

February 2021



FINAL ENVIRONMENTAL IMPACT REPORT

Tahoe Cross-Country Lodge Replacement and Expansion Project

SCH No.: 2018062045



Tahoe City
Public Utility District

PREPARED FOR:

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TABLE OF CONTENTS

Section	Page
LIST OF ABBREVIATIONS	v
1 INTRODUCTION	1-1
1.1 Overview.....	1-1
1.2 Public Review Process.....	1-1
1.3 Purpose of this Final EIR.....	1-2
1.4 Organization of this EIR.....	1-2
2 REVISIONS TO THE DRAFT EIR	2-1
2.1 Corrections and Revisions to the Draft EIR	2-1
3 RESPONSES TO COMMENTS	3-1
3.1 List of Commenters on the Draft EIR.....	3-1
3.2 Master Responses	3-3
3.3 Comments and Responses.....	3-7
4 REFERENCES	4-1
5 REPORT PREPARERS	5-1
 Tables	
Table 3-1 List of Commenters.....	3-1

Appendix A - Transportation Demand Management Preliminary Measure Assessment

LIST OF ABBREVIATIONS

ADT	average daily traffic
Area Plan	Placer County Tahoe Basin Area Plan
C&D	construction and demolition
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CWA	Clean Water Act
dbh	diameter at breast height
diesel PM	diesel particulate matter
Draft EIR	Draft Environmental Impact Report
EIR/EIS	environmental impact report/environmental impact statement
EMFAC	EMissions FACtor
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
Final EIR	final environmental impact report
FTA	Federal Transit Administration
gpm	gallons per minute
HDM	Highway Design Manual
HRA	health risk assessments
IPCC	Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers
Lahontan RWQCB	Lahontan Regional Water Quality Control Board
lb/day	pounds per day
LOS	level of service
LSC	LSC Transportation Consultants, Inc.
LTAB	Lake Tahoe Air Basin
MMRP	Mitigation Monitoring and Reporting Program
NESHAP	National Emission Standard for Hazardous Air Pollutants
NOA	Notice of Availability
NO _x	Oxides of Nitrogen
NPS	National Park Service

NTPFD	North Tahoe Fire Protection District
NTMP	Neighborhood Traffic Management Program
PCAPCD	Placer County Air Pollution Control District
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
PRC	Public Resources Code
Project	Tahoe Cross-Country Lodge Replacement and Expansion Project
psi	per square inch
ROG	Reactive Organic Gases
SEZ	stream environment zone
SHPO	State Historic Preservation Office
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
Tahoe XC	Tahoe Cross-Country Center
TART	Tahoe Area Regional Transit
TCPUD	Tahoe City Public Utility District
TDM	Transportation Demand Management
TRPA	Tahoe Regional Planning Agency
VMT	vehicle miles traveled

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1 INTRODUCTION

Consistent with the California Environmental Quality Act (CEQA) requirements, this final environmental impact report (Final EIR) for the Tahoe Cross-Country Lodge Replacement and Expansion Project (Project) has been prepared under the direction of the Tahoe City Public Utility District (TCPUD), as the lead agency, according to the requirements of the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq. [14 CCR Section 15000 et seq.]).

This Final EIR contains responses to comments received on the Tahoe Cross-Country Lodge Replacement and Expansion Project Draft Environmental Impact Report (Draft EIR). The Draft EIR evaluated the environmental impacts of relocating, expanding, and adaptively reconstructing the historic Schilling residence into a new building, with construction of associated improvements, including a driveway and parking lot, utilities, landscaping, and outdoor community areas. The Final EIR consists of the Draft EIR and this document (response to comments document), which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 OVERVIEW

The Project is located along the northwest shore of Lake Tahoe near Tahoe City in Placer County (see Figure 2-1 in Chapter 2 of the Draft EIR). The proposed Project (Site D – Full Project) would relocate recreation and community uses currently provided at the existing Tahoe Cross-Country Lodge (Existing Lodge) to a new lodge site off Polaris Road adjacent to the North Tahoe High School and North Tahoe Middle School (see Figure 2-2 in Chapter 2 of the Draft EIR), approximately 0.65 mile from the Existing Lodge site.

The proposed Project would address existing operational deficiencies relative to circulation and parking, storage, staff facilities, and community space; better accommodate existing and future recreation demand; and improve the quality of the recreation user experience. Additionally, the Project would consolidate the existing accessory buildings (primarily storage) into a single facility, eliminate or minimize spillover parking on adjacent residential streets, and provide more amenities to serve guests and employees. These improvements would better serve additional recreational opportunities and community needs, especially in non-winter seasons. With construction of the Project, the Existing Lodge at the Highlands Community Center building would remain in its current location and continue to TCPUD community needs and functions. No changes are proposed to the existing Highlands Park trail system or adjacent trails on state property.

1.2 PUBLIC REVIEW PROCESS

On June 5, 2020, TCPUD released the Draft EIR for a 50-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the TCPUD website (<https://www.tcpud.org/capital-improvement-projects/tahoe-cross-country-lodge-replacement-and-expansion>); and one paper copy of the document was available outside the administrative office at 221 Fairway Drive in Tahoe City, California during business hours. A notice of availability of the Draft EIR was published in the Sierra Sun newspaper on June 5, 2020; submitted to the State Clearinghouse; and distributed to a mailing and email distribution list maintained, by TCPUD, for the Project.

A public meeting was held on July 17, 2020, to receive input from agencies and the public on the Draft EIR. The public meeting was recorded as part of the regular TCPUD Board meeting and posted to the TCPUD website. Oral comments submitted at the public meeting were recorded and are included in Chapter 3, "Responses to Comments," in this Final EIR.

As a result of these notification efforts, written and oral comments were received from federal and local agencies, organizations, and individuals on the content of the Draft EIR. Chapter 3, "Responses to Comments," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information," as defined by CEQA standards (State CEQA Guidelines Section 15088.5).

1.3 PURPOSE OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the Project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications to the Draft EIR, including Project clarifications, and revisions made in response to these comments as a result of the lead agency's ongoing planning efforts. The Final EIR will inform the TCPUD Board of Director's decision regarding whether to approve the proposed Project.

This Final EIR will also be used by CEQA responsible agencies to inform their decisions whether to approve permits or authorizations over which they have jurisdiction. Responsible agencies include the California Tahoe Conservancy, Placer County, Tahoe Regional Planning Agency, and Lahontan Regional Water Quality Control Board.

1.4 ORGANIZATION OF THIS EIR

This Final EIR is organized into chapters, as identified and briefly described below.

Chapter 1, Introduction, this chapter, provides the purpose of the Final EIR, summarizes the proposed Project, provides an overview of the CEQA public review process, and describes the contents of the Final EIR.

Chapter 2, Revisions to the Draft EIR, presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strikeouts~~ where text is removed and by underline where text is added.

Chapter 3, Responses to Comments, contains a list of all parties who submitted comments on the Draft EIR during the public review period, copies of all comments received, and responses to the comments.

Chapter 4, References, identifies the documents and individuals used as sources for the analysis in this Final EIR.

Chapter 5, Report Preparers, identifies the preparers of the document.

2 REVISIONS TO THE DRAFT EIR

This chapter presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify, or make minor modifications or corrections to information in the Draft EIR. Changes in the text are signified by ~~strikeout~~ where text is removed and by underline where text is added. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation, in accordance with State CEQA Guidelines Section 15088.5.

2.1 CORRECTIONS AND REVISIONS TO THE DRAFT EIR

This section presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strikeout~~, and text additions are shown in underline. The following revisions do not change the intent or content of the analysis or effectiveness of mitigation measures presented in the Draft EIR.

2.1.1 Revisions to the Executive Summary

In response to comments on the Draft EIR, interchangeable use of the terms Highlands Community Center, Community Center, and Existing Lodge is clarified. Paragraph 1 on page ES-1 of the Draft EIR is revised to read as follows:

The project applicant, the Tahoe Cross-Country Ski Education Association (TCCSEA), is proposing the Tahoe Cross-Country Lodge Replacement and Expansion Project (Project), which repurposes the historic Schilling ~~r~~Residence for use as a year-round recreation facility, with adequate size and site amenities to serve existing and future anticipated public recreation use. With implementation of the Project, the Highlands Park and Community Center (Community Center or Existing Lodge) would no longer serve as the lodge for the cross-country ski area; instead, the reconstructed Schilling ~~r~~Residence would serve that purpose. The Community Center would be retained in its current located and operated by the Tahoe City Public Utility District (TCPUD).

In response to comments received on the Draft EIR, Mitigation Measures 3.5-6a and 3.5-6b are revised to reflect clarifications to the Project and the difference between development review requirements considered to be part of the Project and mitigation measures required under CEQA. Table ES-1 on page ES-16 in the “Executive Summary” chapter is revised as shown on in the table on the following pages.

In response to a comment requesting clarification of Mitigation Measure 3.7-1 in the Draft EIR, the description of potential measures that may be used to reduce GHG emissions is revised to expand on the use of carbon offsets once onsite design features are implemented and to clarify that the Project does not include residential land uses. Text edits are made to Mitigation Measure 3.7-1 in Table ES-1 on pages ES-18 through ES-21 of the Draft EIR as shown in the table on the following pages.

The impact title for Impact 3.8-3 is revised in Table ES-1 in the Draft EIR to clarify that the impact analysis addresses all operational noise, not just noise generated from events. Minor editorial changes are also included in the impact summary. Table ES-1 on page ES-22 is revised as shown in the table on the following pages.

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
<p>Impact 3.5-6: Result in an Unmitigated Increase in Daily VMT The proposed Project and Alternative A would both result in increases in daily VMT. Therefore, implementation of the proposed Project or Alternative A would result in a VMT impact, which would be significant.</p>	<p>Proposed Project, Alternative A = S</p>	<p>Mitigation Measure 3.5-6a: Prepare and Implement a Transportation Demand Management Plan This mitigation measure would apply to the proposed Project and Alternative A. The applicant shall submit to Placer County a Transportation Demand Management Plan (TDM) as part of the development review process. A menu of measures that could be included in TDM plans is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. These measures include:</p> <ul style="list-style-type: none"> ▶ Preferential carpool/vanpool parking; ▶ Shuttle bus program; ▶ Transit pass subsidies; ▶ Paid parking; and ▶ Direct contributions to transit service. <p>Mitigation Measure 3.5-6b: Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero This mitigation measure would apply to the proposed Project and Alternative A. The applicant shall implement Mitigation Measure 3.7-1a and 3.7-1b identified in Section 3.7, "Greenhouse Gas Emissions and Climate Change." The applicant shall implement measures to reduce all GHG emissions associated with construction and operation of the Project to zero as detailed therein. More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets are provided in <u>Mitigation Measures 3.7-1a and 3.7-1b</u> Section 3.7.</p>	<p>Proposed Project, Alternative A = LTS</p>

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<p style="text-align: center;">NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable</p>			
<p>3.7 Greenhouse Gas Emissions and Climate Change</p>			
<p>Impact 3.7-1: Project-Generated Emissions of GHGs The proposed Project would result in construction-related GHG emissions totaling 841 MTCO₂e/year over a period of up to 4 years and would generate operational emissions of 316 MTCO₂e/year. Alternative A would result in construction-related GHG emissions totaling 922 MTCO₂e/year over a period of up to 4 years and would generate operational emissions slightly less than what is emitted for the proposed Project. These levels of emissions would not be consistent with Mitigation Measure 12-1 identified in the Area Plan EIR/EIS, which indicates that projects should achieve a no net increase in GHG emissions to demonstrate consistency with statewide GHG reduction goals. Proposed Project- and Alternative A-generated GHG emissions would be potentially significant.</p>	<p>Proposed Project, Alternative A = PS</p>	<p>Mitigation Measure 3.7-1a: Incorporate All Feasible Onsite Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero This mitigation measure would apply to the proposed Project and Alternative A. The applicant shall implement <u>all feasible</u> measures to reduce all GHG emissions associated with construction and operation of the Project to zero. More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets is provided below. <u>The GHG reductions achieved by the implementation of measures listed below shall be estimated by a qualified third-party selected by Placer County as the agency responsible for building permit issuance. All GHG reduction estimates shall be supported by substantial evidence. Mitigation measures should be implemented even if it is reasonable that their implementation would result in a GHG reduction, but a reliable quantification of the reduction cannot be substantiated. The Project applicant shall incorporate onsite design measures into the Project and submit verification to Placer County prior to issuance of building permits. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8).</u> <u>Construction-Related Greenhouse Gas Emissions</u> The applicant shall implement all onsite feasible measures to reduce GHGs associated with Project construction. Such measures shall include, but are not limited to the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD’s CEQA Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.</p> <ul style="list-style-type: none"> ▶ The applicant shall enforce idling time restrictions for construction vehicles. 	<p>Proposed Project, Alternative A = LTS</p>

		<ul style="list-style-type: none"> ▶ The applicant shall increase use of electric-powered construction equipment including use of existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators. ▶ The applicant shall require diesel-powered construction equipment to be fueled with renewable diesel fuel. The renewable diesel product that is used shall comply with California’s Low Carbon Fuel Standards and be certified by the California Air Resources Board Executive Officer. ▶ The applicant shall require that all diesel-powered, off-road construction equipment shall meet EPA’s Tier 4 emissions standards as defined in 40 Code of Federal Regulation (CFR) 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. ▶ The applicant shall implement waste, disposal, and recycling strategies in accordance with Sections 4.408 and 5.408 of the 2016 California Green Building Standards Code (CALGreen Code), or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of Project construction. ▶ Project construction shall achieve or exceed the enhanced Tier 2 targets for recycling or reusing construction waste of 65 percent for nonresidential land uses as contained in Sections A5.408 of the CALGreen Code. <p><u>Operational Greenhouse Gas Emissions</u></p> <p>The applicant shall implement all onsite feasible measures to reduce GHGs associated with operation of the Project. Such measures shall include but are not limited to, the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD’s Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.</p> <ul style="list-style-type: none"> ▶ The applicant shall achieve zero net energy (ZNE) if feasible. Prior to the issuance of building permits the Project developer or its designee shall submit a Zero Net Energy Confirmation Report (ZNE Report) prepared by a qualified building energy efficiency and design consultant to the county for review and approval. The ZNE Report shall demonstrate that development within the Project area subject to application of the California Energy Code has been designed and shall 	
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	<p>be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, or otherwise achieve an equivalent level of energy efficiency, renewable energy generation, or GHG emissions savings. This measure would differ from the achievement of zero net electricity because ZNE also concerns onsite consumption of natural gas.</p> <ul style="list-style-type: none"> ▶ The applicant shall consult with Liberty Utilities to assess the feasibility of onsite solar. If it is determined that onsite solar is feasible, the building shall include rooftop solar photovoltaic systems to supply electricity to the building. ▶ If onsite solar is determined to be feasible, the applicant shall install rooftop solar water heaters if room is available after installing photovoltaic panels. ▶ Any household appliances required to operate the building shall be electric and certified Energy Star-certified (including dish washers, fans, and refrigerators, but not including tankless water heaters). ▶ All buildings shall be designed to comply with requirements for water efficiency and conservation as established in the CALGreen Code. ▶ The applicant shall also provide Level 2 electric vehicle charging stations at a minimum of 10 percent of parking spaces that the Project. ▶ The applicant shall dedicate onsite parking for shared vehicles. ▶ The applicant shall require gas or propane outlets in private outdoor areas of residential land uses for use with outdoor cooking appliances such as grills if natural gas service or propane service is available. ▶ The applicant shall require the installation of electrical outlets on the exterior walls of both the front and back of proposed lodge to support the use of electric landscape maintenance equipment. ▶ The applicant shall require the use of energy-efficient lighting for all area lighting. <p>Notably, the California Air Pollution Officers Associations (CAPCOA) identifies parking restrictions as a feasible measure to reduce GHG emissions; however, parking restrictions have not been dismissed as infeasible onsite mitigation due to existing and projected community impacts associated with spill-over parking into nearby residential neighborhoods during peak seasonal periods. Nonetheless, even without limitations on parking availability, a no net increase in GHG emissions can be achieved.</p> <p><u>Carbon Offsets</u></p>	
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In addition to implementing all feasible onsite measures to reduction GHGs associated with construction and operation of the Project, the applicant shall offset the remaining levels of GHG emissions to zero by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits from any of the following recognized and reputable voluntary carbon registries:

- (A) American Carbon Registry;
- (B) Climate Action Reserve; and/or
- (C) Verra (formally named Verified Carbon Standard).

The applicant shall demonstrate that it has purchased and retired a sufficient quantity of carbon offsets prior to receipt of building permits from Placer County. The applicant shall purchase and retire a quantity of carbon credits sufficient to fully offset the Project's remaining operational emissions multiplied by the number of years of operation between commencement of operation and 2045, which is the target year of Executive Order B-55-18.

Mitigation Measure 3.7-1b: Purchase Real, Quantifiable, Permanent, Verifiable, Enforceable, and Additional Carbon Offsets

This mitigation measure would apply to the proposed Project and Alternative A.

If, following the application of all feasible onsite GHG reduction measures implemented under Mitigation Measure 3.7-1a, the proposed Project or Alternative A would continue to generate GHG emissions in exceedance of a net-zero threshold, the Project applicant shall offset the remaining GHG emissions before the end of the first full year of Project operation to meet the net-zero threshold by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits.

CARB recommends that lead agencies prioritize onsite design features, such as those listed under Mitigation Measure 3.7-1a, and direct investments in GHG reductions within the vicinity of a project site to provide potential air quality and economic co-benefits locally (CARB 2017). While emissions of GHGs and their contribution to climate change is a global problem, emissions of air pollutants, which have an adverse localized and regional impact, are often emitted from similar activities that generate GHG emissions (i.e., mobile, energy, and area sources). For example, direct investments in a local building retrofit program could pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, enhanced energy efficient windows, insulation, and water conservation features for homes within the geographic area of the Project. Other examples of local direct investments including financing of regional electric vehicle charging stations, paying for electrification of

	<p><u>public school buses, and investing in local urban forests. These types of investments result in a decrease in GHG emissions to meet the criteria of being real, quantifiable, permanent, verifiable, enforceable, and additional consistency with the standards set forth in Health and Safety Code Section 38562, subdivisions (d)(1) and (d)(2). Such credits shall be based on protocols approved by CARB, consistent with Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by Placer County, TRPA, or Placer County Air Pollution Control District (PCAPCD). Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) through the CAPCOA GHG Rx and PCAPCD.</u></p> <p><u>Prior to issuing building permits for Project development, Placer County shall confirm that the applicant or its designee has fully offset the Project's remaining (i.e., after implementation of GHG reduction measures pursuant to Mitigation Measure 3.7-1a) GHG emissions by relying upon one of the following compliance options, or a combination thereof:</u></p> <ul style="list-style-type: none"> ▶ <u>demonstration that the Project applicant has directly undertaken or funded activities that reduce or sequester GHG emissions that are estimated to result in GHG reduction credits (if such programs are available), and retire such GHG reduction credits in a quantity equal to the Project's remaining GHG emissions;</u> ▶ <u>demonstration that the applicant shall retire carbon credits issued in connection with direct investments (if such programs exist at the time of building permit issuance) in a quantity equal to the Project's remaining GHG emissions;</u> ▶ <u>undertake or fund direct investments (if such programs exist at the time of building permit issuance) and retire the associated carbon credits in a quantity equal to the Project's remaining GHG emissions; or</u> ▶ <u>if it is impracticable to fully offset the Project's GHG emissions through direct investments or quantifiable and verifiable programs do not exist, the applicant or its designee may purchase and retire carbon credits that have been issued by a recognized and reputable, accredited carbon registry in a quantity equal to the Project's remaining GHG Emissions.</u> 	
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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
<p>Impact 3.8-3: Operational Event Noise</p> <p>The proposed Project and Alternative A would be similar to what occurs in the Project vicinity now. Long-term increases in noise would be associated with outdoor recreational and sporting events at the Schilling Lodge. The increases in noise would not exceed applicable Area Plan noise standards (i.e., 55 dBA CNEL). Use of amplified sound would be required to comply with TCPUD rules and regulations and Placer County noise ordinance for operating hours; however, the use of amplified sound at the Schilling Lodge could result in exposure of sensitive receptors to noise levels that exceed the Placer County daytime (7:00 a.m. to 10:00 p.m.) noise standard of 50 dBA Leq for amplified sound sources. This impact would be significant for the proposed Project and Alternative A.</p>	<p>Proposed Project, Alternative A = S</p>	<p>Mitigation Measure 3.8-3 Minimize Amplified Sound</p> <p>This mitigation measure would apply to the proposed Project.</p> <ul style="list-style-type: none"> ▶ Building design and layout shall be such that any outdoor amplified speakers face away from offsite sensitive land uses and oriented/located such that the building structure is between the receiving land use and the attached speaker. Building design, layout, and final speaker location shall be identified in final site plans and approved by Placer County before issuance of building permits. ▶ To ensure receiving land uses are not exposed to noise levels that exceed Placer County daytime noise standards of 50 dBA Leq, outdoor speakers shall be tuned such that combined noise levels from all proposed speakers do not exceed 71 dBA Leq at 50 feet from the source. Sound levels shall be measured in accordance with Placer County Code Chapter 9.36.040 and proof of acceptable noise levels shall be provided to Placer County at the time of final building inspection. <p>This mitigation measure would apply to Alternative A.</p> <ul style="list-style-type: none"> ▶ Building design and layout shall be such that any outdoor amplified speakers face away from offsite sensitive land uses and oriented/located such that the building structure is between the receiving land use and the attached speaker. Building design, layout, and final speaker location shall be identified in final site plans and approved by Placer County before issuance of building permits. ▶ To ensure receiving land uses are not exposed to noise levels that exceed Placer County daytime noise standards of 50 dBA Leq, outdoor speakers shall be tuned such that combined noise levels from all proposed speakers do not exceed 59 dBA Leq at 50 feet from the source. Sound levels shall be measured in accordance with Placer County Code Chapter 9.36.040 and proof of acceptable noise levels shall be provided to Placer County at the time of final building inspection. 	<p>Proposed Project, Alternative A = LTS</p>

2.1.2 Revisions to Chapter 2 Description of the Proposed Project and Alternative Evaluated in Detail

In response to comments on the Draft EIR, the interchangeable use of the terms Highlands Community Center, Community Center, and Existing Lodge is clarified. Paragraph 1 on page 2-1 of the Draft EIR is revised to read as follows:

The Tahoe Cross-Country Lodge Replacement and Expansion Project (Project) has three (3) distinct elements: (1) to relocate, expand, and adaptively reconstruct the historic Schilling residence into a new building (the Schilling Lodge), (2) to construct associated improvements, including a driveway and parking lot, utilities, landscaping, and outdoor community areas, and (3) to relocate the functions and operations of the Tahoe Cross-Country ~~Ski Area Center~~ (Tahoe XC) to a new location. The current location of the Tahoe XC is near the north shore of Lake Tahoe (see Figure 2-1) at the Highlands Park and Community Center (Community Center or Existing Lodge), located approximately 0.65 mile from the proposed Project location on a site off Polaris Road.

In response to comments on the Draft EIR, Section 2.3, "Existing Operations and Facilities," is revised to clarify the use of the 500-gallon fuel tank at the Existing Lodge. Paragraph 4 on page 2-3 of the Draft EIR is revised to read as follows:

During winter operations, the Existing Lodge amenities include space for ticketing, rentals, retail, waxing skis, a café, and storage. Existing exterior buildings include a yurt that is used for the Winter Discovery Center and seven small buildings or structures that provide storage for cross-country ski equipment. Fueling is conducted at an existing 500-gallon fuel tank at the Highlands Community Center.

In response to comments on the Draft EIR, the "Proposed Schilling Lodge" section is revised to clarify the use of a generator at the Schilling Lodge in the event of power outages. The fifth paragraph on page 2-7 is revised to read as follows:

Unlike the Existing Lodge, the Schilling Lodge would have space dedicated for public lockers, public showers, staff administrative functions, first aid, a team room, and a garage (see Figure 2-3). The Schilling Lodge would have space dedicated for public meetings; whereas, the Existing Lodge relies on the yurt for public meetings. The increase in space at the Schilling Lodge would be accommodated by the repurposed Schilling residence, an addition to the building, and a basement. A visual representation of the Schilling Lodge facility is shown in Figure 2-4 below. A generator would be installed at the Schilling Lodge that could be used in the event of a power outage.

In response to comments on the Draft EIR, Section 2.5.1, "Project Characteristics," is revised to clarify the Project's intent to use a gas fireplace and not allow wood burning at the Schilling Lodge. Paragraph 4 on page 2-10 of the Draft EIR is revised to read as follows:

Main Level

The Project utilizes the high design values of the historic Shilling residence as the main public area of the Schilling Lodge. This space would house the primary social spaces proposed, including a lounge, small meeting space and café kitchen in repurposed rooms such as the living room, dining room, and former kitchen. The main level would also support spaces such as restrooms, ticket counter and retail space. The proposed arrangement of these spaces, locating the ticket and café counters near each other, allows for reduced staff, improved internal circulation between use areas, and a more efficient operation compared to the current facility. The original fireplace would be retained but would be repurposed as a gas fireplace and would not be wood burning. If use of the outdoor fireplace would occur then it would also operate as a gas fireplace and would not be wood burning.

In response to comments on the Draft EIR, the description of the proposed Project is refined to more clearly define the Project and the roadway frontage improvements that would be required as part of the Project. A new paragraph is added after the third full paragraph (“Parking” section) under Section 2.5.1, “Project Characteristics,” on page 2-11 of the Draft EIR as follows:

ROADWAY IMPROVEMENTS

As required by the Placer County Tahoe Basin Area Plan Implementing Regulations (Section 3.06), roadway improvements along the proposed Project site parcel frontage at Polaris Road or along the Alternative A site parcel frontage at Country Club Drive would be constructed consistent with the Placer County Design Standards and Guidelines. For the proposed Project, the improvements along the parcel frontage at Polaris Road would include the construction/reconstruction of a 16-foot paved section from the existing centerline to a Traffic Index of 6.0 plus curb, gutter, and a 6-foot wide sidewalk. Traffic Index is used to determine necessary pavement thickness. For Alternative A, the improvements along the parcel frontage at Country Club Drive would include the construction/reconstruction of an 11-foot paved section from the existing centerline to a Traffic Index of 6.0 plus curb, gutter, and a 6-foot wide sidewalk.

In response to comments on the Draft EIR, Table 2-2 is revised to clarify the tree removal estimate for the Project and the proposed amount of bicycle parking by expressing the bicycle parking in bike spaces instead of bike racks. Table 2-2 on page 2-12 of the Draft EIR is revised to read as follows:

Table 2-2 Site Development Features

Item	Description	Existing Conditions	Proposed Project (Site D)	Alternative A	
Parking	Proposed parking would meet the typical need and avoid overflow street parking in the neighborhood	46 total spaces ¹ (approx. 16,820 sq. ft.)	100 total parking spaces ² (59,799 sq. ft.)	100 total parking spaces (49,446 sq. ft.)	
		2 disabled parking spaces	4 disabled parking spaces	4 disabled parking spaces	
		0	2 bus parking spaces	2 bus parking spaces	
School Connector	Driveway and walkway to allow shared parking; locked gate during school hours for security purposes	NA	60 – 70 linear feet	NA	
Patio	For external gathering with picnic tables and outdoor grill and sink	1,345 sq. ft.	6,808 sq. ft.	6,808 sq. ft.	
Kinder Sled Storage	Protected external storage to prevent damage	Along building in parking lot	80 sq. ft.	80 sq. ft.	
Walkways	ADA accessible	N/A	N/A	N/A	
Bike Racks	New bike racks would be provided to allow for more secure bike parking	0	<u>2 racks</u> <u>Minimum of 15 short-term bicycle parking spaces</u>	<u>2 racks</u> <u>Minimum of 10 short-term bicycle parking spaces</u>	
Yurt	Existing structure moved to a new site to meet ADA standards	706 sq. ft.	706 sq. ft.	706 sq. ft.	
Trees to be Removed ³	The new facilities would require tree removal	Total	NA	183	79
		Trees > 30 inches dbh	NA	15	7

Table 2-2 Site Development Features

Item	Description	Existing Conditions	Proposed Project (Site D)	Alternative A
New Land Coverage	Includes asphalt, building, walkways/concrete, and miscellaneous utility needs.	76,455 sq. ft. for the Alternative A site 12,334 sq. ft. for the proposed Project site ⁴	81,593 sq. ft. ⁵	67,619 sq. ft. ⁶
Site Grading/Excavation	Site grading and excavation for the parking lot, driveway, and basement; excavated material to be hauled off site	NA	3,728 cu. yd. cut/ 1,785 cu. yd. fill	3,446 cu. yd. cut/ 1,723 cu. yd. fill

Notes: cu. yd. = cubic yards; sq. ft. = square feet; dbh = diameter at breast height, NA = not applicable; N/A = not available

¹ During the parking surveys conducted for the Transportation Impact Analysis (see Appendix D), 51 cars were observed to be parked in the parking lot. Additional offsite wintertime parking is allowed under permit from Placer County, which typically accommodates up to 50 vehicles.

² Under the proposed Project, because the 46 parking spaces at the Highlands Community Center would be retained, the total amount of parking spaces that would be available at the Schilling Lodge and the Highlands Community Center would be 146 parking spaces.

³ Tree removal impacts are discussed in Section 3.3, "Biological Resources." These tree removal estimates are based on preliminary Project design and the number of trees to be removed would be refined throughout the Project approval and permitting process.

⁴ This amount of coverage for the Existing Conditions is the existing coverage and does not include any new coverage. Existing coverage includes compacted soil areas on trails and impervious surfaces as shown by the 2010 TRPA LiDAR data within the land capability districts and on the parcels in which construction for the proposed Project or Alternative A.

⁵ 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."

⁶ 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."

Source: Compiled by TCCSEA in 2018

In response to comments and coordination with Placer County regarding applicability of Area Plan EIR/EIS mitigation measures, new text is added to Section 2.5.2, "Placer County Tahoe Basin Area Plan Mitigation Measures," beginning on page 2-20 of the Draft EIR as follows:

2.5.2 Placer County Tahoe Basin Area Plan Mitigation Measures

The Area Plan is a joint TRPA/Placer County plan, adopted in 2016 by the Placer County Board of Supervisors and in 2017 by the TRPA Governing Board. The plan incorporates TRPA goals and regulations but also includes additional land use regulations to implement and achieve the environmental improvement and redevelopment goals of the Lake Tahoe Regional Plan and the TRPA/Tahoe Metropolitan Planning Organization Regional Transportation Plan/Sustainable Communities Strategy while also addressing local goals. A full scope environmental impact report/environmental impact statement (EIR/EIS) was prepared for the Area Plan, and because the Tahoe Cross-Country Lodge Replacement and Expansion Project is located within the Area Plan boundaries, it is required to comply with its policies and implementing regulations. The Project is ~~also~~ required to contribute to implementation of the Area Plan EIR/EIS mitigation measures that were developed ~~as part of the EIR/EIS~~ to avoid, minimize, or mitigate potentially significant and significant environmental effects. Applicable mitigation measures identified in the Area Plan EIR/EIS that would be implemented as part of the Project are limited to the following to address issues related to transportation, air quality, and greenhouse gas emissions:

- ▶ Mitigation Measure 10-1b: Establish a County Service Area Zone of Benefit to Fund Expansion of Transit Capacity. The Project would develop a transit zone of benefit County Service Area Zone of Benefit during the County's development review process.

- ▶ Mitigation Measure 10-1c: Payment of Traffic Mitigation Fees to Placer County. The Project applicant would be required to pay traffic mitigation fees during the County's development review process.
- ▶ Mitigation Measure 10-1d: Expand Requirements for Transportation Demand Management Plans.
- ▶ Mitigation Measure 10-5: Create a Transit Service Expansion Funding Source Pursuant to Mitigation Measure 10-1b. This mitigation measure requires implementation of Area Plan EIR/EIS Mitigation Measure 10-1b, which is listed above.
- ▶ Mitigation Measure 11-2a: Reduce Short-Term Construction-Generated Emissions of Reactive Organic Gases (ROG), Oxides of Nitrogen (NO_x), and Respirable Particulate Matter with Aerodynamic Diameter of 10 Micrometers or Less (PM₁₀). The potential short-term construction-generated emissions of ROG, NO_x, and PM₁₀ from the Project are assessed in Impact 3.6-1 in Section 3.6, "Air Quality."
- ▶ Mitigation Measure 11-5: Reduce Short-Term Construction-Generated Toxic Air Contaminants (TAC) Emissions. The potential short-term construction-generated emissions of ROG, NO_x, and PM₁₀ from the Project are assessed in Impact 3.6-4 in Section 3.6, "Air Quality."
- ▶ Mitigation Measure 12-1: Implement All Feasible Greenhouse Gas Reduction Measures to Achieve No Net Increase in Emissions. The requirements of this mitigation measure are incorporated into Mitigation Measure 3.7-1a.

In response to updated estimates provided by the applicant and as a result of the duration of the environmental review period as well as anticipated permits and approvals, the estimated timing for construction to begin on the Project is updated in Chapter 2 of the Draft EIR. The first paragraph under Section 2.5.3, "Construction Schedule and Activities," on page 2-22 is updated as follows:

2.5.3 Construction Schedule and Activities

Groundbreaking for the proposed Project is anticipated to begin in ~~spring 2024~~2022 with completion of the Project anticipated ~~by spring 2023~~in 2024. Site utilities and the parking lot ~~would be estimated to be completed by fall 2022~~October 2021. Completion of the Schilling Lodge and all associated improvements such as installing furniture, art, artifacts, donor plaque, and equipment would occur in ~~2024~~May 2023, with an opening planned for ~~2024~~June 2023. Any necessary site revegetation and trail connections needed to connect the Schilling Lodge to existing trails would be completed during summer ~~2024~~2023. In the early Project planning stages, Project construction was anticipated to potentially occur over up to four construction seasons; however, it is ~~likely possible~~ that Project construction could occur in as few as 2 years.

An editorial change is made to the "TCPUD-Conservancy Land Exchange" section in Chapter 2 of the Draft EIR to correct a typographical error in the parcel numbers on which the proposed Project is located. The fourth paragraph on page 2-16 of the Draft EIR is revised to read as follows:

The Highlands Properties, currently owned by the Conservancy, comprise three parcels, totaling about 15.3 acres. Figure 2-5 shows the location of the Highlands Properties parcels relative to the proposed Project at Site D and the Alternative A site. The first parcel, APN 093-160-058, is located at the westerly terminus of Cedarwood Drive and is approximately 3 acres. The remaining two parcels, APNs 093-160-064 and -028, are located north of Polaris Road and east of North Tahoe High School and North Tahoe School. APN ~~093-160-064~~~~093-190-064~~ is about 12 acres and APN ~~093-160-028~~~~093-190-028~~ is about 0.3 acre. The Highlands Properties are adjacent to the TCPUD 45-acre Highlands Park and Community Center property. The proposed Project would be constructed on 5.2 acres, including a portion of APN 093-160-064. While the land exchange would support implementation of the proposed Project, it would also create single ownership of the underlying property associated with the existing TCPUD integrated trail system operated by TCCSEA. It would also provide direct connection between the trail system and the school, which would create optimal land management efficiencies for TCPUD irrespective of the final location and/or approval of the proposed Schilling Lodge.

An editorial change is made to the first paragraph under Section 2.6.1, "Proposed Project (Site D – Full Project)," to correct the punctuation around the in-text citation as follows:

2.6.1 Proposed Project (Site D - Full Project)

The proposed Project site is 5.2 acres of land off of Polaris Road, adjacent to North Tahoe High School at an elevation of 6,636 feet above mean sea level (msl). The proposed Project would site the Schilling Lodge and parking lot 370 feet from the nearest resident (see Figure 2-2). The location of this site would also place the lodge adjacent to beginner terrain, which would improve access for beginning skiers. This site is located in the North Tahoe High School Subdistrict and zoned for recreation in the Area Plan; the proposed Project site also has a land use designation of Recreation in the Area Plan and the TRPA Regional Plan (Placer County and TRPA 2017, TRPA 2018).

In response to a comment on the Draft EIR, the "Highlands Community Center" section is revised to clarify that TCPUD would be in control of booking community use of or events at the Highlands Community Center. The last paragraph on page 2-24 of the Draft EIR is revised to read as follows:

Where feasible and possible, requests for use of the Existing Lodge community space would be directed to TCCSEA for primary consideration to access and use the Schilling Lodge. In instances where the Schilling Lodge is not available, the Highlands Community Center could be made available to the community, but only under the number and type of requests as described in Table 2-5. TCPUD would be in control of any community use of or events at the Highlands Community Center. These uses could include community meetings, recreation classes, special events, multi-purpose room, fundraisers, and would comply with the current patron capacity of the building and parking lot. While community use of the Highlands Community Center would be considered secondary to the Schilling Lodge, other specific future TCPUD uses that would be a change from proposed and existing uses are unknown at this time and are therefore not considered part of this Project. Over time, TCPUD would assess improvement needs, such as rehabilitation or upgrades, but would continue to use the Highlands Community Center in a manner consistent with TCPUD public facilities. Cross-country skiers, hikers, trail runners, and mountain bikers could continue to park at the Highlands Community Center and access nearby trails from that location. TCPUD would staff the Highlands Community Center only as needed.

2.1.3 Revisions to Section 3.1 Approach to the Environmental Analysis

In Section 3.1, "Approach to the Environmental Analysis," the description in the text related to significant-and-unavoidable impacts that may occur on page 3-2 of the Draft EIR is revised to correct the State CEQA Guidelines reference as follows:

This subsection also describes whether mitigation measures would reduce Project impacts to less-than-significant levels. Significant-and-unavoidable impacts are identified as appropriate in accordance with State CEQA Guidelines Section 15126.2(c**b**). Significant-and-unavoidable impacts are also summarized in Chapter 5, "Other CEQA-Mandated Sections."

In response to comments and to clarify current understanding of the Dollar Creek Crossing project as a cumulative project, the description of the Dollar Creek Crossing project in the third column of the ninth row in Table 3.1-2 on page 3-5 in the Draft EIR is revised as follows:

Placer County is in the preliminary planning stages with a developer for an affordable housing project at this site. Because of the nature of the project in its early planning stages, a preliminary estimate of the number of multi-family residential units that would be allowed for these parcels was calculated using the density limits in the Area Plan and the parcel area; it is estimated that the development could include up to 214 residential units that would primarily be multi-family units with a few single-family units. This estimate does not

account for site constraints or other considerations that could ultimately reduce the number of residential units. Additionally, it is possible that, once submitted, the project application would propose a mix of multi-family and single-family residential units and community spacecommercial. As of January 2020, the low end estimate of residential units is 174 and the upper limit estimate is 204. Two of the options propose access to the site from SR 28 and Fabian Way. One option proposes access to the site from SR 28, Fabian Way, and Village Road. At this time, it is assumed that vehicle access to the project site would be provided on Fabian Way and State Route (SR) 28.

2.1.4 Revisions to Section 3.2 Effects Not Found to be Significant

In response to a comment on the Draft EIR, the analysis of impacts on the visual character or quality of the site is clarified as it relates to tree removal for the proposed Project and Alternative A. A new paragraph is added after the third paragraph on page 3-7 as follows:

The nearest residence to the proposed Project site is located 370 feet south of the Schilling Lodge and parking lot. The proposed Project would only remove trees within the footprint of the Schilling Lodge, driveway and parking lot, and trees in the surrounding forest (including within the viewing distance between nearby residences and the parking lot) that would provide screening would be retained. The number of trees that could be removed by either the proposed Project or Alternative A are identified in Table 2-2 on page 2-12 in Chapter 2, "Description of the Proposed Project and Alternatives Evaluated in Detail," in the Draft EIR. Figure 2-5 on page 2-17 in Chapter 2 of the Draft EIR shows an aerial photo of the existing forest, adjacent school, and nearby residences along with an overlay of the Schilling Lodge, parking lot, and driveway. As seen in the aerial photo, many trees are located between those facilities included in the proposed Project and the nearest residences. The presence of these trees between the Schilling Lodge facilities and nearby residences would limit and screen views of those facilities. Impacts related specifically to tree removal are detailed under Impact 3.3-2 beginning on page 3.3-17 in Section 3.3, "Biological Resources," of the Draft EIR. Although trees would be removed to construct the proposed Project, nearby residents would continue to have views of the forest that would limit their view of the Schilling Lodge and would retain the visual character of the forested area.

To address editorial issues, the fourth paragraph on page 3-7 of the Draft EIR is revised as follows:

Because the proposed Project and Alternative A would be designed to blend with the natural setting and be compatible within the context of ~~the~~ both sites and the surroundings in compliance with applicable regulations, neither would degrade the existing visual character or quality of ~~the~~ either site nor their surroundings. Additionally, the proposed Project and Alternative A would be consistent with the height and design standards required by the Area Plan or the TRPA Scenic Quality Improvement Program or Design Review Guidelines.

In response to comments on the Draft EIR, Section 3.2.3, "Hazards and Hazardous Materials," is revised to clarify the existing use and planned continued use of a 500-gallon fuel tank. The last paragraph on page 3-9 of the Draft EIR is revised to read as follows:

During operation of the Schilling Lodge, future use and storage of hazardous materials would include fertilizers and pesticides typically used for landscaping and household cleaners that would be used for routine maintenance and would be similar to those used under existing conditions. Hazardous materials similar to those used during construction could also be used periodically as part of operation, maintenance, and repair of infrastructure, equipment, and facilities. Winter operations would also continue to conduct limited refueling for onsite equipment at the proposed Project site or Alternative A site consistent with existing conditions. With implementation of the proposed Project, the existing 500-gallon fuel tank at the Highlands Community Center would be moved to the proposed Project site and its use would continue to comply with the existing permit through the Placer County Air Pollution District (McNair, pers. comm., 2020).

In response to comments on the Draft EIR, Section 3.2.3, "Hazards and Hazardous Materials," is revised to clarify the NESHAP requirements that would apply to demolition of the Existing Lodge under Alternative A. Paragraph 2 on page 3-10 of the Draft EIR is revised to read as follows:

Federal and state regulations govern the renovation and demolition of structures where materials containing lead and asbestos could be present. Asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services. Demolition of any building, such as demolition of the Existing Lodge under Alternative A, that could contain asbestos (based on the age of the building) would be regulated as an Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) Regulated Facility. An Asbestos NESHAP Regulated Facility is subject to a thorough asbestos inspection of the facility and testing of materials to determine whether asbestos is present that must be conducted by a California Occupational Safety and Health Administration- (Cal/OSHA-) certified asbestos consultant (Cal/OSHA regulations, California Labor Code, Sections 9021.5 through 9021.8). Demolition projects require a NESHAP Notification even if there is found to be no asbestos present after testing. Section 1532.1 in Title 8 of the California Code of Regulations addresses construction work where an employee may be occupationally exposed to lead. An advisory note shall be included on improvement plans for Alternative A identifying applicable NESHAP requirements, including requirements related to surveying for asbestos, notifications, and removal of asbestos. In compliance with Cal/OSHA regulations, surveys for indicators of lead-based coatings, and flakes in soil, would be conducted before demolition of the Existing Lodge under Alternative A to further characterize the presence of lead on the Alternative A site. Loose or peeling paint may be classified as a hazardous waste if concentrations exceed total threshold limits. Cal/OSHA regulations require air monitoring, special work practices, and respiratory protection during demolition and paint removal where even small amounts of lead have been detected. Agency notification and compliance with California Department of Health Services and Cal/OSHA regulations would require that the presence of these materials be verified and remediated, which would eliminate potential health risks associated with exposure to asbestos or lead during building demolition associated with Alternative A. For this reason, this impact would be less than significant, and no mitigation would be required.

2.1.5 Revisions to Section 3.3 Biological Resources

In response to comments and to clarify potential cumulative biological resources impacts of the Dollar Creek Crossing project, the cumulative impact analysis on pages 3.3-26 and 3.3-27 in Section 3.3, "Biological Resources," of the Draft EIR is revised as follows:

The primary biological resource issues relevant to cumulative impacts, where the proposed Project or Alternative A have the potential to contribute to impacts generated by other projects, are effects related to special-status plant species (Impact 3.3-1), tree removal (Impact 3.3-2), invasive plant species (Impact 3.3-3), and wildlife movement (Impact 3.3-4). Past projects and activities have resulted in the decline of some native plant populations and rarity of some species, and the introduction and spread of various noxious weeds and other invasive plant species in the Project region, resulting in habitat degradation and other adverse effects on biological resources. The current presence and spread of noxious weeds and invasive species in the Project region, and the decline of some native plant populations and species, are considered significant cumulative impacts. The significance level of existing cumulative effects related to tree removal and wildlife movement generally in the Tahoe region is less clear. Existing and foreseeable future projects have the potential to continue these trends, although current policies, regulations, and programs currently minimize the potential for the further spread of noxious weeds and invasive species and loss of rare or special-status plants. For example, the Dollar Creek Crossing project is proposed on 11.5 acres of undeveloped land near the proposed Project and Alternative A sites. The proposed Dollar Creek Crossing project is located adjacent to residential development, neighborhood roads, and SR 28 and a portion of the site has been previously disturbed. However, the site may provide opportunities for wildlife movement and construction of the project could disturb wildlife movement in the area. While the Dollar Creek Crossing project may result in preserving

60 percent of the site for open space, construction activities would still result in tree removal and have the potential to adversely affect special-status plant species and cause the spread of invasive plant species.

Implementation of either the proposed Project or Alternative A would remove native trees 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. However, natural vegetation types on the proposed Project and Alternative A sites (i.e., Sierran mixed conifer and perennial grassland) are fragmented and highly disturbed; and the quality of habitat for native species is limited by existing disturbances and degradation from residential, recreation, and commercial uses on and near either site; adjacent roads; and associated edge effects. As described in detail for Impacts 3.3-1, 3.3-2, 3.3-3, and 3.3-4, direct or indirect effects on these biological resources as a result of the proposed Project or Alternative A would be relatively minor. Additionally, with implementation of Mitigation Measure 3.3-1, potential disturbances or loss of special-status plants would be avoided, minimized, or compensated for. With implementation of Mitigation Measure 3.3-3, invasive plant management practices would be implemented during Project construction and the inadvertent introduction and spread of invasive from Project construction would be prevented.

The proposed Project or Alternative A, when combined with past, present, and reasonably foreseeable future projects, including the Dollar Creek Crossing project, would not substantially affect the distribution, breeding productivity, population viability, or the regional population of any common or special-status species; or cause a change in species diversity locally or regionally. Additionally, Project implementation, would not threaten, regionally eliminate, or contribute to a substantial reduction in the distribution or abundance of any native habitat type in the Tahoe region. Therefore, the Project **would not have a considerable contribution** to any significant cumulative impact related to biological resources.

2.1.6 Revisions to Section 3.4 Archaeological, Historical, and Tribal Cultural Resources

In response to a comment about clarifying the correct name of the Highlands neighborhood, Impact 3.4-1 is revised. Paragraph 3 on page 3.4-14 of the Draft EIR is revised to read as follows:

The Schilling Residence has been evaluated as eligible as a historic resource under Section 67.6 of the TRPA Code and as eligible for listing in the NRHP under Criterion C related to its architectural character and construction type. The Project proposes to relocate the residence from its original location in Tahoma, adjacent to Rubicon Bay, to the Highlands ~~Park residential~~ neighborhood on lands designated for recreation.

In response to comments and to clarify potential cumulative cultural resources impacts of the Dollar Creek Crossing project, the fifth paragraph on page 3.4-19 in Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," is revised as follows:

No known unique archaeological resources, TCRs, or human remains are located within the boundaries of the proposed Project site or Alternative A site; nonetheless, Project-related earth-disturbing activities could damage undiscovered archaeological resources, TCRs, or human remains. Like the proposed Project and Alternative A and other projects listed in Table 3-1, ground-disturbing activities for the Dollar Creek Crossing project could result in discovery or damage of as-yet undiscovered archaeological resources or uncover or destroy previously unknown archaeological resources with ethnic or cultural values. The proposed Project or Alternative A, in combination with other development in the region, such as the Dollar Creek Crossing project, could contribute to ongoing substantial adverse changes in the significance of unique archaeological resources resulting from urban development and conversion of natural lands. Cumulative development could result in potentially significant archaeological resource impacts.

2.1.7 Revisions to Section 3.5 Transportation

In response to comments and coordination with Placer County regarding applicability of Area Plan EIR/EIS mitigation measures, new text is added on page 3.5-4 of the Draft EIR as follows:

The environmental document prepared for the Area Plan (i.e., ~~the Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project EIR/EIS~~ [Area Plan EIR/EIS]) identified plan-level mitigation that would apply to all new construction located within the Area Plan boundaries. Placer County and TRPA developed mitigation measures to address transportation impacts of the Area Plan. Mitigation Measures ~~10-1b, 10-1c, and 10-1d,~~ and 10-5 are shown below, ~~would apply to the Project, and would be implemented during the Placer County development review process, which is described in Section 2.5.2, "Placer County Tahoe Basin Area Plan Mitigation Measures," in Chapter 2, "Proposed Project and Alternative Evaluated in Detail" (Placer County and TRPA 2016):~~

Mitigation Measure 10-1b: Establish a County Service Area Zone of Benefit to fund expansion of transit capacity

The key constraint to expanding transit capacity is the availability of ongoing transit operating subsidy funding, as discussed in the recently completed System Plan Update for the Tahoe Truckee Area Regional Transit in Eastern Placer County (LSC 2016). While the proposed Area Plan includes Policy T-P-22 ("Secure adequate funding for transit services so that transit is a viable transportation alternative"), it does not identify a specific mechanism to assure expansion of transit services to address increased peak demand. To provide an ongoing source of operating funding as well as transit bus seating capacity, Placer County shall establish one or more County Service Area Zones of Benefit encompassing the developable portions of the Plan area. Ongoing annual fees would be identified to fund expansion of transit capacity as necessary to expand seating capacity to accommodate typical peak-period passenger loads. At a minimum, this would consist of four additional vehicle-hours of transit service per day throughout the winter season on each of the following three routes: North Shore (North Stateline to Tahoe City), SR 89 (Tahoe City to Squaw Valley), and SR 267 (North Stateline to Northstar), as well as the expansion of transit fleet necessary to operate this additional service. Fees would be assessed on all future land uses that generate an increased demand for transit services, including residential, lodging, commercial, civic, and recreational land uses.

Mitigation Measure 10-1c: Payment of Traffic Mitigation Fees to Placer County

Prior to issuance of any Placer County Building Permits, projects within the Area Plan shall be subject to the payment of established Placer County traffic impact fees that are in effect in this area, pursuant to applicable county Ordinances and Resolutions. Traffic mitigation fees shall be required and shall be paid to the Placer County Department of Public Works and Facilities subject to the County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code. The fees will be calculated using the information supplied. If the use or the square footage changes, then the fees will change. The actual fees paid will be those in effect at the time the payment occurs.

Mitigation Measure 10-1d: Expand Requirements for Transportation Demand Management Plans

To reduce peak-period vehicle trips and improve LOS, future development project proposals which will employ between 20 and 100 employees and/or include tourist accommodation or recreational uses will be required to submit to Placer County a Transportation Demand Management Plan (TDM) upon Development Review. The current threshold for preparation of a TDM or Employee Transportation Plan (TRPA Code Section 65.5.2.B) and compliance with the Placer County Trip Reduction Ordinance (Placer County Code Section 10.20) is 100 or more employees in a single location which applies to a very limited number of sites in the Plan area. This existing requirement also does not address trips that are generated from sources other than employee commutes, and in the Plan area, a large proportion of peak period trips are the result of tourist or visitor trips rather than employee trips.

Development of the expanded requirements for TDM plans will consider trip sources and characteristics in the Plan area during peak periods. This mitigation measure will expand the requirements for TDM plans with criteria that would require some employers with fewer than 100 employees to prepare such plans and implement through project mitigation for LOS impacts.

A menu of measures that could be included in TDM plans is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. These measures include but are not limited to:

- ▶ Preferential carpool/vanpool parking;
- ▶ Shuttle bus program;
- ▶ Transit pass subsidies;
- ▶ Paid parking; and
- ▶ Direct contributions to transit service.

Mitigation Measure 10-5: Create a transit service expansion funding source pursuant to Mitigation Measure 10-1b.

This impact would be minimized through the implementation of Mitigation Measure 10-1b described under Impact 10-1, above. This same mitigation measure would be required to address this impact.

To correct a grammatical error in the text of Impact 3.5-4, the third full paragraph on page 3.5-25 of the Draft EIR is revised as follows:

Tahoe XC is hosts to several large annual athletic events, which are generally limited to two or three per season and not more than seven per year. These events can draw an attendance of up to approximately 250 people, including participants, organizers, volunteers, and spectators. In addition to these large athletic events, up to two premier events (e.g., the Great Ski Race) would occur at the site each year, which can draw an attendance of up to about 500 people. The premier events already occur at the Existing Lodge, and no new premiere events would occur as a result of Project implementation.

In response to comments received on the Draft EIR, the VMT impact analysis under Impact 3.5-6 and associated mitigation measures are revised to more clearly define the Project and the difference between development review requirements considered to be part of the Project and mitigation measures required under CEQA. A new paragraph is added after the third full paragraph on page 3.5-29 of the Draft EIR as follows:

Impact 3.5-6: Result in an Unmitigated Increase in Daily VMT

The proposed Project and Alternative A would both result in increases in daily VMT. Therefore, implementation of the proposed Project or Alternative A would result in a VMT impact, which would be **significant**.

The effect of the proposed Project and Alternative A on VMT depends on the origin and destination of vehicles traveling to and from the respective sites. Project-generated VMT within the Tahoe Basin was determined based on Project trip generation and distribution to and from the various portions of the Tahoe Basin. The change in VMT resulting from implementation of the Project is estimated based upon the net increase in regional vehicle trips generated by the Project multiplied by the average trip distance to each area. The calculated VMT are presented in Table 3.5-11.

The proposed Project and Alternative A would both be required to implement a TDM plan as part of the development review process to ensure consistency with Area Plan Policy T-P-12. A menu of measures that could be included in the TDM plan is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. The individual measures that would be included as part of the plan are not known at this time; thus, to ensure a conservative analysis, the VMT analysis does not apply any trip reductions associated with implementation of the required TDM plan.

As shown in Table 3.5-11, the proposed Project and Alternative A are estimated to generate an increase of approximately 1,140 VMT and 973 VMT, respectively, over the course of a peak summer day relative to existing conditions.

Proposed Project

The proposed Project is estimated to generate approximately 1,140 VMT over the course of a peak summer day relative to existing conditions. Unmitigated operational emissions of GHGs generated by automobile travel to and from the proposed Project site were modeled and shown in Section 3.7, "Greenhouse Gas Emissions and Climate Change," to demonstrate the net difference in operational activity between baseline conditions and the proposed Project. The Project would result in an increase in daily VMT to the proposed Project site; and thus, as detailed in Section 3.7, "Greenhouse Gas Emissions and Climate Change," would not be consistent with the regional goal of reducing VMT. Therefore, implementation of the proposed Project would result in an increase in VMT; and thus, this impact would be **significant**.

Page 3.5-31 in Section 3.5, "Transportation," of the Draft EIR is revised as follows:

Mitigation Measures

Mitigation Measure 3.5-6a: Prepare and Implement a Transportation Demand Management Plan

~~This mitigation measure would apply to the proposed Project and Alternative A.~~

~~The applicant shall submit to Placer County a Transportation Demand Management Plan (TDM) as part of the development review process. A menu of measures that could be included in TDM plans is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. These measures include:~~

- ~~▶ Preferential carpool/vanpool parking;~~
- ~~▶ Shuttle bus program;~~
- ~~▶ Transit pass subsidies;~~
- ~~▶ Paid parking; and~~
- ~~▶ Direct contributions to transit service.~~

Mitigation Measure 3.5-6b: Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero

This mitigation measure would apply to the proposed Project and Alternative A.

The applicant shall implement Mitigation Measures 3.7-1a and 3.7-1b identified in Section 3.7, "Greenhouse Gas Emissions and Climate Change." The applicant shall implement measures to reduce all GHG emissions associated with construction and operation of the Project to zero as detailed therein. More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets are provided in Mitigation Measures 3.7-1a and 3.7-1b~~Section 3.7~~.

Significance after Mitigation

~~Implementation of Mitigation Measure 3.5-6a would require~~ The applicant would be required to prepare and implement a TDM plan as part of the County development review process to reduce ~~Project-generated~~ daily VMT to the maximum degree feasible. Additionally, implementation of Mitigation Measure 3.5-6b requires the applicant to implement Mitigation Measures 3.7-1a and 3.7-1b that are cross-referenced here and detailed in Section 3.7, "Greenhouse Gas Emissions and Climate Change," which require the proposed Project and Alternative A to implement measures to reduce all GHG emissions associated with construction and operation to fully mitigate GHG emissions, which includes offsetting any unmitigated GHG emissions to zero by purchasing carbon offsets. As detailed above, when evaluating VMT impacts of a project TRPA also considers the corresponding GHG emissions. Therefore, the TDM plan would reduce VMT to the extent feasible as part of

the Project and all remaining GHG emissions would be reduced to zero with implementation of Mitigation Measure 3.5-6. For these reasons, the proposed Project and Alternative A would not result in an unmitigated increase in daily VMT and this impact would be reduced to **less than significant**.

In response to comments and to clarify potential cumulative transportation impacts of the Dollar Creek Crossing project, the description of the Dollar Creek Crossing project in the third bullet starting on page 3.5-31 of the Draft EIR is revised as follows:

The potential Dollar Creek Crossing project is located in the northeast corner of the SR 28/Fabian Way intersection. As this project is in the early planning stages, the specific details regarding the proposed land uses and site access were not available at the time of completion of the traffic modeling. Thus, a preliminary estimate of 169 new multi-family residential units was assumed to be constructed, with 50 percent of the vehicle trips to and from the site accessing the property via a driveway on SR 28 and the other 50 percent assumed to access the site via a potential new driveway on Fabian Way. Standard Institute of Transportation Engineers (ITE) trip generation rates were used to estimate the trip generation for the 169 units. As of May 2019, the Dollar Creek Crossing project proponents indicated that the project could include up to 214 residential units, which would almost entirely be multi-family residential units and a few single-family residential units. As of January 2020, the low end estimate of residential units is 174 and the upper limit estimate is 204. The difference between the modeled number of residential units and the most recent available greater numbers of residential units presented in May 2019 and January 2020, is are not anticipated to result in a substantial change in the cumulative traffic analysis such that there would be a change in the impact conclusions discussed below.

2.1.8 Revisions to Section 3.6 Air Quality

In response to a comment on the Draft EIR, Table 3.6-1 on page 3.6-2 of the Draft EIR is revised to show the current carbon monoxide standard for the Lake Tahoe region. Table 3.6-1 on page 3.6-2 of the Draft EIR is revised as follows:

Table 3.6-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS ^{1,2}	NAAQS ³	
			Primary ^{2,4}	Secondary ^{2,5}
Ozone	1-hour	0.09 ppm (180 µg/m ³)	— ^e	Same as primary standard
	8-hour	0.070 ppm (137 µg/m ³)	0.070 ppm (147 µg/m ³)	
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	Same as primary standard
	8-hour	6 ppm ^{4, 6} (40 µg/m ³)	9 ppm (10 mg/m ³)	
Nitrogen dioxide (NO ₂)	Annual arithmetic mean	0.030 ppm (57 µg/m ³)	53 ppb (100 µg/m ³)	Same as primary standard
	1-hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	—
Sulfur dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	—	—
	3-hour	—	—	0.5 ppm (1300 µg/m ³)
	1-hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	—
Respirable particulate matter (PM ₁₀)	Annual arithmetic mean	20 µg/m ³	—	Same as primary standard
	24-hour	50 µg/m ³	150 µg/m ³	
Fine particulate matter (PM _{2.5})	Annual arithmetic mean	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
	24-hour	—	35 µg/m ³	Same as primary standard
Lead	Calendar quarter	—	1.5 µg/m ³	Same as primary standard
	30-Day average	1.5 µg/m ³	—	—
	Rolling 3-Month Average	—	0.15 µg/m ³	Same as primary standard

Table 3.6-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS ^{1,2}	NAAQS ³	
			Primary ^{2,4}	Secondary ^{2,5}
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m ³)		No national standards
Sulfates	24-hour	25 µg/m ³		
Vinyl chloride ⁷	24-hour	0.01 ppm (26 µg/m ³)		
Visibility reducing particulate matter	8-hour	Extinction of 0.23 per km		

Notes: CAAQS = California ambient air quality standards, NAAQS = national ambient air quality standards, µg/m³ = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million

¹ California standards for ozone, carbon monoxide, SO₂ (1- and 24-hour), NO₂, particulate matter, and visibility reducing particles are values that are not to be exceeded. All others are not to be equal or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

² Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

³ National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. The PM₁₀ 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. The PM_{2.5} 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. Environmental Protection Agency for further clarification and current federal policies.

⁴ National primary standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

⁵ National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

⁶ The California ambient air quality standards are 9 parts per million; however, in the Lake Tahoe Air Basin, this standard is 6 parts per million (7 mg/m³). CARB established this more stringent standard in 1976 based on the Lake Tahoe Basin's elevation and associated thinner air.

⁷ The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: CARB 2016

In response to a comment on the Draft EIR related to Placer County Air Pollution Control District (PCAPCD) air quality monitoring equipment, this section is revised to update the location of the PCAPCD respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}) monitoring sites in Tahoe City. The following text edit is made to paragraph 1 on page 3.6-5 of the Draft EIR.

The overall effectiveness of these measures and other efforts to attain and maintain air quality standards will continue to be monitored through a comprehensive multi-agency air quality program. The existing air quality monitoring program is being expanded to ensure adequate data continues to be available to assess the status and trends of a variety of constituents. In 2011, TRPA established additional ozone and PM monitoring at the Stateline Monitoring Site. Working under a cooperative agreement with TRPA, PCAPCD installed additional ozone and PM_{10/2.5} monitors in Tahoe City and Kings Beach in 2011 (though the monitor at Kings Beach is no longer operated). In 2013, TRPA installed an additional Visibility Monitoring Station and an ozone monitor in South Lake Tahoe.

In response to a comment on the Draft EIR, a correction is made to Table 3.6-3 to reflect the current attainment status of ozone for the Lake Tahoe Air Basin. Table 3.6-3 on page 3.6-11 of the Draft EIR is revised as follows:

Table 3.6-3 Attainment Status Designations for Placer County¹

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Ozone	–	Attainment (1-hour)
	Unclassified/Attainment (8-hour) ^{1 2}	Attainment (8-hour)
	Nonattainment Unclassified/Attainment (8-hour) ^{2 3}	
Respirable particulate matter (PM ₁₀)	Attainment (24-hour)	Nonattainment (24-hour)
		Nonattainment (Annual)
Fine particulate matter (PM _{2.5})	Attainment (24-hour)	–
	Attainment (Annual)	Attainment (Annual)
Carbon monoxide (CO)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Nitrogen dioxide (NO ₂)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (Annual)	Attainment (Annual)
Sulfur dioxide (SO ₂) ³	Unclassified/Attainment (1-Hour)	Attainment (1-hour)
		Attainment (24-hour)
Lead (Particulate)	Attainment (3-month rolling avg.)	Attainment (30 day average)
Hydrogen Sulfide	No Federal Standard	Unclassified (1-hour)
Sulfates		Attainment (24-hour)
Visibly Reducing Particles		Unclassified (8-hour)
Vinyl Chloride		Unclassified (24-hour)

Notes:

¹ 1997—Standard: Placer County, as a whole, resides within three discrete air basins (i.e., Mountain Counties Air Basin, Sacramento Valley Air Basin, and Lake Tahoe Air Basin). The attainment designations within this table apply to the portion of Placer County that is located within the Lake Tahoe Air Basin, where the Project is located.

² 2008 ~~2010~~ – Standard

³ ~~2010~~ 2015 – Standard

Source: CARB 2018

In response to comments on the Draft EIR, Impact 3.6-4 is revised to clarify use of a generator at the Schilling Lodge in the event of power outages. The following discussion is added on page 3.6-17 preceding paragraph six in Section 3.6, “Air Quality,” in the Draft EIR:

A generator would be installed at the Schilling Lodge to be used in the event of a power outage. This generator would be obtained in accordance with the applicable permitting process overseen by PCAPCD. The generator would be anticipated to run for brief 10- to 15-minute increments every week to ensure that the generator continues to be operational. This level of operation would be minimal and would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a hazards index of 1.0 or greater. Therefore, construction activities and their respective contribution of TACs comprise the focus of this analysis.

In response to comments and to clarify potential cumulative impacts of the Dollar Creek Crossing project, a new paragraph is added after the first paragraph on page 3.6-19 in Section 3.6, “Air Quality,” of the Draft EIR as follows:

The Dollar Creek Crossing project would result in development of up to an estimated 204 residential units that could result in greater construction and operational emissions than the proposed Project or Alternative A and

could result in a potentially significant impact on regional air quality. However, the project would be required to reduce significant impacts to the extent feasible and would be required to pay the air quality mitigation fee required by TRPA Code Section 65.2, which would offset the project's contribution to cumulative air quality impacts. Other cumulative projects in Table 3.1-2 would similarly be required to reduce potentially significant air quality impacts, which would reduce contributions to a cumulative air quality impact.

2.1.9 Revisions to Section 3.7 Greenhouse Gas Emissions and Climate Change

In response to a comment on the Draft EIR, the "TRPA Best Construction Practices Policy for Construction Emissions" section is revised to update the location of the PCAPCD respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}) monitoring sites in Tahoe City. The following text edit is made to paragraph 4 on page 3.7-4 of the Draft EIR:

The overall efficacy of these measures and other efforts to attain and maintain air quality standards will continue to be monitored through a comprehensive multi-agency air quality program. The existing air quality monitoring program is being expanded to ensure adequate data continues to be available to assess the status and trends of a variety of constituents. In 2011, TRPA established additional ozone and particulate monitoring at the Stateline Monitoring Site. Working under a cooperative agreement with the TRPA, the Placer County Air Pollution Control District (PCAPCD) installed additional ozone and PM_{10/2.5} monitors in Tahoe City ~~and Kings Beach~~ in 2011. In 2013, TRPA installed an additional Visibility Monitoring Station and an ozone monitor in South Lake Tahoe.

Because the estimated timing for construction of the Project to begin has been delayed from originally anticipated in the Draft EIR, estimated construction timing for the Project included in the fourth paragraph on page 3.7-13 of the Draft EIR is revised as follows:

[c]onsistent with Chapter 65 of the TRPA Code of Ordinances, construction of the Project was assumed to be limited to May 1 through October 15. Based on assumptions developed in the initial planning stages for the Project, construction was assumed to commence on May 1, 2020 and end in June 2023, when the Project would become operational. However, as described under Section 2.5.3, "Construction Schedule and Activities," Project construction activities may be completed faster, estimated to beginning in 2021 instead of 2020 and completed in 2 years rather than 4 years. Construction would be limited to Monday through Friday within exempt hours.

In response to a comment on the Draft EIR, Impact 3.7-1, "Project-Generated Emissions of GHGs," is revised to clarify the conservative nature of the GHG emission modeling. The fourth paragraph on page 3.7-15 of the Draft EIR is revised to read as follows:

Proposed Project construction activities would result in the generation of GHG emissions. Heavy-duty off-road construction equipment, materials transport, and worker commute during construction of the Project would result in exhaust emissions of GHGs. There would be no construction associated with the Highlands Community Center. Table 3.7-4 summarizes the projected emissions associated with construction of the Project by year (2020-2023). As mentioned above under "Methods and Assumptions," and in Section 2.5.3, "Construction Schedule and Activities," the Project was initially anticipated to be constructed over an up to 4 year period and was anticipated to begin in 2020, which is reflected in Table 3.7-4 below. In the event that construction activities are completed faster than presented here, beginning in 2021 instead of 2020 and completed in as few as 2 years rather than 4 years, the GHG emissions shown in separate years in the table would be combined over fewer years. The emissions generated over a shorter timeframe would not change the impact conclusion provided below. Additionally, if construction activities begin at a later time than initially anticipated, potentially lower levels of GHG emissions would be generated as a result of compliance with regulatory mechanisms that reduce transportation and energy-related emissions such as CARB's Advanced Clean Cars program and the Renewable Portfolio Standards' yearly renewable targets under Senate Bill 100. See Appendix D for detailed input parameters and modeling results.

In response to comments on the Draft EIR, Impact 3.7-1 is revised to clarify use of a generator at the Schilling Lodge in the event of power outages. The first paragraph on page 3.7-16 in the Draft EIR is revised to read as follows:

The Existing Lodge currently supports the Tahoe Cross-Country facility. With implementation of the proposed Project, operations at the Highlands Community Center would continue at a lower rate as compared to existing conditions as these activities would be redirected to the proposed Project site. As such, operational emissions of GHGs were modeled to demonstrate the net difference in operational activity between baseline conditions and the proposed Project. Operational emissions of GHGs would be generated by automobile travel to and from the proposed Project site, electricity usage, natural gas combustion, water usage, wastewater and solid waste generation, ~~and~~ area sources such as landscaping equipment, and the periodic use of a 40 horsepower generator. The analysis of GHG emissions also includes operation of the Existing Lodge with some community meetings and recreation classes. These emissions associated with the proposed Project are summarized in Table 3.7-5 for 2023, the first year of proposed Project operation.

In response to a comment requesting clarification of Mitigation Measure 3.7-1 in the Draft EIR, the description of potential measures that may be used to reduce GHG emissions is revised to clarify that the Project does not include residential land uses.

Mitigation Measure 3.7-1 on pages 3.7-17 through 3.7-19 of the Draft EIR is revised as follows:

Mitigation Measure 3.7-1a: Incorporate All Feasible Onsite Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero

This mitigation measure would apply to the proposed Project and Alternative A.

The applicant shall implement all feasible measures to reduce all GHG emissions associated with construction and operation of the Project to zero. ~~More detail about measures to reduce construction related GHGs, operational GHGs, and the purchase of carbon offsets is provided below.~~ The GHG reductions achieved by the implementation of measures listed below shall be estimated by a qualified third-party selected by Placer County as the agency responsible for building permit issuance. All GHG reduction estimates shall be supported by substantial evidence. Mitigation measures should be implemented even if it is reasonable that their implementation would result in a GHG reduction, but a reliable quantification of the reduction cannot be substantiated. The Project applicant shall incorporate onsite design measures into the Project and submit verification to Placer County prior to issuance of building permits. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8).

Construction-Related Greenhouse Gas Emissions

The applicant shall implement all onsite feasible measures to reduce GHGs associated with Project construction. Such measures shall include, but are not limited to, the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD's CEQA Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.

- ▶ The applicant shall enforce idling time restrictions for construction vehicles.
- ▶ The applicant shall increase use of electric-powered construction equipment including use of existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators.
- ▶ The applicant shall require diesel-powered construction equipment to be fueled with renewable diesel fuel. The renewable diesel product that is used shall comply with California's Low Carbon Fuel Standards and be certified by the California Air Resources Board Executive Officer.

- ▶ The applicant shall require that all diesel-powered, off-road construction equipment shall meet EPA's Tier 4 emissions standards as defined in 40 Code of Federal Regulation (CFR) 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068.
- ▶ The applicant shall implement waste, disposal, and recycling strategies in accordance with Sections 4.408 and 5.408 of the 2016 California Green Building Standards Code (CALGreen Code), or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of Project construction.
- ▶ Project construction shall achieve or exceed the enhanced Tier 2 targets for recycling or reusing construction waste of 65 percent for nonresidential land uses as contained in Sections A5.408 of the CALGreen Code.

Operational Greenhouse Gas Emissions

The applicant shall implement all onsite feasible measures to reduce GHGs associated with operation of the Project. Such measures shall include, but are not limited to, the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD's Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.

- ▶ The applicant shall achieve zero net energy (ZNE) if feasible. Prior to the issuance of building permits the Project developer or its designee shall submit a Zero Net Energy Confirmation Report (ZNE Report) prepared by a qualified building energy efficiency and design consultant to the county for review and approval. The ZNE Report shall demonstrate that development within the Project area subject to application of the California Energy Code has been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, or otherwise achieve an equivalent level of energy efficiency, renewable energy generation, or GHG emissions savings. This measure would differ from the achievement of zero net electricity because ZNE also concerns onsite consumption of natural gas.
- ▶ The applicant shall consult with Liberty Utilities to assess the feasibility of onsite solar. If it is determined that onsite solar is feasible, the building shall include rooftop solar photovoltaic systems to supply electricity to the building.
- ▶ If onsite solar is determined to be feasible, the applicant shall install rooftop solar water heaters if room is available after installing photovoltaic panels.
- ▶ Any household appliances required to operate the building shall be electric and certified Energy Star-certified (including dish washers, fans, and refrigerators, but not including tankless water heaters).
- ▶ All buildings shall be designed to comply with requirements for water efficiency and conservation as established in the CALGreen Code.
- ▶ The applicant shall also provide Level 2 electric vehicle charging stations at a minimum of 10 percent of parking spaces that the Project.
- ▶ The applicant shall dedicate onsite parking for shared vehicles.
- ▶ The applicant shall require gas or propane outlets in private outdoor areas of residential land uses for use with outdoor cooking appliances such as grills if natural gas service or propane service is available.
- ▶ The applicant shall require the installation of electrical outlets on the exterior walls of both the front and back of proposed lodge to support the use of electric landscape maintenance equipment.
- ▶ The applicant shall require the use of energy-efficient lighting for all area lighting.

Notably, the California Air Pollution Officers Associations (CAPCOA) identifies parking restrictions as a feasible measure to reduce GHG emissions; however, parking restrictions have not been dismissed as infeasible onsite mitigation due to existing and projected community impacts associated with spillover parking into nearby residential neighborhoods during peak seasonal periods. Nonetheless, even without limitations on parking availability, a no net increase in GHG emissions can be achieved.

Mitigation Measure 3.7-1b: Purchase Real, Quantifiable, Permanent, Verifiable, Enforceable, and Additional Carbon Offsets

If, following the application of all feasible onsite GHG reduction measures implemented under Mitigation Measure 3.7-1a, the proposed Project or Alternative A would continue to generate GHG emissions in exceedance of a net-zero threshold, the Project applicant shall offset the remaining GHG emissions before the end of the first full year of Project operation to meet the net-zero threshold by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits.

CARB recommends that lead agencies prioritize onsite design features, such as those listed under Mitigation Measure 3.7-1a, and direct investments in GHG reductions within the vicinity of a project site to provide potential air quality and economic co-benefits locally (CARB 2017). While emissions of GHGs and their contribution to climate change is a global problem, emissions of air pollutants, which have an adverse localized and regional impact, are often emitted from similar activities that generate GHG emissions (i.e., mobile, energy, and area sources). For example, direct investments in a local building retrofit program could pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, enhanced energy efficient windows, insulation, and water conservation features for homes within the geographic area of the Project. Other examples of local direct investments including financing of regional electric vehicle charging stations, paying for electrification of public school buses, and investing in local urban forests. These types of investments result in a decrease in GHG emissions to meet the criteria of being real, quantifiable, permanent, verifiable, enforceable, and additional consistency with the standards set forth in Health and Safety Code Section 38562, subdivisions (d)(1) and (d)(2). Such credits shall be based on protocols approved by CARB, consistent with Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by the County, TRPA, or Placer County Air Pollution Control District (PCAPCD). Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) through the CAPCOA GHG Rx and PCAPCD. In addition to implementing all feasible onsite measures to reduction GHGs associated with construction and operation of the Project, the applicant shall offset the remaining levels of GHG emissions to zero by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits from any of the following recognized and reputable voluntary carbon registries:

- (A) American Carbon Registry;
- (B) Climate Action Reserve; and/or
- (C) Verra (formally named Verified Carbon Standard).

The applicant shall demonstrate that it has purchased and retired a sufficient quantity of carbon offsets prior to receipt of building permits from Placer County. The applicant shall purchase and retire a quantity of carbon credits sufficient to fully offset the Project's remaining operational emissions multiplied by the number of years of operation between commencement of operation and 2045, which is the target year of Executive Order B-55-18.

Prior to issuing building permits for Project development, Placer County shall confirm that the applicant or its designee has fully offset the Project's remaining (i.e., after implementation of GHG reduction measures pursuant to Mitigation Measure 3.7-1a) GHG emissions by relying upon one of the following compliance options, or a combination thereof:

- ▶ demonstration that the Project applicant has directly undertaken or funded activities that reduce or sequester GHG emissions that are estimated to result in GHG reduction credits (if such programs are available), and retire such GHG reduction credits in a quantity equal to the Project's remaining GHG emissions;
- ▶ demonstration that the applicant shall retire carbon credits issued in connection with direct investments (if such programs exist at the time of building permit issuance) in a quantity equal to the Project's remaining GHG emissions;
- ▶ undertake or fund direct investments (if such programs exist at the time of building permit issuance) and retire the associated carbon credits in a quantity equal to the Project's remaining GHG emissions; or
- ▶ if it is impracticable to fully offset the Project's GHG emissions through direct investments or quantifiable and verifiable programs do not exist, the applicant or its designee may purchase and retire carbon credits that have been issued by a recognized and reputable, accredited carbon registry in a quantity equal to the Project's remaining GHG Emissions.

Significance after Mitigation

TCPUD notes that the list of recommended measures includes limiting the number of parking spaces as a means of reducing GHG emissions. This item has not been included in Mitigation Measure 3.7-1a, because the community has expressed concern regarding the intrusion of spillover parking into residential neighborhoods. TCPUD would like to minimize spillover parking. For this reason, sufficient parking has been provided to avoid significant spillover parking problems. TCPUD notes that, even without limiting the supply of onsite parking, the threshold—no net increase of GHG emissions—can be achieved.

Implementation of Mitigation Measures 3.7-1a and 3.7-1b would ensure that the proposed Project or Alternative A would not result in a net increase in GHG emissions and, thus, would not conflict with CARB's 2017 Scoping Plan or any established statewide GHG reduction targets (i.e., SB 32 of 2016 and Executive Order B-55-18). Thus, the proposed Project's or Alternative A's contribution to climate change would be reduced to **less than significant**.

In response to comments and to clarify the potential cumulative impacts of the Dollar Creek Crossing project, the last paragraph on page 3.7-19 in Section 3.7, "Greenhouse Gas Emissions and Climate Change," of the Draft EIR is revised as follows:

As noted previously, climate change is global phenomenon and the result of cumulative emissions of greenhouse gases from emissions sources across the globe. Therefore, climate change impacts, including impacts from cumulative projects such as the Dollar Creek Crossing project, are inherently cumulative in nature and discussed above under Impact 3.7-1.

2.1.10 Revisions to Section 3.8 Noise

In response to a comment on the Draft EIR, Impact 3.8-3 is updated to include noise analysis for the intermittent use of a generator as part of the Project. In addition to the new paragraph after the fifth paragraph on page 3.8-17, editorial changes are made as shown to the impact title and impact summary:

Impact 3.8-3: Operational Event Noise

The proposed Project and Alternative A would be similar to what occurs in the ~~p~~Project vicinity now. ~~L~~Long-term increases in noise would be associated with outdoor recreational and sporting events at the Schilling Lodge. The increases in noise would not exceed applicable Area Plan noise standards (i.e., 55 dBA CNEL). Use of amplified sound would be required to comply with TCPUD rules and regulations and Placer County noise ordinance for operating hours; however, the use of amplified sound at the Schilling Lodge could result in exposure of sensitive receptors to noise levels that exceed the Placer County daytime (7:00 a.m. to 10:00 p.m.) noise standard of 50 dBA L_{eq} for amplified sound sources. This impact would be **significant** for the proposed Project and Alternative A.

Proposed Project

The Schilling Lodge would provide internal and external space for a variety of uses and events. Regarding long-term increases in operational noise, the primary (i.e., loudest) noise sources would be associated with community, private, and special events occurring at the Schilling Lodge. Events that could occur at the Schilling Lodge would be similar in nature to events that currently occur at the existing Highlands Community Center, located at the Alternative A site. The Schilling Lodge location would be adjacent to the North Tahoe High School and associated outdoor sporting facilities that currently host regular outdoor sporting events.

Regarding operational noise sources, the Project would include a new, small (i.e., 40 horsepower), back-up generator, that would be used periodically for short periods of time for regular testing maintenance and in the event of a power outage. Due to the relatively infrequent use of the generator, this noise source would not be considered a substantial increase in noise. Further, Section 9.36.030 of the Placer County code exempts noise sources from equipment associated with property maintenance, which includes stationary mechanical equipment, provided that noise occurs during the daytime hours. Consistent with typical work hours (e.g., 8:00 a.m. to 5:00 p.m.) maintenance personnel would perform any necessary work during daytime hours, consistent with Placer County code, and people are less sensitive to noise. Thus, the proposed generator would not result in a long-term substantial increase in noise that would exceed an applicable standard.

In response to comments and to clarify potential cumulative impacts of the Dollar Creek Crossing project, the discussion of cumulative noise impacts on pages 3.8-21 and 3.8-22 in Section 3.8, "Noise," of the Draft EIR is revised as follows:

Construction Noise and Vibration Levels

Impacts related to short-term ~~p~~Project-related construction noise and vibration levels are localized in nature, based on audibility and distance to sensitive receptors. The proposed Project and Alternative A potential construction noise and vibration impacts are discussed in Impacts 3.8-1 and 3.8-2, above. The construction noise and vibration sources from construction of the proposed Project or Alternative A in conjunction with other cumulative projects, such as the Dollar Creek Crossing project located approximately 1 mile from the proposed Project site and 0.5 mile from the Alternative A site, would not accumulate to cause broader environmental impacts, so by their nature, cumulative impacts would not occur. Therefore, the contribution of construction noise and vibration from the proposed Project or Alternative A **would not be cumulatively considerable**.

Operational Event Noise

Noise generated by outdoor events and gatherings at the Schilling Lodge would primarily influence the immediate ~~p~~Project vicinity, as noise levels would diminish at increasing distances from the source. Further, anticipated noise levels from the events would not exceed applicable standards, and therefore, noise levels at increasing distance from the proposed Project site and Alternative A site would be even lower, thus would not combine with other area sources. Further, events at the Schilling Lodge would be infrequent and temporary and

would implement Mitigation Measure 3.8-3 that would require amplified noise at events to meet performance standards to ensure that noise levels would be below Placer County noise standards and reduce the impact to a less-than-significant level. Considering the anticipated low noise volumes described in Impact 3.8-3, above, and the temporary and infrequent nature of the events, noise would not combine with noise sources from cumulative projects, including the Dollar Creek Crossing project located approximately 1 mile from the proposed Project site and 0.5 mile from the Alternative A site, to result in substantial increases in noise. Therefore, the contribution from the proposed Project or Alternative A **would not be cumulatively considerable**.

Operational Traffic Noise

Operation of the project would result in additional traffic on local roads associated with events taking place at the Schilling Lodge as described in Impact 3.8-4, above. In the future cumulative scenario, additional growth and development is anticipated associated with the cumulative projects in Table 3.1-2 that would likely also result in additional traffic on local and regional roadways. However, traffic increases associated with the proposed Project and Alternative A are directly associated with the anticipated size of the events being held at the lodge, which would not change in the cumulative scenario. Visitation at the lodge is and would continue to be driven by the cross-country ski trails, use of the trails in the summer, special and other events at the lodge and would not be driven by the lodge itself. Thus, the traffic analysis assumes a conservative 10 percent increase in the daily visitation at the lodge over existing conditions. Additionally, for the proposed Project, there would be a minor change in travel routes for accessing the Schilling Lodge instead of the Existing Lodge, which would redistribute some of the vehicle trips in the Highlands neighborhood. Thus, similar to the Project-level noise analysis for the proposed Project and Alternative A in Impact 3.8-4, Project-generated traffic increases in the future cumulative scenario would not result in traffic noise that exceeds established local standards and would not be substantial such that when combined with cumulative projects such as the Dollar Creek Crossing project a significant cumulative impact would result. Therefore, the contribution from the proposed Project or Alternative A **would not be cumulatively considerable**.

2.1.11 Revisions to Section 3.9 Geology, Soils, Land Capability, and Coverage

In response to a comment on the Draft EIR, the "Land Capability and Coverage" section is revised to clarify that the SEZ areas found within the proposed Project site are associated with Lake Forest Creek. The third paragraph on page 3.9-8 of the Draft EIR is revised as follows:

These parcels are predominately mapped as LCD 5 (which allows up to 25 percent coverage) and LCD 6 (which allows up to 30 percent land coverage); however, the Alternative A site contains approximately 6,021 sq. ft. of LCD 1b (allowing only 1 percent land coverage), in the SEZ area adjacent to Lake Forest Creek.

In response to comments and to clarify potential cumulative impacts of the Dollar Creek Crossing project, the second and third paragraphs on page 3.9-15 in Section 3.9, "Geology, Soils, Land Capability, and Coverage," of the Draft EIR are revised as follows:

The proposed Project, Alternative A, and many of the cumulative projects, including the Dollar Creek Crossing project, would create additional land coverage within the cumulative analysis area. However, all projects within the Tahoe Basin would be required to comply with TRPA land coverage regulations. In cases where excess coverage is permitted (such as within Town Centers or for linear public facilities, public health and safety facilities, or water quality control facilities), all coverage exceeding the base allowable would be purchased and transferred from within hydrologically connected areas or retired from sensitive lands. In addition, all land coverage within LCD 1b must be mitigated at a ratio of 1.5 acres of restoration for every 1 acre of disturbance (TRPA Code Section 30.5.3).

The proposed Project, Alternative A, and the cumulative projects, including the Dollar Creek Crossing project, would result in grading and excavation, and soil disturbances that could cause erosion. However, all construction projects in the Tahoe Region must meet requirements and regulations of the TRPA, Lahontan RWQCB, Placer County, and federal, other state, and local agencies. The TRPA Code restricts grading, excavation, and alteration of natural topography (TRPA Code Chapter 33). In addition, all construction projects located in California with greater than one acre of disturbance are required, by Lahontan RWQCB, to submit an NPDES permit which includes the preparation of a SWPPP that includes site-specific construction site monitoring and reporting. Project SWPPPs are required to describe the site, construction activities, proposed erosion and sediment controls, means of waste disposal, maintenance requirements for temporary BMPs, and management controls unrelated to stormwater. Temporary BMPs to prevent erosion and protect water quality would be required during all site development activities, must be consistent with TRPA requirements, and would be required to ensure that runoff quality meets or surpasses TRPA, state, and federal water quality objectives and discharge limits. The Dollar Creek Crossing project would be required to comply with the requirements and regulations of the agencies listed above, including TRPA land coverage regulations, and would be required to prepare and implement a SWPPP. Compliance with these regulations and implementation of BMPs as part of the SWPPP would reduce potential erosion and water quality impacts to a less-than-significant level and the project would not combine with other projects to result in a significant cumulative impact.

2.1.12 Revisions to Section 3.10 Hydrology and Water Quality

In response to comments and to clarify potential cumulative impacts of the Dollar Creek Crossing project, the third full paragraph on page 3.10-16 in Section 3.10, "Hydrology and Water Quality," of the Draft EIR is revised as follows:

The proposed Project, Alternative A, and the cumulative projects, including the Dollar Creek Crossing project, through construction-related disturbance and increases in land coverage, have the potential to increase the volume of stormwater runoff, thereby increasing the concentrations of fine sediment particles, nutrients, and other pollutants in the surface and groundwaters of the Lake Tahoe Basin. Improper use of fertilizers and snow storage in unprotected areas or in close proximity to SEZs can also introduce pollutants into surface and groundwaters. These potential effects are controlled through compliance with a suite of protective regulations. Any project exceeding one acre in size, which would include the Dollar Creek Crossing project, is required to develop a SWPPP that identifies water quality controls that are consistent with Lahontan RWQCB and TRPA regulations. The SWPPP must include construction site BMPs, a spill prevention plan, and daily inspection and maintenance of temporary BMPs, and post construction BMPs to protect water quality during the life of the Project. In addition, TRPA requires all projects to include permanent water quality BMPs that control sources of sediment and urban pollutants. Any project with a landscape or vegetation component must develop a fertilizer management plan and snow storage areas must be located away from SEZs and equipped with any necessary BMPs. Additionally, because retrofitting existing development with water quality BMPs has been difficult to enforce, water quality improvements are often seen through new development or redevelopment processes where these BMPs are required as a condition of permit approval. TRPA also requires that each project be designed to infiltrate the 20-year, 1-hour design storm event. In special circumstances where this is not feasible, the Project must provide documentation that its stormwater is fully infiltrated by an offsite facility (TRPA Code Section 60.4). Because of the strong protective water quality regulations within the Tahoe region, the potential effects of the proposed Project, Alternative A, and other cumulative projects, including the Dollar Creek Crossing project, would be reduced such that the proposed Project and Alternative A **would not contribute** to the existing adverse cumulative water quality condition.

2.1.13 Revisions to Section 3.11 Utilities

In response to comments on the Draft EIR, Impact 3.11-3 is revised to clarify use of a generator at the Schilling Lodge in the event of power outages. The last paragraph on page 3.11-16 in the Draft EIR is revised to read as follows:

Liberty Utilities and Southwest Gas have indicated there would be adequate supplies and facilities to serve the Project (Custer, pers. comm., 2019; Nelson, pers. comm., 2019). Additionally, before receiving permit approval from TRPA or Placer County, future development would be required to comply with Section 32.6 of the TRPA Code, which requires that a project applicant demonstrate that the project would be served by facilities that have adequate electrical supply. Aside from a new service connection to the new building, no other new electricity or natural gas systems or substantial alterations to energy systems would be required. The new service connections would be constructed within the footprint of the proposed Project site and, thus, the potential environmental effects associated with construction of these service connections are considered as part the analysis of this proposed Project throughout this EIR. The Schilling Lodge would include an approximately 40-horsepower generator that could be used in the event of a power outage. Installation of a generator would occur in compliance with all applicable Placer County or Placer County Air Pollution Control District permits and approvals that would be determined at the time that time the Project submits an application with the County.

2.1.14 Revisions to Section 3.12 Energy

In response to comments on the Draft EIR, Impact 3.12-1 is revised to clarify use of a generator at the Schilling Lodge in the event of power outages. The fourth paragraph on page 3.12-7 in Section 3.12, "Energy," in the Draft EIR is revised to read as follows:

Operation of the proposed Project would be typical of nonresidential land uses requiring electricity and natural gas for lighting, space and water heating, appliances, ~~and~~ landscape maintenance activities, and the periodic use of a 40-horsepower generator during power outages. Indirect energy use would include wastewater treatment and solid waste removal at offsite facilities. The proposed Project would increase electricity and natural gas consumption relative to existing conditions, and would require the construction of new utility connections to existing electrical and natural gas facilities supplied by Liberty Utilities and Southwest Gas, respectively. The analysis of energy use also includes the continued operation of the Existing Lodge with some community meetings and recreation classes.

2.1.15 Revisions to Chapter 4 Alternatives

To rectify discrepancies regarding the number of existing parking spaces shown in Table 2-2 in Chapter 2, "Proposed Project and Project Alternatives," and Table 4-1, the table on page 4-7 of the Draft EIR is revised to read as follows:

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 ¹	10,154 sq. ft.	10,154 sq. ft.	2,723 sq. ft. ²	8,661 sq. ft. ³	6,229 sq. ft.
Parking	100 total parking spaces (59,799 sq. ft.)	100 total parking spaces (49,446 sq. ft.)	4651 total spaces ⁴ (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.

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	
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 ⁴⁵	79 ⁴⁵	0	152 ⁵⁶	<183 ⁵⁶
	Trees > 30 inches dbh	15 ⁴⁵	7 ⁴⁵	0	4 ⁶⁷	9 ⁶⁷
New Land Coverage ⁹¹⁰	81,593 sq. ft. ⁷⁸	67,619 sq. ft. ⁸⁹	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. cut/ 1,723 cu. yd. fill	NA	2,950 cu. yd. cut/ 1,425 cu. yd. fill	3,360 cu. yd. cut/ 1,082 cu. yd. fill	

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

¹ 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.

² 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.

³ This includes the size of the Schilling Lodge combined with the size of the Existing Lodge.

⁴ During the parking surveys conducted for the Transportation Impact Analysis (see Appendix D), 51 cars were observed to be parked in the parking lot.

⁴⁵ Estimate obtained from tree survey data provided by TTCSEA in 2020.

⁵⁶ 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.

⁶⁷ Estimate derived by Ascent Environmental in 2020 based on a review of tree survey data provided by TTCSEA.

⁷⁸ 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."

⁸⁹ 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."

⁹¹⁰ 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

To clarify the size of the footprint for the Site D – Reduced Project alternative, the first paragraph under Section 4.6, "Site D – Reduced Project," is revised as follows:

The Site D – Reduced Project alternative would ~~occupy the same footprint as the proposed Project (Site D – Full Project), but there would be include~~ 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.

3 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on July 24, 2020. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

3.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 3-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

Table 3-1 List of Commenters

Letter No.	Commenter	Date
AGENCIES		
A1	U.S. Army Corps of Engineers, Sacramento District, Reno Regulatory Field Office Jennifer C. Thomason, Senior Project Manager	July 6, 2020
A2	Placer County Leigh Chavez, Principal Planner/Environmental Coordinator	July 24, 2020
A3	Placer County Air Pollution Control District Ann Hobbs, Associate Planner	July 24, 2020
ORGANIZATIONS		
O1	League to Save Lake Tahoe Gavin Feiger, Senior Land Use Policy Analyst	July 6, 2020
INDIVIDUALS		
I1	Roger Huff	June 5, 2020
I2	Marguerite Sprague	June 8, 2020
I3	Joe Hennessey	June 8, 2020
I4	Alex Lesser	June 9, 2020
I5	Roger Huff	June 10, 2020
I6	Roger Huff	June 11, 2020
I7	Roger Huff	June 12, 2020
I8	Bonnie Dodge	June 13, 2020
I9	Roger Huff	June 15, 2020
I10	Alex Lesser	June 23, 2020
I11	Roland and Cheryl Stewart	June 23, 2020
I12	William Sharbrough	June 23, 2020
I13	Sharon Buss	June 26, 2020
I14	Rick Ganong	June 27, 2020
I15	Debbie Kelly-Hogan	June 29, 2020
I16	David Schwisow	July 2, 2020
I17	Peter Werbel	July 3, 2020
I18	Patti and Michael Dowden	July 4, 2020

Letter No.	Commenter	Date
I19	Jan Ganong	July 5, 2020
I20	Vicki and Roger Kahn	July 7, 2020
I21	Roger Huff	July 8, 2020
I22	Tom Oneill	July 9, 2020
I23	Travis Ganong	July 9, 2020
I24	Mark Boitano	July 10, 2020
I25	Roger and Janet Huff	July 12, 2020
I26	Ted Gomoll	July 13, 2020
I27	Julie Maurer	July 13, 2020
I28	Michael Hogan	July 14, 2020
I29	Robert and Cindy Owens	July 14, 2020
I30	Randy and Barbara Thomas	July 14, 2020
I31	Dave Wilderotter	July 14, 2020
I32	Carol Pollock	July 17, 2020
I33	Monica Grigoleit	July 15, 2020
I34	John Pang	July 15, 2020
I35	Douglas Gourlay	July 17, 2020
I36	Douglas Gourlay	July 17, 2020
I37	Kay and Dave Gleske	July 17, 2020
I38	Carol Pollock	July 17, 2020
I39	Bonnie Dodge	July 17, 2020
I40	Linda May	July 17, 2020
I41	Roger and Janet Huff	July 18, 2020
I42	Eric and Nanette Poulsen	July 19, 2020
I43	Jim Phelan	July 19, 2020
I44	John Gerbino	July 19, 2020
I45	Tracy Owen Chapman	July 19, 2020
I46	Gerald Rockwell	July 20, 2020
I47	Douglas Gourlay	July 20, 2020
I48	Tom and Kristen Lane	July 20, 2020
I49	Roger Huff	July 21, 2020
I50	Marguerite Sprague	July 21, 2020
I51	Donald Fyfe	July 21, 2020
I52	Heather and John Segale	July 21, 2020
I53	Robert (Bob) Duffield	July 21, 2020
I54	Kevin Drake	July 21, 2020
I55	Dan Haas	July 22, 2020
I56	John and Leslie Hyche	July 22, 2020
I57	Genevieve Evans	July 22, 2020

Letter No.	Commenter	Date
I58	Mike Schwartz	July 22, 2020
I59	Roger Huff	July 23, 2020
I60	Joy M. Doyle	July 23, 2020
I61	Rick Wertheim and Lin Winetrub	July 23, 2020
I62	Renee Kojjane	July 23, 2020
I63	Scott Schroepfer	July 23, 2020
I64	Debbie White and Paul Niwano	July 23, 2020
I65	Robert and Darlene Boggeri	July 24, 2020
I66	Jackie Clark	July 24, 2020
I67	Meghan Robins	July 24, 2020
I68	Greg Mihevc	July 24, 2020
I69	Jennifer and Dan Stoll	July 24, 2020
I70	Will Stelter	July 24, 2020
I71	Jeffery D. Harris	July 24, 2020
I72	Stephanie Schwartz	July 24, 2020
I73	Linda Williams	July 24, 2020
I74	Julie Barnett	July 24, 2020
I75	Alexandra Schilling Santos	July 24, 2020
I76	Carol Pollock	July 24, 2020
PUBLIC MEETING		
PM1	Comment Summary Notes from the TCPUD Board Meeting	July 17, 2020

3.2 MASTER RESPONSE

Several comments raised similar issues related to transportation and safety; therefore, a master response has been developed to address the comments comprehensively. This master response is provided for transportation safety, and a reference to the master response is provided, where relevant, in responses to the individual comments.

3.2.1 Master Response 1: Transportation Safety

The *Tahoe XC Lodge Project Transportation Analysis* (Transportation Analysis) prepared by LSC Transportation Consultants, Inc. (LSC) and included as Appendix D of the Draft EIR contains detailed analysis of additional transportation factors that could create safer or less safe transportation conditions. The analysis considered the following additional safety factors:

- ▶ speed surveys,
- ▶ historical crash data,
- ▶ proposed driveway spacing,
- ▶ driver sight distance conditions,
- ▶ bicycle and pedestrian conditions, and
- ▶ impact on school access conditions.

BICYCLE AND PEDESTRIAN SAFETY

Multiple comments were received regarding bicycle and pedestrian safety due to the addition of project-generated vehicular traffic along the roadways in the Project area. Section 3.5, "Transportation," acknowledges that the Project would increase traffic volumes along roadways in the vicinity of the Project site and that there are no dedicated existing pedestrian or bicycle facilities along Project area roadways. However, increased traffic along a roadway lacking pedestrian or bicycle facilities does not necessarily constitute a safety impact under CEQA. Additionally, the highest volume of project-generated traffic added to the surrounding roadway network would occur during winter weekends and the summer when school is not in session and general neighborhood activity is lower.

Although increased vehicular traffic along roadways and intersections lacking pedestrian or bicycle facilities generally increases the potential for conflicts between vehicles and bicyclists/pedestrians, no numerical adopted standards exist to define what would constitute a significant impact on transportation safety in most situations. As detailed on pages 3.5-18 and 3.5-19 of Section 3.5, "Transportation," of the Draft EIR, the criteria from the TRPA Initial Environmental Checklist were used to evaluate the bicycle and pedestrian safety impacts of the Project. The TRPA criteria applied consist of determining whether the Project would (1) substantially increases traffic hazards to bicyclists and pedestrians; or (2) substantially impacts existing bicycle/pedestrian facilities.

As detailed in the analysis contained within the Transportation Analysis (Appendix D of the Draft EIR), over the 10-year period evaluated there were three collisions on neighborhood roadways that involved a bicyclist or pedestrian (two collisions occurred on Polaris Road and one on Fabian Way). Although all three collisions resulted in injuries, no fatalities or severe injuries were reported. Additionally, all three incidents involving a bicycle or pedestrian occurred on days when school was not in session. Collision rates along Polaris Road, Old Mill Road, and Village Road exceed the average rates on similar facilities. However, the average collision rates are based on roadways with higher traffic volumes than the roadways analyzed in the Transportation Analysis and Draft EIR; thus, due to the relatively low traffic volumes along the Project area roadways each reported crash dramatically affects the calculated crash rates. Additionally, as discussed below, increasing traffic at locations exceeding the statewide average is not necessarily a significant impact.

The proposed Project would increase daily traffic along Polaris Road and Old Mill Road, while reducing traffic on Village Road north of Polaris Road. Based on the analysis contained within the Transportation Analysis, the proposed Project would increase the total two-way volume on Polaris Road near the high school by approximately 17 percent in the a.m. and p.m. peak hours of school traffic activity. Winter weekend volumes with the addition of the proposed Project would be substantially lower than existing weekday volumes, which include traffic generated by school traffic, along this roadway segment. As detailed in the analysis contained within Section 7 of the Transportation Analysis, up to eight bicyclists and 25 pedestrians per hour were observed on Polaris Road east of the high school during school-related peak periods in September 2018. The maximum hourly volumes observed on Village Road south of Polaris Road were eleven bicyclists and five pedestrians. Twenty pedestrians and two bicyclists were observed using Old Mill Road south of Polaris Road. The increase in vehicular traffic generated by the proposed Project would occur along roadways with adequate width, appropriate prevailing speeds, and sufficient sight distance for drivers traveling along the roadways to allow traffic, bicycles, and pedestrians to share the roadway with an adequate level of safety, so long as the final driveway intersection design provides adequate driver sight distance (see below for a more detailed discussion related to sight distance).

As detailed in the analysis contained within the Transportation Analysis, implementation of Alternative A would increase traffic volumes along Village Road and Country Club Drive, but traffic levels on the other neighborhood roadways are not be expected to be affected. Alternative A would also reduce pedestrian activity on the northern segment of Village Road and on Country Club Drive by reducing the need for street parking through the provision of adequate on-site parking. The Project-generated increase in vehicular traffic would occur along roadways with adequate width to allow traffic, bicycles, and pedestrians to share the roadway with an adequate level of safety, so long as the existing corner sight distance deficiency at the Alternative A project site is addressed (see below for a more detailed discussion related to sight distance).

