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Addendum to the Environmental Impact Report Tahoe Cross-Country Lodge Replacement and Expansion Project

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Prepared for:

Tahoe City Public Utility District
221 Fairway Drive
Tahoe City, CA 96145

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Prepared for:



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Public Utility District**

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LIST OF ABBREVIATIONS

ADA	Americans with Disabilities Act
CEQA	California Environmental Quality Act
CRHR	California Register of Historic Resources
dbh	diameter at breast height
EIR	Environmental Impact Report
GHG	greenhouse gas
SEIR	Subsequent or Supplemental EIR
SEZ	stream environmental zone
sf	square feet
SWPPP	Stormwater Pollution Prevention Plan
Tahoe XC	Tahoe Cross-Country Center
TCCSEA	Tahoe Cross Country Ski Education Association
TCPUD	Tahoe City Public Utility District

1 INTRODUCTION

1.1 BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

EIR Certification and Project Approval. In February 2021, the Tahoe City Public Utility District (TCPUD) Board of Directors certified the Environmental Impact Report (EIR) for the Tahoe Cross-Country Lodge Replacement and Expansion Project (approved project) and approved the project.

The project applicant, the Tahoe Cross Country Ski Education Association (TCCSEA), is proposing the approved project, which includes the relocation of recreation and community uses currently provided by TCCSEA at the existing Tahoe Cross-County Lodge (existing lodge) to a new lodge site off Polaris Road and adjacent to the North Tahoe High School and North Tahoe Middle School. The new lodge is located approximately 0.65 mile west of the existing lodge site. Figure 1-1 shows the location of the existing lodge and the new lodge site. The approved project would reconstruct and adaptively reuse the historic Schilling Residence, which would serve as the lodge for the cross-country ski area. TCCSEA's objectives of the approved project are to address existing operational deficiencies relative to circulation and parking, storage, staff facilities, and community space; better accommodate existing and future recreation demand; and improve the quality of the recreation user experience. Additionally, the approved project consolidates the existing accessory buildings (primarily storage) into a single facility, eliminates or minimizes spillover parking on adjacent residential streets, and provides more amenities to serve guests and employees. These improvements would better serve additional recreational opportunities and community needs, especially in non-winter seasons. With construction of the approved project, the existing lodge at the Highlands Community Center building, owned by TCPUD, would remain in its current location and continue to serve TCPUD community needs and functions. No changes to the existing Highlands Park trail system or adjacent trails on state property were proposed as part of the approved project.

Summary of Minor Changes to the Approved Project. During the final design conducted in support of project permitting, the design team incorporated required mitigation measures identified in the certified EIR and completed additional consultation with utility providers. As the final design elements progressed, it was identified that the primary change to the approved project would require an alternate route for a utility conduit connecting the project site to an existing utility conduit to accommodate operation of the project. The route of this utility corridor was selected because it would avoid the need to make substantial service upgrades in Polaris Road to make the new connection, it would cost less, and based on discussions with Liberty Utilities would be easier to maintain and would involve less disturbance than the original route considered in the certified EIR. In addition, the final design plans and project site, encompassing the area leased to TCCSEA from TCPUD for operation of the new lodge (lease area) extend outside of the project site boundaries evaluated in the certified EIR that were based on conceptual mapping at the time. Figure 1-2 shows the boundaries of the project site evaluated in this addendum, which includes the lease area, the extent of potential construction disturbance, and the proposed route for the utility conduit, relative to the project site boundary evaluated in the certified EIR. Likely the additional 3.6-acre area was the result of a mapping error. The extent of construction related ground disturbance is 0.4 acre less than what was contemplated in the EIR. Figures 1-3a and 1-3b show the design details for the new utility connection. Other components of the approved project that have been refined include:

- ▶ Increasing the lodge building size from 10,154 square feet (sf) to 10,365 sf, in part to accommodate Americans with Disabilities Act (ADA) requirements.
- ▶ Moving the proposed location of the lodge building approximately 30 feet to the west to reduce meadow intrusion and provide additional space for the planned solar panel arrangement.
- ▶ Incorporating a shared parking agreement with North Tahoe High School and redesigning the parking area to a three-island configuration, thereby reducing the number of spaces in the parking lot to 70 from the 100 spaces contemplated as part of the approved project.

- ▶ Reduction in parking lot size and use of pervious concrete for sidewalks and patios resulting in reduced impervious land coverage from 81,593 sf to 77,376 sf.
- ▶ Incorporating greenhouse gas (GHG) reduction strategies to meet the net-zero emissions targets as outlined in Mitigation Measure 3.7-1 of the certified EIR. Strategies include installation of 165 solar panels distributed between three locations (rooftop, basement entrance, and over parking area), a geothermal heat pump system, reuse of 22,621 board feet of interior/exterior siding lumber, milling lumber from trees removed to accommodate the project, installation of six electric vehicle chargers in the parking lot, and development of a rideshare program. In addition, the project applicant would pay an in lieu fee to Placer County to fund off-site GHG reduction projects and Tahoe-Truckee Area Regional Transit operations to meet the carbon offset requirements for the project's remaining operational emissions beyond the reductions achieved through the implementation of feasible on-site GHG reduction measures.
- ▶ Design of two landscape features along the east side of the parking area and driveway to screen the view of vehicles from the closest residences.

1.2 PURPOSE OF AN EIR ADDENDUM

Once an EIR or other California Environmental Quality Act (CEQA) document has been prepared and certified/adopted for a project, no additional environmental review is necessary unless certain conditions are met, at which point subsequent review under CEQA may be necessary. Public Resources Code Section 21166 and Sections 15162-15164 of the State CEQA Guidelines define the standards for determining the appropriate level of subsequent environmental review and Section 15164 addresses the specific circumstances requiring the preparation of an addendum to an EIR. If new significant impacts or a substantial increase in the severity of impacts would result, then preparation and circulation of a Subsequent or Supplemental EIR (SEIR) for additional public review is required. However, when it can be determined that neither the proposed changes to the project, changed circumstances, or new information result in the identification of new significant impacts, or the substantial increase in the severity of significant impacts identified in the certified EIR, an addendum to the EIR may be prepared. Public review of an addendum is not required under CEQA.

Changes to the approved project and any altered conditions since certification of the EIR in February 2021 would:

- ▶ Not result in any new significant environmental effects, and
- ▶ Not substantially increase the severity of previously identified significant effects.

In addition, no new information of substantial importance has arisen that shows that:

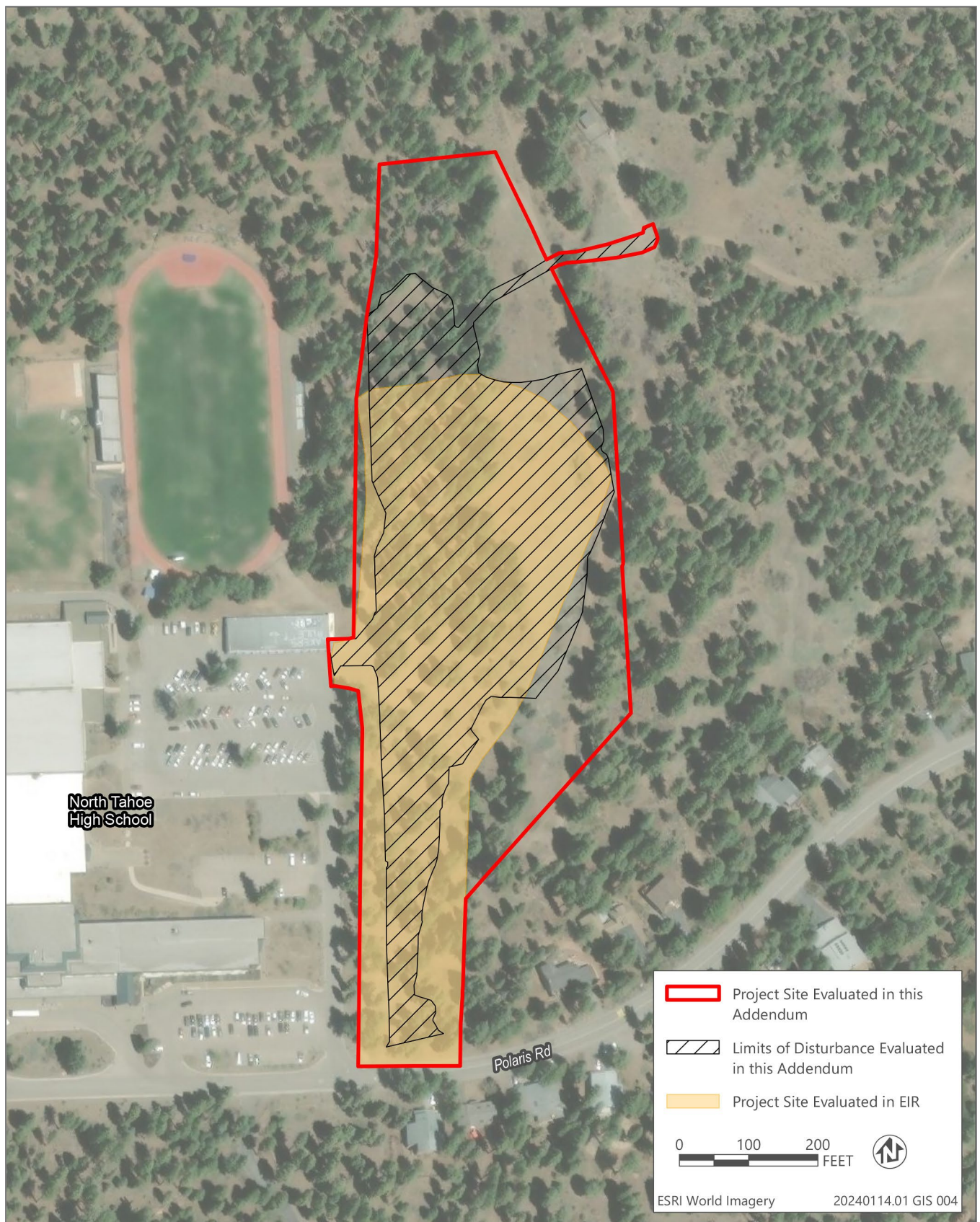
- ▶ The project would have new significant effects,
- ▶ The project would have substantially more severe effects,
- ▶ Mitigation measures or alternatives previously found to be infeasible would in fact be feasible, or
- ▶ Mitigation measures or alternatives that are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the environment.

