

January 22, 2025

Tahoe Regional Planning Agency
Governing Board and Staff
Submitted via email

Governing Board Chair, Vice Chair, Members, and TRPA Staff -

Re: Agenda Item VI. Proposed Amendments to the Homewood Mountain Resort Ski Area
Master Plan & Proposed New Gondola

We appreciate the opportunity to provide comments on the Homewood Mountain Resort (HMR)
Proposed 2024 Master Plan Revision (Proposal).

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 is dedicated to protecting and restoring the environmental health, sustainability,
and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we review project
and plan proposals to ensure consistency with other plans and conformance with environmental
rules and regulations.

League staff 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). We commend the environmental improvements and protections
that have been maintained, and even enhanced, since the 2011 Master Plan approvals. This
includes SEZ restoration, forest fuels reduction, stormwater treatment improvements, and
further VMT reductions based on the most recent analysis and proposed permit conditions.¹

Monitoring, enforcement, and compliance to ensure that approved plans and projects fully
deliver the benefits they promise, is crucial. One of TRPA's fundamental roles is to create and
enforce consistent regulations across the Region.

We thank TRPA for ensuring Master Plan consistency, and for listening to the public, which
resulted in the enforceable Community Access Plan and Alternative Transportation Plan.² TRPA
should only approve projects and plans that they are able to ensure are implemented. In this
case, that entails the scope of the permit and the expressed ability for TRPA to use enforcement
mechanisms, including ordering HMR to cease operations, pursuing financial penalties and
injunctive relief, and revoking, suspending, or withholding permits. Enforcement will be based on
annual reporting of the type of tickets sold, and a more subjective evaluation: if TRPA interprets a
violation of intent to protect public access by Homewood or any future permit holder or owner,
they can regulate Homewood.

¹ Detailed in Appendix to this letter

² Detailed in Appendix to this letter

We commend Keep Homewood Public and many members of the public who have pushed Homewood and TRPA to do the right thing and ensure public access continues, consistent with the approved 2011 Master Plan.

We support environmental improvements at Homewood. The overall size described in the Master plan is appropriate for the location, and there are mitigations, goals, policies, and permit conditions to offset environmental impacts to Lake Tahoe.

Sincerely,



Gavin Feiger
Policy Director

Appendix: Details on Responses to Previous Comments, Community Access Plan, Alternative Transportation Plan, and Enforceability.

The League's June 26, 2024 comments to the Governing Board included: *"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."*

We appreciate the following actions and updates to ensure Master Plan Consistency:

- Additional transportation analysis conducted in November 2024.
- Clarification that the 2024 Plan Amendment does not increase land coverage totals or change the proposed stormwater treatment "train" identified for the Project in the FEIR/EIS and would therefore achieve the same benefits to sediment reduction and water quality. Also clarification that the water quality treatment facilities will accommodate a 50-year storm instead of the required 20-year storm design.
- Guarantee that the Alternative Transportation Plan will be implemented. Special Conditions in Permit in the agenda packet for January 22, 2025:
 - 5.i. The permittee shall provide an irrevocable commitment to the implementation of the Alternative Transportation Plan elements designed to include year-round, winter and summer elements. A short and long term implementation schedule for all transportation improvements identified in the approved amended master plan including those transportation improvement to be implemented upon completion of the construction of the gondola.
 - 5.j. The permittee shall implement and/or demonstrate the ability to implement over time the alternative transportation measures as outlined in the Mitigation and Monitoring Program of the Final EIS.
 - 7. By acceptance of this permit, the Permittee agrees that all mitigation measures outlined in the Homewood Mountain Resort Ski Area Master Plan CEP Project EIS are hereby included as conditions of project approval and will be implemented as such.

The League also commented at the December 11, 2024 APC meeting, providing suggestions for how TRPA could make sure that mitigation measures, policies and goals, and developer promises are implemented:

- *Require third-party monitoring - for public access and vehicle trip reduction, with consequences. We support the well-thought out and thorough 2-report-per-year outline provided by KHP/SMW in their comment letter submitted for this meeting.*
 - At this meeting, Homewood indicated it was open to third-party monitoring but that is not included in the documents proposes for January 22, 2025 approvals.
 - Reporting is still only proposed as annually, not twice per year.
- *Permit conditions, starting with the gondola and maintaining and adapting to monitoring with future project approvals. Permit conditions must codify the ATP and Parking Management Plan to ensure VMT reductions, monitoring with reporting and consequences, public access, etc.*
 - Permit conditions have been included for all, with the exception of an explicit condition regarding public access (this is included within the Public Access Plan itself though).

Community Access Plan: pg. 172 of Master Plan and Appendices: <https://www.trpa.gov/wp-content/uploads/Attachment-A-Exhibit-1-Homewood-Master-Plan-and-Appendices-REDUCED-1.pdf> (image below from Homewood presentation).



Homewood Community Access Plan & Locals Discount

Community Access Plan Key Elements

- Skiing activities available for purchase by anyone with all ski lifts and runs available to anyone with a valid ticket or pass
- Skier services (restrooms, lockers, provisions, ski school, rentals, medical services) open for anyone
- Amenities (amphitheater, community pool, seasonal ice rink, hiking trails, food/beverage offerings, gondola rides) for all
- Dynamic pricing consistent with all other ski resorts

Locals Ski Access Discount Programs Key Elements

- 35% season pass discounts to prior season highest tier Palisades or Northstar season pass for full time West Shore Residents
- Tahoe Basin first responders, military and teachers eligible for 50% discount and unlimited \$75 day ticket availability
- Five-year locals season pass purchase opportunity
- Children ski teams discounted pricing
- Honor roll student comp day tickets
- Employee season passes and buddy passes
- Hosted youth programs
- Volunteer ski patrol programs

Alternative Transportation Plan: pg. 8 of the Master Plan and Appendices:

Alternative Transportation Plan

The Alternative Transportation Plan (ATP), one of a series of transportation strategies, includes the year-round, winter and summer program elements. These elements are:

- Extension of West Shore Bike Trail;
- Employee shuttle bus;
- Employee public bus transit fares;
- North Base-South Base shuttle service;
- Free "Bicycle Share" Service Winter Program;
- Skier Intercept Shuttle Program;
- Winter West Shore Dial-a-Ride Service;
- Summer West Shore Dial-A-Ride Service;
- Electric/Hybrid Car Rental Service/Charging Stations;
- Intercept existing vehicle trips;
- Summer boat trailer parking in day use garage;
- Day skier parking control, surveying and monitoring;
- State Park shuttle service (Sugar Pine, DL Bliss and Emerald Bay);
- Transportation information signage at Tahoe City; and
- Continued funding of regional transportation solutions and critical Environmental Improvement Program (EIP) projects already completed and new unrealized EIP projects identified in the FEIR/FEIS and CEPP programs.

Significant transportation and public transit improvements have occurred since the 2011 approval of the Existing Master Plan. The only ATP element that is not included with these amendments is the summer season water taxi. After the approval of the Existing Master Plan, Placer County implemented a North Tahoe Water Shuttle. Low ridership, low lake level fluctuations, high wind weather conditions, challenging docking, fueling delays, and rising fuel costs have since contributed to its discontinuation.