

From: [Ted Gomoll](#)
To: [Kim Boyd](#)
Subject: T C Cross Country Project
Date: Monday, July 13, 2020 10:01:21 AM

Letter I26

Kim,

I plan on attending the meeting this Friday (virtual). Could you send instructions. I have one question and two comments. The question is how will the project be paid-hopefully not a PUD assessment on Tahoe City homeowners. The comments are: Please have all construction traffic access via Village, not Old Mill. Second, can construction take place on weekdays only, no weekend work.

I26-1
I26-2

Regards,
Ted Gomoll

Sent from [Mail](#) for Windows 10

Letter I26 Ted Gomoll

July 13, 2020

Response I26-1

The comment asks TCPUD how the Project would be paid for and notes that hopefully it would not be funded by a TCPUD assessment on Tahoe City homeowners. How the Project is funded is not a topic that requires analysis in the EIR under CEQA; thus, no further response is required. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I26-2

The comment requests that construction traffic access the Project site via Village Road instead of Old Mill Road and requests that there would be no construction on weekends. Construction vehicles would likely use the most logical access point to the site, either by Village Road or Old Mill Road, and the comment does not identify any specific issues that relate to this topic and the adequacy of the Draft EIR. As discussed under Section 2.5.3, "Construction Schedule and Activities," on page 2-22 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," construction activities would occur during daytime hours exempt from noise standards by TRPA, which allows for weekend work. At this time it cannot be guaranteed that construction activities would not occur on the weekend; however, this could be a condition of Placer County's building permit. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Julie Maurer](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Monday, July 13, 2020 5:55:02 PM

Letter
I27

I believe the scope of the review is complete and adequate for the project and serves the public interest well. Conclusions in the EIR are well founded and any potentially significant impacts can be mitigated.

I am in support of the adequacy of the EIR and of the project moving forward. Thank you.

Julie Maurer

I27-1

Letter I27 Julie Maurer
July 13, 2020

Response I27-1

The comment expresses support for the analysis in the Draft EIR and for the proposed Project. The comment expresses the belief that the significant impacts could be mitigated. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Kim Boyd, Senior Management Analyst
Tahoe City Public Utility District
Sent via email: kboyd@tcpud.org

**Letter
I28**

Subject: Tahoe XC Draft EIR

Dear Kim,

I would like to offer this letter of support for the Tahoe Cross Country Ski Education Association Tahoe Cross Country Lodge Replacement and Expansion Project as proposed (Site D). I have reviewed the EIR and believe that the EIR is adequate. While there are some impacts that are listed as 'significant', it appears that those impacts can be mitigated.

I would also like to commend the Tahoe City PUD for taking the lead in this project. As a resident of Tahoma, CA., in the TCPUD service area, Tahoe City is our 'hometown'. As such, and as a 35-year resident, it has been interesting to observe how the town has been in decline for some number of years. It can be argued that the decline is partly in response to the buildup of both Truckee and Squaw Valley. Still, Tahoe City has an incredibly unique 'signature' as a small mountain town with plenty of character, both realized and potential. I strongly believe that this Lodge, which repurposes an historic building, will add a great deal to that character. It will also restore a beautiful and significant architectural gem in the Shilling Lodge. It seems obvious that this lodge replacement project can and should be a piece in a larger plan to help Tahoe City and the surrounding area realize its great and unique potential as an outdoor recreation area where we, as residents, and guests from out of town, can come and experience what the natural world has to offer.

I realize also that some residents of the area may be impacted by this lodge. However, many individuals will also have the current impact of the existing lodge reduced as focus shifts elsewhere. In the end, I hope that all realize what a benefit this lodge will be to our community as a whole and especially to the young people of our community who find such wholesome outdoor recreation at the Tahoe Cross Country Center. The new location can only make a good operation world class and something we can all be proud of.

Thank you for your consideration,



Michael Hogan

I28-1

Letter I28 Michael Hogan

July 14, 2020

Response I28-1

The comment includes background information about the letter's author and expresses support for the analysis in the Draft EIR and for the proposed Project. The comment expresses the belief that the impacts found to be significant could be adequately mitigated. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Cindy Owens](#)
To: [Kim Boyd](#)
Cc: ["Bob Owens"](#)
Subject: Tahoe Cross-Country Draft EIR
Date: Tuesday, July 14, 2020 9:02:00 AM

Letter I29

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

As homeowners in the Highlands neighborhood, we support the Tahoe Cross-Country Lodge Replacement and Expansion Project and have reviewed the Draft Environmental Impact Report found on the TCPUD website. We believe the report adequately documents the project's impact to the region.

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I29-1
|

The finished project will be a great addition to the region.

Thank you,
Robert and Cindy Owens
3075 Watson
Tahoe City, CA 96145-7916

Letter I29 Robert and Cindy Owens

July 14, 2020

Response I29-1

The comment includes background information about the letter's author and expresses support for the analysis in the Draft EIR and for the Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Thomas, Randolph](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Tuesday, July 14, 2020 3:19:10 PM

Letter I30

Dear Ms. Boyd and TCPUD Board Members:

I have been visiting the Tahoe Basin for over 50 years for summer and winter activities, and my wife and I are now fulltime residents of Tahoe Pines. The Historic Schilling Lodge Project very much reflects my vision of Lake Tahoe and the celebration of heritage and pursuit of excellence. The historic homes, like Schilling, Vikingsholm, Hellman-Ehrman Estate, Pope Estate, and others offer a glimpse into the past and suggest a standard of who we still want to be with regard to tradition and values. Outdoor activities are a popular reason people come to the Lake Tahoe area, and ever since the first native American visitors and much later the hosting of the 1960 Olympics, this area has offered people of all ages a sense of potential for personal achievement and well-being. The Schilling Lodge would serve as an attractive, powerful gateway to the outdoors and these ideals.

The Historic Schilling Lodge Project represents the best of Tahoe tradition, and I believe, inspires the best in us, young and old, visitors and residents alike. The possibility to locate this facility in proximity to the North Tahoe High School and Middle School should help attract many students towards healthy and active activities, as opposed to sedentary lifestyle all too popular among many in today's world. In summary, this is a very unique opportunity to provide the community with an important year-round facility that reflects our values and will enhance our region for generations to come.

Sincerely,
 Randy & Barbara Thomas

R. W. Thomas
 4140 Interlaken Road, Tahoe Pines
 (530) 807-7566

I30-1

Letter I30 Randy and Barbara Thomas

July 14, 2020

Response I30-1

The comment includes background information about the letter's author, summarizes benefits of the proposed Project, and expresses support for the proposed Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Dave Wilderotter](#)
To: [Kim Boyd](#)
Subject: Tahoe XC Draft EIR
Date: Tuesday, July 14, 2020 1:54:36 PM

**Letter
I31**

To whom it may concern:

I've read the draft EIR and have concluded to my satisfaction that it was done appropriately. It has answered my questions and concerns. Possible mitigation measures have been addressed. All in all a thorough and professional report.

I31-1

Dave Wilderotter
Tahoe Dave's

Sent from my Verizon, Samsung Galaxy smartphone

Letter I31 Dave Wilderotter
July 14, 2020

Response I31-1

The comment expresses support for the completeness and analysis in the Draft EIR. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Kim Boyd](#)
To: [Kim Boyd](#)
Subject: FW: Questions and comments regarding proposed TXC project DEIR
Date: Wednesday, July 15, 2020 11:32:44 AM
Attachments: [Untitled attachment 02037.txt](#)
[Untitled attachment 02040.txt](#)
[Untitled attachment 02043.txt](#)
[Untitled attachment 02046.txt](#)
[Untitled attachment 02049.txt](#)

Letter
I32

Kim Boyd
 Senior Management Analyst
 Tahoe City Public Utility District
 530.580.6286 Direct
 530.583.3796 Main Office ext. 386
www.tcpud.org

-----Original Message-----

From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 Sent: Tuesday, July 14, 2020 10:33 PM
 To: Terri Viehmann <tviehmann@tcpud.org>; Dan Wilkins <d.wilkins@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; John Pang <jpang@tcpud.org>; scottzumwalt@gmail.com; Gail Scoville <gscoville@tcpud.org>
 Cc: Sean Barclay <sbarclay@tcpud.org>; kboyd@tcpud.com; Matt Homolka <mhomolka@tcpud.org>
 Subject: Questions and comments regarding proposed TXC project DEIR

Dear Board Members,

I would appreciate it if the following questions and comments are read aloud and discussed during the upcoming Board meeting. I I32-1

1. Does the DEIR consider the dangerous winter traffic conditions on Old Mill Road? We have provided comments and photos of winter accidents to the Board in January. Some photos are included again. Does the Board consider increasing winter traffic on Old Mill in the interests of public safety? Of either residents or visitors to the TXC? How can Appendix D conclude that the proposed site D wouldn't result in a significant traffic safety impact? I I32-2

2. Is there a construction budget and operating budget for this project? What are the financial consequences of low snow years for TXC? What are the consequences of significant operating deficits? I I32-3

3. What regulatory approvals are required for the construction and coverage of a large building and significant paving of meadow and forest and tree removal? Have they been sought? I I32-4

Thank you,

Carol Pollock
 405 Old Mill Road

From: [Matt Homolka](#)
To: [Kim Boyd](#)
Subject: FW: Questions and comments regarding proposed TXC project DEIR
Date: Friday, July 17, 2020 11:23:27 AM

Matt Homolka, P.E.
 Assistant General Manager/District Engineer
 Tahoe City Public Utility District
 530.580.6042 Direct
 530.583.3796 Main Office ext. 342
 www.tcpud.org

-----Original Message-----

From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 Sent: Friday, July 17, 2020 9:10 AM
 To: Matt Homolka <mhomolka@tcpud.org>
 Subject: Re: Questions and comments regarding proposed TXC project DEIR

Matt. Thanks so much. I'm on the meeting but cannot participate after 10. Thus may not be present for oral comments

If you would, just read the first two points. Thank you.

Sent from my iPhone

> On Jul 17, 2020, at 8:14 AM, Matt Homolka <mhomolka@tcpud.org> wrote:

>
 > Carol, I need to know whether you wish to make an oral comment
 > yourself and for me to not read your email as soon as possible. If I
 > do not hear from you, I will assume that to be the case and will not
 > read your email. Thanks,

>
 > Matt Homolka, P.E.
 > Assistant General Manager/District Engineer Tahoe City Public Utility
 > District
 > 530.580.6042 Direct
 > 530.583.3796 Main Office ext. 342
 > www.tcpud.org

>
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 > -----Original Message-----

> From: Matt Homolka
 > Sent: Thursday, July 16, 2020 4:50 PM
 > To: Carol Pollock <carol_pollock@sbcglobal.net>
 > Cc: Sean Barclay (sbarclay@tcpud.org) <sbarclay@tcpud.org>; Terri
 > Viehmann (tviehmann@tcpud.org) <tviehmann@tcpud.org>; Kim Boyd
 > (KBoyd@tcpud.org) <KBoyd@tcpud.org>

I32-5

> Subject: RE: Questions and comments regarding proposed TXC project
 > DEIR
 >
 > Carol, you can always provide written comments at any time before the July 24th deadline.
 > If you would prefer to speak for yourself during the meeting, please confirm that is your plan and I will not read your email.
 > Thank you,
 >
 > Matt Homolka, P.E.
 > Assistant General Manager/District Engineer Tahoe City Public Utility
 > District
 > 530.580.6042 Direct
 > 530.583.3796 Main Office ext. 342
 > www.tcpud.org
 >
 >
 >
 >
 > -----Original Message-----
 > From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 > Sent: Thursday, July 16, 2020 4:46 PM
 > To: Matt Homolka <mhomolka@tcpud.org>
 > Subject: Re: Questions and comments regarding proposed TXC project
 > DEIR
 >
 > Matt thank you. If this is it, I would be happy to edit to more fully cover my concerns. Or, tear this up and I will take three minutes? Fine either way.
 >
 > Sent from my iPhone
 >
 >> On Jul 16, 2020, at 3:45 PM, Matt Homolka <mhomolka@tcpud.org> wrote:
 >>
 >> Carol,
 >>
 >> Thank you for your comments. We have discussed your request with the Board president. Given the difficulties of our current situation, she has agreed to allow a staff member to read your email during the public comment portion of the subject item. A few things to note:
 >>
 >> * Your email will be read verbatim. However, emphasis added by formatting or attachments will not be provided.
 >> * Oral public comments are limited to 3 minutes. Staff will cease reading your comments when that limit is reached.
 >> * Oral public comments are limited to 1 per person. This will be your one oral public comment. Please do not attempt to augment them during the meeting.
 >> * Regardless, the entirety of your emailed comments will be treated as a written comment on the draft EIR for the Tahoe XC Lodge Replacement and Expansion Project and will be responded to completely in the Final EIR.
 >>
 >> Sincerely,
 >>
 >> Matt Homolka, P.E.
 >> Assistant General Manager/District Engineer Tahoe City Public Utility
 >> District
 >> 530.580.6042 Direct
 >> 530.583.3796 Main Office ext. 342
 >> www.tcpud.org
 >>
 >>

I32-5
 cont.

>>
 >> -----Original Message-----
 >> From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 >> Sent: Tuesday, July 14, 2020 10:33 PM
 >> To: Terri Viehmann <tviehmann@tcpud.org>; Dan Wilkins
 >> <d.wilkins@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; John Pang
 >> <jpang@tcpud.org>; scottzumwalt@gmail.com; Gail Scoville
 >> <gscoville@tcpud.org>
 >> Cc: Sean Barclay <sbarclay@tcpud.org>; kboyd@tcpud.com; Matt Homolka
 >> <mhomolka@tcpud.org>
 >> Subject: Questions and comments regarding proposed TXC project DEIR

>> Dear Board Members,

>> I would appreciate it if the following questions and comments are read aloud and discussed during the upcoming Board meeting.

>> 1. Does the DEIR consider the dangerous winter traffic conditions on Old Mill Road? We have provided comments and photos of winter accidents to the Board in January. Some photos are included again. Does the Board consider increasing winter traffic on Old Mill in the interests of public safety? Of either residents or visitors to the TXC? How can Appendix D conclude that the proposed site D wouldn't result in a significant traffic safety impact?

>> 2. Is there a construction budget and operating budget for this project? What are the financial consequences of low snow years for TXC?

>> What are the consequences of significant operating deficits?

>> 3. What regulatory approvals are required for the construction and coverage of a large building and significant paving of meadow and forest and tree removal? Have they been sought?

>> Thank you,

>> Carol Pollock
 >> 405 Old Mill Road

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I32-5
 cont.

Letter I32 Carol Pollock

July 17, 2020

Response I32-1

The comment requests that the comment letter be read aloud and discussed during the July 17 public meeting. As noted under Section 3.3.4, "Public Meeting," below, a letter provided by Carol Pollock was read aloud at the July 17 public meeting. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I32-2

The comment asks whether the Draft EIR considers the dangerous winter traffic conditions on Old Mill Road. The comment notes that comments and photos of winter accidents were provided to the Board in January. Additionally, the comment asks whether the Board considers increasing winter traffic on Old Mill Road in the interests of public safety. Finally, the comment asks how Appendix D could conclude that the proposed site D would not result in a significant traffic safety impact.

As described in Master Response 1: Transportation Safety, the Transportation Analysis prepared by LSC included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and historical crash data analysis. The historical crash data included the winter months, and based on the analysis presented in the Section 7, "Transportation Safety Analysis," of the Transportation Impact Analysis and was summarized in Master Response 1: Transportation Safety. As discussed further in Master Response 1, the safety analysis determined that no undue transportation safety-related concerns related to conditions along Old Mill Road are expected to result with implementation of the proposed Project because, based on historical crash data, the crash severity on Old Mill Road has been relatively low; TRPA's Lake Tahoe Region Safety Strategy study did not identify Old Mill Road as a priority location for safety improvements; and although the proposed Project would increase traffic on Old Mill Road, the resulting daily traffic volumes would not exceed the County standards for traffic volumes on a residential street. The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during review of the merits of the Project.

