

3.3.3 Individuals

Letter
I1

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

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

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

I1-1

Have a nice weekend,
 Roger

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

Dear Interested Party,

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

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

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

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

Tahoe City Public Utility District

Kim Boyd, Senior Management Analyst

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

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

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

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

Thank you,

Kim Boyd

Senior Management Analyst

Tahoe City Public Utility District

530.580.6286 Direct

530.583.3796 Main Office ext. 386

www.tcpud.org

Letter I1 Roger Huff

June 5, 2020

Response I1-1

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

Letter 12

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

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

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

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

Thanks again.

Sent from my phone; pls xcus brevity & typos!

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

Hi Marguerite,

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

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

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

Please let me know if you continue to have trouble.

Thanks,
Kim

Tahoe City - Public Utility District

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

I2-1

www.tcpud.org

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

Hi again Kim:

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

regards,
Marguerite Sprague

I2-1
cont.

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

Dear Interested Party,

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

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

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Tahoe City Public Utility District

Kim Boyd, Senior Management Analyst

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

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

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

Thank you,

Kim Boyd

Senior Management Analyst

Tahoe City Public Utility District

530.580.6286 Direct

530.583.3796 Main Office ext. 386

www.tcpud.org

<image003.jpg>

Letter I2

Marguerite Sprague

June 8, 2020

Response I2-1

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

**Letter
I3**

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

Kim,

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

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

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

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

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

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

I3-1

Letter I3 Joe Hennessey
June 8, 2020

Response I3-1

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

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

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

Letter
I4

Kim

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

I4-1

Thank you

Alex
www.pssclabs.com

Letter I4 Alex Lesser June 9, 2020

Response I4-1

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

Letter I5

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

Dear Board Members,

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

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

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

Very sincerely,

Roger Huff

I5-1

Letter I5 Roger Huff

June 10, 2020

Response I5-1

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

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

**Letter
I6**

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

- (1) Can the TCPUD spaces accommodate all interested parties with the required social distancing for a July 17th Public Meeting?
- (2) Can members of the public bring Powerpoint slides on thumb drives to augment their Oral comments during the meeting?

I6-1

Thanks and have a nice day,
 Roger

Letter I6 Roger Huff
 June 11, 2020

Response I6-1

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

Letter
17

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

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

I7-1

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

The screenshot shows an email header for Tahoe City Public Utility District. The main content is a "Notice of Meeting: TCPUD Board of Directors" scheduled for Friday, June 19, 2020, at 8:00am. The notice states that due to Executive Order N-29-20, the meeting room will not be accessible to the public. It also mentions that the meeting is accessible via live streaming and public comment will be accepted via email and text message. Contact information for Terri Viehmann, District Clerk, is provided, along with links to the agenda on the website and DropBox.

Letter I7 Roger Huff

June 12, 2020

Response I7-1

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

**Letter
I8**

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

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

Sent from my iPhone

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

Dear Board Members,

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

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

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

Very sincerely,

Roger Huff

I8-1

Letter I8 Bonnie Dodge
June 13, 2020

Response I8-1

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

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


**Letter
I9**

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

I9-1

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

Tahoe City
Public Utility District



Notice of Special Meeting: TCPUD Board of Directors

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

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

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

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

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

Letter I9 Roger Huff
 June 15, 2020

Response I9-1

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

Letter
I10

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

Hi Kim

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

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

I10-1

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

I10-2

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

I10-3

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

I10-4

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

I10-5

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

I10-6

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

I10-7

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

I10-8

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

I10-9

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

I10-10

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

I10-11

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

I10-12

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

I10-13

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

I10-14

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

I10-15

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

I10-16

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

I10-17

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

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

I10-18

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

I10-19

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

I10-20

Letter I10 Alex Lesser

June 23, 2020

Response I10-1

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

Response I10-2

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

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

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

Response I10-3

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

Response I10-4

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

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

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

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

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

Response I10-5

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

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

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

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

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

Response I10-6

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

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

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

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

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

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

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

Response I10-7

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

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

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

Response I10-8

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

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

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

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

Response I10-9

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

Response I10-10

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

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

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

Response I10-11

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

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

Response I10-12

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

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

Response I10-13

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

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

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

Response I10-14

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

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

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

Response I10-15

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

Response I10-16

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

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

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

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

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

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

Response I10-17

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

Response I10-18

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

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

Although this alternative may reduce some environmental effects of the proposed Project (e.g., incrementally smaller increase in traffic), it was rejected from further evaluation because it would not have sufficient space to meet the needs of existing and future operational needs of the Project applicant (e.g., open interior space for a gear rental area) and would not substantially reduce any adverse environmental effects, as compared to the proposed Project. Additionally, due to the distance from the school, the location of this alternative would be less ideal than the proposed Project site for a shared parking agreement with the school for parking during special events.

