associated with the proposed project, it seems reasonable to expect that the impact of those trips on the study area intersections and road segments should be evaluated. Of course, the construction activity will primarily occur on weekdays, when background traffic volumes on the study area road system might be higher than on Sundays. Therefore, the construction traffic analysis should address weekday AM and PM peak hours.

10. ***Inadequate Documentation of Vehicle Miles Traveled (VMT) Estimate*** – Certain of the analysis documented in the DEIR Air Quality (Chapter 11) and Greenhouse Gas Emissions and Climate Change (Chapter 12) analyses are based upon information developed in the course of the Transportation and Circulation analysis.

With regard to the Air Quality analysis, DEIR p. 11-12 states:

> *Mobile source emissions were estimated using . . . an estimate of project-generated vehicle trips and VMT developed as part of the analysis presented in Chapter 10, "Transportation and Circulation."*

The Air Quality section also says (DEIR p. 11-18):

> *Mobile-source emissions of criteria air pollutants and precursors would result from resident and visitor trips, employee commute trips, and other associated vehicle trips (e.g., deliveries of supplies, maintenance vehicles) under the MVWPSP. Table 10-11 in Chapter 10, "Transportation and Circulation," shows the MVWPSP's project trip generation estimates including internal capture reductions. The MVWPSP would generate up to 3,305 daily residential trips and 680 daily commercial and amenity trips . . .*

Similar references are in DEIR Chapter 12 (p. 12-10), Greenhouse Gas Emissions and Climate Change:

> *Operational GHG emissions were estimated using . . . estimates of project-generated vehicle trips and total vehicle miles traveled (VMT) that were developed as part of the analysis presented in Chapter 10, "Transportation and Circulation." Development of the projected number of vehicle trips and VMT generated by the project took into account the internalization of trips because of the onsite commercial uses to be developed as part of the project.*

Careful review of the "Transportation and Circulation" analysis presented in DEIR Chapter 10 reveals virtually no mention of VMT and certainly no documentation of the assumptions and procedures employed in developing any VMT estimates. In fact, a digital search of the chapter reveals only a single reference to VMT or vehicle miles traveled; that reference occurs in the description of the Lake Tahoe Regional Plan and bears no relationship to the specific travel characteristics of the proposed project. Moreover, despite detailed digital searches of all three chapters (Transportation and Circulation, Air Quality, and Greenhouse Gas Emissions and Climate Change), we were unable to find any form of VMT estimate for the proposed project.

Finally, we note that the project's VMT estimate (whatever it is) is inaccurate because of the deficiencies in the trip generation estimates described above, particularly with respect to internal trips at the proposed project. Correcting those errors will result in higher VMT values.

The project's VMT estimates and the process used to derive those values must be explained in greater detail to allow the public to judge the validity of those critical parameters.

CONCLUSION

Our review of the Transportation and Circulation analysis incorporated into the Draft Environmental Impact Report for the proposed Martis Valley West Parcel Specific Plan revealed several issues potentially affecting the validity of the conclusions and recommendations presented in that document. Of particular concern is the failure of the DEIR to identify a significant impact at the intersection of SR 267/Project Access Roadway under Existing Plus Project conditions. Equally concerning are the gross errors in the project trip generation analysis resulting from misapplication of internal trip adjustment factors. Those errors affect not only the validity of the traffic impact analysis, but also the air quality, noise, and greenhouse gas emissions analyses. These issues and the others described above must be addressed prior to approval by Placer County of the proposed project and the related environmental documentation.

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact me at (916) 783-3838.

Sincerely,

MRO ENGINEERS, INC.

Neal K. Liddicoat, P.E.
Traffic Engineering Manager

MRO ENGINEERS

ATTACHMENT A

DEIR Project Trip Generation Estimates
Internal, External and Total Trips

MRO ENGINEERS

Table A-1
DEIR Project Trip Generation Estimates[1]
Weekday Internal, External and Total Trips

Land Use		Size	Internal Capture	Project Trip Estimate		
				Internal	External	Total
Weekday Daily Conditions						
Full-Time Residential	Single-Family Homes	100 DU[2]	10%	95	857	952
	Townhomes	40 DU		23	209	232
			Subtotal	***118***	***1,066***	***1,184***
Part-Time Residential	Single-Family Homes	400 DU	0%	0	1,444	1,444
	Townhomes	160 DU		0	578	578
	Cabins	60 DU		0	217	217
			Subtotal	***0***	***2,239***	***2,239***
Commercial/Retail		34,500 SF[3]	80%	***2,720***	***680***	***3,400***
			TOTAL	**2,838**	**3,985**	**6,823**
Weekday PM Peak-Hour Conditions						
Full-Time Residential	Single-Family Homes	100 DU	10%	10	90	100
	Townhomes	40 DU		2	19	21
			Subtotal	**12**	**109**	**121**
Part-Time Residential	Single-Family Homes	400 DU	0%	0	104	104
	Townhomes	160 DU		0	42	42
	Cabins	60 DU		0	16	16
			Subtotal	**0**	**162**	**162**
Commercial/Retail		34,500 SF	80%	***235***	***59***	***294***
			TOTAL	**247**	**330**	**577**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Dwelling unit.
3 Square feet.

MRO ENGINEERS

Table A-2
DEIR Project Trip Generation Estimates[1]
Sunday Internal, External and Total Trips

Land Use		Size	Internal Capture	Project Trip Estimate		
				Internal	External	Total
Sunday Daily Conditions						
Full-Time Residential	Single-Family Homes	100 DU[2]	10%	86	776	862
	Townhomes	40 DU		20	174	194
			Subtotal	***106***	***950***	***1,056***
Part-Time Residential	Single-Family Homes	400 DU	0%	0	1,172	1,172
	Townhomes	160 DU		0	469	469
	Cabins	60 DU		0	176	176
			Subtotal	***0***	***1,817***	***1,817***
Commercial/Retail		34,500 SF[3]	80%	***696***	***174***	***870***
			TOTAL	**802**	**2,941**	**3,743**
Sunday Peak-Hour Conditions						
Full-Time Residential	Single-Family Homes	100 DU	10%	9	77	86
	Townhomes	40 DU		2	16	18
			Subtotal	***11***	***93***	***104***
Part-Time Residential	Single-Family Homes	400 DU	0%	0	144	144
	Townhomes	160 DU		0	58	58
	Cabins	60 DU		0	22	22
			Subtotal	***0***	***224***	***224***
Commercial/Retail		34,500 SF	80%	***86***	***22***	***108***
			TOTAL	**97**	**339**	**436**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Dwelling unit.
3 Square feet.

MRO ENGINEERS

ATTACHMENT B

Internal Trip Capture Calculations

Analyst NKL
Date 11/25/15

MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY

Name of Dvlpt MARTIS VALLEY
Time Period WEEKDAY DAILY

LAND USE A COMMERCIAL

ITE LU Code
Size 34,500 SF

Exit to External: 1,641
Enter from External: 1,641

	Total	Internal	External
Enter	1,700	59	1,641
Exit	1,700	59	1,641
Total	3,400	118	3,282
%	100%	3%	97%

1,360 — 80% Demand — 59 Balanced — 10% 59 Demand

1,360 — 80% Demand — 59 Balanced — 10% 59 Demand

1,360 — 80% Demand — 0 Balanced — 0% 0 Demand

1,360 — 80% Demand — 0 Balanced — 0% 0 Demand

LAND USE B FULL-TIME RESIDENTIAL

ITE LU Code
Size 140 DU

Exit to External: 533
Enter from External: 533

	Total	Internal	External
Enter	592	59	533
Exit	592	59	533
Total	1,184	118	1,066
%	100%	10%	90%

Demand 10% 59 — Balanced 0 — Demand 0% 0

10% 59 Demand — 0 Balanced — 0% 0 Demand

LAND USE C PART-TIME RESIDENTIAL

ITE LU Code
Size 620 DU

Enter from External: 1,120
Exit to External: 1,120

	Total	Internal	External
Enter	1,120	0	1,120
Exit	1,120	0	1,120
Total	2,240	0	2,240
%	100%	0%	100%

Net External Trips for Multi-Use Development

	LAND USE A	LAND USE B	LAND USE C	TOTAL
Enter	1,641	533	1,120	3,294
Exit	1,641	533	1,120	3,294
Total	3,282	1,066	2,240	6,588
Single-Use Trip Gen. Est.	3,400	1,184	2,240	6,824

Source: Kaku Associates, Inc.

INTERNAL CAPTURE 3%

Analyst NKL
Date 11/25/15

MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY

Name of Dvlpt MARTIS VALLEY
Time Period WEEKDAY PM PEAK HOUR

LAND USE A COMMERCIAL

ITE LU Code
Size 34,500 SF

	Total	Internal	External
Enter	141	4	137
Exit	153	8	145
Total	294	12	282
%	100%	4%	96%

Exit to External: 145
Enter from External: 137

122 — 80% Demand; 8 Balanced; 10% 8 Demand
113 — 80% Demand; 4 Balanced; 10% 4 Demand
122 — 80% Demand; 0 Balanced; 0% 0 Demand
113 — 80% Demand; 0 Balanced; 0% 0 Demand

LAND USE B FULL TIME RESIDENTIAL

ITE LU Code
Size 140 DU

	Total	Internal	External
Enter	77	8	69
Exit	44	4	40
Total	121	12	109
%	100%	10%	90%

Exit to External: 40
Enter from External: 69

Demand 10%; Balanced 0; Demand 0%
Demand 10%; Balanced 0; Demand 0%

LAND USE C PART-TIME RESIDENTIAL

ITE LU Code
Size 620 DU

	Total	Internal	External
Enter	67	0	67
Exit	95	0	95
Total	162	0	162
%	100%	0%	100%

Enter from External: 67
Exit to External: 95

Net External Trips for Multi-Use Development

	LAND USE A	LAND USE B	LAND USE C	TOTAL
Enter	137	69	67	273
Exit	145	40	95	280
Total	282	109	162	553
Single-Use Trip Gen. Est.	294	121	162	577

INTERNAL CAPTURE 4%

Source: Kaku Associates, Inc.

Analyst N/KL
Date 11/25/15

MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY

Name of Dvlpt MARTIS VALLEY
Time Period SUNDAY DAILY

LAND USE A COMMERCIAL

ITE LU Code
Size 34,500 SF

	Total	Internal	External
Enter	435	53	382
Exit	435	53	382
Total	870	106	764
%	100%	12%	88%

Exit to External: 382
Enter from External: 382

348 — 80% Demand — 53 Balanced — 10% 53 Demand

348 — 80% Demand — 53 Balanced — 10% 53 Demand

348 — 80% Demand — 0 Balanced — 0% 0 Demand

348 — 80% Demand — 0 Balanced — 0% 0 Demand

LAND USE B FULL-TIME RESIDENTIAL

ITE LU Code
Size 140 DU

	Total	Internal	External
Enter	528	53	475
Exit	528	53	475
Total	1,056	106	950
%	100%	10%	90%

Exit to External: 475
Enter from External: 475

Demand 10% 53 — Balanced 0 — Demand 0% 0

10% 53 Demand — 0 Balanced — 0% 0 Demand

LAND USE C PART-TIME RESIDENTIAL

ITE LU Code
Size 620 DU

	Total	Internal	External
Enter	909	0	909
Exit	909	0	909
Total	1,818	0	1,818
%	100%	0%	100%

Enter from External: 909
Exit to External: 909

Net External Trips for Multi-Use Development

	LAND USE A	LAND USE B	LAND USE C	TOTAL
Enter	382	475	909	1,766
Exit	382	475	909	1,766
Total	764	950	1,818	3,532
Single-Use Trip Gen. Est.	870	1,056	1,818	3,744

INTERNAL CAPTURE: 6%

Source: Kaku Associates, Inc.

Analyst NKL
Date 11/25/15

MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY

Name of Dvlpt MARTIS VALLEY
Time Period SUNDAY PEAK HOUR

LAND USE A COMMERCIAL

ITE LU Code
Size 34,500 SF

	Total	Internal	External
Enter	53	5	48
Exit	55	6	49
Total	108	11	97
%	100%	10%	90%

Exit to External: 49
Enter from External: 48

	Demand	Balanced	Demand
A → B	44 (80%)	6	6 (10%)
B → A	42 (80%)	5	5 (10%)
A → C	44 (80%)	0	0 (0%)
C → A	42 (80%)	0	0 (0%)

LAND USE B

ITE LU Code
Size 140 DU

	Total	Internal	External
Enter	55	6	49
Exit	49	5	44
Total	104	11	93
%	104	11%	89%

Exit to External: 44
Enter from External: 49

	Demand	Balanced	Demand
B → C	10% 6	0	0% 0
C → B	10% 5	0	0% 0

LAND USE C PART-TIME RESIDENTIAL

ITE LU Code
Size 600 DU

	Total	Internal	External
Enter	103	0	103
Exit	121	0	121
Total	224	0	224
%	100%	0%	100%

Enter from External: 103
Exit to External: 121

Net External Trips for Multi-Use Development

	LAND USE A	LAND USE B	LAND USE C	TOTAL
Enter	48	49	103	200
Exit	49	44	121	214
Total	97	93	224	414
Single-Use Trip Gen. Est.	108	104	224	436

Source: Kaku Associates, Inc.

INTERNAL CAPTURE 5%

MRO ENGINEERS

ATTACHMENT C

Corrected Project Trip Generation Estimates
Internal, External and Total Trips

MRO ENGINEERS

Table C-1
Corrected Project Trip Generation Estimates[1]
Weekday Internal, External and Total Trips

Land Use		Size	Internal Capture	Project Trip Estimate		
				Internal	External	Total
Weekday Daily Conditions						
Full-Time Residential	Single-Family Homes	140 DU[2]	10%	95	857	952
	Townhomes	40 DU		23	209	232
			Subtotal	***118***	***1,066***	***1,184***
Part-Time Residential	Single-Family Homes	400 DU	0%	0	1,444	1,444
	Townhomes	160 DU		0	578	578
	Cabins	60 DU		0	217	217
			Subtotal	***0***	***2,239***	***2,239***
Commercial/Retail		34,500 SF[3]	80%	***118***	***3,282***	***3,400***
			TOTAL	**236**	**6,587**	**6,823**
Weekday PM Peak-Hour Conditions						
Full-Time Residential	Single-Family Homes	100 DU	10%	10	90	100
	Townhomes	40 DU		2	19	21
			Subtotal	**12**	**109**	**121**
Part-Time Residential	Single-Family Homes	400 DU	0%	0	104	104
	Townhomes	160 DU		0	42	42
	Cabins	60 DU		0	16	16
			Subtotal	**0**	**162**	**162**
Commercial/Retail		34,500 SF	80%	***12***	***282***	***294***
			TOTAL	**24**	**553**	**577**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Dwelling unit.
3 Square feet.

MRO ENGINEERS

Table C-2
Corrected Project Trip Generation Estimates[1]
Sunday Internal, External and Total Trips

Land Use		Size	Internal Capture	Project Trip Estimate		
				Internal	External	Total
Sunday Daily Conditions						
Full-Time Residential	Single-Family Homes	100 DU[2]	10%	86	776	862
	Townhomes	40 DU		20	174	194
			Subtotal	***106***	***950***	***1,056***
Part-Time Residential	Single-Family Homes	400 DU	0%	0	1,172	1,172
	Townhomes	160 DU		0	469	469
	Cabins	60 DU		0	176	176
			Subtotal	***0***	***1,817***	***1,817***
Commercial/Retail		34,500 SF[3]	80%	***106***	***764***	***870***
			TOTAL	**212**	**3,531**	**3,743**
Sunday Peak-Hour Conditions						
Full-Time Residential	Single-Family Homes	100 DU	10%	9	77	86
	Townhomes	40 DU		2	16	18
			Subtotal	***11***	***93***	***104***
Part-Time Residential	Single-Family Homes	400 DU	0%	0	144	144
	Townhomes	160 DU		0	58	58
	Cabins	60 DU		0	22	22
			Subtotal	***0***	***224***	***224***
Commercial/Retail		34,500 SF	80%	***11***	***97***	***108***
			TOTAL	**22**	**414**	**436**

Notes:
1 Reference: DEIR, Table 10-11 – Project Trip Generation, p. 10-23.
2 Dwelling unit.
3 Square feet.

MRO ENGINEERS

ATTACHMENT D

Level of Service Calculation
State Route 267/Project Access Roadway
Existing + Project – Summer PM Peak Hour
(Fehr & Peers)

Intersection	
Int Delay, s/veh	5.3

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Vol, veh/h	585	108	57	438	108	57
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	250	250	-	0	250
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	636	117	62	476	117	62

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	636	0	1236	636
Stage 1	-	-	-	-	636	-
Stage 2	-	-	-	-	600	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	947	-	195	478
Stage 1	-	-	-	-	527	-
Stage 2	-	-	-	-	548	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	947	-	182	478
Mov Cap-2 Maneuver	-	-	-	-	182	-
Stage 1	-	-	-	-	527	-
Stage 2	-	-	-	-	512	-

Approach	EB	WB	NB
HCM Control Delay, s	0	1	40.7
HCM LOS			E

Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	182	478	-	-	947	-
HCM Lane V/C Ratio	0.645	0.13	-	-	0.065	-
HCM Control Delay (s)	55	13.7	-	-	9.1	-
HCM Lane LOS	F	B	-	-	A	-
HCM 95th %tile Q(veh)	3.7	0.4	-	-	0.2	-

MRO ENGINEERS

ATTACHMENT E

Corrected Level of Service Calculation
State Route 267/Project Access Roadway
Existing + Project – Summer PM Peak Hour
(MRO Engineers, Inc.)

Intersection	
Int Delay, s/veh	27.5

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Vol, veh/h	585	177	96	438	182	98
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	0	-	0	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	636	192	104	476	198	107

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	636	0	1321	636
Stage 1	-	-	-	-	636	-
Stage 2	-	-	-	-	685	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	947	-	~ 173	478
Stage 1	-	-	-	-	527	-
Stage 2	-	-	-	-	500	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	947	-	~ 154	478
Mov Cap-2 Maneuver	-	-	-	-	~ 154	-
Stage 1	-	-	-	-	527	-
Stage 2	-	-	-	-	445	-

Approach	EB	WB	NB
HCM Control Delay, s	0	1.7	151.5
HCM LOS			F

Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	154	478	-	-	947	-
HCM Lane V/C Ratio	1.285	0.223	-	-	0.11	-
HCM Control Delay (s)	225.1	14.7	-	-	9.3	-
HCM Lane LOS	F	B	-	-	A	-
HCM 95th %tile Q(veh)	11.8	0.8	-	-	0.4	-

Notes

~: Volume exceeds capacity $: Delay exceeds 300s +: Computation Not Defined *: All major volume in platoon

MRO ENGINEERS

ATTACHMENT F

Table 9-15 – Travel Characteristics of Summer Overnight Guests
(Source: Placer County, *Draft Environmental Impact Report – Village at Squaw Valley Specific Plan*, May 2015)

Table 9-15 Travel Characteristics of Summer Overnight Guests

Travel Characteristic		Overnight Guests[1]
Arrival Travel Mode	Auto	85%
	Airplane & Rental Car/ Shuttle	15%
Trip Origin	Truckee / Northstar	0%
	Tahoe North Shore	0%
	Squaw Valley	0%
	Reno/Sparks	10%
	Tahoe West/South Shore	0%
	Sacramento / Central Valley	13%
	Bay Area	38%
	Airports	10%
	Other	29%
Travel Mode for Trips Originating within Olympic Valley[2]	Auto	35%
	Walk	56%
	Bus/Van	5%
Overnight Guest Trips Outside of Squaw Valley	Did not Leave Squaw Valley	22%
	1 to 2 trips	43%
	3 to 4 trips	27%
	5 to 6 trips	5%

Notes: Responses may not sum to 100% due to rounding and/or omission of low percentage responses. "-" = survey topic was not asked to particular group.
[1] Refer to the text of Section 9.1.8, "Winter Season/Summer Season Travel Behavior Characteristics," in this DEIR for data collection source and methods.
[2] Mode choice refers to primary travel mode during stay.
Source: Data provided by Squaw Valley Ski Resort in 2012-2013

The data in these tables reveals several meaningful conclusions for *winter overnight guests/visitors*. As described in Section 9.3.2, "Methods and Assumptions," this group is particularly important in evaluating the proposed project's travel characteristics.

- 100 percent arrived to/from the resort via auto (either private vehicle or rental car).
- Once within Squaw Valley, the majority of trips (68 percent) were made by walking. However, one-quarter of respondents reported using a vehicle.
- The majority (60 percent) of guests checked-out between 9 a.m. and 3 p.m.
- On average, overnight guest groups made 0.93 trips outside of Squaw Valley during their visit (calculated as the weighted average of the last row in Table 9-12). This suggests that 100 guest groups would generate 93 vehicle trips exiting Squaw Valley and 93 vehicle trips entering Squaw Valley during the course of their stay (and not including their primary vacation arrival/departure trip).

To better understand overnight guest/visitor travel patterns, room occupancy, and length of stay data from the Village at Squaw Valley was obtained. Data from the 2009-2010, 2010-2011, and 2011-2012 ski seasons was reviewed to identify several weekends with peak levels of room occupancy. For five peak occupancy, non-holiday weekends, a five-day (Wednesday – Sunday) pattern of room occupancy and length of stay data was prepared. This is shown in Table 9-16.

MRO ENGINEERS

ATTACHMENT G

Average Vehicle Occupancy Data
(Various Sources)

728797.2

SUMMARY OF TRAVEL TRENDS

2009 National Household Travel Survey

U.S. Department of Transportation
Federal Highway Administration

Technical Report Documentation Page

1. Report No.	2. Government Accession No.	3. Recipient's Catalog No.
FHWA-PL-11-022	N/A	N/A

4. Title and Subtitle	5. Report Date
Summary of Travel Trends: 2009 National Household Travel Survey	June 2011
	6. Performing Organization Code 3301
7. Author(s) A. Santos, N. McGuckin, H.Y. Nakamoto, D. Gray, and S. Liss	8. Performing Organization Report No. N/A
9. Performing Organization Name and Address Adella Santos, FHWA NHTS Program Manager Nancy McGuckin and Hikari Yukiko Nakamoto, Travel Behavior Associates Danielle Gray and Susan Liss, Cambridge Systematics	10. Work Unit No. (TRAIS) N/A 11. Contract or Grant No. N/A
12. Sponsoring Agency Name and Address U.S. Department of Transportation Federal Highway Administration 1200 New Jersey, SE Washington, DC 20590	13. Type of Report and Period Covered Trends in travel behavior, 1969-2009 14. Sponsoring Agency Code FHWA/HPPI-30

15. Supplementary Notes

N/A

16. Abstract

The 2009 National Household Travel Survey (NHTS) provides data to characterize daily personal travel patterns across the country. The survey includes demographic data on households, vehicles, people, and detailed information on daily travel by all modes of transportation. NHTS survey data is collected from a sample of households and expanded to provide national estimates of trips and miles of travel by travel mode, trip purpose, and other household attributes. When combined with historical data from the 1969, 1977, 1983, 1990, and 1995 NPTS and the 2001 NHTS, the 2009 NHTS serves as a rich source of detailed travel data over time for users.

This document highlights travel trends and commuting patterns in eight key areas - summary of travel and demographics, household travel, person travel, private vehicle travel, vehicle availability and usage, commute travel patterns, temporal distribution, and special populations.

17. Key Words	18. Distribution Statement
Travel, mode, trip purpose, age, gender, travel demographics, vehicle, commute, and travel data.	No restrictions. This document is available to the public through the National Technical Information Service, Springfield Virginia 22161.

19. Security Classif. (of this report)	20. Security Classif. (of this page)	21. No. of Pages	22. Price
Unclassified	Unclassified	82	N/A

Form DOT F 1700.7 (8-72) Reproduction of completed page authorized

The trend of declining vehicle occupancy may have started to reverse, as overall occupancy shows an increase in 2001 and 2009. In 2009, the rise in occupancy was the result of a significant rise in vehicle occupancy for social and recreational travel – changes in occupancy for other purposes were not noteworthy. The calculated occupancy in this table is miles-weighted, using the reported number of people on the trip and the length of the trip together.

Table 16. Average Vehicle Occupancy for Selected Trip Purpose 1977, 1983, 1990, and 1995 NPTS, and 2001 and 2009 NHTS (Person Miles per Vehicle Mile).

Trip Purpose	1977	1983	1990	1995	2001	2009	95% CI
To or From Work	1.3	1.29	1.14	1.14	1.14	1.13	0.01
Shopping	2.1	1.79	1.71	1.74	1.79	1.78	0.05
Other Family/Personal Errands	2	1.81	1.84	1.78	1.83	1.84	0.04
Social and Recreational	2.4	2.12	2.08	2.04	2.03	2.20	0.06
All Purposes	**1.9**	**1.75**	**1.64**	**1.59**	**1.63**	**1.67**	**0.03**

Note:

- All purposes includes other trip purposes not shown, such as trips to school, church, and work-related business.
- "Other Family/Personal Errands" includes personal business and medical/dental. Please see Appendix A - Glossary for definition.
- NPTS is Nationwide Personal Transportation Survey. CI is Confidence Interval.

State Averages for Private Vehicle Occupancy, Carpool Size and Vehicles Per 100 Workers

State	AVO*	AVO Rank	Vehicles Per 100 Workers*	Vehicles per 100 workers Rank	Carpool size*	Carpool Size Rank
Alabama	1.075889	34	88.6	52	2.201781	26
Alaska	1.114375	4	73.5	4	2.188603	35
Arizona	1.104042	5	81.1	16	2.211664	20
Arkansas	1.089406	16	86.3	45	2.208097	21
California	1.103287	6	78.3	9	2.251069	5
Colorado	1.082456	25	80.7	14	2.192308	30
Connecticut	1.06064	49	84.3	33	2.189418	33
Delaware	1.074122	35	84.4	34	2.189157	34
District of Columbia	1.140305	2	43.3	1	2.241521	10
Florida	1.083558	24	84.7	35	2.207295	22
Georgia	1.096737	10	83.9	29	2.263957	3
Hawaii	1.14505	1	72.4	3	2.232226	13
Idaho	1.081059	27	82.6	25	2.191255	32
Illinois	1.076406	32	78.1	8	2.214854	17
Indiana	1.068718	41	86.8	48	2.179439	40
Iowa	1.069759	38	83.6	27	2.173016	41
Kansas	1.067081	44	86.3	46	2.197311	28
Kentucky	1.079559	28	86.0	41	2.185831	37
Louisiana	1.089309	17	84.2	32	2.230521	14
Maine	1.072451	37	83.8	28	2.170807	43
Maryland	1.085535	19	79.3	13	2.211786	19
Massachusetts	1.061989	48	78.0	7	2.161394	49
Michigan	1.059646	51	87.7	51	2.168021	46
Minnesota	1.068216	42	82.4	23	2.171796	42
Mississippi	1.097553	9	86.2	44	2.244873	9
Missouri	1.073065	36	85.9	40	2.167688	47
Montana	1.081926	26	79.3	12	2.203762	24
Nebraska	1.067484	43	84.8	36	2.192163	31
Nevada	1.098435	8	81.2	17	2.187985	36
New Hampshire	1.060512	50	86.4	47	2.135187	52
New Jersey	1.076022	33	77.7	6	2.248742	8
New Mexico	1.09944	7	82.4	24	2.236739	12
New York	1.083653	22	60.4	2	2.214315	18
North Carolina	1.090995	14	85.6	39	2.249705	6
North Dakota	1.066821	45	82.2	22	2.214994	16
Ohio	1.057298	52	87.1	49	2.152485	50
Oklahoma	1.083559	23	86.0	42	2.192942	29
Oregon	1.084095	21	78.8	10	2.180512	39
Pennsylvania	1.068957	40	81.2	19	2.169765	44
Rhode Island	1.066281	46	84.9	37	2.181111	38
South Carolina	1.091506	13	85.6	38	2.262822	4
South Dakota	1.069361	39	82.1	21	2.205716	23
Tennessee	1.078177	31	87.4	50	2.198793	27
Texas	1.095597	11	84.1	31	2.249642	7
Utah	1.094827	12	81.8	20	2.218122	15
Vermont	1.078954	30	80.7	15	2.147544	51
Virginia	1.084704	20	82.8	26	2.240123	11
Washington	1.088657	18	79.1	11	2.202723	25
West Virginia	1.079254	29	86.1	43	2.163842	48
Wisconsin	1.063711	47	84.1	30	2.168474	45

Avg Vehicle Occupancy

Wyoming	1.090717	15	81.2	18	2.264565	2
Puerto Rico	1.131099	3	76.9	5	2.272042	1

Source: United States Census 2000

* Calculated from Census 2000 information assuming "5 to 6 person carpools" average 5.5 persons per carpool and "7-or-more person carpools" average 7 persons per carpool.

[Home] [Up] [Next]

Copyright ◆ 2010, University of South Florida, 4202 E. Fowler Ave., CUT 100, Tampa, FL 33620-5375
813.974.3120 | 813.974.5168 fax | www.nctr.usf.edu/clearinghouse | Privacy Policy | webmaster

National Center for Transit Research's National TDM and Telework Clearinghouse is located at the Center for Urban Transportation Research at the University of South Florida in Tampa, Florida

CALIFORNIA DEPARTMENT OF
TRANSPORTATION

Life-Cycle Benefit-Cost Analysis Economic Parameters 2012

The Economics Analysis Branch utilizes standard economic valuations for application in benefit-cost analysis. These values are used consistently across the Cal-B/C Framework, which includes the Cal-B/C V5.0 and Cal-B/C Corridor . The values are recommended for use in economic analysis on all modes, including highway, rail and transit projects. The economic values represent statewide averages.

TRAVEL TIME PARAMETERS

Discount Rate	**Percent**
Real* (Inflation Adjusted)	4.0

Value of Time	**Dollars Per Person Hours**
Automobile	$12.50
Truck	$28.70
Auto/Truck Composite (Weighted-Average)	$17.35
Transit (in vehicle)	$12.50
Transit (out of vehicle)	$25.00
Average Vehicle Occupancy Rate	1.15

VEHICLE OPERATING COST PARAMETERS

Average Fuel Price	**Dollars Per Gallon**
Regular Unleaded (auto)	$3.714
Disesel (truck)	$3.941

Fuel Price (excluding taxes)	**Dollars Per Gallon**
Regular Unleaded (auto)	$2.85
Diesel (truck)	$3.15

Non-Fuel Costs	**Dollars Per Mile**
Automobile	$0.303
Truck	$0.418

ACCIDENT COST PARAMETERS

Cost of Highway Accident	**Dollars Per Accident**
Fatal Accident	$4,800,000
Injury Accident	$67,400
Property Damage Only (PDO) Accident	$10,200

PF29

Alexis Ollar, MS & GISP, Executive Director, MAP
Tom Mooers, Executive Director, Sierra Watch
June 7, 2016

PF29-1 The comment introduces an attached letter from Shute, Mihaly & Weinberger on the Final EIR for the MVWPSP. See responses to comments PF29-2 through PF29-38.

The comment expresses concern regarding the evaluation of environmental impacts, including Lake Tahoe clarity, night sky, traffic, wildfire hazard. These are evaluated in the Draft EIR and concerns regarding the sufficiency of environmental evaluation are addressed in the Master Responses and individual responses to comments in the Final EIR. As described therein, the EIR was prepared in compliance with CEQA and provides a thorough evaluation of the project's potential environmental effects for the public and decision makers.

The comment alleges piecemealing with regard to the Brockway Campground Project. Please see Master Response 2 of the Final EIR regarding concerns related to the separate Brockway proposal.

The comment expresses opposition to the project as it is currently proposed. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF29-2 The comment provides introductory remarks regarding submittal of the letter on behalf of MAP and Sierra Watch and incorporation by reference of the letter from Shute, Mihaly & Weinberger on December 18, 2015. Please see response to comments to letter IO41 in the Final EIR.

The comment asserts that the Final EIR did not correct deficiencies and that the EIR should be recirculated. See response to comment PF13-2, above, and Master Response 1 in the Final EIR.

The comment recommends denial of the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF29-3 The comment expresses concern regarding the public review process for the MVWPSP and for cumulative development projects, specifically Squaw Valley and Brockway Campground. MVWPSP, Brockway Campground, and Village at Squaw Valley projects are separate projects for which environmental processes are proceeding independently. Placer County has met and exceeded legally required public review periods for the MVWPSP EIR as described in Chapter 1 of the Final EIR. CEQA requires that responses to agency comments be provided to the commenting agencies at least 10 days prior to final action on the project. After release of the Final EIR, the MVWPSP Project was heard at the May 12, 2016 NTRAC meeting and the Placer County Planning Commission held hearings on the MVWPSP on June 9, 2016 and on July 7, 2016. Both of the Planning Commission meetings took take place at least 30 days following the May 3, 2016 release of the Final EIR, which exceeds the requirements of CEQA.

PF29-4 The comment alleges piecemealing with regard to the Brockway Campground Project. The MVWPSP Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding concerns related to the Brockway proposal.

PF29-5 The comment expresses concern as to the level of evaluation of the MVWPSP in the program EIR. A program EIR is appropriate for a large-scale plan at an early stage, where the lead agency will prepare further analyses later on, as individual projects are proposed that implement the plan. (Pub. Resources Code, Sections 21068.5, 21093(a; State CEQA Guidelines, Sections 15152(a), 15168(b), 15385.) A program-level EIR "need not be as detailed as an EIR on the specific construction projects that might follow." (State CEQA Guidelines, 15146 (b).) Program EIRs are first-tier documents; that is, they are used to consider approval of an overall plan or other program; when subsequent projects are proposed consistent with the approved plan, they are evaluated to determine if the program EIR adequately addressed the impacts and mitigation measures associated with the subsequent project, and whether additional CEQA compliance is necessary. As described in CEQA section 21093 "... tiering is appropriate when it helps the public agency to focus upon the issues ripe for decision at each level of environmental review..." Some details of a large-scale project may not be fully known at the time the project is addressed programmatically. In those instances, a program EIR may address the impacts more broadly, examining the type and extent of impact that may occur, and similarly may provide mitigation that is programmatic in nature. Regarding tiering and program EIRs, please see response to comments IO41-15 and IO41-19 in the Final EIR.

See response to comments PF19-8 through PF19-12 regarding the development agreement and Specific Plan.

With regard to recirculation, see response to comment PF13-2, above, and Master Response 1 in the Final EIR.

PF29-6 The comment asserts that the Final EIR did not correct deficiencies and should be recirculated. See PF13-2, above, and Master Response 1 in the Final EIR.

PF29-7 The comment alleges piecemealing of the Brockway Campground Project. Please see Master Response 2 of the Final EIR regarding concerns related to the separate Brockway proposal. Regarding Footnote 1, as explained in Master Response 2 on page 3-7 of the Final EIR, current regulations under TROA prohibit cross use in and out of the Tahoe Basin, so the water supply for Brockway Campground would by necessity be separate from the supply identified in the WSA for the MVWPSP.

PF29-8 The comment disagrees that the development agreement is a financial document and not necessary to understand the environmental impacts and mitigation measures associated with the project. The Development Agreement vests the development of up to 760 dwelling units and 6.6 acres of commercial development (34,500 square feet of commercial and 22,000 square feet of homeowners' amenities) of development within the 662-acres of the plan area designated for development (see Development Agreement, page 5, Section 2.1, Permitted Uses). The Draft EIR analyzes this level of development, so it does analyze the project as described in the Development Agreement. Further, the Draft EIR analyzes the Specific Plan, which includes Development Standards, Design Guidelines and policies that will guide and direct development, including steps to be taken for review of subsequent projects. This level of analysis is appropriate for a Specific Plan, and Specific Plans typically are accompanied by Development Agreements.

Regarding preservation of the East Parcel, both the MVWPSP and the Development Agreement include mechanisms to ensure that the East Parcel is placed into a conservation easement or acquired by a land trust. Policy OS-2 of the MVWPSP states that the entire East Parcel shall be preserved in perpetuity through the use of a limited conservation easement and/or acquisition by a land trust. Section 3.11 of the DA states that the sale of the East

Parcel shall occur on or before December 31, 2020, and that if such a sale does not occur, then the East Parcel shall be placed in a conservation easement that permanently prohibits commercial and/or residential development of the East Parcel within 90 days of January 1, 2021. No action that would be inconsistent with permanent preservation of the East Parcel would be allowed to occur.

PF29-9 The comment states that the EIR continues to improperly rely on conservation of the East Parcel to claim the project will have less-than-significant biological impacts. This is not correct. The comment specifically disagrees with the EIR's rationale and approach for concluding that impacts to northern goshawk and California spotted owl would be less than significant.

Please refer to response to comment I041-13 in the Final EIR. The details of that response still apply to comment PF29-9. The primary focus of the analysis is, appropriately, the extent to which the project would disturb biological resources on the West Parcel. The analysis clearly describes and quantifies the full impact of project implementation; it does not claim that the full, net quantity would somehow be less than the amount directly affected on the West Parcel (up to 169 acres) through conservation of the East Parcel. Page 7-54 of the Draft EIR states, "*Overall, implementation of the MVWPSP could result in the permanent loss or disturbance of up to 169 acres of suitable foraging habitat for northern goshawk and spotted owl on the West Parcel. This total amount of potential habitat loss or disturbance represents a small proportion of the total amount available for northern goshawk and spotted owl in the vicinity of the project site; and these habitats are relatively abundant in the Truckee Tahoe region. Additionally, no spotted owl or goshawk nest sites are known or expected to occur within areas where potential habitat would be permanently removed*."

The analysis concludes that implementation of the MVWPSP, which would include a total/net loss of up to 169 acres of foraging habitat, would not substantially affect the distribution, breeding productivity, viability, or the regional population of northern goshawk and California spotted owl; this was the basis of concluding that impacts on northern goshawk and spotted owl would be less than significant. The EIR addresses whether the project would result in significant impacts to these species in light of the applicable significance threshold. The type of foraging habitat that would be affected on the West Parcel is not known to be limiting to the viability of these species in the Truckee-Tahoe region. Importantly, in its quantification of impacts, the analysis discloses the actual acreage of potential foraging habitat lost on the West Parcel, not what would be lost minus that preserved on the East Parcel. The additional language about benefits of conserving the East Parcel over the long term was intended to point out that not developing that portion of the full plan area, and instead developing the West Parcel, avoids removing high-quality habitat for northern goshawk and spotted owl that is most biologically valuable and known to be limiting to the distribution and reproductive success of these species.

With regard to use of the term "offset," in this case, the intent is to fairly disclose a functional benefit to habitat availability over the long term by conserving high-quality habitat on the East Parcel. However, the conclusion is not that the project-level impact would be significant without conservation of the East Parcel. Impacts on biological resources on the West Parcel are not treated as being "mitigated" by benefits of preserving the East Parcel; the impacts to habitat on the West Parcel are not considered substantial enough to reach the threshold of significance, even before considering the benefits achieved through conservation of the East Parcel, for the biological reasons discussed previously.

PF29-10 The comment states that the Final EIR fails to correct the Draft EIR's "inadequate analysis" of the project's impacts on special-status plant species. Specifically, the comment asserts that the analysis improperly defers evaluation of the project's impacts on special-status

plants, and that the County failed to survey for those species and describe their presence in the project area. Please refer to response to comment IO41-15 in the Final EIR. The details of that response include discussion of why the potential for occurrence of special-status species is presented adequately, and why the analysis of special-status plants and the recommended mitigation measure are not deferred. Additionally, CEQA does not specify the type or intensity of biological surveys required or considered appropriate to support certification of an EIR for a given project, for either project- or program-level environmental review. It is well within acceptable standards for environmental review (and not uncommon) to assume presence or potential presence of a species based on a thorough habitat assessment and without detailed survey data, if the analysis discloses that project implementation could significantly affect the species and recommended mitigation includes performance standards and other applicable requirements.

PF29-11 The comment states that the EIR's cumulative impacts analysis remains inadequate, citing that the recommended mitigation for construction-related impacts to three special-status bird species (olive-sided flycatcher, yellow warbler, and long-eared owl) (Mitigation Measure 7-4) does not address operational effects of the project that may contribute to a cumulative impact. As described in response to comment IO41-16 in the Final EIR, although potential operational-related disturbances to nesting special-status birds were considered and could contribute incrementally to the overall project-level effect, they would not be individually substantial beyond the initial temporary impact of vegetation removal and potential loss of nests during project construction; this potential effect would be minor in both a project-level and cumulative context. To further clarify, the potential long-term operational effects of the project on special-status bird species, when combined with the cumulative projects, would not be cumulatively considerable. The Draft EIR describes that operations and maintenance activities could result in noise, dust, and other disturbances to nesting birds in the vicinity, and potentially result in nest abandonment and mortality to eggs and chicks. However, such potential effects would not occur regularly. In most cases, special-status birds sensitive to such types of disturbances are expected to avoid nesting in areas regularly disturbed by project operations.

PF29-12 The comment reiterates concern regarding visual impacts and mitigation. See responses to comments provided in letter IO41 in the Final EIR. See also Master Response 4 in the Final EIR regarding the visual impact analysis methodology.

PF29-13 The comment states that the Final EIR lacks the necessary evidentiary support for its conclusion that the project would not have a substantial adverse effect on a scenic vista. The Tahoe Rim Trail was originally selected as a vantage point for photosimulations. Square One identified six points along the trail that were closest to the project site and that had the thinnest tree cover. At these points, the topography crested so that the project was obscured from the Trail by topography. This was verified by 3D modeling tests from these points. Additionally, the Trail and project structures would be separated by 500 or more feet of forest.

The Draft and Final EIRs provide evidence that the effect on views from the Tahoe Rim Trail would not be significant, either from the portions of the trail closest to the site (see above), or those points on the trail from which the project site is visible in the distance (see response to comment IO18-52, including Exhibits F3-9 through F3-12 of the Final EIR). Contrary to the comment, Exhibit 3-3 of the Draft EIR shows that the TRT is not immediately adjacent to the MVWP plan area; therefore, the development area shown in Exhibit 3-7 is not adjacent to the TRT. As stated in IO18-52, the MVWPSP site is visible from the Tahoe Rim Trail at long distances only (over 10 miles), and at these distances it would be difficult to perceive project buildings, particularly with the screening provided by trees. At this distance, photosimulations

would not provide substantial additional information because the project site and its development would be so small relative to the surrounding viewshed.

For a discussion of views from the segment of the TRT closest to the MVWPSP site, please see Response to Comment I045-3 in the Final EIR.

PF29-14 Regarding Figure 9-34, see response to comment I041-26, which explains a technical error in the Draft EIR.

The methodology used to prepare the photosimulations is described in detail on pages 3-13 and 3-14 of the Final EIR. The comment does not indicate what additional information would be needed to understand the methodology. The photosimulations were peer reviewed by the County's environmental consultant, who concluded that the photosimulations were reasonable representations of the MVWPSP.

For discussions of nighttime light baseline, increase in lighting in terms of spectrum, shielding and lighting and establishing appropriate significance thresholds, please see responses to comments 29-15, 29-16, and 29-17, below.

PF29-15 The comment states that the EIR fails to establish a baseline for assessing the quality of dark skies. In fact, baseline is established through photographs of the existing conditions, which represent the experience of night-time lighting conditions to a viewer (see, for example, Exhibit 9-6 of the Draft EIR). The average viewer does not have a sense of what a particular wattage looks like, or a given number of lumens looks like. Such a definition would be meaningless without context.

PF29-16 The comment states that the EIR fails to quantify the project's lighting and to evaluate the effect that lighting would have on the night sky. There is no requirement to quantify all impacts in CEQA. As indicated in the comment, there are various ways to describe and evaluate the light-related effects of a project. The MVWPSP EIR uses photosimulations, which provide a clear comparison of "with" and "without" project conditions. Square One produced night-time photosimulations based on night-time photography, detailed 3D modeling of the project site, and comparisons to nearby 'in-kind' residential projects (see pages 3-13 and 3-14 of the Final EIR for more detail).

The comment suggests that a study using lumens per acre instead would be more accurate or appropriate. The photosimulations used 3D modeling to account for terrain and tree coverage. Lumens-per-acre does not take into account either of these, and can be therefore misleading. Additionally, the types of fixtures, dictated by regulation, has more influence on the impacts of light than lumens/acre. Thus, an "in-kind" example offers a truer comparison of lighting conditions than lumens per acre. Regarding views from the TRT, please see Response to Comment PF29-13.

Night-time photosimulations were prepared from three vantage points. The letter inquires as to why three were prepared, rather than the 44 vantage points that were originally identified for study. Nighttime simulations were from vantage points that were either sensitive or from which the project might be visible at night. Night-time simulations were not prepared for vantage points from which the project is completely obscured by terrain, since the terrain that obscures the structure of the project will also obscure light coming from the interior of structures of the project.

PF29-17 The comment asserts that the EIR fails to include thresholds of significance for nighttime views, asserting that a quantifiable threshold is necessary. Please see Section 9.4.1, Significance Criteria, in Chapter 19 of the Draft EIR, which establishes the significance

criteria utilized for evaluation of impacts on scenic or aesthetic resources. Placer County does not have numeric significance criteria for nighttime views. Note that CEQA does not require that numerical thresholds be used to assess the significance of an impact.

PF29-18 The comment asserts that the Draft EIR does not adequately analyze cumulative impacts on nighttime views. As explained in responses to comments provided in letter I041 in the Final EIR (see I041-19 through I041-28, the Draft EIR adequately evaluates the project and cumulative impacts to nighttime views and discusses the measures included in the MVWPSP to limit light sources and minimize impacts to nighttime views. As discussed, no additional mitigation is feasible.

PF29-19 The comment asserts that the Draft EIR does not adequately mitigate the project's night sky impacts. However, as addressed in letter I041 in the Final EIR, the Draft EIR adequately evaluates the project and cumulative impacts to nighttime views and discusses the measures included in the MVWPSP to limit light sources and minimize impacts to nighttime views. Please see responses to comments I041-26 and I041-27. Regarding Appendix B of the MVWPSP, Section N. Lighting, the measures to be considered use "shall", and therefore are not optional. For example, Item n.vi states that "Exterior lighting fixtures shall be installed and shielded in such a manner that no light rays are emitted from the fixture at angles above the horizontal plane". As discussed in Response to Comment 1041-27, because the MVWPSP already includes requirements that would limit light sources to the minimum amount necessary to maintain nighttime safety, utility, security and productivity, no additional mitigation for the MVWPSP is feasible.

PF29-20 The comment states that the Final EIR fails to respond to the comments addressed in the Draft EIR. See responses to comments PF29-21 through PF20-30. In addition, the following information responds to the MRO letter dated June 1, 2016, which was provided as Exhibit 3 in the PF 29 letter.

Responses to MRO Letter dated June 1, 2016

Item 1 – Incorrect Trip Generation Estimate

Please see responses to comments PF91-21 through -24.

Item 2 – Failure to Identify Significant Intersection Impact

Please see response to comment PF29-25.

Item 3 – Incomplete Set of Peak-Hour Analysis Scenarios
The Draft EIR traffic study analyzed project impacts during summer Friday PM peak hour conditions and during winter Sunday PM peak hour conditions. The commenter states that the traffic study should have also analyzed summer Sunday PM peak hour and winter Friday PM peak hour conditions.

For other EIR's in eastern Placer County, the traffic studies have analyzed the two peak hour conditions described above; therefore, the Draft EIR traffic study is consistent with County practice on other environmental documents. Also, for summer conditions, actual traffic count data demonstrates that Friday PM peak hour traffic volumes are higher than Sunday PM peak hour traffic volumes (see *General Plan Study of the 2025 Town of Truckee General Plan EIR*). Similarly, winter volumes tend to be higher on Sunday PM peak hour (when skiers leave the resorts and head to the valley) than on the Friday PM peak hour.

Item 4 – Failure to Analyze Project Impacts on the Interstate 80 Freeway

The commenter states that the distribution of project traffic should be more similar to the distribution of traffic reported for the Village at Squaw Valley DEIR because "although the two projects are not identical, they are sufficiently similar so that the project distribution parameters should not vary substantially." In actuality, the two projects are not "sufficiently similar". The Village at Squaw Valley is a destination resort intended to attract visitors from all over the country. The MVWSP project is primarily a full-time and part-time residential community.

Regarding Interstate 80, the Draft EIR traffic study analyzed all of the facilities requested to be analyzed by Caltrans. Note that Caltrans did not have any comments regarding the analysis of Interstate 80. Regarding the 0.05 increase as a significant impact, it is Placer County's decision as to the significance thresholds to be used for EIRs under their purview. Regarding the analysis of the SR 267/I-80 ramps, the analysis methodology employed in the Draft EIR traffic study were in direct response to Caltrans' request.

Item 5 – Cumulative Conditions Traffic Volume Estimates and Analysis

The commenter questions the use of the Town of Truckee traffic model for use in developing cumulative no project traffic forecasts. Please refer to the response to Comment PF29-29.

Item 6 – Safety-Related Impacts

With regards to the design of the SR 267/Project Access intersection, Placer County staff met with Caltrans staff to discuss this issue. At this meeting, Caltrans stated that they would not support the installation of a roundabout at this location due to grade, and that they would not support the installation of a traffic signal due to rear-end accident concerns. Caltrans indicated they would support the installation of a non-signalized intersection provided that the intersection was designed and constructed to their standards. This would include all geometric details including lane configurations, lane taper lengths, and acceleration and deceleration lengths.

Item 7 – Emergency Vehicle Access

Please see response to comment PF29-28.

Item 8 – Deficient Mitigation Measures

The commenter states "generally speaking, traffic signals in the State of California respond directly to traffic demand, automatically adjusting the amount of time allocated to any particular movement… Consequently, a mitigation measure calling for signal optimization might have little or no effect." While the commenter statement of generalities may or may not be correct, the facts, as borne out in the technical calculations contained in the Draft EIR demonstrate that the traffic signals in the Draft EIR traffic study are not optimized, and optimization of the signal timing would improve traffic flow and reduce travel delay at the intersections in question.

The commenter questions the effectiveness of signage on Highlands View Drive because 75 vehicles currently make the left-turn from Highlands View Road to SR 267 during the winter peak hour. The purpose and benefit of the signage is to inform motorists wishing to head north on SR 267 that a shorter and faster route exists and, by using that alternative route, they will be able to enter SR 267 via a traffic signal. Note that those 75 drivers mentioned above are very likely unaware of the option to use the faster route with the traffic signal, or

may not be aware of the level of queueing and delay for vehicles trying to turn left onto SR 267.

Regarding the comment concerning transit and Mitigation Measure 10-5a, the specific amount of fees that the project would pay for capital improvement programs and ongoing transit services would be established through a new Zone of Benefit under a County Service Area. Before the new Zone of Benefit is formalized, the County would define the specific transit operating and capital improvements to be funded through the CSA. An engineer's report would be prepared for the Zone of Benefit that would include anticipated transit demand generated by subsequent phases of the MVWPSP.

Regarding Mitigation Measure 10-5b, membership in the TNT/TMA is a standard mitigation measure for large projects in eastern Placer County. By joining and maintaining membership in the TNT/TMA, the project would provide funding that would be used towards enhanced transit and other forms of multi-modal transportation, thus reducing reliance on automobile use.

Implementation of a shuttle with the construction of the 340th residential unit of the Project is intended to provide residents with an alternative to using their vehicles for local trips.

All of the mitigation measures discussed above are intended to reduce the amount of vehicular traffic generated by the project, thereby reducing traffic impacts of the projects, albeit not to the level that would result in less-than-significant project impacts on road segments and intersections discussed in the Draft EIR traffic impact study.

Item 9 - Inadequate Consideration of Construction Impacts

The commenter suggests that the construction impacts analysis is flawed because it used a vehicle occupancy rate of 1.3 persons per vehicle rather than a national average of 1.15 persons per vehicle. The County disagrees with the commenter's assertion that national data take precedence over local, actual data. Most professional traffic engineers agree that the use of local data, if available, is preferable over national data.

The commenter, using the higher vehicle occupancy rate of 1.3 persons per vehicle, projects peak hour volumes will be similar to (or even higher than) the volumes associated with the proposed project. However, using the 1.15 factor that should be used, the peak hour construction traffic is less than the project traffic; therefore, further analysis of construction impacts is not warranted.

Item 10 – Inadequate Documentation of Vehicle Miles of Travel (VMT) Estimate

The commenter states that the project's VMT estimate is inaccurate because of deficiencies in the trip generation estimates of the project. Please see response to comments PF29-21 through 24 that demonstrates that the project trip generation estimate used in the Draft EIR traffic study was accurate, and if anything, may have overestimated project trip generation.

PF29-21 The comment states that the trip generation estimate for the proposed project contained errors, which have the effect of substantially understating the volume of traffic associated with the project. The commenter presents four reasons for this assertion in subsequent comments.

Before addressing each specific issue, it is valuable to introduce a comparison of trip generation rates from actual count data at Tahoe Donner (a nearby community with similar land uses) to the trip generation assumed for the MVWPSP.

When the Town of Truckee updated its General Plan, a comprehensive trip generation analysis of several neighborhoods in the community was prepared. As shown in Appendix A: General Plan Traffic Study of the 2025 Town of Truckee General Plan EIR, extensive hourly traffic counts were performed over several weeks in the month of August, when traffic volumes are the highest. One of those subdivisions is Tahoe Donner, which at the time of the counts consisted of 5,020 residential units (both full-time and part-time) as well as recreational and commercial uses serving the local neighborhood (i.e. recreational center, golf course, restaurant, convenience market).

Roadway counts at the two entrances to the development were collected for an entire week in August (Tuesday 8/12/03 to Monday 8/18/03). Analysis of those traffic counts revealed that that peak day of the week was Friday 8/15 when 17,484 vehicles used the roads serving the subdivision. The peak hour of the week occurred on that same Friday afternoon from 4:30 PM – 5:30 PM, when 1,432 vehicles were counted on the two roads. By dividing the traffic counts by the number of units, the traffic generation of Tahoe Donner during the peak summer season was computed. The results showed a summer peak daily trip generation rate of 3.48 external trips per dwelling unit, and a summer peak hour trip generation rate of 0.29 trips per dwelling unit.

The MVWSP project would consist of 760 dwelling units with supporting commercial amenities to serve the residents. As shown in Table 10-11 of the Draft EIR traffic study, the analysis estimated that the MVWSP project would generate 3,985 external daily trips over a summer Friday, and 330 external peak hour trips on that Friday. This results in a summer Friday external daily trip rate of 5.24 trips per dwelling unit, and a summer Friday peak hour trip rate of 0.43 trips per dwelling unit.

Trip Rate Comparison

	Tahoe Donner	MVWPSP	Difference
Summer Daily Trip Rate	3.48	5.24	+51 percent
Summer Peak Hour Trip Rate	0.29	0.43	+48 percent

The external trips estimated for the MVWPSP are about 50 percent higher than what would be generated following the trip rates from local count data. Some comments on the MVRSP traffic study question the computation of the project's trip generation estimate, but the trip rates used are much higher than actual rates of nearby subdivisions, and the traffic impact and mitigation analysis resulting from use of those rates is considered to be conservative.

PF29-22 The comment states that traffic study overestimates the number of internal trips generated by the project's commercial space, and that the study underestimates the number of external trips that the project will generate.

As explained in response to comment PF29-21, the commercial trip generation rates used in the analysis are higher than what would be expected for the project commercial uses. The commercial trip rates are based on suburban shopping centers, and the commercial uses in the project are intended to be community-based amenities.

For part-time residential, the ITE trip generation description notes that internalization has already been accounted for in the trip rate; therefore, what is initially calculated are the external trips. This does not equate to total trips, because internalization between the part-time residential and commercial does occur. The comment incorrectly infers that internalization between the part-time residential and commercial does not exist.

The primary purpose of the traffic study is to determine the external trip generation of the project and the traffic impact those trips would have on public roads and intersections in the study area. Therefore, the traffic study did not focus on internal trips. However, for purposes of responding to the comment, the following tables to show that the number of internal trips associated with the commercial and amenities land uses are equal to the internalization of the total residential land uses, both full-time and part time. They also detail the trip generation of the project with the balanced internalization between commercial and residential land uses. The commercial uses within the MVWPSP are intended to serve the needs of onsite residents and guests, as indicated by Appendix A, "Allowable Uses," of the MVWPSP. No restriction on outside use would be needed, because any such use would be incidental.

Project Trip Generation – Weekday Internal, External, and Total Trips

Land Use		Size [1]	Internal Capture %	Project Trips		
				Internal	External	Total
Weekday Daily Conditions						
Full-Time Residential	Single-Family Homes	100 du	10%	95	857	952
	Townhomes	40 du		23	209	232
			Subtotal	*118*	*1,066*	*1,184*
Part-Time Residential	Single-Family Homes	400 du	54%	1,679	1,444	3,123
	Townhomes	160 du		671	578	1,249
	Cabins	60 du		252	217	469
			Subtotal	*2,602*	*2,238*	*4,841*
Commercial	Shopping Center (820)	34.5 ksf	80%	*2,720*	*680*	*3,400*
			TOTAL	5,444	3,984	9,425
Weekday PM Peak-Hour Conditions						
Full-Time Residential	Single-Family Homes	100 du	10%	10	90	100
	Townhomes	40 du		2	19	21
			Subtotal	*12*	*109*	*121*
Part-Time Residential	Single-Family Homes	400 du	58%	143	104	247
	Townhomes	160 du		58	42	100
	Cabins	60 du		22	16	38
			Subtotal	*223*	*162*	*385*
Commercial	Shopping Center (820)	34.5 ksf	80%	*235*	*59*	*294*
			TOTAL	470	330	800

Notes: [1] du = dwelling units, ksf = 1,000 square feet

Project Trip Generation – Sunday Internal, External, and Total Trips

Land Use		Size [1]	Internal Capture %	Project Trips		
				Internal	External	Total
Sunday Daily Conditions						
Full-Time Residential	Single-Family Homes	100 du	10%	82	738	820
	Townhomes	40 du		19	175	194
			Subtotal	*101*	*912*	*1,041*
Part-Time Residential	Single-Family Homes	400 du	25%	384	1,172	1,156
	Townhomes	160 du		154	469	623

Project Trip Generation – Sunday Internal, External, and Total Trips						
Land Use		Size [1]	Internal Capture %	Project Trips		
				Internal	External	Total
	Cabins	60 du		58	176	234
			Subtotal	*596*	*1,817*	*2,413*
Commercial	Shopping Center (820)	34.5 ksf	80%	*697*	*174*	*871*
			TOTAL	1,394	2,903	4,325
Sunday PM Peak-Hour Conditions						
Full-Time Residential	Single-Family Homes	100 du	10%	8	78	86
	Townhomes	40 du		2	16	18
			Subtotal	*10*	*94*	*104*
Part-Time Residential	Single-Family Homes	400 du	25%	49	143	192
	Townhomes	160 du		20	58	78
	Cabins	60 du		7	22	29
			Subtotal	*76*	*223*	*299*
Commercial	Shopping Center (820)	34.5 ksf	80%	*86*	*22*	*108*
			TOTAL	172	339	512

Notes: [1] du = dwelling units, ksf = 1,000 square feet

PF29-23 The comment states that the traffic study treated the commercial/retail space as a single unit and that distributing the commercial/retail space throughout the project site would have yielded more traffic generation.

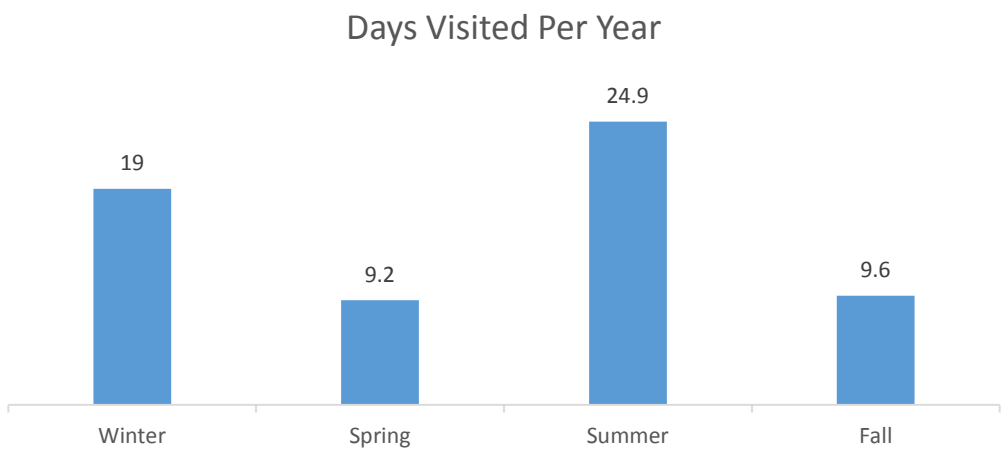
The commercial development would consist of homeowner amenities, services, and community-supporting retail, such as small restaurants or cafes, recreational amenities, a sundries shop, family entertainment, concierge services, and meeting rooms. These uses would be designed to support project residents rather than attract an outside population.

The ITE land use category for Shopping Center (ITE code 820) are based on data from mostly suburban shopping centers that would serve a larger market than a stand-alone subdivision. This is further supported by the response to comment PF29-21 of the comparison of local data from a similar development at Tahoe Donner. The commercial development is intended to serve the neighborhood residents rather than serve a larger market, as actual traffic count data reflects this conclusion.

PF29-24 The comment states that winter traffic volumes in the study area are higher than summer volumes, and that the study should have used different trip generation rates for project land uses for winter and summer conditions.

Caltrans data show that traffic volumes in the study area are higher during the summer than during the winter. Traffic counts derived from the State Route 267 Traffic Census Station located near Northstar Drive show the following: the average daily traffic (ADT) on SR 267 for the month of January, 2012 was 10,267. The ADT in July, 2012 was 13,121. The July ADT was 28 percent higher than the winter ADT. Despite this, it is important to note that project land uses, which are primarily residential, do not inherently have seasonal differences in the trip generation. What does differ are the seasonal trip generation differences for nearby destinations, such as Northstar ski resort attracting more trips during the winter and Lake Tahoe attracting more trips during the summer. This is reflected in the different trip distribution between summer and winter for the project.

Data indicating the amount of time residents tend to visit residential developments is also instructive. Data collected for the Tahoe Donner 20-Year Plan Owner Research on Investment Priorities by F'inn Group, which surveyed of 1,447 Tahoe Donner households in 2015, a similar nearby residential development, and found that their residents on average spent more days visiting their home during the summer (24.9 days) than during the winter (19.0 days).



D4 Survey Question: How many days do you estimate you and your family spend in Tahoe Donner in a typical year?

PF29-25 The comment suggests that, had the traffic study used the trip generation numbers as determined by the commenter, then the analysis would have revealed a significant impact at the SR 267/Project Access Roadway intersection.

As explained in responses to comments PF29-21 through PF29-24, the trip generation rates used in the study are appropriate and justified by the data. Therefore, the commenter's assertion regarding a significant project impact at the SR 267/Project Access Roadway intersection is unfounded.

PF29-26 The comment states that the Draft EIR did not include analysis of the freeway ramps. This is not correct. The analysis of I-80 freeway ramp merge and diverge segments include analysis of the entering mainline, the merge and diverge areas where the ramp intersects with freeway lanes, and the ramp roadway. The level of service (LOS) reported for the overall segment is based on the density. The ramp roadway calculation is included in the analysis; if the ramp roadway volume exceeds capacity, then the merge or diverge segment is reported as LOS F and density is not reported. Under no scenarios reported did the ramp roadways exceed capacity, therefore, the density and LOS for the merge and diverge segments were calculated and noted in the Draft EIR. Please also see response to comment IO18-13 in the Final EIR.

The comment states that the VMT estimate contained in the Draft EIR is inaccurate because of significant deficiencies in trip generation estimates, and that correcting those values would results in higher VMT values.

Please see responses to responses to comments PF29-21 through PF29-24. The trip generation estimate of the project as contained in the Draft EIR has been valid and justified, and if anything, it may somewhat overestimate project traffic generation. Thus, the commenter's assertion is without merit.

PF29-27 The comment states that the acceleration lanes proposed at the project access intersection are grossly under-designed and will, therefore, create the potential for conflicts with vehicles on SR 267. Intersections by definition introduce the potential for conflicts between through traffic and cross-traffic. Intersections with State highways, such as SR 267, must be designed to Caltrans standards, which are intended to minimize potential conflicts and ensure adequate operation. Caltrans will not approve a new intersection unless it is deemed safe for public use. The project access/SR 267 intersection design must be approved by Caltrans.

The MVWP access intersection with SR 267 would include separate lanes for turning movements, acceleration, deceleration, and refuge in order to minimize the potential for conflicts with traffic traveling on SR 267. As shown on Exhibit 3-10 of the Draft EIR, a median refuge area is proposed for drivers making a left turn from the site onto SR 267 northbound. A median refuge is recommended by Caltrans staff for this intersection, rather than a full acceleration lane. The refuge lane provides approximately 220 feet of storage length, which exceeds the Caltrans standard for a typical median refuge by approximately 20 feet. The refuge lane would be intended to encourage drivers making a left turn from the site to wait for a gap in downhill traffic, instead of merging at high speed when there may not be an adequate gap. The southbound acceleration lane would be designed to meet Caltrans safety standards in order to reduce the potential for drivers turning right from the site to disrupt the flow of through traffic on SR 267.

The sight lines at the intersection have been reviewed by Placer County and Caltrans in the field and have been deemed appropriate. The MVWPSP access intersection would have sight lines of 4,500+/- feet, which is over ¾ mile. The grade at the proposed access intersection is 6.5 percent, which is not uncommon for intersections on mountain roads.

Caltrans is aware of the proposed MVWPSP project, including the proposed access intersection. A preliminary design of the MVWPSP access intersection was reviewed by Caltrans, and initial Caltrans comments were incorporated into the current intersection design. Caltrans has also attended several meetings regarding the MVWPSP that included the project engineer, County staff, and the County's transportation consultant. A Caltrans Inspector has participated in a site visit. County staff, the County's transportation consultant, and LSC Transportation Consultants (the applicant's traffic consultant) also reviewed the intersection design to ensure it was consistent with the EIR Traffic Study.

The proposed MVWPSP access design would be similar to, or better (from a safety perspective) than, many intersections in the Truckee/Tahoe area. For example, the North National Avenue/SR 267 intersection has sight lines of 1,500 feet and a 7.5 percent grade. The Kingswood Drive/Commonwealth Drive intersection with SR 267 is at a 7.5 percent grade. Further, a number of intersections along SR 267 do not include both acceleration and deceleration lanes.

The MVWPSP access intersection has also been designed to be compatible with future Caltrans SR 267 improvements.

Regarding how access would be maintained during the winter, both SR 267 and the project access road would be plowed.

Regarding the closure of Highlands View Drive, the intersection is closed only during heavy snow/chain control periods and has a grade of approximately 6.5 percent (ranging from 0 percent to 8.5 percent), similar to the MVWPSP access grade.

PF29-28 The comment requests an evaluation of the project with respect to emergency access and the ability of first responders to meet the needs of the general public, both internal and external to the project.

Response times are addressed in Impact 17-3, based on the analysis provided in the 2015 Citygate Associates report prepared for the NCSD. The Citygate report found that response times to the MVWP would be acceptable (Citygate, page 6). Related, initially the MVWP proposed an only seasonal EVA connecting to the Fibreboard Freeway. However, in response to local fire districts' requests, the MVWP committed to a year-round EVA on MVWP property connecting directly to SR 267.

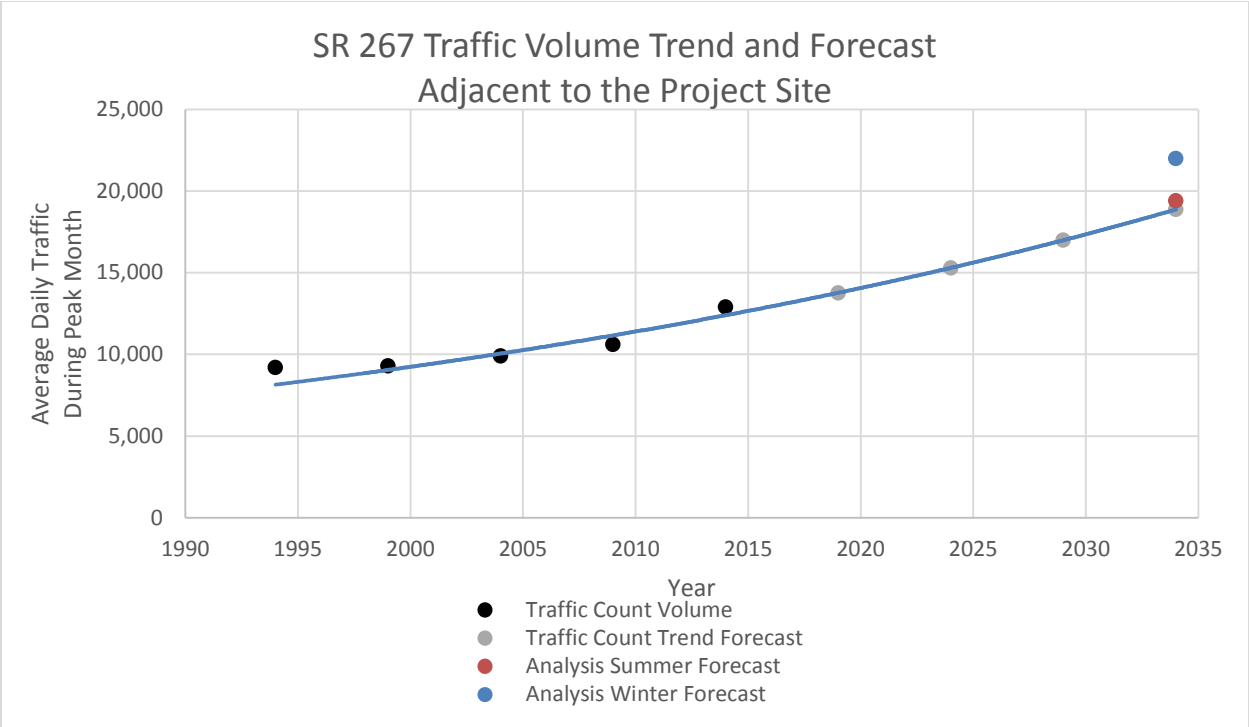
Because the MVWPSP would be annexed into the NCSD for provision of fire protection services, the MVWPSP must comply with all NCSD ordinances, including those related to fire and emergency access. In addition, Section 4.2.2 of the EPEP sets forth standards for the primary access road, and requires that the NFD review the final design for the primary EVA.

Regarding the Fire Protection Plan, it has been prepared and is incorporated into the MVWPSP EPEP, which was prepared in May 2016, and included in staff report for the June 9 Planning Commission meeting.

The evacuation time analysis does not state that it would take 1.5 hours to reach SR 267. Rather, it calculates the amount of time it would take for all occupants of the MVWP area to reach the area around the Truckee Tahoe Airport, where there are sufficient parking areas to park all evacuating vehicles without impinging on travel lanes (LSC, April 26, 2016, page 2, third bullet).

PF29-29 The comment alleges deficiency in the cumulative traffic analysis because cumulative traffic forecasts are for year 2025 instead of year 2034, as noted in the EIR. This is incorrect. In fact, the Truckee Model is not tied to a specific year, as it is not based on any study of development rates in Truckee (and Martis Valley) and the absorption of buildout that can occur by a specific year, nor is it based on some extrapolation of historic development rates to a specific year. Instead, it assumes full buildout of all development capacity identified in the Truckee General Plan and the Martis Valley Specific Plan (adjusted for reductions in actual development on specific parcels compared with zoning capacity that has occurred since adoption of the MVSP and Truckee General Plan). In reality, at historic rates, buildout will not occur for many decades, particularly for the commercial land uses (far beyond either 2025 or 2030). As an example, the buildout number of dwelling units in Truckee is 19,990, while the 2000 count was 9,787 and the 2014 count was 12,858. This indicates that between 2000 and 2014 (through good times and bad) the average was 219 additional dwelling units per year. At this rate, buildout in housing units will not occur until 2046. The buildout for non-residential floor area (e.g., commercial uses) is even longer, and the General Plan allows for 79 percent growth between 2014 and buildout. So regardless of which year is assumed, the model is conservatively higher than what historic (e.g., over the last 20 years) development trends would indicate.

For information purposes, the following graph illustrates the increase in traffic projected to occur on SR 267 under Cumulative No Project Conditions. As shown, the average daily traffic on SR 267 during the peak month was approximately 12,500 in 2014 (Caltrans Traffic Counts). The Cumulative (Year 2034) No Project Traffic volumes derived from the Town of Truckee traffic model indicate an increase in summer peak day traffic volume to almost 20,000 vehicles per day and in winter peak day to over 22,000 vehicles per day. This represents an increase in traffic volumes in the range of 60 to 75 percent, which is higher than the trend in traffic growth on SR 267, which indicates that the traffic forecasts are conservative when compared to traffic growth trends.



PF29-30 The commenter questions the effectiveness of transportation mitigation measures, significance conclusions pertaining to the project's effect on transit, and rejection of transportation mitigation measures recommended in its letter of June 7, 2016. The comment letter to which this comment refers suggested that the EIR implied Mitigation Measures 10-1a and 10-1b would not reduce the project's significant impact to levels that are less than significant. However, the Draft EIR states that these mitigation measures would improve the operations to acceptable LOS C but disclosed that the improvement would require approval by Caltrans, and the impact was identified as significant and unavoidable because Placer County could not guarantee that Caltrans would optimize the signal timing. The comment refers to the discussion of the transit impact in the Final and suggests that the EIR authors may suggest that mitigation measures for transit would no longer be necessary because the Final EIR disclosed that the transit impact would be less than significant. This was not the case (see response to comment I018-27 in the Final EIR). Additionally, comment I041-39 did not reference the MRO report's discussion of Mitigation Measure 10-1a and 10-b; therefore, no response regarding these mitigation measures was provided in response to comment I041-39.

As indicated above regarding transit, even though the impact on transit services would be less than significant, the MVWPSP would implement Mitigation Measures 10-5a, payment of annual transit fees, and 10-5b, join and maintain membership in the TNTTMA. Further, the Development Agreement (Exhibit E) requires that the developer pay $68,000 annually as a regional contribution to transit operations and a one-time fee of $59,700 for operating and capital expenses. These funds would be used to increase transit service, and, because these fees would exceed the project's fair share, they could be used to expand transit service.

Response to Comment I041-39 in the Final EIR explains why the measures to be used at the Village at Squaw Valley would not be transferable to the MVWPSP.

Regarding bicycle use, the MVWPSP provides for 14 miles of trails connecting various internal uses and to regional trails. These paths could be used by bicyclists. It is not expected that bicycle use would substantially reduce project trips on SR 267 because of the steep grades that exist between the project site and the Lake.

The shuttle routes and schedules would be developed prior to the 340th residential unit, when the shuttle must be implemented.

Chapter 19, "Alternatives," as amended in the Final EIR, analyzes alternatives that would reduce the number of units, which in turn would reduce project trips.

PF29-31 The comment states that while the Final EIR correctly removes the business-as-usual (BAU) standard as a threshold of significance, the Final EIR does change significance conclusions and as result should be recirculated. The comment claims that the Draft EIR found operational GHG impacts to be less than significant, citing pages 12-9, 12-13, and 12-15 of the Draft EIR. In fact, the Draft EIR found construction impacts to be less than significant (i.e. page 12-9), but due to uncertainty surrounding post-2020 targets, the significance conclusion for operational emissions was determined to be potentially significant and unavoidable. While the BAU threshold language has been removed in the Final EIR, the significance conclusion has not changed and recirculation is not required.

