

## 4 ALTERNATIVES

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "... a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines Section 15126.6(d) requires that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project (Site D – Full Project). If an alternative would cause one or more significant effects in addition to those that would be caused by the Project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]). The analysis herein provides a comparative analysis of alternatives to the proposed Project consistent with CCR Section 15126.6(d).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "...shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "... feasibly attain most of the basic objectives of the project ..."), CCR Section 15126.6(f)(1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the Project, the Project's significant effects, and unique Project considerations. Alternatives that fail to meet the fundamental Project purpose need not be addressed in detail in an EIR. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the TCPUD Board of Directors (Board). (See PRC Sections 21081.5, 21081[a] [3].) At the time of action on the Project, the decision-making body may consider evidence beyond that found in this EIR in addressing such determinations. The decision-making body, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an

alternative on that ground provided that the decision-making body adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence.

## 4.1 BASIS FOR SELECTION OF ALTERNATIVES

As summarized above, the State CEQA Guidelines Section 15126.6(c) provides the following guidance in selecting a range of reasonable alternatives for the proposed Project. The range of potential alternatives for the proposed Project considered must include those that could feasibly accomplish most of the basic objectives of the Project included below in Section 4.1.1 and Section 2.4, "Project Objectives," in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail." The range of potential alternatives must also be considered that could avoid or substantially lessen one or more of the significant effects, as summarized in Section 4.1.2 below.

### 4.1.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the Project (CCR Section 15126.6[a]). Chapter 2, "Description of Proposed Project and Alternative Evaluated in Detail," articulates the following Project objectives:

TCPUD and TCCSEA are undertaking the proposed Project for a variety of reasons, many of which are interrelated. TCPUD's Project objectives are to:

- ▶ Expand recreational opportunities through construction of a new lodge at Highlands to improve resident and visitor experience.
- ▶ Construct a new lodge that minimizes effects on the neighborhood.
- ▶ Maintain a concessionaire partnership to operate improved and viable recreation opportunities.
- ▶ Preserve financial accountability and transparency of TCPUD property tax funds, while maximizing the use of private funding for construction of the new lodge.
- ▶ Create inviting community areas and public-use spaces.
- ▶ Support the North Lake Tahoe Tourism Plan by capitalizing infrastructure improvements on public lands and recreational assets.

TCCSEA's Project objectives are to:

- ▶ Address operational deficiencies in the current facility and improve financial viability.
- ▶ Repurpose the historic Schilling residence into a new lodge for community use and recreation activities.
- ▶ Maximize the base elevation of the lodge site.
- ▶ Improve and maintain educational programs and activities offered to adults and youth and create more user-friendly access to the trail system for beginner, disabled, and senior recreationists.

TCPUD and TCCSEA shared Project objectives to:

- ▶ Remedy inadequate parking and improve access to the lodge and trail system.
- ▶ Provide high quality and professionally maintained recreational amenities and facilitate growth and diversity of recreational opportunities by enhancing summer and winter activities.

## 4.1.2 Environmental Impacts of the Tahoe Cross-Country Lodge Replacement and Expansion Project

Impacts associated with implementation of the proposed Project and Alternative A are evaluated in Chapter 3, "Environmental Setting, Environmental Impacts, and Mitigation Measures." The summary table (Table ES-1) provided in the "Executive Summary" chapter presents a detailed summary of the potential environmental impacts of implementation of the proposed Project and Alternative A.

## 4.2 ALTERNATIVES CONSIDERED AND NOT EVALUATED FURTHER

The EIR must also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered by TCPUD but are not evaluated further in this Draft EIR. The following summary provides a brief description of these alternative proposals and the rationale for their dismissal. The general location of these alternatives are identified in Figure 4-1.

- ▶ **Site D – Alternative Driveway.** The Site D – Alternative Driveway alternative would involve construction of the Schilling Lodge at a similar location as the proposed Project, but with a new access driveway connecting to Cedarwood Drive rather than Polaris Road. With this alternative, the new driveway would cross through the Highlands Subdistrict, which is zoned and designated residential. The driveway for this alternative would be longer than the proposed Project driveway and would require a bridge across a seasonal drainage, which is considered a stream environment zone. This alternative would include the same structure, uses, and parking as the proposed Project. The Site D – Alternative Driveway was identified as an alternative in the Notice of Preparation for this EIR, but was rejected from further evaluation because it would result in greater potential adverse environmental effects associated with the seasonal drainage crossing. Additionally, this alternative would not substantially reduce any environmental impacts as compared to the Project, and did not receive any support from commenters during the public scoping process.
- ▶ **Site A – Reduced Project.** The Site A – Reduced Project alternative would involve construction of a new lodge at the site of the Existing Lodge. Like Alternative A, this alternative would include demolition of the Existing Lodge and construction of a new lodge using the repurposed Schilling residence. The building footprint could be similar to that of the proposed Project and Alternative A and would include a basement, but would not include an addition to the building. The size of the building would be approximately 6,229 sq. ft. This alternative could have the same number of parking spaces as the proposed Project and Alternative A. Although this alternative may reduce some environmental effects of the proposed Project (e.g., incrementally smaller increase in traffic), it was rejected from further evaluation because it would not have sufficient space to meet the needs of existing and future operational needs of the Project applicant (e.g., open interior space for a gear rental area) and would not substantially reduce any adverse environmental effects, as compared to the proposed Project. Additionally, due to the distance from the school, the location of this alternative would be less ideal than the proposed Project site for a shared parking agreement with the school for parking during special events. The cost and effort to provide utilities (e.g., power, gas, water, fire line, sewer, telephone, and data) would be similar to Alternative A, which would be greater than at the proposed Project site (Olson-Olson Architects 2017).
- ▶ **Site B – Site at the End of Highlands Drive.** The Site B alternative would be located at the end of Highlands Drive. This alternative would repurpose the historic Schilling residence and construct a lodge up to the size of the lodge for the proposed Project and could have a similar number of parking spaces. This alternative was rejected from further consideration for several reasons, including less direct access to cross-country ski trails compared to alternatives at the proposed Project and Alternative A sites. The location of this lodge would be at the edge of the neighborhood and visitors would have to travel farther into the Highlands Community neighborhood to access the lodge at this location. Additionally, both the proposed Project and Alternative A sites already provide public access for community and recreation purposes; locating the Schilling Lodge in either of these areas would represent less of a change in existing use for nearby neighbors than new disturbance at the end of Highlands Drive. The cost and effort to provide utilities (e.g., power, gas, water, fire line, sewer, telephone, and data) would be greater at this location than at the proposed Project site. (Olson-Olson Architects 2017).



