



Stacy Wydra  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
RE: State Clearinghouse #2014032087

December 18, 2015

Dear Ms. Wydra:

Attached please find our comment letter prepared by the firm of *Shute, Mihaly & Weinberger* on the Draft Environmental Impact Report (DEIR) prepared for the Martis Valley West Parcel Project and Specific Plan (MVWP/SP).

Both Mountain Area Preservation and Sierra Watch maintain a long-term commitment to lasting conservation and good planning in Martis Valley. The MVWP and the Draft EIR, however, would represent a major step backward in the ongoing, collaborative effort to secure a better blueprint for the region.

The 7,568-acre SPI property stands as the last remaining piece of the planning puzzle in Martis Valley. Current proposals essentially divide the project into two pieces:

- The Eastside of Highway 267, where there is a clear consensus for permanent conservation – and now development – as reflected in the MVWP proposal; and
- The Westside of Highway 267, where proponents seek broad entitlements, in two different applications, for the MVWP and the Brockway Campground.

We applaud the ongoing commitment to protect the Eastside of the SPI property. But, as spelled out in our attached letter, inadequate review of the MVWP proposal itself, coupled with the attempt to divide the rest of the property into a piecemeal planning proposal with two different projects, runs counter to the letter of state law and will threaten over-development.

It is our hope that, through ongoing dialogue and effective planning, we can work together to help create an outcome that not only meets the standards of state law but, also, ensures appropriate land use development and priority conservation, worthy of the Martis Valley, Lake Tahoe, and the SPI property itself.

Our attached letter from *Shute, Mihaly & Weinberger* outlines numerous deficiencies within the MVWP Draft EIR, warranting the need to re-analyze and re-circulate CEQA specific chapters for adequacy under state law. The following items are a few of the areas of concern where more examination is necessary for CEQA compliance:

- Project description improperly segments proposed development in the Lake Tahoe Basin Portion of the MVWP
- DEIR ignores CEQA mandated cumulative impact analysis for future foreseeable projects such as the Brockway Campground proposal
- DEIR assumes no biological impacts with the Westside parcel, due to the conservation of the Eastside parcel
- DEIR defers analysis and feasible mitigation measures for biological resources to the time of project construction
- DEIR fails to adequately analyze or mitigate significant visual impacts to the Martis Valley & Lake Tahoe Basin viewshed
- DEIR fails to analyze or mitigate significant traffic & circulation impacts i.e.
  - Winter trip generation is inaccurate & summer trip traffic is not identified
  - Projects overall trip traffic generation is underestimated
  - Level of Service for Project access entrance & SR 267 not identified correctly as a significant impact
  - Regional traffic impacts to Interstate-80 not analyzed
  - Impacts to public transportation not analyzed or mitigated
  - Impacts to public safety not identified or analyzed
  - No analysis of construction related traffic impacts
  - Cumulative traffic impacts not analyzed nor mitigated
  - Flaws in air quality & green house gas emission analysis due to errors in traffic analysis
- DEIR fails to evaluate the project's contribution to climate change, underestimates the projects green house gas emissions & fails to evaluate feasible mitigation
- DEIR fails to analyze or mitigate hazards for wildfire and emergency evacuation
- DEIR does not account for on-going drought & climate change in California
- DEIR does not analyze or mitigate impacts to hydrology and water quality
- DEIR analysis of project alternatives is inadequate

With these CEQA issues and additional deficiencies within the DEIR we respectfully request the County and applicant to revise and re-circulate the DEIR with adequate analysis and feasible mitigation measures. Thank you for the opportunity to comment on the MVWP DEIR/SP. If you have questions concerning any of the items presented in our *Shute, Mihaly & Weinberger* letter and exhibits please feel free to contact us.

Sincerely,



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