

Comment on Draft EIS/EIS/EIR for Meeks Bay Restoration Project League to Save Lake Tahoe August 9, 2022

The purpose of this letter is to express the League to Save Lake Tahoe's (League) support for the Meeks Bay Restoration Project Preferred Alternative advanced by the USDA Forest Service Lake Tahoe Basin Management Unit (LTBMU) as detailed in the Draft EIS/EIS/EIR.

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 restore meadows, marshes and the natural hydrologic function of Lake Tahoe's tributaries, which helps to prevent fine sediment, the leading cause of Lake Tahoe's dramatic clarity loss over the past half-century, from entering Lake Tahoe. The League also advocates for stormwater improvement projects, sustainable shoreline planning and control of aquatic invasive species (AIS) – all elements in the Preferred Alternative identified in the Meeks Bay Restoration Project.

The Preferred Alternative, when completed, would restore the only naturally functioning beach-barrier lagoon system in the Tahoe Basin; restore habitat for Threatened and Endangered species (such as Lahontan cutthroat trout and mountain yellow-legged frog); eradicate a significant infestation of the aquatic invasive plant Eurasian watermilfoil; reduce sediment input from erosion and scouring in Meeks Creek and stormwater runoff from the campground and day use areas on the project site; and restore aquatic organism passage upstream under the State Route 89 (SR 89) bridge. This is an unprecedented opportunity to restore sensitive habitat and natural hydrologic function to a beach-barrier lagoon system that has been altered and degraded for over a century.

The League hopes that the lead agencies will adopt the Preferred Alternative, as identified by LTBMU, the Tahoe Regional Planning Agency (TRPA) and Lahontan Regional Water Quality Control Board (Lahontan), as it is the only Alternative that fits the purpose and need for this project. The Meeks Bay Restoration Project offers the unique chance to remove a marina and restore the entire Meeks Creek and Meeks Lagoon system, following nearly a century of degradation. If properly implemented, the Project will significantly reduce both fine sediment and nutrient loading to Lake Tahoe. As stipulated in the Draft EIS/EIS/EIR during the scoping period, the LTBMU received over 100 comments on the project, the majority of which were supportive of restoration while being opposed to a new pier or boat ramp at Meeks Bay. The stakeholder meetings in which the League took part also echoed the same sentiment.

The League believes the project goals can be achieved with the Preferred Alternative. We still have concerns regarding the construction of any new pier included in the other Alternatives; reconstruction of trailer parking, new vehicle routes, and the campground and day use parking areas; and implementation of shoreline stabilization measures at the north end of Meeks Bay. To address these concerns, the League submitted a letter to the LTBMU on October 26, 2018, during the Project Scoping process, and provided verbal comments to the TRPA Regional Plan Implementation Committee on January 27, 2021. The League will continue to be involved in the stakeholder engagement process, advocating for full restoration at every opportunity.

The League supports analysis of emergency piers by TRPA in a separate analysis/document. The Meeks Bay Restoration Project should focus on restoration of the Meeks Creek and Lagoon system, as the stakeholders and public support full restoration and no pier as the preferred alternative, which was conveyed clearly during the Project Scoping process. During the TRPA Board meeting on June 22, 2022, staff stipulated that Meeks Bay had been ruled out as an appropriate location for a fire boat/emergency pier. A separate analysis regarding the most appropriate location for a fire boat/emergency pier for public safety on the West Shore should be conducted outside of the ongoing process for Meeks Bay.

In addition to our general comments, the League respectfully submits comments on the following elements:

Cabin Relocation: The League supports the removal and replacement of the gabion walls and concrete wall along the north end of Meeks Bay with natural retaining structures, such as boulders and willows. The League supports relocating the cabin, if feasible, to support full restoration of the shoreline to a natural beach-barrier lagoon system.

Day Use Areas: The League supports the installation of permanent Best Management Practices (BMP's) in the parking lots, restrooms and roadways to manage stormwater runoff and prevent sediment from reaching Meeks Creek and Lake Tahoe. Even if the day use parking areas are not constructed, BMP's should be an element of the restoration project to ensure that existing parking, restrooms and roadways meet the latest standards in stormwater management.

Piers: The League strongly recommends the no-pier alternative for this element, Alternative 4. Meeks Bay provides a unique opportunity for non-motorized access and recreation within Lake Tahoe, which should be the baseline condition, as the marina has been decommissioned. This no-pier alternative element also provides for the full and complete restoration of Meeks Creek and Meeks Bay. A pier would not only increase traffic and user conflict within Meeks Bay, it would have to be excessively long to accommodate boats, especially within the context of climate change, as Lake elevation continues to decline.

Campgrounds: With any reconstruction of the campground, the League encourages the use of BMP's to minimize stormwater runoff from the campground into Meeks Creek and Meeks Bay. The campground should also accommodate non-motorized users who travel to the campground via the new bike path or the Water Trail by providing secure bicycle and non-motorized watercraft storage. We also suggest providing environmental education and outreach messaging at the campground, including messaging to encourage campers to use Leave No Trace methods and practices, avoid sensitive areas around the Creek and Lagoon, and avoid Tahoe yellow cress habitat.

Bike/Pedestrian PathThe League strongly supports installing pedestrian routes, including a : pedestrian/bike bridge over Meeks Creek and beach access routes that are consistent with the SR 89 Corridor Plan. Such routes, especially the bridge, would partially alleviate the League's concerns with the campground by directing campers and day use visitors away from sensitive areas, including Tahoe yellow cress sites. Concentrating users on specific trails would also help avoid the creation of social trails and subsequent habitat damage and erosion. The League also supports pedestrian and bike trails as a way to reduce traffic around Tahoe and fine sediment loading in the Lake.

In conjunction with protecting onsite resources from human disturbance, the League supports the installation of interpretive signage along the Lagoon, Creek and pedestrian pathways. Specifically, we support signage with educational messaging and information on native and endemic species present at Meeks Bay, the restoration project itself, and the cultural importance of Meeks Bay for the Washoe tribe. The League would be available to help develop educational signage and other outdoor education efforts at the project site as opportunities arise. The League would like to see a "clean, drain and dry" station

included in the 2.5.4 description of upland storage facilities to mitigate potential impacts from non-motorized watercraft spreading AIS, in addition to educational components related to AIS prevention. The League also supports water bottle refill stations, as well as signed ADA paddle craft and beach access.

Conclusion

The League feels that the LTBMU shares our goals for this project – to see a fully restored and functioning Meeks Creek and Meeks Lagoon, to the benefit of Lake Tahoe – and looks forward to working with the LTBMU, TRPA, Lahontan and other agencies to see this project brought to fruition.

The League understands the detailed and comprehensive public outreach that went into the environmental analysis, and we ask that the agencies adopt the Preferred Alternative as the alternative that reflects agency, stakeholder and public feedback.