Source: Compiled by Ascent Environmental in 2019

**Figure 4-1 Alternatives Considered and Not Evaluated Further**

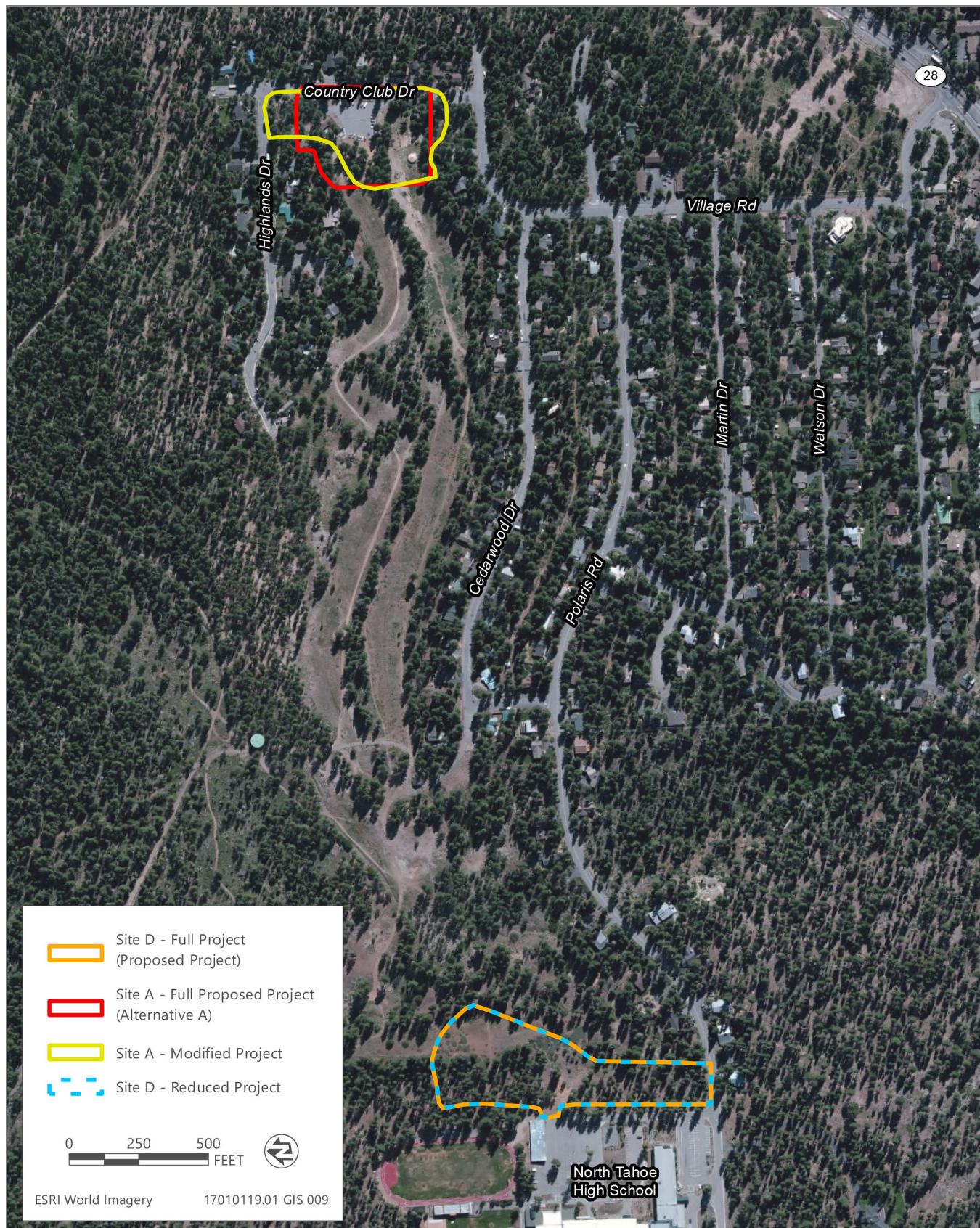
- ▶ **Site C – Site at the End of Cedarwood Drive.** The Site C alternative would be located at the end of Cedarwood Drive. Unlike the Site D – Alternative Driveway alternative, this alternative would not construct a new, long driveway off this street. This alternative would repurpose the historic Schilling residence and construct a lodge up to the size of the lodge for the proposed Project and could have a similar number of parking spaces. This alternative was rejected from further consideration because it would be located within the Highlands Subdistrict, which is zoned and designated residential and the Project would not be consistent with this land use designation. Similar to Site D – Alternative Driveway described above, the location of this alternative would not be supported by the public. Due to the distance from the school, the location of this alternative would be less ideal than the proposed Project for a shared parking agreement with the school for parking during special events.
- ▶ **Site E – Site at the End of Country Club Drive.** The Site E alternative would be located at the end of Country Club Drive. This alternative would repurpose the historic Schilling residence and construct a lodge up to the size of the lodge for the proposed Project and could have a similar number of parking spaces. This alternative was rejected from further consideration for several reasons, including less direct access to cross-country ski trails compared to alternatives at the Existing Lodge and adjacent to the school. Additionally, both the proposed Project and Alternative A sites already experience public access for community and recreation purposes; locating the Schilling Lodge in either of these areas would represent less of a change in existing use for nearby neighbors than new disturbance at the end of Country Club Drive. Due to the distance from the North Tahoe High School, a shared-parking agreement between the Schilling Lodge and the school for large special events would be less convenient than the proposed Project location directly adjacent to the school. This alternative would be located farther from the school, which would be a disadvantage for high school Nordic ski team members accessing the cross-country ski area. The cost and effort to provide utilities (e.g., power, gas, water, fire line, sewer, telephone, and data) would be greater at this location than at the proposed Project site. (Olson-Olson Architects 2017).
- ▶ **Alternative Project Location at the Firestone Property (Site F – Offsite Alternative).** During public scoping, comments were received that suggested locating the Project on the Firestone Property, owned by Placer County, which is located approximately 0.3 mile south of the Existing Lodge and trail network. This location for the Project was also identified by TCPUD early in the planning process as Site F – Offsite Alternative (TCPUD 2018). The Firestone Property is located on the mountain side of State Route (SR) 28 across from Dollar Drive. This alternative was rejected from further evaluation because the Firestone Property is substantially removed from the bulk of the existing ski trail network and does not include terrain suitable for beginners or lessons. Additionally, the property has been developed as a trailhead and includes parking for the Dollar Creek Shared-Use Trail, which further makes this area infeasible for use as a new lodge for the cross-country ski area. The trail was opened to trail users in 2018 (Tahoe Fund 2018).

## 4.3 ALTERNATIVES SELECTED FOR FURTHER EVALUATION

Alternatives to the proposed Project that are analyzed at a comparative level of detail include:

- ▶ No Project Alternative,
- ▶ Site A – Modified Project, and
- ▶ Site D – Reduced Project.

The locations of Site A – Modified Project and Site D – Reduced Project alternatives relative to the proposed Project and Alternative A are shown on Figure 4-2. The No Project Alternative would involve continued use of the Existing Lodge, which is located at the Highlands Community Center. These alternatives are described and analyzed in comparison to the proposed Project. Table 4-1 compares the site development features of each of the alternatives. The proposed Project and Alternative A are evaluated in detail in Chapter 3, "Environmental Setting, Environmental Impacts, and Mitigation Measures." Where construction, operation, physical characteristics, phasing, and other features would remain the same as the proposed Project, the reader is directed to the details in Chapter 2, "Description of Proposed Project and Alternative Evaluated in Detail." The alternatives descriptions herein focus on describing the elements that differ from the proposed Project.



Source: Adapted by Ascent Environmental in 2018

**Figure 4-2 Locations of the Project Alternatives**

**Table 4-1 Site Development Features of Each of the Alternatives**

Item	Proposed Project	Alternative A	No Project Alternative (Existing Conditions)	Site A – Modified Project	Site D – Reduced Project
Lodge <sup>1</sup>	10,154 sq. ft.	10,154 sq. ft.	2,723 sq. ft. <sup>2</sup>	8,661 sq. ft. <sup>3</sup>	6,229 sq. ft.
Parking	100 total parking spaces (59,799 sq. ft.)	100 total parking spaces (49,446 sq. ft.)	51 total spaces (approx. 16,820 sq. ft.)	100 total parking spaces (55,803 sq. ft.)	65 total parking spaces (53,184 sq. ft.)
	4 disabled parking spaces	4 disabled parking spaces	2 disabled parking spaces	4 disabled parking spaces	4 disabled parking spaces
	2 bus parking spaces	2 bus parking spaces	0	2 bus parking spaces	2 bus parking spaces
School Connector	Yes	No	No	No	Yes
Patio	6,808 sq. ft.	6,808 sq. ft.	1,345 sq. ft.	6,808 sq. ft.	6,808 sq. ft.
Kinder Sled Storage	80 sq. ft.	80 sq. ft.	Along building in parking lot	80 sq. ft.	80 sq. ft.
Bike Racks	2	2	0	2	2
Yurt	706 sq. ft.	706 sq. ft.	706 sq. ft.	706 sq. ft.	706 sq. ft.
Trees to be Removed	Total	183 <sup>4</sup>	79 <sup>4</sup>	0	152 <sup>5</sup>
	Trees > 30 inches dbh	15 <sup>4</sup>	7 <sup>4</sup>	0	4 <sup>6</sup>
New Land Coverage <sup>9</sup>	81,593 sq. ft. <sup>7</sup>	67,619 sq. ft. <sup>8</sup>	0	74,487 sq. ft.	73,105 sq. ft.
Site Grading/Excavation	3,728 cu. yd. cut/ 1,785 cu. yd. fill	3,446 cu. yd./ 1,723 cu. yd. fill	NA	2,950 cu. yd./ 1,425 cu. yd. fill	3,360 cu. yd./ 1,082 cu. yd. fill

Notes: cu. yd. = cubic yard; sq. ft. = square feet; dbh = diameter at breast height; NA = not applicable

<sup>1</sup> The size of the lodge provided here includes the basement space, where proposed. For Site A – Modified Project, the size of the lodge includes the total size of the Schilling residence and the Existing Lodge as renovated.

