

**ADDENDUM
TO THE SOUTH TAHOE GREENWAY SHARED-USE
TRAIL PROJECT INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

**FOR THE
DENNIS T. MACHIDA MEMORIAL GREENWAY
-VAN SICKLE CONNECTOR**

SCH NO. 2006112070

June 2026

PREPARED BY LEAD AGENCY:

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1. INTRODUCTION

1.1 Background

The Conservancy prepared an Initial Study/Mitigated Negative Declaration (MND) for the South Tahoe Greenway Shared-Use Trail Project in 2011 (State Clearinghouse #2006112070). In 2021, the Conservancy and its partners renamed the South Tahoe Greenway Shared-Use Trail to the Dennis T. Machida Memorial Greenway (Greenway).

The 2011 MND analyzed the first 3.86-mile Greenway section from Sierra Boulevard to Van Sickle Bi-State Park. It was prepared for the California Tahoe Conservancy (Conservancy), the Tahoe Regional Planning Agency (TRPA), and the U.S. Forest Service, Lake Tahoe Basin Management Unit (LTMBU) to satisfy the requirements of the California Environmental Quality Act (CEQA), TRPA, and the National Environmental Policy Act (NEPA). It includes the following components:

- Draft Initial Study/Mitigated Declaration, Initial Environmental Checklist, and Environmental Assessment, with Appendix (June 2011)
- Final Mitigated Negative Declaration (September 2011)

On September 15, 2011, the Conservancy Board adopted the Final MND and Mitigation Monitoring and Reporting Program and approved the Greenway project. The Conservancy filed a Notice of Determination with the State Clearinghouse on September 18, 2011. On October 27, 2011, the TRPA Governing Board certified the adequacy of the IEC and approved the Greenway project.

This document is an Addendum to the approved MND for the Greenway prepared in compliance with CEQA. It does not supplement the evaluation from the 2011 document related to the TRPA Initial Environmental Checklist. In addition, as the proposed project modifications do not involve National Forest System Lands this Addendum provides no additional evaluation under NEPA.

1.2 Summary of Original Project and Addendum Purpose

As described in detail in Section 2.0 of the 2011 MND, the Greenway is a separated shared-use trail located in El Dorado County, California, largely within the boundaries of the City of South Lake Tahoe (City). The 3.86-mile Greenway, portions of which have already been built, will link Sierra Boulevard in the Sierra Tract neighborhood of the City to Van Sickle Bi-State Park (Park) at the California/Nevada state line.

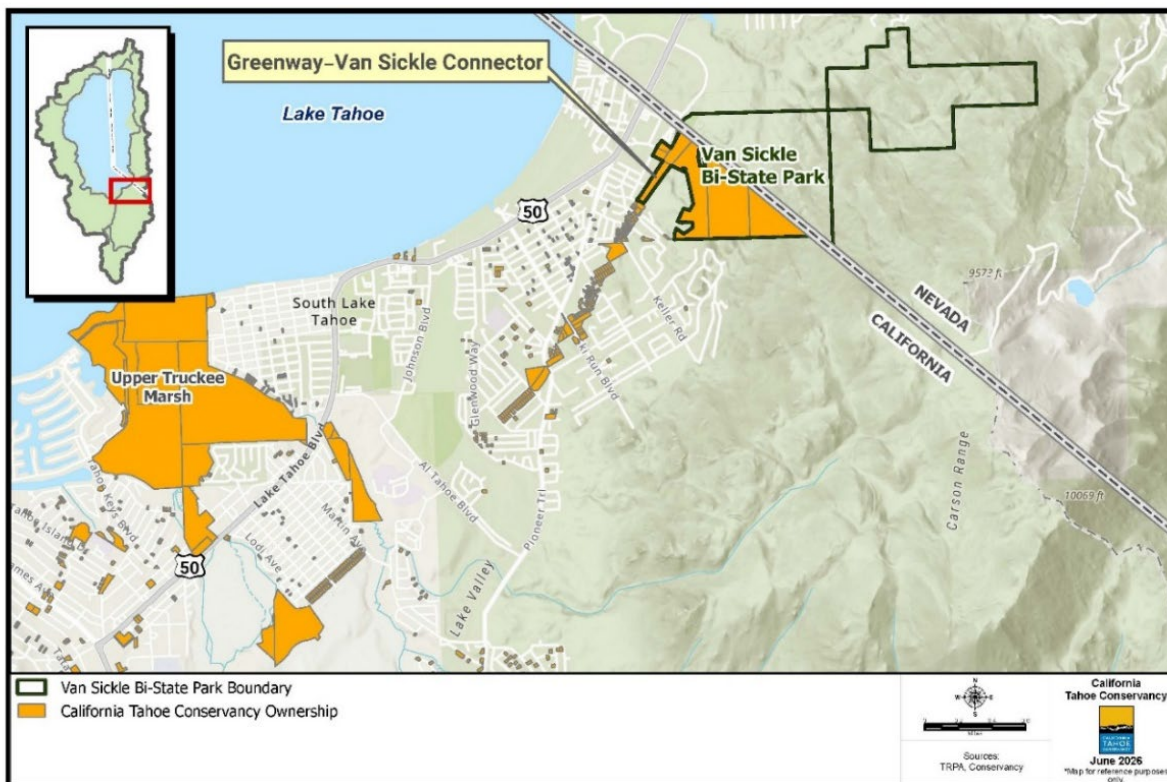
Since approval of the 2011 MND, the Conservancy has worked with partners to secure funds and advance project implementation. In October 2015, construction of Phase 1a was completed linking Herbert Avenue and Glenwood Way. In 2016, the Conservancy prepared a Supplement to the MND to examine certain project modifications to Greenway Phases 1b and 2, between Sierra Boulevard and Glenwood Way. Construction was completed on these phases in 2020. The City is actively planning Phase 1c.

The purpose of this Addendum is to address project modifications to the northern approximately 1/3 mile of the Greenway’s Phase 3 (also described as Segment 2-80 in Section 2.6.1.4 of the 2011 MND), which is located within the Park. This Greenway section extends from Chonokis Road to the Greenway’s terminus where it connects with the Park’s proposed shared-use trail. For purposes of this Addendum, it is referred to as the “Greenway–Van Sickle Connector” or the “Modified Project.” The project modifications are the result of experience gained through construction of prior Greenway phases and other shared-used trails in the Tahoe region and additional consultation with the Washoe Tribe, partners, the public, and other stakeholders. Certain modifications are also necessary to ensure compliance with the Americans with Disabilities Act (ADA). To maximize contracting and construction efficiencies the Conservancy intends to construct the Modified Project at the same time as the Van Sickle Bi-State Park Safety and Equitable Access Improvements Project (SCH # 2009042033) (Van Sickle Project).

