
MEMORANDUM

Date: April 18, 2018
To: Threshold Update Initiative Stakeholders Working Group
From: TRPA Staff
Subject: Threshold Update Initiative: Technical corrections of the threshold standards.

Requested Action: Recommendation to APC and GB on proposed technical corrections of the threshold standards (Resolution 82-11).

Background: At the March 28th meeting of the Threshold Update Initiative Stakeholders Working Group, TRPA and the Tahoe Science Advisory Council presented a framework for understanding overlap in the threshold standard system and the application of that framework to the standards adopted in Resolution 82-11. TRPA presented preliminary recommendations for a set of technical corrections to the threshold standards to partially address overlap in the system, clarify standard intent, while maintaining an equivalent level of protection. The recommended technical corrections are limited in scope to those types of overlap that can be resolved without either a policy decision or additional research. This limited scope ensures that the proposal maintains an equivalent level of protection, and neither increase nor decrease the protection of the threshold standard system.

At the March 28th, the working group directed staff to clarify the bridge between the current version of Resolution 82-11 and the proposed technical corrections so that the working group could more easily track where existing standards can be found in the proposal. Specifically, the workgroup requested:

1. Expand the numbering system to the entire threshold standard system
2. Provide a bridge in tabular format from existing standards in Resolution 82-11 to proposed modifications of Resolution 82-11
3. Provide an explanation of the type of overlap identified and the proposed solution

In response to the recommendations of the working group, TRPA initiated a full review of Resolution 82-11. There are currently 173 standards in Resolution 82-11. Existing standards, numbered in the order in which they appear in Resolution 82-11 are presented in Attachment B¹.

The proposed technical corrections to the threshold standards can be found in Attachment D and the bridge table to the existing standards can be found in Attachment E. The proposed technical corrections add numbers to each standard to more clearly identify standards within the text of Resolution 82-11. The proposed technical corrections include the proposed reorganization of the water quality category and the establishment of a subcategory for standards related to pollutant load. Loading standards are currently distributed between five subcategories within water quality and were identified as the primary cause of overlap in the water quality category. The proposed technical corrections consolidate all load reduction standards into the new subcategory to partially address the identified standards with multiple

¹ Renumbering based on the sequence in 82-11 results in a numbering that is different from that presented in attachments C and D of the March 28th 2018 meeting materials.

targets and indirect overlap identified in the review. The proposed corrections reduce the total number of water quality standards from 54 to 42.

The proposed reorganization of standards related to the non-degradation of stream environment zones consolidates nine standards in vegetation preservation and wildlife categories into a single standard in the vegetation preservation category. Standards consolidated as part of the proposal were each identified as being wholly encompassed by the proposed standard.

In aggregate, the proposed technical corrections consolidate the 173 currently adopted standards to 151 standards. The proposed technical corrections neither increase nor decrease the level of protection afforded by the system and will not impact project review or analysis.

The scope of proposed technical corrections to address the overlap identified in the review of the threshold standards is limited to only those changes that maintain equivalent level of protection and would reduce confusion or uncertainty around the intent of the standard or suite of standards related to specific focus area. Because of the limited scope for questions to be resolved in the technical corrections, the majority of the overlap identified as part of the review is not resolved. Resolution of the additional issues highlighted in the application of the Tahoe Science Advisory Council's framework requires either policy decisions or additional scientific research or both. As detailed in the initiative workplan, policy decisions and subject matter specific investigations (e.g. water quality, wildlife) will be prioritized and addressed iteratively to ensure all standards reflect the relevant values and are grounded in the best science.

At the April 18 meeting, the working group will be asked to discuss the proposed modifications to Resolution 82-11 and endorse moving forward with proposed changes to Resolution 82-11 presented in Attachment D.

Contact Information: If you have any questions regarding this agenda item please contact Dan Segan, Principal Natural Resource Analyst, at dsegan@trpa.org, (775) 589-5233.

Attachments:

- A. Threshold Update Initiative Stakeholders Working Group Meeting Agenda (4/18/18)
- B. Table of threshold standards adopted in Resolution 82-11 as amended December 12, 2012.
- C. Resolution 82-11 as amended December 12, 2012.
- D. Proposed technical corrections to Resolution 82-11.
- E. Bridge between Resolution 82-11 as amended December 12, 2012 and proposed technical corrections.
- F. Key for tables presented in attachments B, C, and E.