Response I32-3

The comment asks if there are construction and operating budgets for the Project, what the financial consequences of low snow years would be for Tahoe XC, and what the consequences would be of significant operating deficits. The financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I32-4

The comment asks what regulatory approvals are required for construction of the Project and tree removal and if they have been sought. A summary of the permits and approvals that are required for the Project is provided in Section 1.3, "Required Permits and Approvals," in Chapter 1, "Introduction," of the Draft EIR. These include permits or approvals by TRPA, the Conservancy, Placer County, Lahontan RWQCB, PCAPCD, SHPO, NTFPD, TCPUD, and Tahoe-Truckee Sanitation Agency. TRPA would approve a permit for tree removal for the Project. The EIR must be approved prior to the applicant seeking additional regulatory approvals or permits from the applicable agencies. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I32-5

The comment requests that comments submitted by the letter's author be read during the public meeting on July 24. These comments are identical to comments I32-1 through I32-4. See responses to comments I32-1 through I32-4. As noted under Section 3.3.4, "Public Meeting," below, a letter provided by Carol Pollock was read aloud at the July 17 public meeting. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

From: [Monica Grigoleit](#)
To: [Kim Boyd](#)
Subject: Schilling Lodge
Date: Wednesday, July 15, 2020 4:02:30 PM

**Letter
I33**

Hi Kim,

I have several questions about the Schilling Lodge:

- 1) Who will be funding the Lodge after the first year? I I33-1
- 2) Will there be speed bumps put on Polaris, Old Mill and Village or any other necessary streets in the Highlands to accommodate more traffic down those streets? I I33-2
- 3) Will private functions be allowed at the Lodge? Or excess of public functions that increases traffic? I I33-3
- 4) Will the public housing project be downsized to accommodate the further impact on the Highlands neighborhood? I I33-4

Thank You,
Monica Grigoleit
3180 Watson Drive

Letter I33 Monica Grigolet

July 15, 2020

Response I33-1

The comment asks who will be funding the Schilling Lodge after its first year. The financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I33-2

The comment asks whether there will be speed bumps put on Polaris Road, Old Mill Road, and Village Road or any other necessary streets in the Highlands neighborhood to accommodate more traffic down those streets.

There are no speed bumps proposed as part of the Project. The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I33-3

The comment asks if private functions would be allowed at the Schilling Lodge or if there would be public functions that would increase traffic. Public and private events that could be held at the Schilling Lodge are described under "Special Events" beginning on page 2-14 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR. Table 2-3 on page 2-13 identifies the maximum number of events, public or private, that could occur at the Schilling Lodge each year. As discussed under "Methods and Assumptions" beginning on page 3.5-12 in Section 3.5, "Transportation," and shown in Tables 3.5-2, 3.5-3, 3.5-4, and 3.5-5, the increase in visitors at the Schilling Lodge associated with events are considered in the transportation analysis. This comment does not provide any specific evidence that relates to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I33-4

The comment asks if the public housing project would be downsized to accommodate further impacts on the Highlands neighborhood. It is assumed that the comment is referring to the Dollar Creek Crossing project, which is identified as one of the cumulative projects analyzed in the cumulative analysis for the proposed Project and Alternative A (see Table 3.1-2 beginning on page 3-5 under Section 3.1.5, "Cumulative Setting," in the Draft EIR). Cumulative impacts are discussed in each resource section (Sections 3.3 through 3.12 of the Draft EIR), following discussions of the Project-specific impacts and consider the cumulative effects of the proposed Project and Alternative A combined with the Dollar Creek Crossing project along with other cumulative projects. This comment is not related to the proposed Project and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

From: [John Pang](#)
To: [Kim Boyd](#)
Cc: [Sean Barclay](#)
Subject: Comments on DEIR
Date: Wednesday, July 15, 2020 1:50:08 PM

Letter I34

Hi Kim,

Sean said to submit these comments about the DEIR to you directly. They don't need to be part of the official comments unless you feel they do...

I34-1

1) section 3-15: 3.2.9 regarding the building materials. I don't believe that the fire codes will allow any type of wood shake or shingle roof on the building.

I34-2

2) under the "utilities" section, page of 20:

Under the California Building Standards Title 24, 3rd paragraph, last sentence:

I would suggest deleting this as the City of South Lake Tahoe has no relevance in this project.

I34-3

3) I will send a screen shot of a typo in the LSC report. This program won't let me send it as part of this email.

I34-4

Thanks!!

John Pang

Get [Outlook for iOS](#)

Letter I34 John Pang

July 15, 2020

Response I34-1

The comment provides an introduction to the comment letter. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Response I34-2

The comment refers to Section 3.2.9, "Wildfire," on page 3-15 of the Draft EIR and states the belief that fire codes would likely not allow any type of wood shake or shingle roof on the building. The Schilling Lodge would use a product that best matches historic character of original roof but complies with applicable fire and building codes (Heapes, pers. comm., 2020). The Secretary of Interior's Guidelines for Rehabilitation (NPS 2020b) include provisions for rehabilitation of historic structures while also meeting the requirements of local codes related to life safety and resilience to natural hazards. Thus, construction of the Schilling Lodge utilizing a product that looks similar to the original wood shake roof but meets local fire code requirements would not result in a significant impact to the historical significance of or alter the historic character of the Schilling residence. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I34-3

The comment provides a correction to Section 3.11, "Utilities," to remove a reference to the City of South Lake Tahoe as it has no relevance to the Project. The comment is correct and Section 3.11 is revised in this Final EIR. The correction does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 3 on page 3.11-3 of the Draft EIR is revised to read as follows:

Where a local jurisdiction has not adopted a more stringent construction and demolition (C&D) ordinance, construction activities are required to implement Section 5.408 of the CALGreen Code. Under Section 5.408, construction activities are required to recycle and/or salvage for reuse a minimum of 65 percent of their nonhazardous C&D waste as of January 1, 2017. Applicable projects are required to prepare and implement a Construction Waste Management Plan, which is submitted to the local jurisdiction before issuance of building permits. Placer County ~~The City of South Lake Tahoe~~ does not currently have an adopted C&D waste management ordinance.

Response I34-4

The comment states the letter's author will send a screen shot of a typo in the LSC report. The comment letter does not include any attachments or screen shots of this typo. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate.

17 July 2020

Letter
I35

BOARD OF DIRECTORS - TCPUD

TAHOE CITY, CALIFORNIA 96145

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

It is sad that this project has come to fruition at all, existing so that yet another multi-millionaire could remove a historic home to build their modern lakefront estate, and try to glean a tax write-off by forcing it on a residential community of largely primary homeowners that does not need it, does not want it, and would prefer the Schilling Lodge have been left in its lakefront glory.

I35-1

1. This project, when initially proposed and finally communicated to the residents of the Highlands was 'sold' to us as a moderate expansion of the TXC building in 'Site A'. However, it quickly became obvious that there was a stated preference to relocate the lodge to the site off of Polaris adjacent to the High School and that in many ways this was a foreordained outcome. This is well documented in the TCPUD website where it is not even mentioned that Site A, the current location, is even under consideration. From the TCPUD website: *"the proposed Project involves replacing and relocating the lodge to a site off Polaris Road adjacent to the North Tahoe Middle/High School."*

I35-2

2. The project cites its desire to preserve the 'Historic Schilling Lodge' but then proposes to over double the size of the historic lodge to meet the needs of the TCCSEA. However, according to The Department of the Interior's Standards for the Treatment of Historic Properties With Guidelines For Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, page 25, "A new exterior addition to a historic building should be considered in a rehabilitation project only after determining that requirements for a new or continuing use cannot be successfully met by altering non-significant interior spaces. "

I35-3

3011 Polaris Rd, Tahoe City, California 96145

The deployment of the Schilling Lodge at Site A would allow for the use of the current site and out-buildings plus the incremental, non-modified 4,607sf building to meet the usage requirements and maintain compliance with the Department of the Interior's regulations.

I35-3
cont.

The choice of Site D/Polaris and the expansion of the Schilling lodge intentionally is non-compliant with these regulations for preserving this historic structure.

3. The Schilling Lodge was a Lakefront Property, and again, in accordance with the Department of the Interior's Standards for the Treatment of Historic Properties With Guidelines For Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, page 66: Not Recommended: "Removing or relocating historic buildings or landscape features, thereby destroying the historic relationship between buildings and the landscape in the setting." and "Altering those building and landscape features of the setting which are important in defining its historic character so that, as a result, the character is diminished."

I35-4

In this project the Schilling Lodge is being relocated from a prominent lakefront venue in Homewood and being altered in clear violation of the Department of the Interiors standards.

4. The project 'needs' cite that higher elevations trails tend to hold snow longer and extend the cross-country skiing season. While this is, at its most simple interpretation correct, the altitude difference between Site A and Site D is 76 feet. The current pace of advancing temperatures due to global climate change marginalize the efficacy of this argument – in order to provide a viable long-term investment for Tahoe XC the facility would need to be completely re-sited at approximately 7500-8000' in order to provide a 20-30 year viable usage. Anything less than this compromises the entire financial model of the project.

I35-5

5. Private Event Usage: The current plan envisions up to 34 annual private events that could include weddings, rehearsal dinners, and other activities running every weekend in the spring, summer, and fall at the Schilling Lodge. These events, at which alcohol would most likely be served would be within a few hundred feet of a High School. Additionally, they would be in a residential neighborhood with many small children and families. This project proposes to reclassify residential zoned lots on Polaris Rd and utilize them for commercial purposes and puts drivers, likely to be under the influence of alcohol following weddings and rehearsal dinners on dark streets, with no speed controls, and no sidewalks.

I35-6

Any usage of the Schilling Lodge in Site A or Site D should completely ban the selling, serving, and private consumption of alcohol and any controlled substances – especially if located next to academic institutions.

6. COVID-19 Concerns. In the current pandemic climate and with no near-term end in sight to the limitations of public gatherings, as evidenced by the streaming of this TCPUD meeting and a worsening of the crisis across the US and in California we should be significantly re-evaluating any commercial venture that is predicated on gatherings and high-density human interactions for its ongoing sustainability and success.

I35-7

This project needs to be thoroughly reconsidered in lite of social distancing guidelines and should be re-evaluated based on its dense packing of people into a large number of financially necessary private and public gatherings.

7. Figure 2-5, Proposed Site Plan: It is non-obvious as to why this project is not trying to share parking with NLTHS which would maintain compliance with Placer County Tahoe Area Basin Plan requirements for shared parking.

I35-8

8. Project Goals: "Construct a new lodge that minimizes effects on the neighborhood." The consolidation of both the North Lake Tahoe Middle/High School and Tahoe XC as well as the planned event-space usage of the lodge does not, in any way, minimize the effect on the neighborhood. The following must be considered:

I35-9

	Polaris Site	Current Site	Comments
Impact 3.3-2: Tree Removal	183 Trees Removed	79 Trees Removed	230% more trees killed in Polaris Site
Impact 3.5-5: Construction-Related Impacts on Traffic	Single roadway, no sidewalks, heavily used by walking/biking students as primary way to/from school	Multiple ingress/egress paths during emergency by usage of the paved multi-use path, and it is not a common pedestrian street due to no school transit.	Polaris Site is impossible to support heavy construction with 'lane closures and detours' per DEIR recommendation.
Impact 3.8-1: Construction Noise	Construction noise would impact students learning and local households	Construction Noise impacts local households	

I35-10

I35-11

I35-12

Impact 3.8-2: Construction Vibration	New roadway passes less than 50' from Polaris households	No new driveway/roadways	Polaris Site would cause significant potential impact to adjacent homes, what is damage/loss coverage for this project and indemnification plan?	I35-13
Impact 3.8-3: Operational Event Noise	Significant Impact to households and to students	Significant Impact to Households	While the Polaris site has a greater impact neither side of the Highlands neighborhood is in favor of late-night events with amplified music such as weddings, parties, retreats, and such in a residential zoned area. The ~70 decibel standard at 50 feet is the equivalent of standing 25 feet from a freeway with cars going 65mph.	
Parking	1.5 acres of asphalt coverage for 100 cars and 2 buses	1 acre of asphalt coverage for 100 cars and 2 buses	Reusing the current site is 30% less TRPA coverage and far more environmentally friendly. However, Site D could be implemented with no driveway or dedicated parking and just reuse shared parking with NLTHS – which would be a smart alternative and	I35-15

			be compliant with Policy T-P-13 of the Area Plan, which states that Placer County shall encourage shared-parking facilities to more efficiently utilize parking lots.	I35-15 cont.
New Land Coverage	81,593 sq. ft.	67,619 sq. ft.	Site A, in total saves approximates ¼ acre of total land coverage and about 20% less than Site D.	I35-16
Traffic - Velocity	<p>“The majority of speeds recorded on Polaris Road are above the speed limit”</p> <p>“The maximum recorded speed was 42 mph.”</p> <p>There have been multiple police reports in the spring of 2020 for vehicles exceeding 50mph on Polaris Rd enroute to/from the NLTHS.</p>	<p>“The recorded speeds on Village Road were generally lower than the speed limit”</p> <p>“The average observed speed was 18 mph”</p>	<p>Polaris Rd is already dangerously fast, highly trafficked, and has a higher number of pedestrians and students and bikers on it than Village Rd.</p> <p>The Proposed site threatens the lives of students and residents due to the high speeds and lack of pedestrian facilities on Polaris Rd.</p>	I35-17

Traffic – Trip Generation	149 Vehicle Trips (Winter Weekend Daily Net)	117 Vehicle Trips (Winter Weekend Daily Net)	27% more trips at Site D than Site A	I35-18
Traffic - Current	1,370 Average Daily Trips – Weekday 183 Weekend ADT 7,216 AWT	499 ADT – Weekday 815 Weekend ADT 4,125 AWT	Currently Polaris has 74.9% more traffic on a weekly basis than Village (Site-A).	I35-19
Traffic – Proposed Site D	9,554 Average Weekly Trips	2,715 Average Weekly Trips	The proposed plan results in a significant imbalance in traffic load on Polaris vs Village – with Polaris growing from 74.9% more traffic to 351% more traffic than Village. It is exceedingly likely that peak days will result in more than 2500 daily trips in Polaris which is the maximum sustainable for a residential street per guidelines.	I35-20

9. Minimum Sight Distance for Driveway on Polaris: While we have already discussed that the proposed driveway on Polaris and the re-zoning of residential lots for a commercial use-case is an inherently bad idea that could be mitigated by reusing the NLTHS parking facilities it is also worth noting that the proposed driveway

does not meet the engineering standards for Minimum Sight Distance for stopping due to the natural curvature and high berms on the north side of Polaris Rd.

“Due to the horizontal curvature and existing embankments on the northern side of Polaris Road, the sight distance looking east would be approximately 250 feet; and thus, would not meet the minimum corner sight distance standard.”

The project however, then notes that a 30mph vehicle can stop in 200’ as a fallback to expedite this haphazard and unsafe project. While this may be true on dry roadways it is worth noting a few factors for fair consideration by the TCPUD:

- Polaris Road is naturally sloped and often drains across the roadway resulting in wet roadway conditions.
- Peak days for XC skiing are often days that have both fresh snow, ice, and melted runoff.
- Polaris Road already experiences higher than normal traffic volumes for a residential street and the speeds on it were clocked at up to 42mph during a one-day study and police reports indicate that speeds of >50mph have been commonplace.

Failure to adhere to Department of Transportation Sight Stopping Distance guidelines and the Caltrans Highway Design Manual guidelines will further endanger the lives of residents, students, and pedestrians on this already crowded street. Shockingly this was deemed to be ‘Less than Significant’ by the consultants engaged.

10. Zoning and Land Use Designation – when reviewing the alternative sites it became apparent that many of the alternative locations were removed from consideration for good reason. Good reason being, “This alternative was rejected from further consideration because it would be located within the Highlands Subdistrict, which is zoned and designated residential and the Project would not be consistent with this land use designation.” However, the primary choice, preferred by the TCCSEA, Site D – Polaris Rd, also requires that a commercial driveway be placed on residentially zoned and designated land – the two lots adjacent to 3011 Polaris Rd.

I35-21
cont.

I35-22

Summary:

The obvious preference from myself and many other residents of the Highlands is simply, 'No Project'. This is an unwanted interference in a primarily single-home, primary residence community of citizens of Tahoe City. We kindly ask that the TCPUD cancel this project and that the multi-millionaire Bay Area developer who decided to build a lakefront home and ruin a historical lodge on the West Shore return it to its lakefront setting and maintain compliance with the Department of the Interior's Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings. There are several lakefront lots available for purchase in the Tahoe City and Dollar Point area that would be outstanding for the Schilling Lodge.

I35-23

Per the EIR Section 4-8, Page 326: "the No Project Alternative would be the environmentally superior alternative."

I35-24

If for some reason the TCPUD board decides to continue this misbegotten project it is worth documenting that every metric on impact favors maintaining Site A the current location over Site D the Polaris location. It is hard for me to imagine that 76' of elevation gain and a slightly flatter starting area is worth:

- Increased traffic to almost residential street maximums
- Increased ground cover in a pristine meadow and wooded area
- Increased tree removal, many of which are mature old growth conifers
- Clear violation of land use zoning and covenants
- Increased danger to students and pedestrians – common on Polaris
- The consistent and ready introduction of alcohol and other controlled substances in close proximity to an education institution.

