



Placer County
Planning Services Division
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Ascent Environmental, Inc.
455 Capitol Mall, Suite 300
Sacramento, CA 95812

Date: December 21, 2015
To: Ms. Stacy Wydra and Ms. Fran Ruger
From: The League to Save Lake Tahoe
Re: **Comments on Martis Valley West Parcel Specific Plan Draft Environmental Impact Report and Request for Recirculation**

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 Draft Environmental Impact Statement (DEIR). Due to the numerous insufficiencies and inadequacies of this DEIR, we feel strongly that it must be revised and recirculated. The League's comment letter details specifics as to why the DEIR is flawed. The League hereby incorporates and references the comment letter submitted on December 18, 2015 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 DEIR must be recirculated as required by the California Environmental Quality Act (CEQA). The associated comment letter contextualizes these and other issues related to the review:

- **Several cumulative impacts and mitigation portions of the assessment conclude that there will be significant impacts, but they are unavoidable so are dismissed. This reoccurring level of review is unjustifiable. A project cannot have several significant impacts without appropriate mitigation.**
- **DEIR ignored the cumulative impacts from an adjacent proposed project (Brockway) and potential impacts to the Lake Tahoe Basin impacts. It also ignored regional planning requirements of the Tahoe Regional Planning Agency (TRPA) Bi-State Compact and Regional Plan Update.**
- **DEIR does not assess potential environmental impacts because it arbitrarily assumes a "project site" and hypothetical development rights. These cannot substitute the need for a true environmental review.**
- **DEIR used arbitrary assumptions to deduce several "less than significant" impacts under land use and biological resources sections of the DEIR.**

- **The Specific Plan details using the Fibreboard Freeway as an emergency access route for the development project. This is the only point of access for Brockway. This will be incredibly problematic in the case of an emergency.**
- **Wildfire threats were not adequately analyzed or appropriately mitigated.**
- **DEIR lacks coordination efforts with TRPA and Caltrans. Both of these agencies will be negatively impacted by the Specific Plan project.**
- **Traffic analysis discrepancies between Specific Plan and Squaw Valley DEIRs when they are in the same geographical location and both analyzed by Ascent Environmental call for recirculation.**
- **Surveys are not included for both wildlife and plant species for actual potential impacts assessments.**

For these reasons and the others discussed in the comment letter, the League requests that the DEIR be revised and recirculated addressing all of the League, Sierra Watch, and Mountain Area Preservation concerns.

Sincerely,
Darcie Collins, PhD
Executive Director
League to Save Lake Tahoe

Enclosures

2015.12.21 League to Save Lake Tahoe Comments on Martis Specific Plan DEIR
2015.9.17 League to Save Lake Tahoe Comments on Brockway Campground