<sup>2</sup> The Existing Lodge building combined with the areas containing the extra storage buildings and wax area, but not including the yurt, encompass 3,621 sq. ft.

<sup>3</sup> This includes the size of the Schilling Lodge combined with the size of the Existing Lodge.

<sup>4</sup> Estimate obtained from tree survey data provided by TTCSEA in 2020.

<sup>5</sup> Estimate for Site A – Modified Project provided by TTCSEA in 2019. No such estimate was provided for Site D – Reduced Project. However, because the Site D – Reduced alternative has a smaller footprint, the number of total trees to be removed will be less than for the proposed Project.

<sup>6</sup> Estimate derived by Ascent Environmental in 2020 based on a review of tree survey data provided by TTCSEA.

<sup>7</sup> The Project components contributing to land coverage for the proposed Project are detailed in Table 3.9-4 in Section 3.9, "Geology, Soils, Land Capability, and Coverage."

<sup>8</sup> The Project components contributing to land coverage for Alternative A are detailed in Table 3.9-5 in Section 3.9, "Geology, Soils, Land Capability, and Coverage."

<sup>9</sup> The land coverage estimates are conservative and higher than the coverage that would actually occur with development of each alternative because it does not account for installation of best management practices that could remove existing coverage.

Source: Compiled by Ascent Environmental in 2020

With regard to the no project alternative, the State CEQA Guidelines provide specific requirements. CCR Section 15126.6(e) (1) requires that the no project alternative be described and analyzed "to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project." The no project analysis is required to discuss "the existing conditions at the time the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current

plans and consistent with available infrastructure and community services" (Section 15126.6[e][2]). "If the project is... a development project on identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (Section 15126[e][3][B].)

## 4.4 NO PROJECT ALTERNATIVE

Under the No Project Alternative, the Tahoe Cross-Country Lodge would continue to function in its current building capacity within the Highlands Community Center (i.e., the Existing Lodge), and serve as a winter cross-country lodge and trail network as well as a summer trailhead and year round space for other community functions and activities. During the spring, summer, and fall, bicycle rentals could continue to be offered. As under existing conditions, TCPUD could implement improvements or maintenance activities for the Existing Lodge building and address the parking deficiencies at the existing site. Such improvements or maintenance would be required to address issues with the aging facility and improving onsite parking capacity to reduce spillover onto residential streets. As part of the improvements and maintenance, the No Project Alternative could involve remodeling the interior, making changes to the façade, addressing circulation, and restriping parking. With this alternative, there would not be any anticipated increase in special events.

### 4.4.1 Biological Resources

The No Project Alternative would not include the development of a new lodge and associated improvements or any Project-related changes in recreation uses or patterns. Because no construction-related ground disturbance or operation of a new lodge facility would occur, no impacts to any common or sensitive biological resources would occur with the No Project Alternative. Similarly, tree removal would not occur with the No Project Alternative. In comparison, the proposed Project would remove native trees (including trees measuring greater than 30 inches diameter at breast height [dbh]) and other vegetation, and could potentially cause disturbance or loss of special-status plants if they are present on the proposed Project site, establishment or spread of invasive plants, and disturbances to wildlife movement. (*No Impact*)

### 4.4.2 Archaeological, Historical, and Tribal Cultural Resources

The proposed Project would include the relocation of the historic Shilling residence and because preservation measures required by SHPO would be a condition of the TRPA permit, relocation of the Schilling residence would occur without adversely affecting its historic status and the impact would be less than significant. Under the No Project Alternative, the Schilling residence could be reconstructed as part of a different project subject to its own environmental review and permitting. Because there would be no ground-disturbing activities or changes to existing conditions of the proposed Project site or Existing Lodge site under the No Project Alternative, there would be no potential impacts on cultural resources. (*No Impact*)

### 4.4.3 Transportation

Under the No Project Alternative, the Existing Lodge would remain unchanged and continue to operate consistent with existing conditions. Considering that there would be no changes at the proposed Project site, there would be no change in proposed Project site-generated or Existing Lodge site-generated traffic volumes. Consequently, there would be no change in intersection level of service (LOS), and all study intersections would continue to operate at an acceptable LOS. Additionally, there would be no change in daily vehicle miles traveled (VMT) associated with the No

Project Alternative. Because the No Project Alternative would not change traffic volumes on residential roadways, the roadways that serve the Project site would continue to meet Placer County's roadway capacity standards.

Because proposed Project site and the Existing Lodge site access would remain unchanged with the No Project Alternative, no driver sight distance deficiencies or other traffic hazard would occur. No changes in existing parking facilities and operations would occur. Existing on-street parking on Country Club Drive would continue pursuant to the existing agreement with Placer County. (*No Impact*)

#### **4.4.4 Air Quality**

The No Project Alternative would not include any new development or expansion of existing facilities, and thus, would not generate new construction or operation-related air emissions. By comparison, development of the proposed Project would generate construction-related and operational emissions associated with vehicle trips and activities within the proposed Project site or Existing Lodge site. Because there would be no physical changes to the Existing Lodge site that could affect air quality under the No Project Alternative, there would be no air quality impacts. (*No Impact*)

#### **4.4.5 Greenhouse Gas Emissions and Climate Change**

No construction would occur under the No Project Alternative, and no new vehicle trips would be generated on a daily basis. Further, no increase in electricity or natural gas consumption would occur. Therefore, there would be no increase in GHG emissions; thus, this alternative would be under the identified threshold of significance. To that end, it is important to view the Project in terms of GHG efficiency relative to what may occur without the proposed Project construction. The proposed Project has a relatively small carbon footprint due to its size. Nonetheless, in and of itself, emissions under this alternative would be less than those of the proposed Project. (*No Impact*)

#### **4.4.6 Noise**

Under the No Project Alternative, the Existing Lodge would continue to function in its current building capacity and operations would continue as a cross-country ski facility in the winter. During the spring, summer, and fall, the facility could continue to offer bicycle rentals and provide parking for a trailhead. No construction increases in special events, or associated increases in traffic would occur, and there would be no new noise impacts. (*No Impact*)

#### **4.4.7 Geology, Soils, Land Capability, and Coverage**

The No Project Alternative would not include the construction of a new lodge or result in increased impervious surfaces. No construction related ground disturbance would occur, so the risk of increased erosion would remain low. No new facilities would be constructed so there would be no change in the risk from strong seismic shaking. Because there would be no construction, no change in impervious cover, and no development of new facilities, there would be no new soils or geologic impacts. (*No Impact*)

#### **4.4.8 Hydrology and Water Quality**

The No Project Alternative would not include the construction of a new lodge or result in increased impervious surfaces. No construction-related ground disturbance would occur, so the risk of sediment laden runoff would remain low. The Highlands Community Center would continue to serve its current function and the ongoing operation and use of the facility would continue to generate urban contaminants that would be directed to existing stormwater management systems with an unknown degree of effectiveness. Because there would be no construction, no change in impervious cover, and no change in the level of use at the existing facility, there would be no new hydrologic impacts. (*No Impact*)

## 4.4.9 Utilities

With implementation of the No Project Alternative, operations at the Existing Lodge would not change and, thus, would result in no changes to the existing demand on utilities, including water supply, wastewater, electricity, natural gas, and solid waste. Because there would be no changes to the use or existing conditions of the proposed Project site or at the Existing Lodge site under the No Project Alternative, there would be no potential impacts on utilities compared to the proposed Project. (*No Impact*)

## 4.4.10 Energy

No construction would occur under the No Project Alternative, and no new vehicle trips would be generated on a daily basis. Further, no increase in electricity or natural gas consumption would occur. Therefore, there would be no increase in energy demand as compared to existing conditions and the proposed Project. Energy is currently being consumed on the No Project Alternative site by the Existing Lodge. With the proposed Project, the reconstructed portion of the Schilling residence would be built to energy efficiency standards of the 2019 California Energy Code, which would improve upon the energy efficiency of the Existing Lodge; however, overall energy consumption would be expected to be greater with implementation of the proposed Project as compared to the No Project Alternative because capacity and vehicle trips would be expanded. Energy consumption at the No Project Alternative site would be less under this alternative compared to that of the proposed Project. (*Less Impact*)