As described in Section 2 of this document, "Project Description," and Section 3, "Affected Environment, Environmental Consequences, and Mitigation Measures," none of the conditions described above for Section 15162 calling for preparation of a SEIR have occurred. Therefore, the differences between the approved project, as described in the certified EIR, and the project modifications now being considered constitute changes consistent with State CEQA Guidelines Section 15164 that may be addressed in an addendum to an EIR.



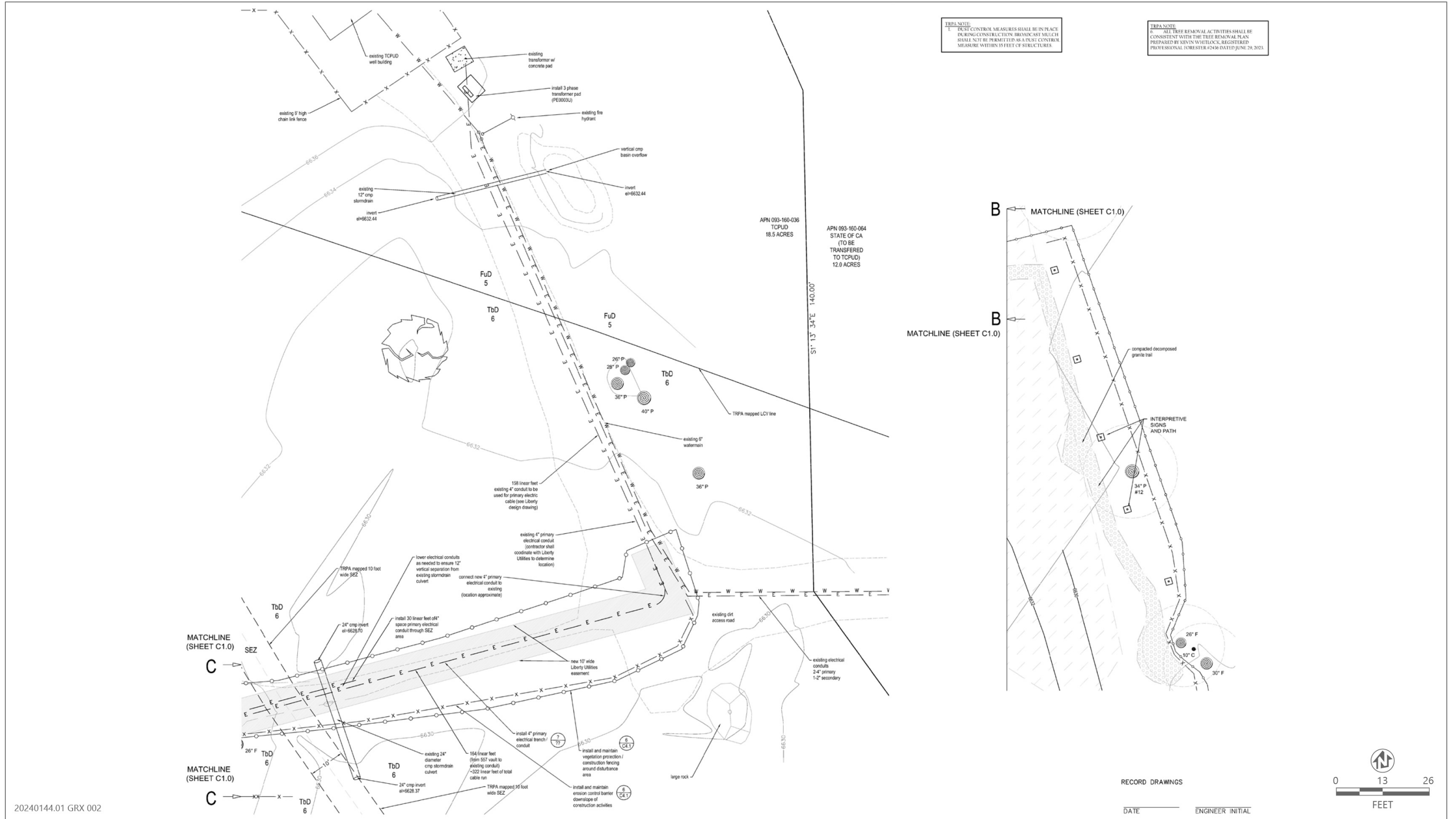
Source: Adapted by Ascent in 2024.

Figure 1-1 Location of Existing Lodge and New Lodge Site



Source: Adapted by Ascent in 2024.

Figure 1-2 Project Site Evaluated in this Addendum



Source: Image produced and provided by Tieslau Civil Engineering in 2024; Adapted by Ascent in 2024

Figure 1-3b Civil Grading and Utility Plan

2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

The existing lodge is located at the Highlands Park and Community Center at 925 Country Club Drive near Tahoe City in Placer County. The approved project site is located approximately 0.65 mile west of the Existing Lodge off Polaris Road adjacent to the North Tahoe High School and North Tahoe Middle School (see Figure 1-1). The approved project proposes to repurpose and adaptively reuse the historic Schilling Residence on the project site to be the new lodge for the cross-country ski area.

2.2 APPROVED PROJECT

The approved project has three distinct elements: (1) to relocate, expand, and adaptively reconstruct the historic Schilling residence into a new building (the Schilling Lodge); (2) to construct associated improvements, including a driveway and parking lot, utilities, landscaping, and outdoor community areas; and (3) to relocate the functions and operations of the Tahoe Cross-Country Center (Tahoe XC) to a new location. The approved project would construct the Schilling Lodge through the adaptive reuse of the Schilling residence, with an added basement and gear rental space, and would improve parking, and create additional opportunities for year-round recreational and community use.

2.3 PROPOSED MODIFICATIONS TO THE APPROVED PROJECT

During the final design conducted in support of project permitting, the design team incorporated required mitigation measures identified in the certified EIR and completed additional consultation with utility providers. As the final design elements progressed, it was determined that modifications to the approved project were needed, the most significant of which would require an alternate utility conduit connecting the project site to an existing utility conduit northeast of the project site. The certified EIR anticipated extension of utility service from utility lines in Polaris Road at the southern end of the project site. In addition, the final design plans and lease area extend outside of the project site boundaries evaluated in the certified EIR that were based on conceptual mapping at the time. As mentioned in Section 1, "Introduction," Figure 1-2 shows the boundaries of the project site evaluated in this addendum, which includes the lease area, the extent of potential construction disturbance, and the proposed route for the utility conduit, relative to the project site boundary evaluated in the certified EIR.

The proposed new location for the utility conduit would be approximately 380 linear feet connecting between the north end of the project site and the existing utility corridor along an east-northeasterly route. The existing utility corridor runs along a natural surface road that accesses an existing TCPUD pumphouse, to which the utility corridor connects. A new easement would be established to accommodate the utility corridor, and a 2-foot wide by 5-foot-trench would be constructed and would cross a seasonal stream and stream environmental zone (SEZ) that are present along the alignment. The alignment avoids the mature willow and medium-sized trees in the area. The route of this utility corridor was selected because it would avoid the need to make substantial service upgrades in Polaris Road to make the new connection, it is less costly, and based on discussions with Liberty Utilities would be easier to maintain and would involve less disturbance than the original route considered in the certified EIR.

In addition, as part of construction of the new utility connection, a vault midway through the run would be installed to allow for future maintenance. Liberty Utilities would design the new utility system, and the project applicant would install it. Post construction, the route for the alternate utility conduit connection would be backfilled and restored to pre-project conditions including the natural surface road and disturbed vegetated areas would be revegetated. Following installation, Liberty Utilities would take possession of the line and be responsible for ongoing maintenance. Figures 1-3a and 1-3b show the design details for the new utility connection.