1.3 Modified Project Location

The Greenway is located in El Dorado County, California, largely within the boundaries of the City. The Greenway–Van Sickle Connector is located within the Park, between Chonokis Road and the Park entrance, on El Dorado County Assessment Numbers 029-240-010 and 029-260-032. Both parcels are owned by the Conservancy. The surrounding vicinity includes the tourist core area, which consists of the Village Center commercial shopping center, Heavenly Village, the gondola base station, the casino core, hotels, motels, and residential areas. See **Figure 1**.

Figure 1: Greenway–Van Sickle Connector Location



1.4 Mitigation Measures from the 2011 MND

The following mitigation measures from the 2011 MND (as modified by the 2016 Supplement) are applicable to the Modified Project area and continue to be necessary to reduce potentially significant impacts to less than significant levels for the Modified Project evaluated in this Addendum. Minor modifications to update references have been made and are indicated in underline and ~~strikethrough~~:

BIO-1. Active Raptor and Migratory Bird Nest Site and Wildlife Nursery Site Protection Program

The Program shall include surveys, consultation, and protective actions. Pre-construction surveys, conducted during the nesting/breeding season immediately prior to initial project construction (e.g., excavation, grading and tree removal), shall be conducted to identify any active raptor or migratory bird nest sites and wildlife nursery sites within the project area. During initial construction activities (tree removal and excavation for the construction), a qualified biological monitor shall evaluate whether any raptors or migratory birds are occupying trees or whether any wildlife den/nursery sites are within the project area. The biological monitor shall have the authority to stop construction near occupied trees or nursery sites if it appears to be having a negative impact on nesting raptors or migratory birds or their young observed within the construction zone. If construction must be stopped, the monitor shall consult with TRPA staff within 24 hours (and LTBMU staff in locations on LTBMU lands) to determine appropriate actions to restart construction while reducing impacts to identified nursery sites, raptors or migratory bird nests.

BIO-2. Avoid Sensitive Plants or Prepare Sensitive Plant Protection Program

If pre-project surveys identify sensitive plant species, the Conservancy shall develop a Sensitive Plant Protection Program to mitigate impacts to LTBMU Sensitive, CNPS and TRPA Special Status Plant Species. Program features shall include:

Avoidance. Impacts to rare plant populations identified from the rare plant surveys shall be avoided where feasible by reconfiguring project design and fencing rare plant populations to prevent encroachment.

Identify, Select, and Restore or Purchase Mitigation Sites. If avoidance is not feasible, the Conservancy together with input from the TRPA, CDFW, and LTBMU when applicable shall identify opportunities for mitigation of sensitive plants impacts from Greenway construction and operation. Mitigation is not limited to but may include a single, or combination of the following items: restoration of degraded sensitive plant habitat owned by the Conservancy, purchase of mitigation sites, negotiation of conservation easements, or habitat restoration in off-site, degraded rare plant populations to compensate for unavoidable impacts.

Prepare a Special Status Plant Species Mitigation & Monitoring Plan. If avoidance is not feasible and the mitigation strategies identified above are employed, the Conservancy shall produce a mitigation and monitoring plan to follow the CNPS and ~~CDFG~~ CDFW guidelines to comply with Chapter 10 of ~~CDFG~~ CDFW Native Plant Protection Policy and TRPA Code Subsection ~~75.2.A~~ 61.3.6.C.1¹.

BIO-3. Wildlife Protection Program

Pre-construction surveys, conducted during the nesting/breeding season immediately prior to initial project construction (e.g., excavation, grading and tree removal), shall occur for the following species: mountain yellow-legged frog, California yellow warbler, willow flycatcher, northern goshawk, and California spotted owl. Surveys will be performed wherever construction activities will occur in suitable habitat as illustrated in Figure 27. Survey methods shall be approved by TRPA, and CTC and LTBMU (when occurring on LTBMU lands) prior to commencement of surveys. Survey methods shall follow the accepted regional protocol. Survey results shall be submitted for approval to the TRPA, CTC and LTBMU prior to construction activities. If sensitive wildlife species are found, project redesign shall occur to avoid these resources. During initial construction activities (i.e., tree removal and excavation for the construction), a qualified biological monitor shall be on-site to evaluate if construction activities disturb the identified wildlife resources. The biological monitor shall have the authority to suspend construction near known wildlife territories if such activities appear to cause a negative impact on nesting raptors or migratory birds or their young observed within the construction area. If construction is suspended, the monitor shall consult with TRPA and/or LTBMU staff, as appropriate, within 24 hours to determine appropriate actions to restart construction while reducing impacts to identified wildlife individuals, pairs or territories.

The following mitigation measure from the 2011 MND (as modified by the 2016 Supplement) is applicable to the Modified Project area. However, as described in Section 2.3 below, substitute mitigation measures will be applied to the Modified Project in place of CUL-1 as shown here.

CUL-1. Cultural Resource Monitoring Program

A qualified archaeological monitor shall be present during initial ground disturbing activities to identify previously unknown significant or potentially significant historical and archaeological resources that may be eligible for inclusion in the NRHP, the CRHR, or eligible for designation as a TRPA historical resource, and to identify any unanticipated or inadvertent impacts to known historical, tribal cultural, or archaeological resources. A qualified archaeological monitor shall be on-site during active construction and shall

¹ Mitigation Measure BIO-2 in the 2011 MND cited to TRPA Code Subsection 75.2.A. Organizational changes were made to the TRPA Code in 2012 and Subsection 75.2.A was renumbered. See *Code Amendments*, <https://www.trpa.gov/regional-plan/code-amendments>. The updated citation corresponds to the current TRPA Code provision.

inspect ground disturbing activities for the presence of cultural resources. The responsibilities of the archaeological monitor shall include: inspecting, documenting, and describing cultural material identified during monitoring; communicating with construction personnel; and notifying agencies (e.g., LTBMU, the SHPO, and TRPA) if previously unidentified historical or archaeological resources are encountered that may be eligible for inclusion in the NRHP, the CRHR or eligible for designation as a TRPA historical resource. Archaeological monitors shall have the authority to halt construction activities that have the potential to disturb significant historical or archaeological resources until appropriate measures can be implemented. Ground disturbing activities in the vicinity of the resource shall cease if the archaeological monitor determines that continuation of activity shall affect a significant historical or archaeological property, or if human remains are identified. If the archaeological monitor identifies cultural material but is unable to determine whether the resumption of the construction activity will affect historical or archaeological resources that may be eligible for listing, the monitor shall contact the appropriate agency official. Subsequent notification and consultation shall follow regulations pertaining to the evaluation of significance, assessment of effects, and consultation with the SHPO and the ACHP, as appropriate (36 CFR, part 800.4 through 800.9). Assessment of tribal cultural resources, if found, shall treat the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource (protecting the cultural character and integrity, traditional use, and confidentiality of the resource), and could include permanent conservation easements or other interests in real property for the purpose of preserving or utilizing the resource or place.