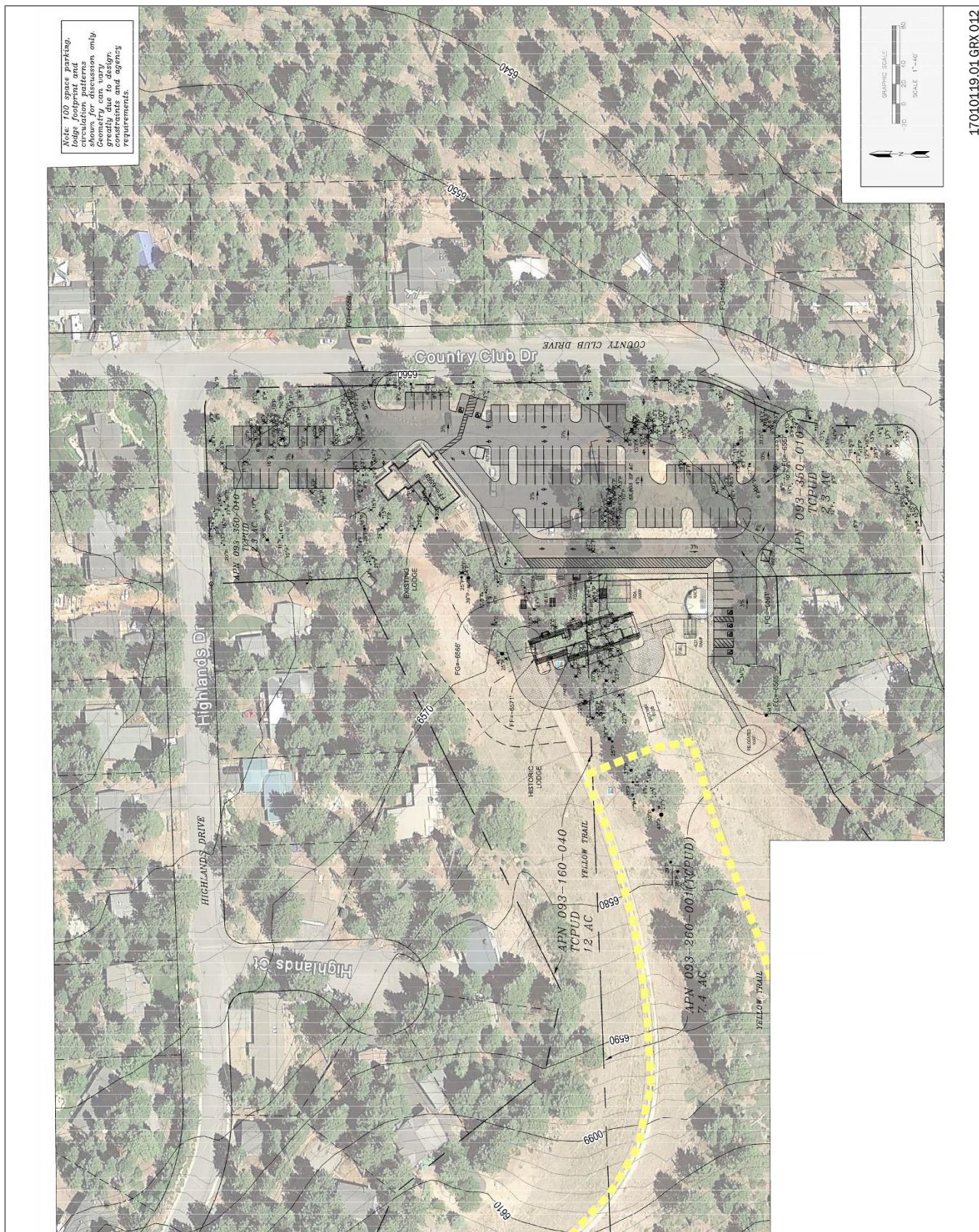
## 4.5 SITE A - MODIFIED PROJECT

The Site A – Modified Project alternative would be in the same location as Alternative A but would include a different site configuration with two buildings—the Schilling residence with a basement addition (totaling 6,229 sq. ft.) and renovation of the Existing Lodge building (2,432 sq. ft.; see Table 4-1 and Figure 4-3). The total building area would be about 1,500 sq. ft. smaller than the proposed Project and Alternative A. Uses of the lodge would be similar to the proposed Project and would include ticket sales, retail, meeting room, café, rental, storage, and community/outdoor space. This alternative would also include the same access and number of bus and vehicle parking spaces as Alternative A on Country Club Drive; however, due to its configuration, it would involve a slightly larger footprint for the parking lot and driveway area. Overall, this alternative would result in less new coverage than for the proposed Project. The number of special events (e.g., large special events, community events, private events) at the lodge and number of attendees at these events (see Table 2-3 in Chapter 2) would be similar to, but would not exceed, those of the proposed Project. The Site A – Modified Project does not propose a land exchange with the Conservancy.

### 4.5.1 Biological Resources

Development and operation of the Schilling Lodge and associated facilities would remove native trees and other vegetation, and could potentially cause disturbance or loss of special-status plants or wildlife if they are present on the Site A – Modified Project alternative site, establishment or spread of invasive plants, and disturbances to wildlife movement. Comparative summaries for these potential impacts between the Site A – Modified Project alternative and the proposed Project are provided below. With the Site A – Modified Project alternative, the area of new physical disturbances would be slightly smaller than with the proposed Project due to the reuse of an existing developed site.

With implementation of the Site A – Modified Project alternative, construction would require the removal of an estimated 152 total trees. Given that the location of this alternative is similar to that of Alternative A, the Site A – Modified Project alternative would result in a similar impact related to the removal of trees measuring 30 inches diameter at breast height (dbh) or greater as described for Alternative A in Section 3.3, "Biological Resources." This alternative would also be required to implement the same mitigation measure as that of Alternative A that involves minimizing tree removal and developing a limited forest plan and/or harvest plan for tree removal to avoid conflicting with TRPA's Code. The potential biological effects and TRPA review and permitting requirements related to



Source: Image provided by Tieslau Civil Engineering, Inc. in 2018

**Figure 4-3      Site A – Modified Project Site Plan**

tree removal, and the Project applicant's compliance with those requirements and applicable policies, would be similar to those described for the proposed Project. However, construction of the Site A – Modified Project alternative would require the removal of an estimated 31 fewer trees, including potentially 11 fewer trees measuring greater than 30 inches dbh, than with the proposed Project.

The potential for special-status plants, special-status wildlife, invasive plants, and wildlife movement corridors to occur on the Site A – Modified Project alternative site are similar to those described for the proposed Project site, although Site A contains slightly less natural vegetation and potential habitat. The potential construction-related and operational effects related to special-status species, invasive species, and wildlife movement corridors with the Site A – Modified Project alternative would be similar to those described for the proposed Project, because construction and ground disturbance required for this alternative would be located in the same general vicinity and would include the same impact mechanisms and construction effects as the proposed Project. Similar to the proposed Project, Mitigation Measures 3.3-1 and 3.3-3 would be implemented to reduce potential effects related to special-status plants and invasive plants to less-than-significant levels. However, the potential for and magnitude of these impacts may be less than those for the proposed Project. The Site A – Modified Project alternative would require less ground disturbance and native vegetation removal, possibly resulting in a lower risk or magnitude of invasive plant introduction and spread, potential disturbance to special-status plants, and disturbance to mule deer and other wildlife movements.

