# 2 REVISIONS TO THE DRAFT EIR

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

## 2.1 CORRECTIONS AND REVISIONS TO THE DRAFT EIR

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

### 2.1.1 Revisions to the Executive Summary

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

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

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

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

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

| Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|---|---|---|---|
| NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable | | | |
| **Impact 3.5-6: Result in an Unmitigated Increase in Daily VMT**<br>The proposed Project and Alternative A would both result in increases in daily VMT. Therefore, implementation of the proposed Project or Alternative A would result in a VMT impact, which would be **significant**. | Proposed Project, Alternative A = S | ~~**Mitigation Measure 3.5-6a: Prepare and Implement a Transportation Demand Management Plan**~~<br>~~This mitigation measure would apply to the proposed Project and Alternative A.~~<br>~~The applicant shall submit to Placer County a Transportation Demand Management Plan (TDM) as part of the development review process. A menu of measures that could be included in TDM plans is provided in TRPA Code Section 65.5.3 and Placer County Code Section 10.20. These measures include:~~<br>~~▶ Preferential carpool/vanpool parking;~~<br>~~▶ Shuttle bus program;~~<br>~~▶ Transit pass subsidies;~~<br>~~▶ Paid parking; and~~<br>~~▶ Direct contributions to transit service.~~<br>**Mitigation Measure 3.5-6~~b~~: Incorporate Design Features and Purchase and Retire Carbon Offsets to Reduce Project-Related Greenhouse Gas Emissions to Zero**<br>This mitigation measure would apply to the proposed Project and Alternative A.<br>The applicant shall implement Mitigation Measure 3.7-1a and 3.7-1b identified in Section 3.7, "Greenhouse Gas Emissions and Climate Change." The applicant shall implement measures to reduce all GHG emissions associated with construction and operation of the Project to zero as detailed therein. More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets are provided in Mitigation Measures 3.7-1a and 3.7-1b~~Section 3.7~~. | Proposed Project, Alternative A = LTS |

| Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|---|---|---|---|
| NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable | | | |
| 3.7 Greenhouse Gas Emissions and Climate Change | | | |
| **Impact 3.7-1: Project-Generated Emissions of GHGs**<br>The proposed Project would result in construction-related GHG emissions totaling 841 $MTCO_2e$/year over a period of up to 4 years and would generate operational emissions of 316 $MTCO_2e$/year. Alternative A would result in construction-related GHG emissions totaling 922 $MTCO_2e$/year over a period of up to 4 years and would generate operational emissions slightly less than what is emitted for the proposed Project. These levels of emissions would not be consistent with Mitigation Measure 12-1 identified in the Area Plan EIR/EIS, which indicates that projects should achieve a no net increase in GHG emissions to demonstrate consistency with statewide GHG reduction goals. Proposed Project- and Alternative A-generated GHG emissions would be potentially significant. | Proposed Project, Alternative A = PS | **Mitigation Measure 3.7-1a: Incorporate All Feasible Onsite Design Features ~~and Purchase and Retire Carbon Offsets~~ to Reduce Project-Related Greenhouse Gas Emissions ~~to Zero~~**<br>This mitigation measure would apply to the proposed Project and Alternative A.<br>The applicant shall implement all feasible measures to reduce all GHG emissions associated with construction and operation of the Project to zero. ~~More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets is provided below.~~ The GHG reductions achieved by the implementation of measures listed below shall be estimated by a qualified third-party selected by Placer County as the agency responsible for building permit issuance. All GHG reduction estimates shall be supported by substantial evidence. Mitigation measures should be implemented even if it is reasonable that their implementation would result in a GHG reduction, but a reliable quantification of the reduction cannot be substantiated. The Project applicant shall incorporate onsite design measures into the Project and submit verification to Placer County prior to issuance of building permits. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8).<br>Construction-Related Greenhouse Gas Emissions<br>The applicant shall implement all onsite feasible measures to reduce GHGs associated with Project construction. Such measures shall include, but are not limited to the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD's CEQA Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.<br>▶ The applicant shall enforce idling time restrictions for construction vehicles. | Proposed Project, Alternative A = LTS |