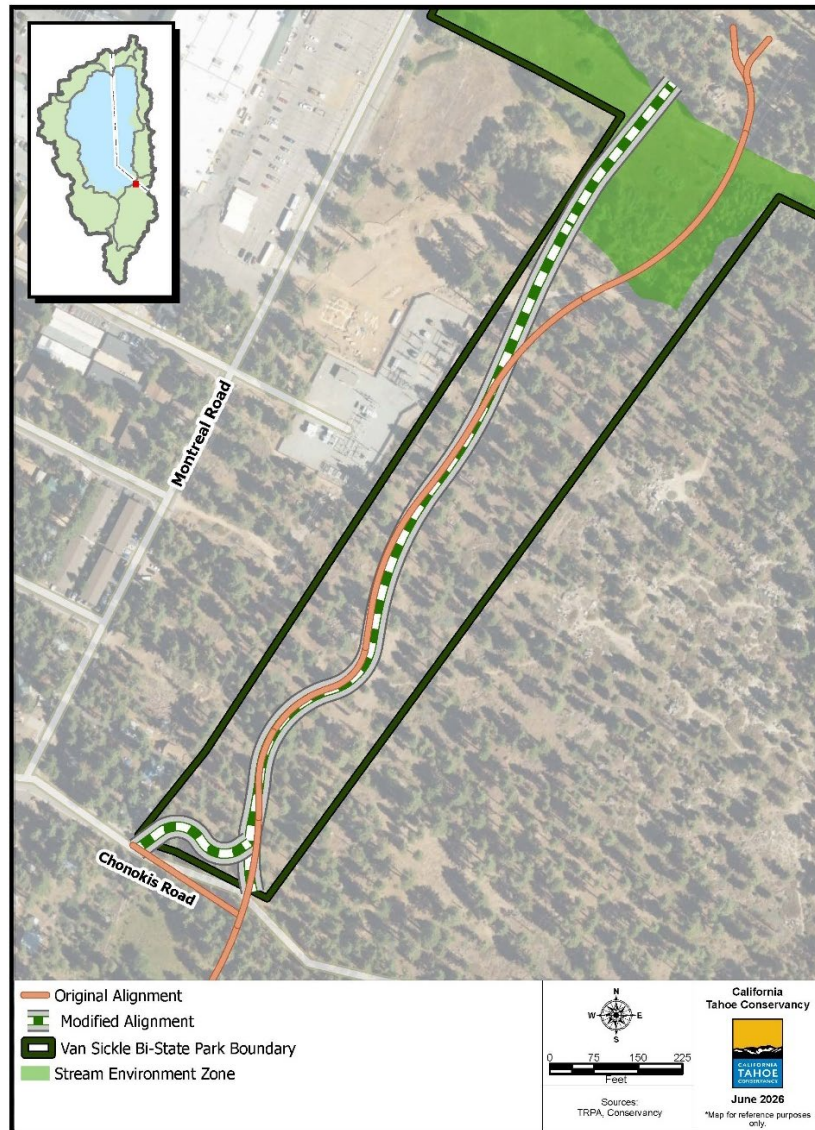
2. DESCRIPTION OF PROJECT MODIFICATIONS

The modifications examined in this Addendum include: (1) refinements to the trail alignment; (2) modifications to boardwalk width and footings; and (3) the replacement of mitigation measure CUL-1 from the 2011 MND with substitute mitigation measures. Except as expressly modified in this Addendum, the project features and standards described in Sections 2.6.2 (Project Design Features and Construction Controls), 2.6.3 (Revegetation and Restoration, Trail Decommissioning and Permanent Best Management Practices), and 2.6.5 (Regulatory Compliance Measures) continue to apply and are relied on in this Addendum to evaluate the Modified Project.

2.1 Trail Alignment and Connections

The original alignment for Phase 3 is described and depicted in Section 2.6.1.4 of the 2011 MND. **Figure 2** below shows the trail alignment as depicted in the 2011 MND and as modified by this Addendum.

Figure 2: Original Alignment and Modified Alignment for Greenway–Van Sickle Connector



Under the original alignment, the portion of Phase 3 between Chonokis Road and Van Sickle Bi-State Park was approximately 2,070 linear feet in length. This included 10-foot-wide asphalt trail on high capability land and 12-foot-wide boardwalks in two stream environment zone (SEZ) areas: (1) a 180-linear-foot boardwalk northeast of Chonokis Road, and (2) a 320-linear-foot boardwalk across the meadow south of the entrance to Van Sickle Bi-State Park (500 feet of boardwalk in total). It also included a 219-linear-feet, 8-foot-wide asphalt neighborhood connector trail to Chonokis Road.

The modified alignment for the for the Greenway–Van Sickle Connector completes the connection between Chonokis Road and the Van Sickle Bi-State Park in approximately 1,830 linear feet. Of this, approximately 1,550 linear feet will be 10-foot wide asphalt trail on high capability land, with 2-foot shoulders and 2-foot clear zones on each side. Approximately 280 linear feet will be a 13-foot-wide boardwalk to cross the SEZ near the entrance to Van Sickle Bi-

State Park. TRPA completed an updated Land Capability Verification in 2026 and determined that the area northeast of Chonokis Road is not SEZ; accordingly, that portion of trail will be asphalt rather than the boardwalk shown in the 2011 MND. The modified alignment represents reductions of approximately 25 percent of asphalt trail and 12.5 percent of boardwalk, respectively, as compared to the 2011 approved project.