I35-25

And failing this, if Site D is chosen – at least honor and align with the Placer County Tahoe Area Basin Plan that designates the two lots (3013/3015) on Polaris Road as Residential Zoned and comply with the Placer County Tahoe Area Basin Plan, page 88, guidance on the use of 'shared parking' by removing the large paved area and sharing the parking facilities with NLTHS.

Thank you for your time and consideration.

SINCERELY,
DOUGLAS GOURLAY

Letter I35 Douglas Gourlay

July 17, 2020

Response I35-1

The comment expresses opposition to the Project and opinions related to the use of the historic Schilling residence. The comment also requests the comments be read aloud at the public meeting on July 17. This comment letter was not read aloud during the public meeting because the author himself provided oral comments (see response to comments PM1-4 through PM1-9). The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-2

The comment provides background information related to the development of the Project and presents the belief that there was a preference for relocating the lodge to the proposed Project site (Site D). The comment notes the TCPUD website does not mention Site A is under consideration.

As described on page ES-2 in the "Executive Summary" chapter (and also on page 2-1 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail"), "Site D – Full Project (proposed Project) is the "proposed project" for purposes of CEQA, and is the project described in the project description of this EIR consistent with State CEQA Guidelines Section 15124." CEQA requires that the EIR identify a proposed project. Because of the controversial nature of the Project, TCPUD elected to analyze an alternative to the proposed Project at an equal level of detail to the analysis of the proposed Project (see page 2-1 of the Draft EIR):

While not required by CEQA, this approach was selected by the TCPUD Board to provide them with analysis of the proposed Project and Alternative A at an equal level of detail to allow them the flexibility to potentially approve a CEQA compliant project at either location. Possible reasons for this could include insurmountable difficulty in obtaining permitting for the proposed Project, failure to complete the land exchange with the Conservancy, unavoidable environmental impacts of the proposed Project, and/or strong community and political opposition. In the event that any of these conditions occur, Alternative A is analyzed at this level of detail so that the EIR provides sufficient analysis to enable TCPUD to approve that alternative, should that course of action be the ultimate decision of the TCPUD Board.

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-3

The comment states that deploying the Schilling Lodge at Site A would allow adaptive reuse of the Schilling residence without alterations and therefore selection of Site D as the proposed Project is intentionally non-compliant with the Secretary of the Interior's Standards. The comment is suggesting an additional alternative for evaluation and asserts that the proposed Project and expansion of the Schilling Lodge is non-compliant with the Secretary of the Interior's Standards. See response to comment I10-18, which discusses the analysis of alternatives in the Draft EIR, including alternatives with limited expansion to the original Schilling residence. See responses to comments I10-10, I35-4, and I41-23, which address the comment's concerns related to the Secretary of the Interior's Standards.

Response I35-4

The comment states that moving the Schilling residence from its original lakefront location is a violation of the Department of the Interior's Standards. The Secretary of the Interior's Standards (Standards) are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Secretary of the Interior's Guidelines (Guidelines), which are separate from the Standards, offer general design and technical recommendations to assist in applying the Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historic property (NPS 2020b). There are Standards and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction, depending on which treatment is appropriate for the historic building. The ten Standards for Rehabilitation, as listed

on page 3.4-3 of Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," in the Draft EIR, do not directly speak to relocation or setting.

While the Guidelines for Rehabilitation do recommend against relocation of a historic building, the Guidelines are advisory, not regulatory (NPS 2020b). As described on page 3.4-15 of the Draft EIR, while the axial and spatial relationship of the building to the frontage on Rubicon Bay is one of the many character defining features of the Schilling residence, consultation with the State Historic Preservation Office (SHPO) resulted in the conclusion that moving the historic building would not result in a significant impact to its historical significance, provided the Schilling Lodge retains the original building orientation when reconstructed.

Response I35-5

The comment summarizes the need for locating the Schilling Lodge at a higher elevation, and notes that there is a 76-foot elevation difference between the proposed Project site and the Alternative A site. The comment suggests that because of climate change, relocating the lodge to an elevation of 7,500-8,000 feet would allow for longer term usage. Although it is true that under future climate change scenarios, precipitation patterns in the Tahoe region are anticipated to change, the Project still maintains the Project objective to maximize the base elevation of the lodge site (see page 2-6 of the Draft EIR), which can be done by moving the location of the lodge to the proposed Project site (Site D). Although the elevation increase may be slight, the Draft EIR notes on page 2-5, "[c]onnections between the Existing Lodge and the trail network are at a lower elevation and are exposed, so they do not hold snow as long as other portions of the network. Melted snow serves as a barrier between the Existing Lodge and the trail network." Additionally, the Draft EIR notes on page 2-23 under Section 2.6.1, "Proposed Project (Site D – Full Project)," "[t]he location of this site would also place the lodge adjacent to beginner terrain, which would improve access for beginning skiers." Thus, the proposed site represents the maximum elevation gain feasible at the location of cross-country ski trails that are accessible near Tahoe XC and provides closer, more direct access to the portions of the trail system that are much higher and retain snow for more weeks in each year. This direct access allows skiers to avoid trail sections that often experience less snow cover due to wind conditions and sun exposure and that melt out the earliest.

Additionally, locating the lodge at the proposed Project site allows beginner, infrequent, and some senior skiers to avoid the hill at the start of the existing trail system, which presents as a significant obstacle to these skiers. Beginner ski lessons for all ages require flat terrain to establish gliding and striding technique, proper polling, and proper balance. Descending the hill in sometimes icy conditions for inexperienced skiers is also a safety concern.

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-6

The comment summarizes the number and type of events that could be held at the Schilling Lodge and notes that alcohol could be served at the events, which is at a location within a few hundred feet of North Tahoe High School and in a residential neighborhood. The comment asserts that the proposed Project and Alternative A should completely ban the selling, serving, and private consumption of alcohol or any controlled substances, especially if located next to academic institutions. The comment also notes the Project proposes to reclassify residential zoned lots on Polaris Road and utilize them for commercial purposes. See response to comment I10-19, which addresses concerns related to the presence of alcohol at the Schilling Lodge.

The comment is incorrect in stating that the Project would rezone residential parcels. Neither the proposed Project nor Alternative A would include rezoning. As stated on page 2-23 of the Draft EIR, "[the proposed Project site] is located in the North Tahoe High School Subdistrict and zoned for recreation in the Area Plan; the proposed Project site also has a land use designation of Recreation in the Area Plan and the TRPA Regional Plan (Placer County and TRPA 2017, TRPA 2018)." Page 2-26 of the Draft EIR states, "Like the proposed Project, the Alternative A site is also located in the North Tahoe High School Subdistrict and zoned for recreation in the Area Plan and has a land use designation of Recreation in the Area Plan and the TRPA Regional Plan."

The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-7

The comment notes concerns related to the COVID-19 pandemic and suggests that commercial venture predicated on gatherings and high-density human interactions should be re-evaluated. The comment's opinion to re-evaluate such commercial endeavors is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-8

The comment states it is not clear why the Project is not trying to share parking with North Lake Tahoe High School, which would maintain compliance with the Area Plan requirements for shared parking. The "Parking" section on page 2-11 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR states:

the Project applicant is in the process of pursuing a shared-parking agreement with the Tahoe Truckee Unified School District to allow for shared parking during high-use events. Importantly, use of parking at the school by TCCSEA (particularly for events such as the Great Ski Race or the Great Trail Race) would occur outside of school hours. For North Tahoe High School and North Tahoe Middle School, shared parking could be used by spectators and buses in the Schilling Lodge parking lot during school-sponsored sporting events.

Thus, the Project is seeking to establish a shared parking agreement with the school; however, the shared parking would only occur outside of school hours for high-use events hosted out of the Schilling Lodge. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-9

The comment cites the Project objective, "Construct a new lodge that minimizes effects on the neighborhood." The comment states the Project along with consolidating the North Lake Tahoe Middle School and North Lake Tahoe High School do not minimize effects on the neighborhood. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-10

The comment refers to Impact 3.3-2, "Tree Removal," and compares the number of trees that would be removed at the Polaris site to the number of trees that would be removed at the current site. As analyzed under Impact 3.3-2 on pages 3.3-17 through 3.3-20 of the Draft EIR, the removal of trees by both the proposed Project and Alternative A would result in a potentially significant impact. Additionally, both the proposed Project and Alternative A would be required to implement Mitigation Measure 3.3-2, which would minimize or avoid tree removal impacts through the design and permitting process and reduce the impact to a less-than-significant level. This comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-11

The comment states that it is impossible for Polaris Road to support the construction and associated lane closures and detours detailed in the Draft EIR.

Impact 3.5-5 starting on page 3.5-28 of the Draft EIR addresses potential construction-related traffic impacts resulting from implementation of the Project and includes Mitigation Measure 3.5-5, which requires the applicant to prepare and implement a temporary traffic control plan during construction activities. Additionally, Impact 3.5-5 starting on page 3.5-28 describes that the duration of construction, number of trucks, truck routing, number of employees, truck idling, lane closures, and a variety of other construction-related activities are unknown at this time. Therefore, it is not known whether the Project would require lane closures and detours and the comment does not provide any specific evidence that Polaris Road would not be able to accommodate construction-related traffic effects with the implementation of Mitigation Measure 3.5-5. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-12

The comment states that construction noise at the Polaris site would impact students at local schools and local households, and that construction noise at the current site would impact only local households. However, the comment does not provide any evidence that the noise impact analysis presented in the Draft EIR is inadequate. Page 3.8-10 in Section 3.8, "Noise," describes all existing nearby sensitive receptors that were evaluated, and construction noise was estimated at these receptors. Considering local standards and typical construction activities, it was determined that construction noise would not result in significant impacts at any nearby receptor. No further analysis is required.

Response I35-13

The comment states that construction would result in damage to homes at the Polaris site and asks what the indemnification plan is. Impact 3.8-2 in Section 3.8, "Noise," of the Draft EIR evaluated the potential for construction vibration to result in human disturbance as well as damage to existing structures. As discussed on pages 3.8-16 and 3.8-17 of the Draft EIR, anticipated construction activities would not be located within distances where vibration has the potential to result in building damage. Therefore, impacts to existing structures were deemed less than significant. The comment does not provide any evidence that the vibration impact analysis presented in the Draft EIR is inadequate; therefore, no further analysis is required.

Response I35-14

The comment states that nearby neighborhoods are not in favor of late-night events. The comment expresses opposition to the proposed Project and Alternative A. It does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-15

The comment, related to parking, states that reuse of the current site would result in 30 percent less TRPA coverage and would be far more environmentally friendly. Additionally, the comment states that Site D could be implemented with no driveway or dedicated parking and just reuse shared parking with North Lake Tahoe High School, which would be a smart alternative and be compliant with Policy T-P-13 of the Area Plan, which states that Placer County shall encourage shared-parking facilities to more efficiently utilize parking lots.

The amount of proposed land coverage, including asphalt and total coverage, for the proposed Project is included in Table 3.9-4 on page 3.9-13 in Section 3.9, "Geology, Soils, Land Capability, and Coverage," of the Draft EIR and for Alternative A is included in Table 3.9-5 on page 3.9-14. Total coverage for Alternative A (67,619 square feet (sq. ft.)) would be approximately 17 percent less than the proposed Project coverage (81,593 sq. ft.). The amount of asphalt area required for Alternative A (49,446 sq. ft.) would be approximately 20 percent of the amount of asphalt required for the proposed Project (61,379 sq. ft.). Section 4.8.2, "Impacts Related to Tree Removal, Coverage, Utilities, and Construction," in Chapter 4, "Alternatives," of the Draft EIR provides a summary comparison of impacts related to coverage between the proposed Project and Project alternatives. Although the proposed Project would result in a greater amount of coverage than Alternative A, the amount of new coverage for the proposed Project and all alternatives is allowed and would comply with TRPA Code and other applicable regulations. The alternatives analysis and determination of the environmentally superior alternative is based on the whole of the proposed Project and alternatives, not one factor. See response to comment I11-2, which addresses concerns about the environmentally superior alternative.

The Project includes a proposal to coordinate with the high school to establish a shared-parking agreement that would allow for shared parking during high-use events outside of school hours. For North Tahoe High School and North Tahoe Middle School, shared parking could be used by spectators and buses in the Schilling Lodge parking lot during school-sponsored sporting events. Shared parking between Tahoe XC and the schools would not likely be feasible during school hours.

The comment provides no evidence as to why reuse of the Existing Lodge site would be more environmentally friendly than the proposed Project. Additionally, the remainder of the comment proposes a change to the Project and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Response I35-16

The comment notes the proposed Project would result in 81,539 sq. ft. of coverage, and the current site would result in 67,619 sq. ft. of coverage, noting also that Site A would result in a smaller increase in coverage over existing conditions than the proposed Project at Site D. The Draft EIR analyzes the potential impacts related to coverage under Impact 3.9-3 on pages 3.9-13 through 3.9-14 in Section 3.9, "Geology, Soils, Land Capability, and Coverage." Because the proposed Project and Alternative A would comply with TRPA land coverage regulation, they would each have a less-than-significant impact relative to land coverage. This comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate; therefore, no further response can be provided.

Response I35-17

The comment states that Polaris Road is already dangerously fast, highly trafficked, and has a higher number of pedestrians and students and bikers on it than Village Road. The comment concludes that the proposed Project threatens the lives of students and residents due to the high speeds and lack of pedestrian facilities on Polaris Road.

As detailed on page 3.5-1 of the Draft EIR, the Transportation Analysis in Appendix D includes a more comprehensive discussion of the transportation setting in the Project area including historical crash data, driveway spacing, and results of speed surveys. Please refer to Table 18 in Appendix D for speed survey results in the Highlands Community. Additionally, a summary of the results of the speed survey conducted along Polaris Road is shown on page 3.5-10 of the Draft EIR. Please see Master Response 1: Transportation Safety. Finally, the comment does not provide any evidence as to why the Project would threaten the lives of students by generating additional traffic along Polaris Road.

Response I35-18

The comment states that Site D would generate 27 percent more trips than Site A. The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-19

The comment states that Polaris Road currently has 74.9 percent more traffic on a weekly basis than Village Road (Site A). The comment does not raise any CEQA issues or address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-20

The comment states that the proposed plan results in a significant imbalance in traffic load on Polaris Road as compared to Village Road, with Polaris growing from 74.9 percent more traffic under existing conditions to 351 percent more traffic than Village Road with implementation of the proposed Project. Additionally, the comment states it is exceedingly likely that peak days will result in more than 2,500 daily trips on Polaris Road which is the maximum sustainable for a residential street per guidelines.

Impact 3.5-2, starting on page 3.5-21 of the Draft EIR analyzes in detail whether the Project would result in traffic volumes on a residential roadway exceeding 2,500 vehicles per day. The analysis concluded that Project-related traffic would not cause traffic volumes on residential roadways to exceed Placer County's 2,500 vehicles per day standard for residential roadways and this impact would be less than significant. Additionally, the comment does not provide any evidence to support the claim that the proposed Project would result in more than 2,500 daily trips on Polaris Road. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-21

The comment states that the proposed driveway does not meet the engineering standards for minimum sight distance for stopping. The comment raises a concern regarding wet/snowy/icy road conditions on peak days for cross-country skiing. In addition, the comment states that Polaris Road already experiences higher than normal traffic volumes for a residential street and the speeds on it were clocked at up to 42 mph during a one-day study and police reports indicate that speeds greater than 50 mph have been commonplace.

As discussed on page 3.5-23 in Section 3.5, "Transportation," of the Draft EIR, although the proposed Project driveway location does not meet the corner sight distance standards, it does meet the minimum stopping sight distance value of 200 feet for the measured 85th percentile speed (i.e., 30 mph). Additionally, although not stated in the Transportation Impact Analysis, the minimum stopping sight distance value would be met even with a 35 mph design speed. See Master Response 1: Transportation Safety for details related to the portion of the comment addressing winter conditions, minimum stopping sight distance, speed, and traffic volumes. It should be noted that "Unsafe speed" was not recorded as a factor in any of the three crashes reported during the 10-year period along Polaris Road. Additionally, the comment provides no evidence to support the claims related to specific speeds along Polaris Road. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-22

The comment notes that alternative sites to the proposed Project were removed from consideration because it would be located on land zoned and designated residential and would not be consistent with the land use designation. The comment asserts the proposed Project also requires a commercial driveway be placed on residentially zoned and designated land. The comment is correct that the land use designation was one of the factors considered in dismissing two of the six alternatives considered and not evaluated further: the Site B – Site at the End of Highlands Drive alternative and the Site C – Site at the End of Cedarwood Drive (see pages 4-4 and 4-5 in Chapter 4, "Alternatives," in the Draft EIR).