Based on the analysis in the Transportation Analysis described above, and as presented in Section 7, "Transportation Safety Analysis," of the Transportation Analysis, it was determined that there is no existing bicycle or pedestrian hazards

along neighborhood roadways that are expected to be exacerbated as a result of implementation of the Project. Therefore, Project-generated vehicular traffic along roadways in the Project area would not substantially increase traffic hazards to bicyclists and pedestrians, or substantially impact existing bicycle/pedestrian facilities. Finally, multiple comments were received regarding roadway safety related to the addition of the Dollar Creek Crossing project in the cumulative context. As detailed on page 3.5-32 in the cumulative analysis portion of Section 3.5, "Transportation," of the Draft EIR, the Dollar Creek Crossing project was included in the future cumulative background traffic volumes used in the cumulative transportation analysis. As described above, increasing traffic along a roadway lacking pedestrian or bicycle facilities does not necessarily constitute a safety impact under CEQA. Additionally, as detailed above, the Transportation Analysis prepared by LSC did not identify any roadway safety impacts. Therefore, no undue transportation safety-related concerns related to the addition of cumulative traffic are expected to result with implementation of the proposed Project.

ROADWAY DESIGN AND HAZARDS

Design

Multiple comments were received regarding safety along Old Mill Road specific to any new driveways associated with the proposed Project. Impact 3.5-3 on page 3.5-23 of Section 3.5, "Transportation," in the Draft EIR addresses sight distance as it relates to hazards due to a design feature. As described on page 3.5-23 of the Draft EIR, the Placer County corner sight distance standards indicate that where restrictive conditions do not allow compliance with the specified sight distance requirements, a reduction of the corner sight distance to no less than the minimum stopping sight distance as outlined in the Caltrans Highway Design Manual may be approved by Placer County (Placer County 2016). In coordination with Placer County staff in preparation of this Final EIR, and based on the restrictive conditions along Polaris Road and Country Club Drive (i.e., horizontal curvature, existing embankments, existing vegetation) it was determined that a Design Exception allowing for minimum stopping sight distance would be appropriate for the proposed Project and Alternative A (Placer County et al. 2020). The proposed Project and Alternative A driveways would meet the Caltrans Highway Design Manual minimum stopping sight distance requirement for 35 mph and 25 mph, respectively (Placer County et al. 2020). The applicant team will continue to work with County staff as it relates to the aforementioned Design Exception, which would occur during the Placer County design review and plan check processes. Additionally, as detailed therein, it was determined that this impact would be less than significant because the Project would be required to demonstrate compliance with all applicable Placer County design and safety standards for Project-related roadway improvements or changes to existing Placer County roadways during Project design and permitting and prior to construction. For additional information, please see Section 7, "Transportation Safety Analysis," of the Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR.

Polaris Road and Old Mill Road Transportation Hazards

Multiple comments were received regarding safety along Polaris Road and along Old Mill Road specific to winter conditions and topography. As detailed above, the Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and review and analysis of historical crash data from 2008-2017 (the most recent 10-year period available at the time the analysis was prepared) available through the Statewide Integrated Traffic Records System.

Polaris Road

The historical crash data contains data for Polaris Road, which includes the winter months. Of the five crashes reported on Polaris Road within 200 feet of the intersections (three at the intersection with Heather Lane and two at the intersection with the high school parking lot), three occurred during clear/cloudy days and information on weather conditions was not provided for the other two. Additionally, as indicated in Table 16 of the Transportation Analysis, all crashes reported along Polaris Road at locations greater than 200 feet from intersections (i.e., three total crashes) occurred during clear/cloudy days. Therefore, based on the analysis presented in the Section 7, "Transportation Safety Analysis," of the Transportation Analysis and summarized above there are no undue transportation safety-related concerns related to winter conditions along Polaris Road.

Old Mill Road

It is acknowledged that traffic increases on Old Mill Road are a particular concern given the steep grades and curves.

The historical crash data includes the winter months during which two of the four crashes reported on Old Mill Road within 200 feet of the intersection with Polaris Road occurred while it was snowing, one crash occurred during clear/cloudy conditions, and information on weather conditions was not provided for the fourth crash. As indicated in Table 16 of the Transportation Analysis, all crashes reported along Old Mill Road (during the 10-year period analyzed and including crashes located more than 200 feet from the intersection with Polaris Road) resulted in property damage only, no injuries were reported, and no crashes involving pedestrians or bicyclists were reported. This indicates the crash severity on Old Mill Road has been relatively low. Additionally, the Tahoe Regional Planning Agency's (TRPA's) *Lake Tahoe Region Safety Strategy* study, which evaluated 2,672 reported crashes over a 5-year period across the Tahoe region, did not identify Old Mill Road as a priority location for safety improvements. Finally, although the proposed Project would increase traffic on Old Mill Road, the resulting daily traffic volumes would not exceed the County standards for traffic volumes on a residential street. Therefore, based on the analysis presented in the Section 7, "Transportation Safety Analysis," of the Transportation Analysis and summarized above it was determined that no undue transportation safety-related concerns related to conditions along Old Mill Road would result with implementation of the proposed Project.

Transportation Hazards at Intersection of State Route 28 and Fabian Way

The Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and review and analysis of historical crash data from 2008-2017 (the most recent 10-year period available at the time the analysis was prepared) available through the Statewide Integrated Traffic Records System. Historical crash data at the SR 28/Fabian Way intersection over the 10-year period from 2008-2017 indicates the following:

- ▶ approximately 1 crash per year, on average;
- ▶ approximately 1 injury crash every 1 to 2 years, on average;
- ▶ approximately 1 crash involving a bicyclist or pedestrian every 5 years, on average;
- ▶ no severe injuries reported; and
- ▶ no fatalities reported.

As detailed above, increasing traffic at intersections exceeding the statewide average crash rate does not necessarily constitute a significant impact under CEQA and no numerical adopted standards exist to define significant impact on transportation safety in most situations. As detailed on pages 3.5-18 and 3.5-19 of Section 3.5, "Transportation," of the Draft EIR, the criteria from TRPA Initial Environmental Checklist were used to evaluate the transportation hazards of the Project. The TRPA criteria applied in the analysis under Impact 3.5-3 beginning on page 3.5-23 of the Draft EIR included determining whether the Project would substantially increase hazards due to a design feature or incompatible use.

The SR 28/Fabian Way intersection has "total" and injury crash rates that are more than double the statewide average rates. It is important to note that the statewide average crash rates are derived based on intersections along State highways only, and the vast majority of traffic activity along highways in California occurs in areas unaffected by snowy and icy conditions. It can be expected that crash rates would be higher in the Sierra Nevada mountains and this is reflected in that half of the crashes at this intersection occurred under snowy and/or icy roadway conditions. The relatively high observed crash rates may also reflect the limited driver experience level of high school students' traveling to and from the nearby high school.

The proposed Project would increase total traffic traveling through the SR 28/Fabian Way intersection by less than 3 percent during winter peak periods and by approximately 1 percent during summer peak periods. Alternative A would increase total traffic traveling through the SR 28/Fabian Way intersection by up to about 5 percent during winter and summer peak periods. Additionally, if the Dollar Creek Crossing project is implemented, it is estimated that total traffic traveling through this intersection would increase by up to 10 percent in winter and 7 percent in summer (assuming 169 new housing units; see responses to comments I71-2 and I71-3 for further discussion of the

cumulative traffic impacts associated with the Dollar Creek Crossing project). Combined, both projects could result in a cumulative increase in traffic volumes traveling through the SR 28/Fabian Way intersection by approximately 13 to 15 percent during winter peak periods and 8 to 12 percent in summer peak periods (depending on if the proposed Project or Alternative A is selected).

Based on the analysis in the Transportation Analysis described above, and as presented in Section 7, "Transportation Safety Analysis," of the Transportation Analysis, it was determined that the proposed Project and Alternative A, in the existing and cumulative scenarios, are not expected to exacerbate any existing roadway hazards due to the increase in traffic volumes using the SR 28/Fabian Way intersection. Additionally, the Project would not require the construction, re-design, or alteration of the SR 28/Fabian Way intersection. Additionally, the types of vehicles anticipated to be traveling to and from the Project would be consistent with the existing types of vehicles currently using the study area roadway network. Therefore, it was determined within the Draft EIR that the Project would not substantially increase hazards due to a design feature or incompatible use.

SPEEDING

Multiple comments were received regarding safety along study area roadways specific to motorists speeding. As described on page 3.5-10 of the Draft EIR and in the Transportation Impact Analysis prepared by LSC included in Appendix D of the Draft EIR, the average speed at a point east of the high school along Polaris Road is approximately 26 mph (average of both directions), and the 85th-percentile speed (the speed that is only exceeded by 15 percent of the vehicles) is calculated to be approximately 30 mph. Placer County also indicates that the design speed for the roadway is 35 mph. As the majority (85 percent) of speeds recorded on Polaris Road are no more than 5 mph over the posted speed limit and are within the design speed, this would not typically be identified as an existing safety issue related to speeding. Additionally, the average speed (26 mph) and 85th-percentile speed (30 mph) are both lower than the Placer County design speed for Polaris Road of 35 mph. The average observed speed along Country Club Drive was 18 mph, and the 85th-percentile speed (20 mph) is about 5 mph below the speed limit, which indicates that there is no safety issue related to speed along this roadway.

As detailed in the Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR, "unsafe speed" was not recorded as a factor in any of the three crashes reported during the 10-year period along Polaris Road. Additionally, the *Lake Tahoe Region Safety Strategy* study, which evaluated location of 2,672 reported crashes over a 5-year period across the Tahoe Region, did not identify any of the study area roadways or intersections as priority locations for safety improvements (TRPA 2019). Further, the applicant would participate and partner in a Neighborhood Traffic Management Program (NTMP) for the affected area. As detailed on page 3.5-6 of the Draft EIR and consistent with recommendations within the NTMP, the applicant would coordinate with County staff during the development review process regarding program participation and the appropriate traffic calming measures that could potentially be incorporated into their development plan.

Finally, speeding is prohibited by law along these roadways; thus, it is a reasonable assumption that drivers would obey existing speed regulations and traffic laws when arriving or departing from the Project site. Enforcement of speed limits and associated laws is carried out by local law enforcement, and risk of violating laws is not a topic subject to CEQA review.

3.3 COMMENTS AND RESPONSES

The oral and written individual comments received on the Draft EIR and the responses to those comments are provided below. The comment letters are reproduced in their entirety and are followed by the response(s). A summary of each oral comment made at the public hearing is provided and is followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

3.3.1 Agencies

Letter
A1

From: Thomason, Jennifer C CIV USARMY CESPK (USA)
To: Kim Boyd
Subject: Tahoe XC Draft EIR (UNCLASSIFIED)
Date: Monday, July 06, 2020 9:26:22 AM

CLASSIFICATION: UNCLASSIFIED

Please be advised that the U.S. Army Corps of Engineers, through the Regulatory Program, administers and enforces Section 10 of the Rivers and Harbors Act of 1899 (RHA) and Section 404 of the Clean Water Act (CWA). Under RHA Section 10, a permit is required for work or structures in, over or under navigable waters of the United States. Lake Tahoe is regulated under RHA Section 10. Under CWA Section 404, a permit is required for the discharge of dredged or fill material into waters of the United States. If this project will place fill material below the ordinary high water mark of a regulated water, including Lake Tahoe, its tributaries and adjacent wetlands, a permit may be required from this office. More information regarding our regulatory program is available on our website at, <http://www.spk.usace.army.mil/Missions/Regulatory.aspx>.

A1-1

Please let me know if you have any questions.

Thank you,

Jennifer C. Thomason
Senior Project Manager
US Army Corps of Engineers, Sacramento District
Reno Regulatory Field Office
300 Booth Street, Room 3050
Reno, NV 89509-1361
Office: (775) 784-5304
Mobile: (775) 525-0384

In response to COVID-19, Regulatory Division staff are teleworking from home or other approved location. We will do our best to administer the Regulatory Program in an effective and efficient manner. Priority will be given to health and safety activities and essential infrastructure. Action on your permit application or other request may be delayed during this emergency. We appreciate your patience over the next several weeks.

Please note: The out of office notification for our email has been disabled. If I do not respond to your message in a few days, I may be out of the office and I will respond as soon as I am able.

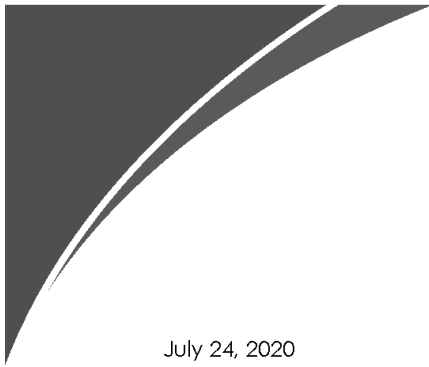
Let us know how we're doing. Please complete the survey at:
http://corpsmapu.usace.army.mil/cm_apex/?p=regulatory_survey

CLASSIFICATION: UNCLASSIFIED

Letter A1 Jennifer C. Thomason, Senior Project Manager
U.S. Army Corps of Engineers, Sacramento District, Reno Regulatory Field Office
July 6, 2020

Response A1-1

This comment advises that compliance with the Clean Water Act (CWA) is required for all projects. The Clean Water Act is discussed on page 3.10-1 in Section 3.10, "Hydrology and Water Quality," of the Draft EIR. There are no wetlands or other regulated water bodies on the Project site. Therefore, the Project would not place fill material below the high water mark of a regulated water and a Section 404 would not be required from the U.S. Army Corps of Engineers. No further response is necessary.



July 24, 2020

Tahoe City Public Utility District
Attn: Kim Boyd, Senior Management Analyst
PO Box 5249
Tahoe City, CA 96145

via email: kboyd@tcpud.org

Subject: Tahoe Cross-Country Lodge Replacement and Expansion Project Draft Environmental Impact Report

Dear Ms. Boyd:

Placer County appreciates the opportunity to engage at this stage in the process. After reviewing the submitted information, the County offers the following comments for your consideration regarding the proposed project: A2-1

Engineering & Surveying Division and Department of Public Works

1. The Transportation section should include a discussion of the impacts resulting from the potentially required Placer County frontage improvements. The Tahoe Basin Area Plan requires projects to construct improvements where they front County maintained roads. The improvement along the parcel frontage with Polaris Road would include the construction/reconstruction of a 16 foot paved section from the existing centerline to a Traffic Index of 6.0 plus curb, gutter, and a 6 foot wide sidewalk. The improvements along the parcel frontage with Country Club Drive would include the construction/reconstruction of an 11 foot paved section from the existing centerline to a Traffic Index of 6.0 plus curb, gutter, and a 6 foot wide sidewalk. A2-2

2. Based on the traffic analysis and the potential for additional projects in the vicinity of the project, the County remains concerned about the use of and potential traffic impacts on neighborhood streets. The applicant is strongly encouraged to coordinate with the County early on in the development process to address these concerns through coordination on the Transportation Demand Management (TDM) Plan and the applicant's participation and partnership in a Neighborhood Traffic Management Program (NTMP) for the affected area. A2-3

3. The Transportation section should include a discussion and the inclusion of the Tahoe Basin Area Plan Mitigation Measure 10-1b and 10-5 as a part of the project. A2-4

4. Impact 3.5-3, Proposed Project: This impact discusses the sight distance requirements along Polaris Road. The Placer County required design speed for Polaris Road is 35 mph. The environmental analysis should be based on the County design speed requirement of 35 mph. A2-5

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(530) 745-3000 office • (530) 745-3080 fax • planning@placer.ca.gov





In addition, the County requirement is to meet corner sight distance. The project indicates that a Minor Use permit is required. A Condition of Approval will be placed on the project to meet the corner sight distance requirements for a 35 mph design speed. If this sight distance is not achievable, the applicant should work with the County prior to the release of the Final EIR to determine if a Design Exception could be approved for a reduced sight distance. If the Design Exception for a reduced sight distance is not acceptable, the Final EIR should identify what mitigation measures would be needed to reduce the sight distance impacts.

- 5. Impact 3.5-3, Alternative A: This impact discusses the sight distance requirements along Polaris Road. The Placer County required design speed for Country Club Drive is 25 mph. As discussed above for Polaris Road, the County requirement is to meet corner sight distance. The project indicates that a Minor Use permit is required. A Condition of Approval will be placed on the project to meet the corner sight distance requirements for a 25 mph design speed. If this sight distance is not achievable, the applicant should work with the County prior to the release of the Final EIR release to determine if a Design Exception could be approved for a reduced sight distance. If the Design Exception for a reduced sight distance is not acceptable, the Final EIR should identify what mitigation measures would be needed to reduce the sight distance impacts (The DEIR indicates that the sight distance is limited by existing trees and vegetation. The Final EIR should indicate what trees and vegetation would need to be removed in order to achieve the required corner sight distance).

A2-5
cont.

- 6. A more comprehensive explanation of the proposed measures' effects on VMT for Mitigation Measure 3.5-6a should be provided. The effects of the measures should be described in a more quantitative manner to show how much each could reduce VMT and how these, in combination, would reduce the impact to a less than significant level.

A2-6

Thank you again for the opportunity to comment on the Draft Environmental Impact Report for the TCPUD Tahoe Cross-Country Lodge Replacement and Expansion project.

Should you have any questions, please contact Leigh Chavez, Environmental Coordinator at lchavez@placer.ca.gov or 530-745-3077.

Sincerely,


 LEIGH CHAVEZ, PRINCIPAL PLANNER
 ENVIRONMENTAL COORDINATOR



Letter A2 Leigh Chavez, Principal Planner/Environmental Coordinator
Placer County
July 24, 2020

Response A2-1

The comment provides an introduction to the letter and no response is necessary.

Response A2-2

The comment states that Section 3.5, "Transportation," of the Draft EIR should include a discussion of the impacts resulting from the potentially required Placer County roadway frontage improvements along the parcel frontage along Polaris Road and Country Club Drive.

In response to this comment, the description of the proposed Project is refined to more clearly define the Project and the roadway frontage improvements that would be required as part of the Project. This clarification to the Project description in the Draft EIR is presented below and in Chapter 2, "Revisions to the Draft EIR." Additionally, a summary that clarifies the potential impacts of these roadway improvements is provided below.

A new paragraph is added after the third full paragraph ("Parking" section) under Section 2.5.1, "Project Characteristics," on page 2-11 of the Draft EIR as follows:

ROADWAY IMPROVEMENTS

As required by the Placer County Tahoe Basin Area Plan Implementing Regulations (Section 3.06), roadway improvements along the proposed Project site parcel frontage at Polaris Road or along the Alternative A site parcel frontage at Country Club Drive would be constructed consistent with the Placer County Design Standards and Guidelines. For the proposed Project, the improvement along the parcel frontage at Polaris Road would include the construction/reconstruction of a 16-foot paved section from the existing centerline to a Traffic Index of 6.0 plus curb, gutter, and a 6-foot wide sidewalk. Traffic Index is used to determine necessary pavement thickness. For Alternative A, the improvements along the parcel frontage at Country Club Drive would include the construction/reconstruction of an 11-foot paved section from the existing centerline to a Traffic Index of 6.0 plus curb, gutter, and a 6-foot wide sidewalk.

Impacts resulting from roadway frontage improvements required under the Placer County Tahoe Basin Area Plan (Area Plan) are included in the Draft EIR impact analysis. Impact 3.5-5 in Section 3.5, "Transportation," of the Draft EIR includes discussion and analysis of Project-generated construction impacts, including the construction of roadway frontage improvements required under the Area Plan. Construction of the roadway frontage improvements (i.e., curb, gutter, sidewalk, and reconstruction of a paved section from the existing center line to the edge of the driveway) would involve similar construction activities described in Section 2.5.2, "Construction Schedule and Activities," in Chapter 2 of the Draft EIR resulting in similar types of construction-related impacts that were described for the proposed Project and Alternative A in the Draft EIR. These roadway improvements would not result in any operational changes along either Polaris Road (for the proposed Project) or Country Club Drive (for Alternative A). The potential impacts associated with these roadway improvements are summarized here:

- ▶ **Biological Resources:** The roadway frontage improvements would include ground surface improvements that would have no permanent effects on biological resources. Because the improvements would occur within an existing paved roadway (i.e., Polaris Road or Country Club Drive) and within the Project site, they would not result in ground disturbance of any previously undisturbed areas and would not be anticipated to result in new or substantially more severe impacts to biological resources.
- ▶ **Transportation:** The roadway improvements would not result in any operational changes; thus, there would not be any long-term transportation impacts. Because the roadway improvements would be limited in scope to the frontage along the Project parcel that abuts Polaris Road (or Country Club Drive), construction-related transportation impacts would be similar to or less than those discussed for the proposed Project and

Alternative A under Impact 3.5-5. Preparation and implementation of a temporary traffic control plan for the proposed Project or Alternative A as identified in Mitigation Measure 3.5-5 would address maintaining access for residences and emergency vehicles during construction of the roadway improvements.

- ▶ Archaeological, Historical, and Tribal Cultural Resources: Potential construction-related impacts on archaeological, historical, and tribal cultural resources from construction of roadway improvements would be similar to those discussed for the proposed Project and Alternative A as discussed in Impacts 3.4-1 through 3.4-4 in Section 3.4, "Cultural, Historical, and Tribal Cultural Resources." These improvements would be required to implement Mitigation Measures 3.4-2 and 3.4-3, which would reduce potentially significant impacts related to previously undiscovered archaeological and tribal cultural resources because mitigation would avoid, move, record, or otherwise treat a discovered resource appropriately, in accordance with pertinent laws and regulations.
- ▶ Air Quality: Because of the limited amount of construction activities that would be associated with construction of the roadway improvements in Polaris Road or Country Club Drive involving ground disturbance and installation, construction-related emissions of criteria air pollutants or precursors would not exceed construction-related emissions of the proposed Project or Alternative A shown in Tables 3.6-4 and 3.6-5 on pages 3.6-14 and 3.6-15 of the Draft EIR and would not be anticipated to exceed the PCAPCD significance criteria for criteria pollutants and precursors. There would be no operational emissions of criteria air pollutants or precursors associated with the roadway improvements.
- ▶ Greenhouse Gases and Climate Change: Construction of the roadway improvements would result in emission of construction-related GHG emissions less than that described for the proposed Project and Alternative A under Impact 3.7-1. As identified in Impact 3.7-1, because the construction and operational GHG emissions from the proposed Project and Alternative A would not achieve the zero net emissions goal of the Area Plan or the Linking Tahoe RTP/SCS goal of reducing VMT within the region, the proposed Project and Alternative A would result in a potentially significant impact. Construction-related GHG emissions from the roadway improvements would contribute to this impact; thus, as a component of either the proposed Project or Alternative A, the roadway improvements would also be required to implement feasible measures to reduce GHGs identified in Mitigation Measure 3.7-1 (revised as Mitigation Measures 3.7-1a and 3.7-1b in response to comment A3-16 below), which could include enforcing idling time restrictions for construction vehicles and use of electric-powered construction equipment rather than operating temporary gasoline/diesel powered generators. The applicant would also be required to offset the remaining levels of unmitigated GHG emissions by purchasing carbon offsets as described in the mitigation measure. Construction-related GHG emissions from construction of the roadway improvements would be reduced to a less-than-significant level after implementation of Mitigation Measure 3.7-1 (revised as Mitigation Measures 3.7-1a and 3.7-1b in response to comment A3-16 below).
- ▶ Noise: Construction of the roadway improvements could result in similar noise and vibration impacts as described for the proposed Project and Alternative A under Impacts 3.8-1 and 3.8-2. Because construction activity for the roadway improvements would occur between 8:00 a.m. and 6:30 p.m. daily (during hours where construction activities are exempt from local noise standards) and be temporary in nature, existing nearby sensitive receptors would not be substantially affected by construction noise. Thus, construction of the roadway improvements would not result in a substantial temporary increase in noise that exceeds a local (i.e., TRPA, Placer County) noise standard and this impact would be less than significant.

Construction vibration impacts associated with the roadway improvements would be similar to the analysis of vibration impacts for the proposed Project and Alternative A described in Impact 3.8-2 because the roadway improvement construction activities would use similar construction equipment. The nearest residential structures are over 50 feet from the road centerline edge of pavement (i.e., edge of where construction activities could occur for these improvements) and would not be exposed to a vibration impact that could result in structural building damage. Additionally, construction activities would occur during daytime hours, when people are less sensitive; thus, existing residences would not be exposed to vibration levels that would disturb people.

- ▶ Geology, Soils, Land Capability, and Coverage and Hydrology and Water Quality: Construction of the roadway improvements would result in similar erosion impacts and surface water and groundwater quality impacts as those described for the proposed Project and Alternative A as described under Impacts 3.9-3, 3.10-1, and 3.10-3. Because the roadway improvements would occur in previously disturbed areas and would implement temporary and permanent best management practices, as required by TRPA, Lahontan Regional Water Quality Control Board, and Placer County, erosion impacts would be less than significant. Because these improvements would be located in previously disturbed and developed areas, they would not adversely affect the topography or result in compaction or land coverage beyond TRPA limits.
- ▶ Utilities: Construction of roadway improvements would not result in operational changes such that there would be demand for water, wastewater, natural gas, or electricity. Installation of the roadway improvements would involve limited excavation and construction and demolition (C&D) waste associated with asphalt removed during construction. The roadway improvements would comply with Section 5.408 of the CALGreen Code as discussed under Impact 3.11-4 for the proposed Project and Alternative A, which requires that a minimum of 65 percent of C&D debris generated during construction be recycled and/or salvaged. The roadway improvements would not result in an ongoing increase in demand for solid waste collection and disposal.
- ▶ Energy: Construction of the roadway improvements would result in the same types of fuel consumption, which would be a one-time energy expenditure, as described for the proposed Project and Alternative A under Impact 3.12-1. Implementation of Mitigation Measure 3.7-1 (revised as Mitigation Measures 3.7-1a and 3.7-1b in response to comment A3-16 below), as summarized above, would result in the reduction of GHG emissions through implementation of measures that would also reduce construction-related consumption of fuels. Because the demand for energy for construction activities would be temporary and would not require additional capacity or increased peak or base period demands for electricity or other forms of energy and because construction of the roadway improvements would implement measures to reduce fuel consumption, these improvements would not result in wasteful, inefficient, or unnecessary consumption of energy.

For the reasons described above, clarification in the Final EIR of these types of improvements that are required by Placer County and the Area Plan would not alter the conclusions with respect to the significance of any environmental impact.

Response A2-3

The comment expresses concern about potential traffic impacts on neighborhood streets surrounding the Project site. The comment encourages the applicant to coordinate with the County early on in the development process to address these concerns through coordination of the Transportation Demand Management (TDM) Plan and the applicant's participation and partnership in a Neighborhood Traffic Management Program (NTMP) for the affected area. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. However, as discussed in detail in response to comment A2-6 below, preparation of a TDM plan consistent with Area Plan Policy T-P-12 would be required as part of the development review process. Additionally, the implementation of a more robust version of the NTMP as it relates to traffic calming measures could be required as part of the TDM plan based on the fact that reducing motor vehicle speeds could improve safety, encourage pedestrian and bicycle trips; and thus, potentially reduce VMT. Further details and information related to potentially feasible TDM measures that could be implemented as part of the TDM plan, including a more detailed discussion of what an enhanced NTMP would entail, are shown in Appendix A to this Final EIR. Therefore, the applicant would coordinate with the County during the development process to address any applicable areas of concern. Additionally, as detailed on page 3.5-6 of the Draft EIR and consistent with recommendations within the NTMP, the applicant would coordinate with County staff during the development review process regarding program participation and the appropriate traffic calming measures that could be incorporated into their development plan. The comment is noted for consideration during the County development review and permitting process for the Project.

Response A2-4

The comment states that Section 3.5, "Transportation," of the Draft EIR should include a discussion and inclusion of Area Plan EIR/EIS Mitigation Measure 10-1b, "Establish a County Service Area Zone of Benefit to fund expansion of transit capacity," and Mitigation Measure 10-5, "Create a transit service expansion funding source pursuant to Mitigation Measure 10-1b," as part of the Project.

Consistent with Mitigation Measures 10-1b and 10-5 identified in the Area Plan EIR/EIS and codified in Policy T-P-31 of the Area Plan, the Project is required to develop a County Service Area Zone of Benefit as part of the development review process. Therefore, in response to this comment, Section 3.5, "Transportation," and Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," are revised in this Final EIR. These changes are presented below and in Chapter 2, "Revisions to the Draft EIR." The inclusion of these Area Plan EIR/EIS mitigation measures as part of the Project does not alter the conclusions with respect to the significance of any environmental impact because the development of County Service Area Zones of Benefit and payment of all applicable fees would be required as part of the development review process. Additionally, these requirements for the Project would provide additional benefits related to supporting the use of transit, which could help minimize transportation-related and other environmental effects (e.g., air quality, GHG).

Revisions are made to page 3.5-4 of the Draft EIR as follows:

The environmental document prepared for the Area Plan (i.e., ~~the Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project EIR/EIS~~ [Area Plan EIR/EIS]) identified plan-level mitigation that would apply to all new construction located within the Area Plan boundaries. Placer County and TRPA developed mitigation measures to address transportation impacts of the Area Plan. Mitigation Measures ~~10-1b, 10-1c, and 10-1d, and 10-5~~ are shown below, ~~and~~ would apply to the Project, ~~and would be implemented during the Placer County development review process, which is described in Section 2.5.2, "Placer County Tahoe Basin Area Plan Mitigation Measures," in Chapter 2, "Proposed Project and Alternative Evaluated in Detail" (Placer County and TRPA 2016):~~

Mitigation Measure 10-1b: Establish a County Service Area Zone of Benefit to fund expansion of transit capacity

The key constraint to expanding transit capacity is the availability of ongoing transit operating subsidy funding, as discussed in the recently completed System Plan Update for the Tahoe Truckee Area Regional Transit in Eastern Placer County (LSC, 2016). While the proposed Area Plan includes Policy T-P-22 ("Secure adequate funding for transit services so that transit is a viable transportation alternative"), it does not identify a specific mechanism to assure expansion of transit services to address increased peak demand. To provide an ongoing source of operating funding as well as transit bus seating capacity, Placer County shall establish one or more County Service Area Zones of Benefit encompassing the developable portions of the Plan area. Ongoing annual fees would be identified to fund expansion of transit capacity as necessary to expand seating capacity to accommodate typical peak-period passenger loads. At a minimum, this would consist of four additional vehicle-hours of transit service per day throughout the winter season on each of the following three routes: North Shore (North Stateline to Tahoe City), SR 89 (Tahoe City to Squaw Valley), and SR 267 (North Stateline to Northstar), as well as the expansion of transit fleet necessary to operate this additional service. Fees would be assessed on all future land uses that generate an increased demand for transit services, including residential, lodging, commercial, civic, and recreational land uses.

Mitigation Measure 10-1c: Payment of Traffic Mitigation Fees to Placer County

Prior to issuance of any Placer County Building Permits, projects within the Area Plan shall be subject to the payment of established Placer County traffic impact fees that are in effect in this area, pursuant to applicable county Ordinances and Resolutions. Traffic mitigation fees shall be required and shall be paid to the Placer County Department of Public Works and Facilities subject to the County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code. The fees will be calculated using the information supplied. If the use or the square footage changes, then the fees will change. The actual fees paid will be those in effect at the time the payment occurs.

Mitigation Measure 10-1d: Expand Requirements for Transportation Demand Management Plans

To reduce peak-period vehicle trips and improve LOS, future development project proposals which will employ between 20 and 100 employees and/or include tourist accommodation or recreational uses will be required to submit to Placer County a Transportation Demand Management Plan (TDM) upon Development Review. The current threshold for preparation of a TDM or Employee Transportation Plan (TRPA Code Section 65.5.2.B) and compliance with the Placer County Trip Reduction Ordinance (Placer County Code Section 10.20) is 100 or more employees in a single location which applies to a very limited number of sites in the Plan area. This existing requirement also does not address trips that are generated from sources other than employee commutes, and in the Plan area, a large proportion of peak period trips are the result of tourist or visitor trips rather than employee trips.

Development of the expanded requirements for TDM plans will consider trip sources and characteristics in the Plan area during peak periods. This mitigation measure will expand the requirements for TDM plans with criteria that would require some employers with fewer than 100 employees to prepare such plans and implement through project mitigation for LOS impacts.

The Project applicant shall mitigate VMT to maximum degree feasible through implementation of a TDM plan. A menu of measures that could generally be included in TDM plans is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. Additional measures determined to be potentially feasible were identified through the review of *Quantifying Greenhouse Gas Mitigation Measures* published by the California Air Pollution Control Officers Association (CAPCOA) in 2010. These measures include but are not limited to:

- ▶ Preferential carpool/vanpool parking;
- ▶ Electric vehicle parking/charging stations;
- ▶ Shuttle bus program;
- ▶ Ridesharing program;
- ▶ Transit pass subsidies;
- ▶ ~~Paid parking; and~~
- ▶ Employee parking "cash-out" program;
- ▶ Direct contributions to transit service;
- ▶ Pedestrian network improvements;
- ▶ Bicycle network improvements;
- ▶ Traffic calming measures;
- ▶ Bicycle parking;
- ▶ End of trip facilities;
- ▶ Commuter trip reduction marketing program;
- ▶ Establish a County Service Area Zone of Benefit to fund expansion of transit capacity; and
- ▶ Enhanced Neighborhood Traffic Management Program (NTMP) for the affected area.

Mitigation Measure 10-5: Create a transit service expansion funding source pursuant to Mitigation Measure 10-1b.

This impact would be minimized through the implementation of Mitigation Measure 10-1b described under Impact 10-1, above. This same mitigation measure would be required to address this impact.

New text is added on page 2-20 of the Draft EIR as follows:

2.5.2 Placer County Tahoe Basin Area Plan Mitigation Measures

The Area Plan is a joint TRPA/Placer County plan, adopted in 2016 by the Placer County Board of Supervisors and in 2017 by the TRPA Governing Board. The plan incorporates TRPA goals and regulations but also includes additional land use regulations to implement and achieve the environmental improvement and redevelopment goals of the Lake Tahoe Regional Plan and the TRPA/Tahoe Metropolitan Planning Organization Regional Transportation Plan/Sustainable Communities Strategy while also addressing local goals. A full scope environmental impact report/environmental impact statement (EIR/EIS) was prepared for the Area Plan, and because the Tahoe Cross-Country Lodge Replacement and Expansion Project is located within the Area Plan boundaries, it is required to comply with its policies and implementing regulations. The Project is ~~also~~ required to contribute to implementation of the Area Plan EIR/EIS mitigation measures that were developed as part of the EIR/EIS to avoid, minimize, or mitigate potentially significant and significant environmental effects. Applicable mitigation measures identified in the Area Plan EIR/EIS that would be implemented as part of the Project are limited to the following to address issues related to transportation, air quality, and greenhouse gas emissions:

- ▶ Mitigation Measure 10-1b: Establish a County Service Area Zone of Benefit to Fund Expansion of Transit Capacity. The Project would develop a transit zone of benefit during the County's development review process.
- ▶ Mitigation Measure 10-1c: Payment of Traffic Mitigation Fees to Placer County. The Project applicant would be required to pay traffic mitigation fees during the County's development review process.
- ▶ Mitigation Measure 10-1d: Expand Requirements for Transportation Demand Management Plans.
- ▶ Mitigation Measure 10-5: Create a Transit Service Expansion Funding Source Pursuant to Mitigation Measure 10-1b. This mitigation measure requires implementation of Area Plan EIR/EIS Mitigation Measure 10-1b, which is listed above.
- ▶ Mitigation Measure 11-2a: Reduce Short-Term Construction-Generated Emissions of Reactive Organic Gases (ROG), Oxides of Nitrogen (NO_x), and Respirable Particulate Matter with Aerodynamic Diameter of 10 Micrometers or Less (PM₁₀). The potential short-term construction-generated emissions of ROG, NO_x, and PM₁₀ from the Project are assessed in Impact 3.6-1 in Section 3.6, "Air Quality."
- ▶ Mitigation Measure 11-5: Reduce Short-Term Construction-Generated Toxic Air Contaminants (TAC) Emissions. The potential short-term construction-generated emissions of ROG, NO_x, and PM₁₀ from the Project are assessed in Impact 3.6-4 in Section 3.6, "Air Quality."
- ▶ Mitigation Measure 12-1: Implement All Feasible Greenhouse Gas Reduction Measures to Achieve No Net Increase in Emissions. The requirements of this mitigation measure are incorporated into Mitigation Measure 3.7-1a.

Response A2-5

The comment states that the Placer County required design speed for Polaris Road is 35 mph, and that the Project will be conditioned to meet the corner sight distance requirements for this speed. The comment also states that if this sight distance is not achievable, the applicant should work with the County prior to the release of the Final EIR to determine if a Design Exception could be approved for a reduced sight distance. If the Design Exception for a reduced sight distance is not acceptable, the Final EIR should identify what mitigation measures would be needed to reduce the sight distance impacts. The comment also requests that the Final EIR identify any trees and vegetation that would need to be removed to achieve the required corner sight distance.

The posted speed limit on Polaris Road, a Local Road (as indicated in the California Road System Map and Placer County General Plan), is 25 mph. In addition, based on the speed surveys conducted as a part of this study, the calculated 85th-percentile speed for traffic along Polaris Road is approximately 30 mph. The 85th-percentile of the

distribution of observed speeds is the most frequently used measure of the operating speed associated with a particular roadway location. Placer County standards (Plate 116) state that corner sight distance shall comply with Caltrans Highway Design Manual (HDM) standards. The HDM indicates that the selected design speed for a highway should be consistent with the operating speeds that are likely to be expected on a given highway facility. Consequently, the sight distance analysis at the proposed driveway location assumes a design speed of 30 mph, consistent with the operating speed calculated in the vicinity of that location. See the discussion under “Roadway Design and Hazards,” under Master Response 1: Transportation Safety, which further addresses concerns related to sight distance requirements.

Based on the understanding of potential street frontage improvements that could be required to meet sight distance standards, it is possible that some additional tree and vegetation removal beyond that characterized in the Draft EIR may be required for the proposed Project and Alternative A. All tree and vegetation removal activities are required to comply with TRPA requirements and Mitigation Measure 3.3-2 on pages 3.3-20 and 3.3-21 of the Draft EIR. Based on a review of Google Earth aerial imagery and tree data on Project site plans, it is not anticipated that with the street frontage improvements that tree removal or vegetation removal for the proposed Project or Alternative A would change substantially from the tree removal estimates provided in Table 2-2 on page 2-12 of the Draft EIR. Those estimates are based on preliminary designs for the proposed Project and Alternative A, which could be refined as the Project moves through the Placer County and TRPA permitting processes (if approved by TCPUD). To further clarify that the tree removal estimates provided in Table 2-2 of the Draft EIR are preliminary and would be refined throughout the Project approval and permitting process, Table 2-2 is revised below and in Chapter 2, “Revisions to the Draft EIR.” This refinement does not alter the conclusions with respect to the significance of impacts related to tree removal because the number of trees that would need to be removed would not be a substantial change to the number of trees already identified for removal for the proposed Project and Alternative A and would also be subject to Mitigation Measure 3.3-2, which reduces the impacts associated with tree removal to a less-than-significant level.

Table 2-2 on page 2-12 of the Draft EIR is revised to read as follows:

Table 2-2 Site Development Features

Item	Description	Existing Conditions	Proposed Project (Site D)	Alternative A
Parking	Proposed parking would meet the typical need and avoid overflow street parking in the neighborhood	46 total spaces ¹ (approx. 16,820 sq. ft.)	100 total parking spaces ² (59,799 sq. ft.)	100 total parking spaces (49,446 sq. ft.)
		2 disabled parking spaces	4 disabled parking spaces	4 disabled parking spaces
		0	2 bus parking spaces	2 bus parking spaces
School Connector	Driveway and walkway to allow shared parking; locked gate during school hours for security purposes	NA	60 – 70 linear feet	NA
Patio	For external gathering with picnic tables and outdoor grill and sink	1,345 sq. ft.	6,808 sq. ft.	6,808 sq. ft.
Kinder Sled Storage	Protected external storage to prevent damage	Along building in parking lot	80 sq. ft.	80 sq. ft.
Walkways	ADA accessible	N/A	N/A	N/A
Bike Racks	New bike racks would be provided to allow for more secure bike parking	0	<u>2-racks Minimum of 15 short-term bicycle parking spaces</u>	<u>2-racks Minimum of 10 short-term bicycle parking spaces</u>
Yurt	Existing structure moved to a new site to meet ADA standards	706 sq. ft.	706 sq. ft.	706 sq. ft.

Item	Description		Existing Conditions	Proposed Project (Site D)	Alternative A
Trees to be Removed ³	The new facilities would require tree removal	Total	NA	183	79
		Trees > 30 inches dbh	NA	15	7
New Land Coverage	Includes asphalt, building, walkways/concrete, and miscellaneous utility needs.		76,455 sq. ft. for the Alternative A site 12,334 sq. ft. for the proposed Project site ⁴	81,593 sq. ft. ⁵	67,619 sq. ft. ⁶
Site Grading/Excavation	Site grading and excavation for the parking lot, driveway, and basement; excavated material to be hauled off site		NA	3,728 cu. yd. cut/ 1,785 cu. yd. fill	3,446 cu. yd. cut/ 1,723 cu. yd. fill

Notes: cu. yd. = cubic yards; sq. ft. = square feet; dbh = diameter at breast height, NA = not applicable; N/A = not available

¹ During the parking surveys conducted for the Transportation Impact Analysis (see Appendix D), 51 cars were observed to be parked in the parking lot. Additional offsite wintertime parking is allowed under permit from Placer County, which typically accommodates up to 50 vehicles.

² Under the proposed Project, because the 46 parking spaces at the Highlands Community Center would be retained, the total amount of parking spaces that would be available at the Schilling Lodge and the Highlands Community Center would be 146 parking spaces.

³ Tree removal impacts are discussed in Section 3.3, "Biological Resources." These tree removal estimates are based on preliminary Project design and the number of trees to be removed would be refined throughout the Project approval and permitting process.

⁴ This amount of coverage for the Existing Conditions is the existing coverage and does not include any new coverage. Existing coverage includes compacted soil areas on trails and impervious surfaces as shown by the 2010 TRPA LiDAR data within the land capability districts and on the parcels in which construction for the proposed Project or Alternative A.

⁵ 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."

⁶ 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."

Source: Compiled by TCCSEA in 2018

Response A2-6

The comment states that a more comprehensive and quantitative explanation of the effect of Mitigation Measure 3.5-6a on VMT should be provided including the extent to which the identified measures could reduce VMT and in combination, how they would reduce the impact to a less-than-significant level.

Consistent with Mitigation Measure 10-1d identified in the Area Plan EIR/EIS and embodied in Policy T-P-12 of the Area Plan, the Project is required to submit a TDM plan as part of the development review process. The measures and contents, including monitoring and reporting requirements, of the TDM plan would be developed and submitted to the County subsequent to the release of the Final EIR. Mitigation Measure 3.5-6a was originally included in the Draft EIR because at the time of development of the Project description it was unclear as to whether it would be a development review requirement, regardless of the VMT impact determination within the EIR. Through coordination with Placer County it was determined that the TDM plan would in fact be required as part of the development review process; thus, it should be considered as part of the Project and not as a mitigation measure.

However, to provide a more refined and comprehensive set of potentially feasible measures that could be incorporated into the Project TDM plan, a planning level assessment of potentially feasible TDM measures was completed. The TDM measure assessment provides general descriptions of the individual TDM measures, addresses feasibility and applicability of these measures to the Project, and provides general ranges of VMT reductions that could occur with implementation of the measures. This assessment is included as Appendix A to this Final EIR. It should be noted that the VMT reduction percentages shown in Appendix A are typically specific to urban and suburban settings and do not account for the Project-specific context and details such as weather conditions, surrounding topography, and the unique land use of the Project. Additionally, many of the measures are specific to a particular subset of VMT-generating users of the Project (e.g., certain measures would only be applicable to employees). Finally, the details of the TDM plan relate to actual operation of the Project consisting of elements that

will occur over time and are not known at this time. Because of the unique context and nature of the project (i.e., weather patterns, project area topography, project land use, etc.) and the uncertainty related to Project elements and the measures that would ultimately be implemented as part of the TDM plan, the VMT reduction possible through implementation of the TDM plan was not quantified in the Draft EIR. Similarly, even though the TDM plan is now included as part of the Project as described below, the conservative approach was taken whereby the analysis did not account for any VMT related reductions associated with the TDM plan as part of the VMT modeling and analysis in Section 3.5, "Transportation," of the Draft EIR.

However, to more clearly define the Project and the difference between development review requirements considered to be part of the Project and mitigation measures required under CEQA, Section 3.5, "Transportation," and the "Executive Summary" chapter are revised in this Final EIR. These changes are presented below and in Chapter 2, "Revisions to the Draft EIR." The clarification does not alter the conclusions with respect to the significance of any environmental impact because Mitigation Measure 3.5-6b (now Mitigation Measure 3.5-6, as identified below) is retained and includes measures that would fully mitigate the impact related to the Project's increase in VMT. As described above, the level of VMT reductions the TDM measures could achieve for the Project is unknown.

A new paragraph is added after the third full paragraph on page 3.5-29 of the Draft EIR as follows:

Impact 3.5-6: Result in an Unmitigated Increase in Daily VMT

The proposed Project and Alternative A would both result in increases in daily VMT. Therefore, implementation of the proposed Project or Alternative A would result in a VMT impact, which would be **significant**.

The effect of the proposed Project and Alternative A on VMT depends on the origin and destination of vehicles traveling to and from the respective sites. Project-generated VMT within the Tahoe Basin was determined based on Project trip generation and distribution to and from the various portions of the Tahoe Basin. The change in VMT resulting from implementation of the Project is estimated based upon the net increase in regional vehicle trips generated by the Project multiplied by the average trip distance to each area. The calculated VMT are presented in Table 3.5-11.

The proposed Project and Alternative A would both be required to implement a TDM plan as part of the development review process to be consistent with Area Plan Policy T-P-12. A menu of measures that could be included in the TDM plan is provided in TRPA Code Section 65.5.3, Placer County Code Section 10.20, and CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* document. The documented VMT reduction percentages contained within *Quantifying Greenhouse Gas Mitigation Measures* (2010) are typically specific to urban and suburban settings and do not account for context and details unique to the Project, such as weather conditions, surrounding topography, and the unique land use of the Project. Additionally, some TDM measures would only apply to employees of the Project, and because of the limited number of employees even during peak days the measures that are feasible and would be effective for this size of a project need to be further refined. Because of the unique context and nature of the project (i.e., weather patterns, project area topography, project land use, etc.) and the uncertainty related to the specific measures that would ultimately be implemented as part of the TDM plan, the VMT reduction possible through implementation of a TDM plan was not quantified in the Draft EIR. Thus, to provide a conservative analysis, the VMT analysis does not apply any trip reductions associated with implementation of the required TDM plan.

As shown in Table 3.5-11, the proposed Project and Alternative A are estimated to generate an increase of approximately 1,140 VMT and 973 VMT, respectively, over the course of a peak summer day relative to existing conditions.

Proposed Project

The proposed Project is estimated to generate approximately 1,140 VMT over the course of a peak summer day relative to existing conditions. Unmitigated operational emissions of GHGs generated by automobile travel to and from the proposed Project site were modeled and shown in Section 3.7, "Greenhouse Gas Emissions and Climate Change," to demonstrate the net difference in operational activity between baseline conditions and

the proposed Project. The Project would result in an increase in daily VMT to the proposed Project site; and thus, as detailed in Section 3.7, "Greenhouse Gas Emissions and Climate Change," would not be consistent with the regional goal of reducing VMT. Therefore, implementation of the proposed Project would result in an increase in VMT; and thus, this impact would be **significant**.

Additionally, page 3.5-31 in Section 3.5, "Transportation," of the Draft EIR is revised as follows:

Mitigation Measures

~~Mitigation Measure 3.5-6a: Prepare and Implement a Transportation Demand Management Plan~~

~~This mitigation measure would apply to the proposed Project and Alternative A.~~

~~The applicant shall submit to Placer County a Transportation Demand Management Plan (TDM) as part of the development review process. A menu of measures that could be included in TDM plans is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. These measures include:~~

- ~~▶ Preferential carpool/vanpool parking;~~
- ~~▶ Shuttle bus program;~~
- ~~▶ Transit pass subsidies;~~
- ~~▶ Paid parking; and~~
- ~~▶ Direct contributions to transit service.~~

~~Mitigation Measure 3.5-6b: Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero~~

~~This mitigation measure would apply to the proposed Project and Alternative A.~~

~~The applicant shall implement Mitigation Measures 3.7-1a and 3.7-1b identified in Section 3.7, "Greenhouse Gas Emissions and Climate Change." The applicant shall implement measures to reduce all GHG emissions associated with construction and operation of the Project to zero as detailed therein. More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets are provided in Mitigation Measures 3.7-1a and 3.7-1b ~~Section 3.7~~.~~

Significance after Mitigation

~~Implementation of Mitigation Measure 3.5-6a would require~~ The applicant would be required to prepare and implement a TDM plan as part of the County development review process to reduce ~~Project-generated~~ daily VMT to the maximum degree feasible as explained in the impact analysis. Additionally, implementation of Mitigation Measure 3.5-6b requires the applicant to implement Mitigation Measures 3.7-1a and 3.7-1b that are cross-referenced here and detailed in Section 3.7, "Greenhouse Gas Emissions and Climate Change," which requires the proposed Project and Alternative A to implement measures to reduce all GHG emissions associated with construction and operation to fully mitigate GHG emissions, which includes offsetting any unmitigated GHG emissions to zero by purchasing carbon offsets. As detailed above, when evaluating VMT impacts of a project TRPA also considers the corresponding GHG emissions. Therefore, the TDM plan would reduce VMT to the extent feasible as part of the Project and all remaining GHG emissions would be reduced to zero with implementation of Mitigation Measure 3.5-6. For these reasons, the proposed Project and Alternative A would not result in an unmitigated increase in daily VMT and this impact would be reduced to **less than significant**.

Table ES-1 on page ES-16 in the "Executive Summary" chapter is revised as follows:

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No Impact LTS = Less than Significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
<p>Impact 3.5-6: Result in an Unmitigated Increase in Daily VMT The proposed Project and Alternative A would both result in increases in daily VMT. Therefore, implementation of the proposed Project or Alternative A would result in a VMT impact, which would be significant.</p>	<p>Proposed Project, Alternative A = S</p>	<p>Mitigation Measure 3.5-6a: Prepare and Implement a Transportation Demand Management Plan This mitigation measure would apply to the proposed Project and Alternative A. The applicant shall submit to Placer County a Transportation Demand Management Plan (TDM) as part of the development review process. A menu of measures that could be included in TDM plans is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. These measures include:</p> <ul style="list-style-type: none"> ▶ Preferential carpool/vanpool parking; ▶ Shuttle bus program; ▶ Transit pass subsidies; ▶ Paid parking; and ▶ Direct contributions to transit service. <p>Mitigation Measure 3.5-6b: Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero This mitigation measure would apply to the proposed Project and Alternative A. The applicant shall implement Mitigation Measure 3.7-1a and 3.7-1b identified in Section 3.7, "Greenhouse Gas Emissions and Climate Change." The applicant shall implement measures to reduce all GHG emissions associated with construction and operation of the Project to zero as detailed therein. More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets are provided in Mitigation Measures 3.7-1a and 3.7-1bSection 3.7.</p>	<p>Proposed Project, Alternative A = LTS</p>



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<p>Letter A3</p>

Erik C. White, Air Pollution Control Officer

July 24, 2020

Kim Boyd, Senior Management Analyst
 Tahoe City Public Utility District
 P.O. Box 5249
 Tahoe City, CA 96145

RE: Tahoe XC Draft EIR

Ms. Boyd:

The Placer County Air Pollution Control District (District) appreciates the opportunity to comment on the Tahoe XC Draft Environmental Impact Report (EIR). District staff have reviewed the Draft EIR and have the following comments.

A3-1

Chapter 2 Description of Proposed Project and Alternative Evaluated in Detail

1. In Figures 2-5 and 2-9 there is a design box which has the word “fuel” written in it. What is the fuel to be stored? If the fuel is gasoline, and the tank is greater than 250 gallons, an Authority to Construct/Permit to Operate is required by the District.

A3-2

Chapter 3.3 Biological Resources

1. On page 3.3-16, under Impact 3.3-2 - Tree Removal is discussed from both the proposed project site and Alternative A although there is no mention of the disposal. Under Chapter 3.4 Air Quality, Impact 3.6-1 Short-Term Construction-Generated Emissions of ROG, NOx and PM10 there is no estimation of the open burning emissions which would be from the open burning of vegetation including, tree removal, from construction. Since this method of vegetation disposal by burning was not included in the short-term construction generated emissions, the District recommends that burning of removed vegetation be prohibited during this phase of the project.
2. On page 3.3-26, under Cumulative Impacts, there is no discussion on vegetation maintenance once either the Proposed Project or Alternative A is developed. How will the disposal of vegetation be managed including any vegetation maintenance on the associated parcels, not just vegetation surrounding the project? Any burning proposed is be required to comply with District Regulation 3 - Open Burning.

A3-3

Chapter 3.5 Transportation

1. Should Table 3.5-2 come after the paragraph Net Impact on Winter Trip Generation on page 3.5-14 so that it ties in with the discussion on page 3.5-13?
2. Will the proposed project also include student practices, student winter races and student non-winter events?

A3-4

A3-5

Tahoe XC Draft EIR

3. In the Mitigation Measure 3.5-6a, Prepare and Implement a Transportation Demand Management Plan, one of the measures mentioned are transit pass subsidies. On page 3.5-1 in paragraph 4 under 3.5 Transportation, it states that both the proposed project site and Alternative A are located more than .5 mile from the closest transit stops and are topographically separated due to a steep climb that would limit transit ridership for site users. In the winter time, taking transit to either site may create difficulty for visitors as they would need to carry their ski equipment a long distance, uphill, walking in the street. Accordingly, will the transit pass subsidies be an effective measure to mitigate the project’s related VMT? What type of a shuttle bus program is being proposed? Will this be part of the existing Tahoe Area Regional Transit (TART) services or a separate program proposed by the project proponent?

A3-6

Chapter 3.6 Air Quality

1. On page 3.6-2, under Table 3.6-1, sub-note 6 discusses the Lake Tahoe Air Basin Carbon Monoxide Standard. The table’s information needs to show correctly that the carbon monoxide standard for the Lake Tahoe is 8 Hour (Lake Tahoe) - Concentration 6 ppm (7 mg/m3).

A3-7

2. On page 3.6-7 under Mitigation Measure 11-5 Reduce Short-Term Construction-Generated TAC Emissions discussion the District revised our CEQA Handbook in 2017, replacing the 2012 version which includes Appendix G Preparing a Health Risk Assessment for Land Use Projects. This discussion should reflect the information in the updated Handbook.

A3-8

3. On page 3.6-11, the attainment status for the Lake Tahoe Air Basin (LTAB) needs to be updated to the correct information. The LTAB is designated as unclassified/attainment for 1997, 2008, and 2015 ozone standard. The table needs to discuss the latest national ozone standard from 2015.

A3-9

4. On page 3.6-12 there is no discussion of diesel particulate matter (DPM) from construction activities in the air quality analysis. If the Proposed Project, next to the high school/middle school is chosen, the DPM emissions from construction equipment will need to have a quantitative analysis or at least a qualitative analysis if the quantitative analysis cannot be done.

A3-10

5. On page 3.6-14, in the paragraph following Table 3.6-4, there is a mention that a Dust Control Plan would need to be prepared and implement. Regardless of which project site is chosen, the District recommends that the dust control plan be submitted to the District at least two weeks prior to construction for review.

A3-11

6. On page 3.6-14 under Alternative A, the demolition of the Existing Lodge is mentioned. Be advised that renovation and/or demolition activities of commercial buildings are under the U.S. EPA’s NESHAP requirements. The following should be an advisory note on the improvement plans for this project.

A3-12

The Asbestos National Emission Standard for Hazardous Air Pollutants (Asbestos NESHAP) (Title 40 Code of Federal Regulations, Subpart M § 61.145) establishes

Tahoe XC Draft EIR

requirements applicable to demolition and renovation projects. Generally, these requirements are:

- Prior to beginning renovation or demolition, a thorough asbestos inspection must be conducted by a California Division of Occupational Safety and Health (CAL OSHA) Certified Asbestos Consultant or a Site Surveillance Technician.
- Owners or operators must submit written notification to the California Air Resources Board (ARB) and the U.S. Environmental Protection Agency at least 10 working days prior to beginning renovation or demolition activity.
- **For demolition projects:** Written notification is required for all demolition projects, even if no asbestos is identified in the inspection. State law prohibits local agencies from issuing demolition permits unless the applicant has demonstrated exemption or compliance with the notification requirements of the Asbestos NESHAP (CA Health and Safety Code § 19827.5).
- **For renovation projects:** Written notification is required if the amount of asbestos containing material that will be disturbed during the renovation exceeds 260 linear feet of material on pipe, 160 square feet of material on other facility components, or 35 cubic feet of “off facility components” where the length or area could not be measured prior to disturbance.

Any regulated asbestos containing material must be removed by a CALOSHA licensed and registered asbestos abatement contractor and disposed of at a landfill approved to receive asbestos containing waste material.

For more information or to obtain a copy of the Asbestos NESHAP Notification form for projects located in Placer County, please visit the ARB’s Asbestos NESHAP webpage (<http://www.arb.ca.gov/enf/asbestos/asbestos.htm>) or call ARB at (916) 322-6036 or the U.S.EPA at (415) 947-4182.

A3-12
cont.

7. On page 3.6-15 there is no discussion regarding any wood-burning appliances and/or fireplaces. The cover photo of this document showed a rock chimney with an outdoor fireplace from the lodge’s original location. From Chapter 2 on page 2-8 in Figure 2-3 the diagram for the proposed main level that shows the location of the original chimney. However, there is no indication if that chimney is to be used with any wood-burning either outside or inside. Therefore, the District recommends that wood-burning appliances / fireplaces are prohibited for both indoor and outdoor usage.

A3-13

Chapter 3.7 Greenhouse Gases

1. On page 3.7-4, under TRPA Best Construction Practices Policy for Construction Emissions in the second to last paragraph, it states the PCAPCD installed a PM10 monitor at our Tahoe City site. This is incorrect, it was and continues to be a PM 2.5 BAM monitor. This monitoring site is the only site which has a cooperative agreement with TRPA. The District does not have any monitoring equipment located at Kings Beach.

A3-14

Tahoe XC Draft EIR

- 2. On page 3.7-18, under Operational Greenhouse Gas Emission, bullet eight, discusses residential land use for outdoor cooking appliances. This is not a residential project. A3-15

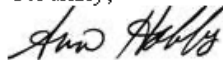
- 3. On page 3.7-18, under Mitigation Measure 3.7-1: Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero, under the Operational Greenhouse Gas Emissions section there is no quantifiable analysis of the feasible mitigation measures. In order to determine how the project is to achieve the no net increase in GHG emissions, the applicant should provide the detailed analysis to 1: identify the feasible on site mitigation measures that the project commits to implement and 2: any greenhouse gas credits should be purchased by the project to offset the greenhouse gas emissions. The District is happy to help review this analysis in order to comply with Mitigation Measure 12-1, of the no net increase in greenhouse gas emissions, developed by Placer County and TRPA for the Placer County Tahoe Basin Area Plan. This analysis should be prepared and submitted for approval and verification prior to project construction. A3-16

Chapter 3.11 – Utilities

- 1. This chapter discusses electricity needs, although there is no mention of whether either the Proposed Project or Alternative A would have standby emergency generators for power outages. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permits(s) from the District. The applicant, developer, or operator of a project that includes a generator should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a PCAPCD permit or a California Air Resources Board portable equipment registration. A3-17

Feel free to contact me if you have any questions at (530) 745-2327.

Cordially,



Ann Hobbs
Associate Planner

Letter A3 Ann Hobbs, Associate Planner
Placer County Air Pollution Control District
July 24, 2020

Response A3-1

The comment provides an introduction to the letter and no detailed response is necessary.

Response A3-2

The comment notes that Figures 2-5 and 2-9 in the Draft EIR include a note related to fuel. The comment asks what fuel is being stored and notes that if the fuel is gasoline and the tank is greater than 250 gallons then an Authority to Construct/Permit to Operate is required from the Placer County Air Pollution Control District (PCAPCD). The Draft EIR notes that operations at the Existing Lodge involve refueling equipment onsite during the winter and that these activities would continue with implementation of the proposed Project or Alternative A (see page 3-9 under Section 3.2.3, "Hazardous and Hazardous Materials"). The size of this tank is 500 gallons and is currently permitted by PCAPCD (McNair, pers. comm., 2020). The potential for an impact related to locating hazardous materials near a school is addressed on page 3-11 in Section 3.2.3, "Hazards and Hazardous Materials," of Chapter 3, "Environmental Setting, Environmental Impacts, and Mitigation Measures," in the Draft EIR. The use of hazardous materials, including fuel, at the proposed Project site near North Tahoe High School and North Tahoe Middle School was determined to be a less-than-significant impact because:

the level of use of hazardous materials in proposed Project or Alternative A construction and operation would be typical for recreation land uses, and because the proposed Project and Alternative A would be required to implement and comply with existing federal, state, TRPA, and local hazardous materials regulations, the proposed Project and Alternative A would not create significant hazards to the public or environment through the routine transport, use, and disposal of hazardous materials or from reasonably foreseeable upset and accident conditions.

To clarify the existing use and planned continued use of the 500-gallon fuel tank, Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," and Section 3.2.3, "Hazards and Hazardous Materials," of the Draft EIR are revised in this Final EIR. These changes are presented below and in Chapter 2, "Revisions to the Draft EIR." The clarification related to the existing presence and size of the fueling tank does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 4 on page 2-3 of the Draft EIR is revised to read as follows:

During winter operations, the Existing Lodge amenities include space for ticketing, rentals, retail, waxing skis, a café, and storage. Existing exterior buildings include a yurt that is used for the Winter Discovery Center and seven small buildings or structures that provide storage for cross-country ski equipment. Fueling is conducted at an existing 500-gallon fuel tank at the Highlands Community Center.

The last paragraph on page 3-9 of the Draft EIR is revised to read as follows:

During operation of the Schilling Lodge, future use and storage of hazardous materials would include fertilizers and pesticides typically used for landscaping and household cleaners that would be used for routine maintenance and would be similar to those used under existing conditions. Hazardous materials similar to those used during construction could also be used periodically as part of operation, maintenance, and repair of infrastructure, equipment, and facilities. Winter operations would also continue to conduct limited refueling for onsite equipment at the proposed Project site or Alternative A site consistent with existing conditions. With implementation of the proposed Project, the existing 500-gallon fuel tank at the Highlands Community Center would be moved to the proposed Project site and its use would continue to comply with the existing permit through the Placer County Air Pollution District (McNair, pers. comm., 2020).

Response A3-3

The comment notes that in Impact 3.3-2, which discusses tree removal, and Impact 3.6-1, which discusses short-term construction-generated emissions, there is no discussion of open burning that could be associated with tree or vegetation removal associated with construction of the Project. The comment also notes that the discussion of cumulative impacts on page 3.3-26 of the Draft EIR does not discuss vegetation management.

Trees removed for the purposes of the Project would be hauled offsite and any vegetation that requires removal would be chipped and spread onsite and/or hauled offsite for disposal. The Project would not include any kind of prescribed burning to manage vegetation on the site. As stated on page 1-1 in Chapter 1, "Introduction," of the Draft EIR, no changes are proposed to the existing Highlands Park trail system or adjacent trails on state property. As described on page 2-1 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR, the Project consists of changes related to the lodge at the Tahoe Cross-Country Center (Tahoe XC).

The Project does not include any changes to management of the lands around the lodge containing the trail system. Thus, vegetation management would continue as it currently exists and is not addressed in the Draft EIR. For these reasons, analysis of vegetation burning as a disposal method was not included in the analysis in the Draft EIR.

Response A3-4

The comment asks about placing Table 3.5-2 in Section 3.5, "Transportation," in the Draft EIR after the "Net Impact on Winter Trip Generation," section. The text first refers to Table 3.5-2 on page 3.5-10 and the table is included on page 3.5-11. Standard writing practice generally involves placing a table as early as possible after it is first mentioned in the text, which is what has been done for Table 3.5-2. For these reasons, no changes have been made to move Table 3.5-2.

Response A3-5

The comment asks whether the Project also includes student practices, student winter races, and student non-winter events. The specific users and activities that would occur at the Project site are not known at this time. However, as detailed on page 3.5-12 of Section 3.5, "Transportation," in the Draft EIR the transportation analysis is based on a set of reasonable assumptions about the types of programs, number of staff and attendees, and timing of the programs that could occur at the Schilling Lodge under the proposed Project and Alternative A based on existing operations and programs at the Existing Lodge. Additionally, the traffic analysis is based on data collected and modeled for a typical busy day at Tahoe XC and the analysis takes the conservative approach of assuming that skier visitation during winter conditions could increase by 10 percent. The traffic analysis assumption of 10 percent growth in skier visitation is assumed to be conservative because visitation to Tahoe XC during the winter has not grown and trip generation at a ski area or trailhead is typically a function of the skiable terrain, snow conditions, and skier capacity rather than lodge amenities. Because the Project would not alter the terrain or skier capacity, the number of skiers expected to visit the site is expected to be the same as the number that currently travel to the Existing Lodge (see page 3.5-12 of Section 3.5, "Transportation," of the Draft EIR). Therefore, the existing usage of the current facilities by students for practices would be captured and included in the analysis due to the use of collected traffic counts. Additionally, by conservatively assuming a 10 percent increase in skier visitation during the winter condition any additional future winter use of the facilities by students for practices would reasonably be accounted for within the 10 percent visitor increase during winter conditions.

As detailed on page 3.5-13 of Section 3.5, "Transportation," in the Draft EIR, the trip generation analysis assumes that a 65-person gathering (including event attendees, staff, performers, volunteers) would occur on a typical busy winter day (either weekend or weekday). Additionally, the analysis assumes that parking demand would not exceed what could be provided onsite, and carpooling would be encouraged as part of the rental agreement for private events; thus, the aforementioned assumption of a 65-person gathering would include events such as student winter races and the daily trip generation does account for these events.

As detailed on page 3.5-16 of Section 3.5, "Transportation," in the Draft EIR, the summer trip generation was based on collected traffic counts, which captured junior mountain biking sessions and/or summer devo team/Nordic dryland training activities. In addition to the aforementioned types of events, which were accounted for in the existing usage of the current facilities, as detailed on page 3.5-16 of the Draft EIR, the trip generation analysis also assumes events

such as summer youth camps could potentially occur at the Schilling Lodge during summer days. Therefore, because simultaneous events are not expected to occur on the same day, the usage of the current facilities by students for non-winter events would reasonably be accounted for through the use of the collected traffic counts and the assumed events used to estimate the trip generation. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

To clarify that the 10 percent growth in skier visitation does not include the increase in visitation associated with future events and gatherings at the Schilling Lodge, the "Methods and Assumptions" section in Section 3.5, "Transportation," in the Draft EIR is revised to clarify that visitation associated with events and gatherings would be in addition to the 10 percent growth in skier visitation. This revision results in the text of the "Methods and Assumptions" section is consistent with the trip generation analysis in Table 3.5-2, "Winter Trip Generation: Proposed Project," on page 3.5-11 of the Draft EIR and Table 3.5-3, "Winter Trip Generation: Alternative A," on page 3.5-14. This clarification would not alter the conclusions with respect to the significance of any environmental impact because it does not result in any changes to the trip generation in the Draft EIR analysis.

The eighth paragraph on page 3.5-12 of the Draft EIR is revised as follows:

Trip Generation

The Schilling Lodge is not expected to increase skier visitation to the site. Trip generation at a ski area or trailhead is typically a function of the skiable terrain, snow conditions, and skier capacity rather than lodge amenities. Because the proposed Project would not alter the terrain or skier capacity, the number of skiers expected to visit the site is expected to be the same as the number that currently travel to the Existing Lodge. While additional visitation is not expected for the aforementioned reasons, this analysis takes a conservative approach and assumes skier visitation during winter conditions would increase by 10 percent. The 10 percent increase in skier visitation is in addition to. This would also account for any increase in visitation resulting from events and gatherings held at the Schilling Lodge, as shown in Tables 3.5-2 and 3.5-3.

Response A3-6

The comment questions the effectiveness of transit pass subsidies (Mitigation Measure 3.5-6a on page 3.5-31 of the Draft EIR) given the distance of the nearest transit stop (more than one-half mile from the Project site), the topographical character of the area, seasonal weather conditions. Additionally, the comment posits the question of what type of a shuttle bus program is being proposed and if it would be part of the existing Tahoe Area Regional Transit (TART) services or a separate program proposed by the applicant.

Response to comment A2-6 discusses preparation of a TDM plan as part of the development review process. Measures that may be included in a TDM plan include provision of shuttle buses. Additionally, as noted on page 2-14 in Chapter 2, "Description of the Proposed Project and Alternatives Evaluated in Detail," special events could provide shuttles or encourage carpooling to the events. Measures that were listed in the now removed Mitigation Measure 3.5-6a (see response to comment A2-6 that explains the Project is required to submit a TDM plan as part of the development review process and in accordance with Area Plan EIR/EIS Mitigation Measure 10-1d: Expanded Requirements for TDM Plans) included transit pass subsidies as an example of measures that could be included in a TDM plan. As detailed in that response, the measures and associated details would be developed by the applicant as part of the development review process with the County. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response A3-7

The comment states that Table 3.6-1 on page 3.6-2 in Section 3.6, "Air Quality," of the Draft EIR needs to correctly show the carbon monoxide standard for the Lake Tahoe region. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." The correction does not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the following text edit is made to Table 3.6-1 on page 3.6-2 of the Draft EIR:

Table 3.6-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS ^{1,2}	NAAQS ³	
			Primary ^{2,4}	Secondary ^{2,5}
Ozone	1-hour	0.09 ppm (180 µg/m ³)	— ^e	Same as primary standard
	8-hour	0.070 ppm (137 µg/m ³)	0.070 ppm (147 µg/m ³)	
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	Same as primary standard
	8-hour	6 ppm ^{4, 6} (7 mg/m ³)	9 ppm (10 mg/m ³)	
Nitrogen dioxide (NO ₂)	Annual arithmetic mean	0.030 ppm (57 µg/m ³)	53 ppb (100 µg/m ³)	Same as primary standard
	1-hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	—
Sulfur dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	—	—
	3-hour	—	—	0.5 ppm (1300 µg/m ³)
	1-hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	—
Respirable particulate matter (PM ₁₀)	Annual arithmetic mean	20 µg/m ³	—	Same as primary standard
	24-hour	50 µg/m ³	150 µg/m ³	
Fine particulate matter (PM _{2.5})	Annual arithmetic mean	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
	24-hour	—	35 µg/m ³	Same as primary standard
Lead	Calendar quarter	—	1.5 µg/m ³	Same as primary standard
	30-Day average	1.5 µg/m ³	—	—
	Rolling 3-Month Average	—	0.15 µg/m ³	Same as primary standard
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m ³)	No national standards	
Sulfates	24-hour	25 µg/m ³		
Vinyl chloride ⁷	24-hour	0.01 ppm (26 µg/m ³)		
Visibility reducing particulate matter	8-hour	Extinction of 0.23 per km		

Notes: CAAQS = California ambient air quality standards, NAAQS = national ambient air quality standards, µg/m³ = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million

- ¹ California standards for ozone, carbon monoxide, SO₂ (1- and 24-hour), NO₂, particulate matter, and visibility reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- ² Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- ³ National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. The PM₁₀ 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. The PM_{2.5} 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. Environmental Protection Agency for further clarification and current federal policies.
- ⁴ National primary standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- ⁵ National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- ⁶ The California ambient air quality standards are 9 parts per million; however, in the Lake Tahoe Air Basin, this standard is 6 parts per million (7 mg/m³). CARB established this more stringent standard in 1976 based on the Lake Tahoe Basin's elevation and associated thinner air.
- ⁷ The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: CARB 2016

Response A3-8

The comment states that the language of Mitigation Measure 11-5, "Reduce Short-Term Construction-Generated TAC Emissions," on page 3.6-7 of the Draft EIR should be updated to include PCAPCD's updated 2017 CEQA Handbook to include the new Appendix G. The language of Mitigation Measure 11-5 summarized on page 3.6-7 of the Draft EIR is taken from the Placer County Tahoe Basin Area Plan (Area Plan) and Tahoe City Lodge Project EIR/EIS (EIR/EIS), which determined that pollution associated with construction of land uses in the Area Plan would generate substantial toxic air contaminant (TAC) emissions resulting in adverse impacts to sensitive receptors. Mitigation Measure 11-5 was identified during the environmental review process, which culminated in the certification of the Final EIR/EIS by Placer County on December 6, 2016 and by TRPA on January 25, 2017. At that time, PCAPCD's most recent CEQA guidance was its 2012 edition, which included Appendix E with instructions regarding TAC impact analysis and guidance for preparation of health risk assessments (HRAs). As such, the language summarized on page 3.6-7 of the Draft EIR represents the most current regulatory language at the time of writing of the Area Plan EIR/EIS. Mitigation Measure 11-5 is incorporated by reference, and this EIR does not have the authority to retroactively adjust mitigation language from the Area Plan EIR/EIS.

The preparation of an HRA is based on a facility identified and a priority by an air district, as well as the potency, toxicity, quantity of emissions, and proximity to sensitive receptors. Mitigation Measure 11-5, among others, would apply to the Project as the Project is situated within the Area Plan; however, as discussed on pages 3.6-17 through 3.6-18 of the Draft EIR, because the Project would generate exhaust emissions of 6.3 pounds per day (lb/day) of respirable particulate matter (PM₁₀) emissions, which is not considered substantial. Based on this quantity of emissions and the highly vegetative nature of the Project site, construction-generated TAC emissions would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a hazard index of 1.0 or greater. No edits to the Draft EIR are required in response to this comment. No further response is required.

Response A3-9

The comment states that the attainment status for the Lake Tahoe Air Basin (LTAB) on page 3.6-11 in Section 3.6, "Air Quality," of the Draft EIR needs to be updated to reflect the LTAB's most recent (2015) national ozone attainment standard. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." The correction does not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the following text edit is made to Table 3.6-3 on page 3.6-11 of the Draft EIR:

Table 3.6-3 Attainment Status Designations for Placer County¹

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Ozone	-	Attainment (1-hour)
	Unclassified/Attainment (8-hour) ²	Attainment (8-hour)
	Nonattainment Unclassified/Attainment (8-hour) ^{2,3}	
Respirable particulate matter (PM ₁₀)	Attainment (24-hour)	Nonattainment (24-hour)
		Nonattainment (Annual)
Fine particulate matter (PM _{2.5})	Attainment (24-hour)	-
	Attainment (Annual)	Attainment (Annual)
Carbon monoxide (CO)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Nitrogen dioxide (NO ₂)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (Annual)	Attainment (Annual)
Sulfur dioxide (SO ₂) ³	Unclassified/Attainment (1-Hour)	Attainment (1-hour)
		Attainment (24-hour)
Lead (Particulate)	Attainment (3-month rolling avg.)	Attainment (30 day average)
Hydrogen Sulfide	No Federal Standard	Unclassified (1-hour)
Sulfates		Attainment (24-hour)

Table 3.6-3 Attainment Status Designations for Placer County¹

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Visibly Reducing Particles		Unclassified (8-hour)
Vinyl Chloride		Unclassified (24-hour)

Notes:

¹ 1997—Standard: Placer County, as a whole, resides within three discrete air basins (i.e., Mountain Counties Air Basin, Sacramento Valley Air Basin, and Lake Tahoe Air Basin). The attainment designations within this table apply to the portion of Placer County that is located within the Lake Tahoe Air Basin, where the Project is located.

² 2008 2010 – Standard

³ 2010 2015 – Standard

Source: CARB 2018

Response A3-10

The comment asserts that there is no discussion of diesel particulate matter (diesel PM) from construction activities on page 3.6-12 and that a qualitative analysis should be done if a quantitative analysis cannot be done. Pages 3.6-12 through 3.6-13 in Section 3.6, “Air Quality,” of the Draft EIR under the heading, “Methodology,” states:

[t]he level of health risk from exposure to construction- and operation-related TAC emissions was assessed qualitatively. This assessment was based on the proximity of TAC-generating construction activity to offsite sensitive receptors, the number and types of diesel-powered construction equipment being used, and the duration of potential TAC exposure.

Construction-generated diesel PM is later discussed on pages 3.6-17 through 3.6-18 of the Draft EIR in the impact discussion for Impact 3.6-4. The analysis states:

[p]articulate exhaust emissions from diesel-fueled engines (i.e., diesel PM) were identified as a TAC by CARB in 1998. The potential cancer risk from inhaling diesel PM outweighs the potential for all other diesel PM-related health impacts (i.e., noncancer chronic risk, short-term acute risk) and health impacts from other TACs (CARB 2003:K-1). Chronic and acute exposure to noncarcinogens is expressed as a hazard index, which is the ratio of expected exposure levels to an acceptable reference exposure level. As shown in Table 3.6-4 above, maximum daily exhaust emissions of PM₁₀, which is considered a surrogate for diesel PM, could reach up to 6.3 lb/day during construction.

Thus, construction-generated diesel PM is evaluated qualitatively as stated on page 3.6-12 of the Draft EIR. No edits to the Draft EIR are required in response to this comment.

Response A3-11

The comment states on page 3.6-14, there is mention that a Dust Control Plan would need to be prepared and implemented, and the comment suggests that this plan be submitted to PCAPCD at least 2 weeks prior to construction for review. The comment addresses a regulatory requirement of PCAPCD and does not address the adequacy of the Draft EIR. The comment is noted. No edits to the Draft EIR are required in response to this comment.

Response A3-12

The comment discusses the regulatory requirements of the U.S. Environmental Protection Agency’s (EPA’s) National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos associated with the demolition of the Existing Lodge under Alternative A. The comment notes that demolition plans for the Existing Lodge under Alternative A should include an advisory note related to NESHAP requirements. EPA’s NESHAPs are discussed in paragraph 4 on page 3.6-3 in Section 3.6, “Air Quality,” of the Draft EIR. The discussion states:

EPA regulates HAPs through the National Emission Standards for Hazardous Air Pollutants. The standards for a particular source category require the maximum degree of emission reduction that EPA determines to be achievable, which is known as the Maximum Achievable Control Technology—MACT standards. These

standards are authorized by Section 112 of the CAA and the regulations are published in 40 Code of Federal Regulations (CFR) Parts 61 and 63.

The comment specifically summarizes the regulatory requirements of 40 CFR Part 61, Section 61.145. This is a subsection of 40 CFR Part 61, which is included in the aforementioned discussion on page 3.6-3 in Section 3.6, "Air Quality," of the Draft EIR. The Project would be subject to all applicable sections of 40 CFR Part 61, including Section 61.145.

The potential hazardous issues associated with demolition of the Existing Lodge under Alternative A and the NESHAP requirements for buildings that may contain asbestos are discussed in the first and second paragraphs on page 3-10 under Section 3.2.3, "Hazards and Hazardous Materials," of the Draft EIR. However, Section 3.2.3 is revised in this Final EIR to further clarify the need to include an advisory note on improvement plans for Alternative A. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." The clarification does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 2 on page 3-10 of the Draft EIR is revised to read as follows:

Federal and state regulations govern the renovation and demolition of structures where materials containing lead and asbestos could be present. Asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services. Demolition of any building, such as demolition of the Existing Lodge under Alternative A, that could contain asbestos (based on the age of the building) would be regulated as an Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) Regulated Facility. An Asbestos NESHAP Regulated Facility is subject to a thorough asbestos inspection of the facility and testing of materials to determine whether asbestos is present that must be conducted by a California Occupational Safety and Health Administration- (Cal/OSHA-) certified asbestos consultant (Cal/OSHA regulations, California Labor Code, Sections 9021.5 through 9021.8). Demolition projects require a NESHAP Notification even if there is found to be no asbestos present after testing. Section 1532.1 in Title 8 of the California Code of Regulations addresses construction work where an employee may be occupationally exposed to lead. An advisory note shall be included on improvement plans for Alternative A identifying applicable NESHAP requirements, including requirements related to surveying for asbestos, notifications, and removal of asbestos. In compliance with Cal/OSHA regulations, surveys for indicators of lead-based coatings, and flakes in soil, would be conducted before demolition of the Existing Lodge under Alternative A to further characterize the presence of lead on the Alternative A site. Loose or peeling paint may be classified as a hazardous waste if concentrations exceed total threshold limits. Cal/OSHA regulations require air monitoring, special work practices, and respiratory protection during demolition and paint removal where even small amounts of lead have been detected. Agency notification and compliance with California Department of Health Services and Cal/OSHA regulations would require that the presence of these materials be verified and remediated, which would eliminate potential health risks associated with exposure to asbestos or lead during building demolition associated with Alternative A. For this reason, this impact would be less than significant, and no mitigation would be required.

Response A3-13

The comment notes that photos of the Schilling residence show a chimney but the document does not discuss whether or not the chimney would be wood burning. The comment recommends that wood-burning appliances or fireplaces be prohibited for indoor and outdoor use. On page 3-16 under Section 3.2.9, "Wildfire," the Draft EIR notes the Schilling Lodge would include one indoor gas fireplace. However, Section 2.5.1, "Project Characteristics," is revised in this Final EIR to clarify the Project's intent to use a gas fireplace and not allow wood burning. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." This clarification does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 4 on page 2-10 of the Draft EIR is revised to read as follows:

Main Level

The Project utilizes the high design values of the historic Shilling residence as the main public area of the Schilling Lodge. This space would house the primary social spaces proposed, including a lounge, small meeting space and café kitchen in repurposed rooms such as the living room, dining room, and former kitchen. The main level would also support spaces such as restrooms, ticket counter and retail space. The proposed arrangement of these spaces, locating the ticket and café counters near each other, allows for reduced staff, improved internal circulation between use areas, and a more efficient operation compared to the current facility. The original fireplace would be retained but would be repurposed as a gas fireplace and would not be wood burning. If use of the outdoor fireplace would occur then it would also operate as a gas fireplace and would not be wood burning.

Response A3-14

The comment asserts that page 3.7-4, under the TRPA Best Construction Practices Policy for Construction Emissions in the second to last paragraph incorrectly states that PCAPCD installed a respirable particulate matter (PM₁₀) monitor at the Tahoe City site and that this site continues to be a fine particulate matter (PM_{2.5}) monitoring site. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." The correction does not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the following text edit is made to paragraph 4 on page 3.7-4 of the Draft EIR:

The overall efficacy of these measures and other efforts to attain and maintain air quality standards will continue to be monitored through a comprehensive multi-agency air quality program. The existing air quality monitoring program is being expanded to ensure adequate data continues to be available to assess the status and trends of a variety of constituents. In 2011, TRPA established additional ozone and particulate monitoring at the Stateline Monitoring Site. Working under a cooperative agreement with the TRPA, the Placer County Air Pollution Control District (PCAPCD) installed additional ozone and PM_{402.5} monitors in Tahoe City and Kings Beach in 2011. In 2013, TRPA installed an additional Visibility Monitoring Station and an ozone monitor in South Lake Tahoe.

Additionally, in response to this comment, the following text edit is made to paragraph 1 on page 3.6-5 of the Draft EIR.

The overall effectiveness of these measures and other efforts to attain and maintain air quality standards will continue to be monitored through a comprehensive multi-agency air quality program. The existing air quality monitoring program is being expanded to ensure adequate data continues to be available to assess the status and trends of a variety of constituents. In 2011, TRPA established additional ozone and PM monitoring at the Stateline Monitoring Site. Working under a cooperative agreement with TRPA, PCAPCD installed additional ozone and PM_{402.5} monitors in Tahoe City and Kings Beach in 2011 (though the monitor at Kings Beach is no longer operated). In 2013, TRPA installed an additional Visibility Monitoring Station and an ozone monitor in South Lake Tahoe.

Response A3-15

The comment states that on page 3.7-18 in Section 3.7, "Greenhouse Gas Emissions and Climate Change," the eighth bullet under "Operational Greenhouse Gas Emissions" within Mitigation Measure 3.7-1, which discusses residential land use for outdoor cooking appliances, should not apply as the Project is not a residential project. The Project is not considered a residential land use; however, the Project could support outdoor cooking appliances to support future events. As such, the tenets of bullet 8 that would reduce GHG emissions through use of natural gas instead of higher-GHG generating fuel sources would continue to apply. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." The correction does not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the following text edit is made to bullet 8 on page 3.7-18 of the Draft EIR:

- ▶ The applicant shall require gas or propane outlets in private outdoor areas ~~of residential land uses~~ for use with outdoor cooking appliances such as grills if natural gas service or propane service is available.

Response A3-16

The comment states that there is not quantification of Mitigation Measure 3.7-1, "Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero." Page 3.7-17 of Section 3.7, "Greenhouse Gas Emissions and Climate Change," in the Draft EIR states, "The effort to quantify the GHG reductions shall be fully funded by the applicant." This action would be undertaken by a qualified GHG specialist at a later date once the Project applicant has reviewed the applicability of the onsite GHG reduction measures listed under Mitigation Measure 3.7-1. At the time of writing of the Draft EIR, the feasibility of which onsite GHG reduction measures is unknown and, therefore, not quantified. Feasibility would be determined based on a measure's efficacy in reducing GHG reductions. A measure may additionally be dismissed if it is reasoned that a measure is economically infeasible. Following the quantification of the GHG reduction measures achieved through these measures, the Project applicant's qualified GHG specialist shall reduce any remaining GHG emissions to zero through the purchase of carbon credits.

In response to the commenter's note regarding the purchase of carbon offsets as a component of Mitigation Measure 3.7-1 and in response to the California Supreme Court's decision in *Golden Door Properties v. County of San Diego et al. Real Parties of Interest* Cal.App.5th, (herein referred to as Golden Door II), the language of Mitigation Measure 3.7-1 in Section 3.7, "Greenhouse Gas Emissions and Climate Change," of the Draft EIR is revised below and in Chapter 2, "Revisions to the Draft EIR." Notably, Mitigation Measure 3.7-1 is split into two components, Mitigation Measure 3.7-1a and Mitigation Measure 3.7-1b, to require that the Project applicant prioritize onsite GHG reduction design features prior to the purchase of carbon offsets. Because this refinement of Mitigation Measure 3.7-1 clarifies that onsite GHG reduction would be prioritized prior to purchase of carbon offsets, this clarification does not alter the conclusions with respect to the significance of any environmental impact.

Mitigation Measure 3.7-1 on pages 3.7-17 through 3.7-19 of the Draft EIR is revised as follows:

Mitigation Measure 3.7-1a: Incorporate All Feasible Onsite Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero

This mitigation measure would apply to the proposed Project and Alternative A.

The applicant shall implement all feasible measures to reduce all GHG emissions associated with construction and operation of the Project to zero. ~~More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets is provided below. A mitigation measure may be deemed infeasible if the Project applicant provides rationale, based on substantial evidence, to the County that substantiates why the measure is infeasible. The GHG reductions achieved by the implementation of measures listed below shall be estimated by a qualified third-party selected by the County. All GHG reduction estimates shall be supported by substantial evidence. Mitigation measures should be implemented even if it is reasonable that their implementation would result in a GHG reduction, but a reliable quantification of the reduction cannot be substantiated. The Project applicant shall incorporate onsite design measures into the Project and submit verification to the County prior to issuance of building permits. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8).~~

Construction-Related Greenhouse Gas Emissions

The applicant shall implement all onsite feasible measures to reduce GHGs associated with Project construction. Such measures shall include, but are not limited to, the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD's CEQA Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.

- ▶ The applicant shall enforce idling time restrictions for construction vehicles.
- ▶ The applicant shall increase use of electric-powered construction equipment including use of existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators.

- ▶ The applicant shall require diesel-powered construction equipment to be fueled with renewable diesel fuel. The renewable diesel product that is used shall comply with California's Low Carbon Fuel Standards and be certified by the California Air Resources Board Executive Officer.
- ▶ The applicant shall require that all diesel-powered, off-road construction equipment shall meet EPA's Tier 4 emissions standards as defined in 40 Code of Federal Regulation (CFR) 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068.
- ▶ The applicant shall implement waste, disposal, and recycling strategies in accordance with Sections 4.408 and 5.408 of the 2016 California Green Building Standards Code (CALGreen Code), or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of Project construction.
- ▶ Project construction shall achieve or exceed the enhanced Tier 2 targets for recycling or reusing construction waste of 65 percent for nonresidential land uses as contained in Sections A5.408 of the CALGreen Code.

Operational Greenhouse Gas Emissions

The applicant shall implement all onsite feasible measures to reduce GHGs associated with operation of the Project. Such measures shall include, but are not limited to, the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD's Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.

- ▶ The applicant shall achieve zero net energy (ZNE) if feasible. Prior to the issuance of building permits the Project developer or its designee shall submit a Zero Net Energy Confirmation Report (ZNE Report) prepared by a qualified building energy efficiency and design consultant to the county for review and approval. The ZNE Report shall demonstrate that development within the Project area subject to application of the California Energy Code has been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, or otherwise achieve an equivalent level of energy efficiency, renewable energy generation, or GHG emissions savings. This measure would differ from the achievement of zero net electricity because ZNE also concerns onsite consumption of natural gas.
- ▶ The applicant shall consult with Liberty Utilities to assess the feasibility of onsite solar. If it is determined that onsite solar is feasible, the building shall include rooftop solar photovoltaic systems to supply electricity to the building.
- ▶ If onsite solar is determined to be feasible, the applicant shall install rooftop solar water heaters if room is available after installing photovoltaic panels.
- ▶ Any household appliances required to operate the building shall be electric and certified Energy Star-certified (including dish washers, fans, and refrigerators, but not including tankless water heaters).
- ▶ All buildings shall be designed to comply with requirements for water efficiency and conservation as established in the CALGreen Code.
- ▶ The applicant shall also provide Level 2 electric vehicle charging stations at a minimum of 10 percent of parking spaces that the Project.
- ▶ The applicant shall dedicate onsite parking for shared vehicles.
- ▶ The applicant shall require gas or propane outlets in private outdoor areas of residential land uses for use with outdoor cooking appliances such as grills if natural gas service or propane service is available.
- ▶ The applicant shall require the installation of electrical outlets on the exterior walls of both the front and back of proposed lodge to support the use of electric landscape maintenance equipment.

- ▶ The applicant shall require the use of energy-efficient lighting for all area lighting.

Notably, the California Air Pollution Officers Associations (CAPCOA) identifies parking restrictions as a feasible measure to reduce GHG emissions; however, parking restrictions have not been dismissed as infeasible onsite mitigation due to existing and projected community impacts associated with spillover parking into nearby residential neighborhoods during peak seasonal periods. Nonetheless, even without limitations on parking availability, a no net increase in GHG emissions can be achieved.

Mitigation Measure 3.7-1b: Purchase Real, Quantifiable, Permanent, Verifiable, Enforceable, and Additional Carbon Offsets

If, following the application of all feasible onsite GHG reduction measures implemented under Mitigation Measure 3.7-1a, the proposed Project or Alternative A would continue to generate GHG emissions in exceedance of a net-zero threshold, the Project applicant shall offset the remaining GHG emissions before the end of the first full year of Project operation to meet the net-zero threshold by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits.

CARB recommends that lead agencies prioritize onsite design features, such as those listed under Mitigation Measure 3.7-1a, and direct investments in GHG reductions within the vicinity of a project site to provide potential air quality and economic co-benefits locally (CARB 2017). While emissions of GHGs and their contribution to climate change is a global problem, emissions of air pollutants, which have an adverse localized and regional impact, are often emitted from similar activities that generate GHG emissions (i.e., mobile, energy, and area sources). For example, direct investments in a local building retrofit program could pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, enhanced energy efficient windows, insulation, and water conservation features for homes within the geographic area of the Project. Other examples of local direct investments including financing of regional electric vehicle charging stations, paying for electrification of public school buses, and investing in local urban forests. These types of investments result in a decrease in GHG emissions to meet the criteria of being real, quantifiable, permanent, verifiable, enforceable, and additional consistency with the standards set forth in Health and Safety Code Section 38562, subdivisions (d)(1) and (d)(2). Such credits shall be based on protocols approved by CARB, consistent with Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by Placer County, TRPA, or Placer County Air Pollution Control District (PCAPCD). Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) through the CAPCOA GHG Rx and PCAPCD. In addition to implementing all feasible onsite measures to reduction GHGs associated with construction and operation of the Project, the applicant shall offset the remaining levels of GHG emissions to zero by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits from any of the following recognized and reputable voluntary carbon registries:

(A) American Carbon Registry;

(B) Climate Action Reserve; and/or

(C) Verra (formally named Verified Carbon Standard).

The applicant shall demonstrate that it has purchased and retired a sufficient quantity of carbon offsets prior to receipt of building permits from Placer County. The applicant shall purchase and retire a quantity of carbon credits sufficient to fully offset the Project's remaining operational emissions multiplied by the number of years of operation between commencement of operation and 2045, which is the target year of Executive Order B-55-18.

Prior to issuing building permits for Project development, Placer County shall confirm that the applicant or its designee has fully offset the Project's remaining (i.e., after implementation of GHG reduction measures pursuant to Mitigation Measure 3.7-1a) GHG emissions by relying upon one of the following compliance options, or a combination thereof:

- ▶ demonstration that the Project applicant has directly undertaken or funded activities that reduce or sequester GHG emissions that are estimated to result in GHG reduction credits (if such programs are available), and retire such GHG reduction credits in a quantity equal to the Project's remaining GHG emissions;
- ▶ demonstration that the applicant shall retire carbon credits issued in connection with direct investments (if such programs exist at the time of building permit issuance) in a quantity equal to the Project's remaining GHG emissions;
- ▶ undertake or fund direct investments (if such programs exist at the time of building permit issuance) and retire the associated carbon credits in a quantity equal to the Project's remaining GHG emissions; or
- ▶ if it is impracticable to fully offset the Project's GHG emissions through direct investments or quantifiable and verifiable programs do not exist, the applicant or its designee may purchase and retire carbon credits that have been issued by a recognized and reputable, accredited carbon registry in a quantity equal to the Project's remaining GHG Emissions.

Significance after Mitigation

TCPUD notes that the list of recommended measures includes limiting the number of parking spaces as a means of reducing GHG emissions. This item has not been included in Mitigation Measure 3.7-1a, because the community has expressed concern regarding the intrusion of spillover parking into residential neighborhoods. TCPUD would like to minimize spillover parking. For this reason, sufficient parking has been provided to avoid significant spillover parking problems. TCPUD notes that, even without limiting the supply of onsite parking, the threshold—no net increase of GHG emissions—can be achieved.

Implementation of Mitigation Measures 3.7-1a and 3.7-1b would ensure that the proposed Project or Alternative A would not result in a net increase in GHG emissions and, thus, would not conflict with CARB's 2017 Scoping Plan or any established statewide GHG reduction targets (i.e., SB 32 of 2016 and Executive Order B-55-18). Thus, the proposed Project's or Alternative A's contribution to climate change would be reduced to **less than significant**.

Implementation of Mitigation Measures 3.7-1a and 3.7-1b would ensure that the proposed Project or Alternative A would not result in a net increase in GHG emissions and, thus, would not conflict with CARB's 2017 Scoping Plan or any established statewide GHG reduction targets (i.e., SB 32 of 2016 and Executive Order B-55-18).

Response A3-17

The comment notes that Section 3.11, "Utilities," in the Draft EIR discusses electricity needs but does not mention the potential need for standby emergency generators for power outages. The comment notes that any project that may use equipment capable of releasing emissions to the atmosphere may require permits from PCAPCD and suggests that the applicant contact PCAPCD early to determine if a permit is required. The comment notes that portable construction equipment with an internal combustion engine over 50 horsepower are required to obtain a PCAPCD permit or CARB portable equipment registration. To clarify that the Project would install a generator at the Schilling Lodge for the purposes of a backup supply, Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," 3.6, "Air Quality," Section 3.7, "Greenhouse Gas Emissions and Climate Change," Section 3.8, "Noise," Section 3.11, "Utilities," and Section 3.12, "Energy," are revised. These changes are presented below and in Chapter 2, "Revisions to the Draft EIR." This clarification does not alter the conclusions with respect to the significance of any environmental impact.

The fifth paragraph on page 2-7 of the Draft EIR under the "Proposed Schilling Lodge" section in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," is revised to read as follows:

Unlike the Existing Lodge, the Schilling Lodge would have space dedicated for public lockers, public showers, staff administrative functions, first aid, a team room, and a garage (see Figure 2-3). The Schilling Lodge would have space dedicated for public meetings; whereas, the Existing Lodge relies on the yurt for public meetings. The increase in space at the Schilling Lodge would be accommodated by the repurposed Schilling

residence, an addition to the building, and a basement. A visual representation of the Schilling Lodge facility is shown in Figure 2-4 below. A generator would be installed at the Schilling Lodge that could be used in the event of a power outage.

The following discussion is added on page 3.6-17 preceding paragraph six in Section 3.6, "Air Quality," in the Draft EIR:

A generator would be installed at the Schilling Lodge to be used in the event of a power outage. This generator would be obtained in accordance with the applicable permitting process overseen by PCAPCD. The generator would be anticipated to run for brief 10- to 15-minute increments every week to verify that the generator continues to be operational. This level of operation would be minimal and would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a hazards index of 1.0 or greater. Therefore, construction activities and their respective contribution of TACs comprise the focus of this analysis.

The first paragraph on page 3.7-16 in Section 3.7, "Greenhouse Gas Emissions and Climate Change," in the Draft EIR is revised to read as follows:

The Existing Lodge currently supports the Tahoe Cross-Country facility. With implementation of the proposed Project, operations at the Highlands Community Center would continue at a lower rate as compared to existing conditions as these activities would be redirected to the proposed Project site. As such, operational emissions of GHGs were modeled to demonstrate the net difference in operational activity between baseline conditions and the proposed Project. Operational emissions of GHGs would be generated by automobile travel to and from the proposed Project site, electricity usage, natural gas combustion, water usage, wastewater and solid waste generation, ~~and~~ and area sources such as landscaping equipment, and the periodic use of a 40 horsepower generator. The analysis of GHG emissions also includes operation of the Existing Lodge with some community meetings and recreation classes. These emissions associated with the proposed Project are summarized in Table 3.7-5 for 2023, the first year of proposed Project operation.

The impact title for Impact 3.8-3 is revised on page 3.8-17 in Section 3.8, "Noise," in the Draft EIR to clarify that the impact analysis addresses all operational noise, not just noise generated from events. A new paragraph is added after the fifth paragraph on page 3.8-17 to address the intermittent use of a generator during operations as follows:

Impact 3.8-3: Operational Event Noise

The proposed Project and Alternative A would be similar to what occurs in the ~~the~~ Project vicinity now. ~~Long-term~~ Long-term increases in noise would be associated with outdoor recreational and sporting events at the Schilling Lodge. The increases in noise would not exceed applicable Area Plan noise standards (i.e., 55 dBA CNEL). Use of amplified sound would be required to comply with TCPUD rules and regulations and Placer County noise ordinance for operating hours; however, the use of amplified sound at the Schilling Lodge could result in exposure of sensitive receptors to noise levels that exceed the Placer County daytime (7:00 a.m. to 10:00 p.m.) noise standard of 50 dBA L_{eq} for amplified sound sources. This impact would be **significant** for the proposed Project and Alternative A.

Proposed Project

The Schilling Lodge would provide internal and external space for a variety of uses and events. Regarding long-term increases in operational noise, the primary (i.e., loudest) noise sources would be associated with community, private, and special events occurring at the Schilling Lodge. Events that could occur at the Schilling Lodge would be similar in nature to events that currently occur at the existing Highlands Community Center, located at the Alternative A site. The Schilling Lodge location would be adjacent to the North Tahoe High School and associated outdoor sporting facilities that currently host regular outdoor sporting events.

Regarding operational noise sources, the Project would include a new, small (i.e., 40 horsepower), back-up generator, that would be used periodically for short periods of time for regular testing maintenance and in the event of a power outage. Due to the relatively infrequent use of the generator, this noise source would not be considered a substantial increase in noise. Further, Section 9.36.030 of the Placer County code exempts noise sources from equipment associated with property maintenance, which includes stationary mechanical equipment, provided that noise occurs during the daytime hours. Consistent with typical work hours (e.g., 8:00 a.m. to 5:00 p.m.) maintenance personnel would perform any necessary work during daytime hours, consistent with Placer County code, and people are less sensitive to noise. Thus, the proposed generator would not result in a long-term substantial increase in noise that would exceed an applicable standard.

The last paragraph on page 3.11-16 in Section 3.11, "Utilities," in the Draft EIR is revised to read as follows:

Liberty Utilities and Southwest Gas have indicated there would be adequate supplies and facilities to serve the Project (Custer, pers. comm., 2019; Nelson, pers. comm., 2019). Additionally, before receiving permit approval from TRPA or Placer County, future development would be required to comply with Section 32.6 of the TRPA Code, which requires that a project applicant demonstrate that the project would be served by facilities that have adequate electrical supply. Aside from a new service connection to the new building, no other new electricity or natural gas systems or substantial alterations to energy systems would be required. The new service connections would be constructed within the footprint of the proposed Project site and, thus, the potential environmental effects associated with construction of these service connections are considered as part the analysis of this proposed Project throughout this EIR. The Schilling Lodge would include an approximately 40-horsepower generator that could be used in the event of a power outage. Installation of a generator would occur in compliance with all applicable Placer County or Placer County Air Pollution Control District permits and approvals that would be determined at the time that time the Project submits an application with the County.

The fourth paragraph on page 3.12-7 in Section 3.12, "Energy," in the Draft EIR is revised to read as follows:

Operation of the proposed Project would be typical of nonresidential land uses requiring electricity and natural gas for lighting, space and water heating, appliances, ~~and~~ landscape maintenance activities, and the periodic use of a 40 horsepower generator during power outages. Indirect energy use would include wastewater treatment and solid waste removal at offsite facilities. The proposed Project would increase electricity and natural gas consumption relative to existing conditions, and would require the construction of new utility connections to existing electrical and natural gas facilities supplied by Liberty Utilities and Southwest Gas, respectively. The analysis of energy use also includes the continued operation of the Existing Lodge with some community meetings and recreation classes.

3.3.2 Organizations



advocate | eng Letter
01 eate

July 24, 2020

Tahoe City Public Utility District
 Kim Boyd, Senior Management Analyst
 PO Box 5249, Tahoe City, CA 96145
Submitted via email to kboyd@tcpud.org

Re: Tahoe XC Draft EIR

Ms. Boyd,

The League to Save Lake Tahoe (League) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Tahoe Cross-Country Lodge Replacement and Expansion Project (Project). The League is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we advocate for the implementation of policies contained within regional land use and planning documents, including the Bi-State Compact (Compact), the 2012 Regional Plan Update (Regional Plan) and related Area Plans including the Tahoe Basin Area Plan (TBAP).

