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MEMORANDUM

Date: August 23, 2011
Revised: December 2, 2011

To: Joanne Marchetta, TRPA Executive Director

From: David L. Landry, Senior Planner, Planning Department

Subject: Homewood Mountain Resort Ski Area Master Plan EIR/EIS

Methodology for Tracking Land Coverage Banking

5154 West Lake Boulevard, Placer, County, California, Assessor's Parcel Numbers (APNs)

097-130-16, TRPA File Number STD20061130

Public comments received after the circulation of the FEIR/EIS state that land coverage numbers used in the final document are incorrect. Based on a re-evaluation of the submitted materials, aerial photographs, etc., TRPA staff has concluded that 172,852 square feet of previously verified coverage has been removed from individual road segments and that these road segments have been successfully restored and re-vegetated. This amount is a reduction from the previous amount of 243,428. This is due to the fact that that two of the dirt roads identified by Homewood as restored soft coverage were not verified as legally existing coverage as they did not exist as of February 10, 1972 or did not include permitting documentation. Of the roads that were duly verified, 172,852 square feet of coverage has been banked. This banked land coverage is available for use in implementing the proposed Master Plan over and above land coverage restoration requirements.

Under this scenario, the HMR Master Plan goal of restoring up to 500,000 square feet of verified land coverage associated with onsite roadways would be unchanged - only the location of the proposed restoration work would change. The land coverage reductions and percentages reported in the EIR/EIS would therefore also be unchanged.

<u>Background</u>: In continuing the analysis of the Homewood Mountain Resort Ski Area Master Plan and preparation of the joint of EIR/EIS, JMA Ventures, the current owner of Homewood Mountain Resort, has submitted an application for the banking of verified soft land coverage associated with unused ski facilities and restored roads which span a number of HMR parcels, see TRPA File Number VBOC2011-0237. In October 2005 HMR made application for a Grading/Road Restoration permit for the restoration of existing roads on the mountain at Homewood Mountain Resort, using various re-vegetation, mulching, soil treatments, re-contouring and other techniques. As a result of restoration work from 1998, it was determined that some road segments and other facilities were adequately restored and the land coverage for those facilities was banked in the amount of 126,324 square feet of coverage, see TRPA File 970662. Over the course of several months, beginning in 2005 and continuing through 2006, several additional applications for the verification of existing land coverage from restored roads and

other facilities were submitted to TRPA for Homewood Mountain parcels identified in Attachment A. The purpose of the verifications was to substantiate the continued removal and restoration of unused facilities and unpaved road segments throughout the rest of the Homewood project area. The methodology used to substantiate the completed restoration work was based on the review of historic aerial photographs, field measurements, and site reconnaissance of road segments that were subjected to various de-compaction and restoration techniques as described in Attachment B; Homewood Mountain Resort Road Coverage Removal Summary. As a result of this process TRPA was able to verify the existence of +/-1,090,078 square feet of soft coverage associated with the onsite roads and another 9,485 square feet of coverage associated with accessory ski facilities, for a total of 1,099,563 which is now eligible to be restored and banked.

In moving forward with the completion of the banking application it was necessary to reconcile differences in the previous parcel configuration used for the land coverage verification process and the new, reconfigured parcels used for the banking application. The following is a description of the boundary line adjustment, land coverage verification and land capability processes needed to complete the land coverage banking process.

Boundary Line Adjustment:

Background: In preparation of the potential acquisition of the Homewood Mountain Resort by the US Forest Service, Jeff Yurosek, the previous owner of the Homewood Mountain Resort actively pursued the necessary approvals to facilitate the acquisition. As this acquisition would span several parcel boundaries, it was deemed necessary to conduct a Boundary Line Adjustment which would reconfigure and consolidate 30 existing parcels or legal lots of record into 20 parcels. The BLA process initiated by Mr. Yurosek was not finalized and the resort was sold to JMA Ventures who in December 2005 made formal application to complete the boundary line adjustment. The approval of the boundary line adjustment was finalized in August 2009 with the Forest Service acquiring a small portion of Homewood Mountain Resort known as the Quail Lake watershed. Attachment C shows the previous parcel configuration which was used to complete the land coverage verification and Attachment D which shows the resulting (new) configuration used to complete the Land Coverage Banking process. The finalized Boundary Line Adjustment establishes the current parcel configuration for the review and analysis of the proposed ski area Master Plan and related environmental documents. It should be noted that the Land Coverage Verifications conducted between 2005 and 2006 were done so using the parcel configuration that existed prior to the 2009 Boundary Line Adjustment approval.

