

Tom Brohard and Associates

April 18, 2011

Michael R. Lozeau, Attorney at Law
Lozeau | Drury LLP
410 12th Street, Suite 250
Oakland, California 94607

SUBJECT: Review of the Draft Environmental Impact Report/Statement (Draft EIR/EIS) for the Homewood Mountain Resort Ski Area Master Plan Project in Placer County – Traffic and Parking Issues

Dear Mr. Lozeau:

Tom Brohard, P.E., has reviewed Chapter 3.0 (Project Description), Chapter 11.0 (Transportation and Circulation), and other portions of the January 21, 2011 Draft Environmental Impact Report/Statement (Draft EIR/EIS) for the Homewood Mountain Resort Ski Area Master Plan Project in Placer County (Proposed Project) prepared by Hauge Brueck Associates. Other documents including Draft EIR/EIS Appendix J (Traffic Counts) and Appendix K-3 (January 12 2011 Parking Study prepared by LSC Transportation Consultants) have also been reviewed.

Further study must be undertaken to properly identify the traffic and parking impacts of the Proposed Project. As discussed throughout this letter, the Draft EIR/EIS contains major technical errors in its traffic and parking analyses of the Proposed Project.

Until the various issues and concerns raised in this letter are addressed, there is “substantial evidence” that the Proposed Project will have adverse traffic and parking impacts that have not been properly disclosed, analyzed, and mitigated. Accordingly, the Draft EIR/EIS for the Homewood Mountain Resort Ski Area Master Plan Project in Placer County must be revised and recirculated.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 40 years of professional engineering experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and now serve as the City Traffic Engineer for the City of Indio and as Consulting Transportation Engineer for the Cities of Big Bear Lake, Mission Viejo, and San Fernando. I have extensive experience in traffic engineering and transportation planning. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for many projects. Several recent assignments are highlighted in the enclosed resume.

Traffic Issues

Based on the information provided in the Draft EIR/EIS for the Homewood Mountain Resort Ski Area Master Plan Project in Placer County, my review indicates the following errors and flaws in the traffic analyses:

- 1) Baseline Traffic Counts May Not Reflect True Peak Hour – As provided in Appendix J, the baseline traffic counts for the Draft EIR/EIS were conducted between 3 PM and 6 PM on Fridays including August 22, 2008, August 29, 2008, and September 5, 2008. The highest Friday afternoon hourly volumes obtained from these traffic counts were then used throughout the traffic analyses for the Proposed Project.

The Draft EIR/EIS has not captured the higher traffic volumes associated with weekend traffic during early August when most families take vacation before their children return to school in late August. Traffic volumes during the first two weekends in August would therefore be higher than those gathered for the Draft EIR/EIS in late August/early September. Additional traffic counts must be taken on weekends in early August at the study intersections and compared against those collected in late August/early September. If the counts in early August are higher, then the Draft EIR/EIS must reevaluate traffic forecasts for the Proposed Project together with the higher baseline volumes.

In addition to the seasonal variation discussed above, traffic volumes during midday on Saturdays in the summer are likely to be higher than the Friday afternoon peak hour. From my experience in serving as City Traffic Engineer since 2006 for Big Bear Lake (a mountain resort community), most visitors arrive over an extended period of time on Fridays. The weekend peak hour traffic volumes during midday on Saturdays are typically higher than on Friday afternoons.

Additional traffic counts must be taken on weekends in early August at the study intersections to identify the highest traffic volume peak hour (Friday afternoon or Saturday midday). If midday Saturday volumes are higher than Friday afternoon counts in early August, then the Draft EIR/EIS must evaluate and analyze the higher baseline traffic volumes. Saturday midday peak hour trip generation rates and forecasts for the resort would then be added and analyzed to properly evaluate and mitigate resulting significant traffic impacts (see Trip Generation comments below).

- 2) Omissions from the Draft EIR/EIS – In comparison with the Environmental Checklists referenced beginning on Page 11-18 of the Draft EIR/EIS, there are omissions from analyses as follows:

Mr. Michael R. Lozeau
Homewood Mountain Resort Project EIR/EIS – Traffic and Parking Issues
April 18, 2011