As the trail approaches the meadow south of the entrance to Van Sickle Bi-State Park, the modified alignment traverses AN 029-240-10 and onto 029-260-32 to the west of the original alignment, closer to the Liberty Utilities substation and Montreal Road, and will connect with the new shared-use trail that is proposed as part of the Van Sickle Bi-State Park Safety and Equitable Access Improvements Project. This modification reduces the length of trail in SEZ, as noted above. It also avoids conflicts between the construction equipment that will be utilized in boardwalk construction and the Liberty Utilities overhead power lines that run from the substation through Van Sickle Bi-State Park. The modified alignment will pass through the power line easement in one location but Liberty Utilities has agreed this is permissible and would not require the relocation of its electric power facilities.

The modified alignment also differs from the original alignment at the connection to Chonokis Road. The original alignment for the neighborhood connector was entirely within the City right-of-way. Modifications to this alignment are shown in **Figure 2** above and are necessary to meet ADA accessibility requirements and to minimize encroachment into the City right-of-way.

The original alignment would have required removal of approximately 53 total trees, including approximately 3 trees greater than 30-inches diameter at breast height (dbh), 43 trees between 30 and 14 inches dbh, and 7 trees less than 14 inches dbh (2011 MND, Appendix C). The modified alignment will require removal of approximately 31 total trees, including approximately 3 trees greater than 30 inches dbh, 23 trees between 30 and 14 inches dbh, and 5 trees less than 14 inches dbh. This includes trees that are located within the footprint of the trail and trees that may need to be removed for excavation associated with retaining walls, improved sight lines and to avoid hazard in high traffic areas, and to reduce the potential for roots to cause trail damage.

As required by regulatory compliance measure (CM)-7 in Section 2.6.5.7 of the 2011 MND, the Conservancy will complete a detailed tree survey prior to completion of final construction drawings to identify the precise number, size, and species of trees to be removed. The Conservancy will avoid removing trees, particularly those larger than 30 inches dbh, to the maximum extent feasible while still meeting ADA accessibility requirements and minimizing SEZ encroachment. Tree evaluation and protection measures will follow CM-7 and the standards in the TRPA Code of Ordinances (TRPA Code). Tree removal will be done in accordance with TRPA Code Section 61.1. TRPA Code Section 61.3.7.A.6 states that trees larger than 30 inches dbh in the westside forest types may be removed for Environmental Improvement Program (EIP) Projects when it is demonstrated that the removal is necessary for the activity. This is a change from the regulatory requirements described in the 2011 MND and that were reflected in CM-21. Accordingly, and because the Greenway is an EIP Project, CM-21 will not apply to the Modified

Project. Removal work will be conducted in accordance with TRPA Code Section 61.1.6., including subsection C regarding tree removal within SEZ areas.

As with the original trail alignment analyzed in the 2011 MND, the modified alignment will require relocation of multiple boulders/rock outcrops, ranging in size from two to four feet in diameter.

2.2 Boardwalk Width and Footings

The 2011 MND provided for the use of 12-foot-wide boardwalks in SEZ areas that exhibit signs of surface water flow or thick meadow grass, including for the SEZ southwest of the entrance to Van Sickle Bi-State Park. The boardwalks were to be supported by helical pier footings, which were thought to minimize ground disturbance. The Modified Project makes two changes to boardwalk design. First, the boardwalk will be 13 feet wide rather than 12 feet wide. A wider boardwalk is consistent with the boardwalks constructed in earlier Greenway phases and provides additional space to safely allow for bi-directional, mixed-use traffic.

Second, the Modified Project will use hollow steel pier footings to support the boardwalk, rather than helical pier footings. Since 2011, construction of other shared-use paths and boardwalks in the region has demonstrated that helical pier footings are more costly and time intensive to install and involve a larger area of ground disturbance than anticipated. This is largely due to the additional battered (angled) helical piers that were determined necessary for horizontal stability and the difficulty of installing them correctly. Therefore, the Modified Project would use hollow steel piers footings for the boardwalk that do not require battered piers. **Figure 3** is a photo of a hollow steel pier footing used for El Dorado County’s San Bernadino Class 1 Bike Trail Project.

Figure 3. Hollow Steel Pier Footing



It is anticipated that steel piers will be 14 inches in diameter and a pair will be installed approximately every 20 feet; however, the precise sizing, spacing, material, and maximum depth of embedment will be determined upon completion of a geotechnical investigation and structural design, and will be based on specific geotechnical conditions and the design targets for structural loading. H10 loading requirements are anticipated to support emergency vehicles.

2.3 Cultural Resources and Tribal Cultural Resources

The 2011 MND and 2016 Supplement included mitigation measure CUL-1, reprinted above in Section 1.4. CUL-1 required a qualified archeological monitor to be present during initial ground disturbing activities to identify previously unknown significant or potentially significant historical and archeological resources, and to identify unanticipated or inadvertent impacts to known historical, tribal cultural, or archeological resources. It also described the responsibilities of the archeological monitor and what would happen if continuation of activity could affect a historical, tribal cultural, or archeological resource, and that assessment of tribal cultural resources would treat the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource.

For the Modified Project, this Addendum replaces CUL-1 from the 2011 MND with the four mitigation measures below: CUL-1, CUL-2, TCR-1, and TCR-2. The substitute measures reflect ongoing coordination with the Washoe Tribe of Nevada and California (Washoe Tribe) regarding the protection of tribal cultural resources and align with the cultural resources mitigation program for the Van Sickle Project. As noted above, the Conservancy intends to undertake construction of the Modified Project at the same time as the Van Sickle Project. Although Assembly Bill (AB) 52 consultation requirements do not apply an addendum, the Conservancy engaged with the Washoe Tribe about the Modified Project's proposed improvements during consultation on the Van Sickle Project.