O1-1

The League is generally supportive of low-impact development projects and sustainable recreation and two of the reduced-scale Project alternatives could be an example of that. The League identified inadequate analysis and mitigation related to transportation impacts, which would also affect the GHG analysis. We do not believe the traffic analysis captured all the nuances which could result in more significant VMT impacts than assumed. The mitigation measures proposed for the VMT impact are not sufficient. Under current Tahoe Regional Planning Agency (TRPA) and California Senate Bill 743 (SB 743) requirements,¹ this project needs to reduce its VMT impacts to less than significant. The threshold for significance is no increase in VMT. The proposed Project would also not be consistent with the TBAP goal of reducing VMT within the region. **Enhanced and additional mitigation measures with monitoring and reporting are necessary for TCPUD to adopt the environmental findings and for Placer County and TRPA² to approve permits.**

O1-2

Parking and VMT Analysis

The 100-space parking lot in the proposed project would create 54 additional parking spaces. The parking demand analysis does not mention the TBAP formula Implementing Guidelines for the site – “Day Use Areas 1 per every 3 day users.”³ **Based on that formula, how many parking spaces are actually required for the alternatives analyzed in the DEIR?**

O1-3

Maybe more importantly, the League believes the VMT calculations are incomplete and likely underestimate the impact – the parking increase is not included in VMT analysis. While parking availability may be improved temporarily, the additional parking supply is likely to induce demand which will increase daily trips and VMT. We understand the intention is that facility users will park in the new lot instead of on the surrounding residential streets, but there is nothing in the Project design or mitigation measures that provide confidence in this result. In fact, empirical evidence shows that additional off-street parking is directly related to additional VMT. Doctor Donald Shoup has shown

¹ Technical Guidance on Evaluating Transportation Impacts in CEQA (2018). Accessed: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

² Bi-State Compact Article V, (g), pg. 9. Tahoe is currently out of attainment of the VMT threshold.

³ Tahoe Basin Area Plan (TBAP) Implementing Guidelines (2017), pg. 286.

through published research that abundant cheap parking results in more traffic and automobile dependence.⁴ In 2019, the San Francisco Planning Department updated its Transportation Impact Analysis Guidelines with a Memorandum titled "Vehicle Miles Traveled/Induced Automobile Travel".⁵ The memo includes a literature review and its "findings support the conclusion that the provision of off-street parking spaces is associated with additional VMT" (pg. 29). The Tahoe City Lodge DEIR/EIS provides a local example. That project proposed to employ shared parking facilities with the adjacent golf course and clubhouse in order to minimize total parking lot coverage. Based on the analysis in the DEIR/EIS, this measure would also reduce the project's VMT. **Based on the empirical evidence showing the effect of additional off-street parking on trip generation and VMT, the League requests the Traffic Analysis be updated to include the effects of the additional parking.**

O1-3 cont.

Finally, the projected 10% increase in skier visitation is not well supported by data making it seem subjective. The Project Need includes a long list of upgrades to "the only Nordic ski center with a lodge in the Tahoe Region" (DEIR pg. ES-1). It is hard to believe that a project of this scale designed to have a long geographic reach will not attract more than 10% more visitors. **Subjectivity needs to be put aside and a data-based projection needs to be included to accurately estimate increased visitation and the resulting level of impact.**

O1-4

GHG Analysis

The DEIR states that "Because the proposed Project would not be consistent with the Tahoe Basin Area Plan goal of achieving zero net emissions or the goal of reducing VMT within the region, the proposed Project's GHG emissions would contribute to climate change." The GHG emissions are likely higher than projected in the DEIR due to the traffic analysis. **This potentially significant impact can be mitigated by reducing VMT to zero.**

O1-5

Impact and Mitigation

Regardless of the analysis, the proposed Project and Alternative A would result in an increase in daily VMT. Despite this significant impact, almost no mitigation is offered and, under recent California law⁶ and TRPA guidance,⁷ all non-residential projects must produce zero additional VMT. We recognize that these guidelines and requirements were developed during or after the Project DEIR was produced so now is the time to adjust the project in order to mitigate transportation and GHG impacts to less than significant. Despite the level of significance, there is no evidence presented that the mitigation proposed would reduce the Project's VMT by any meaningful amount. Fortunately, the VMT increase is an avoidable impact.

O1-6

There are only two mitigation measures identified to reduce the VMT impact to less than significant (zero VMT) – one of them needs more detail and the other has no effect on VMT. Mitigation Measure 3.5-6a consists of preparing and implementing a Transportation Demand Management Plan (TDM) and provides a few examples of what that might include. The effectiveness of TDM strategies depends on the facility owner and operator and requires dedicated funding, on-going monitoring, and adjusting to be effective. In fact, more details are likely required under CEQA. In *City of Hayward v. Board of Trustees of the California State University*, the First District Court of Appeal found that it is "not sufficient mitigation to simply call for a future study to determine later what is appropriate mitigation. However, an adaptive mitigation program that sets out adequate performance measures

⁴ i.e. *The High Cost of Free Parking* (2005), *Parking and the City* (2018), *Learning from Parking Reforms in Other Cities* (2020), etc.

⁵ https://default.sfplanning.org/publications_reports/TIA_Guidelines_VMT_Memo.pdf

⁶ Technical Guidance on Evaluating Transportation Impacts in CEQA (2018). Accessed: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

⁷ TRPA Interim Project-Level VMT Guidance, currently under development.

can be appropriate and sufficient mitigation. In this case, the EIR included mitigation requiring funding, implementation and monitoring of the TDM Program. The court held the TDM Program did not constitute improperly deferred mitigation because it enumerated specific measures to be evaluated, it incorporated quantitative criteria, and it set specific guidelines for completion of the parking and traffic study and timelines for reporting to the city on the implementation and effectiveness of the measures that will be studied.”⁸ **For this mitigation measure to be considered valid, it must have the aspects described above: performance measures, funding, monitoring, and adaptive management.** The performance measure must be the VMT reduction target that helps reduce the Project’s VMT to zero. Even an updated TDM mitigation measure is not likely to reduce VMT by the amount necessary and additional mitigation measures will be required.

O1-6
cont.

Mitigation Measure 3.5-6b: “Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero” **does not have any effect on the amount of VMT generated by the Project and should not be included as a mitigation measure for VMT impacts.**

O1-7

To effectively reduce the VMT impact, the League recommends additional Project features and VMT mitigation measures such as a parking management (smaller parking lot, creating and enforcing restrictions on on-street parking, parking fees, requiring shared parking with the school for events) and encouraging active transportation (connecting to and creating multi-use paths and sidewalks, enhancing wayfinding and safety, providing more bike parking, etc.). **The mitigation package will require a monitoring and adaptive management plan to ensure results.**

O1-8

The DEIR contains somewhat contradictory statements: (1) “Local roadways providing access to the proposed Project site and Alternative A site do not include bike lanes or sidewalks, and no transit facilities are located in close proximity to the sites” and (2) “The recently completed Dollar Creek shared-use path is located about 350 feet east of the Existing Lodge. This 2.2-mile paved path extends from SR 28 north to a point near the northern terminus of Country Club Drive and connects via crosswalk across SR 28 to the existing Class 1 multi-purpose trail system extending into downtown Tahoe City and beyond.” There is in fact a regionally-connected bike lane very close to the project site that directly links to a transit stop at the future site of up to 174 residential units. There are legitimate safety concerns for cyclists and pretrains using the local roadways leading to and adjacent to the Project area, especially with increased traffic. Bike rental operations exist at the Project site and are expected to increase according to the DEIR. The TBAP Implementing Regulations require bike path connectivity as part of the project⁹ and require the number of short-term bicycle parking spaces be at least 10 percent of the number of required automobile parking spaces.¹⁰ Currently, there does not appear to be any plan for internal bike and pedestrian connectivity, which would help alleviate safety concerns on local roadways, or connect to the existing bike path adjacent to the Project area. Only two bike parking spaces are proposed under all alternatives. **After including these required and recommended active transportation project features and adding monitoring, reporting and adaptive management to the TDM Plan, parking management may provide the remaining VMT reductions and funding needed to implement VMT reduction measures.**

O1-9

⁸ Cox, Castle & Nicholson, LLC interpretation (2012). Accessed: <https://www.coxcastle.com/news-and-publications/2012/court-upholds-eir-against-challenges-to-fire-services-analysis-and-adaptive-mitigation-program>

⁹ TBAP Implementing Guidelines (2017), pg. 247 (2.e.) and pg. 297 2.c.). Accessed: http://www.trpa.org/wp-content/uploads/2017/02/Implementing_Regs_TOC_Linked.pdf

¹⁰ *Ibid.* pg. 284

The term “parking management” encompasses a variety of strategies that improve parking design and management. Historically, parking has been managed through a fairly simple supply and demand model. Parking planning has been changing as principles like induced demand have been incorporated. The old thought is that parking should be abundant and free at most destinations, that parking lots should almost never fill, and that every destination should be responsible for providing parking for every visitor. The new model is to provide optimal parking supply and price and use parking facilities efficiently. Fundamentally, the goal should be to charge users of parking facilities while providing incentives to programs that reduce parking demand. Cost-effective parking management programs can usually reduce parking requirements by 20-40% compared with conventional planning requirements, providing many economic, social and environmental benefits.¹¹ Paid parking is becoming more common even in Tahoe (casinos, Tahoe South Events Center, SR 28 bike path, Town of Truckee, etc.). Pricing parking can be a powerful tool—especially when used in conjunction with other travel demand management strategies—to influence travelers’ decisions about their mode of travel. **The League recommends parking demand management including “right-sizing” off-street parking, charging for parking with a dynamic fee structure, and working with Placer County to implement neighborhood parking policies such as eliminating or severely limiting on-street parking in the neighborhoods surrounding the Project area.**

O1-10

Project Alternatives

Along with, or as part of, the additional VMT mitigation we recommend, environmental impacts could be significantly decreased by selecting a different alternative analyzed in the DEIR. An alternative such as Alternative D-Reduced Project or Site A-Modified Project would likely reduce the amount of parking management necessary. If increased free off-street parking without restricting on-street neighborhood parking does in fact generate more VMT, reduced parking would then reduce VMT. Site A may make it easier to provide internal bike and pedestrian trails and link to the existing multi-use trail. **The League would like to see a reduced-size alternative selected brought to the Final EIR.**

O1-11

While CEQA requires mitigation monitoring or reporting, to prove that VMT mitigation is effective, the League encourages TCPUD as the lead agency to choose to do both, working with TCCSEA. We also encourage TCPUD and TCCSEA to include adaptive management in the Monitoring and Reporting Plan.

O1-12

Thank you for considering our comments and please do not hesitate to reach out to me directly with any questions. We look forward to seeing requested changes reflected in the project selected to move forward in the Final EIR.

O1-13

Sincerely,



Gavin Feiger
Senior Policy Analyst

¹¹ Victoria Transport Policy Institute (2016), *Parking Management Strategies, Evaluation and Planning*. Accessed: https://www.vtpi.org/park_man.pdf

Letter O1 Gavin Feiger, Senior Land Use Policy Analyst

League to Save Lake Tahoe

July 6, 2020

Response O1-1

The comment provides background information about the commenter and an introduction to the letter.

Response O1-2

The comment takes issue with the VMT analysis in the Draft EIR, suggesting that VMT impacts could be greater than identified, the threshold of significance for VMT should be no increase in VMT, the Project is inconsistent with an Area Plan goal related to VMT, and concludes that additional mitigation and monitoring would be necessary. These comments are each addressed, in turn, below.

As detailed on page 3.5-18 in Section 3.5, "Transportation," of the Draft EIR, language in the updated State CEQA Guidelines associated with the implementation of SB 743 indicates that lead agencies have an opt-in period until July 1, 2020 to implement the updated guidelines. The Draft EIR was circulated for public review prior to July 1, 2020 (i.e., June 5, 2020); thus, the Draft EIR is not required to consider VMT according to the updated State CEQA Guidelines under California Code of Regulations (CCR) Section 15064.3, "Determining the Significance of Transportation Impacts." Additionally, as detailed on page 3.5-18 in Section 3.5, "Transportation," of the Draft EIR, the VMT analysis in the Draft EIR is included for TRPA informational purposes only and is not meant to address State CEQA Guidelines Section 15064.3, Subdivision (b).

The comment states that the Area Plan contains a goal of reducing VMT in the region. This statement is incorrect. The commenter may be referring to policy AQ-P-4, Prioritize projects and services that reduce vehicle miles travelled (VMT) and support alternative modes of transportation, or the finding in the Area Plan EIR/EIS that implementation of the Area Plan as a whole would reduce VMT. No further response is necessary.

Further, as described on page 3.5-19 of the Draft EIR, TRPA is in the process of updating and validating its transportation model and updating its VMT Threshold Standard; and thus, the VMT analysis in the Draft EIR is based on current TRPA interim guidance for assessing VMT impacts. As listed in the final bullet point on page 3.5-19 of Section 3.5, "Transportation," in the Draft EIR, VMT related impacts would be significant if the Project would result in an unmitigated increase in daily VMT. This VMT threshold was confirmed with TRPA staff in preparing the Draft EIR and reaffirmed with staff (Marshall, pers. comm., 2020) in preparation of this Final EIR as the appropriate significance threshold to apply to the Project at this time. Neither TRPA nor Placer County has adopted "no net increase" as a threshold of significance for VMT. Under the interim approach recommended by TRPA, a net increase in VMT is not considered significant if the project incorporates mitigation measures to reduce daily VMT. Under this approach, the mitigation measures are not required to reduce the net change in VMT to zero. This approach is analogous to the requirement to implement "best management practices," a concept that has been applied in a variety of other contexts (e.g., stormwater runoff) to determine whether a project's impacts would be significant. In this case, if a project would result in a net increase in VMT, but incorporates best management practices to reduce VMT, then the project's VMT impacts are not considered significant. This approach is consistent with State CEQA Guidelines Section 15064.3, which states that an agency may consider a project's proximity to transit, a project's qualitative characteristics, or other factors, in determining whether a project's VMT impacts are significant. It is recognized that TRPA and/or Placer County may adopt a quantitative significance threshold for VMT at some point in the future. At this time, however, such a threshold has not been adopted by either agency. CEQA does not require that an agency adopt a particular threshold, such as "no net increase." For these reasons, the statement within the comment that the threshold of significance is a no net increase in VMT is inaccurate.

See response to comment A2-6 as it relates to the portion of the comment stating a need for additional TDM measures, including monitoring and reporting. Based on response to comment A2-6 and the associated changes to the DEIR no further response is necessary. Additionally, the portion of the comment related to Placer County and TRPA approvals does not raise any CEQA issues or address the adequacy of the EIR analysis; and thus, no further response is necessary.

See response to comment O1-3 regarding the accuracy of the VMT calculations.

Response O1-3

The comment raises questions about the parking demand and impact analysis, references Area Plan parking standards and published research on parking, and requests that the VMT analysis be updated to include the effects of added parking.

The Area Plan Implementing Regulations contains a parking demand table for the purpose of estimating the minimum and maximum parking demand of uses in the Area Plan. However, the Area Plan Implementing Regulations also state that in lieu of the parking demand table, an applicant may submit for TRPA and County approval a technically adequate parking analysis (Placer County and TRPA 2017). A detailed analysis of parking supply and demand is contained within Section 6, "Parking Analysis," of Appendix D in the Draft EIR. The aforementioned parking analysis evaluates the current demand of the Existing Lodge and determines the capacity needed for the proposed Project. In evaluating the parking needs of a specific site, it is usually desirable to use data collected at that site, if available. This is supported by the Institute of Transportation Engineers (ITE) in its Parking Generation manual, which states that a survey of a site in a comparable local condition should always be considered as one potential means to estimate parking demand (Hooper 2019). Given that site-specific parking data is available, and it is necessary to analyze hourly parking demand for this Project, the parking rate in the Area Plan is not utilized. Consistent with the Area Plan Implementing Regulations, the parking analysis would be submitted for TRPA and County approval during the development review and permitting processes. Additionally, it should be noted that offsite parking for the Existing Lodge is currently allowed under an existing permit from the County, which allows for parking along the neighborhood streets in specific areas and depending on how cars are parked, the area can hold up to about 50 cars. This parking capacity is in addition to the 46 marked parking spaces in the existing parking lot at the Highlands Community Center. Therefore, if the existing on-street County parking permit is not renewed, the number of permitted parking spaces would only differ by four spaces (i.e., 96 versus 100 parking spaces). On peak days when parking demand exceeds the parking lot limit, visitors could be directed to park at the Existing Lodge.

As stated on page 3.5-12 of the Draft EIR, trip generation at a ski area or trailhead is typically a function of the skiable terrain, snow conditions, and skier capacity. The Project would not alter the terrain or skier capacity; however, the analysis takes the conservative approach of assuming that skier visitation during winter conditions would increase by 10 percent, which accounts for baseline growth trends for Nordic skiing as a recreational opportunity. Therefore, the number of skiers expected to visit the site is expected to slightly increase over time compared to the number of skiers that currently travel to the Existing Lodge. Additionally, the Existing Lodge currently provides onsite parking and is permitted an additional 50 offsite parking spaces allowed by an existing County permit. The traffic analysis and trip generation used in the Draft EIR accounts for any induced demand associated with parking conditions through the use of collected data on visitation and parking, which inherently accounts for any effect of parking supply and demand on trip generation because the existing and proposed parking is both free and readily available.

The comment does not provide evidence that the finding in the "Vehicle Miles Traveled/Induced Automobile Travel," memorandum completed for the City of San Francisco, is applicable to this Project and the surrounding setting. The San Francisco Planning Department's memorandum addresses a dense urban environment, with a regional downtown shopping/office area served by abundant existing transit from throughout the region (buses, ferries, trains, light rail). That context is dissimilar to the characteristics of the Project site. Additionally, as detailed on page 3.5-18 of the Draft EIR, the parking analysis evaluates the current demand of the Existing Lodge and determines the capacity needed at the Schilling Lodge; thus, minimizing parking spillover on adjacent neighborhood streets. This approach strikes a balance between minimizing onsite parking while ensuring that sufficient capacity exists as to not inconvenience nearby residents with Project visitors having to park on the surrounding residential streets. Additionally, the comment provides no evidence for the assertion that facility users would park on the surrounding residential streets instead of in the new parking lot. Parking on residential streets is typically restricted during the winter except in areas that have a permit for on-street parking. Therefore, no further response is necessary.

Response O1-4

The comment questions the Draft EIR's approach of assuming an increase of up to 10 percent in skier visitation, suggests the increase could be higher. As stated on page 3.5-12 of the Draft EIR, trip generation at a ski area or trailhead is typically a function of the skiable terrain, snow conditions, and skier capacity rather than lodge amenities. However, while the Project would not alter the terrain or skier capacity, the analysis in the Draft EIR assumes skier visitation during winter conditions would increase by 10 percent. This conservative increase is a factor of skier visitation data captured since 2005/06, climate change indicators, and national Nordic skiing trends. See response to comment O1-3, which acknowledges the traffic analysis and trip generation used in the Draft EIR accounts for any induced demand associated with parking conditions. Therefore, as described above, the analysis of transportation impacts in the Draft EIR is conservative based on substantial evidence, including data collected and modeled for a typical busy day at Tahoe XC. The comment does not provide information showing the increase could be higher than 10 percent, and no information supporting this contention has been found based on independent review of available guidance. Accordingly, whether the increase would be more than 10 percent is therefore speculative.

Response O1-5

The comment states that the GHG emissions estimated for the Project are likely higher because of the traffic analysis, but does not indicate what aspect or component of the traffic analysis would support such an assertion. The GHG analysis estimates annual operational emissions associated with projected annual VMT using the same traffic data that was used in Section 3.5, "Transportation." The traffic data and analysis have been reviewed in light of this comment and are considered reasonable. The comment also states the potentially significant impact determination made in Section 3.7, "Greenhouse Gas Emissions and Climate Change," could be mitigated by reducing VMT to zero. As stated on page 3.7-16, the Impact 3.7-1 conclusion for the proposed Project does not rely solely on the ability to reduce VMT:

Because the proposed Project would not be consistent with the Tahoe Basin Area Plan goal of achieving zero net emissions or the goal of reducing VMT within the region, the proposed Project's GHG emissions would contribute to climate change.

Operational emissions (e.g., electricity usage, natural gas combustion, water usage, wastewater and solid waste generation, and area sources such as landscaping equipment) in combination with the increase in VMT contribute to the potentially significant impact related to GHG emissions. Thus, Mitigation Measures 3.7-1a includes a list of measures that would achieve GHG emission reductions associated with operations at the Schilling Lodge. Elements of Mitigation Measure 3.7-1a would also reduce VMT. For instance, Mitigation Measure 3.7-1a recommends the use of dedicated onsite parking for shared vehicles, which would reduce VMT associated with Project operations. As discussed in Section 3.7, "Greenhouse Gas Emissions and Climate Change," implementation of the components of Mitigation Measure 3.7-1a would reduce GHG emissions to zero through the use of all feasible onsite GHG reduction measures, followed by the purchase of carbon credits as required by Mitigation Measure 3.7-1b. As described under Impact 3.6-2 on page 3.6-16 of the Draft EIR, air quality impacts of the proposed Project and Alternative A would be further reduced through payment of an air quality mitigation fee consistent with TRPA Code Section 65.2. The air quality mitigation funds are used to fund projects that offset the air quality of impacts of development throughout the Basin. The combination of implementing Mitigation Measures 3.7-1a and 3.7-1b and payment of air quality mitigation fees would contribute to reducing GHG emissions.

Response O1-6

The comment suggests that under recent SB 743 and TRPA guidance, all non-residential projects must produce zero additional VMT, and questions the efficacy of VMT mitigation.

The suggestion that all non-residential projects must produce zero additional VMT is incorrect. As detailed in response to comment O1-2, the Draft EIR was circulated for public review prior to July 1, 2020 (i.e., beginning on June 5, 2020); and thus, the Draft EIR is not required to consider VMT pursuant to the updated State CEQA Guidelines Section 15064.3, "Determining the Significance of Transportation Impacts." Additionally, as detailed in response to comment O1-2, the no net increase significance threshold referenced in the comment is inaccurate. See response to comment O1-2 for additional details.

The comment also questions the efficacy of mitigation measures to reduce VMT. As detailed in response to comment A2-6, the TDM plan is required as part of the development review process, would be developed and submitted to the County subsequent to the release of the Final EIR, and is considered part of the Project. Revisions related to Mitigation Measure 3.5-6a in the Draft EIR are detailed in response to comment A2-6 above. Additionally, implementation of Mitigation Measure 3.5-6b (revised as Mitigation Measure 3.5-6 in response to comment A2-6) on page 3.5-31 of the Draft EIR would ensure that no matter what VMT reduction the TDM plan is able to achieve, all GHG emissions associated with construction and operation of the Project would be reduced to zero; thus, ensuring GHG emissions associated with VMT are mitigated to a less-than-significant level. As described above in response to comment O1-5, the applicant would also be required to pay air quality mitigation fees in accordance with TRPA Code Section 65.2, which would contribute to reducing air pollutant emissions in the Tahoe Basin.

The Project would also be required, in accordance with TRPA Code Section 65.5.2.A, to encourage ridesharing and use of alternative commute modes by providing information about available transit, bike routes, and ridesharing. Because TCCSEA/Tahoe XC employs fewer than 100 employees, it is not required to prepare an Employer Transportation Plan (see TRPA Code Section 65.5.2.B). However, as detailed in response to comment A2-4 and the associated revisions made to page 3.5-4 of the Draft EIR detailed above, the Project is committed to reducing Project-generated VMT to the maximum degree feasible through implementation of the TDM plan to be developed during the development review process. Therefore, although not required to prepare an Employer Transportation Plan, the Project could implement similar measures if deemed feasible and effective. Additionally, all TDM strategies are intended to be flexible to adjust over time to address gaps and improve effectiveness; and thus, as detailed in Appendix A, the TDM plan would establish a monitoring process to ensure a responsive, effective, and evolving program that would reduce VMT to the extent feasible.

Finally, with respect to the comment's statement about an adaptive mitigation program, CEQA and the State CEQA Guidelines (Public Resources Code Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the Project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for the Project because the EIR identifies potentially significant adverse impacts related to Project implementation, and mitigation measures have been identified to reduce those impacts. The MMRP is available under separate cover from this Final EIR. Because of the size and nature of the Project, an adaptive management plan is not necessary. That said, the TDM plan developed as part of the development review process may include adaptive elements and would likely include a monitoring component for the applicant and/or the County.

Response O1-7

The comment takes issue with Mitigation Measure 3.5-6b in Section 3.5, "Transportation," of the Draft EIR, alleging that it would not reduce VMT.

As detailed in response to comment O1-2, the VMT analysis in the Draft EIR is based on current TRPA interim guidance for assessing VMT impacts and the Project-related VMT impact would be significant if it would result in an unmitigated increase in daily VMT. Additionally, as stated on page 3.5-18 of Section 3.5, "Transportation," in the Draft EIR, TRPA's interim guidance recognizes that "while the stated purpose for the VMT threshold has been achieved many times over through vehicle tailpipe nitrogen emission reductions, VMT remains an important performance measure in efforts to reduce greenhouse gases and effectuate TRPA and state policies." Additionally, it is stated that in evaluating VMT impacts of a project, TRPA notes that VMT is an important performance measure for efforts to reduce GHG emissions. Therefore, no change to the transportation analysis or Mitigation Measure 3.5-6b (revised as Mitigation Measure 3.5-6 in response to comment A2-6) in Section 3.5, "Transportation," of the Draft EIR is needed.

Response O1-8

The comment recommends additional Project features and VMT mitigation measures such as a parking management (e.g., smaller parking lot, creating and enforcing restrictions on on-street parking, parking fees, requiring shared parking with the school for events) and encouraging active transportation (connecting to and creating multi-use

paths and sidewalks, enhancing wayfinding and safety, providing more bike parking, etc.), along with a monitoring and adaptive management plan.

As noted in response to comment A2-4 and the associated revisions made to page 3.5-4 of the Draft EIR detailed above, additional TDM measures identified as potentially feasible in the TDM plan assessment (included as Appendix A to this Final EIR) could be incorporated into the Project. The TDM measures to be considered during development of the TDM plan now include the parking management and active transportation strategies detailed in the comment. Additionally, associated revisions made to page 3.5-4 of the Draft EIR (see response to comment A2-4) state that the TDM plan would reduce Project-generated VMT to the maximum degree feasible. Response to comment A2-6 discusses preparation of a TDM plan as part of the development review process and the TDM measure assessment included as Appendix A to this Final EIR. As detailed in response to comment O1-6, the TDM plan would establish a monitoring process to ensure a responsive, effective, and evolving program.

As noted in response to comment O1-7, TRPA considers the corresponding GHG emissions when evaluating VMT impacts of a project. Additionally, as detailed in response to comment O1-6 above, implementation of Mitigation Measure 3.5-6b (revised as Mitigation Measure 3.5-6 in response to comment A2-6) on page 3.5-31 of the Draft EIR would ensure that no matter what VMT reduction the TDM plan is able to achieve, all GHG emissions associated with construction and operation of the Project would be reduced to zero; thus, ensuring the VMT impact is mitigated to a less-than-significant level. The MMRP and TDM plan would include ongoing monitoring and would include opportunities for adaptive management.

Response O1-9

The comment quotes two statements in the Draft EIR related to existing bicycle, pedestrian, and transit facilities in the area, and suggests that these statements are "somewhat contradictory." The statements address different issues and are not contradictory. The first statement describes conditions as they relate to such facilities along roadways, while the second statement quoted pertains to the off-street trail system. Both statements accurately describe the existing setting.

The comment suggests that the Area Plan Implementing Regulations require bike path connectivity as part of the Project and require the number of short-term bicycle parking spaces be at least 10 percent of the number of required automobile parking spaces. The Area Plan Implementing Regulations state that if a site abuts public open spaces, including multi-use paths, the provision of clear and direct access to the public use or path is required. In this case, the Project does not abut an existing bike path and thus would not require such a connection. The Project as proposed would comply with the short-term bicycle parking space requirement. For clarity, Table 2-2 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," is revised in this Final EIR to clarify the proposed amount of bicycle parking by expressing the bicycle parking in bike spaces instead of bike racks. These changes are presented above under response to comment A2-5 and in Chapter 2, "Revisions to the Draft EIR." The clarification does not alter the conclusions with respect to the significance of any environmental impact.

The comment states that a plan for internal bike and pedestrian connectivity would help alleviate safety concerns on local roadways, but does not provide evidence to contradict the transportation safety analysis in the Draft EIR. The proposed Project site and Alternative A site are accessible to pedestrians and bicyclists, including from the nearby trail system that connects to these sites and from Polaris Road and Country Club Drive. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project. See also Master Response 1: Transportation Safety for a response to the safety related aspects of the comment.

Finally, the comment suggests that parking management, in addition to the recommended active transportation project features, monitoring, reporting, and adaptive management may provide the remaining VMT reductions and funding needed to implement VMT reduction measures. As detailed in response to comment A2-6, the TDM plan is required as part of the development review process; and thus, would be developed and submitted to the County subsequent to the release of the Final EIR and is considered part of the Project. In addition, an expanded TDM Plan is required under Area Plan Mitigation Measure 10-1d. Revisions related to Mitigation Measure 3.5-6a in the Draft EIR are detailed in response to comment A2-6, above. Implementation of Mitigation Measure 3.5-6b (revised as Mitigation Measure 3.5-6 in response to comment A2-6) on page 3.5-31 of the Draft EIR would ensure that no matter

what VMT reduction the TDM plan is able to achieve, all GHG emissions associated with construction and operation of the Project would be reduced to zero; thus, ensuring the VMT impact is mitigated to a less-than-significant level. Also see response to comment O1-3, which addresses the parking analysis in the Draft EIR.

Response O1-10

The comment describes the term “parking management” and the evolution of parking planning. The comment suggests that pricing parking can be a powerful tool—especially when used in conjunction with other travel demand management strategies—to influence travelers’ decisions about their mode of travel. The comment recommends parking demand management including “right-sizing” off-street parking, charging for parking with a dynamic fee structure, and working with Placer County to implement neighborhood parking policies such as eliminating or severely limiting on-street parking in the neighborhoods surrounding the Project area. See response to comment O1-3, which addresses the parking analysis in the Draft EIR.

While the comment is correct that parking management (i.e., restriction on parking availability, parking fees, etc.) can result in reductions in automobile use, this is only true for persons making trips that can feasibly shift to other travel modes. In this particular case, there are several factors that limit the potential for parking management to reduce automobile use. First, neither the proposed Project site nor the Alternative A site are served directly by public transit. Both sites are located more than 0.5 mile and are topographically separated from the nearest bus stop, which indicates that any shift to transit associated with the implementation of parking management strategies would be minimal. Additionally, for the primary season of facility use (winter), walking or biking is not a feasible option for persons not living in the immediate vicinity of either site. In winter, the seasonal prohibition on on-street parking already constrains parking availability. Finally, unlike the larger downhill ski resorts, the times that users travel to and from the existing Tahoe XC facility tend to be spread over a broader period of the day (rather than concentrated in the early a.m. and late p.m. periods) and users are more dispersed over a larger area. Therefore, both of these factors reduce the potential for carpooling to reduce automobile use.

A parking management program can also have unintended consequences in the form of “spillover parking” into other areas and impacts on other residents. Both the proposed and Alternative A sites are located within largely residential areas; and thus, charging for parking and/or providing insufficient onsite parking would likely result in facility users parking along nearby residential streets. This in turn would require restrictions to on-street parking and ongoing enforcement (and the potential for more remote parking along streets just beyond wherever the parking restrictions terminate). To avoid restricting parking year-round for nearby residents, a parking permit program would be required to be established and managed. This program would generate ongoing costs and would be an inconvenience to nearby residents that would be required to obtain parking permits for themselves and guests. As Placer County does not have any existing parking management programs, this would require establishing a new program with no existing potential to share staff or costs. Therefore, the implementation of these aforementioned strategies in this specific location would result in monetary costs and neighborhood impacts with little potential to meaningfully reduce auto use. See Appendix A of this Final EIR, which further discusses the feasibility of including parking management strategies in the TDM plan for the Project. Finally, the comment does not address the adequacy of the Draft EIR analysis. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response O1-11

The comment recommends the Alternative D – Reduced Project alternative or Site A – Modified Project alternative because they would likely reduce available parking, and thus VMT, as compared to the proposed Project. The comment suggests that Site A may make it easier to provide internal bike and pedestrian trails and link to the existing multi-use trail and that the League would like to see a reduced-size alternative selected brought to the Final EIR.

As detailed in response to comment A2-6 above, the TDM plan is required as part of the development review process; and thus, the TDM plan would be developed and submitted to the County subsequent to the release of the Final EIR and is considered part of the Project. Additionally, as detailed in response to comment O1-6 above, implementation of Mitigation Measure 3.5-6b (revised as Mitigation Measure 3.5-6 in response to comment A2-6) on page 3.5-31 of the Draft EIR would ensure that no matter what VMT reduction the TDM plan is able to achieve, all

GHG emissions associated with construction and operation of the Project would be reduced to zero; thus, ensuring the VMT impact is mitigated to a less-than-significant level. A reduced-size alternative, or an alternative with reduced parking, would not avoid a significant impact caused by the proposed Project. As further discussed in response to comment I10-18, several reduced-size alternatives, including reduced number of parking spaces, were considered in the Draft EIR and were determined to not meet all of the Project objectives. Therefore, no further response is necessary. The League's preference for a reduced-size alternative is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response O1-12

The comment notes that although CEQA requires mitigation monitoring or reporting, the comment encourages TCPUD and TCCSEA to include adaptive management in the monitoring and reporting plan. See responses to comments O1-2, O1-6, O1-8, O1-9, which explain why the MMRP would not specifically include an adaptive management component but that the TDM plan developed during the development review process would require monitoring by the applicant and/or the County and would provide opportunities for adaptive management. Additionally, the MMRP itself requires monitoring the implementation of mitigation for the Project.

Response O1-13

The comment includes closing remarks for the letter.

3.3.3 Individuals

Letter
I1

From: Huff
To: Kim Boyd
Cc: normski@pacbell.net; ravgarland2@gmail.com; Judy Friedman; Dan Wilkins; Sean Barclay; Terri Viehmann
Subject: Re: Tahoe XC Lodge Replacement and Expansion Project - Notice of Availability for Public Draft EIR
Date: Friday, June 05, 2020 1:48:50 PM
Attachments: Tahoe XC NOA_Final_06032020.pdf

Thanks, Kim.

I shared your email with other residents, and almost immediately got the following request:

"Would the TCPUD please provide the DEIR in a more coherent format. The number and sizes of its separate .pdf file segments make it extremely difficult to share electronically."

I1-1

Have a nice weekend,
Roger

In a message dated 6/5/2020 9:07:42 AM Pacific Standard Time, kboyd@tcpud.org writes:

Dear Interested Party,

The TCPUD has completed the Draft Environmental Impact Report (DEIR) for the proposed

Tahoe Cross-Country Lodge Replacement and Expansion Project (Project). The Project website has been updated and you will find the DEIR and all supporting documents at: <https://www.tcpud.org/capital-improvement-projects/tahoe-cross-country-lodge-replacement-and-expansion>.

Attached you will find the Notice of Availability. This document contains important information regarding the availability of the document, including information about comment submission and meeting dates. It has been sent to all interested parties who have requested notice, live within the Highlands Community, or provided comments on the Notice of Preparation of the DEIR.

We encourage your continued participation in this process. The DEIR is available at the link noted above for public review and comment beginning on June 5, 2020. All comments should be submitted on or before July 24, 2020. Written comments may be sent by postal or electronic mail to:

Tahoe City Public Utility District

Kim Boyd, Senior Management Analyst

P.O. Box 5249, Tahoe City, CA 96145

Email: kboyd@tcpud.org (Subject Line: Tahoe XC Draft EIR)

A Public Meeting has been scheduled for Friday July 17, 2020 at 9:00 a.m. to allow individuals to provide oral comments on the DEIR. This meeting will occur during a regularly scheduled TCPUD Board meeting. Please refer to the meeting agenda posted the week prior to the meeting for updated information on participation details at the following link: <https://www.tcpud.org/your-district/board-directors/boardcommittee-agendas-and-minutes>

Please contact me at 530-580-6286 or kboyd@tcpud.org should you have any questions.

Thank you,

Kim Boyd

Senior Management Analyst

Tahoe City Public Utility District

530.580.6286 Direct

530.583.3796 Main Office ext. 386

www.tcpud.org

Letter I1 Roger Huff

June 5, 2020

Response I1-1

The comment requests that the Draft EIR files provided on the TCPUD website be provided in a different format and expresses that it is difficult to share the files because of their sizes and that they are separate files. The files were provided in this manner as each chapter or resource section of the Draft EIR is in its own file. Additionally, the complete document was provided as a single file. A paper copy was also made available for review outside of the TCPUD offices in Tahoe City. At the time the Draft EIR was released, public facilities, including libraries, were not open to the public due to the COVID-19 pandemic emergency; thus, additional paper copies of the Draft EIR could not be provided at multiple locations. TCPUD made a reasonable effort to make the Draft EIR readily available in different formats for public review. The comment does not provide any specific alternative suggestions for how the files could be made available. No further response is required.

Letter 12

From: [Marguerite Sprague](#)
To: [Kim Boyd](#)
Subject: Re: Tahoe XC Lodge Replacement and Expansion Project - Notice of Availability for Public Draft EIR
Date: Monday, June 08, 2020 10:01:31 AM

Argh! I thought I discarded that message, sorry. Roger Huff sent out a working link so I'm good to go.

The error came off the link in your first email, if that's any help.

Ah the joys of tech: more confusion at faster paces ;)

Thanks again.

Sent from my phone; pls xcus brevity & typos!

On Jun 8, 2020, at 9:47 AM, Kim Boyd <kboyd@tcpud.org> wrote:

Hi Marguerite,

I'm sorry you are having trouble with the link. I've provided the link again here:

<https://www.tcpud.org/capital-improvement-projects/tahoe-cross-country-lodge-replacement-and-expansion>

Both our IT manager and myself have tried the link from out of office computers and they are working correctly for us. If the link continues to not work correctly for you, you can access it directly through our website at www.tcpud.org. Once on our main page, click on 'Capital Improvement Projects' and then 'Tahoe Cross Country Lodge. From there, you should have access to all the documents.

Please let me know if you continue to have trouble.

Thanks,
Kim

Tahoe City - Public Utility District

The new Bunker Water Tank was officially connected to the Tahoe City water system in November 2018. The Tahoe City Winter Sports Park is open for another snowy winter season in downtown Tahoe City. Winter weather is here and to protect your home and keep your water flowing, be water wise and winterize. The TCPUD Parks and Recreation Department ...

I2-1

www.tcpud.org

From: Marguerite Sprague <mshtahoe@gmail.com>
Sent: Monday, June 8, 2020 8:49 AM
To: Kim Boyd <kboyd@tcpud.org>
Subject: Re: Tahoe XC Lodge Replacement and Expansion Project - Notice of Availability for Public Draft EIR

I2-1
cont.

Hi again Kim:

This link to the document doesn't appear to work, I get a 404 error message (image of page attached).

regards,
Marguerite Sprague

On Fri, Jun 5, 2020 at 9:07 AM Kim Boyd <kboyd@tcpud.org> wrote:

Dear Interested Party,

The TCPUD has completed the Draft Environmental Impact Report (DEIR) for the proposed

Tahoe Cross-Country Lodge Replacement and Expansion Project (Project). The Project website has been updated and you will find the DEIR and all supporting documents at: <https://www.tcpud.org/capital-improvement-projects/tahoe-cross-country-lodge-replacement-and-expansion>.

Attached you will find the Notice of Availability. This document contains important information regarding the availability of the document, including information about comment submission and meeting dates. It has been sent to all interested parties who have requested notice, live within the Highlands Community, or provided comments on the Notice of Preparation of the DEIR.

We encourage your continued participation in this process. The DEIR is available at the link noted above for public review and comment beginning on June 5, 2020. All comments should be submitted on or before July 24, 2020. Written comments may be sent by postal or electronic mail to:

Tahoe City Public Utility District

Kim Boyd, Senior Management Analyst

P.O. Box 5249, Tahoe City, CA 96145

Email: kboyd@tcpud.org (Subject Line: Tahoe XC Draft EIR)

A Public Meeting has been scheduled for Friday July 17, 2020 at 9:00 a.m. to allow individuals to provide oral comments on the DEIR. This meeting will occur during a regularly scheduled TCPUD Board meeting. Please refer to the meeting agenda posted the week prior to the meeting for updated information on participation details at the following link: <https://www.tcpud.org/your-district/board-directors/boardcommittee-agendas-and-minutes>

Please contact me at 530-580-6286 or kboyd@tcpud.org should you have any questions.

Thank you,

Kim Boyd

Senior Management Analyst

Tahoe City Public Utility District

530.580.6286 Direct

530.583.3796 Main Office ext. 386

www.tcpud.org

<image003.jpg>

Letter I2

Marguerite Sprague

June 8, 2020

Response I2-1

The comment includes communication between the author of the comment letter and TCPUD regarding access to the Draft EIR files on the TCPUD website. The comment acknowledges that they were ultimately successful in accessing the files on the website. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. No further response is required.

**Letter
I3**

From: [joe.hennessey](#)
To: [Kim.Boyd](#)
Subject: Tahoe XC Lodge
Date: Monday, June 08, 2020 10:13:15 AM

Kim,

Please accept my comment of concern in moving entrance / access to Tahoe XC via Polaris Rd.

My family drives this road daily, sometimes 4-6 times per day as my child attends school at the end of this road.
Morning, afternoon and sometimes mid school day to volunteer.

Traffic is already high on this road, and children are also walking to and from both schools.
In the afternoon athletes run this street.

In my humble opinion, adding traffic to and from the XC center is an accident waiting to happen.

Please add my comments to your public record during the study period of this proposed move for the center.

Best,
Joe Hennessey
[530-386-2867](tel:530-386-2867)

I3-1

Letter I3 Joe Hennessey
June 8, 2020

Response I3-1

The comment expresses concern that the Project would move the entrance/access point to Polaris Road. The comment states that due to existing traffic volumes along this roadway and pedestrians using this roadway to access the nearby schools, the addition of Project-generated traffic to this roadway will result in unsafe pedestrian conditions.

Please see Master Response 1: Transportation Safety. The comment does not provide any data or evidence to contradict the conclusions of the transportation analysis related to roadway safety in the Draft EIR. Therefore, no further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Alex Lesser](#)
To: [Kim Boyd](#)
Subject: Re: Tahoe XC Lodge Replacement and Expansion Project - Notice of Availability for Public Draft EIR
Date: Monday, June 08, 2020 8:54:55 PM
Attachments: [Tahoe XC NOA Final_06032020.pdf](#)

**Letter
I4**

Kim

I'd also like to voice my concern that that July 17 date for Public Meeting and the July 24 Public Comment deadline seem completely unreasonable given the current pandemic and social issues. This process has been almost two years to get to this point. Can you push the dates back 30 days each? That certainly won't change any significant timelines.

I4-1

Thank you

Alex
www.pssclabs.com

Letter I4 Alex Lesser

June 9, 2020

Response I4-1

The comment requests that the July 17 public meeting and July 24 public comment deadline be pushed back and expresses the belief that these deadlines are unreasonable given the current pandemic and social issues. As noted in Section 1.2, "Public Review Process," of this Final EIR, the Draft EIR was circulated for a 50-day public review and comment period. State CEQA Guidelines Section 15105(a) states that the public review period shall not be less than 45 days. Thus, the public review period for the Draft EIR exceeds the minimum review period requirements. The Draft EIR was released on June 5, 2020, providing 43 days for the public to review the document prior to the July 17 meeting, with an additional 7 days for the public to review the document until the comment close date of July 24. The 50 days provided for public review was greater than the minimum length for public review of a Draft EIR. By the close of the review period, TCPUD received 80 comment letters on the Draft EIR. The public comment review period was not further extended in response to this comment for these reasons and because it is generally expected that this amount of time would be sufficient for someone in the general public to access, review, and provide comment on the Draft EIR.

Letter I5

From: Huff
To: Judy Friedman; Dan Wilkins; John Pang; Scott Zumwalt; Gail Scoville; Sean Barclay; Kim Boyd; Terri Viehmann
Cc: normski@pacbell.net; raygarland2@gmail.com
Subject: URGENT REQUEST TO RELAX THE DEIR PUBLIC REVIEW SCHEDULE
Date: Wednesday, June 10, 2020 10:29:36 AM

Dear Board Members,

The consolidated version of this Draft Environmental Impact Report (DEIR): contains 831 pages of narrative, graphics, and data tables, lacks a readily apparent access link on the District’s Web site, and public access to a paper copy is apparently limited to one outside your Administrative office during weekday work hours.

The current 17 July public meeting and 24 July written comment submission deadline do not provide sufficient time for members of our community to: access, review, compile, and submit comments on this large and complex document; and the State Web site (see <http://opr.ca.gov>) clearly states that, “CEQA establishes a floor and not a ceiling for public review and comment periods. Lead and responsible agencies may use their discretion to extend such time periods to allow for additional public review and comment.”

You are therefore urgently requested to relax the schedules for both the Public Meeting and written comment submission deadline by at least thirty (30) more days to prevent any further damage to the credibility of this already controversial and divisive project.

Very sincerely,

Roger Huff

I5-1

Letter I5 Roger Huff

June 10, 2020

Response I5-1

The comment notes the length and content of the Draft EIR, their challenge with accessing the document online or the paper copy at the TCPUD offices. The comment expresses that the July 17 public meeting date and July 24 public review deadline do not provide sufficient time to access, review, compile, and submit comments on the Draft EIR. The comment also notes that the Office of Planning and Research website states that CEQA establishes a minimum requirement for public review and lead agencies may use their discretion to extend the review time period. The comment requests the schedule for the public meeting and public comment deadline be relaxed. See responses to comments I1-1 and I4-1 that address concerns related to access to the Draft EIR document and the time period for public review of the Draft EIR.

From: [Huff](#)
To: [Kim Boyd](#)
Subject: RESIDENTS QUESTIONS
Date: Thursday, June 11, 2020 6:01:44 AM

**Letter
I6**

Good Morning Kim,
 Please email me the answers to the following residents questions so that I can disseminate the information:

(1) Can the TCPUD spaces accommodate all interested parties with the required social distancing for a July 17th Public Meeting?

(2) Can members of the public bring Powerpoint slides on thumb drives to augment their Oral comments during the meeting?

Thanks and have a nice day,
 Roger

I6-1

Letter I6 Roger Huff
 June 11, 2020

Response I6-1

The comment asks if the public meeting space on July 17 would provide sufficient space to allow for social distancing by attendees and if members of the public could bring PowerPoint slides on thumb drives to augment their oral comments. The public meeting was held as a virtual meeting; thus, there was no need to ensure space for social distancing. Oral comments were accepted during the public meeting and written comments were accepted through the close of the public review period on July 24. No further response is required.

Letter
17

From: Huff <huffmtry@aol.com>
Date: June 12, 2020 at 4:02:18 PM PDT
To: Terri Viehmann <tviehmann@tcpud.org>
Subject: Re: Notice of Meeting - TCPUD Board of Directors Meeting 6/19 8AM

Thanks, Terri!
Did my email urgently requesting postponement of the DEIR Public Meeting and written Comment Deadline get into the Board's reading file for next Friday's meeting? Do you need me to resend it? I don't know how they could get all the parties into the TCPUD space anyway because of the social distancing requirements.
Have a great weekend,
Roger

I7-1

In a message dated 6/12/2020 2:25:07 PM Pacific Standard Time, tviehmann@tcpud.org writes:

The screenshot shows an email header for Tahoe City Public Utility District. The main content is a "Notice of Meeting: TCPUD Board of Directors" scheduled for Friday, June 19, 2020, at 8:00am. It states that due to Executive Order N-29-20, the meeting room will not be accessible to the public. Public comment will be accepted via email and text message. Direct comments should be sent to Terri Viehmann, District Clerk, at tviehmann@tcpud.org or (530) 414-9734. Two links are provided for the agenda: one for the website and one for DropBox.

Letter I7 Roger Huff

June 12, 2020

Response I7-1

The comment asks if their request to postpone the Draft EIR public meeting on July 17 and deadline for public comments was accepted. The comment notes the TCPUD space might not provide sufficient space for social distancing. See response to comment I4-1 that addresses concerns related to postponing the July 17 public meeting. See response to comment I6-1 that discusses the meeting was held as a virtual meeting, which addresses concerns related to social distancing.

Letter I8

From: [Bonnie Dodge](#)
To: [Huff](#)
Cc: [Judy Friedman](#); [Dan Wilkins](#); [John Pang](#); [Scott Zumwalt](#); [Gail Scoville](#); [Sean Barclay](#); [Kim Boyd](#); [Terri Viehmann](#); [normski@pacbell.net](#); [rayqarland2@gmail.com](#)
Subject: Re: URGENT REQUEST TO RELAX THE DEIR PUBLIC REVIEW SCHEDULE
Date: Saturday, June 13, 2020 7:59:00 AM

Thank you Roger. Extra time is definitely needed and appreciated.
 Board members,
 Please extend the deadline,
 Bonnie M Dodge

Sent from my iPhone

On Jun 10, 2020, at 10:29, Huff <huffmtry@aol.com> wrote:

Dear Board Members,

The consolidated version of this Draft Environmental Impact Report (DEIR): contains 831 pages of narrative, graphics, and data tables, lacks a readily apparent access link on the District’s Web site, and public access to a paper copy is apparently limited to one outside your Administrative office during weekday work hours.

The current 17 July public meeting and 24 July written comment submission deadline do not provide sufficient time for members of our community to: access, review, compile, and submit comments on this large and complex document; and the State Web site (see <http://opr.ca.gov>) clearly states that, “CEQA establishes a floor and not a ceiling for public review and comment periods. Lead and responsible agencies may use their discretion to extend such time periods to allow for additional public review and comment.”

You are therefore urgently requested to relax the schedules for both the Public Meeting and written comment submission deadline by at least thirty (30) more days to prevent any further damage to the credibility of this already controversial and divisive project.

Very sincerely,

Roger Huff

I8-1

Letter I8 Bonnie Dodge
 June 13, 2020

Response I8-1

The comment includes a request to extend the public review and comment deadline. The comment also includes a copy of comment letter I5, which is responded to in response to comment I5-1. See response to comment I4-1, which addresses the comment’s request to extend the public review period.

From: Huff <huffmtry@aol.com>
Date: June 15, 2020 at 4:47:41 PM PDT
To: Terri Viehmann <tviehmann@tcpud.org>
Subject: Re: Notice of Special Meeting - TCPUD Board of Directors 6/16 1PM
Reply-To: Huff <huffmtry@aol.com>

**Letter
I9**

Thank you, Terri!
 Would you please confirm if my emails:(1) Urgently requesting the Board to postpone both the 17 July Meeting and 24 July DEIR comment deadline, and (2) Concerns about being able to accommodate the former Public Meeting in TCPUD spaces due to current social distancing rules got into the Board's Reading file?
 Safe well,
 Roger

I9-1

In a message dated 6/15/2020 12:14:28 PM Pacific Standard Time, tviehmann@tcpud.org writes:

Tahoe City
Public Utility District

?

Notice of Special Meeting: TCPUD Board of Directors

This meeting will be held on Tuesday, June 16, 2020, 1PM

As permitted by Executive Order N-29-20, proclaiming a State of Emergency in the State of California, this meeting room will not be accessible to the public.

The meeting is accessible to the public via live streaming. Public comment will be accepted via email and text message on any item on the agenda at any time beginning at 1:00 p.m. and ending at the close of public comment on the item. Comments pertinent to TCPUD and items on this agenda will be read aloud during the meeting when public comment is called for on that item.

Direct comments to Terri Viehmann, District Clerk, tviehmann@tcpud.org or via text message to (530) 414-9734

- [Click here for agenda \(website\)](#)
- [Click here for agenda \(DropBox\)](#)

Letter I9 Roger Huff
 June 15, 2020

Response I9-1

The comment asks if their request to postpone the Draft EIR public meeting on July 17 was accepted. The comment notes the TCPUD space might not provide sufficient space for social distancing. This comment is nearly identical to an earlier comment submitted by the author of this letter. See response to comment I7-1.

Letter
I10

From: [Alex Lesser](#)
To: [Kim Boyd](#)
Subject: Questions and Comments Regarding Draft EIR
Date: Tuesday, June 23, 2020 6:14:32 AM

Hi Kim

I would like to present my questions and concerns after reviewing the draft EIR. There are many concerns that I am hopeful can be addressed appropriately.

1. I am concerned about the possibility described in the paragraph following Table 2-5 that the proposed facility could end up being owned by TCCSEA, but on publicly owned land?

I10-1

2. I am concerned about the implication in the subsequent paragraph that TCCSEA would have primary control over event bookings for both the new facility and the Highlands Community Center?

I10-2

3. *The repeated use of vague terms like “repurposed” or “adaptive reuse” throughout the Draft EIR seems to ma an attempt to hide the actual scope of the proposed massive internal changes and additions to the historic structure?*

I10-3

4. *The repeated usage of terms like “community uses” and “community needs” are misleading, because these modifications and additions are specifically designed around the TCCSEA’S membership and commercial activities?*

I10-4

5. *I personally disagree with the statement made in Section 3.2.1 that the proposed facility’s 10,000+ sq. ft. structure, very large parking area, and operations would have “less than significant impact” on aesthetics in The Highlands*

I10-5

6. *It seems disingenuous that the statement made in Section 3.2.3 that administrative procedures could mitigate all the impacts of locating hundreds of gallons of flammable fuel and other hazardous materials beside two schools with one emergency response and evacuation route to a “less than significant level”*

I10-6

7. *It also seems disingenuous the claim in Section 3.2.7 that allowing up to a hundred more vehicles a day onto the only response and evacuation route for those schools would have a “less than significant” impact upon emergency response times*

I10-7

8. *Do you believe the assumptions made in Section 3.2.9 that: (a) the proposed facility would not attract more visitors, (b) most would be from the local area, and (c) the increase number of activities and large event would not increase wildfire risks in a “Very High Fire Severity Zone”?*

I10-8

9. *I personally disagree with the statement made in Impact 3.3-4 that, “the proposed project is not expected to substantially affect” important wildlife movement corridors; or have you seen bear, coyote, and other animals use the area. Do you?*

I10-9

10. *Do you concur with Section 3.4.1 that the proposed project would qualify as a “Rehabilitation” under the Secretary of the Interior’s Standards, even though the massive interior modifications and 6,000 sq. ft. of additions including a basement obviously do not “retain the historic structure’s character”?*

I10-10

11. *I am specifically concerned with Sections 3.5.2 and 3.3.5 which don't reflect requests by multiple residents that the EIR specifically address the safety risks that the increased car and bus traffic would have upon pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris Road between the schools and Heather Lane. How can my concerns be addressed?*

I10-11

12. *Do you believe the: lane/street closures, redirection of traffic, staging of heavy (idling) vehicles during construction of the proposed project mentioned under Impact 3.5-5 is acceptable for a residential neighborhood with two schools?*

I10-12

13. *I am especially disappointed with the suggestions made in Section 3.6.1 and elsewhere that the proposed project might be able to circumvent certain (Air Quality and other) concerns by paying administrative "Mitigation Fees." Paying money to pollute seems completely antithetical to every other made by the TCPUD to maintain the Tahoe atmosphere of the project.*

I10-13

14. *Do you agree with the final sentences in Section 3.6.2 that with regard to Air Quality, except for North Middle and High School students, "there are no other sensitive receptors within the vicinity of the proposed project?"*

I10-14

15. *Do you support basing the Air Quality impact assessments upon the same questionable assumptions as project traffic as described in Impact 3.6-3?*

I10-15

16. *In late June, residents had to use rakes and shovels to prevent a brushfire on the Conservancy property immediately behind homes on Polaris from spreading into nearby trees after discovering their hoses had no water pressure due to activities at the school(s). Since both TRPA Policy PS-2.3 and NTFPD Code do not allow "any development requiring water in any area unless adequate storage and distribution systems to deliver an adequate quantity for domestic consumption and fire protection"; do you agree with the assertion in (Section 3.11.1) that "no mitigation measures are required" for development at Site D?*

I10-16

17. *In view of the above, do you support estimating the water needs of a facility that would be over twice as large and on the same supply line as several schools based upon usage of the current Highlands Community Center?*

I10-17

18. *Will you join other residents to formally request the TCPUD to include the following as another Alternative in the next Environment Impact Report:*

- *Replace the 2,465 sq. ft. Highlands Community Center with the original 4,607 sq. ft., two story, historic Schilling Lodge; as favored by residents and as consistent with both the Donor's and the Schilling Family's wishes.*
- *Only allow minimal internal modifications required not just to meet needs of the Applicant; but also for larger Community enjoyment as the Donor and Family also intended.*
- *Limit the parking area size to that required to minimize on-street parking on an average versus a peak day, and*
- *Transfer final ownership to the TCPUD to avoid problems associated with putting a privately-owned facility on publicly-owned land, and allowing it to be shared by "the larger Tahoe Community" as the Donor has specified."*

I10-18

19. *Although Item 11 in Appendix D currently says, "The Café will not sell alcohol," do you want it to clarify whether alcohol will be permitted on the premises?*

I10-19

20. *In view of: it allowing up to 100 more cars and buses, current speeding, history of crashes on steep icy sections, pedestrians upon a street without sidewalks, restricted corner sight distance, and congesting the only emergency response and evacuation route for two schools; do you agree with Appendix D that, "the proposed project of site D wouldn't result in a significant traffic safety impact"?*

I10-20

Letter I10 Alex Lesser

June 23, 2020

Response I10-1

The comment refers to the text following Table 2-5 on page 2-24 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," and expresses concern that the proposed lodge would be owned by TCCSEA but located on publicly owned land. TCPUD and TCCSEA have not finalized ownership details for the Schilling Lodge. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-2

The comment refers to the text following Table 2-5 on page 2-24 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," of the Draft EIR and expresses concern about TCCSEA having primary control over event bookings for both the new facility and the Highlands Community Center. It was not TCPUD's intention to relinquish control for booking events at the Highlands Community Center to TCCSEA. Thus, the "Highlands Community Center" section on page 2-24 is revised in this Final EIR to clarify that TCPUD would be in control of booking community use of or events at the Highlands Community Center. This change is presented below and in Chapter 2, "Revisions to the Draft EIR," in this Final EIR. This clarification does not alter the conclusions with respect to the significance of any environmental impact.

The last paragraph on page 2-24 of the Draft EIR is revised to read as follows:

Where feasible and possible, requests for use of the Existing Lodge community space would be directed to TCCSEA for primary consideration to access and use the Schilling Lodge. In instances where the Schilling Lodge is not available, the Highlands Community Center could be made available to the community, but only under the number and type of requests as described in Table 2-5. TCPUD would be in control of any community use of or events at the Highlands Community Center. These uses could include community meetings, recreation classes, special events, multi-purpose room, fundraisers, and would comply with the current patron capacity of the building and parking lot. While community use of the Highlands Community Center would be considered secondary to the Schilling Lodge, other specific future TCPUD uses that would be a change from proposed and existing uses are unknown at this time and are therefore not considered part of this Project. Over time, TCPUD would assess improvement needs, such as rehabilitation or upgrades, but would continue to use the Highlands Community Center in a manner consistent with TCPUD public facilities. Cross-country skiers, hikers, trail runners, and mountain bikers could continue to park at the Highlands Community Center and access nearby trails from that location. TCPUD would staff the Highlands Community Center only as needed.

Response I10-3

The comment takes issue with the use of the term "repurposed" or "adaptive reuse" in the Draft EIR with respect to the Schilling Lodge. The Draft EIR clearly states that repurposing the historic structure from a former residence to a new lodge is one of the objectives of the Project (see eighth bullet on page 2-6 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," of the Draft EIR). Section 2.5.1, "Project Characteristics," in Chapter 2 of the Draft EIR describes the adaptive reuse of the Schilling residence, explains in detail the proposed changes (including renovation and additions to the original building), and quantifies the sizes of various areas inside the proposed Schilling Lodge in Table 2-2 on page 2-12 of the Draft EIR. Figure 2-3 provides a site plan that shows the various new spaces and uses in the Schilling Lodge and delineates the component of the building that would comprise the expansion (see page 2-8 of the Draft EIR). Figure 2-4 provides a visual representation of the Schilling Lodge in its repurposed state (see page 2-9). These details are necessarily disclosed at this stage of the Project (as they have been in Chapter 2 of the Draft EIR) to allow for adequate environmental analysis of the proposed Project throughout the Draft EIR.

Response I10-4

The comment asserts that the use of the terms “community uses” and “community needs” are misleading since the Project is designed around TCCSEA’s membership and commercial activities.

As described throughout Chapter 2, “Project Description of the Proposed Project and Alternative Evaluated in Detail,” of the Draft EIR, the proposed Project would provide a number of opportunities for community use of the Schilling Lodge consistent with current public use at the Existing Lodge. The following is a list of community uses that are described in more detail under Section 2.5.1, “Project Characteristics,” in Chapter 2 of the Draft EIR and could be supported by the year-round facility:

- ▶ professionally operated access to public outdoor recreation spaces;
- ▶ community ski programs for skiers of all ages;
- ▶ volunteer opportunities for trail maintenance;
- ▶ existing uses that would continue with no fees include school district sporting events, Boy Scout meetings, and fundraising events for other non-profits;
- ▶ continuation of existing large special events (e.g., Great Ski Race); and
- ▶ members of the community, small local community and non-profit organizations, and larger organizations may also book the Schilling Lodge for small meetings, private gatherings, or other private events (e.g., running, skiing, and biking day camps).

Additionally, Tahoe XC is a community amenity, providing opportunities for cross-country skiing and snowshoeing for the general public. The Schilling Lodge would enhance the experience for skiers by providing expanded space for public use lockers, restrooms, first aid, wax rooms, a team room, meeting space, and staff space.

As described on page 2-5 of Chapter 2 in the Draft EIR, the Existing Lodge does not provide adequate space for existing wintertime use and future winter and summer use (e.g., insufficient space for staff, storage, equipment repair, etc.).

Response I10-5

The comment expresses disagreement with the statement made in Section 3.2.1 of the Draft EIR that the proposed Project would have a less-than-significant impact on aesthetics in the Highlands neighborhood. The analysis of the potential for the proposed Project to have an adverse effect on aesthetics is provided on page 3-7 of the Draft EIR. The analysis notes that the proposed Project site was preferred over other locations because it minimized visibility to neighbors while also providing beneficial views of the surrounding forested area from the facility. Views from private property are not specifically protected, beyond those protections that might be secondary benefits of implementing the Area Plan and TRPA design standards, guidelines, and height restrictions in new developments. The analysis is revised below and in Chapter 2, “Revisions to the Draft EIR,” in this Final EIR to address editorial issues but the impact conclusion is not changed.

The fourth paragraph on page 3-7 of the Draft EIR is revised as follows:

Because the proposed Project and Alternative A would be designed to blend with the natural setting and be compatible within the context of ~~the~~ both sites and the surroundings in compliance with applicable regulations, neither would degrade the existing visual character or quality of ~~the~~ either site nor their surroundings.

Additionally, the proposed Project and Alternative A would be consistent with the height and design standards required by the Area Plan or the TRPA Scenic Quality Improvement Program or Design Review Guidelines.

This comment does not provide any specific evidence to support their claim that the Project’s impact on aesthetics in the Highlands neighborhood would not be less than significant. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-6

The comment disagrees that administrative procedures could reduce the potential impacts of locating hundreds of gallons of flammable fuel and other hazardous materials beside two schools with one emergency response and evacuation route to a less-than-significant level.

The Draft EIR acknowledges the existing use of hazardous materials at the Existing Lodge and continuing use of hazardous materials at the Schilling Lodge on page 3-9 of the Draft EIR:

During operation of the Schilling Lodge, future use and storage of hazardous materials would include fertilizers and pesticides typically used for landscaping and household cleaners that would be used for routine maintenance and would be similar to those used under existing conditions. Hazardous materials similar to those used during construction could also be used periodically as part of operation, maintenance, and repair of infrastructure, equipment, and facilities. Winter operations would also continue to conduct limited refueling for onsite equipment at the proposed Project site or Alternative A site consistent with existing conditions.

The hazards and hazardous materials regulations and standards summarized under Section 3.2.3, "Hazards and Hazardous Materials," on pages 3-9 through 3-10 of the Draft EIR are set by regulatory agencies to protect the health and safety of a community. Thus it can be reasonably assumed that compliance with these regulations would be sufficient to minimize impacts from hazardous materials stored and used for the Project. As discussed on page 3-11 of the Draft EIR, any potential hazards associated with the use, storage, transport, or disposal of hazardous materials over the course of constructing the Project or during operation of the Project would be avoided or minimized through compliance with these regulations.

The Project site is designated "Recreation" and per the Area Plan (Section 1.06.B in the Implementing Regulations) and TRPA Code Section 21.3.1.E, accessory uses for lands under the Recreation designation includes maintenance facilities. Thus, maintenance facilities such as those associated with the Project that would include storage of fuel (see response to comment A3-2 that addresses storage of fuel at Tahoe XC) are an allowed use at the proposed Project site and Alternative A site.

See response to comment I10-7, which addresses concerns related to emergency response and evacuation.

The comment does not provide any specific evidence that compliance with existing regulations applicable to the use, storage, and disposal of hazardous materials and emergency planning would not reduce or avoid potentially significant impacts. See response to comment A3-2, which identifies revisions to Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," and Section 3.2.3, "Hazards and Hazardous Materials," in the Draft EIR that clarify the present and future use of the fuel tank to support Tahoe XC operations. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-7

The comment disagrees that allowing up to 100 more vehicles per day onto the only emergency response and evacuation route for the schools would be a less-than-significant impact.

The comment is inaccurate in its characterization of the number of new Project-generated trips. Please see pages 3.5-13 through 3.5-17 of the Draft EIR for a detailed description of trip generation. As stated on page 3-12 under the discussion of potential impacts to an emergency response plan or emergency evacuation plan under Section 3.2.3, "Hazards and Hazardous Materials," in the Draft EIR, "the Project-generated traffic, including for special events, would be appropriate to the capacity of the facility and therefore would not generate traffic volumes that would physically interfere with implementation of an adopted emergency response plan or emergency evacuation plan." Also stated on page 3-12, the Project would be required to develop and implement an Emergency Preparedness and Evacuation Plan consistent with Government Code Section 65302(g) and Placer County Tahoe Basin Area Plan Policy NH-P-6.

This comment does not provide any specific evidence to support their claim that the Project's impact on emergency response and evacuation would not be less than significant. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-8

The comment questions whether TCPUD agrees with the assumptions made in Section 3.2.9, "Wildfire," in the Draft EIR related to visitor use, activities, and events as they relate to wildfire risk. The comment inaccurately states that Section 3.2.9 states that the Project would not attract more visitors. See the seventh full paragraph on page 3-15 of the Draft EIR, which begins, "Implementation of the Project would result in an increase in the number of visitors to the Schilling Lodge relative to existing conditions."

Pages 3-15 through 3-16 of the Draft EIR, explains components of the Project that would reduce or avoid the potential for increasing wildfire risks as follows:

Operations at the Schilling Lodge would include defensible space of at least 100 feet and would implement other applicable requirements of the Uniform Fire Code, Uniform Building Code, and NTFPD Fire Code requirements, including ignition-resistant construction, automatic interior fire sprinklers, onsite fire hydrant minimum flows, and adequate emergency and fire apparatus access. Additionally, both the proposed Project and Alternative A would not include any outdoor Project components, such as fire rings, that would pose a wildfire ignition threat. The Schilling Lodge would include one indoor gas fireplace.

This comment does not provide any specific evidence to support the comment's claim that the Project's impact on wildfire risk would not be less than significant. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-9

The comment expresses disagreement with the conclusion in Impact 3.3-4 of the Draft EIR that the proposed Project is not expected to substantially affect important wildlife movement corridors, and references common species such as black bear and coyote. As discussed in Impact 3.3-4 under Section 3.3, "Biological Resources," disruption of potential wildlife movements could result from vegetation removal and facility construction but the impact would be less than significant. While the presence of wildlife exists in the area, the proposed Project site and Alternative A site are not likely to function as an important corridor due to existing human disturbance levels; lack of high-quality forage and cover; and habitat fragmentation and degradation from residential, recreation, commercial, and other uses on and near the site, and adjacent roads and associated edge effects. The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I10-10

The comment is related to the potential for the proposed Project to qualify as "Rehabilitation" under the Secretary of the Interior's Standards.

The definition of "Rehabilitation" is not dependent on the outcome of the work done on a historic structure; it is a term meant to provide guidance on the appropriate type of treatment. The U.S. National Park Service (NPS) has developed definitions for the four major treatments that may be applied to historic structures: preservation, rehabilitation, restoration, and reconstruction, as described on page 3.4-2 of Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," in the Draft EIR. The appropriate treatment, whether preservation, rehabilitation, restoration, and reconstruction, is dependent on the historical significance, physical condition, proposed use, and intended interpretation of the structure.

Rehabilitation is defined as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values" (NPS 2020a). Because the building is already dismantled and in storage, and proposed to be reconstructed with alterations and additions in conversion to a public use once relocated to the site, the treatment "Rehabilitation" is appropriate. This means that the "Rehabilitation" section of the Secretary of the Interior's Guidelines should be the guiding source for work done on the building, which includes preserving historical features.

Response I10-11

The comment expresses concern that the Draft EIR does not address requests by multiple residents that the Project be analyzed for the increased car and bus traffic safety risks to pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris Road between the schools and Heather Lane.

Please see Master Response 1: Transportation Safety. The comment does not provide any data or evidence to contradict the conclusions of the transportation analysis related to roadway safety in the Draft EIR. Therefore, no further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-12

The comment poses the question as to whether it is acceptable to allow construction that could potentially result in lane/street closures, redirection of traffic, staging of heavy (idling) vehicles in a residential neighborhood with two schools.

Impact 3.5-5 starting on page 3.5-28 of the Draft EIR addresses potential construction-related traffic impacts resulting from implementation of the Project and includes Mitigation Measure 3.5-5, which requires the applicant to prepare and implement a temporary traffic control plan during construction activities. Additionally, as noted on page 2-22 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR, "Construction staging would be accomplished on the Project site or with approval from Tahoe Truckee School District, on the adjacent parking lot for North Tahoe High School and North Tahoe School when school is not in session." Thus, the comment's assumption that heavy vehicles would be staged on residential streets is inaccurate. The question posed in the comment does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-13

The comment takes issues with the concept of carbon credits that are referenced in Section 3.6.1 of the Draft EIR. Section 3.6, "Air Quality," makes mention of mitigation fees on page 3.6-6 under the summary of Mitigation Measure 11-2a from the Area Plan EIR/EIS. Mitigation Measure 11-2a lists participation in PCAPCD's offsite mitigation program (i.e., Land Use Air Quality Mitigation Fund) as a mechanism to reduce construction emissions to less-than-significant levels. The Land Use Air Quality Mitigation Fund, overseen by PCAPCD, is intended to be used to reduce Project-related emissions of criteria air pollutants and ozone precursors when onsite mitigation is insufficient to offset significant emissions. Mitigation fees may be utilized once all feasible onsite mitigation has been exhausted and is not a mitigation pathway to excuse Project-generated emissions. Rather, the Land Use Air Quality Mitigation Fund uses mitigation fees to fund other air pollution-reducing projects within PCAPCD's jurisdiction when onsite mitigation has already been implemented. Moreover, the Project and Alternative A would not generate construction emissions in exceedance of PCAPCD's recommended mass daily thresholds of significance for criteria air pollutants and ozone precursors (see Tables 3.6-4 and 3.6-5 in the Draft EIR).

Page 3.6-4 of the Draft EIR summarizes TRPA's Traffic and Air Quality Mitigation Program (Section 65.2 of the TRPA Code of Ordinances [TRPA Code]), which requires that a project that would result in additional trip generation pay a mitigation fee based on TRPA assessment. This is a regulatory requirement of TRPA and is not intended to be used as a significance determination during CEQA review. The Project would be beholden to this TRPA requirement regardless of the CEQA significance determination.

The comment is opinion based and does not address the adequacy of the Draft EIR. No edits to Draft EIR are needed. The comment is noted and no further response is required.

Response I10-14

The commenter questions whether there are no other sensitive receptors in addition to those referenced on page 3.6-12 of the Draft EIR. Paragraph 2 on page 3.6-12 summarizes the existing sensitive receptors near the Project site by stating:

[s]ensitive receptors near the proposed Project and Alternative A sites include students at the North Tahoe High School and North Tahoe Middle School and residences along project roadways (such as Polaris Road and Country Club Drive). Based on data from the 2019/2020 school year, 398 and 446 students were enrolled in North Tahoe High School and North Tahoe Middle School, respectively (Public School Review 2019a and 2019b). There are no other sensitive receptors within the vicinity of the proposed Project and Alternative A.

As discussed in the Draft EIR, sensitive receptors, defined as residential dwellings, schools, hospitals, playgrounds, and similar facilities that support populations more sensitive to exposure to air pollution, the Project site is within the vicinity of residents along Polaris Road and Country Club Drive, and students at North Tahoe High School and North Tahoe Middle School. These receptors were identified to evaluate localized air pollution impacts (TACs, particularly diesel PM). Diesel PM is shown to disperse up to 80 percent at approximately 1,000 feet from the source (CARB 2005). Using 1,000 feet as a standard to evaluate diesel PM, the aforementioned sensitive receptors are the only receptors within the vicinity of the Project site. The comment is noted and no further response is required.

Response I10-15

The comment disagrees with the use of the Project traffic data in the air quality analysis. The Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR was developed using existing vehicle trip generation rates because the ITE Trip Generation Manual does not have a standard land use for a cross-country ski lodge. The findings of the report are considered substantial evidence pursuant to State CEQA Guidelines Section 15384(b) as evidence supported by "facts, reasonably assumption predicated upon facts, and expert opinion supported by facts." As the lead agency, TCPUD is provided the discretion to select the model or methodology most appropriate to enable decision makers to intelligently take into account a project's contribution to a significant environmental impact. The conclusion of the Transportation Analysis (Appendix D of the Draft EIR) informed the estimation of air pollution from new vehicle movements associated with implementation of the Project. As summarized in Tables 3.6-6 and 3.6-7 in the Draft EIR, implementation of the proposed Project and Alternative A would not introduce mobile-source emissions in exceedance of PCAPCD's significance criteria. No edits to the Draft EIR are needed. The comment is noted and no further response is required.

Response I10-16

The comment describes a scenario in June where residents used rakes and shovels to prevent a brush fire from spreading on land near residences in the Highlands neighborhood. The comment asserts there was no water pressure due to activities at the school. The comment asks if TCPUD agrees with the assertion that no mitigation measures would be required at Site D in light of TRPA Policy PS-2.3 and North Tahoe Fire Protection District (NTFPD) Code that place limitations on development if there is not adequate water for domestic use and fire protection.

Under Impact 3.11-1 in Section 3.11, "Utilities," in the Draft EIR explains in the first paragraph on page 3.11-11, that TCPUD has sufficient water supplies available to meet current and projected water demands in their service area during normal, single dry, and multiple dry water years. Additionally, on page 3.11-11 the analysis states, "Additionally, TCPUD has indicated that the water supply infrastructure that the proposed Project would connect to would be sufficient to serve the proposed Project, including meeting fire flow requirements (Homolka, pers. comm., 2017)." Thus, the Draft EIR has analyzed the ability of TCPUD's water supply and infrastructure to meet the water demand of the proposed Project and ability to meet minimum fire flow standards at the proposed Project site. For the reasons described herein, the comment's claims that no mitigation measures would be required to ensure the proposed Project is served by adequate water for domestic use and fire protection are inaccurate.

In an email from Matt Homolka, Assistant General Manager and District Engineer of TCPUD, to Roger Huff, resident or property owner in the Highlands neighborhood, Mr. Homolka provided the following information related to the fire in June and availability of water supply to the proposed Project site (Homolka, pers. comm., 2020):

Your assertion that "The current water supply to that area of the Highlands has very serious real world limitations when it comes to major firefighting requirements" is incorrect and without basis. In fact, the water supply in that area of Polaris Road is one of the most robust water supply areas within the District, specifically as a result of the North Tahoe High/Middle School (NTHMS) located at the end of the road. That area is located in what is called the "Upper Highlands Pressure Zone" of the Tahoe City Sub-Regional Water System.

This pressure zone was created during the reconstruction of the NTHMS in 2006. This pressure zone is served by a 1.1 million gallon water storage tank with the ability to add up to 750 gallons per minute (gpm) by pumping. Further, this system was designed to supply fire hydrants with at least 2,000 gpm of fire-fighting flow for 4 hours and in many cases well exceeds that design standard. This is far in excess of typical residential neighborhoods and was done to meet the fire flow requirements of the NTHMS. The system pressure in the area of this incident is 68 pounds per square inch (psi) and the water service pressure at your house is 54 psi.

Your anecdotal statement that there was no water pressure from a garden hose is confusing, but certainly not evidence of any issue with the water supply system. We are unaware of the condition or configuration of the private water service or house plumbing nor the length, size, or condition of the garden hose or whether it was kinked in the panic to put out a fire. We are confused by your claim that this lack of pressure was caused by activities at the school. As you know, the school was not occupied during that time and, regardless, the school's normal water demands would have no impact on water service flow to your property. During that week, we know that NTFPD was training in the area. However, their reported water usage on May 28th would not explain a loss of pressure to the house service.

Response I10-17

The comment disagrees with the approach in the Draft EIR used to estimate the water needs of the proposed Project that would be greater than and on the same water supply line as several schools based on the current Highlands Community Center. The water demand estimate represents a proportional increase based on a water demand factor developed from past water use data from 2014-2017 that was provided by TCPUD, the water supplier to the Highlands neighborhood, and multiplied by the total square footage of the proposed Schilling Lodge (see the "Methods and Assumptions" section on pages 3.11-7 through 3.11-8 of Section 3.11, "Utilities," in the Draft EIR). This comment does not provide any specific evidence that the water demand analysis in the Draft EIR is inadequate, inaccurate, or incomplete. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-18

The comment suggests the Draft EIR analyze an alternative that considers no expansion to the original Schilling residence building, minimal internal modifications, limiting the parking onsite while also minimizing on-street parking, and transfer ownership to TCPUD. Three reduced size alternatives were analyzed in the Draft EIR (Site A – Reduced Project on page 4-3 in Chapter 4, "Alternatives," of the Draft EIR, Site A – Modified Project on page 4-10, and Site D – Reduced Project on page 4-15). The Site D – Reduced Project also included a reduced number of parking spaces.

Site A – Reduced Project would include a 6,229-square foot (sq. ft.) building. This alternative was dismissed because (see page 4-3):

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 Site A – Modified Project alternative would include a 6,229-square foot building and would retain the Existing Lodge. Due to the configuration of the buildings, this alternative would result in a greater footprint than the proposed Project or Alternative A (Site A – Full Project), but would result in less new coverage than for the proposed Project (see page 4-10).

The Site D – Reduced Project alternative would include a 6,229-sq. ft. building. Because of the reduced number of parking spaces (65 total parking spaces), this alternative was found to result in 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 (see page 4-17).

As further discussed on page 4-22:

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.

From a functional perspective, the reduced size Schilling Lodge alternatives would not meet some of the Project objectives (e.g., address operational deficiencies in the current facility and improve financial viability) as well as the proposed Project. These alternatives include a Schilling Lodge that would be smaller than that of the proposed Project or Alternative A and the analysis in Chapter 4, "Alternatives," but larger than that proposed in the comment. Thus, it can be assumed that the comment's proposed alternative with a smaller lodge would also not achieve Project objectives. Further, the analysis of Site D – Reduced Project alternative that proposed fewer parking spaces than the proposed Project and Alternative A also demonstrated that the comment's proposal for reduced parking was considered and determined to not achieve some of the Project objectives and would not remedy issues with getting visitors from parking on the neighborhood streets.

Ownership of the Schilling Lodge by TCCSEA or TCPUD has yet to be determined and is not an environmental issue under CEQA. Its consideration as part of an alternative is not necessary.

As noted on page 4-1 of Chapter 4, "Alternatives," in the Draft EIR:

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.

Although the comment's suggested alternative would propose a lodge with a smaller square footage and reduced parking lot, it would not avoid potentially significant impacts that are identified for the proposed Project. It should be noted that neither the proposed Project nor Alternative A would result in any significant and unavoidable impacts. Because this alternative would still involve construction activities, this alternative would still likely result in:

- ▶ Removal of some trees greater than 30 inches dbh;
- ▶ Construction and operation of new facilities in habitats that may provide suitable habitat for special-status plants;
- ▶ Ground disturbance that would potentially encounter previously unknown archaeological resources, tribal cultural resources, or human remains;
- ▶ Construction-related impacts on traffic;
- ▶ An increase in daily VMT;
- ▶ An increase in GHG emissions;
- ▶ Construction noise and vibration;
- ▶ Operational event noise; and
- ▶ The potential need to upgrade the 6-inch water line in Country Club Drive to meet fire flow requirements if this alternative would be located at Site A.

Thus, for the reasons described above, the comment's suggested alternative would not meet all of the Project objectives, is not substantially different than other alternatives analyzed in the Draft EIR, and would not avoid or substantially lessen any of the significant effects of the Project is not considered for further analysis or consideration in the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I10-19

The comment requests clarification if alcohol would be permitted on the premises of the Schilling Lodge. The comment is correct that the café would not sell alcohol. As stated under the "Special Events" section on page 2-14 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," all event applications would be reviewed by TCCSEA for the presence of alcohol among other components of the event to determine if the event complies with the policies of the Management Plan and consistency with the types of events that are allowed at the Schilling Lodge. Additionally, the Management Plan policy related to onsite alcohol for the Schilling Lodge is the same as is presently implemented for the Existing Lodge. The comment's concern about the presence of alcohol on the property does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. No further response is required.

Response I10-20

The comments asks if the Project-generated addition of up to 100 more cars and buses, current speeding, history of crashes on steep icy sections, pedestrians upon a street without sidewalks, restricted corner sight distance, and congesting the only emergency response and evacuation route for two schools would result in a significant traffic safety impact.

Please see Master Response 1: Transportation Safety. The comment does not provide any data or evidence to contradict the conclusions of the transportation analysis related to roadway safety in the Draft EIR. Therefore, no further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Letter
I11

From: Cheryl Stewart
To: Kim Boyd
Cc: Cheryl Stewart; Roland Stewart
Subject: Tahoe Cross Country Lodge Replacement Location!!!
Date: Tuesday, June 23, 2020 11:05:48 AM

TCPUD,

We are Homeowners on Polaris Road.

WE STRONGLY OPPOSE LOCATION D for numerous viable reasons!!!

We do not want increased traffic on Polaris Rd!
AS YOU MUST KNOW & WE CAN PERSONALLY ATTEST TO, TRAFFIC ON POLARIS ROAD IS ALREADY AT PEAK DANGEROUS LEVELS!
WE HAVE VEHICLE TRAFFIC DURING THE DAY & EVEN AT NIGHT DUE TO SCHOOL FUNCTIONS MANY CHILDREN & RESIDENTS OF ALL AGES WALK POLARIS RD, CARS DRIVE TOO FAST, THERE ARE HILLS & CURVES WHICH FREQUENTLY POSE SERIOUS DANGER TO PEDESTRIANS DAY & NIGHT!
WE ABSOLUTELY DO NOT NEED ANY MORE TRAFFIC ON POLARIS RD!

I11-1

Location A Will not create more hazardous traffic for residents in the Highlands area.
Location A will not create more traffic on Polaris Rd which is already maxed out with traffic!
Location A with out question keeps traffic as minimal as possible to the entire area
Location A has worked very well for many years
Location A only requires a Slight expansion
Location A does not require the construction & development of another UNNECESSARY Site & building!
Location A “Already offers existing cross country pathways immediately adjacent“ to it’s current location!
Location A will be far less expensive
Location A will create far less pollution & environmental damage!!!
Location A is hands down the most logical, common sense, best location for all residents In the Highlands area which absolutely must be the priority!!!!
Location A provides much easier access for all visitors to the Tahoe Cross Country Lodge!

I11-2

“If this project is truly about improving the Cross Country Lodge”, there is no practical, environmental, cost efficiency, equitable to the Highlands Neighborhood area, Beneficial to Cross Country, reasoning for any location other than Alternate location A!

Sincerely,
Roland & Cheryl Stewart
2900 Polaris Rd
Tahoe City,Ca

Sent from my iPad

Letter I11 Roland and Cheryl Stewart

June 23, 2020

Response I11-1

The comment notes they are homeowners on Polaris Road and expresses opposition to the proposed Project being located at Site D. The comment describes perceived traffic issues on Polaris Road.

See Master Response 1, "Traffic Safety," which addresses the concern related to additional traffic and associated safety risks from the proposed Project. This comment does not provide any specific evidence that the traffic safety analysis in the EIR is inadequate, inaccurate, or incomplete. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I11-2

The comment asserts that Alternative A would not result in a number of effects, including creating more hazardous traffic for residents, more traffic on Polaris, construction of another building, and more pollution and environmental damage among other conditions. The comment asserts that if the Project is intended to improve the cross-country lodge, there is not a reason for another location.

See Master Response 1: Transportation Safety, which addresses concerns related to hazardous traffic. The comment is correct that Alternative A would result in less traffic than the proposed Project, but as described herein the significance level of transportation-related impacts are the same for the proposed Project and Alternative A.

The potential transportation impacts of the proposed Project and Alternative A are analyzed under "Environmental Effects of the Project," beginning on page 3.5-19 in Section 3.5, "Transportation," in the Draft EIR. A comparison of the transportation impacts of the proposed Project and Alternative A is provided in Section 4.8.3, "Transportation Impacts," on page 4-21 of Chapter 4, "Alternatives," in the Draft EIR. Here the analysis acknowledges that the proposed Project would alter the pattern of vehicle traffic in the Highlands neighborhood and could add traffic on Polaris Road at times when vehicles are also 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 in Section 3.5, "Transportation," neither implementation of the proposed Project nor 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. Additionally, the analysis concludes that although 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, the proposed Project and all alternatives would be required to mitigate the net increase in VMT over the existing amount of VMT so that there are no unmitigated VMT. Thus, there is no difference in the level of significance in the impact between the proposed Project and Alternative A related to traffic.

With regard to the comment's assertion that the area is maxed out with traffic, Impact 3.5-1 beginning on page 3.5-19 of Section 3.5, "Transportation," in the Draft EIR concludes that the level of service (LOS) of intersections in the study area would continue to operate at an acceptable LOS and would not substantially worsen under either the proposed Project or Alternative A. The Draft EIR also analyzed the potential for the proposed Project and Alternative A to determine whether or not implementation would cause a residential roadway to exceed its design capacity and warrant implementation of traffic calming measures (see Impact 3.5-2 beginning on page 3.5-21 of the Draft EIR). The analysis concluded that although the proposed Project would generate greater average daily trips, both the proposed Project and Alternative A:

....would not alter travel patterns or increase traffic volumes to the extent that the capacity of a residential roadway would be exceeded. Because Project-related traffic would not cause traffic volumes on residential roadways to exceed Placer County's 2,500 vehicles per day standard for residential roadways, this impact would be **less than significant** for the proposed Project and Alternative A.

The comments related to Alternative A resulting in a slight expansion, will be less expensive, proximity to cross-country trails, does not require the construction and development of an unnecessary site and building, and is the logical solution for the residents in the Highlands neighborhood are noted for consideration by the TCPUD Board during the review of the merits of the Project.

With regard to the comment that Alternative A would require a slight expansion, both the proposed Project and Alternative A would result in the Schilling Lodge that would be the same size and layout, which is included in the footnote to Table 2-1 (see page 2-6 of the Draft EIR) and described under Section 2.6, "Unique Features of the Proposed Project and Alternative A," on page 2-23 of the Draft EIR:

The characteristics of the adaptive reuse of the Schilling residence and Schilling Lodge operations associated with the proposed Project and the Alternative A would be the same and are described above under Section 2.4, "Tahoe Cross-Country Lodge Replacement and Expansion Project."

With regard to the comment that the Existing Lodge location has worked well for years, the inadequacies of the current location and lodge for the purposes of Tahoe XC are listed on page 2-5 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail." Some of the existing inadequacies listed there include lack of space for a number of operational components for Tahoe XC, limited storage, connectivity between the Existing Lodge and beginner terrain, and inadequate parking. Thus, while it is true that the Existing Lodge has been in operation for many years, the location has not worked well operationally for Tahoe XC. Additionally, as stated, under Section 2.4, "Project Objectives," on pages 2-6 and 2-7 of the Draft EIR, TCPUD and the applicant (TCCSEA) are undertaking the Project for a variety of reasons that are identified as Project objectives.

The comment stating that Alternative A would create far less pollution and environmental damage is not supported by evidence in the comment. Section 4.8, "Environmentally Superior Alternative," beginning on page 4-20 of the Draft EIR compares the potential impacts of the proposed Project to Alternative A and other alternatives selected for further evaluation (see Sections 4.4 through 4.6 in Chapter 4, "Alternatives") to determine which alternative would result in the least impact on the environment. Section 4.8.5, "Conclusion," on page 4-22 of the Draft EIR states:

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.

Thus, the proposed Project was determined to be the environmentally superior alternative.

The comment does not provide evidence that the Draft EIR is inadequate, inaccurate, or incomplete. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Bill](#)
To: [Kim Boyd](#)
Subject: TahoeXC draft EIR
Date: Tuesday, June 23, 2020 2:50:25 PM

Letter I12

TCPUD Board Members,

As a member of the Tahoe City community for more than 40 years, a business owner in Tahoe City for 25 years and a concerned citizen, I have reviewed the EIR as submitted by TCCCSEF on the proposed lodge of the reconstructed Schilling estate and find that the benefits of this project far outweigh the minimal impacts the project may have. TCCCSEF has a proud record of adding value to our community. This project is in line with that record. The preservation of this historical building along with the enhancement of the ski community makes this decision easy. Please make the “easy decision” and move forward with this project.

Thank you,
 William Sharbrough
 Sent from my iPhone

I12-1

Letter I12 William Sharbrough

June 23, 2020

Response I12-1

The comment includes background information about the letter’s author, summarizes benefits of the proposed Project, and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

**Letter
I13**

From: [Sharon Buss](#)
To: [Kim Boyd](#)
Subject: Tahoe-xc/Shilling Project
Date: Friday, June 26, 2020 9:04:20 AM

I am a full time resident at Tahoe since 1973. My passion is cross country skiing and my local community. Tahoe xc is a place of community that is shared with our students, local athletes, and the public of all ages.

When I learned of the gracious gift of the Shilling Estate and the fact that a piece of Tahoe History could be rejuvenated I was thrilled. We now have a possibility to enhance the experience of Tahoe XC and the many educational programs they are involved in.

I strongly urge that this possibility be backed by the TCPUD. It's our responsibility to preserve this historical building and allow for our community to have a real building that adds to the already amazing non-profit that is in place now. Much of the local history has already been discarded at Tahoe. Let's invest in our community!

Thank you,
Sharon Buss

Sent from my iPhone

I13-1

Letter I13 Sharon Buss
June 26, 2020

Response I13-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Rick Ganong](#)
To: [Kim Boyd](#)
Subject: CEQA/dEIR Tahoe Cross-Country Lodge Replacement and ...
Date: Saturday, June 27, 2020 9:59:31 AM

**Letter
I14**

Dear Kim:

I have reviewed the dEIR and summary. I believe the study to be very thorough. The method and issues were all discussed nicely.

I agree with and support the conclusions.

Thanks Rick Ganong
June 27,2020

I14-1

Letter I14 Rick Ganong
June 27, 2020

Response I14-1

The comment expresses support for the analysis in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

**Letter
I15**

From: [Debbie Hogan](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Monday, June 29, 2020 2:35:23 PM

Hi Kim,

I am writing in support of the new Lodge Replacement and Expansion Project.

After reviewing the Draft EIR, I was impressed by the detail in the report and I believe it is complete and adequate for the project. I also believe this lodge will serve the public interest of the North Tahoe area very well. Conclusions in the EIR are well founded and any potentially significant impacts can be mitigated. I am 100% in support of this Lodge Replacement and Expansion Project being built in Site D, the proposed Project site for all the reasons explained in the EIR.

I15-1

Thank you, let me know if there is any more I can do to help with the project.

Debbie Kelly-Hogan
PO Box 580
Tahoma, CA 96142

Letter I15 Debbie Kelly-Hogan
June 29, 2020

Response I15-1

The comment notes that the Draft EIR was detailed, complete, and accurate and expresses support for the analysis of the EIR and for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [David Schwisow](#)
To: [Kim Boyd](#)
Subject: Tahoe city cross country
Date: Thursday, July 02, 2020 7:24:41 PM

Letter
I16

Hello, I live at 3015 Polaris road and will NOT be supporting the new idea of the cross country center behind my house. With the high school already in place you will be adding an unsafe amount of traffic already on Polaris road. Please, there is NO reason for the new center. If your worried about beginners not being able to get up a small hill at the center then I suggest you take a road construction grade machine and flatten the hill out instead of building a new center which honestly, only get 50 to a hundred people at the most, on the most busiest holiday cross country skiing. It is impossible to pull out onto Polaris road with school traffic as it is, now you want to add more car traffic because a beginner can't climb a hill at the sufficient cross country center. Seems ridiculous to a local who has lived in the region for 18 years and 4 years on Polaris. I will be voting NO on development and so will my neighbors.

I16-1

David Schwisow
 3015 Polaris Road

Letter I16 David Schwisow

July 2, 2020

Response I16-1

The comment notes they are a resident located two houses from the proposed Project site and opposes the Project at this location. The comment notes the belief that there is already an unsafe amount of traffic on Polaris Road. The comment also explains that it is difficult to pull onto Polaris Road with school traffic. The comment suggests that to meet the needs of beginner cross-country skiers, the Project should grade the hill to make it flatter instead of building a new lodge.

See Master Response 1: Transportation Safety, which addresses concerns related to unsafe traffic on Polaris Road as a result of the proposed Project. See response to comment I11-2, which summarizes the transportation analysis in the Draft EIR related to increased vehicle trips that would occur with implementation of the proposed Project.

See response to comment I11-2, which also discusses operational inadequacies associated with the Existing Lodge and Project objectives that extend beyond simply the desire to provide improved access for visitors to beginner terrain.

The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [HPW](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Friday, July 03, 2020 8:16:35 AM

**Letter
I17**

Dear Mr. Boyd.

Peter Werbel here, board member of Truckee Donner Recreation and Park District. Having been involved in several EIRs in our district, am somewhat familiar with such documents. It appears to me, in brief review, that this EIR is most thorough and authors including "Alternative A" are to be commended. All pertinent issues have been addressed, with great detail for both noise and traffic impacts, which I know is of utmost concern to local residents. It appears to me that there are no significant detrimental impacts to the surrounding community which would impeded this project from moving forward.

I17-1

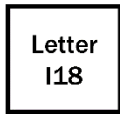
Regards,

Peter Werbel

Letter I17 Peter Werbel
 July 3, 2020

Response I17-1

The comment includes background information about the letter’s author and expresses support for the analysis in the Draft EIR. The comment expresses the belief that, per the Draft EIR, there would not be significant detrimental impacts to the surrounding community. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.



July 4th, 2020

Board of Directors

Tahoe City Public Utility District

Re: Tahoe Cross Country Lodge Replacement and Expansion Project

To Whom It May Concern:

From our viewpoint as very interested citizens of the nordic community, the Draft EIR prepared by Ascent Environmental, Inc. for the above project is very comprehensive and appears to address all of the important issues, questions and concerns that could arise. Honestly, we could not read every single word, but we are impressed with the detail available on site selections, the building project, parking, management, facility usage and its proposed limitations to suit the residential neighborhood location, as well as all the historical and environmental information in the report.

We have been skiing patrons of the cross country center on Country Club Drive for more than 40 years, beginning with Skip Reedy's operation out of the same building. The building in those early days was cozy and sufficient in size to handle the nordic community that used the trails in the winter. It is no secret that the popularity of the sport has grown exponentially in the past 40 years and the number of users of the same facility has increased right along with it. It's time for the center to grow in size and in functionality to better serve its patrons, youth winter sports programs and the community.

We support the repurposing of the historic Schilling Lodge and its expansion to become the new nordic and community center. The proposed Site D, near the high school/middle school, would be a better location than Site A as it would provide more parking, a level entry to the cross country trails, and more functional space on snow between the lodge and trails. The present location of the nordic center, near Site A, places skiers of beginner to advanced abilities on a tough hill immediately out of the center. This is very challenging for beginners. It's not that easy for the veteran skier either.

The idea of taking an historic building and making it "new" again while maintaining its Old Tahoe charm and ambiance is wonderful. What visitor wouldn't like to know more about the history of Tahoe and its earlier residents?! The current nordic (multi-use) building on Country Club is under-serving its recreational and visitor community. Here is an opportunity to provide an investment in both, as well as provide an additional facility for public meetings and other needs. We support the project and look forward to seeing progress in this direction.

Sincerely,

Patti and Michael Dowden

Verdi, NV (formerly Tahoe City 1973-2019)

I18-1

Letter I18 Patti and Michael Dowden
July 4, 2020

Response I18-1

The comment includes background information about the letter's authors, summarizes benefits of the proposed Project, expresses support for the proposed Project, and expresses support for the analysis in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

**Letter
I19**

July 5, 2020

Dear TCPUD Directors,

I am writing in regard to the CEQA findings for the Historic Schilling Lodge project. It appears that the study was diligent and complete. In reviewing those areas where it was found that there might be PS- Potentially Significant impacts, all areas were shown to be able to be mitigated to a satisfactory degree to make them LTS- less than significant.

This was also the case where two S-Significant impacts, Vehicle Miles Traveled and Operational Event Noise, were shown. I feel confident that the mitigation measures presented will be sufficient solutions.

I was pleased at the benefits shown in the study by having more parking spaces as well as proximity to the High School which provides better access for our students to utilize the enhanced facilities at the Lodge. I believe that this project should move forward at the Proposed Site and that it will create a tremendous asset for the community at large.

Sincerely,
Jan Ganong

I19-1

Letter I19 Jan Ganong
July 5, 2020

Response I19-1

The comment summarizes benefits of the proposed Project, and expresses support for the proposed Project and for the analysis in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

**VICKI & ROGER KAHN
POST OFFICE BOX 1305
TAHOE CITY, CA 96145**

**Letter
I20**

July 7, 2020

Ms. Kim Boyd
Tahoe City Public Utility District
P.O. Box 5249
Tahoe City, CA 96145

Dear Ms. Boyd;

RE: SCHILLING LODGE DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS

We agree with the premise that there is a need to replace the existing Tahoe Cross Country facility located at the Highlands Community Center. The draft EIR discussed why the existing facility has become inadequate over the years and how the opportunity came about for the relocation of the Schilling Lodge for its replacement. With that in mind, we see no reason to address the “no project” alternative that is a part of the EIR.

The Tahoe City PUD board of directors has directed the EIR to concentrate on the merits of the preferred alternative which would relocate the Schilling Lodge to a site adjacent to the existing North Tahoe High School/Middle School vs. alternative A which relocates the lodge to the current location at the existing site of the Highlands Community Center. We agree with the analysis that spells out the reasons why the preferred alternative is superior. They include higher elevation of the base facility which allows the cross country center to operate for longer periods during the winter season, a beginner area for cross country skiers adjacent to the new lodge, overflow parking on school parking lots during high utilization periods of the facility which do not conflict with the school as they likely occur on weekends and holiday periods when the schools are not in session (a reciprocal arrangement would allow the school to utilize the Schilling Lodge parking for their overflow needs as well), the likelihood of better utilization by the students and finally the retention of the existing building at the Highlands Community Center. The relocation of the Schilling Lodge at the site of the existing lodge is less desirable in each of the above reasons.

I20-1

The only possible drawbacks to relocation of the Schilling Lodge to the site adjacent to the schools are the potential environmental issues of additional plant and wildlife disturbance and tree removal which will likely occur in either scenario but may have more of an impact at the preferred location than at the existing Highlands Community Center location. We believe the developer, working with the permitting agencies, can and will minimize these impacts through site location and design.

I20-2

The issue of additional traffic has come up during this process however the EIR properly points out, while traffic utilization on the existing streets will be affected, the overall traffic impacts are not significantly different under either alternative.

The draft EIR discusses other environmental impacts and provides possible mitigation solutions to reduce their impacts. Knowing this is a project spearheaded by a large cross section of local residents, many of whom have lived in the North Tahoe community for many years, we are confident the project will be constructed with care to minimize environmental issues. The final product will be beneficial to the local community as well as visitors.


I20-2
cont.

We appreciate the opportunity to comment on the draft EIR. Thanking you, in advance, for your consideration of our thoughts, we are,

Very truly yours,



Vicki Kahn



Roger Kahn

Letter I20 Vicki and Roger Kahn
July 7, 2020

Response I20-1

The comment agrees that there is a need to replace the Existing Lodge, notes that the Draft EIR explains why it is inadequate, and notes that it seems unnecessary to address the No Project Alternative. The comment summarizes the benefits of locating the Schilling Lodge at the proposed Project site instead of at Site A. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I20-2

The comment notes describes some potential drawbacks of locating the Schilling Lodge at the proposed Project site; however, the comment expresses the belief that these impacts will be minimized through site location and design. The comment also summarizes the traffic impacts and notes they would not be substantively different under either the proposed Project or Alternative A. The comment also provides a brief summary of the involvement of local residents in the development of the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Huff](#)
To: schwartz@ntfire.net; [Sean Barclay](#)
Cc: patrick.wrgh@tahoe.ca.gov; dwalsh@placer.ca.gov; jmitchell@ttusd.org; dindeen@ttusd.org
Subject: RECENT WILDFIRE IN THE HIGHLANDS
Date: Wednesday, July 08, 2020 7:43:14 AM

Letter I21

Good Morning,

On the afternoon of May 28th, alert neighbors called 911 to report a brush fire on publicly-owned land directly behind homes along Polaris Road. Until NTFD units arrived, residents had to use rakes and shovels to keep it from spreading into nearby trees when they found their hoses had no water pressure because of activities at the school(s). What easily could have turned into a catastrophe, provides the following priceless lessons:

I21-1

1. On a “normal” school day, the only evacuation route would likely have soon become congested with firefighting equipment and other emergency vehicles,

I21-2

2. There is an urgent need to thin out the surface and ladders fuels on public lands,

I21-3

3. The current water supply to that area of the Highlands has very serious real-world limitations when it comes to major firefighting requirements, and

4. It would be totally irresponsible and in direct conflict with both NTFPD Code and TRPA Policy to permit development of the proposed project at Site D.

I21-4

The above deserves to be a serious wake up call for all the addressees on this email.