Additionally, as analyzed and discussed for Alternative A, the edge of a TRPA osprey disturbance zone intersects just inside the northeast-corner boundary of the Site A – Modified Project alternative site along Country Club Drive; the proposed Project site does not overlap with any of this osprey disturbance zone. For the same reasons described for Alternative A, operational activities associated with the Site A – Modified Project alternative would not substantially change potential habitat conditions for osprey, further degrade habitat conditions within the TRPA osprey disturbance zone measurably relative to existing habitat quality, or disturb future nesting activity at the nest site located approximately 0.25 mile away measurably above existing disturbance levels. (*Similar to Slightly Less Impact*)

## 4.5.2 Archaeological, Historical, and Tribal Cultural Resources

The Site A – Modified Project Alternative would include the relocation of the historic Schilling Residence to the site of the Existing Lodge, similar to Alternative A. Earth-moving activities within the Site A – Modified Project Alternative site have the potential to disturb archaeological resources, TCRs, or result in discovery of human remains. Under the Site A – Modified Project alternative, there would be ground-disturbing activities (e.g., grading, excavation) that could result in the discovery of archaeological resources, TCRs, or human remains; however, compliance with the California HSC Sections 7050.5 and 7052, PRC Section 5097, and feasible mitigation measures would reduce these impacts to a less-than-significant level. Because the alternative would have a slightly smaller footprint than the proposed Project, impacts on cultural resources would be incrementally less. (*Similar to Slightly Less Impact*)

## 4.5.3 Transportation

The Site A – Modified Project alternative would result in a different configuration of the lodge at Site A than Alternative A. It is anticipated that the lodge operations and site-generated traffic volumes associated with the Site A – Modified Project alternative would be the same as Alternative A, and similar to the proposed Project.

Consequently, the effect on intersection LOS would be the same as Alternative A, and similar to the proposed Project, and all study intersections would continue to operate at an acceptable LOS. Residential roadways that serve the Site A – Modified Project alternative site would continue to meet Placer County's roadway capacity standards.

The Site A – Modified Project alternative includes the same number of lodge parking spaces (100 spaces) as both Alternative A and the proposed Project. Therefore, parking impacts would be the same as the proposed Project.

As with the proposed Project, the Site A – Modified Project alternative site plan and associated engineering and design plans would be subject to the Placer County design review and plan check processes; and thus, would be

required to demonstrate compliance with all applicable Placer County design and safety standards for roadway improvements or changes to existing Placer County roadways for this alternative.

Because the Site A – Modified Project alternative would be in the same location as Alternative A and would result in similar operations and traffic volumes as Alternative A, this alternative would similarly result in an increase in daily VMT. The Site A – Modified Project alternative would be required to implement the same mitigation measures as described for the proposed Project and Alternative A in Section 3.5, "Transportation," to prepare and implement a Transportation Demand Management (TDM) plan to reduce project-generated daily VMT to the maximum degree feasible and fully mitigate GHG emissions. The VMT impacts of this alternative would be slightly less than those of the proposed Project.

For the reasons described above, the transportation impacts of the Site A – Modified Project alternative would be similar to those of the proposed Project. (*Similar to Slightly Less Impact*)

#### 4.5.4 Air Quality

The Site A – Modified Project alternative would include a reconfiguration of buildings at the site of the Existing Lodge compared to Alternative A. This configuration would have less coverage and an incrementally smaller building area compared to the proposed Project but would have an incrementally greater building footprint (including the existing Highlands Community Center); however, this alternative would include the same uses and number of bus and vehicle parking spaces as the proposed Project. Construction-generated emissions of air pollutants under this alternative would be incrementally less because the Schilling Lodge and other site improvements (e.g., parking lot) would be slightly smaller than the proposed Project. Operational emissions would be similar to the proposed Project and also would not exceed significance criteria recommended by PCAPCD. Because of the decreased square footage of the Site A – Modified Project alternative, construction emissions would be incrementally less than the proposed Project. (*Similar to Slightly Less Impact*)

#### 4.5.5 Greenhouse Gas Emissions and Climate Change

The Site A – Modified Project alternative would include a reconfiguration of the Existing Lodge (i.e., Highlands Community Center) as compared to Alternative A. This configuration would have an incrementally smaller footprint compared to the proposed Project; however, this alternative would include the same access, uses, and number of bus and vehicle parking spaces as the proposed Project. Because this alternative would have an incrementally smaller footprint for the buildings, parking, and driveway than the proposed Project and would not include demolition of the Existing Lodge building, the construction emissions could be less than those of the proposed Project. Operational emissions would be similar to the proposed Project. The emissions from this alternative would be mitigated to zero consistent with the Placer County Tahoe Basin Area Plan Mitigation Measure 12-1. (*Similar to Slightly Less Impact*)

#### 4.5.6 Noise

The Site A – Modified Project alternative would construct a building similar to the proposed Project, and therefore, would require similar construction activities and equipment. Construction noise and vibration levels would be similar to those described for the proposed Project. The levels may be incrementally less under the Site A – Modified Project alternative compared to the proposed Project because of the incrementally smaller site for Site A – Modified Project alternative. Regarding operations, the number of special events would be similar to those described for the proposed Project, and therefore, operational (i.e., event, traffic) noise would be the same as described for the proposed Project. All noise impacts would be similar to those described for the proposed Project. (*Similar to Slightly Less Impact*)

## 4.5.7 Geology, Soils, Land Capability, and Coverage

Earth-moving activities associated with construction have the potential to affect geology, soils, and land coverage. The types of impacts that would occur from development of the Site A – Modified Project include: increased TRPA regulated land coverage, increased erosion because of ground disturbance and soil compaction, and exposing buildings and people to seismic hazards. Existing regulations and permitting requirements, such as California Building Code (CBC) requirements, National Pollutant Discharge Elimination System (NPDES) permit conditions, and best management practices (BMPs), would reduce potential impacts to a less-than-significant level. The area of impact would be slightly smaller than the proposed Project due to the reuse of an existing developed site and the smaller footprint of the parking area and driveway. Therefore, the Site A – Modified Project impacts on geology, soils, land capability, and coverage would be similar to but somewhat less than the proposed Project. (*Similar to Slightly Less Impact*)

## 4.5.8 Hydrology and Water Quality

Construction, earth-moving activities, and new development associated with the Site A – Modified Project alternative have the potential to affect hydrology and water quality. The types of impacts that could occur from development of this alternative include: adverse effects on the surface and ground water quality, increased stormwater runoff, and alterations to existing drainage systems. Existing TRPA, Lahontan RWQCB, and Placer County regulations and permitting requirements, such as NPDES permit conditions, stormwater pollution prevention plan (SWPPP), and temporary and permanent water quality BMPs would reduce potentially significant impacts to a less-than-significant level. The area of impact would be slightly smaller than the proposed Project, due to the reuse of an existing developed site and the reduced size of the parking area. Therefore, the Site A – Modified Project alternative's impact on hydrology and water quality would be similar but somewhat less than the proposed Project. (*Similar to Slightly Less Impact*)

## 4.5.9 Utilities

The size of the lodge building associated with the Site A – Modified Project alternative would be smaller than the lodge proposed by the proposed Project; thus, the water, wastewater, energy, and solid waste demands would be incrementally less than those of the proposed Project. Water supply, wastewater conveyance and treatment capacity, electricity and natural gas supplies, and capacity of solid waste collection facilities are sufficient to meet the demands associated with this alternative; however, like Alternative A, water supply infrastructure improvements could be needed to meet fire flow requirements for the lodge at this location. This alternative would also be required to implement Mitigation Measure 3.11-1 to reduce the potential impact related to water supply facilities to a less-than-significant level. Overall, it is reasonable to assume that potential impacts of the Site A – Modified Project alternative would be slightly greater than those of the proposed Project. (*Greater Impact*)

## 4.5.10 Energy

The Site A – Modified Project alternative would include a reconfiguration of buildings and site plan as compared to the proposed Project. The configuration of this alternative would have an incrementally smaller footprint compared to the proposed Project; however, this alternative would include the same amount of access, uses, and number of bus and vehicle parking spaces as the proposed Project. Construction-related energy consumption be short-term and would be incrementally less than the proposed Project. Operational energy consumption would be similar to the proposed Project. As part of the Site A – Modified Project alternative, the Existing Lodge building would be renovated, which could include some energy efficiency improvements. Because this alternative would include a smaller new lodge building compared to the proposed Project and would retain the Existing Lodge building with the possibility for energy efficiency improvements the operational energy consumption would be similar to incrementally less than energy use by the proposed Project. (*Similar to Slightly Less Impact*)

## 4.6 SITE D - REDUCED PROJECT

The Site D – Reduced Project alternative would occupy the same footprint as the proposed Project (Site D – Full Project), but there would be no addition to the Schilling Residence other than a basement. The total building area would be 6,229 sq. ft (see Table 4-1 and Figure 4-4). Uses of the lodge would be similar to the proposed Project and would include ticket sales, retail, meeting room, café, rental, storage, and community/outdoor space. The Existing Lodge would be retained. This alternative includes 65 vehicle parking and two bus parking spaces in a 53,184 sq. ft. driveway and parking area. Access to the site would be provided by the same new driveway from Polaris Road as the proposed Project. The number of special events (e.g., large special events, community events, private events) and number of attendees at these events at the lodge (see Table 2-3 in Chapter 2) would be similar to, but would not exceed, those of the proposed Project. This alternative would also provide a shared-parking opportunity with the high school and middle school consistent with Policy T-P-13 of the Area Plan. A connection between the school property and the Site D – Reduced Project alternative site would be constructed.