Other components of the approved project that have been refined include:

- ▶ Increasing the lodge building size from 10,154 sf to 10,365 sf, in part to accommodate ADA requirements.
- ▶ Moving the proposed location of the lodge building approximately 30 feet to the west to reduce meadow intrusion and provide additional space for the planned solar panel arrangement.
- ▶ Incorporating a shared parking agreement with North Tahoe High School and redesigning the existing parking area to a three-island configuration, thereby reducing the number of spaces in the new parking lot to 70 from the 100 spaces contemplated as part of the approved project.
- ▶ Reduction in parking lot size and use of pervious concrete for sidewalks and patios resulting in reduced impervious land coverage from 81,593 sf to 77,376 sf.
- ▶ Incorporating greenhouse gas (GHG) reduction strategies to meet the net-zero emissions targets as outlined in Mitigation Measure 3.7-1 of the certified EIR. Strategies include installation of 165 solar panels, a geothermal heat pump system, reuse of 22,621 board feet of interior/exterior siding lumber, milling lumber from trees removed to accommodate the project, installation of six electric vehicle chargers in the parking lot, and development of a rideshare program. In addition, the project applicant would pay an in-lieu fee to Placer County to fund off-site GHG reduction projects and Tahoe-Truckee Area Regional Transit operations to meet the carbon offset requirements for the project's remaining operational emissions beyond the reductions achieved through the implementation of feasible on-site GHG reduction measures.
- ▶ Design of two landscape features along the east side of the parking area and driveway to screen the view of vehicles from the closest residences.

These minor changes would reduce the number of large trees to be removed from the site from 15 trees to 7 trees greater than 30 inches diameter at breast height (dbh). Additionally, these changes would involve more cut and fill, though use of native soil to construct the landscape features would offset some of the incremental increase in material hauled off-site. Additionally, all rocks removed from the subsurface excavations would be retained for use on-site as part of rock retaining walls and parking restriction, further reducing the need for off-site hauling. The solar panels to be installed as part of implementation of Mitigation Measure 3.7-1 would be located in three locations including the lodge rooftop, at grade over the entrance to the basement, and elevated over the parking area. The panels chosen would be REC Solar Peak 3 panels, which are designed to reduce and avoid glare.

3 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND MITIGATION MEASURES

This section of the addendum analyzes the potential effects on the existing physical environment from implementation of the proposed modifications, as compared to the approved project. This analysis has been prepared to determine whether any of the conditions that would require preparation of a SEIR would occur as a result of the proposed modifications.

The following documents were used to prepare this addendum and are incorporated by reference

- ▶ Tahoe City Public Utility District. 2020. Draft Environmental Impact Report for the Tahoe Cross-Country Lodge Replacement and Expansion Project. SCH No. 2018062045. Prepared by Ascent Environmental. June 2020.
- ▶ Tahoe City Public Utility District. 2021. Final Environmental Impact Report for the Tahoe Cross-Country Lodge Replacement and Expansion Project. SCH No. 2018062045. Prepared by Ascent Environmental. February 2021.

3.1 APPROACH TO THE ENVIRONMENTAL ANALYSIS

As stated previously in Section 1.2, "Purpose of an EIR Addendum," TCPUD has determined that, in accordance with Public Resources Code Section 21166 and Section 15164 of the State CEQA Guidelines, minor technical changes or additions to the Tahoe Cross-Country Lodge Replacement and Expansion Project EIR are necessary to address the modifications to the approved project.

An addendum to a certified EIR is prepared when changes to a project are required, and the changes:

- ▶ Will not result in any new significant environmental effects, and/or
- ▶ Will not substantially increase the severity of previously identified effects.

The analysis of environmental effects provided below addresses the same impacts addressed in the Tahoe Cross-Country Lodge Replacement and Expansion Project certified EIR. The environmental analysis evaluates for each environmental topic area (e.g., biological resources, cultural resources) whether there are any changes in the project or the circumstances under which it would be undertaken that would result in new or substantially more severe environmental impacts than considered in the Tahoe Cross-Country Lodge Replacement and Expansion Project EIR.

Issues Not Analyzed Further in this Addendum

The proposed modifications described in this addendum constitute changes to the approved project that will not result in new significant impacts not previously identified in the EIR, or a substantial increase in the severity or intensity of the significant impacts that were identified. In part because the proposed modifications would not involve the construction of new structures, additional capacity of the approved project, increases in the intensity of certain activities, or a modification of operations of the approved project, and the final design of the project implements GHG reduction strategies required as part of the certified EIR, an addendum was deemed appropriate for the proposed modifications. Resource areas that do not result in the need for additional detailed consideration therefore include:

- ▶ Aesthetics
- ▶ Agriculture and forestry resources
- ▶ Air Quality
- ▶ Energy
- ▶ Geology and soils
- ▶ Greenhouse gas emissions and climate change
- ▶ Hazards and hazardous materials
- ▶ Hydrology and water quality
- ▶ Land use and planning
- ▶ Mineral resources
- ▶ Noise
- ▶ Population and housing
- ▶ Public services
- ▶ Recreation
- ▶ Transportation
- ▶ Utilities
- ▶ Wildfire

Additionally, as described in the certified EIR and required as part of construction of the project, TCCSEA would implement a Stormwater Pollution Prevention Plan (SWPPP) and comply with California Building Code standards such that no additional impacts to water quality and geology and soils would result from the proposed modifications. The proposed modifications would affect temporary (construction-related) activities and none of the contemplated project modifications would adversely affect the previously disclosed operational impacts of the Tahoe Cross-Country Lodge Replacement and Expansion Project.

As described above, the solar panels to be installed as part of implementation of Mitigation Measure 3.7-1 would be located in three locations including the rooftop of the lodge, at grade over the entrance to the basement, and elevated over the parking area. As discussed in the certified EIR, the project site is located in a forested area that is not elevated above its surroundings, is not within a scenic highway, and would not block any views of Lake Tahoe, from a public road, or other public area. In addition, the project site was selected over other locations because it minimized visibility to neighbors; however, limited obstructed views of the project site can be seen through the forest by recreation uses on nearby trails and public lands as well as staff, students, and visitors to North Tahoe Middle School and North Tahoe High School. While installation of rooftop solar panels and panels in the parking lot would not be visible from any residences, the at grade panels above the entrance to the basement could be visible from a limited number for residences (two to three residences) along Polaris Drive. However, the panels chosen for the project would be REC Solar Peak 3 panels, which are designed to reduce and avoid glare and would blend in with the developed nature of the project site. Moreover, as discussed in the certified EIR, the project would comply with Placer County Area-Wide Standards and Guidelines as well as TRPA Scenic Quality Improvement Program and Design Review Guidelines.

All newly identified areas of disturbance would be restored by grading to natural surface elevations and seeding/planting with native species. Additional daily equipment and construction workers beyond that previously identified in the certified EIR would not be necessary to perform the proposed modifications, thereby resulting in no increased intensity of construction. Further, with the additional work area identified above for the new utility conduit, all mitigation measures identified in the certified EIR to reduce construction-related impacts (e.g., implementation of best management practices and compliance with an approved Stormwater Pollution Prevention Plan [SWPPP]) would be implemented for the proposed modifications to prevent additional or more substantial impacts. While the proposed modifications would involve more excavation and an increase in the amount of material to be hauled off-site, the use of native soil to construct landscape features and retaining all rocks removed from the subsurface excavations for use on-site as part of rock retaining walls and parking restriction would reduce the amount of fill to be hauled off site. In addition, as mentioned above, the extension of the lease area boundaries outside of the project site boundaries evaluated in the certified EIR were based on conceptual mapping at the time and were a result of a mapping error. While the lease area expanded, the limits of construction and disturbance area would not change substantially from what was evaluated in the certified EIR.

Also, because most of the proposed modifications would primarily involve minor changes to the size and location of the lodge building, incorporation of a shared parking agreement, a reduction in the number of trees to be removed, and implementation of GHG reduction strategies required as mitigation for implementation of the project, this addendum focuses on the potential effects of the new utility connection.

Issues Carried Forward for Further Analysis in this Addendum

The following issue areas have been evaluated in further detail in this addendum with respect to the proposed modifications to the previously approved Tahoe Cross-Country Lodge Replacement and Expansion Project, because of the potential for the alternate utility conduit to adversely affect these resources and the location of utility conduit route outside of the project site boundaries considered in the certified EIR.

- ▶ Biological Resources
- ▶ Cultural Resources

3.2 BIOLOGICAL RESOURCES

ENVIRONMENTAL ISSUES	Where Impact was Analyzed in the DEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Do Mitigation Measures in the DEIR Address/ Resolve Impacts, Including Impacts That Would Otherwise be New or Substantially More Severe?
I. Biological Resources				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?	Impact 3.3-1 Impact 3.3-3	No	No	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS; or have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Impact 3.3-2	No	No	N/A
c. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Impact 3.3-1 Impact 3.3-4	No	No	N/A
d. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Impact 3.3-2 Impact 3.3-3	No	No	Yes
e. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan	Section 3.3, page 3.3-1	No	No	N/A

EIR Analysis

The certified EIR for the Tahoe Cross-Country Lodge Replacement and Expansion Project found that the approved project could result in impacts to special-status plants, trees protected by TRPA regulations, and potential establishment and spread of invasive plants. These impacts were determined to be potentially significant, necessitating the implementation of mitigation.