The two parcels, 093-600-001 and -002, owned by TCPUD that are located adjacent to the parcel that would contain the proposed Project driveway are designated and zoned for residential use. Figure 2-5, "Schilling Lodge Site Plan," is a preliminary design of the proposed Project that shows a narrow portion of the driveway could be located on the adjacent parcel; however, these drawings are preliminary and final design would locate the driveway within APN 093-160-064, which is designated for recreation use. Thus, the comment is incorrect that any portion of the proposed Project site is designated and zoned for residential use. See response to comment I35-6, which addresses the land use and zoning designation on the proposed Project site and Alternative A site. As discussed therein, the Project site is zoned as Recreation and the Project is consistent with that designation; thus, the Project is not considered a Commercial use.

Response I35-23

The comment expresses support for the No Project Alternative. The comment asks TCPUD to cancel the Project and the owner of the property that originally contained the Schilling residence return the building to the original location. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-24

The comment states the No Project Alternative is the environmentally preferred alternative. The comment is true; however, as stated on page 4-20 under Section 4.8, "Environmentally Superior Alternative," in Chapter 4, "Alternatives," in the Draft EIR, "Section 15126.6 of the State CEQA Guidelines states that 'if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.'" As discussed on page 4-22, the proposed Project was determined to be the environmentally superior alternative. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I35-25

The comment asserts Alternative A is the favorable choice based on comparison of the impacts from Alternative A and the proposed Project. The comment states it is hard to imagine a 76-foot elevation increase and slightly flatter starting area is worth some of the impacts that would occur from implementation of the proposed Project. The comment requests that if Site D is chosen, the Project should comply with the residential zoning designation and shared parking policy of the Area Plan. The comment expresses support for Alternative A over the proposed Project.

The comment is inaccurate in asserting that the proposed Project site is zoned residential. See response to comment I35-6, which addresses the zoning and land use designation of the proposed Project site. The comment offers no specific information or evidence that the analysis presented in the Draft EIR is inadequate. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Douglas Gourlay](#)
To: [Terri Viehmann](#); [Dan Wilkins](#); [Judy Friedman](#); [John Pang](#); [Scott Zumwalt](#); [Gail Scoville](#); [Kim Boyd](#); [Matt Homolka](#); [Sean Barclay](#)
Subject: Re: Written Comments on TXC DEIR Project for 17 July TCPUD Board Meeting
Date: Friday, July 17, 2020 9:51:46 AM

**Letter
I36**

Based on the last, rather erudite, question asked I'd like to ask for a statement from all TCPUD board members and TXC Board Members that verifies there are no conflicts of interest. Specifically, each board member should disclose if they:

- Live in proximity to the transit corridors for Site A or Site D
- Have any commercial interest - salary, investment, contracting, sub-contracting or any financial benefit from them or a household member that would stem from this project
- Have any commercial interest in the property development that replaced the Schilling Lodge or in the removal, maintenance, storage, rehabilitation of the Schilling Lodge

I36-1

A clear statement from each board member from TXC and TCPUD would go a long way in helping the residents of The Highlands know that this decision is safely in the hands of non-conflicted individuals and that there is no violation of the public trust or self-dealing.

On Fri, Jul 17, 2020 at 12:10 AM Douglas Gourlay <douglas.gourlay@gmail.com> wrote:
 To: Tahoe City Public Utilities District Board of Directors
 bcc: Counsel and other Highlands Homeowners

I36-2

The attached document contains my comments and analysis of the proposed TXC lodge expansion. Please read this document at the board meeting for the TCPUD board. Alternatively, I am available to present this in person if that option is available.

Douglas Gourlay

Letter I36 Douglas Gourlay July 17, 2020

Response I36-1

The comment requests a statement from TCPUD Board members and Tahoe XC Board members that they have no conflicts of interest and should disclose if they live in proximity to transit corridors for Site A or Site D or have any commercial interest that would benefit from the Project. The comment would like to understand that the decisions made for the Project are not violating public trust. Such conflicts of interest described in the comment are not topics that require analysis in the EIR under CEQA; thus, no further response is required. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I36-2

The comment notes the document attached to this comment letter contains comments on the Project and would like them read at the July 17 public meeting. The attachment is letter I35; thus, see responses to comments I35-1 through I35-25. This comment letter was not read aloud during the public meeting because the author himself provided oral comments (see response to comments PM1-4 through PM1-9).

From: [David Gleske](#)
To: [Kim Boyd](#)
Subject: TXC draft EIR
Date: Friday, July 17, 2020 10:43:45 AM

Letter I37

As members of our North Shore community since 1972, my wife and I support the reconstruction of the Schilling Lodge at the TXC. This recreation facility has been a great asset to our community for many years and the new Lodge would be a great improvement.
 Thanks for considering our comments.

|
 I37-1
 |

Kay and Dave Gleske
 Agate Bay Full Time Residents

Sent from my iPhone

Letter I37 Kay and Dave Gleske
 July 17, 2020

Response I37-1

The comment includes background information about the letter’s author and expresses support for the proposed Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

From: [Matt Homolka](#)
To: [Kim Boyd](#)
Subject: FW: Questions and comments regarding proposed TXC project DEIR
Date: Friday, July 17, 2020 11:22:21 AM

Letter I38

Matt Homolka, P.E.
 Assistant General Manager/District Engineer
 Tahoe City Public Utility District
 530.580.6042 Direct
 530.583.3796 Main Office ext. 342
 www.tcpud.org

-----Original Message-----

From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
 Sent: Thursday, July 16, 2020 4:48 PM
 To: Matt Homolka <mhomolka@tcpud.org>
 Subject: Re: Questions and comments regarding proposed TXC project DEIR

Do any members of the Board live in the Highlands?

I I38-1

Sent from my iPhone

> On Jul 16, 2020, at 3:45 PM, Matt Homolka <mhomolka@tcpud.org> wrote:

>

> Carol,

>

> Thank you for your comments. We have discussed your request with the Board president. Given the difficulties of our current situation, she has agreed to allow a staff member to read your email during the public comment portion of the subject item. A few things to note:

>

> * Your email will be read verbatim. However, emphasis added by formatting or attachments will not be provided.

> * Oral public comments are limited to 3 minutes. Staff will cease reading your comments when that limit is reached.

> * Oral public comments are limited to 1 per person. This will be your one oral public comment. Please do not attempt to augment them during the meeting.

> * Regardless, the entirety of your emailed comments will be treated as a written comment on the draft EIR for the Tahoe XC Lodge Replacement and Expansion Project and will be responded to completely in the Final EIR.

>

> Sincerely,

>

> Matt Homolka, P.E.

> Assistant General Manager/District Engineer Tahoe City Public Utility

> District

> 530.580.6042 Direct

> 530.583.3796 Main Office ext. 342

> www.tcpud.org

>

I38-2

>
>
> -----Original Message-----
> From: Carol Pollock [mailto:carol_pollock@sbcglobal.net]
> Sent: Tuesday, July 14, 2020 10:33 PM
> To: Terri Viehmann <tviehmann@tcpud.org>; Dan Wilkins
> <d.wilkins@tcpud.org>; Judy Friedman <jfriedman@tcpud.org>; John Pang
> <jpang@tcpud.org>; scottzumwalt@gmail.com; Gail Scoville
> <gscoville@tcpud.org>
> Cc: Sean Barclay <sbarclay@tcpud.org>; kboyd@tcpud.com; Matt Homolka
> <mhomolka@tcpud.org>
> Subject: Questions and comments regarding proposed TXC project DEIR
>
> Dear Board Members,
>
> I would appreciate it if the following questions and comments are read aloud and discussed during the upcoming Board meeting.
>
> 1. Does the DEIR consider the dangerous winter traffic conditions on Old Mill Road? We have provided comments and photos of winter accidents to the Board in January. Some photos are included again. Does the Board consider increasing winter traffic on Old Mill in the interests of public safety? Of either residents or visitors to the TXC? How can Appendix D conclude that the proposed site D wouldn't result in a significant traffic safety impact?
>
> 2. Is there a construction budget and operating budget for this project? What are the financial consequences of low snow years for TXC?
> What are the consequences of significant operating deficits?
>
> 3. What regulatory approvals are required for the construction and coverage of a large building and significant paving of meadow and forest and tree removal? Have they been sought?
>
> Thank you,
>
> Carol Pollock
> 405 Old Mill Road
>
>
>
>

Letter I38 Carol Pollock

July 17, 2020

Response I38-1

The comment asks if any of the Board members live in the Highlands neighborhood. The comment does not raise environmental issues or concerns that require analysis in the EIR under CEQA; thus, no further response is required. This comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I38-2

The comment includes correspondence related to providing oral comments at the July 17 public meeting. The comment includes the same comments included in letter I32. See responses to comments I32-1 through I32-5.

From: [bonnie dodge](#)
To: [Kim Boyd](#); [Craig Dodge](#); [huffmtrtry@aol.com](#); [Becca Dodge](#)
Subject: Schilling Lodge Draft EIR/Public comments
Date: Friday, July 17, 2020 1:12:37 PM

Letter 139

Dear Kim,

I regret that I was unable to draft this letter before your meeting this morning. It has been an interesting and complicated spring/summer because of the Covid 19 crisis still affecting all of us. First major comment...what an incredible amount of work has been done to address our community's need for an improved and enlarged cross country ski lodge. I am impressed by the level and depth of analysis put into each and every alternative. Thank you.

I39-1

I am a homeowner on Polaris Drive, just at the dip before reaching the High School. This is the location the highest speed attained by most vehicles going to and coming from the High School. I'd like to say that it's mostly kids doing the speeding, but it's not. I have personally been nearly hit on my bicycle several times by motorists simply not paying attention, and have witnessed other close calls involving both pedestrians (usually students walking to and from school) and other cyclists. My own dog was hit by a student returning from a basketball game in January and I have seen 2 other animals hit on Polaris Road. Traffic on Polaris is a much bigger issue than on both Village and Country Club because of the location of the High School/Middle School and the fact that all students/faculty MUST use Polaris to access the schools. My gut feeling is that no amount of attempted mitigation is going to be enough. Traffic is going to increase and the results will be greater numbers of accidents involving students, residents and residents' furry friends. Likewise, when you add a venue for major events, you will also increase traffic flow to an already congested area. Believe me, we feel it whenever there is a ballet, a concert, a game of any sort held at the High School. Now you are proposing the addition of another venue with added events, all of which will add to the already heavy traffic. In addition, you will be adding non-resident drivers, often in a hurry to "have fun" and not used to driving residential streets in winter conditions.

I39-2

Then there is the issue of the safety of the students and the recreational participants in the event of an emergency...you name it, fire, flood, chemical spill, whatever. Having only one 2-lane residential road to evacuate will be a nightmare that I don't want to live. My guess is that not too far down the road, if this project at the site on Polaris goes through, there will be a community demand for another road exiting the High School.

I39-3

That road will either have to go through more of our beloved forest in our backyard, or connect down through Burton Creek...more trees downed, more negative environmental impact.

It's also clear in the EIR that the environmental impacts are most potentially severe at the Polaris site. It makes much more sense to expand the existing site which would allow for the least disruption of mama nature; fewer downed trees, less earth moved, fewer disturbed plant species, fewer disturbed animal species and quite frankly, fewer disturbed residents. The residents of the Highlands are used to the traffic flow created by the Nordic Center at its current location. The added parking will definitely improve the street parking situation for residents on Country Club and Highlands Drive. The traffic situation should not change radically. Because you have determined that this site would also meet your stated goals, it seems like a no-brainer to improve what you have and decrease the odds of all the stated potential environmental impacts.

I39-4

When it comes to the mitigation measures, I am impressed by the stated measures to which you will try to hold contractors and users accountable. However, my life's experience has

I39-5

taught me that contractors will often cut corners in hopes that they can increase profit. It's only IF they get caught that there are consequences and by then the damage is DONE. They will pay their fines and move on. Likewise, users will stick to their habits. In other words, people who are inclined to use public transportation or carpools will, and others (because they prefer convenience!!) will not.

I39-5
cont.

The noise issue is also significant. Even if they stick to 8am to 6:30pm, (again, that's not my experience) we will have 4 years of noise pollution at a high level. Again, if the work is done at the existing site, at least it will be much less significant than uprooting roughly double the untouched forest.

Then there is the noise created by just having a recreational facility right next to 2 schools. We already hear football games, baseball, lacrosse...you name it. A new recreational facility in essentially the same spot is going to significantly increase our exposure to noise created by major events. It seems wise to spread that kind of impact around, rather than focusing it all in one spot.

I39-6

Finally, I am a cross country skier. I know that the existing facility is too small and does not afford enough parking. The Schilling Lodge will make an attractive and much more efficient facility for both locals and visitors. Change is necessary.

Still, I do not believe that moving the current location of the Nordic Center is at all justified. Please try to implement change without increasing the danger to students, faculty, residents and recreational visitors. Modernizing, improving and increasing the size of the existing facility will protect so much more of our existing wildlife, plant species and forest. I implore you to abandon the Polaris site in favor of its current location on Country Club.

I39-7

Thank you for your time and consideration,

Bonnie M Dodge
3045 Polaris Rd.
530-363-0589

Letter I39 Bonnie Dodge

July 17, 2020

Response I39-1

The comment provides introductory comments to the letter. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Response I39-2

The commenter notes that they are a homeowner along Polaris Road and that speeding along this road is an issue and that they have nearly been hit on their bicycle several times by motorists simply not paying attention, and have witnessed other close calls involving both pedestrians and other cyclists. The commenter also notes that their dog was hit by a student returning from a basketball game in January and that they have seen two other animals hit on Polaris Road. The comment states that traffic on Polaris Road is a much bigger issue than on both Village Road and Country Club Drive because of the location of the High School/Middle School and the fact that all students/faculty must use Polaris Road to access the schools, and that no amount of attempted mitigation is going to be enough. The comment goes on to state that traffic is going to increase, and the results will be greater numbers of accidents involving students, residents, and residents' animals. Additionally, the comment states that the addition of a venue for major events will increase traffic in an already congested area and the non-resident drivers accessing the proposed Project will be in a hurry to "have fun" and not used to driving residential streets in winter conditions.

In relation to speeding and pedestrian safety, please see Master Response 1: Transportation Safety. The comment does not provide any data or evidence to contradict the conclusions of the transportation analysis related to roadway safety in the Draft EIR or provide specific evidence that the traffic safety analysis in the Draft EIR is inadequate, inaccurate, or incomplete. Therefore, no further response is necessary.

Regarding the concerns noted in the comment related to congestion and traffic associated with implementation of the proposed Project, Impact 3.5-1 and Impact 3.5-2 in Section 3.5, "Transportation," of the Draft EIR analyze the potential effects of Project-generated traffic within the study area. Additionally, the comment provides no evidence to support the claim that Polaris Road is currently congested. Finally, the comment provides no evidence that the drivers accessing the proposed Project would be predisposed to speed and would not be used to driving in winter conditions. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-3

The comment expresses concern related to the safety of the students and recreational participants in the event of an emergency (e.g., fire, flood, chemical spill, etc.) and having only a two-lane road for access. The comment also believes that in the future there will be a desire for an additional road exiting the high school, which could have environmental effects. See responses to comments A3-2, I10-6, and I10-7, which address concerns related to the use of hazardous materials as part of the Project. See response to comments I10-6 and I10-8, which address concerns related to wildfire risk. See response to comment I10-7, which addresses concerns related to emergency evacuation. As stated on page 3.10-1 in Section 3.10, "Hydrology and Water Quality," in the Draft EIR, "[t]he proposed Project site and Alternative A site do not contain stream or water bodies and are not in the 100-year flood hazard zone for any stream or water body." The comment's thoughts related to desire for a future road are not related to the Project. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-4

The comment expresses support for Alternative A and notes the EIR identifies the environmental impacts at the Polaris site are more severe than those from Alternative A. The comment asserts some of the benefits of Alternative A compared to the proposed Project would include fewer trees removed, less earth moved, fewer disturbed plant species, and no radical change to traffic. As discussed in Section 4.8, "Environmentally Superior Alternative," beginning on page 4-20 of the Draft EIR, the proposed Project is the environmentally superior alternative because it

would have fewer potentially significant impacts that would be reduced to a less-than-significant level with implementation of mitigation compared to Alternative A. The Site A alternatives would result in potential impacts to water supply that do not apply to the Site D alternatives. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-5

The comment expresses skepticism that mitigation measures required for the Project would be implemented. CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." An MMRP is required for the Project because the EIR identifies potential significant adverse impacts related to Project implementation, and mitigation measures have been identified to reduce those impacts. The MMRP is available under separate cover from this Final EIR. TCPUD is required to monitor completion of the mitigation measures identified for the Project and, where necessary, TCPUD, the Project applicant, or Project contractor would coordinate with other public agencies (e.g., Placer County, TRPA, Lahontan RWQCB) to demonstrate that mitigation requirements have been met to obtain and fulfill all necessary permit and approval requirements. Furthermore, this comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I39-6

The comment states that a new recreational facility is going to significantly increase noise exposure and that these impacts should be spread around rather than focusing is all in one spot. Impact 3.8-3 in Section 3.8, "Noise," of the Draft EIR discusses the nature of potential noise-generating activities at the proposed Schilling Lodge and associated noise levels, based on noise measurements conducted for similar types of events. Further, pages 3.8-17 and 3.8-18 of the Draft EIR evaluated these potential noise sources in comparison to adopted TRPA noise standards, and based on this analysis it was determined that future event noise would not exceed applicable noise standards for the area. It should be further noted, as discussed on page 3.8-2 of the Draft EIR, that noise sources that are of equal noise levels occurring in the same location, when combined, result in a 3-db noise increase, which is generally perceptible to humans. However, the Schilling Lodge under the proposed Project would be located approximately 140 feet from the existing sports track, and therefore, would not combine with noise from existing recreational facilities to result in an audible increase in noise.

