

NORTHSTAR MOUNTAIN MASTER PLAN FINAL ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2012112020

Prepared for:

PLACER COUNTY
COMMUNITY DEVELOPMENT/RESOURCE AGENCY
3091 COUNTY CENTER DRIVE, SUITE 140
AUBURN, CA 95603

Prepared by:



2729 PROSPECT PARK DRIVE, SUITE 220
RANCHO CORDOVA, CA 95670

JUNE 2014

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1.0 INTRODUCTION

This Final Environmental Impact Report (Final EIR) contains public and agency comments received during the public review period of the Northstar Mountain Master Plan Draft Environmental Impact Report (Draft EIR; DEIR). This document has been prepared by Placer County, as lead agency, in accordance with the California Environmental Quality Act (CEQA) and Guidelines (Section 15132). Chapter 1.0 discusses the background of the Draft EIR and the organization of the Final EIR, and lists the 70 comment letters received.

1.1 BACKGROUND

The Draft EIR contains the following environmental analysis sections:

- Land Use and Forestry Resources
- Population, Housing, and Employment
- Biological Resources
- Cultural Resources
- Visual Resources
- Traffic and Circulation
- Air Quality
- Noise
- Geology and Soils
- Hydrology and Water Quality
- Public Services
- Hazardous Materials and Hazards
- Greenhouse Gases and Climate Change

The County used several methods to solicit public input on the Draft EIR. These methods included the distribution of a Notice of Preparation (NOP) on November 6, 2012, and the distribution of the Draft EIR for a 45-day comment period from November 26, 2013, through January 13, 2014. The Draft EIR was distributed to applicable public agencies, responsible agencies, and interested individuals. Copies of the document were made available at the public counter of the Community Development Resource Agency, located at 3091 County Center Drive, Auburn, California 95603. In addition, the Draft EIR was made available for public review on the Placer County website. A public hearing on the Draft EIR was also held on January 9, 2014, at 10:00 a.m. in the Placer County Planning Commission Hearing Room, located at 3091 County Center Drive. The purpose of the hearing was to receive comments on the Draft EIR for the project.

1.2 ORGANIZATION OF FINAL EIR

The Final EIR is organized into the following chapters:

1.0 Introduction

Chapter 1.0 provides an introduction and overview of the document, describing the background and organization of the Final EIR. Chapter 1.0 also includes a list of commenters who submitted letters in response to the Draft EIR, as well as five master responses to address subjects that appear multiple times in the comment letters.

2.0 Revisions to the Draft EIR

Chapter 2.0 is intended to summarize changes made to the Draft EIR text, either in response to comment letters or minor staff edits that do not change the intent or content of the analysis or effectiveness of mitigation measures.

3.0 Responses to Comments

Chapter 3.0 presents all of the comment letters received and responses to each comment. Each comment letter received has been numbered at the top and then bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1.

4.0 Mitigation Monitoring and Reporting Plan

The Mitigation Monitoring and Reporting Plan (MMRP) in Chapter 4.0 includes a description of the CEQA requirements for monitoring or reporting programs for projects approved by a public agency. In addition, the MMRP includes all of the mitigation measures identified in the EIR for the proposed project, along with the party responsible for monitoring implementation of the mitigation measures, the milestones for implementation and monitoring, and a sign-off that the mitigation measures have been implemented. The intent of the MMRP is to prescribe and enforce the proper and successful implementation of the mitigation measures as identified in the EIR for this project.

1.3 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft EIR:

Letter	Individual or Signatory	Affiliation	Date
A	Scott Morgan	Governor's Office of Planning and Research	01/10/14
B	Alan Miller	Lahontan Regional Water Quality Control Board	01/13/14
C	Rob Wood	Native American Heritage Commission	12/26/13
D	Mike Staudenmayer	Northstar Community Services District	01/03/14
E	Eric Martin & Mark Shadowens	Northstar Community Services District	01/03/14
F	Blake Tresan	Truckee Sanitary District	12/31/13
G	Angel Green	Placer County Air Pollution Control District	01/13/14

Letter	Individual or Signatory	Affiliation	Date
H	Jason A. Parker	Tahoe-Truckee Sanitation Agency	01/13/14
1	W. Thomas Amen	Resident	01/11/14
2	Don Andrews	Resident	01/08/14
3	William J. Banka	Resident	01/09/14
4	Richard A. Bjur	Resident	01/13/14
5	Barry & Laura Bosshard	Residents	01/13/14
6	Don Carr	Carr Long Real Estate	Not Dated
7	Stuart Cramer	Kennedy Wilson Residential Investments Group	01/02/14
8	Linda & Lawrence Danto	Residents	12/04/13
9	Gary Davis	Gary Davis Group	01/06/14
10	Cornel DeLorean	Resident	01/13/14
11	Genie Donnelly	Resident	01/03/14
12	Beryl Drinkwater	Resident	01/10/14
13	Sheryl Drinkwater	Resident	01/10/14
14	Thomas A. Dwelle	Flyers Energy	01/09/14
15	Lewis S. Feldman	Feldman, McLaughlin, Thiel LLP	01/08/14
16	Kelly Gilligan	Resident	01/08/14
17	Mimi Greene	Resident	01/12/14
18	Thomas Hobday	Resident	12/21/13
19	Jan Hoffman	Resident	01/11/14
20	William Hoffman	Resident	01/07/14
21	Jake Judson	Holdrege & Kull Consulting Engineers and Geologists	01/12/14
22	Brian & Molly Hughes	Residents	01/08/14
23	Cynthia Karr	Resident	01/11/14
24	Ed Kimball	Resident	01/08/14
25	Edgar Kimball	Resident	12/03/13
26	Joy Anderson Kimball	Resident	01/08/14
27	Tori Long	Resident	01/12/14
28	Jennifer Mangan	Resident	01/09/14
29	Jacqueline & David Marcus	Residents	12/09/13
30	Joseph Mattioli	The Ritz-Carlton, Lake Tahoe	12/04/13
31	Tom Merrick	Resident	12/07/13
32	Gabrielle Middleton	Resident	01/03/14

Letter	Individual or Signatory	Affiliation	Date
33	Lynda Ward Pierce	Resident	01/05/14
34	Paul Pierce	Resident	01/10/14
35	James L. Porter, Jr.	Porter Simon Corporation	01/07/14
36	Blake Riva	Northstar Mountain Properties	01/13/14
37	Andrew Sackheim	Resident	01/13/14
38	Andrew Sackheim	Resident	01/10/14
39	M. Eric Schlienger	Resident	01/05/14
40	Lisa Smith	Resident	01/10/14
41	Greg Snow	Resident	01/08/14
42	Chris Somers	Resident	01/02/14
43	Jim Steeb	Resident	01/09/14
44	Robert Thornton	Resident	01/13/14
45	Sylvia Toth & Zsolt G. Takacs	Residents	01/08/14
46	Pete & Christine Vall-Spinosa	Residents	01/07/14
47	Christine H. Vall-Spinosa	Resident	01/09/14
48	Ellie Waller	Resident	01/13/14
49	David Welch	Resident	01/13/14
50	Ron Wihlidal	Resident	01/10/14
51	Jennifer Wilkin	Northstar Venture Penthouses	Not Dated
52	Larry Young	Resident	01/09/14
AA	Susan Gearhart & Jennifer Quashnick	Friends of the West Shore	01/12/14
BB	Darcie Goodman Collins	League to Save Lake Tahoe	12/16/13
CC	Sandy Evans Hall	North Lake Tahoe Resort Association	12/20/13
DD	Geoff Sullivan Stephens	Northstar Property Owners Association	01/08/14
EE	Geoff S. Stephens	Northstar Property Owners Association	01/13/14
FF	Ann Nichols	North Tahoe Preservation Alliance	01/04/14
GG	Greg C. Gatto	Stoel Rives representing Aspen Grove Owners Association	01/13/14
HH	Greg C. Gatto	Stoel Rives representing Aspen Grove Owners Association	01/15/14
II	Steve Teshara	Sustainable Community Advocates	01/06/14
JJ	James Telling	Northstar Mountain Association	01/10/14
PC	Multiple	January 9, 2014, Placer County Planning Commission Meeting	01/09/14

1.4 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

State CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204).

State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to State CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

State CEQA Guidelines Section 15088 recommends that where response to comments results in revisions to the Draft EIR, those revisions be noted as a revision to the Draft EIR or in a separate section of the Final EIR. As a result of the comment letters received, revisions have been made to the text of the Draft EIR. Readers are directed to Section 2.0, Revisions to the Draft EIR, of this Final EIR for details concerning the resultant changes.

MASTER RESPONSES

Some subjects were mentioned frequently in comment letters on the Draft EIR. Rather than provide individual responses to each of these comments, the Final EIR includes “master responses” that discuss the topic based on all of the comments received. By responding in this manner, the County is better able to address all aspects of the topic by:

- Simplifying the responses to comments by avoiding unnecessary repetition in individual responses, and
- Addressing issues in a broader context than might be required by individual comments.

When issues are addressed in this broader context, the interrelationships between some of the individual issues raised can be better clarified; it is also possible to provide a single explanation of an issue that is more thorough and comprehensive than would be accomplished by separate, more narrowly focused responses.