The comment also contends that the document must be recirculated because GHG impacts in 2020 (or before) are a new impact not discussed in the Final EIR. The comment also suggests that incremental GHG emissions for each phase should be compared to PCAPCD's 1,100 MT CO_2/year Tier I threshold. The PCAPCD threshold applies to the proposed project and not to its component pieces. GHG emissions for construction and operation of the whole of the project have been quantified and Mitigation Measure 12-2 requires that any subdivision maps proposed under the project (i.e., before and after 2020) must reduce, to the extent necessary and feasible, GHG emissions such that the project operates within the targets, thresholds, or adopted plan in place at the time the map is submitted for approval. This means that every subdivision map submitted for approval will require further scrutiny and analysis and will need to demonstrate whether that portion of the project will exceed operational thresholds. Please also see Master Response 7 regarding GHG thresholds and analysis beyond 2020.

PF29-32 The comment questions the inclusion of BAU as a method of analysis to characterize the nature of the impact, when it is no longer recommended by the local air district and is not supported by substantial evidence. The comment also disagrees that a project resulting in a 30 percent reduction in GHG emissions would be considered "relatively GHG efficient," citing *Friends of Oroville v. City of Oroville* (2013). For these reasons, the comment questions the utility of the efficiency analysis and argues that the EIR should be recirculated to remove any references to NAT/BAU or the project being "efficient."

While the GHG emissions analysis examines whether the project is 21.7 percent below BAU, the standard is not used as a threshold of significance to determine the project's impact. The efficiency exercise, which found that the project would be 30 percent below BAU in 2020, was provided for informational purposes to show how the project compares to the ARB Scoping Plan trajectory. The comment's contention that any "new" emissions of GHGs constitute a significant impact is also inconsistent with the Supreme Court's direction in CBD v. CDFW which states that "…a certain amount of greenhouse gas emissions is as inevitable as population growth…" and that "…a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure." The project's operational emissions were ultimately found to be significant and unavoidable. Please also see Master Response 7 regarding GHG thresholds used, consistency with ARB's Scoping Plan, and significance conclusions.

PF29-33 The commenter asserts that the Draft EIR failed to properly analyze whether the project complies with applicable plans and policies for GHG reduction including AB 32, SACOG's MTP/SCS, Executive Order S-3-05, and Executive Order B-30-15. The comment also points out that past comment letters included suggestions as to how to conduct such analyses.

As described in the response to comment I041-59, the project's relationship to the MTP/SCS was considered, as was the commenter's approach to assume that the per capita reduction targets should apply to the project as a whole and determine whether the project would be consistent with these targets. It was concluded that this analysis would be an "apples-to-oranges" comparison to compare the proposed project's total emissions, which include both transportation and non-transportation sources of emissions, with a target that only accounts for transportation-related emissions from select vehicle classes. This would therefore, not be an appropriate threshold to use in analysis. The threshold used in the Final EIR addresses all emissions related to the construction and operation of the proposed project.

Regarding post-2020 targets identified in Executive Orders S-3-05 and B-30-15, as explained in Comment I041-60, neither of the cited executive orders include a provision that prescribes how lead agencies shall determine the significance of project-related GHG impacts in CEQA documents. In fact, guidance issued by the Schwarzenegger administration after issuance of S-3-05 clarified that the adoption of appropriate significance thresholds for CEQA evaluations was a matter of discretion for the lead agency. This guidance, published as a Technical Advisory by Governor's Office of Planning and Research, did not require Executive Order S-3-05 to be used as a significance threshold under CEQA (OPR 2008). Regarding the comment's suggestion to use significance thresholds from SANDAG's RTP/SCS, as described in Comment I041-60, Placer County is a very different environment than San Diego, and as lead agency, has the authority to determine its own thresholds of significance, supported by substantial evidence. The threshold used in the Final EIR and Mitigation Measure 12-2, which requires that emissions be calculated and analyzed at the time subdivision maps are submitted (before or after 2020), will properly account for emissions and require comparison to applicable, potentially more stringent, thresholds established in the future. Please also see Master Response 7.

PF29-34 The comment suggests that the Draft EIR underestimated the proposed project's GHG emissions by relying on inaccurate trip generation figures. See Master Response 5 of the Final EIR regarding trip generation. The comment expresses doubt that trip generation rates are actually overestimated. As explained in response to comment I041-62, trip generation rates were not stated to be overestimated, but CO_2e emissions that are generated as a result of VMT may likely be. This is because trips to MVWPSP that originate in the San Francisco Bay Area or the Sacramento metropolitan area are already quantified in their respective regional transportation plans and sustainable communities' strategies (RTPs/SCSs). The Draft EIR does not subtract emissions from trips that are already quantified in an adopted SCS. Therefore, the GHG transportation emissions, not trip generation rates, may be considered conservative because they include the totality of the project emissions and do not apportion them by trip origin.

PF29-35 The comment suggests that Mitigation Measure 12-2 is not sufficient to address GHG impacts. First, it states that the Final EIR employed a different threshold of significance and should mitigate impacts to below 1,100 MT CO_2e/year. It suggests that the Mitigation Measure is linked to statewide reduction goals that "may never exist" and that mitigation should not be deferred to a later date. The comment also states that measures should be evaluated now and required as conditions of approval for the project, and other measures should be identified if any of the actions provided in Mitigation Measure 12-2 are found to be infeasible.

As described in Comment PF14-2 (above), Mitigation Measure 12-2 requires that any subdivision maps submitted under the project (i.e. before and after 2020) be required to reduce, to the extent needed and feasible, GHG emissions such that the project operates within the targets or adopted plan established at the time the map is submitted for approval. This means that every subdivision map submitted for approval will require further scrutiny and analysis and will need to demonstrate whether it will exceed applicable operational thresholds. The MVWPSP outlines a number of potential actions that the project could take to meet applicable thresholds and requires that each action chosen be calculated for GHG

reduction potential. This list of potential actions is not intended to be limited or all-inclusive and may be supplemented with other measures, including actions that may not be technologically feasible now, but that may be feasible at the time of a future subdivision map submittal, as well as measures recommended in this comment. As long as the project demonstrates that future subdivision maps would comply with applicable GHG thresholds, other actions may be proposed at the time such maps are proposed. Finally, the Final EIR includes the provision for carbon offsets in the event that the GHG thresholds cannot otherwise be met through feasible onsite mitigation. This offset requirement assures that, even if sufficient reductions are not feasible within the project (and no information suggests this at this time), that the applicant will still be required to reduce GHG impacts to levels below established targets. The 1,100 MT CO2e/yr level is the Tier I threshold and the mitigation requires projects to comply with the Tier II threshold in place at the time of subdivision map approval. Because that threshold could change based on a variety of factors, e.g. County's GHG reduction plan, post-2020 targets, and the fact that the project's buildout duration goes past established goals, this determination is not made at this time.

Because GHG impacts of a project need to be addressed under CEQA, Mitigation Measure 12-2 establishes the parameters for analysis of each subdivision map. The absence of an adopted target at the State level would not preclude this project-level analysis. Moreover, ARB is working on a Scoping Plan to address the 2030 GHG reduction target put forth under Executive Order B-30-15. The target established under ARB's plan would be one example of the information referred to in Mitigation Measure 12-2.

PF29-36 The comment states that the EIR should be recirculated to allow comment on Alternative 5, discussed in the Final EIR. As addressed in response to comment PF29-2, above, and Master Response 1 in the Final EIR, recirculation of the EIR is not warranted. The comment states that the Final EIR's addition of Alternative 5: East Parcel Reduced Density Alternative requires the County to recirculate the EIR for another round of public review.

CEQA Guidelines Section 15088.5 sets forth the conditions under which recirculation of an EIR is warranted prior to certification. These conditions do not apply to the EIR on the proposed project for the reasons described below.

Recirculation is "an exception, rather than the general rule." (*Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 221.) Recirculation is required when a lead agency adds "significant new information" to the EIR after the close of the public comment period but prior to certification of the final EIR. (Pub. Resources Code, § 21092.1; Guidelines, § 15088.5.) "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." (Guidelines, § 15088.5, subd. (a).) To be "significant" a new alternative "must be feasible; it must be considerably different from other alternatives previously analyzed; it must clearly lessen the significant environmental impacts of the proposed project; and the project's proponents must decline to adopt it." (South County Citizens for Smart Growth v. County of Nevada (2013) 221 Cal.App.4th 316, 330; see also Guidelines, § 15088.5, subd. (a)(3).)

The inclusion of Alternative 5 in the Final EIR does not require recirculation of the Draft EIR because Alternative 5 is not "considerably different from others previously analyzed," is not feasible, and does not achieve basic project objectives. (See Guidelines, § 15088.5, subd. (a)(3).) First, Alternative 5 is not "considerably different" from the alternatives in the Draft EIR because Alternative 5 represents a hybrid of two of these alternatives. In *North Coast Rivers Alliance v. Marin Municipal Water District Board of Directors* (2013) 216 Cal.App.4th 614, the court held that an alternative added in response to comments that combines alternatives

previously analyzed was not "considerably different" and thus did not require recirculation. (Id., at p. 655.) Here, in response to comments, the Final EIR included Alternative 5: East Parcel Reduced Density Alternative, which combined two previously studied alternatives. As stated in the Final EIR, Alternative 5 "would reflect the same features as Alternative 2 … but would reduce the number of units … similar to the unit count evaluated in Alternative 3." (See, Final EIR, p. 2-35.) The circulated Draft EIR analyzed and disclosed all of the elements of both Alternative 2 and Alternative 3. (See Draft EIR, Ch. 19.) The addition of the hybrid Alternative 5 combines attributes of Alternatives 2 and 3 and therefore "merely clarifies or amplifies" the alternatives analysis in the EIR, and thus, does not trigger recirculation. (See Guidelines, § 15088.5, subd. (b).)

Second, the County has been provided with information concluding that Alternatives 3, and 5 would be infeasible. The information on Alternatives 3 and 5 is located in a report titled *Martis Valley West Parcel Specific Plan Economic Viability Analysis, Alternative 3 and Alternative 5* (May 2016). The County has independently peer reviewed the information in this report. The report concludes that the fixed, common costs (construction of roadways, water & sewer systems, utilities, homeowner amenities, etc.) would be such that a reduced density alternative on the West Parcel would not generate a sufficient internal rate of return to attract investors or obtain construction financing. These fixed costs would be substantially higher on the East Parcel in light of the more remote location of the East Parcel. The report concludes that, on either the East or West Parcel, a reduced density alternative would be financially infeasible.

Third, Alternative 2 would not meet the conservation objectives of the Project, and would hinder efforts to establish a large, continuous expanse of open space east of SR 267. (See Conservation Biology Institute, Landscape-scale Conservation in Martis Valley, California – A Paradigm for Collaborative Partnerships (November 2015).) Because Alternative 5 places development east of SR 267, the Alternative is inconsistent with this project objective in much the same manner as Alternative 2.

Because "the record reflects that there are substantial doubts" that Alternatives 2, 3, and 5 would be feasible, the inclusion of Alternative 5 does not require recirculation of the Draft EIR. (*North Coast Rivers Alliance, supra*, 216 Cal.App.4th at p. 656.)

PF29-37 The comment states that the EIR fails to provide a reasonable range of alternatives. The issues raised in this comment were addressed in Master Response 10, Alternatives, in the Final EIR. The range of alternatives, feasibility of alternatives, and suggested additional alternatives, including alternative site access, are discussed therein. See response to comment IO51-25 in the Final EIR regarding potential access to the project site from Highlands View Drive. As noted in Master Response 10, CEQA does not specify how many alternatives constitute a "range of reasonable alternatives," but provides the following guidance:

> "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." (Guidelines Section 15126.6(f))

PF29-38 The comment states that the EIR should be recirculated. As addressed in response to comment PF29-2, above, and Master Response 1 in the Final EIR, recirculation of the EIR is not warranted.

The comment recommends denial of the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF30

Kathi Heckert

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:31 PM
To: Kathi Heckert
Subject: FW: MVWP

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

-----Original Message-----
From: Blake Tresan [mailto:BTresan@truckeesan.org]
Sent: Tuesday, June 07, 2016 2:06 PM
To: Stacy Wydra
Cc: Liz Coombs
Subject: RE: MVWP

Hi Stacy,

In your Martis Valley Community Plan document, dated 6/2/16, you indicate on page 13 that wastewater generated by the project will be served by NCSD through its contract with TSD. Please recognize that, at his time, there is no contract that allows NCSD to serve the MVWP. NCSD and TSD are currently in preliminary negotiations regarding a contract that would allow NCSD to serve MVWP, but have yet to finalize any agreement. An executed agreement between NCSD and TSD will be required before NCSD can annex any property in the MVWP for sewer service. PF30-1

This may seem like a small point, but it is an important one timing wise regarding wastewater service for the MVWP. Please don't hesitate to contact me if you have any questions.

Sincerely,

Blake R. Tresan, PE
General Manager-Chief Engineer
Truckee Sanitary District
12304 Joerger Drive, Truckee, CA 96161
(530) 550.3122 Direct (530) 913.0013 Cell

(530) 587.3804 Main (530) 587.4199 Fax btresan@truckeesan.org www.truckeesan.org Committed to Protecting Truckee's Public Health and Environment Since 1906

PF30

Blake R. Tresan, PE, General Manager – Chief Engineer
Truckee Sanitary District
June 7, 2016

PF30-1 The comment notes that there is no current contract that allows the Northstar Community Services District (NCSD) to serve the MVWPSP and that NCSD and the Truckee Sanitary District (TSD) are in negotiations regarding a contract that would allow such service. The comment further states that an executed agreement between NCSD and TSD would be required before NCSD could annex any property in the MVWPSP for sewer service. The County and applicant recognize that this executed contract would be necessary prior to annexation of property in the MVWPSP for sewer service; negotiation and annexation would occur in accordance with procedures of NCSD and TSD.

Kathi Heckert PF31

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:33 PM
To: Kathi Heckert
Subject: FW: Martis Valley West Project

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

-----Original Message-----
From: Judy Carter [mailto:dird@sbcglobal.net]
Sent: Monday, June 06, 2016 10:56 PM
To: Stacy Wydra
Subject: Martis Valley West Project

Please, please, please do not approve the Martis West Valley Project. I am a home owner in Tahoe Vista right off of highway 267 and along with all the other detriments to our community that this development would cause, I am extremely concerned about all the additional traffic and pollution it will cause and even more importantly the risk and fear of congestion in trying to evacuate the North Tahoe Area of the basin should wildfire or earthquake and/or a tsunami occur. There is no valid reason to approve this development other than to fill placer county coffers. Long range it will prove disastrous for our beautiful gem and all those who treasure it. PF31-1
Judy Carter
1075 White Hall Ave.
Tahoe Vista, CA. 96148
916-837-3432

Sent from my iPhone

PF31 Judy Carter June 6, 2016

PF31-1 The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Issues related to traffic, pollution, and emergency evacuation are evaluated in the EIR.

MVWP Development LLC
PO Box 2537
Truckee, CA 96160

PF32

June 7, 2016

BY E-MAIL AND REGULAR MAIL

Stacy Wydra
Placer County Planning
3091 County Center Drive
Auburn, CA 95603

Re: Northstar Fire Department Letter

Dear Ms. Wydra:

This letter is submitted on behalf of Martis Valley West Project (MVWP) and MVWP Development LLC as clarification to a letter from the Northstar Fire Department (NFD), Chief Mark Shadowens, dated June 3rd 2016. Additional documentation correspondence attached.

First, we wish to thank the Northstar Fire Department's and the Northstar Community Services District's staff for their continued work on the MVWP. Their efforts and professionalism with the MVWP's Fire-life Safety study, Water Supply Assessment, Emergency Preparedness and Emergency Preparedness and Evacuation Plan is appreciated.

Chief Shadowens' in his recent letter opined on two elements which the MVWP intends to address with the NFD prior to any construction on site. The primary concerns expressed were in regards to emergency circulation, specifically secondary Emergency Vehicle Access (EVA) paving and dead end roads. As we have discussed, all emergency access roads that are required by State or County Code will be paved, and will meet City and County standards. PF32-1

The circulation exhibits in the environmental studies and specific plan are reflective of a conceptual level design, and the MVWPSP EIR, studies and approvals are at a programmatic level. Thus there are additional checks and balances as NCSD and NFD will approve and sign-off on the project's small lot final maps and civil improvement plans. Related, prior to civil improvement plans the MVWP will comply with all state and local requirements related to EVA construction, emergency circulation and loop/dead end roads. Compliance will ensure the project is designed and constructed in a safe and efficient manner.

In MVWP's follow-up dialogue with Chief Shadowens, we also talked about the MVWP's development parcel defensible space. MVWP has committed with the approval of Phase 0, civil improvements, MVWP will work with the NFD on annual fuels management to promote a healthy and safe forest. Additionally, the MVWP, if annexed into the NCSD in the future will comply with NFD/NCSD's defensible space ordinance.

We appreciate the opportunity to work with the County, NFD and NCSD. PF32-1 cont.

Thank you –

Kurt Krieg
Mountainside Partners

Cc: Mark Shadowens, NFD
Mike Staudenmayer, NCSD

Kurt Krieg

From: Stacy Wydra <SWydra@placer.ca.gov>
Sent: Monday, June 06, 2016 5:07 PM
To: Kathi Heckert
Cc: Shirlee Herrington; Phil Frantz; Huey Nham; Gerry Haas; Andy Fisher; Lisa Carnahan; Justin Hansen; Stephanie Holloway; Paul Thompson; EJ Ivaldi; Karin Schwab; fran.ruger@ascentenvironmental.com; 'Sydney Coatsworth' (sydney.coatsworth@ascentenvironmental.com); Suzanne Enslow; 'Adrienne Graham' (algraham@surewest.net); Kurt Krieg
Subject: FW: Roads

Hello All –
Please see Mark Shadowen's email below subsequent to his email from Friday, June 3rd at 9:19 AM. Additionally, I spoke to Mark this morning and he also mentioned that he spoke with the applicant's engineer, David Hagen and that the applicants are aware of his concerns as it relates to State and County Requirements for dead-end roads. Mark also understands that this is a programmatic level EIR and that when project level small lot tentative maps are submitted, the applicants will be required to comply with the standards/requirements at that time.
If you have any questions, please let me know.
Thank you!
Stacy

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Kurt Krieg [mailto:kkrieg@mountainsidepartners.com]
Sent: Saturday, June 04, 2016 11:45 AM
To: Stacy Wydra
Cc: Blake Riva; Adrienne Graham; Whit Manley; Paul Thompson
Subject: FW: Roads

Stacy –

As discussed yesterday (6/3) we will recap in a letter for the project file, however please see the below regarding Chief Shadowens' recent letter.

Thank you - Kurt

From: Mark Shadowens [mailto:MShadowens@northstarcsd.org]
Sent: Friday, June 03, 2016 1:20 PM
To: Kurt Krieg
Subject: Roads

Kurt

Spoke with David he knows what will have to be done when we get to finalizing road plans. I am good with everything based on our conversation today and my conversation with David.

Mark Shadowens
Fire Chief
Northstar Fire Department

N·C·S·D

Northstar Fire Department
Northstar Community Services District
910 Northstar Drive, Northstar, CA 96161
P: 530.562.1212•F:530.562.0702•www.northstarcsd.org

Board of Directors
JEANN GREEN
NANCY P. IVES
FRANK SEELIG, PRESIDENT
DARRELL SMITH
CATHY STEWART

Fire Chief
MARK SHADOWENS

June 3, 2016
Stacy Wydra
Placer County Development Resource Agency
3091 County Center Drive
Suite 190 Auburn Ca 95603

Dear Mrs. Wydra

I am writing to you based on one item of concern that I noted in the Final EIR in the Martis Valley Specific Plan. In a comment letter from Northstar Fire Department dated December 18 2015, I commented that all emergency access and egress roads that are required by local and state code shall be all weather paved surfaces. In section 2.2.2 Revisions to chapter 3 Project Description the last paragraph on page 2-8 the project applicant continues to reference a seasonal EVA that will utilize an existing dirt road. Based on the remote location of this proposed development it is the position of Northstar Fire Department that all roads be paved regardless of them being seasonal or not. Additionally exhibit 3-9 shows a road configuration that would not meet the requirements of Placer County for dead end roads. I do understand that the exhibit is not the final design standard but in order for this development to meet the current standards several of the roads within the exhibit would need to connect with the Fibreboard Freeway which I think directly effects the EIR.

I have made the project applicant aware of this issue and I am happy to speak directly with you at any time regarding this matter.

Sincerely,

Mark Shadowens
Fire Chief
Northstar Fire Department

PF32

Kurt Krieg
Mountainside Partners
June 7, 2016

PF32-1 This is a letter to the Northstar Fire Department (NFD) in response to PF15 from Mark Showdowens, NFD Fire Chief, from Kurt Krieg with Mountainside Partners. The commenter clarifies that all MVWPSP emergency access roads that are required by state or county code would be paved and would meet required standards. In addition, the letter clarifies that the circulation exhibits in the EIR are concept-level designs and that the Northstar Community Services District (NCSD) and NFD would need to approve and sign-off on the project's small lot final maps and civil improvement plans and that the civil improvement plans would comply with all state and local requirements related to emergency access and loop/dead end roads. Additionally, the letter notes that the MVWPSP would comply with NFD/NCSD's defensible space ordinance.

Kathi Heckert

PF33

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:31 PM
To: Kathi Heckert
Subject: FW: Martis Valley West Project

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Jan [mailto:jancrobert@hotmail.com]
Sent: Tuesday, June 07, 2016 2:56 PM
To: Stacy Wydra
Subject: Martis Valley West Project

Please vote AGAINST any more traffic affecting Highway 267. I own property along this route and some days it takes 10 + minutes to get out onto Highway 267. TOO MUCH TRAFFIC already. If there is fire along the ridge or in the Martis Valley West vicinity lives will be at risk with no viable exit route. Not to mention pollution. Holidays are already impacted as it is now, let alone adding more traffic. On some holiday weekends, highway 267 can come to a standstill. PF33-1

PLEASE PLEASE PLEASE vote against the project. Think of the impact it will have on pollution, the environment, and safety of all who enjoy Tahoe! Please, keep Tahoe SAFE for everyone!

Jan Robert

PF33 Jan Robert June 7, 2016

PF33-1 The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Issues related to traffic, pollution, and emergency evacuation are evaluated in the EIR.

Kathi Heckert PF34

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:32 PM
To: Kathi Heckert
Subject: FW: Martin Valley West plan

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

-----Original Message-----
From: Forrest Jones [mailto:forrestljones@earthlink.net]
Sent: Tuesday, June 07, 2016 10:45 AM
To: Stacy Wydra
Subject: Martin Valley West plan

I am a homeowner on Lake Tahoe's Brockway Point. My family has had the property and vacationed there since 1947. We have a vested interest in not destroying, polluting, and further overcrowding the already stressed Tahoe Basin. This Martis Valley West project threatens to do all of that, and you know it. Do not let it proceed. Thank you, Forrest Jones PF34-1

PF34 Forrest Jones June 7, 2016

PF34-1 The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Issues related to traffic, pollution, and growth are evaluated in the EIR.

Kathi Heckert PF35

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:32 PM
To: Kathi Heckert
Subject: FW: please register my voice against Martis Valley West Project

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Phyllis Rogers [mailto:tahoerogers@gmail.com]
Sent: Tuesday, June 07, 2016 6:43 AM
To: Stacy Wydra
Subject: please register my voice against Martis Valley West Project

This is not the forum for the reasons behind my decision, but I wish my voice to be heard in speaking against the Martis West development. PF35-1

Phyllis Rogers
Tahoe Basin resident
Incline Village

PF35 Phyllis Rogers June 7, 2016

PF35-1 The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

PF36

From: Stacy Wydra
Sent: Tuesday, June 07, 2016 4:32 PM
To: Kathi Heckert
Subject: FW: Development of Martis Valley West Parcel in Lake Tahoe area

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Helga Roghers [mailto:hroghers@icloud.com]
Sent: Tuesday, June 07, 2016 9:16 AM
To: Stacy Wydra
Subject: Fwd: Development of Martis Valley West Parcel in Lake Tahoe area

Sent from my iPad

Begin forwarded message:

> **From:** Helga Roghers <hroghers@icloud.com>
> **Date:** June 3, 2016 at 3:08:27 PM PDT
> **To:** planning@placer.ca.gov
> **Cc:** trpa@trpa.org
> **Subject: Development of Martis Valley West Parcel in Lake Tahoe area**
>
> I have lived in the Lake Tahoe area for 30 years, for the last twelve years in Carnelian Bay. My residence is right on Hwy. 28. I considered myself lucky not to be close to Tahoe City where grid log would start on top of Dollar Hill especially in the summer. Traffic has changed now as far as my community. Just going to Safeway in Kings Beach I have to wait and wait to get out of my driveway and then cars would be stopped at the beginning of Tahoe Vista to get through the PF36-1

light.
A 5 min. drive to Kings Beach could take me 20 min. or more.
A 25 min. Drive to Truckee takes about an hour.
In the winter we have chain control and cars are sometimes backed up for miles.
More and more people are on the roads going to work.
The traffic together with road construction is horrendous in the summer !
Try to go shopping at the super markets. People are fighting over parking spots!

This Martis Valley Project would add another 760 residences and commercial space. This would add thousands of people to the already crowded space around Lake Tahoe.
This monumental project is not suited for this area.

PF36-1 cont.

In addition a Camp Ground with 550 sites is planned at the top of Brockway. This development is irresponsible due to our EXTREME FIRE DANGER and aforementioned reasons.
Transient vacationers are not careful. I have a vacant lot next door and sometimes renters will walk through. One day there was a fire because someone had put a burning cigarette into the ground and the ambers ignited the roots. Another time they buried coals in the ground and it burned a large portion of that lot. Fortunately my neighbor was home and noticed the flames.

I hope that you agree with me that this camp ground would be a huge liability. If there was a fire we need a way out!

Please consider the terrible consequences these projects would have.

PF36-2

Sincerely,
Helga Roghers
P.O.Box 898
Carnelian Bay, Ca. 96140

Sent from my iPad

PF36

Helga Roghers
June 3, 2016

PF36-1 The comment expresses concern regarding traffic in North Lake Tahoe and the impact of the project. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR Chapter 10, "Transportation and Circulation," as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation.

The comment expresses opposition to the project as it is currently proposed. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF36-2 The comment raises concerns regarding the Brockway Campground and wildfire danger. Brockway Campground is a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The MVWPSP Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal. Wildfire hazards are addressed in Chapter 18 of the Draft EIR as well as in Master Response 9 in the Final EIR.

Comments regarding preferences for the MVWPSP and Brockway Campground projects will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF37

KEEP TAHOE BLUE.

Placer County
Planning Services Division
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145

Ascent Environmental, Inc.
455 Capitol Mall, Suite 300
Sacramento, CA 95812

Date: June 8, 2016
To: Ms. Stacy Wydra and Ms. Fran Ruger
From: The League to Save Lake Tahoe
Re: Comments on Martis Valley West Parcel Specific Plan Final Environmental Impact Report

Dear Ms. Wydra and Ms. Ruger,

The League to Save Lake Tahoe (the League) appreciates the opportunity to provide comments on the Martis Valley West Parcel Specific Plan Final Environmental Impact Statement (FEIR). Due to the numerous insufficiencies and inadequacies of this FEIR, we feel strongly that it cannot be certified as presented today. The League's comment letter details specifics as to why the FEIR is flawed. The League hereby incorporates and references the comment letter submitted on June 7, 2016 by Sierra Watch and Mountain Area Preservation as well as their traffic expert analysis conducted by Mr. Neal Liddicoat. Outlined below are the most egregious reasons as to why the FEIR must be denied certification under the California Environmental Quality Act (CEQA). The associated comment letter contextualizes these and other issues related to the review. PF37-1

- **The FEIR is Inadequate Because It Does Not Account for the Negative Traffic Impacts the Specific Plan Will Generate in the Lake Tahoe Basin.**
- **The FEIR is Inadequate Because Placer County Failed to Meet CEQA Requirements by Coordinating with TRPA.**
- **The FEIR Ignores Current Placer County and TRPA Planning Efforts. Placer County is also the Lead Agency for the Squaw Valley Project and Lake Tahoe Basin Area Plan Which Have Been Ignored in this FEIR. This Makes the FEIR Inadequate.**
- **The FEIR Ignores Cumulative Impacts Associated with Brockway.**
- **The FEIR Ignores the Alternative Proposed by the League and Other Organizations.**

- **This FEIR Should Not Be Approved or Certified under CEQA. There Are Not Enough Appropriate Overriding Considerations to Approve FEIR Over Detrimental Environmental Impacts.**

PF37-1 cont.

As the oldest running environmental organization for Lake Tahoe the League cannot support this project as proposed today due to the detrimental impacts to the region. For these reasons and the others discussed in the comment letter, the League requests that the FEIR be revised to address all of the League, Sierra Watch, and Mountain Area Preservation concerns.

Sincerely,
Darcie Collins, PhD
Executive Director
League to Save Lake Tahoe

Enclosures

2016.6.8 League to Save Lake Tahoe Comments on Final Environmental Impact Report for the Martis Valley West Specific Plan

PF37

Darcie Collins, PhD, Executive Director
League to Save Lake Tahoe
June 8, 2016

PF37-1 The comment incorporates by reference the letter PF 29 from MAP and Sierra Watch. Please refer to responses to comments PF29-1 through PF29-38. In addition, the comment summarizes a set of issues of concern. Please refer to the responses to the League to Save Lake Tahoe comments provided in PF38-1 through PF38-13.

The comment asserts that the EIR does not meet CEQA requirements and should be recirculated. As addressed throughout the responses to comments in the Final EIR and those included herein, the Draft EIR was prepared in compliance with CEQA and provides a sufficient evaluation of the project's potential environmental effects for the public and decision makers. See response to comment PF13, above and Master Response 1 in the Final EIR.

PF38

Placer County
Planning Services Division
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
SWydra@placer.ca.gov

Ascent Environmental, Inc.
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Date: June 8, 2016
To: Ms. Stacy Wydra and Ms. Fran Ruger
From: The League to Save Lake Tahoe

Re: Comments on Final Environmental Impact Report (FEIR) for the Martis Valley West Parcel Specific Plan

Dear Ms. Wydra and Ms. Ruger,

The League to Save Lake Tahoe (the League) has taken the opportunity to review the Final Environmental Impact Report (FEIR) for the Martis Valley West Specific Plan (Specific Plan). The Specific Plan has been brought forth by Mountainside Partners (project proponents) following years of discussions and negotiations, many of which the League was a participant.

While the League is in support of a significant conservation component of the Specific Plan, the League is disappointed with both the adequacy of the review and dismissal of traffic impacts to Lake Tahoe associated with the Specific Plan. The Specific Plan lies outside of the Lake Tahoe Basin and the jurisdiction of the Tahoe Regional Planning Agency (TRPA), but will still have negative environmental consequences to the Basin. Because of the importance of Lake Tahoe as an Outstanding National Resource Water, as well as the unique and comprehensive environmental standards governing the Lake Tahoe Basin, it is essential that the project be denied as it is proposed today. There must be a genuine analysis that looks at real impacts associated with traffic to the Basin. The League urges Placer County Board of Supervisors (BOS) to not certify the FEIR as it is presented today. The FEIR does not meet California Environmental Quality Act (CEQA) requirements for certification as described in these comments. Approving the Specific Plan and FEIR could only be used with arbitrary findings and inappropriate overriding consideration that disregard environmental impacts. The following comments on the FEIR address the concerns of the League as they relate to impacts to the Lake Tahoe Basin: PF38-1

I. **The FEIR is Inadequate Because It Does Not Account for the Negative Traffic Impacts the Specific Plan Will Generate in the Lake Tahoe Basin.**
   a. ***Impacts Associated with a Drop to Level of Service (LOS) in Lake Tahoe Basin Are Ignored While Impacts Associated with an Increase to Vehicle Miles Travelled (VMT) to Lake Tahoe Basin are also Ignored.***
   b. ***The Changes Made to the Transportation and Circulation Mitigation Measures Are Meaningless. These Weak Mitigation Measures Do Not Hold Project Proponents Accountable nor Mitigate Impacts to the Lake Tahoe Basin.***

II. **The FEIR is Inadequate Because Placer County Failed to Meet CEQA Requirements by Coordinating with TRPA.**

III. **The FEIR Ignores Current Placer County and TRPA Planning Efforts. Placer County is also the Lead Agency for the Squaw Valley Project and Lake Tahoe Basin Area Plan Which Have Been Ignored in this FEIR. This Makes the FEIR Inadequate.**

IV. **The FEIR Ignores Cumulative Impacts Associated with Brockway.**

V. **The FEIR Ignores the Alternative Proposed by the League and Other Organizations.**

VI. **This FEIR Should Not Be Approved or Certified under CEQA. There Are Not Enough Appropriate Overriding Considerations to Approve FEIR Over Detrimental Environmental Impacts.**

PF38-1 cont.

Background

The Specific Plan proposal put forth by the project proponents is a result of years of negotiations, public comment, and agency input. The League was engaged by the project proponents in early 2012 to discuss the project and its associated conservation easement because a portion of the original project was within the Lake Tahoe Basin. The League and other conservation groups such as Mountain Area Preservation (MAP), Sierra Watch, and Sierra Club participated in discussions relating to the appropriateness of development entitlements for the project coupled with a significant amount of environmental conservation. The original project proposal spanned what is now designated as the West Parcel in the Specific Plan of Martis Valley and a 112.8 acre portion of the Lake Tahoe Basin, which would have required TRPA approval. It also included what is to be designated as conservation as the East Parcel of the Specific Plan.[1]

PF38-2

The original proposal had essentially three planning components. The first and second components were the West Parcel located in Martis Valley within Placer County (1,052 acres) and the Lake Tahoe Basin (112.8 acres) parcel, both of which would have been the location site for development. The development project included 760 units and 6.6 acres of commercial property spanning both Placer County and TRPA jurisdictions. The project proponents sought a Resort Recreation designation through an Area Plan under the TRPA Regional Plan Update (RPU) for the Lake Tahoe Basin portion of development. The third component was the East Parcel which included a designation as

[1] Martis Valley West Parcel Specific Plan. Preliminary Draft. May 2014. Prepared by East West Partners. 1.3 Plan Authority. p.10.

conservation for over 6,000 acres of open space in Martis Valley.[2] The project proponents ignored guidance given by the League and other conservation groups in delaying the Lake Tahoe Basin development and establishing environmental targets as required by the RPU for Area Plans. Neither the Resort Recreation designation nor the Area Plan were redevelopment opportunities envisioned by the RPU. There was significant public and TRPA Governing Board pushback when the first Notice of Preparation (NOP) for the original project was released in May of 2014. While the League supported the overall concept of conservation for the East Parcel within Martis Valley, the League did not find that the Lake Tahoe Basin portion of the project complied with TRPA RPU goals and policies. The significant criticism surrounding the original proposal resulted in the project proponents temporarily eliminating the Lake Tahoe Basin development. PF38-2 cont.

The project proponent shifted the 760 units and 6.6 acres of commercial development from the original Placer County and Lake Tahoe Basin project site to only the Placer County jurisdiction. This is what has now created the Specific Plan that is discussed today. The Specific Plan is directly adjacent to the Lake Tahoe Basin parcels that were part of the original project proposal. The revised NOP for the Specific Plan was released in February of 2015. The project proponents have continuously touted their gesture in removing the Lake Tahoe Basin component of the Specific Plan.[3] However, in July of 2015 the project proponents applied for a new TRPA permit for the Lake Tahoe Basin parcel for Brockway campground (Brockway). The Brockway campground permit will seek approval from the TRPA for a 550-site developed campground including tent sites, camper sites, permanent shelters, a lodge, meeting pavilions, and other permanent structures.[4] While the Specific Plan and Brockway projects require separate approval processes, their infrastructure and environmental impacts are intertwined. Not only have they been proposed by the same project proponents, but they very likely will be merged into the original project proposal once the infrastructure for both projects has been approved. The Brockway proposal will require its own environmental analysis under CEQA and the TRPA Bi-State Compact (the Compact). However, the cumulative impacts associated with the Specific Plan and Brockway projects were ignored and piecemealed in both the Draft Environmental Impact Report (DEIR) and FEIR. PF38-3

The public process for the Specific Plan (and Brockway) have been incredibly complex, rushed, and forced. It has been difficult for public officials and other professional stakeholders to keep pace, let alone general public. The Brockway project was submitted to both Placer County and the TRPA in July 2015. The DEIR for the Specific Plan was released in October of 2015. Placer County released a FEIR for an unrelated Squaw Valley Project in April 2016 which is a document close to 4,000 pages long (this project and cumulative impacts to Lake Tahoe will be discussed later). Placer County then released the Specific Plan FEIR less than a month later in May 2016 which is a document over 2,000 pages long. The Specific Plan project and FEIR went forward to approval to an advisory council nine days after it was released and has now leap-frogged the Squaw Valley project approval process and PF38-4

[2] Martis Valley West Parcel Specific Plan. Preliminary Draft. May 2014. Prepared by East West Partners. 6.4 Designated Open Space. p.65.
[3] Placer County Planning Commission. November 19, 2015. Public Hearing on Martis Valley West Specific Plan Draft Environmental Review. Transcript in Volume II Martis Vally West Parcel Specific Plan FEIR.
[4] Brockway Campground Minor Use Permit Project Description and Site Design Maps. Submitted to TRPA July 31, 2015. Pages 4,5 of 8.

has been slotted for Planning Commission approval June 9, 2016 and BOS July 26, 2016. It appears both the Specific Plan project and FEIR have been forced at the hand of the project proponents through this disingenuous public process. The League urges the BOS to influence the final Specific Plan project and FEIR rather than simply processing it. PF38-4 cont.

The League, Sierra Watch, and MAP met with Placer County staff on March 2, 2016 and April 13, 2016 to discuss concerns relating to the DEIR/FEIR and the public process for the Specific Plan. The League explained in detail the significant impacts this project would have to Lake Tahoe in terms of traffic and how these concerns have been dismissed. Minimal efforts had been made in updating mitigation measures. The DEIR and FEIR cannot be proof of a public process under CEQA. The Placer County Planning Director stated that there was still time to influence the project before it is approved through a staff discretionary review. It was made clear by him to all of the organizations that our issues would be addressed. The League repeated this commitment to the BOS at their April 19, 2016 meeting so that this could be part of public record.[5] It is the responsibility of Placer County as the lead agency of the DEIR and FEIR to influence the approval process for the Specific Plan. On May 12, 2016 the North Tahoe Regional Advisory Council (NTRAC) voted that the Planning Commission table approval of the project as proposed today to allow that body and the public more time to review. This was the advisory council given only nine days to make a decision on a 2,000 paged document. They also voted that the project not be approved as it has been currently proposed as there were too many unanswered questions raised not only by the public, but members of NTRAC.[6] Placer County staff has ignored the NTRAC recommendation by moving forward with allowing the Planning Commission to consider approval on June 9, 2016. All of these things must be considered by the BOS when making their overriding considerations and should deny certification of this FEIR. The League highlights specific concerns relating to the FEIR below. PF38-5

I. The FEIR is Inadequate Because It Does Not Account for the Negative Traffic Impacts the Specific Plan Will Generate in the Lake Tahoe Basin.

The FEIR essentially concludes that the Specific Plan will increase vehicle miles traveled (VMT) to the Lake Tahoe Basin, but to a point where the project proponents do not have to be held accountable for their actions. The project proponents are being "let off the hook" with conclusions drawn in the FEIR stating a traffic increase does not matter along with meaningless mitigation measures. Traffic impacts and concerns must be addressed before the Specific Plan is approved. PF38-6

a. Impacts Associated with a Drop to Level of Service (LOS) in Lake Tahoe Basin Are Ignored While Impacts Associated with an Increase to Vehicle Miles Travelled (VMT) to Lake Tahoe Basin Are Also Ignored.

The DEIR for the Specific Plan ignored a general assessment of VMT increase and associated impacts to the Lake Tahoe Basin, but did acknowledge that the Specific Plan would drop the level of service (LOS) to the region. The FEIR now choses to ignore concerns raised by the League relating to

[5] Placer County BOS Meeting. April 19, 2016. Squaw Valley Resort. Squaw Valley Creek, CA. Video: http://placer.granicus.com/ViewPublisher.php?view_id=6.
[6] North Tahoe Regional Advisory Council Meeting. May 12, 2016. Tahoe City PUD. Electronic minutes unavailable at time this letter was submitted.

unacceptable LOS service, while also inadequately assessing impacts associated with VMT increase to the Lake Tahoe Basin. The DEIR concludes that the Specific Plan will drop the LOS for the segment of the SR267 to SR28 (segment within Lake Tahoe Basin in Kings Beach) to unacceptable service and that this cannot be mitigated. The project proponents will pay a fee to County Improvement Program (CIP), but that section of roadway is controlled by Caltrans, so payments to the County would have no effect on its management.[7] The FEIR agrees with the assumption and concludes that the unacceptable LOS is significant and unavoidable.[8] The League requested other mitigation be considered, but this request was ignored. The FEIR has concluded that there will be a drop in LOS and increase to VMT as discussed below. However, it states the VMT increase can be mitigated to a level of less than significant. This is inherently contradictory and makes the FEIR inadequate.

The FEIR does what should have been done in the DEIR by doing a VMT assessment to the Lake Tahoe Basin. However, it ignores an impact assessment associated with the VMT increase. The FEIR states several times the analysis does not fall under TRPA jurisdiction so is not required to meet the Compact requirements. The FEIR points out, PF38-6 cont.

> "On a peak travel day, the project would generate approximately 13,745 VMT within the Tahoe Basin. Total VMT in the TRPA boundary was estimated in the Regional Transportation Plan (TMPO and TRPA 2012) to be 1,984,600 for summer 2010 conditions. Based on this benchmark, which is considered the best available data, the project would result in an estimated 0.7 percent increase in VMT within the TRPA boundary. The TRPA environmental threshold carrying capacity threshold calls for the Tahoe Region's VMT to be at least 10 percent below its 1981 level, or 2,067,600 VMT. The addition of the project's VMT to the 2010 summer value would result in 1,998,345 VMT, which would remain below this VMT threshold.[9]"

There are brief discussions of other in-Basin projects and relationship to VMT increase in the Basin and what constitutes a significant increase. It then however concludes there is not a standard to use when determining "significant.[10]" To simplify, this FEIR concludes there will be an increase to VMTs in the Basin, it is unsure if this is significant, but because the increase is less than what exceeds the ultimate TRPA carrying capacity, an overall impact assessment does not need to be done. This is an arbitrary analysis. A rational deduction can be made that a 0.7 percent increase to VMT within the Lake Tahoe Basin is significant because this means thousands of more trips which directly relate to increased air quality and water quality impacts. Specifically, increased traffic will result in negative impacts as they relate to greenhouse gas emissions and increases to fine sediment particles from roadways into Lake Tahoe.

---

[7] Draft Environmental Impact Report Martis Valley West Parcel Specific Plan. October 22, 2015. Prepared for Placer County by Ascent Environmental. Master Responses. p.10-43.
[8] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Comments to Responses. p.3.5-258.
[9] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Master Responses. p.3-17.
[10] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Master Responses. p.3-18.

MAP and Sierra Watch had Mr. Neal K. Liddicoat, P.E. a Traffic Engineering Manager for MRO Engineers conduct an assessment of the traffic analysis. His detailed report explains deficiencies in trip generations through the DEIR and FEIR. The League incorporates the whole assessment by reference for purposes of these comments. The League referred to his first analysis in comments submitted on the DEIR referring to a lack of general VMT assessment. As stated in those comments, "... analysis presented in DEIR Chapter 10 reveals virtually no mention of VMT and certainly no documentation of the assumptions and procedures employed in developing in VMT estimates."[11] The FEIR traffic assessment concludes that,

PF38-6 cont.

> "FEIR Master Response 6 is intended to answer the many questions that were raised regarding the treatment of this topic in the DEIR. We must note, once again, that the project's VMT estimate is inaccurate because of the significant deficiencies in the trip generation estimates described [in this report] particularly with respect to internal trips at the proposed project. Correcting those errors will result in higher VMT values."[12]

Not only is conclusion that the VMT increase to the Lake Tahoe region inadequate in determining significance, but Mr. Liddicoat's report explains how the overall values are incorrect. These deficiencies must be remedied for an accurate VMT and associated impact analysis. As already discussed the LOS for the area will drop to a significant unacceptable level. The conclusions drawn are confusing and conflicting. The impacts relating to traffic are ignored through the inadequate VMT analysis. An actual impact analysis as it relates to VMT increase must be done. Certification of the FEIR must be denied based off of all of these reasons.

b. The Changes Made to the Transportation and Circulation Mitigation Measures Are Meaningless. These Weak Mitigation Measures Do Not Hold Project Proponents Accountable nor Mitigate Impacts to the Lake Tahoe Basin.

Minimal changes were made to mitigation measures under the "Transportation and Circulation" section of the DEIR and the League's request for adequate mitigation was ignored. The below mitigation measures shifted impacts related to transit in Impact 10-5: Impacts to Transit from Potentially Significant (PS) to Less than Significant (LTS).[13] As explained below, this shift should not have been made. The mitigation measures state:

PF38-7

> "*Mitigation Measure 10-5a*: Payment of annual transit fees: Prior to recordation of the initial Small Lot Final Map, the applicant shall establish a new Zone of Benefit (ZOB) within an existing County Service Area (CSA) or annex into a pre-existing ZOB to provide adequate funding of capital and ongoing operational transit

---

[11] Review of Transportation and Circulation Analysis Martis Valley West Parcel Specific Plan Final Environmental Review. June 1, 2016. Prepared for Shute, Mihaly & Weinberger LLP by MRO Engineers. p.27.
[12] Review of Transportation and Circulation Analysis Martis Valley West Parcel Specific Plan Final Environmental Review. June 1, 2016. Prepared for Shute, Mihaly & Weinberger LLP by MRO Engineers. p.27.
[13] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Revisions to DEIR. p.2-18.

services/requirements. The applicant shall submit to the County for review and approval a complete and adequate engineer's report supporting the level of assessments necessary for the establishment of the ZOB. The report shall be prepared by a registered engineer in consultation with a qualified financial consultant and shall establish the basis for the special benefit appurtenant to the project.

Mitigation Measure 10-5b: Join and maintain membership in the Truckee-North Tahoe Transportation Management Association: Prior to approval of Improvement Plan and/or recordation of the Final Map, the commercial and homeowner associations shall join and maintain membership (at the rate defined by the TNT/TMA and tied to improvements to be funded) in perpetuity in the Truckee-North Tahoe Transportation Management Association (TNT/TMA), whose established purpose is to improve the general traffic and transportation conditions in the Truckee/North Tahoe area, and to address situations associated with traffic congestion and transportation systems.[14]" PF38-7 cont.

These updated mitigation measures lack detail on how they could truly be considered mitigation or what positive consequences they would have. *Mitigation Measure 10-5a* requires that the project proponents contribute funding to either a ZOB or CSA without any description as to what this means. There is no discussion as to an actual amount, where directly this funding will go to, how the funding will be traced, if it is a continual or one-time contribution, or if any of this will improve transit to the Lake Tahoe Basin. The mitigation measure is a lot of words describing a contribution that could happen, at some point, and go somewhere. This is another example of an arbitrary and capricious assessment in this FEIR. The purpose of mitigation measures is to detail how impacts will be mitigated, which is not the case here. This mitigation measure does not and will not hold the project proponents accountable for transit impacts to the Lake Tahoe Basin. This mitigation measure is weak because of its lack of details.

Mitigation Measure 10-5b is equally as arbitrary and capricious as to what it means and how it will mitigate impacts. It states that the commercial and homeowner associations will be a part of an association without a real discussion as to what the TNT/TMA is or what a "membership" entails. It does not discuss how the project proponents will hold either the commercial or homeowner associations accountable in attending and participating in TNT/TMA. In short this mitigation measure states, the homeowner association (not the project proponents) will be a member of an association that the FEIR explains nothing about, making this mitigation measure meaningless and arbitrary.

Having two mitigation measures without any detail that shift a critical impact from Potentially Significant (S) to Less Than Significant (LTS) is not only inadequate in terms of an appropriate environmental review, but is a blatant disregard of solutions to transit impacts to the Lake Tahoe Basin. It is the responsibility of Placer County to influence the project approval process through the FEIR. It would be irresponsible for the BOS to certify the FEIR as it is presented today because of the overall disregard of VMT impacts to Lake Tahoe and lack of meaningful mitigation measures. The conclusions drawn and

[14] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Revisions to DEIR. p.2-18.

mitigation, or lack thereof, between LOS and VMT are inadequate and must be resolved. The League recommends that the certification of the FEIR be denied. An actual environmental analysis should include more details to the above mitigation measures and consideration of requiring the project proponents to increase transit opportunities from the project area to the Basin. PF38-7 cont.

II. The FEIR is Inadequate Because Placer County Failed to Meet CEQA Requirements by Coordinating with TRPA.

The FEIR cannot be certified as presented today because Placer County failed to meet CEQA requirements by coordinating efforts with the TRPA. CEQA requires that as the lead agency, Placer County shall consult with and request comments on the draft EIR from, "any other state, federal, and local agencies which have jurisdiction by law with respect to the project or which exercise authority over resources which may be affected by the project.[15]" Placer County ignored consultation with TRPA during the environmental review process for this Specific Plan. In response to the League's request for recirculation of the DEIR for lack of consultation, the FEIR states that the TRPA was consulted because the original Area Plan proposal was withdrawn.[16] This does not meet the above definition of consultation. This is a blatant disregard of CEQA requirements. It took the League to urge the TRPA at their December 16, 2015 Governing Board meeting to provide comments on the Specific Plan DEIR for the agencies to consult.[17] The TRPA did provide comments on December 22, 2016 days after the comment period had closed for the DEIR. These comments related specifically to traffic impacts. PF38-8

The comments provided by TRPA on the DEIR did include a discussion as to what should be assessed in terms of their threshold analysis. The FEIR concludes, "Because the project is located outside the Tahoe Basin and outside the jurisdiction of TRPA, the analysis does not address the unique regulatory requirements of TRPA (e.g., TRPA goals, policies, and environmental threshold carrying capacities)."[18] While TRPA does not have authority over the actual permit for the Specific Plan, it does have authority over the region whose resources will be impacted as already discussed. This triggers the consultation requirement under CEQA, which again, was ignored. This alone should constitute denial of the certification of the FEIR. The TRPA specifically requested that adequate mitigation be incorporated in the FEIR to mitigate VMT increase to the Lake Tahoe Basin.[19] For reasons already discussed above, the FEIR did not do this. The FEIR ignored requests made by both the League and TRPA for adequate mitigation. The Specific Plan cannot be approved as proposed. The DEIR and FEIR have ignored current planning efforts underway involving both Placer County and TRPA discussed below.

---

[15] § 21000 CCR, Title 4, Chapter 3 (CEQA) §15086 (a)3.
[16] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Comments to Responses. p.3.5-258.
[17] Oral Comments provided by Shannon Eckmeyer. TRPA Governing Board meeting Stateline, NV. December 16, 2015. http://www.trpa.org/wp-content/uploads/January-27-2016-Governing-Board-Packet.pdf p.7.
[18] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Comments to Responses. p.3.5-256.
[19] Final Environmental Impact Martis Valley West Parcel Specific Plan. May 2016 Prepared for Placer County by Ascent Environmental. Comments and Responses. p. 3.3-3,4.

III. The FEIR Ignores Current Placer County and TRPA Planning Efforts. Placer County is Also the Lead Agency for the Squaw Valley Project and Lake Tahoe Basin Area Plan Which Have Been Ignored in this FEIR. This Makes the FEIR Inadequate.

Placer County is the lead agency for not only the Specific Plan analyzed in this FEIR, but another major development project called the Village at Squaw Valley Specific Plan (Squaw Valley Project) and the Lake Tahoe Basin Area Plan (the Area Plan). The Specific Plan FEIR does not include a discussion of cumulative impacts associated with the Squaw Valley Project or of the current Area Plan planning efforts. This dilutes the public process for the Specific Plan.

The FEIR concludes that CEQA does not require that TRPA Compact thresholds be applied in its analysis because the Specific Plan lies outside of TRPA's jurisdiction.[20] The League would like to highlight in these comments the current planning efforts between Placer County and TRPA and explain why the FEIR should include a threshold analysis, specifically as it relates to VMT increase to Lake Tahoe. In 2012, the TRPA adopted the RPU, which created the concept of area plans. The purpose of area plans is to focus redevelopment within urbanized areas to streamline permitting and incentivize environmental restoration. Placer County and TRPA have embarked on an area planning process for over four years. The League supported the RPU and in turn has worked as a collaborative stakeholder with both Placer County and TRPA through the area plan efforts. The Area Plan includes policy and projects within Lake Tahoe to decrease VMT problems to the North Shore and improve traffic flow. A recently adopted project called Fanny Bridge was approved by both Placer County and TRPA to improve traffic flow within Tahoe City, California. The League has raised concerns to Placer County staff in both the March and April 2016 meetings about how the Specific Plan will negatively impact the process being made in planning efforts put forth in the Area Plan. PF38-9

The FEIR concludes, as already discussed, that there will be an increase to VMT in the Lake Tahoe Basin, but not enough to go above the TRPA VMT threshold, and that TRPA thresholds are inapplicable anyway. The FEIR completely ignores the Area Plan efforts by not mentioning it. The Area Plan and Fanny Bridge project are intendec to help improve *current* traffic conditions. They cannot be used as mitigation or substitute for a lack of traffic impact assessment to the Lake Tahoe Basin for this Specific Plan.

The Squaw Valley Project is another significant cevelopment outside of the Basin that would also add thousands of additional VMT to the Lake Tahoe Basin. The scoping for this Specific Plan and DEIR were released after before the scoping and DEIR of the Squaw Valley Project, yet a discussion of cumulative impacts has been completely ignored. The cumulative impacts associated with both the Squaw Valley Project and the Specific Plan and how they relate to the Area Plan efforts have been discussed at length in both Placer County and TRPA public hearings. The process has been so complicated and confusing that Placer County Supervisor Jennifer Montgomery requested at the BOS meeting on January 24, 2016 that the Area Plan environmental draft environmental review be released with a cumulative impact assessment prior to both the Specific Plan and Squaw Valley Project FEIR.

[20] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Comments to Responses. p.3.5-256

releases to be able to guide both FEIR reviews.[21] This request was ignored along with a cumulative impact assessment of the Squaw Valley Project and Area Plan in this Specific Plan FEIR.

The League highlights these concerns because both the Specific Plan and Squaw Valley Project FEIRs ignore efforts to curb VMT in the Area Plan. These comments must be included in this letter as they will be referenced in both the Squaw Valley Project FEIR and Area Plan environmental review comments. They must be included in the record in the event that cumulative impacts continued to be ignored in the Area Plan environmental review. As already stated in these comments, the Specific Plan will increase the VMT threshold carrying capacity to the Lake Tahoe region by 0.7 percent. The Squaw Valley Project will increase the VMT threshold carrying capacity by 1.2 percent.[22] The FEIR for both of these projects conclude that VMT increase will not cause an exceedance of the TRPA VMT threshold. However, cumulatively these projects move the entire Tahoe Basin almost 2 percent closer to its VMT limit. Put another way, since the Basin is 10 percent below the threshold, the two out-of-Basin projects close about a fifth of the gap remaining toward the TRPA VMT threshold limit for the entire Lake Tahoe Basin region. This does not include any potential cumulative impacts associated with the Brockway proposal as discussed below. PF38-9 cont.

Placer County as the lead agency for these projects and the Area Plan cannot ignore the detrimental cumulative impacts associated with this VMT increase. There is no discussion as to what happens in terms of environmental impacts once the 10 percent gap towards the threshold is erased. There is also no discussion as to what this means for Placer County and future projects actually *within* the Lake Tahoe Basin. If the BOS approves this Specific Plan and certify the FEIR as proposed today, they are casting a vote against future appropriate redevelopment projects within the Basin and a vote for a continued increase to VMT rather than solving an already dire situation. The Area Plan planning efforts cannot be used as mitigation measures for this or the Squaw Valley Project FEIR. The Area Plan planning efforts are meant to remedy *currently existing traffic conditions*. Placer County must hold the project proponents accountable for increased VMT to the Lake Tahoe Basin by enforcing adequate mitigation. The League stated these concerns as part of the public record at the TRPA Governing Board meeting on May 25, 2016.[23] As lead agency for all of these environmental reviews, Placer County should not certify this Specific Plan FEIR as presented today because it has ignored traffic impacts to the Lake Tahoe Basin, cumulative impacts associated with Squaw Valley Project, and ignore the Area Plan efforts to improve existing conditions.

IV. <u>The FEIR Ignores Cumulative Impacts Associated with Brockway.</u>

PF38-10

As discussed above the cumulative impacts as they relate to VMT increase to the Lake Tahoe Basin between the Specific Plan and Squaw Valley Project have been ignored in the FEIR. The FEIR also continues to ignore cumulative impacts associated with Brockway campground. The FEIR claims it

[21] Placer County BOS Meeting, Jan 24, 2016. North Lake Tahoe Event Center, Kings Beach, California. Video: http://placer.granicus.com/ViewPublisher.php?view_id=6.
[22] Final Environmental Impact Report Village at Squaw Valley Specific Plan. April 2016. Prepared for Placer County by Ascent Environmental. Master Responses. p. 3-25.
[23] TRPA Governing Board Meeting. Oral Comments. May 25, 2016. North Tahoe Events Center, Kings Beach, California.

conducted a cumulative impact analysis by listing Brockway in cumulative projects list.[24] This cannot constitute a cumulative impact analysis, specifically as it relates to increased VMT to the Lake Tahoe Basin. The project proponents for these projects are one in the same and Placer County is the lead agency. By ignoring a true cumulative analysis, the FEIR is inadequate. PF38-10 cont.

V. The FEIR Ignores the Alternative proposed by the League and Other Organizations.

The FEIR considers a new alterative, but did not consider a proposal suggested by the League, MAP, and Sierra Watch. All of the organizations suggested that the project size be reduced with a new point of access for the project. Instead of a new access through SR 267 to the Specific Plan, the project proponents would seek an easement to roadway access through Highlands View Drive. This alternative would also include a conservation easement of the Lake Tahoe Basin property where the Brockway campground has been proposed. This alternative would greatly reduce the amount of environmental impacts and provide much more adequate mitigation measures. The League urges that this be considered as a realistic alternative. PF38-11

VI. This FEIR Should Not Be Approved or Certified under CEQA. There Are Not Enough Appropriate Overriding Considerations to Approve FEIR Over Detrimental Environmental Impacts.

This Specific Plan FEIR cannot be certified as it does not meet the necessary CEQA requirements. CEQA only allows for certification of a FEIR after it has been found that the EIR has been completed in compliance with CEQA.[25] The comments provided above detail how the public process has been inadequate and that the FEIR had not conducted a cumulative impact analysis with the Squaw Valley Project, Brockway, and the Area Plan. The NTRAC agreed the public has been ignored and that the FEIR cannot be certified as currently presented, as evidenced by their vote against certification on May 12, 2016. Placer County did not meet CEQA requirements in consulting with TRPA through the DEIR phases of the Specific Plan environmental review process. This FEIR cannot be certified because of its lack of CEQA compliance. PF38-12

The Specific Plan cannot be approved as proposed as the Lake Tahoe Basin traffic impacts were ignored and the FEIR lacks adequate mitigation. CEQA states that a project can only be approved if it will not have significant effect on the environment.[26] The FEIR did not prove through its analysis that there would not be significant impacts to the Lake Tahoe Region because the VMT analysis is arbitrary. The associated mitigation measures relating to traffic impacts to Lake Tahoe are also arbitrary and meaningless. The priceless Lake Tahoe environment cannot be ignored at the sacrifice of the Specific Plan approval.

The BOS could make findings of overriding consideration against environmental harm to approve the project. To do this CEQA requires that the BOS,

---

[24] Final Environmental Impact Report Martis Valley West Parcel Specific Plan. May 2016. Prepared for Placer County by Ascent Environmental. Master Responses. p.3.8.
[25] § 21000 CCR, Title 4, Chapter 3 (CEQA) §15090(a)(1).
[26] § 21000 CCR, Title 4, Chapter 3 (CEQA) §15092(b)(1).

> "... balance, as applicable, economic, legal, social, technological, or other benefits, including region-wide or state-wide environmental benefits, of a proposed project against its unavoidable risks when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits, including region-wide or state-wide benefits, of a proposed project outweigh the unavoidable adverse environmental effects may be considered 'acceptable.'[27]"

PF38-12 cpnt.

The Specific Plan and associated FEIR have ignored public input and have disregarded current planning efforts to improve the Lake Tahoe region by both TRPA and Placer County through the Area Plan. The Specific Plan will likely bring financial gain to the project proponents. Alternatives brought forth by the League, MAP, and Sierra Watch have been ignored. The project will have detrimental environmental impacts to the Martis Valley region and Lake Tahoe. It is unclear as to what benefits the Specific Plan will bring other than financial gain to the project proponents. There is not enough evidence for the BOS to make any overriding considerations to approve this project. The League recommends that the FEIR be denied certification and that the approval of the Specific Plan also be denied.

Recommendations

These comments have detailed concerns with not only the FEIR, but impacts to the Lake Tahoe region. The League recommends that:

- **The FEIR be denied certification as proposed today.**
- **The Specific Plan approval be denied as proposed today.**
- **A true assessment on VMT increase to Lake Tahoe and its associated traffic impacts be completed for the Specific Plan.**
- **Adequate mitigation for traffic be presented through detailed funding mechanisms and transit solutions from the project area to the Lake Tahoe Basin.**
- **Funding mechanisms should include continual and annual contributions. Transit solutions should include continual shuttles from the Specific Plan to Lake Tahoe.**
- **A cumulative traffic impact analysis be conducted for the Specific Plan, Squaw Valley Project, and Brockway. There must be details provided on what this means for the Area Plan environmental review.**
- **Placer County coordinate planning efforts with the TRPA on the Specific Plan, Squaw Valley Project, and Area Plan.**
- **The alternative proposed by the League, MAP, and Sierra Watch be seriously considered.**

PF38-13

Sincerely,
Shannon Eckmeyer
Policy Analyst
League to Save Lake Tahoe

[27] § 21000 CCR, Title 4, Chapter 3 (CEQA) §15093(a).

PF38

Shannon Eckmeyer, Policy Analyst
League to Save Lake Tahoe
June 8, 2016

PF38-1 The comment expresses support for the conservation component of the MVWPSP as well as concerns regarding the environmental consequences of the project to the Lake Tahoe Basin. The comment summarizes issues discussed in the comment letter. Please refer to responses PF38-2 through PF38-13, provided below.

The comment states that the EIR does not meet CEQA requirements and should be recirculated. As addressed throughout the responses to comments in the Final EIR and those included herein, the Draft EIR was prepared in compliance with CEQA and provides a sufficient evaluation of the project's potential environmental effects for the public and decision makers. See response to comment PF13, above and Master Response 1 in the Final EIR.

PF38-2 The comment provides background information regarding the League's engagement in the project, including that prior to modification of the project to remove all portions of the Tahoe Basin from the project site. The original project proposal included 112.8 acres within the Lake Tahoe Basin and would have required preparation of an Area Plan pursuant to codes and regulations of the Tahoe Regional Planning Agency (TRPA).

As described in section 1.5.3 of Chapter 1, "Introduction," of the Draft EIR, the original MVWPSP project site proposed in 2014 included 112 dwelling units (not a campground) on the 112.8 acres within the Tahoe Basin watershed, the site of the currently proposed Brockway Campground. A Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) for Placer County and Environmental Impact Statement (EIS) for TRPA was published in March 2014. A draft Specific Plan was submitted to the County in May 2014, and a draft Area Plan was submitted to the County and TRPA in June 2014. In response to input from agencies, organizations, and members of the public on the 2014 NOP and draft Specific Plan and Area Plan, the applicant revised the MVWPSP proposal to remove all Tahoe Basin lands from the West Parcel and East Parcel. The boundaries of the West and East Parcels are now coincident with the adopted Tahoe Basin boundary line, which is the boundary of TRPA jurisdiction. The revised MVWPSP does not propose any changes to lands within the Lake Tahoe Basin that fall under the jurisdiction of TRPA or its processes. As a result, an Area Plan is no longer part of the proposed MVWPSP, and no TRPA action will be required for the MVWPSP.

PF38-3 The comment alleges piecemealing with regard to the Brockway Campground Project. The MVWPSP Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding concerns related to the separate Brockway proposal.

PF38-4 The comment expresses concern regarding the public review process for the MVWPSP and for cumulative development projects, specifically Squaw Valley and Brockway Campground. MVWPSP, Brockway Campground, and Village at Squaw Valley projects are separate projects proceeding independently. Placer County has met and exceed the legally-required public review periods for the MVWPSP EIR as described in Chapter 1 of the Final EIR. After release of the Final EIR, the MVWPSP Project was heard at the May 12, 2016 NTRAC meeting and the Placer County Planning Commission held hearings on the MVWPSP on June 9, 2016 and on July 7, 2016.

As explained in Master Response 2 in the Final EIR, the Draft EIR includes an assessment of cumulative impacts as outlined in Section 4.2, Cumulative Impact Analysis Methodology. The proposed Brockway Campground as well as the Village at Squaw Valley Specific Plan are included in the list of probable future projects that are in the project vicinity and have the possibility of interacting with the MVWPSP to generate cumulative impacts (see Table 4-2 on page 4-5 of the Draft EIR). The analyses of cumulative effects are included in the separate technical chapters of the Draft EIR.

PF38-5 The comment expresses concerns regarding the public process for the MVWPSP and urges denial of certification of the EIR. Please refer to responses to comments PF38-1 and PF38-4, above.

PF38-6 The comment states that the EIR does not address traffic impacts in the Lake Tahoe Basin. See Master Responses 5 and 6 in the Final EIR. Further, concerns regarding GHGs were also discussed in the Final EIR, please see Master Response 7. The commenter questions the effectiveness of the mitigation measures. See responses to comments PF29-21 through PF29-30.

The comment states that the VMT estimates are understated and refers to Mr. Liddicoat's comments. See responses to comments for responses to Mr. Liddicoat's comments. Most importantly, comprehensive empirical data from a nearby subdivision, Tahoe Donner, provides evidence that the daily and peak hour trip generation estimates in the Draft EIR traffic study are reasonable, and may even overstate the daily and peak hour traffic volumes that would be generated by the project by 50 percent.

PF38-7 The comment expresses that mitigation measures to address project impacts on transit lack specificity and that the impact should be considered significant. Please see response to comment PF29-30.

PF38-8 The comment states that the County did not consult with TRPA during the environmental review process for the MVWPSP. This is not true. Please see response to comment IO18-7 in the Final EIR, which addresses concerns regarding evaluation of impacts to the Tahoe Basin and consideration of TRPA thresholds. Placer County has coordinated with, among other agencies, TRPA and TMPO (see comment letter SA4, from TRPA, in the Final EIR). The Draft EIR was circulated to TRPA, which provided comment on in a letter dated December 22, 2015 (PF38-8 comment states 2016, but the comment letter is dated from 2015). This letter from TRPA, RA1, is responded to in responses RA1-1 through RA1-3 of the Final EIR.

PF38-9 The comment states that the MVWPSP does not address cumulative impacts. This is not correct. The EIR identifies related cumulative projects (see Draft EIR Table 4-2) and evaluates cumulative impacts. As discussed in Master Response 1 of the Final EIR, the Draft EIR contains a thorough and adequate analysis of the potential project-specific and cumulative effects of the proposed project. Where applicable, the Draft EIR addresses impacts pertaining to the broader Truckee-Tahoe region (biological resources, traffic, visual resources, night lighting, air emissions, GHGs, population/employment/housing, wildfire hazards, emergency evacuation, recreation, and associated cumulative impacts). Please also see responses to comments PF38-6, PF37-7, and PF37-8, above.

As noted in the comment, the combined increase in VMT from the Squaw Valley Specific Plan project and the MVWPSP would not cause the TRPA VMT threshold to be exceeded. Therefore, even if the County used the VMT threshold as a standard of significance, the impact would be less than significant and no mitigation would be required (under CEQA,

approaching a significance threshold does not result in a significant impact; rather, a significant impact occurs when a threshold is exceeded).

PF38-10 The comment states that the EIR ignores cumulative impacts associated with the Brockway Campground. Please refer to Master Response 2 of the Final EIR, which addresses such concerns. Please also see Master Response 6 of the Final EIR, regarding VMT.

PF38-11 The comment states that the EIR fails to provide a reasonable range of alternatives. The issues raised in this comment are addressed in Master Response 10, Alternatives, in the Final EIR. The range of alternatives, feasibility of alternatives, and suggested additional alternatives, including alternative site access, are discussed therein.

PF38-12 The comment states that the EIR does not meet CEQA requirements and should be recirculated. See response to comment PF13-2 and Master Response 1 of the Final EIR.

PF38-13 The comment summarizes the key issues of concern from the League to Save Lake Tahoe. Comments regarding preferences for the MVWPSP, Squaw Valley, and Brockway Campground projects will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

From: Stacy Wydra
To: Shirlee Herrington
Cc: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Sydney Coatsworth; Suzanne Enslow
Subject: FW: MVW Project - Lake Tahoe
Date: Wednesday, June 8, 2016 2:23:21 PM
Attachments: image001.png

PF39

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: D Aaron [mailto:dca2319@yahoo.com]
Sent: Wednesday, June 08, 2016 2:13 PM
To: Stacy Wydra
Subject: MVW Project - Lake Tahoe

Dear Placer County Board of Supervisors,

I sincerely hope that the Placer County Board will will reflect deep into their hearts when making a decision on the MVW Ridgeline Project. You all have heard the long list of reasons why this project should not be approved, so no need to repeat them. Suffice to say that this project has the potential to impose significanty permanent, unstable conditions to the Lake Tahoe basin. I love this place and have plans to spend the rest of my life here. Please allow me to hold on to that dream. PF39-1

As an 8+ year full time resident of Incline Village, I strongly object to this project.

Sincerely,
Derrek Aaron
President VouchTree Consulting
Incline Village, NV

PF39

Derrek Aaron
VouchTree Consulting
June 8, 2016

PF39-1 The comment expresses opposition to the project and general concern about the Lake Tahoe Basin. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Physical effects of the proposed project in and around the Tahoe Basin are addressed in the EIR.

From: Stacy Wydra
To: Fran Ruger; Sydney Coatsworth; Suzanne Enslow; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net)
Cc: Shirlee Herrington
Subject: FW: Public Comment on Martis Valley West Parcel Project
Date: Wednesday, June 8, 2016 2:48:11 PM
Attachments: image003.png

PF40

One of two emails to follow from Ms. Borhani.

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Heather Beckman
Sent: Wednesday, June 08, 2016 10:01 AM
To: gmcmaya@gmail.com
Cc: Stacy Wydra; Shirlee Herrington
Subject: RE: Public Comment on Martis Valley West Parcel Project

Hi Maya
I have forwarded (via cc) this comment to the project planner and Environmental Coordination Services.

thanks

Heather Beckman
County of Placer - Community Development Resource Agency
(530) 581-6286 / hbeckman@placer.ca.gov

From: gmcmaya@gmail.com [mailto:gmcmaya@gmail.com]
Sent: Wednesday, June 08, 2016 10:00 AM
To: Heather Beckman
Subject: RE: Public Comment on Martis Valley West Parcel Project

PF40-1

Dear Heather,

Please accept, and submit, these comments to the Planning Commission for their meeting on Thursday, June 9, at Granlibakken Resort and Conference Center.

Dear Members of the Planning Commission,

In regards to the Martis Valley West Parcel Project (MVWPP), and proposed adoption of the Martis Valley West Parcel Specific Plan (MVWPSP), I would respectfully like to submit the following comments: PF40-1 cont.

1. Please vote no to this project in its current configuration. I believe it is not in the best long-range interest of our area (where I have grown up and lived off and on most of my adult life), and will cause too many significant problems that will not adequately be addressed through proposed mitigation plans. In the end, we, the locals, will suffer from increased and untenable traffic and congestion.

Additionally, we would be taking one of our remaining, undisturbed Ridge lines in the Tahoe area and basin, and changing - forever - that stature. We would be fools not to look forward "seven generations" as Indigenous wisdom advises, to see what we think of this area after allowing a development of this size and proportion to occur in what is currently undeveloped open space and forested land.

The rarity, and the value of that, is not to be underestimated.

2. Alternatively, if the Commission would please vote for ALTERNATIVE 1, which would allow No Project-No Development, this would be the best solution for all in this community.

As more than one person has pointed out, the idea of "downsizing" the project, as a concession from the developers that is supposed to make me or anyone else concerned about this project feel better, is sophomoric, at best: the consideration of downsizing automatically concedes that the project, at its proposed scale and conceptual design, is untenable for the land, for the local infrastructure (and to change that, so as to accommodate any of the versions of this proposed project, *would significantly and forever change the nature of our Tahoe community and land and skycaps*), and for the local community of humans who dwell here and love the place as a peaceful, quiet place. PF40-2

The proposed MVWPP is too much. Proposing to compromise the Tahoe Ridge line is particularly offensive to those of us who have grown up with these vistas and views. Any alternative other than #1 may propose that "smaller" is better; but over time, the precedent of development will take over, and what we have cut into at all, will eventually erode further away. Look at history in this region (or anywhere), and you will see this to play out time and time again.

This is an open area, undeveloped, currently unstressed by human and developmental concerns. Don't we deserve at least ONE SIGNIFICANT area, parcel, in our community that maintains, and honors and respects, the value of such land, in the larger scheme of land management and human dwelling in an ecosystem? There are signs of environmental stress everywhere within and around the Lake Tahoe basin. Could we not please leave one area alone, and NOT convert an area that currently remains unstressed?

PF40-2
cont.

Yours, most gratefully,

Maya Borhani

Maya T. Borhani
Freelance Writer and Educator
4070 N. Lake Blvd.
Carnelian Bay, CA. 96140

Adjunct Instructor, Lake Tahoe Community College
M.A., Language and Literacy Education
Specializations: Poetic Inquiry; Indigenous Language Revitalization
University of British Columbia, Vancouver, 2013

www.linkedin.com/pub/maya-trace-borhani/33/7ba/365
http://poetmayabel.wordpress.com
https://independent.academia.edu/MayaTracyBorhani

From: Stacy Wydra
To: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Shirlee Herrington; Suzanne Enslow; Sydney Coatsworth; Fran Ruger
Subject: FW: Correction to comment letter (typo)
Date: Wednesday, June 8, 2016 2:48:45 PM
Attachments: image003.png

2 of 2 from Ms. Borhani.

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Heather Beckman
Sent: Wednesday, June 08, 2016 10:23 AM
To: gmcmaya@gmail.com
Cc: Shirlee Herrington; Stacy Wydra
Subject: RE: Correction to comment letter (typo)

I have forwarded this correction.

