

From: Laura Patten <Laura@keptahoebblue.org>
Sent: 5/21/2024 2:47:00 PM
To: Public Comment <PublicComment@trpa.gov>
Cc: jesse@keptahoebblue.org <jesse@keptahoebblue.org>; DarcieGoodman-Collins <Darcie@keptahoebblue.org>;
Subject: Comments from the League on Governing Board Item IX.A: Environmental Threshold Carrying Capacities
Attachments: [image001.png](#), [2024.05.21_ThresholdsCommentsTRPA.pdf](#)

Good afternoon,

Please accept the attached comments on behalf of the League to Save Lake Tahoe referring to Governing Board Item IX.A: Environmental Threshold Carrying Capacities.

Thank you,
Laura

Laura Patten

Natural Resource Director, League to Save Lake Tahoe

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Tahoe Regional Planning Agency
Governing Board Chair and Members
128 Market St., Stateline, NV 89410
Submitted via email

Re: Item IX.A: Support of Proposed Revisions to Environmental Threshold Carrying Capacities and Need for Updated Threshold Standards to Address New and Emerging Threats

Dear Governing Board Chair and Members,

The purpose of this letter is to provide the League to Save Lake Tahoe's (League) support for the approval of the required findings and adoption of the following thresholds: stream environment zone (SEZ) restoration, aquatic invasive species control, and Tahoe yellow cress conservation and to request that TRPA prioritize updating thresholds, which are mostly out of date and haven't been updated since 1982. The League is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we advocate for projects that protect Lake Tahoe's fragile ecosystem and achieve and maintain environmental thresholds.

The Bi-State Compact, as revised in 1980, gave TRPA authority to adopt environmental quality standards, called thresholds, and to enforce ordinances, rules, and regulations designed to achieve the thresholds. The TRPA Governing Board adopted these thresholds in 1982. These nine environmental thresholds carrying capacities set environmental standards for the Lake Tahoe basin and indirectly defined the capacity of the Region to accommodate additional land development. In 2021, TRPA adopted an additional threshold category, Transportation and Sustainable Communities. Thresholds are long-term goals requiring contributions and actions from all Basin partners and should reflect the desired outcomes of the Basin. These thresholds need to be revisited and revised to establish priorities, leverage funding, and find solutions to Lake Tahoe's biggest environmental threats through the Environmental Improvement Program. Having outdated thresholds is like aiming at the past and doesn't help the Basin move forward and address the concerns and challenges of today.

Recommendations from the League:

- Approve the stream environment zone (SEZ) restoration, aquatic invasive species control, and Tahoe yellow cress conservation thresholds. These thresholds have been updated with significant stakeholder engagement and input from the Tahoe Science Advisory Council.
- Update the Forest Health threshold expeditiously as proposed in 2022: [TRPA Forest Health Threshold Staff Summary](#). Achieving and maintaining healthy forests by increasing the pace and scale of fuels reduction is essential to the protection of the Tahoe Basin.
- Create a timeline and scope of work for updating thresholds to solve Lake Tahoe's biggest environmental threats. Thresholds need to be updated as quickly as possible so we can ensure plans (RTP, RPU, etc) are helping achieve thresholds through interim targets or benchmarks year to year.

Thresholds are the TRPA and Tahoe's north star to guiding Basin-wide management. The League recognizes the complexity that the TRPA faces in updating thresholds and will continue to support these efforts and provide guidance through the interagency working groups, the Threshold Update Initiative Stakeholders Working Group (TUISWG) and through the Tahoe Science Advisory Council.

Sincerely,



Laura Patten
Natural Resource Director
League to Save Lake Tahoe



TAHOE

RESOURCE CONSERVATION DISTRICT

May 20, 2024

Tahoe Regional Planning Agency
128 Market Street
Stateline, NV

RE: TRPA Threshold Standards Update

Dear TRPA Governing Board,

The Tahoe Resource Conservation District is a Special District providing project and program implementation in the Tahoe Basin. Tahoe RCD was established in 1974 and we are celebrating our 50th anniversary of conservation in the Lake Tahoe Basin. Our programs include management of the Aquatic Invasive Species (AIS) Boat Inspection Program, AIS control work, leading the Tahoe Basin Network of Fire Adapted Communities program, leading the 2024 Community Wildfire Protection Plan Update (funded by CTC), we own and manage Johnson Meadow (a 206-acre parcel in the Upper Truckee), and provide stormwater monitoring services to the 4 Basin counties, City of SLT, Cal Trans, and NDOT. Tahoe RCD is also the co-lead for the AISCC EIP Working Group that developed the two new AIS Threshold standards and participated in the Watershed Restoration Group that developed the SEZ restoration goal.

We appreciate the effort to modernize the threshold categories by incorporating current science. The ongoing threshold update process is needed as many environmental thresholds are outdated (over 40 years old) and not easily understood. Applying current science provides better ways to protect the Tahoe environment while also offering more insight into the best ways to balance environmental concerns with people, recreation, and sustainable development. Tahoe RCD supports the current updates and encourages the TRPA Governing Board to adopt these updates.

We look forward to continuing work on updating additional threshold standards as the update process continues.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mike Vollmer", is written over a light blue horizontal line.

Mike Vollmer
Executive Director
775-901-0966

We Do Conservation

The mission of the Tahoe RCD is to promote the conservation, stewardship and knowledge of the Lake Tahoe region's natural resources by providing leadership and innovative environmental services to all stakeholders.