Response I39-7

The comment expresses support for an expansion of the Existing Lodge at the current location. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

From: [Linda May](#)
To: [Kim Boyd](#)
Subject: TXCDraft EIR
Date: Friday, July 17, 2020 4:44:08 PM

Letter
I40

I want to add my support to the project for the Tahoe Cross country lodge replacement project. I live in the Highlands near the current cross country center. There is a little increased traffic, but nothing the is a nuisance. I actually enjoy listening to the occasional live music from my back yare.

I40-1

Linda May
3085 Highlands Ct.

Letter I40 Linda May
July 17, 2020

Response I40-1

The comment includes background information about the letter's author and expresses support for the proposed Project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

July 18, 2020

Subject: Tahoe XC DRAFT EIR

Letter
I41

Dear TCPUD Board Members,

Executive Summary. Draft reviews are typically used to identify areas requiring more attention and the following *Reviews Comments* do that; while *Requested Changes* and the *Recommended Approach* would make the project safer, less controversial and less likely to encounter costly litigation, and more consistent with both the Donor’s documented intentions and the Schilling family’s wishes, worthy goals that all parties ought to support.

Background. The Applicant’s www.theschillinglodge.com Web site states that when Mr. John Mozart donated the former Old Tahoe residence, he “made clear his intentions to honor the historical significance of the property,” and also that the Schilling family members did not want their old home “remodeled beyond recognition,” but rather used for enjoyment “by the larger Tahoe community.”

When the project was first presented to community members, the vast majority favored the Applicant’s proposal to replace the current 2,485 sq. ft. *Highlands Community Center* with the 4,607 sq. ft. historic Schilling lodge, plus modestly enlarged parking to accommodate the average number of vehicles on a typical winter day; but this was not one of the Alternatives considered in the DEIR.

I41-1

Since then, the project has: more than doubled in size, added a much larger parking area, a driveway, and a basement; proposed additional sites, included extensive interior alterations and additions designed for use by the applicant’s own members and commercial activities, and become a lot more controversial.

Controversial projects often exhibit **Red Flags**, and the most common and most frequently fatal ones include: impatience, neglecting to correct chronic problems, allowing ambitions to override common sense, and failing to change course and speed in time to avoid disaster. One famous example is the *Titanic* catastrophe, which could have been avoided if decision-makers had not ignored warnings.

Recommended Approach. The Proposed Project is currently at a key decision point, and can learn from such mistakes or risk repeating them. If the following *Comments* and *Requested Changes* are not properly addressed now, they will likely become even more problematic. To prevent this, we strongly recommend that the TCPUD Board:

SLOW DOWN

The DEIR contains 831 pages. Its Notice of Availability was issued on June 5th, and requests public review comments be submitted on or before 24 July. This is insufficient for most people to: access, properly review, and submit comments on

I41-2

such a document; and CEQA guidance lets Lead Agencies “use their discretion to extend such time periods to allow for additional public review and comment.” **Please extend the public review and discussion period by at least 30 days to prevent further credibility damage to this already controversial project.**

I41-2
cont.

CORRECT CHRONIC PROBLEMS

The DEIR inherited some confusing, incorrect, and/or misleading information that members of the community had asked to be fixed in earlier documents; and if not corrected now will continue to confuse readers and damage credibility.

1. Project Name (Multiple Occurrences) - This project has changed names at least twice, and the current one is both too long and misleading, because:
 - The actual structure out of which Tahoe Cross-Country (TXC) currently operates as a tenant activity is the *Highlands Community Center*, and
 - That current structure is neither replaced nor expanded as part of the Proposed Project.

Please consider a shorter and more appropriate Project Name.
2. Executive Summary - There is no such building as the “Highlands Park and Community Center.” **Please correct this to read “Highlands Community Center.”**
3. Introduction (Section 1) - There is no such thing as the “Highlands Park trail system.” **Please correct to use proper terms for trails in the Highlands.**
4. Project Description (Section 2.1) - **Please correct “Highlands Park and Community Center,” to read “Highlands Community Center.”**
5. Project Description (Section 2.3) - **Please correct “Highlands Park and Community Center” to read “Highlands Community Center” here also.**
6. Archeological & Historical (Impact 3.4-1) - “Highlands Park and Community Center” is *misleading*. **Please correct to read, “Highlands Community Center.”**
7. Archeological & Historical (Impact 3.4-1) - “Highlands Park Neighborhood” is *also invalid here*. **Please correct it to read, “Highlands neighborhood.”**
8. Noise (Impact 3.8-3) - To avoid additional confusion, if the term “Schilling Lodge” is used, **please also clarify:** (a) the difference between it and the “Schilling residence,” and (b) to which structural configuration it applies.
9. Hydrology (Impact 3.10-3) - **Please refer to Item 8 regarding use of the term “Shilling Lodge.”**

I41-3

- 10. Utilities (Impact 3.11-1) - Please refer to Item 8 regarding use of the term “Shilling Lodge.”
 - 11. Other CEQA (Multiple Occurrences) - Please refer to Item 8 regarding use of the term “Shilling Lodge.”
 - 12. Appendix B (Multiple Occurrences) - Please refer to Item 8 regarding use of the term “Shilling Lodge.”
 - 13. Appendix D (Transportation Analysis) - The Project Description segment contains yet another *incorrect and confusing name* (i.e., the TXC Project). **Please ensure all these inconsistencies are resolved in the next EIR.**
- CHANGE COURSE**
- Without a significant course change at this point, the proposed project faces the real possibility of encountering major obstacles and/or failure. It exhibits several of the **Red Flags** mentioned previously, and the *Requested Changes (in bold)* would strengthen the EIR, and put the project onto a safer, less controversial, and more beneficial course for a *much larger segment* of our community:
- 14. Executive Summary - There are public complaints that use of nebulous terms like “repurposes,” “reconstructed,” or “adaptive reuse” *attempt to disguise* the true scope of the massive internal modifications and external additions to the original historic structure. **Please replace them with less ambiguous and more appropriate terms, e.g., modified, expanded.**
 - 15. Introduction (Section 1) - Because the proposed internal modifications and additions to the original structure are specifically designed to accommodate the applicant’s own members and commercial activities, applying terms like “community uses” and “community needs” *are inappropriate and misleading*. **Please re-word this section to accurately describe that the proposed facility would be primarily designed for the applicant’s usage.**
 - 16. Project Description (Section 2.1) - Extensive internal changes and external additions to the original historic structure make repeated usage of terms like “adaptive reuse” and “preserve” seem *misleading and disingenuous*. **Please use more appropriate and less ambiguous terms, e.g. alter, add-to.**
 - 17. Project Description (Section 2.4) - **Please explain** how the proposed project would “preserve the financial responsibility and transparency of TCPUD’s property tax funds,” and how a facility designed around the applicant’s own membership/commercial functions qualifies as being for “community use”?
 - 18. Project Description (Section 2.5) - The last sentence implies this could be a privately-owned facility on publicly-owned land. **If that is the case, it will likely become a “show-stopper” for the proposed project.**

- 19. Project Description (Section 2.5.1) - Using terms like “adaptive reuse” seem misleading and disingenuous for reasons described above, massive internal changes and additions *don’t reasonably* qualify as “retaining the character defining features” of the original historic structure; and using terms like “public enjoyment” and “public area” *are inconsistent* with the fact that the proposed facility would be designed specifically for the applicant’s own use/operations. **Please re-word these sentences to more accurately describe the proposed project.**

I41-10
- 20. Project Description (Section 2.5.3) - **Please describe if/how** the applicant would reimburse Placer County and the TCPUD for any damages done to roads and/or infrastructure during construction of the Proposed Project.

I41-11
- 21. Project Description (Section 2.6.1) - There are concerns that the repeated usage of ambiguous and misleading terms like “adaptively reuses” for this massively modified structure *tries to hide* the actual scope of the project. **Please re-word to more accurately describe the proposed changes.**

I41-12
- 22. Project Description (Section 2.6.1) - There are also concerns that the first sentence in the paragraph following Table 2-5 implies the TCCSEA would have primary control over event bookings at both the new facility and the *Highlands Community Center*, and **this can be a another show-stopper.**

I41-13
- The strength of an EIR is driven by the validity of its *assertions and assumptions*, and the following items discuss specific areas of concern with ones in the DEIR:

I41-14
- 23. Environmental Impacts and Mitigation Measures (Section 3.2.1) - Assertion that a 10,000+ sq. ft. structure, a massive parking area, and the associated operations would have a “less than significant impact” upon the aesthetic qualities in The Highlands residential neighborhood *is not realistic.*”

I41-14
- 24. Environmental Impacts and Mitigation Measures (Section 3.2.3) - Assertions that cited references could mitigate the potential hazards created by locating hundreds of gallons of flammable fuels and other hazardous materials next to several schools with just one emergency response/evacuation route to a “less than significant level” *are not logical*, and CEQA *warns against* allowing hazardous materials within 1/4 mile of any school, let alone two. **Please delete such assertions.**

I41-15
- 25. Environmental Impacts and Mitigation Measures (Section 3.2.7) - Assertion that the impact of up to 100 more vehicles a day on a busy residential street and the only emergency response and evacuation route for several schools upon emergency response times would be “less than significant” *is illogical.* **Please delete that assertion.**

I41-16

- 26. Environmental Impacts and Mitigation Measures (Section 3.2.9) - Assertions that: (a) the new facility would not attract more visitors, (b) most would be locals, and (c) the increased number of activities and large events would not increase wildfire risks in a “Very High Fire Severity Zone are *questionable*, and questionable assumptions *should not be used* to mitigate safety risks. **Please support these with objective data (not assumptions) or delete.**

I41-17
- 27. Biological Resources (Section 3.3) - The assertion of “no sensitive habitats or biological communities such as wetlands, streams, SEZs, etc.” *is invalid* because the Proposed Project site actually drains into a seasonal stream that runs under Polaris into a SEZ and then Tahoe; and this Section also *neglects* to address “common” species of wildlife and plants affected by the project. **Please re-word this Section to reflect both of the above facts.**

I41-18
- 28. Biological Resource (Section 3.3.1) - Due to the seasonal stream mentioned above, the Proposed Project would require both Clean Water Act and TRPA permits; plus TRPA permits for tree removal. **Please include these facts.**

I41-19
- 29. Biological Resources (Impact 3.3-2) - The statement that construction of the Proposed Project would “require the removal of approximately 183 trees” *is inconsistent* with a subsequent one that says, “Habitat for common bird and mammal species does exist on the Proposed Project site, but the Proposed Project would not substantially affect common species.” **Please resolve it.**

I41-20
- 30. Biological Resources (Impact 3.3-4) - The assertions that “the proposed project is not expected to substantially affect” important wildlife movement corridors, and that “any potential impacts would be less than significant” *are incorrect because* bear, coyotes, and smaller mammals routinely transit the project area. **Please correct these assertions to reflect these facts.**

I41-21
- 31. Archeological & Historical (Section 3.4.1) - The assertion that the proposed project would qualify as a “Rehabilitation” under the Interior Secretary’s Standards *is invalid*, because the massive interior changes, 6,000+ sq. ft. of additions including a basement clearly do not “retain the structure’s historic character.” **Please delete this assertion.**

I41-22
- 32. Archeological & Historical (Cumulative Impacts) - The assertion that the proposed project would not considerably contribute to any significant cumulative impact on a historic resource *is not logical*, because the massive internal alterations and additions would drastically and permanently change the original historic Old Tahoe structure. **Please delete this assertion.**

I41-23
- 33. Transportation (Section 3.5) - The paragraphs regarding access to bicycle trails or transit stops *are irrelevant* to public concerns about the Proposed Project; and assertions that the increased traffic wouldn’t have significant

I41-24

- | | |
|--|---------------------------|
| <p>effect upon the area’s emergency response and evacuation <i>aren’t logical</i>.
 Please delete the latter assertions.</p> | <p> I41-24
cont.</p> |
| <p>34. <u>Transportation (Section 3.5.1)</u> - The regulatory guidance cited here may be interesting, but <i>common sense must prevail</i> regarding the effects increased traffic associated with the Proposed Project would have upon public safety; and <i>is much more credible</i> than the payment of “Mitigation Fees.”</p> | <p> I41-25</p> |
| <p>35. <u>Transportation (Section 3.5.2)</u> - The current descriptions of both Old Mill and Polaris Roads <i>are insufficient</i> because: (a) they would become main access and egress routes for the Proposed Project, and (b) they both include steep segments that often become quite icy and much more dangerous during the winter. Please re-word these descriptions to include this information.</p> | <p> I41-26</p> |
| <p>36. <u>Transportation (Section 3.5.2)</u> - The proximity of: bicycle paths, the Dollar Creek shared-use path, striped bicycle lanes on Hwy 28, and unpaved trails <i>are irrelevant</i> to documented public concerns about the increased car and bus traffic that the Proposed Project would have on the safety of residents, neighborhood students, and gym classes that routinely use Polaris Road. Please delete irrelevant information, and focus on the latter issues.</p> | <p> I41-27</p> |
| <p>37. <u>Transportation (Section 3.5.3)</u> - The assertion that “The Schilling Lodge is not expected to increase skier visitation to the site” is: <i>unsupported by objective analysis</i> and <i>inconsistent</i> with the increased size of the Proposed Project; and the 10 percent estimate <i>is a guess at best</i> in estimating impacts traffic would have upon public safety and the environment. Please support this assertion with objective data (not assumptions) or delete it.</p> | <p> I41-28</p> |
| <p>38. <u>Transportation (Section 3.5.3)</u> - TCPUD’s correspondence files reveal that multiple residents <i>specifically requested</i> that the DEIR properly address the safety risks the increased traffic associated with the Proposed Project would have on pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris between the schools and Heather Lane. Please specifically address this in future EIR versions.</p> | <p> I41-29</p> |
| <p>39. <u>Transportation (Section 3.5.3)</u> – The bases for the current assumptions in the Trip Generation paragraphs <i>are not provided</i>, and <i>much too subjective</i>. Such questionable assumptions <i>should not serve</i> as a basis for decisions about the impacts increased traffic associated with the Proposed Project would have on public safety, the environment, or The Highlands neighborhood. Please support these with objective data (not assumptions) or delete them.</p> | <p> I41-30</p> |
| <p>40. <u>Transportation (Section 3.5.3)</u> - The Existing Vehicle Speeds paragraph states that, “the majority of speeds recorded on Polaris Road are <i>above</i> the speed limit,” and it <i>is not logical</i> to assume addition of up to 100 more visitor</p> | <p> I41-31</p> |

- vehicles a day would decrease speed. **Please support this assertion with objective data (not assumptions) or delete it.**

I 41-31
cont.
- 41. Transportation (Impact 3.5-2) - Administrative guidelines may be attractive mitigation options, but whoever established the traffic volume threshold of 2,500 vehicles/day clearly wouldn't enjoy living on such a residential street, and wouldn't like their children on it either. **Common sense must prevail.**

I 41-32
- 42. Transportation (Impact 3.5-4) - In view of the challenges and complications related to drastically enlarging the parking area, why not base its size upon the *average* number of spaces required on an *average* winter/summer day?

I 41-33
- 43. Transportation (Impact 3.5-5) - This segment notes that construction of the Proposed Project could result in: lane/street closures, redirection of traffic, staging of heavy vehicles, etc. **This is not reasonable for a residential neighborhood like The Highlands that contains several schools.**

I 41-34
- 44. Transportation (Cumulative Impacts) - This segment **needs to address** the impacts that the Proposed Project's traffic would have upon the safety of pedestrians (e.g., neighborhood students) from up to 241 residential units in the *Dollar Creek Crossing* project, who would be walking on Polaris Road.

