



December 14, 2015

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

RE: NTPUD Comments: Martis Valley West Parcel Specific Plan Project (State Clearinghouse No. 2014032087)

Item 1: Review of the above referenced project's Draft Environmental Impact Report (EIR) indicates development is not proposed within the Lake Tahoe Basin. Although this is stated in numerous locations throughout the body of the document, Attachment N: Water Supply Assessment (WSA), conflicts with this project description.

Quotes therein EIR Attachment N (WSA):

- "The 1,192-acre West Parcel has a development area of approximately 775 acres, of which 112.8 acres are located within the Lake Tahoe Basin" (memo pg. 1 of 17).
- "A portion of the project lies within the Tahoe Basin...as noted in TROA, developments within the Tahoe Basin must be served by water sources from within the Tahoe Basin. Accordingly, Project developments within the Tahoe Basin will be served by a to-be-determined source within the Tahoe Basin. This WSA specifically excludes water demands for development occurring within the Tahoe Basin...and recognizing that about 10% will actually be supplied by a water source within the Tahoe Basin." (memo pg. 8 of 17)

NTPUD Comment 1 (relative to Item 1 above): Please clarify if development is proposed, or not, within the Tahoe Basin. If, per WSA, development is proposed within basin, EIR shall analyze and review: proposed water demands, supply assessments, and supply source(s) for project elements proposed within Tahoe Basin.

Item 2: Review of the above referenced project's Draft EIR proposes a potential water supply source coming from the development of wells on the West Parcel. It is acknowledged that due to the nature of the West Parcel's subsurface geology this tapped aquifer would be more sensitive to extraction and is not currently well understood. The EIR further states if this source is ultimately proposed, it will be fully modeled to determine sustainable pumping rates able to support the project. In addition to a detailed model, if tapped, the surface and groundwater resources within the project area will be monitored to ensure sustainable extraction.

Quotes therein EIR Table 2-1:

- "A second option for water supply for the MVWPSP development would be the installation of groundwater wells on the West Parcel...they would penetrate moderate permeability volcanic rock aquifers more typical of mountainous terrain. These aquifers

have limited storage capacity and are more sensitive to pumping and climatic fluctuations. The groundwater recharge rates and surface/groundwater interactions within the West Parcel, specifically, are not well understood.”

- “The GSFLOW model uses a hydrologic framework specific to the Martis Valley, and shall be used to determine potential groundwater recharge rates for the West Parcel and to develop a calibrated water budget for the MVWPSP project.”
- “The modeling results shall be used to estimate the quantity of groundwater that can be sustainably extracted from aquifers beneath the West Parcel.”
- “The project applicant and NCSD shall develop a long-term monitoring program for the surface and groundwater resources within the West Parcel. The goal of the monitoring plan will be to detect and assess long-term changes and trends...and to provide reasonable assurance of long-term pumping at sustainable rates.”

NTPUD Comment 2 (relative to Item 2 above): Should this second option be explored further, the model shall fully address all ground and surface water areas which may be potentially affected by these new wells. These areas shall include all areas adjacent to the West Parcel (including those inside the Lake Tahoe basin) if potential affect determined so by the model. By pure definition, the meaning of “sustainable” includes that which can maintain its own viability without impacting outside (or adjacent) parties. The model shall indicate this is the case.

NTPUD Comment 3 (relative to Item 2 above): Regardless of model results, if this second option is exercised and results of the long-term monitoring plan exposes these wells are not extracting at a sustainable rate (and therefore are affecting outside areas), the production of these well shall be reduced as required to be within a sustainable amount. This requirement shall be included in the proposed development’s Conditions, Covenants, and Restrictions (CC&Rs).

Item 3: Section 17.1.1 identifies North Tahoe Area Beaches and North Tahoe Regional Park as existing park and recreation amenities that will serve this development.

NTPUD Comment 4 (relative to Item 3 above): The discussion of Impact 17-1 finds no significant impact to existing recreational facilities, but provides no identification of how the project will mitigate impacts to Tahoe Beaches and North Tahoe Regional Park from the influx of users generated by this 760 unit residential development. The Final EIR should discuss how the Project will mitigate impacts specifically to North Tahoe Regional Park and North Tahoe Area Beaches.

Please feel free to contact me at any time if you have any questions on the above comments.

Sincerely,



Duane Whitelaw
General Manager/Chief Executive Officer

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