Please Help,

Roger

Letter I21 Roger Huff

July 8, 2020

Response I21-1

The comment describes a scenario in June where residents used rakes and shovels to prevent a brush fire from spreading on land near residences in the Highlands neighborhood. The comment asserts there was no water pressure due to activities at the school. See response to comment I10-16 that clarifies the events that occurred related to the brush fire mentioned in the comment.

Response I21-2

The comment asserts that on a normal school day, the only evacuation route would become congested with firefighting equipment and other emergency vehicles. Typically during an emergency situation requiring an area be evacuated, law enforcement and/or fire fighters facilitate the movement of evacuees from an area. Thus, the presence of firefighting equipment and other emergency vehicles would not interfere with the movement of evacuees out of an area.

Response I21-3

The comment states there is an urgent need to thin out the surface and ladder fuels on public lands. Operations at the Schilling Lodge would include defensible space area of at least 100 feet and would implement other applicable requirements of the Uniform Fire Code, Uniform Building Code, and NTFPD Fire Code requirements, including ignition-resistant construction, automatic interior fire sprinklers, onsite fire hydrant minimum flows, and adequate emergency and fire apparatus access (see Section 3.2.9, "Wildfire," on page 3-15 of the Draft EIR). TRPA also requires fire protection agency pre-approval, which includes approval of final plans, as part of its permitting processes. Additionally, the proposed Project site and Alternative A would require removal of some trees to construct the Project (see Table 2-2 on page 2-12 of the Draft EIR). This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Response I21-4

The comment expresses concern related to the water supply infrastructure in the Highlands neighborhood related to water supply needs for fire suppression purposes. See response to comment I10-16, which addresses the comment's concern related to water supply in the Highlands neighborhood, including water supply needed for fire suppression purposes.

From: [THOMAS O'NEILL](#)
To: [Kim Boyd](#)
Cc: rbganong@gmail.com
Subject: CEQA/dEIR for Schilling Lodge
Date: Thursday, July 09, 2020 10:39:33 AM

Letter I22

Dear Kim

I am writing regarding the Tahoe Cross Country draft EIR regarding the Schilling Lodge project. I have lived in Tahoe City for 50 years and raised my two sons here, I fully support this project it will not only benefit the community but also the many people who come to Tahoe to enjoy the scenery and recreational opportunities. The study was very thorough and I believe more than adequate in evaluating any environmental impacts. The evaluation was done by professionals in a discipline manner. Its conclusions are accurate. I do not see any negative Environmental impacts. As a long-term permanent resident of the Tahoe basin I pay close attention to new projects for both their benefit and impact, this project not only has great benefit, the impact is minimal. I urge you to continue the process and approve this worthwhile project Thank You

I22-1

Tom O'Neill

Contact:

E-Mail tfxon@sbcglobal.net

Tel (530) 583-2245

Letter I22 Tom O'Neill

July 9, 2020

Response I22-1

The comment includes background information about the letter's author and expresses support for the analysis in the Draft EIR and for the Project. The comment expresses the belief that there would be minimal or no negative impacts resulting from the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Travis Ganong](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Thursday, July 09, 2020 11:38:21 AM

**Letter
I23**

Hi,

My name is Travis Ganong and I was born and raised in North Lake Tahoe and grew up enjoying every outdoor activity our region has to offer. I currently live in Tahoe City, and enjoy skiing and biking in our beautiful backyard when not traveling and competing on there world stage as a member of the US Ski Team. I am very interested in the future of Tahoe which is why I am interested and invested in Tahoe XC’s proposed project.

After reading through the Drat EIR, I believe that this document is adequate in addressing the potential issues related to the project in a thorough and thoughtful manner. I do not see any significant environmental impacts in this EIR that can not be mitigated, and knowing the area and the practicality of proposed Site-D location first hand, I believe that the benefits of this project will positively transform the experience and recreation opportunities in our resort community. As a local, I have been interested in and aware of other projects that have been proposed over the years, and other EIR’s from developers normally throw up glaring red flags. The Tahoe XC EIR is different in that the project right off the bat does not create many substantial impacts to the environment in the first place, and that the few potential impacts that did come up are evaluated accurately and in a disciplined manner creating a plan for them to be mitigated to a less than significant level.

I23-1

Thanks for your time,

Travis Ganong
travis.g.skier@gmail.com
 530-559-5347

Letter I23 Travis Ganong
 July 9, 2020

Response I23-1

The comment includes background information about the letter’s author and expresses support for the analysis in the Draft EIR and for the proposed Project. The comment expresses the belief that there would be no negative impacts resulting from the proposed Project that could not be mitigated to less than significant. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: mboitano@sbcglobal.net
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Friday, July 10, 2020 10:50:17 AM

Letter I24

Tahoe City Public Utility District
 Kim Boyd, Senior Management Analyst
 PO Box 5249, Tahoe City, California 96145

Please consider this correspondence as “public comment” on the Draft EIR for the Tahoe Cross-Country Lodge Replacement and Expansion Project. I have read through the Draft EIR and consider it to be thorough, well presented and of realistic scope. I found it important that the items considered to be “potentially significant” were all found to be mitigatable.

The two items considered “significant”, noise and traffic, are certainly of concern to the neighborhood. I believe, as stated in the Draft, that there are design considerations that will moderate noise. Traffic is always a worry and it was considered at length in the Draft, along with the greenhouse gases that inevitably are part of that equation. I was satisfied that there are measures available to help mitigate the traffic fears and that the overall proposed impacts were found not to be material when compared with the existing location.

The preferred location, Site D, makes tremendous sense for all the reasons stated. The Draft EIR confirms that Site D should be considered the location of choice and is superior to the existing location, the alternative, Site A. The ability to reconstruct the historic Schilling Lodge, provide the local community with a valued facility in a superior location while providing a facility to serve as the hub for Tahoe Cross Country, is an enormous plus for all parties involved.

As a long term resident and property owner in the Rubicon area of Lake Tahoe, I am in favor of the proposed location. I should add, that as a season pass holder, I appreciate the recreational venue and the non-profit programs that TCCSEA provide for the neighborhood, local community and our visitors. I am satisfied that any and all environmental concerns will be mitigated their fullest extent, whether it be in the construction phase or the final build out. I fully endorse Tahoe Cross Country’s planned development.

Thank you for the opportunity to comment... Mark Boitano

Mark Boitano
mboitano@sbcglobal.net
 Cell 916-801-9327
 Hm 530-525-5565

I24-1

Letter I24 Mark Boitano

July 10, 2020

Response I24-1

The comment includes background information about the letter's author and expresses support for the analysis in the and for the proposed Project. The comment expresses the belief that the two impacts found to be significant could be adequately mitigated. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Huff](#)
To: [Terri Viehmann](#); [Dan Wilkins](#); [Judy Friedman](#); [John Pang](#); [Scott Zumwalt](#); [Gail Scoville](#)
Cc: [Sean Barclay](#); [Kim Boyd](#); [Matt Homolka](#)
Subject: ORAL COMMENTS ON TXC PROJECT DEIR FOR THE 17 JULY MEETING
Date: Sunday, July 12, 2020 10:46:44 AM

Letter I25

Dear Board Members,

Please ensure that the following public comments are read aloud and discussed during your 17 July meeting; and entered into the official project correspondence record:

Background: When initially proposed to the public, the vast majority of residents strongly favored replacing the current 2,465 sq. ft. *Highlands Community Center* building with the 4,607 sq. ft. historic Schilling lodge; to be available for "general "community functions" as well as those of tenants like the TXC. Since then, the project has: more than doubled in size, added a much larger parking area, included massive interior alterations and additions designed for use by the applicant's members and commercial activities, and become much more controversial.

I25-1

Specific Draft Environmental Impact Report (DEIR) Comments: The following address specific actions to:

- Strengthen the EIR and subsequent documents,
- Make the project less controversial and vulnerable, and
- Better preserve the historic structure for use by a broader segment of our community as specified by its Donor and desired by Schilling family members.

I25-2

1. The DEIR inherited some errors identified in earlier documents, including: (a) using confusing and inconsistent names for the current *Highlands Community Center*, and (b) use of ambiguous terms that raise concerns about trying to hide that the proposed interior modifications and additions would be mainly designed for use by the applicant's members and commercial activities.

I25-3

2. The DEIR suggests exploiting guidance loopholes, hurrying to avoid more restrictive environmental regulations, and paying mitigation fees could be ways to reduce impacts in some areas; but Board Members are reminded:

I25-4

"Just because one *can* do something doesn't mean one *should* do it."

3. Separate sentences in the DEIR's *Project Description* section imply that: (a) this could be a privately-owned facility upon publicly-owned land, and (b) the TCCSEA would have control over event bookings at the new facility and the *Highlands Community Center*; either of which could become show-stoppers.

I25-5

- 4. The claim in the DEIR's *Aesthetics* section that: a 10,000 sq. ft. structure, a massive parking area, and associated commercial operations would have a "less than significant impact" on aesthetics in The Highlands *is not logical*.

I25-6
- 5. Assertions that the references cited in the DEIR'S *Hazards and Hazardous Materials* section could mitigate the impacts of locating hundreds of gallons of flammable fuels and other hazardous materials next to two schools with only one emergency response and evacuation route to a "less than significant level" *conflict with CEQA guidance* against allowing hazardous materials within ¼ mile of any school and *defy common sense*.

I25-7
- 6. The claim in the DEIR's *Public Services* section that adding up to 100 more vehicles a day onto a busy residential street and only emergency response and evacuation route for several schools would have a "less than significant" impact upon emergency response time *is not credible*.

I25-8
- 7. Assumptions in the DEIR's *Wildfire* section that: (a) the new facility would not attract more visitors, (b) most would be locals, and (c) the increased activities and large events would not increase fire risks in a "Very High Fire Severity Zone" *are much too subjective* to be used to evaluate public safety risks.

I25-9
- 8. The assertion in the DEIR's *Regulatory Setting* section that the project would qualify as "Rehabilitation" under the Interior Secretary's standards *is not valid* because the massive interior alterations and 6000+ sq. ft. of additions plus a basement obviously do not "retain the structure's historic character."

I25-10
- 9. *Transportation* subsection 3.5.3: (a) *ignores* multiple residents' requests that the DEIR specifically address the impacts the increased traffic would have on all the pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris between the schools and Heather Lane, and (b) makes *Trip Generation* assumptions that *are much too subjective* to be used as bases for decisions about Public Safety, Air Quality, Noise, etc.

I25-11
- 10. *Transportation* Impact 3.5-5 notes that construction of the Proposed Project could result in: lane/street closures, redirection of traffic, the staging of heavy vehicles, etc.; which *is not acceptable* for a residential neighborhood with two schools and only one emergency vehicle response and evacuation route.

I25-12
- 11. The claim in DEIR *Utilities* section 3.11.1 that, "No mitigation are required for Site D" *is incorrect*, because: (a) Both NTFPD Code and TRPA Policy prohibit any development without adequate water flow for both domestic use and fire protection, and (b) A recent wildfire proved that the system currently has serious limitations if faced with a major fire incident in the Site D area.

I25-13
- The *Titanic* was lost after decision-makers: neglected to resolve known problem areas, put their ambitions ahead of common sense, and failed to change course and speed in time to avoid colliding with the iceberg. It's time to put this project onto a less controversial course that: (a) better preserves this historic Old Tahoe treasure, and (b) benefits a much larger segment of our community; just like the Donor specified and the Schilling family members desire.

I25-14

Very sincerely,
 Roger and Janet Huff

Letter I25 Roger and Janet Huff

July 12, 2020

Response I25-1

The comment requests that the comment letter be read aloud and discussed during the July 17 public meeting. The comment provides background information and states that, as initially proposed with a 4,607 square foot building and to be available for general community functions and Tahoe XC, was strongly favored by residents. The comment notes that since then the Project has grown in size and become much more controversial. As noted under Section 3.3.4, "Public Meeting," below, a letter provided by Roger and Janet Huff was read aloud at the July 17 public meeting. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I25-2

The comment provides an introduction to the comment letter, stating that the comments are intended to strengthen the Draft EIR, make the Project less controversial, and better preserve the historic structure. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I25-3

The comment asserts that the Draft EIR included errors identified in earlier documents, such as the names for the Highlands Community Center. The comment also claims the document uses ambiguous terms related to the nature of the proposed modifications to the building. In the first paragraph on page 2-1 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," the Highlands Community Center is identified and is also defined as the Existing Lodge, "The current location of the Tahoe XC is near the north shore of Lake Tahoe (see Figure 2-1) at the Highlands Park and Community Center (Existing Lodge), located approximately 0.65 mile from the proposed Project location on a site off Polaris Road." Thus, "Highlands Community Center," "Community Center," and "Existing Lodge" are used interchangeably throughout the Draft EIR. See response to comment I10-3, which addresses concerns related to the nature of the proposed modifications.

However, to clarify that these terms are used interchangeably the "Executive Summary" chapter and Chapter 2 are revised in this Final EIR. These changes are presented below and in Chapter 2, "Revisions to the Draft EIR." The clarification does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 1 on page ES-1 of the Draft EIR is revised to read as follows:

The project applicant, the Tahoe Cross-Country Ski Education Association (TCCSEA), is proposing the Tahoe Cross-Country Lodge Replacement and Expansion Project (Project), which repurposes the historic Schilling Residence for use as a year-round recreation facility, with adequate size and site amenities to serve existing and future anticipated public recreation use. With implementation of the Project, the Highlands Park and Community Center (Community Center or Existing Lodge) would no longer serve as the lodge for the cross-country ski area; instead, the reconstructed Schilling Residence would serve that purpose. The Community Center would be retained in its current located and operated by the Tahoe City Public Utility District (TCPUD).

Paragraph 1 on page 2-1 of the Draft EIR is revised to read as follows:

The Tahoe Cross-Country Lodge Replacement and Expansion Project (Project) has three (3) distinct elements: (1) to relocate, expand, and adaptively reconstruct the historic Schilling residence into a new building (the Schilling Lodge), (2) to construct associated improvements, including a driveway and parking lot, utilities, landscaping, and outdoor community areas, and (3) to relocate the functions and operations of the Tahoe Cross-Country Center (Tahoe XC) to a new location. The current location of the Tahoe XC is near the north shore of Lake Tahoe (see Figure 2-1) at the Highlands Park and Community Center (Community Center or Existing Lodge), located approximately 0.65 mile from the proposed Project location on a site off Polaris Road.

This comment does not provide any specific evidence that related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I25-4

The comment suggests the Draft EIR exploits guidance loopholes, hurries to avoid more restrictive environmental regulations, and pays mitigation fees to reduce impacts in some areas. To implement the Project, the analysis of potential environmental impacts of the Project were analyzed consistent with Section 15126.2 of the State CEQA Guidelines and, where required to reduce potentially significant impacts, mitigation measures were identified consistent with Section 15126.4 of the State CEQA Guidelines. Additionally, as discussed on page 3-2 of the Draft EIR:

Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement as part of the project definition, leaving little discretion in its implementation, and would avoid an impact or maintain it at a less-than-significant level, the environmental protection afforded by the regulation is considered before determining impact significance.

Thus, where applicable throughout the analysis of resource impacts in Sections 3.2 through 3.11 of the Draft EIR, regulations or policies that apply to the Project are described and where implementation of existing regulations or policies would not sufficiently avoid a potentially significant impact, mitigation measures are identified and required to be implemented by the proposed Project. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I25-5

The comment expresses concern related to ownership of the Schilling Lodge and control over event bookings at the Schilling Lodge and Highlands Community Center. See response to comment I10-1, which addresses the concern about lodge ownership. See response to comment I10-2, which addresses the concern related to event bookings. The comment expressed is not a topic that requires analysis in the EIR under CEQA.

Response I25-6

The comment expresses disagreement with the statement made in Section 3.2.1 of the Draft EIR that the proposed Project would have a less-than-significant impact on aesthetics in the Highlands neighborhood. See response to comment I10-5, which addresses concerns related to aesthetic impacts from the Project. This comment does not provide any specific evidence to support their claim that the Project's impact on aesthetics in the Highlands neighborhood would not be less than significant. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I25-7

The comment asserts that CEQA guidance does not allow hazardous materials within 0.25-mile of a school and states the Draft EIR's analysis conflicts with this guidance. Appendix G of the State CEQA Guidelines asks if a project would "emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school." This question is generally interpreted to require the acknowledgement of the presence of these conditions near schools and if there would be a potentially significant impact, the Project would be required to identify and implement all feasible mitigation measures to reduce those hazards. However, as discussed under Section 3.2.3, "Hazards and Hazardous Materials," on pages 3-9 through 3-10 of the Draft EIR and in response to comment I10-6, compliance with regulations governing the use, storage, transport, and disposal of hazardous materials would avoid or minimize any potential impact; thus, no additional mitigation is required. Response to comment I10-6 also explains that the Project and its use of fuel at either the proposed Project site or Alternative A site is an allowable use.

The use and storage of hazardous materials does occur at the schools adjacent to the proposed Project site. Although the building formerly used as a "bus barn" is not currently used to store buses, the building does store a 30-gallon diesel tank and other hazardous materials are stored at the schools or in the bus barn, such as cleaners, fuel, and fertilizer (Rivera, pers. comm., 2020). Additionally, chemicals are stored onsite for use in science labs. Again,

although Appendix G of the State CEQA Guidelines asks whether a project would emit or handle hazardous or acutely hazardous materials near a school, schools themselves may use, store, and/or handle hazardous materials, like that which currently occurs at the North Tahoe High School and North Tahoe Middle School.

The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I25-8

The comment disagrees that allowing up to 100 more vehicles per day onto the only emergency response and evacuation route for the schools would be a less-than-significant impact. The comment is inaccurate in its characterization of the number of new Project-generated trips. Please see page 3.5-13 through 3.5-17 of the Draft EIR for a detailed description of the trip generation. See response to comment I10-7, which addresses concerns related to additional vehicle traffic from the Project and potential impacts related to emergency response and evacuation. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-9

The comment asserts that the assumptions made in Section 3.2.9, "Wildfire," in the Draft EIR that the proposed facility would not attract more visitors, most visitors would be local, and the increased number of activities and large events are too subjective to be used to evaluate increased wildfire risks. The comment's statement that the Draft EIR states the proposed facility would not attract more visitors is incorrect (see response to comment I10-8). Also see response to comment I10-8, which discusses other rationale used to support the Draft EIR's conclusion that the proposed Project would not exacerbate wildfire risks. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-10

The comment is related to the potential for the proposed Project to qualify as "Rehabilitation" under the Secretary of the Interior's Standards. See response to comment I10-10, which describes the guidance for "Rehabilitation" under the Secretary of Interior's Guidelines. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-11

The comment expresses concern that the Draft EIR does not address requests by multiple residents that the safety risks associated with increased traffic would have upon pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris Road between the schools and Heather Lane be analyzed. The comment also asserts the trip generation assumptions used as the basis of the public safety, air quality, and noise analyses in the Draft EIR are too subjective.

See response to comment O1-3, which addresses concerns about the approach used to develop the trip generation assumptions used in the Draft EIR.

See Master Response 1: Transportation Safety, which addresses concerns related to traffic safety associated with the Project.

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-12

The comment asserts that it is not acceptable to have lane/street closures, redirection of traffic, or staging of heavy vehicles on residential streets as referred to in Impact 3.5-5 of the Draft EIR. See response to comment I10-12, which addresses concerns regarding construction-related traffic impacts. The comment's assumption that heavy vehicles would be staged on residential streets is inaccurate.

Response I25-13

The comment asserts that the claim in Section 3.1.1 of the Draft EIR that no mitigation measures would be required is incorrect because TRPA Policy and NTFPD Code prohibits development if there is not adequate water for domestic use and fire protection and in light of a recent wildfire in the neighborhood. See response to comment I10-16, which addresses concerns related to water supply and regarding the wildfire mentioned in the comment. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-14

The comment notes the desire to put the Project onto a less controversial course that preserves the historic building and benefits a larger segment of the community, as specified and desired by the Schilling family members. See comment letter I75 from a member of the Schilling family that expresses support for the Project. See responses to comments I10-10, I35-4, I41-23, and PM1-4, which provide rationale to support the conclusions in the Draft EIR that there would be no significant impact to the historical significance of or alter the historic character of the Schilling residence. See responses to comments I10-2 and I10-4 that provide rationale that the Project would serve community uses. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Ted Gomoll](#)
To: [Kim Boyd](#)
Subject: T C Cross Country Project
Date: Monday, July 13, 2020 10:01:21 AM

Letter I26

Kim,

I plan on attending the meeting this Friday (virtual). Could you send instructions. I have one question and two comments. The question is how will the project be paid-hopefully not a PUD assessment on Tahoe City homeowners. The comments are: Please have all construction traffic access via Village, not Old Mill. Second, can construction take place on weekdays only, no weekend work.

I26-1

I26-2

Regards,
 Ted Gomoll

Sent from [Mail](#) for Windows 10

Letter I26 Ted Gomoll

July 13, 2020

Response I26-1

The comment asks TCPUD how the Project would be paid for and notes that hopefully it would not be funded by a TCPUD assessment on Tahoe City homeowners. How the Project is funded is not a topic that requires analysis in the EIR under CEQA; thus, no further response is required. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I26-2

The comment requests that construction traffic access the Project site via Village Road instead of Old Mill Road and requests that there would be no construction on weekends. Construction vehicles would likely use the most logical access point to the site, either by Village Road or Old Mill Road, and the comment does not identify any specific issues that relate to this topic and the adequacy of the Draft EIR. As discussed under Section 2.5.3, "Construction Schedule and Activities," on page 2-22 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," construction activities would occur during daytime hours exempt from noise standards by TRPA, which allows for weekend work. At this time it cannot be guaranteed that construction activities would not occur on the weekend; however, this could be a condition of Placer County's building permit. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Julie Maurer](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Monday, July 13, 2020 5:55:02 PM

Letter
I27

I believe the scope of the review is complete and adequate for the project and serves the public interest well. Conclusions in the EIR are well founded and any potentially significant impacts can be mitigated.

I am in support of the adequacy of the EIR and of the project moving forward. Thank you.

Julie Maurer

I27-1

Letter I27 Julie Maurer
July 13, 2020

Response I27-1

The comment expresses support for the analysis in the Draft EIR and for the proposed Project. The comment expresses the belief that the significant impacts could be mitigated. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Kim Boyd, Senior Management Analyst
Tahoe City Public Utility District
Sent via email: kboyd@tcpud.org

Letter
I28

Subject: Tahoe XC Draft EIR

Dear Kim,

I would like to offer this letter of support for the Tahoe Cross Country Ski Education Association Tahoe Cross Country Lodge Replacement and Expansion Project as proposed (Site D). I have reviewed the EIR and believe that the EIR is adequate. While there are some impacts that are listed as 'significant', it appears that those impacts can be mitigated.

I would also like to commend the Tahoe City PUD for taking the lead in this project. As a resident of Tahoma, CA., in the TCPUD service area, Tahoe City is our 'hometown'. As such, and as a 35-year resident, it has been interesting to observe how the town has been in decline for some number of years. It can be argued that the decline is partly in response to the buildup of both Truckee and Squaw Valley. Still, Tahoe City has an incredibly unique 'signature' as a small mountain town with plenty of character, both realized and potential. I strongly believe that this Lodge, which repurposes an historic building, will add a great deal to that character. It will also restore a beautiful and significant architectural gem in the Shilling Lodge. It seems obvious that this lodge replacement project can and should be a piece in a larger plan to help Tahoe City and the surrounding area realize its great and unique potential as an outdoor recreation area where we, as residents, and guests from out of town, can come and experience what the natural world has to offer.

I28-1

I realize also that some residents of the area may be impacted by this lodge. However, many individuals will also have the current impact of the existing lodge reduced as focus shifts elsewhere. In the end, I hope that all realize what a benefit this lodge will be to our community as a whole and especially to the young people of our community who find such wholesome outdoor recreation at the Tahoe Cross Country Center. The new location can only make a good operation world class and something we can all be proud of.

Thank you for your consideration,



Michael Hogan

Letter I28 Michael Hogan

July 14, 2020

Response I28-1

The comment includes background information about the letter's author and expresses support for the analysis in the Draft EIR and for the proposed Project. The comment expresses the belief that the impacts found to be significant could be adequately mitigated. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Cindy Owens](#)
To: [Kim Boyd](#)
Cc: ["Bob Owens"](#)
Subject: Tahoe Cross-Country Draft EIR
Date: Tuesday, July 14, 2020 9:02:00 AM

Letter I29

To:
Tahoe City Public Utility District
Kim Boyd, Senior Management Analyst
PO Box 5249, Tahoe City, CA 96145

As homeowners in the Highlands neighborhood, we support the Tahoe Cross-Country Lodge Replacement and Expansion Project and have reviewed the Draft Environmental Impact Report found on the TCPUD website. We believe the report adequately documents the project's impact to the region.

I
|
I29-1
|

The finished project will be a great addition to the region.

Thank you,
Robert and Cindy Owens
3075 Watson
Tahoe City, CA 96145-7916

Letter I29 Robert and Cindy Owens

July 14, 2020

Response I29-1

The comment includes background information about the letter's author and expresses support for the analysis in the Draft EIR and for the Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Thomas, Randolph](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Tuesday, July 14, 2020 3:19:10 PM

Letter I30

Dear Ms. Boyd and TCPUD Board Members:

I have been visiting the Tahoe Basin for over 50 years for summer and winter activities, and my wife and I are now fulltime residents of Tahoe Pines. The Historic Schilling Lodge Project very much reflects my vision of Lake Tahoe and the celebration of heritage and pursuit of excellence. The historic homes, like Schilling, Vikingsholm, Hellman-Ehrman Estate, Pope Estate, and others offer a glimpse into the past and suggest a standard of who we still want to be with regard to tradition and values. Outdoor activities are a popular reason people come to the Lake Tahoe area, and ever since the first native American visitors and much later the hosting of the 1960 Olympics, this area has offered people of all ages a sense of potential for personal achievement and well-being. The Schilling Lodge would serve as an attractive, powerful gateway to the outdoors and these ideals.

The Historic Schilling Lodge Project represents the best of Tahoe tradition, and I believe, inspires the best in us, young and old, visitors and residents alike. The possibility to locate this facility in proximity to the North Tahoe High School and Middle School should help attract many students towards healthy and active activities, as opposed to sedentary lifestyle all too popular among many in today's world. In summary, this is a very unique opportunity to provide the community with an important year-round facility that reflects our values and will enhance our region for generations to come.

Sincerely,
 Randy & Barbara Thomas

R. W. Thomas
 4140 Interlaken Road, Tahoe Pines
 (530) 807-7566

I30-1

Letter I30 Randy and Barbara Thomas

July 14, 2020

Response I30-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, and expresses support for the proposed Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Dave Wilderotter](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Tuesday, July 14, 2020 1:54:36 PM

Letter I31

To whom it may concern:

I've read the draft EIR and have concluded to my satisfaction that it was done appropriately. It has answered my questions and concerns. Possible mitigation measures have been addressed. All in all a thorough and professional report.

I
I31-1

Dave Wilderotter
Tahoe Dave's

Sent from my Verizon, Samsung Galaxy smartphone

Letter I31 Dave Wilderotter
July 14, 2020

Response I31-1

The comment expresses support for the completeness and analysis in the Draft EIR. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Kim Boyd](#)
To: [Kim Boyd](#)
Subject: FW: Questions and comments regarding proposed TXC project DEIR
Date: Wednesday, July 15, 2020 11:32:44 AM
Attachments: [Untitled attachment 02037.txt](#)
[Untitled attachment 02040.txt](#)
[Untitled attachment 02043.txt](#)
[Untitled attachment 02046.txt](#)
[Untitled attachment 02049.txt](#)

Letter I32

Kim Boyd
Senior Management Analyst
Tahoe City Public Utility District
530.580.6286 Direct
530.583.3796 Main Office ext. 386
www.tcpud.org

-----Original Message-----

From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
Sent: Tuesday, July 14, 2020 10:33 PM
To: Terri Viehmann <tviehmann@tcpud.org>; Dan Wilkins <d.wilkins@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; John Pang <jpang@tcpud.org>; scottzumwalt@gmail.com; Gail Scoville <gscoville@tcpud.org>
Cc: Sean Barclay <sbarclay@tcpud.org>; kboyd@tcpud.com; Matt Homolka <mhomolka@tcpud.org>
Subject: Questions and comments regarding proposed TXC project DEIR

Dear Board Members,

I would appreciate it if the following questions and comments are read aloud and discussed during the upcoming Board meeting. I I32-1

1. Does the DEIR consider the dangerous winter traffic conditions on Old Mill Road? We have provided comments and photos of winter accidents to the Board in January. Some photos are included again. Does the Board consider increasing winter traffic on Old Mill in the interests of public safety? Of either residents or visitors to the TXC? How can Appendix D conclude that the proposed site D wouldn't result in a significant traffic safety impact? I I32-2

2. Is there a construction budget and operating budget for this project? What are the financial consequences of low snow years for TXC? What are the consequences of significant operating deficits? I I32-3

3. What regulatory approvals are required for the construction and coverage of a large building and significant paving of meadow and forest and tree removal? Have they been sought? I I32-4

Thank you,

Carol Pollock
405 Old Mill Road

From: [Matt Homolka](#)
To: [Kim Boyd](#)
Subject: FW: Questions and comments regarding proposed TXC project DEIR
Date: Friday, July 17, 2020 11:23:27 AM

Matt Homolka, P.E.
 Assistant General Manager/District Engineer
 Tahoe City Public Utility District
 530.580.6042 Direct
 530.583.3796 Main Office ext. 342
www.tcpud.org

-----Original Message-----

From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 Sent: Friday, July 17, 2020 9:10 AM
 To: Matt Homolka <mhomolka@tcpud.org>
 Subject: Re: Questions and comments regarding proposed TXC project DEIR

Matt. Thanks so much. I'm on the meeting but cannot participate after 10. Thus may not be present for oral comments

If you would, just read the first two points. Thank you.

Sent from my iPhone

> On Jul 17, 2020, at 8:14 AM, Matt Homolka <mhomolka@tcpud.org> wrote:

>
 > Carol, I need to know whether you wish to make an oral comment
 > yourself and for me to not read your email as soon as possible. If I
 > do not hear from you, I will assume that to be the case and will not
 > read your email. Thanks,

>
 > Matt Homolka, P.E.
 > Assistant General Manager/District Engineer Tahoe City Public Utility
 > District
 > 530.580.6042 Direct
 > 530.583.3796 Main Office ext. 342
 > www.tcpud.org

>
 >
 >
 > -----Original Message-----

> From: Matt Homolka
 > Sent: Thursday, July 16, 2020 4:50 PM
 > To: Carol Pollock <carol_pollock@sbcglobal.net>
 > Cc: Sean Barclay (sbarclay@tcpud.org) <sbarclay@tcpud.org>; Terri
 > Viehmann (tviehmann@tcpud.org) <tviehmann@tcpud.org>; Kim Boyd
 > (KBoyd@tcpud.org) <KBoyd@tcpud.org>

I32-5

> Subject: RE: Questions and comments regarding proposed TXC project
 > DEIR
 >
 > Carol, you can always provide written comments at any time before the July 24th deadline.
 > If you would prefer to speak for yourself during the meeting, please confirm that is your plan and I will not read your email.
 > Thank you,
 >
 > Matt Homolka, P.E.
 > Assistant General Manager/District Engineer Tahoe City Public Utility
 > District
 > 530.580.6042 Direct
 > 530.583.3796 Main Office ext. 342
 > www.tcpud.org
 >
 >
 >
 >
 > -----Original Message-----
 > From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 > Sent: Thursday, July 16, 2020 4:46 PM
 > To: Matt Homolka <mhomolka@tcpud.org>
 > Subject: Re: Questions and comments regarding proposed TXC project
 > DEIR
 >
 > Matt thank you. If this is it, I would be happy to edit to more fully cover my concerns. Or, tear this up and I will take three minutes? Fine either way.
 >
 > Sent from my iPhone
 >
 >> On Jul 16, 2020, at 3:45 PM, Matt Homolka <mhomolka@tcpud.org> wrote:
 >>
 >> Carol,
 >>
 >> Thank you for your comments. We have discussed your request with the Board president. Given the difficulties of our current situation, she has agreed to allow a staff member to read your email during the public comment portion of the subject item. A few things to note:
 >>
 >> * Your email will be read verbatim. However, emphasis added by formatting or attachments will not be provided.
 >> * Oral public comments are limited to 3 minutes. Staff will cease reading your comments when that limit is reached.
 >> * Oral public comments are limited to 1 per person. This will be your one oral public comment. Please do not attempt to augment them during the meeting.
 >> * Regardless, the entirety of your emailed comments will be treated as a written comment on the draft EIR for the Tahoe XC Lodge Replacement and Expansion Project and will be responded to completely in the Final EIR.
 >>
 >> Sincerely,
 >>
 >> Matt Homolka, P.E.
 >> Assistant General Manager/District Engineer Tahoe City Public Utility
 >> District
 >> 530.580.6042 Direct
 >> 530.583.3796 Main Office ext. 342
 >> www.tcpud.org
 >>
 >>

I32-5
 cont.

>>
 >> -----Original Message-----
 >> From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 >> Sent: Tuesday, July 14, 2020 10:33 PM
 >> To: Terri Viehmann <tviehmann@tcpud.org>; Dan Wilkins
 >> <d.wilkins@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; John Pang
 >> <jpang@tcpud.org>; scottzumwalt@gmail.com; Gail Scoville
 >> <gscoville@tcpud.org>
 >> Cc: Sean Barclay <sbarclay@tcpud.org>; kboyd@tcpud.com; Matt Homolka
 >> <mhomolka@tcpud.org>
 >> Subject: Questions and comments regarding proposed TXC project DEIR

>> Dear Board Members,

>> I would appreciate it if the following questions and comments are read aloud and discussed during the upcoming Board meeting.

>> 1. Does the DEIR consider the dangerous winter traffic conditions on Old Mill Road? We have provided comments and photos of winter accidents to the Board in January. Some photos are included again. Does the Board consider increasing winter traffic on Old Mill in the interests of public safety? Of either residents or visitors to the TXC? How can Appendix D conclude that the proposed site D wouldn't result in a significant traffic safety impact?

>> 2. Is there a construction budget and operating budget for this project? What are the financial consequences of low snow years for TXC?

>> What are the consequences of significant operating deficits?

>> 3. What regulatory approvals are required for the construction and coverage of a large building and significant paving of meadow and forest and tree removal? Have they been sought?

>> Thank you,

>> Carol Pollock
 >> 405 Old Mill Road

>>
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 >>
 >>
 >>
 >

I32-5
 cont.

Letter I32 Carol Pollock

July 17, 2020

Response I32-1

The comment requests that the comment letter be read aloud and discussed during the July 17 public meeting. As noted under Section 3.3.4, "Public Meeting," below, a letter provided by Carol Pollock was read aloud at the July 17 public meeting. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I32-2

The comment asks whether the Draft EIR considers the dangerous winter traffic conditions on Old Mill Road. The comment notes that comments and photos of winter accidents were provided to the Board in January. Additionally, the comment asks whether the Board considers increasing winter traffic on Old Mill Road in the interests of public safety. Finally, the comment asks how Appendix D could conclude that the proposed site D would not result in a significant traffic safety impact.

As described in Master Response 1: Transportation Safety, the Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and historical crash data analysis. The historical crash data included the winter months, and based on the analysis presented in the Section 7, "Transportation Safety Analysis," of the Transportation Impact Analysis and was summarized in Master Response 1: Transportation Safety. As discussed further in Master Response 1, the safety analysis determined that no undue transportation safety-related concerns related to conditions along Old Mill Road are expected to result with implementation of the proposed Project because, based on historical crash data, the crash severity on Old Mill Road has been relatively low; TRPA's Lake Tahoe Region Safety Strategy study did not identify Old Mill Road as a priority location for safety improvements; and although the proposed Project would increase traffic on Old Mill Road, the resulting daily traffic volumes would not exceed the County standards for traffic volumes on a residential street. The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during review of the merits of the Project.

Response I32-3

The comment asks if there are construction and operating budgets for the Project, what the financial consequences of low snow years would be for Tahoe XC, and what the consequences would be of significant operating deficits. The financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I32-4

The comment asks what regulatory approvals are required for construction of the Project and tree removal and if they have been sought. A summary of the permits and approvals that are required for the Project is provided in Section 1.3, "Required Permits and Approvals," in Chapter 1, "Introduction," of the Draft EIR. These include permits or approvals by TRPA, the Conservancy, Placer County, Lahontan RWQCB, PCAPCD, SHPO, NTFPD, TCPUD, and Tahoe-Truckee Sanitation Agency. TRPA would approve a permit for tree removal for the Project. The EIR must be approved prior to the applicant seeking additional regulatory approvals or permits from the applicable agencies. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I32-5

The comment requests that comments submitted by the letter's author be read during the public meeting on July 24. These comments are identical to comments I32-1 through I32-4. See responses to comments I32-1 through I32-4. As noted under Section 3.3.4, "Public Meeting," below, a letter provided by Carol Pollock was read aloud at the July 17 public meeting. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

From: [Monica Grigoleit](#)
To: [Kim Boyd](#)
Subject: Schilling Lodge
Date: Wednesday, July 15, 2020 4:02:30 PM

**Letter
I33**

Hi Kim,

I have several questions about the Schilling Lodge:

- 1) Who will be funding the Lodge after the first year? I I33-1
- 2) Will there be speed bumps put on Polaris, Old Mill and Village or any other necessary streets in the Highlands to accommodate more traffic down those streets? I I33-2
- 3) Will private functions be allowed at the Lodge? Or excess of public functions that increases traffic? I I33-3
- 4) Will the public housing project be downsized to accommodate the further impact on the Highlands neighborhood? I I33-4

Thank You,
Monica Grigoleit
3180 Watson Drive

Letter I33 Monica Grigolet

July 15, 2020

Response I33-1

The comment asks who will be funding the Schilling Lodge after its first year. The financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I33-2

The comment asks whether there will be speed bumps put on Polaris Road, Old Mill Road, and Village Road or any other necessary streets in the Highlands neighborhood to accommodate more traffic down those streets.

There are no speed bumps proposed as part of the Project. The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I33-3

The comment asks if private functions would be allowed at the Schilling Lodge or if there would be public functions that would increase traffic. Public and private events that could be held at the Schilling Lodge are described under "Special Events" beginning on page 2-14 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR. Table 2-3 on page 2-13 identifies the maximum number of events, public or private, that could occur at the Schilling Lodge each year. As discussed under "Methods and Assumptions" beginning on page 3.5-12 in Section 3.5, "Transportation," and shown in Tables 3.5-2, 3.5-3, 3.5-4, and 3.5-5, the increase in visitors at the Schilling Lodge associated with events are considered in the transportation analysis. This comment does not provide any specific evidence that relates to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I33-4

The comment asks if the public housing project would be downsized to accommodate further impacts on the Highlands neighborhood. It is assumed that the comment is referring to the Dollar Creek Crossing project, which is identified as one of the cumulative projects analyzed in the cumulative analysis for the proposed Project and Alternative A (see Table 3.1-2 beginning on page 3-5 under Section 3.1.5, "Cumulative Setting," in the Draft EIR). Cumulative impacts are discussed in each resource section (Sections 3.3 through 3.12 of the Draft EIR), following discussions of the Project-specific impacts and consider the cumulative effects of the proposed Project and Alternative A combined with the Dollar Creek Crossing project along with other cumulative projects. This comment is not related to the proposed Project and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

From: [John Pang](#)
To: [Kim Boyd](#)
Cc: [Sean Barclay](#)
Subject: Comments on DEIR
Date: Wednesday, July 15, 2020 1:50:08 PM

Letter I34

Hi Kim,

Sean said to submit these comments about the DEIR to you directly. They don't need to be part of the official comments unless you feel they do...

I34-1

1) section 3-15: 3.2.9 regarding the building materials. I don't believe that the fire codes will allow any type of wood shake or shingle roof on the building.

I34-2

2) under the "utilities" section, page of 20:

Under the California Building Standards Title 24, 3rd paragraph, last sentence:

I would suggest deleting this as the City of South Lake Tahoe has no relevance in this project.

I34-3

3) I will send a screen shot of a typo in the LSC report. This program won't let me send it as part of this email.

I34-4

Thanks!!

John Pang

Get [Outlook for iOS](#)

Letter I34 John Pang

July 15, 2020

Response I34-1

The comment provides an introduction to the comment letter. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Response I34-2

The comment refers to Section 3.2.9, "Wildfire," on page 3-15 of the Draft EIR and states the belief that fire codes would likely not allow any type of wood shake or shingle roof on the building. The Schilling Lodge would use a product that best matches historic character of original roof but complies with applicable fire and building codes (Heapes, pers. comm., 2020). The Secretary of Interior's Guidelines for Rehabilitation (NPS 2020b) include provisions for rehabilitation of historic structures while also meeting the requirements of local codes related to life safety and resilience to natural hazards. Thus, construction of the Schilling Lodge utilizing a product that looks similar to the original wood shake roof but meets local fire code requirements would not result in a significant impact to the historical significance of or alter the historic character of the Schilling residence. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I34-3

The comment provides a correction to Section 3.11, "Utilities," to remove a reference to the City of South Lake Tahoe as it has no relevance to the Project. The comment is correct and Section 3.11 is revised in this Final EIR. The correction does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 3 on page 3.11-3 of the Draft EIR is revised to read as follows:

Where a local jurisdiction has not adopted a more stringent construction and demolition (C&D) ordinance, construction activities are required to implement Section 5.408 of the CALGreen Code. Under Section 5.408, construction activities are required to recycle and/or salvage for reuse a minimum of 65 percent of their nonhazardous C&D waste as of January 1, 2017. Applicable projects are required to prepare and implement a Construction Waste Management Plan, which is submitted to the local jurisdiction before issuance of building permits. Placer County ~~The City of South Lake Tahoe~~ does not currently have an adopted C&D waste management ordinance.

Response I34-4

The comment states the letter's author will send a screen shot of a typo in the LSC report. The comment letter does not include any attachments or screen shots of this typo. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate.

17 July 2020

Letter
I35

BOARD OF DIRECTORS - TCPUD

TAHOE CITY, CALIFORNIA 96145

Please ensure that the following public comments are read aloud and discussed during your 17 July meeting; and entered into the official project correspondence record:

It is sad that this project has come to fruition at all, existing so that yet another multi-millionaire could remove a historic home to build their modern lakefront estate, and try to glean a tax write-off by forcing it on a residential community of largely primary homeowners that does not need it, does not want it, and would prefer the Schilling Lodge have been left in its lakefront glory.

I35-1

1. This project, when initially proposed and finally communicated to the residents of the Highlands was 'sold' to us as a moderate expansion of the TXC building in 'Site A'. However, it quickly became obvious that there was a stated preference to relocate the lodge to the site off of Polaris adjacent to the High School and that in many ways this was a foreordained outcome. This is well documented in the TCPUD website where it is not even mentioned that Site A, the current location, is even under consideration. From the TCPUD website: *"the proposed Project involves replacing and relocating the lodge to a site off Polaris Road adjacent to the North Tahoe Middle/High School."*

I35-2

2. The project cites its desire to preserve the 'Historic Schilling Lodge' but then proposes to over double the size of the historic lodge to meet the needs of the TCCSEA. However, according to The Department of the Interior's Standards for the Treatment of Historic Properties With Guidelines For Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, page 25, "A new exterior addition to a historic building should be considered in a rehabilitation project only after determining that requirements for a new or continuing use cannot be successfully met by altering non-significant interior spaces. "

I35-3

3011 Polaris Rd, Tahoe City, California 96145

The deployment of the Schilling Lodge at Site A would allow for the use of the current site and out-buildings plus the incremental, non-modified 4,607sf building to meet the usage requirements and maintain compliance with the Department of the Interior's regulations.

I35-3
cont.

The choice of Site D/Polaris and the expansion of the Schilling lodge intentionally is non-compliant with these regulations for preserving this historic structure.

3. The Schilling Lodge was a Lakefront Property, and again, in accordance with the Department of the Interior's Standards for the Treatment of Historic Properties With Guidelines For Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, page 66: Not Recommended: "Removing or relocating historic buildings or landscape features, thereby destroying the historic relationship between buildings and the landscape in the setting." and "Altering those building and landscape features of the setting which are important in defining its historic character so that, as a result, the character is diminished."

I35-4

In this project the Schilling Lodge is being relocated from a prominent lakefront venue in Homewood and being altered in clear violation of the Department of the Interiors standards.

4. The project 'needs' cite that higher elevations trails tend to hold snow longer and extend the cross-country skiing season. While this is, at its most simple interpretation correct, the altitude difference between Site A and Site D is 76 feet. The current pace of advancing temperatures due to global climate change marginalize the efficacy of this argument – in order to provide a viable long-term investment for Tahoe XC the facility would need to be completely re-sited at approximately 7500-8000' in order to provide a 20-30 year viable usage. Anything less than this compromises the entire financial model of the project.

I35-5

5. Private Event Usage: The current plan envisions up to 34 annual private events that could include weddings, rehearsal dinners, and other activities running every weekend in the spring, summer, and fall at the Schilling Lodge. These events, at which alcohol would most likely be served would be within a few hundred feet of a High School. Additionally, they would be in a residential neighborhood with many small children and families. This project proposes to reclassify residential zoned lots on Polaris Rd and utilize them for commercial purposes and puts drivers, likely to be under the influence of alcohol following weddings and rehearsal dinners on dark streets, with no speed controls, and no sidewalks.

I35-6

Any usage of the Schilling Lodge in Site A or Site D should completely ban the selling, serving, and private consumption of alcohol and any controlled substances – especially if located next to academic institutions.

6. COVID-19 Concerns. In the current pandemic climate and with no near-term end in sight to the limitations of public gatherings, as evidenced by the streaming of this TCPUD meeting and a worsening of the crisis across the US and in California we should be significantly re-evaluating any commercial venture that is predicated on gatherings and high-density human interactions for its ongoing sustainability and success.

I35-7

This project needs to be thoroughly reconsidered in lite of social distancing guidelines and should be re-evaluated based on its dense packing of people into a large number of financially necessary private and public gatherings.

7. Figure 2-5, Proposed Site Plan: It is non-obvious as to why this project is not trying to share parking with NLTHS which would maintain compliance with Placer County Tahoe Area Basin Plan requirements for shared parking.

I35-8

8. Project Goals: "Construct a new lodge that minimizes effects on the neighborhood." The consolidation of both the North Lake Tahoe Middle/High School and Tahoe XC as well as the planned event-space usage of the lodge does not, in any way, minimize the effect on the neighborhood. The following must be considered:

I35-9

	Polaris Site	Current Site	Comments
Impact 3.3-2: Tree Removal	183 Trees Removed	79 Trees Removed	230% more trees killed in Polaris Site
Impact 3.5-5: Construction-Related Impacts on Traffic	Single roadway, no sidewalks, heavily used by walking/biking students as primary way to/from school	Multiple ingress/egress paths during emergency by usage of the paved multi-use path, and it is not a common pedestrian street due to no school transit.	Polaris Site is impossible to support heavy construction with 'lane closures and detours' per DEIR recommendation.
Impact 3.8-1: Construction Noise	Construction noise would impact students learning and local households	Construction Noise impacts local households	

I35-10

I35-11

I35-12

<p>Impact 3.8-2: Construction Vibration</p>	<p>New roadway passes less than 50' from Polaris households</p>	<p>No new driveway/roadways</p>	<p>Polaris Site would cause significant potential impact to adjacent homes, what is damage/loss coverage for this project and indemnification plan?</p>	<p>I35-13</p>
<p>Impact 3.8-3: Operational Event Noise</p>	<p>Significant Impact to households and to students</p>	<p>Significant Impact to Households</p>	<p>While the Polaris site has a greater impact neither side of the Highlands neighborhood is in favor of late-night events with amplified music such as weddings, parties, retreats, and such in a residential zoned area. The ~70 decibel standard at 50 feet is the equivalent of standing 25 feet from a freeway with cars going 65mph.</p>	<p>I35-14</p>
<p>Parking</p>	<p>1.5 acres of asphalt coverage for 100 cars and 2 buses</p>	<p>1 acre of asphalt coverage for 100 cars and 2 buses</p>	<p>Reusing the current site is 30% less TRPA coverage and far more environmentally friendly. However, Site D could be implemented with no driveway or dedicated parking and just reuse shared parking with NLTHS – which would be a smart alternative and</p>	<p>I35-15</p>

			be compliant with Policy T-P-13 of the Area Plan, which states that Placer County shall encourage shared-parking facilities to more efficiently utilize parking lots.	I35-15 cont.
New Land Coverage	81,593 sq. ft.	67,619 sq. ft.	Site A, in total saves approximates ¼ acre of total land coverage and about 20% less than Site D.	I35-16
Traffic - Velocity	<p>“The majority of speeds recorded on Polaris Road are above the speed limit”</p> <p>“The maximum recorded speed was 42 mph.”</p> <p>There have been multiple police reports in the spring of 2020 for vehicles exceeding 50mph on Polaris Rd enroute to/from the NLTHS.</p>	<p>“The recorded speeds on Village Road were generally lower than the speed limit”</p> <p>“The average observed speed was 18 mph”</p>	<p>Polaris Rd is already dangerously fast, highly trafficked, and has a higher number of pedestrians and students and bikers on it than Village Rd.</p> <p>The Proposed site threatens the lives of students and residents due to the high speeds and lack of pedestrian facilities on Polaris Rd.</p>	I35-17

Traffic – Trip Generation	149 Vehicle Trips (Winter Weekend Daily Net)	117 Vehicle Trips (Winter Weekend Daily Net)	27% more trips at Site D than Site A	I35-18
Traffic - Current	1,370 Average Daily Trips – Weekday 183 Weekend ADT 7,216 AWT	499 ADT – Weekday 815 Weekend ADT 4,125 AWT	Currently Polaris has 74.9% more traffic on a weekly basis than Village (Site-A).	I35-19
Traffic – Proposed Site D	9,554 Average Weekly Trips	2,715 Average Weekly Trips	The proposed plan results in a significant imbalance in traffic load on Polaris vs Village – with Polaris growing from 74.9% more traffic to 351% more traffic than Village. It is exceedingly likely that peak days will result in more than 2500 daily trips in Polaris which is the maximum sustainable for a residential street per guidelines.	I35-20

9. Minimum Sight Distance for Driveway on Polaris: While we have already discussed that the proposed driveway on Polaris and the re-zoning of residential lots for a commercial use-case is an inherently bad idea that could be mitigated by reusing the NLTHS parking facilities it is also worth noting that the proposed driveway

does not meet the engineering standards for Minimum Sight Distance for stopping due to the natural curvature and high berms on the north side of Polaris Rd.

“Due to the horizontal curvature and existing embankments on the northern side of Polaris Road, the sight distance looking east would be approximately 250 feet; and thus, would not meet the minimum corner sight distance standard.”

The project however, then notes that a 30mph vehicle can stop in 200’ as a fallback to expedite this haphazard and unsafe project. While this may be true on dry roadways it is worth noting a few factors for fair consideration by the TCPUD:

- Polaris Road is naturally sloped and often drains across the roadway resulting in wet roadway conditions.
- Peak days for XC skiing are often days that have both fresh snow, ice, and melted runoff.
- Polaris Road already experiences higher than normal traffic volumes for a residential street and the speeds on it were clocked at up to 42mph during a one-day study and police reports indicate that speeds of >50mph have been commonplace.

Failure to adhere to Department of Transportation Sight Stopping Distance guidelines and the Caltrans Highway Design Manual guidelines will further endanger the lives of residents, students, and pedestrians on this already crowded street. Shockingly this was deemed to be ‘Less than Significant’ by the consultants engaged.

10. Zoning and Land Use Designation – when reviewing the alternative sites it became apparent that many of the alternative locations were removed from consideration for good reason. Good reason being, “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.” However, the primary choice, preferred by the TCCSEA, Site D – Polaris Rd, also requires that a commercial driveway be placed on residentially zoned and designated land – the two lots adjacent to 3011 Polaris Rd.

I35-21
cont.

I35-22

Summary:

The obvious preference from myself and many other residents of the Highlands is simply, 'No Project'. This is an unwanted interference in a primarily single-home, primary residence community of citizens of Tahoe City. We kindly ask that the TCPUD cancel this project and that the multi-millionaire Bay Area developer who decided to build a lakefront home and ruin a historical lodge on the West Shore return it to its lakefront setting and maintain compliance with the Department of the Interior's Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings. There are several lakefront lots available for purchase in the Tahoe City and Dollar Point area that would be outstanding for the Schilling Lodge.

I35-23

Per the EIR Section 4-8, Page 326: "the No Project Alternative would be the environmentally superior alternative."

I35-24

If for some reason the TCPUD board decides to continue this misbegotten project it is worth documenting that every metric on impact favors maintaining Site A the current location over Site D the Polaris location. It is hard for me to imagine that 76' of elevation gain and a slightly flatter starting area is worth:

- Increased traffic to almost residential street maximums
- Increased ground cover in a pristine meadow and wooded area
- Increased tree removal, many of which are mature old growth conifers
- Clear violation of land use zoning and covenants
- Increased danger to students and pedestrians – common on Polaris
- The consistent and ready introduction of alcohol and other controlled substances in close proximity to an education institution.

I35-25

And failing this, if Site D is chosen – at least honor and align with the Placer County Tahoe Area Basin Plan that designates the two lots (3013/3015) on Polaris Road as Residential Zoned and comply with the Placer County Tahoe Area Basin Plan, page 88, guidance on the use of 'shared parking' by removing the large paved area and sharing the parking facilities with NLTHS.

Thank you for your time and consideration.

SINCERELY,
DOUGLAS GOURLAY

Letter I35 Douglas Gourlay

July 17, 2020

Response I35-1

The comment expresses opposition to the Project and opinions related to the use of the historic Schilling residence. The comment also requests the comments be read aloud at the public meeting on July 17. This comment letter was not read aloud during the public meeting because the author himself provided oral comments (see response to comments PM1-4 through PM1-9). The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-2

The comment provides background information related to the development of the Project and presents the belief that there was a preference for relocating the lodge to the proposed Project site (Site D). The comment notes the TCPUD website does not mention Site A is under consideration.

As described on page ES-2 in the "Executive Summary" chapter (and also on page 2-1 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail"), "Site D – Full Project (proposed Project) is the "proposed project" for purposes of CEQA, and is the project described in the project description of this EIR consistent with State CEQA Guidelines Section 15124." CEQA requires that the EIR identify a proposed project. Because of the controversial nature of the Project, TCPUD elected to analyze an alternative to the proposed Project at an equal level of detail to the analysis of the proposed Project (see page 2-1 of the Draft EIR):

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 could include 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 the ultimate decision of the TCPUD Board.

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-3

The comment states that deploying the Schilling Lodge at Site A would allow adaptive reuse of the Schilling residence without alterations and therefore selection of Site D as the proposed Project is intentionally non-compliant with the Secretary of the Interior's Standards. The comment is suggesting an additional alternative for evaluation and asserts that the proposed Project and expansion of the Schilling Lodge is non-compliant with the Secretary of the Interior's Standards. See response to comment I10-18, which discusses the analysis of alternatives in the Draft EIR, including alternatives with limited expansion to the original Schilling residence. See responses to comments I10-10, I35-4, and I41-23, which address the comment's concerns related to the Secretary of the Interior's Standards.

Response I35-4

The comment states that moving the Schilling residence from its original lakefront location is a violation of the Department of the Interior's Standards. The Secretary of the Interior's Standards (Standards) are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Secretary of the Interior's Guidelines (Guidelines), which are separate from the Standards, offer general design and technical recommendations to assist in applying the Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historic property (NPS 2020b). There are Standards and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction, depending on which treatment is appropriate for the historic building. The ten Standards for Rehabilitation, as listed

on page 3.4-3 of Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," in the Draft EIR, do not directly speak to relocation or setting.

While the Guidelines for Rehabilitation do recommend against relocation of a historic building, the Guidelines are advisory, not regulatory (NPS 2020b). As described on page 3.4-15 of the Draft EIR, while the axial and spatial relationship of the building to the frontage on Rubicon Bay is one of the many character defining features of the Schilling residence, consultation with the State Historic Preservation Office (SHPO) resulted in the conclusion that moving the historic building would not result in a significant impact to its historical significance, provided the Schilling Lodge retains the original building orientation when reconstructed.

Response I35-5

The comment summarizes the need for locating the Schilling Lodge at a higher elevation, and notes that there is a 76-foot elevation difference between the proposed Project site and the Alternative A site. The comment suggests that because of climate change, relocating the lodge to an elevation of 7,500-8,000 feet would allow for longer term usage. Although it is true that under future climate change scenarios, precipitation patterns in the Tahoe region are anticipated to change, the Project still maintains the Project objective to maximize the base elevation of the lodge site (see page 2-6 of the Draft EIR), which can be done by moving the location of the lodge to the proposed Project site (Site D). Although the elevation increase may be slight, the Draft EIR notes on page 2-5, "[c]onnections between the Existing Lodge and the trail network are at a lower elevation and are exposed, so they do not hold snow as long as other portions of the network. Melted snow serves as a barrier between the Existing Lodge and the trail network." Additionally, the Draft EIR notes on page 2-23 under Section 2.6.1, "Proposed Project (Site D – Full Project)," "[t]he location of this site would also place the lodge adjacent to beginner terrain, which would improve access for beginning skiers." Thus, the proposed site represents the maximum elevation gain feasible at the location of cross-country ski trails that are accessible near Tahoe XC and provides closer, more direct access to the portions of the trail system that are much higher and retain snow for more weeks in each year. This direct access allows skiers to avoid trail sections that often experience less snow cover due to wind conditions and sun exposure and that melt out the earliest.

Additionally, locating the lodge at the proposed Project site allows beginner, infrequent, and some senior skiers to avoid the hill at the start of the existing trail system, which presents as a significant obstacle to these skiers. Beginner ski lessons for all ages require flat terrain to establish gliding and striding technique, proper polling, and proper balance. Descending the hill in sometimes icy conditions for inexperienced skiers is also a safety concern.

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-6

The comment summarizes the number and type of events that could be held at the Schilling Lodge and notes that alcohol could be served at the events, which is at a location within a few hundred feet of North Tahoe High School and in a residential neighborhood. The comment asserts that the proposed Project and Alternative A should completely ban the selling, serving, and private consumption of alcohol or any controlled substances, especially if located next to academic institutions. The comment also notes the Project proposes to reclassify residential zoned lots on Polaris Road and utilize them for commercial purposes. See response to comment I10-19, which addresses concerns related to the presence of alcohol at the Schilling Lodge.

The comment is incorrect in stating that the Project would rezone residential parcels. Neither the proposed Project nor Alternative A would include rezoning. As stated on page 2-23 of the Draft EIR, "[the proposed Project site] is located in the North Tahoe High School Subdistrict and zoned for recreation in the Area Plan; the proposed Project site also has a land use designation of Recreation in the Area Plan and the TRPA Regional Plan (Placer County and TRPA 2017, TRPA 2018)." Page 2-26 of the Draft EIR states, "Like the proposed Project, the Alternative A site is also located in the North Tahoe High School Subdistrict and zoned for recreation in the Area Plan and has a land use designation of Recreation in the Area Plan and the TRPA Regional Plan."

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-7

The comment notes concerns related to the COVID-19 pandemic and suggests that commercial venture predicated on gatherings and high-density human interactions should be re-evaluated. The comment's opinion to re-evaluate such commercial endeavors is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-8

The comment states it is not clear why the Project is not trying to share parking with North Lake Tahoe High School, which would maintain compliance with the Area Plan requirements for shared parking. The "Parking" section on page 2-11 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR states:

the Project applicant is in the process of pursuing a shared-parking agreement with the Tahoe Truckee Unified School District to allow for shared parking during high-use events. Importantly, use of parking at the school by TCCSEA (particularly for events such as the Great Ski Race or the Great Trail Race) would occur outside of school hours. For North Tahoe High School and North Tahoe Middle School, shared parking could be used by spectators and buses in the Schilling Lodge parking lot during school-sponsored sporting events.

Thus, the Project is seeking to establish a shared parking agreement with the school; however, the shared parking would only occur outside of school hours for high-use events hosted out of the Schilling Lodge. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-9

The comment cites the Project objective, "Construct a new lodge that minimizes effects on the neighborhood." The comment states the Project along with consolidating the North Lake Tahoe Middle School and North Lake Tahoe High School do not minimize effects on the neighborhood. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-10

The comment refers to Impact 3.3-2, "Tree Removal," and compares the number of trees that would be removed at the Polaris site to the number of trees that would be removed at the current site. As analyzed under Impact 3.3-2 on pages 3.3-17 through 3.3-20 of the Draft EIR, the removal of trees by both the proposed Project and Alternative A would result in a potentially significant impact. Additionally, both the proposed Project and Alternative A would be required to implement Mitigation Measure 3.3-2, which would minimize or avoid tree removal impacts through the design and permitting process and reduce the impact to a less-than-significant level. This comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-11

The comment states that it is impossible for Polaris Road to support the construction and associated lane closures and detours detailed in the Draft EIR.

Impact 3.5-5 starting on page 3.5-28 of the Draft EIR addresses potential construction-related traffic impacts resulting from implementation of the Project and includes Mitigation Measure 3.5-5, which requires the applicant to prepare and implement a temporary traffic control plan during construction activities. Additionally, Impact 3.5-5 starting on page 3.5-28 describes that the duration of construction, number of trucks, truck routing, number of employees, truck idling, lane closures, and a variety of other construction-related activities are unknown at this time. Therefore, it is not known whether the Project would require lane closures and detours and the comment does not provide any specific evidence that Polaris Road would not be able to accommodate construction-related traffic effects with the implementation of Mitigation Measure 3.5-5. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-12

The comment states that construction noise at the Polaris site would impact students at local schools and local households, and that construction noise at the current site would impact only local households. However, the comment does not provide any evidence that the noise impact analysis presented in the Draft EIR is inadequate. Page 3.8-10 in Section 3.8, "Noise," describes all existing nearby sensitive receptors that were evaluated, and construction noise was estimated at these receptors. Considering local standards and typical construction activities, it was determined that construction noise would not result in significant impacts at any nearby receptor. No further analysis is required.

Response I35-13

The comment states that construction would result in damage to homes at the Polaris site and asks what the indemnification plan is. Impact 3.8-2 in Section 3.8, "Noise," of the Draft EIR evaluated the potential for construction vibration to result in human disturbance as well as damage to existing structures. As discussed on pages 3.8-16 and 3.8-17 of the Draft EIR, anticipated construction activities would not be located within distances where vibration has the potential to result in building damage. Therefore, impacts to existing structures were deemed less than significant. The comment does not provide any evidence that the vibration impact analysis presented in the Draft EIR is inadequate; therefore, no further analysis is required.

Response I35-14

The comment states that nearby neighborhoods are not in favor of late-night events. The comment expresses opposition to the proposed Project and Alternative A. It does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-15

The comment, related to parking, states that reuse of the current site would result in 30 percent less TRPA coverage and would be far more environmentally friendly. Additionally, the comment states that Site D could be implemented with no driveway or dedicated parking and just reuse shared parking with North Lake Tahoe High School, which would be a smart alternative and be compliant with Policy T-P-13 of the Area Plan, which states that Placer County shall encourage shared-parking facilities to more efficiently utilize parking lots.

The amount of proposed land coverage, including asphalt and total coverage, for the proposed Project is included in Table 3.9-4 on page 3.9-13 in Section 3.9, "Geology, Soils, Land Capability, and Coverage," of the Draft EIR and for Alternative A is included in Table 3.9-5 on page 3.9-14. Total coverage for Alternative A (67,619 square feet (sq. ft.)) would be approximately 17 percent less than the proposed Project coverage (81,593 sq. ft.). The amount of asphalt area required for Alternative A (49,446 sq. ft.) would be approximately 20 percent of the amount of asphalt required for the proposed Project (61,379 sq. ft.). Section 4.8.2, "Impacts Related to Tree Removal, Coverage, Utilities, and Construction," in Chapter 4, "Alternatives," of the Draft EIR provides a summary comparison of impacts related to coverage between the proposed Project and Project alternatives. Although the proposed Project would result in a greater amount of coverage than Alternative A, the amount of new coverage for the proposed Project and all alternatives is allowed and would comply with TRPA Code and other applicable regulations. The alternatives analysis and determination of the environmentally superior alternative is based on the whole of the proposed Project and alternatives, not one factor. See response to comment I11-2, which addresses concerns about the environmentally superior alternative.

The Project includes a proposal to coordinate with the high school to establish a shared-parking agreement that would allow for shared parking during high-use events outside of school hours. For North Tahoe High School and North Tahoe Middle School, shared parking could be used by spectators and buses in the Schilling Lodge parking lot during school-sponsored sporting events. Shared parking between Tahoe XC and the schools would not likely be feasible during school hours.

The comment provides no evidence as to why reuse of the Existing Lodge site would be more environmentally friendly than the proposed Project. Additionally, the remainder of the comment proposes a change to the Project and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I35-16

The comment notes the proposed Project would result in 81,539 sq. ft. of coverage, and the current site would result in 67,619 sq. ft. of coverage, noting also that Site A would result in a smaller increase in coverage over existing conditions than the proposed Project at Site D. The Draft EIR analyzes the potential impacts related to coverage under Impact 3.9-3 on pages 3.9-13 through 3.9-14 in Section 3.9, "Geology, Soils, Land Capability, and Coverage." Because the proposed Project and Alternative A would comply with TRPA land coverage regulation, they would each have a less-than-significant impact relative to land coverage. This comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-17

The comment states that Polaris Road is already dangerously fast, highly trafficked, and has a higher number of pedestrians and students and bikers on it than Village Road. The comment concludes that the proposed Project threatens the lives of students and residents due to the high speeds and lack of pedestrian facilities on Polaris Road.

As detailed on page 3.5-1 of the Draft EIR, the Transportation Analysis in Appendix D includes a more comprehensive discussion of the transportation setting in the Project area including historical crash data, driveway spacing, and results of speed surveys. Please refer to Table 18 in Appendix D for speed survey results in the Highlands Community. Additionally, a summary of the results of the speed survey conducted along Polaris Road is shown on page 3.5-10 of the Draft EIR. Please see Master Response 1: Transportation Safety. Finally, the comment does not provide any evidence as to why the Project would threaten the lives of students by generating additional traffic along Polaris Road.

Response I35-18

The comment states that Site D would generate 27 percent more trips than Site A. The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-19

The comment states that Polaris Road currently has 74.9 percent more traffic on a weekly basis than Village Road (Site A). The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-20

The comment states that the proposed plan results in a significant imbalance in traffic load on Polaris Road as compared to Village Road, with Polaris growing from 74.9 percent more traffic under existing conditions to 351 percent more traffic than Village Road with implementation of the proposed Project. Additionally, the comment states it is exceedingly likely that peak days will result in more than 2,500 daily trips on Polaris Road which is the maximum sustainable for a residential street per guidelines.

Impact 3.5-2, starting on page 3.5-21 of the Draft EIR analyzes in detail whether the Project would result in traffic volumes on a residential roadway exceeding 2,500 vehicles per day. The analysis concluded that Project-related traffic would not cause traffic volumes on residential roadways to exceed Placer County's 2,500 vehicles per day standard for residential roadways and this impact would be less than significant. Additionally, the comment does not provide any evidence to support the claim that the proposed Project would result in more than 2,500 daily trips on Polaris Road. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-21

The comment states that the proposed driveway does not meet the engineering standards for minimum sight distance for stopping. The comment raises a concern regarding wet/snowy/icy road conditions on peak days for cross-country skiing. In addition, the comment states that Polaris Road already experiences higher than normal traffic volumes for a residential street and the speeds on it were clocked at up to 42 mph during a one-day study and police reports indicate that speeds greater than 50 mph have been commonplace.

As discussed on page 3.5-23 in Section 3.5, "Transportation," of the Draft EIR, although the proposed Project driveway location does not meet the corner sight distance standards, it does meet the minimum stopping sight distance value of 200 feet for the measured 85th percentile speed (i.e., 30 mph). Additionally, although not stated in the Transportation Impact Analysis, the minimum stopping sight distance value would be met even with a 35 mph design speed. See Master Response 1: Transportation Safety for details related to the portion of the comment addressing winter conditions, minimum stopping sight distance, speed, and traffic volumes. It should be noted that "Unsafe speed" was not recorded as a factor in any of the three crashes reported during the 10-year period along Polaris Road. Additionally, the comment provides no evidence to support the claims related to specific speeds along Polaris Road. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-22

The comment notes that alternative sites to the proposed Project were removed from consideration because it would be located on land zoned and designated residential and would not be consistent with the land use designation. The comment asserts the proposed Project also requires a commercial driveway be placed on residentially zoned and designated land. The comment is correct that the land use designation was one of the factors considered in dismissing two of the six alternatives considered and not evaluated further: the Site B – Site at the End of Highlands Drive alternative and the Site C – Site at the End of Cedarwood Drive (see pages 4-4 and 4-5 in Chapter 4, "Alternatives," in the Draft EIR).

The two parcels, 093-600-001 and -002, owned by TCPUD that are located adjacent to the parcel that would contain the proposed Project driveway are designated and zoned for residential use. Figure 2-5, "Schilling Lodge Site Plan," is a preliminary design of the proposed Project that shows a narrow portion of the driveway could be located on the adjacent parcel; however, these drawings are preliminary and final design would locate the driveway within APN 093-160-064, which is designated for recreation use. Thus, the comment is incorrect that any portion of the proposed Project site is designated and zoned for residential use. See response to comment I35-6, which addresses the land use and zoning designation on the proposed Project site and Alternative A site. As discussed therein, the Project site is zoned as Recreation and the Project is consistent with that designation; thus, the Project is not considered a Commercial use.

Response I35-23

The comment expresses support for the No Project Alternative. The comment asks TCPUD to cancel the Project and the owner of the property that originally contained the Schilling residence return the building to the original location. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-24

The comment states the No Project Alternative is the environmentally preferred alternative. The comment is true; however, as stated on page 4-20 under Section 4.8, "Environmentally Superior Alternative," in Chapter 4, "Alternatives," in the Draft EIR, "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 discussed on page 4-22, the proposed Project was determined to be the environmentally superior alternative. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-25

The comment asserts Alternative A is the favorable choice based on comparison of the impacts from Alternative A and the proposed Project. The comment states it is hard to imagine a 76-foot elevation increase and slightly flatter starting area is worth some of the impacts that would occur from implementation of the proposed Project. The comment requests that if Site D is chosen, the Project should comply with the residential zoning designation and shared parking policy of the Area Plan. The comment expresses support for Alternative A over the proposed Project.

The comment is inaccurate in asserting that the proposed Project site is zoned residential. See response to comment I35-6, which addresses the zoning and land use designation of the proposed Project site. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Douglas Gourlay](#)
To: [Terri Viehmann](#); [Dan Wilkins](#); [Judy Friedman](#); [John Pang](#); [Scott Zumwalt](#); [Gail Scoville](#); [Kim Boyd](#); [Matt Homolka](#); [Sean Barclay](#)
Subject: Re: Written Comments on TXC DEIR Project for 17 July TCPUD Board Meeting
Date: Friday, July 17, 2020 9:51:46 AM

**Letter
I36**

Based on the last, rather erudite, question asked I'd like to ask for a statement from all TCPUD board members and TXC Board Members that verifies there are no conflicts of interest. Specifically, each board member should disclose if they:

- Live in proximity to the transit corridors for Site A or Site D
- Have any commercial interest - salary, investment, contracting, sub-contracting or any financial benefit from them or a household member that would stem from this project
- Have any commercial interest in the property development that replaced the Schilling Lodge or in the removal, maintenance, storage, rehabilitation of the Schilling Lodge

I36-1

A clear statement from each board member from TXC and TCPUD would go a long way in helping the residents of The Highlands know that this decision is safely in the hands of non-conflicted individuals and that there is no violation of the public trust or self-dealing.

On Fri, Jul 17, 2020 at 12:10 AM Douglas Gourlay <douglas.gourlay@gmail.com> wrote:

To: Tahoe City Public Utilities District Board of Directors
 bcc: Counsel and other Highlands Homeowners

The attached document contains my comments and analysis of the proposed TXC lodge expansion. Please read this document at the board meeting for the TCPUD board. Alternatively, I am available to present this in person if that option is available.

I36-2

Douglas Gourlay

Letter I36 Douglas Gourlay July 17, 2020

Response I36-1

The comment requests a statement from TCPUD Board members and Tahoe XC Board members that they have no conflicts of interest and should disclose if they live in proximity to transit corridors for Site A or Site D or have any commercial interest that would benefit from the Project. The comment would like to understand that the decisions made for the Project are not violating public trust. Such conflicts of interest described in the comment are not topics that require analysis in the EIR under CEQA; thus, no further response is required. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I36-2

The comment notes the document attached to this comment letter contains comments on the Project and would like them read at the July 17 public meeting. The attachment is letter I35; thus, see responses to comments I35-1 through I35-25. This comment letter was not read aloud during the public meeting because the author himself provided oral comments (see response to comments PM1-4 through PM1-9).

From: [David Gleske](#)
To: [Kim Boyd](#)
Subject: TXC draft EIR
Date: Friday, July 17, 2020 10:43:45 AM

**Letter
I37**

As members of our North Shore community since 1972, my wife and I support the reconstruction of the Schilling Lodge at the TXC. This recreation facility has been a great asset to our community for many years and the new Lodge would be a great improvement.
 Thanks for considering our comments.

Kay and Dave Gleske
 Agate Bay Full Time Residents

I37-1

Sent from my iPhone

Letter I37 Kay and Dave Gleske

July 17, 2020

Response I37-1

The comment includes background information about the letter's author and expresses support for the proposed Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Matt Homolka](#)
To: [Kim Boyd](#)
Subject: FW: Questions and comments regarding proposed TXC project DEIR
Date: Friday, July 17, 2020 11:22:21 AM

Letter I38

Matt Homolka, P.E.
Assistant General Manager/District Engineer
Tahoe City Public Utility District
530.580.6042 Direct
530.583.3796 Main Office ext. 342
www.tcpud.org

-----Original Message-----

From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
Sent: Thursday, July 16, 2020 4:48 PM
To: Matt Homolka <mhomolka@tcpud.org>
Subject: Re: Questions and comments regarding proposed TXC project DEIR

Do any members of the Board live in the Highlands?

I I38-1

Sent from my iPhone

> On Jul 16, 2020, at 3:45 PM, Matt Homolka <mhomolka@tcpud.org> wrote:

>

> Carol,

>

> Thank you for your comments. We have discussed your request with the Board president. Given the difficulties of our current situation, she has agreed to allow a staff member to read your email during the public comment portion of the subject item. A few things to note:

>

> * Your email will be read verbatim. However, emphasis added by formatting or attachments will not be provided.

> * Oral public comments are limited to 3 minutes. Staff will cease reading your comments when that limit is reached.

> * Oral public comments are limited to 1 per person. This will be your one oral public comment. Please do not attempt to augment them during the meeting.

> * Regardless, the entirety of your emailed comments will be treated as a written comment on the draft EIR for the Tahoe XC Lodge Replacement and Expansion Project and will be responded to completely in the Final EIR.

>

> Sincerely,

>

> Matt Homolka, P.E.

> Assistant General Manager/District Engineer Tahoe City Public Utility

> District

> 530.580.6042 Direct

> 530.583.3796 Main Office ext. 342

> www.tcpud.org

>

I38-2

>
>
> -----Original Message-----
> From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
> Sent: Tuesday, July 14, 2020 10:33 PM
> To: Terri Viehmann <tviehmann@tcpud.org>; Dan Wilkins
> <d.wilkins@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; John Pang
> <jpang@tcpud.org>; scottzumwalt@gmail.com; Gail Scoville
> <gscoville@tcpud.org>
> Cc: Sean Barclay <sbarclay@tcpud.org>; kboyd@tcpud.com; Matt Homolka
> <mhomolka@tcpud.org>
> Subject: Questions and comments regarding proposed TXC project DEIR
>
> Dear Board Members,
>
> I would appreciate it if the following questions and comments are read aloud and discussed during the upcoming Board meeting.
>
> 1. Does the DEIR consider the dangerous winter traffic conditions on Old Mill Road? We have provided comments and photos of winter accidents to the Board in January. Some photos are included again. Does the Board consider increasing winter traffic on Old Mill in the interests of public safety? Of either residents or visitors to the TXC? How can Appendix D conclude that the proposed site D wouldn't result in a significant traffic safety impact?
>
> 2. Is there a construction budget and operating budget for this project? What are the financial consequences of low snow years for TXC?
> What are the consequences of significant operating deficits?
>
> 3. What regulatory approvals are required for the construction and coverage of a large building and significant paving of meadow and forest and tree removal? Have they been sought?
>
> Thank you,
>
> Carol Pollock
> 405 Old Mill Road
>
>
>
>

Letter I38 Carol Pollock

July 17, 2020

Response I38-1

The comment asks if any of the Board members live in the Highlands neighborhood. The comment does not raise environmental issues or concerns that require analysis in the EIR under CEQA; thus, no further response is required. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I38-2

The comment includes correspondence related to providing oral comments at the July 17 public meeting. The comment includes the same comments included in letter I32. See responses to comments I32-1 through I32-5.

From: [bonnie dodge](#)
To: [Kim Boyd](#); [Craig Dodge](#); [huffmtrtry@aol.com](#); [Becca Dodge](#)
Subject: Schilling Lodge Draft EIR/Public comments
Date: Friday, July 17, 2020 1:12:37 PM

Letter 139

Dear Kim,

I regret that I was unable to draft this letter before your meeting this morning. It has been an interesting and complicated spring/summer because of the Covid 19 crisis still affecting all of us. First major comment...what an incredible amount of work has been done to address our community's need for an improved and enlarged cross country ski lodge. I am impressed by the level and depth of analysis put into each and every alternative. Thank you.

I39-1

I am a homeowner on Polaris Drive, just at the dip before reaching the High School. This is the location the highest speed attained by most vehicles going to and coming from the High School. I'd like to say that it's mostly kids doing the speeding, but it's not. I have personally been nearly hit on my bicycle several times by motorists simply not paying attention, and have witnessed other close calls involving both pedestrians (usually students walking to and from school) and other cyclists. My own dog was hit by a student returning from a basketball game in January and I have seen 2 other animals hit on Polaris Road. Traffic on Polaris is a much bigger issue than on both Village and Country Club because of the location of the High School/Middle School and the fact that all students/faculty MUST use Polaris to access the schools. My gut feeling is that no amount of attempted mitigation is going to be enough. Traffic is going to increase and the results will be greater numbers of accidents involving students, residents and residents' furry friends. Likewise, when you add a venue for major events, you will also increase traffic flow to an already congested area. Believe me, we feel it whenever there is a ballet, a concert, a game of any sort held at the High School. Now you are proposing the addition of another venue with added events, all of which will add to the already heavy traffic. In addition, you will be adding non-resident drivers, often in a hurry to "have fun" and not used to driving residential streets in winter conditions.

I39-2

Then there is the issue of the safety of the students and the recreational participants in the event of an emergency...you name it, fire, flood, chemical spill, whatever. Having only one 2-lane residential road to evacuate will be a nightmare that I don't want to live. My guess is that not too far down the road, if this project at the site on Polaris goes through, there will be a community demand for another road exiting the High School.

I39-3

That road will either have to go through more of our beloved forest in our backyard, or connect down through Burton Creek...more trees downed, more negative environmental impact.

It's also clear in the EIR that the environmental impacts are most potentially severe at the Polaris site. It makes much more sense to expand the existing site which would allow for the least disruption of mama nature; fewer downed trees, less earth moved, fewer disturbed plant species, fewer disturbed animal species and quite frankly, fewer disturbed residents. The residents of the Highlands are used to the traffic flow created by the Nordic Center at its current location. The added parking will definitely improve the street parking situation for residents on Country Club and Highlands Drive. The traffic situation should not change radically. Because you have determined that this site would also meet your stated goals, it seems like a no-brainer to improve what you have and decrease the odds of all the stated potential environmental impacts.

I39-4

When it comes to the mitigation measures, I am impressed by the stated measures to which you will try to hold contractors and users accountable. However, my life's experience has

I39-5

taught me that contractors will often cut corners in hopes that they can increase profit. It's only IF they get caught that there are consequences and by then the damage is DONE. They will pay their fines and move on. Likewise, users will stick to their habits. In other words, people who are inclined to use public transportation or carpools will, and others (because they prefer convenience!!) will not.

I39-5
cont.

The noise issue is also significant. Even if they stick to 8am to 6:30pm, (again, that's not my experience) we will have 4 years of noise pollution at a high level. Again, if the work is done at the existing site, at least it will be much less significant than uprooting roughly double the untouched forest.

Then there is the noise created by just having a recreational facility right next to 2 schools. We already hear football games, baseball, lacrosse...you name it. A new recreational facility in essentially the same spot is going to significantly increase our exposure to noise created by major events. It seems wise to spread that kind of impact around, rather than focusing it all in one spot.

I39-6

Finally, I am a cross country skier. I know that the existing facility is too small and does not afford enough parking. The Schilling Lodge will make an attractive and much more efficient facility for both locals and visitors. Change is necessary.

Still, I do not believe that moving the current location of the Nordic Center is at all justified. Please try to implement change without increasing the danger to students, faculty, residents and recreational visitors. Modernizing, improving and increasing the size of the existing facility will protect so much more of our existing wildlife, plant species and forest. I implore you to abandon the Polaris site in favor of its current location on Country Club.

I39-7

Thank you for your time and consideration,

Bonnie M Dodge
3045 Polaris Rd.
530-363-0589

Letter I39 Bonnie Dodge

July 17, 2020

Response I39-1

The comment provides introductory comments to the letter. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Response I39-2

The commenter notes that they are a homeowner along Polaris Road and that speeding along this road is an issue and that they have nearly been hit on their bicycle several times by motorists simply not paying attention, and have witnessed other close calls involving both pedestrians and other cyclists. The commenter also notes that their dog was hit by a student returning from a basketball game in January and that they have seen two other animals hit on Polaris Road. The comment states that traffic on Polaris Road is a much bigger issue than on both Village Road and Country Club Drive because of the location of the High School/Middle School and the fact that all students/faculty must use Polaris Road to access the schools, and that no amount of attempted mitigation is going to be enough. The comment goes on to state that traffic is going to increase, and the results will be greater numbers of accidents involving students, residents, and residents' animals. Additionally, the comment states that the addition of a venue for major events will increase traffic in an already congested area and the non-resident drivers accessing the proposed Project will be in a hurry to "have fun" and not used to driving residential streets in winter conditions.

In relation to speeding and pedestrian safety, please see Master Response 1: Transportation Safety. The comment does not provide any data or evidence to contradict the conclusions of the transportation analysis related to roadway safety in the Draft EIR or provide specific evidence that the traffic safety analysis in the Draft EIR is inadequate, inaccurate, or incomplete. Therefore, no further response is necessary.

Regarding the concerns noted in the comment related to congestion and traffic associated with implementation of the proposed Project, Impact 3.5-1 and Impact 3.5-2 in Section 3.5, "Transportation," of the Draft EIR analyze the potential effects of Project-generated traffic within the study area. Additionally, the comment provides no evidence to support the claim that Polaris Road is currently congested. Finally, the comment provides no evidence that the drivers accessing the proposed Project would be predisposed to speed and would not be used to driving in winter conditions. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-3

The comment expresses concern related to the safety of the students and recreational participants in the event of an emergency (e.g., fire, flood, chemical spill, etc.) and having only a two-lane road for access. The comment also believes that in the future there will be a desire for an additional road exiting the high school, which could have environmental effects. See responses to comments A3-2, I10-6, and I10-7, which address concerns related to the use of hazardous materials as part of the Project. See response to comments I10-6 and I10-8, which address concerns related to wildfire risk. See response to comment I10-7, which addresses concerns related to emergency evacuation. As stated on page 3.10-1 in Section 3.10, "Hydrology and Water Quality," in the Draft EIR, "[t]he proposed Project site and Alternative A site do not contain stream or water bodies and are not in the 100-year flood hazard zone for any stream or water body." The comment's thoughts related to desire for a future road are not related to the Project. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-4

The comment expresses support for Alternative A and notes the EIR identifies the environmental impacts at the Polaris site are more severe than those from Alternative A. The comment asserts some of the benefits of Alternative A compared to the proposed Project would include fewer trees removed, less earth moved, fewer disturbed plant species, and no radical change to traffic. As discussed in Section 4.8, "Environmentally Superior Alternative," beginning on page 4-20 of the Draft EIR, the proposed Project is the environmentally superior alternative because it

would have fewer potentially significant impacts that would be reduced to a less-than-significant level with implementation of mitigation compared to Alternative A. The Site A alternatives would result in potential impacts to water supply that do not apply to the Site D alternatives. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-5

The comment expresses skepticism that mitigation measures required for the Project would be implemented. CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies “to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment.” An MMRP is required for the Project because the EIR identifies potential significant adverse impacts related to Project implementation, and mitigation measures have been identified to reduce those impacts. The MMRP is available under separate cover from this Final EIR. TCPUD is required to monitor completion of the mitigation measures identified for the Project and, where necessary, TCPUD, the Project applicant, or Project contractor would coordinate with other public agencies (e.g., Placer County, TRPA, Lahontan RWQCB) to demonstrate that mitigation requirements have been met to obtain and fulfill all necessary permit and approval requirements. Furthermore, this comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-6

The comment states that a new recreational facility is going to significantly increase noise exposure and that these impacts should be spread around rather than focusing is all in one spot. Impact 3.8-3 in Section 3.8, “Noise,” of the Draft EIR discusses the nature of potential noise-generating activities at the proposed Schilling Lodge and associated noise levels, based on noise measurements conducted for similar types of events. Further, pages 3.8-17 and 3.8-18 of the Draft EIR evaluated these potential noise sources in comparison to adopted TRPA noise standards, and based on this analysis it was determined that future event noise would not exceed applicable noise standards for the area. It should be further noted, as discussed on page 3.8-2 of the Draft EIR, that noise sources that are of equal noise levels occurring in the same location, when combined, result in a 3-db noise increase, which is generally perceptible to humans. However, the Schilling Lodge under the proposed Project would be located approximately 140 feet from the existing sports track, and therefore, would not combine with noise from existing recreational facilities to result in an audible increase in noise.

Response I39-7

The comment expresses support for an expansion of the Existing Lodge at the current location. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Linda May](#)
To: [Kim Boyd](#)
Subject: TXCDraft EIR
Date: Friday, July 17, 2020 4:44:08 PM

Letter
I40

I want to add my support to the project for the Tahoe Cross country lodge replacement project. I live in the Highlands near the current cross country center. There is a little increased traffic, but nothing the is a nuisance. I actually enjoy listening to the occasional live music from my back yare.

I40-1

Linda May
3085 Highlands Ct.

Letter I40 Linda May
July 17, 2020

Response I40-1

The comment includes background information about the letter's author and expresses support for the proposed Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

July 18, 2020

Subject: Tahoe XC DRAFT EIR

Letter
I41

Dear TCPUD Board Members,

Executive Summary. Draft reviews are typically used to identify areas requiring more attention and the following *Reviews Comments* do that; while *Requested Changes* and the *Recommended Approach* would make the project safer, less controversial and less likely to encounter costly litigation, and more consistent with both the Donor’s documented intentions and the Schilling family’s wishes, worthy goals that all parties ought to support.

Background. The Applicant’s www.theschillinglodge.com Web site states that when Mr. John Mozart donated the former Old Tahoe residence, he “made clear his intentions to honor the historical significance of the property,” and also that the Schilling family members did not want their old home “remodeled beyond recognition,” but rather used for enjoyment “by the larger Tahoe community.”

When the project was first presented to community members, the vast majority favored the Applicant’s proposal to replace the current 2,485 sq. ft. *Highlands Community Center* with the 4,607 sq. ft. historic Schilling lodge, plus modestly enlarged parking to accommodate the average number of vehicles on a typical winter day; but this was not one of the Alternatives considered in the DEIR.

I41-1

Since then, the project has: more than doubled in size, added a much larger parking area, a driveway, and a basement; proposed additional sites, included extensive interior alterations and additions designed for use by the applicant’s own members and commercial activities, and become a lot more controversial.

Controversial projects often exhibit **Red Flags**, and the most common and most frequently fatal ones include: impatience, neglecting to correct chronic problems, allowing ambitions to override common sense, and failing to change course and speed in time to avoid disaster. One famous example is the *Titanic* catastrophe, which could have been avoided if decision-makers had not ignored warnings.

Recommended Approach. The Proposed Project is currently at a key decision point, and can learn from such mistakes or risk repeating them. If the following *Comments* and *Requested Changes* are not properly addressed now, they will likely become even more problematic. To prevent this, we strongly recommend that the TCPUD Board:

SLOW DOWN

The DEIR contains 831 pages. Its Notice of Availability was issued on June 5th, and requests public review comments be submitted on or before 24 July. This is insufficient for most people to: access, properly review, and submit comments on

I41-2

such a document; and CEQA guidance lets Lead Agencies “use their discretion to extend such time periods to allow for additional public review and comment.” **Please extend the public review and discussion period by at least 30 days to prevent further credibility damage to this already controversial project.**

I41-2
cont.

CORRECT CHRONIC PROBLEMS

The DEIR inherited some confusing, incorrect, and/or misleading information that members of the community had asked to be fixed in earlier documents; and if not corrected now will continue to confuse readers and damage credibility.

1. Project Name (Multiple Occurrences) - This project has changed names at least twice, and the current one is both too long and misleading, because:
 - The actual structure out of which Tahoe Cross-Country (TXC) currently operates as a tenant activity is the *Highlands Community Center*, and
 - That current structure is neither replaced nor expanded as part of the Proposed Project.

Please consider a shorter and more appropriate Project Name.
2. Executive Summary - There is no such building as the “Highlands Park and Community Center.” **Please correct this to read “Highlands Community Center.”**
3. Introduction (Section 1) - There is no such thing as the “Highlands Park trail system.” **Please correct to use proper terms for trails in the Highlands.**
4. Project Description (Section 2.1) - **Please correct “Highlands Park and Community Center,” to read “Highlands Community Center.”**
5. Project Description (Section 2.3) - **Please correct “Highlands Park and Community Center” to read “Highlands Community Center” here also.**
6. Archeological & Historical (Impact 3.4-1) - “Highlands Park and Community Center” is *misleading*. **Please correct to read, “Highlands Community Center.”**
7. Archeological & Historical (Impact 3.4-1) - “Highlands Park Neighborhood” is *also invalid here*. **Please correct it to read, “Highlands neighborhood.”**
8. Noise (Impact 3.8-3) - To avoid additional confusion, if the term “Schilling Lodge” is used, **please also clarify:** (a) the difference between it and the “Schilling residence,” and (b) to which structural configuration it applies.
9. Hydrology (Impact 3.10-3) - **Please refer to Item 8 regarding use of the term “Shilling Lodge.”**

I41-3

- 10. Utilities (Impact 3.11-1) - Please refer to Item 8 regarding use of the term “Shilling Lodge.”
- 11. Other CEQA (Multiple Occurrences) - Please refer to Item 8 regarding use of the term “Shilling Lodge.”
- 12. Appendix B (Multiple Occurrences) - Please refer to Item 8 regarding use of the term “Shilling Lodge.”
- 13. Appendix D (Transportation Analysis) - The Project Description segment contains yet another *incorrect and confusing name* (i.e., the TXC Project). **Please ensure all these inconsistencies are resolved in the next EIR.**

I41-3
cont.

CHANGE COURSE

Without a significant course change at this point, the proposed project faces the real possibility of encountering major obstacles and/or failure. It exhibits several of the **Red Flags** mentioned previously, and the *Requested Changes (in bold)* would strengthen the EIR, and put the project onto a safer, less controversial, and more beneficial course for a *much larger segment* of our community:

I41-4

- 14. Executive Summary - There are public complaints that use of nebulous terms like “repurposes,” “reconstructed,” or “adaptive reuse” *attempt to disguise* the true scope of the massive internal modifications and external additions to the original historic structure. **Please replace them with less ambiguous and more appropriate terms, e.g., modified, expanded.**

I41-5

- 15. Introduction (Section 1) - Because the proposed internal modifications and additions to the original structure are specifically designed to accommodate the applicant’s own members and commercial activities, applying terms like “community uses” and “community needs” *are inappropriate and misleading*. **Please re-word this section to accurately describe that the proposed facility would be primarily designed for the applicant’s usage.**

I41-6

- 16. Project Description (Section 2.1) - Extensive internal changes and external additions to the original historic structure make repeated usage of terms like “adaptive reuse” and “preserve” seem *misleading and disingenuous*. **Please use more appropriate and less ambiguous terms, e.g. alter, add-to.**

I41-7

- 17. Project Description (Section 2.4) - **Please explain** how the proposed project would “preserve the financial responsibility and transparency of TCPUD’s property tax funds,” and how a facility designed around the applicant’s own membership/commercial functions qualifies as being for “community use”?

I41-8

- 18. Project Description (Section 2.5) - The last sentence implies this could be a privately-owned facility on publicly-owned land. **If that is the case, it will likely become a “show-stopper” for the proposed project.**

I41-9

- 19. Project Description (Section 2.5.1) - Using terms like “adaptive reuse” seem misleading and disingenuous for reasons described above, massive internal changes and additions *don’t reasonably* qualify as “retaining the character defining features” of the original historic structure; and using terms like “public enjoyment” and “public area” *are inconsistent* with the fact that the proposed facility would be designed specifically for the applicant’s own use/operations. **Please re-word these sentences to more accurately describe the proposed project.**

I41-10
- 20. Project Description (Section 2.5.3) - **Please describe if/how** the applicant would reimburse Placer County and the TCPUD for any damages done to roads and/or infrastructure during construction of the Proposed Project.

I41-11
- 21. Project Description (Section 2.6.1) - There are concerns that the repeated usage of ambiguous and misleading terms like “adaptively reuses” for this massively modified structure *tries to hide* the actual scope of the project. **Please re-word to more accurately describe the proposed changes.**

I41-12
- 22. Project Description (Section 2.6.1) - There are also concerns that the first sentence in the paragraph following Table 2-5 implies the TCCSEA would have primary control over event bookings at both the new facility and the *Highlands Community Center*, and **this can be a another show-stopper.**

I41-13
- The strength of an EIR is driven by the validity of its *assertions and assumptions*, and the following items discuss specific areas of concern with ones in the DEIR:
- 23. Environmental Impacts and Mitigation Measures (Section 3.2.1) - Assertion that a 10,000+ sq. ft. structure, a massive parking area, and the associated operations would have a “less than significant impact” upon the aesthetic qualities in The Highlands residential neighborhood *is not realistic.*

I41-14
- 24. Environmental Impacts and Mitigation Measures (Section 3.2.3) - Assertions that cited references could mitigate the potential hazards created by locating hundreds of gallons of flammable fuels and other hazardous materials next to several schools with just one emergency response/evacuation route to a “less than significant level” *are not logical*, and CEQA *warns against* allowing hazardous materials within 1/4 mile of any school, let alone two. **Please delete such assertions.**

I41-15
- 25. Environmental Impacts and Mitigation Measures (Section 3.2.7) - Assertion that the impact of up to 100 more vehicles a day on a busy residential street and the only emergency response and evacuation route for several schools upon emergency response times would be “less than significant” *is illogical.* **Please delete that assertion.**

I41-16

- 26. Environmental Impacts and Mitigation Measures (Section 3.2.9) - Assertions that: (a) the new facility would not attract more visitors, (b) most would be locals, and (c) the increased number of activities and large events would not increase wildfire risks in a “Very High Fire Severity Zone are *questionable*, and questionable assumptions *should not be used* to mitigate safety risks. **Please support these with objective data (not assumptions) or delete.**

I41-17
- 27. Biological Resources (Section 3.3) - The assertion of “no sensitive habitats or biological communities such as wetlands, streams, SEZs, etc.” *is invalid* because the Proposed Project site actually drains into a seasonal stream that runs under Polaris into a SEZ and then Tahoe; and this Section also *neglects* to address “common” species of wildlife and plants affected by the project. **Please re-word this Section to reflect both of the above facts.**

I41-18
- 28. Biological Resource (Section 3.3.1) - Due to the seasonal stream mentioned above, the Proposed Project would require both Clean Water Act and TRPA permits; plus TRPA permits for tree removal. **Please include these facts.**

I41-19
- 29. Biological Resources (Impact 3.3-2) - The statement that construction of the Proposed Project would “require the removal of approximately 183 trees” *is inconsistent* with a subsequent one that says, “Habitat for common bird and mammal species does exist on the Proposed Project site, but the Proposed Project would not substantially affect common species.” **Please resolve it.**

I41-20
- 30. Biological Resources (Impact 3.3-4) - The assertions that “the proposed project is not expected to substantially affect” important wildlife movement corridors, and that “any potential impacts would be less than significant” *are incorrect because* bear, coyotes, and smaller mammals routinely transit the project area. **Please correct these assertions to reflect these facts.**

I41-21
- 31. Archeological & Historical (Section 3.4.1) - The assertion that the proposed project would qualify as a “Rehabilitation” under the Interior Secretary’s Standards *is invalid*, because the massive interior changes, 6,000+ sq. ft. of additions including a basement clearly do not “retain the structure’s historic character.” **Please delete this assertion.**

I41-22
- 32. Archeological & Historical (Cumulative Impacts) - The assertion that the proposed project would not considerably contribute to any significant cumulative impact on a historic resource *is not logical*, because the massive internal alterations and additions would drastically and permanently change the original historic Old Tahoe structure. **Please delete this assertion.**

I41-23
- 33. Transportation (Section 3.5) - The paragraphs regarding access to bicycle trails or transit stops *are irrelevant* to public concerns about the Proposed Project; and assertions that the increased traffic wouldn’t have significant

I41-24

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| <p>effect upon the area’s emergency response and evacuation <i>aren’t logical</i>.
 Please delete the latter assertions.</p> | <p> I41-24
cont.</p> |
| <p>34. <u>Transportation (Section 3.5.1)</u> - The regulatory guidance cited here may be interesting, but <i>common sense must prevail</i> regarding the effects increased traffic associated with the Proposed Project would have upon public safety; and <i>is much more credible</i> than the payment of “Mitigation Fees.”</p> | <p> I41-25</p> |
| <p>35. <u>Transportation (Section 3.5.2)</u> - The current descriptions of both Old Mill and Polaris Roads <i>are insufficient</i> because: (a) they would become main access and egress routes for the Proposed Project, and (b) they both include steep segments that often become quite icy and much more dangerous during the winter. Please re-word these descriptions to include this information.</p> | <p> I41-26</p> |
| <p>36. <u>Transportation (Section 3.5.2)</u> - The proximity of: bicycle paths, the Dollar Creek shared-use path, striped bicycle lanes on Hwy 28, and unpaved trails <i>are irrelevant</i> to documented public concerns about the increased car and bus traffic that the Proposed Project would have on the safety of residents, neighborhood students, and gym classes that routinely use Polaris Road. Please delete irrelevant information, and focus on the latter issues.</p> | <p> I41-27</p> |
| <p>37. <u>Transportation (Section 3.5.3)</u> - The assertion that “The Schilling Lodge is not expected to increase skier visitation to the site” is: <i>unsupported by objective analysis</i> and <i>inconsistent</i> with the increased size of the Proposed Project; and the 10 percent estimate <i>is a guess at best</i> in estimating impacts traffic would have upon public safety and the environment. Please support this assertion with objective data (not assumptions) or delete it.</p> | <p> I41-28</p> |
| <p>38. <u>Transportation (Section 3.5.3)</u> - TCPUD’s correspondence files reveal that multiple residents <i>specifically requested</i> that the DEIR properly address the safety risks the increased traffic associated with the Proposed Project would have on pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris between the schools and Heather Lane. Please specifically address this in future EIR versions.</p> | <p> I41-29</p> |
| <p>39. <u>Transportation (Section 3.5.3)</u> – The bases for the current assumptions in the Trip Generation paragraphs <i>are not provided</i>, and <i>much too subjective</i>. Such questionable assumptions <i>should not serve</i> as a basis for decisions about the impacts increased traffic associated with the Proposed Project would have on public safety, the environment, or The Highlands neighborhood. Please support these with objective data (not assumptions) or delete them.</p> | <p> I41-30</p> |
| <p>40. <u>Transportation (Section 3.5.3)</u> - The Existing Vehicle Speeds paragraph states that, “the majority of speeds recorded on Polaris Road are <i>above</i> the speed limit,” and it <i>is not logical</i> to assume addition of up to 100 more visitor</p> | <p> I41-31</p> |

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| <p>vehicles a day would decrease speed. Please support this assertion with objective data (not assumptions) or delete it.</p> | <p>I41-31
cont.</p> |
| <p>41. <u>Transportation (Impact 3.5-2)</u> - Administrative guidelines may be attractive mitigation options, but whoever established the traffic volume threshold of 2,500 vehicles/day clearly wouldn't enjoy living on such a residential street, and wouldn't like their children on it either. Common sense must prevail.</p> | <p>I41-32</p> |
| <p>42. <u>Transportation (Impact 3.5-4)</u> - In view of the challenges and complications related to drastically enlarging the parking area, why not base its size upon the <i>average</i> number of spaces required on an <i>average</i> winter/summer day?</p> | <p>I41-33</p> |
| <p>43. <u>Transportation (Impact 3.5-5)</u> - This segment notes that construction of the Proposed Project could result in: lane/street closures, redirection of traffic, staging of heavy vehicles, etc. This is not reasonable for a residential neighborhood like The Highlands that contains several schools.</p> | <p>I41-34</p> |
| <p>44. <u>Transportation (Cumulative Impacts)</u> - This segment needs to address the impacts that the Proposed Project's traffic would have upon the safety of pedestrians (e.g., neighborhood students) from up to 241 residential units in the <i>Dollar Creek Crossing</i> project, who would be walking on Polaris Road.</p> | <p>I41-35</p> |
| <p>45. <u>Air Quality (Section 3.6.1)</u> - This Section indicates the project may be able to circumvent certain air quality standards with the <i>payment of Mitigation Fees</i>. Mitigation fees are not credible ways to reduce public safety risks.</p> | <p>I41-36</p> |
| <p>46. <u>Air Quality (Section 3.6.2)</u> - The third to last sentence in the Sensitive Receptors paragraph <i>only mentions</i> North Tahoe Middle and High school students; and the last sentence <i>incorrectly states</i> that "there are no other sensitive receptors within the vicinity of the proposed project." West winds are quite common, so air pollution <i>would also affect</i> sensitive residents in much of The Highlands just east of the Proposed Project. Please change these sentences to reflect the above fact regarding sensitive receptors.</p> | <p>I41-37</p> |
| <p>47. <u>Air Quality (Impact 3.6-3)</u> - Since some of the same assumptions regarding project traffic are applied here to support air quality impact assertions, the same cautions as in Item 39 above also apply. <i>Questionable assumptions</i> lead to <i>questionable decisions</i>. Please support these with objective data (not assumptions) or delete them.</p> | <p>I41-38</p> |
| <p>48. <u>Air Quality (Impact 3.6-4)</u> - The same problem(s) exist here as in Item 46.</p> | <p>I41-39</p> |
| <p>49. <u>Air Quality (Cumulative Impacts)</u> - The last two sentences in this segment pertain to the same concern mentioned in Item 45 above. Do not do this.</p> | <p>I41-39</p> |

- 50. Green House Gases (Section 3.7.1) - **Please explain how** the TRPA’s requirement that limits idling time for heavy vehicle diesel engines to five minutes would allow the construction traffic staging anticipated in Item 43.