The following themes are discussed in the master responses:

- Potential drainage and groundwater impacts to the Aspen Grove community
- Potential traffic-related impacts
- Potential environmental impacts to the Tahoe Basin
- Project segmentation concerns
- Potential impacts to forest resources associated with the proposed zoning text amendment

Master Response 1 – Drainage and Hydrology

Several comment letters (B, E, 1, 2, 4, 5, 10–13, 16, 17, 19, 20, 22–26, 28, 29, 32–34, 37, 38, 41, 43–47, 50, and GG) express concerns regarding the proposed Northstar Mountain Master Plan’s (NMMP) potential contribution to existing surface water and subsurface (groundwater) flows from the operation of an existing stormwater water quality basin at the Northstar Village. The Northstar Village is located southeast of the intersection of Northstar Drive and Big Springs Drive, immediately south of, and up-gradient from, the Aspen Grove Condominiums (Aspen Grove). The Northstar Mountain Master Plan project site is located farther south, about one-half mile generally, and is topographically up-gradient (upslope) of the Northstar Village, on separate parcels than the Northstar Village parcels.

Many of the commenters allege the operation of the existing Northstar Village water quality basin (“WQ Basin”) has resulted in damage to the Aspen Grove foundations and trees due to increases in subsurface groundwater, presumably as a result of the close proximity of the Northstar WQ Basin to Aspen Grove, and the supplemental localized groundwater mounding effect, created by the water contained in the WQ Basin. The County has been made aware of third-party litigation between plaintiff Aspen Grove and defendants East West Partners (developers of the Northstar Village) and the CNL Income Northstar, LLC (underlying fee owner), *Aspen Grove Condominium Association vs. CNL INCOME NORTHSTAR, LLC*. A February 2013 Interlocutory Judgment in favor of Aspen Grove is currently under appeal.

These comment letters suggest that the Draft EIR fails to adequately address the potential of the proposed NMMP to result in additional flows, both surface and groundwater, to the Northstar Village WQ Basin, which could create further impacts to the Aspen Grove property. Specific concerns responded to in this master response include the following:

- Processing of the NMMP should be suspended pursuant to the County’s investigation of County Code violations pursuant to County Code Section 15.48.160.
- DEIR failure to establish a proper baseline to assess NMMP drainage impacts.
- Drainage analysis does not factor the impact on drainage related to proposed NMMP increased snowmaking.
- Improper deferral of mitigation for drainage impacts.
- Failure to provide feasible mitigation measures to mitigate significant drainage impacts.

Each of these issues is responded to below.

Processing of the NMMP should be suspended pursuant to the County’s investigation of County Code violations pursuant to County Code Section 15.48.160.

The comment letters reference County Code Section 15.48.160 that states, “No building permit, septic, water, sewer, electrical permit, or any other permit shall be issued by the county to any person for any premises or portion thereof which is in violation of this article.” On February 7, 2014, County staff responded in writing to a code enforcement complaint from the Aspen Grove HOA’s attorneys as to whether the Northstar Village WQ Basin is being operated in violation of applicable County Codes. **Appendix A** contains County correspondence that summarizes the results of the County staff investigation that concluded that there is no evidence of violations of County Code Article 15.48.

DEIR failure to establish a proper baseline to assess NMMP drainage impacts.

Comment letter GG specifically requested in previous comments on the Notice of Preparation that the following actions are done to establish the baseline of drainage conditions for the project and that the DEIR failed to establish any baseline of drainage and groundwater flows. Baseline data is provided below each requested item identified in comment letter GG, as well as a response to items that were not considered appropriate or necessary for the DEIR analysis given the nature of the project (ski facility and recreation improvements throughout the Northstar property).

- Establish a baseline based on amount of water currently used for snowmaking. This analysis must also identify where the snowmaking water is coming from, what specific lifts the water is being applied to, and the amount of water being applied to each lift, so that groundwater recharge calculations can be appropriately formulated.

DEIR page 13-40 specifically identifies that current snowmaking is estimated to use 258 acre-feet annually (based on technical information provided in the 2004 Northstar-at-Tahoe Mountain Improvements EIR). However, the amount of water utilized for snowmaking annually varies depending on winter weather conditions (e.g., calm winds and temperatures appropriate for making snow) and the extent of precipitation that occurs in a given year (see DEIR page 13-40). Snowmaking data for years 2002 through 2012 have ranged from a high of 533.56 acre-feet in 2012 to a low of 93.66 acre-feet in 2002, with snowmaking water demands averaging 229.1 acre-feet during this period (Hall 2014a). Water is supplied by the Northstar Community Services District originating from two natural springs (Sawmill Flat and Big Springs, which provide approximately 590 acre-feet annually in low water years), one reservoir (180 acre-feet of capacity), and groundwater (see Section 2.0 for minor revisions to the DEIR that update information on Northstar Community Services District facilities). The Northstar ski resort does not track specific water allocations to individual ski runs/lifts for snowmaking. As noted above, snowmaking varies based on winter weather conditions and existing natural snow conditions, as well as evaluations done on-site to determine the ski runs that require snowmaking. DEIR pages 13-10 through -13 provide an extensive description of groundwater conditions in Martis Valley as well as Northstar. DEIR pages 14-16 and -17 identify that there is adequate groundwater recharge in the long-term to accommodate build out of the Martis Valley region.

- Install piezometers in and around the Northstar Village area, including those immediately above and adjacent to and on the Aspen Grove property and the NPOA recreation center to establish baseline groundwater levels and to document the relationship between increased snowmaking and groundwater levels.

As shown in DEIR Figure 3-7, the proposed NMMP components are spread throughout the Northstar property and are generally located one-half mile or more from the Aspen Grove property or NPOA recreation center. Snowmaking does not add new water to the hydrologic conditions of Northstar per se, but rather supplements natural snow conditions that might occur during abnormally low precipitation years. Snowmaking data for years 2002 through 2012 have ranged from a high of 533.56 acre-feet in 2012 (during the second year of statewide drought conditions) to a low of 93.66 acre-feet in 2002 (wet year conditions), with snowmaking water demands averaging 229.1 acre-feet during this period (Hall 2014a). Snowmaking is therefore only a partial supplement to normal snow conditions, and generally only occurs within ski trails (where the snowmaking facilities are located) and not across the entire mountain. Thus, there would be no expected increase in groundwater on the mountain overall beyond what would typically occur naturally over any given season. Therefore, given the scattered distribution of proposed NMMP snowmaking facilities on the mountain, the fact that snowmaking would be supplemental – generally employed only during years of low precipitation, and the overall distance of the snowmaking facilities from the Aspen Grove property and NPOA recreation

center, the suggested focused analysis of groundwater conditions around the Northstar Village area is not considered relevant to conditions associated with the proposed NMMP project.

- Conduct an in-depth analysis of surface water flows, including a baseline depicting existing surface water flows and drainage, and how flows will be altered with project implementation.

DEIR pages 13-2 through -10 provide a description and mapping of the general area-wide watershed, while DEIR pages 13-35 and -36 provide quantification of existing and post-project 10-year and 100-year flood flows (DEIR Table 13-4) based on the Northstar Mountain Master Plan Draft Preliminary Drainage Report provided in DEIR Appendix 13. In addition, the Addendum Memorandum (NMMP-Drainage Influence on Aspen Grove Condominiums) provides quantification of existing and post-project 2-, 5-, 10-, 25-, and 100-year flows in Watershed 1, which is the common watershed shared by the NMMP project and the Northstar Village drainage system (most of the NMMP project occurs outside of this common watershed). With the mitigations proposed as part of the NMMP project, mitigations that will occur on-site, before any surface water leaves the NMMP property, will ensure that the NMMP property, post-project, will not increase surface water flows to the Northstar Village WQ Basin relative to current, existing conditions.

CEQA Guidelines Section 15125(a) identifies that the physical conditions that exist at the time of the Notice of Preparation is published normally constitute the baseline. The DEIR Notice of Preparation was published on November 6, 2012, and the drainage technical analyses that was used in the preparation of DEIR Section 13, Hydrology and Water Quality, were completed in June 2013 and September 2013 consistent with CEQA Guidelines Section 15125(a).

While an e-mail from Stantec Consultants (see Comment Letter GG) refutes portions of the drainage analysis contained in the DEIR, no countering technical analysis to the DEIR was provided to support that position.

Drainage analysis does not factor impact on drainage related to proposed NMMP increased snowmaking.

The comment letters state that the DEIR fails to address additional drainage impacts from the expansion of snowmaking operations on the Northstar ski resort. These comments specifically note that the water for snowmaking could result in additional drainage impacts. In addition, comments state that the impact of the removal of trees would increase the amount of drainage flows from the mountain.

The DEIR does identify that the full buildout of the proposed NMMP snowmaking facilities in combination with estimates of current snowmaking facilities could increase the Northstar ski resort's total snowmaking water use to 531 acre-feet annually on average based on updated snowmaking estimates from the applicant (DEIR page 13-40 originally estimated 463 acre-feet annually). However, the amount of water utilized for snowmaking annually varies depending on winter weather conditions (e.g., calm winds and temperatures appropriate for making snow) and the extent of precipitation that occurs in a given year (see DEIR page 13-40). Snowmaking data for years 2002 through 2012 have ranged from a high of 533.56 acre-feet in 2012 (during the second year of statewide drought conditions) to a low of 93.66 acre-feet in 2002 (wet year conditions), with snowmaking water demands averaging 229.1 acre-feet during this period (Hall 2014a). Snowmaking does not add new water to the hydrologic conditions of Northstar per se. Rather, it partially supplements natural snow conditions during abnormally low precipitation years. Therefore, snowmaking would typically not result in additional snowpack on the mountain

above and beyond what nature would otherwise already provide under normal conditions. Additionally, snowmaking would only occur within ski trail areas (where the snowmaking facilities are located) and not across the entire mountain. Thus, there would be no expected increase in groundwater and hydrology on the mountain as a result of snowmaking operations associated with this project.

