



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,ⁱ 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.

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.**

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.

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.

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.

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 MVWSP 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.

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

ⁱ 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.