



Placer County
Environmental Coordination Services, Community Development Resource Agency
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cdraecs@placer.ca.gov

Date: March 24, 2015
To: Mr. Michael Johnson, AICP
From: The League to Save Lake Tahoe

Re: Comments on Revised NOP of an EIR for the Proposed Martis Valley West Parcel Specific Plan Project

Dear Mr. Johnson,

The League to Save Lake Tahoe thanks you for reissuing a revised Notice of Preparation (NOP) for the proposed Martis Valley West Parcel Specific Plan (Specific Plan) and associated Environmental Impact Report (EIR). While the project applicant has removed the proposal for any development within the Lake Tahoe Basin, the League is concerned with the potential impacts to the Lake Tahoe environment. The following comments must be part of the assessment in the EIR:

- **Scenic Impacts to Basin Associated with Ridgeline Development**
- **Increase in Traffic and Associated Impacts to Basin Must Be Analyzed**
- **Use of Fibreboard Freeway and Associated Coverage Need Clarification**
- **Clarification Needed of Limited Conservation on East Parcel**

Background

This newly issued NOP comes after months of discussion with different stakeholders relating to the Specific Plan. The applicants had originally released a proposal that would allow for development in both Martis Valley subject to Placer County approval and a 112.8 acre area in the Lake Tahoe Basin that would have been subjected to Tahoe Regional Planning Agency (TRPA) approval. The applicants have now removed the 112.8 acre portion within the Lake Tahoe Basin and are only seeking Placer County approval. The development would only occur on what is called the West Parcel. The Specific Plan is associated with a critical component that will conserve 670 acres on an East Parcel. This conservation is still part of the new proposal.

The new proposal, however, does not change the actual amount of proposed development. The 760 dwelling units, associated homeowner amenities (22,000 square feet), and commercial square footage and acreage (34,500 square feet and 6.6 acres) associated with the originally proposed development including

the 112.8 Basin acres will now all shift into Martis Valley.¹ While this development has been moved out of the Lake Tahoe Basin, it has dramatically increased the amount of proposed development in Placer County and may still have serious impacts to the environment within Lake Tahoe. One of the project objectives listed is to consider regional implications of development in the Martis Valley on resources outside of the Valley (i.e. Lake Tahoe Basin)². These impacts will need to be vetted through the EIR process.

Scenic Impacts Associated with the Ridgeline Development of the Specific Plan

The development associated with the Specific Plan will create scenic impacts to the Lake Tahoe Basin. The TRPA has strict scenic guidelines for development within Lake Tahoe and required mitigation. While the Specific Plan development will be outside of the actual geography of the Lake Tahoe Basin, it will be seen from the lake itself and various view corridors. The development will sit on top of a ridgeline that abuts the Lake Tahoe Basin. Impacts associated with the development and glare in nighttime skies must be examined. There must be an appropriate simulation for this type of analysis. The balloon analysis that had been conducted earlier for the previous proposal cannot suffice for the dramatic change of development that has not been pushed onto the ridgeline of Martis Valley.

Increase in Traffic and Associated Impacts to Basin must Be Analyzed

The Specific Plan will likely increase traffic and vehicle miles travelled (VMTs) in the Lake Tahoe Basin. To accommodate the Specific Plan proposal, changes will be made to State Route 267 (SR 267). This is the only access site to the development site. A new three-legged intersection to SR 267 and two-lane main access road from SR 267 would be constructed as part of the Specific Plan.³ The development, improvements made to SR 267, and proximity to Lake Tahoe will likely increase the amount of traffic and overall VMTs in the Lake Tahoe Basin. The nearest amenities are in Kings Beach, California. It is a natural deduction that traffic impacts will increase with the Specific Plan. These impacts and associated mitigation measures will need to be addressed in the EIR.

Use of Fibreboard Freeway and Associate Coverage

There must an explanation of use and any need of coverage for the Fibreboard Freeway. The NOP points out that this would be a paved road and would only be used for emergency vehicle access. This road currently sits within the Lake Tahoe Basin and is below the Specific Plan site. Coverage is another TRPA requirement. The amount of coverage needed to pave the road and associated impacts should be assessed in the EIR. Impacts associated with the use of this road must also be analyzed. While it is listed as only an emergency access in the NOP, there are not any clear parameters of how this will be enforced. Allowing for a paved road will open the door for future development in the Lake Tahoe Basin outside of the Specific Plan. There must be enforcement of how this road will only be used for emergency access. Traffic associated with the potential use of this road must be included in the EIR.

¹ Revised NOP of an EIR for the Proposed Martis Valley West Parcel Specific Plan Project. February 27, 2015. Pg. 1.

² Revised NOP of an EIR for the Proposed Martis Valley West Parcel Specific Plan Project. February 27, 2015. Pg. 7.

³ Revised NOP of an EIR for the Proposed Martis Valley West Parcel Specific Plan Project. February 27, 2015. Pg. 10.

Clarification Needed of Limited Conservation on East Parcel

A major component to the Specific Plan is the associated conservation easement on the East Parcel. This is an integral piece to the overall project. The NOP states, "...a limited conservation easement would be placed over the entire 6,376 acres, or it would be sold fee simple to conservation groups.⁴" What this means and how it is defined must also be examined in the EIR.

Recommendations

The impacts to the Lake Tahoe Basin associated with the Specific Plan will need to be analyzed in the EIR. The League recommends;

- **Scenic impacts associated with the ridgeline development be fully analyzed which would include a nighttime skies analysis;**
- **Traffic impacts associated with increase in VMTs and appropriate mitigation measures be assessed;**
- **The use and coverage associated with the Fibreboard Freeway be clarified;**
- **The definitely of the limited conservation easement to the East Parcel be discussed in the EIR.**

Sincerely,
Shannon Eckmeyer
Policy Analyst
League to Save Lake Tahoe

⁴ Revised NOP of an EIR for the Proposed Martis Valley West Parcel Specific Plan Project. February 27, 2015. Pg. 2.