Pages 8 through 12 of the Northstar Mountain Master Plan Draft Preliminary Drainage Report identify the drainage design criteria utilized in the drainage impact analysis that evaluated impacts for 10- and 100-year storm conditions (2-, 5-, 10-, and 25-year storm events were utilized in the Addendum Memorandum) based on snow and no snow (rain) conditions, changes in infiltration rates from new impervious surfaces and tree removal, and average precipitation conditions provided in DEIR Appendix 13. The design criteria used in the drainage impact analysis would encompass dry winter conditions (lower drainage flow conditions) when snowmaking has been utilized. Thus, the expansion of snowmaking associated with the proposed NMMP would not change the conclusions of the drainage impact analysis in the DEIR.

Improper deferral of mitigation for drainage impacts.

The comment letters state that mitigation measures 13-3a, 13-3b, and 13-3c improperly defer mitigation of the impacts in violation of CEQA and refer to published case law (*San Franciscans for Responsible Growth v. City & County of San Francisco* [1984] 151 Cal.App.3d 61, 79, *Sundstrom v. County of Mendocino* [1988] 202 Cal.App.3d 296, 306-08, *Communities for a Better Environment v. City of Richmond* [2010] 184 Cal.App.4th 70).

CEQA Guidelines Section 15126.4(1)(B) allows mitigation measures to utilize performance standards to mitigate a significant effect that may be accomplished in more than one specified way as long as the lead agency commits to the mitigation and identifies in the EIR how the mitigation could be accomplished. The use of performance standards in mitigation is supported by published case law (*Save Panoche Valley v. San Benito County* [2013] 217 Cal.App.4th 503, *North Coast Rivers Alliance v. Marin Municipal Water District Board of Directors* [2013] 216 Cal.App.4th 614, *Defend the Bay v. City of Irvine* [2004] 119 Cal.App.4th 1261, 1275, and *Sacramento Old City Ass'n v. City of Sacramento* [1991] 229 Cal.App.3d 1011).

Unlike the circumstances involving the *Sundstrom v. County of Mendocino* and *Communities for a Better Environment v. City of Richmond* cases, the DEIR provides an analysis of drainage impacts based on technical analysis contained in the Northstar Mountain Master Plan Draft Preliminary Drainage Report and the Addendum Memorandum (DEIR Appendix 13) and quantifies changes in on-site drainage conditions from the NMMP (see DEIR Table 13-4). Mitigation measures 13-3a through 13-3c are intended to work together to ensure that any on-site changes in surface water drainage flows from the NMMP would be appropriately mitigated such that there would be no changes, once those flows reach the project limits, in off-site drainage characteristics relative to existing conditions. Mitigation measure 13-3a requires the provision of a Final Drainage Report as part of final Improvement Plan submittal (Improvement Plans are detailed engineered plans of the final design of the project improvements that include details on grading, tree removal, drainage improvements, and related improvements) of the NMMP components to confirm expected changes in surface water drainage conditions. Mitigation measure 13-3b requires that drainage improvements associated with the final design of the NMMP components mitigate flows to conditions that are equal to or less than pre-project conditions, with specific focus on flows in the 178-acre common watershed (Watershed 1-F). The Addendum Memorandum provides a technical analysis that mitigation in the form of soil management and revegetation of the ski trails and the construction of retention/detention facilities could offset project surface water flows under the 2-, 5-, 10-, 25-, and 100-year storm events in the common watershed (see DEIR Appendix 13, Table 3 of the Addendum Memorandum), thus

demonstrating that the performance standards identified in mitigation measure 13-3b are feasible. Further, mitigation measure 13-3c requires annual monitoring to ensure proper function of the NMMP drainage improvements. Should the proposed NMMP project be approved, these mitigation measures would be adopted and would become binding on the project.

Failure to provide feasible mitigation measures to mitigate significant drainage impacts.

The comment letters identify that the DEIR fails to consider a feasible mitigation measure for drainage impacts to downhill properties that would involve the removal of the existing water quality basin at the Northstar Village and no further diversion of water from Northstar's uphill property onto Aspen Grove property.

As identified above, the DEIR already includes feasible mitigation measures identified to address any potential proposed NMMP drainage impacts (mitigation measures 13-3a through 13-3c), and the DEIR concludes that these measures will reduce any potential project increases to drainage flows to the Northstar Village WQ Basin and downhill Aspen Grove subdivision to a less than significant level.

CEQA Guidelines Section 15126.4(a)(4)(B) identifies that mitigation must be "roughly proportional" to the impacts of the project. CEQA does not require mitigation of existing impacts on the environment. Nothing in the drainage study for the proposed NMMP project indicates an increase in flows into the WQ Basin. To ensure no potential increase occurs, additional mitigation measures have been imposed (mitigation measures 13-3a through 13-3c). The County finds no nexus between the potential drainage impacts of the proposed NMMP project and the suggested mitigation measure to remove the WQ Basin. As a result, the County concludes that a mitigation measure to remove the existing WQ Basin is not warranted under CEQA. As a result under CEQA Guidelines Section 15126.4(a)(5), the DEIR need not analyze this proposed mitigation measure further.

Master Response 2 – Transportation Analysis

Several comment letters (2, 4, 23, 34, 44, AA, DD, EE, FF, and GG) express concerns regarding the adequacy of the traffic impact analysis provided in the DEIR. Specific concerns responded to in this master response include the following:

- Failure to adequately estimate the extent of new traffic generated from expansion of the Northstar ski resort, and should utilize Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition, or trip generation calculations utilized in the Homewood Mountain Resort Ski Area Master Plan Draft EIR/EIS.
- Improper determination of baseline winter average daily traffic volumes on Northstar Drive.
- Failure to adequately address impacts of increased parking demand.
- Inadequate analysis of cumulative traffic impacts factoring other development in the area.
- Inadequate analysis of the extent and destination of vehicle miles traveled into the Lake Tahoe Basin.
- Failure to address traffic impacts from Martis Camp development traffic utilizing the emergency vehicle access connection between Northstar and Martis Camp.

Each of these issues is responded to below.

Failure to adequately estimate the extent of new traffic generated from expansion of the Northstar ski resort.

Peak-Hour Traffic

The comment states that the traffic analysis should be revised using standard ITE trip generation rates for snow ski areas. The ITE Trip Generation Manual, 8th Edition, (which Placer County has adopted) does not include the ski area land use type. The 9th Edition of the manual (which the County has not adopted) provides peak-hour trip generation rates for a snow ski area based on the number of lifts. However, the trip rates are based on only one sample. According to the ITE manual, “Caution should be used when applying the trip generation rates as the number of lifts is not a definitive independent variable in estimation of the trip generation rates of this land use.”

The traffic analysis used in the DEIR is based on Northstar-specific traffic and parking count data that has been collected since the 2000–2001 ski season as well as data collected at Squaw Valley (a resort destination west of Northstar that consists of a single roadway access and has been developed as a year-round destination resort), limitations on parking capacity at Northstar (day skier parking is limited to a maximum 2,500 spaces at the resort [fewer parking spaces are available during storm conditions when vehicles are spaced farther apart to accommodate ice and snow conditions that inhibit vehicle movement as well as space availability] and there are no other parking areas available to day skiers within a mile of Northstar). As described on DEIR pages 9-6 and -7, the winter peak-hour traffic analysis is based on traffic conditions during the 30th highest peak-hour when parking facilities at Northstar are full. During the 30th highest peak-hour, there is no parking to accommodate additional day skiers who may be attracted to the improved ski terrain conditions. The EIR traffic consultant, LSC, used peak-hour traffic counts conducted at the State Route (SR) 267/Northstar Drive intersection on Saturday, January 15, 2011, as a basis for estimating the 30th highest peak-hour traffic volumes along Northstar Drive. All Northstar day skier parking lots were completely full on this date. In fact, January 15, 2011, was the second biggest skier visit day Northstar has ever experienced, and the next day (Sunday, January 16) was the biggest skier visit day ever at Northstar. The 30th-highest hour of traffic on SR 267 in the winter typically occurs within the top 10 days of winter traffic on SR 267. For instance, the 30th-highest peak-hour during the winter of 2010/2011 corresponded to the 7th-highest winter day of traffic. The 30th-highest peak-hour during the winter of 2011/2012 occurred on the 2nd-highest winter day of traffic. Based on a review of Northstar’s skier parking summary for the 2010/2011, 2011/2012, and 2012/2013 ski seasons, the skier parking facilities were full for an average of 16 days per season. Considering that the skier parking facilities are typically full for more than 10 days in the winter, it is reasonable to assume the skier parking facilities are full on the day with the 30th-highest hour of traffic on SR 267.

Using hourly traffic count data provided by Caltrans for the entire 2010/2011 winter season, LSC increased these peak-hour counts by 15 percent in order to adjust the traffic volumes to the 30th highest peak-hour design period. LSC then balanced traffic volumes through the adjacent Northstar Drive/Castle Peak Parking Access/Ridgeline Drive roundabout and the Northstar Drive/Big Springs Drive intersection to reflect the 30th highest peak-hour conditions. Based on parking activity that day, the traffic analysis was run on a day when parking was completely full at Northstar, supporting the methodology used in the EIR (Hall 2014b; Hawley 2014a). This circumstance does not occur during the summer peak-hour conditions for NMMP project-level and program-level components where there is no parking limitation and the traffic analysis factors increases in visitation (see DEIR page 18-15). Thus, the DEIR traffic analysis is

considered by the County to be the most accurate method to address summer and winter peak-hour traffic conditions.

