

DAS TARGET

HIGHLANDS VLEN RD

RIDGE
SPR

COMMERCIAL

RIDGE

TIDE BASIN
BOUNDARY

BROCKWAY
CLUBGROUND

500 SITES
870K SF COVERAGE

MUN

Brockway Clubground

EXHIBIT 1

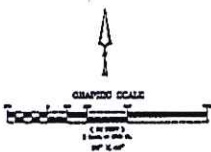
120° 06' 00"

120° 04' 00"

EDD D... A... C... 1



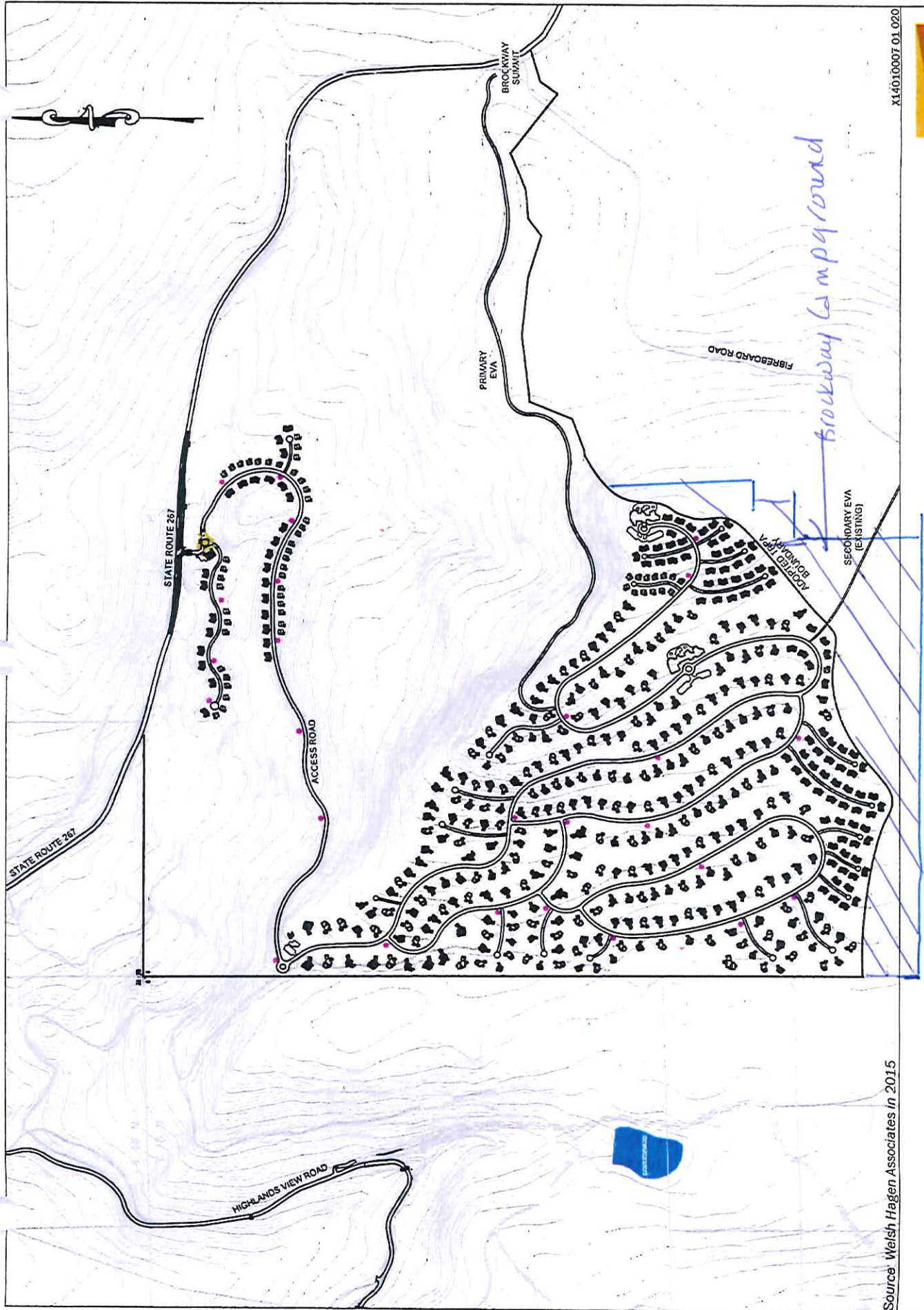
**MVCP - DEVELOPMENT LAND
1,360 UNIT CONCEPT PLAN**



Legend	
Total Land	6,800± acres
Development Land	660± acres
Proposed Townhomes <i>(164 detached)</i>	828 units
Proposed Single Family Lots	532 units
MVCP Approved Residential	1,360 units
MVCP Approved Commercial	6.6 acres