- a) TRPA Checklist - Hazards to Motor Vehicles, Bicyclists and Pedestrians – The Proposed Project will significantly increase vehicle traffic on Fawn Street, Silver Street, and SR89. A number of resort guests will walk, ride bicycles, or drive across SR89 to use the recreational facilities at the Lake including the Homewood Marina, the water taxi dock, and the West Shore Café restaurant on the east side of SR89. The Draft EIR/EIS must analyze and evaluate if traffic signals are warranted to provide safe passage across SR89 back and forth between the Resort and the recreational, transportation, and restaurant facilities on the Lake.
 - b) CEQA Checklist – Emergency Access – The Proposed Project is expected to significantly increase the number of people at the Resort in the summer. In the event of a major emergency such as a wild fire requiring evacuation, people will attempt to flee in their private automobiles, causing considerable congestion. The Draft EIR/EIS should require preparation and periodic review of an adequate evacuation plan for the Resort.
- 3) Building B Trip Generation Rates Do Not Match the Project Description – As indicated by the name (Homewood Mountain Resort Ski Area) and throughout the Description in Chapter 3, the Proposed Project is planned as a resort. In describing the proposed hotel and other residential units in Building B, Page 3-18 of the Draft EIR/EIS states “The 75-room, five-star boutique-style hotel will feature resort amenities that are expected to include full service restaurant, spa and fitness facility.” Building B will also include 40 two-bedroom, two-bath condominium/hotel units (up to 20 with one-room lock offs) and 30 individually owned penthouse condominium units. The description of Building B concludes that “The condominium/hotel units and penthouse condominium units will be individually owned and owners will be offered full hotel services.”

Trip generation rates for traffic studies of proposed projects in the Lake Tahoe area are published by TRPA, the Tahoe Regional Planning Agency. Their Trip Table is based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 7th Edition. Trip rates listed by TRPA include daily trips per hotel unit and daily trips per resort hotel unit.

ITE defines “Hotels” (Land Use 310) as “...places of lodging that provide sleeping accommodations and supporting facilities such as restaurants; cocktail lounges; meeting and banquet rooms or convention facilities; limited recreational facilities (pool, fitness room); and/or other retail and service shops.” ITE defines “Resort Hotels” (Land Use 330) as “...similar to hotels in that they provide sleeping accommodations, restaurants, cocktail lounges, retail shops and guest services. The primary difference is that resort hotels cater to the tourist and vacation industry, often providing a wide variety of recreational facilities/programs (golf course, tennis courts, beach access, or

Mr. Michael R. Lozeau
Homewood Mountain Resort Project EIR/EIS – Traffic and Parking Issues
April 18, 2011

other amenities) rather than convention and meeting business. Resort hotels are normally located in suburban or outlying locations on larger sites than conventional hotels.”

From the Project Description, all hotel rooms, condominium/hotel units, and penthouse condominium units in Building B must utilize the Resort Hotel trip rate. Rates for each occupied resort hotel room are 13.43 Saturday daily trips and 1.23 Saturday midday peak hour trips. These rates are significantly higher than the weekday daily and PM peak hour rates used by the Draft EIR/EIS including 8.92 daily and 0.70 PM peak hour trips for the hotel and hotel/condo units as well as the 5.86 daily and 0.52 PM peak hour trips for the penthouse condominiums.

- 4) Additional Building B Saturday Trips Will Likely Create More Traffic Impacts - In its calculation of weekday daily and PM peak hour trips for Building B, the Draft EIR/EIS assumed that 50 percent of the lodging guests arrive on Friday and it used 1.5 daily and 0.75 PM peak hour trips as the rate for half of each type of unit in Building B. The Draft EIR forecast Building B will generate 811 daily and 117 PM peak hour trips on a Friday in late August/early September.

For trip generation at the resort hotel rate on a Saturday with all rooms occupied, 165 units in Building B would generate 2,216 Saturday daily trips including 203 Saturday midday peak hour trips. Adding these trips that are 75 percent higher than forecast in the Draft EIR/EIS to the increased Saturday midday peak hour baseline volumes during the first two weeks of August will likely create additional significant traffic impacts that must be identified, evaluated, analyzed, and mitigated.

- 5) Other Intersections May Experience Significant Traffic Impacts – According to Table 11-8 on Page 11-24 of the Draft EIR/EIS, an intersection experiences a significant traffic impact if the Level of Service (LOS) deteriorates to LOS E for more than four hours during peak travel periods or to LOS F. Mitigation of significant traffic impacts is then required. Based on the analyses in the Draft EIR/EIS for the Friday PM peak hour using the late August/early September baseline, several other intersections may experience significant traffic impacts under various scenarios as follows:

- a) Existing plus Project Scenario - Table 11-22 on Page 11-72 of the Draft EIR/EIS reports LOS and delay during winter for Existing and Existing plus Project Conditions. At the intersection of SR89/Fawn Street, the LOS for traffic on Fawn Street deteriorates from LOS C to LOS E. While Footnote 3 is missing from this table, Footnote 3 in other similar tables in the Draft EIR/EIS indicates “The analysis period represents the absolute peak hour. The LOS E condition is not expected to exceed 4 hours of the day and therefore is not considered to be a significant impact.”

No data, analysis, or calculations are provided by the Draft EIR/EIS to affirm that the LOS E condition will last only four hours or less. If LOS E lasts more than four hours, then this intersection is significantly impacted during winter for existing plus project conditions and mitigation is required. The Draft EIR/EIS must analyze LOS conditions during other hours to support its conclusion of no significant impact at SR89/Fawn Street.