The certified EIR for the Tahoe Cross-Country Lodge Replacement and Expansion Project also found that the approved project would result in less than significant or no impacts on wildlife species; wildlife corridors; riparian, wetland, or other sensitive vegetation types, or an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state conservation plan.

Mitigation Measures

With respect to special-status plants, Mitigation Measure 3.3-1 would require that any special-status plants are avoided and protected from construction activities, or that the applicant compensates for those plants that are removed.

Impacts related to tree removal would occur if tree removal activities would conflict with TRPA regulations that prohibit the removal of trees larger than 30 inches dbh in westside forest types in lands classified as recreation, without appropriate mitigation and approval by TRPA. Implementation of Mitigation Measure 3.3-2 would ensure compliance with existing TRPA regulations and policies to identify potentially significant tree removal and minimize or avoid those impacts through the design and permitting process.

Mitigation Measure 3.3-3 requires invasive plant management practices be implemented during project construction, and the inadvertent introduction and spread of invasive plants during construction be prevented. Implementation of this mitigation measure would reduce impacts related to the potential establishment and spread of invasive plants to less than significant.

Changes Resulting from Modifications to the Project

Construction of the new utility conduit crosses an area not previously considered in the certified EIR. On June 27, 2024, Alison Stanton, a qualified Botanist, conducted a pre-construction survey of the project site including the new area proposed for the utility conduit. Approximately 100 feet of the area proposed for the utility conduit occurs primarily within the upland forest. Where the utility conduit alignment exits the upland forest, approximately 116 feet of the alignment lies within an area that was graded and planted for a golf course fairway and still has buried irrigation pipes on the site. This area was seeded and is primarily dominated by blue wildrye (*Elymus glaucus*), a perennial native grass. The remainder of the utility conduit alignment occurs within the roadbed of an existing natural surface road. The existing natural surface road crosses a narrow seasonal stream channel that qualifies as stream environmental zone (SEZ) (Appendix A).

During the June 27, 2024 field survey, neither of the two special-status botanical species identified in the certified EIR (Davy's sedge [*Carex Davyi*] and short-leaved hulsea [*Hulsea brevifolia*]) were observed within the project site including the new area proposed for the utility conduit. There is very little to no understory vegetation with very sparse shrubs and few forbs. The quality of the habitat is marginal and has been degraded from residential, recreation, and commercial uses on and near the site; adjacent roads; and associated edge effects. Therefore, the potential for either special-status plant species to occur in the forested habitat is very low. Where the alignment exits the forest and lies within an open seeded area, two mature Scouler's willow (*Salix scouleriana*) with sparse shrubs including bitterbrush (*Purshia tridentata*) and mule's ear (*Wyethia mollis*) occur in this area. This open seeded area of the alignment also does not provide suitable habitat for sensitive species. The remainder of the alignment follows a road that has a 24-inch corrugated metal culvert. The culvert area on the north side of the road is open and has an assortment of forbs species that are typical in wetlands including horse mint (*Agastache urticifolia*), yampa (*Perideridia sp.*), and yarrow (*Achillea millifolium*). The culvert area on the south side of the road provides a small amount of

riparian habitat with some mature Scouler's willow and a few upland shrubs including bitterbrush and green-leaved manzanita (*Arctostaphylos patula*). No sensitive plants or invasive species were detected in the two areas of the road (Appendix A).

Short-leaved hulsea is known from gravelly soils in montane forest and would not be expected to occur in a seeded grassland, the roadbed, or the sliver of SEZ at the culvert. In addition, its distribution is located south of the Lake Tahoe Basin in Mariposa, Madera, and Fresno Counties. Davy's sedge is known to occur in dry sparse meadows and is usually, but not always, found in wetlands. The SEZ at the culvert could provide a very limited amount of habitat for Davy's sedge, however, the area receives a heavy amount of disturbance from recreation and vehicles accessing the pump station. Therefore, the quality of the habitat is marginal at best.

Moreover, the proposed utility conduit is designed to avoid mature willow and medium-sized trees, and would not impact riparian habitat or the SEZ. Trenching required for the utility conduit would be wholly contained within the existing disturbance of the roadway and the existing placement of the culvert under the road. This includes the operation of construction equipment as well. Also, and as stated above, TCCSEA would implement a Stormwater Pollution Prevention Plan (SWPPP) and comply with California Building Code standards such that no additional impacts to water quality and geology and soils would result from the proposed. Additionally, none of the invasive plant species with potential to occur were observed with the project area including the new area proposed for the utility conduit.

One special-status wildlife species—mule deer (*Odocoileus hemionus*), which is designated by TRPA as a "special interest" species—is present throughout the region and was identified as having a moderate potential to occur on the project site; however, no evidence of mule deer was observed during the June 27, 2024 field survey. It is possible that mule deer may occasionally migrate through or forage on the project site, however, they would not be expected to fawn or regularly use the site due to high levels of existing human disturbance and a lack of high-quality forage and cover. Mule deer could also occasionally utilize the riparian habitat near the SEZ when water is present and pass through to browse on the seeded grass; however, implementation of the proposed modifications would not impede movements and would not result in adverse effects on this wildlife species.

Conclusion

The proposed modifications to the Tahoe Cross-Country Lodge Replacement and Expansion Project would not result in new significant impacts or substantially more severe impacts related to biological resources, nor would any changes in circumstances occur that would result in new significant impacts or substantially more severe impacts related to biological resources. No new information of substantial importance related to biological resources has been identified, and none of the conditions described in Public Resources Code Section 21166 and State CEQA Guidelines Sections 15162 and 15163 that require for preparation of a subsequent EIR or supplement to an EIR would occur.

3.3 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Where Impact was Analyzed in the DEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Do Mitigation Measures in the DEIR Address/ Resolve Impacts, Including Impacts That Would Otherwise be New or Substantially More Severe?
I. Archaeological, Historical, and Tribal Cultural Resources				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines?	Impact 3.4-1	No	No	N/A
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines?	Impact 3.4-2	No	No	Yes
c. Cause substantial adverse change in the significance of a TCR, defined in PRC Section 21074?	Impact 3.4-3	No	No	Yes
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	Impact 3.4-4	No	No	N/A

EIR Analysis

The certified EIR for the Tahoe Cross-Country Lodge Replacement and Expansion Project found that the approved project could result in impacts on unique archaeological resources and tribal cultural resources or ethnic and cultural values. These impacts were determined to be potentially significant, necessitating the implementation of mitigation.

The certified EIR for the Tahoe Cross-Country Lodge Replacement and Expansion Project also found that the approved project would result in less than significant or no impacts on historical resources and previously unidentified human remains.

Mitigation Measures

With respect to unique archaeological resources, Mitigation Measure 3.4-2 would require halting ground-disturbing activities in the event of discovery of subsurface archaeological features and the implementation of measures to mitigate potential impacts on archaeological resources and avoid degradation of ethnic and cultural values.

Impacts related to tribal cultural resources or ethnic and cultural values would also be mitigated to less than significant through the implementation of Mitigation Measure 3.4-2 as well as Mitigation Measure 3.4-3 which require halting ground-disturbing activities in the event of discovery of subsurface archaeological features and the

implementation of measures to mitigate potential impacts on archaeological resources and avoid degradation of ethnic and cultural values.

Changes Resulting from Modifications to the Project

A cultural resources memorandum was prepared for the alternate utility conduit and is provided as Appendix B. The memorandum included a records search of the California Historical Resources Information System conducted at the North Central Information Center, creating a survey area, and a pedestrian survey.

The results of the records search review revealed that seven cultural resource studies have been conducted within the survey area and that an additional 11 cultural resources studies have been completed for lands within a 0.25-mile radius. The studies cover 100 percent of the survey area, and they were conducted between 1987 and 2017. In addition, the results of the records search revealed one previously recorded cultural resource, P-31-002008, within the survey area and that one previously recorded cultural resource, P-31-005793, was found within the 0.25-mile radius. P-31-005793 is a historic era archaeological site that consists of road and associated roadside artifacts. P-31-002008 is a historic era road segment of the Old County Road originally recorded in 2003 by Margo Memmott and Lizzie Bennett. The most recent update occurred in 2016 by Susan Lindstrom who also surveyed the area in 2016 for the approved project.

Old County Road (P-31-002008) may date at least to 1889, or earlier as the route may be schematically shown on maps dating to 1874 and 1876. The Old County Road alignment appears to be the primary route around Lake Tahoe's north-central shore until ca. 1940. By 1940 the primary road around the north end of the lake was shifted to the current SR 28 corridor and the Old County Road alignment was designated as a secondary roadway. The 225-foot section of the road recorded within the project site has been recommended ineligible for listing in the California Register of Historic Resources (CRHR) due to lack of integrity. All but 15 feet have been disturbed by either bulldozer activity or grading for the former golf course. Its setting has also been compromised by construction of the school to the west and the residential development to the south.