I41-40
- 51. Green House Gases (Section 3.7.3) - **Please update** the construction timetable in the second paragraph to reflect the current project status.

I41-41
- 52. Green House Gases (Mitigation Measure 3.7-1) - **Please review the measures listed, and limit the size** of the parking area to that needed for the *average* number of vehicles on an *average* operating day.

I41-42
- 53. Noise (Impact 3.8-4) - The assumptions regarding traffic increase *are too subjective* to be used to *estimate* the additional noise level when it is very close to the maximum threshold for schools and residential areas. **Please support these with objective data (not assumptions) or delete them.**

I41-43
- 54. Geology (Section 3.9.1) - Policy S-1.7 in the TRPA paragraph **also applies** since the Proposed Project would drain into a seasonal stream as noted.

I41-44
- 55. Geology (Section 3.9.2) - **Please change the last sentence** in the Local Geology paragraph to read, “The proposed project site drains to the south and east under Polaris Road and into a SEZ and Lake Tahoe.”

I41-45
- 56. Geology (Section 3.9.2) - Because the proposed project site drains into a seasonal Stream Environmental Zone (SEZ), **please re-assess** how this fact affects its classification discussed in the Land Capability paragraph.

I41-46
- 57. Geology (Impact 3.9-2) - **Please refer to Item 8 regarding use of the term “Shilling Lodge,” and re-assess** how excavation of the basement would endanger silting of the SEZ drainage mentioned above.

I41-46
- 58. Hydrology (Section 3.10) - The assertion that “The proposed project site does not contain stream or water bodies” may be technically correct, but it does drain into a SEZ that leads into Lake Tahoe. **Please re-word this assertion to reflect the above.**

I41-47
- 59. Utilities (Section 3.11.1) – Any Assertions that “No Mitigation Measures are required for Site D” are *incorrect*. NTFPD Code and TRPA Policy prohibit any development unless adequate water is “available for domestic use and fire prevention.” The TCPUD confirmed that the current system “was created during the reconstruction of the NTHMS in 2006,” and “that NTFPD was training in the area” that week; but the most important facts are: (a) On May 28th, alert residents had to use rakes and shovels to keep a brushfire from spreading to nearby trees behind homes on Polaris, and (b) If the fire had spread on a “normal school day” that area’s only emergency response and evacuation route would have quickly become clogged up with firefighting equipment and other vehicles. **This is another show-stopper for Site D.**

I41-48

- 60. Utilities (Section 3.11.3) - In view of Item 59, *estimating water needs* for a facility that is more than twice as large and on the same supply line as two schools based on usage by the existing structure *is unreasonable*. **Please support this with objective data (not assumptions) or delete it.**

I41-49
- 61. Utilities (Mitigation Measure 3.11-1) - In view of Items 59, **please include Mitigation Measures for both the Proposed and the Reduced Projects.**

I41-50
- 62. Utilities (Cumulative Impacts) - Due to Items 59-61, **please change the last sentence** to read, “there could be significant cumulative impact upon water supply, water supply infrastructure, and fire evacuation route safety for both the Proposed Project and the Reduced Project at Site D.”

I41-51
- 63. Alternatives (Section 4.1.1) - **Please include the following Alternative** as multiple community members formally requested, that addresses the Project Objectives listed in both this section and Executive Summary and reduces or eliminates impacts in multiple areas of concern covered by this DEIR:

“1. Replace the 2,465 sq. ft. Highlands Community Center with the original 4,607 sq. ft., two story, historic Schilling Lodge; as favored by the vast majority of residents in 2014, and as consistent with both the Donor’s and the Schilling Family’s stated wishes;
2. Only allow minimal, internal, modifications required not just to meet essential needs of the Applicant; but also for larger Community enjoyment as the Donor and Family intended;
3. Make the parking area less obtrusive by limiting its additions to those needed to minimize on-street parking on an average winter day, and using the smaller 2,814 sq. ft. surface footprint of the original Schilling Lodge; and
4. Transfer its final ownership to the TCPUD to avoid problems associated with putting a privately-owned facility on publicly-owned land, and allowing it to be shared by “the larger Tahoe Community” as the Donor has stated.”

I41-52
- 64. Alternatives (Section 4.8.5) - Because of the number of inconsistent terms, questionable assertions, and unsubstantiated assumptions about Traffic, Air Quality, Noise, and Water Supply in this Draft, the conclusion stated here that “the proposed project would be the environment superior alternative” is *both inappropriate and unjustified*. **Please delete it.**

I41-53
- 65. Other CEQA (Section 5.1.3) - The assertion that “the number of attendees at the large special event would not be greater than those that occur under existing conditions” *is not substantiated*. **Please support this statement with objective data (not assumptions) or delete it.**

I41-54
- 66. Other CEQA (Section 5.4) - Due to the inconsistent terms, questionable claims, and unsubstantiated assumptions in this Draft; the last sentence stating that “the proposed project and Alternative A would not result in

I41-54

- significant and unavoidable impacts” *is both inappropriate and unjustified.*
Please delete that sentence. | I41-54
 cont.
67. Appendix B (Management Policies) - The use of phrases like “community gathering space,” “a community gathering amenity,” and “an asset for the entire community” are *misleading and inappropriate* because the proposed interior modifications and external additions are all specifically designed for use by the applicant’s members and commercial activities. **Please re-word these sentences to more appropriately describe that the proposed facility would be primarily designed for the applicant’s use.** | I41-55
68. Appendix B (Management Policies) - Item 11 says that, “the Café will not *sell* alcohol,” but it does not address if alcohol will be *allowed* on the premises next door to two schools. **Please clarify this public concern.** | I41-56
69. Appendix D (Transportation Analysis) - The Existing Roadways segment says that the western portion of Polaris Road “carries approximately 1,400 daily one-way vehicle trips on a school day.” Since most of those vehicles return on the same day, the additional traffic to/from the Proposed Project *would cause the total to exceed the 2,500 vehicles per day threshold* for residential streets described in Impact 3.5-2 and discussed in Item 41. **Please re-assess this data.** | I41-57
70. Appendix D (Transportation Analysis) - In the third bullet under the Winter Trip Generation for the Proposed New Lodge Site, **please explain why** the analysis *assumes* the “gathering event is assumed to arrive/start during the PM peak hours” versus the AM peak hour on a school day? | I41-58
71. Appendix D (Transportation Analysis) - The third bullet under the Future Cumulative Conditions segment *needs to describe* that the Dollar Creek Crossing project would likely add a significant number of neighborhood student pedestrians on Polaris Road who would be endangered by the increased traffic. **Please re-word the item to include this information.** | I41-59
72. Appendix D (Transportation Analysis) - Figure 11 reveals that the vast majority of the time, on-site parking can be accommodated with a much smaller area than in the Proposed Project. **Why not design to this?** | I41-60
73. Appendix D (Transportation Analysis) - Residents know that most of the crashes on Old Mill and Polaris are not reported or reflected in Tables 15-17, because many only involve property damage. This Section *also needs to emphasize* that both these streets include steeper segments that become dangerously icy in the winter. **Please revise to include this information.** | I41-61
74. Appendix D (Transportation Analysis) - *During what specific time periods and for how long* were the Speed Survey data in Table 18 collected? | I41-62

75. Appendix D (Transportation Analysis) - *During what time periods and for how long* were the Bicycle/Pedestrian Count data in Table 19 collected? I41-63

76. Appendix D (Transportation Analysis) - Transportation Safety Impacts must be considered as *contributing elements of a larger issue*. The combination of: adding up to a 100 vehicles, speeding, crashes upon steep and icy sections, pedestrians on a street without sidewalks and limited corner sight distances, and further congesting the only emergency response and evacuation route for two schools, make the conclusion stated here that “the proposed project on site D would not result in a significant transportation safety impact,” both *illogical and unsupportable*. **Please delete it.** I41-64

77. Appendix E (Air Quality & GHG Models) – This Appendix introduces another *confusing and invalid* name for this project. **Please change** “Tahoe Cross Country Ski Lodge” to whatever this project ends up being called. I41-65

78. Appendices E through G - The model outputs for Air Quality, GHG, Noise, and Energy used in these Appendices heavily depend upon *questionable* assumptions that *are much too subjective* to be credible bases for any decisions affecting public safety. **Please explain these limitations.** I41-66

Ascent has done a very impressive job of identifying administrative steps which may offer ways to mitigate certain concerns; but Common Sense cautions that:
“Just because one can do something doesn’t mean one should do it.” I41-67

Summary. The significant number of *questionable* claims and assumptions in the DEIR **do not support** the TCPUD’s stated *Project Objective* to “minimize effects upon the neighborhood” in the DEIR’s Executive Summary. **Please do not:** rush any Board decisions to avoid more restrictive environmental regulations, permit ambitions to overrule common sense, attempt to exploit guidance loopholes or mitigation fee payments to address safety risks, or disregard public requests to include other Alternatives. I41-68

On the other hand, **please do:** use these *Comments* and *Requested Changes* to strengthen the EIR, change course to one that makes this project: far safer, less controversial, and more consistent with the Donor’s intentions and the Schilling family’s wishes to “*preserve*” this Old Tahoe treasure for enjoyment of “*a larger segment* of our community”; and respect the amount of time effort members of the community have taken out of their busy lives to prepare and submit them.

If you have any questions, please email them to us at huffmnty@aol.com.

Very Sincerely,

Roger & Janet Huff

Letter I41 Roger and Janet Huff

July 18, 2020

Response I41-1

The comment provides an introduction to the comment letter with background related to the development of the Project and suggests the TCPUD Board consider the recommendations in the letter. The comment asserts the original proposal was half the size of the proposed Project and did not include more parking, a driveway, and alterations and additions designed for the applicant's members and commercial activities. The comment asserts that controversial projects exhibit red flags associated with impatience and neglecting to correct chronic problems among other issues. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-2

The comment requests more time for the public to review the Draft EIR and provide comments by at least 30 days. The comment's request for an extension to the public review period was not granted. See response to comment I4-1, which explains why the 50-day comment period was not extended. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR.

Response I41-3

The comment requests clarification and correction of a number of terms used throughout the Draft EIR, including Highlands Park and Community Center, Highlands Park Neighborhood, Schilling Lodge, Schilling residence, and TXC Project. See response to comment I25-3, which addresses the use of Highlands Park and Community Center. The term "Schilling residence" refers to the original historic building that would be reconstructed as the Schilling Lodge. See the first two paragraphs on page 2-1 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR. The comment is correct that Highlands Park residential neighborhood should be called Highlands neighborhood. Thus, Impact 3.4-1 in Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," is revised to make this clarification in this Final EIR. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." The correction does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 3 on page 3.4-14 of the Draft EIR is revised to read as follows:

The Schilling residence has been evaluated as eligible as a historic resource under Section 67.6 of the TRPA Code and as eligible for listing in the NRHP under Criterion C related to its architectural character and construction type. The Project proposes to relocate the residence from its original location in Tahoma, adjacent to Rubicon Bay, to the Highlands Park residential neighborhood on lands designated for recreation.

Although Appendix D, "Tahoe XC Lodge Project Transportation Analysis," uses the term "Tahoe XC Project," the description of the Project in this appendix is clear that it is the same project analyzed in the Draft EIR. The comment's assertion that this term and the others mentioned are incorrect and/or confusing does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Response I41-4

The comment asserts that if the Project remains unchanged it would encounter major obstacles or failure. The comment asserts that the Project should incorporate the requested changes in the comment letter to result in a safer, less controversial and more beneficial course for a much larger segment of the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-5

The comment asserts that use of the terms "repurposed" or "adaptive reuse" in the Draft EIR attempts to hide the actual scope of the proposed internal changes and additions to the historic structure. The comment requests that more appropriate and less ambiguous terms be used. See response to comment I10-3, which addresses the use of these terms and provides a summary of how the Draft EIR does provide clarity regarding the scope of the changes to

the historic structure. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-6

The comment asserts that the use of the terms “community uses” and “community needs” are misleading since the Project is designed around TCCSEA’s membership and commercial activities. The comment requests that Chapter 1, “Introduction,” be reworded to address these concerns. See comment I10-4, which addresses how the Project would be used by the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-7

The comment notes that internal changes and external additions to the original historic structure use the terms “adaptive reuse” or “preserve” and requests that more appropriate and less ambiguous terms be used. See response to comment 3, which addresses the use of these terms and provides a summary of how the Draft EIR does provide clarity regarding the scope of the changes to the historic structure. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-8

The comment requests an explanation of how the Project would preserve the financial responsibility and transparency of TCPUD’s property tax funds and how a facility designed around the applicant’s own membership/commercial functions qualifies as being for “community use.” While the comment correctly cites one of the twelve Project objectives listed on pages 2-5 and 2-6 in Chapter 2, “Description of the Proposed Project and Alternative Evaluated in Detail,” in the Draft EIR, the financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. However, as noted on page 2-14 of the Draft EIR, “Special events staged from the Lodge would offer broad access to public recreation resources, help develop and foster community interactions, and help create a sustainable business model for continued public cross-country skiing operations and year round trailhead access.” See response to comment I10-4, which addresses how the Project would be used by the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-9

The comment refers to the last sentence under the second paragraph on page 2-7 in Chapter 2, “Description of the Proposed Project and Alternative Evaluated in Detail,” in the Draft EIR, which states, “Ownership of the Schilling Lodge and associated improvements has not been determined, but could be owned by TCCSEA with a land lease from TCPUD.” The comment asserts that if this statement is true it would be a showstopper for the proposed Project. See responses to comments I10-1 and I10-2, which address concerns related to ownership of the Schilling Lodge. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-10

The comment states that the terms “adaptive reuse,” “public enjoyment,” and “public area,” are misleading in Section 2.5.1 of Chapter 2, “Description of the Proposed Project and Alternative Evaluated in Detail,” of the Draft EIR. Please see response to comment I10-10 for a discussion of adaptive reuse and the retention of character defining features of the Schilling residence. It is unclear how the terms “public enjoyment” and “public area” are misleading because the proposed Project, as well as the Existing Lodge, are intended for public use. As discussed in Chapter 2 of the Draft EIR, the proposed Project would relocate the public functions and operations of the Tahoe XC from the Existing Lodge to the Schilling Lodge. These uses, as described on page 2-3, include Nordic skiing amenities

(including space for ticketing, rentals, retail, waxing skis, a café, and storage), the Strider Glider after school program and middle school and high school students, bike rentals and other trailhead services, the junior mountain bike program, Boy Scouts of America meeting space, Highlands Homeowners Association meeting space, and special events, such as the Lake Tahoe Mountain Bike Race and the Burton Creek Trail Run. Additionally, the Winter Discovery Center accommodates the Sierra Watershed Education Partnership's winter programs, which includes snow science and winter safety education for local students. The Schilling Lodge would also have space dedicated for public lockers, public showers, and have space dedicated for public meetings.

Response I41-11

The comment asks for a description of if or how the applicant would reimburse Placer County and TCPUD for any damages done to the roads and/or infrastructure during construction of the proposed Project. As discussed under Section 2.5.3, "Construction Schedule and Activities," on page 2-22 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR, standard construction equipment would be expected to be used and construction staging would occur on the proposed Project site. The comment does not provide any specific evidence that construction activities would damage public roads or infrastructure. This comment does not raise any issues related to CEQA or provide any specific evidence related to the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-12

The comment asserts that use of the terms "repurposed" or "adaptive reuse" in the Draft EIR attempts to hide the actual scope of the proposed internal changes and additions to the historic structure. The comment requests that Section 2.6.1 be reworded to accurately describe the proposed changes. See response to comment I10-3, which addresses the use of these terms and provides a summary of how the Draft EIR does provide clarity regarding the scope of the changes to the historic structure. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-13

The comment refers to the text following Table 2-5 on page 2-24 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," of the Draft EIR and expresses concern about TCCSEA having primary control over event bookings for both the new facility and the Highlands Community Center. See response to comment I10-2, which addresses concerns related to event bookings at the Schilling Lodge and Highlands Community Center. This comment does not raise any issues related to CEQA or provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-14

The comment expresses the belief that the statement made in Section 3.2.1 of the Draft EIR that the proposed Project would have a less-than-significant impact on aesthetics in the Highlands neighborhood is not realistic. See response to comment I10-5, which addresses concerns related to the potential aesthetic impacts of the proposed Project. This comment does not provide any specific evidence to support their claim that the Project's impact on aesthetics in the Highlands neighborhood would be significant. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-15

The comment expresses the belief that administrative procedures could reduce the potential impacts of locating hundreds of gallons of flammable fuel and other hazardous materials beside two schools with one emergency response and evacuation route to a less-than-significant level is not logical. The comment asserts that CEQA warns against allowing hazardous materials within 0.25-mile from any school. The comment requests deletion of such assertions. See response to comment I10-6, which addresses concerns related to the impact analysis related to hazardous materials, schools, and evacuation routes. See response to comment I25-7, which clarifies the intentions in CEQA related to analyzing hazardous material impacts on schools. This comment does not provide any specific

evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-16

The comment disagrees that allowing 100 more vehicles per day onto the only emergency response and evacuation route for the schools would be a less-than-significant impact. The comment requests deletion of such assertions. See response to comment I10-7, which addresses concerns about the proposed Project's additional traffic and potential effects on emergency response and evacuation. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-17

The comment disagrees with the assumptions made in Section 3.2.9, "Wildfire," in the Draft EIR that the proposed facility would not attract more visitors, most visitors would be local, and the increased number of activities and large events would not increase wildfire risks. The comment inaccurately states that Section 3.2.9 states that the Project would not attract more visitors. See response to comment I10-8, which provides rationale for the wildfire impact conclusion and the assumptions made in the wildfire impact analysis. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-18

The comment takes issue with the statement, "the assertion of no sensitive habitats or biological communities such as wetlands, streams, SEZs, etc." in Section 3.3, "Biological Resources," of the Draft EIR and analysis of impacts on common species that could be affected by the Project. As described in Section 3.10, "Hydrology and Water Quality," the proposed Project site and Alternative A site do not contain stream or water bodies and are not in the 100-year flood hazard zone for any stream or water body. The Alternative A site is located approximately 700 feet south of the perennial Dollar Creek; Lake Forest Creek is an intermittent stream in the reach that passes approximately 200 feet to the east of the proposed Project site.

With respect to aquatic features outside but near the proposed Project site and Alternative A site, Impact 3.10-1 (Potential for Project Construction to Degrade Surface or Groundwater Quality) in Section 3.10 of the Draft EIR concluded that any potential Project-related effects on water quality would be minor and less than significant. All construction projects in the Tahoe region must meet requirements and regulations of TRPA, the Lahontan Regional Water Quality Control Board (Lahontan RWQCB), Placer County, and federal, other state, and local agencies. The TRPA Code restricts grading, excavation, and alteration of natural topography (TRPA Code Chapter 33). In addition, all construction projects located in California with greater than 1 acre of disturbance are required, by Lahontan RWQCB, to submit a National Pollutant Discharge Elimination System permit, which includes the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that includes site-specific construction site monitoring and reporting. Project SWPPPs are required to describe the site, construction activities, proposed erosion and sediment controls, means of waste disposal, maintenance requirements for temporary BMPs, and management controls unrelated to stormwater. Temporary BMPs to prevent erosion and protect water quality would be required during all site development activities, must be consistent with TRPA requirements, and would be required to ensure that runoff quality meets or surpasses TRPA, state, and federal water quality objectives and discharge limits.

Regarding species addressed in the Draft EIR, the significance criteria established for biological resources (page 3.3-13 of the Draft EIR) determined which species or groups of species were analyzed in the greatest detail. Although special-status species were the primary focus of analyzing Project effects on individual species, based on their sensitivity and in accordance with the significance criteria, common migratory birds and Project requirements to protect active nests were addressed in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," as referred to in Section 3.3, "Biological Resources;" and, common species generally are addressed in Impact 3.3-2 (Tree Removal),

Impact 3.3-3 (Potential Establishment and Spread of Invasive Plants), Impact 3.3-4 (Potential Degradation or Loss of Wildlife Movement Corridors), and Cumulative Impacts in Section 3.3 of the Draft EIR.

Response I41-19

The comment states that the proposed Project would require both CWA and TRPA permits due to the seasonal stream mentioned in comment I41-8, in addition to TRPA permits for tree removal. As described in Section 3.3.1, "Regulatory Setting," in Section 3.3, "Biological Resources," of the Draft EIR, Section 404 of the CWA (33 USC Section 1251 et seq.) requires a project applicant to obtain a permit before engaging in any activity that involves any discharge of dredged or fill material into waters of the United States, including wetlands. No wetlands or other waters of the United States subject to CWA jurisdiction are located on the proposed Project Site or the Alternative A site; and the Project is not expected to cause fill of waters of the United States or substantial degradation of water quality outside the sites, as discussed in response to comment I41-18. Regarding TRPA permits, as described in the Draft EIR, all construction projects in the Tahoe Basin, including the proposed Project and Alternative A, must meet requirements and regulations of TRPA, Lahontan RWQCB, Placer County, and federal, other state, and local agencies. Tree removal and project requirements to obtain appropriate permits are described in detail in Section 3.3.1, "Regulatory Setting," and Impact 3.3-2 (Tree Removal) of the Draft EIR. The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I41-20

The comment states that Project-related tree removal described in Impact 3.3-2 (Tree Removal) is inconsistent with the conclusion that the proposed Project would not substantially affect common species. Whether tree or other vegetation removal would cause a substantial effect on common species depends on the magnitude and intensity of the disturbance, quality of habitat affected, the sensitivity of a species population to the disturbance, and other factors. The rationale for why the magnitude and type of tree removal proposed would not substantially affect a common species is described in Impact 3.3-2. The trees and stands in the proposed Project and Alternative A sites are not considered critical or limiting to the presence or viability of common or sensitive biological resources in the region. Additionally, tree removal or other vegetation disturbances would not substantially reduce the size, continuity, or integrity of any common vegetation community or habitat type or interrupt the natural processes that support common vegetation communities on the proposed Project site. The proposed Project would also not substantially change the structure or composition of forest habitat in the proposed Project vicinity. The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I41-21

The comment expresses disagreement with the conclusion in Impact 3.3-4 of the Draft EIR that the proposed Project is not expected to substantially affect important wildlife movement corridors, and references common species such as black bear and coyote. See response to comment I10-9.

Response I41-22

The comment believes that the proposed Project should not be considered "Rehabilitation." Please see response to comment I10-10 for a discussion of "Rehabilitation" as defined by the Secretary of the Interior's Standards.

Response I41-23

The comment states that the proposed Project would result in a significant cumulative impact to historic resources. The ten Standards for Rehabilitation, as listed on page 3.4-3 of the Draft EIR, include that, "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." As detailed on page 3.4-15 of the Draft EIR, the addition would be required to comply with the requirements of the Secretary of Interior's Standards, as acknowledged in the "Adaptive Reuse of the Schilling Residence" section in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail." The addition would not destroy historic materials that characterize the property, would be differentiated from the original building yet compatible with the original building's design. For

these reasons, the addition to the Schilling residence as part of the proposed Project would not substantially alter the historic character of the Schilling residence and therefore would not contribute to a cumulative impact.

Response I41-24

The comment states that the paragraphs regarding access to bicycle trails or transit stops are irrelevant to public concerns about the proposed Project. Additionally, the comment takes issue with the conclusions related to emergency response and evacuation.

The comments related to access to bicycle trails and transit stops does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary.

As detailed on page 3.5-1 of Section 3.5, "Transportation," in the Draft EIR, the potential for the Project to interfere with implementation of an adopted emergency response plan or emergency evacuation plan is discussed in Section 3.2.3, "Hazards and Hazardous Materials." Additionally, the comment does not provide any evidence or data to support the claim that the analysis of the proposed Project's effect on emergency response and evacuation is inadequate. See also response to comment I10-7. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-25

The comment takes issue with the Draft EIR's conclusions regarding the effects of increased traffic associated with the proposed Project on public safety. No specific comments are provided on the contents of the Draft EIR and no information is provided that would alter or change the Draft EIR analysis; and thus, further response is not possible. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-26

The comment states that the current descriptions of both Old Mill Road and Polaris Road are insufficient because they would become main access and egress routes for the proposed Project, and they both include steep segments that often become quite icy and much more dangerous during the winter. The comment requests that these descriptions be re-worded to include this information.

Please see Master Response 1: Transportation Safety. The description of local roads on page 3.5-8 in Section 3.5, "Transportation," of the Draft EIR are brief descriptions based on existing roadway geometrics, site access, and roadway classifications. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-27

The comment states that the proximity of bicycle paths, the Dollar Creek shared-use path, striped bicycle lanes on SR 28, and unpaved trails are irrelevant to documented public concerns about the increased car and bus traffic that the proposed Project would have on the safety of residents, neighborhood students, and gym classes that routinely use Polaris Road. The comment states that this information should be deleted, and the focus of the analysis should be on roadway safety along Polaris Road. The comment does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary.

Response I41-28

The comment states that the assertion within the Draft EIR that the Schilling Lodge is not expected to increase skier visitation to the site is unsupported by objective analysis and inconsistent with the increased size of the proposed Project. Additionally, the comment states that the 10 percent estimate is a guess at best in estimating impacts traffic would have upon public safety and the environment. The comment concludes that this assertion should be supported with objective data or deleted.

As stated on page 3.5-12 of the Draft EIR, trip generation at a ski area or trailhead is typically a function of the skiable terrain, snow conditions, and skier capacity rather than lodge amenities. Therefore, because the proposed Project would not alter the terrain or skier capacity, the number of skiers expected to visit the site is expected to be the same as the number that currently travel to the Existing Lodge. Additionally, it is stated on page 3.5-12 of the Draft EIR that while

additional visitation is not expected for the aforementioned reasons, the analysis takes a conservative approach and assumes skier visitation during winter conditions would increase by 10 percent. Therefore, as described above, the analysis of transportation impacts in the Draft EIR is not only adequate, it is conservative based on substantial evidence, including data collected and modeled for a typical busy day at Tahoe XC. The comment provides no evidence in support of the statement that the increase in skier visitation (10 percent) is inaccurate and not supported by data. See response to comment O1-4, which also addresses concerns related to the estimated increase in visitation associated with the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-29

The comment states that TCPUD's correspondence files reveal that multiple residents specifically requested that the Draft EIR properly address the safety risks associated with Project-generated traffic increases on pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris Road between the schools and Heather Lane. The comment concludes by requesting that future versions of the EIR address this issue.

Please see Master Response 1: Transportation Safety. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-30

The comment states that the basis for the current trip generation assumptions are not provided and too subjective. The comment adds that such questionable assumptions should not serve as a basis for decisions about the impacts increased traffic associated with the proposed Project would have on public safety, the environment, or the Highlands neighborhood. The comment concludes by stating that the trip generation assumptions should be supported with objective data or deleted.

Please see response to comment I41-28. Additionally, the "Methods and Assumptions" section starting on page 3.5-12 of Section 3.5, "Transportation," in the Draft EIR provides a detailed reasoning and justification for the trip generation rates used to analyze the transportation impacts of the proposed Project. Finally, the comment does not provide any evidence that trip generation applied to the Project is insufficient. No changes to the Draft EIR are required.

Response I41-31

The comment alleges that the majority of the speeds recorded on Polaris Road are above the posted speed limit and it is not logical to assume the addition of up to 100 more visitor vehicles a day would decrease speed.

Although the majority of speeds recorded on Polaris Road were above the speed limit, they were typically within 5 mph of the speed limit and below the design speed of 35 mph. Additionally, the comment is incorrect in the assertion that the analysis assumes Project-generated traffic would decrease speed. Please see Master Response 1: Transportation Safety, for details related to speeding. Additionally, the comment incorrectly asserts that Section 3.5, "Transportation," in the Draft EIR states that speeds would decrease with the addition of Project-generated trips. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-32

The comment states that administrative guidelines may be attractive mitigation options, but whoever established the traffic volume threshold of 2,500 vehicles/day clearly would not enjoy living on such a residential street and would not like their children on it either.

The comment pertains to an established Placer County standard. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-33

The comment questions the basis for the size of the proposed parking area. The comment poses a question and does not raise any CEQA issues or address the adequacy of the EIR analysis. See response to comment O1-3 regarding parking demand. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-34

Please see response to comment I10-12, which addresses a similar comment related to lane/street closures, redirection of traffic, staging of heavy vehicles, etc. in a residential neighborhood like the Highlands neighborhood.

Response I41-35

The comments states that the cumulative transportation analysis needs to consider the Dollar Creek Crossing project when evaluating pedestrian safety on Polaris Road.

As detailed on pages 3.5-31 and 3.5-32 under the "Cumulative Impacts" section of Section 3.5, "Transportation," of the Draft EIR, the Dollar Creek Crossing project was included in the future cumulative background traffic volumes used in the cumulative transportation analysis.

Additionally, as detailed in Master Response 1, increasing traffic along a roadway lacking pedestrian or bicycle facilities does not necessarily constitute a safety impact under CEQA. The Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and did not identify any safety impacts. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-36

The comment questions the applicability of the air quality mitigation fees. See response to comment I10-13 for a discussion on how mitigation fees are addressed in the Draft EIR, the application of mitigation fees during environmental review in general, and the Project's regulatory requirements under TRPA Code. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-37

The comment asserts that the Draft EIR incorrectly identified sensitive receptors in Section 3.6, "Air Quality," and that due to wind patterns, air pollution would affect sensitive receptors in the Highlands neighborhood east of the Project. See response to comment I10-14 for a discussion of sensitive receptors and characteristics of air pollution. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-38

The comment questions the assumptions in the traffic study that informed the findings of the air quality analysis. See response to comment I10-15 for a discussion of the traffic study and TPCUD's discretionary role as lead agency for the Project. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-39

The comment states concern regarding the use of mitigation fees in the cumulative air quality discussion. See Response I10-13 for a discussion on how mitigation fees are addressed in the Draft EIR, the application of mitigation fees during environmental review in general, and the Project's regulatory requirements under TRPA's Code. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-40

The comment asks how TRPA's requirement to limit idling time for heavy-duty diesel engines to 5 minutes would allow for construction traffic staging. TRPA Code Section 65.1.8, Idling Restrictions, limits idling for certain diesel engines to no longer than 5 minutes in California. This is a regulatory requirement to which the Project will be beholden. The efficacy of TRPA Code Section 65.1.8, and other portions of the TRPA Code that relate to air quality, is monitored through a comprehensive multi-agency air quality program. The Project would be subject to the requirements of the TRPA Code and is assumed to restrict idling for diesel-fueled vehicles in accordance with

Section 65.1.8. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-41

The comment requests that the construction timetable in Section 3.7 of the Draft EIR be updated to reflect the current Project status. Page 3.7-13 summarizes the assumed construction schedule commencing in May 1, 2020 and ending in June 2023, which was the schedule that was known at the time the modeling was completed for the Draft EIR. The fourth paragraph on page 3.7-13 of the Draft EIR, excerpted below, explains the changes in construction duration between modeled estimates and the updated, reduced construction duration. Because the estimated timing for construction of the Project to begin has been delayed from originally anticipated in the Draft EIR, estimated construction timing referenced in Section 3.7, "Greenhouse Gas Emissions and Climate Change," is updated below and in Chapter 2, "Revisions to the Draft EIR," in this Final EIR.

The fourth paragraph 4 on page 3.7-13 of the Draft EIR is revised as follows:

[c]onsistent with Chapter 65 of the TRPA Code of Ordinances, construction of the Project was assumed to be limited to May 1 through October 15. Based on assumptions developed in the initial planning stages for the Project, construction was assumed to commence on May 1, 2020 and end in June 2023, when the Project would become operational. However, as described under Section 2.5.3, 'Construction Schedule and Activities,' Project construction activities may be completed faster, estimated to beginning in 2024~~2022~~ instead of 2020 and completed in 2 years rather than 4 years. Construction would be limited to Monday through Friday within exempt hours.

The current construction schedule, which would commence at a later date, would produce a similar, or arguably, lower level of GHG emissions as regulatory mechanisms that reduce emissions such as CARB's Advanced Clean Cars program and the Renewable Portfolio Standards' yearly renewable targets under Senate Bill 100 would reduce transportation and energy-related emissions. Therefore, the assumed construction schedule commencing in May 1, 2020 and ending in June 2023 provides a more conservative estimate of emissions, which are mitigated for by Mitigation Measure 3.7-1 beginning on page 3.7-17 of the Draft EIR. Impact 3.7-1, "Project-Generated Emissions of GHGs," is revised to reflect the conservative nature of the GHG emission modeling compared to the Project construction timeline that may actually occur as described herein.

The fourth paragraph on page 3.7-15 of the Draft EIR is revised to read as follows:

Proposed Project construction activities would result in the generation of GHG emissions. Heavy-duty off-road construction equipment, materials transport, and worker commute during construction of the Project would result in exhaust emissions of GHGs. There would be no construction associated with the Highlands Community Center. Table 3.7-4 summarizes the projected emissions associated with construction of the Project by year (2020-2023). As mentioned above under "Methods and Assumptions," and in Section 2.5.3, "Construction Schedule and Activities," the Project was initially anticipated to be constructed over an up to 4 year period and was anticipated to begin in 2020, which is reflected in Table 3.7-4 below. In the event that construction activities are completed faster than presented here, estimated to beginning in 2024~~2022~~ instead of 2020 and completed in as few as 2 years rather than 4 years, the GHG emissions shown in separate years in the table would be combined over fewer years. The emissions generated over a shorter timeframe would not change the impact conclusion provided below. Additionally, if construction activities begin at a later time than initially anticipated, potentially lower levels of GHG emissions would be generated as a result of compliance with regulatory mechanisms that reduce transportation and energy-related emissions such as CARB's Advanced Clean Cars program and the Renewable Portfolio Standards' yearly renewable targets under Senate Bill 100. See Appendix D for detailed input parameters and modeling results.

Response I41-42

The comment suggests Mitigation Measure 3.7-1 be updated to limit the size of the parking area to that based on the average number of vehicles on an average operating day. Page 3.7-18 of the Draft EIR addresses the use of parking restrictions as a feasible onsite mitigation measures and dismisses parking restrictions as infeasible to enforce due to

Project-specific variables “associated with spillover parking into nearby residential neighborhoods during peak seasonal periods.” Thus, Mitigation Measure 3.7-1 does not include parking restrictions as a method to reduce GHG emissions. For this reason, the measure has been reviewed and does not require edits in response to this comment. See also response to comment O1-3 regarding the parking analysis conducted for the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-43

The comment states that the assumptions used to conduct the traffic noise modeling are subjective and that objective data should be used. As described on page of 3.8-19 of the EIR a 10 percent increase in traffic was used to estimate traffic noise increases. This assumption is further explained on page 3.5-13 in Section 3.5, “Transportation,” and was used to provide a conservative worst-case scenario. It is unlikely that the proposed Project would result in this level of traffic, and associated noise increase; thus, using this conservative assumption to evaluate noise impacts, which were found to not exceed a standard, ensures that Project-generated traffic noise increases would be even less than what was reported in the EIR, and therefore, also not result in a substantial increase in traffic noise that would exceed any applicable standard. No further analysis is necessary.

Response I41-44

This comment notes that TRPA Policy S-1.7 is applicable to the Project. This comment is correct and this policy is listed on page 3.9-3 in the regulatory setting in Section 3.9, “Geology, Soils, Land Capability, and Coverage,” of the Draft EIR for that reason. No further analysis is necessary.

Response I41-45

This comment requests that the discussion of local geology state that the proposed Project site drains to a stream environment zone (SEZ) rather than describing the creek that the site drains toward. The comment also asks for a reassessment of SEZ effects related to the presence of an SEZ adjacent to Lake Forest Creek. There is value in clarifying that the SEZ areas found within the proposed Project site are associated with Lake Forest Creek; however, this addition would be better suited to the discussion of “Land Capability and Coverage” beginning on page 3.9-8 of the Draft EIR rather than the “Local Geology” section. Additionally, the SEZ in question is included in the summary of land capability classification within the proposed Project site found on page 3.9-8 of the Draft EIR and clarifying its association with Lake Forest Creek does not result in a need for reassessment of SEZ effects. This Final EIR includes revisions to reflect this clarification. The change is presented below and in Chapter 2, “Revisions to the Draft EIR.” The addition of this information does not alter the conclusions with respect to the significance of any environmental impact.

In response, the third paragraph on page 3.9-8 of the Draft EIR is revised as follows:

These parcels are predominately mapped as LCD 5 (which allows up to 25 percent coverage) and LCD 6 (which allows up to 30 percent land coverage); however, the Alternative A site contains approximately 6,021 sq. ft. of LCD 1b (allowing only 1 percent land coverage), in the SEZ area adjacent to Lake Forest Creek.

Response I41-46

This comment asks that Impact 3.9-2 assess how the excavation of the basement for the Shilling Lodge would affect silt and sediment transport to the Lake Forest Creek SEZ. The potential for erosion and sediment transport is discussed in Impact 3.9-1 beginning on page 3.9-11 of the Draft EIR. As described therein, the proposed Project would comply with all TRPA and Lahontan RWQCB protections to control soil erosion and protect adjacent SEZ areas. No further response is required.

Response I41-47

This comment asks that the statement on page 3.10-1 of the Draft EIR, which notes that neither the proposed Project site nor the Alternative A site contain stream or water bodies, be modified to acknowledge that the sites drain to an SEZ that leads to Lake Tahoe. The statement in question relates specifically to water currents, stream volumes, or flood hazards. Therefore, including SEZ areas in this discussion would not be appropriate. The connectivity of the proposed Project site and the Alternative A site to local water bodies is described in Section 3.10.2, “Environmental Setting,” of the Draft EIR. No further response is required.

Response I41-48

The comment asserts that the claim in Section 3.1.1 of the Draft EIR that no mitigation measures would be required is incorrect because TRPA Policy and NTFPD Code prohibits development if there is not adequate water for domestic use and fire protection and in light of a recent wildfire in the neighborhood. See response to comment I10-16, which addresses concerns related to water supply and regarding the wildfire mentioned in the comment. The comment offers an opinion but no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I41-49

The comment questions the methodology used to estimate water demands of the proposed Project. See response to comment I10-17, which addresses concerns related to the water demand analysis in the Draft EIR. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR.

Response I41-50

The comment requests that in light of comments addressed in responses to comments I41-48 and I41-49, mitigation should be required for the proposed Project and the cumulative impact conclusion related to water demand impacts should be revised. For the reasons discussed in response to comment I10-17 that address the potential water demand impact of the proposed Project, there would not be a need to adopt mitigation for the proposed Project and there would not be a significant cumulative impact related to water supply associated with the proposed Project. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment.

Response I41-51

The comment suggests the Draft EIR analyze an alternative that considers no expansion to the Schilling Lodge building, minimal internal modifications, limiting the parking onsite while also minimizing on-street parking, and transferring ownership to TCPUD. See response to comment I10-18, which explains why the comment's suggested alternative is not considered for further analysis. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-52

The comment takes issues with the conclusions in Section 4.8.5, "Conclusion," in Chapter 4, "Alternatives." The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-53

The comment requests that the statement related to the number of attendees at large special events in Section 5.1.3, "Growth-Inducing Effects of the Project," be supported by data. Table 2-3 on page 2-13 and the "Premier Events and Large Special Events," section on page 2-14 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR identify and describe the maximum number of people that could attend large special events. Although there would be a small increase in the number of large special events throughout the year at the Schilling Lodge compared to the number that occur under existing conditions at the Highlands Community Center, it is assumed that the capacity of the "Other Large Special Events" would be limited by the number of parking spaces and average occupancy for each vehicle and assumes that under existing conditions, although the parking lot is smaller, event attendee parking overflows onto the nearby residential streets. For the "Premier Events," the anticipated maximum number that is assumed is based on previous attendance at existing "Premier Events" like the Great Ski Race. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-54

The comment disagrees with the statement in Section 5.4, "Significant and Unavoidable Adverse Impacts," on page 5-3 of the Draft EIR that the proposed Project and Alternative A would not result in significant and unavoidable impacts. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-55

The comment asserts that the use of the phrases "community gathering space," "community gathering amenity," and "asset for the entire community" in Appendix B, "Schilling Lodge Management Plan," are misleading since the Project is designed around TCCSEA's membership and commercial activities. See comment I10-4, which addresses how the Project would be used by the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-56

The comment requests clarification in Appendix B, "Schilling Lodge Management Plan," if alcohol would be permitted on the premises of the Schilling Lodge. See responses to comments I10-19 and I35-6, which address concerns related to the presence of alcohol at the Schilling Lodge. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-57

The comment states that the additional traffic to/from the proposed Project would cause the total daily traffic volume on Polaris Road to exceed the threshold for residential streets.

As stated on page 3.5-21 of Section 3.5, "Transportation," in the Draft EIR, neither the proposed Project nor Alternative A would result in an exceedance of Placer County's 2,500 vehicles per day standard for residential roadways. The average daily traffic (ADT) figures on this page include arrival and departure trips made on the same day. For instance, a vehicle going to the school and back would generate two daily one-way vehicle trips. As such, the additional traffic to/from the proposed Project would not cause the total to exceed the 2,500 vehicles per day threshold for residential streets. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-58

The comment questions why the winter trip generation analysis for the proposed Project assumes that gathering events start during the p.m. peak hours, versus the a.m. peak hour on a school day.

The gathering event at the proposed lodge is assumed to start during the p.m. peak hour to evaluate a "worst case scenario" in which event related traffic volumes are added to the p.m. peak-hour conditions, which are demonstrated to have greater traffic volumes in the area; thus, yielding a conservative intersection operations (level of service) analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-59

The comments the third bullet under the Future Cumulative Conditions segment in Appendix D (Transportation Analysis) of the Draft EIR be revised to describe that the Dollar Creek Crossing project would likely add neighborhood student pedestrians on Polaris Road that should be considered in the analysis.

As detailed in Master Response 1, increasing traffic along a roadway lacking pedestrian or bicycle facilities does not necessarily constitute a safety impact under CEQA. The Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and did not identify any safety impacts. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-60

The comment states that Figure 11 in Appendix D (Transportation Analysis) of the Draft EIR reveals that the vast majority of the time, onsite parking can be accommodated with a much smaller area than in the proposed Project. The comment concludes by asking why the parking lot was not designed according to this lower parking demand.

As detailed on page 3.5-18 of the Draft EIR, the parking analysis evaluates the current demand of the Existing Lodge and determines the capacity needed at the Schilling Lodge. The parking demand analysis was developed to ensure that adequate onsite parking would be provided such that operation of the project would not result in visitors having to park on the surrounding residential streets. See response to comment O1-3 regarding the parking analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-61

The comment states that residents know that most of the crashes on Old Mill Road and Polaris Road are not reported or reflected in Tables 15-17 in Appendix D (Transportation Analysis) of the Draft EIR because many only involve property damage. The comment concludes that this section also needs to emphasize that both these streets include steeper segments that becomes dangerously icy in the winter and should be revised to reflect this information.

Please see Master Response 1: Transportation Safety. The comment does not provide any evidence to support the assertion that most of the collisions along Old Mill Road and Polaris Road are not reflected in Tables 15-17 in Appendix D of the Draft EIR. No further response is necessary.

Response I41-62

The comment asks during what periods and for how long the speed survey data was collected.

The footnote in Table 18 on page 59 of the Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR states that the speed surveys were conducted during periods with good road conditions (not snowy/icy or raining) from Tuesday March 26 through Wednesday April 3, 2019. Specifically, the data from March 26-27 and March 29-April 1 was used. Data from March 28 and April 2-3 was not used (as these days did not have good road conditions). The comment poses a question and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-63

The comment asks when and for how long the bicycle and pedestrian count data in Table 19 was collected. The footnote in Table 19 on page 62 of the Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR states that bicycle and pedestrian counts were conducted at three intersections along Polaris Road during the morning and afternoon peak periods of school-related traffic activity on Tuesday, September 11, 2018. Specifically, the counts were conducted from 7:00-9:00 a.m. and from 2:00-4:00 p.m. The comment poses a question and does not address the adequacy of the EIR analysis. No further response is necessary.

Response I41-64

The comment states that transportation safety impacts must be considered as contributing elements of a larger issue and questions the impact determination.

Please see Master Response 1: Transportation Safety. Additionally, as detailed on page 3.5-1 of Section 3.5, "Transportation," of the Draft EIR, the potential for the Project to interfere with implementation of an adopted emergency response plan or emergency evacuation plan is discussed in Section 3.2.3, "Hazards and Hazardous Materials."

The comment does not provide any data or evidence to contradict the conclusions of the transportation safety analysis or analysis of effects on emergency response and evacuation in the Draft EIR. Therefore, no further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-65

The comment refers to the use of the term "Tahoe Cross Country Ski Lodge" in Appendix E, "Air Quality and Greenhouse Gas Emissions Modeling Outputs," in the Draft EIR and requests the term be revised. Although Appendix E in the Draft EIR uses the term "Tahoe Cross Country Ski Lodge Site D," the modeling provided in this appendix was based on the characteristics of the proposed Project described in Chapter 2 of the Draft EIR. The comment's assertion that this term is confusing or invalid is not evidence related to the adequacy, accuracy, or completeness of the Draft EIR.

Response I41-66

The comment asserts that the modeling outputs for Appendix E through G (air quality, GHG, noise, and energy) in the Draft EIR depend upon questionable assumptions that are subjective. The comment is general in nature, does not question any specific assumptions, and does not offer alternative assumptions to be considered.

Appendix E includes the air quality and GHG modeling outputs that informed the significance determinations for the Project. Emissions of criteria air pollutants and GHG emissions were modeled using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 as recommended by PCAPCD and other air districts throughout the state. Modeling inputs were derived from Project-specific characteristics (e.g., anticipated vehicle generation, acres to be graded) where available, and CalEEMod default values were used where Project-specific information was unavailable. The comment does not raise any specific issue with the modeling contained in Appendix E, but rather provides general dissatisfaction with "limitations" associated with Appendix E. Without any specific information provided in the comment to respond to, a detailed response cannot be provided beyond what was summarized on pages 3.6-11, 3.6-12, and 3.7-13 of the Draft EIR.

Appendix F includes noise modeling inputs and outputs that informed the significance determinations for the Project. Specifically, construction noise and vibration levels, long-term increases in traffic noise, and noise associated with outdoor activities were modeled. Project-generated construction source noise and vibration levels were determined based on methodologies, reference emission levels, and usage factors from Federal Transit Administration (FTA), Federal Highway Administration (FHWA), and Caltrans. Reference levels for noise and vibration emissions for specific equipment or activity types are well documented and the usage thereof common practice in the field of acoustics. With respect to non-transportation noise sources (e.g., stationary) associated with Project implementation, the assessment of long-term (operational-related) impacts was based on reconnaissance data, reference noise emission levels, and measured noise levels for activities associated with Project operation (e.g., outdoor events, amplified sound), and standard attenuation rates and modeling techniques. Reference noise levels and measurements conducted are referenced and included in the appendix. To assess potential long-term (operation-related) noise impacts resulting from Project-generated increases in traffic, noise levels were estimated using calculations consistent with the FHWA's Traffic Noise Model Version 2.5 and Project-specific traffic data, which was included in Appendix C. Traffic noise model inputs included reference noise emission levels for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and ground attenuation factors, which were determined based on site-specific parameters such as speed limits on modeled roads. All calculations and noise propagation methods are well documented in the appendix and are consistent with methods recommended by FTA, FHWA, and Caltrans. Without any specific information provided in the comment to respond to, a detailed response cannot be provided beyond what was summarized on page 3.8-13 of the Draft EIR.

Appendix G summarizes the calculations that were performed to estimate the anticipated gasoline and diesel-fuel consumption during Project construction and operation, and electricity and natural gas combustion at full buildout. Construction-related fuel consumption was calculated for CalEEMod default heavy-duty construction equipment based on anticipated hourly daily usage, the number of days used, and worker commute trip VMT. Yearly operational consumption of electricity and natural gas were determined by the default CalEEMod energy consumption values for the Project's land uses. Operational diesel and gasoline consumption was calculated using CARB's 2014 Emissions FACTor (EMFAC) model (CARB 2014) and annual proposed Project- and Alternative A-generated VMT. Where Project-specific information was not known, CalEEMod default values based on the Project's location were used. The comment does not raise any specific issue with the modeling contained in Appendix F, but rather provides general dissatisfaction

with “limitations” associated with Appendix F. Without any specific information provided in the comment to respond to, a detailed response cannot be provided beyond what was summarized on page 3.12-6 of the Draft EIR.

No edits to the Draft EIR are required in response to this comment. The comment is noted.

Response I41-67

The comment states that an impressive job has been done by Ascent identifying administrative steps that may offer ways to mitigate some Project concerns, but common sense cautions that just because someone can do something does not mean one should do it. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-68

The comment provides closing remarks to the comment letter and summarizes general comments provided earlier in the letter. See responses to the comments provided above. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Eric Poulsen](#)
To: [Kim Boyd](#)
Cc: [Rick Ganong](#)
Subject: Schilling Lodge
Date: Sunday, July 19, 2020 9:49:29 AM

**Letter
I42**

Good morning Kim -

We understand that you are working on the CEQA Process for the Schilling Lodge.

This is an important project for the north Lake Tahoe area and the future of the Nordic and biking center.

“ One important CEQA consideration about this project is that it is moving this building from a more sensitive location in the Tahoe basin to a better location with fewer impacts.”

It will enhance and benefit future recreation users for the area.

We are in support and agreement that this important project should move forward.

Thank you for your consideration and help in moving this important project forward.

Eric and Nanette Poulsen

PO Box 2491

Olympic Valley, CA 96146

Sent from my iPhone

I42-1

Letter I42 Eric and Nanette Poulsen

July 19, 2020

Response I42-1

The comment includes background information about the letter’s author, summarizes benefits of the proposed Project, and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Jim Phelan](#)
To: [Kim Boyd](#)
Subject: Schilling Lodge project
Date: Sunday, July 19, 2020 10:58:37 AM

**Letter
I43**

Hi Kim,

After quickly reviewing the Schilling Lodge project, it appears this project has quite a few qualities that determine it to be a well thought out and seems to address and perhaps correct several issues with the current cross country facility. I have only 2 comments at this time, 1) I was curious to understand why a drive through driveway was not considered having one entrance as shown near the school and one off of Cedarwood (as shown as an alternative driveway, perhaps having 2 ways in and out of the facility could help minimize the pressure on Polaris drive during busy school hours. 2) Not understanding the dynamics of making changes to the trail system at the end of any given day if you are stuck at the bottom of the trail system, (location of current lodge), people will need to hike up to get back up to the lodge, is there an alternative to skating or skiing back up the trail to the Lodge?

I think it is wonderful to have an historic building as a ski lodge, it fits Tahoe's character well. Thank you for the opportunity to comment. Jim Phelan

I43-1
I43-2
I43-3
I43-4

Letter I43 Jim Phelan

July 19, 2020

Response I43-1

The comment expresses support for the proposed Project and the analysis in the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I43-2

The comment asks why a drive through driveway from Polaris Road to Cedarwood Drive was not considered to relieve pressure on Polaris Road during school hours. Two alternatives were considered for the Project that included access from Cedarwood Drive: (1) Site D – Alternative Driveway, which would have constructed a driveway to Site D from Cedarwood Drive; and (2) Site C – Site at the End of Cedarwood Drive, which would have constructed the lodge at the end of Cedarwood Drive. As discussed on page 4-3 in Chapter 4, "Alternatives," in the Draft EIR for Site D – Alternative Driveway:

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. 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.

As discussed on page 4-5 of the Draft EIR for Site C – Site at the End of Cedarwood Drive:

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.

A pull-through driveway would have similar concerns as the Site D – Alternative Driveway alternative and Site C – Site at the End of Cedarwood Drive alternative and would not substantially reduce any environmental impacts as compared to the Project. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I43-3

The comment asks a question about whether or not there is an alternative to skating or skiing back up the trail to the Schilling Lodge at Site D if a person ends up at the bottom of the hill. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I43-4

The comment expresses the opinion that they think it is wonderful to have a historic building as a ski lodge. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

750 John McKinney
Truckee, California 96161

Letter
144

July 19, 2020

To Whom It May Concern:

As a full-time of the Tahoe-Truckee community for nearly 20 years, and a passholder of Tahoe XC since moving to the area, I like to keep an eye on developments at Tahoe XC. The project being considered now is the biggest, most exciting effort for the Tahoe XC program in all my years here. This project has an opportunity to improve what Tahoe XC delivers to the community AND concurrently add a historical jewel to Tahoe's north shore by incorporating the historic Shilling Lodge. This would be a wonderful long-term asset to our area, preserving an important part of Lake Tahoe history for future generations.

I was very pleased to see the June 2020 draft Environmental Impact Report for the Tahoe Cross Country lodge replacement/expansion project. I have reviewed the EIR in detail and am impressed by the thoroughness of the document. It's clear that the key issues were identified and diligently analyzed. I was pleasantly surprised by the degree to which environmental concerns were identified, evaluated, and the report offers, practical suggestions for how to offset/mitigate those impacts.

I fully support the goals of and the project, the EIR considers a variety of variations/options for the project. I would like to see the full project proposed for site D move forward. I believe Alternative A (full project, site A) doesn't address key long-term concerns for the viability of Tahoe XC — site D due its elevation and snow melt patterns appears to be far better suited to keeping XC trails open for longer periods for public use, and for keeping Tahoe XC in business.

Another motivation for supporting the full project at site D is that this initiative has the hallmark signs of a big winner — a real "home run" for our community, with identifiable long-term benefits.

I44-1

I've served on boards of directors of both for-profit and nonprofit organizations. I've seen many proposals in which a range of project solutions is put forth; typically "compromise" project variations with reduced scope are outlined with the goal to reduce expenses, minimize disruption, or to quiet loud "squeaky wheels" that seek to derail progress. Unfortunately, when less than ideal projects win out, outcomes are often compromised: benefits are more often than not disproportionately reduced, with lower return on investment; minimum disruption often leads to minimized benefits. Worse still, long-term needs are not met, which translates to yet more project requests sooner (or abandonment of the core business altogether because the hurdles of moving forward are perceived as insurmountable).

The Tahoe XC/Schilling Lodge Project feels like it has the potential to be a huge home run for our community, with lasting payoffs, particularly so at preferred site D. It would be a shame to turn our backs on the opportunity and settle for something less.

I44-1
cont.

Respectfully yours,
John Gerbino

Letter I44 John Gerbino
July 19, 2020

Response I44-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, expresses support for the proposed Project, and expresses support for the analysis in the Draft EIR. The comment supports locating the Project at Site D, on the basis of elevation and snow melt patterns allowing for a longer recreation season. Additionally, the comment expresses concern that Alternative A does not fully address key long-term concerns for the viability of the Tahoe Cross-Country Lodge. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

To: Tahoe City Public Utility District
Fr: Tracy Owen Chapman
Date: 7.19.20
Re: DEIR for Schilling Lodge Project

**Letter
I45**

Thank you for including my input regarding the merits of the Draft Environmental Impact Report (DEIR) for the proposed Tahoe Cross Country Lodge Replacement and Expansion Project (Project).

After careful review, I am in full support of the DEIR’s adequacy because it does a thorough job assessing this Project, its potential impacts and mitigation measures. I am confident in the thoroughness of the DEIR’s study and it is evident that any impacts from the Project can be easily mitigated.

I hope the Project will move forward quickly to better serve our community and visitors with quality and responsible outdoor recreation options on a year-round basis.

As a long-time educator and local resident, I am supportive of the new lodge Project to serve as an important resource, in even a greater capacity, at engaging our youth in the great outdoors. The new Lodge will also better accommodate the existing and projected recreation demands of our community and visitors.

Again, the DEIR is a complete and adequate study and it should be approved in order to move this Project forward to fruition.

Working and raising a family in the Lake Tahoe basin, I am keenly aware of good projects vs. those that need more study and this one is ready to go. Let’s work together to deliver this incredible opportunity!

Thank you for your attention.

Tracy Owen Chapman

Tracy Owen Chapman
775-339-1190

I45-1

Letter I45 Tracy Owen Chapman

July 19, 2020

Response I45-1

The comment includes background information about the letter’s author, summarizes benefits of the proposed Project, expresses support for the proposed Project, and expresses support for the analysis and accuracy of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Gerald Rockwell](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Monday, July 20, 2020 10:26:33 AM

**Letter
I46**

Dear TCPUD Board Members,

I am on the TXC/TCCSEA Board of Directors. I believe this project would easily qualify for negative declaration status. In spite of this, I am very happy we went to the expense of a full EIR. Accent has done a very rigorous and thorough analysis of all potential environmental impacts and provided mitigation measures to negate any potentially significant impacts.

The traffic study is a particular case where the researchers went above and beyond any expected study. The fact that they were conservative (high estimates) in their approach is quite reassuring.

Please accept this EIR so we can move on with repurposing this historic building that will be a wonderful asset to our community.

Sincerely,
Gerald Rockwell

I46-1

Letter I46 Gerald Rockwell
July 20, 2020

Response I46-1

The comment includes background information about the letter's author, expresses support for the proposed Project, and expresses support for the analysis and accuracy of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Douglas Gourlay](#)
To: [Kim Boyd](#)
Subject: Re: Written Comments on TXC DEIR Project for 17 July TCPUD Board Meeting
Date: Monday, July 20, 2020 3:05:00 PM

Letter I47

Excellent - is the same true for the TXC board that is proposing this project? It would be quite horrid optics to find out that any of the TCPUD or TXC board members supporting this project were located near the current site and would be materially benefitting from it being relocated.

I47-1

dg

On Mon, Jul 20, 2020 at 2:41 PM Kim Boyd <kboyd@tcpud.org> wrote:

Mr. Gourlay,

Thank you for your written comments on the Tahoe XC Lodge Replacement and Expansion Project draft EIR. These will be treated as written comments on the draft EIR and will be responded to in writing like all other comments. They will also be provided to the TCPUD Board. As to your broader questions, TCPUD staff offer the following:

- All TCPUD Board members live within the boundaries of the TCPUD and represent all constituents equally.
- If there were any conflicts of interests, they would be announced and disclosed.

Thank you,

Kim Boyd

Senior Management Analyst

Tahoe City Public Utility District

530.580.6286 Direct

530.583.3796 Main Office ext. 386

www.tcpud.org

I47-2



*Building a healthy mountain community through
our passion for public service*

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From: Douglas Gourlay [mailto:douglas.gourlay@gmail.com]
Sent: Friday, July 17, 2020 9:51 AM
To: Terri Viehmann <tviehmann@tcpud.org>; Dan Wilkins <d.wilkins@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; John Pang <jpang@tcpud.org>; Scott Zumwalt <scottrzumwalt@gmail.com>; Gail Scoville <gscoville@tcpud.org>; Kim Boyd <kboyd@tcpud.org>; Matt Homolka <mhomolka@tcpud.org>; Sean Barclay <sbarclay@tcpud.org>
Subject: Re: Written Comments on TXC DEIR Project for 17 July TCPUD Board Meeting

I47-2
cont.

Based on the last, rather erudite, question asked I'd like to ask for a statement from all TCPUD board members and TXC Board Members that verifies there are no conflicts of interest. Specifically, each board member should disclose if they:

Live in proximity to the transit corridors for Site A or Site D

Have any commercial interest - salary, investment, contracting, sub-contracting or any financial benefit from them or a household member that would stem from this project

Have any commercial interest in the property development that replaced the Schilling Lodge or in the removal, maintenance, storage, rehabilitation of the Schilling Lodge

A clear statement from each board member from TXC and TCPUD would go a long way in helping the residents of The Highlands know that this decision is safely in the hands of non-conflicted individuals and that there is no violation of the public trust or self-dealing.

On Fri, Jul 17, 2020 at 12:10 AM Douglas Gourlay <douglas.gourlay@gmail.com> wrote:

To: Tahoe City Public Utilities District Board of Directors

bcc: Counsel and other Highlands Homeowners

The attached document contains my comments and analysis of the proposed TXC lodge expansion. Please read this document at the board meeting for the TCPUD board. Alternatively, I am available to present this in person if that option is available.

Douglas Gourlay

I47-2
cont.

Letter I47 Douglas Gourlay

July 20, 2020

Response I47-1

The comment asks if the Tahoe XC Board has any conflicts of interest related to the Project. The comment expresses the opinion that there would be horrid optics if any of the TCPUD or Tahoe XC Board members would materially benefit from relocation of the Lodge. Conflicts of interest are not an issue that requires analysis or consideration in an EIR under the requirements of CEQA and the State CEQA Guidelines. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I47-2

The comment includes correspondence between the letter's author and Kim Boyd of TCPUD. Ms. Boyd indicates that all TCPUD Board members live within the boundaries of the TCPUD service area and any conflicts of interest would be announced and disclosed. The comment also includes a copy of comments that are included in comment letter I36, above. See responses to comments I36-1 and I36-2.

From: [Tom Lane](#)
To: [Kim Boyd](#)
Subject: Fwd: Delivery Status Notification (Delay)
Date: Monday, July 20, 2020 5:56:39 PM
Attachments: [icon.png](#)

**Letter
148**

Please confirm receipt of this email

----- Forwarded message -----

From: Mail Delivery Subsystem <mailer-daemon@googlemail.com>
Date: Mon, Jul 20, 2020 at 8:22 PM
Subject: Delivery Status Notification (Delay)
To: <alpinesports.lane@gmail.com>



Delivery incomplete

There was a temporary problem delivering your message to **kboyd@tcpud.com**. Gmail will retry for 22 more hours. You'll be notified if the delivery fails permanently.

[LEARN MORE](#)

I48-1

The response was:

The recipient server did not accept our requests to connect. Learn more at <https://support.google.com/mail/answer/7720> [tcpud.com 184.168.131.241: timed out]

----- Forwarded message -----

From: Tom Lane <alpinesports.lane@gmail.com>
To: kboyd@tcpud.com
Cc:
Bcc:
Date: Sat, 18 Jul 2020 19:02:28 -0400
Subject: Fwd: New XC Center
 Please confirm receipt of this email.
 thanks Tom

----- Forwarded message -----
 From: **Tom Lane** <alpinestports.lane@gmail.com>
 Date: Fri, Jul 17, 2020 at 1:34 PM
 Subject: New XC Center
 To: <kboyd@tcpud.com>
 Cc: Valli Murnane <dartmurnane@yahoo.com>

Thankyou PUD board for all your time and effort on this community improvement project.

I am in full support of this effort for a number of reasons:

- 1) Current facility is old and the layout is insufficient (too small)We have out grown the current location
- 2) The new proposed facility will not only serve NT residents but greatly enhance it's visitors experience
- 3) The new location will reduce Parking issues and traffic that plague current residents.
- 4) Expanded Public transportation to the new facility would greatly mitigate the Highland neighborhood's concerns (see Park City Utah) or even Squaw/ Alpine "Mountaineer Ride Service"
- 5) Let's focus on the enhanced facility as a benefit to ALL of our community.

Thank you for listening

Tom and Kristen

Sent from my iPhone

--
 Tom Lane
 Alpine Sports Marketing and Sales
 (530) 412-2648

--
 Tom Lane
 Alpine Sports Marketing and Sales
 (530) 412-2648

I48-1
 cont.

Letter I48 Tom and Kristen Lane

July 20, 2020

Response I48-1

The comment summarizes project benefits and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Huff](#)
To: [Kim Boyd](#)
Cc: [Terri Viehmann](#)
Subject: RESIDENTS QUESTION
Date: Tuesday, July 21, 2020 5:54:14 AM

Letter I49

Good Morning Kim,
 I hope that all is well with you. Yesterday I was asked the following questions that I need you help to answer: (1) How many homes are there in *The Highlands*, and (2) How many of those Highlands home owners were sent the NOA and were invited to comment on the DEIR?

I49-1

Regards,
 Roger

Letter I49 Roger Huff
 July 21, 2020

Response I49-1

The comment asks how many homes are in the Highlands neighborhood and how many of the homeowners in the neighborhood were sent the Notice of Availability (NOA) and invited to comment on the Draft EIR. There are 249 residential accounts for TCPUD in the Highlands neighborhood, all of which were mailed a paper copy NOA. The NOA was also emailed to 157 recipients, some of which are Highlands residents.

Public Comment on the Draft Tahoe Cross Country Lodge Replacement and Expansion

Letter
150

Thank you for providing this opportunity for public comment on the Tahoe XC Lodge Expansion Project proposal. This EIR is a vast document. To address all of the points herein would produce a prohibitively long document. In an effort to make this succinct yet comprehensible, I've noted comments on specific points with original document points in **bold**. This by no means implies that additional points do not exist or are not cause for concern for people who spend most of their living hours in this neighborhood.

150-1

As a general comment, of the two possible projects, the location of Alternative A, the current XC center location, makes most sense and preserves the greatest amount of natural resources. I encourage you to go with Alternative A.

A smaller project, limited to the Schilling Lodge structure only, would be superior to serve both the community and the natural environment. Although the exciting dream of a larger facility to produce star athletes, etc. is "sexy," it is impractical and, given the changing climate, not particularly realistic. It would be terrible to, in hindsight, realize that we destroyed something irreplaceable to build something much less valuable. The donor of the Schilling Lodge did not donate out of a desire for a huge xc facility, either: in fact, the XC ski group was not even the first group offered the structure. Therefore, donor intent is irrelevant to this specific project.

150-2

This project might have been an excellent idea were it proposed 50 years ago, when it could have brought many of the plusses noted in this proposal, with fewer of the negatives. But this is not 1970, it is 2020. Today's reality conflicts with the goals of this project. Traffic is just one of the problems with this proposal.

Today, the residential Polaris Rd. area is already stressed by traffic and activity levels. Residents are challenged by traffic traveling at excessive speed and at various hours (including large vehicles which are by their nature quite loud), as well as evening events that are very audible at the houses on the street. Both pets and children have been struck by vehicles traveling at excessive rates of speed by drivers who never intended to hurt anyone but nonetheless hurt or killed a living resident.

150-3

While residents signed on for dealing with the activities and sounds of the nearby school life, adding a sizeable year 'round recreation business, which must attract as many people as possible in order to survive, will dramatically change daily life for the residents.

Please take this perspective more seriously than it has been taken thus far.

The Highlands neighborhood is a well-established residential area. This proposal is for creating a sizeable outdoor recreational commercial enterprise that will need to operate at maximum capacity and hours to make ends meet. According to the Placer County Land use and permit tables, "Outdoor commercial recreation" operations are not

150-4

allowed in residential areas, nor are “commercial event centers,” and for good reasons. It is an unwise and unwelcome combination. How is this project even being considered?

I50-4
cont.

BACKGROUND AND NEED FOR THE PROJECT

“ . . . advance youth and adult recreation opportunities year-round; provide opportunities for additional special events, community events, and private events. . . “

The current roster of events in this residential neighborhood is already quite full. With school 5 days/week for 9 months/year (3 busy periods each day: morning, lunchtime and dismissal), with associated athletic games and activities, weeknight community recreational athletic competitions in the spring and summer, and weekend tournament events in the summer (not counting informal practices), Polaris Road is quite busy without the addition of a business endeavor in the neighborhood. It has been said that starting Fall 2020, there will be 100 additional students attending the high school alone, which will elevate the traffic levels (and concerns) noticeably.

I50-5

In the past two years, since this proposal has been promoted, the number of people driving to the high school for both XC skiing and mountain biking has increased considerably. Quite a few of these people are in quite a hurry to get there, driving well above the 25 mph speed limit. When asked how they came to enter the trail system from the high school, most have replied that the XC center people suggested it to them.

“Uncertain weather patterns and the poor quality of existing developed facilities stress the financial viability of the TCCSEA operation of the cross-country ski lodge and area.”

Uncertain weather patterns are expected to continue, probably for the lifetime of anyone reading this, and their children and grandchildren. Competently researched data indicates that the overall trend in our area is a warming climate, and not for the first time on our planet. Dr. Charles Goldman is available for consultation on this matter: his 50+ years of research is rather important to this proposal (the TERC staff can help you reach him). One might conclude that a new xc ski facility at our elevation, no matter how attractive an idea it appears, would be a foolish investment, especially when one considers how much forest destruction is required to make it happen.

I50-6

But don’t take my word for it. Consider the conclusions of some of the researchers who have been looking at this for more than 60 years. Just a couple of sources:

The Effects of Climate Change on Lake Tahoe In The 21st Century: Meteorology, Hydrology, Loading And Lake Response

https://tahoe.ucdavis.edu/sites/g/files/dgvnsk4286/files/inline-files/Climate_Change_Report_2010.pdf

Lake Tahoe Climate Change Science Synthesis

https://www.cakex.org/sites/default/files/project/documents/FinalReport_GCC_ScienceSynthesis-1%20Lake%20Tahoe_0_0.pdf

150-6
cont.

PROJECT OBJECTIVES

TCPUD’s Project objectives are to:

“Expand recreational opportunities through construction of a new lodge at Highlands to improve resident and visitor experience.”

This expansion—which isn’t clearly detailed—will not improve the resident experience; it comes at too high a price. Outdoor commercial recreation is not allowed in Placer County residential areas, an appropriate regulation.

150-7

“Construct a new lodge that minimizes effects on the neighborhood.”

We are eager to see a proposal that would minimize effects on the neighborhood. This proposal will not do that.

Beyond the effects and impact of construction, this lodge project will destroy existing mature forest to plop a very large development and parking area in its place and add significant noise and traffic to a currently residential area.

“Create inviting community areas and public-use spaces.”

What brings most visitors (and residents) to our area? The stunning natural beauty: the forests, the lake. Not the developed areas. What is inviting to people? Not the developed areas. You could leave the xc center as is and the trails would be as inviting as they ever will be. We must not lose sight of this fact.

150-8

An improved lodge is a great idea, but not this specific proposal.

TCCSEA’s Project objectives are to:

“Maximize the base elevation of the lodge site.”

The difference in base elevation is not significant enough to warrant such significant alteration of an established residential neighborhood.

150-9

“Improve and maintain educational programs and activities offered to adults and youth and create more userfriendly access to the trail system for beginner, disabled, and senior recreationists.”

The difference in “user friendly access” is not significant enough to warrant such alteration of an established residential neighborhood.

150-10

Also, since the XC center is already advising people to access the trail system through the high school parking lot, that portion of the stated objective is already being met, without the destruction of forest for a large new outdoor recreation commercial complex.

I50-10
cont.

TCPUD and TCCSEA share Project objectives to:

“Remedy inadequate parking and improve access to the lodge and trail system.”

In previous discussions with the late Kevin Murnane, then-Director of the XC ski operation, he asserted that the current XC lodge location had already been given permission to expand the parking in the current location. Therefore, this massive project is not necessary to address this objective.

I50-11

“...facilitate growth and diversity of recreational opportunities by enhancing summer and winter activities.”

This is an attractive sounding sentence with very little clear meaning. Currently, the recreational opportunities take place on an individual basis: people arrive, then go skiing or bicycle riding on the trails. They are here to experience the beautiful forests of the trail system. Nothing people do will enhance this experience, outside of renting skis and bikes.

I50-12

If “growth and diversity of recreational opportunities” means changing the trail system, what are the details?

AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

“The State CEQA Guidelines require an EIR to include a list of areas of potential controversy and issues to be resolved.

Appendix A includes a complete list of comments received during the scoping period. The following are key issues related to the Project:

Potential traffic impacts in the Highlands neighborhood, effects on emergency access and evacuation routes, and effects on school-related traffic . . .”

Polaris Rd. is a cul de sac: there is only one route in and out. This presents a serious problem in an emergency situation, especially fire, as was amply illustrated in the Oakland Hills fire of 1991 and in Paradise in 2018.

I50-13

Traffic, it has been well established, is already a problem: both people and animals have been struck by vehicles along Polaris Rd., and that is at much lower use rates than a large outdoor recreational center business would create.

In effect, Polaris Rd. would go from an already-stressed residential street into a commercial avenue, against the desires of the established residents who bought homes in a residential zoned area. Therefore, it is only reasonable, if this project were to go through, that the homeowners along Polaris Rd. be offered compensation.

“Public safety related to traffic, pedestrian safety, and serving alcohol at the Schilling Lodge . . .”

There are already issues around the high school (please give residents a chance to describe these to you if there is any doubt). Late night festivities often include hollering and sometimes people driving fast down Polaris Rd. Why isn't the sheriff called more often? Because people don't want to cause a ruckus if it can be avoided, and will wait to see if the people will stop their disturbance and leave. Most often they do, but that is after they have awakened residents.

People who have imbibed alcohol can become not just loudly annoying but belligerent as well. Residents have a very strong preference that this situation not be introduced to our residential neighborhood. Everyone likes to feel safe at home. Please don't take that away from us.

The traffic issue is covered in several places. Please note, wild animals, pets and people have all been hit on Polaris by speeding motorists. The motorists didn't intend to hit the people and animals, but it happened. Current law enforcement doesn't have the bandwidth to enforce the speed limit on this road. Establishing an attraction to bring in more people will worsen this situation.

150-14

“Construction of a new lodge on an undeveloped site . . .”

This phrasing is skewed and an inadequate description. Another way to put this would be, “Destruction of existing forest and habitat to construct new lodge.” Most residents value forest preservation above development of nonessential structures.

150-15

“Noise impacts, including from additional special events and potential disruption to the learning environment of the school . . .”

Currently residents contend with noise and traffic impacts from:

- school 5 days/week for 9 months/year (3 busy periods each day: morning, lunchtime and dismissal)
- associated athletic games and activities (Go Lakers!)
- weeknight recreational athletic events
- weekend events
- informal practices

150-16

For those on the northern side of Polaris (away from the lake), several of these weekend events bring enthusiasts into their backyards. These include xc skiers in winter and mountain bikers in summer. It is tolerable a few times a year because we know it's a one-day event. But it would likely become far more frequent with the addition of a 7-days-a-week outdoor recreational business in our residential neighborhood.

“Parking issues, including on-street parking . . .”

Currently, when there is a school event, you will find cars parked all along Polaris between the schools and the Old Mill intersection, sometimes parking across driveways, in their eagerness to get to their destination. A winter weekend would likely bring all this and more, with icy roads, if there were a large outdoor recreational facility in our residential neighborhood.

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150-17
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Section 3.2.1: Aesthetics

Aesthetics are highly subjective, as any public artist can attest. Although this outdoor recreation facility would not affect any “scenic highway” view, it will very much affect the view in the Highlands neighborhood, and forever. The claim that many in the area would have “limited views through the forest of the Schilling Lodge” is plain old silly. The view, especially at night when lights are on, will be more than limited. So is the claim that it would not “degrade the existing visual character or quality of the ... site or their surroundings.” Simply removing the standing forest will degrade the existing visual character AND quality of the site. Residents, students, staff and visitors will have plenty of view of this lodge, especially in the first five years after its construction, as the land tries to heal from the construction. However, if the Schilling Lodge (and not a huge expanded addition) were placed in Alternative A, the current XC ski lodge location, it would be a re-development project, so the visual change would be greatly lessened. Another benefit would be the preservation of existing mature forest.

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Section 3.2.7: Public Services

“The impact on fire protection, emergency response, and police protection services would be less than significant for the proposed Project and Alternative A.”

If you’re planning for the hoped-for, everyday-type situation, this is true. But to be accurate, you *must* plan for the emergency situation, and the impact on all three of these agencies would be significant if there were a fire on a school day.

Given that Polaris Rd. is a cul-de-sac with two schools at its terminus, adding a large outdoor recreation business alongside it would, most days, further congest Polaris Rd. traffic, certainly at lunchtime and after school, if not also in the morning. Add a fire and suddenly first responders are trying to evacuate a school, a business and residents on a cul-de-sac road. This is unnecessary risk.

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150-19
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Section 3.2.8. Recreation

“The proposed Project and Alternative A would increase the number of events that would use the trails in the surrounding area. Special events that use the trail system would temporarily impact parking and trail use because of an increase in participant users, which could interfere with other recreation users that want to

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150-20
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use those trails and potentially reducing the quality of their recreation experience.”

We can safely replace “could” with “will” based on current experience, which includes at times harassment of recreation users by race participants, particularly between bicycle riders and pedestrians. Currently, race participants tend to assume their racecourse is theirs to own and many take exception to coming across walkers/hikers and can be aggressive in their displeasure. Event organizers have room for improvement on this already.

I50-20
cont.

“Neither the proposed Project or Alternative A would affect the fair-share distribution of recreation capacity in the Tahoe Basin because they would continue to provide public access to the cross-country ski area and surrounding trails. Additionally, a larger lodge would be available for public use and for an increase in the types of events yearround. This would be a beneficial impact of the Project.”

I50-21

This is not entirely correct: “continue to provide public access . . .” implies free access but in reality, the XC ski trail system is a pay-per-use operation and all access is by paid admission only. In summer, bicyclists can access the trails for free.

The “beneficial impact” of more events in this residential area is not for the residents, so that is also not entirely correct.

Thank you again for providing the opportunity to give comment on this proposal. And thank you for thinking not just 5 years out, or 10 years out, but 20 years out, with more rain than snow falling at our elevation, and making a decision that will minimize destruction of forest and maximize re-development of already developed areas. That’s good stewardship of our irreplaceable Tahoe basin lands.

I50-22

Regards,

Marguerite Sprague
Polaris Rd. resident

Letter I50 Marguerite Sprague

July 21, 2020

Response I50-1

The comment provides an introduction to the letter. No further response is necessary.

Response I50-2

The comment expresses support for Alternative A. The comment also notes a preference for retaining the size of the original Schilling residence building. The comment expresses the belief that the Schilling Lodge donor did not donate the facility out of a desire for a huge cross-country facility and the Tahoe XC group was not the first group offered the structure. See comment letter I75, which is authored by a member of the Schilling family and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-3

The comment expresses an opinion that traffic is one of the problems with this proposal and that Polaris Road is already stressed by existing traffic and activity levels, traffic traveling at excessive speed, as well as evening events that are very audible at the houses on the street. The comment goes on to state that both pets and children have been struck by vehicles traveling at excessive rates of speed. Additionally, the comment notes that the proposed Project will dramatically change daily life for the residents.

Please see Master Response 1: Transportation Safety. The comment addresses enforcement and social issues rather than specific physical environmental issues and does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-4

The comment asserts that according to the Placer County land use and permit tables "outdoor commercial recreation" and "commercial event centers" are not allowed in residential areas. Given this, the comment asks how the Project could even be considered.

The comment is referring to Section 17.06.050 of the Placer County Code of Ordinances.

As stated in Section 1.03(E) of the Area Plan Implementing Regulations (Placer County and TRPA 2017), "The Placer County Code applies to the area within a conforming Area Plan to the extent that a provision is not in conflict with the TRPA Code of Ordinances or this document." Thus, because the Implementing Regulations apply zoning designations to all areas of Placer County within the jurisdiction of TRPA, including the proposed Project site and Alternative A site, the provisions of the Implementing Regulations supersede the zoning ordinance in the County Code. See Section 2.07(F) of the Area Plan Implementing Regulations, which identify the permissible uses in the North Tahoe High School Subdistrict, which contains the proposed Project site and Alternative A site. Section 21.3.1.E of the TRPA Code describes permissible accessory uses in areas with the recreation designation, which include "related commercial sales and services such as ski shops, pro shops... parking lots, maintenance facilities... employee facilities other than housing... outdoor recreation concessions, bars and restaurants..." Additionally, as further discussed in response to comment I35-6, the proposed Project site and Alternative A site are both zoned for "recreation" use and not "residential." See response to comment I35-6, which addresses the land use and zoning designation on the proposed Project site and Alternative A site.

Response I50-5

The comment refers to a statement related to advancing year-round recreation activities and providing opportunities for additional special events in the "Background and Need for the Project" section in the "Executive Summary" chapter of the Draft EIR. The comment summarizes activities at the school and traffic on Polaris Road. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-6

The comment refers to a statement related to uncertain weather patterns, the poor quality of existing developed facilities, and the financial viability of the TCCSEA operation in the “Background and Need for the Project” section in the “Executive Summary” chapter of the Draft EIR. The comment provides a general statement related to climate change and that a new cross-country ski facility at the elevation in the Highlands neighborhood would not be a good idea. The comment provides two additional sources related to the potential effects of anthropogenic climate change within the Tahoe region. Each report uses data published within the Intergovernmental Panel on Climate Change’s (IPCC’s) Fourth Climate Change Assessment (IPCC 2007), and downscales data to project future climatic conditions within the Tahoe region assuming various emissions scenarios. These reports were submitted as evidence to substantiate the commenter’s assertion that the Project would not be suitable for use in future years. These reports, among others which are included under in Section 3.7.1, “Regulatory Setting,” in Section 3.7, “Greenhouse Gas Emissions and Climate Change,” indicate that due to rising global temperatures, the Tahoe region will experience less snowfall as compared to historical averages, making cross-country skiing a less available recreational activity. While this assertion may be true, the Project would provide additional community benefits that are not limited to snow-related recreational activities. For instance, during the summer months, the Existing Lodge provides (and the proposed Schilling Lodge would continue to provide) educational programs and access to hiking and mountain biking opportunities to visitors. The submission of these reports does not conflict with the evidence cited in Section 3.7, “Greenhouse Gas Emissions and Climate Change,” which details the projected climatic change to California and the Tahoe region in Section 3.7.2, “Environmental Setting.” Thus, these reports are not considered new material that would alter the findings or conclusions of the Draft EIR.

Furthermore, consistent with direction provided by the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (CBIA v. BAAQMD) “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users.” Given this direction from the Court, CEQA does not require that a lead agency evaluate the impact of the environment on the project, rather the project’s impact on its environment, except in cases where the project may exacerbate an existing adverse environmental condition. As discussed in Section 3.7, “Greenhouse Gas Emissions and Climate Change,” the Project would generate unmitigated emissions of GHGs above a net zero threshold; however, implementation of Mitigation Measure 3.7-1 would be sufficient to minimize amortized construction and operational emissions to a net zero level. Thus, the Project would not contribute GHG emissions that could exacerbate the adverse effects of human-caused climate change.

Response I50-7

The comment expresses an opinion that the expanded Lodge would not improve the residents’ experience and notes that outdoor commercial recreation is not allowed in Placer County residential areas. Regarding the comment’s assertion related to allowable uses in residential areas, see response to comment I50-4. Comments received from residents related to their opposition to the Project are acknowledged and included in this Final EIR. In spite of some of the expressed disadvantages of the Project from the residents’ point of view (e.g., traffic), nothing precludes the residents from visiting and using the proposed Schilling Lodge for access to cross-country skiing trails, mountain biking or hiking on the nearby trails, or reserving the facility for meetings or events. The Existing Lodge (i.e., the Highlands Community Center building) would be replaced with a historic building that would be larger, providing more space for these different uses. Arguably, the exterior and interior of the Schilling Lodge would provide an aesthetic improvement over that of the Existing Lodge. Additionally, the Project provides an opportunity to add a historic structure to the Highlands neighborhood. As noted on page 2-7 of the Draft EIR, regarding the Schilling residence, which would become the Schilling Lodge:

It exemplifies the architecture and lifestyle of early Tahoe development in the modern era. The Schilling residence was constructed using local and natural materials as a 4,465-sq. ft., two-story, wood-framed structure... Construction of the proposed Schilling Lodge would retain the character defining features that contribute to its historic character as identified in the Schilling Residence Targeted Historic Structure Report

(Wiss, Janney, Elstner Associates 2015) and in compliance with the standards for the rehabilitation of historic structures included in The Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (National Park Service 2017), which include standards for additions to historic buildings.

The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-8

The comment refers to the Project objective, "Create inviting community areas and public-use spaces," and expresses an opinion regarding what brings most visitors to the Tahoe area, stating that developed areas are not what bring visitors and residents. The comment also states that if the Existing Lodge remained as is, the trails would remain inviting to visitors. The Project does not propose to change the trails associated with Tahoe XC. See response to comment I50-7, that highlights some of the benefits of the Project in the Highlands neighborhood, which would also extend to visitors. Also see response to comment I10-4, which explains the types of community use of the Schilling Lodge that could occur with implementation of the Project. The Project does not detract from the natural beauty of the forests and the lake that draw many visitors to the Tahoe region. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-9

The comment asserts that the difference in the base elevation at the Lodge site is not significant enough to support the need for the Project. See response to comment I35-5 that addresses criticisms of the proposed Project at the proposed location related to the increase in elevation compared to the site of the Existing Lodge. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-10

The comment refers to the Project objective, "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," and asserts that the difference in user-friendly access is not significant enough to support the need for the Project. See response to comment I35-5, which addresses the benefits associated with proximity to user-friendly terrain at the proposed Project site. The comment's opinion does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-11

The comment asserts that a previous director of Tahoe XC had already been given permission to expand the parking in the current location. The comment expresses the opinion that because of this, the Project is not needed to address the Project objective related to parking. While it is true that the applicant could seek approval for and implement parking improvements alone, the applicant is seeking to achieve many objectives that would be met by the proposed Project or Alternative A as described in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-12

The comment refers to the Project objective, "Provide high quality and professionally maintained recreational amenities and facilitate growth and diversity of recreational opportunities by enhancing summer and winter activities," and asks for clarification about what this statement means. This Project objective is an applicant-provided objective. See response to comment I10-4, which describes the opportunities for community use of the Schilling Lodge, including running, skiing, and biking day camps and a small increase in the number of large special events (such as races) that could occur with the proposed Project or Alternative A. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-13

The comment states that the State CEQA Guidelines require an EIR to include a list of areas of potential controversy and issues to be resolved. The comment also expresses concerns related to traffic and public safety.

A list of potential areas of controversy or issues to be resolved are listed on page ES-4 under the "Areas of Known Controversy and Issues to be Resolved" section in the "Executive Summary" chapter of the Draft EIR.

Please see Master Response 1: Transportation Safety. Additionally, as detailed on page 3.5-1 of Section 3.5, "Transportation," of the Draft EIR the potential for the Project to interfere with implementation of an adopted emergency response plan or emergency evacuation plan is discussed in Section 3.2.3, "Hazards and Hazardous Materials."

Regarding the concerns noted in the comment related to excessive traffic associated with implementation of the proposed Project, Impacts 3.5-1 and 3.5-2 in Section 3.5, "Transportation," of the Draft EIR analyze the potential effects of Project-generated traffic within the study area. Finally, the request that homeowners along Polaris Road be compensated for the additional traffic that the proposed Project would generate does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-14

The comment states that late night festivities around the high school often include hollering and sometimes people driving fast down Polaris Road. The comment expresses the opinion that people who have imbibed alcohol can become a nuisance and residents have a very strong preference that this situation is not introduced to the residential neighborhood. The comment goes on to note that wild animals, pets, and people have all been hit on Polaris Road by speeding motorists and that law enforcement does not have the bandwidth to enforce the speed limit on this road and the proposed Project would bring in more people and worsen this situation.

The portion of the comment related to alcohol consumption addresses social issues rather than specific physical environmental issues and does not address the adequacy of the Draft EIR analysis. See response to comment I10-19, which addresses concerns related to the presence of alcohol at the Schilling Lodge. Please see Master Response 1: Transportation Safety for a response related to speeding. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-15

The comment disagrees with the wording of the statement, "construction of a new lodge on an undeveloped site" in the "Executive Summary" chapter under the "Areas of Known Controversy and Issues to be Resolved" section on page ES-4 of the Draft EIR. The comment asserts that another way to phrase this statement would be "destruction of existing forest and habitat to construct new lodge." The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-16

The comment summarizes the types and extent of noise and traffic currently experienced in the neighborhood. The comment asserts that instances of recreation users in the backyards in the neighborhood would occur more frequently than under existing conditions. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-17

The comment states that when there is a school event, you will find cars parked all along Polaris between the schools and the Old Mill Road intersection, sometimes parking across driveways. A winter weekend would likely bring all this and more, with icy roads, if there were a large outdoor recreational facility in our residential neighborhood. See Impact 3.5-4, which addresses the potential for the Project to result in inadequate parking conditions beginning on page 3.5-24 in Section 3.5, "Transportation," in the Draft EIR. This analysis takes into account provisions to minimize the use of residential parking, such as carpooling, that would be incorporated into event planning and implemented

to address parking demand and pursuit of a shared-parking agreement with the Tahoe Truckee Unified School district to allow Tahoe XC and North Tahoe High School to share their respective parking areas during high-use events. The impact analysis concludes implementation of the Project would result in an improvement to existing conditions in the neighborhood as a whole for these reasons and because of the increased size of the parking lot. Parking illegally is prohibited by law, and it is presumed that drivers must obey existing parking regulations and laws or be ticketed. Enforcement of parking regulations and the risk of violating laws is not a topic subject to CEQA review. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-18

The comment asserts that aesthetics are highly subjective. The comment agrees that the Project would not affect any "scenic highway," but asserts that it would affect the view in the Highlands neighborhood. The comment disagrees with statements in Section 3.2.1, "Aesthetics," in the Draft EIR that there would be limited views of the Schilling Lodge through the forest and that it would not degrade the existing visual character or quality of the site or the surroundings. The comment specifically notes concerns related to nighttime views and those related to tree removal. The comment notes that aesthetic impacts at the Alternative A site would be less of a visual change because the Project would consist of redevelopment.

The potential impacts from the proposed Project and Alternative A related to light and glare are assessed on page 3-9 of the Draft EIR. The light and glare impacts would be less than significant because the proposed Project and Alternative A would include lighting that would be downward facing and the minimal necessary for safety purposes, neither would adversely affect day or nighttime views in the area. Additionally, the exterior building materials used for the Schilling Lodge would consist of wood siding and a product that best matches the historic character of the original wood shake roof but meets local fire code requirements, consistent with the materials used in the historic Schilling residence. These materials would not create new sources of glare.

To clarify the analysis of impacts on the visual character or quality of the site as it relates to tree removal for the proposed Project and Alternative A, Section 3.2.1, "Aesthetics," is revised in this Final EIR. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." This clarification does not alter the conclusions with respect to the significance of any environmental impact.

A new paragraph is added after the third paragraph on page 3-7 as follows:

The nearest residence to the proposed Project site is located 370 feet south of the Schilling Lodge and parking lot. The proposed Project would only remove trees within the footprint of the Schilling Lodge, driveway and parking lot, and trees in the surrounding forest (including within the viewing distance between nearby residences and the parking lot) that would provide screening would be retained. The number of trees that could be removed by either the proposed Project or Alternative A are identified in Table 2-2 on page 2-12 in Chapter 2, "Description of the Proposed Project and Alternatives Evaluated in Detail," in the Draft EIR. Figure 2-5 on page 2-17 in Chapter 2 of the Draft EIR shows an aerial photo of the existing forest, adjacent school, and nearby residences along with an overlay of the Schilling Lodge, parking lot, and driveway. As seen in the aerial photo, many trees are located between those facilities included in the proposed Project and the nearest residences. The presence of these trees between the Schilling Lodge facilities and nearby residences would limit and screen views of those facilities. Impacts related specifically to tree removal are detailed under Impact 3.3-2 beginning on page 3.3-17 in Section 3.3, "Biological Resources," of the Draft EIR. Although trees would be removed to construct the proposed Project, nearby residents would continue to have views of the forest that would limit their view of the Schilling Lodge and would retain the visual character of the forested area.

Response I50-19

The comment references the less-than-significant impact conclusion related to fire protection, emergency response, and police protection services under Section 3.2.7, "Public Services," in the Draft EIR and asserts that you must plan for emergency situations and that the impact on these agencies would be significant. The comment notes that conditions along Polaris Road, a cul-de-sac with the schools at the end, residences, and a business would experience unnecessary risk associated with the Project.

As discussed on page 3-13 of the Draft EIR, the location of the Schilling Lodge next to the schools compared to existing conditions with the Existing Lodge located 0.8-mile down the road would essentially result in no change in emergency response times compared to existing conditions. This impact analysis is focused on the impacts related to fire, police, and emergency response services.

The potential for risks related to wildfire and emergency evacuation are addressed on page 3-12 under Section 3.2.3, "Hazards and Hazardous Materials," and on pages 3-15 and 3-16 under Section 3.2.9, "Wildfire." See response to comment I10-7, which addresses concerns related to emergency response and evacuation. See response to comment I10-8, which addresses concerns related to wildfire from the Project.

Response I50-20

The comment refers to a statement in Section 3.2.8, "Recreation," in the Draft EIR related to potential impacts on the quality of recreation experience during special events that use nearby trails. The comment notes that there are times when special event participants do harass recreation users and suggests that event organizers could improve management of the events. As noted on page 3-14 under Section 3.2.8, "Recreation," in the Draft EIR:

Currently, six large special and premier events are held at Tahoe XC each year. The Project proposes a total of nine large special events, an increase of three large special events compared to existing conditions. Although implementation of the proposed Project or Alternative A would result in an increase in the number of trail users participating in the additional special events, this increase would be short-term and temporary, as the Project applicant would limit the number of additional races and the trail races last for only a few hours on a single day. Because the increase in use of trails and the temporary congestion of some trails during special events would be limited and not substantially different than under existing conditions, the proposed Project and Alternative A would not result in a substantial adverse effect on the quality of recreation users in these areas and would not accelerate the physical deterioration of these trails.

As discussed on page 2-13 in Chapter 2 of the Draft EIR, a Management Plan for operating the Schilling Lodge has been drafted by TCCSEA (see Appendix B of the Draft EIR), which includes policies to guide TCCSEA management decisions and operational details for the Schilling Lodge and associated recreation activities. At the time of writing of this Final EIR, the Management Plan has not been finalized. The Management Plan's policies would be included in a future land lease or agreement with TCPUD following construction of the proposed Project. It is possible that additional policies, such as those related to the operation of special events as raised in this comment, could be included in the Management Plan. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-21

The comment disagrees with the statement in the recreation analysis in the Draft EIR that the Project would continue to provide public access to recreation resources. The comment incorrectly assumes that public access implies free access. Use of the Tahoe XC cross-country ski trails is not free, but is available to any member of the public, because the fees are used to maintain the winter trail system and operation of Tahoe XC. The comment also asserts that the beneficial impact of more events in the Highlands neighborhood is not for the residents. Although comments have been received by residents expressing their disapproval of events at the Schilling Lodge, the assertion that residents would not benefit is not entirely true because there is nothing that would preclude residents from participating in any of the special events hosted at the Schilling Lodge and they would be in close proximity to the events allowing them to have easy access if they participated. This comment does not provide any specific evidence that related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I50-22

The comment expresses appreciation for the opportunity to provide comments on the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Donald Fyfe](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Tuesday, July 21, 2020 4:40:25 PM

**Letter
I51**

Hello Kim,

After spending some time reviewing the Draft EIR for the Tahoe Cross Country Lodge Replacement and Expansion project I would like to express my observations.

I was impressed with how thorough the report was, it is quite an impressive document. Also of note, on the rare occasion where the project created an impact that was noted as significant, the mitigation strategies seemed to address the issue, minimizing the impacts.

It appears to me the Full Project proposed is clearly the best way to address all the inadequacies of the current lodge facility outlined in the report.

Thank you for the opportunity to express my thoughts.

Sincerely, Donald Fyfe

I51-1

Letter I51 Donald Fyfe
 July 21, 2020

Response I51-1

The comment expresses support for the proposed Project and expresses support for the analysis and mitigation measures presented in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

July 21, 2020

Tahoe City Public Utility District
Kim Boyd, Senior Management Analyst
PO Box 5249, Tahoe City, CA 96145
Email: kboyd@tcpud.org

Letter
152

Subject: Tahoe XC Draft EIR

Dear Ms. Boyd:

I am writing this letter in support of the preferred option (Site D) for the *Tahoe Cross Country Lodge Replacement and Expansion Project*. The Environmental Impact Review (EIR) fully addresses and mitigates any impacts of this new location and the replacement and expansion project at Site D provides many significant benefits for the community.

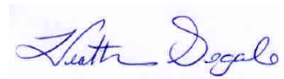
This project location would provide more suitable space to serve the community and allow for easier beginner access. Additionally, the proposed location would provide additional days to weeks of winter access for the community as air temperatures rise and snowpack decreases due to climate change*.

The long-term viability of this recreation resource requires better access to trails for winter use. This location is located at a higher elevation (approximately 100 vertical feet higher elevation) and is also closer to high elevation trails. These slightly higher elevation trails sustain snow longer and this location also avoids three of the four pitches that can close the area in low snow years. As avid Nordic skiers, this amenity is very important to us personally, but also for our community and the economic viability of Tahoe XC.

Traffic impacts related to the lodge are small in comparison to the effects of the high school. The people along Polaris and Old Mill purchased their property knowing they were on the access route to the school. I do not think that Tahoe XC will add measurably to the volume of traffic experienced other than it will expand it from 5 days per week to include weekends.

I hope to see this project move forward and look forward to a new, higher elevation base.

Thank you for your consideration,



Heather and John Segale (Residents of Tahoma since 1996)

*See the UC Davis *State of the Lake* chapter on meteorology available at <https://tahoe.ucdavis.edu/stateofthelake>. Over the last 107 years, daily air temperatures measured at Tahoe City have increased. The long-term trend in average daily minimum temperature has increased by 4.43 °F (2.46 °C). The trend line for the minimum air temperature now exceeds the freezing temperature of water, which is leading to more rain and less snow as well as earlier snowmelt at Lake Tahoe.

Letter I52 Heather and John Segale

July 21, 2020

Response I52-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, expresses support for Site D of the proposed Project, and expresses support for the analysis in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I52-2

The comment asserts that traffic impacts related to the Schilling Lodge are small in comparison to the effects of the high school and expresses the opinion that the traffic associated with the proposed Project would not measurably add to the volume of traffic experienced under existing conditions. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Robert Duffield](#)
To: [Kim Boyd](#); [Robert Duffield](#)
Subject: Tahoe Cross-Country Lodge Replacement and Expansion Project EIR Comments
Date: Tuesday, July 21, 2020 9:31:12 PM

Letter I53

Hello Kim Boyd,

Thank you for the opportunity to comment on the Tahoe Cross-Country Lodge Replacement and Expansion Project EIR. The following email is to be considered official comment to the public review of the Tahoe Cross-Country Lodge Replacement and Expansion Project EIR.

My name is Robert Duffield. I am very familiar with the current operators of the Tahoe Cross Country Ski Area, the TCCSEA, and the current base lodge facility and trail system. The reason I am so familiar is two fold. In addition to being a year round user of the facility, I was an employee of the TCPUD Department of Parks and Recreation for 20 years and more specifically, the Director of the Parks and Recreation Department during the time period the TCCSEA came into being and began their partnership with the TCPUD to operate the ski area. I directed the consultant recruitment and hiring to perform the Lakeview Cross Country Ski Area Assessment Report in 1999. This report has been used by the TCPUD and TCCSEA as a master planning guide for the operation and expansion of the facility.

I53-1

As an additional background, I am familiar with the Schilling estate having had the opportunity to visit the estate numerous times while it was in the Schilling family ownership. It truly exemplifies the "Old Tahoe" design and construction attributes that are forever "Classic". The availability to convert this residence into a community facility is a great and unique opportunity to keep the historic heritage alive and to meld it with improvements that would provide a wonderful home for year round recreational opportunities in the North Tahoe Region.

The following are my comments on the project EIR. I have attempted to keep them brief and to the point. Should additional comment or clarification be needed I would be happy to provide that in a separate document.

I53-2

1. The Proposed Project and Alternative A look to address the short term and long term operational needs of the facility. The facility area assessment report conducted by Nordic Group International in 1999, identified many shortcomings of the current lodge configuration, location, and day to day operations. Recommendations were made to address these. Many of these recommendations are incorporated in the Proposed Project by the TCCSEA.
2. The Project EIR in my opinion is thorough and complete. Within the document the specific areas of environmental impacts have been identified and where impacts found, appropriate mitigation actions recommended. The conclusion seems apparent that either option, the Proposed Project or Alternative A could be built and any issues mitigated to satisfy the environmental issues and the neighborhood concerns. With that being said, in my opinion the Proposed Project is the preferable alternative for several reasons. These reasons are supported in the EIR. Some of these reasons are:
 - o The stated issue of the logistics of having a steep grade change at the current location that every skier/biker needs to climb to get to more favorable terrain for all ability levels is an issue. The Proposed Project alleviates this issue by having users start on the upper level.

I53-3

- The current location has a lower elevation and more sun exposure. This is a challenge to keep the snow in the winter and with everyone starting out there, this is an issue. The extended winter season or low snow season operation that would be realized at the Proposed Project site will enhance the experience of users as well as increase the number of users over the course of the season thus making the operation much more viable.
- The water supply to be provided by the TCPUD is more viable at the Proposed Project location. As stated in the EIR, there could be issues providing mandated water flow at the Alternative A site.
- The proximity to the HighSchool of the Proposed Project is a major consideration. This is at the end of the street and on busy weekends the shared parking would be a great amenity. Also, the High School is currently used for other Recreation activities such as adult sports leagues and special events, it would be natural to include the Schilling Lodge there. Certainly the high school ski teams would have better access to the ski trails and the use of the ski waxing and training facilities at the lodge would be a great benefit.
- After review of the EIR, it appears to me that the Proposed Project would have a more distant affect on the surrounding residents. Alternative A would have the lodge and parking much closer to existing resident housing.
- Selection of the Proposed Project site allows for the current Highlands Community Center to remain a public asset to the community. With the growth of full time residents being noted over the last while, the need for community facilities will grow and this asset can be used in addition to the Schilling lodge to provide opportunities for the community.

I53-3
cont.

In summary, I am in support of the Proposed Project site of the Tahoe Cross Country Lodge replacement and Expansion Project. The EIR identifies the potential environmental issues and recommendations are provided on how to mitigate them. It is important these issues be addressed. The TCCSEA has proven over the last 20 plus years that they are a community driven organization that is here to stay. They have provided enduring, responsible operation of the Tahoe Cross Country Ski area and have expanded operations to include viable shoulder season and summer activities to the community. There is no doubt the community supports the TCCSEA and the recreation opportunities they have brought forward. It is time to take the next step and make their operation truly world class with the implementation of the Lodge Replacement and Expansion project. The Schilling Lodge will provide the space and atmosphere needed to be a real jewel. The Schilling Lodge will bring historical preservation to the forefront of North Tahoe where it is desperately needed. I look forward to the TCPUD Board voting to allow the TCCSEA to move forward with this project on the Proposed Project site .