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

<u>Operational Greenhouse Gas Emissions</u>

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

- The applicant shall achieve zero net energy (ZNE) if feasible. Prior to the issuance of building permits the Project developer or its designee shall submit a Zero Net Energy Confirmation Report (ZNE Report) prepared by a qualified building energy efficiency and design consultant to the county for review and approval. The ZNE Report shall demonstrate that development within the Project area subject to application of the California Energy Code has been designed and shall

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| | | be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, or otherwise achieve an equivalent level of energy efficiency, renewable energy generation, or GHG emissions savings. This measure would differ from the achievement of zero net electricity because ZNE also concerns onsite consumption of natural gas.<br>▶ The applicant shall consult with Liberty Utilities to assess the feasibility of onsite solar. If it is determined that onsite solar is feasible, the building shall include rooftop solar photovoltaic systems to supply electricity to the building.<br>▶ If onsite solar is determined to be feasible, the applicant shall install rooftop solar water heaters if room is available after installing photovoltaic panels.<br>▶ Any household appliances required to operate the building shall be electric and certified Energy Star-certified (including dish washers, fans, and refrigerators, but not including tankless water heaters).<br>▶ All buildings shall be designed to comply with requirements for water efficiency and conservation as established in the CALGreen Code.<br>▶ The applicant shall also provide Level 2 electric vehicle charging stations at a minimum of 10 percent of parking spaces that the Project.<br>▶ The applicant shall dedicate onsite parking for shared vehicles.<br>▶ The applicant shall require gas or propane outlets in private outdoor areas ~~of residential land uses~~ for use with outdoor cooking appliances such as grills if natural gas service or propane service is available.<br>▶ The applicant shall require the installation of electrical outlets on the exterior walls of both the front and back of proposed lodge to support the use of electric landscape maintenance equipment.<br>▶ The applicant shall require the use of energy-efficient lighting for all area lighting.<br>Notably, the California Air Pollution Officers Associations (CAPCOA) identifies parking restrictions as a feasible measure to reduce GHG emissions; however, parking restrictions have not been dismissed as infeasible onsite mitigation due to existing and projected community impacts associated with spill-over parking into nearby residential neighborhoods during peak seasonal periods. Nonetheless, even without limitations on parking availability, a no net increase in GHG emissions can be achieved.<br>~~Carbon Offsets~~ | |

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| | | ~~In addition to implementing all feasible onsite measures to reduction GHGs associated with construction and operation of the Project, the applicant shall offset the remaining levels of GHG emissions to zero by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits from any of the following recognized and reputable voluntary carbon registries:~~<br>~~(A) American Carbon Registry;~~<br>~~(B) Climate Action Reserve; and/or~~<br>~~(C) Verra (formally named Verified Carbon Standard).~~<br>~~The applicant shall demonstrate that it has purchased and retired a sufficient quantity of carbon offsets prior to receipt of building permits from Placer County. The applicant shall purchase and retire a quantity of carbon credits sufficient to fully offset the Project's remaining operational emissions multiplied by the number of years of operation between commencement of operation and 2045, which is the target year of Executive Order B-55-18.~~ | |
| | | **Mitigation Measure 3.7-1b: Purchase Real, Quantifiable, Permanent, Verifiable, Enforceable, and Additional Carbon Offsets**<br>This mitigation measure would apply to the proposed Project and Alternative A.<br>If, following the application of all feasible onsite GHG reduction measures implemented under Mitigation Measure 3.7-1a, the proposed Project or Alternative A would continue to generate GHG emissions in exceedance of a net-zero threshold, the Project applicant shall offset the remaining GHG emissions before the end of the first full year of Project operation to meet the net-zero threshold by funding activities that directly reduce or sequester GHG emissions or by purchasing and retiring carbon credits.<br>CARB recommends that lead agencies prioritize onsite design features, such as those listed under Mitigation Measure 3.7-1a, and direct investments in GHG reductions within the vicinity of a project site to provide potential air quality and economic co-benefits locally (CARB 2017). While emissions of GHGs and their contribution to climate change is a global problem, emissions of air pollutants, which have an adverse localized and regional impact, are often emitted from similar activities that generate GHG emissions (i.e., mobile, energy, and area sources). For example, direct investments in a local building retrofit program could pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, enhanced energy efficient windows, insulation, and water conservation features for homes within the geographic area of the Project. Other examples of local direct investments including financing of regional electric vehicle charging stations, paying for electrification of | |