I 41-35
- 45. Air Quality (Section 3.6.1) - This Section indicates the project may be able to circumvent certain air quality standards with the *payment of Mitigation Fees*. **Mitigation fees are not credible ways to reduce public safety risks.**

I 41-36
- 46. Air Quality (Section 3.6.2) - The third to last sentence in the Sensitive Receptors paragraph *only mentions* North Tahoe Middle and High school students; and the last sentence *incorrectly states* that "there are no other sensitive receptors within the vicinity of the proposed project." West winds are quite common, so air pollution *would also affect* sensitive residents in much of The Highlands just east of the Proposed Project. **Please change these sentences to reflect the above fact regarding sensitive receptors.**

I 41-37
- 47. Air Quality (Impact 3.6-3) - Since some of the same assumptions regarding project traffic are applied here to support air quality impact assertions, the same cautions as in Item 39 above also apply. *Questionable assumptions* lead to *questionable decisions*. **Please support these with objective data (not assumptions) or delete them.**

I 41-38
- 48. Air Quality (Impact 3.6-4) - The same problem(s) exist here as in Item 46.

I 41-39
- 49. Air Quality (Cumulative Impacts) - The last two sentences in this segment pertain to the same concern mentioned in Item 45 above. **Do not do this.**

I 41-39

- 50. Green House Gases (Section 3.7.1) - **Please explain how** the TRPA’s requirement that limits idling time for heavy vehicle diesel engines to five minutes would allow the construction traffic staging anticipated in Item 43.

I41-40
- 51. Green House Gases (Section 3.7.3) - **Please update** the construction timetable in the second paragraph to reflect the current project status.

I41-41
- 52. Green House Gases (Mitigation Measure 3.7-1) - **Please review the measures listed, and limit the size** of the parking area to that needed for the *average* number of vehicles on an *average* operating day.

I41-42
- 53. Noise (Impact 3.8-4) - The assumptions regarding traffic increase *are too subjective* to be used to *estimate* the additional noise level when it is very close to the maximum threshold for schools and residential areas. **Please support these with objective data (not assumptions) or delete them.**

I41-43
- 54. Geology (Section 3.9.1) - Policy S-1.7 in the TRPA paragraph **also applies** since the Proposed Project would drain into a seasonal stream as noted.

I41-44
- 55. Geology (Section 3.9.2) - **Please change the last sentence** in the Local Geology paragraph to read, “The proposed project site drains to the south and east under Polaris Road and into a SEZ and Lake Tahoe.”

I41-45
- 56. Geology (Section 3.9.2) - Because the proposed project site drains into a seasonal Stream Environmental Zone (SEZ), **please re-assess** how this fact affects its classification discussed in the Land Capability paragraph.

I41-46
- 57. Geology (Impact 3.9-2) - **Please refer to Item 8 regarding use of the term “Shilling Lodge,” and re-assess** how excavation of the basement would endanger silting of the SEZ drainage mentioned above.

I41-46
- 58. Hydrology (Section 3.10) - The assertion that “The proposed project site does not contain stream or water bodies” may be technically correct, but it does drain into a SEZ that leads into Lake Tahoe. **Please re-word this assertion to reflect the above.**

I41-47
- 59. Utilities (Section 3.11.1) – Any Assertions that “No Mitigation Measures are required for Site D” are *incorrect*. NTFPD Code and TRPA Policy prohibit any development unless adequate water is “available for domestic use and fire prevention.” The TCPUD confirmed that the current system “was created during the reconstruction of the NTHMS in 2006,” and “that NTFPD was training in the area” that week; but the most important facts are: (a) On May 28th, alert residents had to use rakes and shovels to keep a brushfire from spreading to nearby trees behind homes on Polaris, and (b) If the fire had spread on a “normal school day” that area’s only emergency response and evacuation route would have quickly become clogged up with firefighting equipment and other vehicles. **This is another show-stopper for Site D.**

I41-48

- 60. Utilities (Section 3.11.3) - In view of Item 59, *estimating water needs* for a facility that is more than twice as large and on the same supply line as two schools based on usage by the existing structure *is unreasonable*. **Please support this with objective data (not assumptions) or delete it.**

I41-49
- 61. Utilities (Mitigation Measure 3.11-1) - In view of Items 59, **please include Mitigation Measures for both the Proposed and the Reduced Projects.**

I41-50
- 62. Utilities (Cumulative Impacts) - Due to Items 59-61, **please change the last sentence** to read, “there could be significant cumulative impact upon water supply, water supply infrastructure, and fire evacuation route safety for both the Proposed Project and the Reduced Project at Site D.”

I41-51
- 63. Alternatives (Section 4.1.1) - **Please include the following Alternative** as multiple community members formally requested, that addresses the Project Objectives listed in both this section and Executive Summary and reduces or eliminates impacts in multiple areas of concern covered by this DEIR:

“1. Replace the 2,465 sq. ft. Highlands Community Center with the original 4,607 sq. ft., two story, historic Schilling Lodge; as favored by the vast majority of residents in 2014, and as consistent with both the Donor’s and the Schilling Family’s stated wishes;

2. Only allow minimal, internal, modifications required not just to meet essential needs of the Applicant; but also for larger Community enjoyment as the Donor and Family intended;

3. Make the parking area less obtrusive by limiting its additions to those needed to minimize on-street parking on an average winter day, and using the smaller 2,814 sq. ft. surface footprint of the original Schilling Lodge; and

4. Transfer its final ownership to the TCPUD to avoid problems associated with putting a privately-owned facility on publicly-owned land, and allowing it to be shared by “the larger Tahoe Community” as the Donor has stated.”

I41-52
- 64. Alternatives (Section 4.8.5) - Because of the number of inconsistent terms, questionable assertions, and unsubstantiated assumptions about Traffic, Air Quality, Noise, and Water Supply in this Draft, the conclusion stated here that “the proposed project would be the environment superior alternative” is *both inappropriate and unjustified*. **Please delete it.**

I41-53
- 65. Other CEQA (Section 5.1.3) - The assertion that “the number of attendees at the large special event would not be greater than those that occur under existing conditions” *is not substantiated*. **Please support this statement with objective data (not assumptions) or delete it.**

I41-54
- 66. Other CEQA (Section 5.4) - Due to the inconsistent terms, questionable claims, and unsubstantiated assumptions in this Draft; the last sentence stating that “the proposed project and Alternative A would not result in

I41-54

- significant and unavoidable impacts” *is both inappropriate and unjustified.*
Please delete that sentence. | I41-54
 cont.
67. Appendix B (Management Policies) - The use of phrases like “community gathering space,” “a community gathering amenity,” and “an asset for the entire community” are *misleading and inappropriate* because the proposed interior modifications and external additions are all specifically designed for use by the applicant’s members and commercial activities. **Please re-word these sentences to more appropriately describe that the proposed facility would be primarily designed for the applicant’s use.** | I41-55
68. Appendix B (Management Policies) - Item 11 says that, “the Café will not *sell* alcohol,” but it does not address if alcohol will be *allowed* on the premises next door to two schools. **Please clarify this public concern.** | I41-56
69. Appendix D (Transportation Analysis) - The Existing Roadways segment says that the western portion of Polaris Road “carries approximately 1,400 daily one-way vehicle trips on a school day.” Since most of those vehicles return on the same day, the additional traffic to/from the Proposed Project *would cause the total to exceed the 2,500 vehicles per day threshold* for residential streets described in Impact 3.5-2 and discussed in Item 41. **Please re-assess this data.** | I41-57
70. Appendix D (Transportation Analysis) - In the third bullet under the Winter Trip Generation for the Proposed New Lodge Site, **please explain why** the analysis *assumes* the “gathering event is assumed to arrive/start during the PM peak hours” versus the AM peak hour on a school day? | I41-58
71. Appendix D (Transportation Analysis) - The third bullet under the Future Cumulative Conditions segment *needs to describe* that the Dollar Creek Crossing project would likely add a significant number of neighborhood student pedestrians on Polaris Road who would be endangered by the increased traffic. **Please re-word the item to include this information.** | I41-59
72. Appendix D (Transportation Analysis) - Figure 11 reveals that the vast majority of the time, on-site parking can be accommodated with a much smaller area than in the Proposed Project. **Why not design to this?** | I41-60
73. Appendix D (Transportation Analysis) - Residents know that most of the crashes on Old Mill and Polaris are not reported or reflected in Tables 15-17, because many only involve property damage. This Section *also needs to emphasize* that both these streets include steeper segments that become dangerously icy in the winter. **Please revise to include this information.** | I41-61
74. Appendix D (Transportation Analysis) - *During what specific time periods and for how long* were the Speed Survey data in Table 18 collected? | I41-62

75. Appendix D (Transportation Analysis) - *During what time periods and for how long* were the Bicycle/Pedestrian Count data in Table 19 collected? I41-63

76. Appendix D (Transportation Analysis) - Transportation Safety Impacts must be considered as *contributing elements of a larger issue*. The combination of: adding up to a 100 vehicles, speeding, crashes upon steep and icy sections, pedestrians on a street without sidewalks and limited corner sight distances, and further congesting the only emergency response and evacuation route for two schools, make the conclusion stated here that “the proposed project on site D would not result in a significant transportation safety impact,” both *illogical and unsupportable*. **Please delete it.** I41-64

77. Appendix E (Air Quality & GHG Models) – This Appendix introduces another *confusing and invalid* name for this project. **Please change** “Tahoe Cross Country Ski Lodge” to whatever this project ends up being called. I41-65

78. Appendices E through G - The model outputs for Air Quality, GHG, Noise, and Energy used in these Appendices heavily depend upon *questionable* assumptions that *are much too subjective* to be credible bases for any decisions affecting public safety. **Please explain these limitations.** I41-66

Ascent has done a very impressive job of identifying administrative steps which may offer ways to mitigate certain concerns; but Common Sense cautions that:
“Just because one can do something doesn’t mean one should do it.” I41-67

Summary. The significant number of *questionable* claims and assumptions in the DEIR **do not support** the TCPUD’s stated *Project Objective* to “minimize effects upon the neighborhood” in the DEIR’s Executive Summary. **Please do not:** rush any Board decisions to avoid more restrictive environmental regulations, permit ambitions to overrule common sense, attempt to exploit guidance loopholes or mitigation fee payments to address safety risks, or disregard public requests to include other Alternatives. I41-68

On the other hand, **please do:** use these *Comments* and *Requested Changes* to strengthen the EIR, change course to one that makes this project: far safer, less controversial, and more consistent with the Donor’s intentions and the Schilling family’s wishes to “*preserve*” this Old Tahoe treasure for enjoyment of “*a larger segment* of our community”; and respect the amount of time effort members of the community have taken out of their busy lives to prepare and submit them.

If you have any questions, please email them to us at huffmnty@aol.com.

Very Sincerely,

Roger & Janet Huff

Letter I41 Roger and Janet Huff

July 18, 2020

Response I41-1

The comment provides an introduction to the comment letter with background related to the development of the Project and suggests the TCPUD Board consider the recommendations in the letter. The comment asserts the original proposal was half the size of the proposed Project and did not include more parking, a driveway, and alterations and additions designed for the applicant's members and commercial activities. The comment asserts that controversial projects exhibit red flags associated with impatience and neglecting to correct chronic problems among other issues. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-2

The comment requests more time for the public to review the Draft EIR and provide comments by at least 30 days. The comment's request for an extension to the public review period was not granted. See response to comment I4-1, which explains why the 50-day comment period was not extended. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR.

Response I41-3

The comment requests clarification and correction of a number of terms used throughout the Draft EIR, including Highlands Park and Community Center, Highlands Park Neighborhood, Schilling Lodge, Schilling residence, and TXC Project. See response to comment I25-3, which addresses the use of Highlands Park and Community Center. The term "Schilling residence" refers to the original historic building that would be reconstructed as the Schilling Lodge. See the first two paragraphs on page 2-1 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR. The comment is correct that Highlands Park residential neighborhood should be called Highlands neighborhood. Thus, Impact 3.4-1 in Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," is revised to make this clarification in this Final EIR. This change is presented below and in Chapter 2, "Revisions to the Draft EIR." The correction does not alter the conclusions with respect to the significance of any environmental impact.

Paragraph 3 on page 3.4-14 of the Draft EIR is revised to read as follows:

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

Although Appendix D, "Tahoe XC Lodge Project Transportation Analysis," uses the term "Tahoe XC Project," the description of the Project in this appendix is clear that it is the same project analyzed in the Draft EIR. The comment's assertion that this term and the others mentioned are incorrect and/or confusing does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR.

Response I41-4

The comment asserts that if the Project remains unchanged it would encounter major obstacles or failure. The comment asserts that the Project should incorporate the requested changes in the comment letter to result in a safer, less controversial and more beneficial course for a much larger segment of the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-5

The comment asserts that use of the terms "repurposed" or "adaptive reuse" in the Draft EIR attempts to hide the actual scope of the proposed internal changes and additions to the historic structure. The comment requests that more appropriate and less ambiguous terms be used. See response to comment I10-3, which addresses the use of these terms and provides a summary of how the Draft EIR does provide clarity regarding the scope of the changes to

the historic structure. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-6

The comment asserts that the use of the terms “community uses” and “community needs” are misleading since the Project is designed around TCCSEA’s membership and commercial activities. The comment requests that Chapter 1, “Introduction,” be reworded to address these concerns. See comment I10-4, which addresses how the Project would be used by the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-7

The comment notes that internal changes and external additions to the original historic structure use the terms “adaptive reuse” or “preserve” and requests that more appropriate and less ambiguous terms be used. See response to comment 3, which addresses the use of these terms and provides a summary of how the Draft EIR does provide clarity regarding the scope of the changes to the historic structure. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-8

The comment requests an explanation of how the Project would preserve the financial responsibility and transparency of TCPUD’s property tax funds and how a facility designed around the applicant’s own membership/commercial functions qualifies as being for “community use.” While the comment correctly cites one of the twelve Project objectives listed on pages 2-5 and 2-6 in Chapter 2, “Description of the Proposed Project and Alternative Evaluated in Detail,” in the Draft EIR, the financial aspect of the Project is not a topic that requires analysis in the EIR under CEQA. However, as noted on page 2-14 of the Draft EIR, “Special events staged from the Lodge would offer broad access to public recreation resources, help develop and foster community interactions, and help create a sustainable business model for continued public cross-country skiing operations and year round trailhead access.” See response to comment I10-4, which addresses how the Project would be used by the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-9

The comment refers to the last sentence under the second paragraph on page 2-7 in Chapter 2, “Description of the Proposed Project and Alternative Evaluated in Detail,” in the Draft EIR, which states, “Ownership of the Schilling Lodge and associated improvements has not been determined, but could be owned by TCCSEA with a land lease from TCPUD.” The comment asserts that if this statement is true it would be a showstopper for the proposed Project. See responses to comments I10-1 and I10-2, which address concerns related to ownership of the Schilling Lodge. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-10

The comment states that the terms “adaptive reuse,” “public enjoyment,” and “public area,” are misleading in Section 2.5.1 of Chapter 2, “Description of the Proposed Project and Alternative Evaluated in Detail,” of the Draft EIR. Please see response to comment I10-10 for a discussion of adaptive reuse and the retention of character defining features of the Schilling residence. It is unclear how the terms “public enjoyment” and “public area” are misleading because the proposed Project, as well as the Existing Lodge, are intended for public use. As discussed in Chapter 2 of the Draft EIR, the proposed Project would relocate the public functions and operations of the Tahoe XC from the Existing Lodge to the Schilling Lodge. These uses, as described on page 2-3, include Nordic skiing amenities

(including space for ticketing, rentals, retail, waxing skis, a café, and storage), the Strider Glider after school program and middle school and high school students, bike rentals and other trailhead services, the junior mountain bike program, Boy Scouts of America meeting space, Highlands Homeowners Association meeting space, and special events, such as the Lake Tahoe Mountain Bike Race and the Burton Creek Trail Run. Additionally, the Winter Discovery Center accommodates the Sierra Watershed Education Partnership's winter programs, which includes snow science and winter safety education for local students. The Schilling Lodge would also have space dedicated for public lockers, public showers, and have space dedicated for public meetings.