As stated I am happy to respond to any questions. My contact information is: Phone: (530) 400-3676; Email: reduffield51@gmail.com.

Kind Regards;
Robert (Bob) Duffield

Letter I53 Robert (Bob) Duffield

July 21, 2020

Response I53-1

The comment provide an introduction to the letter and background about the letter author's experience as a former employee and director of TCPUD Department of Parks and Recreation, involvement in preparation of the Lakeview Cross-Country Ski Area Assessment Report used by TCPUD and TCCSEA in planning for operation and expansion of the Tahoe XC facility, and experiences he had visiting the Schilling residence at its original location. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I53-2

The comment notes that the proposed Project and Alternative look to address short-term and long-term operational needs of the facility and many of the recommendations provided by Nordic Group International in 1999 were incorporated into the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I53-3

The comment expresses the opinion that the Draft EIR is thorough and complete. The comment notes that appropriate mitigation is recommended where impacts were found. The comment also notes that either the proposed Project or Alternative A could be built but the comment expresses support for the proposed Project for a number of reasons, such as accessibility to more user-friendly terrain, less sun exposure, better water supply, potential for shared parking at the high school, and need for community facilities among other reasons. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [kevin.allbi.beer](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Tuesday, July 21, 2020 11:54:56 PM

Letter
I54

Hello Kim and other TCPUD staff. I am writing to voice my strong support for the Tahoe Cross-Country Lodge Replacement and Expansion Project Draft EIR. I find that the overall DEIR is adequate under CEQA and that the relatively minor impacts of new construction can be fully mitigated. Additionally, the new lodge will offer very high value to the community, and especially youth, given its proximity to the high school and middle school. For these reasons and many others, I urge you to vote to approve the DEIR.

I54-1

Thank you,
Kevin Drake

Placer County Lay Representative
TRPA Advisory Planning Commission

and

Local business owner

Letter I54 Kevin Drake
July 21, 2020

Response I54-1

The comment expresses support for the proposed Project and the analysis and accuracy of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Dan Haas

PO Box 1433 Tahoe City, Ca 96145

Letter
155

July 18, 2020

Kim Boyd
Tahoe City Pubic Utility District
PO Box 5249
Tahoe City, Ca 96145
kboyd@tcpud.org

Dear Kim,

As a resident of Tahoe City and a frequent user of the Tahoe Cross -Country Ski Area both for skate skiing and for mountain biking I fully support the relocation of the main lodge and the repurposing of the historic Schilling Lodge as a base of operations (Site D- Full Project).

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155-1
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The ski area is a community benefit but community benefits should not come at the cost of the environment or have substantial impacts on the surrounding community. I do not see any significant and unavoidable impacts related to this project. Even better, any potentially significant impact can be mitigated to a less than significant level.

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155-2
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I understand that there are concerns from the community, especially from residents of the Highlands neighborhood, surrounding this project. The biggest concerns I have heard have to do with the potential traffic impacts in the surrounding neighborhood, specifically impacts to school traffic and emergency/evacuation routes. I believe the dEIR thoroughly studied these concerns and found the potential impact to be less than significant.

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The new location offers better access to beginner terrain, a higher elevation for a longer season, and better access for student athletes. The Schilling Lodge will present an improved experience for staff and customers and provide an additional meeting space for the community.

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Best regards,



Dan Haas

Letter I55 Dan Haas

July 22, 2020

Response I55-1

The comment expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I55-2

The comment notes that they did not see any significant and unavoidable impacts from the Project and any potentially significant impact can be mitigated to a less-than-significant level. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I55-3

The comment acknowledges concerns expressed by the community related to potential traffic impacts in the neighborhood, specifically related to school traffic and emergency access and evacuation routes. The comment expresses the belief that the Draft EIR thoroughly analyzed these concerns and concluded potential impacts would be less than significant. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I55-4

The comment states the new location offers better access to beginner terrain, a higher elevation for a longer season, better access for student athletes, an improved experience for staff and customers, and additional meeting space for the community. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Tahoe City Public Utility District
Kim Boyd, Senior Management Analyst

Letter
I56

A wonderful and very worthwhile endeavor is taking place in our community. The Tahoe Cross Country Ski Area and its amazing group of volunteers, have been working very diligently to bring a fabulous new base facility with the iconic Schilling Lodge to this local/community ski area. This is an incredible improvement for the Tahoe Cross Country Ski Area.

This new base facility and Schilling Lodge will improve TCCSA beyond any scale or metric imaginable.

- More than double the parking with 100 proposed parking spaces, compared to 46 at the current site. No more street parking on weekends or weekdays.
- Overflow parking for special events like The Great Ski Race and more. There is adjacent overflow parking at North Tahoe High School.
- The Schilling lodge allows for larger retail, ski rental and ski maintenance areas.
- Increased food service and lounge areas for guests.
- The lodge has space for a real team room for our frequent state champions, The North Tahoe High School Nordic Ski Team. Currently they have a team room, not much bigger than a closet.
- The new base facility's location is best suited for the TCCSA. The lodge is immediately adjacent to the beginner terrain. How many first time and beginner skiers have never come back to this ski area because of the unfriendly, steep, and often icy hill that accesses the beginner terrain? Beginners will be greeted with the area's large, flat and easiest terrain right out the door. The chances of having a fun and enjoyable learning experience, for these skiers, couldn't be better.
- The Schilling Lodge that will be reconstructed on the new site, was originally built in 1936. There is plenty of history and Old Tahoe magnificence that comes with this house being converted to the Ski Lodge. What a great use and donation to the Tahoe Cross Country Ski Area and our community. We and our visitors will now see, breathe and feel the history that the Schilling Lodge provides.

I56-1

Thank you to all the Tahoe Cross Country Ski Area volunteers. Your tireless work is appreciated and a gift to all of us.

John and Leslie Hyché

Letter I56 John and Leslie Hyché
July 22, 2020

Response I56-1

The comment expresses support for the proposed Project and lists components of the proposed Project and the associated benefits. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Genevieve Evans](#)
To: [Kim Boyd](#)
Subject: Tahoe XC DEIR
Date: Wednesday, July 22, 2020 6:50:47 PM

**Letter
I57**

Ms. Boyd-

I would like to express my support for the Schilling Lodge Tahoe XC project at the preferred site near the high school. I am a relatively new Tahoe XC Board member, although I have been skiing at Tahoe XC since 2004. I have read the DEIR and feel that it has more than adequately addressed all issues.

The following are what I see as the greatest benefits of the project to the community:

- The primary reason Tahoe XC is more appealing to many than Tahoe Donner XC (I believe) is that we have a close community feel. What a better way to improve upon that sense but repurpose an old Tahoe home as a gathering place for XC skiers!

- Locating the lodge near the high school will alleviate parking shortages on weekends and for special events, provide better access to beginner terrain and perhaps even give us a few more ski days a year.

I understand that residents living on Polaris will see an increase in traffic on weekends. However, this seems like a relatively small increase. Additionally, much of the traffic increase could be due to the fact that the word is out: Tahoe is the place to be!

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I57-1

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I57-2

Thank you,

Genevieve Evans

Letter I57 Genevieve Evans

July 22, 2020

Response I57-1

The comment expresses support for the proposed Project, provides background about the letter’s author as a new member of the Tahoe XC Board, and believes the Draft EIR adequately addresses all issues. The comment also identifies benefits of the Project that include the close community feel and potential for shared parking with the high school. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I57-2

The comment expresses understanding that residents living on Polaris Road would see an increase in traffic on weekends but believes this seems like a relatively small increase and asserts that much of the traffic increases could be due to Tahoe’s popularity as a travel destination. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Mike Schwartz](#)
To: [Kim Boyd](#); [Huff](#); [Terri Viehmann](#)
Subject: Quit trying to force Nordic Center move
Date: Wednesday, July 22, 2020 11:32:26 PM

Letter I58

I don't get why you guys are forcing a future of hard feelings and increased hassle and danger on Polaris Rd. I've complained before but here is my last plea for TCPUD to just cut ties with this stupid project. Spend your money on something else. How about making the access road you should have at the beginning, that links the current nordic center building with hwy 28 near the bike path. It works, go look already!!!! Put the silly old schilling lodge on the hill in the current parking lot if for some reason you MUST use it. Make some stairs to climb the 200 vertical feet to the meadow. That's it. Separate these two daily crowds of people between the school and skiing.

Constructing this building at the highschool benefits about 20 fancy pants nordic skiers who of course would like a new building and parking lot. Which you can give them at the existing site. You know all the problems a move to Polaris will create, we keep telling you. It's almost like none of you live here. I hear the TC nordic board doesn't live here. They are the most selfish people forcing this to happen. You don't need to make more money in a residential neighborhood. Skiing is an outside thing. Just modernize what you have and look into a real hwy 28 access road. Sending a ton more people down to the highschool in addition to the speeding kids and sports teams every day is insane. For what? The kids don't need it, the skiers don't need it, and the people who want to go inside to enjoy a coffee can do so in the revised current building. You don't build huge projects in residential neighborhoods to begin with. Especially on a crowded dead end narrow road. What is wrong with you guys? I live on Polaris and wouldn't dream of driving up or down Old Mill with any snow. Now you are going to ADD 100 people per day in a hurry to ski when there is new snow. The kids drive so damn fast every day going to school and sports. It's a constant rush hour twice a day, 7 days a week.

I58-1

I58-2

I58-3

I for one will have no respect for the nordic center management or TCPUD if they force this project. Every negative aspect that has been voiced in the impact reports and community comments seems to just go in one of your ears and out the other. What is up with that? Are you just discounting the locals' knowledge of this bad situation because you are used to ignoring the NIMBA aspect of every project? This is not an issue like that. We all use the nordic trails. We know what we need and don't need. Snow isn't deeper at the highschool. Ask any local xc skier on Polaris. We don't need to provide some high end building to nurture bay area ski team kids. And we sure as hell don't need a property that needs to be rented out for parties to pay the property expenses.

I58-4

Mike Schwartz
The Backcountry
mike@thebackcountry.net
shipping - 11400 Donner Pass Rd. Truckee CA 96161
bill to - PO Box 6706 Tahoe City CA 96145
 cell 530-362-0020
Truckee Store: (530) 582-0909
Squaw Store: (530) 581-4707

Letter I58 Mike Schwartz

July 22, 2020

Response I58-1

The comment expresses opposition to the proposed Project. The comment suggests spending the money for the Project on other things, suggests making an access road that links the Existing Lodge with SR 28, expresses the belief that the proposed Project would create problems, and suggests modernizing what already exists. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I58-2

The comment expresses opposition to building the proposed Project in a residential neighborhood. See response to comment I35-6, which addresses the land use and zoning designation on the proposed Project site and Alternative A site. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I58-3

The comment states that huge projects should not be built in residential neighborhoods, especially on a crowded dead-end narrow road. The commenter states that they live on Polaris Road and would not dream of driving up or down Old Mill Road with any snow and that the Project would add 100 people per day in a hurry to ski when there is new snow. The commenter concludes by stating that the kids drive very fast every day going to school and sports 7 days a week.

See Master Response 1: Transportation Safety for discussion of transportation safety-related concerns related to winter conditions along Old Mill Road. The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I58-4

The expresses the opinion that the Project is not needed. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Huff](#)
To: [Kim Boyd](#); [Dan Wilkins](#); [John Pang](#); [Scott Zumwalt](#); [Gail Scoville](#); [Terri Viehmann](#)
Cc: [Sean Barclay](#)
Subject: TAHOE XC DRAFT EIR
Date: Thursday, July 23, 2020 6:16:09 AM

Letter I59

Dear Board Members,

Correspondence shows at least three different members of the community were told answers to their questions on various subjects (e.g., funding plans, economic feasibility study) would be in the DEIR; but this did not happen. Please provide answers to these important questions now.

Thank you,
Roger

I59-1

Letter I59 Roger Huff

July 23, 2020

Response I59-1

The comment states that correspondence indicates that answers to questions related to a funding plan and economic feasibility study posed by members of the community would be in the Draft EIR. The financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Joy M. Doyle](#)
To: [Kim Boyd](#)
Cc: [Debbie Kelly-Hogan](#)
Subject: Tahoe XC Draft EIR
Date: Thursday, July 23, 2020 3:00:14 PM

Letter
I60

Kim,

I am writing to offer my support of the Tahoe Cross County Center Lodge Replacement and Expansion Project.

I am a 30-year Carnelian Bay resident. Sadly, because I worked full-time and raised two children here, I had limited time to spend at Tahoe Cross County. Last year, however, because I started working part time from home and my kids are off on their own, I purchased a Tahoe Cross Country pass. I visited the center ~15 times and enjoyed it immensely. Not only was the facility properly maintained and operated, I was amazed how much it was used and enjoyed by residents and visitors alike. I vowed to own and use a Tahoe Cross Country pass forever into the future, as long as my health, fitness level and finances allow as I want to support this vital amenity of our community.

I have concluded that Tahoe XC is the heart and soul of the North Lake Tahoe community. It is a social hub and physical outlet unlike any other and provides an unparalleled experience and opportunity that is accessible and enjoyed by all ages and abilities, who visit and participate in cross country skiing and snowshoeing.

No other venue can match Tahoe Cross Country Center - it is vital to our community. We need to invest in the lodge so generation after generation can use and enjoy the facility.

I fully support and encourage Tahoe City PUD to make improvements and upgrades to the lodge because it is a precious community asset. I believe the scope of the draft EIR is complete and adequate for the project and serves the public's interest well. Conclusions in the draft EIR are well founded and any potentially significant impacts are addressed and mitigated in the report.

In closing, please accept my support.

Respectfully,

Joy M. Doyle
 530-386-3657 (mobile)
 530-581-1245 (office | home)
tahoejoy660@gmail.com

I60-1

Letter I60 Joy M. Doyle
 July 23, 2020

Response I60-1

The comment includes background information about the letter’s author, expresses support for the proposed Project, and expresses support for the analysis and accuracy of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Lin Winetrub](#)
To: [Kim Boyd](#)
Subject: TXC draft EIR
Date: Thursday, July 23, 2020 3:59:41 PM

**Letter
I61**

We are in support of TXC being moved to site D.

As nordic skiers since the 70's when Skip ran the area, and then as employees when Kevin and Valli were the managers, we believe in the value of a community gathering spot offering year round recreational services. As its already been stated, TXC needs more parking, improved layout for better flow, much more efficient storage, staff rooms, enhanced community spaces, and better starting place with more snow.

- 1) There is not sufficient parking for employees and visitors during high season ski days, holidays, and weekends, mostly during the months of February & January..
- 2) Supplies are spread out all over the place, with sleds taking up cafe space, Ski equipment in the rental shop and the storage shed, and an outdoor closet, plus more office supplies, cafe supplies, retail supplies in the attic. Very, Very Very inefficient.
- 3) On busy days, we are exploding at the seams, in all departments, Front Desk check in, retail, rental shop and cafe. It would be so amazing to offer guests a more inviting cafe and comfortable indoor public lounge, a more efficient rental experience, plus an employee lounge for breaks. When it is busy we are climbing over benches and bumping into each other just to service customers.
- 4) TXC works because we have a great set of employees & volunteers. Yet often it is a huge challenge to provide the service we desire with the space we currently have. Our popularity means we are working in an organized chaotic fashion
- 5) Providing recreation in winter for families, individuals, seniors, dog owners disabled skiers, is truly a tremendous undertaking for such a small area. Keeping all these folks happy and being able to fulfill their expectations for a great outdoor exercise experience is no small feat. We could provide so much more with more parking and a larger building.
- 6) Now here's the biggie. We need a flatter, larger, easier beginner area! Lessons for beginners are encouraged and highly recommended for safety and knowledge and new skills.
- 7) It is true that a number of residents do not ski at TXC. It is also true that a number of residents ski or snowshoe our groomed trails w/o paying for a trail pass. Who is benefiting by using our trails and who is being taken for granted?
- 8) We wish to see the recreation experience improve for all: Residents, employees, volunteers, and skiers. Seems like we could work together to achieve this. We all live here to enjoy the seasons and mother nature.

We hope that with the positive results from the EIR and that most residents support the new site that it will be approved. Many years of happy skiing for all.

Rick Wertheim and Lin Winetrub

I61-1

Letter I61 Rick Wertheim and Lin Winetrub

July 23, 2020

Response I61-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, expresses support for Site D for the proposed Project, and expresses support for the analysis and accuracy of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Renee Kojane](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Thursday, July 23, 2020 5:39:24 PM

Letter I62

Hi there Kim,

It's Renee Kojane contacting you regarding my support of the Schilling Lodge Project. I am the newest board member of Tahoe XC and agreed to join because it has been one of the healthiest, happiest places in Tahoe for our family. And it's become even more so during this pandemic. I joined the board about a year ago hoping I can help return some of the goodwill this place has offered us. I have all along felt that the Schilling project will serve as a much needed community space where people can gather, relax and connect. We are in need of that more than ever. Tahoe XC is a special spot and warrants a proper lodge that will give a sense of place and will assuredly enhance one of the most loved locations on the North Shore of Lake Tahoe.

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I62-1
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Thank you for everything.

~Renee Kojane
www.reneekojaneart.com

Letter I62 Renee Kojane
 July 23, 2020

Response I62-1

The comment includes background information about the letter's author and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Schroepfer Scott](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Thursday, July 23, 2020 10:17:45 PM

Letter
I63

It looked to me to be a thorough assessment of the consequences of moving TXC up the road.
Let this process continue.

I63-1

Scott Schroepfer
schroepfer.tahoe@gmail.com

Letter I63 Scott Schroepfer

July 23, 2020

Response I63-1

The comment expresses support for the proposed Project and the analysis of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

To: TCPUD Board of Directors
 TXC Schilling Lodge Project response to DEIR report
 23rd July 2020
 Written by Debbie White

Letter
I64

 We are 6 years on from the start of this process and it is pitiful that the donation of this lodge is all about a donor whose sole purpose was to get a tax write off and build the new lakefront more appropriate to this day and age. The upshot is a dilemma of what to do with it.

We are not in favour of the relocation of this Lodge to Site D (Polaris) as proposed. We have supported all along a modified site A (current location) version that includes the Schilling Lodge.

The DEIR doesn't appear to include the Alternative Site A option to replace the Highlands Community Center with the original, historic Schilling Lodge with minimal modifications required to improve the existing site. This is the sensible option that should have been investigated as extensively as Project Site D. Why hasn't it been?

Key issues related to the project:

Environmental impact

The removal of trees in order to facilitate the Schilling Lodge impacts both sites. 183 trees at Site D versus 79 at Site A. Both have environmental impact yet under the Mitigation Measure 3.3-2: Minimize Tree Removal, Develop and Implement a Tree Removal and Management Plan, the mitigation level for Site D could typically include realignment and re-configuration of parking and a reduction in parking requirements, which if implemented, totally negates one of the main criteria for a new site. It is not worth the cost to desecrate the forest and create disruption to flora and fauna that will never recover. We understand change and development, progress and evolution but the thought of long-established plant and animal species being ripped up and torn apart is unthinkable and wrong. For example, Owls might not be seen but they are heard in the neighbourhood and without the trees, they have no habitat.

Potential traffic impacts

Impact 3.5-2: Cause Traffic Volumes on a Residential Roadway; how can you say that the proposed Project (Site D) would not alter travel patterns or increase traffic volumes to the extent proposed Project and Alternative A would not alter travel patterns or increase traffic volumes to the extent that the capacity of a residential roadway would be exceeded? Of course they would be exceeded given the very nature of the location of Site D and the intention of the facility; to create business and therefore traffic to and from the location. Placer County may have a 2,500 vehicles per day standard for residential roadways, but Polaris is not a standard road. It is a dead end, no through road so the capacity of Polaris is not adequate to meet 'standard' norms. The concept of capacity in this scenario is very important and the

I64-1

I64-2

I64-3

road in question (Polaris) should be adequate to serve the needs of the projected traffic. As we have the presence of a school at one end of Polaris, it is well documented that volume of traffic is already at capacity during peak times therefore the addition of another commercial facility at the same end of the street will only increase traffic flow and usage of said street. With no sidewalks that help maintain traffic flow, the flow and therefore volume of traffic are even more compromised.

I64-3
cont.

Parking issues

Impact 3.5-4: Potential to Result in Inadequate Parking Conditions.

Parking has always been an argument to move the existing TXC Site A to Project Site D yet when I asked TXC in a presentation back in 2018 how many parking spaces they had at existing Site A, they couldn't tell me. An embarrassing and foolish error at best when being used as a tool for a case. However, I had counted them the day before and astonishingly, site D offers very few additional spaces to existing Site A. This is not a robust reason to change sites.

I64-4

Events such as weddings will no doubt exceed the 100 spaces planned for Project Site D and therefore further impact the neighbourhood as a whole so you are wrong thinking this alternative would work. It won't work without significant impact to residents.

If 10 of the 100 spaces at Project Site D have to be allocated to Level 2 electric vehicle charging stations (as it states a minimum of 10% of the parking spaces for the project), this reduces regular parking to 90 spaces, further reducing available parking that is no improvement on existing site A's parking. It is senseless to consider Project Site D when there is very little gain.

Impact 3.5-5: Construction-Related Impacts on Traffic; construction on Project Site D will require restriction of use of Polaris that you state could result in detours and lane closures. There is no possibility of detours on Polairs. Lane closures will have a momentous impact on the already hindered narrow street and traffic flow on Polaris.

I64-5

You also mention a mitigation measure that includes a shuttle bus program but where are the cars going to park for a shuttle bus to pick up and drop off? I don't understand how this is a feasible solution.

I64-6

There are clear safety risks with increased traffic at Site D that need to be addressed. Polaris road has no sidewalks and is not lit, so an uptick in traffic volumes will clearly compromise pedestrian, resident, and neighbourhood safety. This has not been specifically addressed in the DEIR. The word safety doesn't appear.

I64-7

In point 3.7 (Greenhouse Gas Emissions) you state the impact of up to 4 years, so are you suggesting the build would take 4 years, resulting in 4 years of disruption to road usage, neighbourhood noise etc....? 4 years of 8 am to 6.30 pm, daily as stated in 3.8 Noise.

I64-8

3.7-1 Greenhouse Gas Emission and climate change

You list one way to mitigate this is by installing rooftop solar panels. But these are a much more expensive way of increasing renewable energy on the grid. The big problem with the California Energy Commission’s new mandate (passed May 9th 2018 and came in to affect this year) is cost. It is a feel-good change that is a questionable public policy and, in this instance, it will add significant cost to the building of the Schilling Lodge and associated buildings.

I64-8
cont.

But the problem is without reducing this, global warming will only get worse and this in turn will affect snowpack in the winter months.

Please note; solar panels don’t work with snow load. Solar panels need sunlight to produce power, so if they are covered in snow, they will not generate electricity. Even if they are tilted at an angle, snow will take time to slide off and this will dramatically hinder the generation of electricity.

3.8-1; Construction noise. Daily construction times over a 4-year period will dramatically impact the comfort and living conditions for the local community. You state by limiting construction times (to those above) will comply with TRPA required conditions and therefore, existing sensitive receptors would not be substantially affected by construction noise and Project Site D should have less than significant impact related to increases in noise. Are you all mad? Sensitive receptors include, but are not limited to, hospitals, schools, day-care facilities, elderly housing and convalescent facilities. So, this doesn’t even include housing, which is exactly what is present in the Highlands. It is a residential neighbourhood with a school so rest assured, residents will be adversely affected by construction noise.

I64-9

3.8-2; Construction vibration. Once again you fail to mention impact on residential buildings. ‘Less sensitive times of the day’ is cited as a mitigating measure but such a time doesn’t exist in a neighbourhood of full-time residents who live and work at home. Without doubt, construction site vibration will have a tangible negative impact on the neighbourhood quality of life.

Construction vibration can have an adverse effect on homes. Polaris is a populated area and would be very close to vibration sensitive construction site. Construction vibrations are a known nuisance and can damage existing structures, such as homes at Project Site D. The early phase of this construction project will generate vibrations in the near-surface soils, adjacent to homes when;

I64-10

- Site clearing and removal
- Site grading and soil compaction
- Installing deep foundations

Vibrations will travel through the ground and transmit through the foundation to the walls, floor and roof of nearby housing. The first signs of vibration related damage will appear on the interior planes of vertical load bearing walls, as these wall resist the lateral swaying and movement caused by vibrations. Almost all finish materials are rigid and inflexible in nature; examples include cementitious stucco, interior plaster, interior gypsum wallboard, and wall tiles. Damage to rigid finishes would first appear as cracks at the weakest locations in the wall first, which is generally at the corners of window and door openings. The building components can vary from

flexible, such as wood and steel, to rigid, such as masonry and concrete. These components are then typically covered with decorative and cosmetic finishes. Damage resulting from vibrations will affect flexible components at connections, which are the most rigid portions of a flexible assembly. Conversely, damage to rigid components will appear as cracks or postconstruction differential settlement. Rigid components will generally be affected by vibrational forces before flexible components.

I64-10
cont.

So, you should be considering the mitigation measures if this occurs to private homes. As a proactive means to mitigate vibration damage claims, nearby buildings should be inspected prior to and after construction and monitored during construction. A pre-construction survey should document the condition of homes closest to Project Site D and likely to be the most impacted by this.

Can you please confirm that TCPUD will be prepared to a) pay for the pre-construction surveys and b) compensate homeowners in the event of vibration damage to homes?

3.8-3 Operational Event Noise: 55 decibels are the maximum noise level allowance according to your document and in line with Area Plan noise standards. A refrigerator runs at 55 dBA so it is good to see this will be controlled as if a fridge is a comparison, operational noise will be very quiet.

However, seeing the use of amplified sound will be required and as you say, will impact sensitive receptors that must include housing on this list. Amplified sound is defined as not exceeding 71 decibels, which is less than a vacuum cleaner (that is 75 dBA), which I don't believe will be possible. They will no doubt be louder than a vacuum cleaner in order to be heard. Housing DIRECTLY faces Project Site D so will be badly affected all day, every day. This is likely to include into the night with weddings and private events being part of the grandiose plans. This is not acceptable and the suggestion of placing amplified speakers facing away from sensitive land uses (i.e.. Homes on Polaris) **will not** in any way, shape or form mitigate this issue. Sound travels and the fact the structure will be close to homes on Polaris, facing speakers away from homes will not abate noise pollution that adversely affects lives in this populated area.

I64-11

Noise is one of the most pressing issues in this entire process. Noise pollution seriously affects lives. Exposure to noise can cause high blood pressure, heart disease, sleep disturbances and stress. It can affect all ages groups especially children. Children who are exposed to noise have been found to suffer from stress and other issues such as impairments in memory, attention level and reading skill. It also impacts the health and wellbeing of wildlife. Animals use sound for a number of reasons, including to navigate, find food, attract mates and avoid predators. Constant noise pollution makes it difficult for them to accomplish these tasks, which ultimately affects their ability to survive.

The pleasure of XC skiing is peace & quiet and the great outdoors with no lifts required and minimal impact on the environment. You need a pair of ski boots, poles

and boots and of course snow. Yet everything you are proposing for Site D does exactly the opposite and negates the very essence of the spirit of the sport.

I64-11
cont.

Operational needs; I can't see a direct section relating to this, but we wanted to highlight the fact the lower elevation of existing Site A versus Project Site D Polaris is 76ft. The argument that flatter terrain to start your Cross Country exercise is ludicrous as XC skiing is all about exercise and it could be argued that the higher elevation is much more exposed to sunshine therefore snow quality is likely to be diminished.

I64-12

Global warming is driving significant changes in our winters and with continued greenhouse gas emissions, temperatures are set to increase. The consideration of Site D as an alternative to Site A could be very short lived with the impact of climate change that is happening now. You would need to consider a site of approximately 8000' in order to maximise usage for the next 20-30 years.

I64-13

What is not mentioned in the document but is concerning;

- Private events

How can you credibly apply terms such as 'adaptive reuse' and 'community uses' to a project that significantly modifies an historic structure? These terms also concern a neighbourhood that need clarification of the word 'use' as private events such as weddings will further disrupt the lives of locals.

The primary concerns being:

- Noise
- Traffic flow
- Parking
- Debris left from outdoor events
- Alcohol

I64-14

As we said many years ago, the Lodge should stick to being a sports facility that includes Cross Country skiing in the winter and mountain biking in the summer. No more and no less. The Tahoe basin has sufficient venues to serve wedding needs so the notion of being all things for everyone is simply not relevant. Post COVID-19 all local and existing wedding venue businesses will need all the help they can get, and this lodge idea will only take away busines from them.

Private events create significant issues that need not be present, such as additional space and facilities that you simply don't have without major disruption. Also, no need for gyms, storage facilities (as everyone arrives and departs in a car so they can store their own kit at home) and so the list goes on. The original size of the Lodge has spiralled out of control due to the inappropriate and elaborate ideas from those involved. Stick to your core business and don't think it is easy to operate and be successful operating commercial off shoots.

- Alcohol

I64-15

Not mentioned in this document and it should be. The concerns =

- The sale of alcohol near the school.
- The sale of alcohol at private events

We believe the law states no distilled spirits can be sold within 200 yards of any school and 100 yards for wine. Project Site D has got to be close to the 200-yard law but even if it isn't, this proximity is concerning.

Alcohol creates a chain reaction of associated issues, i.e. drink driving, violence, drug abuse, sexual promiscuity, smoking and fire risk.

Site D (Polaris) is an un-lit street with no sidewalks so add alcohol to this (and the list of associated issues above) and you have a potentially fatal situation. The danger is real. Will the TCPUD be responsible for any accidents (fatal or not) caused by the re-location of this lodge to Site D?

- Impact on house prices

Not mentioned in the DEIR report. There is a possibility the re-location of the Lodge to Site D will have a negative impact to the surrounding homes and their values. In the case of this happening, are the TCPUD offering indemnity to those affected?

- Cost & financial control

If we understand correctly the land is owned by the TCPUD and you would rent it to the TCCSEA. Who therefore would have primary control over event bookings? We are guessing the TCCSEA as they have carte blanche to generate as much income as possible. If this is the case, can you publish strict guidelines as to what is permitted? The DEIR states ; provide opportunities for additional special events, community events, and private events. This needs defining.

How would putting a privately-owned facility on publicly owned land preserve the financial responsibility and transparency of TCPUD's property tax funds? Could you answer that please.

In summary:

This has already taken 6 years and it is laughable. We are in favour of no project and the return of this Lodge to the donor.

The disruption and expense to gain 76ft and a few extra parking spaces is preposterous. Go outside and measure 76ft.

With COVID affecting all our lives, the impact of which will be felt for many years to come, you can expect reduced revenue for the existing TXC operation. Rumour has it that Squaw are considering moth-balling this winter, which will invariably impact the local community/employment/loss of business/potential failure of local businesses and have dire consequences. Now is not the time to be ploughing public funds in to an floundering sector.

There is no mention of snow making plans. Climate change is a known threat and Tahoe have suffered poor winters over the years so having a provision for snow

I64-15
cont.

I64-16

I64-17

I64-18

I64-19

making facilities is essential for any ski operation. Money would be better spent investing in this rather than focusing on the Schilling Lodge.

Thank you for your time reading this.

Debbie White & Paul Niwano

I64-19
cont.

Letter I64 Debbie White and Paul Niwano

July 23, 2020

Response I64-1

The comment expresses opposition to the proposed Project. The comment also notes that the Draft EIR does not appear to include an alternative that would construct the Schilling Lodge at Site A with minimal modifications. In Chapter 4, "Alternatives," the Draft EIR considered two alternatives that would include minimal modifications to the historic building at Site A: (1) Site A – Reduced Project alternative that is described on page 4-3 of the Draft EIR, and (2) Site A – Modified Project alternative that is described on pages 4-10 through 4-14 of the Draft EIR. See response to comment I10-16, which addresses consideration of other alternatives and provides reasons why smaller Lodge alternatives were dismissed from further consideration or were not selected over the proposed Project. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-2

The comment states that mitigation for tree removal for the proposed Project (Mitigation Measure 3.3-2) could include realignment and reconfiguration of parking and a reduction in parking requirements, which would negate one of the main criteria for a new site; and that effects of tree removal on habitat, wildlife, and plants would not be worth the cost. The potential options for minimizing tree removal referenced in the comment apply to both the proposed Project and Alternative A. As described in Mitigation Measure 3.3-2 beginning on page 3.3-20 of the Draft EIR, the Project (either the proposed Project or Alternative A) will avoid and minimize the removal of trees, especially those larger than 30 inches diameter at breast height (dbh). This avoidance and minimization will be achieved through Project design to the greatest extent feasible and during the TRPA permitting process. The options of realigning and reconfiguring parking, and reducing parking requirements, are provided as examples of some of the design features or modifications that could be implemented to protect large trees and that are typically considered during the TRPA permitting process for projects. The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I64-3

The comment questions the conclusion that the proposed Project (Site D) would not alter travel patterns or increase traffic volumes to the extent that the capacity of a residential roadway would be exceeded.

The comment provides no evidence to support the claim that the Project would result in the exceedance of the 2,500 vehicles per day threshold for residential streets and cause an exceedance of roadway capacity. Additionally, the remainder of the comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-4

The comment indicates that parking has been one of the stated reasons for moving Tahoe XC from Site A to Site D, provides parking comparisons between the two locations, and expresses an opinion opposing Site D.

As described in comment O1-3, a detailed analysis of parking supply and demand is contained within Section 6, "Parking Analysis," of Append D in the Draft EIR. The aforementioned parking analysis evaluates the current demand of the Existing Lodge and determines the capacity needed at the proposed Project. In evaluating the parking needs of a specific site, it is usually desirable to use data collected at that site, if available. This is supported by ITE in their Parking Generation manual, which states that a survey of a site in a comparable local condition should always be considered as one potential means to estimate parking demand. Consistent with the Area Plan Implementing Regulations the parking analysis would be submitted for TRPA and County approval during the development review process. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the parking analysis within Draft EIR. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-5

The comment states that it is impossible for Polaris Road to support lane closures and detours during construction that are detailed in the Draft EIR.

As detailed in response to comment I35-11, Impact 3.5-5 starting on page 3.5-28 of the Draft EIR addresses potential construction-related traffic impacts resulting from implementation of the Project and includes Mitigation Measure 3.5-5, which requires the applicant to prepare and implement a temporary traffic control plan during construction activities. Impact 3.5-5 starting on page 3.5-28 describes that the duration of construction, number of trucks, truck routing, number of employees, truck idling, lane closures, and a variety of other construction-related activities are unknown at this time. Therefore, it is not known whether the Project would require lane closures and detours. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-6

The comments states that there is a mitigation measure that includes a shuttle bus program and posits the question of where cars are going to park for a shuttle bus to pick up and drop off. The comment concludes by expressing a lack of understanding as to how this is a feasible solution.

See response to comment A2-6, which describes that the mitigation measure requiring the TDM plan was removed because development of the TDM plan is a required part of the Placer County development review process consistent with Area Plan Policy T-P-12. As detailed in response to comment A2-6, the specific measures and associated details of a TDM plan, such as a shuttle bus program, would be analyzed for feasibility and developed by the applicant as part of the development review process; and thus, are not included in the Draft EIR. However, as detailed in response to comment A2-6, in order to provide a more refined and comprehensive set of potentially feasible measures that could be incorporated into the Project TDM plan, a planning level assessment of potentially feasible TDM measures was completed. The TDM measure assessment provides general descriptions of the individual TDM measures, addresses feasibility and applicability of these measures to Project, and provides general ranges of VMT reductions associated with the measures. This assessment is included as Appendix A to this Final EIR. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-7

The comment states that there are clear safety risks associated with the increase in traffic generated by the proposed Project that need to be addressed. The comment notes that Polaris Road has no sidewalks and is not lit; and thus, an uptick in traffic volumes will affect pedestrian, resident, and neighborhood safety. The comment concludes that safety has not been specifically addressed in the Draft EIR.

Please see Master Response 1: Transportation Safety. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-8

The comment asks if the 4-year construction period assumed in the GHG analysis, and associated impacts, would actually occur and states that Section 3.8, "Noise," assumes that construction would occur daily from 8:00 a.m. to 6:30 p.m. See response to comment I41-41, which explains that the estimated construction schedule has been reduced from 4 years to 2 years.

The comment also raises concerns with the recommendation to install rooftop solar photovoltaic (PV) panels included in Mitigation Measure 3.7-1. The language of Mitigation Measure 3.7-1 provides flexibility to the Project applicant by providing several onsite GHG-reducing recommendations to lower Project-generated emissions to zero. The applicant may use PVs to reduce emissions; however, if PVs are found to be infeasible, the applicant may implement other mitigation tools to achieve zero net emissions. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-9

The comment states that daily construction over several years would impact living conditions for the community and that the analysis did not include residents in the definition of sensitive receptors. As described on page 2-22 of the Draft EIR and updated in Chapter 2 of this Final EIR, construction is anticipated to begin in 2022 and end in 2024. Second, sensitive receptors are defined generally on page 3.8-10 in Section 3.8, "Noise," of the Draft EIR as land uses where noise exposure could result in health-related risks to individuals and specifically includes residences. Further, the Draft EIR identified residences that would be closest to the proposed construction activities for purposes of conducting a worst-case noise analysis, as described under Impact 3.8-1 of Section 3.8, "Noise," of the Draft EIR.

Regarding noise impacts, negative health effects tend to occur when people are continually affected by intrusive noise during sensitive times (e.g., sleep). For this reason, TRPA and Placer County have adopted ordinances that allow construction noise during the less sensitive times of the day. This is because construction noise, while occurring with other typical daytime noise-generating activities (e.g., vehicular traffic, music, ambulance sirens), does not stand out on its own as a substantial noise source, especially at increasing distances from the source. It is also important to note that the analysis in the Draft EIR was conservative and based on worst-case noise levels for the loudest phase of construction. Typical construction noise fluctuates during the day over different locations and over the duration of the entire phase, not resulting in the same level of noise exposure at the same receptor for extended periods. As discussed under Impact 3.8-1 beginning on page 3.8-14 of the Draft EIR, due to the temporary nature of construction activity and that construction would comply with daytime noise limits, construction noise would not result in adverse health impacts at nearby receptors. No further analysis is needed.

Response I64-10

The comment states that the vibration analysis failed to mention impacts to residential buildings, including potential damage to structures, and that pre-construction surveys should be conducted as well as compensation for damage should be provided. Impact 3.8-2 beginning on page 3.8-16 in Section 3.8, "Noise," of the Draft EIR evaluated the potential for construction vibration to result in human disturbance as well as damage to existing structures. As discussed on pages 3.8-16 and 3.8-17 of the Draft EIR, anticipated construction activities would not be located within distances where vibration has the potential to result in building damage. Therefore, impacts to existing structures were deemed less than significant. Because impacts would be less than significant, no additional mitigation such as a pre-construction survey or indemnification plan is required. Further, the comment does not provide any evidence that the vibration impact analysis presented in the EIR is inadequate; therefore, no further analysis is required.

Response I64-11

The comment states that the mitigation proposed to reduce impacts from amplified sound will not be adequate and that the new noise sources will adversely affect residents in the area. First, noise standards are set by regulatory agencies to preserve the nature of a community or neighborhood and intended to protect the health and safety of the community. Thus, new noise sources that are kept to below the applicable noise standards would not pose health or safety concerns. As required by Mitigation Measure 3.8-3 beginning on page 3.8-18 in Section 3.8, "Noise," in the Draft EIR, amplified sound sources would be required to be designed to minimize noise exposure through the use of intervening buildings and speaker location. Further, the mitigation measure requires that any proposed amplified sound source also be measured and shown to comply with Placer County noise standards prior to Project approval. Thus, the requirements in Mitigation Measure 3.8-3 ensure that any new noise source would not exceed Placer County noise standards and thus would not result in excessive noise levels at nearby receptors such that adverse health effects would occur. No further analysis is necessary.

Response I64-12

The comment notes that the proposed Project site is 76 feet higher in elevation than Site A and disagrees with the need to locate the Lodge near flat terrain. The comment also asserts that the higher elevation is more exposed to sunshine and, thus, snow quality would be diminished. See response to comment I35-5 that addresses criticisms of the proposed Project at the proposed location related to the increase in elevation compared to the site of the Existing Lodge. Response to comment I35-5 also addresses the benefit associated with the proximity to user-friendly terrain at the proposed Project site. The comment's opinion does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-13

The comment states that global warming is driving significant changes in our winters and the benefits of Site D as an alternative to Site A could be short lived in light of the effects of climate change. The comment asserts a site at 8,000 feet elevation would need to be considered to maximize use in the long term. See response to comment I50-6, which addresses concerns related to the effects of climate change on the Project. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-14

The comment takes issue with use of the terms "adaptive reuse" and "community uses" to describe the proposed modifications to a historic structure. The comment expresses concern related to private events, such as weddings, which cause concerns related to noise, traffic flow, parking, debris, and alcohol use. The comment also disagrees with the need for gyms and storage facilities.

Regarding the potential for weddings to be hosted at the Schilling Lodge, page 2-14 under "Premier Events and Large Special Events," in Chapter 2, "Description of the Proposed Project and Alternatives Evaluated in Detail," states:

As part of the TCCSEA Management Plan, TCCSEA does not intend to host weddings. However, TCPUD and/or TCCSEA could decide, at a future date, that weddings are appropriate to either supplement revenue or for other reasons. For the purposes of this EIR, private weddings are considered a Large Special Event and were included in the Large Special Events analysis and would not be considered an addition to those events.

Table 2-3 on page 2-13 and the "Special Events" section on pages 2-14 and 2-15 of the Draft EIR identify the assumptions related to special events that are considered in the impact analysis in the Draft EIR. The potential concerns related to noise, traffic, and parking from events that may be held at the Schilling Lodge are addressed in Section 3.5, "Transportation," and Section 3.8, "Noise," in the Draft EIR. See response to comment I10-3, which explains "adaptive reuse" of the Schilling residence. See response to comment I10-4, which explains how the Schilling Lodge would serve community uses. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-15

The comment expresses concern with the sale of alcohol near the school and at private events. The comment summarizes their understanding of the sale of distilled spirits and wine near a school and states that Site D is likely within a distance from the school that would prohibit the sale of alcohol. The comment expresses concern about secondary effects of alcohol use. The comment asks if TCPUD would be responsible for any accidents caused by the relocation of the Lodge to Site D.

See response to comment I10-19, which explains that alcohol would not be sold at the Schilling Lodge. All operations at the Schilling Lodge, including during all events, must obey all laws related to the provision of alcohol. Enforcement of laws related to the sale or provision of alcohol is not a topic subject to CEQA review. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-16

The comment states that the impact on house prices is not mentioned in the Draft EIR and asserts that relocation of the Lodge would have a negative impact on the surrounding homes and their values, and asks if TCPUD is offering indemnity to those affected. The comment provides no specific evidence to suggest that the proposed Project would result in a decrease in home values. The comment's concern related to adverse effects on the value of home values does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-17

The comment asks which entity would have control over event bookings. The comment requests an explanation of how the Project would preserve the financial responsibility and transparency of TCPUD's property tax funds.

See response to comment I10-2, which discusses TCCSEA would have primary control over booking events at the Schilling Lodge and TCPUD would have primary control over booking events at the Highlands Community Center. See response to comment I41-8, which addresses concerns related to financial aspects of the Project. The comment expressed is not related to a topic that requires analysis in the EIR under CEQA.

Response I64-18

The comment notes the 6-year timeframe that has occurred thus far, expresses opposition to the Project, disagrees with the benefit associated with moving the Lodge to a higher elevation and additional parking. The comment notes the potential effect COVID has and believes there would be reduced revenue for Tahoe XC. The financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. The comment does not raise any issues related to CEQA or provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I64-19

The comment notes that there is no mention of snowmaking plans, climate change is a known threat, and Tahoe has suffered poor winters over the years. The comment believes money would be better spent investing in snowmaking rather than on the Schilling Lodge. See response to comment I50-6, which addresses concerns related to the effects of climate change on the Project. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Darlene Boggeri](#)
To: [Kim Boyd](#)
Subject: Cross country building
Date: Friday, July 24, 2020 4:30:33 AM

Letter I65

Kim

We are very troubled & disappointed with the proposed project.

The very large building & parking lot have no place in a family neighborhood much less next to a school. Fix the exciting building but keep it at a realistic size for the neighborhood

I65-1

Why is bigger always better? Living at Tahoe is about the outdoor living, hiking biking, the animals, not the enormous buildings on PUBLIC LAND

Fires are a real threat in Tahoe. How do you propose the extra vehicles & people evacuate with the one road in & out?

I65-2

Traffic— Old Mill & Polaris are already very busy roads. Children walk to school, locals walk on the roads some with dogs to get to the hiking trails. More cars on the road will create a more dangerous situation

I65-3

Water-all the water that will be needed for this project & use of water after

I65-4

We could go on & on but please listen to the people who actually live here & all the concern & don't proceed with this project. Don't destroy the peace & quiet & create more traffic & fire dangers.

I65-5

Robert & Darlene Boggeri
 Sophie & Silvio
 Polaris Road

Letter I65 Robert and Darlene Boggeri

July 24, 2020

Response I65-1

The comment expresses opposition to the proposed Project. The comment expresses the opinion that the large building and parking lot do not belong in a neighborhood or next to a school. The comment suggests using the Schilling residence building but keeping it at a realistic size for the neighborhood. See response to comment I35-6, which addresses the land use and zoning designation on the proposed Project site and Alternative A site. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I65-2

The comment notes that fires are a real threat in Tahoe and asks how the extra vehicles and people would evacuate with the one road in and out. The analysis of wildfire effects in the Draft EIR acknowledges that the proposed Project site and the Alternative A site are located within a Very High Fire Hazard Severity Zone (see pages 3-15 and 3-16 of the Draft EIR). The analysis concludes that implementation of the proposed Project or Alternative A would not exacerbate wildfire risks. The Draft EIR also analyzed potential impacts on emergency response and evacuation and concluded that the Project-generated traffic, including for special events, would be appropriate to the capacity of the facility and therefore would not generate traffic volumes that would physically interfere with implementation of an adopted emergency response plan or emergency evacuation plan (see page 3-12 of the Draft EIR). Also see response to comment I10-8, which addresses wildfire impacts, and response to comment I10-7, which addresses concerns about impacts on emergency response and evacuation. The comment does not provide specific evidence that vehicle trips generated by the Project would not be able to evacuate in the event of a wildfire and does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I65-3

The comment contends that Old Mill Road and Polaris Road are already very busy roads and that children walk to school along these roads, and locals walk on the roads, some with dogs, to get to the hiking trails. The comment concludes by expressing their opinion that the addition of more cars on the road would create a more dangerous situation.

Please see Master Response 1: Transportation Safety. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I65-4

The comment makes a general statement about the water that would be needed for the Project. The Draft EIR analyzes the increase in water demand associated with the proposed Project and Alternative A in Impact 3.11-1 beginning on page 3.11-9 in Section 3.11, "Utilities," of the Draft EIR. The analysis concludes that there is sufficient water supply to meet the needs of the proposed Project and Alternative A, although some water supply line improvements may be required if Alternative A is implemented. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR.

Response I65-5

The comment requests that TCPUD listen to the residents' concerns and to not proceed with the Project. The comment expresses concern regarding an increase in traffic and fire dangers. The Draft EIR acknowledges that the Project would increase traffic volumes along roadways in the vicinity of the Project, but would not result in a significant impact related to traffic (see Impacts 3.5-1 and 3.5-2 on pages 3.5-19 through 3.5-22 in Section 3.5, "Transportation," in the Draft EIR). See response to comment I10-8, which addresses concerns related to wildfire. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [jackie Clark](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Friday, July 24, 2020 6:31:21 AM

Letter
I66

As an employee of Tahoe Cross Country I have seen first hand the need for a new building. My main job there is teaching, renting skis and waxing and ski repair. There were so many days that we had more people then equipment, there is just not enough space for any more boots or skis. We also always ran out of places to put customers' personal things when they rented equipment , some would take their things back to the car for lack of storage in the shop.

I would wax on a daily basis, at least ten pairs a day. The waxing bench is right where we rent ski so there would be the constant smell of wax for the employees and customers which I'm sure can't be good. We have a ventilation system but it just isn't good enough. There is also lack of storage behind the bench and it is so small that only one person could wax at a time.

Then there were the lessons. If you ever have come to the nordic center you know how steep the first hill is. Trying to teach a beginner on that is really hard. A new building and a new place would give such a great opportunity to have a great impact on a beginner .

The small community of Tahoe Cross Country could provide a huge impact, we just need the space to do this. Thank you for listening and I hope you will consider this great opportunity to do so.

Thank you,
Jackie Clark

I66-1

Letter I66 Jackie Clark

July 24, 2020

Response I66-1

The comment includes background about the letter author's experience working at Tahoe XC and the challenges associated with the Existing Lodge. The comment expresses support for the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Meghan Robins](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Friday, July 24, 2020 10:44:14 AM

Letter
I67

Dear TCPUD,

As a former North Tahoe Middle and High School Nordic skier (class of 2004), I want to comment about the convenience of having Tahoe XC trails out the backdoor of NTHS. Regarding the Draft EIR put out by TCPUD, I think this convenience for students (and parents) is an important consideration specifically for the Transportation section of the Draft EIR. If the Tahoe XC lodge moves to a site closer to NTHS, it will improve accessibility to middle and high school skiers and parents in these ways:

1. Easier transition from school day to practice. In my day, Nordic ski team athletes stored our skis and backpacks in our cars or the broken-down ski shed by the bus garage. If you did not have a car, you risked getting your school work and street clothes locked in the high school locker rooms. This happened on more than one occasion. Most of us stored our gear in our cars, if we could. Or friends cars, if that was an option. Otherwise, we rushed back from practice to beat the janitor from locking us out. If the Tahoe XC lodge were closer to the high school, NT Nordic skiers could rely on the lodge's new team locker rooms to store their valuable ski gear, band instruments, and backpacks. And Tahoe XC would be more attuned to the needs of young Nordic athletes.

2. Bolster Team Pride. If NT ski teams had convenient access to Tahoe XC's waxing benches (and staff expertise), this proximity would probably bolster the point of pride for NT Nordic ski athletes. We "Nordic nerds" were often forgotten about (out of sight out of mind) by the rest of the school because we're always out on the trails and behind the bus garage. To have a fully established lodge serve as middle and high school team support would show these athletes that Nordic skiing is a serious and well-respected sport and that there is a massive community that encourages and embraces this world of athletics.

3. One collection point for kids & parents. I assume that the NT middle and high school teams still start and finish practice at the high school parking lot (by the bus garage), so I assume parents picking up middle school kids are already driving on Polaris. Parents who have kids on the middle school team and in youth programs like Strider Gliders, however, are still having to drive to the middle school, where their kids' school packs and street clothes are, then back to Tahoe XC, where Strider Gliders starts and ends. It would be interesting to know how much traffic occurs specifically between NTHS and Tahoe XC just by parents driving back and forth, back and forth. I do not believe your traffic study does, or could, reasonably measure that specific of a stat. I didn't read one, but maybe I missed it. My suspicion is that some parents are driving laps between NTHS and Tahoe XC, if their kids are in both programs. It is unreasonable to ask a middle schooler to end their practice at Tahoe XC because they need to collect their school belongings back at the middle school. Additionally, now that North Tahoe School serves 5th graders, some of those kids are in Strider Gliders and have to figure out how to get themselves to Tahoe XC and back, while dealing with their school backpacks and ski gear (likely relying on parent transportation). This transportation detail would be solved for parents and kids if the school and lodge were located in close proximity. To that end, I also suggest a walking pack (paved and plowed?!) between the new lodge and the bus garage, because that's the natural cut through kids will take.

I67-1

I hope you find my comments helpful. As a former Strider Glider, former NT school Nordic ski athlete, and current user of Tahoe XC's trails, I fully support the Schilling Lodge Project and believe that the entire community will benefit in great and unexpected ways from this expansion.

I67-1
cont.

Thank you for taking my comments,
Meghan Robins

Letter I67 Meghan Robins
July 24, 2020

Response I67-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, and expresses support for Site D for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

July 23, 2020
Tahoe City PUD

Letter
I68

Ms. Kim Boyd,

As a resident of the Tahoe/Truckee area since 1971, I have skied at Tahoe XC since the early Skip Reedy days in the late 1970's. In between then and now I developed and served as supervisor for the Diamond Peak XC center on the Mt Rose Hwy for IVGID in the 1990's. Although I reside in Truckee and have had season passes at Tahoe Donner XC for numerous years, the potential for seeing an upgrade for the Tahoe City XC community as identified in Site D - Full Project in the draft EIR is exciting.

Based on my previous experience running a cross country ski facility, my comments are more operations oriented. The steep terrain directly out of the current location makes it difficult for beginner skiers and others to begin their skiing experience. Ski lessons are also made more difficult without level terrain to teach resulting in less successful experiences for first time or novice skiers. Safety may also be a concern here where beginner skiers have difficulty taking on steeper terrain (and possibly icy conditions) at the end of their day getting back to the lodge. My experience at the Diamond Peak XC was a similar situation with steep terrain at the base lodge. Everything was more difficult, from operations to achieving user satisfaction. The Site D project location would solve these problems.

As the Tahoe area experiences more frequent years of marginal snow quantity, I believe the higher elevation of this site could be important in maintaining operations and keeping the trails open. It can be costly and time consuming if you need to "farm" snow near base lodge areas with low snow levels so skiers can access trails. Operating at the higher elevation may reduce the frequency or eliminate the need to move snow to maintain operations.

Sufficient parking at the facility and traffic flow on nearby roads are important aspects to consider. The Site D project will have 100 parking spaces and according to information on the Executive Summary (EIS), this falls within acceptable parameters for normal operations and also peak days. Also in the Executive Summary is information on traffic volumes and it appears that the use falls within Placer County standards for residential roadways. No mitigation is required for either parking or traffic volumes.

In my opinion, the Schilling building, modified for use as the facility/lodge is a wonderful choice. The historical significance of the building will add character and local culture to the visitor experience. The Schilling building would allow for larger spaces so that facility operations (skiing and mountain biking) can be more efficient and also provide an appropriate atmosphere for community gatherings/meetings.

I68-1

Greg Mihevc
Truckee, CA

Letter I68 Greg Mihevc

July 24, 2020

Response I68-1

The comment includes background information about the letter author's experience with cross-country skiing, summarizes benefits of the proposed Project, and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Jennifer Lees](#)
To: [Kim Boyd](#)
Subject: We support the Tahoe Cross-Country Lodge Replacement Project
Date: Friday, July 24, 2020 11:24:31 AM

Letter I69

Hi Kim,

Thank you for your work on this project. My husband and I support the Tahoe Cross-Country Lodge Replacement Project, as proposed. The proposed location is perfect for our community as there is ample parking and open space to support it. There is not enough safe parking at the current location. It is scary when you end up out on the street with a Chariot, two kids, skis, and boots slipping around. Perhaps someday a second exit road through the edge of Burton Creek could provide fire emergency and traffic alleviation, but we cannot miss the opportunity for a world-class rated winter facility in a great location with a beautiful historic lodge.

I69-1

Thank you again,

Jennifer & Dan Stoll

Letter I69 Jennifer and Dan Stoll
 July 24, 2020

Response I69-1

The comment summarizes benefits of the proposed Project and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Will Stelter](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Friday, July 24, 2020 12:57:03 PM

**Letter
I70**

Hello Kim,

I'm sorry I'm on the last day here, I hope I'm not too late. Please confirm receipt and likewise if the below comment is within the comment period.

Comment per below:

I'd like to thank Tahoe XC and TCPUD for preparing a thorough document. It is nice to see such a well thought out analysis and review of options, all with the goal of addressing existing operational deficiencies and enhancing the Cross Country center. As a winter time destination area, together with North Tahoe's desire to promote snow sports and provide options for locals and visitors alike, this proposed project is a positive step toward showcasing North Tahoe as the world class area for outdoor recreation we all know it is. Likewise it is nice to see mitigation of impacts to a less than significant level. Impacts aside, a simple review of Google Earth with the adjacent school, track, multiple fields, etc. makes site D the most desirable from a common sense perspective. A great yin yang relative to shared parking, school athletic programs, etc.

I70-1

Thank you for a great project.

Will S.

Letter I70 Will Stelter

July 24, 2020

Response I70-1

The comment expresses support for Site D for the proposed Project and for the analysis in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Jeffery Harris
P.O. Box 5742 (Polaris Road)
Tahoe City, CA 96145
JDH@Eslawfirm.com

Letter
171

Tahoe City Public Utility District
Kim Boyd, Senior Management Analyst
PO Box 5249, Tahoe City, CA 96145
Email: kboyd@tcpud.org

Re: **Tahoe XC Draft EIR**

Dear Ms. Boyd and Board of Directors:

Thank you for the opportunity to comment. I support this Project and have no strong preference as between the possible Sites. My comments are focused mainly on cumulative impacts, traffic, parking, and enforcement measures to preserve the quality of life and avoid significant impacts on Highlands’ residents.

I71-1

1) **The Project Should Discuss The Potential Cumulative Impacts Associated With The Proposed Dollar Creek Crossing Project On The Former Nahas Property.**

While the DEIR mentions the Dollar Creek project, the potential cumulative impacts of the proposed Project with the reasonably foreseeable Dollar Creek Project should be discussed in separate sections in each of the twelve (12) environmental disciplines in Sections 3.1-3.12 of the Final EIR.

I71-2

Although several sections discussed the potential combined effects of these two major projects in the Highlands, the potential cumulative impacts should be discussed in each Subsection of Section 3, *Environmental Setting, Environmental Impacts, And Mitigation Measures*. A separate subject heading in each of these twelve Subsections of Section 3 of the FEIR will ensure that the FEIR adequately considers the potential for cumulative effects.

2) **The Traffic Analyses Should Be Updated To Consider Potential Cumulative Impacts Associated With Connection With The Reasonably Foreseeable Dollar Creek Crossing Project.**

To satisfy the Project Objective to “[c]onstruct a new lodge that minimizes effects on the neighborhood,” the traffic impacts should consider the combined effects of the Project with Dollar Creek Crossing.

I71-3

In particular, the traffic analyses should assume two separate scenarios. First, the analyses should assume that the Dollar Creek Crossing has no traffic connections to Village

{00522712;2}

Road or the Highlands. It is logical to assume that if the traffic from Dollar Crossing is not allowed to bleed into the Highlands through connection, the cumulative traffic impacts on the Highlands may not be significant. Second, the traffic analyses should also analyze a worst case scenario where the Dollar Crossing Project is connected to Village Drive or otherwise connected to the Highlands, allowing the traffic impacts from both projects to combine into significant effects.

I71-3
cont.

Since Dollar Creek Crossing has not committed to a traffic and circulation plan, both scenarios (connection of Dollar Creek to the Highlands and no connection) are reasonably foreseeable and must be studied.

3) **New Traffic Count Surveys Should Be Performed to Account For the Greater Use of the Polaris to Village to Fabian Route Used During the School Year and Peak Winter Months.**

Both analyses discussed in Comment 2 above, should take into consideration the greater use of Polaris Road compared to Old Mill Road. During the school year, the High School and Middle School traffic predominately uses Polaris Road as do the buses, garbage and recycling services, and other vehicles to support the High school and the Middle School. During Winter months, more traffic uses Polaris to avoid the steeper grade of Old Mill. The Polaris to Village to Fabian route’s heavier flow results in greater impacts at the intersection of Fabian and Highway 28.

I71-4

During school hours and during Winter months, it can be nearly impossible to make a left turn onto Highway 28 from Fabian. This existing, baseline condition of a lack of safe access and egress at Highway 28 and Fabian is especially true when snow and ice combine with heavy ski-related traffic headed toward the West Shore resorts, Alpine Meadows, and Squaw Valley. With the hundreds of new vehicle associated with the Dollar Creek Crossing project, these already unsafe conditions will be further exacerbated.

The analysis of this existing propensity for greater use of Polaris Road to Village to Fabian should be supported by more recent traffic count studies to ensure accuracy. New traffic counts on all routes should be performed to establish an accurate baseline (adjusted to recognize that COVID-19 has suppressed traffic in the vicinity).

4) **To Mitigate Impacts On Highland Residents, The Project Should Continue the Current Practice of Imposing Non-Resident Parking Restrictions In The Highlands and Requiring Resident Parking Stickers.**

To prevent the significant effects of overflow parking impacts to Highlands’ residents, the project should require as a mitigation measure resident parking stickers. There are already parking restrictions with the existing Tahoe XC lodge, prohibiting parking on one side of the street and prohibiting certain seasonal parking. Similar restrictions commensurate with the existing parking prohibitions and limitations should be imposed to make enforceable the

I71-5

{00522712;2}

mitigation measures to prevent overflow parking from creating a significant adverse effect in the Highlands.

I71-5
cont.

5) To Ensure Public Safety, The Project Should Include Sidewalks, Curbs And Gutters In The Vicinity Of The Lodge.

To ensure the safety of the users of the TXC lodge and the residence of the Highlands, the project should include curbs, sidewalks and gutters in the vicinity of the Project’s Lodge. It is clear that there will be times when users of these important recreational facilities may have to carry their gear and belongings some distance. This will be particularly true if the Lodge is served with local transit (bus stops). Sidewalks, curbs, and gutters in the vicinity of the Lodge will ensure public safety during peak use periods (weekends and Holidays).

I71-6

Thank you for your hard work on this important project.

Sincerely,



Jeffery D. Harris

{00522712;2}

Letter I71 Jeffery D. Harris

July 24, 2020

Response I71-1

The comment provides an introduction to letter, stating the comments focus on cumulative impact, traffic, parking, and enforcement measures to preserve the quality of life and avoid significant impacts on residents of the Highlands neighborhood. The comment also expresses support for the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I71-2

The comment suggests that the cumulative impact analysis of the Dollar Creek Crossing project should be discussed in a separate subheader in each of the resource topic sections of the Draft EIR.

As stated on page 3-4 under the "Project List" header in Section 3.1.5, "Cumulative Setting:"

Probable future projects considered in the cumulative analysis meet the criteria described above: they are in the proposed Project vicinity and have the possibility of interacting with the Project or Alternative A to generate a cumulative impact (Table 3.1-2 and Figure 3.1-1). This list of projects was considered in the development and analysis of the cumulative settings and impacts for most resource topics within the geographic scope of each resource topic (as listed in Table 3.1-1).

As noted on page 3-3 in the Draft EIR regarding the geographic scope within which it would be feasible for the Project and a cumulative project to combine to result in a cumulative impact:

The geographic area that could be affected by the Project varies depending on the environmental resource topic. When the effects of the Project are considered in combination with those of other past, present, and reasonably foreseeable future projects to identify cumulative impacts, the specific projects considered may also vary depending on the type of environmental effects being assessed.

Table 3.1-1 on page 3-4 of the Draft EIR describes the geographic scope of the analysis for each resource area. For example, the geographic scope of the analysis for air quality consists of the Tahoe region for regional air pollutants, and the Project vicinity for air pollutants with localized effects.

The Draft EIR includes a list of the projects considered for purposes of assessing cumulative effects. This list appears in Table 3.1-2 on page 3-5. The table includes the proposed Dollar Creek Crossing project, which is identified as in preliminary planning stages.

The Dollar Creek Crossing project is proposed to be located at the northeast corner of the intersection of SR 28 and Fabian Way. This site is located approximately 0.5 mile south of the Alternative A site, and approximately 1 mile southeast of the proposed Project site. As of preparation of this Final EIR, this cumulative project is still under development and options presented to the public have been revised throughout the public outreach process. Several development options are under consideration. At the time of preparation of the Draft EIR, the estimate of residential units was developed based on what would be allowable for the site under the Area Plan (up to an estimated 214 residential units). As of January 2020, three options were presented with residential units ranging from 174 to 204 residential units (Placer County 2020). These plans are preliminary. The environmental review process for this proposal has not commenced. To provide the current understanding of the Dollar Creek Crossing project and clarify the cumulative impacts between this project and the proposed Project, the description of the Dollar Creek Crossing project is updated below and in Chapter 2, "Revisions to the Draft EIR," in this Final EIR. The clarification presents the range of potential residential units that are less than and not substantially different than initially identified in the description of this cumulative project; thus, the clarification does not alter the conclusions with respect to the significance of any environmental impact.

The description of the Dollar Creek Crossing project in the third column of the ninth row in Table 3.1-2 on page 3-5 in the Draft EIR is revised as follows:

Placer County is in the preliminary planning stages with a developer for an affordable housing project at this site. Because of the nature of the project in its early planning stages, a preliminary estimate of the number of multi-family residential units that would be allowed for these parcels was calculated using the density limits in the Area Plan and the parcel area; it is estimated that the development could include up to 214 residential units that would primarily be multi-family units with a few single-family units. This estimate does not account for site constraints or other considerations that could ultimately reduce the number of residential units. Additionally, it is possible that, once submitted, the project application would propose a mix of multi-family and single-family residential units and community space commercial. As of January 2020, the low end estimate of residential units is 174 and the upper limit estimate is 204. Two of the options propose access to the site from SR 28 and Fabian Way. One option proposes access to the site from SR 28, Fabian Way, and Village Road. At this time, it is assumed that vehicle access to the project site would be provided on Fabian Way and State Route (SR) 28.

Additionally, to provide consistency throughout the Draft EIR, the description of the Dollar Creek Crossing project in Section 3.5, "Transportation," is updated below and in Chapter 2, "Revisions to the Draft EIR," in this Final EIR. The clarification presents the range of potential residential units that are not substantially different than initially identified in the description of this cumulative project; thus, the clarification does not alter the conclusions with respect to the significance of any environmental impact.

The description of the Dollar Creek Crossing project in the third bullet starting on page 3.5-31 of the Draft EIR is revised as follows:

- ▶ The potential Dollar Creek Crossing project is located in the northeast corner of the SR 28/Fabian Way intersection. As this project is in the early planning stages, the specific details regarding the proposed land uses and site access were not available at the time of completion of the traffic modeling. Thus, a preliminary estimate of 169 new multi-family residential units was assumed to be constructed, with 50 percent of the vehicle trips to and from the site accessing the property via a driveway on SR 28 and the other 50 percent assumed to access the site via a potential new driveway on Fabian Way. Standard Institute of Transportation Engineers (ITE) trip generation rates were used to estimate the trip generation for the 169 units. As of May 2019, the Dollar Creek Crossing project proponents indicated that the project could include up to 214 residential units, which would almost entirely be multi-family residential units and a few single-family residential units. As of January 2020, the low end estimate of residential units is 174 and the upper limit estimate is 204. The difference between the modeled number of residential units and the most recent available greater number of residential units presented in May 2019 and January 2020, is are not anticipated to result in a substantial change in the cumulative traffic analysis such that there would be a change in the impact conclusions discussed below.

The cumulative impact analysis in each of the resource topic sections of the Draft EIR considered the potential cumulative impacts between the proposed Project and cumulative projects that would have impacts that could cumulatively combine with the proposed Project to result in a potentially significant cumulative impact. Whether such cumulative effects may occur depends on the resource area being discussed. The potential for cumulative impacts from the Dollar Creek Crossing to occur are specifically described in relation to traffic (see pages 3.5-31 and 3.5-32 of the Draft EIR), utilities (see pages 3.11-18 and 3.11-19), and energy use (see page 3.12-9). Traffic and utilities are the two areas in which the proposed Project and the Dollar Creek Crossing project have the potential to result in cumulative environmental effects. The Dollar Creek Crossing project will be required to undergo its own environmental review and will be required, if feasible, to minimize any potentially significant impacts to a less-than-significant level.

In response to the comment, to clarify the potential cumulative impacts that could occur from implementation of the Project and the Dollar Creek Crossing project, the cumulative analyses in Section 3.3, "Biological Resources;" Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources;" Section 3.6, "Air Quality;" Section 3.7, "Greenhouse Gas Emissions and Climate Change;" Section 3.8, "Noise;" Section 3.9, "Geology, Soils, Land Capability, and Coverage;" and Section 3.10, "Hydrology and Water Quality," are revised below and in Chapter 2, "Revisions to

the Draft EIR," of this Final EIR. As described in the revisions below, these clarifications do not alter the conclusions with respect to the significance of any environmental impact.

The following edits are made to the biological resources cumulative impact analysis on pages 3.3-26 and 3.3-27 in Section 3.3, "Biological Resources," of the Draft EIR:

The primary biological resource issues relevant to cumulative impacts, where the proposed Project or Alternative A have the potential to contribute to impacts generated by other projects, are effects related to special-status plant species (Impact 3.3-1), tree removal (Impact 3.3-2), invasive plant species (Impact 3.3-3), and wildlife movement (Impact 3.3-4). Past projects and activities have resulted in the decline of some native plant populations and rarity of some species, and the introduction and spread of various noxious weeds and other invasive plant species in the Project region, resulting in habitat degradation and other adverse effects on biological resources. The current presence and spread of noxious weeds and invasive species in the Project region, and the decline of some native plant populations and species, are considered significant cumulative impacts. The significance level of existing cumulative effects related to tree removal and wildlife movement generally in the Tahoe region is less clear. Existing and foreseeable future projects have the potential to continue these trends, although current policies, regulations, and programs currently minimize the potential for the further spread of noxious weeds and invasive species and loss of rare or special-status plants. For example, the Dollar Creek Crossing project is proposed on 11.5 acres of undeveloped land near the proposed Project and Alternative A sites. The proposed Dollar Creek Crossing project is located adjacent to residential development, neighborhood roads, and SR 28 and a portion of the site has been previously disturbed. However, the site may provide opportunities for wildlife movement and construction of the project could disturb wildlife movement in the area. While the Dollar Creek Crossing project may result in preserving 60 percent of the site for open space, construction activities would still result in tree removal and have the potential to adversely affect special-status plant species and cause the spread of invasive plant species.

Implementation of either the proposed Project or Alternative A would remove native trees 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. However, natural vegetation types on the proposed Project and Alternative A sites (i.e., Sierran mixed conifer and perennial grassland) are fragmented and highly disturbed; and the quality of habitat for native species is limited by existing disturbances and degradation from residential, recreation, and commercial uses on and near either site; adjacent roads; and associated edge effects. As described in detail for Impacts 3.3-1, 3.3-2, 3.3-3, and 3.3-4, direct or indirect effects on these biological resources as a result of the proposed Project or Alternative A would be relatively minor. Additionally, with implementation of Mitigation Measure 3.3-1, potential disturbances or loss of special-status plants would be avoided, minimized, or compensated for. With implementation of Mitigation Measure 3.3-3, invasive plant management practices would be implemented during Project construction and the inadvertent introduction and spread of invasive from Project construction would be prevented.

The proposed Project or Alternative A, when combined with past, present, and reasonably foreseeable future projects, including the Dollar Creek Crossing project, would not substantially affect the distribution, breeding productivity, population viability, or the regional population of any common or special-status species; or cause a change in species diversity locally or regionally. Additionally, Project implementation, would not threaten, regionally eliminate, or contribute to a substantial reduction in the distribution or abundance of any native habitat type in the Tahoe region. Therefore, the Project **would not have a considerable contribution** to any significant cumulative impact related to biological resources.

The fifth paragraph on page 3.4-19 in Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," is revised as follows:

No known unique archaeological resources, TCRs, or human remains are located within the boundaries of the proposed Project site or Alternative A site; nonetheless, Project-related earth-disturbing activities could damage undiscovered archaeological resources, TCRs, or human remains. Like the proposed Project and

Alternative A and other projects listed in Table 3-1, ground-disturbing activities for the Dollar Creek Crossing project could result in discovery or damage of as-yet undiscovered archaeological resources or uncover or destroy previously unknown archaeological resources with ethnic or cultural values. The proposed Project or Alternative A, in combination with other development in the region, such as the Dollar Creek Crossing project, could contribute to ongoing substantial adverse changes in the significance of unique archaeological resources resulting from urban development and conversion of natural lands. Cumulative development could result in potentially significant archaeological resource impacts.

A new paragraph is added after the first paragraph on page 3.6-19 in Section 3.6, "Air Quality," of the Draft EIR as follows:

The Dollar Creek Crossing project would result in development of up to an estimated 204 residential units that could result in greater construction and operational emissions than the proposed Project or Alternative A and could result in a potentially significant impact on regional air quality. However, the project would be required to reduce significant impacts to the extent feasible and would be required to pay the air quality mitigation fee required by TRPA Code Section 65.2, which would offset the project's contribution to cumulative air quality impacts. Other cumulative projects in Table 3.1-2 would similarly be required to reduce potentially significant air quality impacts, which would reduce contributions to a cumulative air quality impact.

The last paragraph on page 3.7-19 in Section 3.7, "Greenhouse Gas Emissions and Climate Change," of the Draft EIR is revised as follows:

As noted previously, climate change is global phenomenon and the result of cumulative emissions of greenhouse gases from emissions sources across the globe. Therefore, climate change impacts, including impacts from cumulative projects such as the Dollar Creek Crossing project, are inherently cumulative in nature and discussed above under Impact 3.7-1.

The discussion of cumulative noise impacts on pages 3.8-21 and 3.8-22 in Section 3.8, "Noise," of the Draft EIR is revised as follows:

Construction Noise and Vibration Levels

Impacts related to short-term ~~Project~~Project-related construction noise and vibration levels are localized in nature, based on audibility and distance to sensitive receptors. The proposed Project and Alternative A potential construction noise and vibration impacts are discussed in Impacts 3.8-1 and 3.8-2, above. The construction noise and vibration sources from construction of the proposed Project or Alternative A in conjunction with other cumulative projects, such as the Dollar Creek Crossing project located approximately 1 mile from the proposed Project site and 0.5 mile from the Alternative A site, would not accumulate to cause broader environmental impacts, so by their nature, cumulative impacts would not occur. Therefore, the contribution of construction noise and vibration from the proposed Project or Alternative A **would not be cumulatively considerable.**

Operational Event Noise

Noise generated by outdoor events and gatherings at the Schilling Lodge would primarily influence the immediate ~~Project~~vicinity, as noise levels would diminish at increasing distances from the source. Further, anticipated noise levels from the events would not exceed applicable standards, and therefore, noise levels at increasing distance from the proposed Project site and Alternative A site would be even lower, thus would not combine with other area sources. Further, events at the Schilling Lodge would be infrequent and temporary and would implement Mitigation Measure 3.8-3 that would require amplified noise at events to meet performance standards to ensure that noise levels would be below Placer County noise standards and reduce the impact to a less-than-significant level. Considering the anticipated low noise volumes described in Impact 3.8-3, above, and the temporary and infrequent nature of the events, noise would not combine with noise sources from cumulative projects, including the Dollar Creek Crossing project located approximately 1 mile from the proposed Project site and 0.5 mile from the Alternative A site, to result in substantial increases in noise. Therefore, the contribution from the proposed Project or Alternative A **would not be cumulatively considerable.**

Operational Traffic Noise

Operation of the project would result in additional traffic on local roads associated with events taking place at the Schilling Lodge as described in Impact 3.8-4, above. In the future cumulative scenario, additional growth and development is anticipated associated with the cumulative projects in Table 3.1-2 that would likely also result in additional traffic on local and regional roadways. However, traffic increases associated with the proposed Project and Alternative A are directly associated with the anticipated size of the events being held at the lodge, which would not change in the cumulative scenario. Visitation at the lodge is and would continue to be driven by the cross-country ski trails, use of the trails in the summer, special and other events at the lodge and would not be driven by the lodge itself. Thus, the traffic analysis assumes a conservative 10 percent increase in the daily visitation at the lodge over existing conditions. Additionally, for the proposed Project, there would be a minor change in travel routes for accessing the Schilling Lodge instead of the Existing Lodge, which would redistribute some of the vehicle trips in the Highlands neighborhood. Thus, similar to the ~~p~~Project-level noise analysis for the proposed Project and Alternative A in Impact 3.8-4, ~~p~~Project-generated traffic increases in the future cumulative scenario would not result in traffic noise that exceeds established local standards and would not be substantial such that when combined with cumulative projects such as the Dollar Creek Crossing project a significant cumulative impact would result. Therefore, the contribution from the proposed Project or Alternative A **would not be cumulatively considerable**.

The second and third paragraphs on page 3.9-15 in Section 3.9, "Geology, Soils, Land Capability, and Coverage," of the Draft EIR are revised as follows:

The proposed Project, Alternative A, and many of the cumulative projects, including the Dollar Creek Crossing project, would create additional land coverage within the cumulative analysis area. However, all projects within the Tahoe Basin would be required to comply with TRPA land coverage regulations. In cases where excess coverage is permitted (such as within Town Centers or for linear public facilities, public health and safety facilities, or water quality control facilities), all coverage exceeding the base allowable would be purchased and transferred from within hydrologically connected areas or retired from sensitive lands. In addition, all land coverage within LCD 1b must be mitigated at a ratio of 1.5 acres of restoration for every 1 acre of disturbance (TRPA Code Section 30.5.3).

The proposed Project, Alternative A, and the cumulative projects, including the Dollar Creek Crossing project, would result in grading and excavation, and soil disturbances that could cause erosion. However, all construction projects in the Tahoe Region must meet requirements and regulations of the TRPA, Lahontan RWQCB, Placer County, and federal, other state, and local agencies. The TRPA Code restricts grading, excavation, and alteration of natural topography (TRPA Code Chapter 33). In addition, all construction projects located in California with greater than one acre of disturbance are required, by Lahontan RWQCB, to submit an NPDES permit which includes the preparation of a SWPPP that includes site-specific construction site monitoring and reporting. Project SWPPPs are required to describe the site, construction activities, proposed erosion and sediment controls, means of waste disposal, maintenance requirements for temporary BMPs, and management controls unrelated to stormwater. Temporary BMPs to prevent erosion and protect water quality would be required during all site development activities, must be consistent with TRPA requirements, and would be required to ensure that runoff quality meets or surpasses TRPA, state, and federal water quality objectives and discharge limits. The Dollar Creek Crossing project would be required to comply with the requirements and regulations of the agencies listed above, including TRPA land coverage regulations, and would be required to prepare and implement a SWPPP. Compliance with these regulations and implementation of BMPs as part of the SWPPP would reduce potential erosion and water quality impacts to a less-than-significant level and the project would not combine with other projects to result in a significant cumulative impact.

The third full paragraph on page 3.10-16 in Section 3.10, "Hydrology and Water Quality," of the Draft EIR is revised as follows:

The proposed Project, Alternative A, and the cumulative projects, including the Dollar Creek Crossing project, through construction-related disturbance and increases in land coverage, have the potential to increase the volume of stormwater runoff, thereby increasing the concentrations of fine sediment particles, nutrients, and other pollutants in the surface and groundwaters of the Lake Tahoe Basin. Improper use of fertilizers and snow storage in unprotected areas or in close proximity to SEZs can also introduce pollutants into surface and groundwaters. These potential effects are controlled through compliance with a suite of protective regulations. Any project exceeding one acre in size, which would include the Dollar Creek Crossing project, is required to develop a SWPPP that identifies water quality controls that are consistent with Lahontan RWQCB and TRPA regulations. The SWPPP must include construction site BMPs, a spill prevention plan, and daily inspection and maintenance of temporary BMPs, and post construction BMPs to protect water quality during the life of the Project. In addition, TRPA requires all projects to include permanent water quality BMPs that control sources of sediment and urban pollutants. Any project with a landscape or vegetation component must develop a fertilizer management plan and snow storage areas must be located away from SEZs and equipped with any necessary BMPs. Additionally, because retrofitting existing development with water quality BMPs has been difficult to enforce, water quality improvements are often seen through new development or redevelopment processes where these BMPs are required as a condition of permit approval. TRPA also requires that each project be designed to infiltrate the 20-year, 1-hour design storm event. In special circumstances where this is not feasible, the Project must provide documentation that its stormwater is fully infiltrated by an offsite facility (TRPA Code Section 60.4). Because of the strong protective water quality regulations within the Tahoe region, the potential effects of the proposed Project, Alternative A, and other cumulative projects, including the Dollar Creek Crossing project, would be reduced such that the proposed Project and Alternative A **would not contribute** to the existing adverse cumulative water quality condition.

Response I71-3

The comment states that to satisfy the Project objective to “[c]onstruct a new lodge that minimizes effects on the neighborhood,” the traffic impacts should consider the combined effects of the Project with the Dollar Creek Crossing project. The comment suggests that the traffic analyses should assume two separate scenarios; the first scenario assuming that the Dollar Creek Crossing has no traffic connections to Village Road or the Highlands neighborhood and the second scenario assuming a worst case scenario where the Dollar Crossing Project is connected to Village Drive or otherwise connected to the Highlands neighborhood, allowing the traffic impacts from both projects to combine into significant effects. The comment states that since Dollar Creek Crossing has not committed to a traffic and circulation plan, both scenarios (connection of Dollar Creek Crossing to the Highlands neighborhood and no connection between the two) are reasonably foreseeable and must be studied.

Information concerning traffic generated by the proposed Dollar Creek Crossing project is provided in Section 3.5, “Transportation,” of the Draft EIR, and in the transportation study included as Appendix D to the Draft EIR. (See pages 22 – 28 in Appendix D of the Draft EIR.)

As detailed on page 3.5-32 under the “Cumulative Impacts” section in Section 3.5, “Transportation,” of the Draft EIR, the Dollar Creek Crossing project was included in the future cumulative background traffic volumes used in the cumulative transportation analysis. Additionally, as detailed on pages 3.5-31 and 3.5-32, because the Dollar Creek Crossing project is in the early planning stages specific details regarding the site access were not available at the time of completion of the traffic modeling; and thus, a preliminary estimate of 169 new multi-family residential units was assumed to be constructed, with 50 percent of the vehicle trips to and from the site accessing the property via a driveway on SR 28 and the other 50 percent assumed to access the site via a potential new driveway on Fabian Way, with no direct connection from the Dollar Creek Crossing project onto Village Drive.

Fabian Way does provide access to the Highlands neighborhood, and as shown on pages 3.5-32 and 3.5-33 of the Draft EIR, Project roadway intersections were determined to operate at acceptable conditions under the cumulative scenario. Thus, it is unlikely that distribution of trips from the Dollar Creek Crossing project onto roadways in the Highlands neighborhood from a driveway onto Village Drive would decrease intersection LOS under the cumulative scenario such that the potential cumulative LOS impact would be substantially greater than the cumulative impact analysis in the Draft EIR that had only considered a driveway onto Fabian Way. Under the scenario considered in the Draft EIR that only

looked at a driveway onto Fabian Way from Dollar Creek Crossing, the portion of traffic generated by that project traveling to the schools at the end of Polaris Road could either travel on Fabian Way to Old Mill Road to Polaris Road or could travel from Fabian Way to Village Road to Polaris Road, much like what could occur with a driveway onto Village Drive. Analysis of a scenario that would include a driveway for Dollar Creek Crossing onto Village Road would therefore not likely substantially change the travel routes for vehicles going from the development to the schools at the end of Polaris Road such that there would be a significant cumulative impact on traffic in the Highlands neighborhood. Although additional conceptual plans for the Dollar Creek Crossing are now publicly available that show different access options, including one option showing a driveway onto Village Drive and an option showing driveway access onto Fabian Way and SR 28, it is still unknown which access would be used (Placer County 2020).

The cumulative traffic analysis included in the LSC Transportation Study (Appendix D) analyzed the potential effects of the Dollar Creek Crossing project. This analysis assumed a 169 unit multi-family development with traffic using both a site driveway on Fabian Way between SR 28 and Village Road and a site driveway on SR 28 east of Fabian Way. To address this comment, two additional analyses were conducted. The first analyzed 169 units with 100 percent of access on a single driveway along Village Road north of Fabian Way, and the second analyzed 169 units with 100 percent access on a single driveway along SR 28 east of Fabian Way. These analyses focus on the future summer with proposed Project conditions, as a review of Tables 5 and 6 of the LSC Transportation Study indicates that this is the project scenario that would result in the worst delays.

The key study intersection that would be impacted by the change in access patterns is the SR 28/Fabian Way intersection. This is the case for both scenarios because even if all access were to be provided solely on Village Road, the faster travel times on SR 28 as compared to Fabian Way indicates that Dollar Creek Crossing drivers would continue to use Fabian Way to access SR 28 rather than using Old Mill Road. With all access to Dollar Creek Crossing provided via Village Road, LOS at the SR 28/Fabian Way intersection would be C (16.6 seconds of delay on the worst-movement [southbound]). LOS at this intersection with all access directly onto SR 28 would be B (14.0 seconds of delay). As LOS under all access scenarios achieves the LOS standard, there is no potential for a significant impact on neighborhood access regardless of the access option assumed for the Dollar Creek Crossing (for up to 169 units). The difference between the modeled number of residential units and the most recent available greater numbers of residential units presented in May 2019 and January 2020, is are not anticipated to result in a substantial change in the cumulative traffic analysis such that there would be a change in these impact conclusions.

For the reasons described above, the potential driveway alternatives associated with the Dollar Creek Crossing project would not alter the conclusions with respect to the significance of any environmental impact. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I71-4

The comment states that both suggested analyses discussed in comment I71-3 above, should take into consideration the greater use of Polaris Road compared to Old Mill Road. The comment describes their understanding of traffic patterns in the Highlands neighborhood throughout the year. The comment expresses the opinion that the Dollar Creek Crossing project would contribute new vehicle traffic in the neighborhood. The comment suggests that the traffic analysis should be supported by more recent traffic count studies.

As indicated on page 3.5-1 of Section 3.5, "Transportation," in the Draft EIR, traffic counts were conducted in 2015, 2016, and 2018 to support the traffic analysis included in the Draft EIR.

Please see Master Response 1: Transportation Safety regarding the traffic safety concerns noted in the comment. The comment does not provide any evidence to support the notion that new traffic counts would be substantially different from the traffic counts used for the purposes of the traffic operations analysis. Additionally, since winter counts were used as the basis for the traffic analysis, the impacts of school and other winter traffic are already included, and there have been no substantive changes in the surrounding area that would increase traffic volumes. Therefore, there is no need for new winter counts. Additionally, new winter counts would not be valid due to COVID-19, particularly as the middle and high schools are not conducting in-person classes. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I71-5

The comment suggests that to minimize potential impacts on Highlands residents associated with potential overflow parking, the Project should continue the practice of imposing parking restrictions in the neighborhood.

As described in response to comment O1-3, a detailed analysis of parking supply and demand is contained within Section 6, "Parking Analysis," of the Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR. Additionally, Impact 3.5-4 analyzed the potential for the Project to result in inadequate parking conditions (see pages 3.5-24 through 3.5-27 of the Draft EIR). The parking area at the proposed Schilling Lodge would include a 100-space parking lot, which would provide 54 additional onsite parking spaces over existing conditions (see page 3.5-25 of the Draft EIR). The expanded supply of parking would reduce the potential for spillover effects in adjacent neighborhoods, including the Highlands neighborhood. Additionally, on peak days when parking demand exceeds the parking lot limit, visitors could be directed to park at the Existing Lodge. The impact summary for the proposed Project on page 3.5-27 concludes:

Implementation of the proposed Project would result in the potential for a maximum of seven peak winter days during which residential street parking may need to be utilized. Additionally, residential overflow parking may be required on as many as nine additional days per year during which large special events or premier events would be held. However, provisions to minimize the use of residential parking, such as carpooling, would be incorporated into event planning and implemented. Given that overflow residential parking already occurs during large events at the Highlands Community Center, and that the existing parking lot cannot accommodate existing demand on peak skier days, which already total more than seven per year, implementation of the proposed Project would result in an improvement to existing conditions in the neighborhood as a whole, and therefore result in a **beneficial** impact related to parking.

Furthermore, a maximum number of Large Special Events could occur at the Schilling Lodge (see pages 2-14 and 2-15 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR) and would be reviewed by the applicant for consistency with the Management Plan and attendance would be capped. TCPUD would also review event activity for compliance with the lease agreement. Parking would be managed for these events through a potential agreement with the school and carpooling incentives would be provided, as discussed under Impact 3.5-4 on page 3.5-25 of the Draft EIR (the text in the third full paragraph on page 3.5-25 is edited here to correct a grammatical error and is included in Chapter 2, "Revisions to the Draft EIR," in this Final EIR):

Tahoe XC is hosts to several large annual athletic events, which are generally limited to two or three per season and not more than seven per year. These events can draw an attendance of up to approximately 250 people, including participants, organizers, volunteers, and spectators. In addition to these large athletic events, up to two premier events (e.g., the Great Ski Race) would occur at the site each year, which can draw an attendance of up to about 500 people. The premier events already occur at the Existing Lodge, and no new premiere events would occur as a result of Project implementation.

Parking for both large and premier events would be within the Schilling Lodge parking lot and at the school under the specific agreement described above. Event planning for Tahoe XC must make provisions to avoid substantial overflow parking into the surrounding neighborhood. To this end, carpooling incentives would be incorporated into special event planning and operation and overflow parking on nearby residential streets would not occur during such events.

For these reasons, the Project is not expected to result in significant environmental effects with respect to event parking. Accordingly, there is not a need to mitigate any potential parking impacts that may occur along the streets near the Schilling Lodge. However, it is possible that the kind of parking limitations proposed by the comment could be made a condition of permits required by Placer County or the future land lease or agreement with TCPUD. Whether to adopt such conditions would be a policy matter; such conditions would not be required to address potentially significant environmental effects. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I71-6

The comment asserts that the Project should install curbs, sidewalks, and gutters in the vicinity of the proposed Schilling Lodge to ensure public safety during peak use periods. See response to comment A2-2, which addresses roadway improvements along the Project parcel frontage with Polaris Road or Country Club Drive that would be constructed consistent with the Placer County Design Standards and Guidelines. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Stephanie Schwartz](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Friday, July 24, 2020 4:33:31 PM

**Letter
I72**

To the board members of TCPUD,

I read through as much of the EIR as I could and I strongly believe that moving the Tahoe XC building to the proposed new site on Polaris Rd next to the Middle School and the High School is a completely unnecessary move. In these times in which we are constantly evaluating what is “essential,” I think you must agree at how UN-essential this project is.

I must let you know at this point in this email that I have lived in Tahoe City for 30 years and have lived in the Highlands for 18 years. I am a Nordic skier, a mountain biker and a trail runner. I have 2 teenage children who both participated in the exceptional strider gliders program. In short, I love Tahoe XC and the trails that encompass it. I think that the existing building absolutely needs to be updated and perhaps made a bit bigger. I also understand the need for more parking. I, however, am completely opposed to moving the site to the end of Polaris Rd.

I know it is possible to rework the existing site, get more parking, easier skier access and a renovated building. This idea, by the way, was originally established 5 years ago as what the community in the Highlands wanted/wants.

The final issue, snow pack at the existing site versus snow pack at the proposed sight is almost laughable. I have photos showing that when you see dirt at the existing site, you also see dirt at the proposed sight. In fact, Tahoe XC stops grooming along the trail closest to the High School FIRST!

Relocating the Tahoe XC to the end of Polaris Rd creates enormous traffic problems (as stated in the EIR.) It also puts too many people at the end of a dead end street, endangering lives.

I truly hope you are listening to the concerns of the people who live in the Highlands, the people who will need to live with the unnecessary impacts of this unnecessary project.

Please vote to renovate the existing lodge and work with the existing site. It could really be wonderful!

I72-1

Thank you for your consideration,
Stephanie Schwartz

Sent from my iPhone

Letter I72 Stephanie Schwartz

July 24, 2020

Response I72-1

The comment expresses opposition to the proposed Project located next to the schools. The comment provides background for the letter author related to their experience cross-country skiing and using the trails near Tahoe XC. The comment asserts that relocating the lodge to the end of Polaris Road would create traffic problems. See Master Response 1: Transportation Safety, which addresses concerns related to traffic from the Project. The comment expresses support for Alternative A. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Linda Williams](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Friday, July 24, 2020 5:24:50 PM

**Letter
173**

Dear Kym,

My name is Linda Williams and I am writing to you to convey my strong support for the Schilling Lodge project at the Tahoe City Cross Country Ski Center. As a resident of Lake Tahoe since the early 1960s, I attended Tahoe Lake School from kindergarten through 8th grade and have been an avid alpine skier since childhood. In more recent years I’ve cultivated a love of Cross Country skiing. I have enjoyed the wonderful year round trails of TXC for winter striding, skate skiing and special events, and as a hiker and bike rider during every season. My son, a more recent Tahoe Lake and North Tahoe alum, participated in the Strider Glider program in grammar school and was on the Cross Country ski team in middle school.

The Schilling Lodge represents a “win win” for North Lake Tahoe – both in terms of preserving and repurposing a beautiful architectural building important to Tahoe’s history, but also by providing much needed physical expansion and improvement of the facilities at TXC. Unlike other historic structures preserved as museums, the public will be able to experience this inviting home in much the same way the Pennoyer and Schilling families did. Whether warming up after an afternoon of skiing the trails or sharing stories over hot cocoa or a meal with family and friends, the Lodge will provide a wonderful home base for exploring Tahoe's natural bounty, and for building bonds with family and friends in our community.

The new location for the Lodge affords multiple benefits. Not only does the site cluster several public uses together, but it provides a real asset to the students at both the middle and high school. Adjacency to our educational facilities will allow student athletes to walk directly and safely to their afterschool programs -- to use the team locker room, rent skis, have a quick snack or walk to their Strider Glider lessons (5th graders).

The Schilling Lodge will be an asset to the broader community as well. The aesthetic and layout of the space will offer significant improvements over the existing TXC facilities, including allowing small and medium sized gatherings. Groups like non-profit organization meetings, office Christmas parties, and family reunions will be a perfect fit for the size. A sense of community is built on gatherings like these.

In sum, the Schilling Lodge is a unique, historic treasure to reconstruct for public benefit. I heartily endorse this project for our North Lake Tahoe area and personally look forward to firsthand enjoyment of the “new” Schilling Lodge with family and friends.

Thank you for your consideration.

Sincerely,
 Linda Williams
 P. O, Box 14, Tahoe City, CA 96145
 Cell: 530-388-0537

I73-1

Letter I73 Linda Williams

July 24, 2020

Response I73-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, and expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Julie](#)
To: [Kim Boyd](#)
Subject: Tahoe XC: Opposition to New Lodge
Date: Friday, July 24, 2020 8:11:05 PM

Letter 174

> To the board members of TCPUD,
>

> I have lived in North Tahoe since 1991. I am a Nordic skier, a mountain biker and a trail runner. I have a daughter who participated in the excellent strider gliders program. We love Tahoe XC and the trails that encompass it. I think that the existing building needs to be updated and perhaps enlarged. And also a need for more parking. I, however, am OPPOSED to moving the site to the end of Polaris Rd.

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I74-1

> I have to believe it is possible to rework the existing site: get more parking, easier skier access and a renovated building. This idea was originally established 5 years ago as a community collaboration.

> Relocating the Tahoe XC to the end of Polaris Rd creates traffic problems (as stated in the EIR.) Have you ever dropped your kid off at the middle school at 8:30 on a snowy morning?

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I74-2

> It puts too many people at the end of a dead end street, potentially endangering lives. And now more people will be up there.. with 100+ new kids slated to join North Tahoe HS this fall.

> It also plops a big building in the middle of untouched wilderness. Is this really necessary?

I I74-3

> I truly hope you listen to the concerns of the people who live in our community, the local people who will need to live with the unnecessary impacts of this unnecessary project.

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I74-4

> Please VOTE to renovate the existing lodge and work with the existing site.

>
> Thank you for your consideration, Julie Barnett

Letter I74 Julie Barnett

July 24, 2020

Response I74-1

The comment expresses opposition to the proposed Project located next to the schools. The comment provides background for the letter author related to their experience cross-country skiing and using the trails near Tahoe XC. The comment expresses support for Alternative A. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I74-2

The comment notes concerns regarding Project-related traffic and public safety on Polaris Road. Please see Master Response 1: Transportation Safety regarding the concerns noted in the comment related to congestion and traffic associated with implementation of the proposed Project. Additionally, Impacts 3.5-1 and 3.5-2 in Section 3.5, "Transportation," of the Draft EIR analyze the potential effects of Project-generated traffic within the study area. This comment does not provide specific evidence that the traffic analysis in the Draft EIR is inadequate, inaccurate, or incomplete. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I74-3

The comment asserts that the proposed Project would locate the Lodge in the middle of untouched wilderness. Areas within the Tahoe Basin that are considered "Wilderness" are described in the Lake Tahoe Regional Plan as (TRPA 2012:2-12):

designated and defined by the U.S. Congress as part of the National Wilderness Preservation System. These lands offer outstanding opportunities for solitude and primitive, unconfined recreation experiences, and they contain ecological, geological, and other features of scientific, educational, scenic and historic value. The wilderness designation is intended to protect and preserve such areas for present and future generations. These lands are managed to prevent the degradation of wilderness character. Natural ecological processes and functions are preserved, and restored where necessary. Permanent improvements and mechanized uses are prohibited. Wilderness District lands within the Tahoe Region include portions of the Desolation, Granite Chief and Mount Rose Wilderness Areas.

Thus, the comment is incorrect that the proposed Project would be located on untouched wilderness. The proposed Project site is designated for recreation use (see response to comment I35-6), is located next to urban development (e.g., schools and residences), and the use of mechanized equipment occurs on this land (e.g., use of grooming equipment on the cross-country ski trails in winter). Also see response to comment I35-6, which addresses the land use and zoning designation on the proposed Project site and Alternative A site.

Response I74-4

The comment requests that TCPUD listen to the concerns of the people living in the community. The comment expresses support for renovating the Existing Lodge and working with the existing site. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

July 24th, 2020

Letter
175

Tahoe City Public Utility District
Kim Boyd, Senior Management Analyst
PO Box 5249,
Tahoe City, CA. 96145

To Whom It May Concern,

Please consider this letter as evidence of enthusiastic and unstinting support by the Schilling Family for the joint TCPUD and Tahoe Cross Country Ski Foundation project known as “The Schilling Lodge”.

The refurbishment and repurposing of the old family summer home is strongly consistent with the core values our family has believed in for generations.

My grandparents, who built this home, were avid outdoor enthusiasts, and loved everything about Lake Tahoe. They eagerly shared their love for the Sierras and the abundant recreation opportunities with their family, friends, and guests.

With equal fervor, they supported community involvement, environmental stewardship, and the repurposing of items deemed no longer suitable for their original intent.

My Mother, the late F. Tracy Schilling, knew about the potential repurposing of the home prior to her passing in 2013. She remarked many times on her delight that our home, always a hive of family activity, would become meaningful and relevant to the larger Tahoe community should this project be realized.

Tracy Schilling believed strongly that “Family should be treated like guests, and guests should be treated like family, that way everybody is happy”. She extended that same courtesy to anyone showing up at our front door, and she would be filled with delight to know her belief in the power of a gracious welcome and a plate of freshly baked chocolate chip cookies could extend to the larger community.

The building is ideally suited to accommodate multiple interests and engage many members of the community in a warm and congenial atmosphere.

As the family member tasked with managing the property for the last 35 years of our ownership, I can think of no finer way to honor the building and the intentions of both my family and also of our buyer, Mr. John Mozart.

The stated goal of providing an improved experience for the recreational user while preserving a small portion of the area’s history feels like a worthy and winning combination.

In reviewing the Lodge Replacement and Expansion Draft EIR, I am impressed by the comprehensive scope of the report. Having lived year-round in the Tahoe/Truckee area, the conclusions reached in the report regarding potential impacts feel sound and correct. Proposed mitigations for the identified impacts seem both appropriate, and achievable. The

I75-1

reasoning and methodology used to arrive at various conclusions in the report appear transparent, data driven, and unbiased.

It is my great hope that this project is able to address any remaining community concerns with the care and sensitivity they deserve.

It is my even greater hope that this project moves forward with the sincere support and engagement of the larger North Tahoe Community.

Thank you for your consideration.



Alexandra Schilling Santos
(805) 544-2995
(805) 423-2200
juno57@live.com

I75-1
cont.

Letter I75 Alexandra Schilling Santos

July 24, 2020

Response I75-1

The comment includes background information about the letter's author as family of the original owners of the Schilling residence, expresses support for the proposed Project, and expresses support for the analysis and accuracy of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Terri Viehmann](#)
To: [Kim Boyd](#)
Subject: FW: Tahoe XC Draft EIR Comments
Date: Wednesday, July 29, 2020 4:12:29 PM
Attachments: [image002.png](#)
[TCPUDRecordCorrespondence.pdf](#)

Letter 176

From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
Sent: Friday, July 24, 2020 2:16 PM
To: kboyd@tcpud.com; Dan Wilkins <d.wilkins@tcpud.org>; John Pang <jpang@tcpud.org>; scottzumwalt@gmail.com; Gail Scoville <gscoville@tcpud.org>
Cc: Terri Viehmann <tviehmann@tcpud.org>
Subject: Tahoe XC Draft EIR Comments

We have owned a house in the Highlands for 24 years. Through the years we have observed and enjoyed many projects undertaken by the TCPUD. The taxes we paid here have been well spent in support of a vibrant community. Of the many responsibilities of the TCPUD, the most important is to protect public safety. Unfortunately, the proposed project at Site D is a significant risk to public safety. A project at that location will adversely affect Highlands residents; as well as students, their families, and staff of the High School and Middle School. We hope that the TCPUD in evaluating the application from the TCCSEA will consider their responsibility to protect public safety--despite the DEIR's stated aligned TCPUD objectives with the applicant. And we request that the TCPUD support reasonable modification of the project at Site A to reduce or eliminate the impacts on public safety.

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I76-1
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Site D Proposed Project.

Public safety impacts of project at site D: Residents on Polaris and Old Mill would be immediately affected by increased traffic from Site D. Anyone using those streets, regardless of their residence, will also be endangered. Pedestrians and bicyclists are already at serious risk from the level of traffic on those streets. Adding more traffic to and from Site D will increase danger to drivers, pedestrians and bicyclists. The current Transportation section, upon which a variety of conclusions are based, is inaccurate. **We request that an accurate traffic count of existing traffic on Old Mill and Polaris be included.**

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I76-2
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Traffic safety on Old Mill and Polaris. There are many reported instances of speeding on Polaris and the Transportation section acknowledges the dangerous, icy conditions on Old Mill. Residents have also provided photographs and descriptions of frequent accidents. The Transportation section acknowledges that most GPS systems will direct traffic up and down Old Mill, subjecting drivers to a difficult road, and making use of that road by Old Mill residents even more dangerous and challenging. **The Transportation section must include realistic ways to eliminate this danger. Additionally, a detailed analysis needs to be prepared to realistically estimate the increase in traffic that would be generated by new and expanded activities, including year round activities and programming, and both large or small special events at Site D.**

Alcohol consumption. Alcohol is described in the DEIR as prohibited from sale, but not from consumption. The DEIR describes potential special events large and small that may be allowed at the Proposed Project. These events would generate additional traffic, and drivers and occupants may have been consuming alcohol. Alcohol could be consumed at Site D, adjacent and contiguous with the schools. Not only is this clearly inappropriate, is it legal? **Please include an analysis of the consequences of alcohol consumption at both Site A and Site D. How would controls be enforced? The only mitigation is no alcohol consumption allowed at either Site D or A.**

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Emergency evacuation and access The schools and residents on Polaris have one way in and out in the event of emergency. **Please provide an analysis of how the additional traffic at Site D**

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I76-4
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impacts safe evacuation or emergency services from fire or law enforcement; and how specifically those impacts would be mitigated.