Heather Beckman
County of Placer - Community Development Resource Agency
(530) 581-6286 / hbeckman@placer.ca.gov

From: gmcmaya@gmail.com [mailto:gmcmaya@gmail.com]
Sent: Wednesday, June 08, 2016 10:08 AM
To: Heather Beckman
Subject: Correction to comment letter (typo)

Stupid auto correct, turned the word "skyscapes" into "skycaps" -

It's in italics, in the paragraph AFTER numbered point # 2 - it's supposed to read "land and skyscapes." PF40-3

A small concern - but if you had time to pencil in the change?

Thanks.

And thanks for getting me the info/answers to my questions - I haven't gone over it all yet, but saw it there.
I REALLY appreciate it, especially as I'm playing catch-up on these items, and especially as the request was so utterly last minute.

You make a person feel like they have good public representation. Thank you, Heather, for everything you do.

All best,

Maya

PF40-3 cont.

Maya T. Borhani
Freelance Writer and Educator

Adjunct Instructor, Lake Tahoe Community College
One College Drive
South Lake Tahoe, CA. 96150
Speech & Communications; English
Incarcerated Student Program, English

M.A., Language and Literacy Education
Specializations: Poetic Inquiry; Indigenous Language Revitalization
University of British Columbia, Vancouver, 2013
B.A., English and Mass Communications
University of California, Davis, 1982

mborhani@mail.ltcc.edu
www.linkedin.com/pub/maya-trace-borhani/33/7ba/365
http://poetmayabel.wordpress.com
https://independent.academia.edu/MayaTracyBorhani

PF40

Maya T. Borhani
June 8, 2016

PF40-1 The comment expresses opposition to the project and general concern about the Lake Tahoe Basin. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Traffic and congestion impacts are addressed in Chapter 10, "Transportation and Circulation," of the Draft EIR. Potential effects on the Basin ridgeline are addressed in Master Response 4 in Chapter 3, "Comments and Responses," of the Final EIR.

PF40-2 The comment expresses a preference for Alternative 1, the No Project-No Development Alternative. Comments regarding preferences for a project alternatives will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF40-3 The comment notes a correction in the commenter's previous correspondence. The original correspondence has not been altered, but the correction from "skycaps" to "skyscapes" is noted.

From: Stacy Wydra
To: Shirlee Herrington
Cc: Fran Ruger; Sydney Coatsworth; Suzanne Enslow; Kurt Kneg (kkneg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net)
Subject: FW: Scale back Martis West
Date: Wednesday, June 8, 2016 2:51:47 PM

PF41

MVWPSP Correspondence

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

-----Original Message-----
From: Jan Ellis [mailto:jantahoe@gmail.com]
Sent: Wednesday, June 08, 2016 10:32 AM
To: Stacy Wydra
Subject: Scale back Martis West

I'm unable to attend the meeting on June 9th in which The Martis West proposal will be before the board. However, I wish to express my opinion to the Placer Co. Supervisors. My number one concern is the traffic and evacuation impact that seems to continue to be swept under the rug. The reality of traffic gridlock in the summer continues to increase and the carrying capacity at peak season (July and August) needs to be a major factor in approving all the projects coming down the pipe. With the growing number of dead and dying trees in the basin it is not a question of if But when a catastrophic fire causes an emergency evacuation for residence and tourist alike. Our existing roads can not handle both emergency vehicle needs and the string of cars that will be at a stand still. The reality of a cahotic and potentially deadly scenario needs to be taken seriously. Call me paranoid but if and when my greatest fear comes to pass, I will hold every board member who approves this project "as is" responsible for not taking the risk seriously. Please DENY the proposed development and send them back to the drawing board to come up with a scaled down project that still includes the work force housing component. PF41-1

Sincerely,
Jan Ellis
PO Box 352
Crystal Bay, NV. 89402

PF41 Jan Ellis June 8, 2016

PF41-1 The comment expresses opposition to the project and concern about traffic and emergency evacuation. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. Traffic and congestion impacts are addressed in Chapter 10, "Transportation and Circulation," of the Draft EIR.

From: Stacy Wydra
To: Shirlee Herrington; Kathi Heckert; Paul Thompson; EJ Ivaldi
Cc: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Sydney Coatsworth; Suzanne Enslow
Subject: FW: Comments - MVWPSP EIR and Placer Co. Staff Report
Date: Wednesday, June 8, 2016 7:27:45 PM
Attachments: image003.png
SWC comments - Martis Valley West EIR.doc

PF42

Additional correspondence received.
I have made copies for the Commissioners and staff and will bring with me tomorrow.
Thanks!
Stacy

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Sherry Guzzi [mailto:sierrawildlifecoalition@gmail.com]
Sent: Wednesday, June 08, 2016 7:00 PM
To: Stacy Wydra
Cc: Ann Nichols
Subject: Comments - MVWPSP EIR and Placer Co. Staff Report

June 8, 2016

Placer County Community Development
Resource Agency
c/o Stacey Wydra <swydra@placer.ca.gov>
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Martis Valley West (MVWPSP) final EIR and Placer County Staff Report

PF42-1

The Martis Valley West PSP final EIR and the Placer County Staff Report are both full of misleading (at best) obfuscations. Transferring development from 760 acres on the east of SR 267 to 662 acres on the ridge west of SR 267 does NOT preserve all 6,376 acres in the east

parcel; it only saves the 670 acres transferred. The rest of the east parcel is already open space, and NOT zoned for development, so the use of the entire east parcel for comparison of impacts is invalid. The Placer County staff's "statement of overriding consideration" to dismiss environmentally superior alternatives to this project based on 'saving' the entire east parcel is therefore baseless and wrong.

PF42-1 cont.

The assumptions for Alternative 2 are also false. The entire 1,360 residences theoretically allowed on the east 670 acres would never, ever be built – there is no market for them, and everybody knows that. Additional problems in the EIR include modifying all required mitigations with "wherever feasible", "greatest extent possible", and "except where unavoidable", which all create huge loopholes, as do the words "safety and security" under lighting. And the statement under lighting that "interior lighting be designed to prevent light spilling outdoors" is utter nonsense – expensive houses will have large glass area, and light, surprise, goes through glass.

Besides the misleading comparisons and assumptions, and the unacceptable impacts to traffic and safety, we believe that the impacts to our public forest and wildlife are NOT insignificant, and cannot be mitigated. Please see our Dec. 2015 letter, attached.

7-1) Development on the west ridge would disrupt an important and irreplaceable wildlife corridor, from west to east wilderness areas, and north to south over the ridge. Wildlife has been pushed uphill of developed areas, to the ridges, as we have observed walking that forest area for 36 years.

PF42-2

7-2) Proposed 'compensation' for loss of sensitive wetlands or riparian areas with a 'contribution' to a wetland bank elsewhere will not mitigate the loss of already scarce water resources here.

7-5) Proposed mitigation measures for yellow warbler, olive-sided flycatcher, long-eared owl, bats, and mountain beavers are totally inadequate, and all are modified with "to the extent feasible", which in reality means even token measures will not happen.

Additionally, none of the "species of concern" identified in a September 2012 Assessment of Conservations Values – Martis Valley Opportunity by Conservation Biology Institute were even mentioned in this EIR. Development on the west parcel would be closer to and would be more disturbing to all species noted (Spotted Owl, Northern Goshawk, and Pine Marten). Cumulative Impacts (7-6, 7-7, and 7-10) would be significant, not just to special-status wildlife (as admitted in 7-10), but to all wildlife, which will be disturbed and displaced, and ultimately killed as their habitat is destroyed.

Finally the revised EIR actually *deleted* the objective of the "county to promote efficient use of land and natural resources and … encourage 'in-fill' development", stating the change was "for clarity". Clearly this development is the opposite of all good planning principles supposedly promoted by Placer County and other local agencies, which would be 'in-fill' development in existing developed areas, and never an isolated development in open and undisturbed forest land. The revised EIR also states that alternate, emergency access through Northstar to the west parcel is not possible, because the developer does not control the property in-between the two. So not only is the west parcel not even adjacent to Northstar property, but also the closest Northstar areas are the undeveloped cross-country ski area and fishing pond, with no existing utilities or other amenities.

PF42-3

This 'final' EIR for MVWPSP does not even address their proposed adjacent 550 space

PF42-4

campground, which would add significantly to all the "significant and unavoidable" impacts to traffic, safety, and the environment. Placer County would be totally abdicating their responsibility to our citizens, visitors, forests and wildlife to approve this project. PF42-4 cont.

Very sincerely,

Sherry Guzzi
Sierra Wildlife Coalition
PO Box 7763, Tahoe City, CA 96145
phone 530-583-9573 or 530-320-9923

PF42

Sherry Guzzi
June 8, 2016

PF42-1 The comment suggests that statements related to preserving the 6,376-acre East Parcel are not correct because only 670 acres of the East Parcel are zoned for development, and raises other concerns related to the assumptions of Alternative 2, lighting effects, and mitigation language. The comment is similar to and essentially repeats portions of comments I042-1 and I042-4 on the Draft EIR. Please see responses to comments I042-1 and I042-4 in the Final EIR.

PF42-2 The comment states that proposed development on the West Parcel would disrupt an important wildlife corridor; it also asserts that proposed mitigation for impacts on sensitive habitats and special-status species are inadequate. Additionally, the comment claims that none of the species of concern identified in *Assessment of Conservation Values, Martis Valley Opportunity East and West Parcels* (CBI 2012) were evaluated in the EIR. The comment is similar to and repeats portions of comments I042-2, -3, -4, -5, and -6 on the Draft EIR. Please see responses to those comments in the Final EIR.

PF42-3 The comment notes that the objective pertaining to promoting infill development was deleted in the Final EIR. See response to comment I051-17. The objective pertaining to infill was to alleviate confusion. The project does not meet the requirements of a specific definition of infill in the State CEQA Guidelines that would render a project exempt from CEQA. MVCP Policy 1.A.1 was included in the project objectives because, as discussed under Draft EIR Impact 5-1, "Alteration of present or planned land uses," on page 5-19, the land use changes proposed by the MVWPSP would shift development potential from the East Parcel to the West Parcel, which is closer to existing developed areas in the Northstar Resort community.

PF42-4 The comment raises concerns related to the Brockway Campground. As explained in response to comment I018-62 and Master Response 2 in the Final EIR, the Brockway Campground Project is a separate proposal for which project-specific environmental review will be required and has not yet commenced. The Draft EIR considers the campground in the cumulative analysis.

Subject: DENY Martis Valley West/Placer County

From: Mary Hartnett (maryhartnett01@yahoo.com)

To: jenmonten@placer.ca.gov; bos@placer.ca.gov; swydra@placer.ca.gov;

Cc: planning@placer.ca.gov;

Date: Wednesday, June 8, 2016 7:12 PM

Speaker #5

To: Jennifer Montgomery, Placer County Board of Supervisors, District 5
Placer County Board of Supervisors
Placer County Planning Commission
and Staff

PF43

Re: Martis Valley West/Placer County

I encourage, urge, recommend, request, and beg that in the interest of the residents and visitors of Placer County that you DENY the Martis Valley West planned project adjacent to Brockway Summit, Eastern Placer County. By allowing ridgeline development in a wilderness area. you are destroying the "Crown Jewel" of Placer County: Lake Tahoe. The 662 acres planned for development will eliminate the clear bright night sky with light pollution; brilliant skies are one reason why citizens live at Lake Tahoe and visitors come to experience. It will displace animals from their natural habitat; admiring and viewing natural flora and fauna along the north ridgeline of Lake Tahoe is another reason for living at and visiting Lake Tahoe. 760 residential addresses and 6.6 acres of commercial enterprises will cause our single road around Lake Tahoe and three basin entrance/ exit roads on the North Shore to become even more saturated with traffic EVERY DAY of the year! Just like any metropolitan area Anywhere USA. PF43-1

Why will citizens wish to live in or visit the scenic wonders of Lake Tahoe when they are stuck in stand still traffic just like "back home" in urban sprawl? Highway 28 and 267 are already saturated with vehicles many days and evenings year round! How will citizens inside the basin be able to escape or flee a catastrophic event such as wildfire when Hwy 28 (North Lake Blvd.), Hwy 267 (North Shore Blvd.), and Hwy 89 South are "parking lots"?

760 destination doorways will have two (most likely) vehicles travelling to and from their Brockway Summit address several times a year, several times a month, several times a week, and on many occasions several times a day! Out to recreate in the wilderness and shoreline beauty of Lake Tahoe, attend events, visit friends, receive family and guests, shop for supplies, acquire medical attention, and more! Even if all 760 destination doorways are not in use, the residences/property (and the establishments in the commercial sector) will need landscaping maintenance; house keeping; carpet care; alarm system service; US Mail, UPS, Fed Ex delivery and pick up; furniture and supplies delivery and pick up; utility meter readers; trash collection; snow removal equipment to and from the property. A multitude of vehicle trips to and from each address multiple times on any day and night! What about emergency services such as fire protection, paramedics, and etc. PF43-2

I am not opposed to development; in fact, I began my real estate career 30 years ago employed by a developer at projects on the West Shore and in Squaw Valley.

As the managers and stewards of Placer County's resources, I implore you to retain the scenic wonders around and within Lake Tahoe for now and future generations! PF43-3

Thank you, Marynell Hartnett, since 01/01/1983 a full time Placer County resident, taxpayer, registered voter.
Kings Beach, 96143

From: Stacy Wydra
To: Shirlee Herrington; Kathi Heckert; Karin Schwab; Paul Thompson; EJ Ivaldi; Stephanie Holloway; Amber Conboy
Cc: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Sydney Coatsworth; Suzanne Enslow; Fran Ruger
Subject: FW: DENY Martis Valley West/Placer County
Date: Wednesday, June 8, 2016 7:28:45 PM
Attachments: image003.png

Additional correspondence.
Will also bring copies tomorrow.
Thanks!
Stacy

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Mary Hartnett [mailto:maryhartnett01@yahoo.com]
Sent: Wednesday, June 08, 2016 7:13 PM
To: Jennifer Montgomery; Placer County Board of Supervisors; Stacy Wydra
Cc: Placer County Planning
Subject: DENY Martis Valley West/Placer County

To: Jennifer Montgomery, Placer County Board of Supervisors, District 5
Placer County Board of Supervisors
Placer County Planning Commission
and Staff
Re: Martis Valley West/Placer County

I encourage, urge, recommend, request, and beg that in the interest of the residents and visitors of Placer County that you DENY the Martis Valley West planned project adjacent to Brockway Summit, Eastern Placer County. By allowing ridgeline development in a wilderness area. you are destroying the "Crown Jewel" of Placer County: Lake Tahoe. The 662 acres planned for development will eliminate the clear bright night sky with light pollution; brilliant

skies are one reason why citizens live at Lake Tahoe and visitors come to experience. It will displace animals from their natural habitat; admiring and viewing natural flora and fauna along the north ridgeline of Lake Tahoe is another reason for living at and visiting Lake Tahoe. 760 residential addresses and 6.6 acres of commercial enterprises will cause our single road around Lake Tahoe and three basin entrance/ exit roads on the North Shore to become even more saturated with traffic EVERY DAY of the year! Just like any metropolitan area Anywhere USA.

Why will citizens wish to live in or visit the scenic wonders of Lake Tahoe when they are stuck in stand still traffic just like "back home" in urban sprawl? Highway 28 and 267 are already saturated with vehicles many days and evenings year round! How will citizens inside the basin be able to escape or flee a catastrophic event such as wildfire when Hwy 28 (North Lake Blvd.), Hwy 267 (North Shore Blvd.), and Hwy 89 South are "parking lots"?

760 destination doorways will have two (most likely) vehicles travelling to and from their Brockway Summit address several times a year, several times a month, several times a week, and on many occasions several times a day! Out to recreate in the wilderness and shoreline beauty of Lake Tahoe, attend events, visit friends, receive family and guests, shop for supplies, acquire medical attention, and more! Even if all 760 destination doorways are not in use, the residences/property (and the establishments in the commercial sector) will need landscaping maintenance; house keeping; carpet care; alarm system service; US Mail, UPS, Fed Ex delivery and pick up; furniture and supplies delivery and pick up; utility meter readers; trash collection; snow removal equipment to and from the property. A multitude of vehicle trips to and from each address multiple times on any day and night! What about emergency services such as fire protection, paramedics, and etc.

I am not opposed to development; in fact, I began my real estate career 30 years ago employed by a developer at projects on the West Shore and in Squaw Valley.

As the managers and stewards of Placer County's resources, I implore you to retain the scenic wonders around and within Lake Tahoe for now and future generations!

Thank you, Marynell Hartnett, since 01/01/1983 a full time Placer County resident, taxpayer, registered voter.

Kings Beach, 96143

PF43

Mary Hartnett
June 8, 2016

PF43-1 The comment expresses opposition to the project, citing concerns related to wildlife, vegetation, night skies, and traffic. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF43-2 The comment expresses concerns related to traffic on SR 267 and emergency evacuation. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR 10, “Transportation and Circulation,” as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation.

PF43-3 The comment urges the County to retain the scenic areas around Lake Tahoe. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

From: Stacy Wydra
To: Shirlee Herrington
Cc: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Suzanne Enslow; Sydney Coatsworth
Subject: FW: Housing Sprawl
Date: Wednesday, June 8, 2016 2:46:34 PM
Attachments: image003.png

PF44

MVWPSP Correspondence

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Steve Pearsall [mailto:pearsalltahoe@gmail.com]
Sent: Wednesday, June 08, 2016 9:20 AM
To: Stacy Wydra
Subject: Housing Sprawl

Dear Ms. Wydra,

There is one concern that may not have been emphasized among the many you have been peppered with concerning the Martis Valley West project. Most of the people living here in the lake basin and over to Truckee do not want this project to proceed. Should not the Placer County government respond to the people they represent and not a select few from Colorado and elsewhere? PF44-1

Sincerely,

Steve Pearsall
Crystal Bay

PF44 Steve Pearsall June 8, 2016

PF44-1 The comment suggests that most people in the region are opposed to the project and that the County should be responsive to those people. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF45

Regarding decisions to allow Martis West development and Brockway Campground developments.

To the Placer County Board of Supervisors and Placer County Planning Commissioners,

Please deny the request of the developers and their proposal to develop any of the lands in the upper Martis Creek watershed and the Tahoe ridgeline abutting that area.

As you know there are many reasons why this should not be developed. Watershed, animal life, forest and tree greenspace, traffic, fire danger, air quality, night light pollution, wasted development for expensive homes used seldom, the opulent opinion that humans can waste what no other animals on the earth will do, a small addition to green-house effects of cumulative developments by humans, in essence the world wide problems on a local scale.

There are only a few reasons to develop it: They all represent what is bad about humanity and the greed of humans in nature. Money. And excess. Money for the county, money for the developer. There are absolutely no other redeeming benefits. That is about it. Basic. Not rocket science. PF45-1

We also know how the "system" is gerrymandered and designed to push the decision makers towards the goal of allowing continued development. Your staff is the team. The hoops are set up, the actors jump high enough, and they force YOU to say ok. Even though in your heart you know it isn't good, it isn't needed: it is bad. You know that the overriding concerns really can't be mitigated and they do have real effects. You know that if this were put to a public vote it would be turned down almost unanimously. You know this. And the system puts you in the position of GOD.

So be a good GOD. I ask you to step outside the box the developers have put you in and just say no. Just say no. Tell the county that we can live within our means and just say no. Thank you for making the harder choices.

Yours truly, signed: a consortium of several squirrels, 7 bears, 20 lizards, 13 raccoon families, and many magnificent pine and fir trees who can't run away.

PF45

Animal Consortium
June 9, 2016

PF45-1 The comment expresses opposition to the project, citing concerns related to wildlife, vegetation, night skies, and traffic. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

From: Stacy Wydra
To: Kathi Heckert
Cc: Shirlee Herrington; Karin Schwab; Paul Thompson; EJ Ivaldi; Sydney Coatsworth; Fran Ruger; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net)
Subject: FW: Martis Valley Debacle
Date: Thursday, June 9, 2016 6:31:59 PM
Attachments: image003.png

PF46

Correspondence

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Ron Barraclough [mailto:rbarraclough@earthlink.net]
Sent: Thursday, June 09, 2016 7:05 AM
To: Stacy Wydra
Subject: Martis Valley Debacle

As an over 40 year part time and full time resident of Carnelian Bay, I wish to express my total and complete rejection of the Martis Valley proposal. It is idiotic to think that this developer's attempt to further create problems in the Basin has even reached this point and is being considered for approval. I for one, can speak for ALL of my local friends and neighbors who are violently opposed to to the campground debacle and unable to be here to voice their opinions. PF46-1

This proposal is a huge mistake and will bring nothing but more traffic, fire concerns, and environmental chaos to a beautiful area already threatened by over-saturation. And who is really to gain? Certainly not those of us who pride ourselves as lovers of Lake Tahoe, but all for a developer's greed and gain! Please kill this proposal once and for all. Leave the area in question alone before it's too late!! We're running out of space and that is exactly why those of us opposed to this project so NO, NO, NO!!!!!

Ron Barraclough
4999 Flick Street
Carnelian Bay, CA 96140

PF46

Ron Barraclough
June 9, 2016

PF46-1 The comment expresses opposition to the project, citing concerns related to environmental impacts, fire hazards, and traffic. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF47

My name is Joy Dahlgren. My family has had a cabin in Crystal Bay since 1950, and I have visited Lake Tahoe every year since then. Before I retired I spent over 25 years as a transportation planner and researcher, most recently at the Institute of Transportation Studies at the UC Berkeley. I have a bachelor's degree in Statistics, a master's degree in Public Policy, and a Ph.D. in Civil engineering, all from Berkeley. PF47-1

As a long time visitor to Lake Tahoe I am very aware of the steady pressure to profit from its unique beauty and the accompanying danger that over-development will destroy much of what makes it beautiful. Although Martis Valley is outside the Tahoe basin, much of its appeal is related to the lake and as a result it has and will have significant impacts on the lake and the lake on it.

The Martis Valley West project's location on Highway 267 is a major reason that it is a bad idea. During peak vacation time a high proportion of the project's residences would be occupied and a large number of people would be traveling to and from Lake Tahoe. It is the nature of delay that as a road becomes more congested, each additional trip has a larger effect than the previous trip on delay because more travelers are affected and the number of cars that must travel through each bottleneck increases, thus taking each car longer to get through. So a small number of additional trips can cause large increases in delays. This aspect of delay was not analyzed in the EIR.

Why does this delay matter? Because it would affect so many people. With long delays they are not escaping urban pressures, but finding new pressures where they go to get away. They are losing precious

vacation time and the mountain experience becomes more like the urban experience they are traveling to the mountains to escape. PF47-1 cont.

Who benefits from the project? Mainly the developers and the people who occupy the 760 residences of which an average of 80% would be unoccupied.

The benefits seem quite paltry relative to the costs. Why should a change in use be approved? Martis Valley West should remain a timber production zone. Forests have been called the lungs of the world because they absorb carbon, thus reducing greenhouse gases. They also provide lumber. PF47-2

2 minutes 29 seconds.

PF47 Joy Dahlgren
June 9, 2016

PF47-1 The comment expresses concern regarding traffic congestion in the project area. Please refer to Chapter 10, "Transportation and Circulation," of the Draft EIR and Master Response 5 in Section 3.1.5 of the Final EIR, which address these concerns.

PF47-2 The comment expresses opposition to the project, citing concerns related to timber production zone. The conversion of TPZ is evaluated in Chapter 5, "Land Use and Forest Resources," of the Draft EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. As discussed in Chapter 5 of the Draft EIR, the proposed project would result in a net increase of 8 acres zoned TPZ.

PF48

More reading from your state government:

The Cortese-Knox-Hertzberg Government Reorganization Act of 2000

Legislative Findings and Declarations

56001. The Legislature finds and declares that it is the **policy of the state to encourage orderly growth and development** which are essential to the social, fiscal, and economic well-being of the state. The Legislature recognizes that the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open-space and prime agricultural lands, and efficiently extending government services. PF48-1

The Legislature also recognizes that providing housing for persons and families of all incomes is an important factor in promoting orderly development.

56301. Among the **purposes of a commission** are discouraging urban sprawl, preserving open-space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances.

Yours, Sue Daniels

USFS Forester: *experience in forest and watershed protection.*

California Licensed Real Estate Agent: *understands market and needs.*

Board member: *understands process and coercion of staff and laws to set policy even when it is possibly wrong.*

PLACER COUNTY
DATE RECEIVED
JUN 09 2016
PLANNING
COMMISSION
Sue Daniels

PF48 Sue Daniels
June 9, 2016

PF48-1 The comment provides information on the Cortese-Knox-Hertzberg Government Reorganization Act of 2000 regarding orderly growth. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF49

Dear committee, we live near Martis valley. I am eight years old. If you build 750 houses next to us, it will be noisey. When I go outside, PF49-1 I don't want to hear noise, I want to hear the trees, winds and the birds. It will be all stinky and ~~polla~~ polluted in the air and in the lake. It will destroy Gods forest and nature. I won't be able to see the stars any more because of the lightpollution. Please vote no. thank you.

Sincerely,
Gabi

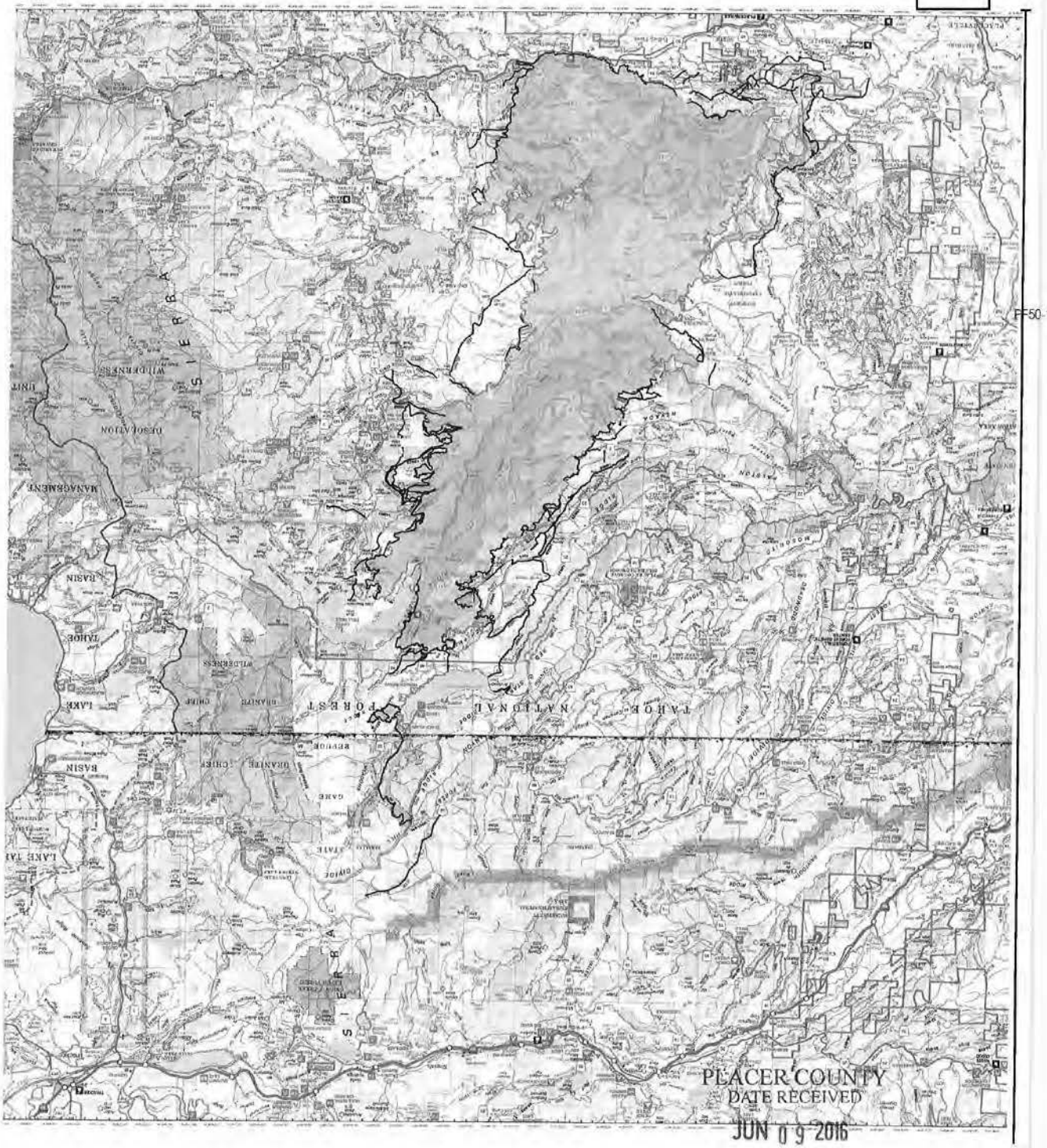
PLACER COUNTY
DATE RECEIVED
JUN 09 2016
PLANNING
COMMISSION
Gabi

PF49

Gabi
June 9, 2016

PF49-1 The comment expresses opposition to the project, citing concerns related to noise, air pollution, water quality, and night skies. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

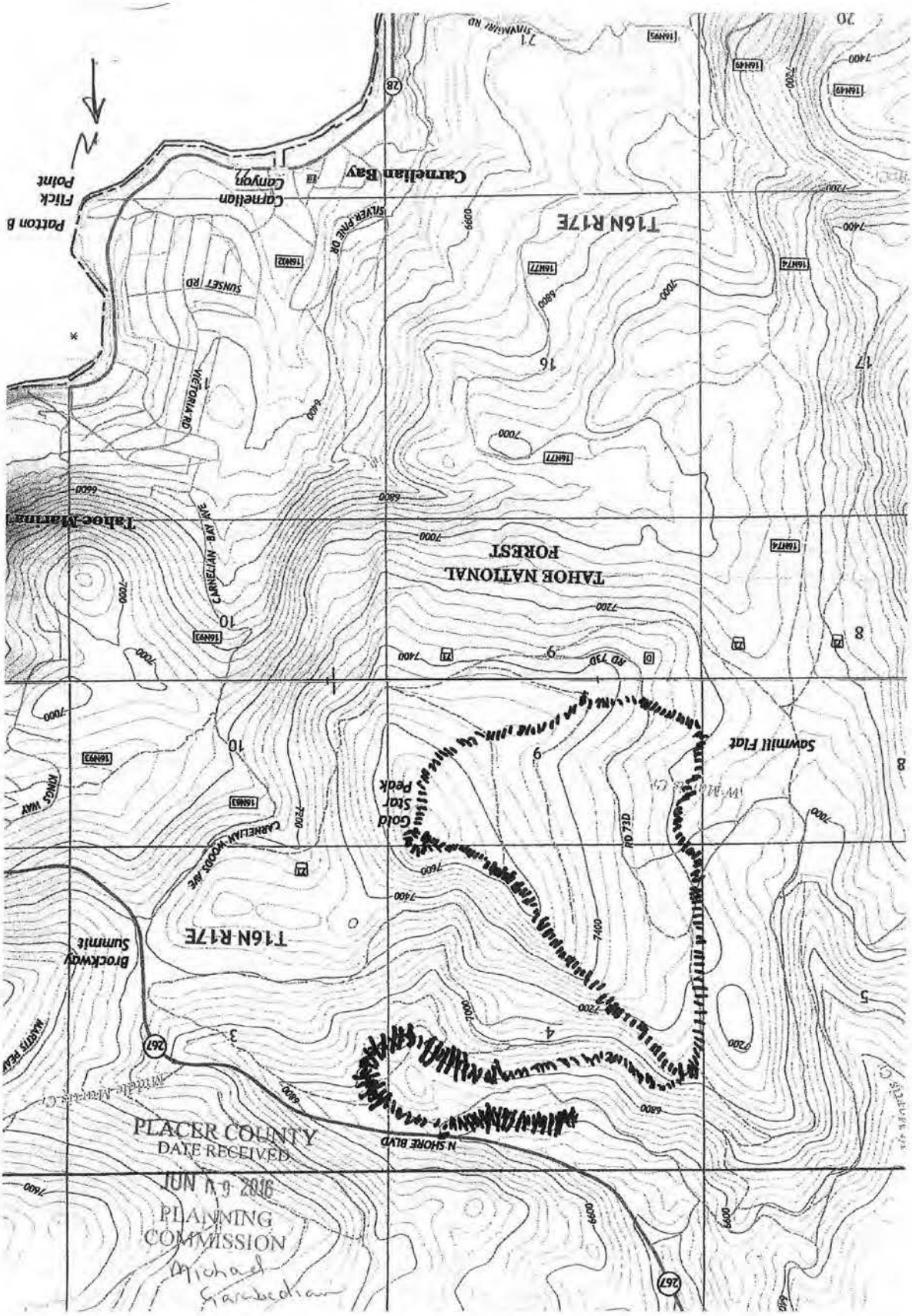
PF50

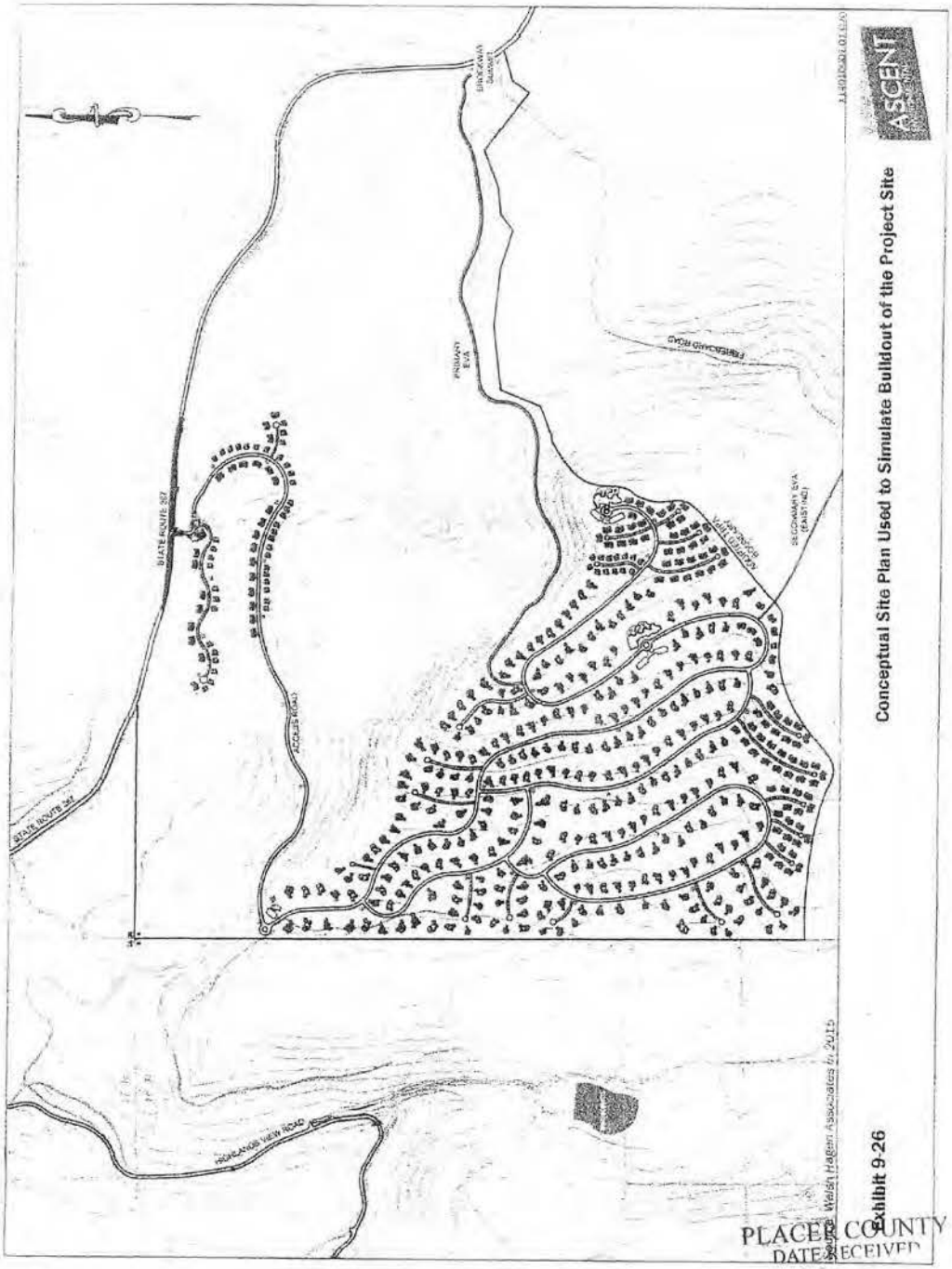


PF50-1

PLACER COUNTY
DATE RECEIVED
JUN 09 2016
PLANNING
COMMISSION
Michael Garabedian

PF50-1
cont.


Kings Beach 1 → Marks Peak Crest map 2015
Sawmill Flat
Gold Star Peak
TAHOE NATIONAL FOREST
T16N R17E
Brockway Summit
Carnelian Bay
Carnelian Canyon
Patton & Flick Point
Tahoe Marina
PLACER COUNTY
DATE RECEIVED
JUN 09 2016
PLANNING COMMISSION
Michael Garabedian



PF50-1 cont.

PLACER COUNTY
DATE RECEIVED
JUN 09 2016
PLANNING COMMISSION
Michael Garabedian

PF50

Michael Garabedian
June 9, 2016

PF50-1 The comment involves three maps submitted to the Planning Commission. No specific comments regarding the EIR are expressed; therefore, no response can be provided.

From: Stacy Wydra
To: Kathi Heckert
Cc: Shirlee Herrington; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Sydney Coatsworth; Paul Thompson; EJ Ivaldi
Subject: FW: Martis Valley West Project
Date: Thursday, June 9, 2016 6:02:07 PM

PF51

Additional correspondence received this morning.
Thanks!
S.

Stacy Wydra
==========

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

-----Original Message-----
From: Sally [mailto:singingceramicist@gmail.com]
Sent: Thursday, June 09, 2016 9:18 AM
To: Stacy Wydra
Subject: Martis Valley West Project

Saving 6000 acres in Truckee is NOT worth losing our ability to evacuate safely in case of a fire and general traffic gridlock in Tahoe and Truckee!!!!!! ~ Sally Hammel PF51-1

PF51 Sally Hammel June 9, 2016

PF51-1 The comment expresses concern regarding traffic congestion in the project area. Please refer to Chapter 10, "Transportation and Circulation," of the Draft EIR and Master Response 5 in Section 3.1.5 of the Final EIR, which address these concerns.

The comment expresses opposition to the project, citing environmental impact concerns. Project impacts and the proposed conservation of the East Parcel are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF52

Placer County Planning Commission re Martis Valley West Parcel Specific Plan

Laurel Lippert, longtime Truckee resident

It's about money, isn't it?

Do you know what money can't buy? Exquisite natural beauty, serenity and the realization that you have found one of the best places in the world to call home.

If you do live here fulltime, you may be raising children and imagine that someday your grandchildren will enjoy visiting you, maybe even living here, too, in this gorgeous place we call home.

PF52-1

I have lived in Truckee for 40 years; my husband Tom has lived in Tahoe and Truckee for 49 years. We have seen many changes in that time, some of them good. But what is most frightening to us is that you will keep saying yes to pressure from developers that will ravage Tahoe, and we'll never get it back.

If this project is approved, the people who will come here, part-time, full-time, guests, employees, contractors, business-owners, will travel on our limited roadways by cars and trucks, coming and going forever. We will spend our time sitting in Tahoe and Truckee traffic jams, just like in the Bay Area.

Have you been in the Bay Area lately? Surrounded by drivers who are crazed by the traffic and mad at the world? And that's not just at rush hour or weekends, it's all the time. And that's what will happen here because we don't have the roads to accommodate more people.

Because of our mountain geography and geology, there are NO options to our existing roadways…no expansions, no bypasses, no backroads, no bridges are possible or desirable. There is NO place to go.

The Martis Valley West Parcel proposal purports to conserve and preserve natural open space and resources, using words like minimize, limit, reduce and protect when, in reality, it will be adding, growing and building more.

The developers want to give us something that we already have. It's not unlike saying to a beautiful healthy strong young man or woman, "I am not going to cut off both your arms and legs, just one of each. I'll even let you pick which limb you would like to keep." PF52-1 cont.

760 units and commercial businesses with employees. Even with second homeowners and renters, you'll have at least 1,500 car/truck trips daily to Truckee and Kings Beach and beyond. Longtime and fulltime residents like Tom and me know not to drive anywhere in Tahoe on holidays or busy weekends or high-season summer days. But it could be year-round, every single day that we can't get to places we love and came here for, because of traffic.

Your legacy could be great if you just say NO, because you want to save this breathtaking place from becoming overcrowded and overrun, sucking the life out of this natural wonder we call home.

Please don't sell us out. Vote NO so we won't have to cry one day, "Where or where has our beautiful Tahoe gone?"

Thank you for your time and service.

PF52

Laurel Lippert
June 9, 2016

PF52-1 The comment expresses opposition to the project, citing concerns related to noise, air pollution, water quality, and night skies. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF53 Robert Schladale

Overall, I want to commend your staff for the tremendous amount of work they had to do in putting together their report. Their report and the CEQA Findings of Fact are clear and readable. However, to me the conclusions and recommendations are at odds with the facts and information presented.

The staff report and CEQA documents indicate that the Project will result in significant and unavoidable impacts to Visual Resources, including light and glare. The LOS of SR 267 will fall to level F at time, and circulation on the North Shore will be worsened; GHGs will increase and other air quality impacts will occur. There will be increased fire danger and potentially severe impacts on emergency response and evacuation. SR 267 is the only way out of the basin. PF53-1

There are several options to reduce project impacts. One is to require that no development occur on or near the ridgeline, even if the full project is approved.

Another option would be to approve Alternative 3, the reduced density option. The developers assert that this would be uneconomic because of the fixed costs associated with the project. This is disingenuous. Shorter roads and reduced utility infrastructure would reduce costs.

Yet another option is Alternative 5, which would keep development in the East Parcel, as currently authorized. This would substantially mitigate most of the impacts associated with the proposed Project, particularly with respect to traffic, fire response, evacuation and visual impact. The staff's main objection to this option is that it would prevent the entire East parcel from being set aside for open space. However, even if all 1360 housing units were developed, they'd only occupy 10% of the acreage. Ninety percent would remain open space. If a reduced density were approved, as much as 97% of the land would remain open space.

With respect to the affects on wildlife, the CEQA document asserts that the West parcel contains no significant wildlife corridors. This is misleading. In fact, the West parcel occupies a crucial area because it provides open space between Northstar and the North Shore of Lake Tahoe. Filling that area with houses would affect the territory of the wildlife living there, and would likely increase the number of human/wildlife interactions in those communities. PF53-2

Clarity is needed with respect to the developers intentions with regard to the campground previously included in the plan. Unless that is dropped completely and permanently, it isn't possible to make an informed decision on this proposal. With the campground, the impacts would be much greater, particularly the fire risk. PF53-3

In summary, I would ask you to reject the proposed CEQA Findings of Fact and Statement of Overriding Considerations for the simple reason that the very significant impacts of the proposed project are not outweighed by its benefits. The only real benefit is the preservation of the entire East parcel for open space, and I've already pointed out that 90 percent of the East parcel would remain undeveloped if the existing zoning is retained. All of the other benefits cited in the CEQA document—all of them—would occur in the East parcel, if development were to remain there. In other words, the only benefit of approving the project would be to set aside an additional 670 acres in the East parcel for open space. However, since the same amount would be lost in the West parcel, the net benefit to wildlife—which is the only benefit unique to the project—is zero. Compared to the very significant project impacts, approval just doesn't make any sense. PF53-4

PF53

Robert Schladale
June 9, 2016

PF53-1 The comment notes the significant and unavoidable impacts identified in the EIR and comments on alternatives to reduce project-related costs and impacts. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF53-2 The comment expresses opposition to the project, citing concerns related to wildlife impacts. Biological resource impacts are evaluated in in Chapter 7 of the Draft EIR.

PF53-3 The comment expresses concern regarding the campground proposal. The Brockway Campground Project is a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal.

PF53-4 The comment urges rejection of the CEQA findings and overriding considerations and cites benefits to development of the East Parcel rather than the West Parcel. Alternatives on the East Parcel are evaluated in the EIR.

From: preserve@ntpac.com [mailto:preserve@ntpac.com]
Sent: Wednesday, June 15, 2016 6:40 PM
To: Stacy Wydra; Paul Thompson
Subject: Please distribute to Placer Planning Commission as NTPA Comments-Sierra Sun article

PF54

Ann Nichols
Opinion Sierra Sun

June 14, 2016

PF41-1

Opinion: Will Placer County ignore residents regarding Martis Valley West?

It was a full house . . . around 250 people attended the Placer County Planning Commission meeting at Granlibakken Tahoe on June 9.

Placer County staff requested approval of the contentious Martis Valley West project, which consists of a gated community of 760 units (1,900 new folks at least) and 6 acres of commercial plopped in the forest on top of SR 267.

Never mind that the Truckee Tahoe Airport, Tahoe Area Sierra Club, Mountain Area Preservation, North Tahoe Preservation Alliance, Friends of the West Shore, Sierra Watch and the League to Save Lake Tahoe all requested denial of the project.

Forty members of the public spoke, but only two said they were in favor: the wife of the developer and Eugene Roeder who is a member of the North Tahoe Regional Municipal Advisory Council. Additionally, over 5,000 petition signatures have been collected and delivered, requesting no Tahoe basin or ridgeline development.

To paraphrase:

The meeting lasted 6.5 hours, yet around 100 passionate Tahoe lovers stuck it out the entire time. Yes, it was painful especially when the developer's attorney and other representatives had the final word after public testimony. PF54-1

The spin narrative was continued and they failed to answer the Planning Commission's legitimate concerns: Oh no sir, you won't see Lake Tahoe from 75-foot-tall condominiums on the Tahoe basin boundary line.

Right commissioner, we won't build affordable housing on site, we'd rather contribute money into a fund to build it somewhere else.

The project site isn't appropriate for affordable housing. Absolutely, we will pay into a fund to add two more lanes on SR 267 that is currently inadequately funded. No worries sirs, there is a plan to evacuate the east side of Placer County … everyone leaves on SR 267.

Once again the developer, Mountainside Partners, formerly East/West Partners, downplayed its current additive application for the 550-space adjacent "Brockway Campground." Which, when you add the 550 spaces (870,000 square feet of soil disturbance) to the 760 units (11 million sq. ft. of disturbance) there really is no reduction in potential development.

June 9 was a red flag day for fire danger, and conspicuously absent at the meeting were representatives of the fire departments. The evacuation study by LSC claims 1.3 to 1.5 hours to evacuate the project in case of fire; however the document doesn't consider in the mix if Kings Beach and Incline Village have to evacuate at the same time.

The questionable emergency preparedness study done by Mountainside Partners also claims everyone evacuating will be directed by their staff turn left from the project toward Truckee. Their staff will have to be extremely brave souls. The emergency preparedness study by Mountainside Partners assumes just one fire scenario and doesn't consider a wind-driven event, which makes their plan useless.

At the end of the hearing, the commission elected to delay approval until they could have a hearing attended by Caltrans, U.S. Forest Service and the North Tahoe and Northstar fire districts.

They considered not allowing public comment. Wow. Larry Sevison, commissioner, tried to orchestrate an approval anyway which deferred the issues of fire evacuation and traffic congestion until later subsequent project approvals.

Luckily for Lake Tahoe/Truckee, that idea didn't succeed. These significant environmental impacts must be sorted out now.

By the way, Mountainside Partners claims it won't consider a smaller project. They must build 760 units or the project won't be financially feasible due to high infrastructure costs.

Hmmm, maybe the project concept of building in the middle of the forest on a ridge far from any existing development or infrastructure is a bad idea. What do you think? There's a concept for you.

Write your Gov. Jerry Brown-maybe he'll listen if Placer County won't:

Subject: Martis Valley West Project

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814
Phone: (916) 445-2841
Fax: (916) 558-3160
Email: https://govnews.ca.gov/gov39mail/webmail.php
Dear Governor Brown — tell Placer County they represent their citizens, not Martis Valley West developers.
Ann Nichols is a 39-year North Lake Tahoe resident and is president of the North Tahoe Preservation Alliance. Visit www.ntpac.com to learn more. PF54-1

North Tahoe Preservation Alliance
P.O. Box 4
Crystal Bay, Nv. 89402
775-831-0625
www.ntpac.com

"Helping preserve the natural beauty and rural character of North Lake Tahoe"

PF54

Ann Nichols
North Tahoe Preservation Alliance
June 15, 2016

PF54-1 The comment provides a reproduction of a Sierra Sun opinion article. The article addresses the Specific Plan and associated studies and the June 9 Planning Commission hearing. The comment does not directly address the EIR or the environmental analysis.

From: Stacy Wydra
To: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Sydney Coatsworth; Suzanne Enslow
Subject: FW: Correspondence Received: Martis Valley
Date: Wednesday, June 22, 2016 8:48:50 PM

PF55

Correspondence received.

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

-----Original Message-----
From: Shirlee Herrington On Behalf Of Placer County Environmental Coordination Services
Sent: Tuesday, June 21, 2016 9:27 AM
To: Stacy Wydra; Kathi Heckert
Subject: Correspondence Received: Martis Valley

-----Original Message-----
From: John Schroeder [mailto:john_schroeder7@hotmail.com]
Sent: Monday, June 20, 2016 5:14 AM
To: Placer County Environmental Coordination Services
Subject: Martis Valley

Good Morning,
I am an impartial resident of Reno and have been watching this project in the news.
I urge you to approve the development. My impression is that certain environmental groups will oppose virtually any new development, no matter how well conceived.
John Schroeder

PF55-1

PF55

John Schroeder
June 20, 2016

PF55-1 The comment requests approval of the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

From: Stacy Wydra
To: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Sydney Coatsworth; Suzanne Enslow
Subject: FW: Legal notice for Special Hearing 7-7-16 Tahoe Hearing - Martis Valley West Parcel Specific Plan
Date: Wednesday, June 22, 2016 11:52:06 AM
Attachments: image003.png

FYI – Public Correspondence received.

PF56

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Steve Teshara [mailto:steveteshara@gmail.com]
Sent: Tuesday, June 21, 2016 4:42 PM
To: Kathi Heckert; Paul Thompson
Cc: Stacy Wydra; Jennifer Montgomery; David Boesch; Larry Sevison
Subject: Re: Legal notice for Special Hearing 7-7-16 Tahoe Hearing - Martis Valley West Parcel Specific Plan

Ms. Heckert, Mr. Thompson, Ms. Wydra, Mr. Boesch, and Supervisor Montgomery:

I also seriously question the date you have chosen for this meeting. Three days following the 4th of July holiday. PF56-1

You need to seriously reconsider your planning process and public transparency in connection with this matter.

Steve Teshara, Principal
Sustainable Community Advocates

On Tue, Jun 21, 2016 at 4:36 PM, Steve Teshara <steveteshara@gmail.com> wrote:
Dear Ms. Heckert and Ms. Wydra: I sincerely doubt that in the time since the Planning Commission meeting of June 9th that Planning Staff has adequately addressed the issues identified by the Public and by members of the Planning Commission. I my view, it is also not appropriate that the Planning Commission has closed public comment on the Martis Valley West Parcel Specific Plan. PF56-2

Steve Teshara, Principal
Sustainable Community Advocates

PF56-2 cont.

On Tue, Jun 21, 2016 at 4:27 PM, Kathi Heckert <KHeckert@placer.ca.gov> wrote:
Hello Interested Parties

Please find attached legal notice for upcoming "Special Hearing date and time" for Planning Commission meeting.

Thank you.

Kathi Heckert, Senior Board /Commission Clerk,
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

PF56

Steve Teshara
Sustainable Community Advocates
June 21, 2016

PF56-1 The comment questions the timing of the July 7 Planning Commission hearing, so close to a national holiday. The comment, which does not directly address the EIR or the environmental analysis, is acknowledged.

PF56-2 The comment addresses the timing of the July 9 Planning Commission hearing and expresses that it is not appropriate that the Planning Commission closed the public hearing. At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting. Issues that were raised during the June 9 hearing were addressed in the staff report and presentations completed for the July 7 hearing.

From: Stacy Wydra
To: Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Fran Ruger; Sydney Coatsworth; Suzanne Enslow
Subject: FW: Legal notice for Special Hearing 7-7-16 Tahoe Hearing - Martis Valley West Parcel Specific Plan
Date: Wednesday, June 22, 2016 11:50:35 AM
Attachments: image003.png

PF57

FYI – Public Correspondence received.

Stacy Wydra

****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Mike Schwartz [mailto:backcountrystore@gmail.com]
Sent: Tuesday, June 21, 2016 5:57 PM
To: Kathi Heckert
Cc: Stacy Wydra
Subject: Re: Legal notice for Special Hearing 7-7-16 Tahoe Hearing - Martis Valley West Parcel Specific Plan

I think you guys are on crack to consider this project! Develop shit a little further from recreation please! Our local land managers don't do anything as it is with That small triangle of land below Mt. Watson. Now we have to lose the trails we maintain ourselves to tourists driving around and second home owners with $20k 4x4 razors?

If this goes through, Truckee could only be seen as clueless and greedy for more tax revenue.

Sent from my iPhone
Mike Schwartz
Mike@thebackcountry.net

PF57-1

On Jun 21, 2016, at 4:27 PM, Kathi Heckert <KHeckert@placer.ca.gov> wrote:

Hello Interested Parties

Please find attached legal notice for upcoming "Special Hearing date and time" for Planning Commission meeting.

Thank you.

Kathi Heckert, Senior Board /Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

<LegF 7-7-16 pch MVWestParcel (3).pdf>

PF57

Mike Schwartz
June 21, 2016

PF57-1 The comment expresses opposition to the project and general concern regarding the potential loss of trails. Impacts on existing recreation facilities are addressed in Draft EIR Impact 17-1, "Impacts on existing recreation facilities." As noted on page 17-1 of the Draft EIR, because the East and West Parcels are private property, all current recreation activity is informal/unauthorized, and occurs on user-made trails, except for cross-country skiing, biking and hiking on approximately 16 miles of West Parcel trails under a lease with CNL (CNL Lifestyle Properties, Inc.)/Vail Resorts for private use. Therefore, implementation of the proposed project would not eliminate existing, authorized public use trails. In addition, approximately 14 miles of trails are proposed within the West Parcel, which would connect to existing and planned trails including the future Martis Valley Trail, the Tompkins Memorial Trail, and the Tahoe Rim Trail, providing access for residents and guests to the broader regional trails network. The trails would support both winter sports, such as cross-country skiing and snowshoeing, and summer sports, such as hiking and biking.

(530) 745-3082

PF58

From: preserve@ntpac.com [mailto:preserve@ntpac.com]
Sent: Wednesday, June 22, 2016 2:29 PM
To: Jennifer Montgomery; skastan@placercounty.gov; Kathi Heckert
Cc: 'Alexis Ollar'; 'Tom Mooers'; 'Darcie Goodman Collins'; 'Shannon Eckmeyer'; amesl@sbcglobal.net; susan@friendswestshore.org; Jmtornese@aol.com; jgtahoe@sbcglobal.net; 'Dave Sutton'; perry@tdlandtrust.org
Subject: MVW requests private emails of NTPA

Jennifer Montgomery and Placer County Planning Commission:
(Kathy Heckert- please distribute to the Planning Commission Members)

Placer County and Ascent Environmental have failed to provide an environmentally superior alternative in the Martis Valley West (MVW) FEIR. Their proposed alternative promotes sprawl on the ridge above Lake Tahoe-760 units on 660 acres. PF58-1

NTPA found a land use planning expert from the University of Colorado to develop a proposal that shows this project could be done with considerably less environmental damage and still exceed the stated design objectives in the process. (See attached Letter of 6.3.16.pdf page 26-60). The existing MVW project wasn't well designed or thought out.

What we've asked for has been consistent from the start, a design that uses smart growth planning tools to reduce the identified project impacts. We were surprised the County did not insist on the same thing. This is well-known and established design practice.

Anyway, we achieved a much improved design proposal and the project is now in the public comment period. The Martis Valley West project has encountered significant public resistance from the North Lake Tahoe community. 5000 have signed petitions against ridgeline development and impacts to Tahoe. We had 250 plus people turn out to speak against the project at the recent Planning Commission. In most jurisdictions such universal condemnation would cause the County to deny the project.

Many of the organizations involved in submitting comments on this project have supported those comments with expert opinion as we have. Proposing an alternative that reduces environmental impacts is a noteworthy public service, and we are greatly appreciative the professional assistance we have received from a number of experts.

Unfortunately, rather than ask us for additional back-up or come to us to seek to better understand our proposal, the developer has undertaken a public records request without bothering to even notify us, even citing the public records law in the process. See attached email from Kurt Krieg of Mountainside Partners. He has requested all our emails and any documents related to our proposed alternative. PF58-2

As to our proposals, they will stand or fall on the merits of the design.

PF58-2 cont.

Sincerely,

Ann Nichols

North Tahoe Preservation Alliance
P.O. Box 4
Crystal Bay, Nv. 89402
775-831-0625
www.ntpac.com

"Helping preserve the natural beauty and rural character of North Lake Tahoe"

PF58

Ann Nichols
North Tahoe Preservation Alliance
June 22, 2016

PF58-1 The comment states that the EIR failed to provide an environmentally superior alternative in the Martis Valley West Final EIR. Four alternatives are described and analyzed in the Draft EIR, and one additional alternative was analyzed in the Final EIR. The comparative merits of these five alternatives are discussed in Section 19.8, Environmentally Superior Alternative, of the Draft EIR and Table 19-4 in the Final EIR. As discussed in Master Response 10 (Alternatives) in the Final EIR, the EIR is sufficient in meeting CEQA requirements associated with development and evaluation of alternatives. Each alternative discussed is considered to be feasible and would meet most of the objectives of the MVWPSP project. Placer County is not required to evaluate project alternatives that are not consistent with project objectives or are considered to be infeasible. Thus, no changes to the document are required and no additional alternatives need to be evaluated. Please see response to comment PF14-7 for a discussion of the commenter's proposed alternatives.

PF58-2 The comment refers to additional correspondence related to the commenter's proposed alternatives. Please see response to comment PF14-7 regarding the commenter's proposed alternatives.

From: Ellie [mailto:tahoellie@yahoo.com]
Sent: Thursday, June 23, 2016 8:15 AM
To: Kathi Heckert
Subject: Recent article for your review Please provide to Commissioners

PF59

Kathi please provide this e-mail to the Planning Commissioners.
Appreciate your assistance, Ellie Waller

Dear Placer County Planning Commissioners,
The article below in the Sierra Sun was published this week.

I also went before the Placer Board of Supervisors during public comment on June 21, 2016 and submitted as written comment to the TRPA Governing Board June 22, 2016. PF59-1

Looking forward to the Commissioners having a robust discussion about the merits of the Martis Valley West Parcel Specific Plan Draft Environmental documentation and consideration of the previous public comment.

I recently sent Distinct 5 Supervisor Montgomery an e-mail and hoping for a positive outcome to the request that the public have one more opportunity to close with you see below:

Continuation Planning Commission Hearing: Martis West PF59-2

- Ellie <tahoellie@yahoo.com>
-
- Jun 22 at 3:15 PM

To

- Steve Kastan
- Jennifer Montgomery

Hoping we will get an agenda telling us exactly what is intended for the meeting.

I only have one issue with the closure of public comment that carries merit- Whit Manley the attorney for Mountainside Partners was given a rebuttal opportunity leaving the Planning Commissioners with his interpretation of public comment. PF59-2 cont.

We should have an in kind opportunity by one member of the public or organization to challenge his interpretations.

Respectfully, Ellie

Dear Governing Board members:
As stated in my article below and begs the question:

"What's the hurry? To get these projects approved (the three majors projects listed below) have been in the queue with one environmental consultant. The consultant completes their efforts and we get slammed!"

I know that planning the release of documents is not a science and sometimes projects overlap, BUT not to the magnitude of the three larger projects in the queue and many others. PF59-3

The TRPA is a party to one of the three documents: The Tahoe Basin Area Plan. I am still trying to complete comprehensive comments on the FEIR for the Martis Valley West Parcel Specific Plan before the tentative July 7 Planning Commission continuation and subsequent July 26 Placer Board of Supervisors.

No surprise the Planning Commission meeting is scheduled on the holiday week (July 7).

First graduation day (June 9) now a holiday week.

Ellie Waller
Opinion
http://www.sierrasun.com/news/22576560-113/opinion-placer-county-needs-to-slow-down-its

Back to: **News**
June 21, 2016

Opinion: Placer County needs to slow down its development process

To Placer County:
The citizens of North Lake Tahoe (along with environmental groups in Tahoe and surrounding region and local government agencies) are asking for your support for a fair public process.
We have been besieged with thousands of pages of environmental documentation and have responded in kind. We have asked that Placer slow down the approval process to no avail and give each project its due respect.
Final and draft environmental reports on three major projects that will affect the next 20 years in the Tahoe region have been released within a span 70 days.

PF59-3 cont.

The Placer County public process for responding to environmental documents is being abused by releasing several documents of several thousands of pages (EIR document, reference materials, studies, etc. add up to thousands of pages) each for local government agencies, environmental groups, the public-at-large, etc. to respond with comprehensive comments to inform the local elected officials.

I do not require a lot of sleep and can pass up a few meals but it's been hard to get a breath of fresh air trying to read all the documents. There are only 24 hours in a day.

Yes, the County is adhering to minimum requirements for response time but not taking into consideration the volume of information we are required to consume to provide comments.

What's the hurry? To get these projects approved (the three majors projects listed below) have been in the queue with one environmental consultant. The consultant completes their efforts and we get slammed!

The process is not allowing for a sufficient amount of time between each project. They are being overlapped with several meetings each month that we must attend or send in written comments to build an accurate record.
Furthermore, there are many other smaller, but just as important, projects in the pipeline for public comment and meeting attendance (Placer and Nevada County):
1). The Railyard Mixed-Use Development Master Plan in Truckee.

2). The Crown Motel (Laulima) redevelopment of 4.5 acres on lake and mountain sides of Highway 28 includes 117 lodging rooms, 34 residential units, and 5,500 square feet of commercial space in Kings Beach.
3). The Alpine-Squaw Gondola project: a new 8-person gondola (a design capacity of approximately 1,400 persons per hour in both directions) connecting the Alpine Meadows and Squaw Valley Ski resorts.
4). And on-hold but will be released: The Brockway Campground — a 550-unit luxury camping experience with swimming pool, commercial, etc. atop a Tahoe ridgeline at Brockway Summit abutting the Martis Valley West parcel Specific Plan, just to name a few.
Info on the three major projects can be found below. It's not too late to participate before the projects are approved, but BEWARE it's a time consuming process just to address one project, let alone all three. PF59-3 cont.

Meetings we know of:
July 7: Placer Planning Commission, subject TBD (Squaw or Martis Valley West).
July 13: TRPA Advisory Planning Commission will hear Tahoe Basin Area Plan.
July 26: Placer Board of Supervisors Martis Valley West, tentative.
July 27: TRPA Governing Board and Regional Plan Implementation Committee (two presentations same day) on the Tahoe Basin Area Plan.
July 28: Placer County Planning Commission, Tahoe Basin Area Plan.
August 9: Placer County Planning Commission, Squaw, tentative.
August 11: North Tahoe Regional Advisory Council, Tahoe Basin Area Plan
Stay Tuned: Squaw and Martis Valley West will have meetings actually scheduled.

Below are shortened URLs to the environmental reports and more information on the three major aforementioned projects:
Tahoe Basin Area Plan (20+ year up date of community plans and a 120 unit hotel in Tahoe City) released June 15, 2016, Draft Environmental Impact Report: bit.ly/28NfL9T
Martis Valley West Parcel Specific Plan Final Environmental Impact Report, released May 3, 2016: bit.ly/28R5QPl
Village at Squaw Valley Specific Plan Final Environmental Impact Report, released April 7, 2016: bit.ly/28LywvL

Ellie Waller is a Tahoe Vista resident.

PF59

Ellie Waller
June 23, 2016

PF59-1 The comment refers to an attached Sierra Sun article and previous comments made by the commenter to the Board of Supervisors and the TRPA Governing Board. The comment does not address the EIR environmental analysis.

PF59-2 The comment requests an opportunity to provide public comment at the continued Planning Commission hearing. At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting.

PF59-3 The comment reproduces written comments provided to the TRPA Governing Board regarding the proposed MVWPSP and other projects. The comment does not address the EIR environmental analysis. See response to comment PF29-3.

PF60

Sent: Thursday, June 23, 2016 3:53 PM
To: Kathi Heckert; Amy J. Bricker
Cc: Stacy Wydra; Jennifer Montgomery; David Boesch; Steve Kastan; Tom Mooers; Darcie Goodman Collins; Shannon Eckmeyer; msg3@att.net; 'Larry Sevison (lpsevison@sbcglobal.net)' (lpsevison@sbcglobal.net)
Subject: Placer County Planning Commission - Special Hearing Notice for Martis Valley West

Hi Kathi,

Please forward this email to the Placer County Planning Commission members.

Dear Placer County Planning Staff and Planning Commission Members,

Mountain Area Preservation received the 'Notice of Public Hearing for Placer County Planning Commission for July 7, 2016 2:00PM', for the Martis Valley West Parcel continuation, which states the public testimony portion of the hearing will be closed. This is very unsettling knowing that the commission requested agencies and representatives to be present to discuss their concerns regarding traffic impacts on HWY 267, wildfire safety, emergency evacuation, public safety and impacts to Lake Tahoe. Knowing the scale of these big issues new information will likely be provided to the legislative body and public comment must be granted under the Brown Act (please see highlighted Brown Act Government Code posted below). To not allow public comment for the Martis Valley West continuation is an affront to the public process. According to the Brown Act public hearings must require public comment. We respectfully request an opportunity for public comment be provided on July 7. PF60-1

54954.3.

(a) Every agenda for regular meetings shall provide an opportunity for members of the public to directly address the legislative body on any item of interest to the public, before or during the legislative body's consideration of the item, that is within the subject matter jurisdiction of the legislative body, provided that no action shall be taken on any item not appearing on the agenda unless the action is otherwise authorized by subdivision (b) of Section 54954.2. However, the agenda need not provide an opportunity for members of the public to address the legislative body on any item that has already been considered by a committee, composed exclusively of members of the legislative body, at a public meeting wherein all interested members of the public were afforded the opportunity to address the committee on the item, before or during the committee's consideration of the item, unless the item has been substantially changed since the committee heard the item, as determined by the legislative body. Every notice for a special meeting shall provide an opportunity for members of the public to directly address the legislative body concerning any item that has been described in the notice for the meeting before or during consideration of that item.

(b) The legislative body of a local agency may adopt reasonable regulations to ensure that the intent of subdivision (a) is carried out, including, but not limited to, regulations limiting the total amount of time allocated for public testimony on particular issues and for each individual speaker.

(c) The legislative body of a local agency shall not prohibit public criticism of the policies, procedures, programs, or services of the agency, or of the acts or

omissions of the legislative body. Nothing in this subdivision shall confer any privilege or protection for expression beyond that otherwise provided by law.

PF60-1 cont.

Please feel free to contact me with questions related to this email.

Alexis Ollar

--

Alexis Ollar, MS & GISP
Executive Director
Mountain Area Preservation
P.O. Box 25
Truckee, Ca 96160
Office: 530.582.6751
Alexis@Mapf.org
www.MountainAreaPreservation.org

Like us on Facebook

"We abuse land because we see it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect."
~Aldo Leopold

Please consider the environment before printing this email.

CONFIDENTIALITY NOTICE - DO NOT FORWARD OR COPY: The contents of these communications and any attachments are intended solely for the personal and confidential use of the recipient(s) named above. This communication is intended to be and to remain confidential. Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

PF60

Alexis Ollar
Executive Director, Mountain Area Preservation
June 23, 2016

PF60-1 The comment expresses concern that the notice for the July 7, 2106 Planning Commission public hearing stated that the public testimony portion of the hearing would be closed. At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting, and public comments will be taken at the subsequent Board of Supervisors meeting on the proposed project.

From: Stacy Wydra
To: Fran Ruger; Sydney Coatsworth; Suzanne Enslow; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net)
Cc: Kathi Heckert; Shirlee Herrington; Paul Thompson
Subject: FW: July 7th planning commission meeting
Date: Monday, June 27, 2016 4:35:45 PM
Attachments: image003.png

PF61

Hello All –
Please find email correspondence below regarding the MVWPSP.
Thanks –
Stacy

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: theochoas3@charter.net [mailto:theochoas3@charter.net]
Sent: Sunday, June 26, 2016 5:09 PM
To: Kathi Heckert; Stacy Wydra
Subject: July 7th planning commission meeting

Please forward this email to the Placer County Planning Commission members.

Dear Placer County Planning Staff and Planning Commission Members, PF61-1

I am writing regarding the upcoming 'Notice of Public Hearing for Placer County Planning Commission' for July 7, 2016 at 2:00pm, for the Martis Valley West Parcel continuation. The notice states that the public testimony of the hearing will be closed. I find this very troubling as this may violate the Brown Act, which states that public hearings must require public comment. The public has been intensely interested in the planning process for this project

which has huge impacts to the Lake Tahoe area. Traffic is one of the most notable concerns and will have some of the most significant impacts. Any new information will be of great interest to all stakeholders, especially the public. If the project goes through, the public will be the ones living with the "unavoidable impacts" and should have the opportunity to voice their concerns. I respectfully ask that you reconsider your decision and allow public comment.

Thank you,

Cindy Ochoa, Chair, Tahoe Area Sierra Club

PF61-1 cont.

Brown Act:

54954.3.

(a) Every agenda for regular meetings shall provide an opportunity for members of the public to directly address the legislative body on any item of interest to the public, before or during the legislative body's consideration of the item, that is within the subject matter jurisdiction of the legislative body, provided that no action shall be taken on any item not appearing on the agenda unless the action is otherwise authorized by subdivision (b) of Section 54954.2. However, the agenda need not provide an opportunity for members of the public to address the legislative body on any item that has already been considered by a committee, composed exclusively of members of the legislative body, at a public meeting wherein all interested members of the public were afforded the opportunity to address the committee on the item, before or during the committee's consideration of the item, unless the item has been substantially changed since the committee heard the item, as determined by the legislative body. Every notice for a special meeting shall provide an opportunity for members of the public to directly address the legislative body concerning any item that has been described in the notice for the meeting before or during consideration of that item.

(b) The legislative body of a local agency may adopt reasonable regulations to ensure that the intent of subdivision (a) is carried out, including, but not limited to, regulations limiting the total amount of time allocated for public testimony on particular issues and for each individual speaker.

(c) The legislative body of a local agency shall not prohibit public criticism of the policies, procedures, programs, or services of the agency, or of the acts or omissions of the legislative body. Nothing in this subdivision shall confer any privilege or protection for expression beyond that otherwise provided by law.

PF61

Cindy Ochoa
Tahoe Area Sierra Club
June 26, 2016

PF61-1 The comment expresses concern that the notice for the July 7, 2106 Planning Commission public hearing stated that the public testimony portion of the hearing would be closed. The comment requests that the Planning Commission allow public comment. At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting, and public comments will be taken at the subsequent Board of Supervisors meeting on the proposed project.

FRIENDS OF THE WEST SHORE

PF62

Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603

June 27, 2016

Subject: Martis Valley West Parcel Specific Plan (PGPA 20130080), State Clearinghouse No. 2014032087

Dear Members of the Planning Commission:

The Friends of the West Shore (FOWS) respectfully requests the opportunity be provided for the public to speak at the July 7, 2016 hearing for the Martis Valley West Parcel Specific Plan. As noted at the June 9 meeting, several questions remained regarding the impacts to State Route 267 and role of Caltrans, the fire danger and impacts to evacuation from North Lake Tahoe, and impacts to the Lake Tahoe Basin. The Planning Commission requested representatives of Caltrans and fire departments be available at the next meeting for questions; it is therefore reasonable to expect that additional information may be provided for which the public should have the opportunity to comment on. PF62-1

We also believe it is a violation of the Brown Act Government Code 54954.3(a) to prohibit public comment at the upcoming meeting.[1] Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

[1] http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=54001-55000&file=54950-54963

PF62

Susan Gearhart and Jennifer Quashnick
Friends of the West Shore
June 27, 2016

PF62-1 The comment requests that the Planning Commission allow public comment at the July 7, 2016 hearing, citing the Brown Act Government Code 54954.3(a). At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting, and public comments will be taken at the subsequent Board of Supervisors meeting on the proposed project.

KEEP TAHOE BLUE.

PF63

Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603
planning@placer.ca.gov
swydra@placer.ca.gov

Date: June 28, 2016
To: Placer County Planning Commission
From: The League to Save Lake Tahoe
Re: Request to Open Public Comment on Martis Valley West Specific Plan for July 7, 2016 Meeting

Dear Commissioners,

The League to Save Lake Tahoe (the League) respectfully requests that your commission open the meeting set for July 7, 2016 to public comment. Many of your members had unresolved questions following the Martis Valley West Specific Plan hearing on June 9, 2016. Several concerns as they relate to fire danger, Caltrans road operations, and environmental impacts to the Lake Tahoe Basin were not adequately discussed in the environmental review. These concerns remain following your hearing. PF63-1

As decision makers for such a large project with significant impacts it is necessary for your concerns to be vetted and resolved. The public must have the ability to respond to questions raised as the project proponent has yet to do so. The League is working diligently to provide information on how the project will impact the North Lake Tahoe region and request to be able to provide public comment on your concerns. It is also critical that Caltrans and regional fire departments be included and invited to speak on other concerns raised.

The role of this commission is not only to approve projects, but to influence them. As advocates for Lake Tahoe, the League asks you to consider this national treasure in your deliberations. Please allow the public to speak in response to your concerns

Sincerely,
Darcie Collins, PhD
Executive Director
League to Save Lake Tahoe

League to Save Lake Tahoe · 2608 Lake Tahoe Boulevard · South Lake Tahoe, CA 96150 · 530.541.5388 · f 530.541.5454 · keeptahoeblue.org
Printed on recycled paper

PF63

Darcie Collins
Executive Director, League to Save Lake Tahoe
June 28, 2016

PF63-1 The comment requests that the Planning Commission open public comment at the July 7, 2016 hearing, citing questions related to fire danger, Caltrans road operations, and environmental impacts to the Lake Tahoe Basin. As stated in the staff report for the July 7 hearing, after receiving public testimony at the June 9, 2016 hearing, the Planning Commission requested additional information from County staff related to the potential effects of the proposed project on Lake Tahoe, fire evacuation and fire safety, and traffic operations on State Route 267. As explained in the July 7 staff report, these issues are addressed in the EIR, the July 7 Planning Commission staff report, and the staff report attachments. At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting, and public comments will be taken at the subsequent Board of Supervisors meeting on the proposed project.

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

June 30, 2016

PF64

Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603

Dear Commissioners:

Thank you for your continued consideration of Martis Valley West Parcel Specific Plan.

This letter is written to correct some of the errors and assertions made during your meeting of June 9, 2016. (Note that we have no access to meeting minutes; quotes are from our own notes.)

1. **Stacy Wydra, County Planner:**

   "This project is a product of the MVOA." PF64-1

   The project is not a product of the Martis Valley Opportunity Agreement (MVOA), signed in 2013. In fact, it's wildly inconsistent with that agreement.

   The MVOA called for a switch of land use *designations* to the West Side, including contemplation of development in the Basin portion, and permanent preservation of the East Side. Development units would total 760.