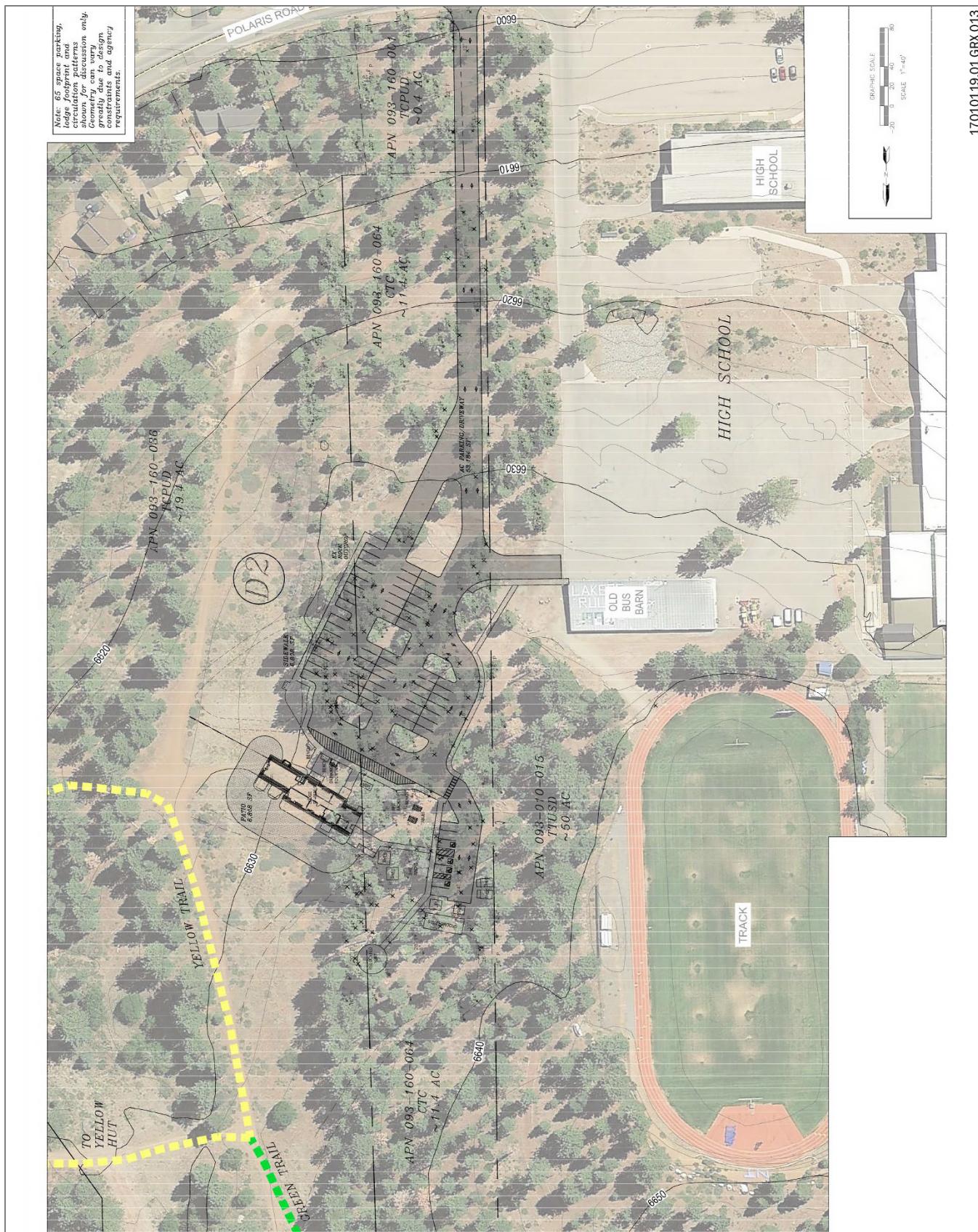
The Site D – Reduced Project alternative would also include a land exchange with the California Tahoe Conservancy (Conservancy) or would require some other form of property rights approval from the Conservancy. The properties that would be proposed for the exchange are described under the “TCPUD-Conservancy Land Exchange,” section in Section 2.5.1, “Project Characteristics,” and are shown on Figures 2-5 through 2-7 in Chapter 2, “Description of the Proposed Project and Alternative Evaluated in Detail.”

Implementation of Site D – Reduced Project would retain the Existing Lodge (i.e., Highlands Community Center). As described in the “Highlands Community Center” section under Section 2.6.1, “Proposed Project (Site D – Full Project),” it would be managed and maintained by TCPUD, would continue to be used for community-related activities, and could be rehabilitated or upgraded if determined necessary by TCPUD.

### 4.6.1 Biological Resources

Development and operation of the Schilling lodge and associated improvements would remove native trees and other vegetation, and could potentially cause disturbance or loss of special-status plants or wildlife if they are present on the Site D – Reduced Project alternative site, establishment or spread of invasive plants, and disturbances to wildlife movement. Comparative summaries for these potential impacts between the Site D – Reduced Project alternative and the proposed Project are provided below. With the Site D – Reduced Project alternative, the area of new physical disturbances would be slightly smaller than with the proposed Project due to the smaller footprint of the lodge building/facilities and parking area.

With implementation of the Site D – Reduced Project alternative, construction would require the removal of an amount of trees less than the 183 required for the proposed Project. Given the location of this alternative is the same but with a smaller footprint than that of the proposed Project, the total number of trees will be less. However, the Site D – Reduced Project alternative would result in a similar impact related to the removal of trees measuring 30 inches dbh or greater as described for the proposed Project in Section 3.3, “Biological Resources.” This alternative would also be required to implement the same mitigation measure as that described for the proposed Project that involves minimizing tree removal and developing a limited forest plan and/or harvest plan for tree removal to avoid conflicting with TRPA’s Code. The potential biological effects and TRPA review and permitting requirements related to tree removal, and the applicant’s compliance with those requirements and applicable policies, would be similar to those described for the proposed Project. However, construction of the Site D – Reduced Project alternative would require the removal of fewer total trees, including six fewer trees measuring greater than 30 inches dbh, than the proposed Project.



Source: Image provided by Tieslau Civil Engineering, Inc. in 2018

**Figure 4-4 Site D – Reduced Project Site Plan**

The potential for special-status plants, special-status wildlife, invasive plants, and wildlife movement corridors to occur on the Site D – Reduced Project alternative site are similar to those described for the proposed Project site. The potential construction-related and operational effects related to special-status species, invasive species, and wildlife movement corridors with the Site D – Reduced Project alternative would be similar to those described for the proposed Project, because construction and ground disturbance required for this alternative would be located generally on the same site and would include the same impact mechanisms and construction effects as the proposed Project. Similar to the proposed Project, Mitigation Measures 3.3-1 and 3.3-3 would be implemented to reduce potential effects related to special-status plants and invasive plants to less-than-significant levels. However, the potential for and magnitude of these impacts may be less than those for the proposed Project. The Site D – Reduced Project alternative would require less ground disturbance and native vegetation removal, possibly resulting in a lower risk or magnitude of invasive plant introduction and spread, potential disturbance to special-status plants, and disturbance to mule deer and other wildlife movements. (*Similar to Slightly Less Impact*)

## 4.6.2 Archaeological, Historical, and Tribal Cultural Resources

The Site D – Reduced Project alternative would include the relocation of the historic Schilling Residence, similar to the proposed Project. Earth-moving activities within the Site D – Reduced Project alternative site have the potential to disturb archaeological resources, TCRs, or result in discovery of human remains. Under the proposed Project and the Site D – Reduced Project alternative, there would be ground-disturbing activities (e.g., grading, excavation) that could result in discovery of archaeological resources or human remains; however, compliance with the California HSC Sections 7050.5 and 7052, PRC Section 5097, and feasible mitigation measures would reduce these impacts to a less-than-significant level. Because the area of impact would be slightly less than under the proposed Project, impacts to cultural resources would be incrementally less. (*Similar to Slightly Less Impact*)

## 4.6.3 Transportation

Lodge operations and site-generated traffic volumes associated with the Site D – Reduced Project alternative would be similar to or slightly less than the proposed Project. Consequently, the effect on intersection LOS would be similar to the proposed Project, and all study intersections would continue to operate at an acceptable LOS. Residential roadways that serve the Site D – Reduced Project alternative site would continue to meet Placer County's roadway capacity standards.

