

January 26, 2026

Tahoe Regional Planning Agency Governing Board  
Environmental Improvement Program Committee  
128 Market Street  
Stateline, NV 89449

Re: Agenda Items IV and V. Updates to Environmental Threshold Carrying Capacities — Vegetation Preservation (Forest Health) and Water Quality

Dear Environmental Improvement Program Committee,

The League to Save Lake Tahoe (Keep Tahoe Blue) appreciates the opportunity to provide comments on the Water Quality Thresholds Update, and Vegetation Preservation (Forest Health) Thresholds Update. Keep Tahoe Blue 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 policies and projects that build resilience to climate change, reduce wildfire risk, and prevent fine sediment and nutrients from entering Lake Tahoe—outcomes that depend on strong, science-based, and actionable environmental thresholds.

Keep Tahoe Blue would like to acknowledge Tahoe Regional Planning Agency (TRPA) staff, the Tahoe Science Advisory Council, and partner agencies for the substantial work reflected in these threshold updates. Keep Tahoe Blue strongly supports the continued modernization of Tahoe’s environmental threshold standards and sees this effort as both necessary and long overdue to ensure that the Tahoe Regional Planning Compact (Compact) is implemented as intended and is consistent with the best available science, climate pressures, and cumulative impacts in the Tahoe Basin.

### **Environmental Thresholds and the Compact**

The Compact is explicit in its purpose and mandate. Article I of the Compact declares that the Region’s natural resources are being “threatened by increasing development” and that a coordinated regional approach is required to “maintain a balance between the region’s unique natural endowment and human use” (*Compact, Art. I(a)*). The Compact requires TRPA to establish, adopt, and maintain environmental threshold carrying capacities and to achieve and maintain those thresholds as the primary mechanism for preventing further environmental degradation and restoring the Basin’s natural resources (*Compact, Art. V(a)(1)–(2)*). These thresholds are not aspirational goals; they are the legal foundation of the Regional Plan, regulatory decision-making, and long-term environmental investment in the Basin.

For environmental thresholds to fulfill this mandate, they must reflect the best available science and current environmental conditions. Many of Tahoe’s thresholds were adopted decades ago, under baseline assumptions that no longer hold in a climate-altered system experiencing increased wildfire risk, prolonged drought, extreme precipitation, and new and emerging pollutants. Evaluating Basin conditions against outdated thresholds risks undermining the credibility of the threshold program and TRPA’s ability to meet its obligations under the Compact.

### **Agenda Item IV. Update to the Water Quality Environmental Threshold Carrying Capacities**

Keep Tahoe Blue supports the proposed restructuring of the water quality threshold standards to align with the adaptive management framework adopted by the Governing Board in 2019. Threshold standards should focus on specific, measurable, outcome-based environmental conditions, while management actions, discharge

requirements, and pollutant load tracking are more appropriately addressed through the Environmental Improvement Program (EIP) performance measures and the TRPA Code of Ordinances.

We support staff's recommendation to retain outcome-based water quality threshold standards while moving operational and regulatory standards. Importantly, this restructuring does not reduce regulatory protections, nor does it diminish the importance of managing stormwater, nutrient loading, or fine sediment. Rather, it clarifies the role of thresholds as environmental outcome indicators while maintaining enforceable protections through the TRPA Code of Ordinances and continued tracking through the Total Maximum Daily Load (TMDL) and Environmental Improvement Program (EIP) frameworks.

At the same time, we urge TRPA to ensure that retained water quality thresholds remain sufficiently protective of nearshore conditions and watershed-lake linkages, including impacts from wildfire, development, climate-driven hydrologic change, transportation, and emerging contaminants or concern, such as microplastics. Updated thresholds must meaningfully inform land-use, stormwater, and restoration decisions—not simply function as long-term reporting metrics.

### **Agenda item 5. Update to Vegetation Preservation (Forest Health) Thresholds**

Keep Tahoe Blue strongly supports the updated forest health threshold presented today and acknowledges the extensive scientific, technical, and interagency evaluation that has informed this update. The involvement of the Tahoe Science Advisory Council, the Threshold Update Initiative Stakeholders Working Group, and the Tahoe Fire and Fuels Team has resulted in a more defensible, modern, and actionable framework for assessing forest conditions in the Basin. We appreciate that TRPA is proposing five new forest health standards addressing stand density, seral stage and canopy cover, wildland-urban interface (WUI) defense zone fire behavior, and landscape fire dynamics. These indicators are grounded in the best available science and align with desired conditions identified by the Lake Tahoe West Partnership and the LTBMU Forest Plan.

We also support TRPA's formal recognition of fire as a central ecological process and the need to manage forests for resilience rather than static conditions. This update appropriately recognizes that Tahoe's forests are no longer operating within historical ranges of variability and that forest health must be evaluated in the context of climate-driven disturbance regimes, wildfire risk, drought stress, and the need for active, landscape-scale management. Keep Tahoe Blue sees the forest health threshold update as a strong example of how TRPA can responsibly modernize threshold standards while remaining grounded in best available science consistent with its Compact mandate.

### **Update All Thresholds Before the Next Evaluation**

While Keep Tahoe Blue appreciates the incremental updates presented today, we respectfully urge TRPA to commit to updating all environmental threshold standards prior to the next threshold evaluation cycle required under the Compact (*Art. V(a)*). Conducting a threshold evaluation using standards that are widely acknowledged to be outdated does not advance the Compact's mandate to achieve and maintain environmental thresholds.

Just as an Environmental Impact Report (EIR) or Environmental Impact Statement (EIS) based on 1982 baseline conditions would be legally and scientifically indefensible today, a threshold evaluation grounded in outdated standards likewise fails to reflect current climate and ecological realities. The forest health and vegetation threshold update demonstrates that comprehensive, science-based modernization is achievable. That same level of rigor and commitment should now be applied across the full suite of environmental thresholds to ensure that the next evaluation meaningfully reflects current environmental conditions and provides a defensible foundation for future regulatory, restoration, and investment decisions.

## Conclusion

We encourage the TRPA Governing Board to support moving these updated thresholds forward. Keep Tahoe Blue will continue to support this effort and to help communicate the importance of modern, science-based thresholds. Updating these standards is essential to bringing Tahoe's regulatory framework fully into alignment with the Compact and ensuring that environmental protection remains the Region's guiding principle.

Thank you for your leadership in protecting Lake Tahoe and for the opportunity to comment. Please feel free to reach out directly with further questions.

Sincerely,

A handwritten signature in cursive script that reads "Laura J. Patten".

Laura Patten  
Natural Resource Director