- b) Cumulative plus Project Scenario - Table 11-26 on Page 11-88 of the Draft EIR/EIS reports LOS and delay during summer for Cumulative and Cumulative plus Project Conditions. At the intersections of SR89/Ski Bowl Way and SR89/Pine Street, the LOS for traffic on Ski Bowl Way and on Pine Street deteriorates from LOS D to LOS E. Footnote 3 to this table in the Draft EIR/EIS indicates “The analysis period represents the absolute peak hour. The LOS E condition is not expected to exceed 4 hours of the day and therefore is not considered to be a significant impact.”

No data, analysis, or calculations are provided by the Draft EIR/EIS to affirm that the LOS E condition will last only four hours or less. If LOS E lasts more than four hours, then this intersection is significantly impacted during winter for existing plus project conditions and mitigation is required. The Draft EIR/EIS must analyze LOS conditions during other hours to support its conclusion of no significant impact at SR89/Ski Bowl Way and SR89/Pine Street.

- 6) SR89/Fawn Street Traffic Mitigation Measure Is Incomplete – Table 11-28 on Page 11-98 of the Draft EIR/EIS reports LOS and delay during winter for Cumulative and Cumulative plus Project Conditions. At the intersection of SR89/Fawn Street, the LOS for traffic on Fawn Street deteriorates from LOS D to LOS F, a significant traffic impact. Page 11-104 of the Draft EIR/EIS requires that the project add a 100 foot long left turn pocket on Fawn Street. From review of the plans for the Proposed Project in Figure 3-8 on Page 3-23, Fawn Street is proposed to be only 27 feet wide between the outside curbs, an insufficient width to provide three 12 foot wide travel lanes. The mitigation measure must be clarified to require widening of the Fawn Street approach to SR89 to at least 36 feet between curbs. Based on the traffic forecasts, the left turn lane should also be lengthened to at least 165 feet.

As previously indicated, a number of resort guests will walk, ride bicycles, or drive across SR89 in the vicinity of Fawn Street to use the recreational facilities at the Lake including the Homewood Marina, the water taxi dock, and the West Shore Café restaurant on the east side of SR89. The Draft EIR/EIS must analyze and evaluate if traffic signals are necessary to provide safe passage across SR89 back and forth between the resort and the recreational, transportation, and restaurant facilities on the Lake. With a posted Speed Limit of 35 MPH on SR89 in this area, it is likely that the critical (85th

percentile) speed on SR89 exceeds 40 MPH. Under those higher speed conditions, the volumes needed to warrant a traffic signal are only 70 percent of the values used for slower speeds. In addition to the widening of Fawn Street, the Draft EIR/EIS must evaluate the need for a traffic signal at this intersection to reduce delay, improve LOS, and provide a safe, controlled crossing for pedestrians and bicyclists.

Parking Issues

Based on the information provided in the Draft EIR/EIS and the Parking Study for the Homewood Mountain Resort Ski Area Master Plan Project in Placer County, my review indicates the following errors and flaws in the parking analyses:

- 1) Conflicts with Project Description – There are a number of conflicts between Page 2 of the Parking Study and the description of the Proposed Project on Page 3-18 in the Draft EIR/EIS including:
 - a) The Parking Study indicates there are 221 housing units including 20 lock-off units whereas the Draft EIR/EIS shows 201 housing units including the 20 lock-off units at North Base.
 - b) The Parking Study indicates 15,000 square feet of community commercial with 10,000 square feet at Mid-Mountain whereas the Draft EIR/EIS shows 25,000 square feet of community commercial at North Base, a portion of which may be at Mid-Mountain. Page 9 of the Parking Study assumes the additional 10,000 square feet of commercial use (which is not guaranteed to be at Mid-Mountain) requires no additional parking.
 - c) The Parking Study assumes 770 parking spaces whereas Draft EIR/EIS indicates 729 parking spaces with potentially up to 770 parking spaces at North Base.
 - d) The Parking Study assumes 150 parking spaces for South Base whereas Draft EIR/EIS indicates 117 parking spaces with up to 150 parking spaces “ultimately provided”.
- 2) Errors in the Parking Study (Winter) – There are several errors in the Parking Study for winter including:
 - a) The Parking Study Demand Analysis units in Table 1 do not match up with Winter Trip Generation units in Table 11-13 (residential units, shopping center, accessory uses at hotel, etc.)