Response I41-11

The comment asks for a description of if or how the applicant would reimburse Placer County and TCPUD for any damages done to the roads and/or infrastructure during construction of the proposed Project. As discussed under Section 2.5.3, "Construction Schedule and Activities," on page 2-22 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR, standard construction equipment would be expected to be used and construction staging would occur on the proposed Project site. The comment does not provide any specific evidence that construction activities would damage public roads or infrastructure. This comment does not raise any issues related to CEQA or provide any specific evidence related to the adequacy, accuracy, or completeness of the EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-12

The comment asserts that use of the terms "repurposed" or "adaptive reuse" in the Draft EIR attempts to hide the actual scope of the proposed internal changes and additions to the historic structure. The comment requests that Section 2.6.1 be reworded to accurately describe the proposed changes. See response to comment I10-3, which addresses the use of these terms and provides a summary of how the Draft EIR does provide clarity regarding the scope of the changes to the historic structure. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-13

The comment refers to the text following Table 2-5 on page 2-24 in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," of the Draft EIR and expresses concern about TCCSEA having primary control over event bookings for both the new facility and the Highlands Community Center. See response to comment I10-2, which addresses concerns related to event bookings at the Schilling Lodge and Highlands Community Center. This comment does not raise any issues related to CEQA or provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-14

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

Response I41-15

The comment expresses the belief that administrative procedures could reduce the potential impacts of locating hundreds of gallons of flammable fuel and other hazardous materials beside two schools with one emergency response and evacuation route to a less-than-significant level is not logical. The comment asserts that CEQA warns against allowing hazardous materials within 0.25-mile from any school. The comment requests deletion of such assertions. See response to comment I10-6, which addresses concerns related to the impact analysis related to hazardous materials, schools, and evacuation routes. See response to comment I25-7, which clarifies the intentions in CEQA related to analyzing hazardous material impacts on schools. This comment does not provide any specific

evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-16

The comment disagrees that allowing 100 more vehicles per day onto the only emergency response and evacuation route for the schools would be a less-than-significant impact. The comment requests deletion of such assertions. See response to comment I10-7, which addresses concerns about the proposed Project's additional traffic and potential effects on emergency response and evacuation. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-17

The comment disagrees with the assumptions made in Section 3.2.9, "Wildfire," in the Draft EIR that the proposed facility would not attract more visitors, most visitors would be local, and the increased number of activities and large events would not increase wildfire risks. The comment inaccurately states that Section 3.2.9 states that the Project would not attract more visitors. See response to comment I10-8, which provides rationale for the wildfire impact conclusion and the assumptions made in the wildfire impact analysis. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-18

The comment takes issue with the statement, "the assertion of no sensitive habitats or biological communities such as wetlands, streams, SEZs, etc." in Section 3.3, "Biological Resources," of the Draft EIR and analysis of impacts on common species that could be affected by the Project. As described in Section 3.10, "Hydrology and Water Quality," the proposed Project site and Alternative A site do not contain stream or water bodies and are not in the 100-year flood hazard zone for any stream or water body. The Alternative A site is located approximately 700 feet south of the perennial Dollar Creek; Lake Forest Creek is an intermittent stream in the reach that passes approximately 200 feet to the east of the proposed Project site.

With respect to aquatic features outside but near the proposed Project site and Alternative A site, Impact 3.10-1 (Potential for Project Construction to Degrade Surface or Groundwater Quality) in Section 3.10 of the Draft EIR concluded that any potential Project-related effects on water quality would be minor and less than significant. All construction projects in the Tahoe region must meet requirements and regulations of TRPA, the Lahontan Regional Water Quality Control Board (Lahontan RWQCB), Placer County, and federal, other state, and local agencies. The TRPA Code restricts grading, excavation, and alteration of natural topography (TRPA Code Chapter 33). In addition, all construction projects located in California with greater than 1 acre of disturbance are required, by Lahontan RWQCB, to submit a National Pollutant Discharge Elimination System permit, which includes the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that includes site-specific construction site monitoring and reporting. Project SWPPPs are required to describe the site, construction activities, proposed erosion and sediment controls, means of waste disposal, maintenance requirements for temporary BMPs, and management controls unrelated to stormwater. Temporary BMPs to prevent erosion and protect water quality would be required during all site development activities, must be consistent with TRPA requirements, and would be required to ensure that runoff quality meets or surpasses TRPA, state, and federal water quality objectives and discharge limits.

Regarding species addressed in the Draft EIR, the significance criteria established for biological resources (page 3.3-13 of the Draft EIR) determined which species or groups of species were analyzed in the greatest detail. Although special-status species were the primary focus of analyzing Project effects on individual species, based on their sensitivity and in accordance with the significance criteria, common migratory birds and Project requirements to protect active nests were addressed in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," as referred to in Section 3.3, "Biological Resources;" and, common species generally are addressed in Impact 3.3-2 (Tree Removal),

Impact 3.3-3 (Potential Establishment and Spread of Invasive Plants), Impact 3.3-4 (Potential Degradation or Loss of Wildlife Movement Corridors), and Cumulative Impacts in Section 3.3 of the Draft EIR.

Response I41-19

The comment states that the proposed Project would require both CWA and TRPA permits due to the seasonal stream mentioned in comment I41-8, in addition to TRPA permits for tree removal. As described in Section 3.3.1, "Regulatory Setting," in Section 3.3, "Biological Resources," of the Draft EIR, Section 404 of the CWA (33 USC Section 1251 et seq.) requires a project applicant to obtain a permit before engaging in any activity that involves any discharge of dredged or fill material into waters of the United States, including wetlands. No wetlands or other waters of the United States subject to CWA jurisdiction are located on the proposed Project Site or the Alternative A site; and the Project is not expected to cause fill of waters of the United States or substantial degradation of water quality outside the sites, as discussed in response to comment I41-18. Regarding TRPA permits, as described in the Draft EIR, all construction projects in the Tahoe Basin, including the proposed Project and Alternative A, must meet requirements and regulations of TRPA, Lahontan RWQCB, Placer County, and federal, other state, and local agencies. Tree removal and project requirements to obtain appropriate permits are described in detail in Section 3.3.1, "Regulatory Setting," and Impact 3.3-2 (Tree Removal) of the Draft EIR. The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I41-20

The comment states that Project-related tree removal described in Impact 3.3-2 (Tree Removal) is inconsistent with the conclusion that the proposed Project would not substantially affect common species. Whether tree or other vegetation removal would cause a substantial effect on common species depends on the magnitude and intensity of the disturbance, quality of habitat affected, the sensitivity of a species population to the disturbance, and other factors. The rationale for why the magnitude and type of tree removal proposed would not substantially affect a common species is described in Impact 3.3-2. The trees and stands in the proposed Project and Alternative A sites are not considered critical or limiting to the presence or viability of common or sensitive biological resources in the region. Additionally, tree removal or other vegetation disturbances would not substantially reduce the size, continuity, or integrity of any common vegetation community or habitat type or interrupt the natural processes that support common vegetation communities on the proposed Project site. The proposed Project would also not substantially change the structure or composition of forest habitat in the proposed Project vicinity. The comment offers no specific information or evidence that the analysis presented in the EIR is inadequate; therefore, no further response can be provided.

Response I41-21

The comment expresses disagreement with the conclusion in Impact 3.3-4 of the Draft EIR that the proposed Project is not expected to substantially affect important wildlife movement corridors, and references common species such as black bear and coyote. See response to comment I10-9.

Response I41-22

The comment believes that the proposed Project should not be considered "Rehabilitation." Please see response to comment I10-10 for a discussion of "Rehabilitation" as defined by the Secretary of the Interior's Standards.

Response I41-23

The comment states that the proposed Project would result in a significant cumulative impact to historic resources. The ten Standards for Rehabilitation, as listed on page 3.4-3 of the Draft EIR, include that, "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." As detailed on page 3.4-15 of the Draft EIR, the addition would be required to comply with the requirements of the Secretary of Interior's Standards, as acknowledged in the "Adaptive Reuse of the Schilling Residence" section in Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail." The addition would not destroy historic materials that characterize the property, would be differentiated from the original building yet compatible with the original building's design. For

these reasons, the addition to the Schilling residence as part of the proposed Project would not substantially alter the historic character of the Schilling residence and therefore would not contribute to a cumulative impact.

Response I41-24

The comment states that the paragraphs regarding access to bicycle trails or transit stops are irrelevant to public concerns about the proposed Project. Additionally, the comment takes issue with the conclusions related to emergency response and evacuation.

The comments related to access to bicycle trails and transit stops does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary.

As detailed on page 3.5-1 of Section 3.5, "Transportation," in the Draft EIR, the potential for the Project to interfere with implementation of an adopted emergency response plan or emergency evacuation plan is discussed in Section 3.2.3, "Hazards and Hazardous Materials." Additionally, the comment does not provide any evidence or data to support the claim that the analysis of the proposed Project's effect on emergency response and evacuation is inadequate. See also response to comment I10-7. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-25

The comment takes issue with the Draft EIR's conclusions regarding the effects of increased traffic associated with the proposed Project on public safety. No specific comments are provided on the contents of the Draft EIR and no information is provided that would alter or change the Draft EIR analysis; and thus, further response is not possible. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-26

The comment states that the current descriptions of both Old Mill Road and Polaris Road are insufficient because they would become main access and egress routes for the proposed Project, and they both include steep segments that often become quite icy and much more dangerous during the winter. The comment requests that these descriptions be re-worded to include this information.

Please see Master Response 1: Transportation Safety. The description of local roads on page 3.5-8 in Section 3.5, "Transportation," of the Draft EIR are brief descriptions based on existing roadway geometrics, site access, and roadway classifications. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-27

The comment states that the proximity of bicycle paths, the Dollar Creek shared-use path, striped bicycle lanes on SR 28, and unpaved trails are irrelevant to documented public concerns about the increased car and bus traffic that the proposed Project would have on the safety of residents, neighborhood students, and gym classes that routinely use Polaris Road. The comment states that this information should be deleted, and the focus of the analysis should be on roadway safety along Polaris Road. The comment does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary.

Response I41-28

The comment states that the assertion within the Draft EIR that the Schilling Lodge is not expected to increase skier visitation to the site is unsupported by objective analysis and inconsistent with the increased size of the proposed Project. Additionally, the comment states that the 10 percent estimate is a guess at best in estimating impacts traffic would have upon public safety and the environment. The comment concludes that this assertion should be supported with objective data or deleted.

As stated on page 3.5-12 of the Draft EIR, trip generation at a ski area or trailhead is typically a function of the skiable terrain, snow conditions, and skier capacity rather than lodge amenities. Therefore, because the proposed Project would not alter the terrain or skier capacity, the number of skiers expected to visit the site is expected to be the same as the number that currently travel to the Existing Lodge. Additionally, it is stated on page 3.5-12 of the Draft EIR that while

additional visitation is not expected for the aforementioned reasons, the analysis takes a conservative approach and assumes skier visitation during winter conditions would increase by 10 percent. Therefore, as described above, the analysis of transportation impacts in the Draft EIR is not only adequate, it is conservative based on substantial evidence, including data collected and modeled for a typical busy day at Tahoe XC. The comment provides no evidence in support of the statement that the increase in skier visitation (10 percent) is inaccurate and not supported by data. See response to comment O1-4, which also addresses concerns related to the estimated increase in visitation associated with the Project. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-29

The comment states that TCPUD's correspondence files reveal that multiple residents specifically requested that the Draft EIR properly address the safety risks associated with Project-generated traffic increases on pedestrians (i.e., residents, neighborhood students, gym classes) that routinely use the segment of Polaris Road between the schools and Heather Lane. The comment concludes by requesting that future versions of the EIR address this issue.

Please see Master Response 1: Transportation Safety. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-30

The comment states that the basis for the current trip generation assumptions are not provided and too subjective. The comment adds that such questionable assumptions should not serve as a basis for decisions about the impacts increased traffic associated with the proposed Project would have on public safety, the environment, or the Highlands neighborhood. The comment concludes by stating that the trip generation assumptions should be supported with objective data or deleted.

Please see response to comment I41-28. Additionally, the "Methods and Assumptions" section starting on page 3.5-12 of Section 3.5, "Transportation," in the Draft EIR provides a detailed reasoning and justification for the trip generation rates used to analyze the transportation impacts of the proposed Project. Finally, the comment does not provide any evidence that trip generation applied to the Project is insufficient. No changes to the Draft EIR are required.

Response I41-31

The comment alleges that the majority of the speeds recorded on Polaris Road are above the posted speed limit and it is not logical to assume the addition of up to 100 more visitor vehicles a day would decrease speed.

Although the majority of speeds recorded on Polaris Road were above the speed limit, they were typically within 5 mph of the speed limit and below the design speed of 35 mph. Additionally, the comment is incorrect in the assertion that the analysis assumes Project-generated traffic would decrease speed. Please see Master Response 1: Transportation Safety, for details related to speeding. Additionally, the comment incorrectly asserts that Section 3.5, "Transportation," in the Draft EIR states that speeds would decrease with the addition of Project-generated trips. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-32

The comment states that administrative guidelines may be attractive mitigation options, but whoever established the traffic volume threshold of 2,500 vehicles/day clearly would not enjoy living on such a residential street and would not like their children on it either.

The comment pertains to an established Placer County standard. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-33

The comment questions the basis for the size of the proposed parking area. The comment poses a question and does not raise any CEQA issues or address the adequacy of the EIR analysis. See response to comment O1-3 regarding parking demand. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-34

Please see response to comment I10-12, which addresses a similar comment related to lane/street closures, redirection of traffic, staging of heavy vehicles, etc. in a residential neighborhood like the Highlands neighborhood.

Response I41-35

The comments states that the cumulative transportation analysis needs to consider the Dollar Creek Crossing project when evaluating pedestrian safety on Polaris Road.

As detailed on pages 3.5-31 and 3.5-32 under the "Cumulative Impacts" section of Section 3.5, "Transportation," of the Draft EIR, the Dollar Creek Crossing project was included in the future cumulative background traffic volumes used in the cumulative transportation analysis.

Additionally, as detailed in Master Response 1, increasing traffic along a roadway lacking pedestrian or bicycle facilities does not necessarily constitute a safety impact under CEQA. The Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and did not identify any safety impacts. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-36

The comment questions the applicability of the air quality mitigation fees. See response to comment I10-13 for a discussion on how mitigation fees are addressed in the Draft EIR, the application of mitigation fees during environmental review in general, and the Project's regulatory requirements under TRPA Code. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-37

The comment asserts that the Draft EIR incorrectly identified sensitive receptors in Section 3.6, "Air Quality," and that due to wind patterns, air pollution would affect sensitive receptors in the Highlands neighborhood east of the Project. See response to comment I10-14 for a discussion of sensitive receptors and characteristics of air pollution. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-38

The comment questions the assumptions in the traffic study that informed the findings of the air quality analysis. See response to comment I10-15 for a discussion of the traffic study and TPCUD's discretionary role as lead agency for the Project. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-39

The comment states concern regarding the use of mitigation fees in the cumulative air quality discussion. See Response I10-13 for a discussion on how mitigation fees are addressed in the Draft EIR, the application of mitigation fees during environmental review in general, and the Project's regulatory requirements under TRPA's Code. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-40

The comment asks how TRPA's requirement to limit idling time for heavy-duty diesel engines to 5 minutes would allow for construction traffic staging. TRPA Code Section 65.1.8, Idling Restrictions, limits idling for certain diesel engines to no longer than 5 minutes in California. This is a regulatory requirement to which the Project will be beholden. The efficacy of TRPA Code Section 65.1.8, and other portions of the TRPA Code that relate to air quality, is monitored through a comprehensive multi-agency air quality program. The Project would be subject to the requirements of the TRPA Code and is assumed to restrict idling for diesel-fueled vehicles in accordance with

Section 65.1.8. No edits to the Draft EIR are required in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-41

The comment requests that the construction timetable in Section 3.7 of the Draft EIR be updated to reflect the current Project status. Page 3.7-13 summarizes the assumed construction schedule commencing in May 1, 2020 and ending in June 2023, which was the schedule that was known at the time the modeling was completed for the Draft EIR. The fourth paragraph on page 3.7-13 of the Draft EIR, excerpted below, explains the changes in construction duration between modeled estimates and the updated, reduced construction duration. Because the estimated timing for construction of the Project to begin has been delayed from originally anticipated in the Draft EIR, estimated construction timing referenced in Section 3.7, "Greenhouse Gas Emissions and Climate Change," is updated below and in Chapter 2, "Revisions to the Draft EIR," in this Final EIR.

The fourth paragraph 4 on page 3.7-13 of the Draft EIR is revised as follows:

[c]onsistent with Chapter 65 of the TRPA Code of Ordinances, construction of the Project was assumed to be limited to May 1 through October 15. Based on assumptions developed in the initial planning stages for the Project, construction was assumed to commence on May 1, 2020 and end in June 2023, when the Project would become operational. However, as described under Section 2.5.3, 'Construction Schedule and Activities,' Project construction activities may be completed faster, estimated to beginning in 2024~~2022~~ instead of 2020 and completed in 2 years rather than 4 years. Construction would be limited to Monday through Friday within exempt hours.