I76-4
cont.

The DEIR makes statements regarding **traffic noise consequences** for Site D and concludes that they are of no consequence and do not require mitigation. **Please provide proof of those conclusions.**

I76-5

The applicant TCCSEA states the following advantages of Site D: higher elevation (less than 100 ft difference), beginner terrain and occasional shared parking with the schools. These potential advantages are outweighed by the severe impacts on public safety outlined above. The location advantages could be provided in other ways.

For example, **a shuttle bus from Site A could provide safe transportation back and forth. We request that this alternative be considered.** The TCCSEA also states that the impacts of warmer weather would be mitigated by a much larger lodge of 10,000 sq ft. While we agree that an improved, attractive lodge with a reasonable amount of parking is a significant enhancement it will not mitigate the consequences of less snow or on its own attract people. **Please provide evidence that an expanded lodge at Site D or A would offset the impacts of low snow and warmer weather.**

I76-6

Site A proposed project:

The project described in the DEIR is a massive increase in size and coverage from the current lodge at that location. The proposed lodge of 10,000 sq ft. and 100 parking places create significant aesthetic degradation and has increased traffic consequences. The increase in size does not provide a community benefit but one that is primarily for the expanded commercial benefit of the applicant. **Please provide explanation of how aesthetics are not adversely affected.**

I76-7

Schilling Lodge Ownership for Project A or D:

Explain how the proposed project would “preserve the financial responsibility and transparency of TCPUD’s property tax funds,” and how a facility designed around the applicant’s own membership/commercial functions qualifies as being for “community use”? **If the project is to be transferred to the TCCSEA, please indicate how use be monitored? How will use decisions be made that do not adversely affect the public safety of the community as opposed to the interests of the TCCSEA?**

I76-8

SUGGESTION: A Modified Site A Project for the TCPUD to consider to eliminate the adverse consequences of the proposals for Site D and A

We understand and support the desire of the TCPUD and the TCCSEA to provide an improved visitor and resident experience. We believe this could be more appropriately and safely accomplished with a **Modified Project at Site A**. Since 2016 residents of the Highlands and elsewhere have requested that the TCPUD consider a Modified Project at Site A. The correspondence from the TCPUD’s own files is attached to this email.

I76-9

The Schilling Residence at its current size of 4600 sq ft or even slightly larger would be a major functional and aesthetic improvement for the TCCSEA, building users and for the adjacent neighbors. It would eliminate the public safety issues generated by Site D. It reduces transportation

impacts , since it is located next to a three season Multi Use trail available to bicyclists or pedestrians and to an adjacent bus stop. The current parking could be expanded by 10 spaces to an increase of 60 paid spaces. Additional offsite parking could be provided by use of Multipurpose trail parking lot (currently 20 spaces). A shuttle could be available to transport visitors arriving by public transportation to Site A. Parking adjacent to the Lodge should only be available on paid basis to encourage use of public transportation and carools. **We request that the an evaluation of a Modified Project at Site A be conducted and included in the EIR** This alternative was rejected by the applicant for reasons, that as currently stated, are inaccurate. **The DEIR section on Alternatives Modified Site A needs to be corrected. An excerpt of the relevant portions of Section 4 Alternatives from the DEIR follows this email. When corrected we request that the TCPUD include a Modified Project for Site A.**

I76-9
cont.

Thank you for your attention,

Bruce and Carol Pollock

FROM DEIR

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. **CP note: this is excerpted to include only the two sites currently under consideration, with an emphasis on Reduced Project Site A.**

I76-10

.. 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*1 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). **Provide data regarding providing utilities, since this would not be necessary on an already developed site.**

I76-11

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

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.

Table 4-1

Site Development Features of Each of the Alternatives

76-12

Item
Lodge ¹
Parking
School Connector
Patio
Kinder Sled Storage
Bike Racks
Yurt
Trees to be Removed
New Land Coverage ⁹
Site Grading/Excavation

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

¹ 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 area of the lodge building combined with the areas containing the extra storage buildings and wax area, but not including the yurt.

² 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.

³ This includes the size of the Schilling Lodge combined with the size of the Existing Lodge. **Why is this combined? Existing lodge to be demolished per writ.**

⁴ Estimate obtained from tree survey data provided by TTCSEA in 2020.

⁵ Estimate for Site A – Modified Project provided by TTCSEA in 2019. **Provide actual data from objective source.** No such estimate was provided for Site D. Estimate of total trees to be removed will be less than for the proposed Project.

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

⁷ 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 Wetlands."

⁸ 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 Wetlands."

⁹ The land coverage estimates are conservative and higher than the coverage that would actually occur with development of each alternative because it includes the area of the proposed Project components. Source: Compiled by Ascent Environmental in 2020.

I76-12
cont.

RECORD CORRESPONDENCE RE THE TXC PROJECT (DEC16-DEC18)

There may be format differences from original correspondence due to conversion of the pdf files used in the TCPUD's official database, which also precluded the legible display of several attachments. The Items are presented in (more or less) chronological order to relate incoming correspondence and TCPUD responses.

On Dec 21, 2016, at 4:46 PM, **Cindy Gustafson responded** (as shown in bold below) to the following questions previously asked of both the TCPUD and TCCSEA by Highlands Homeowner Paul Vatisas:

1. What are the "two originally discussed sites" that Don Heapes referred to in Friday's meetings please? **Don will need to address which sites he was referring to at the meeting.**
2. Residents wish to participate in all formal public processes, so please provide them at least three weeks advance notice of all such meetings and people can arrange their busy schedules to attend. Who is 'on point' for this at the TCPUD, and who should concerned locals contact to get on that list? **Terri Viehmann is the District Clerk and handles all agenda requests. She can be contacted (at the email above) for notification of agendas and workshops related to this subject. The Board will review public outreach related to this subject at the January 20th, 2017 meeting. TCPUD follows the California Brown Act for notification requirements for public meetings. You should also contact Tahoe XC to request notice of any public meetings they will conduct.**
3. What other sites has TCCSEA considered for a relocation of the lodge (e.g., on the School or State Parks property)? What are TCCSEA's stated reasons for wanting to relocate from a site that everyone I know agrees is fine? **This is a question for Tahoe XC and their consultants.**
4. What is the TCPUD's budget for this project (e.g., staff time, analyses, etc.)? How does this break down for Jan-Jun of 2017? Is TCCSEA reimbursing these costs to the TCPUD? **The monitoring of this potential project and possible development of agreements with Tahoe XC has been included in our management goals for 2017. We roughly estimated between 40- 60 hours of management's staff time. Exact cost will depend upon the staff/legal counsel assigned to the review. Reimbursement from Tahoe XC has not been requested. TCPUD has supported the operations of this non-profit (and others such as North Tahoe Arts, Little League, and AYSO soccer) when they are providing recreation services that are within our mission and scope of services since their costs are typically less than TCPUD's costs.**
5. What is the TCPUD's currently proposed budget (if any) for any proposed evaluation, permitting, materials, construction, or any other internal/external/cash costs associated with the new lodge; in 2017, 2018, beyond? **See above (nothing budgeted for future years at this time).**
6. What was the full cost of running the existing facility in the 12 months to end November 2016? **Both Tahoe XC and TCPUD are responsible for costs at the existing site. A joint report would need to be prepared to fully answer this question.**

I76-13

TCPUD will run a report on our expenditures and provide it to you after the holidays.

7. What numbers has TCPUD obtained to reflect the same costs for the proposed new building over 12 months? **TCPUD staff have not spent time on estimating the projected costs for a new building. (We don't feel it appropriate until there is a specific proposal - building size, location, programming, etc).**

8. What other options exist for reducing the current costs (e.g., better insulation), and what is their cost to implement? **TCPUD has not completed an analysis of the options for the existing building. (see next answer)**

9. Has anyone (other than Cindy) raised any issues regarding the cost of the building? **Yes, P&R committee members, staff and Tahoe XC have discussed the long term capital investment required for the existing building/site as we reviewed the scope for TCPUD's P&R Master Plan. This building is being included in our first phase – the Asset Replacement Plan due to be completed in 2017.**

10. Our HOA is one of the regular and frequent users and we have not had an issue with the existing site as is. How can the TCPUD can evaluate a rebuild option without also looking at other actions to reduce the cost of running/maintaining the current building, and without calculating and sharing the ROI from such alternatives? **You are correct that the TCPUD Board will request this type of analysis be done if and when a project is proposed. .**

11. When will all the affected neighbors be notified of any proposed date(s)? **The public involvement/outreach plan for the site analysis is the subject that was requested by our Board of Directors to be brought back for discussion at the January meeting.**

12. What is the plan to contact neighbors who are only in the area part-time? **The public involvement/outreach plan would include this information.**

13 What is the site that Mr. Heapes said in the meeting that the scoring is raising the bar by providing a factual basis for whatever the TCCSEA decides, and is the scoring exercise simply an attempt to force the TCCSEA's preferred site over the general public's clearly stated preferred location? **These appear to be questions for Tahoe XC.**

14. My understanding today is that TCCSEA is the lead on this project, and that the TCPUD is being consulted only as the landowner. Is that correct? **That is correct.**

18. At the previous public meetings, we were told that TCPUD would not be funding the proposed new lodge or its evaluation costs in any way. **The TCPUD Board has approved funding in 2014, (and augmented it in 2016) toward site assessment and public outreach. The total approved was \$13,430.**

On Dec 22, 2016, at 7:29 PM, **DONALD HEAPES** (of the TXC) wrote:

Merry Merry Christmas All. In general, public record of TCPUD Board Meeting contains answers to all questions put forth to me. The January 20 TCPUD Board Meeting is good opportunity for clarification on anything as required. We will be announcing dates soon for a series of 4 Public Workshops between the end of January and Middle of February. We are excited to bring the Community into this effort. As expressed at TCPUD Board Meeting Process. We sincerely feel that is the best forum for discussion and understanding and hope you can appreciate that. Hope Everyone enjoys this wonderful season and look forward to the good efforts we all will make in the New Year.
Respectfully Don Heapes

I76-13
cont.

On Dec 23, 2016, at 7:57 AM, **Paul Vatistas** wrote:

Don, Please can answer the questions. It will take you less than three minutes. :) If in your response you can't say in brief that you support rebuilding on the current site, then clearly TCCSEA does not support that way forward. In your response as is, it also means you are choosing to completely ignore the public feedback that you already organized and received. Your statement in this email "we are excited to bring the Community into this effort" does not help your credibility with the Community. Are you planning to ignore the majority input of future efforts as well?

To the Board of the TCPUD, I will therefore state the obvious. TCCSEA is not being straightforward with the PUD constituents and rate payers in the District, and with the XC Center's neighbors, (and even I now suspect with the TCPUD itself), and therefore we all have a big problem. I am the elected Vice President of our HOA, and will be forced to advocate against any project if TCCSEA is not "playing straight" with our neighbors. As stated previously, my hope is that our HOA can support an extension to and/or rebuild on the existing site (which is likely the cheaper option because of existing, power, water, sewer, and parking, faster/much cheaper TRPA process). I look forward to further discussion on the 20th (and hopefully Don will answer the simple questions before then).

Regards, Paul

From: Paul Vatistas [vatistas@yahoo.com]

January 08, 2017 7:23 AM

To: DONALD HEAPES Cc: Cindy Gustafson Ron Treabess; Jim Robins;
Ray Garland; Judy Friedman

Subject: Re: Responses to some of your questions

Hope everyone had a good start to the New Year! There was some good skiing (downhill and XC) before this rain set in! Don, do you intend to answer any of my questions properly before the meeting on the 20th? I feel that you don't like what you are hearing, so have chosen to just ignore it. Just as I feel that TCCSEA is ignoring all the clear input it received from the community already on site location.

Regards, Paul Vatistas

From: Paul Vatistas [vatistas@yahoo.com]

January 10, 2017 5:19 AM

To: Terri Viehmann Cc: Cindy Gustafson Subject: Re: 2017 - TCPUD Board and Committee Meeting Calendar ,

Ray tells me that the XC Lodge has been pulled from the Jan 20 Board meeting. **Is that correct?** Any information would be welcome as I plan work commitments around your meetings when I need to attend.

Regards, Paul

On Jan 10, 2017, at 7:52 AM, **Cindy Gustafson** wrote

Hi Paul – TXC has requested not to be on the agenda until after public workshops have been held. That request was made last Saturday. I will be reporting that to the Board of

I76-13
cont.

Directors under my GM Report (no discussion) but there won't be an item on the agenda until February.

From: Paul Vatistas [vatistas@yahoo.com]

January 10, 2017 10:23 AM

To: Cindy Gustafson Cc: Terri Viehmann; Judy Friedman

Subject: Re: 2017 - TCPUD Board and Committee Meeting Calendar

TCCSEA needs to be more up front and proactive. They notified Ray about the meeting but did not notify me or others whose emails they already have. It is almost as if they would prefer we do not attend! Can you ask Don please to build and use an email list for all folks who have expressed interest in keeping updated? I would ask him myself, but he just ignores my emails (which seems like bad PR to me, but these are his choices). Also, all the meetings are scheduled for the Fairway Center. It seems that at least one and maybe two should take place at the XC center(?) Again, it is almost as if they do not want to engage with the Highlands. I feel the TCPUD cannot engage with TCCSEA if they are just on an agenda and not really interested to listening to others.

Finally how are TCCSEA or you going to engage with affected homeowners like Paul Niwano and Debbie White who are currently gone for Jan and Feb? My wife or I have been out on the trails every day this year. Whether the XC center is open or closed, grooming or not. Most of the people we meet out there are local. We talk and they are all (so far) happy with the XC center where it is. Thanks to you for the response (and I feel compelled to note given TCCSEA's lack of performance that you are very good at turning around in less than 48 hours, which I do really appreciate).

Regards, Paul

On Jan 10, 2017, at 7:21 PM, **Cindy Gustafson wrote:**

Hi Paul – With this email I am passing this on to Tahoe XC for consideration on their outreach process. Certainly our Board will be reviewing their process in soliciting public input when determining any future actions. Thanks and stay safe out there – it is really a mess.

From: Paul Vatistas [vatistas@yahoo.com]

January 12, 2017 4:51:19 PM

To: Cindy Gustafson

Cc: Terri Viehmann; Judy Friedman - Paper Trail (judy@tahoepapertrail.com); DONALD HEAPES; Jim Robins

Subject: Re: 2017 - TCPUD Board and Committee Meeting Calendar Date: Thursday, Thanks. But this does not seem right. I think the TCPUD needs to lead the process for what is best for PUD land and property, and actually cannot delegate that responsibility to two random citizens. I will send you some more detail on the issues when I have time over the next two days. TXC is a private entity looking to build a commercial building on TCPUD (public) land. TXC is a winter tenant and one of at least three other entities that regularly use the existing facility (of which one is our HOA). TXC is just one of your tenants, and the other two (at minimum) need to be actively included. The TXC Board is not elected by anyone and is not an agency or Committee of the TCPUD. So basically 3-5

I76-13
cont.

individuals have come to you with an idea, and the PUD have not yet set up a real and inclusive committee or public group. I would recommend this process be led by the Parks and Rec committee. Again, I will send you a more thorough email when I have time.
Regards, Paul

From: Roger Huff (huffmtry@aol.com)

January 21, 2017 8:29:09 AM

To: Cindy Gustafson; judy@tahoepapertrail.com; Ron Treabess; Terri Viehmann Cc: raygarland2@gmail.com; vatistas@yahoo.com; racswift@gmail.com;

Subject: RECORD COMMENT ON TCCSEA'S PROPOSED PUBLIC INPUT PLAN
Greetings, As one of those very interested people who could not attend yesterday's Board meeting, I watched it on video that evening. After evaluating the comments and concerns expressed about this topic, I respectfully request that the following be added to TCPUD's record file:

I strongly recommend that the TCPUD Board NOT endorse the TCCSEA'S proposed public input plan because: - The extremely late and limited dissemination of public notification about this weekend's "workshops," the refusal to postpone them when a Winter Storm Warning tells people to stay home, and proposing the only other sessions during major winter weather months; collectively could be interpreted by some as an attempt to limit public input, and - Holding information forums before TCCSEA is prepared to properly address obvious public concerns about: addition of additional candidate sites beyond the two previously presented; footprint diagrams of buildings, parking, ingress/egress roads, equipment yards, etc. for all candidate sites; and questions regarding the proposed site scoring method would be premature and of limited value as a TCPUD decision basis

I would like to see this project succeed for the benefit of our community, the Highlands homeowners, and all users of this public property including the TCCSEA.
Regards, Roger.

From: Paul Vatistas [vatistas@yahoo.com]

January 30, 2017 6:18 AM

To: Cindy Gustafson Cc: editors@moonshineink.com

Subject: Moonshine Ink article re Schilling Lodge

In their recent article about the Lodge, This seems to be the opposite of what the PUD has stated in its public meetings. "Tahoe Cross Country plans to rebuild the lodge in the Highlands neighborhood outside of Tahoe City in partnership with Tahoe City Public Utility District" In the public meetings that I have attended, Board members and you stated several times that this is a TCCSEA initiative and not a TCPUD initiative. Please can you clarify whether TCPUD is a partner with TXC and/or TCCSEA, in both a general and legal sense. Thank you.

Regards, Paul

From: Paul Vatistas [vatistas@yahoo.com]

January 30, 2017 1:14:47 PM

I76-13
cont.

To: Cindy Gustafson Cc: Ron Treabess; Judy Friedman; Terri Viehmann
 Subject: Highlands Community Center options

Per my public comments today, please find attached details of the items mentioned. I noticed that the meeting was not recorded, so ask that my comments be included in any minutes of today's meeting. Thanks! I believe that it would be helpful to have an agenda item at the March Board meeting to address these important issues. regards, Paul

COMMENTS TO TCPUD Issues related to Highlands Community Center, associated TCPUD land, and proposed Schilling Lodge. January 30, 2017 At the last meeting I requested that there be a separate Board agenda item to review options (beyond the Schilling Lodge) and issues for the Highlands Community Center. I would like to elaborate here on some of the issues that face the TCPUD.

1. Building options. If the Highlands Community Center (HCC) needs additional space, then how much will that cost in the current location? Estimate \$250/sq ft, so maybe only \$250k for each extra 1000 square feet. This seems much lower than building a new Lodge, and should be evaluated using some actual figures. Knowing the costs of a remodel or extension is important as a baseline for financial comparison with other options such as the Schilling Lodge. IF the HCC needs additional parking, that how much will that cost in the current location? Estimate \$3 sq ft, so maybe \$1,000 per parking space (with shared component). Best practice would be to quickly cost out total of 60, 80, and 100 parking spaces, in the current location. Knowing these costs would be useful as a baseline for comparison with other options.

2. Zoning. HCC is supposed to be a meeting center for the community, and not a commercial building. However Tahoe Cross Country (TXC) has been using this building to run a commercial operation for several years now: • Charge for access to the general public • Charge for waxing equipment to the general public • Sell clothing to the general public • Rent out bikes to the general public These are all clearly commercial activities. To my knowledge this part of the Highlands is zoned Residential, and not commercial. The only zoned commercial area that I am aware of is at the corner of Fabian and Highway 28. It seems important that the TCPUD seek out and know zoning for the Highlands area before making any decisions, and share that information with the public.

3. Different rental fees. Pricing from the TCPUD for the HCC has not been the same for different users, and TXC seems to have been given a very favorable deal. • Community members are charged \$97/hour for building rental, minimum 2 hours. • The XC Center has only been charged \$1/year, plus a percentage of revenue. No other user (e.g., Scouts, Highlands HOA) has been offered this very low rent. Quoted TCPUD rental rates are here. http://tcpud.org/assets/highlands_community_center_rental_rates_form.pdf Knowing whether this discriminatory pricing creates a legal problem, and whether the TXC or TCCSEA lease therefore needs to be amended to provide fair pricing, would seem to be important.

4. TXC is in clear breach of the IRS and State of California requirements for a 501(c)7, and has been for many years. • Charge for access to the general public • Charge for

I76-13
 cont.

waxing equipment to the general public • Sell clothing to the general public • Rent out bikes to the general public Since taking effective ownership of TXC, TCCSEA may also be in breach of IRS and State of California requirements for a 501(c)3. Knowing whether TXC and TCCSEA are operating illegally would seem to be of interest to the Board and the public.

5. TCPUD commercial partnership. Given that the TCPUD is getting a percentage of TXC and/or TCCSEA revenues, does that mean that (intentionally or otherwise) that it has become involved in a pure commercial activity at a site that is not zoned for commercial activity. While the TCPUD clearly charges directly for water and sewer, there may be limits to engaging in commercial activity like selling sporting clothing to the general public A legal opinion on these issues would seem appropriate and helpful to both the Board and the public

6. Options currently being evaluated by TCCSEA are missing one key alternative. TCCSEA rationale for the Lodge is that it claims that it needs additional space to expand its activities, grow its customer base, and grow revenue. As stated above, all of this sounds like commercial activity. I attended the January 21 TCCSEA workshop and found it very helpful. As you know, the TCCSEA is undertaking a process to evaluate 5 options, all of which presume that the cross-country center operation needs more space, and therefore needs the Schilling Lodge. However none of these options reflect what the public asked for 2 years ago. The public asked for a layout that most closely matches Option A but with the Lodge on the north side - i.e., demolish the current building and replace it with only the 4000 sq ft Schilling Lodge. This is not reflected in the 5 options that TCCSEA has proposed to date. The TCPUD should be sure to include and review his option (let's call it A-2) as part of its own evaluation process.

7. ADA issues. Both non-profits and public utility districts are subject to the Americans with Disabilities Act. The proposed new Lodge has 2 stories. Has anyone established if it is ADA compliant. It seems that the Board should have available its own legal opinion on this.

8. Responsibility for current building. At the workshop, I asked what was going to happen to the current community center if there was a new Lodge. Don Heapes told me they would not need it if there were a new Lodge, so "it would be the TCPUD's responsibility", and that I "should ask the PUD". It would seem appropriate for the TCPUD to describe its plans for the current lodge if the Schilling Lodge is built (e.g., maintain as is, demolish, other). It would also be relevant to have estimates of what it will cost to operate and maintain the current community center, and to have estimates of what it might cost to demolish this building. And who will be paying those costs?

For all the reasons that I have laid out above today, I request again that the Board set an agenda item for its March Board meeting to cover, at a minimum, all these issues.
Thank you, Paul Vastistas Tahoe City resident

I76-13
cont.

On Jan 31, 2017, at 7:55 AM, **Cindy Gustafson wrote:** Hi Paul – thanks for coming to the workshop yesterday. In response to this email I have asked Terri to send you a copy of the Letter of Intent TCPUD entered into with Tahoe Cross Country Ski Education Association. She will also forward you a copy of our Public Records Request form so we can accurately track and respond to your requests. In response to Kerry and your later emails, I have forwarded to our legal counsel for interpretation on the limitations for use of the property under our agreements. I will ask him to prioritize a response as soon as possible.

Thanks, Paul

From: Roger Huff (huffmtry@aol.com)

February 01, 2017 8:18 AM

To: Cindy Gustafson ; judy@tahoepapertrail.com; Ron Treabess ; Terri Viehmann

Subject: TCCSEA SKI LODGE PROJECT CONCERNS

Good Morning, We attended the 2014 TCCSEA presentation and like a number of other attendees, expressed our support for erecting the original historical building at the present site. After reviewing information on www.theschillinglodge.com Web site yesterday, however, we were extremely surprised to discover that:

- a. The TCCSEA has unilaterally added more candidate building sites, several of which would have very significant adverse impacts on the Highlands; and
- b. The TCCSEA now also proposes to expand the original structure by 3,100 square feet to accommodate their members and commercial operations.

The reason for TCCSEA's delayed revelation of these significant and controversial changes to Highlands homeowners and the general public is at least questionable, and raises other concerns about its motivation for the following: Because a substantial number of Highlands homeowners are part-time or seasonal occupants or are unable to attend local "workshops" due to other commitments, the TCCSEA's public input plan is inadequate, and limiting such events to Tahoe's three principal winter weather months would skew inputs in favor of those more likely to be represented (e.g., TCCSEA Members).

The latter is particularly concerning because comments made by the TCCSEA on the aforementioned Web site reveal its definite bias against the present Cross Country (XC) Center site. As the TCPUD's General Manager has already noted, TCCSEA's public input schedule seems overly ambitious and unrealistic; and some are concerned it may be an effort to drive the Board toward a site decision based on incomplete or artificially biased information.

There are also concerns regarding the objectivity, validity, and thoroughness of the TCCSEA's site scoring effort; because: professional expertise of some scorers hasn't been established, the TCCSEA is obviously biased (see Item #2 above), the scoring criteria haven't been described, data sampling times and methods are unknown, and several

I76-13
cont.

critical evaluation areas (e.g., impacts on private property values, additional emergency evacuation route congestion) are not properly addressed.

The current facility is used for local boy scouts, Highland Homeowners' Association meetings, etc., but the modifications and additions proposed by the TCCSEA focus narrowly and almost exclusively on serving its members and commercial operator. The TCPUD can't let myopic self-interest drive this, and must base its decision on what is best for quality of life and safety of our Community, not just the TCCSEA.

Such behavior has resulted in loss of confidence in and respect for the TCCSEA. While we still support a less ambitious effort to erect the originally-sized historic building at the present XC Center site to benefit our community without adversely affecting the private property owners, we must emphatically ask the TCPUD Board to reject TCCSEA's current proposal.

Unless all major stakeholders act in good faith, continuing down the current path would be a serious, costly, and divisive mistake.
Very sincerely, Roger Huff

From: Alex Lesser [alex@pssclabs.com]

February 01, 2017 8:25 AM

To: Cindy Gustafson Subject: Concerns About New Cross Country Lodge Hi Cindy: My name is Alex Lesser. I am the owner of the property at 3061 Polaris Road. I want to voice my extreme concerns about the possibility of moving the site of the Cross Country ski lodge from it's current location. I don't understand why the current location is not suitable to simply rebuild the lodge. All of the current infrastructure on that site can be rebuilt. I have seen that there is a possibility of moving the lodge in back of my property which concerns me greatly. I have two young children that I do not want around this building site and have concerns about the increase in traffic. In addition, this area is a natural thoroughfare for wildlife. Building on this location would be extremely harmful to our environment and negatively impact our neighborhood. Also, I believe maintaining a lodge size of 4,000 sq. ft. makes the most sense. Expanding to a 7,000 sq ft lodge does not seem necessary. Please contact me with any additional information you have about the potential site location.

Alex Lesser

From: Paul Vatistas [vatistas@yahoo.com]

February 01, 2017 11:38:44 AM

To: Cindy Gustafson; Terri Viehmann:

Subject: Fw: Highlands 2014 Fall Newsletter

Hi, Cindy. Stumbled on this email while looking for something else - it was sent out just after the September 2014 meetings. The XC Lodge update reflects exactly what happened, and was written up at the time by Ray. This is why we all feel that Jim "moved the goalposts" on everyone in the fall of last year. I stumbled on some other emails on this topic, including interestingly one from Jim to you, Bob and Matt at the TCPUD, and cc'd to Kevin, sent on August 15 2014. In it he says, "We feel the existing site would

I76-13
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make the most sense ". So the community memory and your written record of what was agreed at the time is exactly as I stated at your December 2016 Board meeting. I would like to point out that I bet you did not receive a single phone call or email from any member of the public regarding the Lodge from October 2014 until October 2016, or until just a couple of months ago. Why? Because the public was happy with what had been agreed.

Regards, Paul

Highlands Home Owners Association Fall 2014 Newsletter excerpt:

FOLLOW UP ON THE TAHOE XC SKI LODGE There was excellent participation in the Open Houses hosted by TCPUD on September 11 and 13 where residents were encouraged to note what they wanted to see and what they did not want to see for the relocation of a donated 4,500 square foot ski lodge. According to Kevin Murnane of Tahoe XC, as a result of the public comments and other internal discussions with the Tahoe XC Foundation, the focus is on the current location on Country Club Drive. Any thoughts of putting it elsewhere in the XC area are no longer being considered. The next step is for the TCPUD Parks and Recreation committee to contract for a feasibility study. The ski lodge will remain standing in its current location on the west shore through this winter. The lodge will then be dismantled and stored and funds need to be raised. Consequently, there are plenty of additional steps that must be taken and Kevin estimates "it might take a few years" before the restored lodge becomes a reality.

From: Rachael Swift [racswift@gmail.com]

February 03, 2017 1:45 PM

To: Cindy Gustafson ; judy@tahoepapertrail.com; Ron Treabess; Terri Viehmann

Subject: Tahoe Cross Country TCPUD - Schilling Lodge Concerns

Dear Cindy and Fellow Members of the TCPUD, As Highlands' residents, we were alarmed to learn of TCCSEA's recent recommendation that several alternate building sites to the existing site on Country Club Lane be considered for a new and much larger skiing facility. Shortly after we purchased our home on Polaris Rd. in 2013, we learned about the donation of the Schilling Lodge to the Tahoe Cross Country Center. Everything we heard or read about this donation indicated that the Schilling Lodge would replace the existing lodge at its current location - which we supported then and now. Specifically, refer to the "2014 outreach to the Highland Homeowners Association" as reported in the 2014 Highlanders Homeowners Association Fall Newsletter by Ray Garland, President of the Highlander Homeowners Association: "There was excellent participation in the Open Houses hosted by TCPUD on September 11 and 13 where residents were encouraged to note what they wanted to see and what they did not want to see for the relocation of a donated 4,300 square foot ski lodge. According to Kevin Murnane of Tahoe XC, as a result of the public comments and other internal discussions with the Tahoe XC Ski Foundation, the focus is on the current location on Country Club Drive. Any thoughts of putting it elsewhere in the XC area are no longer being considered."

To now learn that, our input has been thrown away and a new potential site analysis has been resurrected, with strong bias against the existing site as originally communicated, is

I76-13
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a great cause of concern. (refer to: “What’s wrong with the current TXC lodge facility?” at the FAQ at www.theschillinglodge.com) . We are very concerned that changing the Tahoe XC site to another location as the current communication suggests would have a significant and adversarial impact on the Highlands community, of which they have asked for and received support from on a regular basis.

We believe it is extremely important for the TCCSEA and the TCPUD maintain a strong, open, honest relationship with community based on trust and good will. In 2015, when the Tahoe Cross Country Center fell on hard times after years of low snowfall, it appealed to the community for financial support to continue its very existence. We responded by making a substantial financial contribution. We made this contribution in good faith because we believed TXC benefits the community and the neighborhood. However, TCCSEA’s new proposals to significantly increase the size of the lodge and to relocate the lodge would be a significant change and cause much adversarial impact to the Highlands homeowners and community, changing existing traffic patterns and substantially changing the character of our residential neighborhood.

As homeowners, voters, contributors, and taxpayers, we support keeping the Tahoe Cross Country Center at its current location. The infrastructure for the facility is already in place there and the close-by neighbors are accustomed to the proximity, operations, traffic, other issues associated with the facility. The TCCSEA and TCPUD need to reflect on the importance of having an open, honest relationship based on good will and trust with the community it serves. We supported the TXC Center when it asked us for help in a time of need. Please do not breach this trust by moving this facility and adversely affecting our neighborhood.

Rachael and Bill Swift

From: Bonnie Dodge [bonniefir@icloud.com]

February 12, 2017 8:12 AM

To: Cindy Gustafson

Subject: Schilling lodge

Cindy, I've only recently become aware of the proposed changes to the Tahoe city cross country center and the Schilling lodge project. After briefly reviewing the proposed sites for the reconstruction of the schilling lodge, I can't help but ask why they wouldn't just take down the "inadequate" facility on country club and put the schilling lodge there? That is where folks are already used to the increased traffic flow and parking issues, and where people looking for biking/hiking/nordic skiing access are used to going. Traffic on Polaris is already maxed because of the high school and middle school daily school and events. I don't really understand the scoring cards and who is doing the scoring at all. I'm going to try to come to the forum/open house this afternoon. I know you are probably too busy to reply to individual emails, but just wanted you to know that as a full time resident living on Polaris I am opposed to anything that would increase traffic on our already busy street. And, in the case of the cedarwood site, construction would completely alter the natural beauty of our backyard and, most likely, decrease my property value. We bought this house largely because it backed to natural forest. Having a lodge/parking lot in the backyard would have been a deal breaker if it existed at the time.

I76-13
cont.

Hope to see you this afternoon, Bonnie Dodge

From: "Ray Garland"

February 21, 2017 12:43:20 PM PST

To: Cindy Gustafson

Subject: FW: Concerns about the move of the Nordic Center

Hi Cindy, I responded to this message by suggesting Sheila write directly to you but in case she doesn't I thought you should have this.

Ray

From: Sheila Cepero [ceperowall@yahoo.com]

February 20, 2017 5:19 PM

To: raygarland2@gmail.com Cc: Niall Wall ; Sheila Cepero

Subject: Concerns about the move of the Nordic Center

Hello Ray, My name is Sheila Cepero. My husband Niall Wall and I own the home at 3012 Highlands Dr. We have been informed by our neighbors that there is a proposal to move the site of the existing cross country center. We are unable to attend the meetings but want to convey our opinions and our concerns. We are concerned about the impact to the environment and to our neighborhood. We love the cross country center but we believe that the ideal situation is to make improvements to the existing location even if it is more expensive initially as we think the long term impact to the forest and the neighborhood if moved is more consequential. But if it has to be moved then I believe that the locations near the High School, Sites C and D are the best alternatives, definitely not the end of a cup de sac on our quiet Highlands Dr. street. Please let us know if there is another person/entity that we should be communicating our concerns to.

Thank you. Sheila Cepero and Niall Wall

From: Rachael Swift [racswift@gmail.com]

February 25, 2017 11:57 AM

To: Cindy Gustafson ; judy@tahoepapertrail.com; Ron Treabess ; Terri Viehmann

Subject: TCPUD/TCCSEA Schilling Lodge Public Input Request

Dear Cindy and Members of the TCPUD, We attended the workshop at the Fairway Community Center on Saturday, Feb. 11 and came away from this event with many deep concerns that I have highlighted below.

The bulk of these concerns stem from what appears to be a decision by the TCPUD to instruct the TCCSEA to "exclude" from the discussion the option that most of the Highland's homeowners believed was the working plan of record and what would have the least amount of impact to the neighborhood and the community, - and instead to just focus on a narrow agenda of building a very large, year round commercial enterprise in the Highlands with little regard for how this would affect the people who live there.

We ask that the TCPUD "modify" this ongoing public discussion to "include" the option of upgrading the existing facility in its current location as the needs of the Highlands community and the families who live there must be part of this discussion. This will help

I76-13
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to maintain strong and open communication and trust with the TCPUD and the community.

At the Feb. 11 workshop, one board member told us that the donor of the Schilling Lodge had put up \$1 million dollars to reconstruct the lodge for the TXC center, and that this person has lots of rich friends who are willing to kick in big money as well. Therefore, it will not be necessary for the TCCSEA to go around the community raising “bake sale” money for this project. As neighbors and donors, this is very offensive. It shows that the TCCSEA does not feel that it needs neighborhood support. Very disturbing! A board member told us that it is important that the new lodge be a year round commercial establishment in order to generate a revenue stream in low snow years. However, he had no concern at all about the noise, increased traffic, or public safety issues this would create for the neighborhood. We know several families in the Highlands who have children who attend the high school and who live close enough that their children should be able to walk. However, these parents drive them to school because of speeders, heavy traffic volume, and no sidewalks.

Most people driving to and from the high school on Polaris Rd. travel well above the speed limit. When I pointed out this speeding issue to a board member, he replied that I should “notify the proper authorities about that”. In other words, that is your problem, not ours. A new lodge with 100 parking spots would make this situation much worse. Currently there are quiet times in the Highlands when there is very little traffic – weekends, holidays, and in the summer. A year round commercial establishment would take this away and put heavy traffic on its roads 24/7 all year round. This affects property values, public safety, and the quality of life for its residents.

Is the Highlands even zoned for a year round commercial establishment? We would be very interested to see this specific language in the zoning codes. One board member told us that the new lodge would not sell alcohol, but it would allow alcohol to be brought in for special events. Are you kidding? This is exactly what the Highlands does NOT want – especially in a building in such close proximity to a school.

After speaking with several neighbors and friends in the Tahoe City area, we have found that most people have very little knowledge that this process of expanding and relocating the TXC lodge is even going on. One neighbor told us that she did get a post card in the mail about the Schilling Lodge, but she tossed it because she did not know what the Schilling Lodge was. Another told us that when she saw this post card she also tossed it because she thought this issue of replacing the existing lodge with the Schilling Lodge had been decided 2 years ago – so why should she go to a workshop? If there were instead, - mailings, signage, and advertising that said “Come and Learn about Plans for a Massive Expansion and Relocation of the TXC Lodge” – people would understand what is really going on and take an active interest in this process. You will get real feedback, not carefully controlled feedback. In addition, many homeowners in the Highlands are second homeowners. They do not check their post office boxes often and they are not around to see the few posters that have been put up in town. They come to Tahoe to relax, not to go to workshops. Most of the second homeowners in the Highlands have no idea

I76-13
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that this process is even going on, and if they did, they would be horrified. In this heavy snow winter, it is difficult for second homeowners to even travel here.

The TCPUD, through its instruction to the TCCSEA, and the TCCSEA is not being open and transparent with the community about what it is really trying to do. Our personal opinion is to keep the TXC lodge where it is and scale it down! This is what was agreed to in 2014 by the Highlands community and the TXC board. That said, we believe it is more important that TCPUD modify the existing site selection process to include the option to upgrade the existing site, as that is what the majority of the community believed was the operating plan of record. In that way, the community, TCCSEA, and the TCPUD can have a more fair public dialog, and from that we believe what is best will result.
Bill and Rachael Swift

From: Cindy Gustafson

February 25, 2017 4:24:58 PM

To: Rachael Swift

Cc: Terri Viehmann

Subject: RE: TCPUD/TCCSEA Schilling Lodge Public Input Request Date:

Thank you Rachel. I will pass your comments on to the Board and Tahoe Cross Country Ski Education Association. They will be considered in our future deliberations on this issue.

From: Roger Huff (huffmtry@aol.com)

March 11, 2017 5:52:31 AM

To: Cindy Gustafson; judy@tahoepapertrail.com; Ron Treabess Cc: Terri Viehmann

Subject: CONFLICT OF INTEREST WAIVER REQUEST AGENDA ITEM

The requestor is a respected area law firm, but I am very concerned granting this waiver would needlessly put the TCPUD in a vulnerable position due to current controversies.
Regards, Roger

From: Debbie White [debbie@mrooms.co.uk]

March 12, 2017 11:51:13 AM

To: Cindy Gustafson; Terri Viehmann; Bob Bolton;

Subject: Schilling Lodge input Cindy/Terri

Afternoon. Further to my emails on the above subject, at the workshop yesterday (Saturday 11th March): a) people were verbally told that the placement of the lodge was (quote) "a done deal and it will be going by the school". b) it displayed all the scores on the wall that showed the school site as being the best location. This so called democratic process of having workshops and information gathering, question answering and open discussion with the public seems totally corrupt.

The process is broken, biased, unfair and cannot be trusted. None of the criteria on the score cards are actually asked on the questionnaire on the website so how have the current total scores been established? Why would you publish information that is supposed to be assemble first, review later, issue results? Not show them as you go. And how are they established? Having 1 as the preferred site and 5 the least preferred is

I76-13
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grossly misleading in my opinion. I'm confused when I read the website. In my mind the higher a score in any points based system is the winner, not the loser. So is this part of a plan to mislead people? I'm beginning to think it is. When I see, for example, 'minimum changes to current trails' Existing site 5, Highlands & all other sites 1, how was that score established. I think the criteria should be published so we all know.

I am not in Tahoe this winter but will be back in the summer so how can I be part of this as an absent homeowner, especially this winter? The website is insufficient to consider it the solution as it doesn't go deep enough. I can't be there to discuss the fact I don't feel the existing site should be the least attractive site and to say in my opinion there is actually no changes needed to current trails if the lodge goes on the current site. I will have to sit down and write another email giving my input on the 35 points based criteria in order to register my thoughts. I then hope they can be part of the totals.

A TCPUD member should be the unbiased, neutral party to manage this. It is apparent and fact that locals to the Highlands are too scared to comment and they don't want to speak out for fear of future repercussion or bias. This is because people know the TC personnel too well. It is not a fair process and there is equal fear the information gathered will be filtered. I feel judged by the very first question on the website. I'm not in Tahoe this winter so I'm not a XC member, I'm also not a pass holder and it asks how many members of the family are. Why is this relevant? Please, please review this process or it could turn out to be an unethical mess.

Thank you for your time. Debbie White

From: Alex Lesser [alex@pssclabs.com]

March 13, 2017 1:44 PM

To: Cindy Gustafson

Subject: Acting in Good Faith

Acting in good faith is defined as "honesty, fairness, absence of intent to defraud, act maliciously, or take unfair advantage." It's part of our laws, a fundamental presumption in our contracts, breaches have led to lengthy legal actions and costly judgments, and evidence of repeated failures warrants serious concerns.

Since presenting its Schilling Lodge project to the Tahoe City Public Utility District (TCPUD) Board and Highlands homeowners, the Tahoe Cross Country Ski Education Association (TCCSEA) has:

(1) Blindsided Highlands homeowners with its unilateral changes of plans to: a. Expand the structure from 4,200 sq. ft. to 7,300 sq. ft. to provide spaces for the TCCSEA, ski team members, and its commercial operations; b. Add three more candidate sites to the two originally presented, without effectively notifying the potentially affected Highlands property owners; c. Include parking for at least one hundred cars and several buses, and eliminate the choice of an originally-sized project from consideration;

(2) Neglected to mention the fact that in 2014 a large majority of Highlands residents expressed their strong preference for an originally-sized project at the current site;

I76-13
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- (3) Revealed its bias against the current site on www.theschillinglodge.com Web site, raising questions about the objectivity and credibility of its site scoring efforts;
- (4) Put its members and associates on its site scoring team, instead of residents who know more about the impacts of the sites and whose daily lives are most affected;
- (5) Failed to effectively notify seasonal residents and scheduled local workshops in Tahoe's major winter weather months, which limits their participation and inputs;
- (6) Altered public questions to omit key points of concern without permission, then claimed its modified versions were Frequently Asked Questions (FAQs); and
- (7) Tried to force public input through the Questionnaire on its Web site where it can control information; and encourage decision-makers to trust a site scoring team that is weighted with people who support its agenda.

Most people would not use terms like, "honesty, fairness, absence of intent to defraud, act maliciously, or take unfair advantage" to describe such a pattern of behavior. In the Letter of Intent, the TCPUD promised to "act in good faith"; but the above indicate this may not be the case for all parties, and raises extremely serious credibility questions.

Alex Lesser

From: harry taylor [harrytaylor58@hotmail.com]

March 13, 2017 9:31 PM

To: schillinglodge@tahoexc.org; Cindy Gustafson

Subject: Schilling lodge To: schillinglodge@tahoexc.org Cc cindyg@tcpud.org Re: Schilling Lodge I am a resident of Dollar Point and a user of the Highlands Park on a fairly regular basis. I am writing directly to you via email rather than using the web form, because I am not sure where the web form ends up. I am keen to see the TCPUD work for and with its District voters, and the wider regional community, including me. What is your current address or neighborhood? Dollar Point Check all that apply to you: Part-time resident yes Cross-country skier yes Hiker yes Mountain biker yes Would you like to stay informed? No Email address: harrytaylor58@hotmail.com Please circle your preferred location Option A What positive attributes does your preferred site have? Closest to highway 28, minimizes traffic impact Minimum environmental impact. Will be lower costs than sites requiring new roads. Keep everyone's taxes and rates down. Reduces traffic risks to schoolchildren in the area All the existing residents are used to it being there, so best place for it What are its potential downfalls? None .
Regards, Harry Taylor

From: Debbie White [debbie@mrooms.co.uk]

March 14, 2017 5:47:31 AM

To: Cindy Gustafson; Terri Viehmann

Cc: schillinglodge@tahoexc.org

Subject: TCCSEA annual public meetings not held to date

I76-13
cont.

Cindy/Terri Afternoon. I understand that under the current lease agreement with TCPUD and TCCSEA, annual review meetings should have been held to alleviate original public concerns over previous concessionaires, yet these have not been carried out to date. The problem with this is that had they been held annually as in the agreement, public knowledge and input about this Schilling Lodge would be far more extensive. Our neighbour across the road who is a 2nd homeowner on Polaris had absolutely no idea about the public workshops or the website. I would say this is because he is not a TXC member. The level of communication has not been sufficient to reach enough of the general public. If the structured annual meetings had been carried out, perhaps this would have proved more informative. So what happens now considering this part of your agreement has not happened? Is this considered a breach?
Kind regards, Debbie White

From: Paul Niwano [paul@4propertysales.co.uk]
March 14, 2017 8:34:30 AM
To: Cindy Gustafson; Terri Viehmann; schillinglodge@tahoexc.org
Subject: Schilling Lodge

Hi Cindy and Terri It has been brought to my attention that the annual review meetings should have been held in accordance with the current lease agreement with the TCPUD and TCCSEA. It appears that these have not been carried out to date. Had such meetings been held, the general public knowledge and subsequent input about the Schilling Lodge would perhaps have been much greater. In fact it is quite clear that some of our neighbours on Polaris remain oblivious to such workshops and/or the website. This may be because they are not a cross country member but it is quite clear that there has not been sufficient communication in order to meet the general public. Surely such meetings would have avoided this scenario. Why were these meetings not carried out?
Kind regards, Paul

From: Debbie White [debbie@mrooms.co.uk]
March 14, 2017 9:00:41 AM
To: Cindy Gustafson; Terri Viehmann; schillinglodge@tahoexc.org
Subject: Schilling Lodge score card - my input Attachments: DW, Schilling Lodge score card table, 140317.pdf Cindy/Terri Please find attached my input for the scoring system that I would like to be used as part of the evaluation process considering I cannot make any public workshop.
Thank you, Debbie White

(NOTE – Debbie’s completed Site Score Card attached to the above email could not be legibly displayed here due to format conversion issues)

From: Debbie White [debbie@mrooms.co.uk]
March 14, 2017
Due to the fact I am not in Tahoe at present so don’t have the opportunity to attend the workshops, here is my input relating to each criteria that has generated a score card being used to establish the most suitable site for this lodge. My comments below are in red italics and they indicate my input for each point. If they are blank, I have no comment.

I76-13
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(NOTE – Debbie’s completed Site Score Card attached to the above email could not be legibly displayed here due to format conversion issues)

From: Ivona Bergendiova [bivonka@gmail.com]

March 14, 2017 9:08 AM

To: schillinglodge@tahoexc.org Cc: Cindy Gustafson

Subject: Schilling Lodge I am a resident of Tahoe Donner and a user of the Highlands Park for occasional X-country, and I have frequently used it for hiking in the summer. I am writing to you directly because we discussed this topic with our friends how the public process is not working fairly. My friends and local residents are disappointed and upset due to secrecy and no transparency of this project. Here are my comments per the form. What is your current address or neighborhood? Tahoe Donner Check all that apply to you: TXC day ticket buyer Full-time resident Cross-country skier Would you like to stay informed? Yes bivonka@gmail.com Please circle your preferred location Option A What positive attributes does your preferred site have? I like the side where it has always been. Minimum environmental impact/environmentally friendly Closest to highway 28 minimizes traffic impact Being away from High School to reduce risk to schoolchildren What are its potential downfalls? None
Regards, Ivona Bergendiova Resident

From: Ivona Bergendiova [bivonka@icloud.com]

March 14, 2017 9:13 AM

To: schillinglodge@tahoexc.org Cc: Cindy Gustafson Subject: Schilling Lodge I am writing to you directly because I have heard from friends how the public process is not working fairly. After long discussion and presented information we are concerned. I am a resident of Tahoe Donner and a user of the Highlands Park for occasional X-country, and I have frequently used it for hiking in the summer. I enjoy peaceful and quiet area. Here are my comments per the form. Current neighborhood: Tahoe Donner. TXC day ticket buyer Full-time resident. Cross-country skier Email address bivonka@icloud.com Please circle your preferred location Option A Positive attributes of your preferred site have: Best site – keep it where it has always been Minimum environmental impact and is environmentally friendly Closest to highway 28, so minimizes traffic impact Reduces risks to schoolchildren What are its potential downfalls? None
Regards, Ivona B. Kojnok

From: Roman Kojnok [romanlaketahoe@gmail.com]

March 14, 2017 9:20 AM

To: schillinglodge@tahoexc.org, Cc: Cindy Gustafson

Subject: Proposed Schilling Lodge

I am a resident of Truckee and a user of the Highlands Park for occasional X-country and snowshoeing in winter, and for hiking and biking in the summer. I am writing to you via email rather than using the web form, because I do not trust that the web form entry will find its way to you after what I have heard of the process. I am keen to see the TCPUD work for and respect the wishes of its District voters and the wider regional community, including me. Current neighborhood: Tahoe Donner. TXC day ticket buyer. Full-time

I76-13
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resident, Cross-country skier/snowshoer. Email address romanlaketahoe@gmail.com
 Your preferred location Option A What positive attributes does your preferred site have?
 I think these are obvious, but they include Closest to highway 28, so minimizes traffic
 impact Minimum environmental impact/environmentally friendly Will be lower costs
 than sites requiring new roads. Let's keep everyone's taxes and rates down. Reduces
 traffic risks to schoolchildren in the area All the existing residents are used to I being
 there What are its potential downfalls? None
 Regards, Roman Kojnok

From: Paul Niwano [paul@4propertysales.co.uk]

March 14, 2017 10:27:28 AM

To: Cindy Gustafson; Terri Viehmann; schillinglodge@tahoexc.org; Terri Viehmann;
 schillinglodge@tahoexc.org

Subject: Schilling lodge annual meetings

Dear Cindy and Terri Following my email concerning a lack of annual meetings, I have
 several other points I would like to raise concerning the Schilling Lodge construction.

What should be a democratic process is evidently flawed in numerous ways. Holding
 workshops to gather public opinion and encourage discussion is meaningless if people are
 then simply told at said workshops that the lodge is (quote) "a done deal and it will be
 going by the school" and displayed the scores showing the school site to be the best
 location. Furthermore, the questionnaires on the website do not contain the score cards
 criteria which beggars the questions how the current total scores have been calculated?
 These results are supposed to be collected and reviewed before being presented so why
 have you been broadcasting them throughout the process?

There is also the issue of the scoring which I believe to be completely misleading in
 having 1 as the preferential option. Surely the higher the score should be the more
 suitable the site? You have provided no reasoning for how they have been scored, as if
 we are simply supposed to accept the given score without any explanation. I would
 appreciate a more thorough explanation or for the criteria to be published.

As someone who is not in Tahoe during the winter how am I supposed to contribute to
 the process? I do not consider the website as sufficient in its content or information or as
 a way to interact with the project. Moreover there is no way for me to offer my opinion as
 I cannot attend the workshops to join the discussion. I am going to have to answer the
 questions in an email in order to fully offer my thoughts on the questions, as personally I
 do not think that simply giving a number out of 5 is satisfactory as feedback.

Finally I feel strongly that a TCPUD member should be managing the process in a neutral
 manner. I know that many locals do not wish to speak out for fear of bias or future
 repercussion as they know TC people well. This process is being done in a way to
 exclude as many as possible, personally I will not be in Tahoe in the winter, I do not hold
 XC membership nor a pass. Why is it relevant how many people there are in my family? I
 hope you will take what I have written on board and seriously reconsider the manner in
 which this project is being undertaken.

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Kind Regards, Paul

From: Paul Niwano [paul@4propertysales.co.uk]

March 14, 2017 11:16:54 AM

To: Cindy Gustafson; Terri Viehmann; schillinglodge@tahoexc.org

Subject: Score card feedback

Dear Cindy and Terri Please find attached a copy of the Schilling Lodge score card that I have entered my feedback onto. I hope these comments will be taken into consideration Due to the fact I am not in Tahoe at present so don't have the opportunity to attend the workshops. Here is my input relating to each criteria that has generated a score card being used to establish the most suitable site for this lodge.

Regards, Paul

(NOTE – Paul's completed Site Score Card attached to the above email could not be legibly displayed here due to format conversion issues)

From: Val Service - Phill Robinson

March 14, 2017 11:58:10 AM

To: Cindy Gustafson; Terri Viehmann

Subject: Schilling Lodge, Highlands

Cindy Afternoon. I am a regular visitor to Tahoe and have been for 18 years. I spend my time enjoying the trails in the Highlands hence writing to you about the proposed Schilling Lodge Project. I know the Lodge has its own website and questionnaire but I prefer to email you directly to ensure my comments are noted. I have been doing my homework and it is widely known that the preferred site for the new lodge (that will be 7200 sq ft and not the original 4000 sq ft that was donated) will be on Polaris Road.

I strongly believe the most sensible solution is to construct the donated lodge of 4000 sq ft at the original site referred to as Option A. This will minimise major disruption and upheaval within the area. It will also reduce environmental impact, traffic issues, impact on the community and cost. There is no need to undertake such a drastic and damaging project when the current site works. Option A gives a known identity close to the highway, allowing the construction of the lodge to take place in the quiet, off peak times (summer) to provide a new and improved current facility. As far as I see, there are no potential pitfalls to retaining the site and improving the current facility. There is so much I could say but I'm not sure how far to go. If you would like any further input from me I would appreciate hearing from you.

Thank you for your time., Phill Robinson.

From: Kerry McGillivray

March 14, 2017 at 5:21:37 PM

To: Cindy Gustafson

Subject: Schilling Lodge score card tables attached.

Hi Cindy The Schilling scorecard has been circulated so I have commented where appropriate for a local residents perspective.

Regards, Kerry McGillivray

I76-13
cont.

(NOTE – Kerry’s completed Site Score Card attached to the above email could not be legibly displayed here due to format conversion issues)

From: Marguerite Sprague (mshtahoe@gmail.com)

April 21, 2017 2:01:29 PM

To: jfriedman, j pang; scottzumwalt; d.wilkins; Ron Treabess;

Subject: This morning and Schilling Lodge

Dear Judy, John, Ron, Dan and Scott: Good morning and I am sorry for the last minute communique: it was only this morning that I was made aware that you are considering the Schilling Lodge project at the Tahoe XC center today; I had previously understood that would take place in June, and I am out of town. Hence my last minute note. This is an exciting project! A gift of a historic building is significant, as is the opportunity it presents.

Please don’t approve putting it by the high school. Up front I’ll tell you that I live extremely close to that location, so it impacts my family and neighbors very directly. But even if I lived miles away I would encourage you to locate it elsewhere because it makes more sense. If this area were undeveloped, the high school location could seem ideal for many of the reasons the Tahoe XC board noted in their survey and at their public meeting. But in reality, this is an established residential area that has been there for decades. It does not include a sizeable recreational business with a vision of 365-day-a-year operations that bring in good sized crowds.

The established Tahoe XC location has been operating successfully for at least two decades with success in good winters. You can easily anticipate the impacts of increased traffic, including problems for the school activities that currently use Polaris Rd. for pedestrian activities, from cross-country teams to elementary class field trips on foot. That doesn’t include the local residents who regularly walk that route with pets and children.

The high school currently fields calls about speeding students and acts upon those calls immediately. It is unlikely a XC ski facility would be as responsive or have as much authority over their speeders. But there are two larger points. One, why develop a new site, which requires permanently removing forest when you can make use of an already-developed site? There will always be pressure to develop our natural basin lands, as long as there is money to be made. Enough of them have been eliminated, it is a worthy task for us to carefully evaluate the benefit of more natural lands loss vs. what will replace it. Is it really worth it?

That brings the second larger point: people who have been studying the Tahoe basin for many years have pointed out the impacts of climate change are already here and increasing. They tell us that we can anticipate, despite this epic winter, that the majority of winters to come will not feature snow at the lake or Highlands level and precipitation that falls there will mostly be rain. It does not make sense to develop a new center based on something that is not likely to happen.

I76-13
cont.

When I asked the Tahoe XC board member about this, he smiled and said gently, “we prefer to believe we’ll continue to have good winters.” Heck, we’d ALL prefer to believe that, but we are fools if we assume it is fact, especially when TERC and other researchers tell us it ain’t so. They are not making this up. At least, it means it makes more sense to put the new building where the old building has been so as to keep more forest intact. Then if we aren’t seeing more epic winters, at least we have not destroyed more forest. Please put the new Schilling Lodge building where the current buildings are and preserve as much of our beautiful forested land in our area as possible. Respectfully yours,
Marguerite Sprague

Note – At the 21 April 2017 Board Meeting, TCPUD provided TCCSEA/TXC a dedicated Agenda Item for a presentation on its project that consisted of forty-six (46) Powerpoint slides.

From: Roger Huff (huffmtry@aol.com)

April 21, 2017

To: Cindy Gustafson; Ron Treabess; Judy Friedman; Terri Viehmann

Subject: THANK YOU

Good job on another well-run meeting, even though there were fewer comments than some expected. This might have been due to Cindy’s “peace initiative” lead-in, or perhaps folks realizing we have come almost full circle back to the original 2014 site options. Moving forward, I ask the TCPUD to very carefully consider the following three questions:

1. Do you believe that all of the parties have thus far acted honestly and kept their promises, without taking unfair advantages of others?
2. Do you believe that the information presented today is complete, accurate, and unbiased enough to avoid a GIGO (Garbage In, Garbage Out) decision?
3. Do you believe Public Trust has been damaged at this point, and if so, what should be taken to repair it? I am not comfortable that the normal CEQA process adequately addresses Public Safety issues, and would also like amplification on the “Ownership Decisions” bullet on the What Else Happens After/During CEQA slide in today’s presentation.

Thanks again, Roger

From: Paul Niwano [paul@4propertysales.co.uk]

April 22, 2017 6:21 AM

To: Cindy Gustafson

Subject: Schilling Lodge concerns

Good afternoon I am writing to you concerning the Schilling Lodge selection process as I am unable to attend the meeting to offer my opinion in person. There are several points I wish to raise, as follows. - Why is the TCCSEA/TXC given such preference over the wider community? Is such an enlarged structure with parking facilities really beneficial

I76-13
cont.

for the local area or simply for the club's advantage? - The perceived traffic impact score appears to completely neglect that Polaris Road is the most heavily travelled road in the Highlands neighbourhood. Surely such a fact should be of utmost importance when considering possible traffic implications of Site D. - Polaris is also regularly used by physical education groups and walking children to/from school. Also surely should be considered as highly important when considering Site D? - Likewise, score for Site D does not take into consideration that Polaris Road west of Heather is the only emergency evacuation route for middle and high schools. - Shouldn't the implications of alcoholic beverages possibly being on the premises right next to said schools also be carefully considered? - Finally, the site scoring team appears to be nearly completely composed of TCCSEA/TXC members, hired consultants or other individuals which share its agenda. I would also like to request that the TCPUD continues to oversee this process considering that it is on TCPUD land and will also have major implications on TCPUD voters and tax payers. Thank you and I hope you will take all of the above into consideration.
Kind regards, Paul

From: Robert Olson

April 21, 2017 12:59:47 PM

To: paul@4propertysales.co.uk

Subject: TXC: public comment

Hi Paul, thank you for your comments, unfortunately I was already at the meeting and my phone was off this morning and just started checking my mail now. Please see notes at the end of this email from Terri at the TCPUD, where she walked another member of the public through access to the board meeting that took place. The TCPUD board did vote in favor of proceeding with Site A, Site D and no-project into the CEQU process. There is still plenty of time to hit on these concerns and address them properly.

Thanks again and yes, I take everything into consideration.

Robb Olson o l s o n - o l s o n e n a , llc. Gallery PO Box 7949. Tahoe City, CA,

From: Debbie White [debbie@mrooms.co.uk]

April 27, 2017 4:24 PM

To: Cindy Gustafson ; Terri Viehmann ; Bob Bolton

Subject: Schilling Lodge follow up

Cindy et al I am following up in consideration of Option A and D being pursued as announced in the public meeting last week. Is there a plan to conduct a full and 'proper' traffic study that also includes fire input for both venues?

Thank you. Debbie White,

From: Terri Viehmann

April 28, 2017 9:20:00 AM

To: "Debbie - Mountain Rooms & Chalets" Cc: Cindy Gustafson; Matt Homolka

Subject: RE: Schilling Lodge follow up Hello Debbie, Thank you for your questions and concerns. The next steps in the process will follow the California Environmental Quality Act's (CEQA) mandates. Traffic and public services are analyzed through that process.

We will keep you informed regarding the upcoming meetings and CEQA process.

Terri Viehmann District Clerk Tahoe City Public Utility District

I76-13
cont.

From: Stacy Bordes <stacyalain@earthlink.net>

August 15, 2017 12:38 PM

To: jfriedman@tcpud.org, jpang@tcpud.org, d.wilkins@tcpud.org, scottrzumwalt@gmail.com, r.treabess@tcpud.org, mhomolka@tcpud.org, rcruz@tcpud.org, tviehmman@tcpud.org

Subject: Schilling Lodge-CEQA process

I would like to reiterate my concerns about the inadequacy of the traffic study performed by TXC and my hope that this will be taken very seriously during the CEQA process. Perhaps a longer, more comprehensive study is needed before this larger than expected Schilling project is accepted in a new location.

As I have mentioned several times to TXC and at the PUD meetings, the impact on the safety of 800+ staff and students/athletes attending and working at North Tahoe School and North Tahoe High School plus the families going to and from school and sports activities, as well as adult sports league activities also held at the school, is critical to review during this process.

The intense traffic patterns within the Highlands can change with differing seasons (school year, holiday periods, winter, summer, etc), differing days of the week during these seasons, and differing hours of the day in which heavy traffic already occurs.

I feel strongly that the CEQA process and the PUD board need to take into account the importance of the inadequate traffic study and the impact increased traffic will have on the west side of the Highlands (should the project be relocated) especially since the Schilling project expects to build a complex that will offer significantly more activities beyond skiing and biking (such as a wedding venue, private affair rental, ski academy, etc).

I would appreciate your specific attention to this issue,

Thank you, Stacy Bordes Highlands Resident

From: Roger Huff (huffmtry@aol.com)

August 19, 2017 9:49:12 AM

To: jfriedman@tcpud.org, d.wilkins@tcpud.org, jpang@tcpud.org, r.treabess@tcpud.org, scottrzumwalt@gmail.com, rcruz@tcpud.org, tviehmman@tcpud.org

Subject: For The Record Corrections To 18 AUG Meeting Statements

Dear Board Members.

We were unable to attend yesterday's Special Board Meeting due to schedule conflicts; and while the ability to view the proceedings via streaming video are greatly appreciated, in this case it prevented us from addressing the following inaccuracies during the Public Comment session:

I76-13
cont.

- This meeting was professionally run as usual, but during the opening remarks to the TXC CEQA Work Plan agenda item, the speaker said that, “the District staff hadn’t seen any evidence that the applicant controlled or altered information.” This was surprising, since on March 6, 2017 the TCPUD Board and Management received *twenty-seven (27) specific examples* of such behavior including five (5) that used the applicant’s own words to describe its changes to public questions on the Web Site Questionnaire it controlled. Please review this information.
- The discussion about public outreach got off track because most complaints are not about the TCPUD’s or Highlands HOA’s efforts, but rather about the inadequacy of the TCCSEA’s process. The only communication many Highlands homeowners received from the TCCSEA was a 3 X5 postcard with a photo of the *original* Schilling Lodge on its front and an invitation to poorly-defined Public Workshops on its back. There was no mention whatsoever that TCCSEA was proposing to more than double the facility’s size. This is not acceptable behavior, and another reason some have raised concerns about multiple failures to act in good faith.
- There also appears to be the misconception that most public objections pertain to traffic, which is not the case because they also concern: private property values, noise, possibly allowing alcohol next to schools, putting a privately owned/operated facility on publicly-owned land, etc.
- During closing remarks for this agenda item, one speaker suggested there may be some equivalency about increased traffic at the two candidate sites, but this would be like comparing apples to oranges, because Polaris is by far the busiest street in the neighborhood during winter, school children and gym classes routinely use Polaris, and Polaris is the only emergency evacuation route for multiple schools. None of these were addressed in the TCCSEA’s Traffic Study, leading to legitimate questions about its credibility.

I wholeheartedly agree with (what I think was) Dan Wilkins’ comment that this has to be far more extensive than the usual CEQA review process. Projects based upon one-sided or deficient information are like buildings upon quicksand. Sooner or later, both will develop structural cracks and fall apart, so be careful. Please add the above to your record correspondence file on this project.

Thank you, Roger Huff

In a message dated 8/22/2017 5:14:43 P.M., mhomolka@tcpud.org wrote:

Roger,

Thank you for forwarding this to us. I had reviewed the attached document when you sent it originally and again today. It has not changed our recommendations or conclusions.

It has been added to our public input file. We look forward to working with your community to provide the best project for your neighborhood and all recreation users.

Thank you, Matt Homolka, P.E.

I76-13
cont.

From: HuffMntry@aol.com

August 22, 2017, 8:31:22 PM

To: mhomolka@tcpud.org

Cc: tviehmman@tcpud.org, kboyd@tcpud.org

Sent: 8/22/2017 8:31:22 PM Pacific Standard Time

Subject: Re: FOR THE RECORD CORRECTIONS TO 18 AUG MEETING STATEMENTS

Matt,

Thank you for your response. We agree that this project ought to be best for all users and for our community as a whole, rather than narrowly focusing upon this applicant's desires.

Regards, Roger

From: Huff [mailto:huffmntry@aol.com]

January 11, 2018 12:32 PM

To: Sean Barclay <sbarclay@tcpud.org>; Kim Boyd <kboyd@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; Dan Wilkins <d.wilkins@tcpud.org>; Ron Treabess <r.treabess@tcpud.org>; John Pang <jpang@tcpud.org>; Scott Zumwalt <scottrzumwalt@gmail.com>

Cc: Terri Viehmann <tviehmman@tcpud.org>

Subject: SERIOUS TXC LODGE EIR WORK STATEMENT PROBLEMS

Good Afternoon,

The attached highlights areas of concern that Highlands Residents asked to be corrected back in October (see below), but still exist in the current CEQA Work Statement that also schedules a "Close of Scoping" date of 19 January, several days before the Highlands Residents' meeting.

TCPUD Response: The CEQA schedule has changed. The scoping phase of the environmental review has not yet begun. We will discuss the timing of the scoping period in detail at Monday's neighborhood meeting.

Please make the following requested changes now.

Thank you,

Roger

1. **Under Project Understanding.** The name of this project has already changed several times, and there are growing public concerns that each has furthered the applicant's claims. The latest project name needs to be changed, because it *improperly and incorrectly* implies that the proposed facility would:

TCPUD Response: It is not uncommon, during the early planning stages, for a project name to change many times. The project name will remain as is and not be changed at this time. The name *properly and correctly* implies the following.

I76-13
cont.

- a. belong to, be operated by, and intended for exclusive use of the TXC, and

TCPUD Response: Any or all of these may be the case or some variant of them.

- b. be a "replacement to and expansion of" the existing Highlands Community Center facility

TCPUD Response: Agreed.

A less controversial and more appropriate name may be the "Enlarged Shilling Lodge" project.

TCPUD Response: We prefer the current project name.

2. **Under Key Issues**, please make the following changes:

- a. In the first sentence, replace "Tahoe Cross Country Lodge" with "Highlands Community Center, which is the correct name for the existing facility, and

TCPUD Response: See first sentence of the Project Understanding. It identifies the Highlands Park Community Center as also being named the "Tahoe Cross Country Lodge" or "Tahoe XC Lodge". These names are interchangeable to us and are simply used to identify a facility and the activities associated with that facility.

- b. Add wildfire safety, possibly allowing alcoholic beverages on the premises, and congestion of the only emergency evacuation route from the schools to the last sentence due to their importance among public safety concerns.

TCPUD Response: TCPUD and Ascent are aware of these concerns. If they are not satisfactorily addressed by the CEQA document, please comment at that time.

4. **Under TASK 2: Environmental Scoping** - The Draft NOP can't "depict the location of the project on a map" if the location hasn't been decided at that point, and the proposed 30-day review period is inadequate to obtain public inputs, especially from part-time or (temporarily) out-of-the-area residents. Please change the latter to 60-days.

TCPUD Response:

1. The NOP will in fact depict the location of the proposed project being evaluated by the CEQA Document.
2. We acknowledge the request to extend the review period. The TCPUD will decide in the future whether the review period should be extended beyond statutory requirements.

5. **Under TASK 3: Administrative Draft EIR Item** - The second paragraph again mentions four alternatives, but does not define what they are. Please do so.

I76-13
cont.

TCPUD Response: The final approved scope of work actually mentions three alternatives in this location. The topic of alternatives being evaluated will be discussed at Monday's neighborhood meeting.

6. **Under TASK 3: Transportation/Traffic Item** - Please make the following changes to this item:

a. Add pedestrian safety and increased congestion of the only emergency evacuation route from the schools to items listed in the first sentence,

TCPUD Response: TCPUD and Ascent are aware of these concerns. If they are not satisfactorily addressed by the CEQA document, please comment at that time.

b. **Do not** rely on LSC's Traffic Analysis of April 2016, because it did not address these important public safety factors and used questionable data sampling;

TCPUD Response: A new traffic analysis is included in this scope of work. However, data collected in support of LSC's April 2016 Report will be used in this new analysis.

c. Address the frequent use of Polaris Road by gym classes and cross-country teams during regular school hours, and

TCPUD Response: Presumably these existing uses will be captured in the existing conditions analysis. If they are not satisfactorily addressed by the CEQA document, please comment at that time.

d. Describe why, after being eliminated by the Applicant, the Cedarwood Drive site is apparently still being considered.

TCPUD Response: The topic of alternatives being evaluated will be discussed at Monday's neighborhood meeting.

TCPUD Response to Items 7 – 15 Below: TCPUD and Ascent are aware of the concerns or desire for additional information contained in these comments and will address them in the CEQA document. If that they are not addressed satisfactorily, please comment at that time.

7. **Under TASK 3: Noise Item** - Please make the following changes to this Item:

a. Define "short-term measurements", and

b. Describe how the "estimated traffic noise levels for existing and future traffic noise levels" would be determined and adjusted for temporal and seasonal variations.

8. **Under TASK 3: Greenhouse Gas Emissions** - Please include the previous mention of how tall trees around Site D limit the practicality of using solar energy systems there.

I76-13
cont.

9. **Under TASK 3: Archaeological, Historical, and Tribal Cultural Item** - Under this item, please:

- a. Identify Susan Lindstrom and her expertise,
- b. Change to note that the proposed massive structural additions to the original Schilling Lodge building would definitely have a major "effect upon that historical resource."

10. **Under TASK 3: Biological Resources Item** - Please include mention that mule deer and black bear are regularly seen crossing Polaris between Heather and the schools.

11. **Under TASK 3: Geology and Soils Item** - Please include that Site D is a watershed drainage area for a seasonal stream that crosses underneath Polaris Road.

12. **Under TASK 3: Aesthetics Sub-Item** - Please re-locate this sub-item out from under the *Less-Than-Significant* Item category, because this large structure and parking area would clearly affect the aesthetics (and property values) of nearby residences.

13. **Under TASK 3: Hazard, Hazardous Materials, and Risk of Upset Sub-Item** - Please move this sub-item out from under the *Less-Than-Significant* Item category, because it must also address routine on-site equipment fueling and maintenance activities.

14. **Under TASK 3: Land Use and Planning Sub-Item** - Please clarify this sub-item which are confusing and appears to be somewhat contradictory.

15. **Under TASK 3: Public Services Sub-Item** - Definite re-locate this sub-item out from under the *Less-Than-Significant* Item category, because congestion of the only evacuation route from schools would clearly affect the response times of emergency vehicles, and is a very high visibility public safety issue.

16. **Under TASK 6: Administrative Final EIR Item** - Do not underestimate the level of controversy about the applicant's: control and alteration of public input, credibility of its Site Scoring, and neglect to consider major public safety concerns.

TCPUD Response: Noted.

In a message dated 1/18/2018 6:09:20 PM, mhomolka@tcpud.org wrote:

Roger,
I wanted to take this opportunity ahead of our upcoming neighborhood meeting to respond more directly to your emailed comments regarding our environmental consultant's (Ascent) contractual scope of work.

I76-13
cont.

We apologize and recognize that at this early planning stage, there is limited official information from the TCPUD to rely on to clearly understand the project. We are developing additional information and will be publishing it soon. We can understand how Ascent's contract and scope of work, being the latest public document produced, can receive this level of scrutiny as there is not a lot of other information out there on which to comment.

The document you reviewed (Ascent's Scope of Work, or "Work Plan" as they called it) is an attachment to their consulting contract with the TCPUD whereby they agree to complete environmental review of the proposed project and alternatives in compliance with the California Environmental Quality Act (CEQA). The scope of work broadly defines the underlying assumptions and level of effort necessary to complete the scope of work and provides the basis for their estimated compensation.

The scope of work also presents Ascent's general understanding of the project and their assumptions at the time they prepared their proposal. I can assure you that their understanding of the project is much clearer today and will continue to grow as the work proceeds. However, we do not simply modify approved contractual scopes of work to clarify understanding. Changes are only made to clarify changes in level of effort and compensation.

It is important to note what the scope of work is not. It is not the Project Description nor is it the CEQA document (an Environmental Impact Report [EIR] in this case) for the project. This distinction is important because many of your comments below will be addressed in the forthcoming EIR. Your comments have been provided to Ascent so they are aware of the concerns and they can address them in the EIR to the extent they are germane to the environmental review.

The public will have additional opportunity during the CEQA scoping period (initiated by release of a Notice of Preparation [NOP]) to provide input on environmental issues to be addressed and alternatives to be considered in the EIR. The timing of the scoping period, release of the NOP, and future CEQA scoping meetings will be discussed at Monday's neighborhood meeting.

We have evaluated your comments below relative to Ascent's contracted scope of work, and will not be making any of your requested changes to that document at this time. To the degree that they inform the EIR analyses and document preparation, Ascent and the TCPUD will consider them at that time.

In an effort to address your concerns in advance of Monday's meeting, we have spent District staff time preparing this response including the following specific feedback (in the body of your original email). Please consider this our final response on the matter of Ascent's scope of work. We are not attempting to engage in a discussion on this matter. We will be happy to answer further questions at the upcoming neighborhood meeting while keeping in mind the broader purposes of that meeting.

I76-13
cont.

Sincerely,
 Matt Homolka, P.E. District Engineer/Assistant General Manager TCPUD

From: Huff [mailto:huffmtry@aol.com]

January 19, 2018 7:39 AM

To: Matt Homolka <mhomolka@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; Dan Wilkins <d.wilkins@tcpud.org>; Ron Treabess <r.treabess@tcpud.org>; John Pang <jpang@tcpud.org>; Scott Zumwalt <scottrzumwalt@gmail.com>; Sean Barclay <sbarclay@tcpud.org>; Kim Boyd <kboyd@tcpud.org>

Cc: Terri Viehmann <tviehmann@tcpud.org>

Subject: Re: RE: SERIOUS TXC LODGE EIR WORK STATEMENT PROBLEMS

Good Morning,

We forwarded yesterday's reply to others who contributed to these corrections originally requested back in October, and strongly disagree with staff opinions that continue to heavily reflect the applicant's agenda and preferences. We do realize this is an evolving process, but note that most of these same problems still exist in the *Final Tahoe Cross Country Lodge Replacement and Expansion Project Scope of Work for Environmental Review* document.

After several decades on both sides of Government contracts, I understand the differences between a Work Statement and final Deliverables (e.g., an EIR); but also recognize how the quality of the former affects the quality of the latter. The fact is a Scope of Work that is based upon misleading information or invalid assumptions, proposes to "re-use" clearly biased and deficient documents (i.e., the Site Survey and 2016 Traffic Study), or casually dismisses areas of major concerns to affected residents, will not produce a credible EIR; and decision-making processes like CEQA tend to operate on a garbage in, garbage out, principle.

We have nothing personally against the applicant, but are very concerned with what this project is doing to essential relationships within our community. If the TCPUD wants to truly be the Lead Agency, it would be wise to avoid potential conflicts of interest, increase transparency, and be more responsive to public concerns and requests. Thanks again for your response, and I sincerely hope that next Monday's meeting will put everyone upon a more constructive path.

Have a good weekend,
 Roger

In a message dated 1/19/2018 1:30:14 PM, mhomolka@tcpud.org wrote:

Roger, I appreciate your response and we will make sure the Board receives a copy it in their next Board packet. I look forward to seeing you Monday and we share the same hopes for that meeting.

Matt Homolka, P.E. District Engineer/Assistant General Manager. TCPUD

I76-13
 cont.

From: huffmstry@aol.com

January 23, 7:03:11 AM

To: mhomolka@tcpud.org, sbarclay@tcpud.org, kboyd@tcpud.org,
jfriedman@tcpud.org, scottrumwalt@gmail.com

Cc: jpang@tcpud.org, d.wilkins@tcpud.org, r.treabess@tcpud.org, tviehmman@tcpud.org

Subject: SUBSEQUENT FEEDBACK FROM HIGHLANDS RESIDENTS' MEETING

Good Morning,

Yesterday's meeting afforded an opportunity for Highlands Residents to express their sincere and serious concerns about: public safety along Polaris and Old Mill, and proposed massive additions to the original historic structure. It also resulted in the following subsequent feedback that I'm forwarding for TCPUD's consideration:

- Statements made during the meeting confirmed residents' suspicions that: (a) key project documents are "heavily influenced" by the applicant's bias and site preference, and (b) the TCPUD is aware of this. If this is permitted to perpetuate into decision-basing documents (e.g. the EIR), however, it will destroy their credibility.
- The latest name change to the *Tahoe Cross Country Lodge Replacement and Expansion Project* has led several residents to ask, "**What is the Tahoe Cross Country Lodge, and what at this point has been decided would be 'replaced' or 'expanded'?**" They point out the TXC is a tenant activity, that rents space for commercial operations in the TCPUD-owned *Highlands Community Center*, which is also used for other Community functions (e.g., Boy Scouts, HOA meetings). The TXC has erected a sign calling the property the *Tahoe Cross Country Ski & Snowshoe Center* (**not** Tahoe Cross Country Lodge); but **putting up** a sign doesn't authorize it to re-name, replace, or expand this Community asset. To correct this, please delete the terms "Replacement and Expansion" from this project's name.
- A number of residents were disappointed to hear that the TCPUD had elected to not make any of the requested changes to the CEQA Contractor's Scope of Work to: (a) correct invalid or misleading information, (b) prevent the "re-use" of biased/deficient documents (e.g., Site Scores, the 2016 Traffic Study, and (c) not dismiss items of serious concern to Highlands Residents as having "Less Than Significant Impact."

Please consider this additional feedback. Yesterday's meeting was good, but speaking is only half of communicating effectively.

Thanks again,

Roger

From: huffmstry@aol.com

March 22, 2018, 10:04:57 AM

I76-13
cont.

To: jfriedman@tcpud.org, d.wilkins@tcpud.org, jpang@tcpud.org, r.treabess@tcpud.org, scottrzumwalt@gmail.com, sbarclay@tcpud.org
 Cc: mhomolka@tcpud.org, kboyd@tcpud.org, tviehmenn@tcpud.org
 Subject: SCHOOL TRAFFIC ON POLARIS ROAD

Dear Board Members,

Morning School Vehicle Traffic - On Wednesday March 21st 2018, all vehicles traveling on Polaris Road between Heather and the schools were counted from 6:30am until 8:30 am. It was raining, the berms limited sight distance out of some driveways, peak traffic occurred between 7:00am and 8:30am, and the average speed increased after 8:00am. Following are these actual counts:

Vehicles going toward the Schools:

Private Vehicles:	280
School Buses:	7
Commercial Trucks:	1
Subtotal:	288

Vehicles going away from the Schools:

Private Vehicles:	95
School Buses:	7
Commercial Trucks:	1
Subtotal:	103

Total Morning School Traffic Count: 391

Afternoon School Vehicle Traffic - Because the same basic makeup of faculty, staff, and students have to go back home, it is reasonable to assume that similar numbers of (one-way and two-way) trips would occur during the peak afternoon school traffic period(s).

Daily School Vehicle Traffic Load - School traffic upon this section of Polaris during these two, 2-hour (morning and afternoon) periods alone is approximately 800 vehicles, far more than any other street in the Highlands residential neighborhood.

School Pedestrian Traffic - Some neighborhood students were seen walking to school in the rain that day, but substantially larger numbers are typical in better weather and earlier that same several groups of 10-15 students that looked like gym classes were seen running in the roadway on that section of Polaris Road.

Evacuation Traffic Load – At 10:00am there were 180 vehicles in the schools' parking lots. Timely egress of this number of vehicles when the only evacuation route is clogged up with emergency response vehicles, concerned parents, etc. is simply unrealistic and would be unacceptably aggravated by any additional traffic on this section of Polaris Road.

I76-13
cont.

Summary – The above numbers of more practical value than: Turn Counts, LOS values, etc. When it comes to safety in the Highlands, the true “experts” are those who face the dangers daily. Please consider this information very seriously.

Thank you, Roger

From: Roger Huff (huffmtry@aol.com)

March 30, 2018 7:19:49 AM

To: jfriedman@tcpud.org, d.wilkins@tcpud.org, jpang@tcpud.org, r.treabess@tcpud.org, scottrzumwalt@gmail.com, sbarclay@tcpud.org Cc: mhomolka@tcpud.org, kboyd@tcpud.org, tviehmman@tcpud.org

Subject: COMMUNICATING AND CREDIBILITY

A major concern continues to be the potentially irreparable damage this controversial project is doing to critical communications and credibility in our community. Here are a couple of simple suggestions to help avoid such catastrophic consequences:

1. Do not allow Board meeting presentations and formal discussions to be dominated by the applicant's perspective, while alternatives and opposing viewpoints are limited to a single slide as an afterthought or brief public comments.
2. Schedule and dedicate formal Board discussion time during Agenda Items to address public concerns, complaints, and requests, so that people don't continue to feel that their inputs are being ignored. Communicating effectively is one of the most important (and most difficult) we have to do even though it only has two basic components; and credibility is much easier to lose than to regain. I hope that the above suggestions help improve both.

Sincerely, Roger

From: Ann Hobbs (Placer County Air Quality Control Board)

April 18, 2018 5:41:51 PM

To: Terri Viehmann Cc: Yu-Shuo Chang

Subject: TXC Lodge Project NOP

Hi there: We recently received a letter to our Board of Directors, from a constituent in the Tahoe City area, that references the TXC Lodge project NOP – Notice of Preparation. As the local air quality agency for Placer County, we wanted to review the document, but have not found a copy available on line, either on your website or on the Tahoe XC website. We did find extensive information from your board's board meeting on it, with a reference in a presentation that mentioned that the NOP was going to be available until early April. Could you please provide the link to the document. Thank you

From: Kim Boyd

April 19, 2018 1:40:24 PM

To: ahobbs@placer.ca.gov Cc: ychang@placer.ca.gov; Sean Barclay; Matt Homolka; Terri Viehmann

Subject: Re: TXC Lodge Project NOP

Ms. Hobbs, Thank you for your inquiry regarding the NOP for our Tahoe XC Lodge project. The NOP has not yet been released. We anticipated an early April release, but we are currently in discussion with the Tahoe Regional Planning Agency about the NOP. We

I76-13
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hope to have it released in the next week or so, and we will certainly ensure distribution to your agency.

Sincerely, Kim Boyd Senior Management Analyst Tahoe City Public Utility District

From: Roger Huff [huffmtry@aol.com]

April 29, 2018 7:37 AM

To: Judy Friedman ; Dan Wilkins ; John Pang ; Ron Treabess ; Scott Zumwalt ; Sean Barclay
Cc: Matt Homolka ; Kim Boyd ; Terri Viehmann

Subject: COMMUNICATING AND CREDIBILITY - FOLLOW UP QUESTION

Good Morning, Hope you all had a nice weekend. Has any action been taken on the two suggestions in my 30 March email?

Thank you, Roger

From: Sean Barclay

May 03, 2018 7:13:17 AM

To: Huff; Judy Friedman; Dan Wilkins; John Pang; Ron Treabess; Scott Zumwalt
Cc: Matt Homolka; Kim Boyd; Terri Viehmann

Subject: RE: COMMUNICATING AND CREDIBILITY - FOLLOW UP QUESTION

Hello Roger, I hope you are well. As you'll recall, this Project was on the agenda at the TCPUD Board meeting in March specifically to provide the public an opportunity to address the Board. You are always welcome and encouraged to attend any meeting of the Board of Directors to share your concerns and suggestions in person during public comment. The next Board meeting is scheduled for Friday, May 18th at 8:30am.

Sincerely, Sean Barclay General Manager Tahoe City Public Utility District

From: Roger Huff [huffmtry@aol.com]

May 03, 2018 7:53:59 AM

To: Sean Barclay; Judy Friedman; Dan Wilkins; John Pang; Ron Treabess; Scott Zumwalt
Cc: Matt Homolka; Kim Boyd; Terri Viehmann

Subject: Re: COMMUNICATING AND CREDIBILITY - FOLLOW UP QUESTION

Good Morning Sean, Thanks for the response, so please let me try to clarify. People have remarked that their specific questions or concerns rarely are afforded agenda items, presentation time, or formal discussion like the TCCSEA/TXC's agenda; but are treated more like afterthoughts and restricted to a few minutes of informal public comments by those who can attend the meetings in person. You may wish to dedicate a specific Agenda Item for the May 18th meeting to formally presenting (and discussing) a roll-up of on-record public concerns and questions. Please consider doing this.

Cheers, Roger

From: Roger Huff [huffmtry@aol.com]

June 22, 2018 12:24 PM

To: Kim Boyd
Cc: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka

Subject: Re: Tahoe Cross Country Lodge Replacement and Expansion Project - NOP

Thank you, Kim! Expressed concerns about the proposed EIR Scoping Meetings include:

1. That the public is provided less than thirty (30) days notice,

I76-13
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2. Both of them are scheduled to be held on the same day, and
 3. There isn't any provision for those who can't attend in person. Please review and discuss the above and other public concerns with the Staff and Board members, and consider making changes.
 Have a great weekend, Roger

From: Roger Huff [huffmtry@aol.com]

June 23, 2018 10:54 AM

To: Kim Boyd Cc: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Terri Viehmann

Subject: REQUESTED CHANGES

Hi Kim, Unfortunately, the NOP continues to damage credibility by repeating much of the same incorrect or misleading wording that residents asked be corrected in the Draft EIR's Work Statement last October. Let's try again, before they get perpetuated into the EIR. I have highlighted and annotated some of them in the attached version of the NOP that you sent, and very strongly recommend that they be corrected this time around. The failure to do so now will just lead to future controversies.

Regards, Roger

Note - Format conversion issues prevented legible the display of the attachment referenced in the above email

From: Roger Huff [huffmtry@aol.com]

June 27, 2018 11:14 AM

To: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt Cc: Sean Barclay; Kim Boyd; Terri Viehmann; Matt Homolka

Subject: TXC SKI LODGE PROJECT - REQUESTED EIR SCOPING ACTION ITEMS

Dear TCPUD Board Members, Please: (1) Present and discuss all the following categories and questions (copied from official CEQA Guidance documentation) at this project's Public Scoping Meetings; (2) Insist that all of them are thoroughly and objectively answered in the Draft Environmental Impact Report (EIR) for all candidate Sites and Alternatives; and (3) Ensure this email gets into the District's record correspondence file for this project:

AESTHETICS. Would the project: Have a substantial adverse effect on a scenic vista? Substantially degrade the existing visual character or quality of public views of the site and its surroundings? OR Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

AGRICULTURE & FORESTRY RESOURCES. Would the project: Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production? Result in the loss of forest land or conversion of forest land to non-forest use? OR Involve other changes in the existing environment which, due to their location or nature, could result

I76-13
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GEOLOGY AND SOILS. Would the project: Result in substantial soil erosion or the loss of topsoil?

GREENHOUSE GAS EMISSIONS. Would the project: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? OR Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

HAZARDS AND HAZARDOUS MATERIALS. Would the project: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? OR Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

HYDROLOGY AND WATER QUALITY. Would the project: Substantially deplete decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows? OR Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river.

LAND USE AND PLANNING. Would the project: Physically divide an established community? Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? OR Conflict with any applicable habitat conservation plan or natural community conservation plan?

NOISE. Would the project result in: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? A substantial permanent increase in ambient noise levels in the project vicinity

I76-13
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above levels existing without the project? OR A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

PUBLIC SERVICES. Would the project result in: Need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?

RECREATION. Would the project: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

TRANSPORTATION/TRAFFIC. Would the project: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths? , taking into account all modes of transportation including mass transit and non-motorized travel and components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways Result in inadequate emergency access? OR Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

UTILITIES AND SERVICE SYSTEMS. Would the project: Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects? Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? OR Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years from existing entitlements and resources, or are new or expanded entitlements needed?

WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: Impair an adopted emergency response plan or emergency evacuation plan. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? OR Expose people

I76-13
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or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

MANDATORY FINDINGS OF SIGNIFICANCE. Does the project: Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? OR Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?'

I have examined the candidate sites, counted trees and traffic, and taken enough photos to realize that valid answers to these questions will reveal serious and potential "show-stopper" impacts; and I look forward to reviewing the findings of the Draft EIR.
Thank you, Roger Huff

From: Roger Huff [huffmtry@aol.com]

July 04, 2018 7:46 AM

To: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Kim Boyd Cc: Matt Homolka ; Terri Viehmann

Subject: TXC LODGE PROJECT NOP COMMENTS & DRAFT EIR INPUTS

Dear Board Members, Credibility and public trust continue to be damaged by incorrect or misleading statements in the NOP that must not be allowed to perpetuate into the EIR or other project documents. These include: The Project Title, Project Location, and Project Description paragraphs imply or state that a structure called the Tahoe Cross-Country Lodge is "located at 925 Country Club Drive" that "also serves as the Highlands Park and Community Center"; and that "the proposed project involves replacing, expanding, and relocating" it. Problems - none of these statements are factually correct. Use of the benign and ambiguous term "adaptively reuse" is misleading and doesn't describe the massive internal changes and additions to the original historic structure; and the Renderings don't properly depict a basement level. Besides correcting the above items, to be more credible please ensure that the Draft EIR also includes a compilation of concerns identified by members of the public.

Thank you, Roger Huff

From: Roger Huff [huffmtry@aol.com]

July 08, 2018 7:47 AM

To: Judy Friedman; Ron Treabess; Dan Wilkins; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Kim Boyd Cc: Terri Viehmann; Jess McMillion

Subject: REQUESTED REALITY CHECKS FOR THE 10 & 17 JULY MEETINGS

Dear Board Members, Please read and discuss the following during both the 10 & 17 July

I76-13
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meetings: When we moved here from the south shore I wanted a lakefront estate, but we were quite happy with our one-bedroom condo. Before we bought our current SUV, I wanted a Porsche; but we have been very satisfied with our Chevrolet. Timely reality checks can avoid making foolish mistakes and getting in over one's head; and the recent funding prioritization by the TOT Grant Advisory Committee should provide this project a critical wake-up call.

One Reality – cumulative costs for: environmental impact analyses, mitigation, design, engineering, construction, public safety issues, and legal fees for the Site D Alternatives (i.e., Full Project, Reduced Project, Alternative Driveway) are extremely high, and quite possibly unrealistic.

Another Reality – continuing to waste precious funding on exploring unrealistic options at this point may limit one to the least desirable alternative (e.g., No Project) downstream. Eliminating the Site D Alternatives and reducing the scope and cost of the EIR would make the project more realistic and affordable, and would currently still offer the Site A – Modified Project and No Project Alternatives; but please re-consider the following (less costly, less controversial, and more realistic) Alternative proposed to the TCPUD in March: REALISTIC PROJECT ALTERNATIVE:

1. Replace the 2,465 sq. ft. Highlands Community Center with the original 4,607 sq. ft., two story, historic Schilling Lodge; as favored by the vast majority of residents in 2014, and as consistent with both the Donor's and the Schilling Family's stated wishes;
 2. Only allow minimal, internal, modifications required not just to meet essential needs of the Applicant; but also for larger Community enjoyment as the Donor and Family intended;
 3. Make the parking area less obtrusive by limiting its additions to those needed to minimize on-street parking on an average winter day, and using the smaller 2,814 sq. ft. surface footprint of the original Schilling Lodge; and
 4. Transfer its final ownership to the TCPUD to avoid problems associated with putting a privately-owned facility on publicly-owned land, and allowing it to be shared by "the larger Tahoe Community" as the Donor has stated.
- Very sincerely, Roger Huff

From: Kim Boyd

July 09, 2018 10:42:12 AM

To: Huff; Judy Friedman; Ron Treabess; Dan Wilkins; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka Cc: Terri Viehmann; Jess McMillion

Subject: RE: REQUESTED REALITY CHECKS FOR THE 10 & 17 JULY MEETINGS

Hi Roger, Thank you for your comments. Your message has been distributed to Board and staff for their review and will be distributed to the Parks and Recreation Committee on July 10th, and included in the July 20th Board packet.

Kim Boyd Senior Management Analyst Tahoe City Public Utility District

From: Vivian Euzent [veuzent@comcast.net]

July 08, 2018 2:19 PM

I76-13
cont.

To: Kim Boyd ; Ski@TahoeXC.org

Subject: Tahoe XC Lodge Replacement & Expansion Project

As a part time resident of Truckee, I have been willing to drive to Tahoe Cross Country Ski Area for about 17 years because the staff is so friendly and helpful, other skiers (many of them local residents) are helpful on the trails, and the trail system allows one to get to the more advanced trails without having to spend an hour skiing on the beginning trails in order to get to them. Tahoe XC has successfully created an extremely welcoming and supportive atmosphere. I have enjoyed watching Tahoe XC add programs, a cafe, and, of course, the memorable free hot chocolate or tea on the trail in the warming huts. I strongly support the Site D - Full Porject. This project would make the ski area top rate and increase the likelihood of financial stability.
Sincerely, Vivian Euzent

From: Dianne Miller (lkdda07@gmail.com)

July 15, 2018 21:02

To: d.wilkins@tcpud.org; jfriedman@tcpud.org; jpang@tcpud.org; r.treabess@tcpud.org; scottrzumwalt@gmail.com

Subject: TXC and Schilling Lodge Project Message:

Dear TCPUD Board of Directors, I have been a resident of the North Shore of Lake Tahoe and the Tahoe City area for 45 years. I am a dedicated community member and have supported many projects and improvements over the years. I am an avid cross country skier and spend many hours on the trails of Tahoe Cross Country. They provide a first class nordic center and contribute hugely to our local schools and children. I believe that the Schilling Lodge will be a wonderful addition to Tahoe XC and the local community. Please consider this incredible project and how it will enhance both the local and tourist experience.

From: Monica Grigoleit [shop@cobblestonetahoe.com]

July 17, 2018 11:27:19 AM

To: Kim Boyd

Subject: Tahoe XC

Hi Kim, I was at today's meeting and I do have a lot of additional questions. 1. Cost of each site? 2. How did site D get approved without us knowing? 3. How do we oppose current approved site? Where do I look for these answers?

Thanks, Monica Grigoleit

From: Monica Grigoleit [shop@cobblestonetahoe.com]

July 19, 2018 3:11 PM

To: Kim Boyd

Subject: Tahoe XC

Hi Kim, I have several questions and don't know where to go for the answers. 1) What are the costs associated with each different site? 2) How did TCPUD make it's final decision, was it a public vote or only a decision made by a board specifically for the Tahoe XC proposal?

Thanks, Monica Grigoleit

I76-13
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From: Alex Lesser [alex@pssclabs.com]

July 19, 2018 3:56 PM

To: Kim Boyd; Terri Viehmann; Sean Barclay; jfriedman@tcpud.org;

r.treabess@tcpud.org; jpang@tcpud.org

Subject: YESTERDAY'S MEETINGS

Hello Everyone I wanted to take a moment and just reflect on today's first EIR scoping meeting. First off I am pretty disappointed to see very few TCPUD Board Members in attendance. I want to ask first if TCPUD actually cares what the Highlands residents (or any Tahoe City) residents have to say? We received notification for this meeting almost a full month ago. There really is no reason that the entire TCPUD Board could not be in attendance. From what I understand there is only going to be one opportunity for the Public and TCPUD Board Members to engage in a back and forth. Is this correct? If so will there be any time limits? Will there be a limit to the number of questions? Is there any information TCPUD Board Members can provide now to help the public prepare for what seems to be the only time we can actually engage in a back and forth discussion. Next I would like to reiterate the questions I presented that were not answered. My expectation is that these questions will be answered at some point. Again if the TCPUD Board was in attendance perhaps we could have had a productive conversation rather than community vehemently voicing their objections to many aspects of this project with no one from TCPUD able to respond. If you take the time to review the video, I spend the majority of my time asking questions to the only person representing the TCPUD that appeared to be engaged.

It was stated that the main goals of this project were to do the following three things
 Improve the current layout of the Tahoe Cross Country Ski Lodge to better accommodate things like "storage"
 Provide more parking spaces
 Provide better traffic flow
 These items are directly from the presentation. I'd like to understand how much research has gone into these goals. For instance, how much storage is really needed? If expanded storage is main goal then great let's add some more storage. I highly doubt this means going from a 2400 sq ft structure to a nearly 10,000 sq ft structure. Next, how many days per year is there insufficient parking? Over the past few years the number of weeks that the Cross Country facility is actually open is on average 5 or 6 weeks. That means maybe 10 or 12 weekend days per year that there may be need for additional parking. And in terms of traffic flow, even the presentation noted that the current location of the Cross Country facility can be reconfigured to offer better traffic flow than the proposed location at Site D. I believe if the TCPUD can provide answers to the stated three main objectives, we can all find a solution that would be satisfactory to everyone involved. During my conversations with Highlands residents and neighbors no one has stated that they do not want the Cross Country facility to be improved. But let's make the right improvements for the right reasons.

Now, I'd like to make absolutely certain that in fact the three stated main goals are the only reasons for the proposed site change and lodge expansion. I would like to give TCPUD Board Members the opportunity now to tell the public if there are other reasons that were not stated on the PowerPoint Presentation or stated. I believe this is very important now for TCPUD to address this.

I76-13
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Because I only had 3 minutes to ask questions I didn't have a chance to address my real concern which is public safety. I have stated several times previously that I have very young children. My home sits around a blind turn. There are NO sidewalks on Polaris. There are NO streetlights next to my house. I later found out that one Tahoe City resident has her son hit by a car on Polaris as well as several pets killed by oncoming traffic. Two nights ago, there was an SUV driving 65+ MPH with two teenagers yelling out their car windows. I can only imagine what may happen if this new facility starts serving alcohol. Actually I would like this clarified, will alcohol be served at ANY event at the new Cross Country facility? The Highlands Residents continue to voice their disapproval of moving the location to Site D. The Highlands Residents have voiced support for improvements to the current Cross Country facility at the current site. When, not if, there is a serious accident due to increased traffic on Polaris, we will all be responsible for tragedy.

TCPUD Board Members can step forward now and show the community that their residents' safety comes first by removing Site D completely. I implore the TCPUD Board Members to consider if the situation was reversed and the residents of Tahoe City voted to put the Cross Country center in their backyard. I'm certain every TCPUD Board Member would oppose it as strongly as we are. I invite any TCPUD Board Member to pick up the phone and call me. My number is 562-810-5998. I really don't want until Summer 2019 for a productive discussion. We can have it now.

Alex Lesser

From: Carol Pollock [carolpollock10@gmail.com]

July 19, 2018 4:27 PM

To: Alex Lesser; Kim Boyd; Terri Viehmann; Sean Barclay; Judy Friedman; Ron Treabess; John Pang

Subject: RE: YESTERDAY'S MEETINGS

Dear Alex, Such good points. Because I was not able to attend, I watched the two NOP sessions and did not realize before there was not an occasion for discussion. And with only one Board member there, why bother? Like others I share the concern for safety. Our home is on Old Mill Road. I believe for the last session I provided photos of three accidents that took place on one winter day. It is dangerous in all seasons. I guess I need to resubmit with a summary of concerns: traffic safety, environmental issues and cost benefits of this expansion. I'd love to see the lodge improved by the Schilling lodge in its current location. And, to see parking and traffic flow improved, too. I've gone up to see the summer usage a number of times. Rarely more than 5-10 cars there. I do not understand the budgeted costs for studies, \$200,000 now and \$400,000 next yea, for a project that has no apparent building or operating budget.

Sincerely, Carol Pollock

From: Alex Lesser [alex@pssclabs.com]

July 19, 2018 5:00 PM

To: Carol Pollock Cc: Kim Boyd; Terri Viehmann; Sean Barclay; Judy Friedman; Ron Treabess; John Pang

I76-13
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Subject: Re: YESTERDAY'S MEETINGS Thank you Carol. We are a small community here in Tahoe City. TCPUD Board Members live here. I think we need to work together to address the three identified goals clearly identified at the meeting. In my view these are easily addressed with simple changes. I did not address any financial concerns because there is no amount of financial trickery that can make this lodge financially viable unless the lodge will be used for items beyond the stated goals. It would be great if TCPUD board members can give us a complete picture here.

Alex

From: Debbie White [debbie@mrooms.co.uk]

July 19, 2018 6:50 PM

To: Kim Boyd; Terri Viehmann; Judy Friedman; Matt Homolka; Dan Wilkins; Paul Niwano

Subject: The Schilling Lodge scoping meeting feedback

Kim et al Thank you for the presentation on Tuesday evening. It was good to put some faces to names on emails and to see the progression on this project. A couple of points to pick up on using your presentation points as my headline topics; - The Project will address existing operational deficiencies relative to circulation and parking This was stated in the presentation as part of the purpose of this lodge project.