The Site D – Reduced Project alternative includes fewer lodge parking spaces (65 spaces) than the proposed Project (100 spaces). While the overall parking impacts of Site D – Reduced Project alternative would be similar to the proposed Project—with parking largely being able to be accommodated on site—the potential for parking to spillover onto adjacent residential roadways or the adjacent high school and middle school on peak days would be incrementally greater than with the proposed Project.

The access driveway associated with the Site D – Reduced Project alternative is the same as the proposed Project. Therefore, the Site D – Reduced Project alternative site plan and associated engineering and design plans would be subject to the Placer County design review and plan check processes as the proposed Project; and thus, would be required to demonstrate compliance with all applicable Placer County design and safety standards for roadway improvements or changes to existing Placer County roadways for this alternative.

Because the Site D – Reduced Project alternative would be in the same location as the proposed Project and would result in similar operations and traffic volumes as the proposed Project, this alternative would similarly result in an increase in daily VMT. The Site D – Reduced Project alternative would be required to implement the same mitigation measures as described for the proposed Project in Section 3.5, "Transportation," to prepare and implement a TDM plan to reduce project-generated daily VMT to the maximum degree feasible and fully mitigate GHG emissions.

For these reasons, the transportation impacts of the Site D – Reduced Project alternative would be similar to those of the proposed Project. (*Similar to Slightly Less Impact*)

## 4.6.4 Air Quality

The Site D – Reduced Project alternative would not include an addition to the Schilling Residence other than a basement. The total square footage of the alternative would be less than the proposed Project, and the Site D – Reduced Project alternative would offer fewer parking spaces, which could result in spillover parking. Because the square footage would be less, the level of construction-generated emissions would be less. For these reasons, emissions of air pollutants under the Site D – Reduced Project alternative would generate less emissions than the proposed Project. (*Similar to Slightly Less Impact*)

## 4.6.5 Greenhouse Gas Emissions and Climate Change

The Site D – Reduced Project alternative would not include an addition to the Schilling Residence other than a basement. The total square footage of this alternative would be less and would offer fewer parking spaces as compared to the proposed Project, which could result in spillover parking. Because the square footage would be less, construction emissions would also be less. For these reasons, GHG emissions under the Site D – Reduced Project alternative would generate fewer emissions than the proposed Project. These emissions would be mitigated to zero consistent with the Placer County Tahoe Basin Area Plan Mitigation Measure 12-1. (*Similar to Slightly Less Impact*)

## 4.6.6 Noise

The Site D – Reduced Project alternative would construct a building similar to the proposed Project, and therefore, would require similar construction activities and equipment. Construction noise and vibration levels would be similar to those described for the proposed Project. The levels may be incrementally less under the Site D – Reduced Project alternative compared to the proposed Project because of the incrementally smaller site. Regarding operations, the number of special events would be similar to those described for the proposed Project, and therefore, operational (i.e., event, traffic) noise would be the same as described for the proposed Project. All noise impacts would be similar to those described for the proposed Project. (*Similar to Slightly Less Impact*)

## 4.6.7 Geology, Soils, Land Capability, and Coverage

Earth-moving activities associated with construction have the potential to affect geology, soils, and land coverage. The types of impacts that would occur from development of the Site D – Reduced Project include: increased TRPA regulated land coverage, increased erosion because of ground disturbance and soil compaction, and exposing buildings and people to seismic hazards. Existing regulations and permitting requirements, such as CBC requirements, NPDES permit conditions, and BMPs, would reduce potential impacts to a less-than-significant level. The area of impact would be slightly smaller due to the reduced size of the parking area. Therefore, the Site D – Reduced Project impacts to geology, soils, and land coverage would be similar but somewhat less than the proposed Project. (*Similar to Slightly Less Impact*)

## 4.6.8 Hydrology and Water Quality

Construction, earth-moving activities, and new development associated with the Site D – Reduced Project alternative have the potential to affect hydrology and water quality. The types of impacts that could occur from development of this alternative include: adverse effects on the surface and ground water quality, increased stormwater runoff, and alterations to existing drainage systems. Existing TRPA, Lahontan RWQCB, and Placer County regulations and permitting requirements, such as NPDES permit conditions, SWPPP, and temporary and permanent water quality BMPs would reduce potentially significant impacts to a less-than-significant level. The area of impact would be slightly smaller than the proposed Project, as well as Alternative A, due the reduced size of the parking area. Therefore, the Site D – Reduced Project alternative's impact to hydrology and water quality would be similar but somewhat less than the proposed Project. (*Similar to Slightly Less Impact*)

## 4.6.9 Utilities

The size of the lodge building associated with the Site D – Reduced Project alternative would be smaller than the lodge proposed by the proposed Project; thus, the water, wastewater, energy, and solid waste demands would be incrementally smaller than those of the proposed Project. Water supply, wastewater conveyance and treatment capacity, electricity and natural gas supplies, and capacity of solid waste collection facilities are sufficient to meet the demands of this alternative. The potential impacts of the Site D – Reduced Project alternative would be less than the proposed Project. (*Similar to Slightly Less Impact*)

## 4.6.10 Energy

The Site D – Reduced Project alternative would not include an addition to the Schilling Residence other than a basement. The total square footage of the alternative would be less as compared to the proposed Project, and the alternative would offer fewer parking spaces. Because the square footage would be less, construction energy consumption would also be less. For these reasons, energy consumption under the Site D – Reduced Project alternative would be less than that of the proposed Project. (*Similar to Slightly Less Impact*)

## 4.7 COMPARISON OF ALTERNATIVES

Table 4-2 summarizes the environmental analysis provided above for the Project alternatives.

**Table 4-2 Comparison of the Environmental Impacts of the Alternatives in Relation to the Proposed Project**

Environmental Topic	Proposed Project	No Project Alternative	Alternative A	Site A – Modified Project	Site D – Reduced Project
Biological Resources	LTS	NI	≤	≤	≤
Archaeological, Historical, and Tribal Cultural Resources	LTS	NI	≤	≤	≤
Transportation	LTS	NI	≤	≤	≤
Air Quality	LTS	NI	≤	≤	≤
Greenhouse Gas Emissions and Climate Change	LTS	NI	≤	≤	≤
Noise	LTS	NI	≤	≤	≤
Geology, Soils, Land Capability, and Coverage	LTS	NI	≤	≤	≤
Hydrology and Water Quality	LTS	NI	≤	≤	≤
Utilities	LTS	NI	> (LTS)	> (LTS)	≤
Energy	LTS	NI	≤	≤	≤

Impact Status:

LTS = Less Than Significant Impact

= Impacts would be similar to those of the proposed Project.

LTSM = LTS with Mitigation

< Impacts would be less than those of the proposed Project.

NI = No Impact

> Impacts would be greater than those of the proposed Project.

≤ Impacts would be less than or equal to those of the proposed Project.

≥ Impacts would be greater than or equal to those of the proposed Project.

Source: Compiled by Ascent Environmental in 2020

## 4.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines require an EIR to discuss whether an environmentally superior alternative is apparent from the analysis. Often, alternatives have environmental advantages and disadvantages, but no clearly superior alternative becomes evident, because the relative importance of environmental impacts varies based on their different priorities and/or sensitivities. Section 15126.6 of the State CEQA Guidelines states that "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." As the lead agency under CEQA, TCPUD elected to prepare this Draft EIR with a detailed evaluation of the environmental impacts of the proposed Project and one feasible alternative (i.e., Site A – Full Project alternative [Alternative A]), and a comparative evaluation of three additional feasible alternatives. While not required by CEQA, this approach was selected by the TCPUD Board to provide them with analysis of the proposed Project and Alternative A at an equal level of detail to allow them the flexibility to potentially approve a CEQA compliant project at either location. Possible reasons for this include, but are not limited to, insurmountable difficulty in obtaining permitting for the proposed Project, failure to complete the land exchange with the Conservancy, unavoidable environmental impacts of the proposed Project, and/or strong community and political opposition. In the event that any of these conditions occur, Alternative A is analyzed at this level of detail so that the EIR provides sufficient analysis to enable TCPUD to approve that alternative, should that course of action be taken by the Board.