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| | | public school buses, and investing in local urban forests. These types of investments result in a decrease in GHG emissions to meet the criteria of being real, quantifiable, permanent, verifiable, enforceable, and additional consistency with the standards set forth in Health and Safety Code Section 38562, subdivisions (d)(1) and (d)(2). Such credits shall be based on protocols approved by CARB, consistent with Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by Placer County, TRPA, or Placer County Air Pollution Control District (PCAPCD). Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) through the CAPCOA GHG Rx and PCAPCD.<br><br>Prior to issuing building permits for Project development, Placer County shall confirm that the applicant or its designee has fully offset the Project's remaining (i.e., after implementation of GHG reduction measures pursuant to Mitigation Measure 3.7-1a) GHG emissions by relying upon one of the following compliance options, or a combination thereof:<br>▶ demonstration that the Project applicant has directly undertaken or funded activities that reduce or sequester GHG emissions that are estimated to result in GHG reduction credits (if such programs are available), and retire such GHG reduction credits in a quantity equal to the Project's remaining GHG emissions;<br>▶ demonstration that the applicant shall retire carbon credits issued in connection with direct investments (if such programs exist at the time of building permit issuance) in a quantity equal to the Project's remaining GHG emissions;<br>▶ undertake or fund direct investments (if such programs exist at the time of building permit issuance) and retire the associated carbon credits in a quantity equal to the Project's remaining GHG emissions; or<br>▶ if it is impracticable to fully offset the Project's GHG emissions through direct investments or quantifiable and verifiable programs do not exist, the applicant or its designee may purchase and retire carbon credits that have been issued by a recognized and reputable, accredited carbon registry in a quantity equal to the Project's remaining GHG Emissions. | |

| Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|---|---|---|---|
| NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable | | | |
| **Impact 3.8-3: Operational ~~Event~~ Noise**<br>The proposed Project and Alternative A would be similar to what occurs in the ~~p~~Project vicinity now. ~~l~~Long-term increases in noise would be associated with outdoor recreational and sporting events at the Schilling Lodge. The increases in noise would not exceed applicable Area Plan noise standards (i.e., 55 dBA CNEL). Use of amplified sound would be required to comply with TCPUD rules and regulations and Placer County noise ordinance for operating hours; however, the use of amplified sound at the Schilling Lodge could result in exposure of sensitive receptors to noise levels that exceed the Placer County daytime (7:00 a.m. to 10:00 p.m.) noise standard of 50 dBA $L_{eq}$ for amplified sound sources. This impact would be significant for the proposed Project and Alternative A. | Proposed Project, Alternative A = S | **Mitigation Measure 3.8-3 Minimize Amplified Sound**<br>This mitigation measure would apply to the proposed Project.<br>▶ Building design and layout shall be such that any outdoor amplified speakers face away from offsite sensitive land uses and oriented/located such that the building structure is between the receiving land use and the attached speaker. Building design, layout, and final speaker location shall be identified in final site plans and approved by Placer County before issuance of building permits.<br>▶ To ensure receiving land uses are not exposed to noise levels that exceed Placer County daytime noise standards of 50 dBA $L_{eq}$, outdoor speakers shall be tuned such that combined noise levels from all proposed speakers do not exceed 71 dBA $L_{eq}$ at 50 feet from the source. Sound levels shall be measured in accordance with Placer County Code Chapter 9.36.040 and proof of acceptable noise levels shall be provided to Placer County at the time of final building inspection.<br>This mitigation measure would apply to Alternative A.<br>▶ Building design and layout shall be such that any outdoor amplified speakers face away from offsite sensitive land uses and oriented/located such that the building structure is between the receiving land use and the attached speaker. Building design, layout, and final speaker location shall be identified in final site plans and approved by Placer County before issuance of building permits.<br>▶ To ensure receiving land uses are not exposed to noise levels that exceed Placer County daytime noise standards of 50 dBA $L_{eq}$, outdoor speakers shall be tuned such that combined noise levels from all proposed speakers do not exceed 59 dBA $L_{eq}$ at 50 feet from the source. Sound levels shall be measured in accordance with Placer County Code Chapter 9.36.040 and proof of acceptable noise levels shall be provided to Placer County at the time of final building inspection. | Proposed Project, Alternative A = LTS |

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

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

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

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

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

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

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

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

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

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

## ROADWAY IMPROVEMENTS

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

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

**Table 2-2 Site Development Features**

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

**Table 2-2 Site Development Features**

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

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

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

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

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

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

[5] The Project components contributing to land coverage for the proposed Project are detailed in Table 3.9-4 in Section 3.9, "Geology, Soils, Land Capability, and Coverage."