CUL-1: Conduct Archaeological Resources Surveys and Avoid Archaeological Resources

Prior to the start of construction, a member of the Washoe Tribe, or their designee, and a qualified archeologist who meets the U.S. Secretary of the Interior Professional Qualifications Standards for Archaeology shall perform archeological resources surveys for any portion of the Modified Project site not yet surveyed. The Conservancy shall be responsible for ensuring that archeological resources surveys have been conducted for the entire Modified Project area. For the purposes of this mitigation measure, any archaeological resources discovered during such surveys shall be assumed to be unique archaeological resources or historical resources as defined by State CEQA Guidelines Section 15064.5 and will be recorded by a qualified archaeologist on a California Department of Parks and Recreation DPR 523 primary form or equivalent documentation. Each such resource will be indicated, such as via a GPS device, through Environmentally Sensitive Area (ESA) mapping, with flagging tape, safety fencing, and/or signage designating it as an ESA to ensure that construction crews and heavy equipment will not intrude on these sites during construction. If an archaeological resource is determined by

the Washoe Tribe to be a Washoe Tribe cultural resource, the Tribe shall determine appropriate actions necessary to protect the resource. At the discretion of the Conservancy, or of the Washoe Tribe if the resource is a tribal cultural resource, monitoring may be done in lieu of or in addition to marking. If it is determined that the Modified Project cannot avoid impacts on one or more of the sites, then the Conservancy shall work with a qualified archaeologist, or the Washoe Tribe if the resource is a tribal cultural resource, to identify appropriate actions which may include avoidance by preservation-in-place, interpretation, or an excavation plan.

CUL-2: Halt Ground Disturbance Upon Discovery of Subsurface Archaeological Features

If archaeological materials (e.g., locally darkened soils [i.e., midden], stone tools, chipped stone, baked clay, or concentrations of shell, bone, charcoal, glass, metal, or ceramics) are inadvertently discovered during ground disturbing activities, the contractor shall cease all work within 100 feet (30.5 meters) of the find and the Conservancy shall immediately retain the services of a qualified professional archaeologist. Because the archaeological materials may also be tribal cultural resources, the Conservancy will also implement MM-TCR-2 upon discovery. At that time, the Conservancy shall coordinate any necessary investigation of the site with the archaeologist as needed to evaluate the significance of the resource per PRC Sections 5024.1 and 21083.2(g) and provide proper management recommendations. Possible management recommendations for significant resources could include resource avoidance or data recovery excavations. The Conservancy shall implement any measures deemed necessary by the archeologist and/or the Washoe Tribe for the protection of the cultural resources. The Conservancy shall instruct the contractor to not to resume work in the area of the discovery until directed to do so.

TCR-1: Retain a Tribal Monitor for Ground Disturbance Activities

The Conservancy shall contact the Washoe Tribe at least one month prior to project ground-disturbing activities to retain the services of the Washoe Tribe, or its designee, for Tribal monitoring during ground-disturbing activities. The duration of the construction schedule and Tribal Monitoring shall be determined at this time. The Conservancy shall contact the tribal representative a minimum of 7 days before beginning earthwork or other ground-disturbing activities. The tribal monitor will be invited to be present on-site during all construction phases that involve ground-disturbing activities, including tree removal, boring, excavation, drilling, and trenching. In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving proper notice, activities may proceed without monitoring, and construction workers shall comply with MM-CUL-2 and MM-TCR-2 if any potential resources are observed. Should the tribal monitor be present the Conservancy may request copies of complete daily monitoring logs from the Tribal Historical Preservation Office that provide details on each day's activities, including construction activities, locations, soil, and any cultural materials identified. However, it will be at the discretion of the Tribal Historic Preservation Office to determine what information related to cultural materials from the daily logs may be shared. The on-site

monitoring shall end when the site grading and excavation activities are completed or when the Washoe Tribe has indicated, in writing, that the site has a low potential for affecting Tribal cultural resources.

TCR-2: Unanticipated Discovery of Tribal Cultural Resources

During ground-disturbing construction activities, if any suspected Tribal Cultural resources or resources of cultural significance to the Washoe Tribe, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed-upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist who meets the secretary of the Interior's professional qualifications. The Conservancy shall implement any measures deemed necessary by the Washoe Tribe for the protection of the tribal cultural resource, with preservation in place being the preferred treatment. The contractor shall not resume work in the area of the discovery until directed to do so by the Conservancy, in coordination with the Washoe Tribe.

3. RATIONALE FOR ADDENDUM AND FRAMEWORK FOR EVALUATION OF PROJECT MODIFICATIONS

The Conservancy prepared this Addendum to address the project changes identified above. The preparation of an addendum is appropriate pursuant to CEQA Guidelines section 15164.

CEQA Guidelines sections 15162 and 15164 allow a lead or responsible agency to prepare an addendum to a previously adopted MND if minor technical changes or additions are necessary, but none of the following occurs:

1. Substantial changes are proposed in the project, which will require major revisions to the MND due to the involvement of new significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions to the previous MND due to involvement of new significant environmental effects or substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted, shows any of the following:
 - a. The project will have one or more significant effect not discussed in the MND;
 - b. Significant effects previously examined will be substantially more severe than shown;

- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or
- d. Mitigation measures or alternatives, which are considerably different from those analyzed in the previous MND, would substantially reduce one or more significant effect on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

The changes in environmental impacts due to modifications in the project or changed conditions have been evaluated and measured against the standards set forth in paragraphs 1, 2, and 3 above. The environmental analysis is provided in Section 4.

4. ENVIRONMENTAL ANALYSIS

This section evaluates whether the changes identified above would result in new or substantially more severe environmental impacts than described in the MND.

4.1 Aesthetics

The original MND found that the project would result in less than significant impacts or no impact on aesthetics, including visual character, scenic vistas, and light and glare. The trail realignment will bring the trail closer to Montreal Road but will not result in a significant change in visual conditions. The project changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2011 MND. Mitigation measures SCENIC-1, SCENIC-2, SCENIC-3, and SCENIC-4 do not apply to the Modified Project Area. All impacts related to aesthetics would remain less than significant or no impact.

4.2 Agriculture and Forestry Resources

The project modifications do not require revisions to the evaluation of Agricultural and Forest Resources. The location of the Modified Project is nearly the same as that that evaluated in the 2011 MND, and there are no agricultural and forest resources in the Modified Project area that would be impacted by the updated trail alignment. The project changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects for agricultural and forest resources than previously addressed in the 2011 MND. All impacts related to agricultural and forest resources would remain less than significant or no impact.

4.3 Air Quality

As the construction equipment and duration would remain essentially the same as that evaluated in the 2011 MND, the project changes would not result in new significant environmental effects

or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2011 MND. The project would continue to incorporate all applicable regulatory compliance measures. All impacts to air quality would remain less than significant.