The proposed NMMP has been designed to accommodate both a day skier population and the destination-oriented guest. Given the approved bed-base and commercial venues, the proposed project is designed to extend the vacation experience for the destination visitor and help Northstar remain competitive with local Tahoe area ski resorts. Recent changes to the area on and around Northstar reflect an industry shift among ski resorts in the Tahoe area from day skier sites to destination ski resorts. The proposed NMMP reflects this trend and would provide important support for recently entitled and constructed residential and lodging units on and near the Northstar site. However, since the improvements are intended to support the expanded destination skiers, no new day skier parking is proposed as a part of this project.

The applicant anticipates that although the number of day skier parking spaces would not increase, there would be an increase in overall resort visitation given the new and approved but yet to be developed residential units (up to 2,640 residential units within and adjacent to Northstar; see DEIR Table 3-3). The traffic impacts of these development projects were already addressed in the following certified EIRs:

- Northstar Village EIR (State Clearinghouse No. 2001012081)
- Northstar Highlands EIR (State Clearinghouse No. 2003012086)
- Northside EIR (State Clearinghouse No. 2004112009)
- Retreat Subdivision EIR (State Clearinghouse No. 2003032042)
- Siller Ranch (now known as Martis Camp) EIR (State Clearinghouse No. 2003022122)

The use of parking space limitations for traffic impact analysis has been used in the following recent ski resort–related EIRs:

- Dyer Mountain Resort Draft EIR Appendix G1, Traffic Impact Analysis (see Tables 10a and 11a)
- Homewood Mountain Resort Ski Area Master Plan Final EIR/EIS (see pages 11-39 through -50)

This is similar to the condition at other major ski resorts (such as Beaver Creek and Aspen Mountain in Colorado) where parking supply is constrained.

None of the comment letters include a traffic technical analysis with conclusions that counter the conclusions of the DEIR and its traffic analysis for peak-hour conditions.

Non-Peak-Hour Traffic

Northstar has had three major ski terrain improvement projects (Lookout Mountain, Northstar-at-Tahoe Mountain Improvements Project, and the S Pod) approved since 2000 that added over 150 acres of new ski terrain and related facilities at the resort. However, Northstar has not observed dramatic changes in day skier attendance or parking demands due to the offering of new ski terrain and facilities as evidenced by average day skier parking counts for the season (2000-2001 average day skier parking was 1,270 vehicles as compared to the 2012–2013 season average day skier parking of 1,346 vehicles [LSC 2001; Hawley 2014b]). Visitor numbers are a product of the quality of the snow conditions, the timing of snow storms, weather conditions market demand, holidays, and other factors that are beyond the control of the resort. Thus, it is not anticipated that

the proposed NMMP would dramatically alter day skier attendance given parking data over the past 10 years.

However, it is acknowledged that the new ski terrain offering may induce day skiers to come to Northstar rather than to other ski resorts in the region (e.g., Boreal Ridge, Squaw Valley, Alpine Meadows, Sugar Bowl, and Homewood) during non-peak conditions when there is available parking in Northstar's day skier parking facilities. The following assumptions were used to determine the possible extent of additional day skier traffic during the non-peak conditions.

**TABLE 1-1
ASSUMPTIONS FOR POTENTIAL DAY SKIER TRAFFIC
DURING NON-PEAK CONDITIONS**

Steps in the Development Trip Generation Estimate	Technical Evidence Supporting Estimate
<p>Step 1: Estimate total number of potential new skiers:</p> <ul style="list-style-type: none"> • Skier capacity per acre = 6.31 skiers¹ • NMMP project-level new ski terrain estimate = 295.5 acres² • NMMP program-level new ski terrain = 92.5 acres² • 6.31 skiers x 295.5 acres = 1,865 skiers (capacity) for project level • 6.31 skiers x 92.5 acres = 584 skiers (capacity) for program level • 2,449 total new skier capacity 	<p>¹ Northstar-at-Tahoe Mountain Improvements Project Draft EIR</p> <ul style="list-style-type: none"> • Increase in skier capacity = 620 (Table 4.11-2) • Acres of new ski terrain = 98.2 acres (Table 3.2-1) • 642 new skiers /98.2 acres = 6.31 skiers per acre <p>² NMMP Draft EIR</p> <ul style="list-style-type: none"> • New ski terrain = 388 acres (project level = 295.5 acres and program level = 92.5 acres – Table 3-5)
<p>Step 2: Estimate how many skiers of the 2,449 total new capacity would ski on an average day:</p> <ul style="list-style-type: none"> • Based on average visitation data from Northstar, average day skier visitation is 34% of peak day skier visitation based on the Northstar-at-Tahoe 2000–2001 Winter Season Traffic Monitoring Program • An additional 5% was added to the 34% to factor the varied improved and new terrain offerings of the proposed NMMP that would be offered mountain-wide that could provide further incentive to visit Northstar during an average day in order to conservatively estimate the potential impact of the NMMP • Assume that 2,449 total new skier capacity is equivalent to maximum ski day • 0.39 x 2,449 total new skier capacity = 955 potential new skier visits on an average day 	
<p>Step 3: Estimate traffic generated by potential new day skiers during off-peak:</p> <ul style="list-style-type: none"> • 2.8 skiers per vehicle (based on Northstar ski visitation data)/955 day skiers = 341 round trips or 682 one-way trips 	

Steps in the Development Trip Generation Estimate	Technical Evidence Supporting Estimate
Note: Average skier parking lot count for the 2012–2013 season was 1,346 (capacity of the lots is 2,500). Thus, the parking lot would have capacity to accommodate this.	

As shown in the above table, it is estimated that the proposed NMMP at buildout could generate 341 daily round trips or 682 daily one-way trips during non-peak traffic conditions when adequate day skier parking is available at Northstar.

Based on a review of roadway and intersection traffic volumes and associated level of service in the EIR traffic analysis for winter peak-hour conditions, the addition of 341 daily one-way trips would not trigger a level of service impact on project area roadways and intersections during off-peak conditions. These traffic volumes are also not high enough to alter the traffic noise analysis provided in the DEIR (which was based on peak traffic conditions), as a doubling of traffic volumes is typically required to result in a change in traffic noise levels.

This additional traffic volume was added into the operational air quality and greenhouse gas analyses in Sections 10 and 16 of the DEIR; the results are provided in the revised DEIR Tables 10-6 and 16-6 below. Corrections to the modeling regarding trip generation errors were also corrected in these tables. As shown in these tables, the consideration of the additional emissions from this traffic would not exceed Placer County Air Pollution Control District project (82 pounds per day of reactive organic gases [ROG] and nitrogen oxides [NOx]) and cumulative (10 pounds per day of ROG and NOx) thresholds for air pollutant emissions. The additional greenhouse gas emissions would not alter the significant impact conclusion of the Draft EIR and would still be mitigated with implementation of mitigation measure 16-1.

**DEIR TABLE 10-6
TOTAL LONG-TERM UNMITIGATED EMISSIONS**

Emissions Source	Pollutant (pounds/day)			
	ROG	NOx	PM10	PM2.5
Project-Level Components				
<i>Summer Emissions (generated from an increase of 54 30 total trips)</i>				
Total Operational Emissions	0.27-0.07	0.20-0.11	0.19-0.11	0.05-0.03
PCAPCD Threshold (lbs/day)	82	82	82	None
Threshold Exceeded Before Mitigation?	No	No	No	N/A
<i>Winter Emissions (generated from an increase of 386 890 total trips)</i>				
Total Operational Emissions	2.13-2.03	1.60-3.70	1.41-3.27	0.39-0.91
PCAPCD Threshold (lbs/day)	82	82	82	None
Threshold Exceeded Before Mitigation?	No	No	No	N/A
Project- and Program-Level Components				
<i>Summer Emissions (generated from an increase of 208 188 total trips)</i>				
Total Operational Emissions	1.06-0.46	0.77-0.70	0.76-0.69	0.21-0.19
PCAPCD Threshold (lbs/day)	82	82	82	None

Emissions Source	Pollutant (pounds/day)			
	ROG	NOx	PM10	PM2.5
Threshold Exceeded Before Mitigation?	No	No	No	N/A
<i>Winter Emissions (generated from an increase of 524 1,066 total trips)</i>				
Total Operational Emissions	2.89 <u>2.43</u>	2.18 <u>4.44</u>	1.92 <u>3.91</u>	0.53 <u>1.09</u>
PCAPCD Threshold (lbs/day)	82	82	82	None
Threshold Exceeded Before Mitigation?	No	No	No	N/A

Source: CalEEMod Model v. 2013.2.2

**DEIR TABLE 16-6
UNMITIGATED OPERATIONAL EMISSIONS**

Emission Source	Maximum Emissions (metric tons/year)			
	Carbon Dioxide (CO2)	Methane (CH4)	Nitrous Oxide (N2O)	CO2e
Project-Level Components				
Construction Amortized over 30 Years	76	0	0	76
Forestland Change Amortized over 30 Years	1,169	0	0	1,169
Energy ¹	6,448	0.1	0	6,460
Mobile ⁴ (440 new trips)	291 <u>302</u>	0	0	291 <u>302</u>
Total	6,739 <u>7,995</u>	0.1	0	7,996 <u>8,007</u>
GHG Significance Threshold				1,150
Program-Level Components				
Construction Amortized over 30 Years	27	0	0	27
Forestland Change Amortized over 30 Years	427	0	0	427
Energy ²	2,063	0.04	0	2,067
Mobile ⁴ (292 new trips)	194 <u>113</u>	0	0	194 <u>113</u>
Total	2,711 <u>2,630</u>	0.04	0	2,715 <u>2,634</u>
GHG Significance Threshold				1,150
Project- and Program-Level Total				
Construction Amortized over 30 Years	103	0	0	103
Forestland Change Amortized over 30 Years	1,596	0	0	1,596

Emission Source	Maximum Emissions (metric tons/year)			
	Carbon Dioxide (CO2)	Methane (CH4)	Nitrous Oxide (N2O)	CO2e
Energy ³	8,511	0.14	0	8,527
Mobile ⁴ (732 new trips)	485 <u>415</u>	0	0	485 <u>415</u>
Total	10,695 <u>10,625</u>	0.14	0	10,711 <u>10,641</u>
GHG Significance Threshold				1,150

Source: CalEEMod Model v. 2013.2

1. Accounts for an increase in electricity consumption of 5,349,777 kilowatt hours/year.

2. Accounts for an increase in electricity consumption of 1,712,414 kilowatt hours/year.

3. Accounts for an increase in electricity consumption of 7,062,191 kilowatt hours/year.

4. Accounts for differing summer and winter average daily trip rates. (daily summer emissions x 183 days) + (daily winter emissions x 183 days)

Improper determination of baseline winter average daily traffic volumes on Northstar Drive.