On August 14, 2024, Ascent archaeologist Roberto Mora conducted a pedestrian survey of the survey area. Ground visibility was poor (0-25 percent) due to vegetation (duff, litter, and tree fell) within the survey area. During the pedestrian survey, all visible ground surface in the survey area was carefully examined for cultural material (e.g., flaked stone tools, tool-making debris, stone milling tools, or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic era debris (e.g., metal, glass, ceramics). P-31-002008 was relocated and found to be in the same condition as previously recorded. No new cultural resources were encountered as a result of the pedestrian survey.

No new impacts to cultural resources would result from implementation of the proposed modifications.

Conclusion

Since the certified EIR was adopted, modifications to the approved project have occurred that require new analysis and verification. As noted above, no new impacts to cultural resources would result from implementation of the proposed modifications. With implementation of Mitigation Measure 3.4-2 as well as Mitigation Measure 3.4-3, impacts related to archaeological and tribal cultural resources would be reduced to less than significant in the case of accidental discoveries during ground disturbing activities. Therefore, the conclusions of the certified EIR remain valid, and approval of the proposed modifications would not result in new or substantially more severe significant impacts to cultural resources.

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4 REFERENCES

- Tahoe City Public Utility District. 2020. Draft Environmental Impact Report for the Tahoe Cross-Country Lodge Replacement and Expansion Project. SCH No. 2018062045. Prepared by Ascent Environmental. June 2020.
- Tahoe City Public Utility District. 2021. Final Environmental Impact Report for the Tahoe Cross-Country Lodge Replacement and Expansion Project. SCH No. 2018062045. Prepared by Ascent Environmental. February 2021.

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5 LIST OF PREPARERS

Tahoe City Public Utility District (Lead Agency)

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Sue Rae Irelan.....TCCSEA Board Member

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Appendix A

Tahoe Cross Country Lodge Project -
Preconstruction Botanical Survey



Alison E. Stanton, Botanist, M.S. 3170 US Highway 50 Suite #7 South Lake Tahoe, CA 96150 415.990.2269

To: SueRae Irelan, Board Member and Project Member, Tahoe XC Lodge Project
CC: Garth Alling, Principal, Ecotone Solutions LLC.
From: Alison E. Stanton, Botanist, M.S.
Date: July 8, 2024
Re: Tahoe Cross Country Lodge Project-preconstruction botanical survey

The Tahoe Cross Country (XC) Lodge Project (Project) will begin construction in mid to late July, 2024 on a new lodge and trailhead facilities on a forested parcel just west of the North Tahoe Middle and High School campus in Tahoe City, CA. The Environmental Impact Report (EIR) for the Project identified 2 special-status botanical species with potential to occur on the proposed Project site and a total of 14 invasive plant species known to occur in the Placer County portion of the Lake Tahoe Basin. The EIR mitigation measure to minimize and avoid potential project-related effects on botanical resources, including sensitive and invasive plants, requires pre-construction surveys as follows:

Mitigation Measure 3.3-1: Avoid, Minimize, and Compensate for Disturbance or Loss of Special-Status Plants

The Project applicant shall implement the following measures to reduce potential impacts on special-status plants:

- *Before commencement of any Project construction for each phase of construction and during the blooming period for the special-status plant species with potential to occur on the Project site, a qualified botanist shall conduct protocol-level surveys for special-status plants in areas that were not surveyed previously and where potentially suitable habitat would be removed or disturbed by Project activities.*
- *If no special-status plants are found, the botanist shall document the findings in a letter report to TCPUD and CDFW and no further mitigation will be required.*

Mitigation Measure 3.3-3: Implement Invasive Plant Management Practices During Project Construction

The Project applicant shall implement appropriate invasive plant management practices during Project construction. Recommended practices include the following:

- *A qualified biologist will conduct a preconstruction survey to determine whether any populations of invasive plants are present within areas proposed for ground-disturbing activities. This could be conducted in coordination with the focused special-status plant survey recommended above under Mitigation Measure 3.3-1.*



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This memo summarizes the results of the pre-construction field survey conducted on June 27, 2024 to examine the area for the presence of sensitive plant species and invasive plants. Alison Stanton is a qualified Botanist with more than 20 years of professional experience, primarily within the Tahoe Basin. Ms. Stanton conducted the field survey by walking the entire Project site observing plant species and habitat quality and looking for sensitive plants and invasive plants. The timing of the survey was appropriate for the blooming period of both sensitive species (May-August) that were identified and also for invasive plants. No sensitive or invasive plant species were found.

The field survey had a particular focus on the 380' total feet of trench alignment that will be required for supplying electrical services from an existing pump house to the new facilities. The first 100' of the trench length is primarily within the upland forest. Where the alignment exits the forest, approximately 116' of the trench lies within an area that was graded and planted for a golf course fairway and still has buried irrigation pipes on the site. This area was seeded and is primarily dominated by blue wildrye (*Elymus glaucus*), a perennial native grass. The remainder of the trench lies within the road bed of an existing dirt road that accesses the pump house. The existing dirt road crosses a narrow seasonal stream channel that qualifies as riparian Stream Environment Zone (SEZ).

Sensitive plants and wildlife

The preliminary data review for the Environmental Impact Report (EIR) for the Project identified 26 special-status animal species and 30 special-status botanical species known or with potential to occur in the Lake Tahoe Basin and that could occur on the proposed Project if suitable habitats were present. Of these 56 animal and plant species, the EIR determined that only three species have a moderate likelihood to occur and the remainder have a low (or no) potential and are not expected to occur. This determination was based on the types, extent, and quality of habitats present in the Project area; the proximity of the sites to known occurrences of the species; and the regional distribution and abundance of the species.

One special-status wildlife species – mule deer (*Odocoileus hemionus*), which is designated by TRPA as “special interest” – was identified as having a moderate potential to occur on the proposed Project site. Two special-status botanical species-Davy’s sedge (*Carex davyi*) and short-leaved hulsea (*Hulsea brevifolia*)- were identified as having a moderate potential to occur in the upland montane conifer forest found on the Project site. Davy’s sedge is known to occur near Martis Peak, but not known from the Project vicinity. Short-leaved hulsea has not been documented within the Lake Tahoe basin. Mule deer are present throughout the region.



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During the June 27, 2024 field survey, neither short-leaved hulsea nor Davy's sedge were observed within the conifer forest present on the Project site. No evidence of mule deer was observed. The conifer overstory is primarily Jeffrey pine (*Pinus jeffreyi*) and white fir (*Abies concolor*). Canopy cover is moderate to sparse and there is very little to no understory vegetation with very sparse shrubs and few forbs. **Photo 1** shows typical conditions within the forest. The quality of the habitat is marginal and has been degraded from residential and recreation uses on and near the site. Therefore, the potential for either plant species to occur in the forested habitat is negligible. It is possible that mule deer may occasionally migrate through or forage on the Project site, however, they would not be expected to fawn or regularly use the site due to high levels of existing human disturbance and a lack of high-quality forage and cover.

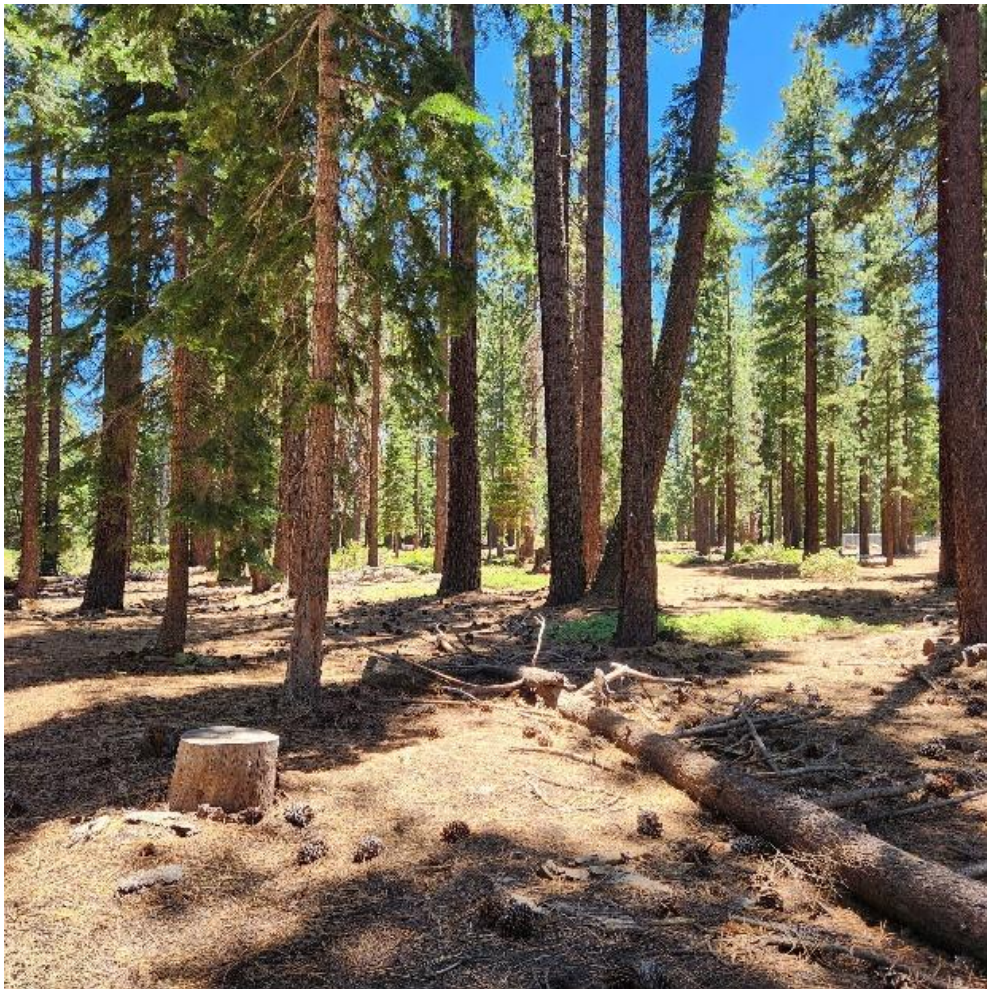


Photo 1. Typical forest habitat on the Project site.