EXHIBIT 2



X14010007 01_020



Conceptual Site Plan Used to Simulate Buildout of the Project Site
EXHIBIT 3

Source: Welsh Hagen Associates In 2015

Exhibit 9-26

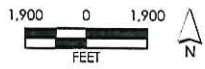
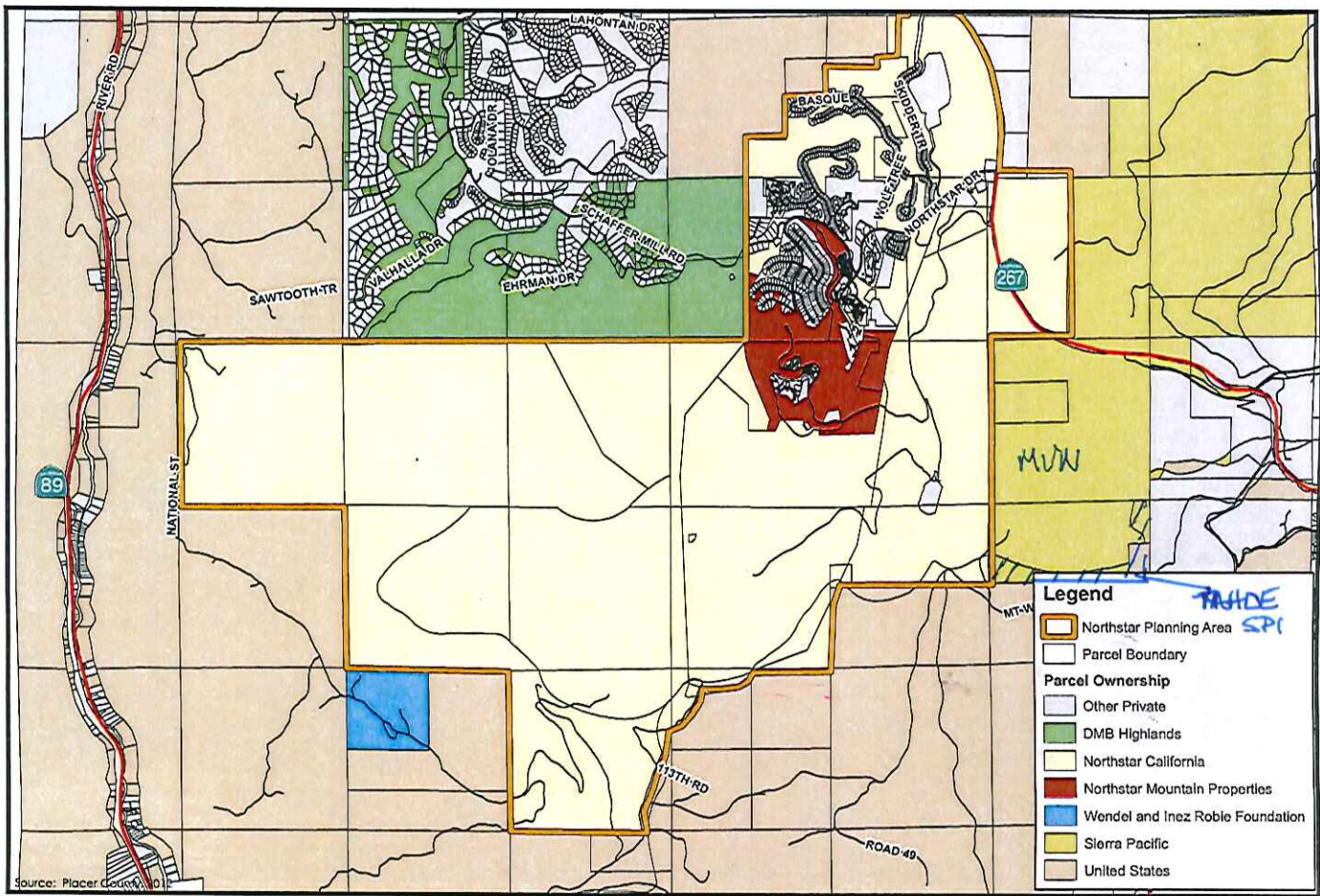