   The West Side is now subject to two development proposals, the Martis Valley West Parcel Project and Brockway Campground proposal, that far exceed what was agreed to in 2013. The differences lie in both the scale of proposed development and in the depth of proposed development entitlements.

   In terms of the scale of development, the MVOA foresaw designations for a potential maximum of 760 units for the property. The Martis West and Brockway

Campground proposals, however, call for much more: entitlements that would total more than 1,300 combined campground/resort and residential units.

In terms of entitlements, the MVOA called for a swap in designations. It did not call for the granting of development rights as proposed with the Martis West Parcel Specific Plan. The applications for both the Martis West parcel and Brockway Campground projects ask for a deep set of entitlements for each project – of far greater specificity and value – than the agreed-upon "swap" of designations agreed to 2013. PF64-1 cont.

Sierra Watch remains committed to the goals of the MVOA. This project is not.

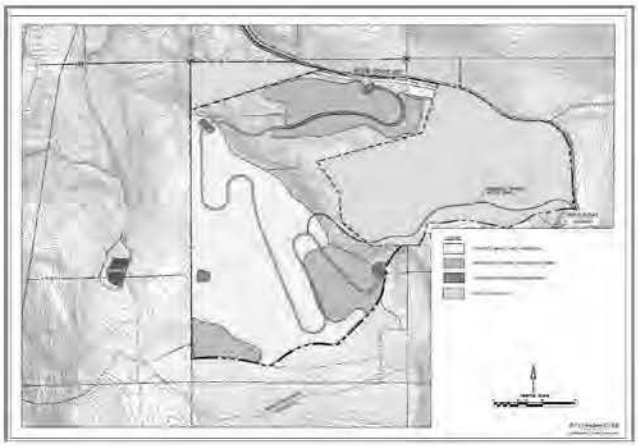
2. **Sydney Coatsworth, Ascent Environmental:**

"There is not development on the ridgeline."

It's impossible to understand how anyone who has walked the property – or just looked at a map – could agree that "there is no development on the ridgeline."

As is apparent in the Specific Plan itself, this is ridgeline development. Development runs along the Tahoe Regional Planning Agency planning boundary – the rim of the Tahoe Basin, the *ridgeline* between Tahoe and Martis. PF64-2

The purple blob of commercial development, for example, on the lower right of the proposed Specific Plan is clearly proposed for a high point along that ridgeline:



3. **EJ Ivaldi, Deputy Planning Director:**

"There are no development rights associated with what you are voting on."

"There is a large lot map but no development rights associated with that."

This is false – as spelled out in the County's own staff report. The proposed Development Agreement, part of the Commission's packet for the meeting of June 9, clearly states that the developer "shall have a vested right to develop up to 760 dwelling units and up to 6.6 acres of commercial development (up to 34,500 square feet of commercial and 22,000 square feet of homeowner amenities) on the portion of the West Parcel (662 acres) that is designated for such uses." (Proposed Development Agreement at 5.) PF64-3

We won't speculate on *why* that was said. But we will encourage the Planning Commission to fully understand the gravity of the decision – the scope of the project and its entitlements – before you now. And we ask that you resist any misguided attempts to downplay its significance or pass the buck to future decision-making opportunities.

We understand that there is a range of opinions regarding the proposed development. But there should be only set of facts.

Sincerely,

Tom Mooers
Executive Director, Sierra Watch

PF64

Tom Mooers
Executive Director, Sierra Watch
June 30, 2016

PF64-1 The comment states that the project, as proposed, is not a product of the 2013 Martis Valley Opportunity Agreement and provides background information. The comment does not directly address the EIR or the environmental analysis.

PF64-2 The comment states that the project would result in ridgeline development, which is not consistent with statements made at the June 9 Planning Commission hearing that no such development would occur. The statement made during the Planning Commission hearing is consistent with the analysis in the EIR, which explains that the project would not include development or uses on the highest elevations or ridgelines that separate the Tahoe Basin from the surrounding areas (see Master Response 4, Visual Resources Assessment Methodology, in the Final EIR). Also, as explained in Master Response 2, Brockway Campground Proposal in the Final EIR, the proposed project is described in relation to the proposed Brockway Campground as being on the opposite side of a ridge. The EIR explains that the project would not include development on the ridgeline in the Tahoe Basin, because the project is outside of the Basin. The comment itself refers to a location on the proposed Specific Plan map that is clearly proposed for a high point along "that ridgeline." While the comment may refer to a location on one of several ridgelines within the project site, the Final EIR responses to comments refers to a ridgeline at the highest elevation. Please also see responses to comments PF13-7 and PF19-13.

PF64-3 The comment discusses the proposed Development Agreement and potential development rights. See response to comment PF29-8.

KEEP TAHOE BLUE.

MAP mountain area preservation

SIERRA WATCH

PF65

June 30, 2016

Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603

Dear Commissioners:

The League to Save Lake Tahoe, Mountain Area Preservation, and Sierra Watch submit this letter in advance of your continued hearing regarding the proposed Martis Valley West Parcel Specific Plan on July 7, 2016.

On June 9, 2016 the Placer County Planning Commission held a meeting regarding the proposed Martis Valley West Parcel Specific Plan and its Final EIR. More than 250 citizens attended, many of whom stepped to the microphone to encourage the County to deny the project. Project proponents, along with their counsel, consultants, and County staff, were given ample time to rebut any arguments and advocate approval of the project. PF65-1

However, after six hours, important issues remain unresolved. The Commission did not vote on a recommendation but, instead, voted to continue the hearing to an "open date" in order to learn more about the proposed project's potential impacts on three key issues: (1) Traffic and Highway 267; (2) Fire Safety and Emergency Evacuation; and (3) Lake Tahoe. (Note that official minutes have yet to be released; the motion above is from our own meeting notes.)

First, we'd like to thank the Commission for pursuing additional input and discussion. A project such as this one would have lasting impacts throughout the Tahoe Region – for decades, even centuries. So it makes sense to take time and due diligence for further assessment.

Second, although a proposal of this magnitude would have far-reaching effects on a variety of important issues, we appreciate the Commission's focus on three issues that are clearly very important to the economic well-being, environmental health, and public safety of the region.

The time to address these matters is *now*. There's a temptation to pass the buck of tackling tough issues to future steps in the process. But it's the proposal before you *now* that will set the blueprint for the western portion of Martis Valley. It's the entitlements the proponents seek *now* that would establish irrevocable development rights. Or, as the court established in the landmark *Laurel Heights* decision, approvals would create too much "bureaucratic and financial momentum" to ever turn back. PF65-1 cont.

The three issues – traffic, fire safety, and Tahoe – have been discussed in the EIR and, not surprisingly, generated comments from individuals, agencies, and organizations. This letter is designed to summarize that input in advance of your meeting July 7, 2016.

Traffic and Highway 267

Traffic on Highway 267 is already a problem. The proposed project would guarantee gridlock – and threaten public safety.

According to the project's EIR, the vast majority of Highway 267, including adjacent to the project entrance's intersection with 267, would "function" at LOS E – nearly gridlock conditions– during summer *and* winter.

The project would spread traffic throughout the region, from I-80 and into the Tahoe Basin. In a comment letter submitted to the County, the *North Tahoe Fire Protection District*, quotes the Draft EIR's projected impacts on traffic and Highway 267, "The proposed project would worsen already unacceptable operations…" PF65-2

The DEIR also makes clear that Highway 267 from the Town of Truckee/Placer County Line all the way to the Lake (SR 28) would function at LOS E, i.e., near gridlock conditions during peak hours in the summer and winter.

The notion that we can pave our way out of our traffic jams by, for instance, widening stretches of Highway 267 is misguided at best. There is no guarantee that such "improvements" would actually be constructed. Even if they were, the result would be simply to shift bottlenecks – south to Brockway Summit and down the two-lane stretch of 267 to Highway 28, for example. If we could buy our way out of traffic in Tahoe, we would have done so long ago.

The proposed project would also present a threat to basic public safety. Caltrans opposes a new signal at the project's proposed intersection with Highway 267 because of the steep grade on 267 and the likelihood of rear-end collisions, especially in snowy conditions. PF65-2 cont.

Would a stop sign or turn lane be any safer? Vehicles turning onto SR 267 from a stop would be subject to a greater risk: broadside collisions, which are more dangerous than rear-end collisions.

Fire Safety and Emergency Evacuation

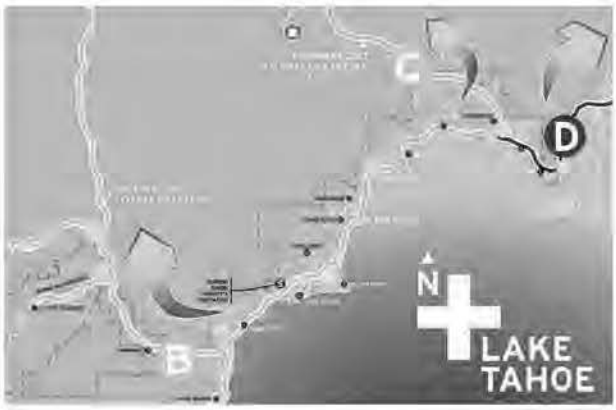
The project's location, the nature of proposed development, and the lack of transportation infrastructure create a recipe for wildfire and disaster.

According to the project's EIR, Martis Valley is considered a "fire environment" because of the climate, steep topography, and high level of available fuel. And the project site is located in a *Very High Fire Hazard Severity Zone*, as indicated in the Final EIR, a place where fires could result in catastrophic losses.

The severity of that danger is exacerbated by the nature of the project. Instead of the type of infill development Tahoe and Placer County policies encourage, the project would be developed in the *Wildland-Urban Interface*, which both increases the likelihood of ignition and places people and structures directly in the line of fire. PF65-3

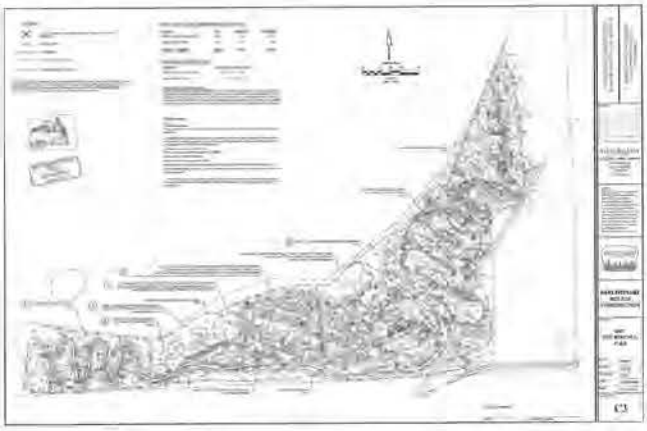
Wildfire in the Tahoe Sierra is clearly not a question of *if* but of *when*. If this project were built, what would happen *when* there is a fire? The lack of transportation infrastructure – and gridlock under normal conditions – would exacerbate the tragedy.

As an attachment to its comments on the Draft EIR, the *North Tahoe Fire Protection District* included its Placer Operational Area East Side Emergency Evacuation Plan (pictured):



It clearly indicates that Highway 267 is a major evacuation route for *existing* residents – for much of North Tahoe. But, according to the project's EIR, every stretch of Highway 267 would operate at near gridlock conditions. What happens when there's a fire?

According to the proposed Specific Plan, some residents would exit the project via the Fiberboard Freeway. The use of the word 'freeway' in this case is, of course, ironic. It's a narrow, one-lane logging road. And, because it runs through the project proponent's proposed "Brockway Campground" development, it would be a narrow, one-lane road surrounded by campsites, resort amenities, and commercial development:



PF65-3 cont.

Evacuation would be a matter of *out of the frying pan and into the fire* – escaping into a maze of campsites and permanent structures, competing with a thousand guests for the limited capacity of the Fiberboard "Freeway".

According to the project's own EIR, it would take residents and employees 1.5 hours just to leave the property. Then what? The project and its EIR defer any meaningful analysis, ignoring the need for existing residents in North Tahoe and in Martis Valley to evacuate and irresponsibly claiming that a future "Fire Protection Plan" will provide the answers.

Public safety is not a "hot potato" that can be thrown to some future decision-making body. It's the most fundamental issue in planning. It needs to be addressed before development rights are granted, not after. Otherwise we are not planning *for disaster*; we are planning *a disaster*.

Lake Tahoe

Because negative impacts would be so far-reaching – from the prospects for economic development to the brightness of stars in the night sky, it is difficult to summarize what the project would mean to Tahoe.

The most obvious impacts come from traffic.

The Tahoe Regional Planning Agency (TRPA) calculates that the new development would add 1,395 cars into the Basin *daily* – and they note that "a 'significant increase' is defined as more than 200 daily vehicle trips." PF65-4

That traffic leads to an increase in Vehicle Miles Travelled (VMT), which, in turn, leads to further loss in the lake's famous clarity.

TRPA also expresses concern about how the project would impede its strategy of town-centered, in-basin redevelopment. In its comment letter on the Draft EIR, TRPA states,

> "The environmentally beneficial redevelopment relied upon by TRPA may be threatened by unmitigated out-of-basin increases in trips and VMT. As a result of VMT capacity used elsewhere, efforts to protect Lake Tahoe may suffer without the ability to approve in-basin development."

For Tahoe, the project is the worst of both worlds: North Tahoe doesn't get the economic development it needs – but gets the traffic its roads can't handle. And the lake suffers another blow to its clarity.

Conclusion

There are many reasons why the Planning Commission should recommend denial of the proposed Martis Valley West Parcel Specific Plan. Many of the reasons are legal in nature, as required by state law and as spelled out in our detailed comment letters on both the Draft and Final EIR's.

PF65-5

Yet even when an assessment of the project's impacts are reduced to only three topics traffic, fire danger, and Tahoe, the evidence is overwhelming. The project would guarantee gridlock, encourage disaster, and threaten the integrity of Lake Tahoe. Martis Valley, North Tahoe, and Placer County deserve better.

We thank you, again, for taking the time to dive deeper into the proposal and its potential impacts. We look forward to the scheduled hearing on July 7 and an opportunity to respond to any new information or analysis revealed at that time.

Sincerely,

Darcie Collins
Executive Director, League to Save Lake Tahoe

Alexis Ollar, MS & GISP
MAP Executive Director

Tom Mooers
Executive Director, Sierra Watch

PF65

Darcie Collins, Executive Director, League to Save Lake Tahoe
Alexis Ollar, Executive Director, MAP
Tom Mooers, Executive Director, Sierra Watch
June 30, 2016

PF65-1 The comment summarizes a portion of the June 9, 2016 Planning Commission hearing and states that project proponents, their counsel, consultants, and County staff "were given ample time to rebut any arguments and advocate approval of the project." For clarification, it is not the role of the EIR or its consultants to recommend approval or denial of a project. Rather, the purpose of the EIR is to provide environmental information to lead and responsible agencies and the public for use in the decision-making process.

The comment introduces the three topics about which the Commission requested additional information: traffic and SR 267, fire safety and emergency evacuation, and Lake Tahoe. These subjects are addressed in the remainder of the letter. Please see responses to comments PF65-2 to PF65-5.

PF65-2 The comment addresses traffic on SR 267, noting that most of Highway 267 would operate at LOS E during summer and winter, and the potential mitigation—widening portions of SR 267—would not improve conditions but would only shift congestion south to Brockway Summit and SR 28. The comment is consistent with information under Impact 10-2, Roadway Segments, starting on page 10-29 of the Draft EIR. The comment also raises public safety issues at the intersection of SR 267 and the project's access road. See response to comment PF29-27.

PF65-3 The comment addresses fire safety and emergency evacuation. See response to comment PF13-8 regarding this topic. Regarding the Fibreboard Freeway as a second emergency access route, see Master Response 2 in the Final EIR. Regarding the evaluation of the 1.5-hour evacuation time for the proposed project, the LSC memo analyzes the amount of time needed to evacuate the MVWPSP site on a peak summer day, when traffic levels on SR 267 would be high and includes both existing and future conditions based on the traffic analysis in the Draft EIR. The analysis focuses on the amount of time it would take for residents and guests to travel to the airport, not just to leave the property, as indicated by the comment.

PF65-4 The comment reiterates information from the Tahoe Regional Planning Agency comment letter on the Draft EIR. Please see responses to comments RA1-1 through RA1-3 of the Final EIR.

PF65-5 The comment recommends denial of the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

From: Stacy Wydra
To: Kathi Heckert
Cc: Paul Thompson; EJ Ivaldi; Karin Schwab; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net); Sydney Coatsworth; Fran Ruger; Suzanne Enslow
Subject: FW: Public Input at Planning Commission July 7
Date: Thursday, June 30, 2016 2:05:05 PM
Attachments: image001.png
image010.png

PF66

Hello All -
Please see the email below.
Thanks –
Stacy

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Tom Mooers [mailto:tmooers@sierrawatch.org]
Sent: Thursday, June 30, 2016 11:59 AM
To: Placer County Planning; Stacy Wydra
Cc: 'Alexis Ollar'; 'Darcie Goodman Collins'; 'Amy J. Bricker'
Subject: Public Input at Planning Commission July 7

Sierra Watch requests that, as required by Gov't Code 54954.3, the Placer County Planning Commission take public comment on the Martis West Parcel Project at its scheduled meeting of July 7, 2016.

Under the Brown Act, the public has a right to comment on any item on the agenda – including continued items.

PF66-1

Please reply to acknowledge receipt.

Thank you,

Tom Mooers/Executive Director
Sierra Watch/www.sierrawatch.org

PF66-1 cont.

SIERRA WATCH

SAVE MARTIS VALLEY

KEEP SQUAW TRUE

Facebook

PF66

Tom Mooers, Executive Director
Sierra Watch
June 30, 2016

PF66-1 The comment requests that the Planning Commission allow public comment at the July 7, 2016 hearing. See response to comment PF63-1. At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting, and public comments will be taken at the subsequent Board of Supervisors meeting.

COUNTY OF Placer

COMMUNITY DEVELOPMENT RESOURCE AGENCY

PF67

From: Linda Lapointe [mailto:llapointe@nycap.rr.com]
Sent: Thursday, June 30, 2016 12:49 PM
To: Shirlee Herrington
Subject: martins valley west

As a relative and visitor to this beautiful area, please register my concerns about preserving and protecting this unique environment
Thank you,
Linda Lapointe
Pittsfield, Ma.

PF67-1

PF67 Linda Lapointe June 30, 2016

PF67-1 The comment expresses concern about preserving and protecting the unique environment of the area. The comment, which does not directly address the EIR or the environmental analysis, is acknowledged.

Kathi Heckert

PF68

From: Shirlee Herrington
Sent: Friday, July 01, 2016 5:30 PM
To: Stacy Wydra
Cc: Kathi Heckert
Subject: FW: Martis Valley West projecst

fyi

Thank you,
Shirlee

Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
530-745-3132
sherring@placer.ca.gov

COUNTY OF Placer
COMMUNITY DEVELOPMENT RESOURCE AGENCY

From: Margaret Martini [mailto:margaretmartini@liveintahoe.com]
Sent: Friday, July 01, 2016 5:15 PM
To: Shirlee Herrington
Subject: Martis Valley West projecst

7-1-2016
I will be out of town for the scheduled meeting on July 7.
I do want my comments to be considered since I am a long time (1964) resident of the Tahoe area.
This project is just not a good fit for this area.
It is a travesty to change zoning from forest conservation to high rises, density, commercial and ridgeline development.
The traffic idea presented is ludicrous at best. Their solution is a non-solution as it is human nature t o take the shortest PF68-1
highway to the destination , be it Tahoe, Truckee, Reno, or all points on I-80.
I fail to see that this change was not quashed in the beginning by a planning commission who is responsible for the welfare of ALL residents and citizens of the community/county that you represent...not the bottom line profit of a developer (s).
It is also very suspicious that a developer would commence with a project not knowing that the zoning was not what they needed to perfect their plan for development for profit. Perhaps they thought that the zone change would be easy as the county would be getting more money...perhaps...is this what the county is thinking instead of preserving a protective zoning area? Is it always always all about the money for government agencies?
This is a classic example of the old song " PAVE PARADISE AND PUT UP A PARKING LOT".
It is just the wrong thing to approve.

1

If your county needs money that badly, then let the development be in the more urban settings with the infrastructure in place. People will still want to come and purchase in your county...it is after all surrounded by pristine wilderness...right now it is anyway.
The decision is in your hands...please do the right thing for everyone, not just one pocket lining project. PF68-1 cont.

Margaret Martini

Incline Village Sales Company
948 Tahoe Blvd.
Incline Village, NV 89451
775-831-3333
Cell: **775-722-4152**
margaretmartini@liveintahoe.com
inclinevillagetahoe.com

PF68

Margaret Martini
July 1, 2016

PF68-1 The comment expresses concern about the project in general, and specifically in regard to traffic and a zoning change. Proposed zoning changes are evaluated in Chapter 5, "Land Use and Forest Resources," of the Draft EIR. Traffic issues are evaluated in the Draft EIR in Chapter 10, "Transportation and Circulation."

Kathi Heckert

From: Mary Jo McAllister <mctahaca@hotmail.com>
Sent: Friday, July 01, 2016 8:12 PM
To: Kathi Heckert
Subject: Martis Valley Project

PF69

July 1, 2016

To whom it may concern:

We are in receipt today of a letter directed to you, among others, expressing support for the NEGATIVE side of the Martis VAlley Project. As property owners in Carnelian Bay since 1976, we are opposed to this project for many of the reasons already voiced at the ongoing meetings in regard to this development. My husband and I wish to go on record as supporting the letter's contents which are clearly and forthrightly written.

PF69-1

In light of the recent spate of fires threatening our state, it should be pointed out that traffic in the Tahoe Basin -- even at its present population numbers -- could not handle a fire evacuation of the magnitude that would face us should a raging fire "explode" in our midst. If for no other reason expressed, this one is paramount in supporting the NEGATIVE vote of against this project's approval. We are not contemplating the loss of one community here; we are talking about the loss of an entire basin of population, their homes, their families, and their property -- all because we could not escape extinction. There are promoters who choose to ignore this cataclysmic event's befalling us.

We wish to express our agreement with thecontents of the letter on your desks. Our basin is a precious natural resource that already is overcrowded. Projects that threaten to add great numbers of residents are unthinkable at this point intime (perhaps NEVER).

Sincerely,

Tom and Mary Jo McAllister
P.O. Box 261
Carnelian Bay, CA 96140

PF69

Tom and Mary Jo McAllister
July 1, 2016

PF69-1 The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. The comment expresses agreement with the contents of another letter submitted to the County, but does not identify the letter to which it is referring. The comment expresses concerns regarding traffic and a fire evacuation. Wildfire hazards and evacuation are addressed in Chapter 18 of the Draft EIR as well as in Master Response 9 in the Final EIR.

PF70

From: Joanne McGrail
To: Kathi Heckert; Placer County Board of Supervisors
Subject: Fwd: Fw: Joint Comment Letter for Planning Commission Meeting 7/7/2016 League, MAP, Sierra Watch
Date: Friday, July 01, 2016 3:54:37 PM
Attachments: 16 06 30 LSLT MAP SW letter to Placer County Planning Commission re MVWP.pdf
image001.png

As a 45 year resident of Carnelian Bay, North Lake Tahoe I support the attached joint letter describing the reasons the Martis West development should be denied.. For all the reasons mentioned by those who spoke at the last meeting, please deny the Martis West development. PF70-1

Joanne McGrail
Carnelian Bay, CA

PF70 Joanne McGrail July 1, 2016

PF70-1 The comment requests denial of the proposed project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

From:	K Yagura <kkyagura@gmail.com>
Sent:	Saturday, July 02, 2016 9:32 AM
To:	Kathi Heckert; Placer County Board of Supervisors
Subject:	Martis Valley West Project,

PF71

To the Placer Country Board of Supervisors,

We are writing this email letter in support of the the letter signed by the League to Save Lake Tahoe, MAP and Sierra Watch sent to you regarding their strong objections to the proposed Martis Valley West project. While we were able to sit through 5 of the 6 hours of the recent Planning Commission meeting held at the Granlibakken Resort, we will not be able to attend the 7 July meeting.

We will only focus this letter on one aspect: fire evacuation safety. As you know, there is a very high probability of a disastrous forest fire occurring at North Tahoe - Truckee in the near future. Large clumps of a dozen or more dead and dying trees can be seen in our Tahoe Vista neighborhood and thousands of dead and dying trees dot this small area of the Sierras (According to one statistic, 96 million trees have died or are dying in the Sierras since 2010). It would only take a lightning strike during a thunderstorm, an ill-advised or illegal campfire, or a spark from a vehicle or construction tool to set off a blaze that could roar up our mountains and valleys. PF71-1

For those of you who have not experienced such a fire, we can give a simple real life example of what happened when only <u>one</u> tall tree went up in flames at the Mourelato's Resort in Tahoe Vista one year. It was located on the lake side of the resort and, we believe, set afire by a lightning strike.

We had just driven down Estates Drive at the curve on Highway 28 (North Lake Blvd) and made a left. At the time, 28 widened to a 4-lane road beyond Estates, in front of the Tahoe Sands Resort. By the time we reached the Mourelato's motel on our way to the airport, smoke had crossed the road and all 4 lanes of traffic came to a dead standstill. We were forced to stop just downwind of the tree that was burning like a torch and could feel the heat of blaze through our closed car windows. Needless to say, with the smoke and heat we felt a sense of panic of wanting to get out of there as fast as we could. However, visibility was limited and, as previously stated, all 4 lanes were stopped. Fortunately, traffic did begin to move a few minutes later and we were able to continue on to the airport safely via Highway 267.

Now imagine that it's not one tree burning, but hundreds of dead and dying trees along Highway 267 -- a huge fire that generates its own wind, leaps fire breaks and the highway itself so that both sides are burning. Now imagine a miles-long line of cars trying to get from Highway 28 to Truckee via even a 4-lane Highway 267 (the timing of which is unknown due to the fact that it must be financed and build by CalTrans) and encountering possibly hundreds of cars trying to make a left turn from the Martis Valley West project and, eventually, the Campgrounds along the fibreboard "freeway" at the top of Brockway Summit. The irony of this scenario is that the drivers most likely to get

out first while blocking or impeding the escape of North Lake Tahoe residents will be residents of the Martis Valley West project and the future Campgrounds.

This scenario is not far-fetched and is entirely possible. Do you really want to be responsible to the injury and death of residents of North Lake Tahoe and its visitors? And it's more than just "injury" -- just view some photos of burn victims and you'll see that these are not simple injuries that are quickly healed. PF71-1 cont.

Your decision will affect the health and lives of all of us who live at North Lake Tahoe, so please make your decision wisely.

With sincere regards,

Ken and Terry Yagura
kkyagura@gmail.com

PF71

Jen and Terry Yagura
July 2, 2016

PF71-1 The comment expresses support for a comment letter from the League to Save Lake Tahoe, MAP, and Sierra Watch. See comment letter PF65 and responses to comments PF65-1 through PF65-5. The comment pertains to fire evacuation safety. See Master Response 9, "Emergency Plan and Emergency Evacuation" in the Final EIR and response to comment PF13-8.

From: Stacy Wydra
To: Kathi Heckert
Cc: EJ Ivaldi; Paul Thompson; "Adrienne Graham" (algraham@surewest.net); Kurt Krieg (kkrieg@mountainsidepartners.com); Fran Ruger; Sydney Coatsworth; Suzanne Enslow; Richard Moorehead
Subject: FW: Martis Valley West Project
Date: Tuesday, July 5, 2016 5:53:21 PM
Attachments: image002.png

PF72

Email correspondence below.
Thanks!
Stacy

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

COUNTY OF Placer

From: Bruce Corey [mailto:coreyazwolf@aol.com]
Sent: Sunday, July 03, 2016 2:07 PM
To: Stacy Wydra
Subject: Martis Valley West Project

To Placer Planning:

Please deny the Martis Valley West Project. It is a terrible precedent for our area. I have lived in the Reno/Tahoe area for over 32 years and this development denies my children and grandchildren a big part of the natural beauty of the Tahoe Basin and ridge line and creates a potential safety hazard. PF72-1

Saving 6000 acres in Truckee isn't worth losing our ability to evacuate safely in case of a fire and general traffic gridlock in Tahoe and Truckee.

Thank you for your consideration

Bruce Corey

PF72

Bruce Corey
July 3, 2016

PF72-1 The comment expresses opposition to the project and requests denial. Comments regarding preferences for or against the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

PF73

From: Schroepfer Scott <schroepfer.tahoe@gmail.com>
Sent: Monday, July 04, 2016 7:58 AM
To: Kathi Heckert; bos@placer.gov
Subject: Save Lake Tahoe
Attachments: 16 06 30 LSLT MAP SW letter to Placer County Planning Commission re MVWP.pdf; ATT00001.htm

After attending two meetings regarding the Martis Valley West Project, we completely support the Save Lake Tahoe proposal and its potential impacts. PF73-1

Scott Schroepfer, Debra Schroepfer and family.
5656 Dodowah Rd Carnelian Bay
schroepfer.tahoe@gmail.com

PF73 Scott and Debra Schroepfer July 4, 2016

PF73-1 The comment expresses support for the position of the League to Save Lake Tahoe. Comments regarding preferences for or against the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. See comment letter PF65 and responses to comments PF65-1 through PF65-5.

Kathi Heckert

PF74

From:	Ellie <tahoellie@yahoo.com>
Sent:	Monday, July 04, 2016 10:51 AM
To:	Kathi Heckert
Cc:	Jennifer Montgomery
Subject:	Martis Valley West Parcel Specific Plan: New Fire Related information for consideration at Planning Commission hearingJuly 7, 2016
Attachments:	Final Final MSR PCWA Nrthst_9Octo2014_v7-3.pdf; July 4, 2106 Planning Commission Fire comments.pdf

Kathi, Please forward to Commissioners as soon as possible on July 5 allowing the them time to read comments before the hearing on July 7. Many Thanks

Dear Commissioners and Supervisor Montgomery, PF74-1
I have spoken with both Chief Schwartz and Chief Shadowens.

The comments attached are from research I have done and I am asking you to read before considering your
recommendation on the Martis Valley West Parcel Specific Plan FEIR at the July 7, 2016 continuation hearing.

Attached are my comments and reference documentation. Please read July 4 attachment first, the Final Northstar Municipal Service Review document is for reference of where I found information

Respectfully, Ellie Waller

There is much confusion and angst about fire protection and evacuation for the Martis Valley West Parcel Specific Plan (MVWPSP)

The MVWPSP FEIR and Placer County must explain the process so the public understands that public health and safety are sufficiently addressed and remove the fire districts from the current politically charged hotbed.

As requested by the Commissioners at the June 9, 2016 public hearing, I do not believe Northstar Fire or North Tahoe Fire District representatives will be providing any additional testimony on the Martis Valley West Parcel Specific Plan other than what has been provided to date in response to the Draft EIR. PF74-2

This is primarily due to the unknown will-serve issues as related to the Municipal Service Review (MSR). MSR future approval is necessary for determination of will-serve. (164 page report MSR attached).

The MVWPSP FEIR must also address the Placer Local Agency Formation Commission (LAFCO) process for the PWCA 4 Sphere of Influence (SOI) issues in the MSR for Northstar CSD and PCWA Zone 4 which was approved October 2014. The fire responsibility (through annexation of the area where Martis Valley West Parcel Specific Plan lies) **is a future approval cycle**. If annexation is approved, Northstar Service District could actually be the will-serve Fire District.

The MVWP Specific Plan cannot be recommended for approval until all water; sewer and fire will-serve issues are resolved.

The proposed MSR annexation for fire and water services under the SOI for Northstar Service District and the approval of the Martis Valley West Parcel Specific Plan do not meet the criteria established in the Cortese-Knox-Hertzberg Government Reorganization Act of 2000. The FEIR does not provide criteria and proof that the proposed Specific Plan adheres to LAFCO requirements so public services are not properly analyzed in the FEIR. PF74-3

The MVWPSP proposal is urban sprawl and should be DENIED and not considered under the SOI of the Northstar Community Service District. North Tahoe Fire District should not be will-serve either because the MVWPSP: endangers lives, disrupts habitat, will not provide affordable housing, efficiently extend government services and has several significant and unavoidable impacts based upon local conditions and circumstance with little to no mitigation.

The Cortese-Knox-Hertzberg Government Reorganization Act of 2000

Legislative Findings and Declarations

56001 The Legislature finds and declares that it is the **policy of the state to encourage orderly growth and development** which are essential to the social, fiscal, and economic well-being of the state.

The Legislature recognizes that the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open-space and prime agricultural lands, and efficiently extending government services.

The Legislature also recognizes that providing housing for persons and families of all incomes is an important factor in promoting orderly development.

Therefore, the Legislature further finds and declares that this policy should be effected by the logical formation and modification of the boundaries of local agencies, with a preference granted to accommodating additional growth within, or through the expansion of, the boundaries of those local agencies which can best accommodate and provide necessary governmental services and housing for persons and families of all incomes in the most efficient manner feasible.

The Legislature recognizes that urban population densities and intensive residential, commercial, and industrial development necessitate a broad spectrum and high level of community services and controls. The Legislature also recognizes that when areas become urbanized to the extent that they need the full range of community services, priorities are required to be established regarding the type and levels of services that the residents of an urban community need and desire, that community service priorities be established by weighing the total community service needs against the total financial resources available for securing community services; and that those community service priorities are required to reflect local circumstances, conditions, and limited financial resources.

The Legislature finds and declares that a single multipurpose governmental agency is accountable for community service needs and financial resources and, therefore, may be the best mechanism for establishing community service priorities especially in urban areas.

Nonetheless, the Legislature recognizes the critical role of many limited purpose agencies, especially in rural communities. The Legislature also finds that, whether governmental services are proposed to be provided by a single-purpose agency, several agencies, or a multipurpose agency, responsibility should be given to the agency or agencies that can best provide government services.

56301 Among the **purposes of a commission** are discouraging urban sprawl, preserving open-space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances. One of the objects of the commission is to make studies and to obtain and furnish information which will contribute to the logical and reasonable development of local agencies in each county and to shape the development of local agencies so as to advantageously provide for the present and future needs of each county and its communities.

When the formation of a new government entity is proposed, a commission shall make a determination as to whether existing agencies can feasibly provide the needed service or services in a more efficient and accountable manner. If a new single-purpose agency is deemed necessary, the commission shall consider reorganization with other single-purpose agencies that provide related services.

56325 1. While serving on the commission, all commission members shall exercise their **independent judgment** on behalf of the interests of residents, property owners, and the public as a whole in furthering the purposes of this division. Any member appointed on behalf of local governments shall represent the interests of the public as a whole and not solely the interests of the appointing authority. This section does not require the abstention of any member on any matter, nor does it create a right of action in any person.

www.calafco.org

CALAFCO

PF74-3 cont.

The MVWPSP can be accomplished on the EAST parcel (as analyzed in the Martis Valley Community Plan update 2003). The FEIR added an East parcel alternative without conservation easement which could be added to make Alternative 5 the environmentally superior alternative.

The FEIR must be re-circulated for comment on the newly released Alternative 5.

PF74-4

The FEIR fails to provide proof of burden to serve the proposed Martis Valley West Parcel Specific Plan for many public services.

The Martis Valley West Parcel Specific Plan as proposed and the Commission's recommendation must be DENIAL of the project.

Supporting documentation from LAFCO meetings, comments on the MSR and October 2014 approval are provided below.

Specific citation in Appendix 1 (Final MSR) Memorandum of Understanding clearly states that potable water is the only service to be provided by Northstar Service District. PF74-5

potable water service and will succeed to all of the rights, duties, and obligations of the Agency for that purpose within Zone No. 4. This includes the enforcement, performance, or payment of any outstanding bonds, including revenue bonds, or other contracts and obligations of the Zone No. 4 associated with potable water service.

2.2.2 Annexation of Zone No. 4 Territory. The District will annex the territory within Zone No. 4 for purposes of providing potable water service only. The agencies that provide other services to Zone No. 4 (for example, wastewater disposal, fire protection and road maintenance) will continue to do so, and NCSD shall not be responsible for those other services. Any new indebtedness or liability incurred by the District as the successor agency will be the obligation solely of the territory to be annexed.

2.2.3 Establishment of New District Zone. In accordance with applicable law, the District may establish one or more new zones to encompass the annexed territory within Zone No. 4.

2.2.4 Transfer of Water System. Fee title to the Zone No. 4 Water System, which consists of the facilities described in Exhibit "B" and any additions that are made thereto from time to time ("Water System"), will be transferred to the District as the successor agency for the purpose of providing potable water service following the effective date of the annexation of the Agency's Zone No. 4 potable water service.

2.2.5 Completion and Transfer of Maintenance Center. Notwithstanding Article 2.2.4 above, the Agency will be responsible for completing construction of the Maintenance Center. The Maintenance Center will be considered part of the Water System and will be transferred to the District as the successor agency as soon as it has been accepted as complete by the Agency.

2.2.6 Completion and Transfer of Ongoing Facilities Agreements. Notwithstanding Article 2.2.4 above, the Agency will be responsible for enforcing, managing and completion of existing facilities agreements with developers in Zone No. 4 for construction of new water facilities, unless otherwise agreed by the Parties. Once these facilities have been completed and accepted by the Agency, these facilities will be considered part of the Water System and will be transferred to the District as the successor agency. The Agency agrees to confer and consult with the District during the time period these facilities are being completed.

2.2.7 Continuation of Service. Until the Effective Date, the District will continue to be responsible for the maintenance and operation of the Water System, as provided for in the Existing Contract. On the Effective Date, the Existing Contract will be deemed terminated, any other notice of which is hereby waived by the Agency and the District; provided that the indemnity obligations of each party under the Existing Contract shall not be terminated. As of the Effective Date, as the successor agency, the District will be responsible in accordance with its powers under the CSD law, for the maintenance and operation of the Water System, and compliance of the Water System with applicable standards, including but not limited to the applicable California Department of Health Public Drinking Water System standards, and for providing potable water to the lands and inhabitants located within Zone No. 4.

DATE: September 3, 2014

TO: Chairman Weygandt, Commissioners Allen, Holmes, Kirby, Rudd, Treabess, Ucovich. Alternate Commissioners Duran, Gray, Nader, Sheehan.

FROM: Kris Berry, AICP, Executive Officer

SUBJECT: Martis Valley West Parcel Project

RECOMMENDATION:

Receive presentation for the Martis Valley West Parcel Project by Blake Riva of East West Partners.

SUMMARY:

The Martis Valley West Parcel Project, a proposed development in Martis Valley consists of two areas, the West Parcel is comprised of 1,192 acres adjacent to Northstar Resort and the East Parcel, a total of 6376 acres. Through the use of transfer of development rights, 760 of potential 1,360 residential units and 6.6 acres of the commercial area would be moved from the east parcel to the west parcel, and remaining development rights would be retired. No development would occur on the East Parcel and the entire 6,376 acres would become permanent open space. Conservation of the East Parcel will serve to connect over 50,000 acres of contiguous open space reaching from Martis Valley through the Mt. Rose Wilderness Area.

The West Parcel development area for the 760 residential units and the 6.6 acres of commercial area is approximately 775 acres. This area would have its own entrance located off of State Route 267 and would include over 14 miles of public trails. This parcel will require annexation into the Northstar Community Service District for provision of services.

A presentation will be made to the Commission by Blake Riva of East West Partners. Application materials have not been submitted to LAFCO at this time.

October 8, 2014
Item No. 6

PLACER COUNTY

LOCAL AGENCY FORMATION COMMISSION

110 Maple Street, Auburn California 95603 530-889-4097
Email: lafco@placer.ca.gov

STAFF REPORT

DATE: October 1, 2014

TO: Chairman Weygandt, Commissioners Allen, Holmes, Kirby, Rudd, Treabess, Ucovich. Alternate Commissioners Duran, Gray, Nader, Sheehan.

FROM: Kris Berry, AICP, Executive Officer

SUBJECT: Final Municipal Service Review for Northstar Community Service District and PCWA, Zone 4.

SUMMARY

This is a noticed public hearing to consider the Final Municipal Service Review (MSR) for Northstar CSD and PCWA Zone 4.

A previous MSR for the Tahoe/Martis Valley area, including Northstar CSD and PCWA Zone 4 was approved by the Commission in 2004. This MSR Update was prepared to insure current information for analysis. Although, an amendment to the Sphere of Influence is not proposed at this time, it is anticipated that Northstar CSD and PCWA will soon submit an application to LAFCO to allow Zone 4 to be annexed into the Northstar CSD.

The Commission held a public meeting on the Draft MSR Update on August 28, 2014. The Commission and the public were encouraged to provide comments for staff to review and possibly incorporate into the final document. Seven letters providing comments on the Draft MSR Update were received during the public comment period from August 8, 2014 to September 19, 2014. These comment letters are shown in Chapter 5 of the MSR along with responses to those comments. Staff believes that the Final Municipal Services Review addresses these comments.

PF74-5 cont.

Page 10 of 164 of Final MSR

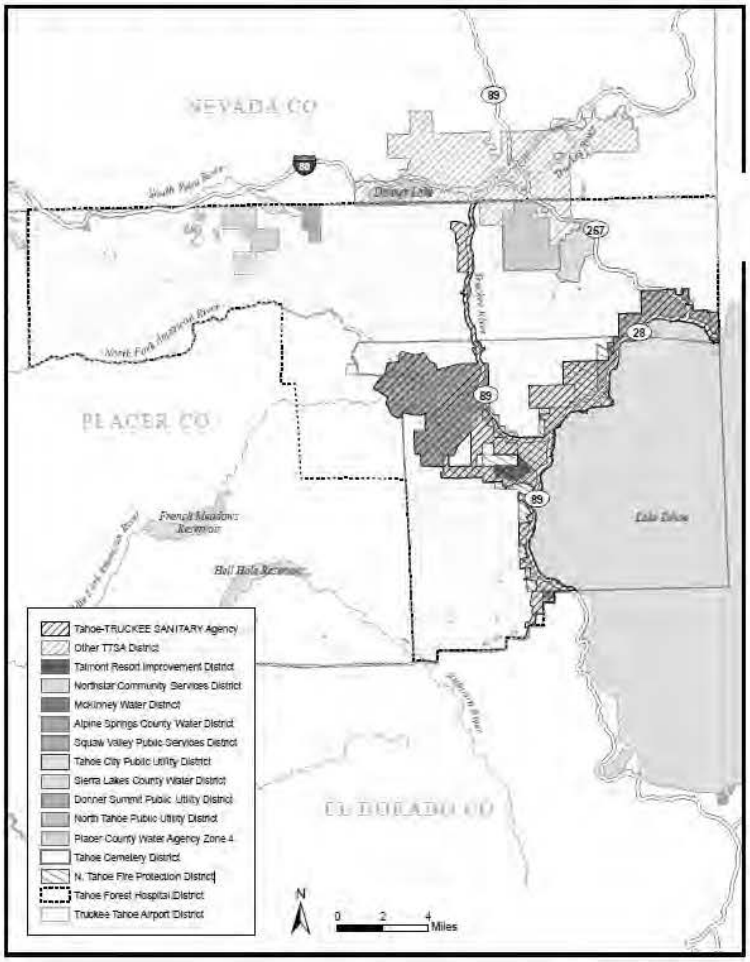


Figure 2 -1 **REGIONAL MAP**

PF74-5 cont.

Page 24 of 164 of Final MSR

3.1.2 Summary Description of Existing Services

The Northstar CSD provides water, wastewater, solid waste (including recycling), fire/emergency (including forest fuels management), and roadway services (including snow removal, road maintenance, trails, and street lighting) within its service area. See Figure 3.1 for District boundary and SOI.

PF 74-5 cont.

The CSD primarily serves the Northstar California resort (formerly known as Northstar-at-Tahoe). This resort community was first developed in the early 1970s as a winter recreation resort and has since grown and expanded to provide year-round recreational activities, private homes and condominiums, and commercial development. Northstar California resort's recreational opportunities include skiing, snowboarding, hiking, biking, an 18-hole golf course and recreational trails that connect to the regional trail system. Northstar Village is the commercial center and includes retail areas, commercial uses, parking and circulation, pedestrian areas, restaurants, residential uses, open space, and recreation areas. The Northstar Community Services District (NCSD) was formed in 1990 to provide public services to the resort community.

3.2 District Characteristics

3.2.1 Location and Size

The Northstar Community Services District (NCSD) serves the resort community of Northstar, which is located south of Highway 267. NCSD covers approximately 1,900 acres and currently serves a population that fluctuates between 130 permanent residents and a weekend/seasonal population of 12,000 during peak recreation periods (Placer County, 2011). The District services residences, a commercial area, golf course and ski slopes.

The 2003 Update to the Martis Valley Community Plan (MVCP) was incorporated into the Placer County General Plan and established the land uses for the area within the Northstar CSD, as well as surrounding areas. A 2005 legal agreement between Northstar Resort and conservation groups further defines developable areas and habitat conservation areas. On June 9, 2014 Placer County released the Northstar Mountain Master Plan Final Environmental Impact Report (Final EIR) (Placer County, 2013).

3.2.2 Formation and Boundary

On November 5, 1990, LAFCO adopted Resolution No. 8-90 thereby approving the formation of the Northstar CSD to provide services to the Northstar resort community. The District is governed by a five-member board with day-to-day operations managed by a General Manager. Prior to its formation, the area was served by Placer County.

The Northstar Fire Department was formed in 1972 under a Placer County Community Services Area (CSA) governed by the Placer County Board of Supervisors. It was absorbed into the CSD in 1990, as a Division.

Final MSR for Northstar CSD and PCWA
October 2014
Page 19

The Northstar Master Plan does not include the Martis valley West Parcel Specific Plan. The Martis Valley Community Plan (update 2003) identifies the East Parcel for development not the West parcel as proposed in MVWPSP.

Page 25 of 164 of Final MSR

PF74-5 cont.

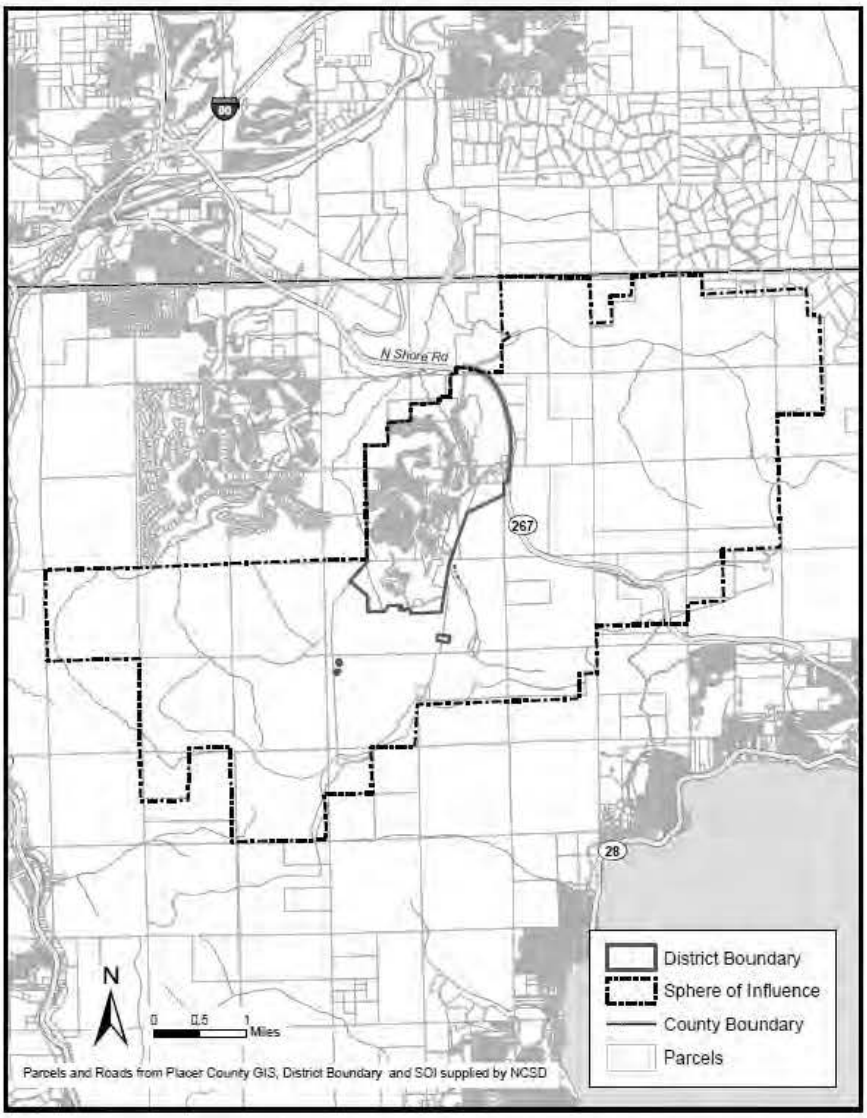


Figure 3 -1 **NORTHSTAR COMMUNITY SERVICE DISTRICT**

Page 26 of 164 Final MSR
Provision for water service only

BOUNDARY HISTORY
The Northstar CSD was formed and assumed water, wastewater collection, and fire protection services from Placer County in 1990. Since that time, there have been three annexations: 1.1 acres in 2006, 6.0 acres in 2010 and 1.6 acres in 2012. Current District boundaries encompass approximately 1,846 acres.

SPHERE OF INFLUENCE
The District's sphere of influence (SOI) covers an area much larger than its boundaries, extending up to the Nevada County line to the northeast of current boundaries (Figure 3.1). The current SOI contains 15,872 acres and includes substantial timber and forestry zoned mountain areas to the west and south of the Northstar resort. These areas are part of the Northstar ski area, but are not otherwise populated. See "Projected Growth and Development" discussion below for more information regarding potential for development within the SOI.

PF74-5 cont.

In 2000, LAFCO initiated an SOI update for Northstar CSD and Truckee Sanitary District (TSD). However, due to unresolved questions of sewer services between the two Districts, the update was put on hold indefinitely. Those differences have since been worked through and an agreement put in place to address conflicts.

For the provision of water services only, the District has indicated that they do not feel the current SOI is adequate for future water service needs and has requested assistance from LAFCO to resolve the issue. The SOI could potentially be modified to include areas of proposed new growth and to exclude those areas where growth will never occur, provided certain conditions are met and the Commission approves. An expansion of the District's service area into the SOI has been proposed by various developers and entities to include a number of surrounding developments. See "Areas of Interest" and "Projected Growth and Population" sections below for additional detail.

EXTRA-TERRITORIAL SERVICES
The District does not provide any extra-territorial services with the exception of PCWA's Zone 4. The NCSD currently operates PCWA's Zone 4 water system under contract, an area which is located outside of the District's current SOI. Discussions are taking place as to the possible annexation of Zone 4 into the NCSD (see "Areas of Interest" below for additional detail).

AREAS OF INTEREST
Placer County Water Agency's (PCWA) Zone 4 is operated under contract by NCSD and is isolated from the rest of the PCWA system by geography, watershed, and climate. PCWA's Zone 4 boundary is coterminous with NCSD's boundary to the west, and is coterminous with NCSD's SOI on two sides (Figure 2-1).

Zone 4 was established in the late 1990s by PCWA to provide water services to Placer County developments in Martis Valley, southeast of Truckee, and is located west of Northstar CSD. The sole source of water for Zone 4 is groundwater from the Martis Valley groundwater basin. Zone 4 is located outside of both the NCSD's service area and SOI.

Final MSR for Northstar CSD and PCWA
October 2014
Page 21

Page 58 of 164

The annexation of Sphere of Influence fire services has not been approved.

FIRE AND EMERGENCY SERVICES

a) Currently, infrastructure and facilities being used by the Northstar Community Services District are considered sufficient to allow for efficient provision of services both in the present and the anticipated buildout of Northstar. However, potential annexations of pending developments will require a reassessment of fire and emergency service provision to ensure the District maintains its current high level of service.

b) Northstar Community Service District has historically met or exceeded all applicable industry standards related to the provision of fire and emergency services, as reflected by the current (2013) ISO rating of 3, the best among fire districts in eastern Placer County. PF74-5 cont.

c) Although the District maintains mutual aid agreements and contingency plans with neighboring districts, the District should develop an emergency operations plan.

ROADS AND TRAILS

a) Northstar CSD's road maintenance section appears to be adequately organized. Infrastructure for roadway services consists of maintenance equipment and related storage facilities. Roadways are owned by and the responsibility of Placer County. The District believes that the current level funding provided by Placer County for road maintenance is not sufficient to sustain the required level of service and maintenance

b) As the area grows, it will be important for the County and the CSD to work together to ensure that funding is available to accommodate maintenance of roads given increased wear and tear on roads and any increase in road mileage.

Final MSR for Northstar CSD and PCWA
October 2014
Page 53

CHAPTER 5.0 COMMENTS RECEIVED & RESPONSES

This Chapter includes the comments that members of the public offered on the Draft MSR. The consulting team and LAFCO staff have provided responses to the comments and have made minor refinements to the text of the MSR as appropriate to address those comments.

5.1 Overview of Comments Received on Draft MSR

Placer LAFCO prepared and circulated a public review Draft MSR for Northstar CSD and PCWA Zone 4 located within the unincorporated and eastern portion of Placer County. The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH Act) requires a minimum 21-day public review period for draft MSR's. The LAFCO Commission formally opened the public comment period on the Draft MSR during their August 13, 2014, public hearing. The Draft MSR was posted on Placer LAFCO's website on August 27, 2014. A formal notice of availability for the Draft MSR was distributed on August 27, 2014. The public comment period formally closed on September 19, 2014; although comments were accepted until September 26, 2014. Additionally, informal comments were accepted between September 27 to October 3, 2014. This resulted in an overall public comment period on the Draft MSR of six weeks. The following comments were submitted on the Draft MSR: PF74-5 cont.

Table 5.1: List of Comments Received on Draft MSR

Comment Letter Number	Agency/Group that Submitted Comments	Author (signature)	Date of Comment Letter
A	Northstar Resort	Andrew Strain	Sept 26
B	North Tahoe Fire Protection District	Michael Schwartz	Sept 25
C	Placer County Executive Office	David Boesch	Sept 18
D	Stoel Rives LLP	Greg Gatto	Sept 18
E	Tahoe Truckee Sanitation Agency	Marica Beals	Sept 26
F	Truckee Donner PUD	Kathleen Neus	Sept 4
G	Truckee Sanitary District	Blake Tresan	Sept 25
H	Tahoe Truckee Sanitation Agency	Marcia Beals	October 3, 2014
I	Northstar Resorts	Jennifer Hill	October 3, 2014
J	North Tahoe Public Utility District	Paul Schmitt	September 29, 2014

NORTH TAHOE FIRE PROTECTION DISTRICT **Michael S. Schwartz, Fire Chief**

P.O. Box 5879
222 Fairway Drive
Tahoe City, CA 96145
530.583.6913
Fax 530.583.6909

Letter # "B"

PF74-5 cont.

September 25, 2014

Kris Berry, Executive Director
Placer Local Agency Formation Commission
110 Maple Street
Auburn CA 95603

RE: Draft Municipal Service Review for Northstar Community Service District and PCWA Zone 4

Executive Director Berry:

B-1 Please accept our late comments, as our notice was miss-addressed and postmarked on the date the comments were due (see attached).

B-2 North Tahoe Fire Protection District has no comments requiring changes to the Draft Municipal Services Review for Northstar Community Service District and PCWA Zone 4. However, we would request clarification or comments, as appropriate, attached to the review that acknowledge certain services, or the potential for future impact to services, currently provided by North Tahoe Fire Protection District.

B-3 North Tahoe Fire Protection District has the exclusive right to serve specific areas of operation within Placer County as the sole 9-1-1 emergency ambulance provider. This Exclusive Operating Area (EOA) includes the area along California State Route 267 extending North from the intersection at State Route 28 in Kings Beach to the intersection at Northstar Drive in Truckee.

B-4 Included in Section 3.2.2 is a discussion regarding the status of the proposed Martis Valley West Parcel Specific Plan. Due to the close proximity of the project to our District and within our Ambulance services Exclusive Operating Area (EOA), the North Tahoe Fire Protection Districts is concerned about future service demands on both our ambulance and fire services.

I appreciate the opportunity to provide comment on this Draft Municipa Service Review. Should you have any questions or concerns please contact me.

Respectfully,

Michael Schwartz
Fire Chief

Response to comment # B. North Tahoe Fire Protection District, Michael Schwartz, Sept. 25, 2014

B-1: Please accept our apologies that the notice of public hearing for this MSR was somehow delayed in reaching you. Your letter is included in this Final MSR and your comments have been considered herein.

B-2: Comment noted.

B-3: Thank you for calling this to our attention. It is acknowledged that consistent with Placer County's Ambulance and Medical Transportation Ordinance, the North Tahoe Fire Protection District has the exclusive right to serve as the sole 9-1-1 emergency ambulance provider within specific areas of operation. LAFCO's consultants are currently in the process of preparing a MSR for North Tahoe Fire and this forthcoming MSR will include this information.

PF74-5 cont.

B-4: Section 3.2.2 does provide a brief discussion of the proposed Martis Valley West Parcel Specific Plan as it relates to the provision of services by the Northstar CSD. When the forthcoming MSR on the North Tahoe Fire Protection District is prepared, it will include a brief discussion on the District's ability to accommodate growth within its boundaries, including areas within its areas of operation for ambulance service. The MSR will be focused on the district. Discussion of potential environmental or other impacts related to the Specific Plan are better addressed through a CEQA document and the District is invited to contact the Placer County Community Development Resources Agency at:
http://www.placer.ca.gov/departments/community-development

Final MSR for Northstar CSD and PCWA
October 2014
Page 88

The FEIR fails to provide adequate information that will-serve can or will be met through annexation into the SOI of the Northstar Community Service District and must be denied as proposed.

BOARD OF DIRECTORS
Robert W. Mulder, DDS
Jerry Sarchet
Brian Kent Shum
Ron Swan
Nancy Dangy

TRUCKEE SANITARY DISTRICT
A PUBLIC AGENCY

BLAKE R. TRESAN, P.E.
General Manager
Chief Engineer

12304 Joerger Dr • Truckee, California 96161-3312
Telephone (530) 587-3894 • Fax (530) 587-1440

PF74-5 cont.

September 25, 2014

Letter # "G"

Placer County LAFCo
Kris Berry, Executive Officer
110 Maple Street
Auburn, CA 95603

Subject: Comments on Draft Municipal Service Review for Northstar CSD and PCWA Zone 4 dated August 8, 2014

The Truckee Sanitary District (TSD) appreciates the opportunity to review the above-referenced document. Preliminary comments are indicated below. Any additional comments will be provided in writing at a later date or at the October 8 public hearing.

Table 1.1

G-1 • TSD provides wastewater services in eastern Placer County and should be shown on the Table.

Figure 2.1

G-2 • Change TSD name to Truckee Sanitary District, not Truckee Sanitation District.
• Show T-TSA's service area?

Page 22, paragraph 2

G-3 • Change TSD name to Truckee Sanitary District, not Truckee Sanitation District.

Page 22, paragraph 4

G-4 • Although the Martis Valley West Parcel Project developer has proposed sewer service to be provided by NCSD, NCSD cannot currently provide sewer service to this area because this area is not included in the existing service agreement between TSD and NCSD. It should be noted that the current service agreement is a three-party agreement among TSD, NCSD, and the Trimont Land Company and that the Trimont Land Company is not part of the proposed Martis Valley West Parcel Project.

Page 40, Paragraph 1

G-5 • The 2005 agreement among TSD, NCSD, and Trimont Land Company limited NCSD to the provision of sewer service to its then current service area boundary plus four

Z:\USERS\Rebecca\Northstar MSR\Comments on Draft 9-25-2014.docx Page 1

specifically defined locations outside of the boundary. Per the agreement, extension of sewer service to these four areas outside of NCSD's service boundary required approval by TSD. Two of these locations have since been approved by TSD, annexed by NCSD, and are receiving sewer service.

G-6 • Change the reference here, and elsewhere in the MSR, from "transmission lines" to "collection pipelines".

Table 3-11

G-7 • The flows indicated in Table 3-11 appear to be inaccurate. TSD conveys approximately 2.0 million gallons of wastewater per day to T-TSA. In the Martis Valley outfall alone, the average daily flow is closer to 300,000 gpd.

G-8 • "Flows" are shown in the table, not "demands".

Page 40, Last Line

G-9 • Change the last sentence to state" "NCSD's ability to accommodate sewer flows is linked to the TSD's collection system capacity in that NCSD contracts with TSD for collection of NCSD's sewer flows to the T-TSA facility."

Page 40, Footnote 1

G-10 • Change TSD name to Truckee Sanitary District, not Truckee Sanitation District.

G-11 • Remove "shared" from last sentence.

Page 41, Multiple Locations

G-12 • Change TSD name to Truckee Sanitary District, not Truckee Sanitation District.

Page 41, Paragraph 1

G-13 • The Agreement between TSD and NCSD contains a variety of provisions, not all of which have been summarized in this paragraph. Please revises the paragraph to accurately state: "with TSD in 1992 (Agreement for Services with Truckee Sanitary District, 1992) that provided for collection of NCSD wastewater flow to the T-TSA facility through TSD-owned facilities on the terms and conditions set forth in that Agreement. There are no pending disagreements between the agencies at this time and the amendment seems to be working as intended."

Page 41, Paragraph 4

G-14 • Change sewer "distribution" system to sewer "collection" system.

Page 42, Paragraph 3

G-15 • The first two sentences in this paragraph refer to service boundaries, spheres of influence, and areas of concern. It is unclear exactly what area is being referenced. A map would be helpful to clarify which areas are being referenced.

G-16 • The T-TSA is a Placer LAFCo agency.

G-17 • The last sentence refers to NCSD and TSD applying for annexation of the same territory east of Northstar. Please indicate exactly what property is being referred to and when these applications for annexation occurred.

Page 42, Paragraph 4

G-18 • TSD did not oppose the annexation itself. According to TSD files, TSD questioned NCSD's determination that the annexation of NCSD territory to T-TSA was exempt from CEQA.

PF74-5 cont.

Z:\USERS\Rebecca\Northstar MSR\Comments on Draft 9-25-2014.docx Page 2

- This paragraph appears to make the assertion that if the lands of NCSD were annexed into T-TSA that NCSD would, by default, become a member agency of T-TSA. It is our understanding that to become a member agency of T-TSA, a change in the State legislation under which T-TSA was formed would be required. G-19

Page 42, Paragraph 5

- The 2005 amendment to the service agreement identified four specific areas where NCSD could extend service outside of the agreed upon boundary. It did not create a blanket process for extension of sewer service to other areas. It should be noted that, at a minimum, extension of service by NCSD to the Martis Valley West Parcel Project would require a new contract for service with TSD. G-20

Page 42, Paragraph 6

- The statement that "If the application for direct annexation of NCSD's area to T-TSA is approved, NCSD would continue to operate and maintain its wastewater collection system" is true. However, it should also be noted that conveyance of NCSD's wastewater to T-TSA would still require the continued use of the TSD sewer collection system and a contractual relationship with TSD. G-21

Page 42, Paragraph 7

- The second sentence should start, "These pipelines..." G-22
- The connection point to the TSD system would be more accurately described as the intersection of Hwy 267 and Truckee Airport Road. G-23
- In the second sentence, recommend replacing "... another pipeline..." with "... TSD-owned pipeline..." G-24
- The second sentence is, as referenced above, an over-simplification of the existing TSD-NCSD-Trimont agreement. Please delete the phrase "in which NCSD owns all capacity right except for 350,000 gpd", for example, this phrase fails to recognize the "first-come, first-served" principal in the agreement. G-25

Page 43, Paragraph 1

- TSD is analyzing the hydraulic capacity of its collection system and is in communication with NCSD regarding its sewer flows. As it currently stands, the two districts are working cooperatively and concurrently, but not jointly. G-26

The Truckee Sanitary District appreciates the opportunity to review this document. Should you have any questions or need clarification, please don't hesitate to contact us.

Sincerely,

Blake R. Trepan, PE
General Manager

Z:\USERS\Rebecca\Northstar MSR\Comments on Draft 9-25-2014.docx Page 3

PF74-5 cont.

The FEIR fails to provide adequate information that will-serve can or will be met through annexation into the SOI of the Northstar Community Service District and must be denied as proposed.

Response to Comment # G. Truckee Sanitary District, Blake Tresan, Sept 25, 2014

G-1: Please see response to comment #E-3.

G-2: Thank you for this correction. The MSR text has been amended to change references for "Truckee Sanitation District" to the correct "Truckee Sanitary District". Additionally, please note that a map of T-TSA's service area will be provided in a forthcoming MSR that will describe the public services provided by T-TSA in more detail. T-TSA is not the focus of this current MSR on PCWA and Northstar CSD.

G-3: Please see response to comment #G-2.

G-4: This comment clarifies that the proposed Martis Valley West Parcel Project's geographic territory is not currently included in the existing service agreement between TSD and NCSD. The referenced MSR text has been updated to note that Placer County is preparing an Environmental Impact Report (EIR) on the proposed project and this EIR will analyze how sewer service is to be provided to the project. PF74-5 cont.

G-5: This comment clarifies the nature of the 2005 agreement between the TSD, Trimont, and NCSD. The referenced text in the MSR has been refined to reflect this comment.

G-6: "Transmission lines" have been changed to "collection pipelines" in the MSR. Thank you for this correction.

G-7: The flows shown in Table 3-11 were calculated by Northstar CSD and provided to LAFCO in their 2013 Request for Information for this MSR. LAFCO defers to Northstar CSD on the accuracy of their calculations. However, we have added text to the MSR to reflect the information provided by TSD.

G-8: The table heading has been corrected to list "Flows" and to delete "Demand". Thank you for calling this correction to our attention.

G-9: The sentence referenced on page 40 of the MSR was refined as suggested by the commenter.

G-10: Please see response to comment #G-2.

G-11: The footnote referenced on page 40 of the MSR was refined to remove the word "shared" as suggested by the commenter.

G-12: Please see response to comment #G-2.

G-13: It is acknowledged that the Agreement between TSD and NCSD contains a variety of provisions and not all of those provisions have been summarized in this MSR. Several of the wording changes suggested by the commenter have been made in the MSR text, to the extent feasible.

G-14: The MSR text has been refined to change sewer "distribution" system to sewer "collection" system in the referenced paragraph as suggested by the commenter.

Final MSR for Northstar CSD and PCWA
October 2014
Page 124

G-15: The referenced sentences are clearly written. This paragraph correctly cites the primary source of information as follows:

PMC. (2013, February). *Sphere of Influence Update Truckee Sanitary District Draft EIR.* Retrieved January 18, 2014, from Nevada LAFCo: http://www.nvlafco.com/uploads/LAFCO%20Sphere%20Plan%20and%20Related%20Materials/DRAFT%20SPHERE%20PLAN%20UPDATE%20-%20Truckee%20Meadows%20Water%20Authority%20EIR%20Documents/Draft%20EIR%20Sphere%20Update.pdf

Also available at: http://www.placerlafco.com/uploads/docs/LAFCO%20Staff%20Reports/2013-14%20Final%20Draft%20TSD%20Sphere%20Plan%20Update%20Attachment.pdf

There are several maps in this cited EIR which show the referenced areas. Additional maps in this MSR are not necessary at this time. PF74-5 cont.

G-16: Thank you for noting this correction. The MSR text has been modified to note that the T-TSA is a Placer LAFCo agency.

G-17: Formation of the District and any associated annexations are discussed in Section 3.2.2 Formation and Boundary of this MSR. The comment ask for more detail regarding an application made to LAFCO and which was never acted upon or approved. Based upon our review of LAFCO's files, it appears that in July 2000, LAFCO noted that the sphere of infulence for the Truckee Sanitary District overlapped with the sphere of influence for Northstar CSD. An application to annex a portion of this sphere was originally submitted to LAFCO in 2001. LAFCO files are available to the public. If the commenter wishes more detailed information, they are welcome to review these files.

G-18: Comment noted. A sentence has been added to the MSR to clarify that "At that time, TSD questioned NCSD's determination that the annexation of NCSD territory to T-TSA was exempt from CEQA."

G-19: Comment noted. T-TSA offered similar comments. Please see comments and response to comments #E-7 and E-9 for more details.

G-20: Comment noted. A sentence has been added to the referenced paragraph as follows: "TSD has noted that an extension of service by NCSD to the Martis Valley West Parcel Project would require a new contract for service from TSD (TSD, 2014.)".

G-21: A sentence has been added to the referenced paragraph as follows: "Use of TSD's collection pipeline system by NCSD would continue to require a contractual relationship".

G-22: This sentence has been refined for purposes of clarification within the MSR text.

G-23: This sentence has been refined for purposes of clarification within the MSR text.

G-24: This correction has been made in the MSR text.

G-25: The phrase was deleted from the referenced paragraph.

G-26: The referenced sentence was clarified as suggested by the commenter.

Final MSR for Northstar CSD and PCWA
October 2014
Page 125

The FEIR fails to provide adequate information that will-serve can or will be met through annexation into the SOI of the Northstar Community Service District and must be denied as proposed.

Page three of MOU is provided to you earlier in this comment letter on Page 3 of 24

Appendix 1

MEMORANDUM OF UNDERSTANDING
BETWEEN PLACER COUNTY WATER AGENCY AND NORTHSTAR COMMUNITY SERVICES DISTRICT FOR THE ANNEXATION FOR WATER SERVICE OF THE AGENCY'S ZONE NO. 4

This memorandum of understanding (MOU) is made by and between the Placer County Water Agency (Agency), a California public agency created by the Placer County Water Agency Act (California Statutes 1957, Chapter 1234) and the Northstar Community Services District (District) a California local government formed and existing pursuant to the provisions of the Community Services District law (California Government Code Sections § *61000, et seq.)* (the CSD law).

PF74-5 cont.

RECITALS

WHEREAS, pursuant to the provisions of the Placer County Water Agency Act, the Agency established its Zone No. 4, the boundaries of which are set forth in Exhibit "A" attached hereto and incorporated herein by reference, for the purpose of providing potable water to the lands and inhabitants in Zone No. 4; and

WHEREAS, because of the distance of Zone No. 4 from the Agency's headquarters in Auburn, California and the proximity of Zone No. 4 to the District's boundaries, the Agency requested that the District assist in operating and maintaining the Zone No. 4 Water System for the Agency; and

WHEREAS, the Agency and the District entered into a contract for the operation and maintenance of the Agency's Zone No. 4 Water System dated October 27, 2009 and amended on December 16, 2010, April 7, 2011, and December 1, 2011 (the Existing Contract); and

WHEREAS, the District has operated and maintained the Zone No. 4 Water System in accordance with the terms and conditions of said contract; and

WHEREAS, the Agency and the District believe it to be in the public's best interest to seek reorganization of the Agency and District to allow the District to become the service provider of potable water to the lands and inhabitants located in Zone No. 4; and

WHEREAS, said reorganization is subject to the review and approval of the Placer County Local Agency Formation Commission (LAFCO); and

WHEREAS, the District is willing to pursue annexation of the territory located within Zone No. 4; and

WHEREAS, the Agency is willing to pursue the annexation by the District for potable water service for the territory located within Agency's Zone No. 4 and for the distribution of all of the remaining assets of Zone No. 4 to the District.

1037693.1 Rev 1

The FEIR fails to provide adequate information that will-serve for fire (public health and safety) can or will be met through annexation into the SOI of the Northstar Community Service District as the current MSR only covers potable water service only.

AGREEMENT

NOW, THEREFORE, it is agreed as follows:

ARTICLE 1

Local Agency Formation Commission Proceedings

1.1 Application for Changes of Organization. The District and the Agency will work together to prepare and submit an application to the LAFCO proposing the District's annexation for potable water service of the territory within the Agency's Zone No. 4. The Agency's Zone No. 4 would remain in place, with only the potable water service within being transferred to the District (Application).

1.1.1 The District and the Agency will work cooperatively to prepare the information required for the Application, as described in Government Code section 56652.

1.1.2 The District and the Agency will work cooperatively to prepare a resolution of application for the proposed changes of organization, as required by Government Code sections 56654 and 56700. The LAFCO will act as the conducting authority for the reorganization process. The Effective Date will be 60-days after LAFCO's recordation of a certificate of completion.

1.1.3 The District and the Agency will work cooperatively to prepare a Plan for Providing Services, as required by Government Code section 56653.

1.2 Cost of Preparing and Processing Application and Related Costs. Under LAFCO policies, the proponent of a change of organization is responsible for the cost of processing the proposal. The Agency shall be responsible for any such costs and shall provide the LAFCO with the initial deposit required to process the proposed changes of organization. Such costs include costs associated with environmental review under the California Environmental Quality Act, if any.

1.2.1 The Agency shall prepare and execute an Agreement to Pay Fees and Costs/Indemnification, as required under the LAFCO policies.

ARTICLE 2

Terms and Conditions of Annexation

2.1 Future Definitive Terms and Conditions. The Agency and the District will work cooperatively to identify mutually agreeable definitive terms and conditions for the District's annexation of the Zone No. 4 territory for the purpose of the District providing potable water service to Zone No. 4.

2.2 Agreement in Principle. The Agency and District agree in principle to the following terms and conditions for the annexation to the District of Zone No. 4 potable water service:

2.2.1 Designation of District as Successor for Potable Water Service. The District will be designated as the successor to Zone No. 4 only for the purposes of providing

PF74-5 cont.

1047768.1 ac 1

2

It should be noted that (3) three of the LAFCO Commissioners are Placer Board of Supervisors and can provide additional information on the LAFCO Final PCWA Zone 4 proposed annexation of the Marts Valley West Parcel Specific Plan and LAFCO process.

PF74-6

LAFCO COMMISSIONERS

County Members:

- **Jim Holmes, Chairman**
  Supervisor, District 3
  Term Expires May, 2018
- **Robert Weygandt**
  Supervisor, District 2
  Term Expires May, 2018
- **Jack Duran**, Alternate
  Supervisor, District 1
  Term Expires May 2018

City/Town Members:

- **Dr. Bill Kirby**
  Councilmember, City of Auburn
  Term Expires May, 2018
- **Stanley Nader**
  Councilmember, City of Lincoln
  Term Expires May, 2020
- **Vacant** , Alternate
  Councilmember, City of Rocklin
  Term Expires May, 2018

https://www.placer.ca.gov/departments/lafco

So, if it's not a Northstar Project and the current Northstar Community Service District agreement doesn't cover the real estate where the Martis Valley West Parcel Specific Plan is proposed (until future approval of Sphere of Influence in the PCWA Zone 4) and North Tahoe Fire are not the responsible response district, we the North Lake Tahoe and Truckee residents are left with no committed Fire protection and welfare of the constituents and visitors to Placer County.

The MVWPSP FEIR cannot be approved without a responsible Fire District accepting responsibility through proper documentation and process approvals.
You: The Placer County Planning Commissioners must recommend DENIAL of the Martis Valley West Parcel Specific Plan as proposed.

A recent point of reference for future potential fire issues.

http://www.latimes.com/local/lanow/la-me-ln-drought-dead-trees-20160622-snap-story.html

26 million trees have died in the Sierra since October, raising fire risk Dead and dying trees dot the lush landscape along the Merced River in March 2015. (Robert Gauthier / Los Angeles Times) Matt Stevens and Corina Knoll June 22, 2016

A lethal combination of drought, heat and voracious bark beetles has killed 26 million trees in the Sierra Nevada over the last eight months -- an alarming finding for a state already raging with wildfires fueled by desiccated landscapes. PF74-7

The dire estimate offered Wednesday by federal officials brings the loss of trees since 2010 to at least 66 million, a number that is expected to increase considerably throughout the year, despite an average winter of rain and snow that brought some relief to urban Californians.