Comment letters express concerns that the traffic analysis uses Squaw Valley data rather than taking counts on Northstar Drive to determine volumes for the impact analysis and opine that is not a proper baseline.

The winter average daily trips (ADT) were estimated based on winter peak-hour traffic counts conducted on Northstar Drive. These counts were factored up to a total daily volume using a daily-to-peak-hour factor from counts on Squaw Valley Road. The Squaw Valley counts were only used for the purposes of deriving this factor. That is, it is assumed that the ratio of daily-to-peak-hour traffic along Squaw Valley Road in the winter is similar to the ratio of daily-to-peak-hour traffic on Northstar Drive. Since release of the Draft EIR, LSC obtained daily winter traffic counts that were taken on Northstar Drive near Big Springs Drive approximately 4 years ago. The ADT-to-peak-hour factor based on these counts is lower than the factor used in the Draft EIR. Thus, the Draft EIR traffic impact analysis provides a conservative analysis, and the use of the Northstar Drive winter traffic counts identified above would not alter the conclusions of the Draft EIR.

Failure to adequately address impacts of increased parking demand.

Comment letters state that the DEIR traffic analysis fails to adequately estimate the extent of traffic that would be generated by expansion of Northstar’s ski terrain and thus fails to address parking impacts of the NMMP.

The DEIR addresses parking impacts of the proposed NMMP on DEIR pages 9-42 and -43 and pages 16-29 and -30. Northstar has had three major ski terrain improvement projects (Lookout Mountain, Northstar-at-Tahoe Mountain Improvements Project and S Pod) approved since 2000 that added over 150 acres of new ski terrain and related facilities at the resort. However, Northstar has not observed dramatic changes in day skier attendance or parking demands due to the offering of new ski terrain and facilities as evidenced by average day skier parking counts for the season (2000-2001 average day skier parking was 1,270 vehicles as compared to the 2012–2013 season average day skier parking of 1,346 vehicles [LSC 2001; Hawley 2014b]). Visitor numbers are a product of the quality of the snow conditions, the timing of snow storms, weather conditions market demand, holidays, and other factors that are beyond the control of the resort. Thus, it is not anticipated that the proposed NMMP would dramatically alter day skier attendance given parking data over the past 10 years.

As stated above, and also in the DEIR Project Description, the increasing bed base generated by approved, but unconstructed residential and lodging units within Northstar Highlands (and other Northstar projects) development will provide new skiers to the mountain, but will do so while also providing increased parking to serve those units. In essence, increased parking facilities have already been approved for the destination skiers that will visit Northstar, and these new parking facilities will be provided through the required on-site parking spaces, on a unit-by-unit basis as the previously approved residential and lodging development projects are built out.

Additionally, the parking facilities at Northstar have been at capacity on average 16 days a year during the ski season (approximately 181 days) between the years 2010 and 2013, which is less than ten percent of the total days of the ski season (Northstar California 2014b). These peak days primarily occurred during holiday periods (e.g., Christmas, New Years, Martin Luther King weekend, and Presidents Day weekend). Therefore, the following can be assumed: 1) Northstar currently provides sufficient parking to its guests, 2) the existing day-skier parking will be supplemented by the approved destination skier parking being constructed with new residential and lodging units and, 3) the busiest ski days at Northstar, will continue to be holidays and a few peak weekends, leaving 90 percent of the remaining days of the ski season with reduced guest counts and ample parking (**Table 1-1**). Based on these factors, an expansion of on-site parking is not warranted.

As identified in the DEIR, Northstar implements the Northstar Traffic and Parking Management Plan that manages traffic flows, provides for efficient use of parking facilities, avoids illegal parking, and directs skiers away from Northstar when the parking lot is full (DEIR pages 3-34 through -39 and Appendix 3.2). As no physical parking improvements for day skier parking are proposed for the NMMP or the Northstar Traffic and Parking Management Plan, no environmental impacts would occur that would need to be addressed in the DEIR.

Inadequate analysis of cumulative traffic impacts factoring other development in the area.

Several comment letters state that the DEIR failed to address the cumulative traffic impacts on State Route 267 and the west shore of Lake Tahoe and specifically reference the Martis Valley West Parcel Specific Plan/Martis West Area Plan project.

The cumulative setting was identified on DEIR pages 18-1 through -3. The cumulative setting for the proposed project includes all past, present, and probable future development as identified in the Placer County General Plan Update EIR, the Martis Valley Community Plan EIR, the Town of Truckee General Plan Update EIR, the Nevada County General Plan Update EIR, and the Tahoe Regional Planning Agency (TRPA) Regional Plan Update EIS. In addition, DEIR Table 18-1 provides the status of large-scale development projects in eastern Placer County, including Truckee. This list of projects was utilized in the development and analysis of the cumulative settings for the project. Please note that this list is not intended to be an inclusive list of all projects in the region.

At the time of the release of the Notice of Preparation, Placer County had not received an application for the proposed Martis Valley West Parcel Specific Plan/Martis West Area Plan (MVWSP) project. However, the MVWSP Environmental Questionnaire was submitted to Placer County in September 2013, and the Notice of Preparation for the EIR was released on March 28, 2014. The proposed Martis Valley West Parcel Specific Plan/Martis West Area Plan project would involve the shifting of existing residential and commercial allowed development (based on zoning and land use designations under the Martis Valley Community Plan) from east of State Route 267 to 775 acres west of SR 267 near Brockway Summit. The extent of allowed development under the Martis Valley Community Plan would be reduced from 1,360 dwelling

units and 6.6 acres of commercial uses to 760 residential units and 6.6 acres of commercial. This project involves East-West Partners and Sierra Pacific Industries and is located on lands outside the ownership and management of the NMMP project applicant.

As identified on DEIR pages 18-8 and -9, the cumulative traffic impact analysis for summer and winter conditions was based on assumed buildout of the Martis Valley Community Plan (which includes the 1,360 dwelling units and 6.6 acres of commercial uses proposed to be shifted), which overstates the extent of traffic generated from development under the proposed Martis Valley West Parcel Specific Plan/Martis West Area Plan project as part of the cumulative impact analysis.

Inadequate analysis of the extent and destination of vehicle miles traveled into the Lake Tahoe Basin.

Comment letters express concerns that the DEIR fails to fully address the extent of increased vehicle miles traveled (VMT) within the Lake Tahoe Basin from an underestimation of trips generated by employees and visitors associated with Northstar. These comment letters note that the proposed NMMP would provide an expanded recreational attraction near Lake Tahoe that will entice growth and associated trips into the basin.

DEIR pages 9-40 and -41 and pages 18-27 and -28 identify that project- and program-level components of the NMMP would not exceed the Tahoe Regional Planning Agency's VMT threshold. The proposed NMMP has been designed to accommodate both a day skier population and the destination-oriented guest. Given the approved bed-base and commercial venues, the proposed project is designed to extend the vacation experience for the destination visitor within Northstar rather than having visitors leave Northstar for other destinations (such as the Lake Tahoe Basin). The DEIR does identify that project employees during the winter season and employees and guests during the summer season would contribute (though not significantly) to the VMT in the Lake Tahoe Basin.