EXHIBIT 4

Figure 3-4
Existing Parcels and Ownership



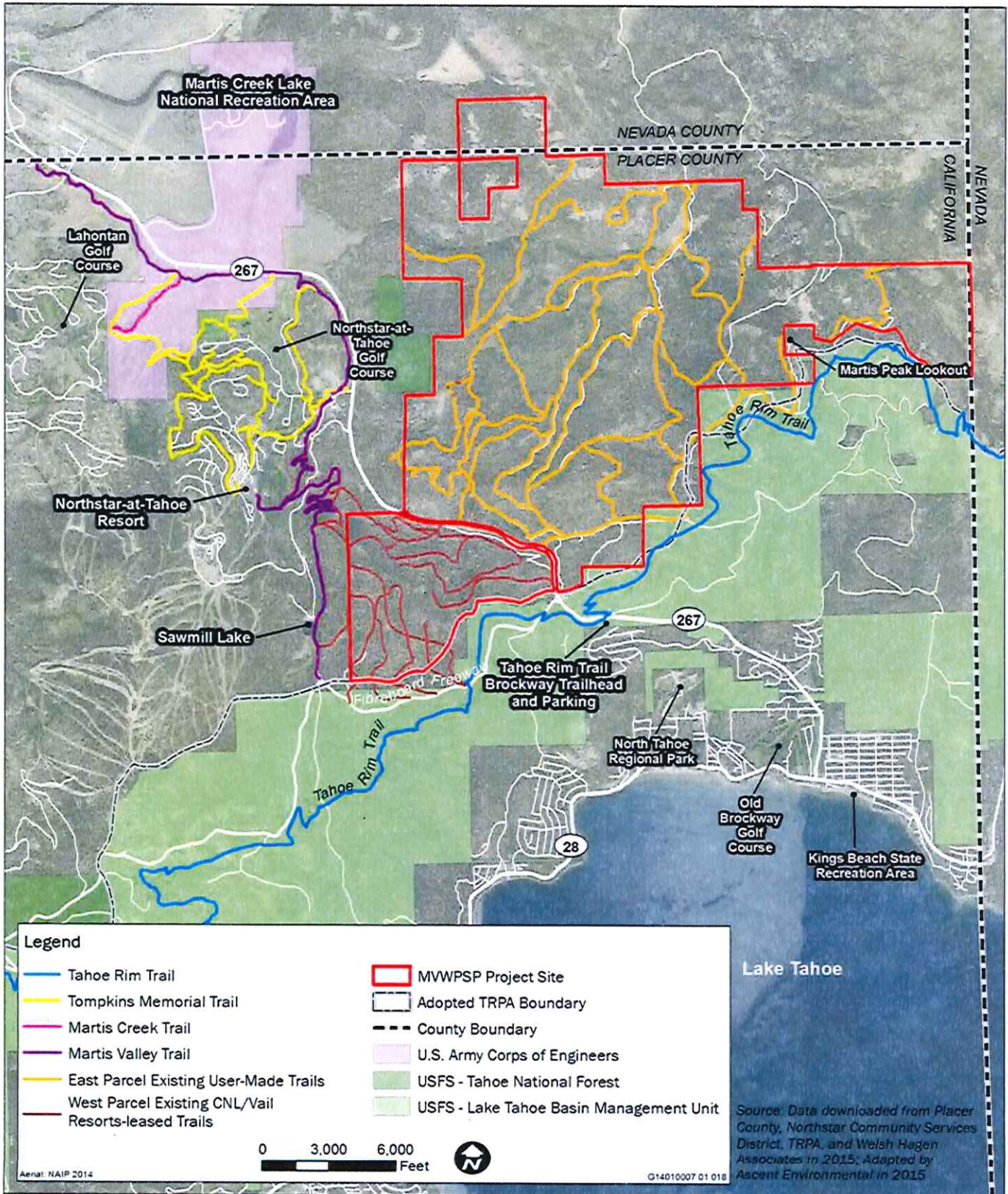


Exhibit 17-1

Existing Trails and Recreation Areas

EXHIBIT 5





X14010007 01 020