"Tree dies-offs of this magnitude are unprecedented and increase the risk of catastrophic wildfires that puts property and lives at risk," Agriculture Secretary Tom Vilsack said in a statement.

U.S. Forest officials say 40 million trees died between 2010 and late 2015. In October, Gov. Jerry Brown declared a state of emergency and formed a tree-mortality task force to help mobilize additional resources for the safe removal of fallen and dying trees.

The latest number was reached after a May survey of six southern Sierra counties: Fresno, Kern, Madera, Mariposa, Tuolumne and Tulare

PF74-7 cont.

The Forest Service, which spent more than half its budget last year on fire management, plans to conduct additional surveys on tree mortality throughout the summer and fall.

In his statement, Vilsack called on Congress to address finances allocated for firefighting, warning that the agency will otherwise lack the necessary resources to address and restore the forests.

"Forcing the Forest Service to pay for massive wildfire disasters out of its preexisting fixed budget instead of from an emergency fund like all other natural disasters means there is not enough money left to do the very work that would help restore these high-mortality areas," he said. "We must fund wildfire suppression like other natural disasters in the country."

The rapid escalation of tree deaths should be considered a grave issue, threatening the collapse of an ecosystem that has made California the sixth-largest economy in the world, said Andy Lipkis, president and founder of TreePeople, an L.A.-based environmental advocacy nonprofit.

"We tend to think of trees as decoration," Lipkis said. "Unfortunately, we've forgotten that trees are the actual pillar of our life-support system, critical for our food, water, habitat -- for our air and for temperature stability."

Trees can help cool areas, but as evidenced by the record-setting temperatures this week in the Southland, Lipkis said, "we're heading rapidly in the other direction."

For fire officials, the dramatic loss of trees has them on edge.

PF74-7 cont.

"It doesn't necessarily mean more fires, but if a fire gets into those areas where there's massive tree die-off, it's going to be much faster and more intense," Cal Fire spokesman Daniel Berlant said. "It's going to be much harder for us to stop a fire in these dead forests, as opposed to when they were alive."

Berlant said that last week alone his agency responded to more than 250 fires. Crews are readying themselves for the summer and fall months when conditions are drier and the Santa Ana winds come into play.

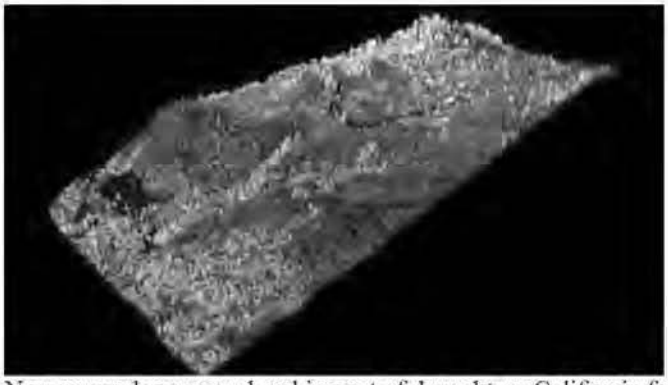
"A fire with those conditions in those tree mortality regions can be devastating," Berlant said. "We absolutely see it as a huge public safety risk."

Forest Service scientists believe the remaining trees need at least two years of normal or above-normal rain to fully regain their health. Water-starved trees are unable to produce their usual pitch or sap, the secretions that tend to protect them from fungi and insects. Bark beetles are notoriously fond of frail trees, burrowing destructive paths into limbs and trunks to mate and lay eggs.

Although the epicenter of the die-off is the southern Sierra Nevada, the march of death is rapidly moving north to places such as Lake Tahoe and Eldorado National Forest.

Environmental experts are not surprised by the latest number of tree deaths.

Trees that may have looked green and healthy last fall may have, in fact, been at death's door, said Adrian Das, a forest ecologist with the U.S. Geological Survey. And tree mortality will "lag" even after the drought ends, he said.



New maps show spread and impact of drought on California forests

PF74-7 cont.

Das, who works in Sequoia National Park, said dead trees are generally trees found at lower elevations, but that there is much to be learned in the field.

"Trees just don't die that often," he said.

There are also new forays to be made into the study of forest regeneration.

"If we're in a warmer climate, are we going to see the same forest come back in or is it going to change the landscape?" Das said. "These forests have been here a long time. You might not get the same thing that you had before. "

And then there is the issue of which types of trees should be planted in the areas where trees have died.

"We're doing a lot of reforestation right now," said Randy Moore, who oversees the Pacific Southwest region of the U.S. Forest Service. "Do we bring back pine, or another species? Do we want it to come back as chaparral?"

In a statement Wednesday, the Forest Service said it had committed to spending $32 million in California to restore trees along roads and recreation sites.

But limited resources mean it can be hard to strike a balance between planting trees and fighting fires. California's forests, Moore said, still contain "lots of material" for future blazes.

PF74

Ellie Waller
July 4, 2016

PF74-1 The comment refers to the substance of the letter and requests its consideration. Please see responses to comments PF74-2 through PF74-7.

PF74-2 The comment addresses fire protection and states that the fire responsibility (through annexation) is a future approval.

The MVWPSP is within the NCSD Sphere of Influence, but outside the current service area boundary. Therefore, as stated in Chapter 3, "Project Description," of the Draft EIR (page 3-25):

> After the approval of the Specific Plan and before the large lot final map is approved for recordation, the project applicant would apply for Local Agency Formation Commission (LAFCO) approval of annexation into the NCSD. NCSD is anticipated to provide water, sewer and wastewater treatment, fire and life safety, and some recreation services.

See also Table 3-8, MVWPSP Process and Required Permits and Authorizations, in the Final EIR. Table 3-8 lists the procedural steps in preparing the Specific Plan and the EIR, and the potential permits and approvals required for project implementation. These steps are listed in chronological order; however, the timing of the other project-related approvals by other agencies after EIR certification and project approval would be dependent on those permitting processes.

PF74-3 The comment states that proposed MSR [municipal service review] annexation for fire and water services under the SOI for Northstar Service District [sic] and the approval of the MVWPSP do not meet the criteria established in the Cortese-Knox-Hertzberg Government Reorganization Act of 2000. The comment suggests that the project should be denied and not considered under the SOI of the Northstar Community Services District, and the North Tahoe Fire District should not issue a will-serve letter. The comment highlights text in the Cortese-Knox Act. LAFCO will make a determination of whether the project is consistent with LAFCO annexation policies (which reflect the requirements of the Cortese-Knox Act) when considering annexation of the MVWPSP area to the NCSD service area. LAFCO will not consider annexation until after the County approves the MVWPSP.

PF74-4 The comment suggests that the project can be accomplished on the East Parcel and that the EIR should be recirculated for comment on Alternative 5. See response to comment IO31-45 and Master Response 1 in the Final EIR.

PF74-5 The comment suggests that the EIR fails to provide proof that the proposed MVWPSP could be adequately served by providers of many public services. The comment highlights text related to the LAFCO procedures and NCSD's municipal service review. Please see responses to comments PF74-2 and PF74-3. The municipal service review is a separate review process conducted by NCSD. The limitation on providing only water services refers only to the portion of PCWA Zone No. 4, which does not include the project area, not the entire NCSD SOI. Nothing in the 2014 MSR precludes NCSD from providing other services to areas outside of PCWA Zone No. 4 with fire and other services, if and when such an area is annexed into the District.

PF74-6 The comment suggests that the project cannot be approved prior to its acceptance by a responsible fire district. See response to comment PF74-2. Annexation into NCSD is included in Table 3-7, Required Permits and Authorizations, in the Draft EIR. Table 3-7 lists the potential permits and approvals required for project implementation.

PF74-7 The comment includes text from a newspaper article as a recent point of reference for future potential fire issues. The comment is acknowledged.

Kathi Heckert

From: Ron Grassi <ronsallygrassi@mac.com>
Sent: Monday, July 04, 2016 1:46 PM
To: Kathi Heckert
Subject: Martis Valley and Squaw Valley proposed projects

PF75

Dear Kathi: Would you please deliver this to the Planning Commissioners before Thursday? Thank you, Ron Grassi

Dear Planning Commissioners:

Good afternoon.

I'm Ron Grassi speaking on my own behalf. I oppose the Martis Valley (and Squaw Valley) projects.

I'm retired and have had a home in TC for approx. 35 years

I'm told that we had 4.5 million tourists visit Tahoe 7 years ago and I can only guess that number has increased dramatically over the past 7 years largely due to the increased availability of more homes and esp. more condos. PF75-1

I also see numerous articles in the Sierra Sun that our Lake clarity, or lack thereof, is primarily due to fine sediment finding its way into the Lake—caused by ongoing development, crushed dirt by cars on the highways and the ever increasing number of cars carrying more visitors to the Lake each year, and, while doing so, emitting tons of carbon monoxide into our air.

And I presently read that Squaw Valley and Martis Valley, if granted permits by this Board, will add possibly a thousand new homes and put over 2000 cars on the already overly congested roads on the North Shore.

Common sense tells me that the developers stand to make millions of dollars off these projects but the Lake won't be doing so well; it is suffering. And we all know this.

I'm not a land use planner but I wonder and am asking each of you a question: before we grant a permit for Martis Valley (and Squaw Valley) which will, without any doubt, increase our traffic jams and our pollution in both the air and the Lake, shouldn't we first be asking one question: Have we defined the Limit of growth, it's Carrying Capacity, for the Lake given our understandable environmental concerns? What is supposed to happen that will make you finally say…NO? PF75-2

Members of the Board: Do any of you dispute that we have traffic jams in several parts of the Lake which increase the difficulty of evacuation in the event of a fire? And which detract from the pleasure of living or visiting here? And which make it a nightmare to drive to and through cities like Tahoe City? When I first bought my home here we did not have such traffic jams. Now we have a virtual parking lot of cars stuck in traffic during 2 months in the summer, and each weekend in the winter. Do any of you dispute we've spent billions of dollars in the past 25 years trying to save the Lake's environment while encouraging millions of tourists to visit? This ongoing permitting has to end if we've reached the Lake's environmental limits.

So here's my question to each of you: which of you has a figure in mind (or formula or analysis telling you when and where to 'set the bar') beyond which we will stop granting permits for new homes and condos and hotels? If none, of you has any number or "end game" to this mad process of the unending issuance of permits, shouldn't we first come up with a plan that sets a limit? PF75-2 cont.

Sincerely, Ron Grassi
Tahoe City resident

PF75

Ron Grassi
July 4, 2016

PF75-1 The comment expresses opposition to the project. The comment cites articles in the Sierra Sun related to the clarity of Lake Tahoe. As stated in the staff report for the July 7 hearing, after receiving public testimony at the June 9, 2016 hearing, the Planning Commission requested additional information from County staff related to the potential effects of the proposed project on Lake Tahoe, fire evacuation and fire safety, and traffic operations on State Route 267. These issues are addressed in the EIR, the July 7 Planning Commission staff report, and the staff report attachments. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF75-2 The comment inquires as to whether carrying capacity for the Lake Tahoe region has been defined, and suggests that new approvals should cease if environmental limits have been reached. The comment is acknowledged. Impact 5-3 and cumulative impact 5-6 in the Draft EIR address the planned growth and development in the region.

FRIENDS OF THE WEST SHORE

SIERRA CLUB

Tahoe Area Sierra Club Group

PF76

Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603

July 4, 2016

Subject: Martis Valley West Parcel Specific Plan (PGPA 20130080), State Clearinghouse No. 2014032087

Dear Members of the Planning Commission:

The Friends of the West Shore (FOWS) and the Tahoe Area Sierra Club (TASC) appreciate the opportunity to provide additional comments regarding the proposed Martis Valley West Parcel Specific Plan (MVWPSP). While we have submitted extensive comments on the project and related environmental review,[1] many of which have not been sufficiently addressed (as noted in our comments on the FEIR), we provide the following comments based on the 6/30/2016 staff report. We also reiterate our previous requests that public comment be accepted at the hearing to comply with the Brown Act, especially in light of the inclusion of additional information in the 6/30 staff report. PF76-1

As the staff report notes, there are extensive concerns regarding the project's impacts on SR 267, including traffic and emergency operations, vehicle travel in the Tahoe Basin and associated water quality impacts to Lake Tahoe, and wildfire-related hazards. Attendance by representatives from affected local and state public service agencies was requested at the 6/9 hearing. It is unclear whether representatives will attend the 7/7 hearing, although the staff report notes Caltrans has already declined (p. 13).

The staff report provides additional information regarding three top issues discussed at the 6/9 hearing. We provide the following additional comments:

1) Impacts to Lake Tahoe

The EIR and staff reports acknowledge that increased VMT in the Tahoe Basin will generate additional particulates and nitrates/NOx pollution which impacts Lake Tahoe. This impact is dismissed based on the conclusion that the estimated in-Basin VMT will not cause a violation of TRPA's VMT threshold (although as our previous comments note there are significant deficiencies in the analysis of VMT impacts). Further, the staff report also focuses solely on particulate impacts and mid-lake clarity and refers to the Tahoe TMDL requirements as the means to address sediment deposition to the Lake (p. 5-7). However, the FEIR still neglects to evaluate and disclose the additional *nutrient* impacts (e.g. from vehicle NOx emissions), which have a greater impact on the nearshore of Lake Tahoe (the Tahoe TMDL does not address Tahoe's nearshore clarity). In fact, *nutrient* deposition was one of the concerns specifically repeated at the June 9 hearing. **The proposed project will generate pollution that will negatively impact the mid-lake and nearshore clarity of Lake Tahoe.** PF76-2

2) Fire evacuation and Forest Management

The staff report reiterates the final EIR's inclusion of the Emergency Preparedness Evacuation Plan (EPEP) in response to concerns about impacts to evacuation and emergency operations. However, as the staff report notes, the EPEP does not include areas within the Lake Tahoe Basin Management Unit (p. 7). The capacity of SR 267 to evacuate North Tahoe residents and visitors has not been analyzed or determined, nor has the project's impacts to such an evacuation been addressed. While it is imperative to coordinate with local and regional fire representatives, they do not have land use authority, and cannot request approval or denial of the MVWPSP project. None of the agencies listed on p. 8-9 in the staff report make land use decisions; that is the County's role. The record provides ample evidence that placing more people in the project area will exacerbate threats posed by wildfire. PF76-3

Sufficient information, let alone common sense, also indicates that adding more vehicles to the roadway during an evacuation will further delay evacuation times. **As proposed, the project places all existing and new residents and visitors to the North Tahoe/Truckee Region, as well as emergency responders, in further danger from natural hazards including fire.** We ask you to consider public health and safety as your first obligation to the public and deny this project unless and until these impacts have been adequately analyzed and mitigated. Claiming infeasibility or relying on speculative mitigation as is currently done by the FEIR is simply not an acceptable action by Placer County in terms of protecting the health and safety of its residents and visitors. PF76-3 cont.

3) Impacts to SR 267

Commissioners and members of the public also raised concerns about the project's "significant and unavoidable" impacts to traffic on SR 267. While the EIR discusses that widening the highway to four lanes (up to Brockway Summit) is expected to alleviate traffic congestion (outside of the Tahoe Basin), this highway project is not guaranteed, nor does Placer County have the authority to require Caltrans perform this project. The staff report discusses a June 23 meeting with Caltrans, however notes no new or persuasive information regarding this issue. The staff report simply reiterates the possible plans for roadway widening, and refers to future planning efforts of Caltrans where this topic may be discussed and public participation provided for. Because widening cannot be assured, staff is requesting that this impact be accepted through adoption of a Statement of Overriding Considerations. However, we remind you that unlike Caltrans or the CHP, Placer County does have the authority to prevent these impacts by delaying the approval of land use projects that will make the impacts worse until adequate measures are completed. We urge you to deny this project unless and until mitigation is constructed and implemented *prior to* adding significantly more traffic to our limited roadways. PF76-4

In summary, while the participation of agencies including Caltrans, the California Highway Patrol, local Fire Departments, and others is imperative, they do not have the authority to recommend approval or denial of land use projects. It is the County's responsibility to weigh the pros and cons of land use decisions. There is no doubt the project will increase congestion on our roadways, which are already overwhelmed during peak periods – a fact easily attested to by anyone in the area over this past Holiday weekend. It is also clear that this decision would further impede the use of SR 267 for evacuations and emergency access in the future. Finally, there is also no question that the MVWPSP will increase vehicle use within the Tahoe Basin, which will therefore increase particulate and nutrient loading to Lake Tahoe, thereby adversely affecting both nearshore and mid-lake clarity. Mitigation for these impacts is insufficient, and more measures should be evaluated to further reduce impacts. We urge you to deny the project as proposed. Additional work is needed to ensure all impacts have been adequately evaluated and all feasible measures have been included in any future proposed project and/or the project is amended to reduce impacts. PF76-5

We would be happy to meet with you to discuss our concerns. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net or Laurel Ames at amesl@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President
Friends of the West Shore

Laurel Ames,
Conservation Chair
Tahoe Area Sierra Club

Jennifer Quashnick,
Conservation Consultant

[1] Including 4/28/2014 NOP comments, 3/27 & 3/28/2015 (2nd) NOP comments, 12/20/2015 DEIR comments, and 6/6/2016 FEIR comments.

PF76

Susan Gearhart, Friends of the West Shore
Laurel Ames, Tahoe Area Sierra Club
Jennifer Quashnick, Friends of the West Shore
July 4, 2016

PF76-1 The comment states that previously submitted comments have not been sufficiently addressed. Responses to previous comments from Friends of the West Shore (FOWS) and Tahoe Area Sierra Club (TASC) are included in the Final EIR under Letters IO16, IO17, and IO18.

The comment requests that public comment be accepted at the July 7, 2016 hearing and reiterates request to have representatives from affected local and state public service agencies in attendance. At the direction of the Planning Commission, public comment was heard at its July 7, 2016 meeting, and public comments will be taken at the subsequent Board of Supervisors meeting on the proposed project.

PF76-2 The comment states that the Final EIR does not evaluate the nutrient impacts to Lake Tahoe, particularly mid-lake and nearshore clarity. Please see the discussion under "TRPA Thresholds" in Master Response 2 in the Final EIR. See also Master Response 6 in the Final EIR, which addressed the analysis of the TRPA environmental carrying capacity VMT threshold in recent EIRs and EISs in the Tahoe Basin. As discussed in the Master Responses and the staff report for the July 7 Planning Commission hearing, the project would generate trips that would contribute to in-Basin VMT, but it would not result in an exceedance of the VMT, adopted as a means to ensure adequate visibility, an element of the air quality threshold. As described in the State CEQA Guidelines (Section 15204(a), the adequacy of an EIR is determined in terms of that is reasonably feasible, in light of factors such as the magnitude of the project at issues, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

PF76-3 The comment raises concerns regarding fire hazard and evacuation. Please see Final EIR Master Response 9 related to wildland fire, emergency evacuation, and the draft Emergency Preparedness and Evacuation Plan prepared as part of the MVWPSP. See also response to comment PF13-8, which addresses this issue.

PF76-4 The comment expresses opposition to the project and cites specific concerns about traffic impacts on SR 267. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

PF76-5 The comment summarizes the concerns raised in comments PF71-1 through PF71-4. See responses thereto. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

The comment states that the timing and terms of construction of water and sewer infrastructure for the MVWPSP are to be developed and memorialized in a development/facilities agreement between the District and the developer. The comment is acknowledged.

PF77

From: Boyce [mailto:popsmeister@gmail.com]
Sent: Monday, July 04, 2016 3:13 PM
To: Teri Ivaldi
Subject: Martis Valley Housing Project

IT IS INSANE. GREED ON STEROIDS. THE CURRENT OR FUTURE TRANSPORTATION SYSTEM AT TAHOE WILL NOT SUPPORT IT IN YOUR WILDEST DREAMS.

IF APPROVED IT WILL BE THE DIRECTLY RESPONSIBLE FOR AN UNTOLD NUMBER OF DEATHS FROM A CATASTROPHIC FIRE IN THE TAHOE BASIN. PF77-1

Sent from my iPad

Boyce Williams
Popsmeister@gmail.com

PF77

Boyce Williams
July 4, 2016

PF77-1 The comment suggests that the current or future transportation system at Tahoe will not support the proposed project and expresses concerns regarding potential catastrophic fires. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR 10, "Transportation and Circulation," as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

From: Sandy's Yahoo <craftycampion@yahoo.com>
Sent: Monday, July 04, 2016 9:09 PM
To: Kathi Heckert
Subject: Martis Valley West

PF78

MARTIS Valley West must be stopped! PF78-1

PF78

Unsigned (Sandy's Yahoo)
July 4, 2016

PF78-1 The comment expresses opposition to the project. Comments regarding preference for or against the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

From: Stacy Wydra
To: Kathi Heckert; EJ Ivaldi; Paul Thompson; Shirlee Herrington
Cc: Fran Ruger; Sydney Coatsworth; Suzanne Enslow; Kurt Krieg (kkrieg@mountainsidepartners.com); "Adrienne Graham" (algraham@surewest.net)
Subject: FW: Martis Valley West Plan-please vote NO
Date: Tuesday, July 5, 2016 3:24:22 PM
Attachments: image003.png

PF79

Hello All –
Please see the correspondence below regarding the MVWPSP. Kathi, please forward to the PC and the DRC, thanks!!!
Stacy

Stacy Wydra
****

Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard
P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

From: Janice Eggers [mailto:jandpeggers@gmail.com]
Sent: Tuesday, July 05, 2016 3:15 PM
To: Placer County Planning; Stacy Wydra; Jennifer Montgomery
Subject: Martis Valley West Plan-please vote NO

I would like to make sure that this gets to the following commissioners before Thursday, July 7's meeting:

- Richard Roccucci, District 1
- Fred Arcuri, District 2
- Richard Johnson, District 3
- Jeffrey Moss, District 4
- Miner (Mickey) Gray, District 5
- Larry Sevison, At-Large East of Sierra Crest Wayne Nader, At-Large West of Sierra Crest

PF79-1

Dear Planning Commission,

I am writing to you once again to voice my concern over the Martis Valley West development.

In the May 2016 issue of our local small paper, Moonshine Ink, the following articles were written:

- Tahoe Regional Planning Agency sponsored community open house on traffic issues May 17
- Keeping Tahoe Local article-housing issues for local families
- Where has our town gone?
- Housing Solutions-making the pieces fit

PF79-1 cont.

Just per these headlines, one can infer that the community of Tahoe is already experiencing issues with housing for local employees, housing for local families, and of course, traffic on roads that are not equipped to serve the amount of people visiting our area.

Last year, the League to Save Lake Tahoe confirmed that 5000 pounds of trash was collected off the beaches throughout the year, and 2300 pounds immediately after 4th of July. This was picked up by volunteers who are dedicated in saving and preserving Lake Tahoe. I wonder what this year's number will be after a record hitting 4th of July this last weekend.

Today, I did a housing search on www.realtor.com in the following areas under single family homes, lots, and condos. Here is what I found:

- 76 properties Kings Beach
- 47 properties Tahoe Vista
- 167 properties Tahoe City
- 368 properties Incline Village
- 973 properties Truckee

These add up to 1631 properties available in our region. With this in mind, I am uncertain why Placer County is even considering adding in another development to our area. Especially, a gated community. There is already a market for the buyers out there that want a second home.

The article in the Sierra Sun, http://www.sierrasun.com/news/22791458-113/opinion-martis-valley-west-brockway-campground-projects-are, is right on with many concerns of local citizens. I hope that you have the time to read this editorial.

Lastly, in the staff report by Stacy Wydra, I am horrified by the statements in the end of the report:

- The Development Agreement is in conformity with public convenience, general welfare and good land use practice. (Not my convenience; this will add in at least another 10 minutes to my commute for work to Truckee, which has already been expanded by 10 minutes due to the stoplights on 267. Not to mention delays of up to half an hour or more in the winter time. Not my general welfare; we already experience traffic, parking problems, and need to shop early in the am during the winter and summer so that we do not have to stand in lines in the grocery stores, gas stations, or getting a cup of coffee. Moving the large amount of dirt and taking out

PF79-2

the vast number of trees is not good land use practice. It will most likely look like a clear cut.)

The Development Agreement will not be detrimental to the health, safety, and general welfare for persons residing in the County and is in good land use practice. (This is by far totally false. More people will now need to be served by our already busy police, fire departments, and other local authorities. My safety, and all of my neighbors will be hazardous and potentially life threatening during a wildfire. There is no way that everyone will be able to evacuate in the timed 1.3 hours of the EIR's report. There is no possibility that if my home were to burn, that I would be able to replace my home for the materials and hours we built with our sweat equity and hard earned money.) PF79-2

I did not move to the Tahoe area 20 years ago to be in a city. What these planners are proposing, is a city. Lake Tahoe is a mountain area for people to experience mountain living, without all of the comforts of a city. To be in peace, harmony, and in the middle of nature, is often the reason for their visit to this area. If this goes through, it will destroy Tahoe. Economically, and physically. It will also destroy our quality of life, which does not have a monetary value.

Please do the right thing for our community. Vote no on the Martis Valley West development.

Sincerely,
Janice Eggers

PF79

Janice Eggers
July 5, 2016

PF79-1 The comment suggests that it can be inferred from local newspaper articles that the Tahoe area is experiencing issues regarding housing for local employees, housing for families, and local traffic. The comment addresses trash pick-up by volunteers during a previous July 4 holiday period. The comment expresses opposition to the project.

PF79-2 The comment address statements in the staff report regarding the Development Agreement and expresses opposition to the project. Comments regarding preferences for or against the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

From: John Baker <sharkbaker@gmail.com>
Sent: Tuesday, July 05, 2016 9:11 AM
To: Kathi Heckert
Subject: Martis Valley West & Brockway Campground

PF80

Mrs Heckert:

I am sending you this e-mail regarding the upcoming Placer County Planning Commission hearing of Wednesday July 7th because I will be unable to attend the meeting in person. I would appreciate if you would make sure all Commission members have an opportunity to read my comments before the meeting.

I am already on the record as one of the 41 speakers who spoke at the previous meeting at Grandlibakken expressing my concerns and asking the Commissioners to recommend a **no** vote on both projects to the Board of Supervisors. It was obvious that the residents of North Lake Tahoe attending spoke aggressively against these 2 developments for obvious reasons. It was very apparent the commissioners were unable to make any recommendations due to having too many concerns and un-answered questions related to wildfire safety,traffic impacts on HWY 267, public safety and cumulative impacts to our beloved basin.

What concerns me the most is that the 7 members of the Planning Commission could negatively effect the lives of over 5,000 of us residents who have expressed a solid **NO** vote on the Martis Valley West Project and Brockway Campground. Please remember we are all taxing paying residents of Placer County and we selected this beautiful area to live and enjoy life. You can support us as fellow residents by voting not to recommend approval of these 2 bad developments to the Board of Supervisors. PF80-1

Please remember my closing words at the last meeting;" To paraphrase the facts, it took God 2 to 3 million years to create the "Jewel of Sierras." Don't let man and his development projects ruin it in less that 100 years."

Kathi, thank you in advance for your attention to this matter

Sincerely

John Baker
Carnelian

PF80

John Baker
July 5, 2016

PF80-1 The comment expresses opposition to the project. Comments regarding preferences for or against the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

PF81

From: Mike Schwartz <backcountrystore@gmail.com>
Sent: Tuesday, July 05, 2016 9:28 AM
To: Kathi Heckert; Placer County Board of Supervisors
Subject: local Tahoe City Resident

Hello
I have lost all respect for local land managers that they would consider such a ridiculous ruining of the Tahoe north shore area with a huge campground at Martis Peak, not to mention some gigantic gated community. One TRPA jackass at a meeting I went to last summer told me outside: "this project will definitely go through...there are only 44 campground sites in the north shore". Um...., that is not true, there are thousands. Does this guy live in Auburn?

The "Truckee Triangle" between hwy 89 and 267 is a precious recreation block that we all use to enjoy the Lake Tahoe environment, and your talking about bringing in hundreds of RVers to drive all over it? are you serious? what for? It's a tiny space of land with a couple of crowded trails in the Nordic center. Your talking about adding HUNDREDS of cars from campers and home owners. No one should drive back there other than in emergency situations, or to access the Watson Lake campsites. A few more here and there are ok. The balance works right now. I live there and am back there often. But to add hundreds of RVers? Just to make Placer County some more tax revenue? Go screw up your own neighborhoods please. PF81-1

Can't Placer County and TRPA fix some of the existing long standing recreation problems around Lake Tahoe before creating 20 more? Our bike paths are silly and incomplete. We have no place to park in he winter to access the mountains. Traffic is already at a gridlock every day of the summer. It's just too crowded already this close to the lake and the Truckee Triangle already.

My business would BENEFIT from more people clogging Martis Peak. But I still think your on crack to consider this project. People don't need to live and camp in such a crowded and dangerous spot. And I don't want to flee from a fire, which would happen for sure sometime soon. 800 campsites right in that unhealthy dead tree forest behind all of our houses? Holy shit! And I guess I would say goodbye to driving over hwy 267 in the summer. It's already dangerous cresting that hill. What happens when big RV's are constantly stopping at the top? That couldn't possibly work! Get a clue! Build campsites a few miles away if you really feel the need to pack more RV's into Tahoe. They will still come use them and not know the difference. It's not like you get a lake view or lake access from Martis Peak.

And who profits from all this? Placer County and some private developer. Very sad.

Mike Schwartz
The Backcountry
mike@thebackcountry.net
shipping - 11400 Donner Pass Rd.Truckee CA 96161
bill to - PO Box 6706 Tahoe City CA 96145
Truckee Store: (530) 582-0909
Squaw Store: (530) 581-4707

PF81

Mike Schwartz
July 5, 2016

PF81-1 The comment expresses opposition to the project, citing concerns related to traffic, emergency evacuation, and safety. These issues are evaluated in the EIR. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

The comment also expresses opposition to campsites, which presumably refers to the Brockway Campground Project, a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal.

Kathi Heckert

From: Diane Morrison <tahoe.rose10@gmail.com>
Sent: Tuesday, July 05, 2016 9:53 AM
To: Kathi Heckert
Subject: Joint Comment Letter to Planning Commiision

PF82

We are in favor of the joint letter to the planning commission for all of the stated reasons.

Safety is of utmost importance in cases of fire and/or natural disaster. Our infrastructure cannot support mass evacuation. PF82-1

We also fear for our bears; they Are Our bears and a part of our natural environment. What ever will be done when they roam into into territory that has been theirs for so long and find a horde of people? And what will the people do?

Thank you.

Diane R and James S Morrison.

PF82

Diane R. and James S. Morrison
July 5, 2016

PF82-1 The comment expresses support for a comment letter, which is assumed to be from the League to Save Lake Tahoe, MAP, and Sierra Watch. See comment letter PF65 and responses to comments PF65-1 through PF65-5. The comment addresses fire evacuation safety. This issue is addressed in the Final EIR in Master Response 9, "Emergency Plan and Emergency Evacuation." Please see Master Response 9 in Section 3.1.9 of the Final EIR. See also response to comment PF13-8, which addresses this issue.

Kathi Heckert

From: MaryAnne Casella <macasella1@gmail.com>
Sent: Tuesday, July 05, 2016 10:46 AM
To: Kathi Heckert; Placer County Board of Supervisors
Subject: Short Note

PF83

You've GOT to stop saying "yes" to these irrational developers ideas!!

Tahoe basin roads are already at capacity, & at gridlock on busy weekends. These Martis Valley proposals are too dense for our area. I support the thoughts in the June 30th letter from the League, MAP & Sierra Watch. PF83-1

If you want to approve a camp ground (good idea) — how about re-conditioning the closed campground at Sandy Beach. People can walk to the beach from there!

Respectfully,
MaryAnne Casella

217 Laurel Dr.
Tahoe Vista, CA

PF83

MaryAnn Casella
July 5, 2016

PF83-1 The comment expresses support for a comment letter from the League to Save Lake Tahoe, MAP, and Sierra Watch. See comment letter PF65 and responses to comments PF65-1 through PF65-5. The comment addresses fire evacuation safety. This issue is addressed in the Final EIR in Master Response 9, "Emergency Plan and Emergency Evacuation." Please see Master Response 9 in Section 3.1.9 of the Final EIR. See also response to comment PF13-8, which addresses this issue.

The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

The comment indirectly expresses opposition to the Brockway Campground Project, a proposal for which environmental review has not yet commenced, and which will be within the jurisdiction and decision-making authority of both TRPA and Placer County. The Draft EIR considers the campground in the cumulative analysis. Please see Master Response 2 of the Final EIR regarding the Brockway proposal.

Kathi Heckert

PF84

From: Megan Chillemi <megan@chillemi.com>
Sent: Tuesday, July 05, 2016 11:43 AM
To: Kathi Heckert
Cc: 'Megan Chillemi'
Subject: Martis Valley West Parcel Plan

Dear Kathi - I am in full support of the recommendations that were made by my fellow NTRAC team members at the May 12th meeting. The Martis West Parcel Development Project is the most troubling project I have seen during my nine years serving on NTRAC, with significant and irreversible impacts to the Martis Valley and the Tahoe Basin for decades to come.

This project would change the complexion of the North Shore, increase air and water pollution, impact night skies, pose a life-threatening situation to residents in fire emergencies, and exacerbate the already unacceptable traffic congestion on Highways 267 and 28. I am also very concerned on water usage, particularly conserving the Martis Valley aquifer and existing water tables, and protecting wildlife and hiking trails. PF84-1

Further, there has been no more information forthcoming from the developer on what constitutes an "unit", as I was told "until such time that development has begun". Is a "unit" a 7,000 square foot estate home, or a 750 square foot condominium? What other "unintended consequences" will result from this development?

I again encourage a re-review of the EIR, and suspension or denial of this project until further study can be completed.

Megan Chillemi,
Seat 1, NTRAC
8819 Cutthroat Avenue
Kings Beach, CA 96143

PF84 Megan Chillemi July 5, 2016

PF84-1 The comment expresses opposition to the project, citing concerns related to air quality, water quality, night skies, traffic, emergency evacuation, and safety. These issues are evaluated in the EIR. Regarding the types of units that would be developed, specific development plans, such as small lot tentative maps, have not yet been proposed. As described in Appendix A of the MVWPSP, a variety of units would be allowed, including condominiums, fractional homes, townhomes, duplexes, triplexes and single-family residences. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

PF85

From: Ron Grassi <ronsallygrassi@mac.com>
Sent: Tuesday, July 05, 2016 12:29 PM
To: Kathi Heckert; Placer County Planning; Placer County Environmental Coordination Services
Cc: Jmtornese@aol.com Winters; Ellie Waller
Subject: Please Reject the Martis Valley proposal

Placer County Board of Supervisors:

I am writing to express my DISAPPROVAL of the Martis Valley West Project and to urge you to deny its progress. The Lake Tahoe basin is already impacted with more development than the holding capacity of the area. Our roads are congested, the lake continues to lose clarity, the environment is threatened and wildfires are a continued concern. Ridge top development on sensitive land is what Martis Valley West is all about. This is not smart development but destructible use of the land that is such an important part of the Lake Tahoe basin. The proposed building site is a watershed, animal habitat, ridgeline (which affects views and light pollution), and allows the loss of thousands of trees. This is a devastation of our environment and the gem that is Lake Tahoe. Please deny this project! PF85-1
Thank you for your attention to this letter.

Sincerely,

Sally Grassi

450 Jackpine
Tahoe City

PF85

Sally Grassi
July 5, 2016

PF85-1 The comment expresses opposition to the project, citing concerns related to air quality, water quality, biological resources, views and night skies, traffic, emergency evacuation, and environmental consequences to the Lake Tahoe Basin. These issues are evaluated in the EIR. It should be noted that, as described in Section 1.5.3 of Chapter 1, "Introduction," of the Draft EIR, the MVWPSP does not propose any changes to lands within the Lake Tahoe Basin that fall under the jurisdiction of TRPA. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

From: Al and Sue Weston <asweston@weston-me.com>
Sent: Tuesday, July 05, 2016 3:35 PM
To: Kathi Heckert
Cc: Sharlet Pyne
Subject: Martis Valley West

PF86

Kathi Heckert,

My name is Al Weston, and along with my wife Sue, we have owned our home that we built in Carnelian Bay for 35 years. We have been full time residents for the last 16 of those years.

Please forward the article below regarding wild fires to the Placer County Planning Commissioners.

We have been following the Martis Valley West proposed development along with the proposed campground in the same area and have attended two meetings on the subject development, the last of which was a 8 ½ hour marathon. It is hard to believe that the planning commissioners would ever give this project any consideration of approval near the ridge top location between the most scenic lake basin in the USA and the development of North Star. If approved it will be a disaster in waiting. It won't be a matter of if a fire happens, but when it will happen. Today, I understand there is a fire at Squaw Valley and it appeared that almost every fire truck in the basin was headed towards the fire while highway 28 between Cedar Flat and Tahoe City was clogged with cars, either still trying to leave the basin after the 4th of July Holiday, or simply traveling into Tahoe City. It took me 35 minutes to travel 4 miles from my house to the Tahoe City Golf Course. You can just imagine what highway 267 would be like with a fire between the basin & Truckee. PF86-1

Thank you,
Al Weston
4019 Robert Ave
Carnelian Bay, CA

Wildfire in the West has become an uncontrollable force

A former fire dispatcher says last year's fire season pushed firefighters to the edge

Allison Linville Opinion July 5, 2016 Web Exclusive

Wildfire in the West has become an uncontrollable force - High Country News

1

Note: the opinions expressed in this column are those of the writer and do not necessarily reflect those of High Country News, its board or staff. If you'd like to share an opinion piece of your own, please write Betsy Marston at betsym@hcn.org.

It was midsummer in 2015, and the aircraft-dispatch board behind me was covered in scrawled phone numbers. Twenty-five aircraft managers were working the record-breaking fire season on the Idaho Panhandle, my first season as an aircraft dispatcher. Phones rang constantly, radios added their chatter, and every computer screen displayed maps of fires, weather or the location of airplanes.

For the Idaho Panhandle National Forest, 2015 ranked as the biggest fire year since 1926. Decades ago, a large fire was anything over 500 acres. These days, 500 acres would be considered small, and it's not unusual anymore to see a fire torch 4,000 acres in just a few hours. Recent history tells us there's a new trajectory for wildfire – toward fires that no one can understand, predict or "control." PF86-1 cont.

According to the National Interagency Fire Center, based in Boise, the five worst years in wildfire history all occurred in the last decade. At one point in 2015, there were 27,000 firefighters trying to put out blazes across the West. In the dispatch center on the Idaho Panhandle, we worked 12-hour days, six days a week, from July until October. Our job was to move the necessary pieces — the aircraft, crews, and equipment — to whatever places fire managers and incident commanders told us to. And that summer, it was an almost endless job.

Flames of the 2013 Rim Fire in the Stanislaus National Forest.
Mike McMillan/U.S. Forest Service

Like everyone working in fire last year, we were exhausted, overworked and overwhelmed.

In Montana, fire managers were watching fire models and using their extensive training and experience to manage fires just as they always had, only to have people on the ground begging them to understand that they were seeing something totally different. "Their models weren't showing what a beast it actually was," said a firefighter on the Flathead National Forest. She was talking about a fire that she barely escaped before it blew up. PF86-1 cont.

It occurred to me last August that wildfires have become qualitatively different. And it was a disturbing thought, the realization that no one had the ability to manage fire anymore. Fire managers can't understand the fires we have today, because their training and experience are no longer relevant to modern-day fires.

Given the conditions now piling up — hot summers, long fire seasons, low snowpack, heavy fuel loading, an ignorant public, erratic storms — there is simply not enough education or experience available to help teach a fire manager what to do. It's not the managers' fault; it's not any one person's fault.

People with 30 years of experience are seeing things they've never seen on fires before. No one in 2014 could believe or understand all of the extreme fire behavior they saw that year,

and then the erratic fires of 2015 surprised them again. This is not a manageable force of nature, and no one is qualified to manage it, because it's never existed before.

When I've mentioned this to people who are not involved in fighting fire, I can see on their faces that they won't, or can't, believe me. Most people continue to think that we still have to put out every fire — an outdated idea — but even more worrisome is the fact that many people, including the fire managers themselves, apparently do not yet realize what wildfire has become, an unprecedented force. PF86-1 cont.

I am afraid of this force, and of the idea that we can still handle it. I recently left Forest Service dispatch for a variety of reasons, but one was that I was amazed we hadn't had any fatalities on the national forest that year. *Amazed.*

I don't think it is necessary to always send crews in to save people's homes or other structures. Sometimes, the most effective way to manage fire is to just keep people out of danger. The risk to firefighters is always present, but the risk now seems elevated beyond comprehension.

In order to avoid losing lives in this time of unprecedented fire behavior, fire managers — and all Westerners — need to recognize that there is no model for what we are already seeing this summer. The wildfire that destroyed 200 homes and killed an older couple near Lake Isabella, California, this June travelled 11 miles in its first 13 hours. "It was like a tornado," a homeowner told the Associated Press, "but it was fire."

The power of modern wildfire is astonishing and horrifying, and it far surpasses any previous experience or knowledge. Welcome to the future.

Allison Linville is a contributor to Writers on the Range, the opinion service of High Country News. *She lives in Montana.*

PF86

Al Weston
July 5, 2016

PF86-1 The comment expresses concerns related to traffic on SR 267 and emergency evacuation. Traffic and roadway safety issues are evaluated in the EIR; see Draft EIR Chapter 10, "Transportation and Circulation," as well as Final EIR Master Responses 5, 6, and 9, which address trip generation, vehicle miles traveled, and emergency evacuation.

The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

From: Josselyn Robertson <jossrobertson@yahoo.com>
Sent: Tuesday, July 05, 2016 3:41 PM
To: Kathi Heckert
Subject: Martis Valley West

PF87

This is just a note to say that I will not be able to attend the meeting on Thursday but would be standing totally against this development. You know all the reasons to deny it so I don't need to make you read a long email. Basically it is unbelievable to me that people in our government are not trying to protect Lake Tahoe. Once this sort of development takes place you can't remove it! Where do you stop? PF87-1

Please deny Martis Valley West!

Josselyn Robertson
200 harbor
Brockway

PF87

Josselyn Robertson
July 5, 2016

PF87-1 The comment expresses opposition to the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

MEMORANDUM

PF88

TO: Stacy Wydra, Placer County CDRA

FROM: Adrienne Graham, AICP

DATE: July 5, 2016

SUBJECT: Comparison of Actual and Projected Traffic Volumes on SR 267

In response to concerns regarding the extent of traffic congestion on SR 267, LSC has prepared an overview of expansion plans and funding for SR 267. As explained in the attached memo, the expansion of the majority of SR 267 to four lanes has been included in a number of traffic improvement plans, including those prepared by Caltrans, Truckee, Placer County, Placer County Transportation Planning Agency and Nevada County. Traffic impact fees have been collected from new development to fund the portion of the widening attributable to new development. As is the case with many improvement projects on State-owned facilities, a portion of the funding would need to be provided through the State or other funding processes as State law limits the amount able to be collected from new development. PF88-1

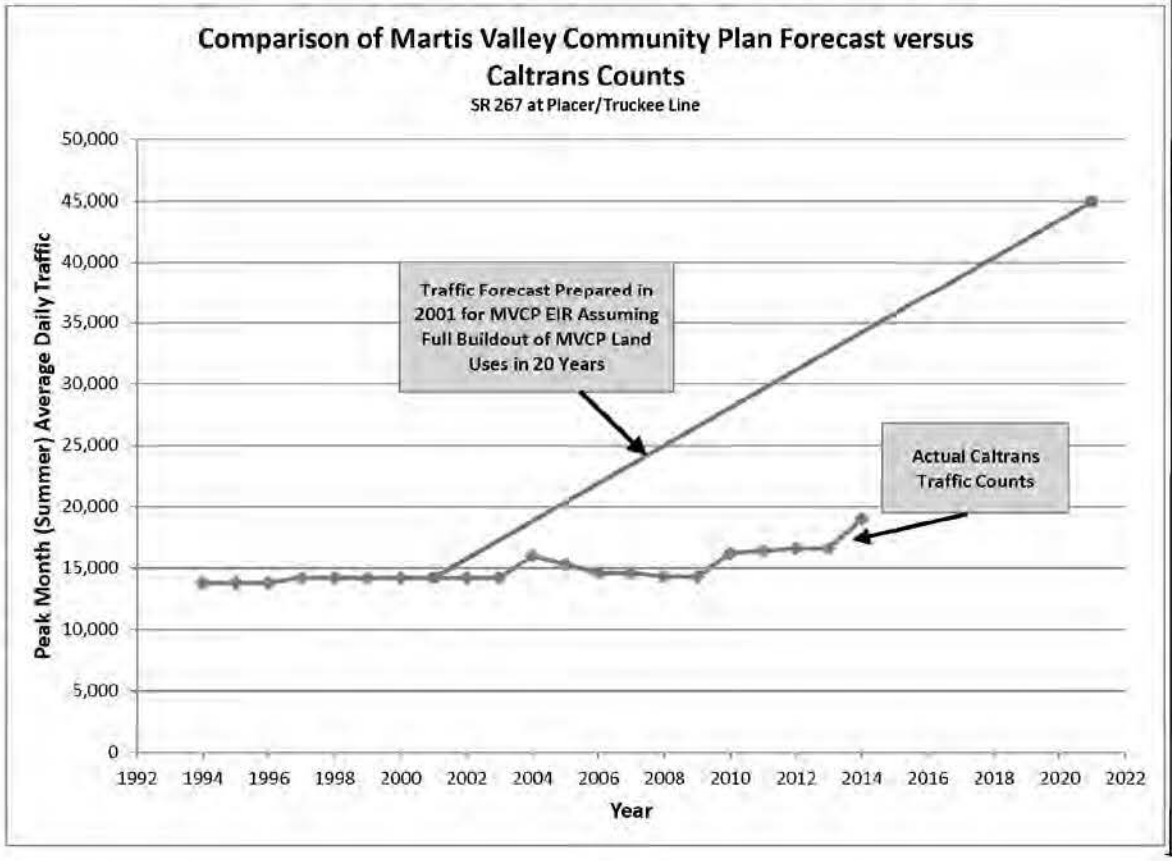
LSC has also prepared the attached comparison of actual increases (based on Caltrans count data) in traffic volumes to those projected for the Martis Valley Community Plan. Typical of a traffic analysis, the forecast for the MVCP EIR assumed full buildout of Martis Valley land uses in 20 years (2021), as well as through-traffic growth.

That forecast indicated that there would be 44,960 daily trips by 2021, an increase of about 30,000 trips over 2001 volumes. Current traffic volumes are under 20,000 daily trips, an increase of about 5,000 trips per day, or only 1/6 the total increase anticipated in the MVCP. The DEIR did not forecast for any intervening year, but LSC has depicted a straight-line projection. The 2014 traffic volume shown in Caltrans data is only 56 percent of the forecast line for 2014, far below anticipated levels. PF88-2

There are numerous reasons that traffic growth has not been as high as predicted in the MVCP EIR include permanent reductions in approved land use, slower absorption rates, and limited growth in Tahoe. The MVWPSP would contribute to this lower growth level by removing from the potential development pool 600 units anticipated in the MVCP to be developed.

Please forward the attached memo to the Planning Commission, and let us know if you have any questions.

Thank you.


Comparison of Martis Valley Community Plan Forecast versus Caltrans Counts
SR 267 at Placer/Truckee Line
Peak Month (Summer) Average Daily Traffic
50,000
45,000
40,000
35,000
30,000
25,000
20,000
15,000
10,000
5,000
0
1992
1994
1996
1998
2000
2002
2004
2006
2008
2010
2012
2014
2016
2018
2020
2022
Year
Traffic Forecast Prepared in 2001 for MVCP EIR Assuming Full Buildout of MVCP Land Uses in 20 Years
Actual Caltrans Traffic Counts

PF88-2 cont.

TRANSPORTATION PLANNING AND
TRAFFIC ENGINEERING CONSULTANTS

2690 Lake Forest Road, Suite C
Post Office Box 5875
Tahoe City, California 96145
(530) 583-4053 FAX: (530) 583-5966
info@lsctahoe.com
www.lsctrans.com

PF88-3

MEMORANDUM

To: Kurt Krieg, Mountainside Partners

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

Date: June 30, 2016

RE: SR 267 Expansion Plans

Per your request, this memo documents the existing plans and current funding strategies for roadway widening improvements along State Route (SR) 267. Roadway widening along the state highway is considered in the following plans.

Caltrans

Caltrans' facility plans are defined in "Transportation Concept Reports" (TCRs). They define both a "concept facility" (necessary to achieve the future concept Level of Service) as well as an "ultimate facility". The 2004 TCR identified the following:

Segment	Concept LOS	Concept Facility	Ultimate Facility
I-80 to Placer Line	E	2-lane expressway	4-lane expressway
Placer Line to Brockway Summit	E	2-lane highway	4-lane highway
Brockway Summit to SR 28	E	2-lane highway	2-lane highway with truck climbing lane

The 2012 version of the TCR uses a different format. The Concept LOS is changed to D for all segments. It identifies the following planned roadway widening improvements, and provides costs estimates:

- Widen to 4 lanes from Brockway Road to Placer Line ($3,500,000)
- Widen to 4 lanes from Placer Line to Northstar Drive ($10,000,000)

It also includes a southbound truck climbing lane from Northstar Drive to Brockway Summit as a "conceptual project" with no costs identified.

Placer County

Expansion of much of SR 267 in Martis Valley to four lanes has long been part of Placer County's plans. The Martis Valley Area Plan (December 2003) states *"The future traffic projections at full buildout of Martis Valley and Town of Truckee indicate SR 267 will need four-lanes from Waddle Ranch to the intersection of Brockway Road and Joerger Drive. Within a 20-year projection SR 267 may not require four-lanes for the entire segment listed above; however, the segment from Schaffer Mill and Airport Road intersection to the intersection of Brockway Road and Joerger Drive is projected to have four-lanes. Also within 20-years, signalization and intersection improvements will be required at Northstar Drive and SR 267."* The MVWPSP DEIR on one level is therefore simply confirming what has been expected for many years. PF88-3 cont.

Placer County Transportation Planning Agency (PCTPA)

The PCTPA is responsible for preparing the Regional Transportation Plan (RTP) for all of Placer County. The most recent version of this document, prepared in 2010, indicates the following improvement on SR 267 *"In eastern Placer County, widen SR 267 from 2 lanes to 4 lanes from the Nevada County line to Northstar Drive."* This is planned to be complete by 2025.

Town of Truckee

The Circulation Element of the Town of Truckee's *2025 General Plan* includes the addition of northbound and southbound lanes on SR 267 between Truckee Airport Road and Brockway Road/Soaring Way. Timing for this improvement is indicated as "long range".

Nevada County Transportation Commission (NCTC)

Paralleling the PCTPA in Placer County, the NCTC prepares the RTP for all of Nevada County. The most recent completed document (2010) includes widening to four lanes for SR 267 from Brockway Road to the Placer County line. The estimated date of construction is identified as "2020-2030", with funding provided by the Truckee TIF program (discussed below) as well as "local funding".

Tahoe Metropolitan Planning Organization (TMPO)

The Regional Transportation Plan for the Tahoe Region is entitled "Linking Tahoe" and was last updated in 2012. There are no plan elements included that would widen SR 267 within the Tahoe Basin.

Existing Funding Programs

Placer County has long been collecting fees for widening of 267. The County Department of Public Works has split the county into various districts for traffic fee collections, with all areas east of the Sierra Crest in the "Tahoe District". The current (December 2014) fee program includes the following:

Segment	Improvement	Est. Total Cost	County Traffic Fee Funding
Truckee Line – Brockway	4 lanes/Intersection Improvements	$32,433,700	$18,555,700

PF88-3 cont.

Truckee's Traffic Fee Program (last updated in February 2016) also includes widening of 267 to four lanes from Brockway Road to the Placer line, with a total estimated cost of $4,100,000 and a TIF total collection of $3,280,000.

Based on an agreement between the Town and Placer County first implemented in 2007, fees collected in eastern Placer County reflect impacts of Town growth and vice-versa. Since the total fees and impacts on both sides of the boundary are very similar, the agreement states that no actual funds are exchanged, but payment of fees in one jurisdiction helps to address impacts in the other. Between the two fee programs, ultimately (if overall growth projections are achieved) a total of $21,835,700 will be collected for widening of 267, which will pay for 60% of the total costs.

The ability to generate roadway expansion funds through traffic impact fees is constrained by state law. As defined in Assembly Bill 1600 and subsequently codified in California Government Code Section 66000 – 66008, impact fee programs can only collect the proportion of total improvement costs that have a "rational nexus" to the development within the jurisdiction imposing the fees. As some of the future growth in traffic on SR 267 is through traffic not associated with growth in Placer County or Truckee, these impact fee programs cannot generate 100 percent of the necessary funding.

No specific funding sources have been identified for the remaining 40 percent of expansion costs. Funding programs commonly used for roadway expansion in California include the Federal Regional Surface Transportation Program (RSTP) and the State Transportation Improvement Program (STIP). The Placer County RTP forecasts a total of $137,100,000 in RSTP funds available for countywide programs between 2010 and 2035, as well as $427,600,000 in STIP funds, for a total of $564,700,000 between the two programs.

PF88

Adrienne Graham
July 5, 2016

PF88-1 The comment offers the applicant's response to comments regarding the extent of traffic congestion on SR 267. The comment refers to the attached memorandum prepared by LSC Transportation Consultants, Inc. that documents the existing plans and current funding strategies for roadway widening improvements along SR 267.

PF88-2 The comment refers to the attached memorandum, which provides a comparison of traffic increases projected for the MVCP to actual increases based on Caltrans traffic count data. The memo concludes that current traffic volumes at SR 267 and the Placer County/Town of Truckee line are lower than those projected under the MVCP. The comment notes that the proposed MVWPSP would contribute to lower growth by removing 600 potential units from the total anticipated in the MVCP. See also response to comment PF29-21, which explains that the external trips estimated for the MVWPSP are about 50 percent higher than what would be generated following the trip rates from local count data; therefore, the trip rates used in the EIR are higher than actual rates of nearby subdivisions.

PF88-3 This memorandum prepared by LSC Transportation Consultants, Inc. documents the existing plans and current funding strategies for roadway widening improvements along SR 267. The comment is acknowledged.

mountain area preservation
ESTABLISHED IN 1987

PF89

July 5, 2016

Paul Thompson, Interim Agency Director
and Placer County Planning Commissioners
c/o Planning Services Division
3091 County Center Drive
Auburn, CA 95603

Re: Martis Valley West is not a product of the Martis Valley Opportunity

Dear Mr. Thompson and Planning Commission Members,

On June 9, 2016 Placer County hosted the Martis Valley West Parcel (MVWP) Planning Commission hearing for the Specific Plan and EIR. At the hearing Stacy Wydra, Senior Planner for Placer County and lead Planner for the MVWP application made the statement that, ***MVWP project is a product of the Martis Valley Opportunity Agreement (MVOA),*** this is not factually correct. Mountain Area Preservation (MAP) would like to take the opportunity to clear the record and share the facts with the commission members that MVWP is NOT a product of the MVOA. PF89-1

In 2013 MAP, Sierra Watch, Truckee Donner Land Trust and Trust for Public Land reached an agreement with Sierra Pacific Industries (SPI) and Mountain Side Partners (then East West Partners) to preserve the last large parcel of land in Martis Valley for conservation, while transferring land use designations from the East parcel to the West parcel, noted as the MVOA. The agreement outlined a process for initial approvals, which focused on a Placer County-Martis Valley Community Plan (MVCP) process to allow for approval of amendments to the General Plan, MVCP, Placer County Zoning Code and concurrent adoption of a Specific Plan to allow for up to 760 residential units/6.6 acres of commercial development and withdrawal of TPZ for the West Parcel to allow for residential development. The MVOA also outlined a condition for ***Ongoing Cooperation*** which stated that the project applicants would cooperate in a good faith effort to discuss the project application with MAP and Sierra Watch, since the applicants would seek their support in initial approvals with Placer County. This was a very important component of the agreement for MAP, giving us a seat at the table to

negotiate and guide environmentally sensitive development for the West parcel, while preserving over 6,000 acres on the East parcel, creating 50,000 acres of contiguous open space from the floor of Martis Valley to Mount Rose Wilderness.

Unfortunately ***Ongoing Cooperation*** with the conservation partners did not occur in the public process. The MVOA was signed in late 2013 and then in early 2014 the applicants submitted two applications; a Placer County Specific Plan and TRPA Area Plan, counter to the initial approvals process we agreed upon in the MVOA. MAP and many other environmental advocacy groups spent most 2014 requesting the applicants withdraw their TRPA Area Plan for the basin as it was inconsistent with our agreement. Our group was aware that SPI owned roughly 150 acres of land within the Tahoe Basin, but as outlined in the MVOA initial approvals were only sought under the Placer County MVCP, not under the jurisdiction of TRPA. By the end of 2014 SPI and Mountainside Partners, suspended their TRPA Area Plan only then to submit another application to TRPA in July of 2015 for the 550 site Brockway Campground. This was once again very disingenuous to what our groups agreed to in the MVOA. The applicants have chopped their land holdings now into two separate projects, pretending as if one does not affect another, although they are adjacent to each other, this represents classic piecemeal planning. It also illustrates the applicant is seeking deeper entitlements than conceived in the MVOA (760 units, 6.6 acres of commercial, a 550 sites campground at the top of Brockway summit). The applicants are seeking 1310 potential units, this demonstrates there is no net reduction from the MVCP as the applicant and county continue to broadcast. PF89-1 cont.

The MVWP Specific Plan is not a collaborative effort, the plan represents entitlements that the developers seek, not a joint conservation/development deal as the applicants continue to tout to you the decision makers. We pride ourselves as being a credible organization, supporting good land use planning and environmental protection efforts. As land use advocates we would never support a blue print to allow for 75ft condos on a scenic ridgeline visible to Martis and Tahoe, detrimental traffic/circulation conditions, nor environmental impacts that jeopardize the regions public safety. The project applicants have continued to flaunt collaboration with the conservation groups, which is far from the truth.

MAP continues to support the conservation of the East parcel, which is what led us to sign the MVOA in 2013. We appreciate SPI's willingness to offer up the property as conservation, but not at the price of creating lasting and detrimental impacts to the region. We also want to reinstate that there is no assurance that East parcel be fully protected as open space in perpetuity. If the land trust partners are unable to pay for the East parcel in 3 years after initial approvals the land will have a Limited Conservation Easement (LCE) placed on it, not allowing for residential/commercial development which is good, yet it will still be maintained

and owned by SPI for timber management purposes. How this can be justified as a community benefit, making a statement of overriding consideration, when there is no assurance it will truly be preserved open space? The applicants could get their entitlements for development of the West parcel, SPI could be paid a high price for the East side or continue reaping the benefits if the land trust partners can not pay for it. There is no assurance of true preservation or mitigation, and the community is left with significant and unavoidable impacts to our roadways, night sky, air quality and iconic clarity Lake Tahoe.

PF89-1 cont.

While the MVOA is a private agreement amongst the applicants and conservation partners, it is important to understand the history and intent. The MVWP application is NOT a product of the MVOA. We respectfully request you deny the project as proposed, require additional CEQA analysis as the Final EIR is inadequate and request meaningful mitigation to address the concerns we have noted in our Draft EIR letter, Final EIR letter and public testimony.

Sincerely,

Alexis Ollar
MAP Executive Director

PF89

Alexis Ollar
MAP Executive Director
July 5, 2016

PF89-1 The comment states that the MVWPSP is not a product of the MVOA and describes the history and intent of the MVOA. The comment expresses support for the conservation component of the MVWPSP, but expresses opposition to the project as it is currently proposed. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration. In response to the assertion that additional CEQA review is necessary, please see Final EIR Master Response 1. Please also see responses to comment letters PF 29, PF60, and PF65.

PF90

June 29, 2016

RECEIVED
BOARD OF SUPERVISORS
5BOS ✓ TI ✓ ALL AIDES ✓ (mail person)
JUL - 5 2016
SUP ____ COB Corr ✓ CoCo ____
AIDE ____ CEO ____ Other ____

Supervisor Jennifer Montgomery
Supervisor Jack Duran
Supervisor Robert M. Weygandt
Supervisor Jim Holmes
Supervisor Kurt Uhler
Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

Dear Supervisors Montgomery, Duran, Weygandt, Holmes, and Uhler,

Lake Tahoe is a special place to behold, treasure and protect. The Tahoe Basin is home to rich national forest lands, an abundance of wildlife, and of course world-famous clear water. In order to preserve these precious features for both residents and visitors alike, now and in the future, we need to tread lightly, which is why I am deeply alarmed by the proposed Martis Valley West project to develop a mile of forested ridge line inside the Tahoe Basin. The proposed development site sits on an extensive stretch of scenic viewshed, which not only sets a dangerous precedent, but will also cause irreparable damage to land currently zoned forest/conservation, displace many species of wildlife, and contribute significantly to water, air, noise, and light pollution in an environmentally fragile area. PF90-1

The public has entrusted Placer County and the TRPA with protecting and preserving Tahoe's irreplaceable natural beauty and mountain environment. Please do not waste taxpayers' time and money on staff review of this proposal, which would allow the wholesale destruction of a forested ridgeline and further contribute to environmental degradation in the Tahoe Basin.

This proposed project has brought to light the fact that our Tahoe ridge lines have no protections under current laws. I urge you to establish enforceable ridge line protections immediately.

Sincerely,

Carolyn J. Smith

Carolyn J. Smith
262 Deer Court
Incline Village, NV 89451

PF90

Carolyn J. Smith
July 5, 2016

PF90-1 The comment expresses opposition to the project, citing concerns related to air quality, water quality, biological resources, views and night skies, traffic, emergency evacuation, and environmental consequences to the Lake Tahoe Basin. These issues are evaluated in the EIR. It should be noted that, as described in Section 1.5.3 of Chapter 1, "Introduction," of the Draft EIR, the MVWPSP does not propose any changes to lands within the Lake Tahoe Basin that fall under the jurisdiction of TRPA. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

The comment suggests that Placer County should adopt an enforceable ridgeline policy. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the project and ridgeline protections into consideration.

Kathi Heckert

PF91

From: Ellie <tahoellie@yahoo.com>
Sent: Tuesday, July 05, 2016 8:46 PM
To: Kathi Heckert; Shirlee Herrington
Cc: Jennifer Montgomery
Subject: Development & The Potential For Disaster

Please forward this information to the Placer Planning Commissioners for review before the July 7, 2016 Martis Valley West Parcel Specific Plan continuation hearing.

For the Record, Ellie Waller, Tahoe Vista Resident July 5, 2016

PF91-1

New post on **UnofficialAlpine.com**

Development & The Potential For Disaster
by Mark

PF91-1 cont.

Fortunately a tanker from Grass valley was able to get on the scene of a fire near Squaw Valley very q

As the fire season in California comes to life, we get used to seeing daily images on the news media about the latest fire and the l
Today, a small fire broke out along Highway 89 north of Squaw Valley in heavy timber. Fortunately, a complete cadre of local a
one acre. They were also lucky to have resources from the Grass Valley air attack base already in the air fighting the nearby Trai

We were lucky today. The winds were blowing. Tahoe roads were pretty full with tourists during one of the busiest holiday week
control, we could have experienced something like was seen recently in Fort MacMurray, Alberta.

A recent letter in the Sierra Sun highlighted these concerns.

> *Lake Tahoe, Truckee and Martis Valley are being used as a cash cow for Placer County at the life-threatening expense of r*

One day, a wind-blown wild fire will surely enter the Tahoe Basin. Where will you go ... how does anyone fleeing for their Shore and it's only two escape routes are gridlocked?

I have been in the midst of a 100,000-acre, wind-blown wildfire. Here's a reality of emergency evacuations from wind-blo People panic, and wind-blown wildfires aren't predictable. PF91-1 cont.

I spent the better part of three days and nights moving horses during this fire. One minute the fire line could be a mile awa windblown embers landing all around me while embers were blowing past me faster than I could run or drive.

The ground got so hot I couldn't stand still and every time I tried to inhale I wasn't sure my lungs wouldn't explode from t

Now, envision a windblown wildfire of that, or greater magnitude on the North Shore of Lake Tahoe with only two, single-l west and Hwy 267 to the east, both single-lane, canyon roads surrounded on both sides by drought-stricken, explosive pine

Various government agencies such as TRPA, Washoe County, Placer County and the town of Truckee are currently in proc a number of new developments in our region, including: Village at Squaw Valley, Homewood, Boulder Bay, Highlands II a Campground and Martis Valley West.

Mountainside Partners (formerly East West Partners, notably bankrupt at the Ritz, Old Greenwood and Grey's Crossing a fast-tracking, a proposed 760-unit gated development adjoining their also-proposed 550-space campground.

Both of these proposed developments — the 550-space Brockway Campground and the adjoining 760-unit gated Martis Va Hwy 267 from the ridgeline, including into the Tahoe Basin for the campground project.

Martis Valley West developers claim their emergency evacuation model shows an orchestrated emergency evacuation time

There is simply nothing orderly about a wind-blown wildfire. Let us consider reality — thousands of fleeing residents and v trees from all around the North Shore, including the communities east of Tahoe City, like Dollar Hill, Dollar Point, Cedar Beach, perhaps even residents and visitors from Crystal Bay or Incline Village, rushing toward Hwy 267.

Now add hundreds of out-of-area campers staying at the Brockway Campground with their RVs, trailers and boats. All it w accident, a stalled RV, a jack-knifed boat and everything will come to a life-threatening onslaught of stalled humanity bein

Hwy 267 will be a death zone. This is North Shore Emergency Evacuation reality ... and this is the very reality Placer Cou sense, safety and wellbeing be damned!

Most notably missing from various public forums are any representatives from the Northstar Fire Department.. North Tah How can his be?

The developers are seeking a 20-year building permit for Martis Valley West. They plan to log more than 20,000 trees and absolutely decimating natural wildlife corridors.

These developments, Martis West and Brockway Campground, are insanity. The irreversible threat to the environment, the

threat to public safety and the threat to Lake Tahoe itself from the added carbon emissions from gridlocked traffic should s planners and TRPA toward common sense realities and to stop them from approving of these two insane, destructive and d and Truckee areas are already at capacity overload.

Stand up on July 7 at 2 p.m. at the North Tahoe Event Center in Kings Beach at the Placer County Planning Commission m people and deny Martis Valley West. PF91-1 cont.

Robert Heinz is a Tahoe City resident and has lived here since 1997.

As Mr. Heinz suggests, it's important that we take a stand and let Placer County know that enough is enough. Combine all of the Alpine Meadows and Squaw Valley - and you will be bringing far more people than ever into the Tahoe basin during fire season.

The Placer County Planning Commission is expected to vote on the Martis West Plan at their meeting on July 7th at 2 pm at the Commission was also expected to address the Village at Squaw Valley project by July, but no date has been set for that meeting people showing up at recent development meetings - we can't let our guard down.

The future in Lake Tahoe? The Fort McMurray evacuation in Alberta this summer has many people thinkin

Mark | July 5, 2016 at 7:22 pm | Tags: Kings Beach, Lake Tahoe, Martis Valley West, Squaw Valley | Categories: Editoria

PF91-1 cont.

Comment See all comments

Unsubscribe to no longer receive posts from UnofficialAlpine.com.

Change your email settings at Manage Subscriptions.

Trouble clicking? Copy and paste this URL into your browser:

http://unofficialalpine.com/?p=11230

PF91

Ellie Waller
July 5, 2016

PF91-1 The comment provides a reproduction of an article from UnofficialAlpine.com. The article addresses wildfire risk and emergency evacuation. The comment does not directly address the EIR or the environmental analysis.

Kathi Heckert

PF92

From: Shirlee Herrington
Sent: Wednesday, July 06, 2016 10:06 AM
To: Kathi Heckert
Cc: EJ Ivaldi; Paul Thompson; Karin Schwab; Stacy Wydra
Subject: Correspondence: Martis Valley West

FYI

Thank you,
Shirlee

Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
530-745-3132
sherring@placer.ca.gov

COUNTY OF Placer
COMMUNITY DEVELOPMENT RESOURCE AGENCY

From: Michael Gorman [mailto:michaelgorman1947@gmail.com]
Sent: Wednesday, July 06, 2016 6:55 AM
To: Shirlee Herrington
Subject: Martis Valley West

Please register my disapproval for the Martis Valley West development proposal. This initial venture and the others which will inevitably follow will change the environment of Tahoe's North Shore forever. PF92-1

Thank You

Michael Gorman
Full time resident since '78

PF92 Michael Gorman July 6, 2016

PF92-1 The comment expresses disapproval of the project. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

From:	Shirlee Herrington on behalf of Placer County Environmental Coordination Services
Sent:	Wednesday, July 06, 2016 1:19 PM
To:	Kathi Heckert
Cc:	Paul Thompson; EJ Ivaldi; Stacy Wydra; Karin Schwab
Subject:	Comments on Martis Valley West project

PF93

FYI

Thank you,
Shirlee

Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
530-745-3132
sherring@placer.ca.gov

COUNTY OF Placer
COMMUNITY DEVELOPMENT RESOURCE AGENCY

From: Adrian Juncosa [mailto:lvbwamgv@gmail.com]
Sent: Wednesday, July 06, 2016 12:30 PM
To: Placer County Environmental Coordination Services
Cc: mkrach@placer.ca.gov; Stacy Wydra
Subject: Subject: Comments on Martis Valley West project

Dear Planning Staff,
I am uncertain which address is the best to send this comment to, I apologize to anyone who shouldn't have been the recipient.

Although it is late in the process, I have been urged by several individuals to comment on specific technical issues in the Final EIR for the Martis Valley West project, based upon my extensive experience with biological studies and impact analyses including 25 years of field work specifically in the northern Sierra Nevada (Tahoe-Truckee) region. PF93-1

Written comments that were previously submitted on the Martis Valley West Draft EIR and Final EIR point out that the latter continues to be inadequate in addressing potential impacts on biological resources. I provide here some additional specific respects in which it does not achieve the usual standard of thoroughness one would expect from Ascent Environmental.

The Draft EIR states that a floristic botanical survey was performed and that the project has no potential impacts on special status plant species. These statements are both incorrect and are not remedied in the Final EIR. The documentation required by the CDFW plant survey protocols is not provided in the DEIR or FEIR and the minimal information that is provided in the DEIR shows that there is indeed a potential significant impact on a locally very rare plant species. The plant list provided in the DEIR (in Appendix G), which overall appears modest for a site of this size and ecological diversity, states that *Eriogonum umbellatum* was found, but

provides no further discussion or identification. One of the rarest plants in the vicinity of the project is *E. umbellatum* var. *torreyanum*, which is assigned Rare Plant Rank 1 by CDFW and grows on soils derived from volcanic rocks (such as, for one possible example, Rubble Land which is a major component in at least one soil map unit within the site). The plant survey therefore fails the requirement to identify plant species to the taxonomic level necessary to ascertain whether a taxon that could be considered rare, threatened, or endangered under CEQA Guideline 15380 is present. The correct determination is that a potentially significant impact on at least one special status plant species might result from the project. The plant list is also rife with spelling and taxonomic errors and many plants identified only to genus, raising doubt about its completeness and accuracy. PF93-1 cont.

Comments on the EIR have identified shortcomings in the discussion of potential impacts on mule deer. Specifically, the analysis of potential impacts on deer migration and possible use of the site for fawning is inadequate. Reliance on the CDFW tracking studies is not a sufficient basis to conclude that the site is not used substantially for these purposes. The studies that were cited were relatively limited and based upon a small number of animals out of a large herd using a wide geographic area. Deer use of an overall herd range is much more granular than the DEIR or FEIR recognizes. This fact is abundantly documented in the voluminous scientific literature on mule deer migration, virtually none of which was considered by the DEIR or FEIR. Briefly, the tracking results one obtains are substantially affected by the individual animals that are captured for tracking. Unless the tracked population is much larger than the one studied by CDFW (for very different purposes than evaluation of impacts of the Martis project), the results are tentative and incomplete when applied to a distant part of the overall herd range. Even with the currently available GPS and radio tracking technology, CDFW staff and other deer scientists still perform extensive pellet surveys to further elucidate deer migration behavior, especially when the available financial resources for radio/GPS tracking are constrained so that an inadequate sample size can be trapped and collared. There are easily feasible, inexpensive means of acquiring detailed site-specific spatial information on deer migratory use that are routinely applied in recent environmental impact studies in the Sierra Nevada (and probably elsewhere). These should have been applied to the Martis Valley West DEIR and FEIR. PF93-2

The land cover map in the DEIR shows habitat types that are potentially highly suitable for use as fawning use by mule deer ("nursery" use in CEQA terminology), depending upon the details of cover and height of the lower vegetation strata, but the DEIR includes neither the relevant additional details of habitat characteristics or an easily feasible site study of the spatial distribution of deer sign, either of which would provide important information about this potential use of the site. It is simply inadequate to conclude without any site-specific study at all that there is no potential nursery use. Reliance upon the scanty documentation of critical fawning areas from the 1980s is not adequate in the context of the abundant scientific literature on the specific vegetation characteristics of suitable fawning habitat. PF93-3

I hope that these specific comments can still be considered in the Planning Commission's deliberations on the FEIR.

Adrian Juncosa
16173 Lancaster Place
Truckee, CA 96161

PF93-1 The comment claims that "the Draft EIR states that a floristic botanical survey was performed and that the project has no potential impacts on special status plant species." This is incorrect. The analysis of impacts to special-status plants presented in the Draft EIR (Impact 7-3) concludes that the project could result in potential impacts on special-status plants and proposes mitigation for such impacts (Mitigation Measure 7-3). The Draft EIR further states that although reconnaissance-level surveys and habitat assessments were completed, no protocol-level surveys for special-status have been conducted to conclude the absence of any special-status species; and, because suitable habitat is present for some special-status plant species, project implementation could affect special-status species that may be present. Page 7-49 of the Draft EIR includes the following:

> "No protocol-level surveys for special-status plant species have been conducted to confirm the presence or absence of special-status species on the project site. Therefore, project implementation could affect special-status species, if they are present.
>
> Construction of project facilities on the West Parcel and within the offsite utilities corridors could result in loss of special-status plants if they are present. In addition to direct removal of individuals and habitat during vegetation removal, grading for drainage, or other construction-related disturbances, plants could suffer other direct physical damage, including breaking, crushing, and burying. Damaged plants may experience altered growth and development, or reduced or eliminated seed-set and reproduction, and mortality of individuals or populations can eventually result. Loss of special-status plants would be a potentially significant impact."

Additionally, Mitigation Measure 7-3 (Avoid, minimize, and compensate for effects on special-status plants) is proposed in the Draft EIR to reduce potential impacts to less-than-significant levels. Mitigation Measure 7-3 requires protocol-level surveys for special-status plants prior to construction, and implementation of avoidance, minimization, and/or compensation measures, as applicable.

PF93-2 The comment states that comments by other individuals on the Draft EIR have identified shortcomings in the discussion of potential impacts on mule deer, and asserts that the analysis of potential impacts on deer migration and possible use of the site for fawning is inadequate.