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The electrical trench alignment exits the forest into an open seeded area that has 2 mature Scouler's willow (*Salix scouleriana*) with sparse shrubs including bitterbrush (*Purshia tridentata*) and mule's ear (*Wyethia mollis*). **Photo 2** shows the view of the alignment looking northeast. The open seeded area along the trench does not provide suitable habitat for the 2 sensitive plant species. Mule deer could pass through to browse on the seeded grass present in this area.



Photo 2. View along trench alignment after exiting forest, looking northeast.



Alison E. Stanton, Botanist, M.S. 3170 US Highway 50 Suite #7 South Lake Tahoe, CA 96150 415.990.2269

As the alignment continues east, it follows a road that has a 24" corrugated metal culvert. The culvert area on the north side of the road is open and has an assortment of forbs species that are typical in wetlands including horse mint (*Agastache urticifolia*), yampa (*Perideridia sp.*), and yarrow (*Achillea millifolium*). The culvert area on the south side of the road provides a very small amount of riparian habitat with some mature Scouler's willow and a few upland shrubs including bitterbrush and green-leaved manzanita (*Arctostaphylos patula*). Photos 3 and 4 shows opposite sides of the culvert. No sensitive plants or invasive plants were detected at either location.



Photo 3. North side of trench alignment at road culvert.



Photo 4. South side of trench alignment at road culvert.

Short-leaved hulsea is known from gravelly soils in montane forest and would not be expected to occur in a seeded grassland, the roadbed, or the sliver of SEZ at the culvert. In addition, it's distribution is located south of the Lake Tahoe Basin in Mariposa, Madera, and Fresno Counties.

Davy's sedge is known to occur in dry sparse meadows and is usually, but not always, found in wetlands. The SEZ at the culvert could provide a very limited amount of habitat for Davy's sedge, however, the area receives a heavy amount of disturbance from recreation and vehicles accessing the pump station. Therefore, the quality of the habitat is marginal at best.

Mule deer could occasionally utilize the riparian habitat when water is present and pass through to browse on the seeded grass. Implementation of the Project is not likely to pose a significant impact on this movement.



Invasive plants

Table 1 lists the 14 invasive plants with potential to occur. None of these species were observed within the Project area during the June 27 field survey.

Table 1. Invasive plants with potential to occur in the Placer Co. portion of the LTBMU.

Common Name	Scientific Name	LTBWCG	C DFA	Cal-IPC	LTBMU
Cheatgrass	Bromus tectorum	-	-	High	Low
Bull thistle	Cirsium vulgare	Group 2	-	Moderate	High
Poison hemlock	Conium maculatum	-	-	Moderate	Medium
Scotch broom	Cytisus scoparius	Group 2	C	High	Medium
Klamath weed	Hypericum perforatum	Group 1	C	Moderate	Medium
Dyer’s woad	Isatis tinctoria	-	B	Moderate	Medium
Broadleaved pepperweed	Lepidium latifolium	Group 2	B	High	Medium
Oxeye daisy	Leucanthemum vulgare	Group 2	-	Moderate	Medium
Dalmatian toadflax	Linaria dalmatica ssp. dalmatica	Group 2	A	Moderate	High
Butter and eggs	Linaria vulgaris	Group 2	-	Moderate	Medium
Eurasian water milfoil	Myriophyllum spicatum	-	C	High	N/A
Scotch thistle	Onopordum acanthium ssp. acnathium	Group 1	A	High	High
Russian thistle	Salsola tragus	-	C	Limited	-
Woolly mullein	Verbascum thapsus	-	-	Limited	-

Summary

No sensitive plants or invasive plants were detected in the Project area during this pre-construction survey. No mule deer or evidence of use were observed, however, they could utilize the area for forage on an occasional basis. Due to the lack of sensitive plants or habitat found on the site, the marginal habitat quality present for mule deer, and the high levels of existing use and disturbance, the determination in the certified EIR for the Tahoe Cross-Country Lodge Replacement and Expansion Project that “*the Project is likely to result in a less than significant or no impact on wildlife or plant species, wildlife corridors, or sensitive vegetation types (including riparian/wetland habitat)*” is accurate. This memo will be submitted to the TCPUD and CDFW and no further action is required.

Appendix B

Cultural Resources Memorandum -
Tahoe Cross-Country Lodge
Replacement and Expansion Project

Memo



455 Capitol Mall, Suite 300
Sacramento, CA 95814
916.444.7301

Date: August 28, 2024

To: Kim Boyd, Tahoe City Public Utility District

From: Roberto Mora, M.A., RPA; Archaeologist, Ascent

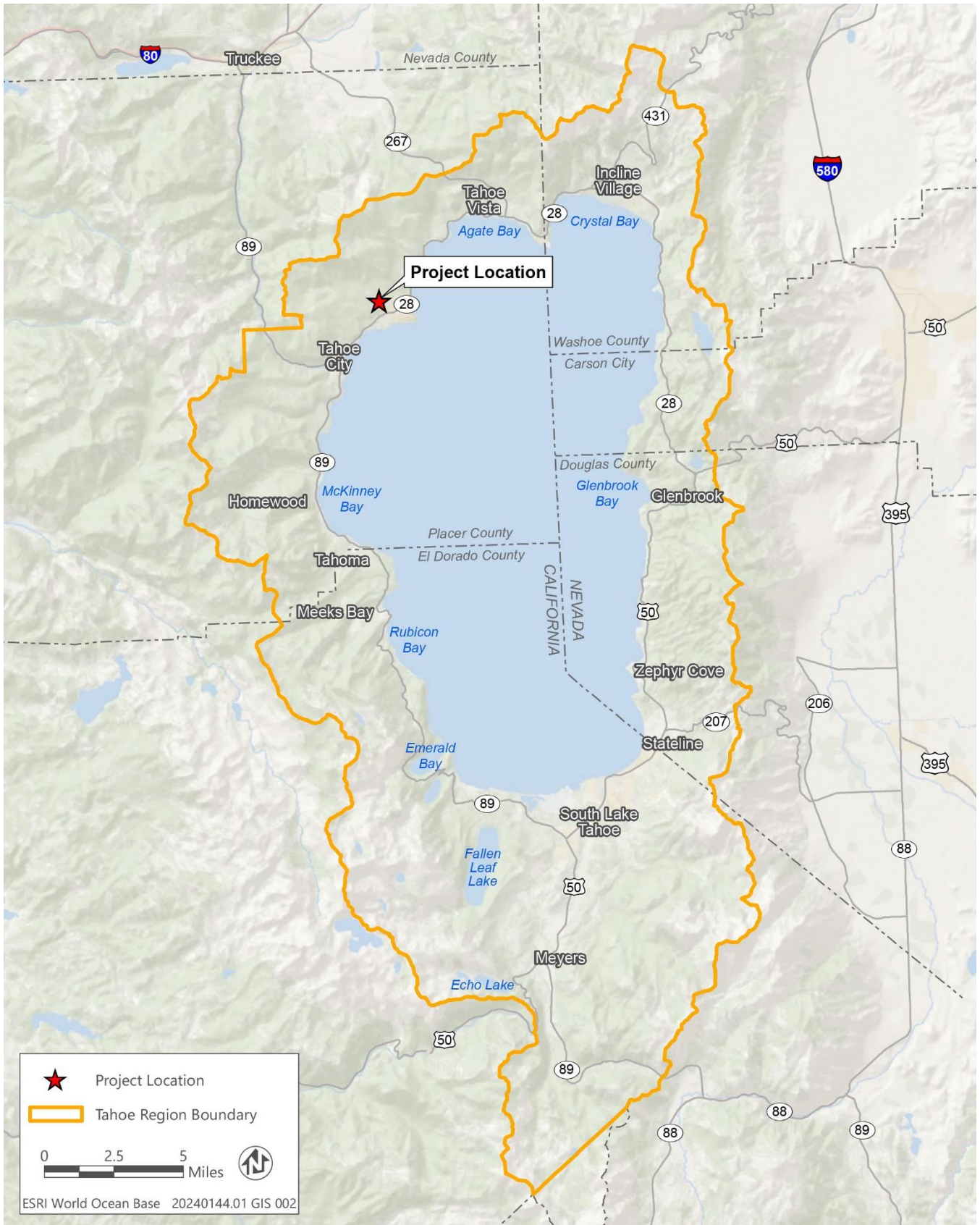
Subject: Cultural Resources Memorandum- Tahoe Cross-Country Lodge Replacement and Expansion Project