Conceptual Site Plan Used to Simulate Buildout of the Project Site

Exhibit 9-26

Source: Welsh Hagen Associates in 2015

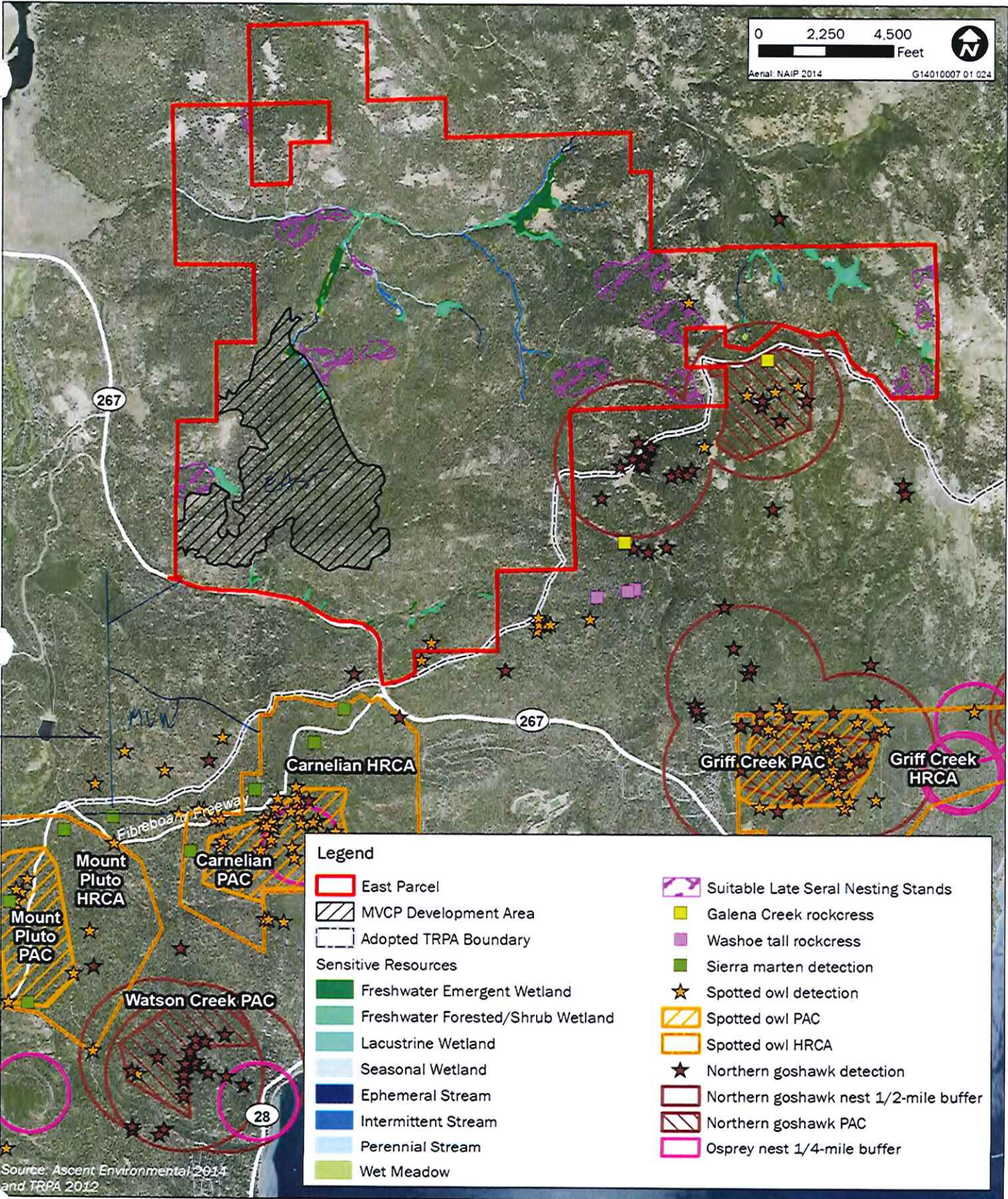
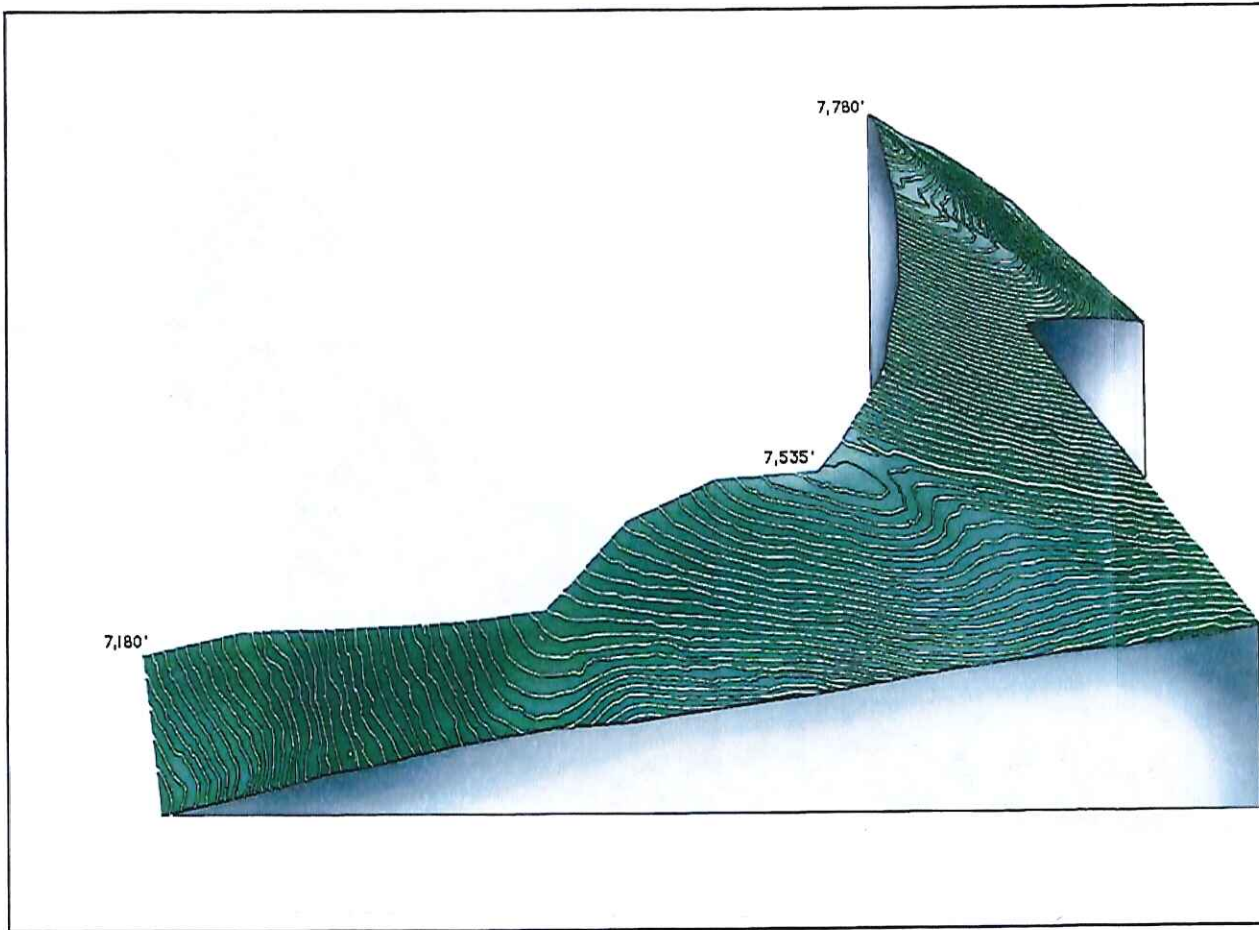