As described in response to comment IO26-23 in the Final EIR, the Draft EIR presents relevant and current information on known mule deer habitat use and movements relative to the project area, based on recent studies conducted by the California Department of Fish and Wildlife (CDFW) and input from a CDFW biologist leading the studies, and analyzes potential effects of the proposed MVWPSP on mule deer based largely on that available information. It is understood that recent studies to identify major movement routes or patterns of habitat use, based on tracking data, do not necessarily address finer-scale movements by individual deer or identify all areas used by deer; and, this is reflected in the full discussion of mule deer in the Draft EIR. The Draft EIR describes that mule deer do occur on the West Parcel and may be affected by project implementation:

> "Mule deer were detected on the West Parcel and East Parcel. Construction-related activities on the West Parcel could cause mule deer to avoid or move out of the areas immediately surrounding work areas. This could result in temporary impacts to

foraging, movement, fawning, or sheltering behavior. Direct mortality or injury to deer could also occur as a result of vehicle or equipment collisions." (Pages 7-55 to 7-56)

As required for the Draft EIR, potential impacts on biological resources were evaluated based specifically on the significance criteria described on pages 7-39 to 7-40. Regarding effects on mule deer and animal movement corridors, for purposes of the Draft EIR, an adverse effect alone does not necessarily constitute a significant impact; significance and the need to mitigate are based on the magnitude and intensity of the effect relative to existing conditions and were evaluated based specifically on the established significance criteria.

PF93-3 The comment suggests that the land cover map provided in the Draft EIR shows habitat types that are potentially highly suitable for use as fawning habitat by mule deer, depending on specific vegetation characteristics (e.g., structure), but the Draft EIR does not include relevant details of habitat characteristics or other information about the potential for deer fawning on the project site. The comment also states that it is inadequate to conclude that there is no potential for deer fawning/nursery use on the project site.

The comment does not specify whether its opinion about the suitability of potential fawning habitat applies to the West Parcel, East Parcel, or both parcels; it also does not describe which habitats shown on the land cover map are "potentially highly suitable" for fawning. The following excerpts from the Draft EIR describe and provide rationale for the suitability of potential fawning habitat determined for both the West Parcel and East Parcel:

> "Suitable fawning areas are located in the East Parcel in wetland and riparian habitat; however, the West Parcel does not contain areas expected to support deer fawning." (Page 7-55)
>
> "…Deer are not expected to use the West Parcel for fawning because of the limited availability of undisturbed riparian or other shrub habitats near open water in the parcel. Important habitat requirements for mule deer fawning include undisturbed meadow and riparian areas that provide hiding cover and forage. The only riparian habitat on the West Parcel occurs along SR 267 and is highly disturbed by highway traffic and maintenance." (Page 7-55)
>
> "… the East Parcel contains 149.2 acres of riparian/wetland/meadow complexes and associated streams that could provide fawning habitat … (Page 7-56).

The Draft EIR does not conclude that there is no potential for deer fawning in the project site; it states that the potential on the West Parcel is considered low for the reasons described above.

Kathi Heckert

PF94

From: Shirlee Herrington
Sent: Wednesday, July 06, 2016 2:43 PM
To: Kathi Heckert
Cc: Stacy Wydra; EJ Ivaldi; Paul Thompson
Subject: Martis Valley West Project

FYI

Thank you,
Shirlee

Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
530-745-3132
sherring@placer.ca.gov

-----Original Message-----
From: Mark McLaughlin [mailto:mark@thestormking.com]
Sent: Wednesday, July 06, 2016 1:41 PM
To: Shirlee Herrington
Subject: Martis Valley West Project

To Whom it May Concern:

As a 38-year, full-time resident of North Lake Tahoe, I would like to register my concerns about the proposed Martis West project. PF94-1

I am 100% against this development and don't want to see it approved.

Thank you for your consideration.

Mark

Mark McLaughlin
OFFICE: 530-546-5612
CELL: 916-214-4829

PF94 Mark McLaughlin July 6, 2016

PF94-1 The comment expresses concern about the project and opposition to it. Comments regarding preferences for the project will be included in information forwarded to the Placer County Board of Supervisors for its consideration.

Kathi Heckert

PF95

From: Jennifer Quashnick <jqtahoe@sbcglobal.net>
Sent: Wednesday, July 06, 2016 9:00 AM
To: Kathi Heckert; Shirlee Herrington
Cc: Stacy Wydra; Paul Thompson; Michele Kingsbury; EJ Ivaldi
Subject: Concerns regarding Economic Viability of MVWPSP alternatives

Hello Ms. Heckert,

Can you please provide these comments to the Planning Commissioners for tomorrow's hearing? Thank you for your assistance.

Dear Members of the Planning Commission,

You have been provided with information that two less impactful MVWPSP alternatives (Alternatives 3 and 5) are economically infeasible. The Economic Viability Report upon which this conclusion is based was provided to you and the public just days before the last Planning Commission hearing. Little time was available to review the report, let alone to ask and receive answers to questions on it. It has been roughly a month since this information was made available to the public, and still no answers have been provided to several basic questions, including the projected total project revenue - which is central to assessing the return on investment discussed in the report. While the County's current effort to peer review the Economic Report is appreciated (see below), clearly the results of the peer review have not been (and appear unlikely to be) made available to you or the public with ample time to consider them *prior to* being asked to make a recommendation on this project tomorrow. PF95-1

Given the 20-year time frame of the decision you are being asked to make, it is imperative that it be based upon the best available information. As economic feasibility is a key component of the information you will have to consider in order to make a substantial decision that will forever alter the North Tahoe/Truckee Region, information suggesting that Alternatives 3 and 5 are not feasible should be heavily reviewed and scrutinized well in advance of your hearing. **To have this peer review completed *after* you have been asked to make a recommendation on this project makes little sense.**

As previous public comments have stated, many questions about this project remain. In addition, the proposed project will result in numerous significant and unavoidable impacts yet the EIR fails to consider all feasible mitigation measures. Please deny this project unless and until sufficient information has been provided and all available mitigation has been PF95-2

incorporated to reduce the project's impacts.

PF95-2 cont.

Thank you for your consideration,

~Jennifer Quashnick
for Friends of the West Shore

----- Forwarded Message -----
From: Jennifer Quashnick <jqtahoe@sbcglobal.net>
To: Michele Kingsbury <MKingsbu@placer.ca.gov>; Stacy Wydra <SWydra@placer.ca.gov>
Cc: Kathi Heckert <KHeckert@placer.ca.gov>; EJ Ivaldi <EJIvaldi@placer.ca.gov>; Paul Thompson <PKThomps@placer.ca.gov>
Sent: Tuesday, July 5, 2016 8:36 PM
Subject: Re: QUESTIONS -- Re: Economic Report?

PF95-3

Thank you for the response, Michele.
However, it is of concern that this peer review will apparently not be completed, and/or provided to the Planning Commission and public, prior to Thursday's hearing(?) This should be done *before* the Planning Commission is asked to provide a recommendation on the project as alternatives that might otherwise be considered are currently dismissed as economically infeasible. When will the peer review be completed? Has the developer provided the County with any revenue projections in the meantime?

Thank you,
~Jennifer

From: Michele Kingsbury <MKingsbu@placer.ca.gov>
To: "jqtahoe@sbcglobal.net" <jqtahoe@sbcglobal.net>; Stacy Wydra <SWydra@placer.ca.gov>
Cc: Kathi Heckert <KHeckert@placer.ca.gov>; EJ Ivaldi <EJIvaldi@placer.ca.gov>; Paul Thompson <PKThomps@placer.ca.gov>
Sent: Tuesday, July 5, 2016 8:03 AM
Subject: FW: QUESTIONS -- Re: Economic Report?

Jennifer: To get back to you. Stacy provided the Economic Viability Report prepared by the developer to you on June 7th. The County has requested that the report be peer reviewed and that review is currently in process.

If you should need anything else, please let us know.

Michele Kingsbury

Principal Management Analyst
(530) 886-4614
mkingsbu@placer.ca.gov

From: Jennifer Quashnick [mailto:jqtahoe@sbcglobal.net]
Sent: Monday, July 04, 2016 6:36 PM
To: Stacy Wydra
Cc: Kathi Heckert; Michele Kingsbury; Paul Thompson; EJ Ivaldi; Kelly Berger
Subject: Re: QUESTIONS -- Re: Economic Report?

PF95-3 cont.

Hello Stacy,

I still haven't received a response to this question. I have not been able to review all of the 7/7 attachments yet, however I also not find any discussion of this issue in the 6/30 staff report. Can you please address?

Thank you,
~Jennifer

From: Jennifer Quashnick <jqtahoe@sbcglobal.net>
To: Stacy Wydra <SWydra@placer.ca.gov>
Cc: Kathi Heckert <KHeckert@placer.ca.gov>; Michele Kingsbury <MKingsbu@placer.ca.gov>; Paul Thompson <PKThomps@placer.ca.gov>; EJ Ivaldi <EJIvaldi@placer.ca.gov>; Kelly Berger <KBerger@placer.ca.gov>
Sent: Tuesday, June 14, 2016 9:49 AM
Subject: Re: QUESTIONS -- Re: Economic Report?

Hi Stacy,

I know you are probably addressing many questions from the public right now, however I wanted to check in as I haven't heard back on this one yet.

Thanks,
~Jennifer

From: Jennifer Quashnick <jqtahoe@sbcglobal.net>
To: Stacy Wydra <SWydra@placer.ca.gov>
Cc: Kathi Heckert <KHeckert@placer.ca.gov>; Michele Kingsbury <MKingsbu@placer.ca.gov>; Paul Thompson <PKThomps@placer.ca.gov>; EJ Ivaldi <EJIvaldi@placer.ca.gov>; Kelly Berger <KBerger@placer.ca.gov>
Sent: Wednesday, June 8, 2016 11:28 AM
Subject: QUESTIONS -- Re: Economic Report?

Hi Stacy,

My apologies if I missed this, but the Economic report discusses the ROI and Common Costs per unit/etc., however I don't see any information regarding the anticipated price of the units that will be

sold - which I would expect to be central to assessing the ROI. For example, on p. 10 the report discusses the Common Cost per unit associated with Alternatives 3 and 5, however there is no discussion of the per unit anticipated sales price.

E.g., p. 10 states: "For example, the net margin for an average developed unit , after absorbing an additional $70,000 per unit Common Cost as compared to the MVWP, is diminished from 10% to approximately 3%."

PF95-3 cont.

If a change in per unit Common Cost of $70,000 is equivalent to a 7% reduction, then this suggests that each lost is assumed to sell for approx. $1 million - is this correct (I realize this is too simplistic a view, but just speaking in rough terms)? In reviewing lots available in other similar communities (as referenced in the DEIR, such as Martis Camp and Northstar), lots for sale appear to run up to $2.5 million and higher. How can the report draw conclusions about cost per unit without discussing the anticipated sales price per unit? In addition, market forces suggest that if there are fewer units for sale, the price of each unit is apt to be higher, also affecting the ROI. I don't see that this was considered in the report.

If I have missed this information, can you please direct me to it? I also do not see that Placer County reviewed and assessed the information in the economic report?

Thank you,
~Jennifer

From: Stacy Wydra <SWydra@placer.ca.gov>
To: "Jennifer Quashnick (jqtahoe@sbcglobal.net)" <jqtahoe@sbcglobal.net>
Cc: Kathi Heckert <KHeckert@placer.ca.gov>; Michele Kingsbury <MKingsbu@placer.ca.gov>; Paul Thompson <PKThomps@placer.ca.gov>; EJ Ivaldi <EJIvaldi@placer.ca.gov>; Kelly Berger <KBerger@placer.ca.gov>
Sent: Tuesday, June 7, 2016 5:39 PM
Subject: FW: Economic Report? Re: 6-9-16 PC Agenda - Tahoe location - Martis Valley West Specific Plan staff report available

Hi Jennifer –
Please find the Economic Viability Analysis (EVA) attached per your request. In addition the EVA will be posted to the MVWPSP page on the County's website sometime tomorrow.
Thank you –
Stacy

Stacy Wydra
****
Stacy Wydra
Senior Planner
County of Placer
CDRA | Planning Services Division | Tahoe
775 North Lake Boulevard

P.O. Box 1909
Tahoe City, CA 96145
(530) 581-6288 - direct

Please consider the environment before printing this e-mail.

PF95-3 cont.

From: Jennifer Quashnick [mailto:jqtahoe@sbcglobal.net]
Sent: Friday, June 03, 2016 9:19 PM
To: Kathi Heckert; Stacy Wydra
Subject: Economic Report? Re: 6-9-16 PC Agenda - Tahoe location - Martis Valley West Specific Plan staff report available

Hello,
I can not locate the "Martis Valley West Parcel Specific Plan Economic Viability Analysis (May 2016)" that is referred to as evidence for rejecting Alternatives 3 and 5 (see Attachment H). Please provide this as soon as possible.
Thank you,
~Jennifer

From: Kathi Heckert <KHeckert@placer.ca.gov>
To: Kathi Heckert <KHeckert@placer.ca.gov>
Sent: Friday, June 3, 2016 9:16 AM
Subject: 6-9-16 PC Agenda - Tahoe location - Martis Valley West Specific Plan staff report available

Hello Interested Parties -

Please find agenda attached.

Click on link below to view staff report.

http://www.placer.ca.gov/departments/communitydevelopment/planning/pchearings

Thank you.

Kathi Heckert, Senior Board /Commission Clerk
Placer County CDRA
3091 County Center Drive
Auburn CA 95603
(530) 745-3082

PF95

Jennifer Quashnick
July 6, 2016

PF95-1 The comment addresses the Economic Viability Report prepared for the project and recommends scrutiny of information upon which it is concluded that Alternatives 3 and 5 are not feasible. The comment addresses attachments to the staff report and do not directly address the environmental analysis.

PF95-2 The comment suggests that the EIR fails to consider all feasible mitigation measures for significant and unavoidable impacts, but does not offer specific information as to what impacts are referenced and what additional mitigation is suggested. See responses to comments IO18-4 and IO18-75 regarding mitigation measures. The State CEQA Guidelines provide direction on mitigation measures (CCR Section 15126.4) stating that "An EIR shall describe feasible measures which could minimize significant adverse impacts…", and clarifying that "[m]itigation measures are not required for effects which are not found to be significant." The Draft EIR provides all feasible mitigation measures necessary to reduce significant impacts to less-than-significant levels. Where impacts remain significant after imposing all feasible mitigation, the impacts are identified as significant and unavoidable in the Draft EIR.

PF95-3 The comment reproduces correspondence regarding the Economic Viability Report. See responses to comments PF18-1 and PF95-1.

Legal Services of NORTHERN CALIFORNIA

PF96

July 6, 2016

County of Placer Planning Commission
3091 County Center Drive
Auburn, Ca. 95603

Re: Planning Commission Special Hearing of July 7, 2016
Martis Valley West Parcel Specific Plan

Honorable Members of the Placer County Planning Commission:

Thank you for this opportunity to comment on the Martis Valley West Parcel Specific Plan (MVWPSP). I will be unable to appear at the Commission meeting on July 7, 2016, and I request that these comments be presented to the Commission and included in the record.

On behalf of Legal Services of Northern California and the low income residents that we represent, I wish to comment on the proposed certification of the Martis Valley West Parcel Specific Plan Final Environmental Impact Report. Specifically, I request that Impact 6-3: Provision of employee housing, be changed to Significant and that mitigation measures be identified which would reduce the impacts to less than significant. PF96-1

In the Table of Impacts, Impact 6-3: Provision of employee housing, identifies that between 66.58 and 122.68 new full-time equivalent employees will be generated by the project. The report states that the Placer County General Plan requires that the project "must provide housing or an in-lieu fee to support housing for half of the FTE....MVWPSP Policies LU-HS1 through LU-HS5 require the project to comply with this requirement, which is anticipated to be met by providing for workforce housing."

The report recommends that this impact be designated as "Less than Significant" and that "No mitigation is required." However, there can be no question that this project, without mitigation measures, will create a significant environmental impact. The plan does not specify how this impact will be mitigated to a less than significant level. The project will create a need for a significant number of housing units. The plan states that it "anticipates" that workforce housing will be created, but does not state that this will be required. The plan does not specify what land may be dedicated for housing, or that this is sufficient to guarantee the production of the housing. The plan states that the housing may be produced by an "in lieu fee to support housing", but it

Mother Lode Regional Office
190 Reamer Street, Auburn, CA 95603
Phone: (530) 823-7560 | Fax: (530) 823-7601 | Toll Free: (800) 660-6107
auburn-office@lsnc.net

Satellite Office
101 Providence Mine Road, Suite 106D, Nevada City, CA 95959
Phone: (530) 470-8562 Fax: (530) 470-8670
auburn-office@lsnc.net

www.lsnc.net

A Legal Services Corporation Program LSC

does not state what the amount of the fee would be, or demonstrate that it is sufficient to guarantee that housing could actually be constructed. In addition, Placer County is currently conducting a study to determinate the amount of the in lieu fees which may be assessed in this situation, and the amount of the in lieu fee requirement may change. PF96-1 cont.

For these reasons, we respectfully request that the Commission change the proposed Impact 6-3 to state that a significant impact would be created by this project and require that a specified number of workforce housing units be constructed as a mitigation measure.

Thank you for your consideration.

Legal Services of Northern California

W. H. Whitaker
Managing Attorney

PF96

W.G. Whitaker
Legal Services of Northern California
July 6, 2016

PF96-1 The comment requests that the impact regarding provision of employee housing be revised to significant and that mitigation measures be identified. As discussed on page 6-11 of the Draft EIR, the impact related to the provision of employee housing would be less than significant because the MVWPSP would comply with County requirements for work-force housing. The Draft EIR states that between 66.58 and 122.68 new FTE employees would be generated by the MVWPSP, and that housing for 50 percent of those employees must be provided. The comment does not provide evidence that this analysis is incorrect.

The MVWPSP Development Agreement provides additional detail regarding the provision of employee housing. Two options are provided—either construction of 21 units within the MVWPSP or payment to Placer County of a fee of $2,450,000. In addition, the Development Agreement requires a onetime payment of $125,000 toward regional employee housing initiatives.

MASTER RESPONSE

Project-generated Vehicle Miles Traveled in the Tahoe Basin and its Potential Air and Water Quality Effects

Several comments received on the Martis Valley West Parcel Specific Plan Draft and Final EIR raise questions and concerns about project-generated vehicle use in the Tahoe Basin and its effects on air and water quality. Specific concerns about additional VMT as it relates to TRPA standards, were also raised. As a general note, VMT is not, in and of itself, an environmental issue. It can be related to environmental issues, notably air quality, traffic congestion, and water quality, subject to the following considerations:

> Air Quality/Water Quality: VMT is used to determine overall air emissions from a project. Vehicle miles traveled per trip is used to calculate the vehicular emissions associated with a project. Notably, air emissions per VMT have decreased substantially over time as vehicle emissions standards have been promulgated and implemented. Air quality is typically evaluated based on effects to an air basin (the project site and the Tahoe Basin are located in the Mountain Counties Air Basin).
>
> VMT can further be related to water quality effects associated with wintertime application of abrasives such as sand to the roadway, which can be crushed by tires and washed into the lake by stormwater/ice melt. Water quality is also affected by atmospheric deposition of pollutants emitted by cars, primarily nitrogen and particulates.
>
> Comments on the Final EIR suggest that these effects of VMT on Lake Tahoe clarity should be more thoroughly addressed.
>
> Traffic Congestion: While VMT can provide a gross overview of traffic congestion, other standards such as level of service (LOS) provide a more accurate indication of congestion along specific segments of roadway and at specific intersections. The relationship between VMT and traffic congestion is less clear; obviously, the more the VMT, the greater the likelihood of traffic congestion. However, congestion is also determined by distribution and timing of vehicle travel, roadway width; the presence of signals, stop signs and other controls; and a variety of other factors, all of which are evaluated by LOS. The FEIR used LOS as the measure of the project's contribution to congestion.
>
> None of the comments suggest that VMT provides a better metric for traffic congestion, or why the LOS analysis should not be used. Specific traffic-related comments on the Final EIR are addressed briefly in this discussion and also in response to individual comments. The remainder of this response addresses VMT and water quality.

TAHOE REGIONAL PLANNING AGENCY VMT THRESHOLD

Rationale for TRPA VMT Threshold

TRPA is responsible for achieving and maintaining specific environmental standards known as environmental threshold carrying capacities, or "thresholds." TRPA has developed a system that defines indicators of environmental health within each of nine threshold areas, and threshold standards for each indicator. One of TRPA's air quality indicator categories is visibility, and one of the standards used to measure compliance with visibility objectives is VMT. In other words, TRPA's VMT threshold was adopted as an air quality standard designed to maintain air visibility in the Tahoe Basin.

Despite the original purpose of the VMT threshold, it has come to represent a surrogate for traffic congestion, generally, and for water quality, as described above. Historically, TRPA posited that more VMT

would result in increased traffic congestion, increased nitrate loading into the atmosphere (and subsequent deposition into Lake Tahoe), and an increase in the airborne concentration of particulate matter known to adversely affect regional and sub-regional visibility and human health (TRPA 1982). In 1982, TRPA adopted a threshold standard that requires TRPA to not exceed total VMT in the Basin equivalent to 10 percent below the 1981 base year values, equivalent to 2,067,600 VMT, as indicated by a peak travel day, generally represented by a summer weekend (TRPA 2012). Although the project site is not within the Tahoe Basin and not subject to the environmental standards of TRPA, the project is near the Basin boundary, and project-generated trips would contribute to in-Basin VMT.

LAKE TAHOE TOTAL MAXIMUM DAILY LOAD

Section 303(d) of the Clean Water Act (CWA) requires states to compile a list of impaired water bodies that do not meet water quality standards. CWA also requires states to establish total maximum daily loads (TMDLs) for such waters, focused on the pollutants for which the water body is listed as impaired. For Lake Tahoe, the pollutants determined to be responsible for the decline in deep water transparency are fine sediment, nitrogen, and phosphorus. The Lake Tahoe TMDL is a science-based plan to better understand the causes of the loss in lake clarity, determine how much pollution—specifically, fine sediment, nitrogen, and phosphorus—needs to be reduced to reinstate historic clarity, and develop a workable, cost-effective implementation strategy. Now in the implementation and tracking phase, controls are being implemented to reduce pollutant loading to Lake Tahoe and the Lahontan Regional Water Quality Control Board (Lahontan Water Board) and Nevada Department of Environmental Protection are working closely with those implementing water quality improvement projects to track progress, report accomplishments, measure effectiveness, and adaptively manage implementation efforts.

Research and scientific study conducted in support of the Lake Tahoe TMDL indicates that a 65 percent reduction in fine sediment particles (from the 2008 baseline), accompanied by reductions in nitrogen and phosphorous of 10 percent and 35 percent respectively, are necessary to meet the TMDL numeric target of lake clarity of nearly 100 feet. Approximately half of these load reductions are needed to meet the Clarity Challenge, an interim milestone of 80 feet annual average Secchi disk depth to be realized by 2031. The Clarity Challenge is an important goal because, once attained, scientists can state with confidence that the trend in clarity loss has been reversed and the region is moving toward restoring Lake Tahoe's clarity.

Although the TMDL program includes required reductions for total nitrogen, total phosphorus, and fine sediment particles, initial implementation efforts are focused on particle reduction because fine sediment particles have a greater impact on clarity than the algae fed by elevated nutrient concentrations. Urban stormwater represents both the greatest source of these particles, as well as the greatest opportunity to achieve needed load reductions. So, while the restoration strategy includes efforts to reduce pollutants originating in forests, stream channels, and the atmosphere, attaining the load reduction goals hinges on reducing fine sediment particles originating in urban areas and transported to the lake through stormwater runoff (Lahontan Water Board 2016).

RELATIONSHIP BETWEEN VMT AND LAKE CLARITY

TMDL-related research indicates that improvements to road operations for water quality, including increased maintenance activities, could be the most cost-effective strategy in the near term to achieve notable pollutant load reductions of fine sediment particles (TRPA RPU DEIR: 3.8-30). Consistent with this approach, the *County of Placer Lake Tahoe Pollutant Load Reduction Plan* (Placer County 2013) intends to meet the TMDL requirements (in this permit term) through water quality improvement project catchments, implementing pollutant control measures in road maintenance operations, and quantifying clarity credits from completed private development and redevelopment projects located in registered catchments. The Lahontan Water Board has developed the Lake Clarity Crediting Program to support the Lake Tahoe TMDL. This crediting program specifies the process to connect implementation of water quality improvement actions to corresponding estimated pollutant load reductions. Through this program, “Lake Clarity Credits”

have been defined as a mechanism to provide flexibility for regulated jurisdictions to achieve required load reductions. Lahontan intends to use the Lake Clarity Crediting Program as an accounting system for Lake Clarity Credits to track compliance with stormwater regulatory measures. Although Placer County anticipates that the majority of Lake Clarity Credits will be associated with water quality improvement projects, the County has identified the following control measures to meet sediment load reduction requirements:

- Use of an abrasive supply with negligible fine sediment particles and high hardness content in the source material.
- Improved sediment recovery through an increase in the frequency of road sweeping operations in targeted, registered catchment project areas.
- Purchasing a new, high-efficiency vacuum assist sweeper to improve the overall efficiency of road sweeping operations.

These in-Basin measures by Placer County address in-Basin sediment loading and are being implemented to achieve the required load reductions, to support the objectives of the TMDL, and ultimately, to restore Lake Tahoe's clarity.

The connection between VMT and Lake clarity is important, as vehicle emissions and roadway fines are known contributors to loss of clarity, but a link between a specific number of VMT and attainment of Lake clarity goals is difficult to determine. Although TRPA established the 1982 goal of meeting a VMT target of 2,067,000 (10 percent below 1981 VMT levels), as measured on a peak summer day, the importance of this specific goal in light of other programs, new research and data, and regulatory requirements adopted since 1982 warrants consideration:

- TRPA released a Threshold Evaluation Report in 2011 (TRPA 2011). With regard to VMT, the "Data Evaluation and Interpretation" section of the Air Quality threshold included the following two conclusions (pages 3-49 and 3-50):
  - "Relevance – Vehicle Miles Traveled (VMT) is a proxy measure of traffic congestion, the production of nitrates, and entrainment of soil sediments from roads. Historically, TRPA posited that more VMT would result in increased traffic congestion, increased nitrate loading into the atmosphere (and subsequent deposition into Lake Tahoe), and an increase in the airborne concentration of particulate matter known to impact regional and sub-regional visibility and human health (TRPA 1982b[1])."
  - "Recommendations for Additional Actions – The original supposition that there is a relationship between VMT and air and water pollutant loads needs to be further evaluated. For example, the question of what level of VMT needs to be maintained in order to avoid excessive loading of nitrate to Lake Tahoe, should be addressed by research. Alternatively, consider revising the VMT Threshold Standard to better measure the use alternative modes of transportation."

The decreased reliance on the specific VMT standard of 2,067,600 as a Lake Tahoe water quality threshold is evident in the Tahoe Metropolitan Planning Organization (TMPO)/TRPA *Mobility 2035 Regional Transportation Plan/Sustainable Communities Strategy ER/EIS* (2012a). The adopted project (Alternative 3 in the plan) was projected to result in a VMT of 2,131,000 in 2035 (TMPO and TRPA:3.3-49). As stated in the Draft EIR/EIS:

> Impact 3.8-3 Lake Tahoe TMDL attainment and Lake clarity. All RTP/SCS alternatives would assist with attaining the Lake Tahoe TMDL program goals, because Transportation Strategy Packages A, B, and C include stormwater-control projects specifically designed to address TMDL requirements and help reach or maintain the threshold standard for water quality and Lake clarity. The benefits of

[1] The 1982 reference is to the TRPA Environmental Thresholds Carrying Capacity Study Report (May 1982. 29pp.).

reduced pollutant loads from stormwater-control projects would be substantial. All alternatives would result in a beneficial impact in helping support TMDL program attainment and Lake clarity.

While the adopted Alternative 3 would be mitigated to keep its VMT within the TRPA thresholds (see TRPA Regional Plan Update EIS [the land-use companion document to the RTP/SCS EIR/EIS] Mitigation Measure 3.3-3, page 3.3-49), the TMPO EIR/EIS analysis appears to reflect the higher VMT. In the 40+ years since the VMT threshold was first established, substantial study of the contributing factors and controls needed to improve lake clarity has contributed to a better understanding of the relationship between vehicle travel and water quality. While VMT and its related effects—tailpipe emissions and crushed abrasives—have a direct role in lake clarity, these issues are continuing to be addressed with ongoing investments in stormwater control, as well as improvements in vehicle emissions controls. The EIR/EIS goes on to explain how nitrogen loading from mobile sources is expected to be reduced substantially by 2035. In fact, this follows a dramatic trend in the reduction of tailpipe emissions of nitrogen oxides (NOx) since the time the TRPA threshold was first established in 1982. In 1981, the U.S. Environmental Protection Agency (USEPA) established a NOx tailpipe emission standard of 1.0 gram per mile (gpm), a reduction from 2.0 gpm in 1977 and 3.1 gpm in 1975 (USEPA 1999). The standard, as of 2009, was 0.07 gpm, which is 7 percent of the NOx emissions standards in place in 1981. Standards are also in place to reduce NOx emissions further in the future. In short, based on emissions standards, NOx emissions from vehicles have dropped 14 fold (from 1.0 gpm to 0.07 gpm) since adoption of the threshold standard. It follows, then that the same level of VMT today would represent a commensurate reduction in NOx emissions, reducing this specific source of pollution to the Tahoe Basin (resulting in improved air quality and visibility) and to Lake Tahoe.

Finally, VMT is an inherently cumulative metric based on regional conditions. TRPA has not adopted a project-specific VMT threshold. Section 3.1.2 of the FEIR discusses the extent to which other environmental documents (both located within and outside of the basin) analyzed project-added VMT within the basin. While VMT was calculated and disclosed in the majority of those documents, only one study applied a numeric VMT threshold and that threshold was derived from a community plan versus being a standard published by TRPA. The approach taken in the VSVSP EIR is consistent with the methods of other environmental documents (for projects both within and outside of the Basin) for addressing project-added VMT within the Basin.

ANALYSIS OF PROJECT-SPECIFIC IMPACTS IN TAHOE BASIN

Several comments assert that the EIR should have included an analysis of the impacts that will be associated with the project's increase in vehicular use within the Tahoe Basin. Based on comments received, the Final EIR calculated project-generated VMT, compared the project's VMT against the TRPA threshold standard, and determined that the standard would not be exceeded by the addition of the project generated VMT.

Importantly, the Basin-related VMT total for the project, 13,745, is a pre-mitigation total. Mitigation Measures 10-5a and 10-5b include fair-share payments to fund the project-generated incremental demand for transit service. Further, the Development Agreement that would accompany the project includes additional funding to expand TART transit services to implement Placer County's recently adopted Systems Plan Update for the Tahoe Area Regional Transit in Eastern Placer County. All of these measures would reduce VMT in the Basin, but the effectiveness cannot be easily quantified.

ANALYSIS OF CUMULATIVE VMT IN TAHOE BASIN

Several comments noted that the project's cumulative VMT impacts in the Tahoe Basin were not analyzed. As described above, the relationship between a specific VMT and lake clarity is not well understood, especially in light of substantial improvements in tailpipe emissions controls and the implementation of sediment control measures. The project-related increase in peak *summer* VMT, which is the surrogate for this issue, is estimated at 13,745. The Village at Squaw Valley Specific Plan EIR (Placer County 2016a) reported an increase of 23,843 VMT associated with that project (see Page 3-25 of the Squaw FEIR).

Another project raised in comments, the Brockway Campground project, was generally included in the cumulative analysis to the degree that details were known, but is since withdrawn from consideration. The Brockway Campground project is no longer proposed, and the site is being sold to the US Forest Service and will remain in a forested condition.

The most recent EIR that addresses cumulative VMT in the Basin is the Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project Draft EIR/EIS (June 2016b). The EIR/EIS for this project concludes the following (see pages 19-17 and 19-18 of the DEIR):

- Based on updated modeling (2014), the TRPA VMT peak summer day threshold was adjusted (downwards) to 2,030,938. (This is approximately 36,000 VMT lower than the 2,067,600 listed as the threshold on page 3-15 of the VSVSP FEIR.)
- The 2014 baseline VMT is approximately 1,937,070. (This is approximately 47,530 VMT lower than the 1,984,600 VMT listed in the VSVSP FEIR.)
- Cumulative development, including Martis Valley West, the Village at Squaw Valley Specific Plan, the Tahoe Basin Area Plan and Tahoe City Lodge project, Truckee (general plan buildout), and other cumulative development in the Squaw Valley/Alpine Meadows area, was dynamically modeled using the "TRPA TransCAD" model.
- The cumulative addition of VMT entering the Basin along SR 267 would add an estimated VMT of 12,616. The cumulative addition along SR 89 would total an estimated 29,871. The total VMT addition from out of the Basin is 42,477, per the subject EIR/EIS.
- Four alternatives are considered in the Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project Draft EIR/EIS, some of which add VMT and some of which would reduce VMT. Buildout of these alternatives would result in an existing-plus-project VMT of between 1,931,634 and 1,941,306. The addition of 2035 cumulative VMT, including from the Martis Valley West Parcel Specific Plan, would result in a cumulative VMT that ranges from an estimated 1,973,780 to 1,983,452.

It is noted that the cumulative VMT for Highway 267 in the subject EIR/EIS is less than the 13,745 shown in the Martis FEIR for the Martis West project alone. This may be due to a different model or other factors, but even if the 13,745 VMT is added on top of the results shown in the EIR/EIS, total VMT would be less than 2,000,000 and lower than the TRPA VMT threshold of 2,030,938 that was used in the Area Plan EIR/EIS.

The impact would not be cumulatively significant, and therefore the project's contribution would not be cumulatively considerable.

CONCLUSION

This response comprehensively addresses these new comments on the FEIR with respect to Lake Tahoe water quality and its relationship to VMT. The evidence suggests:

- The relationship between a specific VMT and lake water quality is not clearly understood.
- The addition of the project's VMT to existing Tahoe Basin VMT would not be significant even if the TRPA VMT threshold was used as a threshold of significance for project impacts.
- The addition of cumulative-plus-project development would result in a VMT that is below the TRPA VMT threshold; therefore, if that threshold was used as a threshold of significance for cumulative impacts, the impact would not be cumulatively significant.

Placer County therefore concludes that the FEIR conclusion is accurate and supported by evidence in the record.

PF-AG Letter

KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: (916) 445-9555
Telephone: (916) 323-3549
Facsimile: (916) 327-2319
E-Mail: Nicole.Rinke@doj.ca.gov

September 6, 2016

VIA OVERNIGHT COURIER

Paul Thompson, Interim Agency Director
Placer County Board of Supervisors
3091 County Center Drive
Auburn, CA 95603

RE: Martis Valley West Specific Plan Environmental Impact Report

Dear Mr. Thompson and Supervisors:

Our office has reviewed the environmental impact report (EIR) for the Martis Valley West Specific Plan (the Project) and respectfully submits the following comments. We request that you consider our comments and address them prior to certifying the EIR. The California Attorney General has a longstanding interest in the protection of Lake Tahoe as a state and national treasure. The Attorney General's interest dates back over four decades (see, e.g., *California ex rel. Younger v. Tahoe Regional Planning Agency* (9th Cir. 1975) 516 F.2d 215) and is as recent as our involvement in the 2012 Tahoe Regional Planning Agency (TRPA) Regional Plan Update and our submission of comments on August 9, 2016, regarding the proposed Squaw Valley Specific Plan, also pending before Placer County. Our concerns with the EIR for the Project are similar to the concerns we expressed with regard to the EIR for the Squaw Valley Specific Plan. AG-1

The Project sets forth a 20-year framework for the residential development and open space preservation of two parcels totaling over 7,000 acres. The Project is located in the Martis Valley near the Northstar Resort and the Lake Tahoe Basin (basin). The Project is located just outside of, but adjacent to, the Lake Tahoe Basin, and its entrance lies on State Highway 267, the gateway to Tahoe's North Shore. While we applaud the Project's open space preservation, because of the proximity of the proposed development to Lake Tahoe, we are concerned about the impacts the development will have within the Tahoe Basin. We are particularly concerned with the Project's resulting increases in vehicular use and traffic within the basin. The traffic issues have two components – (1) level of service impacts to specific roadway sections within the basin; and (2) increases in vehicle miles travelled and daily vehicle trips within the basin, which in turn have impacts on air and water quality and may limit the ability of environmentally beneficial redevelopment projects in the basin to go forward. These impacts are especially a concern when viewed in combination with the similar impacts anticipated from the proposed 25-year plan for the redevelopment of nearby Squaw Valley. The EIR has not adequately analyzed

September 6, 2016
Page 2

or mitigated these impacts. Increased traffic also increases greenhouse gas emissions, another issue of statewide importance, which is an identified significant impact of the Project that can and should be mitigated. As you are aware, on July 7, 2016, the Placer County Planning Commission voted against certification of the EIR and we urge you to do the same in order to address the inadequacies we have identified. AG-1 cont.

A. THE EIR INCLUDES AN ANALYSIS OF THE INCREASED VEHICLE USE IN THE BASIN THAT WILL RESULT FROM THE PROJECT, BUT FAILS TO DETERMINE WHETHER THE INCREASE IS A SIGNIFICANT IMPACT.

In its response to comments, the final EIR (FEIR) includes a discussion of the Project's impact on vehicle use within the basin. The FEIR anticipates that the Project's summer peak daily traffic would generate 1,394 daily trips traveling into the basin. (FEIR 3-17.) The TRPA, the agency charged with regulating and protecting Lake Tahoe, considers the addition of more than 200 daily trips to be a significant impact. (TRPA Code, § 65.2.3.G.) The FEIR also projects that the Project will create an estimated 13,745 additional vehicle miles travelled (VMT) on a summer Friday, an estimated .07 percent increase in VMT within the basin. The addition of the Project's VMT would bring the total VMT in the basin to 1,998,345, which is below TRPA's threshold for basin-wide VMT, but only by a small margin (the VMT threshold is 2,067,600). (FEIR 3-17.) The EIR acknowledges TRPA's standards but asserts that it need not use them as the standards of significance for evaluating the Project's traffic impacts within the basin. (FEIR 3-17.) Rather than identify an alternative standard of significance against which to measure the increase in traffic within the basin, the document's discussion of whether the increase is significant ends there. (FEIR 3-17 to 3-18.) AG-2

Lead agencies have the discretion to set standards of significance and are not required to accept significance standards adopted by agencies that will not have regulatory authority over the project. (*Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) However, if evidence is submitted showing that the environmental impact might be significant despite the significance standard used in the EIR, the agency must address that evidence. (See *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1111.) If the agency does not respond by changing the standard, it should respond by explaining the basis for the standard used. (*Id.*; see also, *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 898 [the substantial evidence standard applies to challenges to the scope of an EIR's analysis of a topic, the methodology used for studying an impact, and the reliability or accuracy of the data upon which the EIR relied].) Because Placer County did not set a standard of significance for assessing traffic impacts to Lake Tahoe, it is impossible to know whether its rejection of TRPA's standard is appropriate and supported by substantial evidence.

In addition, while Placer County, as the lead agency, may not be required to use TRPA's standards, it must still determine whether the increase in VMT in the basin that will result from the Project is a significant impact. (See *Protect the Historic Amador Waterways v. Amador Water Agency, supra*, 116 Cal.App.4th at p. 1109 [holding that even where a pertinent standard of significance exists, compliance with that standard does not relieve an agency of considering other evidence that suggests an impact may exist]; *Lotus v. Department of Transportation* (2014)

September 6, 2016
Page 3

223 Cal.App.4th 645, 654 [finding environmental document inadequate where discussion of impacts was included but without any information to enable the reader to evaluate the significance of the impacts discussed].) Because the EIR fails to identify whether the increased vehicular use within the basin is a significant impact, the EIR is inadequate. AG-2 cont.

B. THE EIR FAILS TO ANALYZE AND MITIGATE FOR THE IMPACTS ASSOCIATED WITH INCREASED VEHICULAR USE WITHIN THE TAHOE BASIN.

Although, as discussed above, Placer County in its EIR did not determine the significance of the increased vehicular use in the Tahoe Basin, it does appear that this impact will be significant. The EIR anticipates that the Project will result in more than six times the number of daily trips to the basin that TRPA would determine to be significant. (FEIR 3-17.) The EIR also projects that the Project will create an estimated .07 percent increase in VMT, bringing the total VMT in the basin within a close margin of TRPA's threshold. (FEIR 3-17.) The FEIR did not consider the impacts associated with this increase in vehicular use in the Tahoe Basin. These include impacts to air and water quality within Lake Tahoe and impacts to TRPA's ability to implement its Regional Plan and achieve its environmental goals within the Tahoe Basin. Placer County should analyze these impacts prior to certifying the EIR.

An EIR must identify all of the environmental impacts, direct and indirect, associated with a proposed project. (Cal. Code Regs., tit. 14, §§ 15123, 15126.2.) Indirect effects include secondary effects. (Cal. Code Regs., tit. 14, §§ 15358(a)(2); 15064(d)(2).) In addition, the impacts analysis must take into account the regional setting with "special emphasis" on environmental resources that are rare or unique to the region and would be impacted by the project. (Cal. Code Regs. , tit. 14, § 15125(c).) The CEQA Guidelines are clear that "[t]he EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (Cal. Code Regs., tit. 14, § 15125(c).) Here, the EIR does not include an analysis of the impacts that will be associated with the Project's increase in vehicular use within the Tahoe Basin and is, therefore, inadequate. AG-3

1. The EIR does not include an analysis of the air and water quality impacts associated with the Project's increased traffic within the basin.

The significant increase in traffic within the basin will have a direct impact on the air and water quality of Lake Tahoe. Increased vehicular use generates significant amounts of dust and leads to nitrogen deposition in the lake, which in turn causes algae growth that threatens the clarity of the lake. (See Final Lake Tahoe Total Maximum Daily Load Report, November 2010, 3-7, 7-8, and 11-11.)[1] Vehicle trips also contribute to air pollution and global warming. The

[1] The report is available at: http://www.waterboards.ca.gov/lahontan/water_issues/programs/tmdl/lake_tahoe/docs/tmdl_rpt_nov2010.pdf.

September 6, 2016
Page 4

EIR does not include an analysis of these environmental impacts to Lake Tahoe that will result from the Project's increase in vehicular use.

The traffic analysis contained in the draft EIR (DEIR) is limited to impacts to level of service on specific roadway sections. (See FEIR Chapter 10.) It was not until the FEIR, in response to comments, that Placer County considered VMT and daily vehicle trips to Lake Tahoe. (FEIR 3-17 to 3-18.) While Placer County was correct to include this analysis, the information it yielded also should have been folded into the document's analysis of air and water quality, with a particularized discussion of impacts to Lake Tahoe.

AG-3 cont.

Several commenters on the DEIR requested this analysis. Rather than revisit the air and water quality analyses, however, the FEIR suggests instead that mitigation measures proposed in the DEIR and policies incorporated into the Project to address transit impacts would address any impacts that may result from the increased vehicle use in the basin. (FEIR 3-18.) This response is legally insufficient. An EIR cannot substitute or compress its analysis of impacts with a discussion of mitigation measures. (See *Lotus v. Department of Transportation*, *supra*, 223 Cal.App.4th, at p. 656 ["By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA."].)

Interestingly, in the staff report to the Planning Commission, Placer County staff included a discussion of the air and water quality impacts associated with increased vehicular use in the basin. (See June 30, 2016, Staff Report to the Placer County Planning Commission, 5-6.) The staff report acknowledges that "the majority of vehicle-related pollutants that enter Lake Tahoe are from vehicle sources within the Tahoe Basin." The staff report goes on to conclude that "[t]hus, the 65-70 percent of vehicle trips associated with the project that would not enter the Lake Tahoe Basin would not affect Lake Tahoe water quality. Furthermore, project-related vehicle trips that would enter the Lake Tahoe Basin would remain below TRPA's VMT threshold." (*Id.*) This post-EIR analysis does not cure the EIR's deficiency and only underscores the fact that the EIR should have included an analysis of these air and water quality impacts. (See *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 [emphasizing that the EIR must contain facts and analysis necessary to ensure a meaningful public process]; *People v. County of Kern* (1974) 39 Cal.App.3d 830, 841 [requirement of detail in EIR "helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug."].)

In addition, even if the analysis provided in the staff report had been included in the document, compliance with TRPA's VMT threshold is not an adequate basis for concluding that the increase in traffic will not have impacts to air and water quality within the basin. TRPA's threshold for VMT is an environmental carrying capacity for the basin. Because it is a basin-wide carrying capacity, no single project *should* exceed the threshold. In order to achieve the thresholds, TRPA is required to adopt a Regional Plan that sets forth standards for projects and activities within the basin. (See TRPA Compact, Art. V(c).) These standards apply in addition to the thresholds and are the primary mechanism by which TRPA ensures that new development contributes to, and does not thwart, threshold attainment. Thus, these standards provide additional criteria that apply to individual in-basin projects to ensure environmental impacts are adequately mitigated.

September 6, 2016
Page 5

Of particular relevance here, TRPA's standards characterize any proposed development that creates more than 200 daily vehicle trips as having a significant traffic impact and requires an analysis of air quality impacts associated with the project prior to project approval. In addition, all new development projects are required to provide an air quality mitigation fee to offset regional and cumulative impacts. (TRPA Code of Ordinances § 65.2.) These standards apply regardless of whether or not the project will exceed the TRPA VMT threshold. As a result, it is inaccurate to suggest that compliance with the VMT threshold is sufficient to ensure that the project will not have air and water quality impacts within the basin. Further, in discussing the vehicle impacts, the document specifically indicates that it need not apply and is not applying TRPA standards in order to determine whether the in-basin impacts are significant. (FEIR 3-17 ["the proposed project does not occur in the basin and is not under the jurisdiction of TRPA, so effects on the TRPA thresholds are not used as standards of significance in this EIR…"].) It is inconsistent, on the one hand, to decline to apply TRPA's standards for purposes of the traffic analysis in the EIR, but then, on the other hand, rely on TRPA's standards post-EIR in order to conclude that the increase in traffic will not have air and water quality impacts. AG-3 cont.

Rather than point to the VMT threshold post-EIR, when it specifically elected not to apply the VMT threshold as the standard of significance in the EIR, or point to other mitigation measures, Placer County should revise and recirculate the EIR to include a meaningful analysis of the air and water quality impacts that will result from the Project's vehicular impacts within the Tahoe Basin.

2. The EIR does not include an adequate discussion of potential mitigation measures to address the impacts associated with the Project's increased traffic within the basin.

In addition to declining to analyze the Project's air and water quality impacts to the Tahoe Basin, the EIR likewise fails to discuss adequate mitigation measures that could, to the extent necessary, address these impacts. The failure to identify mitigation measures for air and water quality impacts that will occur in the basin as a result of the Project's increase in vehicular use follows, in part, from the EIR's failure to analyze these impacts and determine whether or not they are significant. Nevertheless, because Placer County points to proposed mitigation measures and policies that it claims "would reduce VMT impacts of the Project in the Basin" (see FEIR 3-18), a discussion of these measures and policies is warranted. It is also worth discussing the mitigation measures that several commenters proposed to address these impacts, as well as Placer County's discussion of these air and water quality impacts in its staff report to the Planning Commission for the Project. AG-4

a. The mitigation measures and policies Placer County points to are insufficient to address the impacts of increased vehicle use within the basin.

Placer County points to mitigation measures that have been adopted for transit impacts and policies to enhance transit built into the Project as being sufficient to reduce VMT impacts of the Project in the basin. (FEIR 3-18.) While it is difficult to gauge whether mitigation is

September 6, 2016
Page 6

sufficient when the impacts have not been quantified, in this instance the measures are facially deficient because they do not guarantee implementation of effective mitigation, nor are the mitigation measures specific to the impacts within the Lake Tahoe Basin. Regardless of the extent of the impacts, these mitigation measures are not sufficient to reduce the environmental impacts resulting from increased VMT within the basin, let alone the transit impacts they purport to address.

First, mitigation measure 10-5a consists of establishing a new Zone of Benefit or annexing into an existing Zone of Benefit to "provide adequate funding of capital and ongoing operational transit services/requirements." (DEIR 10-33.) The mitigation measure does not specify the amount of the funding obligation, nor does it identify target projects, nor is there any guarantee that the projects it identifies will improve conditions in the basin versus elsewhere in Placer County (e.g., in the town of Truckee). (See FEIR 3.5-448 [stating that the specific level of transit service improvements that would be funded has not yet been defined].) While funding contributions to improve transit could be a valid mitigation measure, the funding obligation is too vague and too disconnected from impacts within the basin to serve as a valid mitigation measure for these impacts. (See *California Clean Energy Commission v. City of Woodland* (2014) 225 Cal.App.4th 173, 197 [fair share fee to fund studies to identify strategies to address urban decay too speculative where EIR did not estimate costs, define how strategies might be implemented, or commit city to undertake actual measures to address urban decay]; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727 [requirement that project applicant pay funds to purchase replacement groundwater not adequate mitigation because it was not known whether groundwater was available].) AG-4 cont.

Second, mitigation measure 10-5b is also inadequate. Mitigation measure 10-5b consists of a requirement that the commercial and homeowner associations maintain membership in the Truckee North Lake Tahoe Transportation Management Association. (FEIR 2-21.) Membership in an association does not ensure active participation nor that any on the ground improvements will be implemented to relieve impacts related to increased vehicle use in the Lake Tahoe Basin, let alone the transit issues the mitigation measure is designed to address. (See Cal. Code Regs., tit. 14, § 15370 [defining mitigation as including activities that will avoid, minimize, rectify, reduce, or compensate for an impact].)

Third, the policies Placer County points to are, likewise, vague and not sufficiently specific enough to ensure that there will be no impacts from increased vehicular use within the basin. For example, Placer County points to Policy CP-13 of the Project, which proposes to implement a shuttle with construction of the 340th unit of the Project (FEIR 3.3-5.) The basis for the timing of implementation of the shuttle service is not clear, nor is it clear that the shuttle would address VMT impacts within the basin – e.g., the routes for the shuttle are not specified, nor is the frequency of the service. Rather than point to these other measures and policies, Placer County should: (1) provide an adequate analysis of the vehicle impacts and associated air and water quality impacts within the basin, and (2) as necessary, propose adequate and binding mitigation measures tailored to address any significant impacts that result from increased vehicular use in the basin.

September 6, 2016
Page 7

b. Placer County should address the feasible mitigation measures suggested by commenters on the DEIR.

While the mitigation measures and policies Placer County relies upon are not adequate for mitigating impacts within the basin, several commenters suggested other measures that would specifically reduce impacts within the Lake Tahoe Basin. (See e.g., FEIR 3.3-3, 3.5-444.) Placer County has not adequately considered or responded to these suggested measures. For example, TRPA's comments on the draft EIR suggest at least two specific opportunities for mitigating in-basin traffic impacts. First, the Project could contribute traffic mitigation fees to implement transportation and transit capital improvement programs (CIP). TRPA indicates that "there are opportunities to identify those CIP elements that would result in improvements in transit services needed to reduce the trips to the Tahoe Basin by individual automobiles." Second, TRPA suggests that opportunities exist to set up "ongoing operations funding streams in amounts necessary for added transit service to offset the increase in in-basin trips generated by the project." TPRA also suggests measures to encourage visitors to use public transit. (FEIR 3.3.-3.) In response to these comments, the FEIR does not discuss the feasibility or efficacy of the suggested measures, but instead points again to mitigation measures 10-5a and 10-5b and other policies contained within the proposed Project. This response by redirection does not comport with CEQA. AG-5

Another commenter suggested mitigation measures, such as fee transit subsidies for residents, shuttle service to key destinations, and recruiting of transit riders. In response, the FEIR states that these measures are not appropriate because the Project, unlike the Village at Squaw Valley Specific Plan, is "not a resort that would be controlled by the project applicant following construction and allowing for the implementation of these measures." (FEIR 3.5-444.) This is a direct but erroneous response to the mitigation measures suggested. It does not make sense that the project applicant could require the homeowner and commercial associations that will have control of the Project post-construction to maintain membership in the Truckee-North Tahoe Transportation Management Association, as mitigation measure 10-5b proposes, but not be able to require the homeowner and commercial associations to provide transit passes to residents or implement the other measures the commenter has suggested to reduce the Project's external vehicle trips. It also does not make sense that the Project Applicant plans to implement a shuttle to service the resort triangle upon construction of the 340th residential unit, but that it could not implement a shuttle to Tahoe Basin destinations or itself implement or fund the other measures the commenter has suggested.

CEQA requires that an EIR discuss mitigation measures that can minimize the project's significant environmental effects. (Pub. Resources Code, § 21002; Cal. Code Regs., tit. 14, § 15126.4.) And in particular, CEQA requires that a lead agency respond to specific suggestions for mitigation measures unless they are facially infeasible. (See, e.g., *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1029; *Flanders Found. v. City of Carmel by the Sea* (2012) 202 Cal.App.4th 603, 616; *Masonite Corp v. County of Mendocino* (2013) 218 Cal.App.4th 230, 241.) TRPA and other commenters have proposed specific mitigation measures that appear to be feasible, and Placer County must reasonably address the efficacy and feasibility of these measures.

September 6, 2016
Page 8

c. Placer County acknowledges these air and water quality impacts in its staff report to the Planning Commission, but inappropriately suggests that they need not be analyzed or addressed because of the Lake Tahoe Total Maximum Daily Load.

Placer County, in its staff report to the Planning Commission, suggests that the Lake Tahoe Total Maximum Daily Load (Lake Tahoe TMDL) and measures Placer County is implementing to comply with the Lake Tahoe TMDL will resolve any potential water quality impacts to Lake Tahoe. (See June 30, 2016, Staff Report to the Placer County Planning Commission, 5-6.) The discussion acknowledges that urban storm water represents the greatest source of fine sediment particles that impact Lake Tahoe's clarity and that "attaining the load reduction goals [of the TMDL] hinges on reducing fine sediment particles originating in urban areas and transported to the lake through stormwater runoff." (*Id.*) The staff report goes on to outline some of the measures Placer County is implementing to comply with the Lake Tahoe TMDL. (*Id.*) This post-EIR discussion cannot substitute for the County's obligation to analyze, and as necessary, mitigate the impacts of increased vehicular use within the basin as part of the EIR and Project approval process. AG-6

The measures Placer County is taking to comply with the TMDL exist independently from the Project. From our review, it does not appear that the Lake Tahoe TMDL and the measures Placer County is taking to comply with the TMDL are discussed in the DEIR or in the FEIR. Placer County is implementing those measures to comply with the regulatory demands of the Lahontan Regional Water Quality Control Board, regardless of the Project, and the Project is not contributing to those implementation measures. The only mention of the TMDL is in the staff report and even there, Placer County does not suggest that the Project is contributing to the measures Placer County is taking to comply with the TMDL. Rather, Placer County discusses the TMDL not as a mitigation opportunity for the Project, but as a reason mitigation of the Project's air and quality impacts related to vehicle use within the Basin is not necessary – an erroneous conclusion.

The Lake Tahoe TMDL is not a panacea. The TMDL is a regulatory program that requires local jurisdictions to take measures to minimize pollutant loading to Lake Tahoe. The implementation of these load reduction measures does not mean that Placer County should not be concerned about new projects that add pollutants that will later need to be prevented from entering Lake Tahoe. The more pollutants there are in the environment, the harder it will be to prevent loading into Lake Tahoe.[2] Indeed, the TMDL is just one piece of a complex regulatory puzzle that applies in tandem with other policies and regulations designed to protect Lake Tahoe. Placer County cannot use the TMDL in lieu of complying with CEQA by accounting for the Project's resulting increase in vehicular use in the Lake Tahoe Basin.

---

[2] If anything, the Project may actually make it more difficult to achieve the TMDL. The staff report's discussion of the TMDL only underscores that the EIR should have included an analysis of the Project's impacts on Lake Tahoe's water quality. (See *supra* at 3-5.)

September 6, 2016
Page 9

Further, even if Placer County could to some degree rely on the TMDL to mitigate impacts of the Project (e.g., perhaps the Project could contribute funding to enhance the implementation measures Placer County is taking to comply with the TMDL), it needs to first analyze and quantify the impacts in the EIR; and second, as necessary, propose and require implementation of adequate mitigation measures in a recirculated EIR. (See Pub. Resources Code, § 21092.1 [requiring recirculation when significant new information becomes available]; Cal. Code Regs., tit. 14, § 15088.5 [defining significant new information as information showing a new significant impact, or feasible mitigation measure not previously analyzed that would clearly lessen the project's impact, or where the draft EIR was so fundamentally inadequate and conclusory that meaningful public review was precluded].) AG-6 cont.

3. The EIR must analyze the impacts of the Project's increased vehicle use within the basin on TRPA's Regional Plan and attainment of environmental goals.

In addition to considering the air and water quality impacts to Lake Tahoe that would result from the Project's increase in vehicular use in the basin, the EIR also needs to consider the impact this increased vehicle use will have on TRPA's ability to implement its Regional Plan and attain its environmental goals. CEQA expressly requires that the EIR discuss any inconsistencies between the proposed project and any applicable regional plans, including the regional land use plan for the protection of the Lake Tahoe Basin. (Cal. Code Regs., tit. 14, § 15125(d).) AG-7

After the Project is constructed there will only be a small margin of VMT remaining before TRPA's basin-wide VMT threshold is met. With so little VMT remaining, in-basin projects may not be able to move forward. Further, if new out-of-basin projects are allowed to ignore the TRPA thresholds, they could easily exceed the basin's environmental carrying capacity without identifying this as a significant impact or providing adequate mitigation. This could preclude new development and redevelopment within the basin, which is a particular concern because the 2012 Regional Plan Update relied upon redevelopment as the means for environmental improvements that would allow TRPA to attain other thresholds (e.g., lake clarity). In the 2012 Regional Plan Update, TRPA recognized the critical need to redevelop aging infrastructure with new, environmentally beneficial development. Environmental redevelopment within the region results in substantial reduction of fine sediment and nutrient deposition, the pollutants degrading Lake Tahoe's famed clarity and blueness. As TRPA pointed out in its comment letter on the draft EIR, "[t]he environmentally beneficial redevelopment relied upon by TRPA may be threatened by unmitigated out-of-basin increases in trips and VMT. As a result of VMT capacity used elsewhere, efforts to protect Lake Tahoe may suffer without the ability to approve in-basin development." (FEIR 3.3-4.)

The EIR must disclose and consider the impact the Project will have on implementation of TRPA's Regional Plan and the attainment of environmental thresholds in Lake Tahoe. It is entirely inconsistent with the purposes of CEQA to allow a development project to move forward without consideration of the totality of the environmental impacts it will cause, especially where a unique resource, such as Lake Tahoe, will be affected. As the CEQA Guidelines make clear:

September 6, 2016
Page 10

> Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to the region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.

AG-7 cont.

(See Cal. Code Regs., tit. 14, § 15125(c).) Because the EIR has not fully considered the regional impacts of the Project, it is inadequate and should not be certified.

4. The EIR needs to analyze the impacts associated with the increase in vehicle use within the basin from past, current, and probable future projects.

The information regarding VMT and daily vehicle trips to the Tahoe Basin also must be considered in the EIR's cumulative impacts analysis. The EIR sets forth a framework for considering cumulative impacts. It identifies a list of "probable future projects" that may, in conjunction with the Project, result in impacts that are cumulatively significant. It then considers the cumulative impacts with regard to particular resources within the chapter on the individual resource. (DEIR 4-2, FEIR 3-8.) The increase in vehicular use and the associated impacts to the Tahoe Basin were not discussed in the DEIR, either individually or cumulatively. The "transportation and circulation" chapter of the DEIR only focused on impacts to individualized roadway segments, not to regional traffic implications in Tahoe (DEIR Chapter 10). The air and water quality sections likewise did not reflect consideration of this information. As discussed above, the air and water quality analyses were done at the DEIR stage without the benefit of the VMT and daily trip information for the Tahoe Basin, which was only provided at the FEIR stage. Therefore, these sections do not provide an analysis of the individual or cumulative air and water quality impacts associated with the increase in traffic in the Lake Tahoe Basin.

AG-8

The omission of an analysis of the cumulative impacts of increased vehicular use and associated impacts within the Tahoe Basin is particularly concerning, given the pending Squaw Valley Specific Plan and other projects that are identified by the EIR as appropriate for consideration of cumulative impacts. (DEIR 4-4 to 4-8) The EIR identifies several projects that are likely to cause increases in traffic and associated impacts on their own, as well as cumulatively with the Project, including the Brockway Campground (proposed for development on land adjacent to the Project and formerly part of the proposed Project), the Homewood Mountain Resort Ski Area Master Plan, Boulder Bay, and the Kings Beach Commercial Core Improvement Project. (*Id.*) Combining the Project's traffic impacts with the traffic forecasted to result from the Squaw Valley Specific Plan alone will result in the addition of nearly 3,000 daily trips to the Tahoe Basin and an increase in VMT of 1.9%, bringing total VMT in the Basin to 2,022,187, just a small margin below TRPA's threshold of 2,067,600 total basin-wide VMT. It is entirely conceivable that when combined with these other projects, the VMT threshold for the basin will be exceeded.

September 6, 2016
Page 11

An EIR must discuss cumulative impacts when they are significant and the project's incremental contribution is "cumulatively considerable." (Cal. Code Regs., tit. 14, § 15130(a).) A project's incremental contribution is cumulatively considerable if "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Cal. Code Regs., tit. 14, § 15065(a)(3).) If the lead agency concludes that a cumulative impact is not significant, the EIR must include a brief explanation of the basis of the finding and identify the facts and analysis supporting it. (Cal. Code Regs., tit. 14, § 15130(a)(2).) Here, the EIR plainly does not discuss the cumulative impacts of the increase in vehicle use and the associated impacts on air and water quality or the impacts to TRPA's ability to implement its regional plan and attain environmental goals within the Lake Tahoe Basin. The EIR must be revised to address these impacts. AG-8 cont.

C. THE EIR'S DISCUSSION OF ROADWAY SERVICE IMPACTS WITHIN THE BASIN IS INADEQUATE.

As discussed above, the EIR does not adequately discuss the Project's impact on increased vehicular use or its associated environmental and regional effects within the Tahoe Basin. In addition, the EIR's analysis of roadway service impacts within the basin as a result of the increased traffic is inadequate because it does not fully disclose and mitigate the roadway service impacts of the project.

1. The EIR fails to provide an adequate discussion of potential mitigation measures for the significant roadway service impacts in the Tahoe Basin. AG-9

The EIR indicates that the proposed Project would add up to 1,195 cars to the segment of SR 267 from the Project to SR 28.[3] (DEIR 10-30.) This segment currently operates at an unacceptable level of service (LOS) E. (DEIR 10-29.) LOS rankings range from A-F, with F being the worst. Placer County considers LOS E to be unacceptable. (*Id.*) Placer County also considers an increase in the volume-to-capacity ratio of greater than .05 for segments that are already unacceptable to be a significant impact. (DEIR 10-18.) SR 267 already operates at unacceptable LOS E. In addition, with the Project the conditions on SR 267 will experience an increase in volume-to-capacity that exceeds .05. The traffic impacts on this segment of SR 267 are, therefore, considered to be significant. (DEIR 10-29). The EIR further concludes that because there are no capacity-increasing improvements planned for this segment of SR 267, the impacts to LOS on this segment are significant and unavoidable. (DEIR 10-32.) The EIR fails to consider any other potential mitigation measures that could reduce the severity of this traffic impact.

[3] It is unclear how this number is lower than the estimated number of daily vehicle trips the Project will add to the Tahoe Basin, estimated to be 1,394 daily trips, as this segment of SR 267 terminates in the Tahoe Basin and is the only direct route from the Project to the Tahoe Basin.

September 6, 2016
Page 12

CEQA requires that an EIR discuss mitigation measures that can minimize the project's significant environmental effects. (Pub. Resources Code, § 21002; Cal. Code Regs., tit. 14, § 15126.4.) Here, there are a number of measures that could be implemented to reduce the number of trips from the Project to the Lake Tahoe Basin, ranging from incentives for visitors to take public transit, guest shuttles to Tahoe attractions, increasing transit services, or a reduced project density. Although several commenters on the DEIR requested consideration of additional measures, the FEIR declined to consider or adopt these additional measures. (See e.g., 3.5-444, and 3.5-282.) For example, the North Tahoe Preservation Alliance suggested measures to increase transit usage on SR 267 including funding of marketing and signage, implementation of fare free routes, providing free tickets to targeted groups and/or residents, partially subsidizing fares for certain groups, and funding transit stop upgrades. (FEIR 3.5-282.) In response, Placer County points to mitigation measures 10-5a and b and asserts that "no additional measures are necessary." (FEIR 3.5-322.) Placer County cannot, however, dismiss suggested mitigation measures unless the impacts are otherwise reduced to less-than-significant levels or the mitigation measures proposed are infeasible. (See, e.g., *Los Angeles Unified School District v. City of Los Angeles*, *supra*, 58 Cal.App.4th at p. 1029; *Flanders Found. v. City of Carmel by the Sea*, *supra*, 202 Cal.App.4th at 616; *Masonite Corp v. County of Mendocino, supra,* 218 Cal.App.4th 230 at p. 241.) Placer County should discuss whether additional improvements could be made to improve or encourage transit usage as suggested. AG-9 cont.

Placer County also asserts that because there is a fee program in place and because that program does not include improvements to SR 267 between the Project and SR 28, it is relieved of its obligation to mitigate LOS impacts on this roadway segment. (FEIR 3.5-258.) In support for this assertion, Placer County cites to *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 913. (*Id.*) *Tracy First* involved traffic impacts to an intersection that was within the jurisdiction of the county, not the city that was approving the project. Because the county did not have a plan in place to improve the intersection, the court held that the city was not required to itself create and implement a plan to improve the intersection. In contrast, here the roadway segment at issue is within Placer County's jurisdiction and the fee program is Placer County's own Capital Improvement Program (CIP). (FEIR 10-17.) In addition, the commenters have not suggested, nor do we suggest, that Placer County needs to revise the CIP to include the addition of lanes to SR 267. Rather, the commenters have suggested that Placer County consider other mitigation measures, such as improvements to transit and providing incentives to visitors to use transit. *Tracy First* does not support the proposition that Placer County need not consider these alternative potential mitigation measures.

Placer County also cites to CEQA Guidelines section 15162.4, which requires that mitigation measures be "roughly proportional" to a project's contribution to an impact. (FEIR 3.5-258.) This section is inapplicable to Placer County's consideration of the other mitigation measures suggested, as the County does not assert and provides no evidence that the mitigation measures would be disproportionate to the Project's contribution to traffic or traffic-related impacts.

September 6, 2016
Page 13

2. The EIR's cumulative impacts analysis for roadway service impacts is inadequate.

The EIR's analysis of cumulative impacts is also inadequate with respect to the roadway service impacts within the Tahoe Basin. The EIR finds that the cumulative roadway service impacts within the Tahoe Basin, along SR 267 to its intersection with SR 28, will be significant and unavoidable. (DEIR 10-31.) While we do not disagree with that conclusion, the EIR seems to omit consideration of several significant pending projects that will also impact roadway service along SR 267 to SR 28 in its analysis. Thus, the analysis is inadequate and likely underestimates the cumulative traffic impacts of the Project. AG-10

The EIR identifies "probable future projects" for consideration of cumulative impacts within individual resource chapters of the document. (DEIR 4-3.) However, it does not appear that this list was used for the traffic analysis. Rather, the traffic analysis states that "the cumulative setting associated with the traffic analysis is based on the Town of Truckee's TransCAD traffic model, which provides forecasts of traffic volumes throughout Truckee as well as the Martis Valley portion of Placer County." (DEIR 10-37.) It is not clear if this model would include pending projects within the Tahoe Basin. There are several projects pending within the basin that will likely impact traffic within the basin and traffic along SR 267, which should be considered in the cumulative impacts analysis, including the Homewood Mountain Resort Ski Area Master Plan, Boulder Bay, and the Kings Beach Commercial Core Improvement Project.[4] All of these projects were identified by Placer County as "probable future projects" in the DEIR (DEIR 4-5 to 4-8) but, again, this list was not used for the cumulative traffic analysis. Further, all of these projects will have potentially significant traffic impacts in and around the intersection of SR 267 and 28 (e.g., Boulder Bay is anticipated to generate 3,415 daily trips within the Tahoe Basin) and should have been considered when evaluating the Project's cumulative traffic impacts within the basin.

D. THE EIR'S GREENHOUSE GAS ANALYSIS IS FLAWED AND INADEQUATE.

As the EIR recognizes, the increases in atmospheric concentrations of greenhouse gases (GHGs), due largely to fossil fuel consumption, are expected to impact California with increasing severity over time. (DEIR 12-1, 2.)[5] These potential impacts by just 2050 include AG-11

[4] Several commenters expressed concern that the Brockway Campground and Squaw Valley Specific Plan were not included in the cumulative traffic analysis. (See e.g., FEIR 3-4 and 3.5-96.) While it appears that these plans were not included in the analysis, Placer County has indicated that the model assumed full build out of the land use allowances at Squaw and full build out of the Project, which would have included residential development on the Brockway Campground site, both of which would have amounted to greater development than currently being proposed. (See e.g., FEIR 3.5-163.)

[5] The draft EIR relies on key reports from the Intergovernmental Panel on Climate Change and the California Natural Resources Agency.

increases in average statewide temperatures of 2.7° F above 2000 averages, a Sierra snowpack decrease of 25 to 40 percent from historic average, sea level rise of 10 to 18 inches along the California coastline, and increased frequency and intensity of forest fires. (DEIR 12-2.)

In this context, the need for addressing our continuing contribution to atmospheric GHG pollution is well recognized. Because GHGs persist in the atmosphere for decades and in some cases millennia, in order to stabilize the climate and avoid the most catastrophic outcomes of climate change, the science informs us that we must substantially reduce our annual statewide GHG emissions over time, achieving a low carbon future by mid-century. While the EIR recognizes the leadership role California has played at the State level (DEIR 12-3 to 12-6),[6] it is also the case that "[a]s the State shifts its climate focus to the long-term, regional and local governments and agencies will play an increasingly important role in achieving California's goals." (See First Update to the Climate Change Scoping Plan (May 2014) (hereafter the "Scoping Plan Update"), at D1-3.)[7] For example, the Scoping Plan Update notes that while "[the California Air Resources Board] has effective regulations to increase vehicle fuel efficiency and lower the carbon intensity of fuel," increases in vehicles miles travelled (VMT)—which local governments can influence through land use planning on a project level—is undoing some of those gains. (*Id.* at D1-2.) "One of the most critical, cross-cutting issues for addressing climate change and other integrated policy priorities is land use and development," an area where local and regional governments have broad influence. (*Id.* at 103, 111.) AG-11 cont.

1. Summary of the EIR's GHG Analysis.

In the DEIR, the County uses two different benchmarks to measure significance, labeled "Tier I" and "Tier II." (DEIR 12-9.) Tier I states that operational emissions of a project would not have a significant impact on the environment if they are less than 1,100 metric tons of carbon dioxide equivalent per year ($MTCO_2e$/year). Tier II states that operational emissions that exceed 1,100 MTCO2e/year, but that are also 21.7 percent reduction from a "no action taken" (NAT) scenario compared to the proposed project operating in 2020, would not conflict with the ARB Scoping Plan and would thus not be significant. There are, however, significant shortcomings with the Tier II approach, including that the Project would extend well beyond 2020, and, in addition, the EIR fails to include a reasoned explanation connecting the 2020 statewide reduction objective to this particular development project. (*See Center for Biological Diversity v. Dept. of* AG-12

[6] Most recently, the Legislature passed SB 32, which now has been enrolled and is awaiting action by the Governor. SB 32 directs the California Air Resources Board, "in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions authorized by [AB 32], to ensure that statewide greenhouse gas emissions are reduced to at least 40 percent below the statewide greenhouse gas emissions limit no later than December 31, 2030." (Sen. Bill 32, 2015-16 Reg. Sess.) SB 32 expresses the State's continuing commitment to addressing climate change over the long term, consistent with the science.

[7] The Update and its appendices are available at https://www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm.

September 6, 2016
Page 15

Fish and Wildlife (2015) 62 Cal.4th 204, 226 [noting that "a greater degree of reduction may be needed from new land use projects than from the economy as a whole"].)

In the FEIR, the County excised the Tier II analysis, and relied solely on Tier I. (FEIR 2-21.) The FEIR determines that the Project's GHG emissions would be significant because they exceed the 1,100 $MTCO_2e$/year benchmark. (FEIR 2-21 to 2-23.) Under CEQA, this determination gives rise to a legal obligation to impose feasible measures to mitigate the impact. (Pub. Resources Code, §§ 21002; Cal. Code Regs., tit. 14, § 15126.4.) If the public agency rejects a mitigation measure or alternative as infeasible, the agency must make specific findings, supported by substantial evidence, that a mitigation measure or alternative is not feasible. (Pub. Resources Code, §§ 21081 and 21081.5.)

AG-12 cont.

Here, the FEIR identifies a number of *potential* mitigation measures, including the following:

- Requiring that all buildings exceed Title 24 energy-efficiency requirements by 15 percent.
- All new residential buildings shall meet or exceed the guidelines for the California ENERGY STAR® Homes Program Policy (Policy ER-AQ5).
- Selecting a building's orientation, massing and fenestration design to maximize effective day lighting to reduce building energy requirements and use of exterior sun controls (Policy ER-AQ6).
- Efforts to reduce and recycle construction waste are required as well as regional procurement of construction materials when feasibly possible in order to reduce transport (Policy ER-AQ14).
- Installation of state-of-the-art energy efficient interior lighting (Policy ER-AQ17).

(FEIR 2-26.)

In addition, the DEIR refers to various Martis Valley West Parcel Specific Plan Policies that are applicable to an evaluation of GHG emissions. The policies identified include:

- Prohibition of wood burning stoves.
- Use of Energy Star or equivalent windows, appliances, water heaters and air conditioning systems.
- Use of water-efficient fixtures.
- Native and drought tolerant landscaping.
- Collection bins for recycling at businesses.
- A covered bus shelter/transit stop.
- Development of a network of pedestrian, cross-country skiing, hiking and bike trails.

September 6, 2016
Page 16

- A Homeowners Association (HOA) shuttle to reduce single-occupancy vehicle trips.

(DEIR 12-9.)

While the FEIR and DEIR respectively contain the above described lists of measures that could mitigate GHG emissions from the Project, neither document appears to adopt them as enforceable mitigation. This raises two concerns.

As discussed in Part a. below, while the FEIR adds significantly to the DEIR's list of potential mitigation measures, it defers consideration of those measures to the time at which a subdivision map for particular phases of the development are submitted. At that point, the developer has a renewed opportunity to make a Tier II-type argument that the piece of the Project meets a "statewide GHG reduction goal"; if it is does, then no further mitigation will be required. If it does not, then the development "can choose" from seven listed options (e.g., requiring that new residential buildings meet or exceed the guidelines for the California ENERGY STAR® Homes Program Policy). The FEIR makes no showing, however, that it would be infeasible or impractical to adopt these mitigation measures now, at the time of Project approval. Nor does it contain any analysis establishing that a statewide-target-based benchmark can be developed for this individual Project, or that future development phases will meet that yet-to-be developed target by implementing only the measures listed. Further, the FEIR appears to offer the developer the opportunity to re-open a significance determination that must be made at the time this Project is approved. For these reasons, the FEIR improperly defers both mitigation, and the significance determination itself, to future phases of the project. AG-12 cont.