Land Coverage Verification:

Additional Information: The following is further detail on the process used for verifying restored land coverage on the Homewood Mountain Resort project area. Area calculations for the Land Coverage Verification consist of unpaved roads, identified as 'dirt roads' in the TRPA verification letters and ski facilities consisting of; (ski lift tower footings, lift shacks, cable wheel platforms, lift terminals and other structures). A U.S. Forest Service Aerial photograph taken in 1969 was used to verify the legal existence and extent of the roads on the Homewood Mountain Resort site. In addition road maps developed from field surveys were overlaid onto the aerial photo by Tri State Surveying in 2005 and 2006 to confirm the accuracy of both the survey maps and aerial photograph. Road widths for coverage verifications were then measured in the field with the road width dimensions overlaid on the aerial photograph by Tri State Surveying. For restoration purposes, the mapped road segments were broken into 'project areas' of varying lengths based on widths of restored areas that were field measured after undergoing Tier 1, 2, or 3 restoration techniques, (described in the Homewood Mountain Resort Road Coverage Removal Summary), Attachment B. By comparing the restored area road widths and lengths with the recorded

road widths on the aerial photo, TRPA Staff was able to calculate the total square footage of restored land coverage eligible for banking and the total square footage of restored disturbed area eligible for restoration credit. It should be noted that the total amount of banked land coverage cannot exceed the total amount of land coverage that was verified by TRPA in 2005 and 2006. It should also be noted that to present the most conservative land coverage calculations for existing conditions, the land coverage totals have been calculated to exclude lands beneath public ROWs within the South Base area per TRPA Code of Ordinances Section 20.3.D(1)(b). 20,110 square feet has been excluded from the calculations as it is unclear if land coverage beneath the public rights-of-way (ROW) was included or excluded from a review of the analysis completed for the boundary line adjustments within the Project area.

Land Capability:

TRPA performed a series of Land Capability Verifications for various portions of the Homewood Mountain Resort between 1993 and 2007, prior to the review of the current Ski Area Master Plan proposal. These verifications were performed to support the evaluation of proposed projects such as ski lift modifications and forestry activities, separate from the current master plan project. In May 2008, Homewood Village Resorts LLC filed a Land Capability Challenge (LCC) for two areas within the Homewood Mountain Resort. One LCC area contained the eastern most portion of Homewood Mountain Resort encompassing both the North and South Base areas. The second LCC area was somewhat linear, running northeast to southwest and roughly centered on the proposed mid-mountain lodge. These LCC's were initiated due to disagreement about mapped soil types and the extent of Stream Environment Zones (SEZs) in and around developed areas. The TRPA Hearings Officer approved a revised Land Capability Verification for the LCC areas at a public hearing in August 2009. The revised Land Capability Verification resulted in changes to the extent of SEZs and reclassified several land capability districts. TRPA received no formal appeals during the appeals period for the LCC.

In October 2010, Homewood Village Resorts LLC submitted a Land Capability Verification request for the remainder of the Homewood Mountain Resort project area not included in the LCC areas. This 2010 verification request included soil descriptions and draft land classifications prepared by a licensed surveyor. The draft land classifications were corroborated and revised by TRPA staff based on field observations and measurements of representative SEZ areas, aerial photographs, soil maps, and topographic slope-phase information. The revised land classifications were approved by TRPA in December 2010. The 2010 Land Capability Verification evaluated and, where appropriate, integrated information from verifications completed between 1993 and 2007. The 2010 verification also incorporated recent field data, and used the most current topographic and soil information to evaluate land capability across the entire Homewood Mountain Resort, with the exception of the already approved LCC areas. Due to the quality of data available for the above described process, the 2010 verification was determined to be the most accurate land capability verification for the Homewood Mountain Resort project area. As such, it was determined that the 2010 verification would supersede any previous verification if there was a discrepancy between the two. The 2010 verification was overlaid onto the reconfigured parcels and is being used for the banking of restored land coverage, and in the analysis of environmental impacts for the ski area master planning process.