The current construction schedule, which would commence at a later date, would produce a similar, or arguably, lower level of GHG emissions as regulatory mechanisms that reduce emissions such as CARB's Advanced Clean Cars program and the Renewable Portfolio Standards' yearly renewable targets under Senate Bill 100 would reduce transportation and energy-related emissions. Therefore, the assumed construction schedule commencing in May 1, 2020 and ending in June 2023 provides a more conservative estimate of emissions, which are mitigated for by Mitigation Measure 3.7-1 beginning on page 3.7-17 of the Draft EIR. Impact 3.7-1, "Project-Generated Emissions of GHGs," is revised to reflect the conservative nature of the GHG emission modeling compared to the Project construction timeline that may actually occur as described herein.

The fourth paragraph on page 3.7-15 of the Draft EIR is revised to read as follows:

Proposed Project construction activities would result in the generation of GHG emissions. Heavy-duty off-road construction equipment, materials transport, and worker commute during construction of the Project would result in exhaust emissions of GHGs. There would be no construction associated with the Highlands Community Center. Table 3.7-4 summarizes the projected emissions associated with construction of the Project by year (2020-2023). As mentioned above under "Methods and Assumptions," and in Section 2.5.3, "Construction Schedule and Activities," the Project was initially anticipated to be constructed over an up to 4 year period and was anticipated to begin in 2020, which is reflected in Table 3.7-4 below. In the event that construction activities are completed faster than presented here, estimated to beginning in 2024~~2022~~ instead of 2020 and completed in as few as 2 years rather than 4 years, the GHG emissions shown in separate years in the table would be combined over fewer years. The emissions generated over a shorter timeframe would not change the impact conclusion provided below. Additionally, if construction activities begin at a later time than initially anticipated, potentially lower levels of GHG emissions would be generated as a result of compliance with regulatory mechanisms that reduce transportation and energy-related emissions such as CARB's Advanced Clean Cars program and the Renewable Portfolio Standards' yearly renewable targets under Senate Bill 100. See Appendix D for detailed input parameters and modeling results.

Response I41-42

The comment suggests Mitigation Measure 3.7-1 be updated to limit the size of the parking area to that based on the average number of vehicles on an average operating day. Page 3.7-18 of the Draft EIR addresses the use of parking restrictions as a feasible onsite mitigation measures and dismisses parking restrictions as infeasible to enforce due to

Project-specific variables “associated with spillover parking into nearby residential neighborhoods during peak seasonal periods.” Thus, Mitigation Measure 3.7-1 does not include parking restrictions as a method to reduce GHG emissions. For this reason, the measure has been reviewed and does not require edits in response to this comment. See also response to comment O1-3 regarding the parking analysis conducted for the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-43

The comment states that the assumptions used to conduct the traffic noise modeling are subjective and that objective data should be used. As described on page of 3.8-19 of the EIR a 10 percent increase in traffic was used to estimate traffic noise increases. This assumption is further explained on page 3.5-13 in Section 3.5, “Transportation,” and was used to provide a conservative worst-case scenario. It is unlikely that the proposed Project would result in this level of traffic, and associated noise increase; thus, using this conservative assumption to evaluate noise impacts, which were found to not exceed a standard, ensures that Project-generated traffic noise increases would be even less than what was reported in the EIR, and therefore, also not result in a substantial increase in traffic noise that would exceed any applicable standard. No further analysis is necessary.

Response I41-44

This comment notes that TRPA Policy S-1.7 is applicable to the Project. This comment is correct and this policy is listed on page 3.9-3 in the regulatory setting in Section 3.9, “Geology, Soils, Land Capability, and Coverage,” of the Draft EIR for that reason. No further analysis is necessary.

Response I41-45

This comment requests that the discussion of local geology state that the proposed Project site drains to a stream environment zone (SEZ) rather than describing the creek that the site drains toward. The comment also asks for a reassessment of SEZ effects related to the presence of an SEZ adjacent to Lake Forest Creek. There is value in clarifying that the SEZ areas found within the proposed Project site are associated with Lake Forest Creek; however, this addition would be better suited to the discussion of “Land Capability and Coverage” beginning on page 3.9-8 of the Draft EIR rather than the “Local Geology” section. Additionally, the SEZ in question is included in the summary of land capability classification within the proposed Project site found on page 3.9-8 of the Draft EIR and clarifying its association with Lake Forest Creek does not result in a need for reassessment of SEZ effects. This Final EIR includes revisions to reflect this clarification. The change is presented below and in Chapter 2, “Revisions to the Draft EIR.” The addition of this information does not alter the conclusions with respect to the significance of any environmental impact.

In response, the third paragraph on page 3.9-8 of the Draft EIR is revised as follows:

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

Response I41-46

This comment asks that Impact 3.9-2 assess how the excavation of the basement for the Shilling Lodge would affect silt and sediment transport to the Lake Forest Creek SEZ. The potential for erosion and sediment transport is discussed in Impact 3.9-1 beginning on page 3.9-11 of the Draft EIR. As described therein, the proposed Project would comply with all TRPA and Lahontan RWQCB protections to control soil erosion and protect adjacent SEZ areas. No further response is required.

Response I41-47

This comment asks that the statement on page 3.10-1 of the Draft EIR, which notes that neither the proposed Project site nor the Alternative A site contain stream or water bodies, be modified to acknowledge that the sites drain to an SEZ that leads to Lake Tahoe. The statement in question relates specifically to water currents, stream volumes, or flood hazards. Therefore, including SEZ areas in this discussion would not be appropriate. The connectivity of the proposed Project site and the Alternative A site to local water bodies is described in Section 3.10.2, “Environmental Setting,” of the Draft EIR. No further response is required.

Response I41-48

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

Response I41-49

The comment questions the methodology used to estimate water demands of the proposed Project. See response to comment I10-17, which addresses concerns related to the water demand analysis in the Draft EIR. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR.

Response I41-50

The comment requests that in light of comments addressed in responses to comments I41-48 and I41-49, mitigation should be required for the proposed Project and the cumulative impact conclusion related to water demand impacts should be revised. For the reasons discussed in response to comment I10-17 that address the potential water demand impact of the proposed Project, there would not be a need to adopt mitigation for the proposed Project and there would not be a significant cumulative impact related to water supply associated with the proposed Project. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment.

Response I41-51

The comment suggests the Draft EIR analyze an alternative that considers no expansion to the Schilling Lodge building, minimal internal modifications, limiting the parking onsite while also minimizing on-street parking, and transferring ownership to TCPUD. See response to comment I10-18, which explains why the comment's suggested alternative is not considered for further analysis. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-52

The comment takes issues with the conclusions in Section 4.8.5, "Conclusion," in Chapter 4, "Alternatives." The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-53

The comment requests that the statement related to the number of attendees at large special events in Section 5.1.3, "Growth-Inducing Effects of the Project," be supported by data. Table 2-3 on page 2-13 and the "Premier Events and Large Special Events," section on page 2-14 of Chapter 2, "Description of the Proposed Project and Alternative Evaluated in Detail," in the Draft EIR identify and describe the maximum number of people that could attend large special events. Although there would be a small increase in the number of large special events throughout the year at the Schilling Lodge compared to the number that occur under existing conditions at the Highlands Community Center, it is assumed that the capacity of the "Other Large Special Events" would be limited by the number of parking spaces and average occupancy for each vehicle and assumes that under existing conditions, although the parking lot is smaller, event attendee parking overflows onto the nearby residential streets. For the "Premier Events," the anticipated maximum number that is assumed is based on previous attendance at existing "Premier Events" like the Great Ski Race. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-54

The comment disagrees with the statement in Section 5.4, "Significant and Unavoidable Adverse Impacts," on page 5-3 of the Draft EIR that the proposed Project and Alternative A would not result in significant and unavoidable impacts. The comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-55

The comment asserts that the use of the phrases "community gathering space," "community gathering amenity," and "asset for the entire community" in Appendix B, "Schilling Lodge Management Plan," are misleading since the Project is designed around TCCSEA's membership and commercial activities. See comment I10-4, which addresses how the Project would be used by the community. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-56

The comment requests clarification in Appendix B, "Schilling Lodge Management Plan," if alcohol would be permitted on the premises of the Schilling Lodge. See responses to comments I10-19 and I35-6, which address concerns related to the presence of alcohol at the Schilling Lodge. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. No changes are made to the Draft EIR in response to this comment. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-57

The comment states that the additional traffic to/from the proposed Project would cause the total daily traffic volume on Polaris Road to exceed the threshold for residential streets.

As stated on page 3.5-21 of Section 3.5, "Transportation," in the Draft EIR, neither the proposed Project nor Alternative A would result in an exceedance of Placer County's 2,500 vehicles per day standard for residential roadways. The average daily traffic (ADT) figures on this page include arrival and departure trips made on the same day. For instance, a vehicle going to the school and back would generate two daily one-way vehicle trips. As such, the additional traffic to/from the proposed Project would not cause the total to exceed the 2,500 vehicles per day threshold for residential streets. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-58

The comment questions why the winter trip generation analysis for the proposed Project assumes that gathering events start during the p.m. peak hours, versus the a.m. peak hour on a school day.

The gathering event at the proposed lodge is assumed to start during the p.m. peak hour to evaluate a "worst case scenario" in which event related traffic volumes are added to the p.m. peak-hour conditions, which are demonstrated to have greater traffic volumes in the area; thus, yielding a conservative intersection operations (level of service) analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-59

The comments the third bullet under the Future Cumulative Conditions segment in Appendix D (Transportation Analysis) of the Draft EIR be revised to describe that the Dollar Creek Crossing project would likely add neighborhood student pedestrians on Polaris Road that should be considered in the analysis.

As detailed in Master Response 1, increasing traffic along a roadway lacking pedestrian or bicycle facilities does not necessarily constitute a safety impact under CEQA. The Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR contains detailed analysis of the potential transportation safety impacts of the Project and did not identify any safety impacts. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-60

The comment states that Figure 11 in Appendix D (Transportation Analysis) of the Draft EIR reveals that the vast majority of the time, onsite parking can be accommodated with a much smaller area than in the proposed Project. The comment concludes by asking why the parking lot was not designed according to this lower parking demand.

As detailed on page 3.5-18 of the Draft EIR, the parking analysis evaluates the current demand of the Existing Lodge and determines the capacity needed at the Schilling Lodge. The parking demand analysis was developed to ensure that adequate onsite parking would be provided such that operation of the project would not result in visitors having to park on the surrounding residential streets. See response to comment O1-3 regarding the parking analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-61

The comment states that residents know that most of the crashes on Old Mill Road and Polaris Road are not reported or reflected in Tables 15-17 in Appendix D (Transportation Analysis) of the Draft EIR because many only involve property damage. The comment concludes that this section also needs to emphasize that both these streets include steeper segments that becomes dangerously icy in the winter and should be revised to reflect this information.

Please see Master Response 1: Transportation Safety. The comment does not provide any evidence to support the assertion that most of the collisions along Old Mill Road and Polaris Road are not reflected in Tables 15-17 in Appendix D of the Draft EIR. No further response is necessary.

Response I41-62

The comment asks during what periods and for how long the speed survey data was collected.

The footnote in Table 18 on page 59 of the Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR states that the speed surveys were conducted during periods with good road conditions (not snowy/icy or raining) from Tuesday March 26 through Wednesday April 3, 2019. Specifically, the data from March 26-27 and March 29-April 1 was used. Data from March 28 and April 2-3 was not used (as these days did not have good road conditions). The comment poses a question and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-63

The comment asks when and for how long the bicycle and pedestrian count data in Table 19 was collected. The footnote in Table 19 on page 62 of the Transportation Analysis prepared by LSC and included in Appendix D of the Draft EIR states that bicycle and pedestrian counts were conducted at three intersections along Polaris Road during the morning and afternoon peak periods of school-related traffic activity on Tuesday, September 11, 2018. Specifically, the counts were conducted from 7:00-9:00 a.m. and from 2:00-4:00 p.m. The comment poses a question and does not address the adequacy of the EIR analysis. No further response is necessary.

Response I41-64

The comment states that transportation safety impacts must be considered as contributing elements of a larger issue and questions the impact determination.

Please see Master Response 1: Transportation Safety. Additionally, as detailed on page 3.5-1 of Section 3.5, "Transportation," of the Draft EIR, the potential for the Project to interfere with implementation of an adopted emergency response plan or emergency evacuation plan is discussed in Section 3.2.3, "Hazards and Hazardous Materials."

The comment does not provide any data or evidence to contradict the conclusions of the transportation safety analysis or analysis of effects on emergency response and evacuation in the Draft EIR. Therefore, no further response is necessary. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-65

The comment refers to the use of the term "Tahoe Cross Country Ski Lodge" in Appendix E, "Air Quality and Greenhouse Gas Emissions Modeling Outputs," in the Draft EIR and requests the term be revised. Although Appendix E in the Draft EIR uses the term "Tahoe Cross Country Ski Lodge Site D," the modeling provided in this appendix was based on the characteristics of the proposed Project described in Chapter 2 of the Draft EIR. The comment's assertion that this term is confusing or invalid is not evidence related to the adequacy, accuracy, or completeness of the Draft EIR.

Response I41-66

The comment asserts that the modeling outputs for Appendix E through G (air quality, GHG, noise, and energy) in the Draft EIR depend upon questionable assumptions that are subjective. The comment is general in nature, does not question any specific assumptions, and does not offer alternative assumptions to be considered.

Appendix E includes the air quality and GHG modeling outputs that informed the significance determinations for the Project. Emissions of criteria air pollutants and GHG emissions were modeled using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 as recommended by PCAPCD and other air districts throughout the state. Modeling inputs were derived from Project-specific characteristics (e.g., anticipated vehicle generation, acres to be graded) where available, and CalEEMod default values were used where Project-specific information was unavailable. The comment does not raise any specific issue with the modeling contained in Appendix E, but rather provides general dissatisfaction with "limitations" associated with Appendix E. Without any specific information provided in the comment to respond to, a detailed response cannot be provided beyond what was summarized on pages 3.6-11, 3.6-12, and 3.7-13 of the Draft EIR.

Appendix F includes noise modeling inputs and outputs that informed the significance determinations for the Project. Specifically, construction noise and vibration levels, long-term increases in traffic noise, and noise associated with outdoor activities were modeled. Project-generated construction source noise and vibration levels were determined based on methodologies, reference emission levels, and usage factors from Federal Transit Administration (FTA), Federal Highway Administration (FHWA), and Caltrans. Reference levels for noise and vibration emissions for specific equipment or activity types are well documented and the usage thereof common practice in the field of acoustics. With respect to non-transportation noise sources (e.g., stationary) associated with Project implementation, the assessment of long-term (operational-related) impacts was based on reconnaissance data, reference noise emission levels, and measured noise levels for activities associated with Project operation (e.g., outdoor events, amplified sound), and standard attenuation rates and modeling techniques. Reference noise levels and measurements conducted are referenced and included in the appendix. To assess potential long-term (operation-related) noise impacts resulting from Project-generated increases in traffic, noise levels were estimated using calculations consistent with the FHWA's Traffic Noise Model Version 2.5 and Project-specific traffic data, which was included in Appendix C. Traffic noise model inputs included reference noise emission levels for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and ground attenuation factors, which were determined based on site-specific parameters such as speed limits on modeled roads. All calculations and noise propagation methods are well documented in the appendix and are consistent with methods recommended by FTA, FHWA, and Caltrans. Without any specific information provided in the comment to respond to, a detailed response cannot be provided beyond what was summarized on page 3.8-13 of the Draft EIR.

Appendix G summarizes the calculations that were performed to estimate the anticipated gasoline and diesel-fuel consumption during Project construction and operation, and electricity and natural gas combustion at full buildout. Construction-related fuel consumption was calculated for CalEEMod default heavy-duty construction equipment based on anticipated hourly daily usage, the number of days used, and worker commute trip VMT. Yearly operational consumption of electricity and natural gas were determined by the default CalEEMod energy consumption values for the Project's land uses. Operational diesel and gasoline consumption was calculated using CARB's 2014 Emissions FACTor (EMFAC) model (CARB 2014) and annual proposed Project- and Alternative A-generated VMT. Where Project-specific information was not known, CalEEMod default values based on the Project's location were used. The comment does not raise any specific issue with the modeling contained in Appendix F, but rather provides general dissatisfaction

with "limitations" associated with Appendix F. Without any specific information provided in the comment to respond to, a detailed response cannot be provided beyond what was summarized on page 3.12-6 of the Draft EIR.

No edits to the Draft EIR are required in response to this comment. The comment is noted.

Response I41-67

The comment states that an impressive job has been done by Ascent identifying administrative steps that may offer ways to mitigate some Project concerns, but common sense cautions that just because someone can do something does not mean one should do it. This comment does not provide any specific evidence related to the adequacy, accuracy, or completeness of the Draft EIR. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.

Response I41-68

The comment provides closing remarks to the comment letter and summarizes general comments provided earlier in the letter. See responses to the comments provided above. The comment is noted for consideration by the TCPUD Board during the review of the merits of the Project.