The analysis in Section 4.4, above, demonstrates there would be no impacts from implementation of the No Project Alternative while the other alternatives would result in less-than-significant impacts or less-than-significant impacts after implementation of mitigation measures; thus, the No Project Alternative would be the environmentally superior alternative. For the reasons described herein, the following discussion provides a summary of the key environmental advantages and disadvantages of the proposed Project and action alternatives and whether any of those emerge as a clear, environmentally superior alternative.

### 4.8.1 Impacts Requiring Mitigation Measures

Table ES-1 in the Executive Summary chapter identifies the potential impacts of the proposed Project and Alternative A and whether the level of significance is less than significant, potentially significant, significant, and significant and unavoidable or if there would be no impact for each environmental issue area evaluated in this EIR. Sections 4.5 through 4.7, above, summarize the potential environmental effects of the Site A – Modified Project and Site D – Reduced Project alternatives in comparison to the proposed Project. All of the action alternatives, including the proposed Project, would be required to implement mitigation measures to reduce environmental effects related to biological resources; archaeological, historical, and tribal cultural resources; noise; and greenhouse gas emissions and climate change. Alternative A and the Site A – Modified Project alternative would also be required to implement a mitigation measure to reduce environmental effects related to the provision of adequate water supply to meet fire flow requirements. The proposed Project and the action alternatives would not result in any significant and unavoidable impacts. The comparison of the action alternatives in Table 4-2 indicates that the proposed Project and Site D – Reduced Project alternative would have fewer potentially significant impacts that would be reduced to a less-than-significant level with implementation of mitigation compared to Alternative A and Site A – Modified Project alternatives. Additionally, aside from the utilities impact associated with the Site A alternatives, the proposed Project and each of the action alternatives would result in similar less-than-significant impacts, with a minor margin of difference between these impacts from each of the alternatives and the proposed Project.

### 4.8.2 Impacts Related to Tree Removal, Coverage, Utilities, and Construction

The Site D alternatives would result in development of a previously undeveloped area and would result in the removal of a greater number of trees (Table 4-1), including trees greater than 30 inches dbh, and a greater amount of coverage than the Site A alternatives. More specifically regarding trees, the proposed Project would remove more than twice as many trees, including trees greater than 30 inches dbh, than Alternative A. Alternative A would remove

two incense cedar trees (measuring 24 and 26 inches dbh) and the proposed Project would remove one sugar pine tree (measuring 32 inches dbh), which are identified as species of limited occurrence in TRPA Code Section 61.1.4.B(1)(d). Regardless, the amount of new coverage would be allowable and all improvements and tree removal would comply with TRPA and other applicable regulations with implementation of Mitigation Measure 3.3-2. The Site A alternatives would require upgrades to the water conveyance system serving the site to meet fire flow standards, which would result in additional ground disturbance outside of the site. The demolition of the Existing Lodge that would occur with Alternative A would result in marginally greater, though still less-than-significant, construction-related impacts related to air quality, greenhouse gas emissions, noise, and solid waste because the proposed Project and the other action alternatives would not require any demolition.

### 4.8.3 Transportation Impacts

Traffic volumes in the Highlands neighborhood would not increase substantially over existing conditions for the proposed Project or any of the action alternatives when compared to users of cross-country ski trails and hiking and biking trail use. Increases in traffic in the Highlands neighborhood would generally be associated with special events, community events, and private events, which would occur primarily in the evenings or on weekends (see Tables 3.5-2 through 3.5-5 in Section 3.5, "Transportation"). Implementation of the proposed Project and Site D – Reduced Project would alter the pattern of vehicle traffic in the neighborhood; vehicles traveling to the Schilling Lodge would travel on Polaris Road instead of on Country Club Drive, which is the same road used for access to North Tahoe High School and North Tahoe Middle School. Additionally, the proposed Project could add traffic on Polaris Road at times when vehicles are traveling to and from North Tahoe High School and North Tahoe Middle School; however, as discussed in Impacts 3.5-1 and 3.5-2, neither implementation of the proposed Project or Alternative would degrade intersection or roadway operations to unacceptable levels or exceed Placer County's threshold for 2,500 vehicles per day on a residential street. The increase in unmitigated VMT would be greater under the proposed Project and Site D – Reduced Project alternative than with Alternative A and the Site A – Modified Project alternative; however, the proposed Project and all alternatives would be required to mitigate the net increase in VMT over the existing amount of VMT.

### 4.8.4 Beneficial Effects and Project Objectives

The proposed Project and each of the action alternatives would result in benefits that are not indicated by the impact conclusions, such as the Project's long-term beneficial effects related to enhancing recreational offerings; increased year-round opportunities for special events, community events, and private events; implementation of BMPs; and enhancing the financial sustainability of the TCCSEA.

All of the action alternatives would "feasibly attain most of the basic project objectives" as specified in State CEQA Guidelines Section 15126.6(a). However, the proposed Project would best meet the project objectives (identified in Sections 2.4 and 4.1.1) for the following reasons:

- ▶ The proposed Project and the Site D – Reduced Project alternative would increase the distance between the lodge and the nearest homes relative to the Site A alternatives. Through the provision of adequate onsite parking and the site's closer proximity to the North Tahoe High School that would help facilitate establishment of a shared-parking agreement between TCCSEA and the Truckee Tahoe Unified School District, the proposed Project would also minimize parking spillover onto residential streets relative to all of the other action alternatives. Although a shared-parking agreement could still be implemented with the Site A alternatives, due to the increased distance between the school and Site A, a shared-parking agreement would not be successful and would require shuttle traffic between the sites. For these reasons, the proposed Project would best meet the project objectives to minimize effects on the neighborhood and to remedy inadequate parking.
- ▶ The proposed Project and Site D – Reduced Project alternative would best meet the project objectives that include maximizing the base elevation of the lodge site and creating more user-friendly access to the cross-country trail system for beginner, disabled, and senior recreationists. Connections between the Site A alternatives

and the trail network are exposed and at a lower elevation (Site D is at an elevation of about 6,636 feet above mean sea level [msl], whereas Site A is located at 6,560 feet msl), and therefore do not hold snow as long as other portions of the trail network. Melted snow serves as a barrier between the Site A alternatives and the trail network. For the Site D alternatives, the lodge site and connections to the trail system are relatively flat and accommodating to users of all abilities. The existing tree canopy between the lodge associated with the Site D alternatives and the trail system would also help to better retain snow. For these reasons, the proposed Project and Site D – Reduced Project alternative would better meet these project objectives.

- ▶ The lodge associated with the proposed Project and Alternative A best meet the project objective to address operational deficiencies by providing adequate space for all aspect of operations at Tahoe XC. Because the total building area for the Site A – Modified Project and Site D – Reduced Project alternatives would be about 1,500 sq. ft. smaller and 3,900 sq. ft. smaller, respectively, than the proposed Project and Alternative A, these alternatives would not meet this objective as well.

#### 4.8.5 Conclusion

The potential environmental impacts and benefits that would result from implementation of the proposed Project and the action alternatives are substantially similar in magnitude. The proposed Project and the action alternatives would not result in any significant and unavoidable impacts. The comparison of the action alternatives in Table 4-2 indicates that the proposed Project and Site D – Reduced Project alternative would have fewer potentially significant impacts that would be reduced to a less-than-significant level with implementation of mitigation compared to Alternative A and the Site A – Modified Project alternative. The Site A alternatives would result in potential impacts to water supply that do not apply to the Site D alternatives. As described above, from a functional perspective, Alternative A, Site A – Modified Project alternative, and Site D – Reduced Project alternative would also not meet some of the project objectives as well as the proposed Project. For these reasons, the proposed Project would be the environmental superior alternative.