[6] The Project components contributing to land coverage for Alternative A are detailed in Table 3.9-5 in Section 3.9, "Geology, Soils, Land Capability, and Coverage."

Source: Compiled by TCCSEA in 2018

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

## 2.5.2 Placer County Tahoe Basin Area Plan Mitigation Measures

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

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

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

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

## 2.5.3 Construction Schedule and Activities

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

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

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

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

## 2.6.1 Proposed Project (Site D – Full Project)

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

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

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

## 2.1.3 Revisions to Section 3.1 Approach to the Environmental Analysis

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

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

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

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

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

## 2.1.4 Revisions to Section 3.2 Effects Not Found to be Significant

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

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

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

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

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

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

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

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

## 2.1.5 Revisions to Section 3.3 Biological Resources

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

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

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

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

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

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

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

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

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

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

## 2.1.7 Revisions to Section 3.5 Transportation

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

> The environmental document prepared for the Area Plan (i.e., ~~the Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project EIR/EIS [~~Area Plan EIR/EIS~~]~~) identified plan-level mitigation that would apply to all new construction located within the Area Plan boundaries. Placer County and TRPA developed mitigation measures to address transportation impacts of the Area Plan. Mitigation Measures 10-1b, 10-1c, ~~and~~ 10-1d, and 10-5 are shown below, would apply to the Project, and would be implemented during the Placer County development review process, which is described in Section 2.5.2, "Placer County Tahoe Basin Area Plan Mitigation Measures," in Chapter 2, "Proposed Project and Alternative Evaluated in Detail" (Placer County and TRPA 2016):
>
> Mitigation Measure 10-1b: Establish a County Service Area Zone of Benefit to fund expansion of transit capacity
>
> The key constraint to expanding transit capacity is the availability of ongoing transit operating subsidy funding, as discussed in the recently completed System Plan Update for the Tahoe Truckee Area Regional Transit in Eastern Placer County (LSC 2016). While the proposed Area Plan includes Policy T-P-22 ("Secure adequate funding for transit services so that transit is a viable transportation alternative"), it does not identify a specific mechanism to assure expansion of transit services to address increased peak demand. To provide an ongoing source of operating funding as well as transit bus seating capacity, Placer County shall establish one or more County Service Area Zones of Benefit encompassing the developable portions of the Plan area. Ongoing annual fees would be identified to fund expansion of transit capacity as necessary to expand seating capacity to accommodate typical peak-period passenger loads. At a minimum, this would consist of four additional vehicle-hours of transit service per day throughout the winter season on each of the following three routes: North Shore (North Stateline to Tahoe City), SR 89 (Tahoe City to Squaw Valley), and SR 267 (North Stateline to Northstar), as well as the expansion of transit fleet necessary to operate this additional service. Fees would be assessed on all future land uses that generate an increased demand for transit services, including residential, lodging, commercial, civic, and recreational land uses.
>
> Mitigation Measure 10-1c: Payment of Traffic Mitigation Fees to Placer County
>
> Prior to issuance of any Placer County Building Permits, projects within the Area Plan shall be subject to the payment of established Placer County traffic impact fees that are in effect in this area, pursuant to applicable county Ordinances and Resolutions. Traffic mitigation fees shall be required and shall be paid to the Placer County Department of Public Works and Facilities subject to the County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code. The fees will be calculated using the information supplied. If the use or the square footage changes, then the fees will change. The actual fees paid will be those in effect at the time the payment occurs.
>
> Mitigation Measure 10-1d: Expand Requirements for Transportation Demand Management Plans
>
> To reduce peak-period vehicle trips and improve LOS, future development project proposals which will employ between 20 and 100 employees and/or include tourist accommodation or recreational uses will be required to submit to Placer County a Transportation Demand Management Plan (TDM) upon Development Review. The current threshold for preparation of a TDM or Employee Transportation Plan (TRPA Code Section 65.5.2.B) and compliance with the Placer County Trip Reduction Ordinance (Placer County Code Section 10.20) is 100 or more employees in a single location which applies to a very limited number of sites in the Plan area. This existing requirement also does not address trips that are generated from sources other than employee commutes, and in the Plan area, a large proportion of peak period trips are the result of tourist or visitor trips rather than employee trips.

