

June 26, 2024

Tahoe Regional Planning Agency
Paul Nielsen, John Marshall, Julie Regan
Submitted via email

Re: Homewood Mountain Resort Proposed 2024 Master Plan Revision

TRPA staff,

The League to Save Lake Tahoe (League) appreciates the opportunity to provide comments on the Homewood Mountain Resort (HMR) Proposed 2024 Master Plan Revision (Proposal).

The League is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we advocate for the implementation of policies contained within regional land use and planning documents, including the Bi-State Compact, the 2012 Regional Plan Update (RPU), the Regional Transportation Plan (RTP), and various Tahoe Basin Area Plans. In connection with our mission, we review project and plan proposals to ensure consistency with other plans and conformance with environmental rules and regulations.

The League was a key stakeholder in the years leading up to the 2011 Homewood Ski Area Master Plan (FEIR/FEIS Alternative 1A) and the 2014 settlement. The League has reviewed the documents submitted for the current Proposal for consistency with the 2011/2014 Master Plan and adequacy of the environmental review (Initial Environmental Checklist – IEC).

To be consistent with the 2011/2014 Master Plan and adequately identify and offset any environmental impacts from the new Proposal, the League requests that additional potential transportation impacts be analyzed, sediment reduction calculations be verified, and measures to offset transportation impacts that are used in the transportation impact analysis are required through permit conditions and/or a development agreement.

Additional Transportation Analysis

While the analysis conducted (HMR 2024 Trip Gen Parking VMT Memo or “VMT Memo”) is largely realistic and generally uses appropriate trip rates and reductions, there is one trip rate that should be reconsidered, and two additional analyses required to ensure impacts are fully analyzed and appropriate measures are included to offset any impacts from the Proposal.

Trip Rates: In Tables F and G in the VMT Memo, low-rise multifamily and single family detached ITE trip rates are used for units that are not full-time residences. *We suggest using the Hotel (310) trip rate for all units, or a similar trip rate, which more realistically reflects the actual planned use.*

Winter: *In order to fully estimate the transportation impacts from the Proposal, the change in visitor demographics must be analyzed.* The transportation analysis must include an estimated shift in day skiers that live near Homewood Resort but due to pricing, parking, or day pass availability travel to other resorts in the Tahoe Region. This shift in use is identified in the IEC¹, but not analyzed in that document or the VMT Memo.

Summer: The “day skier food and beverage” (Table G in the VMT Memo), indicates that the food and beverage space could be open for special events. There is no indication of the number, type, or size of potential summer events. Without an analysis of, and commitment to, the number and timing of trips for special events, it is not possible to estimate impacts and plan appropriate offsetting measures. *A maximum number and size of events in the summer, along with allowable start and end times, must be established for analysis and mitigation; and that maximum must be included as a permit condition or as part of a development agreement.*

Sediment Reduction Calculations

Please explain how sediment reduction calculations were conducted. It is imperative that the project delivers the environmental improvements as planned. The League identified one high-level discrepancy that raises concerns about the accuracy of sediment reduction calculations: in the “MP Revision CEP Summary,” the EIP Conformance Element #1 states that HMR earned the Golden Eagle Award and Best in Basin Award in 2010 for its environmental achievements reducing 40 tons of sediment into to Lake Tahoe. HMR’s website states that the Best in Basin award was for reducing 60 tons of sediment.² This glaring discrepancy raises concern about the sediment reduction calculations included throughout the Proposal documents.

Permit conditions/development agreement requirements

Transportation measures that are included in the Project Description and/or used for analysis in the IEC and transportation analysis must be implemented for the proposed project to offset its environmental impacts as planned.

These transportation measures include but are not limited to:

- From the IEC: to offset the new vehicle trips and VMT, the approved 2011 Project includes an Alternative Transportation Plan (FEIR/EIS Section 3.5.20, page 3-44), including transit shelters, a bus and shuttle turnout, financial subsidies to increase public transit service to the site, employee shuttle services, car- and bike-share services onsite, a shuttle for guests, and other alternative transit amenities. Additional transportation strategies include: accommodate boat trailer parking during the summer at day skier parking facilities; day skier parking control (e.g., limit ticket sales so that parking does not exceed onsite supply); and Transportation Information Exchange (e.g., provide information on Tahoe City electronic sign board to notify day skiers when ski resort is at capacity).
- The MP Revision Project Narrative includes a more detailed list of the aspects of the Alternative Transportation Plan:
 - Extension of West Shore Bike Trail
 - Employee Shuttle Bus
 - Employee Public Bus Transit Fares
 - North Base-South Base Shuttle Service

¹ *Impact TRANS-1 on page 11-63:* “The Project will decrease winter vehicle trips and VMT primarily due to a predicted reduction in day use skiers – instead replacing a majority of day use ski visits with Homewood Resort residents or overnight visitors to the onsite lodging accommodations.”

² <https://www.skihomewood.com/mountain/environmental-achievements/>

- Free “Bicycle Share” Service Winter Program
- Skier Intercept Shuttle Program
- Winter West shore Dial-a-Ride Service³
- Summer West Shore Dial-A-Ride Service⁴
- Intercept Existing Vehicle Trips
- Summer Boat Trailer Parking in day use garage
- Day Skier Parking Control, surveying and monitoring
- DAR State Park Shuttle Service (Sugar Pine, DL Bliss and Emerald Bay)
- Transportation Information Signage at Tahoe City
- Continued funding of Regional Transportation Solutions critical EIP projects already completed and new unrealized EIPs identified in the FEIR/FEIS and CEP programs.
- From the VMT memo: HMR shuttle service is assumed to operate hourly 16 hours per day (7 AM to 11 PM) between Tahoe City and HMR, generating 2 vehicle-trips per hour and 32 per day.
- Also according to the VMT Memo, the “day skier food and beverage space is planned to close when skiing ends (by 5 PM). The daily trip rate was reduced by 41 percent based upon the observed hourly variation in trip generation for the “Fast Casual” land use on Saturdays, as reported in the appendices to the ITE Trip Generation 11th Edition to reflect that no trips will be generated after 5 PM.” *To ensure this is accurate, there must be a requirement (a permit condition or as part of a development agreement) for the winter food and beverage space to close by 5 pm for perpetuity.*
- Summer special events – as mentioned in our comments above, there must be a maximum number and size of events, and a mix of weekday and weekend events, created and added to the transportation analysis and enforced through permit conditions or a development agreement.

Thank you again for the opportunity to comment on this Proposal. With the additional analysis and inclusion of enforceable required transportation measures, the League believes that the environmental impacts of the Proposal will be consistent with the 2011/2014 Master Plan.

Please do not hesitate to contact me directly with any questions.

Sincerely,



Gavin Feiger
Policy Director
On behalf of the League to Save Lake Tahoe

³ VMT Memo: “Five vans are assumed to each make 2 roundtrips per peak hour. In other hours over a 10.5-hour day, two vans should be sufficient, indicating a total of 108 one-way vehicle trips per day.

⁴ *Ibid.*