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 Koijane	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 increases 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/f?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.

COUNTY OF Placer

Letter A2

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

Planning Division ▪ 3091 County Center Drive, #190 ▪ Auburn, CA 95603
(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 Measure*s 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;
- Commute 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 (PM_{10}). The potential short-term construction-generated emissions of ROG, NO_X, and PM_{10} 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 PM_{10} 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	~~2 racks~~ Minimum of 15 short-term bicycle parking spaces	~~2 racks~~ Minimum of 10 short-term bicycle parking spaces
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 Measure*s document. The documented VMT reduction percentages contained within *Quantifying Greenhouse Gas Mitigation Measure*s (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 peaks 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 3.5-6~~b~~: 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<u>s</u> 3.7-1a <u>and 3.7-1b</u> 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 <u>as detailed therein</u>. 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~~.

<u>Significance after Mitigation</u>

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

Letter A3

Placer County
AIR POLLUTION CONTROL DISTRICT

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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? A3-4

2. Will the proposed project also include student practices, student winter races and student non-winter events? 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] (~~10~~ 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/m^3 = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million

1 California standards for ozone, carbon monoxide, SO_2 (1- and 24-hour), NO_2, 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 PM_{10} 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 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/m^3). 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 (PM_{10}) 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 County[1]

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)

Table 3.6-3 Attainment Status Designations for Placer County[1]

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 PM_{10}, 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 CRF 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 CRF 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. <u>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.</u> 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.

<u>Response A3-13</u>

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 (PM_{10}) 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 $PM_{~~10~~2.5}$ 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.

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 $PM_{~~10~~2.5}$ 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.

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~~ 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 ~~p~~Project vicinity now. ~~I~~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

KEEP TAHOE BLUE
League to Save Lake Tahoe

advocate | eng eate

Letter O1

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 TRPA[2] 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?**

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 O1-3

[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.

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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 or 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 law[6] 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 project[9] 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/2_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 measure 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.