Exhibit 7-2b

Known Sensitive Biological Resources – East Parcel

EXHIBIT 7

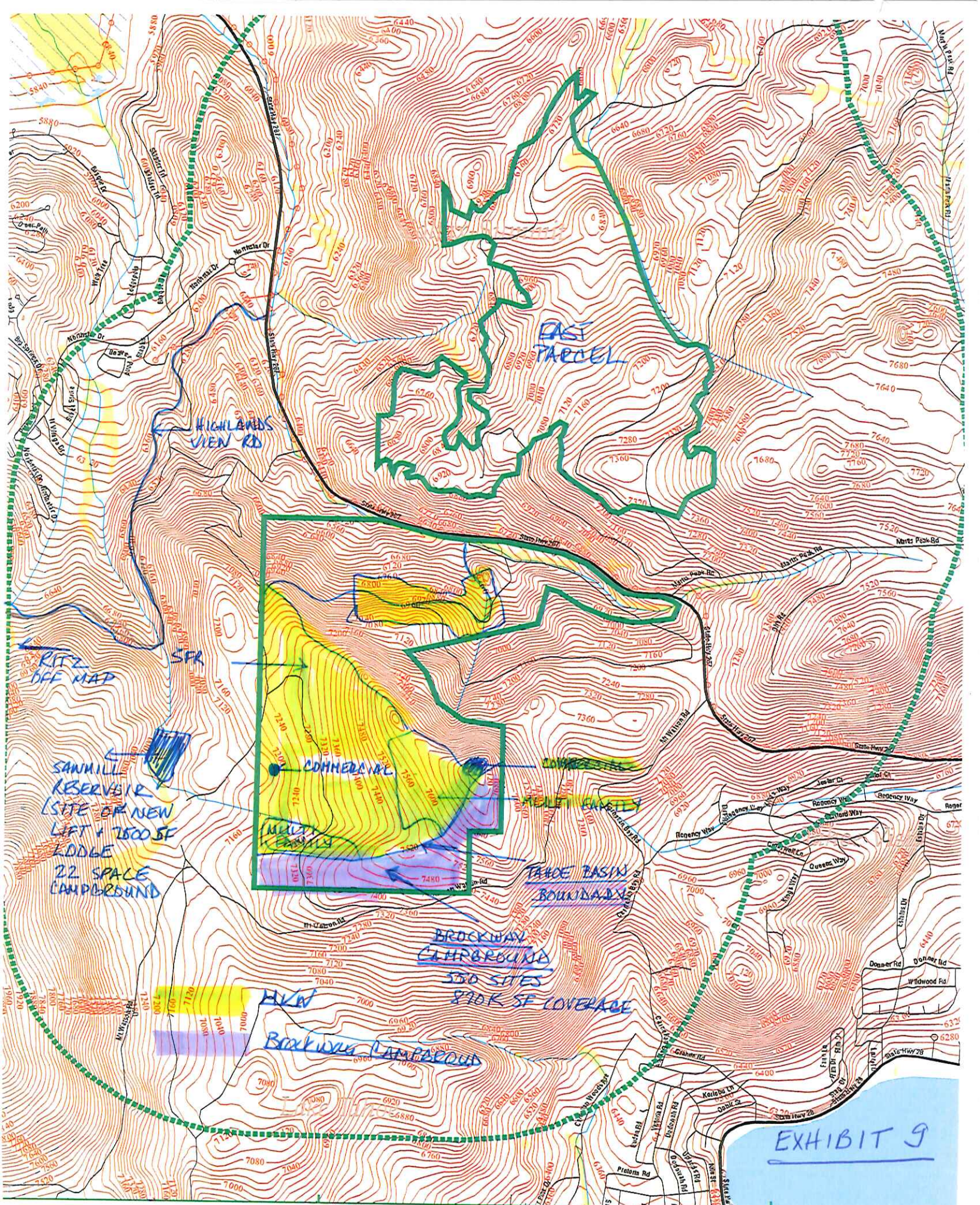




BROCKWAY CAMPGROUND FLACER COUNTY, CALIFORNIA	
SIERRA PACIFIC INDUSTRIES PO BOX 60228 REDWOOD, CA (530) 734-8600	
FOUR STATE CONSULTING GROUP	
10 S Main St #201 Yuba, CA 95455 (209) 787-5011	
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PRELIMINARY NOT FOR CONSTRUCTION	
TERRAIN ANALYSIS	
Client:	OSIEM
Drawn by:	JC
Checked by:	BS
Date:	N.Y.S.
Scale:	JULY 2015
2 OF 3	

EXHIBIT 8

*Brockway Campground
 Terrain Analysis*



HIGHLANDS VIEN RD

EAST PARCEL

RITZ OFF MAP

SANMILL RESERVOIR
(SITE OF NEW
LIFT + 2500 SF
LODGE
22 SPACE
CAMPGROUND

COMMERCIAL

MULTI-PURPOSE

TANOE BASIN
BOUNDARY

BROCKWAY
CAMPGROUND

500 SITES
870K SF COVERAGE

HVN

Brockway Campground

EXHIBIT 9

120° 06' 00"

120° 04' 00"

Another good lake view from interior at 75ft

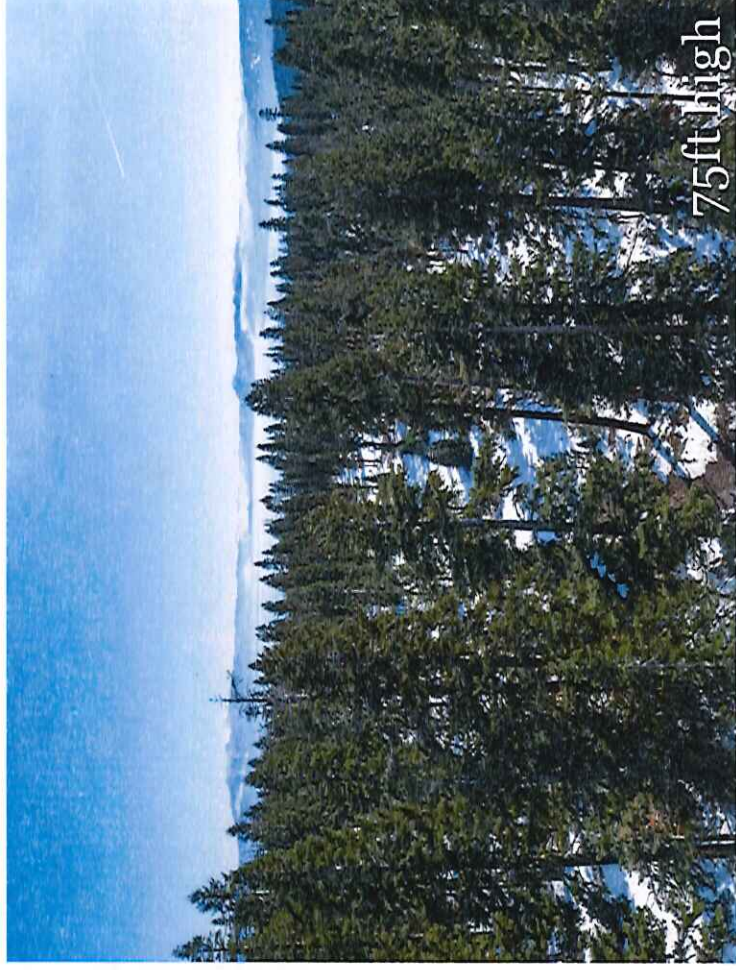


EXHIBIT 10a

Slope to lake clearly shown, arrow designates commercial location.