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

The Site D – Reduced Project alternative would include a 6,229-sq. ft. building. Because of the reduced number of parking spaces (65 total parking spaces), this alternative was found to result in the potential for parking to spillover onto adjacent residential roadways or the adjacent high school and middle school on peak days would be incrementally greater than with the proposed Project (see page 4-17).

As further discussed on page 4-22:

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

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

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

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

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "... a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation.

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

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

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

Response I10-19

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

Response I10-20

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

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

Letter
I11

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

TCPUD,

We are Homeowners on Polaris Road.

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

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

I11-1

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

I11-2

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

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

Sent from my iPad

Letter I11 Roland and Cheryl Stewart

June 23, 2020

Response I11-1

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

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

Response I11-2

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

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

The potential transportation impacts of the proposed Project and Alternative A are analyzed under "Environmental Effects of the Project," beginning on page 3.5-19 in Section 3.5, "Transportation," in the Draft EIR. A comparison of the transportation impacts of the proposed Project and Alternative A is provided in Section 4.8.3, "Transportation Impacts," on page 4-21 of Chapter 4, "Alternatives," in the Draft EIR. Here the analysis acknowledges that the proposed Project would alter the pattern of vehicle traffic in the Highlands neighborhood and could add traffic on Polaris Road at times when vehicles are also traveling to and from North Tahoe High School and North Tahoe Middle School; however, as discussed in Impacts 3.5-1 and 3.5-2 in Section 3.5, "Transportation," neither implementation of the proposed Project nor Alternative would degrade intersection or roadway operations to unacceptable levels or exceed Placer County's threshold for 2,500 vehicles per day on a residential street. Additionally, the analysis concludes that although the increase in unmitigated VMT would be greater under the proposed Project and Site D – Reduced Project alternative than with Alternative A and the Site A – Modified Project alternative, the proposed Project and all alternatives would be required to mitigate the net increase in VMT over the existing amount of VMT so that there are no unmitigated VMT. Thus, there is no difference in the level of significance in the impact between the proposed Project and Alternative A related to traffic.

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

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

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

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

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

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

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

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

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

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

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

Letter I12

TCPUD Board Members,

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

Thank you,
 William Sharbrough
 Sent from my iPhone

I12-1

Letter I12 William Sharbrough
 June 23, 2020

Response I12-1

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

**Letter
I13**

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

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

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

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

Thank you,
Sharon Buss

Sent from my iPhone

I13-1

Letter I13 Sharon Buss
June 26, 2020

Response I13-1

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

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

**Letter
I14**

Dear Kim:

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

I agree with and support the conclusions.

Thanks Rick Ganong
June 27,2020

I14-1

Letter I14 Rick Ganong
June 27, 2020

Response I14-1

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

**Letter
I15**

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

Hi Kim,

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

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

I15-1

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

Debbie Kelly-Hogan
PO Box 580
Tahoma, CA 96142

Letter I15 Debbie Kelly-Hogan
June 29, 2020

Response I15-1

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

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

Letter
I16

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

I16-1

David Schwisow
 3015 Polaris Road

Letter I16 David Schwisow

July 2, 2020

Response I16-1

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

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

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

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

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

**Letter
I17**

Dear Mr. Boyd.

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

I17-1

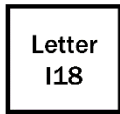
Regards,

Peter Werbel

Letter I17 Peter Werbel
 July 3, 2020

Response I17-1

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



July 4th, 2020

Board of Directors

Tahoe City Public Utility District

Re: Tahoe Cross Country Lodge Replacement and Expansion Project

To Whom It May Concern:

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

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

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

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

Sincerely,

Patti and Michael Dowden

Verdi, NV (formerly Tahoe City 1973-2019)

I18-1

Letter I18 Patti and Michael Dowden

July 4, 2020

Response I18-1

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

**Letter
I19**

July 5, 2020

Dear TCPUD Directors,

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

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

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

Sincerely,
Jan Ganong

I19-1

Letter I19 Jan Ganong
July 5, 2020

Response I19-1

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

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

**Letter
I20**

July 7, 2020

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

Dear Ms. Boyd;

RE: SCHILLING LODGE DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS

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

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

I20-1

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

I20-2

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

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


I20-2
cont.