The applicant anticipates that although the number of day skier parking spaces would not increase, there would be an increase in overall resort visitation within Northstar given the new and approved but yet to be developed residential units (up to 2,640 residential units within and adjacent to Northstar; see DEIR Table 3-3). It is acknowledged that these development projects could generate vehicle trips into the Lake Tahoe Basin. The traffic impacts of these development projects within the basin were already addressed in the following certified EIRs:

- Northstar Village EIR (DEIR Section 4.4) (State Clearinghouse No. 2001012081)
- Northstar Highlands EIR (DEIR Section 4.4) (State Clearinghouse No. 2003012086)
- Northside EIR (DEIR Section 4.4) (State Clearinghouse No. 2004112009)
- Siller Ranch (now known as Martis Camp) (DEIR Section 4.4) EIR (State Clearinghouse No. 2003022122)

As noted above in **Table 1-1**, the proposed NMMP at buildout could generate 341 daily round trips or 682 daily one-way trips during non-peak traffic conditions when adequate day skier parking is available at Northstar. However, the destination of these day trips is the Northstar ski resort; the day trips are not expected to generate additional recreational-related traffic in the Lake Tahoe Basin. Non-peak day skier trips are not expected to travel into the Lake Tahoe Basin as day skiers consist of people generally within a 1-3 hour driving distance to Northstar and are familiar with Lake Tahoe rather than a guest from outside this travel distance that are staying in

housing at Northstar. These day skiers sole destination is the ski resort and to return home. In addition, the Lake Tahoe Basin has limited recreation amenities during the winter that would draw a day skier after a day of skiing at Northstar. Even if these trips were to enter the Lake Tahoe Basin, they would not exceed the Tahoe Regional Planning Agency's VMT threshold. The VMT threshold is 2,067,568, which is 10% reduction of base 1981 peak summer day levels (VMT is the highest during the summer months). The TRPA 2011 Threshold Evaluation Report identifies the Lake Tahoe Basin is in compliance with VMT in 2011 at 2,036,642 (VMT threshold compliance is based on traffic measurements at 20 locations taken during the 2nd weekend in August since 1981). It should also be noted that the TRPA Regional Plan Update EIS identified that potential increases to VMT from land uses under the Regional Plan Update would not exceed the VMT Threshold with the implementation of mitigation measure 3.3-3 (EIS page 5-30).

Failure to address traffic impacts from Martis Camp development traffic utilizing the emergency vehicle access connection between Northstar and Martis Camp

The operation of the emergency vehicle access between Martis Camp and Northstar was not considered in the analysis of traffic impacts generated by the NMMP. The NMMP does not propose to utilize this access.

Master Response 3 – Lake Tahoe Basin Impacts

Several comment letters (3, 48, AA, BB, and FF) express concerns that the DEIR did not address expected direct (development activities within and immediately adjacent to the basin) and indirect impacts (increased visitation resulting in impacts) to the Lake Tahoe Basin associated with the proposed NMMP. Specific concerns responded to in this master response include the following:

- Increased vehicle miles traveled into the Lake Tahoe Basin would result in air quality, noise, water quality, recreation impacts.
- Impacts of Timberland Production Zone Text Amendment on the Lake Tahoe Basin.
- Project conflicts with Tahoe Regional Planning Agency plans and standards, and the County should prepare a joint EIS-EIR document.

Increased vehicle miles traveled into the Lake Tahoe Basin would result in air quality, noise, water quality, recreation impacts.

Comment letters express concerns that the DEIR fails to fully address the extent of increased vehicle miles traveled (VMT) within the Lake Tahoe Basin from an underestimation of trips generated by employees and visitors associated with Northstar. These comment letters note that the proposed NMMP would provide an expanded recreational attraction near Lake Tahoe that will entice growth and associated trips into the basin. This additional traffic would result in air quality, noise, water quality, and recreation impacts.

As described in Master Response 2, DEIR pages 9-40 and -41 and pages 18-27 and -28 identify that project- and program-level components of the NMMP would not exceed the Tahoe Regional Planning Agency's VMT threshold, which is part of the Lake Tahoe Basin Environmental Threshold Carrying Capacities that are intended to stabilize and improve the environmental conditions of the basin. The 2011 TRPA Threshold Evaluation Report notes that the Lake Tahoe region is in compliance with this threshold with 2,036,642 VMT in the Lake Tahoe Basin in 2011. The proposed NMMP has been designed to accommodate both a day skier population and the destination-oriented guest. Given the approved bed-base and commercial venues, the proposed project is designed to extend the vacation and recreation experience for the destination

visitor within Northstar rather than having visitors leave Northstar for other destinations (such as the Lake Tahoe Basin).

As identified on DEIR page 10-23, long-term emissions associated with the proposed NMMP for project- and program-level components would be below TRPA air quality thresholds for stationary sources provided in TRPA Code of Ordinances Chapter 65.1 (Air Quality Control) and thus are not anticipated to result in significant air quality impacts in the Lake Tahoe Basin (this would include emissions from potential increases in non-peak day skier traffic as shown in Table 10-6 above). In addition to the TRPA Code Ordinance provisions addressing air quality, the Regional Plan and California and Nevada Lake Tahoe Total Maximum Daily Load Programs include measures to address atmospheric deposition of air pollutants to Lake Tahoe.

DEIR Table 18-8 identifies that the proposed NMMP traffic would not alter traffic noise levels on State Route 267 and is not expected to result in new significant noise impacts in the Lake Tahoe Basin, as project traffic volumes entering the basin (67 daily trips in the winter and 33 daily trips; see DEIR Table 18-7) would not be substantial enough to increase traffic noise levels along SR 28.

Impacts of Timberland Production Zone Text Amendment on the Lake Tahoe Basin

Comment letters state that the proposed Zoning Text Amendment could result in the use of Timberland Production Zone (TPZ) lands for future ski areas or expansion of ski areas in the Lake Tahoe Basin.

DEIR page 3-46 identifies that the proposed Zoning Text Amendment would only apply to areas outside of the Lake Tahoe Basin (see **Figure 1-2**) through modification of allowed uses as noted below:

Section 17.16.010(D) (Allowable Land Uses and Permitted Requirements – Timberland Production District) of the Placer County Code to allow the following as a Conditional Use Permit under “Recreation, Education, and Public Assembly Uses”:

Ski lift facilities and ski runs, outside the Lake Tahoe Basin, within land boundaries owned and/or operated by existing ski resorts as of March 15, 2012.

Project conflicts with Tahoe Regional Planning Agency plans and standards, and the County should prepare a joint EIS-EIR document.

Comment letters state that the project must be determined consistent with the Tahoe Regional Planning Agency policies and standards and that a joint EIS-EIR with TRPA should be prepared.

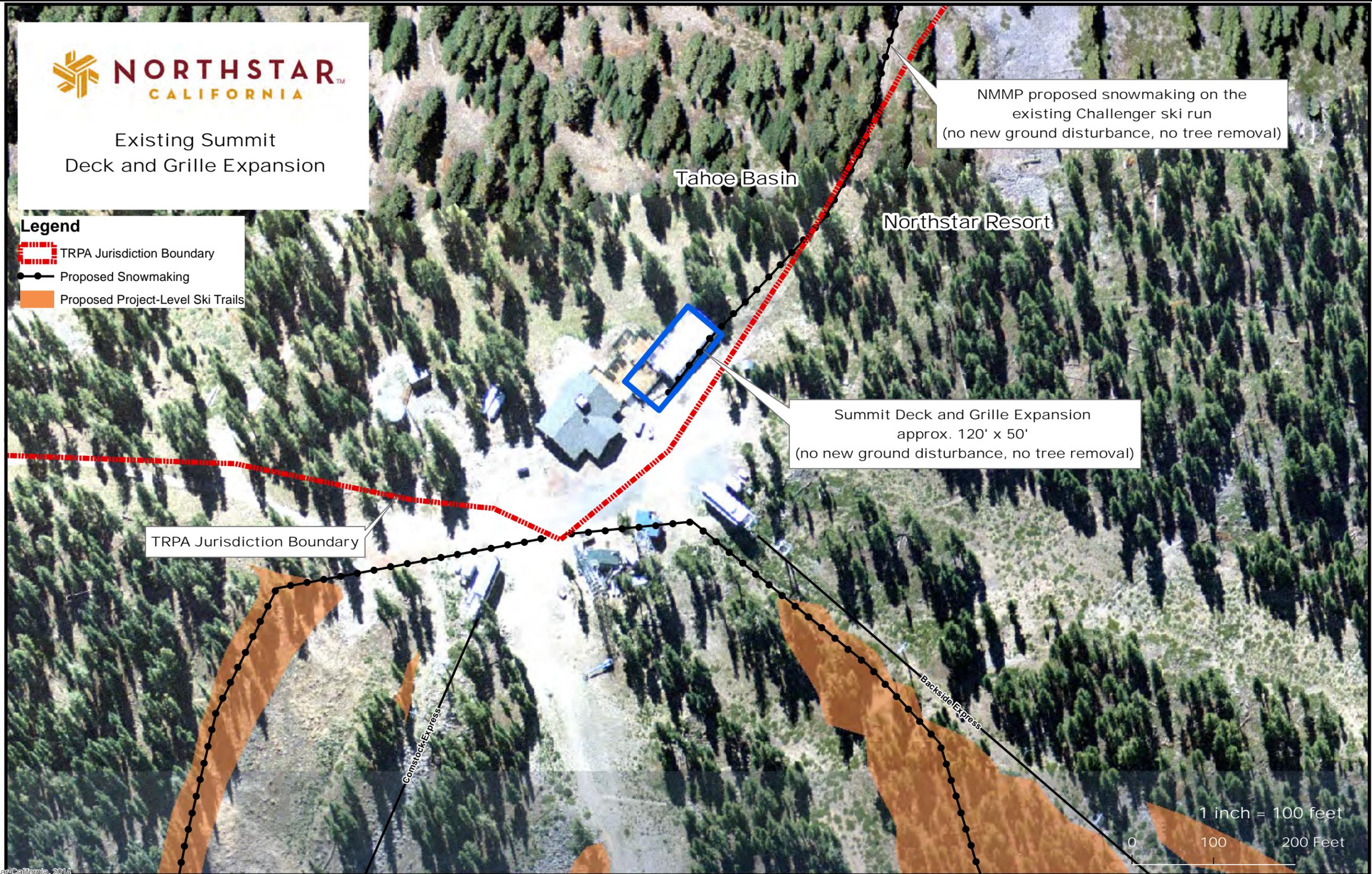
DEIR page 4-3 specifically identifies that the existing Summit Deck and Grille, existing ski trails, and proposed snowmaking facilities at Mt. Pluto are located in the Lake Tahoe Basin, which is under TRPA jurisdiction (DEIR Figure 3-8). This area is within Plan Area Statement 15 (North Star), which designates the area as Recreation and allows skiing facilities as a special use. DEIR page 4-11 identifies that the improvement of these facilities would be consistent with Plan Area Statement 15. The proposed improvements consist of an expansion to the Summit Deck and Grille and a snowmaking line on an existing ski trail. No tree removal or new disturbance is proposed in the Basin. **Figure 1-1** provides further detail of the extent of ski facility improvements in Plan Area Statement 15.