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

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

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

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

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

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

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

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

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

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

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

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

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

Proposed Project

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

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

## Mitigation Measures

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

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

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

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

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

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

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

Significance after Mitigation

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

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

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

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

## 2.1.8 Revisions to Section 3.6 Air Quality

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

**Table 3.6-1 National and California Ambient Air Quality Standards**

| Pollutant | Averaging Time | CAAQS[1,2] | NAAQS[3] | |
|---|---|---|---|---|
| | | | Primary[2,4] | Secondary[2,5] |
| Ozone | 1-hour | 0.09 ppm (180 µg/m$^3$) | –[e] | Same as primary standard |
| | 8-hour | 0.070 ppm (137 µg/m$^3$) | 0.070 ppm (147 µg/m$^3$) | |
| Carbon monoxide (CO) | 1-hour | 20 ppm (23 mg/m$^3$) | 35 ppm (40 mg/m$^3$) | Same as primary standard |
| | 8-hour | 6 ppm[4, 6] (~~10~~ 7 mg/m$^3$) | 9 ppm (10 mg/m$^3$) | |
| Nitrogen dioxide ($NO_2$) | Annual arithmetic mean | 0.030 ppm (57 µg/m$^3$) | 53 ppb (100 µg/m$^3$) | Same as primary standard |
| | 1-hour | 0.18 ppm (339 µg/m$^3$) | 100 ppb (188 µg/m$^3$) | — |
| Sulfur dioxide ($SO_2$) | 24-hour | 0.04 ppm (105 µg/m$^3$) | — | — |
| | 3-hour | — | — | 0.5 ppm (1300 µg/m$^3$) |
| | 1-hour | 0.25 ppm (655 µg/m$^3$) | 75 ppb (196 µg/m$^3$) | — |
| Respirable particulate matter ($PM_{10}$) | Annual arithmetic mean | 20 µg/m$^3$ | — | Same as primary standard |
| | 24-hour | 50 µg/m$^3$ | 150 µg/m$^3$ | |
| Fine particulate matter ($PM_{2.5}$) | Annual arithmetic mean | 12 µg/m$^3$ | 12.0 µg/m$^3$ | 15.0 µg/m$^3$ |
| | 24-hour | — | 35 µg/m$^3$ | Same as primary standard |
| Lead | Calendar quarter | — | 1.5 µg/m$^3$ | Same as primary standard |
| | 30-Day average | 1.5 µg/m$^3$ | — | — |
| | Rolling 3-Month Average | – | 0.15 µg/m$^3$ | Same as primary standard |

**Table 3.6-1 National and California Ambient Air Quality Standards**

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

Notes: CAAQS = California ambient air quality standards, NAAQS = national ambient air quality standards, µg/m$^3$ = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million

1 California standards for ozone, carbon monoxide, $SO_2$ (1- and 24-hour), $NO_2$, particulate matter, and visibility reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

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

3 National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. The $PM_{10}$ 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m$^3$ is equal to or less than one. The $PM_{2.5}$ 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. Environmental Protection Agency for further clarification and current federal policies.

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

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

6 The California ambient air quality standards are 9 parts per million; however, in the Lake Tahoe Air Basin, this standard is 6 parts per million (7 mg/m$^3$). CARB established this more stringent standard in 1976 based on the Lake Tahoe Basin's elevation and associated thinner air.

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

Source: CARB 2016

In response to a comment on the Draft EIR related to Placer County Air Pollution Control District (PCAPCD) air quality monitoring equipment, this section is revised to update the location of the PCAPCD respirable particulate matter ($PM_{10}$) and fine particulate matter ($PM_{2.5}$) monitoring sites in Tahoe City. The following text edit is made to paragraph 1 on page 3.6-5 of the Draft EIR.

