

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control, and Tahoe yellow cress conservation and to request that TRPA prioritize updating thresholds, which are mostly out of date and haven't been updated since 1982.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 Having outdated thresholds is like aiming at the past and doesn't help the Basin move forward and address the concerns and challenges of today.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