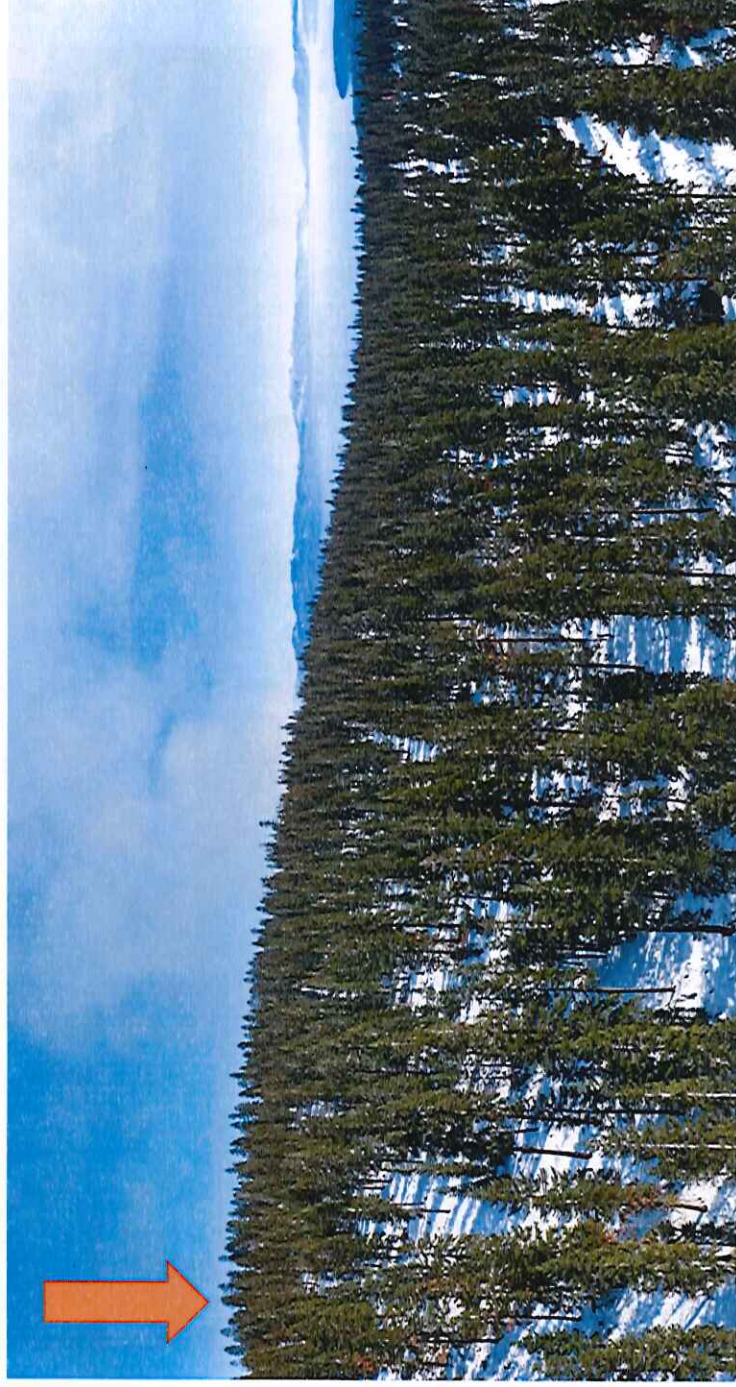
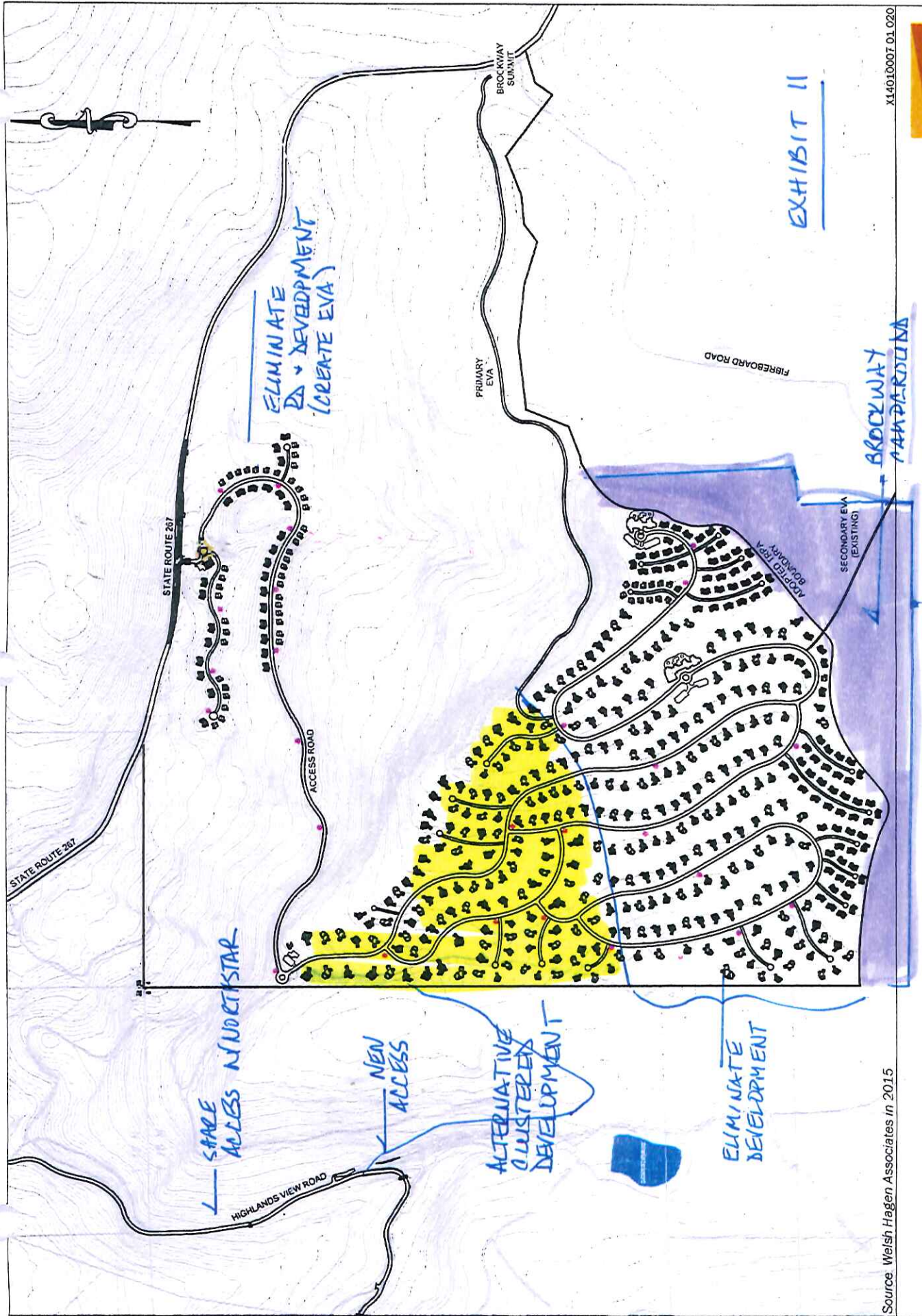