And, as discussed in Part b. below, the FEIR falls short for its lack of consideration of all feasible mitigation measures in at least two respects. First, it fails to discuss how the Project could meet the relevant regional transportation targets. Second, the FEIR appears to have missed a broad range of potentially feasible mitigation measures, either because it fails to identify them in the first instance or because it identifies them but declines to consider them as mitigation.

a. The EIR improperly defers the significance determination and mitigation.

It is generally inappropriate to defer formulation of mitigation measures to the future. (Cal. Code Regs., tit. 14, § 15126.4(a)(1)(B).) A lead agency can defer mitigation where formulation of the precise means of mitigating impacts is truly impractical at the time of project approval or where practical considerations prohibit devising such measures early in the planning process. (*Sacramento County Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1028-1029.) To defer mitigation consistent with CEQA, the EIR must set forth criteria governing future actions to implement mitigation, and the agency must have assurances that future mitigation that is both "feasible and efficacious" will in fact be implemented. (*Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17.) AG-13

September 6, 2016
Page 17

Here, the FEIR fails to explain why formulation of the precise means of mitigating impacts of GHG emissions is "truly impractical" at this stage. Absent such a showing, the adoption of feasible mitigation measures should occur at the time of approval. Indeed, as noted above, the DEIR and FEIR each identify Project policies that have already been formulated and, if made mandatory, could qualify as mitigation measures. (See DEIR 12-9; FEIR 2-26.) Placer County has determined that the Project will result in significant GHG impacts, but has failed to make mandatory the specific measures it has identified for mitigating GHG impacts. This is impermissible under CEQA.

In addition, as the CEQA Guidelines state, the advantage of doing a programmatic EIR is to:

> [p]rovide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action, [e]nsure consideration of cumulative impacts that might be slighted in a case-by-case analysis, [a]void duplicative reconsideration of basic policy considerations, and [a]llow the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts…."

AG-13 cont.

(Cal. Code Regs., tit. 14, § 15168, subds. (b)(1)-(b)(4).) As the DEIR and FEIR acknowledge, GHG emissions are a significant impact and a cumulative impact. As such, those emissions should be addressed at the programmatic level.

Further, Placer County appears to allow future phases of the Project to revisit the significance determination when determining whether mitigation will in fact be required. As described in the FEIR, no mitigation will be required if the applicant demonstrates upon future submittal of each separate subdivision map that the operation of the Project (or County projects generally, if it has adopted a climate action plan) will be consistent with then-existing statewide GHG targets, provided there is a substantiated linkage between the Project or the County Plan and the statewide GHG target. (FEIR 2-25.) This test is essentially the same as the County's Tier II threshold of significance test, which the County elected not to rely on as a significance criteria for this Project. (FEIR 2-21.) We are aware of no legal authority that would allow an agency to take back its determination that a project's impacts are significant, and by leaving this option open in the FEIR, the County effectively has avoided its obligation to make a significance determination *before* it approves the Project. This is error.

In addition, we are concerned that the FEIR improperly shifts the burden of making this Tier II type showing at a later stage onto the developer. (See *Cal. Clean Energy Comm.*, *supra*, 225 Cal.App.4th at p. 195 [mitigation measure violated CEQA for shifting the responsibility to the developer to produce the studies].)

September 6, 2016
Page 18

b. The EIR improperly disregards potential mitigation measures.

The FEIR falls short for its lack of consideration of all feasible mitigation measures in at least two respects. First, the FEIR does not discuss how the Project could meet the transportation targets set by the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (SCS). That Plan obligates Placer County to meet 16 percent per capita vehicle emissions reductions by 2035. (DEIR 12-15.) Having referenced the SCS targets as potentially relevant to the significance determination, the FEIR fails to analyze the feasibility of meeting them or of imposing the mitigation measures contained in the SCS. Rather, the FEIR appears to reject the SCS, not because it is infeasible, but because it "is geared toward GHG emissions from transportation only." (FEIR 12-15.) Transportation comprises over one-third of the projected GHG emissions from the Project. Having determined that the Project's GHG emissions would be a significant impact, and having further acknowledged that the Project is within the jurisdiction of the SACOG MTP/SCS, Placer County has provided no basis for not analyzing the feasibility of adopting the SCS's policies and strategies to mitigate the Project's impacts. AG-14

Second, missing from the mitigation measures discussed in the FEIR are a range of other potential measures that have been identified by regional and local governments as effective. For example, there is no indication the EIR has considered the feasibility of the following types of GHG-reducing measures:

- Requiring the Project meet a percentage of its anticipated electricity requirements with rooftop solar installations.
- Requiring use of solar or electric water heating.
- Providing the infrastructure to support car-sharing stations and electric vehicle charging.
- Requiring the use of electric powered landscaping equipment.
- Requiring the use of construction equipment that uses alternative fuels.
- Limiting the idling of construction equipment.
- Setting mandatory minimum waste diversion requirements.

(See, e.g., Climate Action 2020 and Beyond, Sonoma County Regional Climate Action Plan, Appendix A.) In addition, the DEIR mentions a number of Project policies—which may or may not be mandatory—that could mitigate GHG emissions, but declines to analyze their feasibility or to adopt them as enforceable mitigation measures. (DEIR 12-9.) There may be valid reasons for finding that some of the policies suggested above and those listed in the DEIR are not feasible, but the FEIR fails to conduct such an analysis. Unless and until the FEIR analyzes all feasible mitigation measures, its finding that the Project's GHG significant impacts are "unavoidable" is not supported.

Placer County has an opportunity now to consider and implement Project-wide mitigation measures that could achieve significant cumulative GHG reductions consistent with long-term

September 6, 2016
Page 19

state goals. To that end, the FEIR should evaluate the GHG impacts of this Project in the context of those long-term goals, propose robust Project-wide mitigation measures, and analyze the feasibility of implementing those measures. It fails to do so. AG-14 cont.

In conclusion, the FEIR should be revised and recirculated to adequately address the Project's GHG impacts and potential impacts to Lake Tahoe. Climate change is a critical issue for California and Lake Tahoe is a national and state a treasure and Placer County should not disregard impacts in these areas in reviewing the Project. More information is needed to fully understand what the Project's impacts will be on greenhouse gas emissions and on Lake Tahoe. We appreciate your consideration of our comments and hope that the County will undertake a full consideration of the Project's impacts to Lake Tahoe and GHG emissions prior to certifying the environmental document and reviewing the Project for approval. AG-15

Sincerely,

NICOLE U. RINKE
Deputy Attorneys General
DAVID ZONANA
Supervising Deputy Attorney General

For KAMALA D. HARRIS
Attorney General

NUR:pc

SA2001IN1046

AG

State of California, Department of Justice
Nicole U. Rinke and David Zonana, Deputy Attorneys General
September 6, 2016

AG-1 The comment summarizes the interest of the Attorney General in the Martis Valley West Parcel Specific Plan project, the project itself, and specific concerns, which are presented in more detail in the body of the letter. See responses below.

AG-2 The comment correctly summarizes information included in the FEIR Master Response related to "Vehicle Miles Traveled and Added Vehicle Miles in the Tahoe Basin," but makes the incorrect conclusion that the Master Response results in the EIR not using TRPA's standard of significance for evaluating the project's traffic impacts within the Basin. As noted in Master Response, the FEIR acknowledges the 2,067,600 threshold, and as identified in the comment, makes a conclusion that the project would not result in an exceedance of this threshold.

In accordance with CEQA and the State CEQA Guidelines, the Draft EIR focuses on potentially significant impacts. Because Placer County does not have a VMT standard, and is not required to use the standards of another agency, no specific significance criterion was developed. Again, in response to public comments, the Final EIR provided additional information: it calculated the contribution of project generated VMT to the Basin, identified the proportionate increase represented by the addition (0.7 percent increase), and determined that it would not cause TRPA's threshold standard to be exceeded. Therefore, the impact is less than significant.

The comment suggests that TRPA considers "the addition of more than 200 daily trips to be a significant impact." This is not correct. TRPA Code defines 200 daily trips as a "significant increase" in trips which, according to Code, is the trigger for requiring a traffic and air quality analysis. This is not the same as a "significant effect" under CEQA. TRPA essentially has a "net zero" threshold, and requires payment into the air quality mitigation fund for any project, regardless of size, that results in a "change in operation" defined, in part, as any additional trip generation. Placer County has not adopted such a stringent air quality threshold, but instead determines impacts based on degradation of levels of service at intersections and roadway segments, exceedance of APCD emissions thresholds, and other criteria.

AG-3 The comment suggests that the project's generation of vehicle use in the Tahoe Basin would result in significant impacts. The comment invokes TRPA's 200 daily trip trigger to arrive at this conclusion (see response to comment AG-2, above).

The comment asserts that the EIR should evaluate impacts to air and water quality in the Basin that could directly result from increased traffic and associated increases in dust and nitrogen. See Master Response: Project-generated Vehicle Miles Traveled in the Tahoe Basin and its Potential Air and Water Quality Effects, attached hereto. Note that, although additional modeling of VMT in the Basin was included in the Final EIR, this discussion did not revise the overall trip generation assumptions for the project. As such, the effects associated with regional concerns – for example, impacts to air quality - would not be influenced by this additional detail. In addition, the MVWPSP EIR thoroughly evaluated traffic and air quality impacts, including in the Basin (see Chapters 10 and 11 of the Draft EIR, as modified by the Final EIR). Mitigation measures for both traffic and air quality impacts, including expansion of transit service that would reduce traffic impacts to the Basin, are included in the Draft EIR, as supplemented by the Final EIR.

AG-4 The comment states that the EIR does not discuss mitigation measures that could address the project's air and water quality impacts to the Tahoe Basin, and suggests that Placer County points to mitigation measures for transit impacts as being sufficient to reduce VMT impacts in the Tahoe Basin. To the contrary, because no significant air and water quality effects resulting from increased vehicle use in the Tahoe Basin have been identified, no mitigation measures are required. As noted in the comment, the mitigation measures included in the EIR to improve traffic and transit conditions would also serve to reduce in-Basin VMT. Please see Master Response: Project-generated Vehicle Miles Traveled in the Tahoe Basin and its Potential Air and Water Quality Effects.

AG-5 The comment suggests that Placer County should address the feasible mitigation measures suggested by commenters on the Draft EIR. In fact, these mitigation measures are addressed in respective responses to comments, and many are already incorporated into the project, or committed to by the project applicant (see below). The only vehicle-travel-related impact to the Tahoe Basin identified in the analysis is the contribution of project-generated traffic to the roadway segment of SR 267 between the project access roadway and SR 28 (the portion of SR 267 within the Tahoe Basin is from Brockway Summit to SR 28, a distance of approximately 2.75 miles). This segment currently operates at level of service (LOS) E in the summer and winter peak hours, and while it would continue to operate at LOS E after addition of the project, the contribution by the project would increase the volume-to-capacity (V/C) ratio by 0.07 in the summer peak hour, and by 0.05 in the winter peak hour. A significance criterion of 0.05 increase in V/C ratio was used in the analysis, as described on pages 10-18 and 10-19 of the Draft EIR. (Note: Although impacts to transit were initially determined in the Draft EIR to be potentially significant, review of TART transit ridership data show that bus service would remain within capacity in both the winter and summer seasons. The applicant has committed to retaining Mitigation Measures 10-5a and 10-5b, which would provide an ongoing funding stream [one of the measures recommended in the comment] to improve transit in the region.) With regard to the project's significant impact on the SR 28 roadway segment, the project applicant will be required to pay traffic impact fees [one of the measures recommended in the comment] to Placer County for implementation of projects in its Capital Improvement Program (CIP), including several projects to improve operations along SR 267, including potential widening outside the Basin. The Placer County CIP does not include widening of SR 267 from Brockway Summit to SR 28 and the analysis determined that there would be no feasible mitigation for the significant impact of the project on this portion of the roadway segment. Features to reduce project-generated traffic to the degree feasible are included in the project itself (e.g., community-supporting commercial uses; provision of a bus shelter at the project entrance; provision of bike racks and parking near the bus stop; Homeowners Association shuttle to reduce single-occupancy vehicle trips) and additional applicant commitments to transit funding, as described above (see also correspondence dated September 26, 2016 from the project applicant to County staff regarding Martis West – Proposals from Shute Mihaly & Weinberger (SMW) and the California Attorney General (AG), Transportation and Circulation section detailing transit subsidies, traffic impact fees, and other commitments). These measures would each, to some degree, reduce vehicle use by project occupants, which would intern reduce the number of project trips on local roadways, including the segment of SR 267 in the Basin.

For discussion of the feasibility and efficacy of mitigation measures recommended by commenters (many of which are already incorporated into the project or otherwise included) please see responses to comments: RA1-2, I06-8, I06-9, I041-39, I041-41, I041-48, I041-49, I031-26, I031-27, I032-2, and I018-81.

AG-6 The comment suggests that Placer County is using the Total Maximum Daily Load (TMDL) as rationale for not addressing air and water quality impacts to the Tahoe Basin from project-generated vehicle travel. This is not true. These impacts are less than significant (see

Master Response: Project-generated Vehicle Miles Traveled in the Tahoe Basin and its Potential Air and Water Quality Effects). The TMDL is simply described to as one of many regional programs in place to address lake clarity which, given its complexity and multitude of pollutant sources (e.g., urban runoff, fertilizers, wildfires, wood stoves, aquatic invasive species, vehicle use) is the appropriate level (i.e., regional, rather than project-specific) at which to address the issue and make meaningful progress.

AG-7 The comment states that the EIR must address the impacts of project-generated vehicle use in the Tahoe Basin on TRPA's Regional Plan and attainment of its environmental goals. With regard to the TRPA Regional Plan, it is acknowledged that TRPA is required to achieve and maintain its environmental thresholds, including a VMT standard, and it is further acknowledged that the project will generate vehicle traffic which will add VMT to the Basin (calculated to be an increase of 0.7 percent), arguably "consuming" some remaining VMT capacity. However, unlike the Lake Tahoe TMDL, which apportions pollutant loads to jurisdictions around the Tahoe Basin, there is no allocation of VMT, nor has TRPA established a per-project VMT criterion. Such an allocation, while very challenging given the complexities of vehicle travel generated from within and outside the Tahoe Basin, could theoretically be undertaken, but it has not been done. Therefore, the EIR and supporting record include information disclosing the project contribution to VMT in the Tahoe Basin; make a good faith effort to describe the current state of the science in understanding the link between VMT and air and water quality); identify project features and commitments to reduce vehicle use; and describe regional programs in place in the Tahoe Basin to improve air and water quality (e.g., the Lake Tahoe TMDL, TRPA Regional Plan, TRPA/TMPO Regional Transportation Plan, TART Systems Plan, TRPA air and water quality fee programs). After considering the information, Placer County has determined that the impact would be less than significant. The project will not substantially interfere with TRPA's ability to implement its Regional Plan and achieve its environmental goals. See also Master Response: Project-generated Vehicle Miles Traveled in the Tahoe Basin and its Potential Air and Water Quality Effects.

AG-8 The comment describes the EIR's framework and methods for assessing cumulative impacts and the project's contribution. The comment suggests that, because the EIR's cumulative analysis was completed prior to its calculation of VMT and daily trip information specific to the Tahoe Basin, that the cumulative air and water quality impacts associated with the increase in traffic in the Lake Tahoe Basin were not analyzed. Please see response to comment AG-6, above, and Master Response: Project-generated Vehicle Miles Traveled in the Tahoe Basin and its Potential Air and Water Quality Effects.

AG-9 The comment suggests that the EIR does not adequately address roadway level of service impacts in the Tahoe Basin. Please see response to comment AG-5, above.

AG-10 The comment claims that the EIR's cumulative analysis for roadway service impacts is inadequate because it is based on Truckee's TransCAD traffic model and may not consider pending projects within the Tahoe Basin, including Homewood Mountain Resort, Boulder Bay, and the Kings Beach Commercial Core Improvement Project. The traffic model used to generate traffic forecasts in the Draft EIR traffic impact study assumed development of the projects listed in the comment. A comparison of traffic volumes under existing no project conditions (Draft EIR Table 10-6) to cumulative (year 2035) no project conditions (Draft EIR Table 10-19) reveal that summer daily traffic volumes on State Route 267 north of State Route 28 are projected to increase from 12,240 to 19,400, a 58 percent increase. This represents almost a 2.5 percent per year increase in traffic on SR 267, which exceeds the historical rate of increase which has been about 1.9 percent annually. Comment PF88-2 provides a comparison of traffic increases projected for the MVCP to actual increases based on Caltrans traffic count data. The memo concludes that current traffic volumes at SR 267 and the Placer County/Town of Truckee line are lower than those projected under the MVCP.

The comment notes that the proposed MVWPSP would contribute to lower growth by removing 600 potential units from the total anticipated in the MVCP. See also response to comment PF29-21, which explains that the external trips estimated for the MVWPSP are about 50 percent higher than what would be generated following the trip rates from local count data; therefore, the trip rates used in the EIR are higher than actual rates of nearby subdivisions.

AG-11 The comment introduces the issue of greenhouse gas (GHG) emissions, emphasizes its importance, and highlights the role of land use and development in reducing GHG emissions. Comments specific to the EIR analysis of GHG emissions are contained in comments AG-12 through AG-14. See responses below.

AG-12 The comment largely summarizes the conclusions of the EIR pertaining to GHG impacts, which are found in Chapter 12 of the Draft EIR and Master Response 7 on pages 3-18 through 3-34 of the Final EIR. It lists both EIR-identified potential measures and MVWPSP policies applicable to GHG emissions reduction, and suggests that the mitigation program (Mitigation Measure 12-2) does not "adopt measures as enforceable mitigation."

The MVWPSP itself includes a variety of measures that would reduce GHGs from the project, including design considerations and other measures. As described in the Draft EIR (see page 12-9), relevant policies include prohibition on wood-burning stoves or fireplaces (Policy ER-AQ1); encouraging construction that exceeds current energy codes (Policy ER-AQ4); use of Energy Star or equivalent windows, appliances, water heaters and air conditioning systems (Policy ER-AQ5-Policy ER-AQ17); use of water-efficient fixtures (Policy ER-AQ18); native and drought-tolerant landscaping (Policy PU-3); provision of collection bins for recycling at businesses (Policy PU-12 and Policy PU-13); provision of a covered bus shelter/transit stop (Policy CP-3); development of a network of pedestrian, cross-country skiing, hiking and bike trails within the MVWPSP (Policy CP-5); and a Homeowners Association (HOA) shuttle to reduce single-occupancy vehicle trips (see MVWPSP Chapter 4, under "Transportation Management"). In addition, the MVWPSP includes a Sustainability Program (Appendix D) that summarizes the components of the MVWPSP that promote and encourage sustainable practices, such as the efficient use of energy and water. Additional mechanisms to reduce GHG emissions are provided in Mitigation Measure 12-2. As explained in the Draft EIR (Section 12.2.2) and the Final EIR (see Master Response 7), official future post-2020 targets are yet to be established, as are regulations to control emissions. These regulatory steps are essential to understanding the overall approach and degree to which the project must mitigate its impacts on climate change. Therefore, mitigation is applied to the project in a manner that allows it to adapt to future targets that are built around the State's fair share in reducing its contribution to dangerous effects of climate change.

The recent legislative battle to extend and provide new targets for the Global Warming Solutions Act of 2006 (Act) illustrates the uncertainty of predicting future GHG emissions targets and the need to maintain the flexibility to achieve them. While the Act provides for the continuation of the 2020 reduction target beyond that year, the 2030 target proposed in SB 32 was not codified at the time that the Final EIR was prepared. Governor Brown signed SB 32 and AB 197 on September 8, 2016. SB 32 essentially amends the Act to establish a target of reducing statewide GHG emissions to 40 percent below 1990 levels by 2030. This bill was passed after a two-year legislative effort (the bill was first introduced in 2015 legislative session, but did not pass that year) to establish post-2020 GHG emissions targets for the State. The bill was hotly contested and many proposed provisions (e.g., extension of Cap-and-Trade past 2020) were stripped. This is the same target identified in Executive Order B-30-15, referenced in the Final EIR (see pages 3-19 and 3-20). A new Scoping Plan will need to be drafted to identify and adopt a regulatory path toward meeting this goal, and the California Air Resources Board (ARB) will need to pass new regulations. Therefore, the

details of how the legislation will ultimately be implemented remains uncertain. The updated Scoping Plan is currently in process, but no public drafts have yet been made available.

Placer County recognizes that the goal is new and full of uncertainty with respect to implementation. Therefore, the mitigation was crafted so as to adapt to the targets in place at the time subdivision applications consistent with the MVWPSP are submitted. The precise GHG targets that will be in place in 2037, the regulations that will be adopted to facilitate their achievement, GHG emissions reductions achieved by broad emissions sectors such as energy generation and transportation, and new methods or technologies available to reduce GHG emissions cannot be known at this time. In any case, Placer County will use these targets, programs, and new information to require mitigation, to the degree feasible and consistent with the list of measures in the Final EIR, to reduce the project's GHG emissions. The mitigation also requires purchase of offsets to the degree to which the GHG targets will be met. But, because of these unknowns, and because the project's emissions are so far above the threshold of significance, the impact is considered potentially significant and unavoidable.

AG-13 The comment suggests that, because the GHG mitigation program is based on adaptation to GHG reduction goals as they are changing and as new goals are established in the future, that the EIR defers mitigation. This is not the case. In fact, this has been a common approach to GHG compliance since the adoption of AB 32 in 2006. First, see response S1-9 with regard to the relevance of statewide GHG policies and their importance in setting and meeting GHG reduction targets. As described, these policies establish a link between California and its role in GHG reduction on a global basis and, as such, are important in determining a project emission's significance. As outlined in response S1-9, a new Scoping Plan will need to be drafted to determine a regulatory path forward to meeting the goals of SB 32 and AB 197. The California Air Resources Board (ARB) will need to pass new regulations, creating a level of uncertainty in the details of how legislation will ultimately be implemented. The State is also in the process of updating its Scoping Plan. The last version of the Scoping Plan was approved in 2014 and was based on attaining AB 32 targets (achieving 1990 levels of GHG emissions by 2020). The ongoing update to the Scoping Plan is intended to achieve Executive Order B-30-15 and SB 32 targets of 40 percent below 1990 GHG emissions levels by 2030. The Scoping Plan "…defines ARB's climate change priorities for the next five years and lay the groundwork to reach long-term goals." (ARB 2016) Regulatory programs that limit GHG emissions from the energy, transportation/land use/fuels/ infrastructure, agriculture, water, waste, natural lands, short-lived pollutants, and green building sectors are developed based on the Scoping Plan.

Mitigation Measure 12-2 recognizes that both GHG emission targets and regulatory programs that limit GHGs are apt to change over the 20-year (estimate) project construction timeframe. Consequently, Placer County concluded that using a static target to assess the significance of project impacts and the type and extent of mitigation would not recognize the nature of progressing GHG programs and regulatory actions, and the degree to which they can succeed in reducing GHG emissions. In addition, as a Specific Plan, the project establishes the framework for development, but leaves considerable flexibility to subsequent projects (small lot maps) that may be submitted. Because the details of subsequent projects cannot be predicted in advance, it is appropriate to remain open to the vast array of mechanisms to achieve compliance with State GHG reduction targets. Indeed, substantial technological advances continue to be made, so such flexibility is important to a Specific Plan that may not be built out for 20 years or more.

Mitigation Measure 12-2 requires that GHG emissions associated with the project are reduced to the point that they meet GHG reduction targets, calculated with the future targets and regulatory programs that reduce GHG emissions in place at the time subdivision maps

for project phases are submitted. The targets would be based on a substantiated linkage between the State goals or a local (Placer County) GHG reduction plan. Please note that, as explained further below, Placer County is planning to initiate preparation of a GHG reduction plan.

The comment concludes that, because the exact nature of these goals has not been established, mitigation is deferred. This is not the case:

- The FEIR lays out a list of GHG reduction measures that are considered feasible (see page 3-34) and include Energy Star appliances, exceeding Title 24 energy efficiency standards, energy efficient interior lighting, and payment of GHG offset fees to an ARB-approved GHG reduction program.

- The degree to which these programs would be implemented would be based on a Placer County GHG reduction program or some other substantiated link to AB 32 targets. The County is currently planning the preparation of a GHG reduction plan, to be applied countywide, that would provide the requisite program; the plan is scheduled for completion in 2018 (Fisch, pers. comm., 2016). If the GHG reduction plan is not completed, the project can be linked to AB 32 targets through compliance with Scoping Plan programs applicable to the project. Therefore, the mitigation measure recognizes the importance of building a regulatory structure that will help attain officially passed targets and incorporating mitigation actions into the project (including offsets) that address the current gap in available regulatory information, rather than speculating on the future actions of regulatory agencies.

The comment also criticizes the EIR for only mitigating impacts to the extent shown in the Final EIR and for not addressing emissions on a programmatic level. It is unclear what is meant by this comment. In the case of GHG emissions, the EIR has evaluated the impacts; determined significance (properly concluding that the impact is potentially significant and unavoidable); established performance standards (compliance with regulatory standards in place at the time of each subsequent, project-specific development); and included an array of feasible mitigation measures that may be used to meet the target. GHG emissions may be less than shown in the FEIR, based on new (and currently unknown) regulatory programs (e.g., possible requirements for a higher percent of electric vehicles in the fleet mix and more reliance of renewable energy). Additionally, mitigation is included that requires implementing projects to demonstrate that targets will be met, including through payment of GHG offset fees, if necessary. This supports the conclusion that, far from deferral, Mitigation Measure 12-2 is designed to flexibly respond to the uncertain future of GHG policies and programs.

The comment also states that Mitigation Measure 12-2 allows for future phases of the project to revisit significance determinations when determining whether mitigation will be required. The comment equates this to essentially using the County's past Tier II threshold of significance, which was no longer used as a threshold of significance in the FEIR. As a result, the comment argues that the County has avoided its obligation to make a significance determination before it approves the project. Mitigation Measure 12-2 requires that any subdivision maps submitted under the project (i.e. before and after 2020) be required to reduce, to the extent necessary and feasible, GHG emissions such that the project operates within the targets or adopted plan established at the time the map is submitted for approval. This means that every subdivision map submitted for approval will require further scrutiny and analysis and will need to demonstrate whether that portion of the project will exceed applicable operational thresholds. Mitigation Measure 12-2 outlines a number of potential actions that the project could take to meet applicable thresholds and requires that each action chosen be calculated for GHG reduction potential. This list of potential actions is not intended to be limited or all-inclusive and may be supplemented with other measures such as actions that may not be technologically feasible at present but may be feasible at the time

of a future subdivision map submittal, as well as measures recommended in this comment. As long as the project demonstrates that future subdivision maps would comply with applicable GHG thresholds, other actions may be proposed at the time such maps are proposed. Finally, the FEIR includes the provision for carbon offsets in the event that the GHG thresholds cannot otherwise be met through onsite mitigation. This offset requirement assures that, even if sufficient reductions are not feasible within the project (and no information suggests this at this time), that the applicant will still be required to reduce GHG impacts to levels below established targets. Changes in significance determination would not occur.

AG-14 The comment suggests that the EIR does not consider all feasible mitigation measures. The comment suggests that the overall goal of the 2013 Sustainable Communities Strategy, a 16 percent reduction in per capita GHG emissions by 2035 for the entire six-county SACOG region, should have been a recommended mitigation measure in the EIR. This is not an accurate representation of the discussion in the EIR.

- First, the FEIR states that because the project site was not included in the SCS, its GHG emissions would be additional to GHG emissions projected in the SACOG region in 2035; this is one of the factors that resulted in the conclusion that GHG emissions from the project would be significant. See response to comment IO41-59 of the Final EIR.

- Second, the comment states that the County is obligated to meet the 16 percent per capita GHG vehicle emissions reduction in 2035 in order to meet SCS targets from the 2013 plan, but does not cite where the plan requires this. Further, the comment suggests that this per capita reduction should apply to the project. This is an inaccurate portrayal of the SCS. The SCS covers the entire SACOG region, which includes the counties of Sacramento, Yolo, Yuba, Sutter, Placer and El Dorado (including 22 cities), but excluding the Tahoe Basin. The 16 percent per capita reduction in vehicle related GHG is a target of the entire SACOG region and it is based on the mix of land uses applied to the entire SACOG region covered by the SCS. If the 16 percent goal is achieved region wide, the region will have met its goal, linked to statewide GHG emission targets, for automobile/light truck-related GHG emissions for 2035. Keeping in mind that this reduction is a cumulative reduction for the entire SACOG region, some land uses and locations would exceed the target, some would be under the target, but the requirement is that the mix of land uses, taken together, would reduce overall GHG emissions by 16 percent per capita. Isolating one project, as suggested by the comment, and stating that it must achieve this target is an inappropriate and inapplicable approach toward consideration of the project in the overall regional mix of land uses. Otherwise, land use agencies would require GHG reduction in some projects, such as rural development, where it would be difficult to achieve, but could (by this same token) relax standards in urban areas where greater than 16 percent reductions are achievable. In other words, the SCS only works by combining residential, commercial, recreational, office, and other land uses together, in a variety of locations and combinations.

The comment then outlines a number of mitigation measures used in other planning documents, a number of which are similar to those proposed in Mitigation Measure 12-2 (e.g., requiring that all buildings exceed Title 24 energy-efficiency requirements by 15 percent, enacting design features that reduce building energy requirements) and/or in the MVWPSP. Mitigation Measure 11-1a in the Air Quality Section also limits idling time and imposes other construction-related measures to reduce impacts. Other measures, such as setting mandatory minimum waste diversion requirements, cannot feasibly be implemented on a project level and are more appropriate for the County to consider on a larger scale. Furthermore, the list of potential actions listed in Mitigation Measure 12-2 is not intended to be limited or all-inclusive and may be supplemented with other measures such as actions

that may not be technologically feasible at present but may be feasible at the time of a future subdivision map submittal, as well as measures recommended in this comment. As long as the project demonstrates that future subdivision maps would comply with applicable GHG thresholds, other actions may be proposed at the time such maps are proposed. Finally, the FEIR includes the provision for carbon offsets in the event that the GHG thresholds cannot otherwise be met through onsite mitigation. This offset requirement assures that, even if sufficient reductions are not feasible within the project (and no information suggests this at this time), that the applicant will still be required to reduce GHG impacts to levels below established targets.

AG-15 The comment suggests the EIR should be recirculated. The comment does not raise any new significant impacts, nor alter conclusions with respect to the severity of any identified significant effects. Recirculation is not warranted for the same reasons described in Master Response 1 of the Final EIR.

REFERENCES

CARB 2016. Website-Timeline of AB 32 Scoping Plan Activities. https://www.arb.ca.gov/cc/scopingplan/timeline.htm

Alexander Fisch, Supervising Environmental Planner, Placer County. Telephone conversation with Gary Jakobs, August 31, 2016

Lahontan Water Board. 2016. Lake Tahoe TMDL Program. Available: https://www.enviroaccounting.com/TahoeTMDL/Program/Display/LakeTahoeTMDL. Accessed on June 23, 2016.

Placer County Department of Public Works. 2013 (March). County of Placer Lake Tahoe Pollutant Load Reduction Plan. Prepared for Lahontan Regional Water Quality Control Board. Available: http://www.swrcb.ca.gov/lahontan/water_issues/programs/tmdl/lake_tahoe/docs/placer_plrp.pdf. Accessed on June 23, 2016.

Placer County. 2016a. Village at Squaw Valley Specific Plan EIR, Placer County, 2016. pp 3-25.

Placer County. 2016b. Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project Draft EIR/EIS (June 2016). Placer County and Tahoe Regional Planning Agency, SCH 2014072039

TRPA 2011. Threshold Evaluation Report, Air Quality. http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch3_Air-Quality_Oct2012_Final.pdf

TRPA 2012. Lake Tahoe Regional Plan Update Draft Environmental Impact Statement. pp 3.8-30. http://www.trpa.org/wp-content/uploads/3.8_Hydrology__WQ.pdf

TMPO/TRPA 2012. Lake Tahoe Regional Transportation Plan and Sustainable Communities Strategy Draft Environmental Impact Report Draft Environmental Impact Statement California SCH# 2011082070 Nevada SCH# E2012-033. Hydrology and Water Quality Chapter 3.8. http://tahoempo.org/rtp_draft/1_Regional_Transportation_Plan_EIS/3.8_Hydrology_WQ_RTP.pdf

USEPA May 1999: Emission Facts, The History of Reducing Tailpipe Emissions. https://www3.epa.gov/otaq/consumer/f99017.pdf

EXHIBIT B

4 MITIGATION MONITORING AND REPORTING PROGRAM

The following Mitigation Monitoring and Reporting Program (MMRP) was prepared in compliance with the requirements of California Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. This MMRP identifies specific timing and monitoring requirements for implementation of all mitigation measures identified in the EIR for the Martis Valley West Parcel Specific Plan (MVWPSP).

4.1 STANDARD MITIGATION MONITORING PROGRAM

Placer County has adopted a standard mitigation monitoring program (Section 18.28.030 of the Placer County Environmental Review Ordinance) to implement PRC Section 21081.6. This program requires that mitigation measures recommended for discretionary projects, such as the MVWPSP, be included in the conditions of approval monitored by the County through a variety of permit processes, as listed below.

- Development Review Committee
- Improvement Plan Approval
- Construction Inspection
- Encroachment Permit
- Final Map Recordation
- Acceptance of Project as Complete
- Building Permit Approval

4.1.1 MMRP and Required Approvals and Permits/Format of Table

The issuance of any of the listed permits and County actions must be preceded by verification by County staff that certain conditions of approval/mitigation measures have been met. This verification shall serve as the required monitoring for those conditions of approval/mitigation measures. All of the mitigation measures for the MVWPSP included in the EIR would be monitored through the County's Standard Mitigation Monitoring Program (Table 23-1). Some mitigation measures require ongoing implementation and would require monitoring even after a Final Map is recorded, a Certificate of Occupancy is issued, or other discretionary permit is vested or ministerial permit is accepted as complete. Table 23-1 also identifies the mitigation measures that require ongoing implementation, the party(ies) responsible for funding implementation, the necessary timing of implementation that would occur outside the scope of the County's Standard Mitigation Monitoring Program, and the mechanisms for monitoring compliance with each mitigation measure.

Table 23-1 is organized as follows: if an EIR topic, such as biological resources, includes mitigation measures, it is included in the MMRP table. The EIR chapter number of the relevant section (i.e., Chapter 7 for Biological Resources) is also included. The same numbering system for mitigation measures (Mitigation Measure 7-2a, 7-2b, 7-3, etc.) is carried over from the EIR discussion into the table. If an issue addressed in the EIR does not result in mitigation, it is not included in the table.

This page intentionally left blank.

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
7 Biological Resources			
Mitigation Measure 7-2a: Conduct delineation of waters of the United States and obtain authorization for fill and required permits A preliminary wetland delineation was completed in June and October 2014 for the entire West Parcel (Ascent Environmental 2015) and the entire East Parcel; however, verification of the preliminary delineation by USACE has not occurred prior to the preparation of the Draft EIR. Potential wetlands and other waters of the U.S. within the offsite utilities corridor have not been delineated prior to the preparation of the Draft EIR. The following would apply, as applicable, to any potentially affected jurisdictional resources that have not been delineated or verified by USACE before project implementation, including areas that would be affected by the offsite utilities facilities. Before Improvement Plan approval for the start of onsite construction activities on any potentially affected jurisdictional resource that has not been previously delineated or verified by the USACE, a qualified biologist shall survey the project site for sensitive natural communities. Sensitive natural communities or habitats are those of special concern to resource agencies or those that are afforded specific consideration, based on Section 404 of the CWA and other applicable regulations. If sensitive natural communities or habitats that are afforded specific consideration, based on Section 404 of the CWA are determined to be present, a delineation of waters of the United States, including wetlands that would be affected by the project, will be prepared by a qualified biologist through the formal Section 404 wetland delineation process. The delineation will be submitted to and verified by USACE. If, based on the verified delineation, it is determined that fill of waters of the United States would result from implementation of the project, authorization for such fill will be secured from USACE through the Section 404 permitting process. The acreage of riparian habitat (deciduous riparian vegetation) that would be removed or disturbed during project implementation will be quantified and replaced or restored/enhanced to meet the no-net-loss standard in accordance with USACE requirements. Habitat restoration, enhancement, and/or replacement will be at a location and by methods agreeable to USACE as determined during the permitting processes for CWA Section 404.	Placer County Planning Services Division	Prior to Improvement Plan approval and the start of construction activities on any potentially affected jurisdictional resource that has not been previously delineated or verified by USACE	Completion prior to the start of construction activities on any potentially affected jurisdictional resource that has not been previously delineated or verified by USACE
Mitigation Measure 7-2b: Obtain and comply with a lake and streambed alteration agreement; compensate for unavoidable loss of stream and riparian habitat The following measures shall be implemented to avoid or compensate for the loss or degradation of stream or riparian habitat, ensure consistency with Fish and Game Code Section 1602, and further reduce potential adverse effects on riparian habitats: ◢ The project developer shall notify CDFW before commencing any activity within the bed, bank, or riparian corridor of any waterway. If activities trigger the need for a Streambed Alteration Agreement, the proponent will obtain an agreement from CDFW before Improvement Plan approval. The project proponent shall conduct construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect the fish and wildlife resources, when working within the bed or bank of waterways that function as a fish or wildlife resource or in riparian habitats associated with those waterways. ◢ The project developer shall compensate for permanent loss of riparian habitat at a minimum of a 1:1 ratio through contributions to a CDFW approved wetland mitigation bank or through the development and implementation of a Compensatory Stream and Riparian Mitigation and Monitoring Plan for creating or restoring in-kind habitat in the surrounding area. If mitigation credits are not available, stream and riparian habitat compensation shall include establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of existing riparian	Placer County Planning Services Division	Prior to Improvement Plan approval and before commencing any activity within the bed, bank, or riparian corridor of any waterway	Completion prior to commencing any activity within the bed, bank, or riparian corridor of any waterway Monitor compensatory habitat for a minimum of 5 years from completion of mitigation or human intervention, or until the success criteria have been met

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the existing riparian corridor along streams in the project site and surrounding areas. Construction activities and compensatory mitigation shall be conducted in accordance with the terms of a streambed alteration agreement as required under Section 1602 of the Fish and Game Code. ◢ The Compensatory Stream and Riparian Mitigation and Monitoring Plan shall include the following: ◤ identification of compensatory mitigation sites and criteria for selecting these mitigation sites; ◤ in kind reference habitats for comparison with compensatory riparian habitats (using performance and success criteria) to document success; ◤ monitoring protocol, including schedule and annual report requirements (Compensatory habitat shall be monitored for a minimum of 5 years from completion of mitigation, or human intervention (including recontouring and grading), or until the success criteria identified in the approved mitigation plan have been met, whichever is longer.); ◤ ecological performance standards, based on the best available science and including specifications for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80% survival of planted riparian trees and shrubs by the end of the five-year maintenance and monitoring period or dead and dying trees shall be replaced and monitoring continued until 80 percent survivorship is achieved; ◤ corrective measures if performance standards are not met; ◤ responsible parties for monitoring and preparing reports; and ◤ responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions.			
Mitigation Measure 7-3: Avoid, minimize, and compensate for effects on special-status plants The project developer shall implement the following measures to reduce potential impacts on special-status plants: ◢ Before commencement of any project construction for each phase of construction and during the blooming period for the special-status plant species with potential to occur on the project site, a qualified botanist shall conduct protocol-level surveys for special-status plants in areas where potentially suitable habitat would be removed or disturbed by project activities. ◢ If no special-status plants are found, the botanist shall document the findings in a letter report to Placer County and CDFW and no further mitigation will be required. ◢ If special-status plant species are found that cannot be avoided during construction, the project applicant shall consult with CDFW, as appropriate depending on species status, to determine the appropriate mitigation measures for direct and indirect impacts that could occur as a result of project construction and will implement the agreed-upon mitigation measures to achieve no net loss of occupied habitat or individuals. Mitigation measures may include, but are not limited to, preserving and enhancing existing populations, creating offsite populations on project mitigation sites through seed collection or transplantation, and/or restoring or creating suitable habitat in sufficient quantities to achieve no net loss of occupied	Placer County Planning Services Division	Prior to commencement of any project construction, grading, or vegetation removal for each phase of construction and during the blooming period for the special-status plant species with potential to occur onsite	Completion prior to commencing construction, grading, or vegetation removal for each phase of construction in areas of special-status plant habitat Monitor compensatory habitat until the success criteria have been met

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
habitat and/or individuals. Potential mitigation sites could include suitable locations within or outside of the project area. A mitigation and monitoring plan shall be developed describing how unavoidable losses of special-status plants will be compensated. ◢ If relocation efforts are part of the mitigation plan, the plan shall include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. ◢ Success criteria for preserved and compensatory populations shall include: ◤ The extent of occupied area and plant density (number of plants per unit area) in compensatory populations will be equal to or greater than the affected occupied habitat. ◤ Compensatory and preserved populations will be self-producing. Populations will be considered self-producing when: – plants reestablish annually for a minimum of five years with no human intervention such as supplemental seeding; and – reestablished and preserved habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types in the project vicinity. ◤ If offsite mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations.			
Mitigation Measure 7-4: Implement invasive plant management practices during project construction The project developer shall implement the following invasive plant management practices during project construction. ◢ A qualified biologist will conduct a preconstruction survey to determine whether any populations of invasive plants are present within areas proposed for ground-disturbing activities. This could be conducted in coordination with the focused special-status plant survey recommended above under Mitigation Measure 7-3. ◢ Before construction activities begin, invasive plant infestations will be treated where feasible. Treatments will be selected based on each species ecology and phenology. Control measures may include herbicide application, hand removal, or other means of mechanical control. This would help eliminate the threat of spreading the species throughout the project site and adjacent areas. All treatment methods-including the use of herbicides-will be conducted in accordance with the law, regulations, and policies governing the land owner. In areas where treatment is not feasible, noxious weed areas will be clearly flagged or fenced to clearly delineate work exclusion. Treatments will be implemented by a qualified biologist or other qualified specialist approved by Placer County.	Placer County Planning Services Division	Prior to any construction or grading	Treat invasive plant infestations prior to commencing construction or grading
◢ Vehicles and equipment will arrive at the project area clean and weed-free. All equipment entering the project site from weed-infested areas or areas of unknown weed status will be cleaned of all attached soil or plant parts before being allowed into the project site. Vehicles and equipment will be cleaned using high-pressure water or air at designated weed-cleaning	Placer County Planning Services	At start of construction for each	Ongoing during construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
stations after exiting a weed-infested area. Cleaning stations will be designated by a botanist or noxious weed specialist and located away from aquatic resources. ◢ To ensure that fill material and seeds imported to the study area are free of invasive/noxious weeds, the project will use onsite sources of fill and seeds whenever available. Fill and seed materials that need to be imported to the study area will be certified weed-free. In addition, only certified weed-free imported materials (or rice straw in upland areas) will be used for erosion control. ◢ If designated weed-infested areas are unavoidable, the plants will be cut, if feasible, and disposed of in a landfill in sealed bags or disposed of or destroyed in another manner acceptable to Placer County or other agency as appropriate. If cutting weeds is not feasible, layers of mulch, degradable geotextiles, or similar materials will be placed over the infestation area to minimize the spread of seeds and plant materials by equipment and vehicles during construction. These materials will be secured so they are not blown or washed away. ◢ Locally collected native seed sources for revegetation shall be used when possible. Plant and seed material will be collected from or near the study area, from within the same watershed, and at a similar elevation when possible and with approval of the appropriate authority (e.g., USFS botanist for collection on USFS land).	Division	construction season	
◢ After construction is completed for each project phase, the affected project site shall be monitored on an annual basis for infestations of invasive weeds until the restored vegetation has become fully established. If new populations of invasive weeds are documented during monitoring, they will be treated and eradicated to prevent further spread. Monitoring by a qualified biologist shall occur for up to three years (as feasible) subsequent to project implementation.	Placer County Planning Services Division	After each phase of project construction	Annually for up to three years during operations until restored vegetation is established
Mitigation Measure 7-5a: Conduct preconstruction surveys for nesting special-status birds, and implement a limited operating period if necessary For construction activities that would occur in suitable habitat during the nesting season (generally April 1–August 31, depending on species, snowpack, and other seasonal conditions), a qualified wildlife biologist shall conduct focused surveys for yellow warbler, olive-sided flycatcher, and long-eared owl nests no more than 14 days before construction activities are initiated each construction season. The preconstruction survey for active nests will be conducted using a nest-searching technique appropriate for the species, as determined by a qualified biologist. For example, for yellow warbler, an appropriate technique involves first conducting point counts in suitable riparian habitat to determine occupancy, followed by nest searching if the species is present. For long-eared owl, surveys typically involve tape playbacks of recorded long-eared owl calls. If an active nest is located during the preconstruction surveys, the biologist shall notify CDFW. If necessary, modifications to the project design to avoid removal of occupied habitat shall be evaluated and implemented, to the extent feasible. If avoidance is not feasible, appropriate buffers around nests and limited operating periods shall be established through consultation with CDFW to avoid disturbances during the sensitive nesting season.	Placer County Planning Services Division	No more than 14 days before construction activities are initiated each construction season	For each affected species, no more than 14 days before construction activities are initiated each construction season

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 7-5b: Conduct pre-construction surveys for special-status bats, avoid removal of important roosts, and implement a limited operating period if necessary Bat surveys shall be conducted by a qualified wildlife biologist within 14 days before any tree removal or clearing during each construction season. Locations of vegetation and tree removal or excavation will be examined for potential bat roosts. Specific survey methodologies will be determined in coordination with CDFW, and may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g., Sonobat, Anabat). Removal of any significant roost sites located will be avoided to the extent feasible. If it is determined that an active roost site cannot be avoided and will be affected, bats will be excluded from the roost site before the site is removed. The biologist shall first notify and consult with CDFW on appropriate bat exclusion methods and roost removal procedures. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not reenter), or sealing roost entrances when the site can be confirmed to contain no bats. Once it is confirmed that all bats have left the roost, crews will be allowed to continue work in the area. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during winter hibernation or while females in maternity colonies are nursing young [generally, during late spring and summer]). If a hibernation or maternity roosting site is discovered, the project developer will consult with CDFW to establish appropriate exclusionary buffers until all young are determined to be volant (i.e., able to fly) by a qualified biologist. Once it is determined that all young are volant, passive exclusion devices will be installed and all bats will be allowed to leave voluntarily. Once it is determined by a qualified biologist that all bats have left the roost, crews will be allowed to work within the buffer zone.	Placer County Planning Services Division	No more than 14 days before any tree removal is initiated during each construction season	For each affected species, prior to the start of each construction season in locations that could provide roosting habitat
Mitigation Measure 7-5c: Conduct pre-construction surveys for Sierra Nevada mountain beaver and implement a limited operating period, if necessary A qualified biologist shall conduct focused surveys for the presence/absence of active burrows for Sierra Nevada mountain beaver in suitable riparian habitat within proposed impact areas and a 250-foot buffer (if feasible). The preconstruction survey for active burrows shall be conducted no more than 30 days before construction activities are initiated each construction season. Placer County shall be notified of the results of the preconstruction surveys. If active breeding/burrow sites are identified within 250 feet of project activities, the project applicant shall implement limited operating periods (LOP) for all such burrows before commencement of any project construction activities to avoid construction or access-related disturbances to breeding activities of Sierra Nevada mountain beaver. An LOP constitutes a period during which project-related activities (i.e., vegetation removal, earth moving, and construction) will not occur, and will be imposed between February 1 and July 31 within 250 feet of any active burrow sites. The period of the LOP, area within which it is implemented (e.g., 250-foot buffer), and activities allowed or prohibited within the LOP may be adjusted through consultation with CDFW and/or Placer County. Placer County shall be notified of the establishment of buffers and LOPs required to minimize or avoid impacts to Sierra Nevada mountain beaver.	Placer County Planning Services Division	No more than 30 days before construction activities are initiated each construction season	No more than 30 days before construction activities are initiated each construction season

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
8 Cultural Resources			
Mitigation Measure 8-2a: Complete and implement subsequent evaluation recommendations prior to ground disturbing activities ◢ **Phase 2 Evaluation Report:** Prior to the application for each small lot tentative map or conditional use permit, or approval of offsite infrastructure alignments, and prior to improvement plan approval, a Phase 2 Evaluation Report shall be prepared for the archaeological resources within the area subject to the application and identified in the Martis Valley West Parcel Phase 1B: Heritage Resources Preliminary Field Inventory Report and the Martis Valley West Parcel Specific Plan Offsite Utilities Connection and Fire road Heritage Resource Inventory Phase 1A and Phase 1B Preliminary Report. In the Phase 2 Evaluation Report, resources will be evaluated and recorded on standard Department of Parks and Recreation (DPR) Primary Record forms (Form DPR 523) in accordance with one or more national, state and/or regional criteria and a determination of eligibility/ineligibility to the NRHP and/or CRHR and/or local register will be recommended. The Phase 2 Evaluation Report shall be completed by a qualified archaeologist who meets the Secretary of the Interior's professional qualifications for archaeology and submitted to the Placer County Planning Services Division with the first submittal of improvement plans. ◢ **Phase 3 Evaluation Report:** If significant archaeological resources are identified in the Phase 2 Evaluation Report, an assessment of project impacts on these resources will be included in a Phase 3 Evaluation Report, as well as detailed measures to avoid impacts. Avoidance measures could include, but are not limited to, actions such as re-routing of the sewer line around the resources, directional drilling under the resource, site testing to confirm the boundary of a significant resource and avoidance of that boundary, and construction monitoring in sensitive areas to prevent disturbance of currently unknown subsurface resources. Adopted avoidance measures will be implemented as appropriate during project design and construction. If project redesign to completely avoid impacts is infeasible, then measures will be developed and implemented in coordination with Placer County Planning Services Division and appropriate Native American representatives to recover the significant information contained within these archaeological resources before the resource site is disturbed. Testing or data recovery shall be the preferred method of dealing with the affected resources. The Phase 3 Evaluation Report and any data recovery (if needed) shall be completed by a qualified archaeologist who meets the Secretary of the Interior's professional qualifications for archaeology. Mitigation or data recovery typically involves additional archival research, field excavation, photo documentation, mapping, and/or archaeological monitoring. If a Phase 3 Evaluation Report is needed, it will be submitted to the Placer County Planning Services Division concurrent with the submittal of improvement plans. Any avoidance and data recovery measures shall be developed in consultation with the archeologist and finalized in consultation with the Placer County Planning Services Division to confirm the effectiveness of the measures.	Placer County Planning Services Division	Phase 2: Prior to approval of small lot tentative map or conditional use permit; or improvement plan approval (with no entitlement) Phase 3: Prior to improvement plan approval	Completion with submittal of the first application for County construction permits or Improvement Plans
Mitigation Measure 8-2b: Develop and implement a Worker Environmental Awareness Program Prior to improvement plan approval, the project applicant shall design and implement a Worker Environmental Awareness Program (WEAP) that shall be provided to all construction personnel and supervisors who will have the potential to encounter and alter heritage and cultural resources. The WEAP shall be submitted to the Planning Services Division and shall describe, at a minimum: ◢ types of heritage and cultural resources expected in the project area; ◢ types of evidence that indicate heritage or cultural resources might be present (e.g., ceramic shards, trash scatters, lithic scatters, mineralized, partially mineralized, or unmineralized bones and teeth, soft tissues, shells, wood, leaf impressions,	Placer County Planning Services Division	Before commencement of earth-disturbing activities	Continuously during construction-related earth-moving activities

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
footprints); ◢ what to do if a worker encounters a possible resource; ◢ what to do if a worker encounters bones or possible bones; and ◢ penalties for removing or intentionally disturbing heritage and cultural resources, such as those identified in the Archeological Resources Protection Act.			
Mitigation Measure 8-2c: Stop work, in the event of an archaeological discovery In the event that evidence of any paleontological, prehistoric or historic-era subsurface archaeological features or deposits are discovered during construction-related earth-moving activities (e.g., ceramic shard, trash scatters, lithic scatters, mineralized, partially mineralized, or unmineralized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. The Placer County Planning Services Division and the Department of Museums will be notified of the potential find and a qualified archeologist shall be retained to investigate. If the find is an archeological site, the appropriate Native American group shall be notified. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, the Planning Services Division shall be notified and a data recovery plan shall be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the project applicant to avoid disturbance to the resources, and if complete avoidance is not feasible in light of project design, economics, logistics, and other factors, follow accepted professional standards in recording any find including submittal of the standard DPR Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area (the NCIC).	Placer County Planning Services Division and the Department of Museums	During construction-related earth-moving activities	Continuously during construction-related earth-moving activities
Mitigation Measure 8-3: Stop work, if human remains are discovered California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Sections 7050.5 and 7052 and California Public Resources Code Section 5097. If human remains are discovered during any demolition or construction activities, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the project applicant shall notify the Placer County Coroner and the NAHC immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant (MLD), if any, identified by the NAHC. Following the coroner's findings, the archaeologist, and the NAHC-designated MLD shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California Public Resources Code Section 5097.94.	Placer County Planning Services Division	During any earth-moving activities	Continuously during any earth-moving activities

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
10 Transportation and Circulation			
Mitigation Measure 10-1a: Optimize signal timing at the SR 267/I-80 WB ramps intersection Prior to the Improvement Plan approval for the initial phase, the project applicant shall coordinate with Caltrans to optimize the traffic signal operation at the SR 267/I-80 WB Ramps intersection. Evidence shall be provided to the satisfaction of the Placer County Engineering and Surveying Division and Placer County Department of Public Works that the optimization will be implemented by Caltrans as warranted, or that a good faith effort has been made by the applicant to coordinate with Caltrans.	Placer County Department of Public Works, ESD and Caltrans	Prior to the Improvement Plan approval for the initial phase, subject to Caltrans approval and conditions	Prior to the Improvement Plan approval for the initial phase, subject to Caltrans approval and conditions
Mitigation Measure 10-1b: Optimize signal timing at the SR 267/Schaffer Mill Road/Truckee Airport Road intersection Prior to the Improvement Plan approval for the initial phase, the applicant shall coordinate with Caltrans to optimize the traffic signal operation at the SR 267/Schaffer Mill Road/Truckee Airport Road intersection. Evidence shall be provided to the satisfaction of the Placer County Engineering and Surveying Division and Placer County Department of Public Works that the optimization will be implemented by Caltrans as warranted, or that a good faith effort has been made by the applicant to coordinate with Caltrans.	Placer County Department of Public Works, ESD and Caltrans	Prior to the Improvement Plan approval for the initial phase, subject to Caltrans approval and conditions	Prior to the Improvement Plan approval for the initial phase, subject to Caltrans approval and conditions
Mitigation Measure 10-1c: Provide signage on Highlands View Road for motorists to access SR 267 NB via Ridgeline Drive and Northstar Drive The Improvement Plans for the first development of residential units of the MVWPSP shall show the construction and installation of a message sign on Highlands View Road. The sign shall be located at a sufficient distance from the Ridgeline Drive intersection to alert motorists that access to northbound SR 267 is via Ridgeline Drive (left from Highlands View Road) and Northstar Drive (right from Ridgeline Drive), so as to access the traffic signal at the SR 267/Northstar Drive intersection. The message sign and its use during the winter peak traffic conditions shall be required in perpetuity.	Placer County Department of Public Works, ESD and Caltrans	Prior to the Improvement Plan approval for the initial phase, subject to Caltrans approval and conditions	Prior to the Improvement Plan approval for the initial phase, subject to Caltrans approval and conditions
Mitigation Measure 10-2: Pay impact fee to Placer County for future roadway improvements to State Route 267 Prior to issuance of any building permits for each commercial or residential lot, the project shall be subject to the payment of traffic impact fees in effect for the Tahoe District, pursuant to applicable ordinances and resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required and shall be paid to the Placer County Department of Public Works: ◢ Countywide Traffic Limitation Zone: Article 15.28.010, Placer County Code The current total combined estimated fee for the entire project is $3,685,511.42 ($4,846 per single family residential unit). The fees were calculated using the information supplied. If the use or the square footage changes, then the fees will change. The actual fees paid shall be those in effect at the time the payment occurs.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits
Mitigation Measure 10-5a: Payment of annual transit fees Prior to recordation of the initial Small Lot Final Map, the applicant shall establish a new Zone of Benefit (ZOB) within an existing County Service Area (CSA) or annex into a pre-existing ZOB to provide adequate funding of capital and ongoing operational transit services/requirements. The applicant shall submit to the County for review and approval a complete and adequate engineer's report	Placer County Department of Public Works	Prior to recordation of the initial Small Lot Final Map	Prior to recordation of the initial Small Lot Final Map

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
supporting the level of assessments necessary for the establishment of the ZOB. The report shall be prepared by a registered engineer in consultation with a qualified financial consultant and shall establish the basis for the special benefit appurtenant to the project.			
Mitigation Measure 10-5b: Join and maintain membership in the Truckee-North Tahoe Transportation Management Association Prior to Improvement Plan approval and/or recordation of the Final Map, the commercial and homeowner associations shall join and maintain membership (at the rate defined by the TNT/TMA and tied to improvements to be funded) in perpetuity in the Truckee-North Tahoe Transportation Management Association (TNT/TMA), whose established purpose is to improve the general traffic and transportation conditions in the Truckee/North Tahoe area, and to address situations associated with traffic congestion and transportation systems.	Placer County Department of Public Works, ESD	Prior to Improvement Plan approval and/or recordation of the Final Map	Prior to Improvement Plan approval and/or recordation of the Final Map
Mitigation Measure 10-6: Develop and implement a construction traffic management plan Prior to Improvement Plan approval, the project applicant shall develop and submit for review and approval a construction traffic management plan (TMP) to the satisfaction of the Placer County Department of Public Works and Caltrans. The plan shall include (but not be limited to) items such as: ◢ guidance on the number and size of trucks per day entering and leaving the West Parcel development area; ◢ identification of arrival/departure times that would minimize traffic impacts; ◢ locations of staging areas; ◢ locations of employee parking and methods to encourage carpooling and use of alternative transportation; ◢ criteria for use of flaggers and other traffic controls; ◢ preservation of safe and convenient passage for bicyclists and pedestrians through/around construction areas; ◢ monitoring for roadbed damage and timing for completing repairs; ◢ limitations on construction activity during peak/holiday weekends and special events; ◢ preservation of emergency vehicle access; ◢ removing traffic obstructions during emergency evacuation events; and ◢ providing a point of contact for Martis Valley residents and guests to obtain construction information, have questions answered, and convey complaints.	Placer County Department of Public Works and the Engineering and Surveying Division Caltrans	Prior to Improvement Plan approval	Continuously during project construction
Cumulative Mitigation Measure 10-8a: Pay Placer County fee for future roadway improvements, including the SR 267/I-80 WB Ramps intersection Implement Mitigation Measure 10-2. The Town of Truckee TIF Program identifies the construction of a two-lane roundabout at this location. This improvement would reduce the traffic impact to a less-than-significant level during both the summer and winter peak hour under cumulative-plus-project conditions.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits
Cumulative Mitigation Measure 10-8b: Pay Placer County fee for future roadway improvements, including the SR 267/I-80 EB Ramps intersection Implement Mitigation Measure 10-2. The Truckee TIF Program identifies the construction of a two-lane roundabout at this location. This improvement would reduce the traffic impact to a less-than-significant level during the winter peak hour under cumulative-plus-project conditions.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Cumulative Mitigation Measure 10-8c: Pay Placer County fee for future roadway improvements, including the SR 267/Brockway Road/Soaring Way intersection Implement Mitigation Measure 10-2. The Truckee TIF Program identifies the construction of a roundabout or equivalent improvements at this intersection. The TIF Program also includes the widening of SR 267 on both sides of this intersection, which would essentially result in a two-lane roundabout at this intersection. This improvement would reduce the traffic impact to a less-than-significant level during the summer and winter peak hour under cumulative-plus-project conditions.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits
Cumulative Mitigation Measure 10-8d: Pay Placer County fee for future roadway improvements, including the SR 267/Schaffer Mill Road/Truckee Airport Road intersection Implement Mitigation Measure 10-2. The Placer County CIP identifies improvements to this intersection as well as the widening of SR 267 to four lanes on both sides of this intersection. The widening of this intersection with either signalization or the construction of a two-lane roundabout would reduce the traffic impact to a less-than-significant level during the summer and winter peak hours under cumulative-plus-project conditions.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits
Cumulative Mitigation Measure 10-8e: Provide signage on Highlands View Road and pay Placer County fee for future roadway improvements Implement Mitigation Measures 10-1c and 10-2. The Placer County CIP includes the widening of SR 267 to four lanes on both sides of this intersection. The widening of this intersection, along with the project-specific mitigation of providing signage on Highlands View Road for motorists to access SR 267 northbound via Ridgeline Drive and Northstar Drive, would reduce the impact to a less-than-significant level during the summer and winter peak hours under cumulative-plus-project conditions.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits
Cumulative Mitigation Measure 10-8f: Pay Placer County fee for future roadway improvements, including the SR 267/Project Access Road intersection Implement Mitigation Measure 10-2. The Placer County CIP includes the widening of SR 267 to four lanes on both sides of this intersection. Although the widening of this intersection plus the installation of a traffic signal or two-lane roundabout would result in acceptable levels of service, Caltrans would not support either signalization or a roundabout because of the steep grade of SR 267 (over 4 percent) at this location and the resulting potential of rear-end collisions, especially in snowy conditions (Brake, pers. comm., 2015). Therefore, LOS F conditions would remain at this intersection during both the summer and winter peak hours.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits
Cumulative Mitigation Measure 10-9: Pay Placer County fee for future roadway improvements Implement Mitigation Measure 10-2. The widening of SR 267 to four lanes from Brockway Road to Brockway Summit would result in LOS D or better traffic operations on the study segments from Brockway Road to the Project Access Roadway during the summer and winter peak hours. As previously discussed, the widening of SR 267 to four lanes from Brockway Road to Brockway Summit is identified in both the Town of Truckee TIF Program and the Placer County CIP. The project would pay traffic impact fees that could be used for those portions of SR 267 located within Placer County. The Placer County CIP does not include widening of SR 267 from Brockway Summit to SR 28; therefore, there would be no feasible mitigation for the significant impact of the project on the roadway segment from the Project Access Roadway to SR 28.	Placer County Department of Public Works	Prior to issuance of building permits	Prior to issuance of building permits

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
11 Air Quality			
Mitigation Measure 11-1a: Reduce short-term construction-related NOX emissions The project applicant shall comply with the following measures onsite during construction activities to reduce emissions of NO_X: ◢ The prime construction contractor shall submit to PCAPCD a comprehensive inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower of greater) that would be used for 40 or more hours, in aggregate, during a construction season. If any new equipment is added after submission of the inventory, the prime contractor shall contact PCAPCD before the new equipment is used. At least three business days before the use of subject heavy-duty off-road equipment, the project representative shall provide PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and onsite foreman.	Placer County Planning Services Division and PCAPCD	At least three business days prior to the use of heavy-duty off-road equipment	Prior to each construction season
◢ Before approval of Grading or Improvement Plans, whichever occurs first, the applicant shall submit for PCAPCD approval, a written calculation demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average 20 percent reduction in NOX emissions as compared to ARB statewide fleet average emissions. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The calculation shall be provided using PCAPCD's Construction Mitigation Calculator.	Placer County Planning Services Division and PCAPCD	Prior to approval of Grading or Improvement Plans	Prior to each construction season
◢ During construction the contractor shall use existing power sources (e.g., power poles) or clean fuel (e.g., gasoline, biodiesel, natural gas) generators rather than temporary diesel power generators to the extent feasible. ◢ During construction, the contractor shall minimize idling time to a maximum of 5 minutes for all diesel powered equipment. ◢ Signs shall be posted in the designated queuing areas of the construction site to remind off-road equipment operators that idling is limited to a maximum of 5 minutes.	Placer County Planning Services Division and PCAPCD	During construction	Continuously during project construction
Mitigation Measure 11-1b: Participate in PCAPCD's Land Use Air Quality Mitigation Fund ◢ The applicant shall participate in PCAPCD's offsite mitigation program, the Land Use Air Quality Mitigation Fund, by paying the equivalent amount of fees for the project's contribution of NO_X that exceeds the 82 lbs/day threshold, or the equivalent as approved by PCAPCD. The applicable fee rates of the program change over time. The actual amount to be paid shall be determined, and satisfied per current guidelines, at the time of approval of the Grading or Improvement Plans.	Placer County Planning Services Division and PCAPCD	At time of approval of the Grading or Improvement Plans	Prior to each construction season
Mitigation Measure 11-1c: Submit Construction Emission/Dust Control Plan to PCAPCD Prior to approval of grading or improvement plans for subsequent phases of the MVWPSP, on project sites greater than one acre, the applicant shall submit a Construction Emission/Dust Control Plan to the Placer County Air Pollution Control District. Construction contractors shall not break ground prior to receiving District approval of the Construction Emission/Dust Control Plan, and delivering that approval to the County.	Placer County Planning Services Division and PCAPCD	Prior to approval of Grading Permit or Improvement Plans	Prior to Improvement Plan approval

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 11-6: Reduce long-term operation-related ROG and NO_X emissions ◢ Participate in the PCAPCD Offsite Mitigation Program by paying fees based on the project's contribution of pollutants (ROG and NO_X), as follows. The applicant shall pay $219 per residential unit to the PCAPCD's Offsite Mitigation Program (total fee due is $166,144) to offset 6.35 tons of ROG and 2.75 tons of NOX. The payment of the fee shall be apportioned based on the number of residential lots created per each small lot final map and shall be due prior to each final map approval.	Placer County Planning Services Division	Prior to each Final Map approval	Prior to each Final Plan approval
12 Greenhouse Gas Emissions and Climate Change			
Mitigation Measure 12-2: Implement ongoing operational greenhouse gas review and reduction program The state legislature or Governor's Office may establish new GHG targets or other programs or metrics that apply both before and after 2020, as discussed in the First Update to the Climate Change Scoping Plan, released by ARB in May 2014 (and discussed above in Section 12.2.2) and in response to CBD v CDFW as it relates to connecting Scoping Plan targets to individual projects. Any projects processed by the County will be required to reduce, to the extent needed and feasible, GHG emissions such that the project operates within the targets or adopted plans established at the time the project is submitted for approval, as explained below. The County shall require the following actions for all MVWPSP subdivision maps submitted for approval: ◢ In consultation with the PCAPCD and Placer County, the applicant shall demonstrate, based on currently adopted regulations and industry-accepted GHG calculation methods, whether operation of the project would be consistent with GHG targets adopted by the State. "Adopted" means that a specific GHG reduction target, such as that currently specified in the Global Warming Solutions Act of 2006 (achieve 1990 levels by 2020), is required by state legislative action, state administrative action, by legislative action of Placer County, or an applicable qualified Climate Action Plan or similar GHG reduction plan approved by Placer County. The target or plan shall be based on a substantiated linkage between the project (or Placer County projects in general if a countywide qualified GHG reduction plan is approved) and statewide GHG reduction goals. ◢ If the project achieves or exceeds the reduction target or plan, no further actions shall be required. ◢ If the project does not meet the target, then all feasible measures shall be incorporated into the project to reduce GHG emissions to the target or plan level and the extent feasible. Emissions reductions provided by these measures shall be calculated to determine if targets can be achieved. These measures may include any combination of GHG reduction actions needed to achieve the target, including: ◢ Actions specified in MVWPSP Section 7.9, "Air Quality & Climate Change" but with mandated actions (instead of "should" or "encourage" the actions, use "shall"). A project can choose from the options shown below as long as the overall target is met: ◤ Requiring that all buildings exceed Title 24 energy-efficiency requirements by 15 percent. ◤ All new residential buildings shall meet or exceed the guidelines for the California ENERGY STAR® Homes Program (Policy ER-AQ5). ◤ Selecting a building's orientation, massing and fenestration design to maximize effective day lighting to reduce building energy requirements, without increasing glare and/or electric lighting loads that off set glare is required. The selection	Placer County Planning Services Division and the PCAPCD	With all subdivision maps submitted for approval	With all subdivision maps submitted for approval

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
and extent of window glazing should vary, depending on the criteria required by the window's location, including solar heat gain, energy performance, day lighting, views and glare factors. Exterior sun controls (including porches, overhangs, trellises, balconies and shutters) shall be integrated into the building's fenestration design to effectively admit and block sun penetration as required (Policy ER-AQ6). ◤ Retain a Commissioning Agent (a professional qualified to evaluate and certify that a building is designed, constructed and functions in accordance with the building's specified operational requirements). Owners may choose to have the Commissioning Agent produce a re-commissioning manual for the building to assure it continues to meet established standards such as energy conservation and indoor air quality (Policy ER-AQ11). ◤ Efforts to reduce and recycle construction waste are required as well as regional procurement of construction materials when feasibly possible in order to reduce transport (Policy ER-AQ14). ◤ Installation of state-of-the-art energy efficient interior lighting (Policy ER-AQ17). ◤ Commercial retail buildings shall use automatic fixture sensors and low-consumption fixtures (Policy ER-AQ19). ◢ Payment of GHG offset fees to an ARB-approved GHG reduction program. Project applicant will consent to any GHG reduction fees that may be applicable after January 1, 2021.			
13 Noise			
Mitigation Measure 13-1: Implement construction-noise reduction measures To minimize noise levels during construction activities, construction contractors shall comply with the following measures during construction: ◢ All construction equipment and equipment staging areas shall be located as far as possible from nearby noise-sensitive land uses. ◢ All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation. ◢ When future noise-sensitive uses are within close proximity to noise-generating construction activity that will take place for more than three days, noise attenuating buffers such as structures, truck trailers, temporary noise curtains or sound walls, or soil piles shall be located between noise sources and the receptor to shield sensitive receptors from construction noise. The sound barrier, whatever the type, shall be tall enough to block the line of site between the noise sources and the affected receptors. ◢ At least one week before the beginning of each construction phase written notification of construction activities shall be provided to all noise-sensitive receptors located within 2,500 feet of construction activities. Additional notifications shall be provided if there are substantive changes in construction operations or noise generating activities (e.g., need for nighttime construction, special notice for blasting). Notification shall include anticipated dates and hours during which construction activities are anticipated to occur and contact information, including a daytime telephone number, for the project representative to be contacted in the event that noise levels are deemed excessive.	Placer County Planning Services Division	Before the beginning of each construction season	Continuously during project construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 13-3: Reduce noise exposure to future sensitive receptors from new stationary noise sources At the time of the permit application that includes any stationary sources of noise, the project applicant shall demonstrate that noise levels will meet applicable County standards at the nearest existing or planned sensitive receptor (e.g., residence). This may be done by providing the specifications of the noise source and/or a noise study to the County. In addition, the following measures shall be implemented to reduce the effect of noise levels generated by onsite stationary noise sources: ◢ Routine testing and preventive maintenance of emergency electrical generators shall be conducted during the less sensitive daytime hours (i.e., 7:00 a.m. to 10:00 p.m.), per the Placer County Noise Ordinance. All electrical generators shall be equipped with noise control (e.g., muffler) devices in accordance with manufacturers' specifications. ◢ External mechanical equipment, including HVAC units, associated with buildings shall incorporate features designed to reduce noise emissions below the stationary noise source criteria (i.e., 50 dB L_{dn} exterior / 45 dB L_{dn} interior, exterior daytime [7:00 a.m. to 10:00 p.m.] standards of 55 dB L_{eq}/ 70 dB L_{max} and the exterior nighttime [10:00 p.m. to 7:00 a.m.] standards of 45 dB L_{eq} / 65 dB L_{max}). These features may include, but are not limited to, locating equipment within equipment rooms or enclosures that incorporate noise reduction features, such as acoustical louvers, and exhaust and intake silencers. Equipment enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors.	Placer County Planning Services Division	During project operations	Continuously during project operations
◢ Loading docks shall be located and designed so that noise emissions do not exceed the stationary noise source criteria described in this analysis (i.e., 50 dB L_{dn} exterior / 45 dB L_{dn} interior, exterior daytime [7:00 a.m. to 10:00 p.m.] standards of 55 dB L_{eq}/ 70 dB L_{max} and the exterior nighttime [10:00 p.m. to 7:00 a.m.] standards of 45 dB L_{eq} / 65 dB L_{max}) at any existing or planned sensitive receptor. At the time of conformity review application submittal for discretionary entitlement, the project applicant shall provide to the County a specialized noise study to evaluate specific design and ensure compliance with Placer County noise standards. Reduction of loading dock noise can be achieved by locating loading docks as far away as possible from noise-sensitive land uses, constructing noise barriers between loading docks and noise-sensitive land uses, or using buildings and topographic features to provide acoustic shielding for noise-sensitive land uses. Final design, location, and orientation shall be dictated by findings in the noise study, if applicable.	Placer County Planning Services Division	At the time of conformity review application submittal for discretionary entitlement	Completion at the time of conformity review application submittal for discretionary entitlement
Mitigation Measure 13-4a: Reduce exterior noise levels at potential future sensitive receptors along SR 267 The following design measures shall apply to new sensitive receptors developed as part of the MVWPSP that would be located within 350 feet of the centerline of SR 267 (i.e., the distance from the centerline that is conservatively estimated, based on the noise modeling, to result in exceedance of the Placer County transportation-related exterior noise standard of 60 dBA L_{dn}) or the 60 dBA L_{dn} noise contour, whichever is greater: ◢ Orient new sensitive receptors such that outdoor activity areas (e.g., balcony, porch, backyard) are on the opposite side of the structure from SR 267, such that noise attenuation by the structure itself is sufficient to achieve the exterior noise standard; and/or ◢ Achieve, through building design and choice of building materials, a minimum, 20 dBA of exterior-to-interior noise attenuation, so that interior noise levels comply with the Placer County interior noise standard of 45 dBA L_{dn}. Or,	Placer County Planning Services Division	At the time of conformity review application submittal for discretionary entitlement	Completion at the time of conformity review application submittal for discretionary entitlement

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 13-4b: Demonstrate compliance with Placer County noise standards through refined noise analysis Alternatively, the project developer shall demonstrate to the satisfaction of Placer County, through refined, project specific modeling or other appropriate analysis, that interior and exterior noise levels at a given proposed residential site will meet Placer County noise standards. Such analysis shall consider then-current traffic levels, building design and orientation, and noise attenuating features, such as topography, intervening forest or other vegetation, and other noise barriers. The analysis shall be prepared by a qualified acoustic professional using methods approved by Placer County.	Placer County Planning Services Division	At the time of conformity review application submittal for discretionary entitlement	Completion at the time of conformity review application submittal for discretionary entitlement
14 Geology and Soils			
Mitigation Measure 14-3: Submit a geotechnical investigation for all areas of planned development The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Department (ESD) review and approval. The report shall address and make recommendations on the following: A) Road, pavement, and parking area design; B) Structural foundations, including retaining wall design (if applicable); C) Grading practices; D) Erosion/winterization; E) Special problems discovered onsite, (e.g., groundwater, expansive/unstable soils); and F) Slope stability. Once approved by the ESD, two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report. If the soils report indicates the presence of critically expansive or other soils problems that, if not corrected, could lead to structural defects, a certification of completion of the requirements of the soils report will be required for subdivisions, before issuance of Building Permits. This certification may be completed on a Lot by Lot basis or on a Tract basis. This requirement shall be so noted on the Improvement Plans, in the CC&Rs, in the Development Notebook, and on the Informational Sheet filed with the Final Subdivision Map(s).	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 14-4a: Prepare and implement a stormwater pollution prevention plan Implement Mitigation Measure 15-1. As a condition of the SWRCB Statewide Construction General Permit, the project applicant shall prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP will be prepared by a qualified SWPPP practitioner and/or a qualified SWPPP developer, will specify water quality controls consistent with Lahontan RWQCB requirements, and will ensure that runoff quality maintains beneficial uses of Middle Martis Creek. The site-specific SWPPP developed for each construction phase will describe the site controls, erosion and sediment controls, means of waste disposal, implementation of project specific plans required by local regulations, control of post-construction sediment and erosion control measures, and other impact reduction strategies unrelated to stormwater.	Lahontan RWQCB	Prior to any construction or grading for each construction phase	Ongoing during each construction phase