Mr. Michael R. Lozeau
Homewood Mountain Resort Project EIR/EIS – Traffic and Parking Issues
April 18, 2011

- b) The Parking Study Table 1 indicates Mid-Mountain facility generates parking demand only in summer.
 - c) Table 11-13 indicates the Fitness Center/Spa will be 10,590 square feet. Table 1 in the Parking Study does not assume any employees in the Fitness Center/Spa or related employee parking.
 - d) Page 5 of the Parking Study assumes there will not be a “local” event at the hotel such as a service club meeting on a day of peak hotel occupancy. No mitigation measures are proposed to preclude this from occurring and further compounding the parking deficiencies.
 - e) Page 9 of the Parking Study assumes 40 percent of the community retail trips are “internal” to the resort and reduces the parking to be provided by that percentage. Table 11-13 assumes only 30 percent of the trips generated by the resort are “internal”.
 - f) Page 9 of the Parking Study indicates only 62 parking spaces will be required on site to accommodate 193 peak time employees. The reductions include an assumption that 25 percent of these employees will use transit, a very high and unsupported percentage, whereas none of the hotel employees will use transit.
 - g) Page 9 of the Parking Study indicates there will be parking for 400 day skiers. Page 3 indicates the current operation (with all day skiers) generates a maximum of 942 parked vehicles on site plus an additional unspecified number of vehicles parked on the adjacent streets and on SR89. How will the project limit the number of parking spaces for day skiers to a maximum of 400?
 - h) Table 2 on Page 11 assumes the 62 ski employee parking spaces will be provided elsewhere during peak ski weekends. Page 11-60 of the Draft EIR/EIS states a plan will be developed and further environmental review will be needed. Developing a plan in the future for off-site ski employee parking defers mitigation. The generalities mentioned on Page 10 of the Parking Study do not constitute a plan for off-site ski employee parking.
 - i) Table 2 on Page 11 shows a parking supply of 770 spaces at North Base when only 729 are actually proposed (see above). Even if 50 guests go elsewhere to ski and even if 62 employees park elsewhere off site, North Base would be short 21 parking spaces rather than having a surplus of 20 spaces shown in Table 2.
- 3) Incomplete Parking Study (Summer) - The Parking Study for summer is incomplete as follows:

Mr. Michael R. Lozeau
Homewood Mountain Resort Project EIR/EIS – Traffic and Parking Issues
April 18, 2011

- a) The Parking Study continues to assume 770 spaces will be provided at North Base rather than 729. Boat trailer parking can be expected to occupy a number of the remaining 296 parking spaces. How will the boat trailers be removed to provide a portion of the parking needed for concert events?
 - b) In addition to the parking of boat trailers in the resort parking lots during the summer, additional boat trailers park on both sides of SR89 as well as on both sides of the local streets. If parking on SR89 and the side streets is either eliminated entirely or restricted by time limits, additional demand for boat trailer parking in the resort parking lots will be created. How will the boat trailers be removed to provide a portion of the parking needed for concert events?
 - c) Page 15 of the Parking Study concludes that 253 vehicles (actually 294 vehicles based on 729 spaces) would need to be parked elsewhere during concerts. The Parking Study does not present any plans or programs to deal with the parking shortage during the 3 to 5 relatively large events during the summer.
- 4) Other Issues Not Addressed – There are several unaddressed issues relating to parking as follows:
- a) The Proposed Project proposes to limit parking on site to only 400 day skiers. How will day skiers be directed to the 244 parking spaces in the parking structure and 156 parking spaces in the underground structure?
 - b) How will the project accommodate the day skier parking demand and eliminate parking on the adjacent streets and on SR89?
 - c) Page 3-18 of the Draft EIR/EIS indicates the 410 underground parking spaces below Buildings A and B will include “valet stacked and single parking spaces”. From Table 2 on Page 11 of the Parking Study, there will be a parking demand for 432 spaces underground including 156 day skiers. How will the parking demand and day skier parking be managed – valet or self park?
 - d) Accepted practice indicates parking demand should not exceed 90 percent of the parking supply so that traffic congestion does not result by driving around to find the last few available parking spaces. Contrary to accepted practice, parking demand exceeds the parking supply for the Proposed Project. What parking management systems will be employed to maximize the use of the parking provided?

Mr. Michael R. Lozeau
Homewood Mountain Resort Project EIR/EIS – Traffic and Parking Issues
April 18, 2011

- e) Additional parking spaces on site will be needed to accommodate shuttle busses and resort service vehicles. Where will this parking be provided?
- f) The Proposed Project should provide personnel to discourage illegal parking on adjacent streets and monitor violations of the proposed two hour time limited parking. Violators should be towed away.

As discussed throughout this letter, there is “substantial evidence” that the Homewood Mountain Resort Ski Area Master Plan Project in Placer County will have adverse traffic and parking impacts that have not been properly disclosed, analyzed, and mitigated in the Draft EIR/EIS. A Recirculated Draft EIR/EIS must be prepared to address the issues and concerns raised in this letter and those expressed by others. If you have any questions regarding these comments, please call me at your convenience.

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard

Tom Brohard, PE
Principal

Enclosure