INTRODUCTION AND PURPOSE

Ascent Environmental has been retained to prepare a cultural resources memorandum in support of a California Environmental Quality Act (CEQA) addendum for the Tahoe Cross-Country Lodge Replacement and Expansion Project; the environmental impact report for the Tahoe Cross-Country Lodge Replacement Project was certified in February 2021 (SCH No. 2018062045). This memo documents a records search of the California Historical Resources Information System at the North Central Information Center (NCIC), intensive pedestrian survey of the project site, and an assessment of potential impacts to cultural resources. This document was completed in compliance with Section 15064.5(a)(2)-(3) of CEQA Guidelines, using the criteria outlined in Section 5024.1 of the California Public Resources Code (PRC).

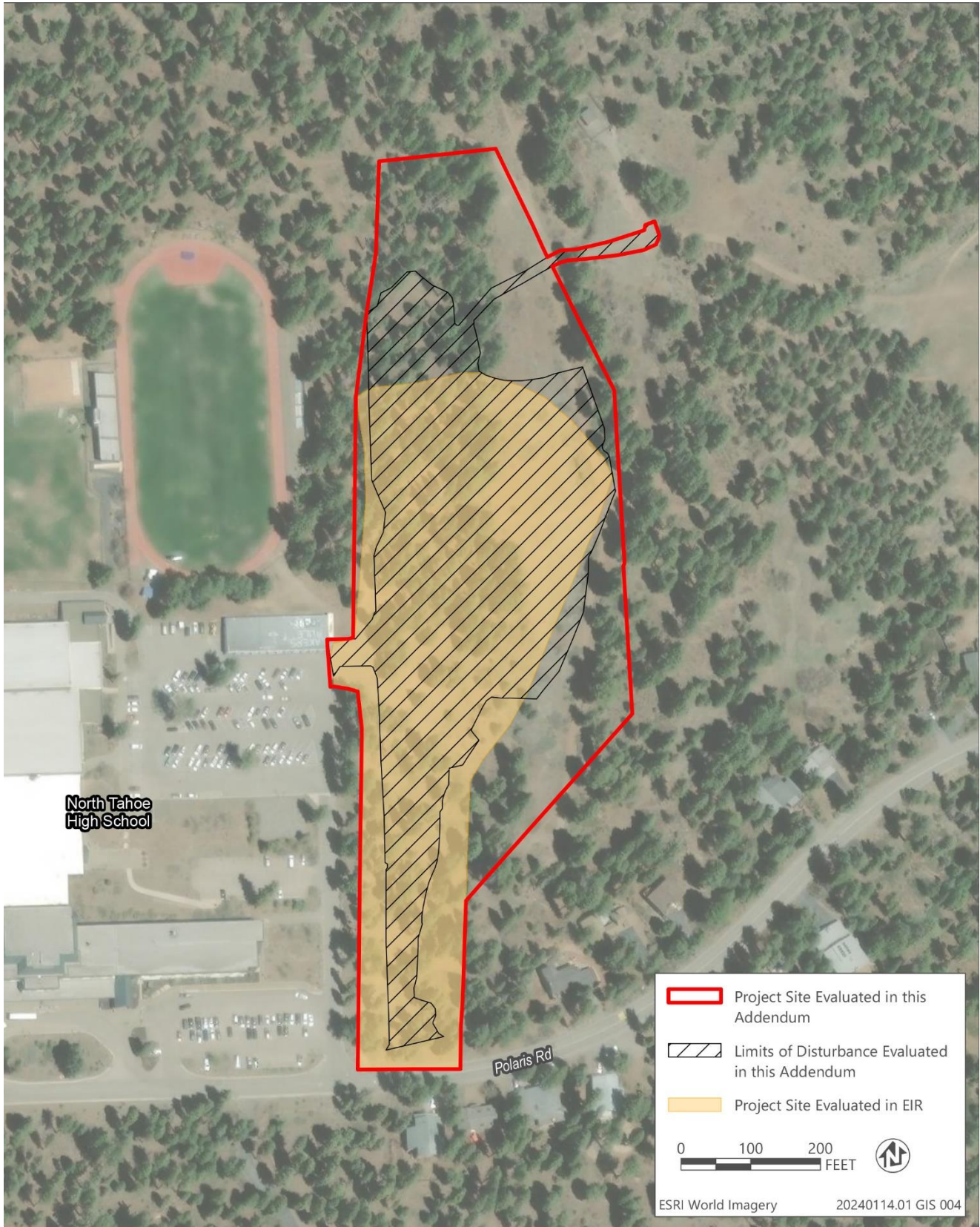
The approved project site is located near Tahoe City in Placer County, off Polaris Road. The site is adjacent to the North Tahoe High School and North Tahoe Middle School, both located at 2945 Polaris Road (see Figures 1 and 2). The approved project has three distinct elements: (1) to relocate, expand, and adaptively reconstruct the historic Schilling residence into a new building (the Schilling Lodge), (2) to construct associated improvements, including a driveway and parking lot, utilities, landscaping, and outdoor community areas, and (3) to relocate the functions and operations of the Tahoe Cross-Country Center to a new location. The approved project would construct the Schilling Lodge through the adaptive reuse of the Schilling residence, with an added basement and gear rental space, and would improve parking, and create additional opportunities for year-round recreational and community use.

During the final design and permitting process for the approved project, it was determined that modifications to the approved project were needed, the most significant of which would require a new utility conduit connecting the project site to an existing utility conduit. The proposed new utility conduit would be approximately 380 linear feet connecting between the north end of the project site and the existing utility corridor along an east-northeasterly route. The existing utility corridor runs along a natural surface road that accesses an existing TCPUD pumphouse, to which the utility corridor connects. Approximately 100 feet of the proposed utility conduit alignment was included within the project site boundaries of the approved project. The remaining approximately 280 feet crosses an area not previously considered. In addition, the modifications include creating additional space for the planned solar panel arrangement. A 50-foot buffer was added to the modified project site boundary for the cultural survey (Survey Area) in order to capture any potential marginal changes to the utility alignment (Figure 3).



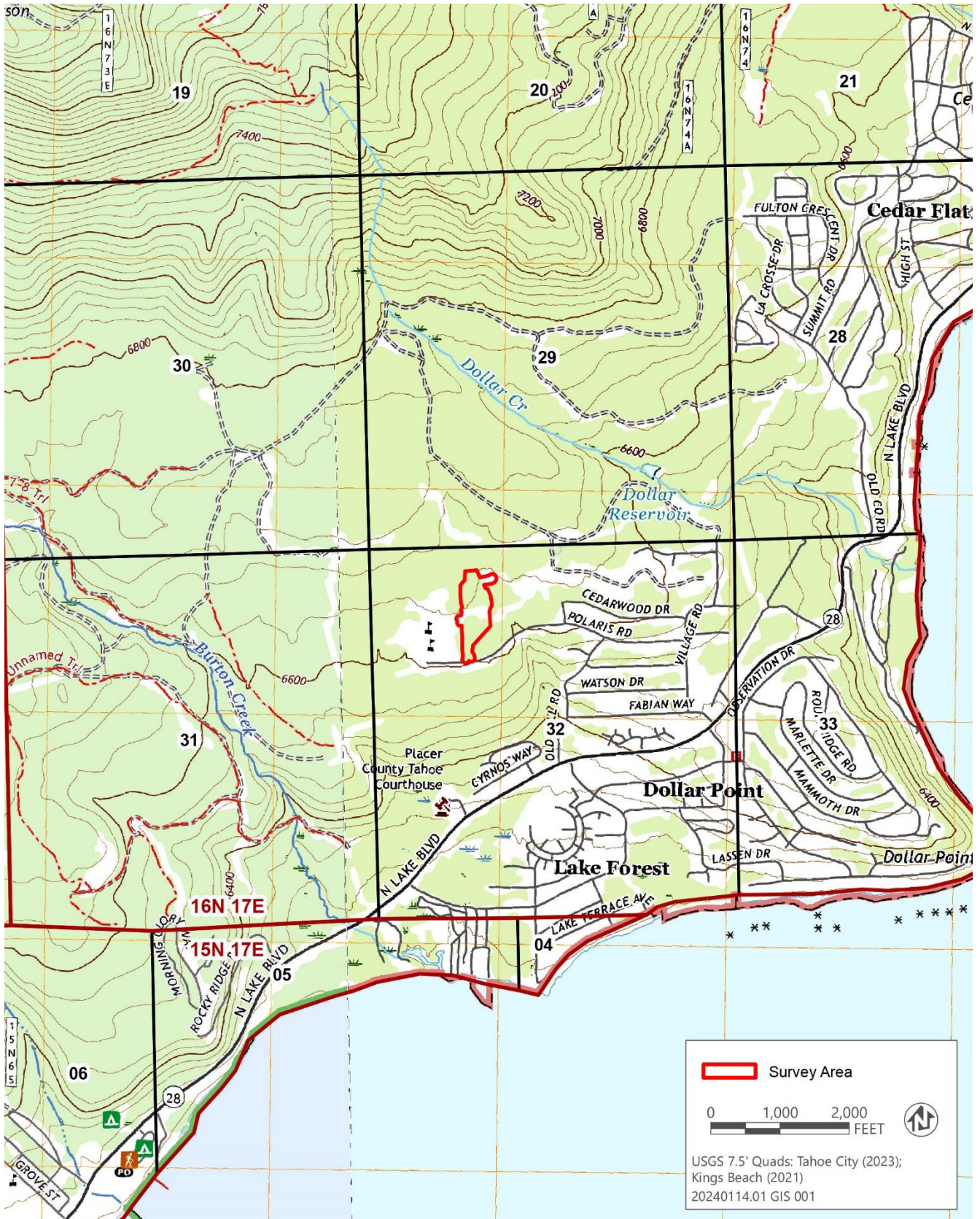
Source: Adapted by Ascent in 2024.