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

Very truly yours,



Vicki Kahn



Roger Kahn

Letter I20 Vicki and Roger Kahn

July 7, 2020

Response I20-1

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

Response I20-2

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

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

Letter I21

Good Morning,

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

I21-1

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

I21-2

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

I21-3

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

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

I21-4

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

Please Help,

Roger

Letter I21 Roger Huff

July 8, 2020

Response I21-1

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

Response I21-2

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

Response I21-3

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

Response I21-4

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

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

Letter I22

Dear Kim

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

I22-1

Tom O'Neill

Contact:

E-Mail tfxon@sbcglobal.net

Tel (530) 583-2245

Letter I22 Tom O'Neill

July 9, 2020

Response I22-1

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

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

**Letter
I23**

Hi,

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

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

I23-1

Thanks for your time,

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

Letter I23 Travis Ganong
 July 9, 2020

Response I23-1

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

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

Letter I24

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

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

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

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

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

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

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

I24-1

Letter I24 Mark Boitano

July 10, 2020

Response I24-1

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

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

Letter I25

Dear Board Members,

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

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

I25-1

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

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

I25-2

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

I25-3

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

I25-4

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

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

I25-5

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

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

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

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

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

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

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

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

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

I25-14

Very sincerely,
 Roger and Janet Huff

Letter I25 Roger and Janet Huff

July 12, 2020

Response I25-1

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

Response I25-2

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

Response I25-3

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

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

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

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

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

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

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

Response I25-4

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

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

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

Response I25-5

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

Response I25-6

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

Response I25-7

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

The use and storage of hazardous materials does occur at the schools adjacent to the proposed Project site. Although the building formerly used as a "bus barn" is not currently used to store buses, the building does store a 30-gallon diesel tank and other hazardous materials are stored at the schools or in the bus barn, such as cleaners, fuel, and fertilizer (Rivera, pers. comm., 2020). Additionally, chemicals are stored onsite for use in science labs. Again,

although Appendix G of the State CEQA Guidelines asks whether a project would emit or handle hazardous or acutely hazardous materials near a school, schools themselves may use, store, and/or handle hazardous materials, like that which currently occurs at the North Tahoe High School and North Tahoe Middle School.

The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I25-8

The comment disagrees that allowing up to 100 more vehicles per day onto the only emergency response and evacuation route for the schools would be a less-than-significant impact. The comment is inaccurate in its characterization of the number of new Project-generated trips. Please see page 3.5-13 through 3.5-17 of the Draft EIR for a detailed description of the trip generation. See response to comment I10-7, which addresses concerns related to additional vehicle traffic from the Project and potential impacts related to emergency response and evacuation. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-9

The comment asserts that the assumptions made in Section 3.2.9, "Wildfire," in the Draft EIR that the proposed facility would not attract more visitors, most visitors would be local, and the increased number of activities and large events are too subjective to be used to evaluate increased wildfire risks. The comment's statement that the Draft EIR states the proposed facility would not attract more visitors is incorrect (see response to comment I10-8). Also see response to comment I10-8, which discusses other rationale used to support the Draft EIR's conclusion that the proposed Project would not exacerbate wildfire risks. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-10

The comment is related to the potential for the proposed Project to qualify as "Rehabilitation" under the Secretary of the Interior's Standards. See response to comment I10-10, which describes the guidance for "Rehabilitation" under the Secretary of Interior's Guidelines. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-11

The comment expresses concern that the Draft EIR does not address requests by multiple residents that the safety risks associated with increased traffic would have upon pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris Road between the schools and Heather Lane be analyzed. The comment also asserts the trip generation assumptions used as the basis of the public safety, air quality, and noise analyses in the Draft EIR are too subjective.

See response to comment O1-3, which addresses concerns about the approach used to develop the trip generation assumptions used in the Draft EIR.

See Master Response 1: Transportation Safety, which addresses concerns related to traffic safety associated with the Project.

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-12

The comment asserts that it is not acceptable to have lane/street closures, redirection of traffic, or staging of heavy vehicles on residential streets as referred to in Impact 3.5-5 of the Draft EIR. See response to comment I10-12, which addresses concerns regarding construction-related traffic impacts. The comment's assumption that heavy vehicles would be staged on residential streets is inaccurate.

Response I25-13

The comment asserts that the claim in Section 3.1.1 of the Draft EIR that no mitigation measures would be required is incorrect because TRPA Policy and NTFPD Code prohibits development if there is not adequate water for domestic use and fire protection and in light of a recent wildfire in the neighborhood. See response to comment I10-16, which addresses concerns related to water supply and regarding the wildfire mentioned in the comment. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I25-14

The comment notes the desire to put the Project onto a less controversial course that preserves the historic building and benefits a larger segment of the community, as specified and desired by the Schilling family members. See comment letter I75 from a member of the Schilling family that expresses support for the Project. See responses to comments I10-10, I35-4, I41-23, and PM1-4, which provide rationale to support the conclusions in the Draft EIR that there would be no significant impact to the historical significance of or alter the historic character of the Schilling residence. See responses to comments I10-2 and I10-4 that provide rationale that the Project would serve community uses. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.