Banking of Land Coverage:

The TRPA Regional Plan provides for the verification and "banking" of several types of legally existing development (land coverage) for use onsite at a later date or for transfer to another parcel. TRPA uses the term "banking" to describe the recording with TRPA of a particular amount of previously existing development that is now available for use. Only development verified as legally existing prior to TRPA's regulation of land use, i.e. existed prior to TRPA's first Code, February 10, 1972, and was present on

October 15, 1986 or was approved between February 10, 1972 and October 15, 1986, and was present on October 15, 1986 is eligible to be banked.

In July 2011 JMA Ventures submitted an application for the banking of restored roadway land coverage on the upper reaches of the Homewood Mountain Resort. TRPA staff carried out field reconnaissance to determine the effectiveness of the various tiers of restoration treatment and road lengths and widths. In order to complete the Banking approval, staff requested that the applicant provide an assembly of additional mapping details depicting the parcel configuration after the 2009 Boundary Line Adjustment, the verified Land Capability mapping overlaid onto the updated parcel map, and a table of restored road segment lengths and widths by parcel. The road segment lengths and widths were then compared to the 1969 aerial photograph and TRPA verification letters and again re-evaluated in Dec 2011. From this information staff was able to verify that 172,852 square feet of land coverage requested to be banked was legally existing and has been removed and restored. As such, Staff has re-issued the banking application identified as TRPA File Number VBOC2011-0237.

Attachment A

Homewood Mountain Land Coverage Verification Approvals Table

Date	Parcel Number	TRPA File Number	Road Coverage (SF)
March 1, 2006	097-050-24	20050793	57,232
March 1, 2006	097-050-33	20050789	494,229
March 1, 2006	097-050-34	20050794	41,426
March 1, 2006	097-050-35	20050795	184,742
March 1, 2006	097-050-40	20050796	133,591
March 1, 2006	097-050-42	20050797	72,704
March 1, 2006	097-060-12	20050801	106,154
			1,090,078

Date	Parcel Number	TRPA File Number	Ski Facility Coverage (SF)
March 1, 2006	097-050-24	20050793	969
March 1, 2006	097-050-33	20050789	2,836
March 1, 2006	097-050-34	20050794	750
March 1, 2006	097-050-35	20050795	679
March 1, 2006	097-050-40	20050796	2,723
March 1, 2006	097-050-42	20050797	1,378
March 1, 2006	097-060-12	20050801	150
			9,485



Homewood Mountain Resort Road Coverage Removal Summary

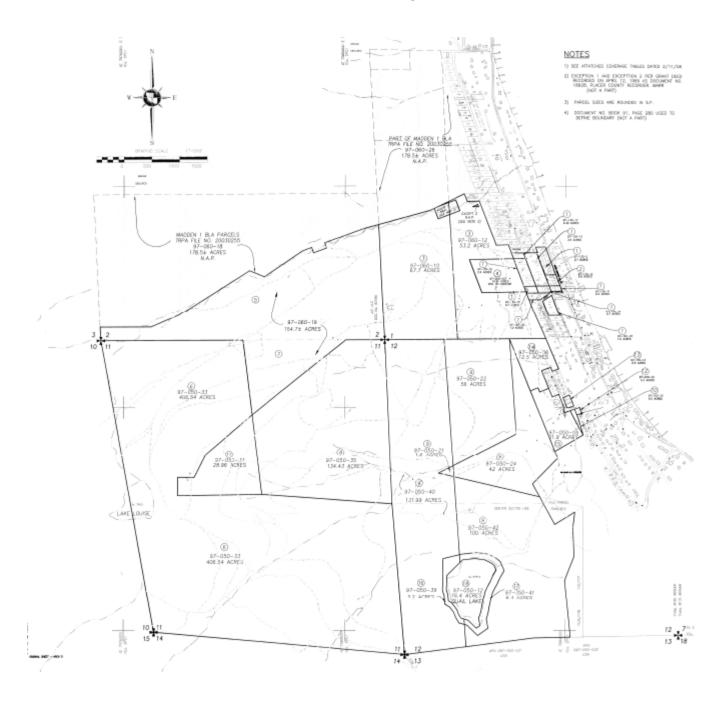


Prepared by Kevin Drake and Heather Beckman Integrated Environmental Restoration Services, Inc. August 13, 2011



Attachment C

Homewood Mountain Parcel Configuration Pre-BLA



Attachment D

Homewood Mountain Parcel Configuration Post-BLA