Existing Summit Deck and Grille Expansion

Legend

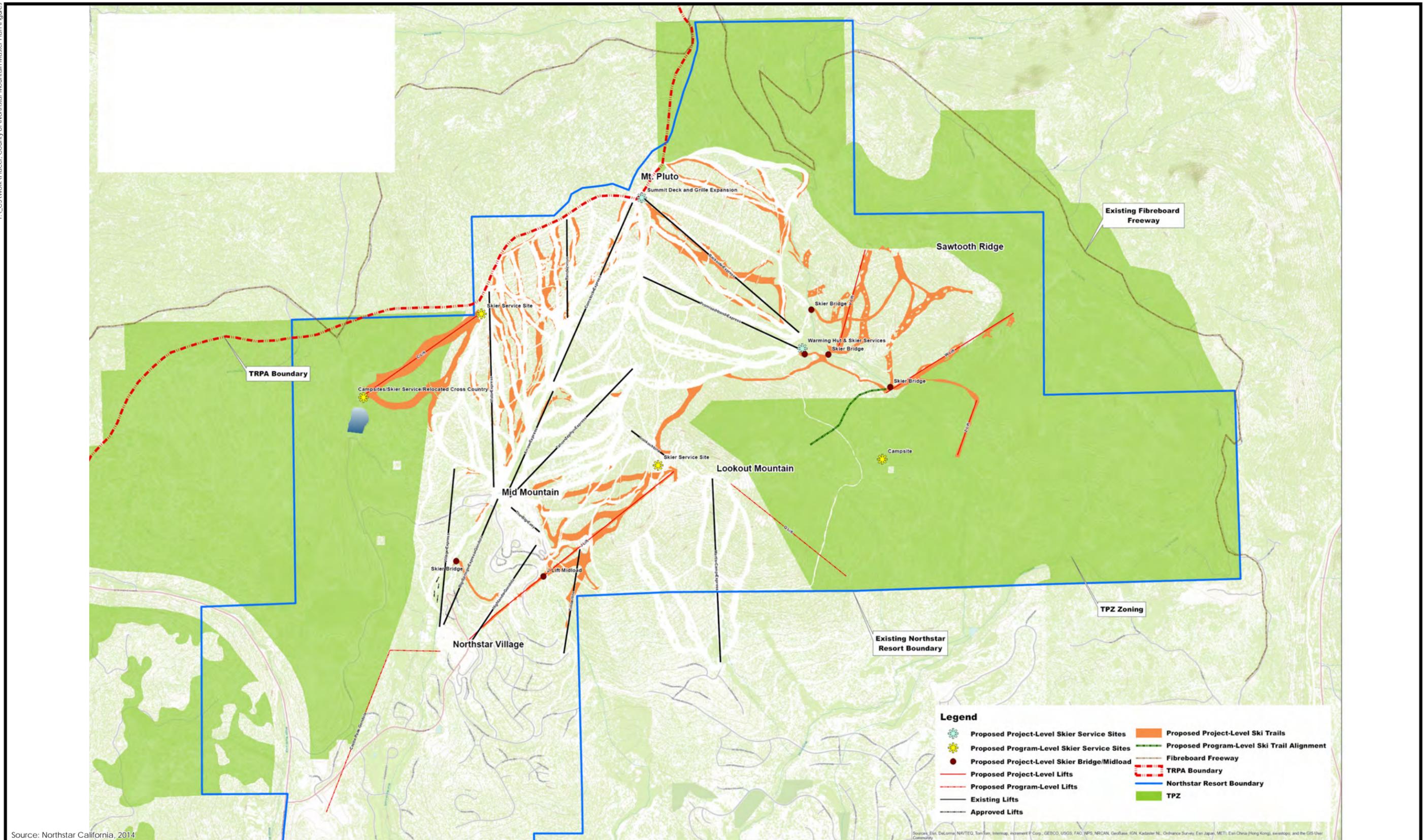
- TRPA Jurisdiction Boundary
- Proposed Snowmaking
- Proposed Project-Level Ski Trails



Source: Northstar California, 2014

Figure 1-1
Proposed Ski Facility Improvements within Plan Area Statement 15





Source: Northstar California, 2014

Source: Esri, DeLorme, NAVTEQ, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, and the GIS User Community

Not To Scale

Figure 1-2
Proposed NMMP Components in Relation to TPZ and Lake Tahoe Basin

In addition, the DEIR identifies that project improvements within Plan Area Statement 15 would be required to comply with the following sections of the TRPA Code of Ordinances (see Section 3.0, Project Description, and Section 8.0, Visual Resources, of the DEIR):

- Chapter 33 (Grading and Construction)
- Chapter 36, Section 36.8 (Exterior Lighting Standards)
- Chapter 36 (Design Standards)
- Chapter 37 (Height)
- Chapter 60 (Water Quality)
- Chapter 65 (Air Quality/Transportation)

Over 90 percent of the project- and program-level components are located outside of the Lake Tahoe Basin and under the jurisdiction of Placer County; thus, the need for a joint Placer County/TRPA environmental document was determined to be unnecessary. The proposed improvements associated with the existing Summit Deck and Grille and existing ski trails would be required to meet the TRPA Code of Ordinances, and these improvements would need to be submitted to TRPA for review and approval prior to construction.

Master Response 4 – Project Segmentation

Several comment letters (2, 4, 10, 34, 44, 48, FF, and GG) state that the DEIR project description fails to include related/dependent projects that are really part of the NMMP and in turn fails to address the impacts of the “whole” of the project. These projects include the Forest Flyer and the Martis Valley West Parcel Specific Plan/Martis West Area Plan. Some of these comments assert that the Draft EIR engaged in “piece-meal” environmental review. “Piece-mealing” claims under CEQA are sometimes referred to as “segmentation” claims. Regardless of the label, the central assertion is the same: the agency’s environmental analysis of a project is too narrow if it omits a necessary part of the project. The concern animating these decisions is that, if an agency narrows unduly its definition of the project under review, the agency may fail to consider the impacts of other aspects of the development scheme that necessarily flow from the project under review.

In order to avoid this problem, CEQA defines the term “project” to encompass “the whole of an action” that may result in either a direct or reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378(a)). In general, the lead agency must analyze fully each “project” in a single environmental review document. Thus, in performing its analysis, the agency should not piece-meal or segment a project by splitting it into two or more segments. This approach ensures “that environmental considerations do not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences” (*Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577, 592).

In keeping with these principles, case law notes that lead agencies should define projects broadly to ensure a complete analysis of impacts and must include consideration of future expansion or other actions that are identified as a reasonably foreseeable consequence of the project (*Laurel Heights Improvement Association v. Regents of the University of California* [1988] 47 Cal.3d 376, 395396 [253 Cal.Rptr. 426] – commonly referred to as “Laurel Heights I”). In *Laurel*

Heights I, the California Supreme Court identified a two-prong test to determine when subsequent actions or future expansions should be considered as part of the initial project. The court’s two-prong test consists of the following:

An EIR must include an analysis of the environmental effects of future expansion or other action if it is a reasonably foreseeable consequence of the initial project; and the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.

As described above, CEQA Guidelines Section 15378(a) and case law define “project” as the whole of the action that has potential for resulting in either direct physical changes in the environment or a reasonably foreseeable indirect physical change in the environment. In addition to this definition, CEQA Guidelines Section 15124 and the Placer County Environmental Review Ordinance define the required content of an EIR project description. The required content of an EIR project description includes the following:

- Identification of the precise location and boundaries of the proposed project, which includes providing a detailed map showing the location;
- A statement of project objectives that consist of the underlying purpose of the project;
- A description of the project’s technical, economic, and environmental characteristics, considering the principal engineering proposals (if any) and supporting public service facilities; and
- Identification of the intended uses of the EIR, including a list of approvals and permits required to implement the project.

The NMMP application includes all the entitlements for the adoption of the Northstar Mountain Master Plan and approval of the project-level components summarized in DEIR Table 3-2, as well as conceptual approval for the program-level components (though additional project-specific approval from the County will be required). It does not include, however, an application for permits or entitlements to proceed with other potential recreation facilities or development at Northstar or adjoining land areas.

Northstar Forest Flyer

The Forest Flyer Conditional Use Permit was approved by the Placer County Planning Commission in 2013 (with the adoption of a mitigated negative declaration) and is currently under appeal before the Board of Supervisors. The Forest Flyer would consist of steel tracks, suspended above the ground on individual towers and footings. The tracks would connect the top and bottom terminal locations, which will be improved with attendant/operator huts and a cart storage building. The individual carts can accommodate single or double riders and would be pulled uphill with a 40 horsepower electric motor on a straight track with a single bend. Upon reaching the upper terminal, the carts would be released to descend on the winding downhill track, with speed controlled by the riders. The Flyer would be operated year-round during daylight hours. The lower station would be located in the vicinity of the Big Springs Day Lodge at mid-mountain and would consist of the attendant hut, cart storage building, and pedestrian access. The tracks would ascend the mountain toward the southwest, terminating at the upper station, just south and uphill of the Village Express Lift top terminal. Guests would access the site from the Village at Northstar by boarding the Big Springs Express Gondola and riding up to the mid-mountain area.