As I said when I stood up, the rationale for moving to site D from site A has been lack of parking yet the presentation shown on Tuesday showed site D as having 100 parking spaces that is exactly the same as the modified site A option. So site D offers nothing more than the current site in terms of parking spaces (once modified). This further supports the need to stick with site A as the location to place the lodge and improve the current facility. There is also a viable concern that overflow parking at site D will result in cars being parked on Polaris or at the school, which will clog an already heavily trafficked area resulting in blocking traffic flow (as the road is already thin) and creating more safety issues. No outlet, safety when walking on Polaris, blocking fire access etc.. is already a serious concern without hindering it further. - Additional uses, as determined by the TCPUD, may also be proposed. The presentation states enhancing winter Nordic skiing, summer hiking & biking facilities, which we understand but 'additional uses, as determined by the TCPUD may also be proposed'; what does this mean? To include such an open statement is a worry. Can you clarify please? Does this encompass the license to host profit generating events such as weddings? If so, this is another concern given noise pollution, safety and traffic issues. This point must be clarified. - Maximize base elevation of lodge site Logically you would think this would make sense but the meadow at higher elevation is far more exposed to sunshine and snow melt, therefore not relevant.

There was also talk of site D having more snow than site A, but this is simply not true. This is a very weak point to rationalise site D over site A. - Environmental review 2 Land Use & community effects; site A is operational and site D is currently used for biking in the summer and partly for Nordic skiing in the winter. Should site D be chosen, biking through this area will no longer be possible as the area will be covered by a lodge & parking. This is my access to the forest out the back of my house, as it is for many people who use the trails for biking in the summer. Safety to continue to ride from house or car

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to trails will be compromised if site D is chosen. Scenic resources; the job of the TRPA and TCPUD is to maintain or enhance views of individual, existing scenic resources that are visible by the public. Site A exists and all boxes have been ticked for this subject. Site D location will result in considerable, catastrophic interference of our current views & landscape. The height of the building is not established (I believe, but could be wrong) so please clarify the height of the building at full or reduced project on site D. I understand max height limits range from 24 feet to 42 feet but additional height up to 56 feet is permitted for certain buildings. Hazards & public safety; Public safety is already a concern on Polaris so site D option will only increase this touchy subject. Nobody wants blood on their hands and this is a melting pot of potential disaster. Access, small street, huge traffic, increased traffic with the XC Lodge at site D, no street lights, no speed bumps, young drivers who think Polaris is a race track (kid you not & mostly those with loud exhausts to really advertise their speed as they fly by your house at 65 mph), a neighbourhood terrified alcohol will be served all contribute to alarming public safety issues at site D. Public services & utilities; site A has all utilities in place. Site D is starting from scratch. Waste of money, damages the environment, huge expense. No need.

Greenhouse gas and emissions & climate change; our planet is changing, we all know that but apparently 11% of all global greenhouse emissions caused by humans can be blamed on DEFORESTATION. Shockingly, this is exactly what site D proposal will do; clearance, or clearing of the forest or stand of trees behind Polaris so the land can be converted to a non-forest use (i.e. this Lodge project). That is not a fact anyone can ignore and the fact this is Lake Tahoe makes it even more shocking that site D is under consideration. Site A, has no impact on this.

The TCPUD need to do the right thing and stop all consideration of site D as the list of cons is just getting longer as time passes. Noise; Site A is far more protected from a noise point of view than site D. Events such as the schools mountain biking championships held early Sept that have a start and finish right about where Site D will be creates a level of noise not acceptable to the neighbourhood. We don't mind it now and then as we are all sports people and we encourage competition but constantly is not an option. One thing not on this list is the effect on flora & fauna; huge, devastation of existing flora and fauna at site D due to tearing up the great outdoors and paving it with a car park and placement of a lodge. Same for animals. Who is going to protect and speak for them? If anyone reading this still thinks site D is a good idea, you should not live in Tahoe. Over and out - I MUST get on my mountain bike!
Debbie White

From: Paul Navabpour [jakeaqu@me.com]

July 19, 2018 6:57 PM

To: Alex Lesser Cc: Kim Boyd; Terri Viehmann; Sean Barclay; Judy Friedman; Ron Treabess; John Pang

Subject: Re: YESTERDAY'S MEETINGS

Alex: Your points are spot-on. I found the meeting rather bizarre to stand at a podium without any of our representatives PRESENT to address our concerns.

I76-13
cont.

Having said that, I will address the TCPUD board with the following points for our family who live here year round and have children attending the school. To the TCPUD BOARD copied above: Environmental impact: CEQA's own slide presented a desire to study the environmental impact on many fronts for moving to the high school. Adding a HUGE driveway from Polaris, or even worse, from Cedarwood does not in any way comply to the objective of being mindful of an environmental impact. Overloading the high school/middle school area with traffic from BOTH Polaris OR Cedarwood is not acceptable. Our kids can't walk on Polaris to school. Our kids AMONG many others travel the trails to the school; add a "driveway" off Cedarwood, and you merely add more traffic to an overburdened corner where the school is and take away the peace of mind for those on bikes and on foot to get to and from school. Unnecessary to break ground, take down trees, affect seasonal creeks with such a HUGE project that will impact neighbors, our backyards, our front yards when the existing location already has the negative impacts absorbed. For the record, I propose a modified expansion and improvement to the TC XC center at it's current location; Far less impact, diverts traffic away from the "school corner" and won't affect us residents that purchased our homes accepting the issues of Polaris KNOWING that we backed up to an "open space" behind our homes free of car or bus traffic.

Regards, Paul Navabpour

From: Debbie White (debbie@mrooms.co.uk]
July 20, 2018 1:45 AM

To: Kim Boyd; Terri Viehmann; Judy Friedman; Matt Homolka; Dan Wilkins
Subject: Schilling Lodge follow up no 2 Kim et al

On my mountain bike ride tonight I went to the Tahoe XC & Snow Shoe Center (site A). I have obviously been there before but without sounding rude, the place is a mess with a total of 8 small outbuildings of all shapes and sizes dotted throughout the property. Stuff everywhere. I understand why those involved got excited at the prospect of a bigger, better, gifted lodge. But it seems feasible that given the opportunity, new life can be injected in to this existing site (A) to maximise the space available, hit project objectives and to clean up what is looking like a once loved Scout Hut from 1975! With careful planning, lower spend, no environmental impact or safety issues, the Schilling Lodge can take pride of place on the existing lot that will also include renovation of the current building plus 100 parking spaces (currently c. 50 that I counted tonight). This option is outlined as 'Proposed Site A - Modified Project' in the TCPUD Scoping document. The table I have done below shows marginal differences in Site D full project & Site A - Modified Project sizes. Small differences with big consequences.

It seems foolish to pursue Site D. Site D Full project size Site A Modified project size
10,154 sq ft reconstructed lodge inc. addition & basement 8, 661 sq ft (6229 sq ft
Schilling Lodge with basement sq ft renovation of existing clubhouse. 59,799 sq ft
parking & driveway coverage 55,803 sq ft parking driveway coverage 100 parking spaces
100 parking spaces Use; as you can see below only 2 of the list of uses for Site D full
project are not possible at Site A- Modified project. No family area or snowmobile car
port. Perhaps the meeting room can be used for a Family Area at Site A when not in use

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to overcome this hurdle. Do Snowmobiles have to live on site year round and maybe a temporary structure is possible in the winter. Neither are a disaster or a serious compromise. Site D Full project USE includes: Site A Modified project USE includes: Difference Ticket sales Retail Meeting room Ticket sales Retail Meeting room No family area No snowmobile car port 2 of 13 uses not possible at Site A-Modified Project 2 Café Rental Storage Staff area First aid Lockers Family area Gym/mtg space Snowmobile carport Community/outdoor space Café Rental Storage Staff area First aid Lockers Gym/mtg space Community/outdoor space Elevation; all this discussion, heartache, safety worry & concern to protect our beautiful Tahoe outdoors is for an additional 76' difference in elevation from Site A to Site D.

This is pitiful and a disgraceful waste of everyone's time, public money and effort. Site A planned use if not the TXC center. This has been raised throughout this process; what use is planned for Site A should Site D be the chosen? This question has not been answered, which is frankly astonishing. Having no plan for the space is a blatant waste of public money and has so many consequences. I realise all options must be considered but having a plan for Site A if Site D is chosen should be very much part of your internal discussion and planning process as surely that involves a level of spend and management too? You can't simply forget it in this equation. Once again, thank you for your time.
Debbie White

From: Janet Huff [huffmnty@aol.com]

July 20, 2018 9:02 AM

To: Judy Friedman; Ron Treabess; Dan Wilkins; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Kim Boyd; Terri Viehmann

Subject: REQUESTED EIR SCOPING ITEMS Dear

TCPUD Board & Staff Members, To reduce future challenges, please make sure the Environmental Impact Report (EIR) objectively and thoroughly answers all of the following questions in each of these analysis areas identified at the Public Scoping meetings:

Re Hydrology/water quality - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: change the drainage pattern of the site, or alter the course of a natural stream?

Re Geology and soils, land capability, and coverage - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: result in soil erosion or loss of topsoil, conflict with zoning of forest land or open space, convert forest land to non-forest use, or conflict with any land use, habitat conservation, or natural community conservation plan?

Re Scenic resources - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: adversely effect a scenic vista, degrade public views of the site or surroundings (i.e., create an eyesore), or produce a light source that would adversely affect day or nighttime views in the area?

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Re Biological resources - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: adversely affect sensitive or special status species, protected wetlands, interfere with resident wildlife movements, or conflict with policies protecting biological resources, including tree preservation?

Re Cultural resources - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: adversely and excessively modify a structure that is significant to Lake Tahoe’s cultural history?

Re Hazards and public safety - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: create public and environmental hazards through the routine transport, storage, and handling of flammable fuels and other hazardous materials that present a reasonable possibility of accidents within one quarter mile of schools, expose people and structures to increased wildfire dangers, or increase congestion of the only emergency evacuation route from two schools?

Re Public services and utilities - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: create a need for new/expanded facilities to maintain acceptable service levels, emergency response times (e.g., fire protection, law enforcement), and provide both the project and Highlands neighborhood with sufficient water supplies in normal and dry years?

Re Traffic and parking - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: increase the vehicle traffic upon the busiest street(s) in the Highlands during the winter months, endanger pedestrians (e.g., neighborhood children, gym classes) that routine use Polaris, Cedarwood, Old Mill, and Heather, increase the “rolling-stop” violations through the stop signs at Old Mill and Polaris, endanger drivers and residents on the slippery winter conditions on both Old Mill and Polaris, or dangerously increase congestion on the only emergency evacuation route from two schools?

Re Air quality -Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: contribute to a decrease in air quality in a residential and school neighborhood?

Re Greenhouse gas emissions - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: increase greenhouse gas emissions by adding up to one hundred more cars and several buses to the daily traffic in a residential and school neighborhood?

Re Noise - Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: generate a temporary or permanent increase in ambient noise levels in the area beyond those existing without the project?

Thorough analyses of the above are expected to reveal significant impacts, some of which may be unfeasible to mitigate, but people are willing to give the formal process a chance to work. Please let me know if you have any questions about the above requested action. Sincerely yours, Janet Huff

I76-13
cont.

From: Roger Huff [huffmtry@aol.com]

July 21, 2018 7:43 AM

To: Kim Boyd; Judy Friedman; Ron Treabess; Dan Wilkins; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Terri Viehmann

Subject: SPECIFIC EIR SCOPING REQUESTS - PLEASE CONFIRM RECEIPT

Dear TCPUD Board & Staff Members, The following are provided in response to your Public Scoping invitation to offer early input, comment on the scope of environmental issues and potential effects and alternatives to be considered in the EIR. The requested specific actions are intended strengthen the EIR and make the project more feasible, less divisive, and much more beneficial for a much larger segment of our community.

1. Please make the following corrections to the invalid and/or misleading statements in the Notice Of Preparation (NOP) and identified previously:

a. There currently are no such facilities as the Tahoe Cross-Country Lodge or Highlands Park and Community Center. Both these names are incorrect. b. The Proposed Project (i.e., Site D – Full Project) does not include any replacement or expansion of the above facilities. This is misleading. c. Use of the terms “public use” and “community use” are also misleading, because the proposed facility is designed specifically for TCCSEA/TXC membership/commercial operations use, not for the larger community.

2. Please also insist that the EIR provide thorough and objective answers to the following questions (taken from CEQA guidance documentation) regarding whether the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives would: have adverse effect on a scenic vista, degrade the existing visual character or quality of public views of the site and its surroundings, or create a source of light or glare that would adversely affect day or nighttime views in the area; generate a temporary or permanent increase in ambient noise levels in the project vicinity or a temporary or periodic increase in ambient noise levels in the vicinity above levels existing without the project; result in soil erosion or the loss of topsoil; conflict with existing zoning for, or cause rezoning of, forest land, result in the loss of forest land or conversion of forest land to non-forest use, or cause an environmental impact due to a conflict with any applicable land use plan, policy, or regulation violate any air quality standard or contribute to a net increase in an existing or projected air quality violation, generate greenhouse gas emissions, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases; create a hazard to the public or the environment through routine transport, use, or disposal of hazardous materials, create a hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, or expose people or structures, either directly or indirectly, to risk of loss, injury or death involving wild land fires including where wild lands are adjacent to urbanized areas or residences are intermixed with wild lands; have an adverse effect, directly or through habitat modifications, on any species identified as a sensitive or special status species, interfere with movement of any native resident or

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cont.

migratory fish or wildlife species or with established native resident or migratory wildlife corridors, conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or conflict with the provisions of a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan or conflict with any habitat conservation or natural community conservation plan; cause an adverse change in the significance of a historical resource; alter the existing drainage pattern of the site, including through alteration of the course of a stream through addition of impervious surfaces, or alter the existing drainage pattern of the site or area, including the alteration of the course of a stream; result in a need for new/altered governmental facilities, the construction of which could cause environmental impacts, to maintain acceptable service ratios, response times, or performance objectives for: fire protection, law enforcement, schools, or other public facilities; conflict with an applicable plan, ordinance or policy establishing measures of circulation system effectiveness, conflict with any congestion management program, including level of service standards and travel demand measures, or other standards or conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease performance or safety of such facilities; or result in inadequate emergency access; require or result in the relocation or construction of new or expanded water, or wastewater⁰ treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, or the expansion of existing facilities, in order to have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years; impair an adopted emergency response or emergency evacuation plan, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire; or expose people or structures to risks, including down slope or downstream flooding, landslides, from of runoff, post-fire slope instability, or drainage changes.

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3. And since Public Scoping solicits “Alternatives,” please replace the high-risk Site D – Alternate Driveway option with the following more realistic, less controversial, and more affordable Site A – Low Impact option that does not create the serious environmental impacts of the Proposed Project at Site D or currently proposed Alternatives: Change the title to the “Highlands Community Center Project,” and replace the existing Highlands Community Center with the original (4,607 sq. ft.) historic Schilling structure in the current Country Club Drive location; Only permit minimal internal and external changes required not just to meet basic needs of the TCCSEA/TXC, but also for other Community functions;

4. Reduce the parking lot size: by limiting its additions to those required to minimize on-street parking on an average winter day, and by using the smaller (2,814 sq. ft.) surface footprint of the Schilling structure; and

5. Transfer final ownership of the facility to the TCPUD for use as a true community resource, like the current Highlands Community Center. As always, if you have questions about any of the above, please contact me.

Very sincerely, Roger Huff

From: Carol Pollock [carolpollock10@gmail.com]

July 23, 2018 12:35 PM

To: Judy Friedman; Ron Treabess; Dan Wilkins; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Kim Boyd; Terri Viehmann

Subject: XC Lodge in the Highlands

My husband and I have a home on Old Mill Road, which we have owned for over twenty years. I would like to reinforce the need for traffic studies related to increased traffic on our street. I believe at the first comment meeting I provided photos of three accidents that took place directly below our home on one not terribly snowy day this winter. Exiting our driveway is risky in all seasons with the current traffic. Walking on Old Mill is equally dangerous and difficult. The school traffic is predictable and what existed when we purchased our home. The traffic increases and impacts just from the softball games on Thursday evenings is unbelievable. Not what we bargained for. In addition to traffic safety I am very concerned about environmental damage that will result in covering 50,000 square feet of open space with parking lots and 10,000 sq. foot new lodge. Not to mention the problems that will be encountered by neighbors in the proposed Site D. I am entirely in favor of improvements to the XC lodge in its current location, utilizing a smaller Schilling lodge, improving the parking and traffic flow for an average winter day.

One of our neighbors has suggested the following alternative:

- Replace the high-risk Site D - Alternate Driveway option with the following more realistic, less controversial, and more affordable Site A - Low Impact option that does not cause the environmental impacts of the Proposed Project at Site D or its currently proposed Alternatives;
- Change the title to the "Highlands Community Center Project," and replace the existing Highlands Community Center with the original (4,607 sq. ft.) historic Schilling structure in the current Country Club Dr. location;
- Only permit minimal internal and external changes to the original structure required not just to meet basic needs of the TCCSEA/TXC, but also for other Community functions;
- Reduce the parking lot size (and traffic load): by limiting its additions to those required to minimize on-street parking on an average winter day, and by using the smaller (2,814 sq. ft.) surface footprint of the Schilling structure; and
- Transfer the final ownership of the facility to the TCPUD for use as a community resource, like the current Highlands Community Center.

My neighbors also have pointed out areas of the study that need further clarification and identification. Those seem to be very appropriate to request. I have included them below:

To reduce future challenges, please make sure the Environmental Impact Report (EIR) objectively and thoroughly answers all the following questions in each of these analysis areas identified at the Public Scoping meetings July 17th:

- Re Hydrology/water quality: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: change the drainage pattern of the site, or alter the course

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of a natural stream? Re Geology and soils, land capability, and coverage: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: result in soil erosion or loss of topsoil, conflict with zoning of forest land or open space, convert forest land to non-forest use, or conflict with any land use, habitat conservation, or natural community conservation plan?

- Re Scenic resources: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: adversely effect a scenic vista, degrade public views of the site or surroundings (i.e., create an eyesore), or produce a light source that would adversely affect day or nighttime views in the area?
- Re Biological resources: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: adversely affect sensitive or special status species, protected wetlands, interfere with resident wildlife movements, or conflict with policies protecting biological resources, including tree preservation?
- Re Cultural resources: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: adversely and excessively modify a structure that is significant to Lake Tahoe’s cultural history?
- Re Hazards and Public Safety: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: create public and environmental hazards through the routine transport, storage, and handling of flammable fuels and other hazardous materials that present a reasonable possibility of accidents within one quarter mile of schools, expose people and structures to increased wildfire dangers, or increase congestion of the only emergency evacuation route from two schools?
- Re Public services and utilities: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: create a need for new/expanded facilities to maintain acceptable service levels, emergency response times (e.g., fire protection, law enforcement), and provide both the project and Highlands neighborhood with sufficient water supplies in normal and dry years?
- Re Traffic and Parking: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: increase the vehicle traffic upon the busiest street(s) in the Highlands during the winter months, endanger pedestrians (e.g., neighborhood children, gym classes) that routine use Polaris, Cedarwood, Old Mill, and Heather, increase the “rolling-stop” violations through the stop signs at Old Mill and Polaris, endanger drivers and residents on the slippery winter conditions on both Old Mill and Polaris, or dangerously increase congestion on the only emergency evacuation route from two schools?
- Re Air quality: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: contribute to a decrease in air quality in a residential and school neighborhood? Re Greenhouse gas emissions: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: increase greenhouse gas emissions by

I76-13
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adding up to one hundred more cars and several buses to the daily traffic in a residential and school neighborhood? Re Noise: Would the Proposed Project (i.e., Site D – Full Project) or any of the Alternatives: generate a temporary or permanent increase in ambient noise levels in the area beyond those existing without the project?

Finally, as a Tahoe taxpayer I am astonished that this project can proceed to this point without a building budget and operating budget. How can that be? And, how can so much money be spent for studies on a significant project that has no funding requirements that have been identified.

Very sincerely, Carol Pollock

From: Huff [mailto:huffmstry@aol.com]

July 23, 2018 2:29 PM

To: Kim Boyd <kboyd@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; Ron Treabess <r.treabess@tcpud.org>; Dan Wilkins <d.wilkins@tcpud.org>; John Pang <jpang@tcpud.org>; Scott Zumwalt <scottrzumwalt@gmail.com>; Sean Barclay <sbarclay@tcpud.org>; Matt Homolka <mhomolka@tcpud.org>; Terri Viehmann <tviehmann@tcpud.org>

Subject: Re: SPECIFIC EIR SCOPING REQUESTS - PLEASE CONFIRM RECEIPT

Hi Kim,

A number of people would like to see their inputs also discussed during the upcoming Board meeting, and feel strongly about it. What would it take to make it an official agenda item?

Roger

In a message dated 7/23/2018 2:02:24 PM, kboyd@tcpud.org wrote:

Thank you Roger.

These comments will also be considered in preparing the Draft EIR analysis and have been shared with Board and staff. They will be included in the August 17th, 2018 Board packet.

Kim Boyd Senior Management Analyst, Tahoe City Public Utility District

From: Don Heapes [donheapes@tahoexc.org]

July 24, 2018 12:33 PM

To: Kim Boyd Subject: TCCSEA Lodge Replacement Scoping Comments
Kim... I am hoping the criteria for determining significant impacts in CEQA scoping are stated up front in the process and not at the back end after data has been collected.
Thanks...Don Heapes

From: Ted Gomoll [tedgomoll@gmail.com]

July 24, 2018 2:43 PM

To: Kim Boyd

Subject: Tahoe Cross - Country Lodge

I76-13
cont.

Hi Kim, I am following up on the meeting held 7/17/18. I have been a Highlands property owner since the early 1990's. I strongly believe that the new lodge should not be located in our residential area whether the high/middle school location or current location. The construction traffic will be dangerous and very disruptive. When the new high school was built, construction trucks were travelling our streets all hours of the day and night seven days a week. The noise was unbearable in a residential area. Therefore the best location would be the north side of State Hwy. 28 next to the new bike trail and the TART stop across from the entrance to Dollar Point. This would be far less disruptive to our residential community and very accessible year around for all types of users. Virtually no road construction would be necessary and a large parking lot could be constructed with minimal negative environmental impact. It would be easy to construct a trail from the Hwy 28 location to the current trail network. The existing lodge could remain as gathering area, warming area with restrooms and the parking lot would not need to be enlarged. Most Highlands property owners support my recommendation and would be willing to sign a petition to the TCPUD board supporting the Hwy 28 location. Possibly a few Highlands property owners should meet with the TCPUD board to discuss the Hwy 28 location alternative.

Best regards, Ted Gomoll

From: John Sutter [John@johnsutterrealestate.com]

July 24, 2018 6:38 PM

To: Kim Boyd

Subject: Comments

Hi Kim, We are the owners of 3075 Highlands Court and would like to add comments to the environmental topics. We believe the High School location would be the best location and have the lowest negative effect on the quality of life for Highlands' property owners. As far as the "increased traffic" on Polaris, wasn't it busier 10-15 years ago when the schools were full and we had more full time residents? I have been a real estate agent here for 28 years. Whenever I showed homes on Polaris I would disclose "you will have more traffic than other streets... but the best snow removal!" This fact is well known for all locals and for parcel owners to complain after the fact is disingenuous. The high school location would not put the facility right in the face of the adjoining neighbors, (including my parcel), as the plan to place/expand the current location would. I believe the value of our parcels would be diminished as, instead of looking at the fairway, we would be looking at a huge complex. The new location at the high school would be farther away from existing homeowners parcels besides the bonus of a higher elevation for snow operations. As a contractor, I recall that coverage could be swapped. Would it not be advantageous to use the existing coverage the Country Club parcel has, to transfer to the new high school location? Another factor which should be addressed is the noise and time of any operation. We live in a "residential" area. We should not be inundated by noise or lights before 7:00 am. (preferably 8...)

Thank you for your efforts! John and Linda Sutter 1

From: Ray Garland [raygarland2@gmail.com]

July 25, 2018 12:53 PM

To: Kim Boyd

I76-13
cont.

Subject: ISSUES SURROUNDING SITE "A" - TXC Lodge Expansion

Hi Kim, Before the deadline later today, I wanted to point out some issues regarding alternative site "A". At the public scoping meeting, I was asked by one of the TXC Board members why they had not heard from neighbors surrounding the current facility. The main reason is that so much publicity and emphasis has put on the preference for site "D" near NTHS that they don't think they are in any danger of site "A" ending up as the site selected for the expansion. However, should site "A" be selected, I think I can assure you that there would be a large outcry and opposition from neighbors on Country Club, Highlands Dr., Village and Cedarwood. The expansion, even at the reduced size, plus expanding the parking lot to 100 spaces would move the lodge up the hill directly behind houses on Village and Cedarwood. TXC initial research indicated it would have a negative sightline impact on more houses near site "A" than site "D". So you could certainly expect to hear from residents so affected. In addition, the large number of trees that would have to be removed would be objected to by residents on the aforementioned streets.

Sincerely, Ray Garland 3165 Cedarwood Drive

From: Stephanie Schwartz [stephandmike@hotmail.com]

July 25, 2018 4:33 PM

To: Kim Boyd

Subject: Comments about the proposed TCXC lodge replacement

Kim, After attending many meetings over the years (beginning with the first meeting in the yurt 4 years ago) I think the 2 main reasons that the TCCSEA wants the lodge to be relocated to Site D are: 1. The potential for more snow 2. Easier access for beginner and disabled skiers Neither of these issues can justify the environmental impact that will ensue if the lodge is moved from its original site (Site A) to the proposed site (Site D).

1. The elevation gain at Site D is 76 feet. Site A sits at 6560' and Site D sits at 6636'. The amount of snowfall is equal. I ski on those trails daily and I can tell you with absolute certainty that when the snow is melting at the existing site it is also melting at the proposed site. When dirt is showing, it is showing in both places. Equally. The only way to ensure more snowfall would be to move the TCXC center above 8000'. This insignificant elevation gain does not justify paving a driveway, paving 100 parking spaces or building a 10,000 square foot building on existing meadows and forest.

2. I understand the hill makes it challenging for beginner skiers and handicapped skiers, however, please note that beginner skiers and handicapped skiers ski at the downhill ski resorts daily. I think reworking that slope above the existing site (Site A) will make far less environmental impact than what is proposed for Site D. I think the best way to solve the environmental impact problem is to keep the lodge where it is, Site A. Create a beautiful, accessible lodge for all skiers. The title of your web page says it perfectly - Tahoe Cross Country Lodge Replacement, replacement NOT relocation.

Thank you, Stephanie Schwartz Highlands Homeowner

From Julie Basile

July 25, 2018

I76-13
cont.

To: Kim Boyd

Subject: Tahoe Cross-Country Lodge Replacement and Expansion Project - EIR

Dear Ms. Boyd: Thank you for the opportunity to provide comments on the Notice of Preparation for the Tahoe Cross-Country Lodge Replacement and Expansion Project . I appreciate that the Tahoe City Public Utility District has shown such a great capacity for listening to the community. I have written previous comment letters regarding this project, but it is my understanding that these comments should be provided during the environmental review process. Please accept my apology for any repetition. I have a few thoughts regarding the project objectives and many concerns about the potential impacts associated with Site D - alternative driveway.

A. Project Objectives 1. Does the Tahoe City Cross Country Center need an expanded facility? I have been a pass holder at the cross country center for many years and I try to utilize the trails several times a week. In the last few years, unfortunately the weather has not cooperated and the cross country ski season has been fairly minimal (except for last year). The center is not always able to open over the Christmas holiday when many visitors come to the area. Many of the traditional races such as the Great Ski Race continue to be cancelled. Although snowmaking would make skiing possible, the large amount of area to cover verses the price of a trail pass do not seem to support snowmaking like the downhill ski resorts. If the new facility costs the Cross Country center more to operate, will it still be sustainable? If year after year, people don't use their passes more than a few times, will they continue to buy them? I am sure there are some yearly costs that must be paid such as insurance, equipment, staff etc that must be paid regardless of whether the facility opens or not. An expanded facility would require a higher operating cost and if Mother Nature doesn't cooperate, that could be more of a burden than a benefit. I would hate to see the Cross Country center become economically unviable. There are many locals that use this area to exercise every single day. This is not my area of expertise and really none of my business, but an important question to be asked. 2 Who is this expansion intended to serve? Are we trying to draw a huge number of visitors to this area? Does this change the experience that we currently enjoy and is that worth the financial benefit? Is the project proposed this way because the lodge was gifted and happens to be larger or does the facility need to be this size? I only bring this up because Squaw Valley added a fancy Village with lots of great places to eat, shops and places to stay and now it is very difficult to enjoy a day on the mountain on the weekend or a holiday when the kids don't have school. This area is a perfect example of a traffic issue. It is not only the residents that complain, I hear second home owners and visitors expressing their disappointment with their experience.

My understanding was that this upgrade was intended to support the education component. If this is the case, shouldn't it be a part of the high school? Shouldn't it be accessed in the same way as the school? If this is the case the alternate driveway through Cedarwood Drive does not appear beneficial. 2. Is this the highest and best use of the Schilling lodge gift? Is it possible or beneficial to upgrade the existing lodge and use the Schilling lodge in a different place? If the Schilling lodge is not the best fit for Tahoe City Cross Country because of its increased size, is it possible to use the Schilling lodge for another community project and perhaps give some of the money that would have been

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spent for a new facility back to the Cross Country Center to update their existing facility? Could it be used for the Fire Station site in town if there is an art center or conference center there? What about at the golf course for the new ice rink? Could it be incorporated into a new recreation center? Is it possible that it could be a ski destination out in the woods that could add an additional amenity to the Cross Country Center? Could it be a part of a system of lodges that people hike to and could provide an additional recreation opportunity in the basin? They have this system in New Zealand and it is pretty incredible. People in our community really want recreation experiences that are not already provided in our town. Many families commute to Truckee and Reno to provide recreational opportunities for their children several to five times a week. Pool Facilities, gymnastics gyms and covered/ indoor field space would be a huge benefit to our community.

B. Site D - alternative driveway The alternative evaluating a proposed “driveway” from the end of Cedarwood Drive to the project site creates at least 7 environmental impacts to avoid the traffic impact to a portion of Polaris Road. I have listed a minimum of the categories below and some of the sections that are applicable. Please note that this is in no way a complete list but a starting point. The proposed alternative driveway appears environmentally offensive, not cost effective and downright dangerous to residents of Cedarwood Drive and all of the Highlands residents that utilize that street for exercise.

1. Aesthetics
 - a) Have a substantial adverse effect on a scenic vista?
 - b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
 - c) Substantially degrade the existing visual character or quality of the site and its surroundings?
 - d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
2. Agriculture and Forestry Resources
 - d) Result in the loss of forest land or conversion of forest land to non-forest use?
3. Biological
 - b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?
 - e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
4. Hydrology / Water Quality
5. Land Use / Planning
 - b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? Association of Environmental Professionals 2017 CEQA Guidelines Appendices 291 Potentially Significant Impact Less Than Significant with Mitigation Incorporated Less Than Significant Impact No Impact
 - c) Conflict with any applicable habitat conservation plan or natural community conservation plan? XI. MINERAL RESOURCES. Would the
6. Noise
 - c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
 - d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
7. Recreation
 - b) Does the project include recreational facilities or require the construction

I76-13
cont.

or expansion of recreational facilities which might have an adverse physical effect on the environment?

8. Transportation/Traffic c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Discussion At this time, Cedarwood is a very quiet street, one in which I know almost every car and the only time it is really ever busy is when there is a band meeting at Mr. Norby's house. It is a street that many of the Highlands residents use to walk their dogs during the winter months and the children play and ride their bikes without fear that they will be hit by a car. The back yard is a different story. It is full of skiers cruising by enjoying themselves. Will their outdoor experience be any different if they are listening to the sound of buses going by instead of the quiet of the forest?

What about the residents on Polaris that have traffic in front of their house but they back to Conservancy lands? Is this an appropriate alternative to take that away and put traffic in the back of their house too? That section of trail is highly used recreationally. Is a new road appropriate in this area that has a creek? As a resident of the Tahoe Basin, and a TCPUD customer I hope that the final approved project respects our environment as well as our community. Thank you for this opportunity to comment.

Sincerely: Julie Basile

From: huffmtry@aol.com

July 26, 2018 3:06:53 PM

To: mhomolka@tcpud.org

Cc: kboyd@tcpud.org, jfriedman@tcpud.org, r.treabess@tcpud.org, d.wilkins@tcpud.org, jpang@tcpud.org, scottrzumwalt@gmail.com, sbarclay@tcpud.org, tviehmann@tcpud.org

Subject: Re: SPECIFIC EIR SCOPING REQUESTS - PLEASE CONFIRM RECEIPT

Hi Matt,

We discussed value of the public hearing their inputs and questions formally discussed by Board Members, and the proposed Alternative would eliminate many of the major concerns expressed by residents on July 17th. Some questions they asked do not fit neatly into an EIR, but are nevertheless still important to the feasibility (and credibility) of this project.

Cheers, Roger

In a message dated 7/26/2018 1:21:02 PM, mhomolka@tcpud.org wrote:

Roger,

We have received a lot of input during the NOP public scoping period, which as you know closed yesterday. In the next few weeks our team will be reviewing and considering the comments and input we have received. If we conclude that the list of alternatives should be revised, we will bring that to the Board for discussion and their approval. Otherwise, we have no need for Board action until later in the EIR process. Without staff doing so, the only other way to get a specific item added to the agenda is for a Board member to request it. I can appreciate and completely understand your and others strong desire for answers and continued discussions; they will come. I would just

I76-13
cont.

ask that you give us the time to provide you with well informed and detailed answers and information in the Draft EIR.

Thanks,

Matt Homolka, P.E. District Engineer/Assistant General Manager TCPUD

From: Roger Huff [huffmtry@aol.com]

August 14, 2018 7:26 AM

To: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Kim Boyd; Terri Viehmann

Subject: TRAFFIC STUDY CONCERNS

Good Morning, A number of Highlands residents reported seeing "Traffic Study" vehicles last Friday (August 10th) afternoon, when there was no school, staff, faculty, or parent traffic; and most residents were eating supper. What specifically are these data snapshots supposed to represent?

Regards, Roger

From: Debbie White [debbie@mrooms.co.uk]

August 15, 2018 10:42 AM

To: Kim Boyd; Terri Viehmann; Matt Homolka; Judy Friedman; Bob Bolton; Dan Wilkins

Subject: Traffic study, Friday 10th August 2018 on Old Mill, Tahoe City

Kim Hi. I'm sure all of you have seen this picture by now but can you tell me what this study was for or part of? I think the worry from our neighbourhood is that it will be used to justify the Schilling Lodge Site D option using traffic study figures that don't truly represent traffic flow when school is in use. Can someone explain this process?

Thank you. Debbie White

NOTE - Due to format conversion issues the picture mentioned in the above email could not be legibly displayed

On 08/16/2018 12:01, **Kim Boyd wrote:** Good afternoon Debbie, The traffic analysis will be detailed in the Traffic Study, which will be included in the Draft EIR when published. These details will include all dates, purposes, and results of traffic analyses done throughout the year. Kim Boyd Senior Management Analyst Tahoe City Public Utility District

From: Debbie White [debbie@mrooms.co.uk]

August 16, 2018 12:37 PM

To: Kim Boyd; Terri Viehmann; Matt Homolka; Judy Friedman; Dan Wilkins; Sean Barclay

Subject: Re: Traffic study, Friday 10th August 2018 on Old Mill, Tahoe City

Kim Thank you. So can you tell me how many dates are planned?

Kind regards, Debbie

From: Roger Huff (huffmtry@aol.com)

I76-13
cont.

August 16, 2018 12:13:32 PM

To: Kim Boyd; Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Terri Viehmann

Subject: Re: TRAFFIC STUDY CONCERNS

Thanks, Kim I know there were a number of concerns about the data sampling in the 2016 Traffic Study, and residents want to guard against cherry-picking non-representative measurements that once again don't include both vehicle and pedestrian counts on Polaris Road between the schools and Heather Lane on regular school days, weekends, and special events. This is extremely important to the validity and credibility of the EIR.

Cheers, Roger

From: Kim Boyd

August 16, 2018 12:03:50 PM

To: Huff; Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Terri Viehmann

Subject: RE: TRAFFIC STUDY CONCERNS

Good afternoon Roger, The traffic analysis will be detailed in the Traffic Study, which will be included in the Draft EIR when published. These details will include all dates, purposes, and results of traffic analyses done throughout the year.

Kim Boyd Senior Management Analyst Tahoe City Public Utility District

From: Alex Lesser [alex@pssclabs.com]

September 30, 2018 7:51 PM

To: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Kim Boyd; Terri Viehmann

Subject: Some Economic Questions

Hello I'd like to ask the following questions below. Please respond that the questions have been received and will be responded to in a timely manner.

1. Is it true the Donor (Mr. Mozart) paid for deconstruction, is paying for its storage, and offered to pay \$1 Million for re-construction of the former Schilling residence?
2. What is the total, maximum amount of public (e.g., taxpayer) funding estimated to be required, budgeted, and allocated to support the project review and approval process?
3. If the proposed facility would continue to be owned and used primarily for the benefit of the Applicant, how much would the Applicant contribute to the property tax base?
4. Has there been any objective, independent, analysis that indicates if or how operation and maintenance of the proposed facility is economically feasible?
5. If ownership of the proposed facility would be turned over to the TCPUD, how would its estimated operating and maintenance costs affect taxes and fees in the community?

From: Kim Boyd

October 02, 2018 1:51 PM

To: Alex Lesser Cc: Sean Barclay; Matt Homolka; Terri Viehmann

Subject: RE: Some Economic Questions

I76-13
cont.

Alex, Thank you for your email, it has been received and will become part of the Project record. Additionally, it has been shared with the TCPUD Board and Project team, and will be included as correspondence in our Oct 19th Board packet. You raise good questions, most of which will be addressed in the Draft Environmental Impact Report (EIR) (anticipated to be released in Feb/March 2019) or during the EIR approval process. Thank you, Kim Boyd Senior Management Analyst Tahoe City Public Utility District

From: Roger Huff [huffmtry@aol.com]

October 09, 2018 8:05 AM

To: Dan Wilkins; John Pang; Judy Friedman; Ron Treabess; Scott Zumwalt Cc: Sean Barclay; Matt Homolka; Kim Boyd; Terri 2 Viehmann

Subject: TCCSEA/TXC LODGE PROJECT ECONOMIC QUESTIONS

Dear Board Members, Meeting and correspondence records show that a number of members of our community have raised serious concerns about the economic aspects of the subject project, and key questions appear to remain unanswered. To remedy this, please answer the following:

1. What would happen to this project if the current funding for the storage and the reconstruction of the original historic structure goes away?
2. How much are the permits, fees, site preparation, modifications and additions, and construction of the proposed project currently estimated to cost, and how does the Applicant plan to pay for this?
3. Since virtually all the proposed additions and modifications are designed mainly for the use of TCCSEA members or TXC commercial activities, how would the Applicant pay for the proper maintenance and operation of the proposed facility when environmental conditions (e.g., lack of snow) prevent the latter?
4. Will community members who don't belong to the TCCSEA or use the TXC services be asked in any way to pay for the maintenance, operation, or protection of the proposed facility?
5. Wouldn't a far less ambitious and more modest facility be less controversial and more economically feasible than any of the currently proposed alternatives? A number of people are very interested in Board members' answers to the above, so I very strongly encourage you to reply within the next week or so. As always, I'm glad to help you disseminate that information if you wish.

Regards, Roger

In a message dated 10/9/2018 10:15:33 AM, **kboyd@tcpud.org writes:** Roger, Thank you for your email, it has been received and will become part of the Project record. Additionally, it has been shared with the TCPUD Board and Project team, and will be included as correspondence in our Oct 19th Board packet. You raise good questions, most of which will be addressed in the Draft Environmental Impact Report (EIR) (anticipated to be released in Feb/March 2019) or during the EIR approval process. Thank you, Kim Boyd Senior Management Analyst Tahoe City Public Utility District

From: Roger Huff [huffmtry@aol.com]

October 09, 2018 1:28 PM

I76-13
cont.

To: Kim Boyd Cc: Sean Barclay; Matt Homolka; Terri Viehmann; Dan Wilkins; Judy Friedman; John Pang; Ron Treabess; Scott Zumwalt
 Subject: Re: TCCSEA/TXC LODGE PROJECT ECONOMIC QUESTIONS
 Kim, Thank you. Board members may want to give answering these questions priority, because several residents have already questioned why public funds are being spent for staffing a CEQA process before such basic economic issues have been thoroughly addressed. I've reviewed the EIR guidance, and don't recall it covering these economic areas. Cheers, Roger

Note - In addition to the preceding correspondence, the TCPUD has verbally been asked questions about the project's funding plan and economic feasibility by Msrs. Swift and Navabpour and during Board meetings.

From: Alex Lesser [alex@pssclabs.com]

October 22, 2018 12:54 PM

To: Kim Boyd Cc: Sean Barclay; Matt Homolka; Terri Viehmann

Subject: Re: Some Economic Questions

Board Members, Your reading file for last week's meeting included correspondence from several residents including myself asking you to answer specific questions regarding the economic feasibility of the TXC Lodge Project. The staff reply implied that these issues would be addressed during the draft EIR review, but these economic issues are not part of the "environmental" review process. Are you going to answer these questions or not?

Regards, Alex Lesser

On Oct 22, 2018, at 1 :50 PM, **Kim Boyd wrote:** Alex, Thank you for your email, it has been received and will become part of the Project record. Additionally, it has been shared with the TCPUD Board and Project team, and will be included as correspondence in our Oct 19th Board packet. You raise good questions, most of which will be addressed in the Draft Environmental Impact Report (EIR) (anticipated to be released in Feb/March 2019) or during the EIR approval process.

Thank you, Kim Boyd Senior Management Analyst Tahoe City Public Utility District

From: Roger Huff (huffmstry@aol.com)

October 24, 2018 2:17 PM

To: judy@tahoepapertrail.com; Dan Wilkins; John Pang; Ron Treabess; Scott Zumwalt

Cc: Terri Viehmann

Subject: CREDIBILITY

Dear Board Members, At least four different individuals have asked very serious questions about economic issues pertaining to the TXC Project at TCPUD meetings and in written correspondence; and several emails on the subject in the Reading File weren't discussed during last week's Board meeting. People were told that their economic concerns would be addressed as part of the environmental review process, but this is not likely. I strongly encourage you to answer all their economic questions now, because one consequence of not doing that will be irreparable damage to District and Board credibility. Please do not let this happen.

Thank you, Roger

I76-13
cont.

From: Roger Huff [huffintry@aol.com]

October 31, 2018 7:52 AM

To: Dan Wilkins; Judy Friedman; John Pang; Ron Treabess; judy@tahoepapertrail.com; Scott Zumwalt Cc: Sean Barclay; Matt Homolka; Kim Boyd; Terri Viehmann

Subject: PLEASE ANSWER THESE ECONOMIC QUESTIONS

Dear Board Members, Please don't put off answering the economic questions about the TXC Lodge Project asked by Ms. Pollock, Mssrs. Lesser, Navabpour, Swift, and others any longer. The NOP states that the TCPUD's objectives include to: "preserve financial accountability and transparency of TCPUD property tax funds," and also clarifies that the EIR won't address these economic issues. Please answer these economic questions now. Thank you, Roger

In a message dated 10/31/2018 9:09:12 AM **sbarclay@tcpud.org wrote:** Dear Roger, Thank you for your email. Staff continues to work towards gathering information both for the preparation of the environmental review, as well as to identify economic impacts and evaluate potential options for business arrangements between TCPUD and Tahoe XC/TCCSEA. Items currently under evaluation for that second topic include building ownership scenarios, maintenance and operations scenarios, and other operational and administrative items related to the project. Staff is working towards presenting these scenarios as an agenda item at the March 2019 TCPUD Board meeting for public input and discussion by the board. This discussion will help clarify and establish expectations well in advance of any board action related to the environmental review or approval of the project, which is currently scheduled for the fall of 2019. We will do our normal extensive outreach to the neighborhood prior to the meeting, when it is confirmed. Sincerely, Sean Barclay General Manager Tahoe City Public Utility District

I76-13
cont.

From: Roger Huff [huffintry@aol.com]

November 05, 2018 6:59 AM

To: Sean Barclay

Subject: FOLLOW UP QUESTIONS

Good Morning Sean, I shared your response with folks posing these economic questions, and over the weekend was asked: (a) if the Board members have actually seen them yet, and (b) if you intend to include an agenda item for the Board to discuss their concerns during the next meeting? Please let me know, Roger

From: Sean Barclay

November 08, 2018 4:35 PM

To: 'Huff'

Subject: RE: FOLLOW UP QUESTIONS

Hello Roger, a) Yes, the board members have seen and read all of the correspondence regarding the economic questions. b) There will be no specific item on the agenda for the November Board meeting for the Board to discuss these concerns. However, all of the correspondence we have received will be included in the Board packet and can be discussed by the Board under the Correspondence portion of the agenda. As always, you or any other member of the public is welcome to attend the Board meeting and speak to

the Board under the Public Comment section. Sincerely, Sean Barclay General Manager
Tahoe City Public Utility District

From: Paul Navabpour [jakeaqua@me.com]

November 09, 2018 8:53 AM

To: Sean Barclay Cc: Kim Boyd

Subject: XC Center-CONCERNS not being addressed

Hi Sean, Hope you are well For the record, we live on Polaris. We have kids attending NT Middle School. And are HUGELY opposed to the move to the location adjacent to the high school. Help me understand your approach and direction! -Paul

To reiterate from earlier communications: Environmental impact: CEQA's own slide presented a desire to study the environmental impact on many fronts for moving to the high school. Adding a HUGE driveway from Polaris, or even worse, from Cedarwood does not in any way comply to the objective of being mindful of an environmental impact. Overloading the high school/middle school area with traffic from BOTH Polaris OR Cedarwood is not acceptable. Our kids can't walk on Polaris to school. Our kids AMONG many others travel the trails to the school; add a "driveway" off Cedarwood, and you merely add more traffic to an overburdened corner where the school is and take away the peace of mind for those on bikes and on foot to get to and from school. Unnecessary to break ground, take down trees, affect seasonal creeks with such a HUGE project that will impact neighbors, our backyards, our front yards when the existing location already has the negative impacts absorbed. For the record, I propose a modified expansion and improvement to the TC XC center at it's current location; Far less impact, diverts traffic away from the "school corner" and won't affect us residents that purchased our homes accepting the issues of Polaris KNOWING that we backed up to an "open space" behind our homes free of car or bus traffic.

Paul Navabpour

From: Roger Huff (huffmtry@aol.com)

November 09, 2018 12:17 PM

To: Judy Friedman; Dan Wilkins; Ron Treabess; Sean Barclay; Kim Boyd; Matt Homolka; Scott Zumwalt Terri Viehmann

Subject: TCPUD Parks & Recreation Meeting - 11/13/18 -AGENDA ITEM

Requirements creep should raise a red flag, and funding yet another Traffic Study that also overlooks major areas of concern like pedestrians, gym classes, and emergency evacuation route congestion on the portion of Polaris between the schools and Heather make no sense. Please discuss these during next Tuesday's meeting.

Thank you, Roger

From: Roger Huff (huffmtry@aol.com)

November 11, 2018 2:23 PM To;

Judy Friedman; Dan Wilkins; Ron Treabess; Scott Zumwalt; John Pang Sean Barclay; Matt Homolka; Kim Boyd; Terri Viehmann As a former program manager and government contractor, I very strongly advise against approving the proposed Amendment No. 1 to the Ascent contract because: (1) impacts of access to the schools

I76-13
cont.

and Highlands Community Center are not beyond scope of the initial Work Statement, (2) funding a Traffic Study that doesn't include actual vehicle counts, speed measurements, pedestrians, and gym class usage, and school emergency evacuation route congestion upon the segment of Polaris between the schools and Heather will be a waste of money and invalid, and (3) "requirements creep" like this destroys projects. Do not do this. Regards, Roger This amendment request includes additional work required for alternatives evaluation, the traffic analysis, including evaluation of retaining Highlands Community Center for alternatives at Site D, and impacts on access to the school.
Cheers, Roger

From Carol Pollock [carolpollock10@gmail.com]

November 12, 2018 8:41 AM

To: Dan Wilkins; John Pang; Judy Friedman; Ron Treabess; Scott Zumwalt; Sean Barclay; Matt Homolka; Kim Boyd; Terri Viehmann

Subject: Traffic study for XC lodge on Board agenda this Friday

Please do not approve the proposed Amendment that funds another inadequate traffic study for the XC Lodge. We need a real study that takes into consideration the actual conditions that exist in the Highlands, particularly on Old Mill and Polaris. My house is on Old Mill and each year we watch accidents up and down Old Mill, generally in winter, but other times of year. It's dangerous at all times, worse for pedestrians, like kids trying to walk to school. Many of the kids take a shortcut through our property and others when there's no snow. We're okay with this. Yes, it's shorter, but it's also far safer.

Unfortunately I cannot attend the meeting to object to this study in person. I hope you'll do the right thing. If any of you have kids that go to the High School and Middle School you must know how dangerous traffic already is on these streets. Please authorize funds for a study that documents reality at the time of year-in the winter with snow and ice. Thanks for your consideration. Sincerely, Carol Pollock

From: Roger Huff [huffmtry@aol.com]

November 13, 2018 8:37 AM

To: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt Cc: Sean Barclay ; Matt Homolka ; Kim Boyd ; Terri Viehmann

Subject: OBJECTIONS TO THE PROPOSED TXC CONTRACT AMENDMENT
TCPUD Board Members: As evidenced by the following quotes from the existing EIR Scope of Work, the proposed contract Amendment is unneeded and unwise because: (1) Alternatives at Sites A and D and the Highlands Community Center are already addressed, and (2) the current contract agreement requires a more thorough Traffic Analysis than stipulated in the Amendment.

“Project Understanding

The proposed Tahoe Cross Country Lodge Replacement and Expansion Project would reconstruct the Highlands Park and Community Center (Tahoe Cross Country Lodge, Tahoe XC Lodge) owned by the Tahoe City Public Utility District (TCPUD). The increase in square footage of the recreation building is sufficient to require TRPA Governing Board approval of the project. The reconstructed lodge would be

I76-13
cont.

approximately 10,150 square feet, substantially larger than the existing 2,273-square foot lodge. The District and TCCSEA have initially evaluated the feasibility and desirability of five reconstruction sites (Sites A through E), including the location of the existing lodge. From that analysis emerged the selection of three project alternatives, Site A, Site D, and a no Project alternative. The Work Plan considers analysis of up to two sites, including the existing site (Site A) and the proposed site (Site D), and a modified alternative such as an optional access route.”

Key Issues The Highlands community is a residential area, consisting of permanent and part-time residents, and also contains North Tahoe High School, North Tahoe School, and the Tahoe Cross Country Lodge. This community has expressed concerns about existing levels of traffic and other activity associated with the Tahoe Cross Country Lodge and nearby schools, and the proposed project serves to heighten those concerns, particularly as it relates to traffic on Polaris Road and other local roads, parking supply, traffic noise, lodge and event noise, and increased visitation. Transportation/Traffic Existing traffic, primarily associated with the North Tahoe High School and North Tahoe School, and parking issues in the Highlands community are a concern for local residents.

This scope includes evaluation of Sites A and D, for both winter and summer conditions. If changes to the project or other requirements other than those described below indicate the need to revise this analysis, the additional work would be outside of the scope described herein. This analysis considers evaluation of Sites A and D. As the previous analysis did not include summer conditions, LSC will conduct summer traffic counts similar to the winter traffic counts, as follows:

- PM peak-hour intersection turning-movement counts at 4 study intersections
- 24-hour roadway traffic counts at 3 locations Note that the winter analysis included both holiday and weekday conditions, whereas the summer analysis includes only one busy summer day.
- Summer Traffic Volume Impacts. The trip generation, distribution, and traffic assignment of the proposed project will be estimated based upon the existing traffic counts as well as input from the client regarding existing and proposed summer activities. G Level of Service Analysis Update: Since completion of the original study, the standard methodology for Level of Service (LOS) analysis has been updated. While this is not expected to change the results significantly, the analysis should be updated to avoid critique. In addition, a summer PM peak hour LOS analysis will be provided.

A memorandum will be prepared presenting the traffic analysis and results, with accompanying tables and graphics. Vehicle-Miles of Travel Analysis:

The transportation study scope did not include an analysis of Vehicle-Miles of Travel (VMT). As this will be necessary for the CEQA document, LSC will conduct a spreadsheet-based analysis of VMT, based on the trip generation presented in the transportation study and the distribution of external trips. A memorandum will be

I76-13
cont.

prepared presenting the analysis, results, and potential mitigation measures, as necessary. Summer Parking Analysis.

- Hourly parking counts will be conducted at the existing parking lot on 2 busy days for an 8-hour period each day. The parking demand of the proposed project will be estimated based on the parking count results and any anticipated change in summer activities. A memorandum will be prepared presenting the analysis and results.

- Traffic Safety Analysis: The original transportation study scope also did not include a review of traffic safety impacts. LSC will prepare this analysis, consisting of the following steps: - Review of available crash data for the residential streets impacted by Tahoe XC traffic volumes for the most recent available 10-year period. In addition to reviewing the Statewide Integrated Traffic Records System (SWITRS), we will contact the local CHP and Sheriff's offices as well as the School District to identify if there are any records of crashes not included in the SWITRS database.

- Bicycle and pedestrian counts for a two-hour AM and two-hour PM period of busiest school traffic for the following locations: - Polaris Road just east of the school campus - Polaris Road just west of and east of Old Mill Road - Old Mill Road just south of Polaris Road - Polaris Road just west of Fabian Way - Fabian Way just south of Polaris Road - Fabian Way just north of Polaris Road - An assessment of driver sight conditions along roadways affected by the Tahoe XC traffic volumes. Note that as sight distance restrictions resulting from snow vary widely depending on snowfall and snow removal practices, it is not possible to specifically quantify driver sight distance in peak snow conditions.

- A review of proposed driveway location and spacing. - An evaluation of the overall impact of the proposed project and project alternatives on traffic, bicycle, and pedestrian safety. As necessary, potential mitigation measures will be identified and discussed." Regards, Roger

From: Terri Viehmann

November 14, 2018 7:49 AM

To: 'Huff'; Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt Cc: Sean Barclay; Matt Homolka; Kim Boyd

Subject: RE: OBJECTIONS TO THE PROPOSED TXC CONTRACT AMENDMENT

Hello Roger, Thank you for your comments. Your message will be distributed at this Friday's board meeting, added to the project file, and reviewed by staff and Board. Kind Regards, Terri Viehmann District Clerk Tahoe City Public Utility District

From: Roger Huff (huffmtry@aol.com)

Sent: 11/19/2018 7:28:23 AM Pacific Standard Time

To: jfriedman@tcpud.org, d.wilkins@tcpud.org, r.treabess@tcpud.org, jpang@tcpud.org, scottrzumwalt@gmail.com Cc: sbarclay@tcpud.org, mhomolka@tcpud.org, kboyd@tcpud.org, tviehmann@tcpud.org

Subject: TXC PROJECT CONTRACT QUESTIONS

I76-13
cont.

Dear Board Members, Please answer the following questions regarding the amended professional services agreement (Agreement) for the TXC Ski Lodge Replacement and Expansion Project:

QUESTION #1 – Will there be a TCPUD-owned facility in The Highlands that is routinely available for other community functions like the Highlands Community Center now is, or will it be replaced by one that is designed specifically for TCCSEA members' use and TXC's commercial operations?

QUESTION #2 – Will the Traffic Analysis in the Environmental Impact Report (EIR) include all of the tasks as described in both the basic Agreement's SOW and recent Amendment, or in any way be limited to those in the Amendment? Please do not defer answering the above questions until the Draft EIR review cycle. Your responses will be shared with other concerned members of our community. Thank you, Roger

In a message dated 11/29/2018 11:52:54 AM **tviehmann@tcpud.org** wrote: Hello Roger, Your correspondence has been received by Board and staff. It will be included with the December board packet correspondence and added to the project file. Kind regards, Terri Viehmann District Clerk Tahoe City Public Utility District

From: Roger Huff (huffmtry@aol.com)

November 30, 2018 7:27 AM

To: Terri Viehmann Cc: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay; Matt Homolka; Kim Boyd

Subject: Re: TXC PROJECT CONTRACT QUESTIONS

Thank you Terri. Welcome back. I hope that the Board answers these two contract questions very soon, and will be happy to share their answers with others.

Cheers, Roger

From: Debbie White [debbie@mrooms.co.uk]

December 07, 2018 2:58 PM

To: Kim Boyd; Terri Viehmann; Matt Homolka; Judy Friedman; Dan Wilkins; Sean Barclay

Subject: Fwd: Re: Traffic study, Friday 10th August 2018 on Old Mill, Tahoe City

Kim I never heard back from you on this

Thanks Debbie

From: Kim Boyd

December 07, 2018 4:11:47 PM

To: Debbie - Mountain Rooms & Chalets; Terri Viehmann; Matt Homolka; Judy Friedman; Dan Wilkins; Sean Barclay S

Subject: RE: Re: Traffic study, Friday 10th August 2018 on Old Mill, Tahoe City

Hi Debbie, I apologize for not responding and if my email was not clear. Those types of details, including dates and methodology, will be included in Traffic Study, which will be included in the Draft EIR when published. That is tentatively scheduled for March 2019.

Kim Boyd Senior Management Analyst Tahoe City Public Utility District

I76-13
cont.

From: Roger Huff [huffmtry@aol.com]

December 16, 2018 10:47 AM

To: Judy Friedman; Dan Wilkins; Ron Treabess; John Pang; Scott Zumwalt; Sean Barclay
Cc: Matt Homolka; Kim Boyd; Terri Viehmann

Subject: BOARD MEETING AGENDA ITEM

Good Morning, Will the Board please discuss and answer these two contract questions during Friday's meeting, so that those who are unable to attend it in person are aware of the District's position on them? Thank you, Roger

TXC PROJECT CONTRACT QUESTIONS Dear Board Members, Please answer the following questions regarding the amended professional services agreement (Agreement) for the TXC Ski Lodge Replacement and Expansion Project:

ISSUE #1- The project's latest Title indicates that the facility currently used by the TXC will be "replaced," and the basic Agreement's Scope Of Work (SOW) says the project would "reconstruct" the Highlands Community Center"; but the recent Amendment includes an evaluation for "retaining" and "operation" of the Highlands Community Center." These differences send concerned members of our community confusing, mixed messages. **QUESTION #1** – Will there be a TCPUD-owned facility in The Highlands that is routinely available for other community functions like the Highlands Community Center now is, or will it be replaced by one that is designed specifically for TCCSEA members' use and TXC's commercial operations?

ISSUE #2 - The basic Agreement's SOW calls for a more detailed Traffic Analysis which includes: "Existing traffic, primarily associated with the North Tahoe High School and North Tahoe School, and parking issues in the Highlands community," "Evaluation of Sites A and D, for both winter and summer conditions," "PM peak-hour intersection turning movement counts at 4 study intersections" "24-hour roadway traffic counts at 3 locations," A Level Of Service (LOS) Update, A Vehicle Miles of Travel (VMT) Analysis, A Summer Parking Analysis, and A Traffic Safety Impact Analysis that consists of: "A review of 10-year crash data for all impacted residential streets," "Bicycle and pedestrian counts for busiest AM and PM school traffic periods in the following locations: 1. Polaris Road just east of the school campus 2. Polaris Road just west and east of Old Mill Road 3. Old Mill Road just south of Polaris Road 4. Polaris Road just west of Fabian Way 5. Fabian Way just south of Polaris Road, and 6. Fabian Way just north of Polaris Road," An assessment of driver sight conditions on affected roadways, A review of proposed driveway location and spacing, and "An evaluation of the overall impact on traffic, bicycle, and pedestrian safety." But the recent Amendment only mentions a traffic/parking study that consists of: Confirming the validity of previous winter (intersection turn) counts, Evaluating a potential community center at the existing TXC site, Evaluating impact on circulation and vehicular delays at school access points, Data collection for the potential Cedarwood Access Alternative 5, and "Optional" speed surveys. **QUESTION #2** –Will the Traffic Analysis in the Environmental Impact Report

I76-13
cont.

(EIR) include all of the tasks as described in both the basic Agreement's SOW and recent Amendment, or in any way be limited to those in the Amendment?

Please do not defer answering the above questions until the Draft EIR review cycle. Your responses will be shared with other concerned members of our community. Thank you,

In a message dated 12/17/2018 7:44:02 AM **tviehmann@tcpud.org** wrote: Hello Roger, Thank you for your message. Your previous email is included with the December 21, 2018 board packet. The current message will be distributed to staff, the full board, printed for the public and posted to our website before this Friday's board meeting. Kind regards, Terri Viehmann District Clerk Tahoe City Public Utility

From: Roger Huff [huffmtry@aol.com]

December 17, 2018 7:51 AM

To: Terri Viehmann

Subject: Re: BOARD MEETING AGENDA ITEM

Thank you, Terri. Good job as usual, and hope it gets discussed and answered during the meeting as requested.

Merry Christmas, Roger

From: Alex Lesser

January 14, 2019 10:45:56 AM

To: gscoville@tcpd.org; Kim Boyd; Terri Viehmann; Judy Friedman; John Pang; Scott Zumwalt Cc: Sean Barclay; Matt Homolka; Ramona Cruz

Subject: Follow up

TCPUD Board Members, Your reading file for this Friday's Board meeting shows that community members have sent the TCPUD over seventy emails and letters about the TCCSEA/TXC Ski Lodge project, and those that strongly object to locating the facility next to North Tahoe's schools outnumber those that prefer it by a ratio of ten to one. More than twenty residents have expressed serious concerns about: the ineffectiveness of public outreach processes, lack of credibility and thoroughness in site scoring and traffic studies, and the enormous adverse effects the proposed facility would have upon public safety and environment. When is the TCPUD Board going to start listening?

Very sincerely, Alex

From: Carol Pollock

January 15, 2019 4:45:20 PM

To: Judy Friedman; John Pang; szumwalt@tcpud.org; Gail Scoville; Sean Barclay; Matt Homolka; Ramona Cruz; Kim Boyd; Terri Viehmann; jmcmillon@tcpud.org; dwilkins@tcpud.org

Subject: Agenda Item for Friday's Board meeting

TCPUD Board and Staff, I hope that you will include an Agenda Item for the Board to formally discuss the correspondence between the public and the TCPUD included in the reading file for this week's meeting. It contains a list of letters and emails from members of our community regarding the TXC project that reveals a number of serious concerns about public safety, environmental impacts, economic feasibility, potential conflicts of

I76-13
cont.

interest, and issues with key project documents. If these concerns aren't properly addressed now, they will likely become much more serious problems in the future. I have letters in the file—while I had been very supportive of an improved XC Center--in its current size and location I am not. I am concerned about many issues---principally ones of public safety—traffic, school ingress and particularly egress—and the very real dangers of Old Mill Road. (Which is the route that all GPS systems use to the proposed location) The accidents on Old Mill are generally one car accidents and I doubt if many are reported to the Sheriff or Highway Patrol! I have also asked questions about the budget to build and operate the XC Center. I hope these will be addressed in some detail. I will not be able to attend the meeting but will participate remotely. Thank you for your attention to my request.

Sincerely, Carol Pollock Highlands Homeowner

I76-13
cont.

Letter I76 Carol Pollock

July 24, 2020

Response I76-1

The comment includes background about the letter author and contributions TCPUD has made to the community. The commenter asserts that the proposed Project presents a significant risk to public safety. The comment expresses support for reasonable modifications for the Project at Site A to reduce or eliminate impacts on public safety. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-2

The comment asserts that residents and other users on Polaris Road and Old Mill Road would be affected by increased traffic from the proposed Project. The comment also asserts that pedestrians and bicyclists are already at risk from the existing level of traffic on those streets. The comment expresses the opinion that the current transportation analysis, upon which a variety of conclusions are based, is inaccurate and requests an accurate traffic count of existing traffic on Old Mill Road and Polaris Road. The comment summarizes concerns related to speeding on Polaris Road and icy conditions on Old Mill Road. The comment asserts that the transportation analysis identify realistic ways to minimize traffic safety concerns.

Please see Master Response 1: Transportation Safety. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-3

The comment expresses concern related to alcohol consumption at the proposed Project site. The comment requests analysis of the consequences of alcohol consumption at both the proposed Project site and Alternative A site. The comment asserts the only mitigation would be no alcohol consumption allowed at either site. The comment asks if consumption of alcohol next to a school is legal. See response to comment I10-19, which explains that alcohol would not be sold at the Schilling Lodge. All operations at the Schilling Lodge, including during all events, must obey all laws related to the provision of alcohol. As detailed in response to comment I50-14 above, the portion of the comment related to alcohol consumption addresses social issues rather than specific physical environmental issues and does not address the adequacy of the Draft EIR analysis. Enforcement of laws related to the sale or provision of alcohol is not a topic subject to CEQA review. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-4

The comment requests that the EIR analyze how the additional traffic at Site D would impact safe evacuation or emergency response by fire or law enforcement and how those impacts would be mitigated. The potential for risks related to emergency evacuation are addressed on page 3-12 under Section 3.2.3, "Hazards and Hazardous Materials." See response to comment I10-7, which addresses concerns related to emergency response and evacuation. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-5

The comment requests that proof be provided for the conclusions of the traffic noise consequences for Site D that no mitigation is required. As described on page of 3.8-19 in Section 3.8, "Noise," of the Draft EIR a 10 percent increase in traffic was used to estimate traffic noise increases. This assumption is further explained on page 3.5-13 in Section 3.5, "Transportation," and was used to provide a conservative worst-case scenario. It is unlikely that the proposed Project would result in this level of traffic and associated noise increase; thus, using this conservative assumption to evaluate noise impacts, which were found to not exceed any noise standards, ensures that Project-generated traffic noise increases would be even less than what was reported in the Draft EIR, and therefore, would also not result in a substantial increase in traffic noise that would exceed any applicable standard. Table 3.8-11 on page 3.8-20 in the Draft EIR includes the results of the traffic noise modeling for the proposed Project and Appendix F of the Draft EIR includes all modeling inputs and outputs. The results of the modeling in conjunction with the traffic data supported

by the traffic analysis constitute proof or substantial evidence that support the conclusions. No additional information is needed to supplement the analysis.

Response I76-6

The comment provides suggestions for offsetting the higher elevation advantage of the proposed Project site, such as a shuttle bus from Site A that could provide safe transportation back and forth between the beginner terrain near Site D and the Lodge at Site A. The comment requests evidence that an expanded Lodge at Site D or Site A would offset the impacts of low snow and warmer weather. See response to comment I35-5, which addresses the benefit associated with proximity to user-friendly terrain at the proposed Project site. See response to comment I50-6, which addresses concerns related to the impacts of climate change on the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-7

The comment asserts that the Project represents a massive increase in the size and coverage of the Existing Lodge, which could have significant aesthetic degradation and increased traffic consequences. The comment expresses the belief that the increase in size would not provide a community benefit and requests an explanation of how the Project would not adversely affect aesthetics. See response to comment I10-5, which addresses the comment's concern related to aesthetic impacts. Also see response to comment I10-4, which discusses community uses provided by the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-8

The comment requests an explanation of how the Project would preserve the financial responsibility and transparency of TCPUD's property tax funds and how a facility designed around the applicant's own membership/commercial functions qualifies as being for "community use." The comment asks how will use decisions be made that do not adversely affect public safety of the community. See response to comment I41-8, which addresses concerns related to financial aspects of the Project. See response to comment I10-4, which discusses community uses provided by the Project. A Draft Management Plan prepared by TCCSEA for the Schilling Lodge was included as Appendix B in the Draft EIR. At the time of writing of this Final EIR, the Management Plan has not been finalized and the Management Plan's policies would be included in a future land lease or agreement with TCPUD following construction of the Project. It is possible that additional policies could be included in the Management Plan related to the operation of special events. The comment expressed is not a topic that requires analysis in the EIR under CEQA. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-9

The comment expresses support for a modified Site A alternative that would retain the size of the Schilling residence building, expand the parking lot by 10 spaces, use a shuttle that connects to nearby parking, and provide for paid parking at the Lodge to encourage use of public transit and carpools. The comment requests evaluation of this alternative in the Draft EIR and asserts that the evaluation of the Site A – Modified Project alternative that was rejected in the Draft EIR for the reasons stated are inaccurate. See response to comment A3-6, which addresses requirements for the Project to develop a TDM, which may include measures that encourage use of shuttle buses. Additionally, as detailed in response to comment A2-6, the specific measures and associated details of a TDM plan, such as inclusion of a shuttle bus program, would be analyzed for feasibility and developed by the applicant as part of the development review process; and thus, are not included in the Draft EIR. However, as detailed in response to comment A2-6, in order to provide a more refined and comprehensive set of potentially feasible measures that could be incorporated into the Project TDM plan, a planning level assessment of potentially feasible TDM measures was completed. The TDM measure assessment provides general descriptions of the individual TDM measures, addresses feasibility and applicability of these measures to Project, and provides general ranges of VMT reductions associated with the measures. This assessment is included as Appendix A to this Final EIR.

See response to comment I10-18, which explains the analysis of the various alternatives, including the Site A – Modified Project alternative, that was included in the Draft EIR. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-10

The comment includes an excerpt from Section 4.1.2, “Environmental Impacts of the Tahoe Cross-Country Lodge Replacement and Expansion Project,” and Section 4.2, “ Alternatives Considered and Not Evaluated Further,” from Chapter 4, “Alternatives,” in the Draft EIR. The comment states this is excerpted to include only the two sites currently under consideration with an emphasis on Site A – Reduced Project alternative. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I76-11

The comment excerpted the description of Site A – Reduced Project alternative from the Draft EIR. The comment requests data regarding providing utilities since this would not be necessary on an already developed site. On page 4-3 of the Draft EIR, the description of utilities for Site A – Reduced Project alternative states, “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.” See response to comment I10-18, which explains why additional alternatives were not analyzed in detail. The State CEQA Guidelines Section 15126.6(d) states, “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-12

The comment includes an excerpt of Section 4.3, “Alternatives Selected for Further Evaluation,” including a portion of Table 4-1, “Site Development Features of Each of the Alternatives.” Related to the footnotes in the table, the comment asks why the sizes of the Schilling Lodge and the Existing Lodge are combined. Section 4.5, “Site A – Modified Project,” includes a description of the components of this alternative, which would construct the Schilling Lodge while also continuing to use the Existing Lodge; thus, the square footage of both of those buildings is combined in Table 4-1 (see page 4-10 of the Draft EIR):

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 comment refers to the estimate of trees that would be removed for the Site A – Modified Project alternative and Site D – Reduced Project alternative and asks that the number of trees estimated for removal be provided by an objective source.

As explained under Impact 3.3-2, “Tree Removal,” in Section 3.3, “Biological Resources,” in the Draft EIR (see page 3.3-18):

Removal of trees greater than 14 inches dbh requires review and approval by TRPA. Specifically, applicants must obtain a tree removal permit from TRPA prior to removing trees greater than 14 inches dbh, except for certain cases exempt by the TRPA Code (for example, trees of any size marked as a fire hazard by a fire protection district or fire department that operates under a memorandum of understanding with TRPA can be removed without a separate tree permit). A harvest or tree removal plan is required by TRPA where implementation of a project would cause substantial tree removal. Substantial tree removal is defined in Chapter 61 of the TRPA Code as activities on project areas of 3 acres or more and proposing: (1) removal of more than 100 live trees 14 inches dbh or larger, or (2) tree removal that, as determined by TRPA after a joint inspection with appropriate state or federal forestry staff, does not meet the minimum acceptable stocking standards set forth in Chapter 61.

Because of the number of trees that would be estimated for removal for the Site A – Modified Project alternative and Site D – Reduced Project alternative (see Table 4-1), either of these alternatives would also be required to implement Mitigation Measure 3.3-2: Minimize Tree Removal, Develop and Implement a Tree Removal and Management Plan. The amount of tree removal required for these alternatives would require issuance of a tree review permit by TRPA and, thus, review and approval of any tree survey submitted by the applicant. As stated on page 3.3-10 under Section 3.3.2, “Environmental Setting,” in Section 3.3, “Biological Resources,” of the Draft EIR, “Registered professional foresters have conducted multiple reconnaissance-level tree surveys of the proposed Project and Alternative A sites, which inform the biological effects analysis related to tree removal.” The comment does not provide any specific evidence that the tree survey data provided for the Draft EIR is inaccurate. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I76-13

The comment is an attachment to letter I76 and includes excerpts of correspondence between members of the public, TCPUD staff, and members of the applicant team regarding the Project. The correspondence includes responses to questions raised by members of the public; all of the correspondence occurred prior to release of the Draft EIR; thus, the correspondence does not pertain specifically to the adequacy, accuracy, or completeness of the Draft EIR. Some of the correspondence includes copies of comment letters that were submitted on the Notice of Preparation released for the Project. The topics included in the letter are raised in other comment letters received on the Draft EIR. The categories of topics include:

- ▶ Comparison of fees for use of the Community Center by Tahoe XC compared to other users
- ▶ Tax requirements
- ▶ Presence of a commercial activity at a site not zoned for commercial activity
- ▶ Opposition to the Project
- ▶ Zoning requirements
- ▶ Support for a Site A alternative
- ▶ Traffic safety
- ▶ Discontent with TCCSEA
- ▶ Selection of alternatives
- ▶ Effects of climate change on snow
- ▶ Alcohol concerns
- ▶ Traffic study inadequate
- ▶ Increased traffic and traffic safety
- ▶ Concern about increased size of Lodge
- ▶ Name of the Project
- ▶ Wildfire safety
- ▶ Ascent and LSC scope of work
- ▶ Concerns related to the presentation of the Project at TCPUD Board meetings
- ▶ List of questions from the State CEQA Guidelines Appendix G, “Environmental Checklist Form”
- ▶ Disagreement with terms or statements related to the Project title, Project location, Project description, adaptive reuse
- ▶ Suggestions for alternatives
- ▶ Support for Site D

- ▶ Finances for TCCSEA and the Project
- ▶ Need for the Project
- ▶ Parking
- ▶ Opposition to Site D and Site A
- ▶ Need for a new facility
- ▶ Funding
- ▶ Community use of the Schilling Lodge
- ▶ Opposition to contract amendment for Ascent and LSC

Copies of the comment letters submitted on the NOP were included in Appendix A of the Draft EIR.

See responses to comments I26-1, I32-3, and I41-8. The financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA.

See response to comment I35-6, which addresses concerns related to zoning and allowable uses at either the proposed Project site or Alternative A site. Commercial use at the Existing Lodge or Schilling Lodge is an accessory uses to the primary use on the site.

See response to comment I10-18, which explains the analysis of alternatives included in the Draft EIR and why the inclusion of those alternatives are sufficient to meet the requirements of CEQA to provide a comparative analysis of a reasonable range of alternatives to the proposed Project in the Draft EIR.

See Master Response 1: Transportation Safety, which addresses concerns related to traffic from the Project. See Response I10-15 for a discussion of the traffic study and TPCUD's discretionary role as lead agency for the Project.

See response to comment I50-6, which addresses concerns related to the effects of climate change on the Project.

See responses to comments I10-19 and I64-15, which address concerns related to the presence of alcohol at the Schilling Lodge.

See response to comment I10-8, which addresses concern related to the wildfire analysis in the Draft EIR.

See response to comment I71-5, which addresses the parking analysis in the Draft EIR and the need for the parking lot proposed as part of the Project.

The need for the Project is provided in the "Background and Need" section on pages ES-1 and ES-2 in the "Executive Summary" chapter with Project objectives identified in Section 2.4, "Project Objectives," on pages 2-6 and 2-7 in Chapter 2, "Description of the Proposed Project and Alternatives Analyzed in Detail."

The correspondence includes many opinions related to the Project, including opposition to the proposed Project, opposition to Alternative A, support for the Site D location, and discontent with TCCSEA. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

3.3.3 Public Meeting

**Tahoe Cross Country Lodge Replacement and Expansion Project
Draft Environmental Impact Report
Public Meeting
TCPUD Board of Directors
July 17, 2020, Online Live Stream, Tahoe City, CA**

Letter PM

#	Commenter	Summary of Comments	
		Matt Homolka read aloud two comment letters provided by Roger and Janet Huff and Carol Pollock. To avoid redundancy, these comment letters will be included verbatim with the rest of the comment letters and are not reproduced here.	PM-1
1	Jim Robbins	<p>The commenter states he is a Tahoe XC Board Member.</p> <p>Jim expressed thanks to Sean Barkley, Matt Homolka, and Kim Boyd and the TCPUD staff for their hard work on the project.</p> <p>They are proud of the 20-year partnership and concession agreement with TCPUD.</p> <p>He believes they have established themselves as a vibrant part of the community and thinks Tahoe XC is an important fabric of the outdoor community and believes a new lodge would be beneficial in the long term for everyone.</p> <p>Thanks consultant for preparation of the EIR, which he believes is thorough and accurate.</p> <p>He encourages the Board to approve the project.</p> <p>He understands the mitigating factors could be dealt with.</p> <p>He states the project will help Tahoe XC overcome seasonal difficulties and provide a year-round activity center for the North Tahoe community.</p> <p>He also states the project will allow them to continue to provide good programs and provide access to the backcountry in the neighborhood for youth and adults.</p>	PM-2
2	Don Heapes	<p>Thanks TCPUD staff and Ascent for their high-quality work.</p> <p>He believes this is a rigorous document that helps inform the applicant of the impacts of their project.</p> <p>Asks people who have issues with the document to make an effort to review and understand the document. Facts are the basis for community discussion.</p> <p>Believes the document is comprehensive in scope, rigorous in its process, and correct in its conclusions and the mitigations are appropriate to reducing impacts to less-than-significant levels.</p> <p>One issue that has been brought up is the size of the building. The design of the project has gone through a rigorous process with the design team to design an appropriate sized lodge for their needs. To the existing structure, the project would add 3,000 square feet of basement space to allow for equipment storage and reduce the need for outdoor storage.</p>	PM-3

#	Commenter	Summary of Comments	
		<p>The second level provides space for staff facility and it is within the existing roofline.</p> <p>The small addition to the building is needed to meet the needs for program requirements.</p> <p>When Tahoe XC was presented with the opportunity to save a historic structure they felt compelled to take that opportunity. This is a legacy opportunity for their community and a measure of how we've spent our time here.</p> <p>It is important that this project succeed.</p>	<p>PM-3 cont.</p>
3	Douglas Gorlay	<p>The commenter lives on Polaris Road.</p> <p>He would like to highlight a couple of items in the EIR. Cites the Department of Interior standards for restoration and reconstructing historic buildings, which are included in the EIR. He highlights standards related to relocating or expansion of a historic structure. The commenter states the DOI standards are being violated with this project.</p> <p>His preference is no project.</p> <p>He quotes Section 4.8, which states that the No Project alternative would be the environmentally superior alternative.</p> <p>He states the analysis favors maintaining the Site A alternative over Site D.</p> <p>He states it is hard to imagine that a 76-foot increase in elevation and a slightly flatter starting area is worth increased traffic. He points to differences in the amount of traffic on Polaris versus the traffic at the existing site.</p> <p>He notes there would be an increased danger to students and pedestrians where speeds were recorded at 42 mph and in excess of 50 mph by police reports.</p> <p>He also notes concerns regarding increased ground cover in a pristine meadow and wooded area, increased tree removal on Polaris site, clear violation of zoning and land use covenants on Polaris Road, and sight distance issues per Department of Transportation guidelines that he states will endanger lives of students and pedestrians.</p> <p>He states that a vote for this project is a vote against safety for children, who do not have sidewalks or speed control measures.</p>	<p>PM-4</p> <p>PM-5</p> <p>PM-6</p> <p>PM-7</p> <p>PM-8</p> <p>PM-9</p>
4	William Stelter	<p>Thanks TCPUD for providing the opportunity to comment.</p> <p>He is a TCPUD customer and long-time Tahoe XC passholder. He is also a local civil engineer involved in planning, design, and permitting for nearly 20 years.</p> <p>He describes his experience in reviewing environmental documents (Initial Study/Mitigation Negative Declarations, EIRs, etc.).</p> <p>He stated he has followed this process since the lodge was initially donated by the Schilling family and provided responses to the public questionnaire issued by Tahoe XC 3 years ago.</p> <p>Thanks TCPUD and Tahoe XC for preparing a thorough document that goes above and beyond requirements for analyzing impacts from the project.</p>	<p>PM-10</p>

#	Commenter	Summary of Comments	
		<p>He states his belief that it will be a valuable resource and reference document moving forward.</p> <p>Thank you for being attentive to the detail.</p>	<p>PM-10 cont.</p>
5	Sue Rae Irelan	<p>Introduces herself as a board member of Tahoe XC. The TCCCSEA has partnered with the TCPUD to provide winter and summer recreation at Highlands Park for many years.</p> <p>States one of the things we are seeing in this COVID year is how important it is for our public health to provide public open space and recreation spaces. The use up there, at all of the access points and including the community center, has been increasing over the last few years and that happens whether or not there is a new lodge at whatever size.</p> <p>The use of the trails brings some nuisance factors (traffic, noise, activity, parking).</p> <p>The project as designed and intended to offset a few of the nuisance factors and moving the location at the high school moves nuisance away from more residents.</p> <p>The traffic pattern in the neighborhood will change. The traffic associated with the new lodge is a pretty small amount compared to the amount of traffic that will grow anyway.</p> <p>Part of what we see and part of the reason this entity formed was to provide public recreation and expected to provide this in partnership with the PUD.</p>	<p>PM-11</p>
6	Carol Pollock	<p>We have been part-time residents for 30-40 percent of the year for over 20 years on Old Mill.</p> <p>Asks if any members of the Board live in the Highlands.</p> <p>Also asks if any members of the Tahoe XC board live in the Highlands.</p> <p>See benefits to increasing and improving what exists but also enormous disadvantages of placing the lodge in the neighborhood. A huge disadvantage to anyone who lives in the Highlands.</p> <p>Appreciates all of the work on this project.</p>	<p>PM-12</p>

Letter PM1 TCPUD Board of Directors Meeting

July 17, 2020

Response PM1-1

The comment states that TCPUD staff read aloud comment letters provided by Roger and Janet Huff and Carol Pollock. See comment letter I25, which was submitted by Roger and Janet Huff, and associated responses to the comments. Roger and Janet Huff also submitted comment letter I41. Roger Huff also submitted comment letters I1, I5, I6, I7, I9, I21, I49, and I59. See comment letter I32, which was submitted by Carol Pollock, and associated responses to comments. Carol Pollock also submitted letters I38 and I76. See responses to the comments included in these letters above.

Response PM1-2

The comment provides background about themselves as a Tahoe XC Board member. The comment summarizes the role Tahoe XC has played in the community and asserts his belief that the Project would help Tahoe XC overcome seasonal difficulties and other benefits of the Project. The comment expresses support for the proposed Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-3

The comment provides background about themselves as a Tahoe XC Board member. The comment acknowledges criticisms raised against the Project but hopes that people make an effort to review the document. The comment provides background related to the proposed size of the proposed Lodge. The comment expresses support for the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-4

The comment states that moving the Schilling residence from its original lakefront location is a violation of the Department of the Interior's Standards. Please see response to comment I35-4.

Response PM1-5

The comment refers to Section 4.8, "Environmentally Superior Alternative," on pages 4-20 through 4-22 of the Draft EIR and states that the No Project alternative is the environmentally superior alternative. See response to comment I35-24, which addresses identification of the environmentally superior alternative in the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-6

The comment states the analysis favors maintaining the Site A alternative over the Site D alternative. The comment also questions if the traffic associated with the Project is worth a 76-foot increase in elevation and closer proximity to flatter terrain. See response to comment I10-18, which explains the analysis of alternatives included in the Draft EIR. See response to comment I35-5, which addresses concerns related to the need for a higher elevation and closer proximity to flatter terrain. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-7

The comment notes there would be an increased danger to students and pedestrians where speeds were recorded at 42 mph and in excess of 50 mph by police reports. Please see Master Response 1: Transportation Safety. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-8

The comment lists concerns related to increased coverage in a meadow and wooded area, tree removal, inconsistencies with zoning and land use, sight distance issues, and traffic safety. See response to comment I35-16, which addresses impacts related to increased coverage. See responses to comments I32-4, I35-10, and I41-20, which address concerns related to tree removal. See response to comment I35-6, which addresses the land use and zoning designation on the proposed Project site and Alternative A site. See response to comment A2-5, which addresses requirements for sight distance. See Master Response 1: Transportation Safety, which addresses concern related to

traffic safety, including related to sight distance. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-9

The comment states that a vote for the Project is a vote against safety for children because sidewalks and speed control measures are not present. See Master Response 1: Transportation Safety. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-10

The comment provides background about the speaker as a TCPUD customer, Tahoe XC passholder, local civil engineer, and reviewer of environmental documents. The comment expresses the belief that the document was thorough in analyzing impacts from the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-11

The comment provides background about herself as a Tahoe XC board member. The comment states that accessibility to public open space and recreation spaces is important for public health. The comment acknowledges some nuisance factors associated with use of the trails (e.g., traffic, noise, activity, parking) and notes the Project is designed to offset some of the nuisance factors by moving the location of the Lodge closer to the high school. The comment also notes the traffic pattern in the neighborhood would change with the Project, but it would be relatively small. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response PM1-12

The comment provides background as a part-time resident in the Highlands neighborhood. The comment asks if any of the TPCUD Board members or Tahoe XC Board members live in the Highlands neighborhood. The comment generally states they acknowledge the benefits of the Project but also the disadvantages of the proposed Lodge to the neighborhood. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

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4 REFERENCES

Chapter 1, Introduction

No references are included in this chapter.

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Appendix A

Transportation Demand Management
Preliminary Measure Assessment

TRANSPORTATION DEMAND MANAGEMENT PRELIMINARY MEASURE ASSESSMENT

This Transportation Demand Management (TDM) Preliminary Measure Assessment document was prepared to conduct an initial assessment of available TDM strategies and help inform the future development of a TDM plan for the Proposed project, as required by Placer County Tahoe Basin Area Plan EIR/EIS Mitigation Measure 10-1d and Policy T-P-12 of the Area Plan. The TDM measures included in Table 1 below were primarily adapted from California Air Pollution Control Officers Association's (CAPCOA's) *Quantifying Greenhouse Gas Mitigation Measures* (2010) and Placer County's *Transportation Demand Management Strategies for North Lake Tahoe* (2019).

As detailed in this Final EIR, the applicant would be required to prepare and implement a TDM plan as part of the Placer County development review process to reduce Project-generated daily VMT to the maximum degree feasible. Therefore, it is recommended that a project-specific analysis of the economic, environmental, legal, social, and technological factors of each of the TDM strategies contained within this document be completed by the Project applicant, in coordination with Placer County, during the development review process.

To develop a successful TDM plan, the plan should include a variety of measures that work in conjunction to form a comprehensive strategy and the TDM strategies contained herein should be refined and tailored to the Project to ensure maximum effectiveness. Additionally, all TDM strategies are intended to be flexible so as to be adaptable over time to address gaps and improve effectiveness. The TDM plan would establish a monitoring process to ensure a responsive, effective, and evolving program and the Project applicant would be required to adhere to the monitoring and reporting requirements as determined by Placer County.

The TDM strategies included in this document are evaluated as to whether they are appropriate for potential incorporation into the TDM plan that will be developed with Placer County as part of the design review process. Table 1 below includes general descriptions of the individual TDM measures, provides a preliminary evaluation of feasibility and applicability of these measures to the Project, and shows general ranges of vehicle miles traveled (VMT) reductions typically associated with the measures. However, because the ranges of VMT reductions associated with each individual measure are based on studies typically conducted in urban and suburban areas, these ranges do not necessarily provide an accurate characterization of the possible VMT reductions associated with the Project due to its unique context and nature (i.e., weather patterns, project area topography, land use type, etc.).

Table 1 TDM Measures Assessed for Applicability to the Tahoe Cross-Country Lodge Replacement and Expansion Project

TDM Measure	Description	Feasibility	Typical VMT Reduction Range	Implementation/Applicability to Project
Neighborhood/Site Enhancements				
Provide Pedestrian Network Improvements	Implementation of this measure would entail a pedestrian access network that would connect to all existing or planned external streets and pedestrian facilities contiguous with the Schilling Lodge location. If present, the implementation of this measure could include minimizing barriers (e.g., walls, landscaping, slopes) to pedestrian access and interconnectivity.	Feasible	0% - 2%	Currently implemented as part of the Project. As required by the Placer County Tahoe Basin Area Plan Implementing Regulations (Section 3.06), roadway improvements along the proposed Schilling Lodge parcel frontage at Polaris Road or along the Alternative A site parcel frontage at Country Club Drive would be constructed consistent with the Placer County Design Standards and Guidelines. Improvements would include the construction/reconstruction of a 16-foot paved section from the existing centerline to a Traffic Index of 6.0 plus curb, gutter, and a 6-foot wide sidewalk.
Provide Traffic Calming Measures	Implementation of this measure would entail including pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements and designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips with traffic calming features. Traffic calming features may include: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others.	Potentially Feasible	0.25 – 1.00%	Currently implemented as part of the Project during the development review process. The applicant would participate and partner in a Neighborhood Traffic Management Program (NTMP) for the affected area. As detailed on page 3.5-6 of the Draft EIR and consistent with recommendations within the NTMP, the Project applicant would coordinate with County staff during the development review process regarding program participation and the appropriate traffic calming measures that could potentially be incorporated into the site/development plan. Enhancement of the NTMP (i.e., going above that which is required by the County) could be undertaken as part of this measure. This would consist of including additional traffic calming measures and establishing a point of contact that will disseminate information regarding events that will generate traffic, and serve as a liaison with neighbors to address issues as they arise.
Incorporate Bike Lane Street Design (onsite)	Implementation of this measure would entail incorporating bicycle lanes, routes, and shared-use paths into street systems, new subdivisions, and large developments. These on-street bicycle accommodations would be created to provide a	Potentially Feasible	Varies based on measures grouped with	Not currently implemented as part of the Project. As part of the TDM plan to be refined during the development review process, marked on-street bicycle lanes connecting the Project (proposed Project or Alternative A) to the nearest bicycle facility (i.e., bicycle lane, route, or path) could be

Table 1 TDM Measures Assessed for Applicability to the Tahoe Cross-Country Lodge Replacement and Expansion Project

TDM Measure	Description	Feasibility	Typical VMT Reduction Range	Implementation/Applicability to Project
	continuous network of routes, facilitated with markings and signage. These improvements can help reduce peak-hour vehicle trips by making commuting by bicycle easier and more convenient for more people. In addition, improved bicycle facilities can increase access to and from transit hubs, thereby expanding the "catchment area" of the transit stop or station and increasing ridership.			provided. The bicycle facility nearest to the proposed Project are the bicycle lanes along State Route 28 south of the project site. The bicycle facility nearest to Alternative A is the bicycle path to the north where Country Club Drive terminates. This measure should be finalized and approved by the County during the development review process.
Provide Bike Parking in Non-Residential Projects	Implementation of this measure would entail providing short-term and long-term bicycle parking facilities to meet peak season maximum demand. Providing bike parking in non-residential projects has minimal impacts as a standalone strategy and should be grouped with the other design-based strategies to encourage bicycling by providing strengthened street network characteristics and bicycle facilities.	Potentially Feasible	Varies based on measures grouped with	Partially implemented as part of the Project. As detailed in Table 2-2 in Chapter 2, "Revisions to the Draft EIR," the Project would provide new bike racks to allow for more secure bike parking. However, no long-term bicycle parking spaces are currently included as part of the Project. Therefore, as part of the TDM plan and the development review process and if deemed to be feasible, the applicant would submit plans that identify the location and number of long-term bicycle parking spaces. The final number of long-term bicycle would be determined in coordination with the County. Acceptable parking facilities should be conveniently located near the building entrance and would meet one of the following criteria: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; or 3. Lockable, permanently anchored bicycle lockers.
Provide Electric Vehicle Parking	Implementation of this measure would entail providing accessible electric vehicle parking. The project will provide electric vehicle charging stations and signage prohibiting parking for non-electric vehicles.	Feasible	Unknown	Currently implemented as part of the Mitigation Measure 3.7-1a. As part of Mitigation Measure 3.7-1a detailed in Chapter 2, "Revisions to the Draft EIR," the applicant is required to provide Level 2 electric vehicle charging stations at a minimum of 10 percent of parking spaces for the Project.
Dedicate Land for Bike Trails	Implementation of this measure would entail being required to provide for, contribute to, or dedicate land for the provision of off-site bicycle trails linking the	Infeasible/ Ineffective	N/A	Infeasible/Ineffective. This TDM measure is appropriate for large residential, retail, office, mixed use, and industrial

Table 1 TDM Measures Assessed for Applicability to the Tahoe Cross-Country Lodge Replacement and Expansion Project

TDM Measure	Description	Feasibility	Typical VMT Reduction Range	Implementation/Applicability to Project
	project to designated bicycle commuting routes in accordance with an adopted citywide or countywide bikeway plan.			projects. Therefore, implementation of this TDM measure would not be appropriate due to the scale of the Project.
Parking Policy/Pricing				
Limit Parking Supply	Implementation of this measure would entail changing parking requirements and types of supply within the project site to encourage “smart growth” development and alternative transportation choices by project visitors and employees.	Infeasible/ Ineffective	N/A	Infeasible/Ineffective. This TDM measure is appropriate in the urban and suburban context and for residential, retail, office, mixed use, and industrial projects. Additionally, the measure is only effective if spillover parking is controlled. Therefore, implementation of this TDM measure would not be appropriate due to the surrounding land use context and the type of project (i.e., not urban and does not include retail, office, mixed use, or industrial uses), and because the control of spillover parking has been determined to be an infeasible/ineffective measure as detailed in the "Require Residential Area Parking Permits" discussion below.
Require Residential Area Parking Permits	Implementation of this measure would entail implementing a Residential Parking Permit (RPP) program. A RPP is typically designed to regulate on-street parking adjacent to commercial and recreational attractions by managing the “spillover,” which is likely to occur as a result of a parking management program, particularly if parking in those areas are priced. The RPP would allow people with designated permits to park all day while other drivers have limited access. Residential Parking Permit programs are most appropriate in neighborhoods adjacent to areas that face high parking demand from other uses, such as commercial and recreation areas.	Infeasible/ Ineffective	N/A	Infeasible/Ineffective. This TDM measure is typically appropriate in the urban context and for residential, retail, office, mixed use, and industrial projects. Therefore, implementation of this TDM measure would not be appropriate due to the surrounding land use context and the type of project. Placer County notes in <i>Transportation Demand Management Strategies for North Lake Tahoe</i> (Placer County 2019) that such a program should be developed strategically in residential areas adjacent to State Route 89 in Tahoe City and/or State Route 28 in Kings Beach where regional parking demand is the highest. Therefore, the size and location of the Project and its relatively modest level of parking demand would not justify the implementation of such a program. The effectiveness of this measure is dependent on the ability of Project-generated trips to feasibly shift to other travel modes. In this particular case, the lack of nearby public transit and the primary season of facility use (winter) rendering walking or biking infeasible results in few alternative travel options. Finally, Placer County does not have any existing parking management programs; thus, this measure would require

Table 1 TDM Measures Assessed for Applicability to the Tahoe Cross-Country Lodge Replacement and Expansion Project

TDM Measure	Description	Feasibility	Typical VMT Reduction Range	Implementation/Applicability to Project
				establishing a new program with no existing potential to share staff or costs. Therefore, the implementation of these aforementioned strategies in this specific location would result in monetary costs and neighborhood impacts with little potential to meaningfully reduce automobile use.
Commute Trip Reduction Programs				
Provide Ride-Sharing Programs	Implementation of this measure would entail including a ride-sharing program as well as a permanent transportation management association membership and funding requirement. Funding may be provided by a Community Facilities, District, or County Service Area, or other non-revocable funding mechanism.	Potentially Feasible	1 – 15%	<p>Not currently implemented as part of the Project. The Project applicant would promote ride-sharing programs through a multi-faceted approach such as:</p> <ul style="list-style-type: none"> ▶ Designating a certain percentage of parking spaces for ride sharing vehicles ▶ Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles ▶ Providing a web site or message board for coordinating rides <p>The program must be finalized and approved by the County as part of the TDM plan during the development review process.</p>
Implement Subsidized or Discounted Transit Program	Implementation of this measure would entail providing subsidized/discounted daily or monthly public transit passes to employees. The project could also provide free transfers between all shuttles and transit to participants. These passes could be partially or wholly subsidized by the employer, school, or development.	Infeasible/ Ineffective	N/A	<p>Infeasible/Ineffective. This TDM measure is appropriate in the urban and suburban context and for residential, retail, office, mixed use, and industrial projects. Therefore, implementation of this TDM measure would not be appropriate due to the surrounding land use context and the type of project. Additionally, the distance from the proposed Project and Alternative A to the nearest transit stop (0.8 miles and 0.6 miles, respectively) combined with the topography of project area and the inclement winter weather in the region would discourage the use of transit to access the Project.</p>
Provide End of Trip Facilities	Implementation of this measure would entail providing "end-of-trip" facilities for bicycle riders including showers, secure bicycle lockers, and changing spaces. End-of-trip facilities encourage the use of bicycling as a viable form of travel to destinations, especially to	Potentially Feasible	Varies based on measures grouped with	<p>Partially implemented as part of the Project. As detailed in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," of the EIR, the Schilling Lodge would have space dedicated for public lockers and public showers. Therefore, consistent with the "Provide Bike</p>

Table 1 TDM Measures Assessed for Applicability to the Tahoe Cross-Country Lodge Replacement and Expansion Project

TDM Measure	Description	Feasibility	Typical VMT Reduction Range	Implementation/Applicability to Project
	work. End-of-trip facilities provide the added convenience and security needed to encourage bicycle commuting.			Parking in Non-Residential Projects" measure detailed above, the Project applicant would provide bike lockers on site if determined to be feasible.
Implement Commute Trip Reduction Marketing	This measure would entail implementing marketing strategies to reduce commute trips through information sharing and marketing strategy.	Potentially Feasible	0.8 – 4.0%	<p>Not currently implemented as part of the Project. The Project applicant, in coordination with the County, would develop a commute trip reduction marketing program designed to reduce VMT. Marketing strategies may include:</p> <ul style="list-style-type: none"> ▶ New employee orientation of trip reduction and alternative mode options ▶ Event promotions ▶ Publications (e.g., newsletter, fliers)
Implement Preferential Parking Permit Program	Implementation of this measure would entail providing preferential parking in convenient locations (such as near building front doors) in terms of free or reduced parking fees, priority parking, or reserved parking for commuters who carpool, vanpool, ride-share or use alternatively fueled vehicles. The project would provide wide parking spaces to accommodate vanpool vehicles.	Potentially Feasible	Unknown	<p>Partially implemented as part of the Project. As part of Mitigation Measure 3.7-1a in Chapter 2, "Revisions to the Draft EIR," of the Final EIR, the applicant is required to dedicate onsite parking for shared vehicles. As part of the TDM plan and the development review process, the applicant would submit plans that locate and identify designated preferential parking spaces for carpool, vanpool, ride-share, or use alternatively fueled vehicles in convenient locations.</p>
Implement Car-Sharing Program	This measure would entail implementing a car-sharing project to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis. User costs are typically determined through mileage or hourly rates, with deposits and/or annual membership fees. The car-sharing program could be created through a local partnership or through one of many existing car-share companies.	Infeasible/ Ineffective	N/A	<p>Infeasible/Ineffective. This TDM measure is appropriate in the urban and suburban context and for residential, retail, office, mixed use, and industrial projects. Additionally, there are no existing car-share companies operating in the region surrounding the proposed Project or Alternative A sites. Therefore, implementation of this TDM measure would not be appropriate due to the surrounding land use context and the lack of car-share companies operating in the region, and the limited number of onsite employees.</p>
Provide Employer-Sponsored Vanpool/Shuttle	This measure would entail implementing an employer-sponsored vanpool and/or shuttle. A vanpool would usually service employees' commute to work while a shuttle would service nearby transit stations and	Potentially Feasible	0.3 – 13.4%	<p>Not currently implemented as part of the Project. The Project applicant, in coordination with the County, would develop and implement an employer-sponsored vanpool to service employee commutes to work. The vanpool program</p>

Table 1 TDM Measures Assessed for Applicability to the Tahoe Cross-Country Lodge Replacement and Expansion Project

TDM Measure	Description	Feasibility	Typical VMT Reduction Range	Implementation/Applicability to Project
	surrounding commercial centers. Employer-sponsored vanpool programs entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at least program administration, if not more. The driver usually receives personal use of the van, often for a mileage fee. Scheduling is within the employer's purview, and rider charges are normally set on the basis of vehicle and operating cost.			would provide service between the Schilling Lodge and general locations where employees live. The Project applicant would purchase or lease vans for employee use and pay for mileage and maintenance of the vehicles. The Project applicant would study the feasibility of implementing a shuttle plan and service designed to serve Project visitors. If determined that the demand for such a service exists, the Project applicant, in coordination with the County, would develop a shuttle service plan and subsequently implement the shuttle service. To avoid high operating costs, service could be designed to operate in peak seasons and/or as a circulator with limited stops and service areas.
Price Workplace Parking	This measure would entail implementing workplace parking pricing. This may include: explicitly charging for parking for its employees, implementing above market rate pricing, validating parking only for invited guests, not providing employee parking and transportation allowances, and educating employees about available alternatives.	Infeasible/ Ineffective	N/A	Infeasible/Ineffective. This TDM measure is appropriate in the urban and suburban context and for retail, office, mixed use, and industrial projects. Additionally, the measure is only effective if spillover parking is controlled. Therefore, implementation of this TDM measure would not be appropriate due to the surrounding land use context and the type of project (i.e., not urban and does not include retail, office, mixed use, or industrial uses), and because the control of spillover parking has been determined to be an infeasible/ineffective measure as detailed in the "Require Residential Area Parking Permits" discussion above.
Implement Employee Parking "Cash-Out"	Implementing this measure would entail employers offering employee parking "cash-out." The term "cash-out" is used to describe the employer providing employees with a choice of forgoing their current subsidized/free parking for a cash payment equivalent to the cost of the parking space to the employer.	Potentially Feasible	0.6 – 7.7%	Not currently implemented as part of the Project. The Project applicant would offer employees the choice to receive a cash payment equivalent to the cost of the parking space to the employer. The applicant would provide County staff with a signed letter agreeing to implement this measure as part of the TDM plan including provisions for the Parking Cash-Out Program, via new employee packets, tenant lease documents, and/or deeds. This information would be submitted during the development review stage.

Note: N/A = not applicable

Source: Adapted by Ascent Environment in 2021 from Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010) and Transportation Demand Management Strategies for North Lake Tahoe (Placer County 2019)

REFERENCES

California Air Pollution Control Officers Association. 2010 (August). *Quantifying Greenhouse Gas Mitigation Measures*.
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