4.4 Biological Resources

- *Would the Greenway have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Special status plant and wildlife species in the Greenway area were discussed in the 2011 1 (p. 3-40 to 3-58, including Tables 12 & 13), and potentially suitable habitat for special status species (mountain yellow-legged frog, yellow warbler, willow flycatcher, forest carnivores, northern goshawk, and spotted owl) was mapped in Figure 27 (p. 3-42). Site surveys and database searches identified no presence for any of these species. Because of the presence of suitable habitat and the potential for species occurrence in the future, the 2011 MND included two mitigation measures to reduce the potential for impacts to less than significant levels: BIO-1 (Active Raptor and Migratory Bird Nest Site and Wildlife Nursery Site Protection Program) and BIO-3 (Wildlife Protection Program). These mitigation measures require pre-construction surveys to determine species presence/absence and project redesign and/or construction rescheduling to avoid disturbance.

As shown on Figure 27, the Modified Project area contains potentially suitable habitat for yellow warbler, forest carnivores, northern goshawk, and spotted owl. The Modified Project's trail realignment is in close proximity to and substantially the same habitat as the 2011 approved project, which creates the potential for impacts to the same wildlife species identified in the 2011 MND. The alignment and design modifications described in this Addendum will not create changes in habitat quality or quantity materially different than described in the 2011 MND. The Modified Project is in an urban area that has significant human disturbance and noise. Due to existing land uses and disturbances within and adjacent to the Modified Project area, it is not expected to support breeding habitat suitable for sensitive wildlife species. Additionally, the Modified Project is not located within nest buffers or disturbance/threshold zones for TRPA special interest wildlife species. Therefore, implementation of the Modified Project is not expected to cause a substantial direct or indirect effect on special-status wildlife species. However, as provided by the 2011 MND due to the presence of suitable habitat, mitigation will be applied to ensure no significant impacts. Pre-construction surveys will be conducted as required by mitigation measures BIO-1 and BIO-3, and if species are detected the Modified Project will be redesigned or rescheduled as specified.

With respect to sensitive plant species, the 2011 MND identified suitable habitat in the upland and SEZ habitat zones for Galena Creek rock cress (*Arabis rigidissima* var. *demota*), *Botrychium*, sp., Shore sedge (*Carex limosa*), Oregon fireweed (*Epilobium oregonum*), Mees's Moss (*Meesia triquetra*), and Water bulrush (*Scirpus subterminalis*). No presence for these species was found

(p. 3-76). The 2011 MND concluded there was the potential for a significant impact if sensitive species colonized the project area prior to construction, and required mitigation measure BIO-2 to conduct pre-construction surveys for sensitive plant species and establish performance criteria to avoid and/or mitigate and monitor plant populations. The Modified Project reduces the overall length of the trail by 240 linear feet in both SEZ and upland areas. However, there is still the potential for disturbance if sensitive species colonize the Modified Project area. Mitigation measure BIO-2 remains required to reduce the potential for significant impacts to less than significant levels.

The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of effects on candidate, sensitive, or special status species previously addressed in the 2011 MND. With the incorporation of the planned mitigation measures, potential impacts would remain less than significant.

- *Would the Greenway have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?*

The project area contains SEZ, a sensitive natural community defined by TRPA as lands influenced by the presence of surface or groundwater. SEZ areas encompass riparian habitat and open meadow, among others. The 2011 MND evaluated the project disturbance within these habitat types and the TRPA and Lahontan Regional Water Quality Control Board (Lahontan) offsetting restoration requirements included as part of the project in the Project Description. The evaluation concluded that the required restoration offsets avoided the potential for significant impacts and no additional mitigation was required.

The 2011 MND analyzed potential impacts to two SEZs within the Modified Project area, an SEZ northeast of Chonokis Road and the meadow south of the entrance to Van Sickle Bi-State Park. The original project proposed a 180-linear-foot boardwalk for the SEZ northeast of Chonokis Road and a 320-linear-foot boardwalk south of the Park entrance. TRPA completed an updated Land Capability Verification for the Modified Project Area in 2026. The updated Land Capability Verification confirmed that the meadow south of the entrance to the Park is SEZ, but that the SEZ area northeast of Chonokis Road is not SEZ.

The Modified Project includes approximately 280 linear feet of boardwalk supported by hollow steel piers to cross the meadow/SEZ south of the Park entrance. Assuming that a pair of piers will be installed every twenty feet, this will result in approximately 30 square feet of direct permanent encroachment/disturbance in SEZ. As noted in the Modified Project description, there will no longer be a boardwalk northeast of Chonokis Road due to the updated Land Capability Verification.

Since 2011, TRPA and Lahontan have adopted updates to their regulatory plans.

- The TRPA Code Section 30.4.6.D.3 provides an exemption from the general SEZ disturbance prohibitions for shared use trail projects which meet certain criteria. The Greenway, including the Modified Project analyzed in this Addendum, is exempt from providing offsetting restoration from SEZ under current TRPA requirements.
- Lahontan requires disturbance in SEZ meeting certain criteria to be offset with SEZ restoration at a ratio of 1.5 to 1. This results in 45 square feet of SEZ offsetting restoration required for the 30 square feet of direct impacts from the piers. Additionally, Lahontan requires 1/3 of the square footage of the boardwalk decking surface area to be offset. The estimated boardwalk dimensions are 280 feet long and 13 feet wide, which is 3,640 square feet. One third of this deck area is 1,213 square feet. Offsetting this impact at a ratio of 1.5 to 1 requires 1,820 square feet of additional SEZ restoration credit. In total, the Modified Project requires an estimated 1,865 square feet of SEZ restoration credit.

Compliance with Lahontan's restoration requirements avoids the potential for significant impacts to a riparian habitat or other sensitive natural community. Similar to the original project, the Modified Project's impacts to riparian habitats remain less than significant.

- *Would the Greenway have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The U.S. Army Corps of Engineers (USACE) regulates activities in wetlands and waters of the U.S. in accordance with Section 404 of the Clean Water Act. The 2011 MND found a total of 3.73 acres of potential jurisdictional 404 wetlands within the entire project area, based on the preliminary wetland delineation (see Appendix G to the MND). In Table 16 (p. 3-68) the MND evaluated potential project impacts and offsetting mitigation requirements for disturbance from installation of the shared-use trail. Within the area between Chonokis Road and the entrance to Van Sickle Bi-State Park, the delineation shows potential Section 404 riparian wetland and montane mesic meadow just south of the Park entrance.