Figure 1 Regional Location



Source: Adapted by Ascent in 2024.

Figure 2 Project Site



Source: Adapted by Ascent in 2024.

Figure 3 Survey Area

REGULATIONS PERTAINING TO CULTURAL RESOURCES

CEQA requires public agencies to consider the effects of their actions on “historical resources,” and “unique archaeological resources.” Pursuant to PRC Section 21084.1, a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” “Historical resource” is a term with a defined statutory meaning (PRC Section 21084.1; State CEQA Guidelines Sections 15064.5[a] and [b]). Under State CEQA Guidelines Section 15064.5(a), historical resources include the following:

- 1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (CRHR; PRC Section 5024.1).
- 2) A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).
- 4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]) or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

CEQA also requires lead agencies to consider whether projects will affect unique archaeological resources. PRC Section 21083.2(g) states that “unique archaeological resource” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

- 1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Register of Historical Resources

The CRHR is a listing of State of California resources that are significant in the context of California’s history. It is a Statewide program with a scope and with criteria for inclusion similar to those used for the National Register of Historic Places (NRHP). All properties in California that are listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR. In addition, properties designated under municipal, or county ordinances are also eligible for listing in the CRHR.

A historic resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria

are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria for significance:

- Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- Criterion 2. Is associated with the lives of persons important to local, California, or national history.
- Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.
- Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

A property must have both significance and integrity to be considered eligible for listing in the CRHR. Loss of integrity, if sufficiently great, will overwhelm the historical significance of a resource and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible. Integrity is evaluated by regarding the property's retention of its location, design, setting, workmanship, materials, feeling, and association to its period of significance. These seven factors can be roughly grouped into three types of integrity considerations. Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship, as they apply to historic buildings, relate to construction methods and architectural details. Feeling and association are the least objective of the seven factors and pertain to the overall ability of the property to convey a sense of the historical time and place in which it was constructed.

Analysis

On August 5, 2024, a records search of the survey area and a 0.25-mile buffer was conducted at NCIC, at California State University Sacramento (NCIC File No.: PLA-24-79; Attachment A). The following information was reviewed as part of the records search:

- NRHP and CRHR,
- Archaeological Determinations of Eligibility,
- California Inventory of Historic Resources,
- California State Historic Landmarks,
- California Points of Historical Interest, and
- Historical GLO land plat maps.

The results of the records search review revealed that seven cultural resource studies have been conducted within the survey area and that an additional 11 cultural resources studies have been completed for lands within a 0.25-mile radius. The studies cover approximately 100 percent of the survey area, and they were conducted between 1987 and 2017. In addition, the results of the records search revealed one previously recorded cultural resource, P-31-002008, within the survey area and that one previously recorded cultural resource, P-31-005793, was found within the 0.25-mile radius. P-31-005793 historic era archaeological site that consists of road and associated roadside artifacts. P-31-002008 is a historic era road segment of the Old County Road originally recorded in 2003 by Margo Memmott and Lizzie Bennett. The most recent update occurred in 2018 by Susan Lindstrom which was an addendum to the 2017 approved project.

Old County Road (P-31-002008) may date at least to 1889, or earlier as the route may be schematically shown on maps dating to 1874 and 1876. The Old County Road alignment appears to be the primary route around Lake Tahoe's north-central shore until ca. 1940. By 1940 the primary road around the north end of the lake was shifted to the

current SR 28 corridor and the Old County Road alignment was designated as a secondary roadway. The 225-foot section of the road recorded within the project site has been recommended ineligible for listing in the CRHR due to lack of integrity. All but 15 feet have been disturbed by either bulldozer activity or grading for the former golf course. Its setting has also been compromised by construction of the school to the west and the residential development to the south.

Survey Methods: On August 14, 2024, Ascent archaeologist Roberto Mora conducted a pedestrian survey of the survey area (Figure 3). Ground visibility was poor (0-25 percent) due to vegetation (duff, litter, and tree fell) within the survey area. During the pedestrian survey, all visible ground surface in the survey area was carefully examined for cultural material (e.g., flaked stone tools, tool-making debris, stone milling tools, or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic era debris (e.g., metal, glass, ceramics). P-31-002008 was relocated and found to be in the same conditions as previously recorded. No new cultural resources were encountered as a result of the pedestrian survey. A digital camera was used to take photographs of the survey area and a selection of these are provided in Figures 4 and 5.



Source: Ascent Environmental in 2024

Overview of the southern portion of the Survey Area. Northwest view. Taken on August 14, 2024.



Source: Ascent Environmental in 2024

Ground surface obscured by short grasses and weeds. East view. Taken on August 14, 2024.

Figure 4 Western Portion of the Survey Area



Source: Ascent Environmental in 2024

Expanded area directly adjacent to the new utility conduit. South view. Taken on August 14, 2024.



Source: Ascent Environmental in 2024

Location for the new utility conduit. East view. Taken on August 14, 2024.

Figure 5 Eastern Portion of the Survey Area

Conclusion: In accordance with State CEQA Guidelines (CCR 15064.5 and CCR 15126.4), the effects of the proposed project within the survey area have been assessed. The NCIC records search revealed a historic era road, P-31-002008, within the survey area. P-24-0002008 was recommended not eligible for the CRHR as a historical resource and is therefore not a resource under CEQA. As such, a finding of no impact to historical resources is recommended under CEQA. Although, unlikely, ground disturbing activities could still impact yet undiscovered cultural resources, it is recommended that the following measures be implemented for the project:

- Inadvertent Discoveries: In the event that any precontact or historic era subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, are discovered during construction, the construction contractor shall halt all ground-disturbing activity within 100 feet of the resources and shall notify TRPA and TCPUD. A qualified professional archaeologist shall be retained by the applicant to assess the significance of the find. Specifically, the archaeologist shall determine whether the find qualifies as a historical resource, a unique archaeological resource, or tribal artifacts. If the find does fall within one of these three categories, the qualified archaeologist shall then make recommendations to TCPUD regarding appropriate procedures that could be used to protect the integrity of the resource and to ensure that no additional resources are affected. Procedures could include but would not necessarily be limited to, preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery, with preservation in place being the preferred option if feasible. If the find is a tribal artifact, TCPUD shall provide a reasonable opportunity for input from representatives of any tribe or tribes the professional archaeologist believes may be associated with the artifact. The tribal representative will determine whether the artifact is considered a TCR, as defined by PRC Section 21074. TCPUD shall require the applicant to implement such recommended measures if it determines that they are feasible in light of project design, logistics, and cost considerations.

Discovery of human remains is not expected; however, if human remains should be discovered, the following measure should be implemented.

- Inadvertent Discovery of Human Remains: If In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, MCRWMA’s contractor shall immediately halt potentially damaging excavation within 50 feet of the burial and notify Placer County Coroner and a professional archaeologist to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). Following the coroner’s findings, the archaeologist, and NAHC-designated Most Likely Descendent shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California Public Resources Code Section 5097.94.

Personnel Qualifications:

Roberto Mora holds a BS in anthropology, an MA in Cultural Resources Management, and is an RPA. He has over 10 years of cultural resource management experience throughout the western United States and has served as the lead archaeological technician and co-field director on a variety of project types. Roberto has expertise in the precontact history of the Great Basin and California, human osteology, faunal remains, monitoring, survey and excavation methods, and laboratory analysis. His experience includes archaeological survey, monitoring, excavation, laboratory processing and cataloging, report writing, and data recovery of precontact and historic-era archaeological sites. Roberto meets the Secretary of the Interior’s Standards for archaeology and the Caltrans Professional Qualification Standards as a principal investigator in precontact archaeology.