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

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

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

| Pollutant | National Ambient Air Quality Standard | California Ambient Air Quality Standard |
|---|---|---|
| Ozone | – | Attainment (1-hour) |
| | Unclassified/Attainment (8-hour)[1] [2] | Attainment (8-hour) |
| | ~~Nonattainment~~ Unclassified/Attainment (8-hour)[2] [3] | |
| Respirable particulate matter ($PM_{10}$) | Attainment (24-hour) | Nonattainment (24-hour) |
| | | Nonattainment (Annual) |
| Fine particulate matter ($PM_{2.5}$) | Attainment (24-hour) | – |
| | Attainment (Annual) | Attainment (Annual) |
| Carbon monoxide (CO) | Attainment (1-hour) | Attainment (1-hour) |
| | Attainment (8-hour) | Attainment (8-hour) |
| Nitrogen dioxide ($NO_2$) | Attainment (1-hour) | Attainment (1-hour) |
| | Attainment (Annual) | Attainment (Annual) |
| Sulfur dioxide ($SO_2$)[3] | Unclassified/Attainment (1-Hour) | Attainment (1-hour) |
| | | Attainment (24-hour) |
| Lead (Particulate) | Attainment (3-month rolling avg.) | Attainment (30 day average) |
| Hydrogen Sulfide | No Federal Standard | Unclassified (1-hour) |
| Sulfates | | Attainment (24-hour) |
| Visibly Reducing Particles | | Unclassified (8-hour) |
| Vinyl Chloride | | Unclassified (24-hour) |

Notes:

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

[2] ~~2008~~ 2010 – Standard

[3] ~~2010~~ 2015 – Standard

Source: CARB 2018

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

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

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

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

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

## 2.1.9 Revisions to Section 3.7 Greenhouse Gas Emissions and Climate Change

In response to a comment on the Draft EIR, the "TRPA Best Construction Practices Policy for Construction Emissions" section is revised to update the location of the PCAPCD respirable particulate matter ($PM_{10}$) and fine particulate matter ($PM_{2.5}$) monitoring sites in Tahoe City. The following text edit is made to paragraph 4 on page 3.7-4 of the Draft EIR:

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

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

> [c]onsistent with Chapter 65 of the TRPA Code of Ordinances, construction of the Project was assumed to be limited to May 1 through October 15. Based on assumptions developed in the initial planning stages for the Project, construction was assumed to commence on May 1, 2020 and end in June 2023, when the Project would become operational. However, as described under Section 2.5.3, "Construction Schedule and Activities,"' Project construction activities may be completed faster, estimated to begin~~ning~~ in ~~2021~~2022 instead of 2020 and completed in 2 years rather than 4 years. Construction would be limited to Monday through Friday within exempt hours.

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

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

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

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

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

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

> ### Mitigation Measure 3.7-1a: Incorporate All Feasible Onsite Design Features ~~and Purchase and Retire Carbon Offsets~~ to Reduce Project-Related Greenhouse Gas Emissions ~~to Zero~~
>
> This mitigation measure would apply to the proposed Project and Alternative A.
>
> The applicant shall implement all feasible measures to reduce all GHG emissions associated with construction and operation of the Project to zero. ~~More detail about measures to reduce construction-related GHGs, operational GHGs, and the purchase of carbon offsets is provided below.~~ The GHG reductions achieved by the implementation of measures listed below shall be estimated by a qualified third-party selected by Placer County as the agency responsible for building permit issuance. All GHG reduction estimates shall be supported by substantial evidence. Mitigation measures should be implemented even if it is reasonable that their implementation would result in a GHG reduction, but a reliable quantification of the reduction cannot be substantiated. The Project applicant shall incorporate onsite design measures into the Project and submit verification to Placer County prior to issuance of building permits. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8).
>
> #### Construction-Related Greenhouse Gas Emissions
>
> The applicant shall implement all onsite feasible measures to reduce GHGs associated with Project construction. Such measures shall include, but are not limited, to the measures in the list below. Many of these measures are identical to, or consistent with, the measures listed in Appendix B of the 2017 Scoping Plan (CARB 2017:B-7 to B-8), Appendix F-1 of PCAPCD's CEQA Thresholds of Significance Justification Report (PCDAPCD 2016), and measures listed in Mitigation Measure 12-1 of the Placer County Tahoe Basin Area Plan (TRPA 2017b). The effort to quantify the GHG reductions shall be fully funded by the applicant.
>
> - The applicant shall enforce idling time restrictions for construction vehicles.
> - The applicant shall increase use of electric-powered construction equipment including use of existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators.
> - The applicant shall require diesel-powered construction equipment to be fueled with renewable diesel fuel. The renewable diesel product that is used shall comply with California's Low Carbon Fuel Standards and be certified by the California Air Resources Board Executive Officer.