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 14-4b: Prepare and submit required plan materials to Placer County The project applicant shall prepare and submit Improvement Plans, specifications, and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. It is the project applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed before submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD before acceptance by the County of site improvements. Building Permits associated with this project shall not be issued until, at a minimum, the Improvement Plans are approved by ESD. Before the County's final acceptance of the project's improvements, submit to the ESD two copies of the Record Drawings in digital format (on compact disc or other acceptable media) in accordance with the latest version of the Placer County Digital Plan and Map Standards along with two blackline hardcopies (black print on bond paper) and two PDF copies. The digital format is to allow integration with Placer County's Geographic Information System (GIS). The final approved blackline hardcopy Record Drawings will be the official document of record."	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 14-4c: Identify ground disturbance areas and develop revegetation plan The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the ESD concurs with said recommendation. Fill slopes shall not exceed 1.5:1 (horizontal: vertical). The project applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Soil stockpiling or borrow areas shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the ESD. The project applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate for winterization and permanent erosion control work before Improvement Plan approval to guarantee protection against erosion and improper grading practices. Upon the County's acceptance of improvements, and satisfactory completion of a one-year maintenance period, unused portions of said deposit shall be refunded to the project applicant or authorized agent. If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans Ongoing during construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals before any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.			
Mitigation Measure 14-4d: Provide Placer County with verification of compliance with NPDES SWPPP Prior to construction commencing, the applicant shall provide evidence to the Placer County Engineering and Surveying Division of a Waste Discharge Identification (WDID) number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit.	Lahontan RWQCB Placer County Engineering and Surveying Department	Prior to Improvement Plan approval	During review of Improvement Plans
Mitigation Measure 14-4e: Use approved design standards for BMPs The Improvement Plans shall show that water quality treatment facilities/best management practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Department (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions). Construction (temporary) BMPs for the project include, but are not limited to: Hydroseeding (EC-4), Straw Mulch (EC-6), Velocity Dissipation Devices (EC-10), Silt Fencing (SE-1), Fiber Rolls (SE-5), Storm Drain Inlet Protection (SE-10), Wind Erosion Control (WE-1), and Stabilized Construction Entrances (TC-1)."	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans Ongoing during construction
Mitigation Measure 14-4f: Installation of source control and Low Impact Development standards This project is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001-DWQ), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit. The project shall implement permanent and operational source control measures as applicable. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans. The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management.	Lahontan RWQCB Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 14-4g: Comply with grading season prohibitions There shall be no grading or other disturbance of ground between October 15 of any year and May 1 of the following year, unless an extension has been granted by the ESD.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 14-4h: Comply with grading season prohibitions Per the State of California NPDES Phase II MS4 Permit, the MVWPSP project is a Regulated Project that creates and/or replaces 5,000 square feet or more of impervious surface. A final Storm Water Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or as a separate document that identifies how the project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface are also required to demonstrate hydromodification management of stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2-year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
15 Hydrology and Water Quality			
Mitigation Measure 15-1: Prepare and Implement a Stormwater Pollution Prevention Plan for each construction phase Each construction phase of the project shall be subject to the Statewide Construction General NPDES Permit from Lahontan RWQCB. As a condition of the NPDES permit, the project applicant shall develop a Stormwater Pollution Prevent Plan (SWPPP) prepared by a qualified SWPPP practitioner and/or a qualified SWPPP developer, which specifies water quality controls consistent with Lahontan RWQCB requirements and ensures that runoff quality maintains beneficial uses of Middle Martis Creek. The site-specific SWPPP developed for each construction phase shall describe the site controls, erosion and sediment controls, means of waste disposal, implementation of project specific plans required by local regulations, post-construction sediment and erosion control measures, and other impact reduction strategies unrelated to stormwater. BMPs identified in the SWPPPs shall be implemented during all development activities. Required elements of the SWPPPs include the following: ◢ Temporary BMPs to prevent the transport of earthen materials and other construction waste materials from disturbed land areas, stockpiles, and staging areas during periods of precipitation or runoff, including: filter fences, fiber rolls, erosion control blankets, mulch (such as pine needles and wood chips); and temporary drainage swales and settling basins. ◢ Designated contractor staging areas for materials and equipment storage outside of riparian areas. Designated staging and storage areas would be protected by construction fencing and/or silt barriers, as appropriate. Following project completion, all areas used for staging would be stabilized or revegetated. ◢ Temporary BMPs to prevent the tracking of earthen materials and other waste materials from the project site to offsite locations, including stabilized points of entry/exit for construction vehicles/equipment and designated vehicle/equipment rinse stations, and sweeping. ◢ Temporary BMPs to prevent wind erosion of earthen materials and other waste materials from the project site, including routine application of water to disturbed land areas and covering of stockpiles with plastic or fabric sheeting. ◢ A spill prevention and containment plan to minimize the potential for soil and groundwater contamination during construction. Project contractors would be responsible for proper storage of onsite materials and installation and maintenance of temporary BMPs capable of capturing and containing pollutants from fueling operations, fuel storage areas, and other areas used for the storage of hydrocarbon-based materials. This would include maintaining materials onsite for the cleanup of accidental spills (such as oil absorbent booms and sheets), maintaining drip pans beneath construction	Lahontan RWQCB	Prior to any construction or grading for each construction phase	Ongoing during each construction phase

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
equipment, training site workers in spill response measures, immediate cleanup of spilled materials in accordance with directives from the Lahontan RWQCB, and proper disposal of waste materials at an approved offsite location that is licensed to receive such wastes. ◢ Temporary BMPs to capture and contain pollutants generated by concrete construction including lined containment for rinsate to collect runoff from washing concrete delivery trucks and equipment. ◢ Protective fencing to prevent damage to trees and other vegetation to remain after construction, including tree protection fencing and individual tree protection such as protective casings of wood slats around the bases of trees. ◢ Temporary BMPs for the containment or removal of drilling spoils generated from construction of bridge foundations and abutments. ◢ Daily inspection and maintenance of temporary BMPs to ensure proper function. The prime contractor would be required to maintain a daily log of Temporary Construction BMP inspections and keep the log onsite during project construction, available for review by Lahontan RWQCB and Placer County. ◢ Tree removal activities, including the dropping of trees, would be confined to the construction limit boundaries. ◢ Construction boundary fencing to limit disturbance and prevent access to areas not under active construction.			
Mitigation Measure 15-2a: Install permanent water quality BMPs The Improvement Plans shall show that water quality treatment facilities/best management practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Department (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions). Storm drainage from on- and offsite impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified pollutants, as approved by the Engineering and Surveying Department (ESD). BMPs shall be designed at a minimum in accordance with the Placer County Guidance Document for Volume and Flow-Based Sizing of Permanent Post- Construction Best Management Practices for Stormwater Quality Protection. Post development (permanent) BMPs for the project include, but are not limited to: Vegetated Swales (TC-30), Infiltration Trenches (TC-10), Water Quality Inlets (TC-50), Pervious Pavements (SD-20), Storm Drain System Signs (SD-13), and Detention Basins (TC-22). No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals. All BMPs shall be maintained as required to insure effectiveness. The applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of ongoing maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming, and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Before Improvement Plan or Final Subdivision Map approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans Ongoing during operations

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 15-2b: Identify storm drain inlets to discourage illegal dumping The Improvement Plans shall include the message details, placement, and locations showing that all storm drain inlets and catch basins within the project area shall be permanently marked/embossed with prohibitive language such as "No Dumping! Flows to Creek." or other language and/or graphical icons to discourage illegal dumping as approved by the Engineering and Surveying Department (ESD). ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping shall be posted at public access points along channels and creeks within the project area. The Homeowners'/Property Owners' association is responsible for maintaining the legibility of stamped messages and signs.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans Ongoing during operation
Mitigation Measure 15-2c: Install source control and Low Impact Development measures Implement Mitigation Measure 14-4f. The project shall comply with the Placer County MS4Permit, pursuant to the NPDES Phase II program. This includes the installation of source control and LID measures to reduce the volume of runoff generated by the project.	Lahontan RWQCB Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 15-2d: Isolate trash and storage areas from stormwater flows The Improvement Plans shall show that all stormwater runoff shall be diverted around trash storage areas to minimize contact with pollutants. Trash container areas shall be screened or walled to prevent offsite transport of trash by the forces of water or wind. Trash containers shall not be allowed to leak and must remain covered when not in use.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 15-2e: Store potential contaminants in approved enclosures The Improvement Plans shall show that materials with the potential to contaminate stormwater that are to be stored outdoors shall be placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure that prevents contact with runoff or spillage to the stormwater conveyance system, or protected by secondary containment structures such as berms, dikes, or curbs. The storage area shall be paved to contain leaks and spills and shall have a roof or awning to minimize collection of stormwater within the secondary containment area.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 15-4a: Verify adequacy of groundwater supplies through modeling and supplement supplies, if necessary The U.S. Bureau of Reclamation and the Desert Research Institute have developed an integrated surface water/groundwater model (GSFLOW) specific to the MVGB, which is expected to be released in 2015. The GSFLOW model uses a hydrologic framework specific to the Martis Valley, and shall be used to determine potential groundwater recharge rates for the West Parcel and to develop a calibrated water budget for the MVWPSP project. Groundwater modeling shall be completed by a qualified hydrologist and shall incorporate the surface water mapping completed for the MVWPSP, as it reflects the most accurate source of hydrologic data. The modeling results shall be used to estimate the quantity of groundwater that can be sustainably extracted from aquifers beneath the West Parcel. Modeling shall be completed before construction of the proposed wells. If the groundwater modeling determines that the water demand (325 afy) from project buildout exceeds that which can be sustainably withdrawn using onsite wells, supplemental water shall be provided via connection to the existing NCSD system.	NCSD, Placer County Planning Services Division, and Placer County Environmental Health Services	During preparation of final design plans and specifications Prior to issuance of first Grading Permit	During review of Improvement Plans

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 15-4b: Monitor surface and groundwater resources within the project area Before the start of groundwater pumping, the project applicant and NCSD shall develop a long-term monitoring program for the surface and groundwater resources within the West Parcel. The goal of the monitoring plan will be to detect and assess long-term changes and trends in the hydrologic system because of pumping for municipal water supply, and to provide reasonable assurance of long-term pumping at sustainable rates. Surface waters shall be monitored to identify long-term trends and potential interactions between surface water volumes and groundwater pumping. The monitoring program shall identify drawdown and recovery threshold limits based on the performance of completed production wells. As an operational goal, the drop in groundwater elevation in the aquifer at each well shall not exceed a 20 percent drawdown of the water column for a period of time extending beyond three months. Aquifer responses shall be monitored by dedicated monitoring wells, and natural seasonal variance in water levels based pre-pumping monitoring will be factored into consideration. Monitoring wells may include test wells TW-3 and TW-5. As a component of its larger monitoring program, NCSD will be responsible for long-term monitoring of the performance of groundwater production wells on the project site, and adjusting pumping distributions between onsite or offsite water sources, if necessary. Surface waters shall be monitored to identify long term trends and potential interactions between surface water volumes and groundwater pumping. Reporting shall be completed annually or as otherwise dictated depending on the schedule of existing NCSD monitoring operations.	NCSD, Placer County Planning Services Division, and Placer County Environmental Health Services	Before the start of groundwater pumping	Ongoing during operations; bi-annual or quarterly monitoring
Mitigation Measure 15-5a: Prepare and implement a final drainage report As part of the Improvement Plan submittal process, the preliminary Drainage Report provided during environmental review shall be submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from the MVWPSP project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of Improvement Plan submittal.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 15-5b: Reduce runoff to pre-project conditions The Improvement Plan submittal and final Drainage Report shall provide details showing that stormwater run-off shall be reduced to pre-project conditions through the installation of retention/detention facilities. Retention/detention facilities shall be designed in accordance with the requirements of the Placer County Stormwater Management Manual that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Department (ESD), and shall be shown on the Improvement Plans. The ESD may, after review of the project final drainage report, delete this requirement if it is determined that drainage conditions do not warrant installation of this type of facility. Maintenance of detention facilities by the homeowner's association, property owner's association, property owner, or entity responsible for project maintenance shall be required. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.	Placer County Engineering and Surveying Department	Improvement Plan submittal	During review of Improvement Plans

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 15-6a: Delineate 100-year floodplain on subdivision maps On the Improvement Plans and Informational Sheet(s) filed with the appropriate Large Lot or Small Lot Final Subdivision Map(s), show the limits of the future, unmitigated, fully-developed 100-year floodplain (after grading) for Middle Martis Creek and designate same as a building setback line, unless greater setbacks are required by other conditions contained herein.	Placer County Engineering and Surveying Department and Flood Control District	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 15-6b: Demonstrate that all building pad elevations are a minimum of 2 feet above the 100-year floodplain line The Improvement Plans and Informational Sheet(s) filed with the appropriate Large Lot or Small Lot Final Subdivision Map(s) shall show finished building pad elevations to be a minimum of two feet above the 100-year floodplain line (or finished floor three feet above the 100-year floodplain line). The final pad elevation shall be certified by a California registered civil engineer or licensed land surveyor and submitted to the Engineering and Surveying Department. This certification shall be done before construction of the foundation or at the completion of final grading, whichever comes first. No construction is allowed until the certification has been received by the Engineering and Surveying Department and approved by the floodplain manager. Benchmark elevation and location shall be shown on the Improvement Plans and Informational Sheet (s) to the satisfaction of Development Review Committee.	Placer County Engineering and Surveying Department and Flood Control District	Improvement Plan submittal Prior to construction of the foundation or at the completion of final grading, whichever comes first	During review of Improvement Plans
Mitigation Measure 15-6c: Construct Middle Martis Creek Bridge to span 100-year floodplain limits The Improvement Plans for the construction of the main access road shall include the construction of a roadway bridge spanning the 100-year floodplain limits of Middle Martis Creek near the encroachment with SR 267.	Placer County Engineering and Surveying Department and Flood Control District	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 15-6d: Prohibit activities or construction that would increase the 100-year floodplain water surface elevation The project applicant shall prepare a final drainage report at the time of submittal of the project's initial improvement plans that demonstrates that the project will not increase the limits or water surface elevation of the 100-year floodplain of Middle Martis Creek upstream or downstream of the project site. The report shall be submitted with the project's initial Improvement Plans, and shall be reviewed and approved by the Engineering and Surveying Department and the Placer County Flood Control District. The floodplain analysis shall be prepared in conformance with the Placer County Stormwater Management Manual that is in effect at the time of submittal.	Placer County Engineering and Surveying Department and Flood Control District	Improvement Plan submittal	During review of Improvement Plans
Mitigation Measure 15-6e: Maintain or construct adequate flood storage within the 100-year floodplain of Middle Martis Creek The applicant shall maintain or construct adequate flood storage within the 100-year floodplain of Middle Martis Creek to the satisfaction of the ESD and the Placer County Flood Control District. This replacement storage shall only be associated with the construction fills associated with the roadway infrastructure required for development of the project. The applicant shall prepare an analysis to demonstrate the amount of storage to be replaced, the effect on flood flows of the replacement area, any effects on flood conveyance and methods to minimize any maintenance of the replacement storage. The size (volume) of this replacement shall be based on the volume of storage lost by project construction. Any required storage area shall be designed and shown on the applicable set of Improvement Plans for the project after the above analysis is approved by ESD and the Flood Control District. It shall be constructed concurrent with any grading taking place within the existing 100-year floodplain.	Placer County Engineering and Surveying Department and Flood Control District	Improvement Plan submittal	During review of Improvement Plans

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 15-6f: Prohibit grading within the 100-year floodplain To protect site resources, no grading activities of any kind may take place within the 100-year floodplain of the stream/drainage way unless otherwise approved as a part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). A standard note to this effect shall be included on the Improvement Plans. The location of the 100-year floodplain shall be shown on the Improvement Plans.	Placer County Engineering and Surveying Department and Flood Control District	Improvement Plan submittal	During review of Improvement Plans
16 Utilities			
Cumulative Mitigation Measure 16-8a: Increase capacity of the NCSD wastewater collection and conveyance system Prior to Placer County's environmental determination for each subsequent development entitlement, the project applicant shall coordinate with NCSD to determine the wastewater conveyance demand at buildout of each proposed development entitlement and provide the County with a copy of this coordination (e.g., will-serve letter or the equivalent). If the wastewater conveyance demand for an individual phase cannot be met with existing capacity in the NCSD collection and conveyance system, then prior to Improvement Plan approval, the applicant and NCSD shall develop plans for and construct improvements that would provide additional capacity in the NCSD system downstream from the point at which MVWPSP flows would enter the system. The wastewater conveyance and collection improvement plans developed by the project applicant and NCSD shall also identify the timing of such improvements, and that the capacity of the lines will be available when needed by project development. Prior to Improvement Plan approval, the project applicant shall provide evidence of payment to NCSD for fair share funding or show the construction of the improvements that would provide sufficient capacity for buildout of that phase to the satisfaction of NCSD. Improvements shall include: ◢ With MVWPSP sewer flows into the golf course siphon at manhole 237 under Sewer Option 1 and Sewer Option 2, upsize approximately 6,450 linear feet of the existing 8-inch siphon line through the golf course to 16-inch, and upsize approximately 11,500 linear feet of the existing 8-inch 267-TSD siphon line to 16-inch; and ◢ With MVWPSP sewer flows into the 267 to TSD siphon line downstream of the 267 Lift Station under Sewer Option 1 and Sewer Option 2, upsize approximately 11,500 linear feet of the existing 8-inch line to 16-inch; or ◢ Under Sewer Option 3, construct a direct sewer line from the West Parcel development area, along SR 267, to the TSD connection manhole at Truckee Tahoe Airport Road. This option would run parallel to the existing system (Exhibit 16-2).	NCSD and Placer County Planning Services Division	Prior to Improvement Plan approval	Prior to Improvement Plan approval
Cumulative Mitigation Measure 16-8b: Ensure sufficient capacity in TSD lines Prior to the Placer County Subsequent Conformity Review Process environmental determination for each development entitlement following Specific Plan approval, the project applicant shall coordinate with TSD to determine the wastewater conveyance demand at buildout of each proposed development entitlement and provide the County with a copy of the coordination. If TSD finds that project-generated peak wastewater flows exceed the capacity of the TSD line between the NCSD outfall at Truckee-Tahoe Airport Road and the TRI, NCSD and TSD shall develop plans for and construct improvements that would allow for conveyance of buildout wastewater flows. The improvements shall be constructed to meet peak wet weather flows of 520 gpm, or flows determined by final design plans, in the sewer line from the NCSD outfall to the TRI. The plans shall identify the timing of the improvements, and that the capacity of the lines will be available when needed by project development. Prior to Improvement Plan approval, the project applicant shall provide evidence of payment to NCSD and TSD for fair share funding or show the construction of the improvements, to be determined in coordination with	TSD, NCSD, and Placer County Planning Services Division	Prior to Improvement Plan approval	Prior to Improvement Plan approval

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
NCSD and TSD, which would provide sufficient capacity to the satisfaction of NCSD and TSD. Fair share funding or construction of the improvements by the project applicant shall also account for any additional permanent and/or temporary easements. Improvements shall include: ◢ Providing onsite wastewater detention facilities, such as enlarged pipes, vaults, or tanks, such that conveyance can be timed to coincide with off-peak conditions when the TSD line has sufficient capacity; or ◢ Replacing the existing TSD line with a larger sewer line that increases capacity to serve future demand for wastewater conveyance; or ◢ Installing an additional line parallel to the existing TSD line that increases capacity to serve future demand for wastewater conveyance. The developer of any project within the MVWPSP area shall be required, as part of the Placer County Subsequent Conformity Review Process and/or tentative map approval process, to submit a will-serve letter from NCSD prior to approval of improvement plans and/or prior to recordation of small lot final maps.			
17 Public Services and Recreation			
Mitigation Measure 17-3: Provide additional fire protection staffing Before recordation of the Large Lot Final Map or the initial Small Lot Final Map (or any commercial development), the project proponent shall develop and implement a funding plan that would sufficiently supplement tax revenue from the MVWPSP to add fire protections staff. Such funding shall remain in place until the funding stream from property tax revenue is sufficient to maintain fire protection standards of service. If this does not occur, an Assessment District would be necessary. In consultation with NFD, the fire protection staffing increases shall be tied to project occupancy such that level of service is maintained as level of risk is increased as the development is built out. The funding plan would provide for revenue to initially employ one additional full-time firefighter and then, over time as development occurs, to add another additional full-time firefighter to properly respond to a serious building fire that could occur in the vicinity of 5 miles from the fire station. The funding plan shall include the following framework for the trigger points for increased staffing. The trigger points for adding daily staffing above the current minimum of four should be: 1. With the certificate of occupancy of the first dwelling unit or any of the commercial space, the project developer shall provide the project's fair share contribution to overtime funds to the Northstar Fire Department to provide a minimum of five firefighters on duty 24/7/365. 2. With the certificate of occupancy of the 100th dwelling unit, or 50 percent of the commercial space, the project developer shall provide to the Department the added revenue to add two permanent full-time firefighters, one each to two shifts, raising the minimum staffing to six career firefighters 24/7/365. At this point, all three duty shifts will have six firefighters each. 3. With the certificate of occupancy of the 200th dwelling unit, or 75 percent of the commercial space, the project developer shall pay the project's fair share contribution to ensure the Department has the overtime funds to maintain a minimum of six career firefighters on duty 24/7/365.	NFD and Placer County Planning Services Division	Prior to approval of the initial Large Lot Final Map or the initial Small Lot Final Map	Prior to issuance of certificates of occupancy for the 100th, 200th, and 300th dwelling units.

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
4. With the certificate of occupancy of the 300th dwelling unit, or 100 percent of the commercial space, the project developer shall pay the project's fair share contribution to ensure that the department has the funds to add three additional firefighters, one per duty platoon, raising each to seven firefighters.			
18 Hazards and Hazardous Materials			
Mitigation Measure 18-2a: Conduct surveys for aerially deposited lead Prior to Improvement Plan approval (or issuance of an Encroachment Permit from Caltrans for construction within the SR 267 right-of-way), surface and shallow soils (up to two feet below ground surface), shall be surveyed for lead contamination. All sampling shall be conducted consistent with applicable Caltrans requirements. If aerially deposited lead contaminated soil is discovered, with total lead measuring greater than 1,000 mg/kg or soluble lead measuring greater than 5.0 mg/l, survey recommendations on soil management shall follow Caltrans protocol and shall be incorporated into the construction hazardous materials management plan described in Mitigation Measure 18-2c.	Placer County Environmental Health Services	Prior to Improvement Plan approval (or issuance of an encroachment permit)	Prior to and during construction within the SR 267 right-of-way
Mitigation Measure 18-2b: Conduct investigation and implement radon resistant construction techniques Prior to the occupancy of residential units, the applicant or construction manager shall retain a licensed radon contractor to determine if radon is detected beyond the 4 pCi/L threshold. If the amount of radon exceeds the established threshold, the applicant shall retain a licensed radon contractor to reduce the radon in the affected residences to below the established threshold. Methods include, but are not limited to, the soil suction radon reduction system, which entails the installation of a vent pipe system and fan that pull radon from beneath the house and vent it to the outside. The radon contractor shall develop clear instructions for proper maintenance of the radon monitoring systems that would be installed in each residence, as well as the radon monitoring and reduction system, if required. The maintenance instructions shall be included in the proposed project's covenants, conditions, and restrictions (CC&Rs). The property disclosure statements shall indicate that the site is within an area with a moderate potential for indoor radon levels.	Placer County Environmental Health Services	Prior to occupancy of residential units	During operation, prior to occupancy of residential units
Mitigation Measure 18-2c: Prepare and implement a construction hazardous materials management plan Improvement plans shall include a construction hazardous materials management plan to be prepared, reviewed, and approved by Placer County Environmental Health and Protection Services. The management plan shall include measures to reduce potential hazards to workers, the public, and the environment associated with use of hazardous materials, exposure to potentially contaminated soil, and blasting activities during project construction. The management plan shall include provisions for agency notification, managing impacted materials, sampling and analytical requirements and disposal procedures. The Plan shall cover the following: ◢ A hazardous materials contingency plan that describes the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction. The contingency plan shall describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials. The plan shall include measures to protect worker safety if signs of contamination are encountered (e.g., stopping work in the vicinity of the potential contamination), identify sampling and analysis protocols for various substances that might be encountered (e.g., volatile organic compounds, hydrocarbons, heavy metals), and list required regulatory agency contacts if contamination is found. The contingency plan shall include recommendations on soil management in the event that ADL is discovered in the SR 267 right-of-way. The plan shall also identify legal and regulatory processes and thresholds for cleanup of contamination.	Placer County Environmental Health Services	Prior to construction	Ongoing during construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ The project applicant shall retain the services of a qualified environmental contractor to prepare the contingency plan. ◢ The plan, and obligations to abide by and implement the plan, shall be incorporated into the construction and contract specifications for the project.			
Mitigation Measure 18-4: Provide additional fire protection staffing Implement Mitigation Measure 17-3 (see Chapter 17, "Public Services and Recreation"), which requires the project proponent to develop a mitigation plan to provide funding to supplement the projected fire mitigation fees and property taxes generated by the MVWPSP. The additional funding would support the addition of staffing to properly handle a serious building fire occurring within five miles of NFD Station 31. The mitigation plan includes trigger points for the increased staffing. Alternatively, the mitigation measure states that if a mitigation plan is not developed then a small Assessment District would be necessary to achieve the same objective.	NFD and Placer County Planning Services Division	Prior to approval of the initial Small Lot Tentative Map	At various phases of project development

EXHIBIT C

Stantec

Memo

To:	Stacy Wydra, Senior Planner, Placer County – Community Development Resource Agency	From:	Mike Wilkin, P.E. John Buzzone
	Through		Stantec Reno
	Eric Martin Northstar Community Services District		
File:	205300163	Date:	March 4, 2015

REGISTERED PROFESSIONAL ENGINEER MICHAEL S WILKIN C77310 CIVIL STATE OF CALIFORNIA 6-30-15

3-4-15

Reference: Martis Valley West Parcel Project - Water Supply Assessment

Under California Senate Bill 610 (SB610), water assessments must be furnished to local governments for inclusion in environmental documentation for certain projects subject to the California Environmental Quality Act. Placer County is responsible for completing a Water Supply Assessment (WSA) for the proposed Martis Valley West Parcel Project (the Project) to determine whether sufficient water supplies are available to meet the needs of the Project in addition to existing and planned future needs.

The Northstar Community Services District (NCSD) anticipates a request for annexation into its service area for the Project. NCSD does not meet the criteria of a Public Water Supplier as defined in SB610, and therefore is not charged with preparation of the WSA. However, because of the likelihood that the NCSD will provide service to the proposed Project, Placer County requested that the NCSD contract to have the WSA completed. Stantec Consulting Services (Stantec) was contracted by NCSD to prepare this WSA in accordance with SB610. This WSA is to be adopted by Placer County through the environmental permitting process for the Project.

This memorandum consists of four sections as follows:

- An introduction describing the Project and the purpose of this WSA;
- An identification and analysis of available water supplies;
- An estimate of the water demands for the Project, NCSD, and other entities relying on shared water resources; and
- An analysis of the sufficiency of the available water supplies to meet the needs of the Project.

INTRODUCTION

PROPOSED MARTIS VALLEY WEST PARCEL PROJECT

The proposed Project covers approximately 7,568 acres of which 6,376 acres are east of State Route 267 (the "East Parcel") and 1,192 acres are located west of State Route 267 (the "West Parcel"). The proposed project is a combined conservation and development plan where the East Parcel is conserved and there is a reduced development plan for the West Parcel. The 1,192-acre West Parcel has a developable area of approximately 775 acres, of which 112.8 acres are located in the Lake Tahoe Basin. The Project proposes to reduce the number of residential units from the allowed 1,360 units to 760 units (a 600-unit reduction). The proposed project also includes 34,500 square feet of commercial development (sundry shop, coffee shop, small community retail, and similar uses) and 22,000 square feet of recreational facilities on 6.6 acres. The residential units may be a mix of single family, townhomes/multiplexes, cabins, and condominiums with a total combined number not to exceed 760 units and is outlined in the Project's draft Specific Plan, specifically Table 3-3. As stated, the mixture of potential unit types is presented in the Notice of Preparation of an

Environmental Impact Report/Environmental Impact Statement of the Proposed Martis Valley West Parcel Specific Plan (Placer County, 2014) as follows:

Table 1 – Number of Residential Units in Proposed Project (taken from Project Specific Plan)

Unit Type	Probable Mix No. of Units	Potential Range No. of Units			
Single Family	375	300	375	360	500
Townhome/multiplex	265	250	125	350	200
Cabin	120	40	200	50	60
Condominium	0	170	60	0	0
Total Units	**760**	**760**	**760**	**760**	**760**

The West Parcel and a portion of the East Parcel are located within the NCSD's sphere of influence and the Project's proponents considered NCSD the best service provider alternative because of the NCSD's historical service records, level of service, and management ability and requested NCSD consider annexation of the Project area.

PURPOSE OF THE WSA

This WSA provides an analysis of whether sufficient water supplies are available to meet NCSD's existing and planned future demands in addition to the Project needs and meeting the requirements of SB610. This analysis considers projected supplies and demands under the normal year, a single dry year, and multiple dry years over a 20-year planning period. Should the WSA determine there are insufficient water supplies available to serve the project; the WSA should identify the steps to be taken to address the shortfall.

NORTHSTAR COMMUNITY SERVICES DISTRICT

NCSD is a local government entity founded in 1990 to provide water service, among other services, to residential and commercial customers in the Northstar Community. The service area covers approximately 1,855 acres and currently has approximately 70 commercial, 766 single family, and 1,237 multifamily service connections. The NCSD water system is divided into 12 pressure zones served by seven storage tanks with a combined capacity of approximately 3.63 million gallons (MG). The NCSD service area and its relative location are shown on Figure 1.

The NCSD currently operates a water treatment plant with raw water supplies coming from two springs, Big Springs and Sawmill Flat Springs. Storage for Sawmill Flat Springs is available in Reservoir A (Sawmill Lake). Additionally, NCSD operates two groundwater wells, TH-1 and TH-2, which are located within the Martis Valley Groundwater Basin (MVGWB). Wells TH-1 and TH-2 and the MVGWB are also shown on Figure 1.

URBAN WATER MANAGEMENT PLANS

No Urban Water Management Plan (UWMP) has been prepared for the NCSD service area; however, UWMPs have been developed for the nearby service areas of the Placer County Water Agency (PCWA) and the Truckee Donner Public Utilities District (TDPUD). These two agencies along with NCSD rely upon shared groundwater resources from the MVGWB and jointly prepared the Martis Valley Groundwater Management Plan (Bauer et al, 2013), which describes how the agencies will cooperatively manage the shared resource. None of the plans specifically address the water demands of the Project.

COMPREHENSIVE GROUNDWATER MANAGEMENT LEGISLATION

As a water service provider relying on groundwater supplies, NCSD will need to comply with the requirements of the recently passed Comprehensive Groundwater Management Legislation provided in Senate Bill 1168, Senate Bill 1319, and Assembly Bill 1739. These regulations provide key changes to the California Water Code and Government Code with a goal of establishing a framework for local control of groundwater regulation and management with State-level oversight for the sustainable and coordinated management of groundwater resources.

WATER SUPPLIES

WATER SERVICE CONTRACTS & WHOLESALE SUPPLIES

NCSD does not currently have any, nor does it rely upon, water service contracts or wholesale supplies to meet existing or planned future demands. Water service contracts or wholesale supplies are not anticipated to meet the proposed Project demands.

CURRENT AND PLANNED SOURCES WATER SUPPLY

NCSD holds interest in water rights either outright or through an agreement with Trimont Land Holdings, LLC and Trimont Land Company. The combined permits allow NCSD to divert 600 acre-feet per year (afy) from the Sawmill Flat, Big Springs, and Reservoir A. The water rights also provide for storage in Reservoir A. These water rights are summarized in Table 2.

Table 2 – Surface Water Rights

Permit No.	Owner of Record	Source	Permitted Appropriation
15905	Trimont	Unnamed Streamed (tributary to Martis Cr.)	Diversion: 1.3 cfs, shall not exceed 82 acre-feet in any month. Storage: Reservoir B. Shall not exceed 530 afy collected between Oct.1 and Apr. 30.
15906	NCSD	West Martis Cr.; Sawmill Flat Springs	Diversion: 0.3 cfs, shall not exceed 19 acre-feet in any month. Storage: Reservoir A. Shall not exceed 88 afy collected between Oct.1 and Apr. 30.
16618	Trimont/NCSD	Unnamed Springs (tributary to unnamed stream thence tributary to Martis Cr.)	Diversion: 2.5 cfs. Storage: None
16619	Trimont/NCSD	Unnamed Streamed (tributary to Martis Creek)	Diversion: 2.2 cfs. Storage: Reservoir A. Shall not exceed 180 afy collected between Oct.31 and May 31.
Collectively, the four permits authorize 1,206 afy with an instantaneous diversion rate 2.5 cfs and a maximum storage of 710 afy. By agreement, NCSD may appropriate 600 afy of this amount. Trimont Land Holdings, LLC and Trimont Land Company the right to appropriate the remaining 606 afy. By agreement, NCSD has priority for these sources of supply and for storage.			

In addition to the above surface water rights, NCSD has permits to operate two groundwater wells. These wells are completed within the MVGWB. Groundwater production rates are typically unconstrained in California. However, in the MVGWB, groundwater production rates are constrained by the terms and conditions of the Truckee River Operating Agreement (TROA). The signatory parties to TROA include the U.S. Department of the Interior, the U.S. Department of Justice, the State of Nevada, the Truckee Meadows Water Authority, the State of California, and the Pyramid Lake Paiute Tribe of Indians and codified in Public Law 101-618. In short, TROA places certain restrictions on well design and setback requirements from watercourses to prevent short-term impacts to surface flow rates caused by groundwater pumping. Additionally, and more importantly, TROA establishes a maximum diversion rate from the Truckee River basin between Lake Tahoe and the California/Nevada border. Per TROA, the total of all diversions (surface water and groundwater) in the Truckee River Basin between Lake Tahoe and the California/Nevada border combined shall not exceed 32,000 afy, of which, no more than 10,000 afy may be surface water diversions. This maximum diversion rate applies to surface water sources tributary to the Truckee River (streams and springs) and the MVGWB.

Current NCSD sources of water supply are summarized in Table 3. NCSD meets its current water demands using Big Springs and Well TH-2. Well TH-1 was constructed to serve as redundant supply and to meet future buildout conditions.

The water supply for the Project is expected to be groundwater from three additional wells currently under development at the proposed project site by the Project proponents. At present, three test wells have been constructed and test pumped, and the anticipated production rate for each completed well has been estimated. The final production wells will be completed only after the Project is approved and the appropriate permits obtained. If developed, the final productions wells will be dedicated to NCSD. The total available supply for the three future production wells was estimated to range between 445 afy and 887afy (InterFlow Hydrology, 2014). For the purposes of this WSA, the low end of the estimated production range is assumed for the wells, as presented in Table 3.

Table 3 – Summary of Current and Planned Water Supplies

	Projected Supply (afy)				
Sources of Supply	**2014**	**2019**	**2024**	**2029**	**2034**
Existing Sources					
Wholesale	0	0	0	0	0
Big Springs, Sawmill Flat Springs, & Reservoir A	600	600	600	600	600
Wells TH-1 & TH-2[1]	2,581	2,581	2,581	2,581	2,581
Reservoir A (storage only)[2]	710	710	710	710	710
Total of Existing Sources	**3,181**	**3,181**	**3,181**	**3,181**	**3,181**
Planned Sources					
Well-1[3]	81	81	81	81	81
Well-2[3]	162	162	162	162	162
Well-3[3]	202	202	202	202	202
Total of Planned Sources	**445**	**445**	**445**	**445**	**445**
Total of All Sources	**3,626**	**3,626**	**3,626**	**3,626**	**3,626**

Notes:
[1]Based on well capacity and pumping duration of 24 hours per day and 365 days per year.
[2]Storage only, not included in total available supply.
[3]Production well capacities are based on pump test results.

The annual water production for the previous five-years for the existing water sources in Table 3 above is presented in Table 4.

Table 4 – Previous Five-Year Water NCSD Production (Existing Sources)

Year	Big Springs (afy)	Sawmill Flat Springs (afy)	Well TH-1[1] (afy)	Well TH-2 (afy)	Total (afy)
2013	342	0	14	273	629
2012	348	0	-	313	661
2011	301	0	-	260	561
2010	283	0	-	298	581
2009	280	0	-	330	610

Notes:
[1]Well TH-1 was constructed in 2013.

Periods of drought can have significant impacts on water supplies. NCSD has monitored the flow rates from the Big Springs and Sawmill Flat since at least 1990. NCSD records include spring flows at the end of several multiple dry year periods. The lowest spring flow noted occurred in January 2015 and was approximately 20 gpm, or approximately 32 afy on an annual basis. This is down from the previously observed low flow of 48 afy noted in 1992. As a conservative estimate, the single dry year supply is assumed to equal the lowest multiple dry year period. The springs supplies anticipated following a single dry year and following multiple dry years are presented in Table 5.

Groundwater levels rise in wet years, increasing underground storage and decline during dry years reducing the stored volume. The storage volume of the MVGWB is reportedly approximately 484,000 af (Kaufman, 2011). Because the storage volume is so large, groundwater supplies are less susceptible to short-term dry periods. Therefore, the groundwater and supplies are not expected to be significantly impacted by a single dry year or by multiple dry years (four years) and the yield estimate for a single dry year and for multiple dry years are assumed to equal the normal year yield. The groundwater supplies are included in Table 5.

Table 5 – Existing Supplies during a Single Dry Year and Multiple Dry Years

	Big Springs	Sawmill Flat Springs	Well TH-1	Well TH-2
Single Year Yield (afy)	484	32	1,290	1,290
Total All Sources	**3,097**			
Multiple Dry Year Yield (afy)	484	32	1,290	1,290
Total All Sources	**3,097**			

GROUNDWATER CONDITIONS

The MVGWB is located in the Sierra Nevada physiographic region and has a complex geology consisting primarily of sedimentary deposits and volcanic rock with numerous faults. These structure types contribute to a highly varying occurrence of groundwater and recharge. The primary water-bearing units are the Truckee Formation, Lousetown Volcanics, and Prosser Formation. The Truckee Formation is comprised of lake and stream alluvium with interlayered silts, sands, and clays, with sands and gravels toward the center of the MVGWB. The Lousetown Volcanics are comprised of fractured volcanic rock with water found along fractures. The Prosser Formation is comprised of stream alluvium with interlayered silts, sands, and clays. The boundary of the MVGWB is shown on Figure 1.

Rajagopal, et al (2012) developed spatially distributed estimates of annual groundwater recharge in the MVGWB using the Precipitation Runoff Modeling System (PRMS). The model estimates the mean annual recharge to be approximately 33,000 afy. For comparison, the authors estimated the mean annual recharge rate using the modified Maxey-Eakin method. The modified Maxey-Eakin method resulted in an estimate of 35,168 afy, higher than the PRMS estimate. Previous estimates cited in the report ranged between 18,000 afy and 34,560 afy. Based on their analysis, the authors concluded the mean annual recharge rate is approximately 33,000 afy.

Researchers with the Desert Research Institute (DRI) in Reno, Nevada are in the process of developing a linked surface water and groundwater model that is expected to refine the estimate of groundwater recharge rates within the MVGWB. However, at the time this WSA was prepared, the results of the analysis were unavailable. The results of the study are expected to refine the spatial and temporal understanding of the MVGWB recharge rates, but are not expected result in a significantly different estimate of the overall recharge rate. NCSD should review the results of the DRI study when they become available and make any adjustments to available supply estimate, as may be deemed appropriate.

As noted previously, NCSD relies upon groundwater from the MVGWB to meet current and planned future water demands. The MVGWB is a resource shared with other public and private users. Other users of MVGWB groundwater include TDPUD, PCWA, commercial irrigators (golf courses), commercial snowmaking, and residential domestic wells. The volume of groundwater produced by residential domestic wells is expected to be negligible in comparison to the other users and is not quantified here.

The primary users of the MVGWB, NCSD, TDPUD, and PCWA, partnered to more effectively manage the use of the MVGWB and prevent overdrafting the aquifer. Through a broad stakeholder process, they cooperatively developed the Martis Valley Groundwater Management Plan (Bauer et al, 2013) in April 2013. The stated goal of the plan is to *"...ensure long term quality and availability of groundwater resources in the Martis Valley Groundwater Basin."* The plan established six management objectives:

1. Manage groundwater to maintain established and planned uses;
2. Manage groundwater use within the provisions of TROA;
3. Collaborate and cooperate with groundwater users and stakeholders in the MVGWB;
4. Protect groundwater quantity and quality;
5. Pursue and use the best available science and technology to inform the decision making process; and
6. Consider the environment and participate in the stewardship of groundwater resources.

The plan includes regional coordination to share monitoring data, water production, and planned activities with the intent of complying with the diversion limitations provided in TROA and to prevent overdraft of the aquifer. At present, the California Department of Water Resources has not determined the MVGWB is being over drafted and the MVGWB remains unadjudicated.

According to the Martis Valley Groundwater Management Plan (Bauer et al, 2013), groundwater levels in the MVGWB have been largely stable with some declines occurring within specific regions. The management plan presents groundwater level data obtained from the California Department of Water Resources for 16 long-term monitoring wells in the MVGWB and infers that the groundwater is locally viable. The plan observes that water levels rise in some wells, while it declines in other wells over the same period of time, and concludes there may be multiple water-bearing zones in the MVGWB that may or may not be hydraulically connected.

Given that the current available resource estimate is 33,000 afy, the MVGWB is unadjudicated, and there is no evidence suggesting widespread overdrafting, the available groundwater resource is constrained by the diversion rates set forth in TROA. As noted previously, TROA restricts the total combined surface water and groundwater diversions between Lake Tahoe and the Nevada border to 32,000 afy, of which the surface water diversions can be no more than 10,000 afy. Therefore, the available groundwater resource is between 22,000 afy and 32,000 afy, depending upon the amount of surface water diverted. Further, it is NCSD goal to operate in accordance with TROA requirements, even though TROA is not yet fully implemented.

WATER DEMANDS

PROPOSED PROJECT

As noted previously, the proposed project will consist of 760 residential units and 34,500 square feet of commercial development and 22,000 square feet of recreational facilities. A portion of the Project lies within the Tahoe Basin and an estimated 10% of the proposed residential units may be sited within the Tahoe Basin. Figure 2 shows the location of the Project relative to the Tahoe Basin and the existing NCSD service area. As noted in TROA, developments within the Tahoe Basin must be served by water sources from within the Tahoe Basin. Accordingly, Project developments within the Tahoe Basin will be served by a to-be-determined source within the Tahoe Basin. This WSA specifically excludes water demands for development occurring within the Tahoe Basin. However, the exact number of residential units to be developed in the Tahoe Basin is not certain at this time. As such, the water demand calculated for the Project is based on the total number of proposed residential units, as a conservative assumption and recognizing that about 10% will actually be supplied by a water source within the Tahoe Basin.

To estimate the water supply needed to support the Project, average day water demands per unit by type is needed. The Northstar Water Model Project – Technical Memorandum No. 1 (Auerbach 2004) provides flow factors for various types of residential units and land uses specific to the NCSD service area and were used to model the NCSD water distribution system. These flow factors are used to estimate water demands for the Project using the probable number of residential units and commercial acreage presented in Table 1. The flow factors and the estimated water demands for the Project are provided in Table 6. It should be noted that these flow factors were developed to describe an average day demand and tend to overestimate the annual demand because the units will be predominantly vacation homes and not have full-time occupancy. As such, these demand estimates are conservative.

Table 6 – Flow Factors and Proposed Project Water Demands

	Single Family (gpd/unit)	Townhome/ Multiplex (gpd/unit)	Cabin (gpd/unit)	Condo (gpd/unit)	Commercial (gpd/sq ft)	Golf Course (ac-ft/mo)	Snowmaking (ac-ft/ac)
Flow Factor	420	300	300	300	0.30	52.50	0.96
Number of Proposed Units[1]	375	265	120	0	56,500[2]	0	0
Consumption (gpd)	157,500	79,500	36,000	0	16,950	0	0
Annual Consumption (afy)	176.4	89.0	40.3	0	19.0	0	0
Total (afy)	**325**						

Notes:

[1] As a conservative assumption, demand calculations are based on the total number of probable units presented in the Project Notice of Preparation of an Environmental Impact Report/Environmental Impact Statement for the Proposed Martis Valley West Parcel Specific Plan Project (Placer County, 2014). Some of these units may be developed in the Tahoe Basin and served by a water supply in the Tahoe Basin.

[2] The 22,000 square feet of recreational facilities are assumed to have a commercial demand pattern and are included with the commercial development.

NCSD DEMANDS

The current NCSD customers include single family and multifamily (includes condominiums and multiplexes) and commercial customers. The commercial development includes hotels, restaurants, and shopping business. In addition, NCSD provides irrigation water to a golf course. NCSD maintains a pressure zone map showing the number of current connections and total number of parcels within each pressure zone. This map, last updated in September 2013, is provided in Appendix A. Using this information and supplementary information provided by NCSD, the current number of single family and multifamily units to be added to reach the buildout condition was estimated to be:

- Single Family Units to be Added – 595
- Multifamily Units to be Added – 1,148

Using this estimate for the remaining development and the water demand estimates per unit presented in Table 6, the additional water demand for NCSD is estimated to be approximately 666 afy. It is assumed these units will be added by 2034 with a linear growth rate and as shown in Table 7.

Table 7 – NCSD Current and Planned Future Water Demands

	2014	2019	2024	2029	2034
Residential and Commercial (afy)	353	520	686	852	1,019
Golf Course Irrigation (afy)	185	185	185	185	185
Total (afy)	538	705	871	1,037	1,204

DEMAND PROJECTIONS FOR OTHER MVGWB AND TRUCKEE RIVER BASIN USERS

Because the water resources of the MVGWB and the Truckee River Basin are shared, it is important to consider other planned and expected uses of the water resources. Other current users of the MVGWB include TDPUD, PCWA, Vail Resorts, and golf courses (private supplies). Water users within the Truckee River Basin include Squaw Valley Public Services District, Squaw Valley Mutual Water Company, Resort at Squaw Creek, Squaw Valley Resort, and Alpine Springs County Water District. An estimate of the current and projected demands for each of these users is provided below. These demand estimates are based upon published documents and/or demand estimates provided by the entities. These estimates were not independently verified and were the best available information at the time this WSA was prepared.

Truckee Donner Public Utility District Demand Projections

The TDPUD provides water service to a large area surrounding the City of Truckee; however, its overall population density is relatively low. TDPUD has approximately 12,600 service accounts. In addition to providing water service to residential and commercial customers, TDPUD also provides irrigation water service (non-potable) to four golf courses. The TDPUD currently relies solely on groundwater and all of its wells are within the MVGWB. According to its UWMP (Kaufman, 2011), TDPUD anticipates it will utilize

groundwater to meet its future demand, but notes that if necessary it may also utilize surface water supplies. The TDPUD water demands presented in TDPUD's UWMP are summarized in Table 8. The UWMP identifies water demands out to 2030 and its ultimate buildout condition. For the purposes of this WSA, buildout is assumed to occur in 2034.

Table 8 – TDPUD Water Demands

	2010	2015	2020	2025	2030	Buildout (2034*)
Groundwater Supply (afy)	5,686	7,864	8,794	9,720	10,649	12,134

Notes:
Buildout conditions are assumed to be reached in 2034.

Placer County Water Agency Demand Projections

The PCWA covers a broad area with only a small portion of its service area falling within the MVGWB. This area, known as PCWA Zone 4 relies exclusively on MVGWB to meet the demands within the zone. According to the Placer County Water Agency 2010 Urban Water Management Plan (Tully & Young, 2010), PCWA currently operates two wells, but may develop additional wells to meet growing demands. The plan presents PCWA's planned water supplies for Zone 4 in five-year increments. For the purpose of this study, it is assumed the PCWA supplies equal its future demands. The UWMP identifies water demands out to 2035. For the purposes of this WSA, 2034 demands are assumed to equal 2035 demands.

Table 9 – PCWA Water Demands

	2010	2015	2020	2025	2030	2034
Groundwater Supply (afy)	172	306	439	573	707	800

Vail Resorts (Northstar Resort) Demands

Vail Resorts operates the Northstar Resort and utilizes water drawn from Big Springs, Reservoir A, and the Martis Camp Well (privately held) for snow making in the winter months. Big Spring diversions are made under the Trimont water rights (see Table 2) and as noted in the agreement between NCSD and Trimont, NCSD diversions are senior to the snow making diversions. Approximately 500 acres are currently developed with snow making equipment. As reported by Vail Resorts, an additional 700 acres may be added by the year 2034. For the purposes of this analysis, it is assumed the growth in land under snow making operations will increase linearly. Assuming snow making requires 0.96 afy per acre, the future snow making demands are estimated for the planning period and summarized in Table 10.

Additionally, Vail Resorts has three wells providing water to on-mountain restaurants. These wells are located within the resort area and are not within the MVGWB. The three wells as reported by Vail Resorts have a combined production capacity of approximately 540 gpm. The restaurants are generally open only during the winter ski season. Current usage was not available at the time this WSA was prepared, and for the purposes of this WSA, the total water demand for the three wells was assumed to equal the well capacities operated 18 hours per day for six months. These demands are included in Table 10.

Table 10 – Vail Resorts Water Demands

	2014	2019	2024	2029	2034
Commercial (afy)	322	322	322	322	322
Snowmaking (afy)	399	567	735	903	1,071
Total Demand (afy)	710	889	1,057	1,225	1,393

Squaw Valley Water Demands

There are four entities producing water for consumption within Squaw Valley: Squaw Valley Public Services District (SVPSD), Squaw Valley Mutual Water Company (SVMWC), Resort at Squaw Creek (RSC), and Squaw Valley Resort (SVR). Groundwater is the primary source of water supply and obtained from wells completed in the Olympic Valley Groundwater Basin and from wells completed in the fractured bed in the mountainous region above (Farr West et al, 2014). These sources are not part of the MVGWB, but do need to be included in the accounting of water demands as provided under TROA. According to the Village at Squaw Valley Specific Plan Water Supply Assessment (Farr West et al, 2014), the 2012 water demand for the four entities combined was 825 afy. According to plan, the projected water demand is expected to increase to 1,205 afy by the year 2040. Of this future demand, 150 afy is noted for snow making purposes. The plan was prepared to address the needs of the proposed Village at Squaw Valley project, which has an estimated buildout demand of 234 afy. Assuming the Village at Squaw Valley project is approved, the resulting combined water demand for all Squaw Valley users in assumed to be 1,439 afy. For the purposes of this WSA, the buildout demand is expected to occur by 2034.

Alpine Springs County Water District Demands

The Alpine Springs County Water District utilizes water from wells and four springs (horizontal wells) (Stantec, 2013). The current (2012) water demand is reportedly 189 afy and the buildout is expected to be 342 afy. No date was provided for reaching the buildout condition and for the purpose of this report it will be assumed to occur in 2034. Like the Squaw Valley water diversion, the Alpine Springs County Water District water diversion must be included in the TROA diversion accounting, but are not taken from the MVGWB.

Golf Course Demand Projections

There are nine golf courses in the region. Four are served by TDPUD and one is served by NCSD. The demands for these five golf courses are included in the demand estimate for each respective agency. The remaining four golf courses, however they are privately served. The Martis Valley Groundwater Management Plan (Bauer et al, 2013) estimates the water demand for the four golf courses to be approximately 993 afy.

Snowmaking Credits

The uses noted above include water demands for snowmaking. Snowmaking is not a strictly consumptive activity and a portion of the water used to make snow is returned to either the surface water supply during the spring melt off or to the groundwater aquifer through infiltration. Per the Truckee-Carson-Pyramid Lake Water Rights Settlement Act, the first 225 acre-feet of water used for snowmaking in California each year shall not be charged to the gross diversion specified under TROA (32,000 afy). Diversions in excess of the 225 afy allocation, will have only 16% of the diversion (of the amount over 225 afy) accrued against the TROA 32,000 gross diversion rate. However, to be conservative in the development of this WSA, the 225 afy allotment and

the reduction for diversions exceeding the 225 afy are not applied in the accounting of water demands and supplies.

SUFFICIENCY OF SUPPLY

There are two analyses that need to be performed to determine whether or not NCSD has sufficient sources of supply available to provide water service to the Project. First, it must be determined whether the regional resources, which are shared with other users, have sufficient capacity to meet the needs of the identified users in addition to the Project at the end of the planning period (2034). Secondly, it must be determine whether the NCSD sources of supply have sufficient available capacity to meet the Project needs in addition to NCSD current and planned future needs.

For the first analysis, the total combined demands for all users occurring at the end of the planning period need to be compared to the available resources. As noted previously, the mean annual recharge estimate exceeds the TROA constraint and therefore it is the TROA constraint that dictates the total available resource. Accordingly, the TROA constraint is used as the maximum available resource.

Table 11 – 2034 Water Demands for all Users and Available Resources

Identified Users	2034 Demand (afy)
NCSD	1,204
Proposed Project	325
TDPUD	12,134
PCWA	800
Vail Resorts	1,393
Squaw Valley Users (SVPSD, SVMWC, RSC, & SVR)	1,439
Alpine Springs County Water District	342
Privately Served Golf Courses	993
Total Demand	**18,630**
Total Available Resources	**32,000**

It should also be noted that the TDPUD UWMP (Kaufman, 2011) estimates the buildout demand for the entire MVGWB to be approximately 21,000 afy. Both future demand estimates (buildout and 2034) are substantially less than the estimate of the available resource. Furthermore, much of the water used in snow making is returned to the system through recharge or snow melt runoff so the demand estimates are expected

to be even lower than estimated here. Therefore, the resources available to the region exceed the regionally identified demands.

The second analysis is needed to determine whether NCSD sources of supply are sufficient to meet the proposed Project demand in addition to its current and planned future demands. This analysis also considers the effect of a single dry year and multiple dry years. In the single dry year, the water demand is assumed to increase by 10%. In the multiple dry years, the water demand is assumed to decrease by 10% due to conservation efforts. Comparison of the sources of supply and NCSD water demands for the normal year, single dry year, and multiple dry years are provided in Tables 12 through 14. The tables assume the Project will reach buildout conditions in 2034 and a linear growth rate.

Table 12 – Summary of Normal Year NCSD Demands and Water Supplies

	Projected Supply (afy)				
Sources of Supply	**2014**	**2019**	**2024**	**2029**	**2034**
Existing Sources					
Wholesale	0	0	0	0	0
Big Springs, Sawmill Flat Springs, & Reservoir A	600	600	600	600	600
Wells TH-1 & TH-2	2,581	2,581	2,581	2,581	2,581
Total of Existing Sources	**3,181**	**3,181**	**3,181**	**3,181**	**3,181**
Planned Sources					
Well-1	81	81	81	81	81
Well-2	162	162	162	162	162
Well-3	202	202	202	202	202
Total of Planned Sources	**445**	**445**	**445**	**445**	**445**
Total of All Sources	**3,626**	**3,626**	**3,626**	**3,626**	**3,626**
Total of NCSD Demands	**538**	**705**	**871**	**1,037**	**1,204**
Surplus (+)/Deficit(-)	**+3,088**	**+2,921**	**+2,755**	**+2,589**	**+2,422**
Project Demands	**0**	**81**	**163**	**244**	**325**

Table 13 – Summary of Single Dry Year NCSD Demands and Water Supplies

	Projected Supply (afy)				
Sources of Supply	**2014**	**2019**	**2024**	**2029**	**2034**
Existing Sources					
Wholesale	0	0	0	0	0
Big Springs, Sawmill Flat Springs, & Reservoir A	516	516	516	516	516
Wells TH-1 & TH-2	2,581	2,581	2,581	2,581	2,581
Total of Existing Sources	**3,097**	**3,097**	**3,097**	**3,097**	**3,097**
Planned Sources					
Well-1	81	81	81	81	81
Well-2	162	162	162	162	162
Well-3	202	202	202	202	202
Total of Planned Sources	**445**	**445**	**445**	**445**	**445**
Total of All Sources	**3,542**	**3,542**	**3,542**	**3,542**	**3,542**
Total of NCSD Demands (10% increase)	**592**	**776**	**958**	**1,141**	**1,324**
Surplus (+)/Deficit(-)	**+2,950**	**+2,766**	**+2,584**	**+2,401**	**+2,218**
Project Demands (10% increase)	**0**	**89**	**179**	**268**	**358**

Table 14 – Summary of Multiple Dry Year NCSD Demands and Water Supplies

	Projected Supply (afy)				
Sources of Supply	**2014**	**2019**	**2024**	**2029**	**2034**
Existing Sources					
Wholesale	0	0	0	0	0
Big Springs, Sawmill Flat Springs, Reservoir A	516	516	516	516	516
Wells TH-1 & TH-2	2,581	2,581	2,581	2,581	2,581
Total of Existing Sources	**3,097**	**3,097**	**3,097**	**3,097**	**3,097**
Planned Sources					
Well-1	81	81	81	81	81
Well-2	162	162	162	162	162
Well-3	202	202	202	202	202
Total of Planned Sources	**445**	**445**	**445**	**445**	**445**
Total of All Sources	**3,542**	**3,542**	**3,542**	**3,542**	**3,542**
Total of NCSD Demands (10% decrease)	**484**	**635**	**784**	**933**	**1,084**
Surplus (+)/Deficit(-)	**+3,058**	**+2,907**	**+2,758**	**+2,609**	**+2,458**
Project Demands (10% decrease)	**0**	**73**	**146**	**219**	**293**

In all cases the available supply exceeds the NCSD water demands. Additionally, the remaining surplus exceeds the Project demands.

From the above, two significant conclusions are drawn:

- NCSD has sufficient and available water supplies to meet its current and planned future demands.
- The available water supply is sufficient to meet the needs of the Project in addition to planned NCSD demands.

REFERENCES

Auerbach 2004, Northstar Water Model Project – Technical Memorandum No. 1, Auerbach Engineering Corporation, February, 2004

Bauer T, et al 2013, Martis Valley Groundwater Management Plan, Brown and Caldwell & Balance Hydrologics Inc., April 2013

Farr West et al 2014, Village at Squaw Valley Specific Plan Water Supply Assessment, Placer County and Squaw Valley Public Service District, July 3, 2014

Kaufman 2011, Truckee Donner Public Utility District Urban Water Management Plan, Neil Kaufman, Truckee Donner Utility District, June 2011

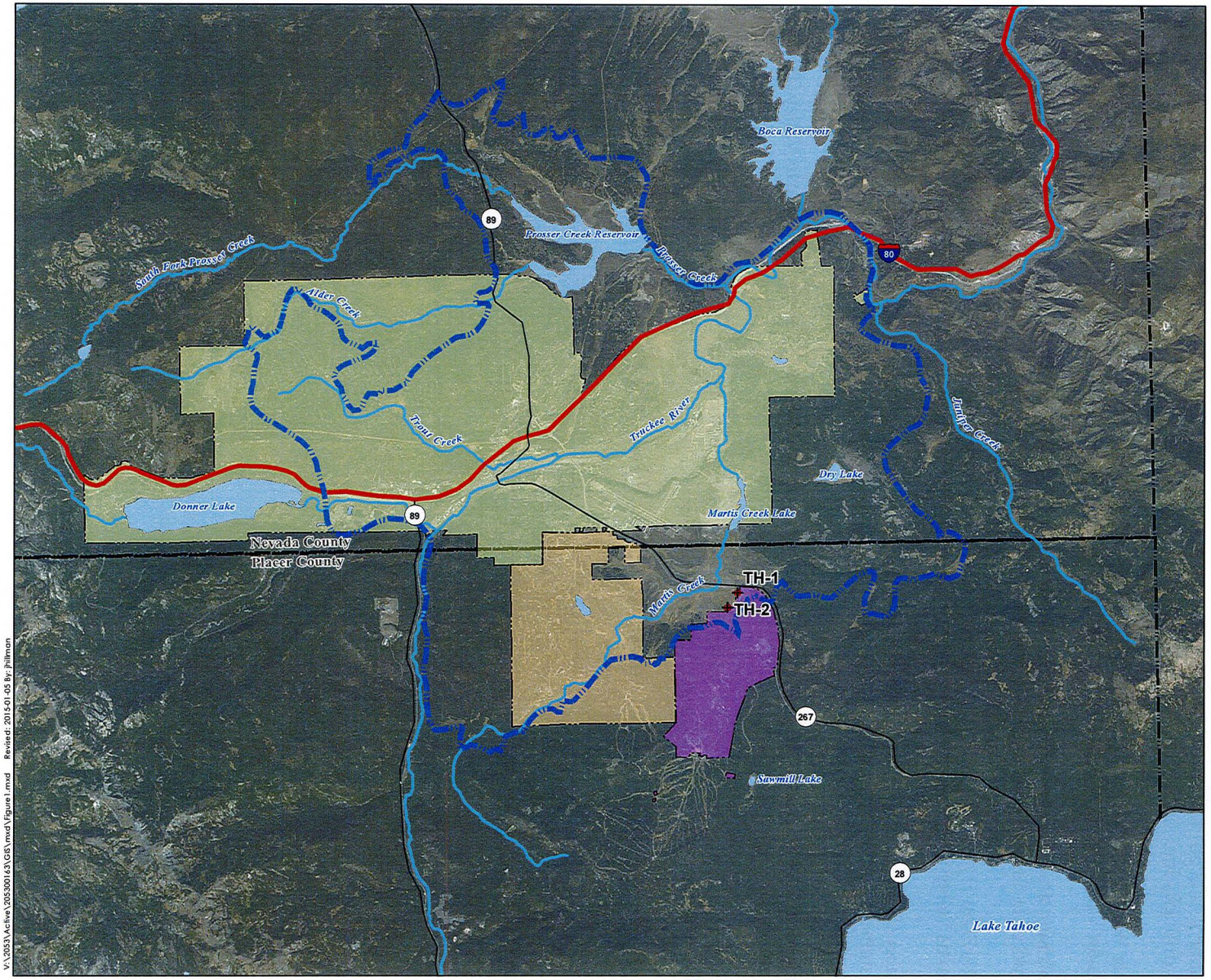
InterFLow Hydrology, Inc. 2014, Summary of exploration drilling, pump tests and water quality analyses, Martis Valley West Parcel, Placer County, California, CREW Tahoe, LLC, October 2014

Placer County 2011, Project Notice of Preparation of an Environmental Impact Report/Environmental Impact Statement for the Proposed Martis Valley West Parcel Specific Plan Project, Community Development Resource Agency, March 28, 2014

Rajagopal S. et al, 2012, Technical Note -Estimates of Ground Water Recharge in the Martis Valley Ground Water Basin, Desert Research Institute, September 10, 2012.

Stantec Consulting Inc., 2013, Proposed Alpine Sierra Development Water and Sewer Facility Evaluation, Alpine Spring County Water District, August 26, 2013

Tilly & Young 2011, Placer County Water Agency 2010 Urban Water Management Plan, Adopted June 16, 2011



Stantec

Legend

- NCSD Production Well
- Martis Valley Groundwater Basin
- Placer County Water Agency Zone 4 Service Area
- Truckee Donner PUD Service Area
- Northstar Community Services District Service Area

N

0 6,000 12,000

Feet

Coordinate System: NAD 1983 2011 StatePlane California II FIPS 0402 Ft USFoot US

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Project Location: Northeast California

Prepared by jh on 2014-07-31

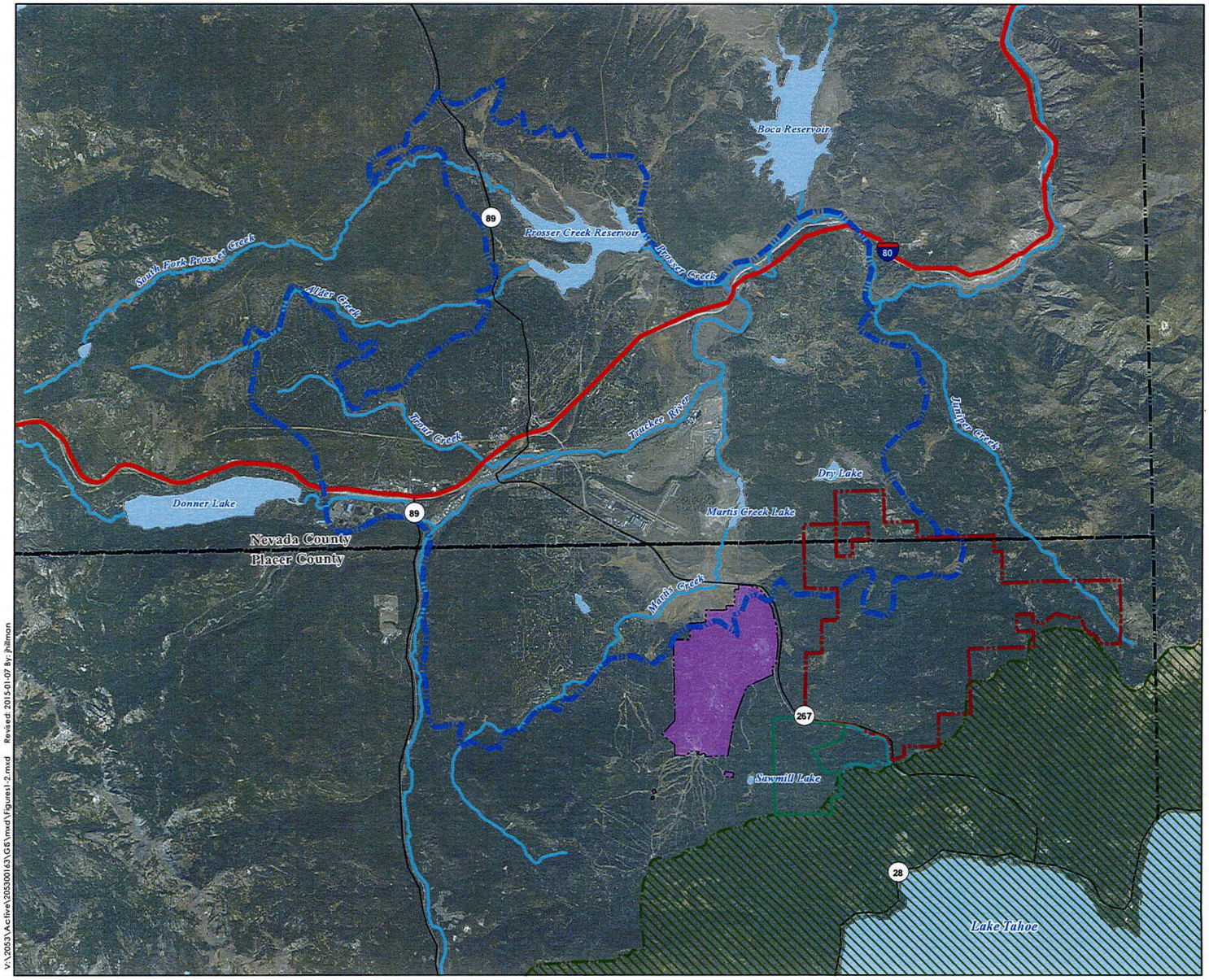
Client/Project
Northstar Community Services District

Figure 1

Title
MARTIS VALLEY WEST PARCEL
WATER SUPPLY ASSESSMENT

V:\2053\Active\205300163\GIS\mxd\Figure1.mxd Revised: 2015-01-05 By: jhillman

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format and has not verified the completeness or accuracy of the data provided.



Stantec

Legend

- MVO - SPI West Development Parcel
- MVO - SPI West Conservation Parcel
- MVO - SPI East Conservation Parcel
- Martis Valley Groundwater Basin
- Lake Tahoe Basin Boundary (Approx.)
- Northstar Community Services District Service Area

N

0 6,000 12,000

Feet

Coordinate System: NAD 1983 2011 StatePlane California II FIPS 0402 Ft USFoot US

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Project Location: Prepared by jlh on 2014-07-31

Northeast California

Client/Project

Northstar Community Services District

Figure 2

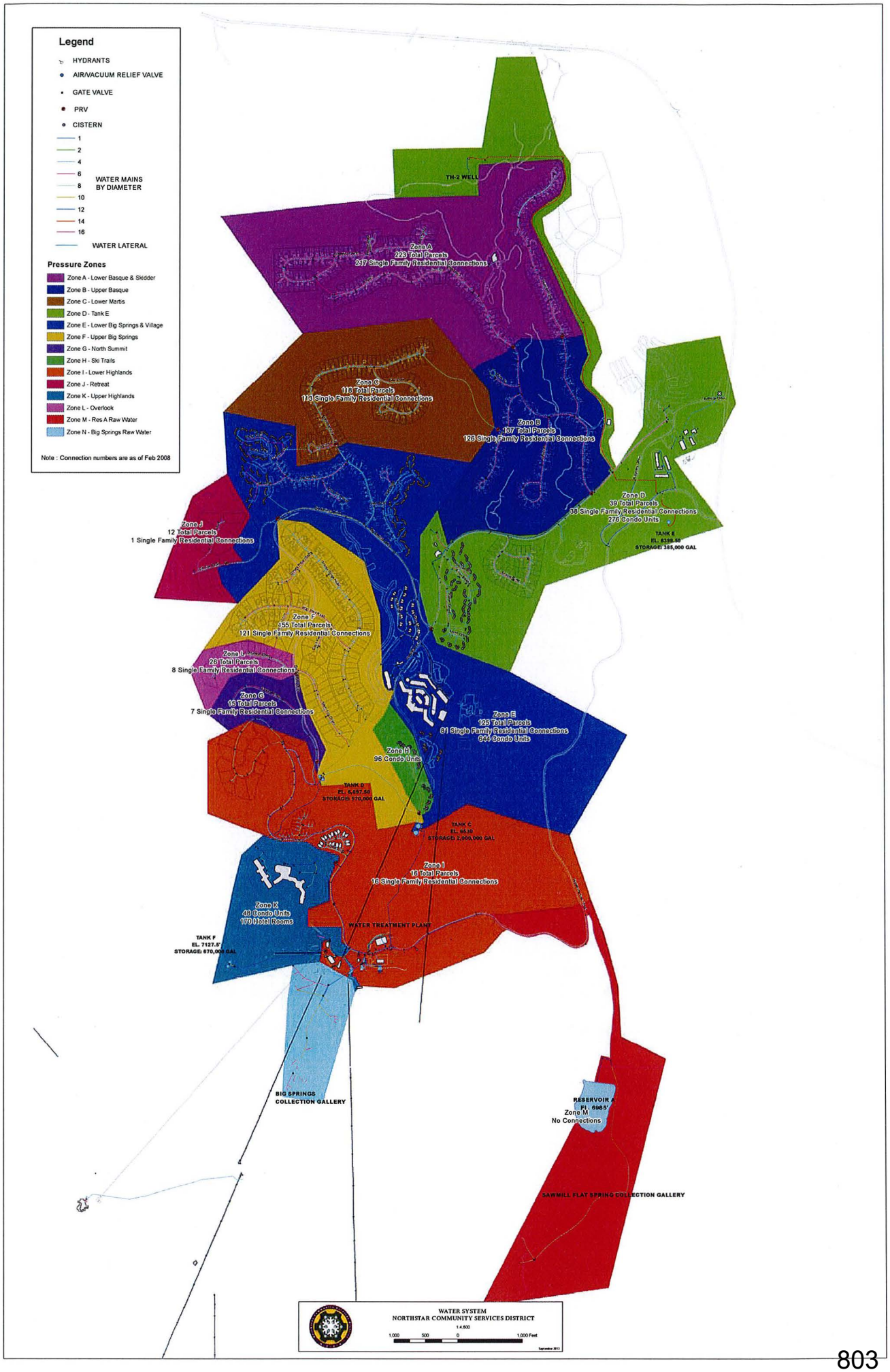
Title

MARTIS VALLEY WEST PARCEL WATER SUPPLY ASSESSMENT

V:\2053\Active\205300163\GIS\mxd\Figure1-2.mxd Revised: 2015-01-07 By: jhillman

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format and has not verified the completeness or accuracy of the data provided.

ATTACHMENT


Legend
HYDRANTS
AIR/VACUUM RELIEF VALVE
GATE VALVE
PRV
CISTERN
1
2
4
6
8
10
12
14
16
WATER MAINS BY DIAMETER
WATER LATERAL
Pressure Zones
Zone A - Lower Basque & Skidder
Zone B - Upper Basque
Zone C - Lower Martis
Zone D - Tank E
Zone E - Lower Big Springs & Village
Zone F - Upper Big Springs
Zone G - North Summit
Zone H - Ski Trails
Zone I - Lower Highlands
Zone J - Retreat
Zone K - Upper Highlands
Zone L - Overlook
Zone M - Res A Raw Water
Zone N - Big Springs Raw Water
Note : Connection numbers are as of Feb 2008
TH-2 WELL
Zone A
223 Total Parcels
217 Single Family Residential Connections
Zone C
118 Total Parcels
113 Single Family Residential Connections
Zone B
187 Total Parcels
126 Single Family Residential Connections
Zone D
39 Total Parcels
38 Single Family Residential Connections
276 Condo Units
TANK E
EL. 6398.50
STORAGE: 385,000 GAL
Zone J
12 Total Parcels
1 Single Family Residential Connections
Zone F
155 Total Parcels
121 Single Family Residential Connections
Zone L
28 Total Parcels
8 Single Family Residential Connections
Zone G
15 Total Parcels
7 Single Family Residential Connections
Zone E
125 Total Parcels
81 Single Family Residential Connections
544 Condo Units
Zone H
96 Condo Units
TANK D
EL. 6,497.50
STORAGE: 570,000 GAL
TANK C
EL. 6630
STORAGE: 2,000,000 GAL
Zone I
18 Total Parcels
18 Single Family Residential Connections
Zone K
48 Condo Units
170 Hotel Rooms
WATER TREATMENT PLANT
TANK F
EL. 7127.5'
STORAGE: 870,000 GAL
BIG SPRINGS
COLLECTION GALLERY
RESERVOIR A
EL. 6985'
Zone M
No Connections
SAWMILL FLAT SPRING COLLECTION GALLERY
WATER SYSTEM
NORTHSTAR COMMUNITY SERVICES DISTRICT
1:4,800
1,000 500 0 1,000 Feet
September 2012