The approved Forest Flyer would provide an additional activity for summer and winter guests who are already visiting or staying at Northstar in a manner similar to the intent of the project- and program-level components in the proposed NMMP. However, the proposed project-level and program-level components of the NMMP do not include any required approvals, infrastructure, or other feature that would support the construction and operation of the Forest Flyer. Both the

proposed NMMP project- and program-level components and the Forest Flyer can be approved, constructed, and operated independent of each other. In addition, the DEIR included the consideration of the cumulative effect of the Forest Flyer in combination with other area and regional development activity in the consideration of cumulative impacts of the proposed NMMP (see DEIR pages 18-1 and -2). Based on the above, the approved Forest Flyer and the proposed NMMP are separate projects and were not improperly segmented from each other, and the combined cumulative environmental effects of both projects were properly addressed in the DEIR consistent with CEQA Guidelines Section 15130.

Martis Valley West Parcel Specific Plan/Martis West Area Plan

The proposed Martis Valley West Parcel Specific Plan/Martis West Area Plan project would involve the shifting of existing residential and commercial allowed development (based on zoning and land use designations under the Martis Valley Community Plan) from east of State Route 267 to 775 acres west of SR 267 near Brockway Summit. The extent of allowed development under the Martis Valley Community Plan would be reduced from 1,360 dwelling units and 6.6 acres of commercial uses to 760 residential units and 6.6 acres of commercial. This project involves East-West Partners and Sierra Pacific Industries and is located on lands outside the ownership and management of the NMMP project.

While the proposed Martis Valley West Parcel Specific Plan/Martis West Area Plan project is located adjacent to the easternmost program-level components of the NMMP (near Sawmill Flat Lake), the Martis Valley West Parcel Specific Plan/Martis West Area Plan project is not associated with Northstar and would not meet the project objectives or intent of the NMMP. The proposed project-level and program-level components of the NMMP do not include any required approvals, infrastructure, or other feature that would support the construction and operation of the Martis Valley West Parcel Specific Plan/Martis West Area Plan. Both the proposed NMMP project- and program-level components and the Martis Valley West Parcel Specific Plan/Martis West Area Plan can be approved, constructed, and operated independent of each other. As noted in Master Response 2, the cumulative traffic impacts of the extent of development proposed in the Martis Valley West Parcel Specific Plan/Martis West Area Plan were considered in the DEIR.

Master Response 5 – Timberland Production Zone Text Amendment and Forest Resource Impacts

Several comment letters (3, 34, 44, BB, and GG) express concerns that the proposed NMMP Zoning Text Amendment for Timberland Production Zones (TPZ) would only apply to Northstar and constitutes preferential spot zoning. In addition, comment letters state that the DEIR fails to adequately address the impacts to forest resources from NMMP components as well as future uses that could be allowed under the proposed Zoning Text Amendment.

DEIR pages 3-45 and -46 provide a detailed description of the proposed Zoning Text Amendment to TPZ. The intent of the Zoning Text Amendment was not to be limited to Northstar. Based on further review of the Zoning Text Amendment, the following revisions are made that would allow other existing ski resorts outside of the Lake Tahoe Basin that own or would eventually own TPZ lands the ability to submit for a conditional use permit for the development of ski lift facilities or ski runs as potential expansions of existing resorts. New ski resorts and associated commercial support facilities would not be an allowed use in the TPZ. As shown in DEIR Figure 3-13, Royal Gorge, Sugar Bowl, and Alpine Meadows ski resorts could potentially acquire adjacent TPZ lands and expand ski operations. However, there are no applications before the County for these resorts to expand and consideration of potential expansions of other resorts is speculative at this

time. In addition, any proposal for a future expansion of an existing resort onto TPZ land would require separate and independent analysis, environmental review and entitlement.

Section 17.04.030 (Definitions) of the Placer County Code:

“Ski lift facilities” and “ski runs” (land use) mean the use of ski lifts, ski runs, and trails. Ski lift facilities include powered conveyors for transporting skiers or sightseers up a mountainside, with terminals at each end and supporting towers along the route. Ski lifts can be chair lifts, surface lifts, gondolas, or cable cars. Ski runs include slopes intended for downhill skiing, and paths or trails for cross-country or Nordic skiing, and helicopter skiing runs. Ski facilities also include snow-making, helicopter skiing facilities, and related commercial facilities such as equipment rental and storage lockers, warming huts, restaurants and bars, and overnight lodging accommodations.

Within the TPZ, “ski lift facilities” and “ski runs” (land use) mean the use of ski lifts, ski runs, and trails within land boundaries, that, as of March 15, 2012, were are owned and/or operated by existing ski resorts and which are not located within the Lake Tahoe Basin boundary. Ski lift facilities include powered conveyors for transporting skiers or sightseers up a mountainside, with terminals at each end and supporting towers along the route. Ski lifts can be chair lifts, surface lifts, gondolas, or cable cars. Ski runs include slopes intended for downhill skiing, and paths or trails for cross-country or Nordic skiing. Ski facilities also include snow-making and related noncommercial support facilities.

The DEIR discloses the physical environmental effects of the development’s recreational facilities throughout the Northstar Mountain Master Plan area, including TPZ lands (see DEIR Sections 4.0 through 18.0). The DEIR specifically acknowledges improvements that would occur within the TPZ designated lands and evaluates the consistency of NMMP project- and program-level components on TPZ and associated loss of timber resources (see DEIR 4-11 through -13). The TPZ lands within Northstar located in Northstar Habitat Management Plan (HMP) Management Zones D and E that are planned to be managed to retain, improve, and enlarge these forested areas would improve this TPZ area from existing conditions (DEIR Appendix 3.3, Tables 4-6 and 4-7). The HMP identifies that the forests in Zone C (which includes a TPZ zoned area adjacent to State Route 267) are to be managed for the protection of human safety and forest health, and to maintain and enhance natural resources to the extent practicable (without compromising human safety or forest health). Management practices conform to all applicable California Forest Practice Rules and to the specific terms and conditions of Timber Harvest Plans for timber operations in this zone. These Timber Harvest Plans contain numerous measures to sustain forest productivity and to avoid and/or minimize adverse effects on habitats, including measures that address harvesting practices and erosion control, watercourse protection, and wildlife protection. Ski resort operation would not conflict with timber harvesting operations that may occur at Northstar, since timber harvesting would occur outside of the winter season. The California Department of Forestry and Fire Protection (Cal Fire) has reviewed the proposed Zoning Text Amendment and associated analysis in the DEIR, and Cal Fire has no objection to the proposed Zoning Text Amendment to allow ski lift/run development as a conditional compatible use for TPZ lands in Northstar. Cal Fire’s position on this matter is primarily based on the Draft EIR’s clear and appropriate articulation of the requirements for Timber Conversion and Timber Harvest permitting through Cal Fire as a component of any ski lift/run development on timberland (Huff 2014).

No substantial loss of timberland or future timber operations is expected. In addition, implementation of the Northstar HMP and mitigation measure 6-9 would provide forest preservation and enhancement measures that are above and beyond traditional resource

management protocol that commonly occurs in TPZ land. Also, the NMMP would be limited to the recreational uses and locations described within the NMMP.

The proposed zoning text amendment would not entitle any future development of any additional ski improvements or recreation facilities within TPZ areas within Northstar or areas potentially added to other existing ski resorts (Royal Gorge, Sugar Bowl, Squaw Valley and Alpine Meadows). Any additional future proposed ski improvements within TPZ land areas in the County would require approval of a Conditional Use Permit and environmental review under CEQA. It would be speculative to foresee additional future ski improvements beyond the NMMP as a result of the zoning text amendment that could be evaluated for physical environmental impacts.

1.5 RECIRCULATION

CEQA requires recirculation of an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review, but before certification (Section 15088.5). New information is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (Section 15088.5).

Because this Final EIR did not result in the identification of any new significant environmental impacts or a substantial increase in the severity of an environmental impact, this Final EIR does not contain “significant new information,” and recirculation of the Draft EIR is not required prior to approval.

REFERENCES

- Fehr & Peers Associates. 2005. Dyer Mountain Resort Draft EIR Appendix G1, Traffic Impact Analysis.
- Hall, Jerusha. 2014a. Northstar California Resort. E-mail correspondence dated regarding snowmaking data for Northstar. March 10.
- . 2014b. Northstar California Resort. E-mail correspondence dated regarding parking conditions and peak traffic conditions. March 5.
- Hawley, Sara. 2014a. LSC Traffic Consultants. E-mail correspondence dated regarding parking conditions and peak traffic conditions. March 21.
- . 2014b. LSC Traffic Consultants. E-mail correspondence dated regarding parking count data for Northstar. February 11.
- Huff, Eric. 2014. California Department of Forestry and Fire Protection. E-mail correspondence regarding proposed Zoning Text Amendment impacts on TPZ. February 25.
- ITE (Institute of Transportation Engineers). 2012. *Trip Generation Manual*, 9th ed.
- LSC Traffic Consultants. 2001. *Northstar-at-Tahoe 2000–2001 Winter Season Traffic Monitoring Program*.
- Placer County. 2011. *Homewood Mountain Resort Ski Area Master Plan Final EIR/EIS*.
- Northstar California. 2014a. Northstar Skier/Car Data.
- . 2014b. 2010–2013 Parking Lot Count Data.