EXHIBIT 10b



COMMENTS ON MARTIS VALLEY WEST DEIR

Joy Dahlgren 12/20/15

TRANSPORTATION SECTION COMMENTS

10.1.1 Existing Study Area

The study area is limited to SR 267 between I-80 on the north and SR 28 on the south. This is far too limited, because it ignores the effects of additional travel generated by the MVWP project on the two highways it connects and the areas through which they pass. Many project-generated trips would affect these roads. According to the DEIR, in the summer 35% of trips either begin or end on I-80 and another 35% begin or end on SR 28. In the winter 39% begin or end on I-80 and 30% on SR 28. The EIR should, but does not, say what proportion are between I-80 and SR 28 without a stop on SR 267.

The effects of trips generated by the MVWP on both I-80 and SR 28 should be analyzed because both become congested on peak weekends. And the more congested they are, the more delay is caused by each additional vehicle added to the congestion. Each car traveling to or from the project that enters such a congested area will delay all following cars. This can result in significant delay given the high traffic volumes on I-80—Caltrans estimated an annual daily average of 34,500 vehicles per day in 2014 east of the intersection with State Route 89 in Truckee. The delay is not just an inconvenience to travelers; it increases fuel consumption and thus global warming as well as emissions of pollutants that reduce air quality region-wide.

Therefore, the effects of the project on traffic and vehicle emissions on I-80 and Kings Beach and elsewhere on Lake Tahoe should be considered.

10.1.2 Study Periods and 10.1.3 Traffic Data Collection

The DEIR methodology for obtaining winter peak traffic movements appears problematic. The DEIR did traffic counts on Sunday, March 9, 2014 and then applied a factor to approximate the 30th highest winter peak hour volume, which it claims to be the standard for transportation facility design. The problems are that the DEIR is not related to *facility design*, but to the *impacts of increased facility use*. Furthermore, the 30th highest peak hour might make sense when the peak hour is likely to be a weekday, but not when it is a weekend day, because there are only 8-10 weekend days per month. The DEIR provides no detail on when the 30th highest peak hour occurred.

The use of a factor (based on Caltrans data) to estimate traffic movements also poses problems. Because the movements in each direction at an intersection are often dependent on movements in other directions even when the intersection is signalized, it is not clear that

applying a factor to observed movements would result in actual peak period movements. The DEIR does not provide enough detail regarding how the factor was derived or how it was applied.

Actual measurements on a Sunday in January or February should be used.

10.3.2 Methods and Assumptions

The DEIR methodology for estimating trips resulting from the project makes little sense. It assumes that 80% of the Single Family Homes and Town Homes are second homes and then applies a different and inappropriate trip generation rate to all of them. But the number of trips generated depends not on the proportion that are second homes but on the proportion that are occupied during peak periods.

The DEIR classifies second homes as Recreational Homes, a classification that assumes that much of their activity takes place within the recreational homes community. But the second homes are located in the same community as the full-time residences. When occupied, their travel (trip generation rates) should be the same as full-time residences.

To be more accurate, the trip generation rate for the particular type of residence, multiplied by the number of that type residence occupied during the peak period should be used.

The EIR should name the information sources and method used to assign the projected trips to the various origins and destinations. The DEIR contains no data on origin and destination pairs, so it is impossible to confirm that the traffic movements match the number of peak trips estimated.

10.3.4 Impacts and Mitigation Measures

Impacts on Intersection Operations

According to the DEIR even if there were no other development in the area, the project would result in "Significant" impacts on intersections in the area. (Table 10-12).

The I-80 westbound ramps would degrade from LOS E to LOS F in the winter peak. The intersection of SR 267 with Schaffer Mill Road and the Truckee Airport Road would also degrade from LOS E to LOS F. Traffic on Highlands View Road would degrade from LOS E to LOS F.

The DEIR says that delay on Highlands View Road can be reduced to "less than significant" levels by directing traffic to Northstar Drive, which has a traffic light and less delay.

The DEIR suggests that delay at the other two intersections could be reduced by optimizing signal timing, but gives no evidence that this would be possible, implying that it could be if Caltrans were willing. But why wouldn't Caltrans be willing if it were possible? The DEIR rates these impacts "significant and unavoidable".

Impacts on Roadway Segments

All 5 of the roadway segments not in the town of Truckee would be degraded to LOS E, from current LOS E or D in both summer and winter peaks. Although the project would pay over \$3 million in impact fees, this is nowhere near the cost of widening SR 267 or improving the intersections. Thus, these impacts are "significant and unavoidable".

10.3.5 Cumulative Conditions--Impacts

The effects of the project are much greater when other development that is either already approved or is likely, is taken into account: delays of over 3 minutes during winter and summer peaks at the intersections of SR 267 and Brockway Road and Schaffer Mill Road, delays of over 2 minutes at the I-80 ramps in the winter peak, delays of about a minute at the project access road in winter and summer, and most road segments operating at LOS F in both summer and winter peaks.