The Modified Project's boardwalk crosses the same potential Section 404 riparian wetland and montane mesic meadow features shown in the 2011 MND's preliminary wetland delineation. Although it is anticipated that construction impacts will be reduced, each hollow steel footing will have a larger area of permanent disturbance than the helical pier footings analyzed in the 2011 MND. The current definition of waters of the U.S. requires that jurisdictional wetlands be adjacent to and have a continuous surface connection with a Water of the U.S. The potential riparian wetland and montane mesic meadow features are drained by an intermittent channel that flows through the meadow complex and drains to the west. This channel may provide adjacency to a downstream water of the U.S. In November 2025, the U.S. EPA and USACE released a proposed rule that would further revise the definition of waters of the U.S. if adopted.

CM-20 in the 2011 MND states: “The Conservancy will, before construction of the Greenway, complete a jurisdictional wetlands delineation to determine the location of jurisdictional wetlands and waters of the U.S. within the project area. Design measures will avoid or minimize impacts to delineated wetlands and waters of the U.S. to the extent possible as determined by the USACE and Lahontan. If development within the delineated wetlands cannot be avoided, and if disturbance quantities rise to the minimum level, a Section 404 permit shall be obtained from the USACE as well as a water quality certification (Section 401) from Lahontan. The Conservancy shall comply with requirements of the permits to mitigate the specific impacts of the Greenway.”

For the Modified Project the Conservancy will consult with USACE to determine whether CM-20 is applicable. The Conservancy shall comply with CM-20 and/or all applicable permitting requirements as directed by USACE, including any required offsetting restoration.

With applicable regulatory compliance measures, the Modified Project’s impacts on federally protected wetlands will remain less than significant.

- *Would the Greenway 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?*

The 2011 MND concluded that project design details avoided creating barriers to movement for fish or wildlife species, and impacts would be less than significant. The design and alignment modifications of the Modified Project do not alter the evaluation of effects on wildlife movement compared to the 2011 project.

The 2011 IS/IEC identified the potential for project construction to result in direct removal of active nests or abandonment of nesting or brooding sites for migratory birds and/or raptors. Additionally, construction could result in direct removal of nursery sites or their abandonment. (IS/IEC/EA, p. 3-70) The 2011 MND required MM BIO-1 (Active Raptor and Migratory Bird Nest Site and Wildlife Nursery Site Protection Program) to reduce the potential for significant impacts to less than significant levels. With MM-BIO-1 the impacts of the Modified Project would remain less than significant.

- *Would the Greenway conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?*

TRPA maintains goals and policies related to vegetation, wildlife, fisheries and SEZ in the Regional Plan Goals and Policies document. Table 17 in the 2011 IS/IEC/EA (p. 3-71) provides evaluation of project proposals related to the Goals and Policies. That evaluation concluded the Greenway project, by avoiding sensitive lands and vegetation where possible and providing offsetting measures as required, produced less than significant impacts. The changes described in this Addendum do not alter that determination.

Since project approval in 2011, TRPA code requirements related to tree removal and forest health have been amended. Per TRPA Code section 61.3.7. *Old Growth Enhancement and Protection*, within lands classified by TRPA as conservation or recreation land use, any live, dead, or dying tree larger than 30 inches dbh in westside forest types shall not be cut. However, as noted under 61.3.7(A)(6) *EIP Projects*, trees larger than 30 inches dbh in the westside forest types may be removed when it is demonstrated that the removal is necessary for the activity. The Greenway is an EIP project.

Similar to the original project, approximately 3 trees greater than 30 inches dbh would be removed to construct the Modified Project's proposed trail. Trees greater than 30 inches dbh are considered old growth under the TRPA Code. The Modified Project has been designed to retain desirable trees, including trees larger than 30 inches dbh, and blend in with the natural environment to the largest extent feasible. Pursuant to CM-7 the Conservancy will complete a detailed tree survey prior to completion of final construction drawings to identify the precise number, size, and species of trees to be removed. The Conservancy will avoid removing trees, particularly those larger than 30 inches dbh, to the maximum extent feasible while still meeting ADA accessibility requirements and minimizing SEZ encroachment. Tree evaluation and protection measures will follow CM-7 and the standards in the TRPA Code, and tree removal will be done in accordance with TRPA Code Section 61.1. There is no practical alternative that would eliminate the removal of approximately 3 trees greater than 30 inches dbh. As such, the 2011 MND's conclusion of less than significant impacts remains valid for the Modified Project.

- *Would the Greenway conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No such plans exist for the Modified Project area. Therefore, no potential for conflicts exists.

4.5 Cultural Resources/Tribal Cultural Resources

The 2011 MND described the existing cultural resource setting of the Greenway travel corridor within the former Caltrans freeway right-of-way project area and presented evaluation of the potential for significant impact. (IS/IEC/EA, p. 3-87.) The evaluation concluded the Greenway would not impact known resources, but is located near known resources and therefore could unearth unknown historic or archeological resources during construction. Mitigation Measure CUL-1 was required to reduce potential impacts to unknown historic and archeological resources. CUL-1 in the 2011 MND required archaeological monitoring during ground disturbing activities to identify, evaluate, and protect unknown historic and archeological resources.

In 2015, after the preparation of the 2011 MND, AB 52 was enacted requiring lead agencies to engage in meaningful consultation with California Native American Tribes regarding potential impacts to tribal cultural resources, and requiring the Governor's Office of Planning and Research to update the CEQA initial study checklist to separate consideration of paleontological resources

and tribal cultural resources. The 2016 Supplement modified CUL-1 to reflect changes from AB 52.

None of the sites from the 2011 MND are located within the Modified Project area. There are no changes to the site conditions or ground-disturbing activities that would result in increased impacts on historical, archaeological, or tribal cultural resources or the potential for disturbing human remains from the Modified Project as compared to the original project. As discussed above in Section 2.3, this Addendum replaces CUL-1 from the 2011 MND with mitigation measures CUL-1, CUL-2, TCR -1, and TCR-2. These substitute mitigation measures do not alter the nature or severity of the original potentially significant impact, which remains limited to the potential discovery of unknown resources. However, the way in which monitoring will be conducted during ground disturbing activities has been modified to reflect coordination with the Washoe Tribe in 2024 and 2025 and to ensure effectiveness by aligning with the cultural and tribal cultural resource mitigation measures applicable to the Van Sickle Project. This provides a practicable path for project implementation while maintaining the intent and effectiveness of the original mitigation. As such, impacts remain less than significant with mitigation, consistent with the original ISMND, and no additional environmental review is required.