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

Operational Greenhouse Gas Emissions

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

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

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

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

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

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

~~(A) American Carbon Registry;~~

~~(B) Climate Action Reserve; and/or~~

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

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

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

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

Significance after Mitigation

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

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

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

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

## 2.1.10 Revisions to Section 3.8 Noise

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

### Impact 3.8-3: Operational ~~Event~~ Noise

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

Proposed Project

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

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

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

### Construction Noise and Vibration Levels

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

### Operational Event Noise

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

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

### Operational Traffic Noise

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

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

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

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

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

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

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

## 2.1.12 Revisions to Section 3.10 Hydrology and Water Quality

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

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

## 2.1.13 Revisions to Section 3.11 Utilities

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

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

## 2.1.14 Revisions to Section 3.12 Energy

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

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

## 2.1.15 Revisions to Chapter 4 Alternatives

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

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

| Item | Proposed Project | Alternative A | No Project Alternative (Existing Conditions) | Site A – Modified Project | Site D – Reduced Project |
|---|---|---|---|---|---|
| Lodge[1] | 10,154 sq. ft. | 10,154 sq. ft. | 2,723 sq. ft.[2] | 8,661 sq. ft.[3] | 6,229 sq. ft. |
| Parking | 100 total parking spaces (59,799 sq. ft.) | 100 total parking spaces (49,446 sq. ft.) | 46~~51~~ total spaces[4] (approx. 16,820 sq. ft.) | 100 total parking spaces (55,803 sq. ft.) | 65 total parking spaces (53,184 sq. ft.) |
| | 4 disabled parking spaces | 4 disabled parking spaces | 2 disabled parking spaces | 4 disabled parking spaces | 4 disabled parking spaces |
| | 2 bus parking spaces | 2 bus parking spaces | 0 | 2 bus parking spaces | 2 bus parking spaces |
| School Connector | Yes | No | No | No | Yes |
| Patio | 6,808 sq. ft. | 6,808 sq. ft. | 1,345 sq. ft. | 6,808 sq. ft. | 6,808 sq. ft. |

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

| Item | | Proposed Project | Alternative A | No Project Alternative (Existing Conditions) | Site A – Modified Project | Site D – Reduced Project |
|---|---|---|---|---|---|---|
| Kinder Sled Storage | | 80 sq. ft. | 80 sq. ft. | Along building in parking lot | 80 sq. ft. | 80 sq. ft. |
| Bike Racks | | 2 | 2 | 0 | 2 | 2 |
| Yurt | | 706 sq. ft. | 706 sq. ft. | 706 sq. ft. | 706 sq. ft. | 706 sq. ft. |
| Trees to be Removed | Total | 183[45] | 79[45] | 0 | 152[56] | <183[56] |
| | Trees > 30 inches dbh | 15[45] | 7[45] | 0 | 4[67] | 9[67] |
| New Land Coverage[910] | | 81,593 sq. ft.[78] | 67,619 sq. ft.[89] | 0 | 74,487 sq. ft. | 73,105 sq. ft. |
| Site Grading/Excavation | | 3,728 cu. yd. cut/ 1,785 cu. yd. fill | 3,446 cu. yd. cut/ 1,723 cu. yd. fill | NA | 2,950 cu. yd. cut/ 1,425 cu. yd. fill | 3,360 cu. yd. cut/ 1,082 cu. yd. fill |

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

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

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

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

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

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

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

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

[78] The Project components contributing to land coverage for the proposed Project are detailed in Table 3.9-4 in Section 3.9, "Geology, Soils, Land Capability, and Coverage."

[89] The Project components contributing to land coverage for Alternative A are detailed in Table 3.9-5 in Section 3.9, "Geology, Soils, Land Capability, and Coverage."

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

Source: Compiled by Ascent Environmental in 2020

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

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