Mitigation Measures

The DEIR says that the following improvements would reduce traffic impacts to less-than-significant levels (pages 10-41,42). Each is followed by an estimated cost and year of completion from Caltrans Transportation Corridor Concept Report, State Route 267 (2012).

1. Construction of a two-lane roundabout at the SR 267/I-80 westbound ramp intersection
\$3,500,000 – 2030
2. Construction of a two-lane roundabout at the SR 267/I-80 eastbound ramp intersection
\$3,100,000 – 2030
3. Construction of a two-lane roundabout or equivalent improvement at the Brockway Road/Soaring Road intersection with SR 267
4. Construction of a two-lane roundabout or widening of SR 267 at its intersection with Schaffer Mill Road and Truckee Airport Road
5. Widening SR 267 to 4 lanes between the county line and Brockway summit \$10,000,000 – 2035 (The DEIR shows a Placer County estimated cost of \$32,433,700 --pg 31)

The project would pay a traffic impact fee of \$3,685,511 to Placer County. Obviously, paying a fee for roadway improvements mitigates nothing unless the fees and other funding sources are sufficient to fully fund the improvements. And the completion dates of the planned projects are far in the future.

A Mitigation Measures not Considered in the DEIR

Both intersection and road segment delay could be reduced during peak travel hours in the winter by reducing peak ski traffic to and from Northstar from the north. Although Northstar already provides bus service between resorts and the ski area, and TART provides bus service, automobile travel might be further reduced by establishing remote parking lots in Truckee and the north shore of Tahoe with frequent bus shuttles to and from the ski area during the peak.

GENERAL COMMENTS

The Scope of the DEIR is Too Limited Geographically

The DEIR finds that the relatively small amount of travel generated by the MVWP development would cause significant delays to all travelers on SR 267. It is the nature of delay that as a facility becomes more crowded, 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 the bottleneck increases, thus taking each car longer to get through. The effects of the MVWP project on traffic will also be experienced elsewhere in Placer County, on I-80 and in the Tahoe basin.

Relationship of Martis Valley to Lake Tahoe

The Tahoe Regional Planning Agency has a policy of discouraging housing in sensitive environmental zones and areas far from activity centers. The purpose is to preserve the Lake Tahoe environment by minimizing the effects of human activity on the environment. Although the Martis Valley West Parcel is not under TRPA's jurisdiction, it is much closer to Lake Tahoe than to Truckee. Thus any development there would have an effect on Lake Tahoe, especially in the summer when water activities at Lake Tahoe would attract MVWP residents and visitors.

Therefore, if Placer County wants to preserve Lake Tahoe, it should pay attention to the area around it, even outside its watershed. Too much building, too much forest depletion, and too much traffic around the Tahoe basin could damage the environment that makes Lake Tahoe so attractive.

The DEIR's transportation section should analyze the effect of development of the Martis Valley West Parcel on Lake Tahoe's environment.

Relationship of the proposed Brockway Campground to MWVP

The proposed campground has the same owner as the MWVP. Why are two practically adjacent projects not included in the same EIR? The 550 site campground would be accessed via the Fibreboard Freeway which intersects SR 267 at the Brockway summit. Most traffic to and from the campground would likely move between it and Tahoe, but some traffic would move between it and Truckee. The effects of campground traffic on peak summer travel times should be assessed along with the effects of MWVP traffic.

Project Alternatives

The DEIR states clearly that the No-Project Alternative is the *environmentally superior alternative*. Among the other alternatives, Alternative 3 is environmentally superior. It would generate far fewer trips—43% fewer daily trips. Without providing any traffic analysis of this alternative, the DEIR claims that its transportation impacts would be significant and unavoidable. This is hard to believe. A traffic analysis supporting this contention should be presented in the EIR.

Alternatives 2 and 4 would increase transportation impacts.

Another alternative that should be considered in the EIR is constructing the proposed Brockway campground on the MVWP instead. The 550 campsites would have less impact than 760 housing units, and, if fully utilized, would serve more visitors than would the currently planned MVWP project, which assumes 140 full time residences and only 520 residences for visitors.

SHOULD A PROJECT WITH SIGNIFICANT UNAVOIDABLE NEGATIVE IMPACTS BE APPROVED?

The more relevant question is “should a project be approved if the benefits of the project are less than its costs?” A proxy for the *benefits* is what people are willing to pay for the components of the development. There is no simple proxy for the *costs*, and they are generally not thought of in monetary terms. What is the value of one minute of delay? Maybe not much until it is added to another minute of delay and another and another. Lost is not only the time, but the feeling of freedom that people associate with mountain open space. One is not escaping urban pressures, but finding new pressures where one goes to get away. What are the costs of the diminished air quality, reducing wild life habitat, increased global warming, and increased erosion?

Turning the question around, should the environment and access and movement in the Martis Valley and its surrounding area be degraded in order to provide 760 additional dwelling units in the area? Especially, if 80% will be second homes?

I think not. Maintaining and growing the forest makes sense from a carbon sequestration point of view. It also makes sense from a long term economic and recreational point of view.

Thank you for your consideration.

Sincerely,

Joy Dahlgren

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(415) 464 7930

429 Gonowabie Road
Crystal Bay, NV 89409

Credentials

I have 25 years of experience in transportation, as an analyst for a consulting firm specializing in freight operations, as a planner for the Golden Gate Bridge, Highway and Transportation District, and as a research engineer with the Institute of Transportation Studies at the University of California, Berkeley.

I have an AB in Statistics, an MPP in Public Policy, and a PhD in Civil Engineering, all from the University of California at Berkeley.

My family and I have owned property in Crystal Bay at Lake Tahoe since 1950, and I have visited the area regularly ever since then.