4.6 Geology or Soils

The project modifications do not require substantial revisions to the evaluation of geology and soils. The evaluation concluded that project design features and construction control reduce the impacts to less than significance. There are no changes to the risks associated with faults, ground shaking, liquefaction, landslides, expansive soils, or septic systems based on the same geologic setting. The modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2011 MND. All impacts related to geology and soils would remain less than significant or have no impact.

4.7 Greenhouse Gas Emissions

The 2011 MND concluded that the original project produced less than significant impacts during construction and operations and helped to implement plans intended to reduce greenhouse gases. The project modifications do not require revisions to the evaluation of greenhouse gas emissions. The intensity and duration of construction would be essentially unchanged. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects for greenhouse gas emissions than previously addressed. All impacts related to greenhouse gases would remain less than significant or no impact.

4.8 Hazards and Hazardous Materials

The Modified Project does not require revisions to the evaluation of hazards and hazardous materials. The modified trail alignment is shorter than that of the original project, but the overall

intensity and duration of construction and types of materials to be utilized would be substantially unchanged from that evaluated in the 2011 MND. The construction controls that require storage of construction materials in a protected staging area away from SEZ, and that establish construction limits for use of heavy equipment, address the potential for accidental discharge in a manner equal to that described for the approved project. No increased potential for accidental release of hazardous materials exists and the evaluation of the 2011 MND remains valid. All impacts related to hazards and hazardous materials would remain less than significant or no impact.

4.9 Hydrology and Water Quality

The project modifications do not require substantial revisions to the evaluation of hydrology and water quality. The 2011 MND determined that impacts would be less than significant or have no impact, as the project would not violate water quality standards or waste discharge requirements, nor would it deplete groundwater supplies or interfere with groundwater discharge. Federal, regional, State, and/or local regulations for project permitting and approval are reflected in the project features, including construction compliance measures incorporated into the project description. These project features avoid, reduce, and minimize potential effects to surface water quality.

The change in project design to use hollow steel footings instead of helical piers will result in a greater amount of ground disturbance for footings construction than anticipated by the 2011 MND. Excavation for these footings will likely encounter groundwater. However, as described in the MND, implementation of CM-4 assures compliance with Lahontan requirements for disposal of groundwater during construction. Depending on final engineering design, the project will submit a dewatering plan as part of the SWPPP for NPDES construction permitting. Dewatering plans identify actions to be taken should unexpected groundwater interception occur during construction. Proper planning and implementation of the dewatering plan minimizes the risk of discharge of contaminants to groundwater or alteration of groundwater movement during construction. These measures remain adequate to reduce the potential for direct and indirect water quality degradation during construction.

Further, the project would not substantially alter existing drainage patterns or alter the course or flow of 100-year flood waters or contribute to added sources of polluted runoff or runoff water which could exceed the capacity of existing or planned stormwater drainage system. The Modified Project's alignment is 240 linear feet shorter than that of the original approved project, including a reduction of 220 feet in SEZ. The project design features related to trail drainage are the same for the Modified Project as those evaluated in the 2011 MND. All impacts related to hydrology and water quality would remain less than significant or no impact.

4.10 Land Use and Planning

The Modified Project does not require revisions to the evaluation of environmental resources related to land use and planning. The modified trail alignment would not physically divide an

established community or conflict with the Lake Tahoe Regional Plan. All impacts related to land use and planning would remain less than significant or no impact.

4.11 Mineral Resources

The Modified Project does not require revisions to the evaluation of mineral resources. The Modified Project area contains no mineral resource areas. There remains no impact.

4.12 Noise

The 2011 MND concluded that the project would result in less-than-significant noise impacts, including short-term construction noise and groundborne vibration. While the trail alignment of the Modified Project is 240 feet shorter than the 2011 approved project, the intensity and duration of construction would be substantially the same as evaluated in the 2011 MND. Construction will be undertaken during daytime hours, consistent with local noise ordinance requirements. All impacts related to noise would remain less than significant.

4.13 Population and Housing

The Modified Project does not require revisions to the evaluation of environmental resources related to population and housing. The Modified Project would not displace existing housing or people. Impacts remain less than significant or no impact.

4.14 Public Services

The Modified Project does not require revisions to the evaluation of public services. The Modified Project would not increase the need for public services as compared to the original project. Mitigation Measure PS-1 from the 2011 MND does not apply to the Modified Project. Impacts remain less than significant or no impact.

4.15 Recreation

The Modified Project does not require revisions to the evaluation of developed recreation facilities. It will not result in new significant environmental effects or a substantial increase in the severity of effects for recreation previously addressed. Impacts remain less than significant.

4.16 Transportation/Traffic

The Modified Project does not require revisions to the evaluation of transportation, VMT, or traffic. The Greenway will continue to create an alternative transportation trail for pedestrians and non-motorized transportation. The Modified Project includes changes in the alignment to ensure ADA compliance, which will improve the Greenway's safety and accessibility for all types of users. Mitigation Measure TRAFFIC-1 from the 2011 MND does not apply to the Modified Project. Impacts remain less than significant or no impact.

4.17 Utilities and Service Systems

The Modified Project does not require revisions to the evaluation of utilities and service systems. The trail alignment was modified in part to avoid potential conflicts with Liberty Utility overhead electrical lines and poles and will not require any poles or lines to be relocated or other impacts to electrical facilities. Impacts remain less than significant or no impact.

4.18 Mandatory Findings of Significance

This Addendum concludes that the Modified Project is not likely to cause a substantial change in impacts and would not result in new significant impacts relative to the previously adopted 2011 MND, and that mitigation measures are available to reduce those potentially significant impacts to levels of less than significance. The following mitigation measures will be applied to the Modified Project: MM-BIO 1, MM-BIO-2, MM-BIO-3, CUL-1, CUL-2, TCR-1, and TCR-2.

The project changes would not result in new significant environmental effects or a substantial increase in the severity of effects related to the mandatory findings of significance previously addressed in the 2011 MND.

5. CONCLUSION

None of the conditions described in Section 1162 of the CEQA Guidelines apply to the Modified Project, and the proposed project changes necessitate only minor technical changes or additions to the previously adopted MND. Therefore, preparation of this Addendum provides the appropriate level of environmental review pursuant to CEQA.