

June 23, 2026

Tahoe Regional Planning Agency  
Governing Board  
128 Market Street  
Stateline, NV 89449

Sent via email

Re: Agenda Item 9.B. Proposed Amendments to Chapter 36 Regarding Stealthing Requirements for Wireless Telecommunications Facilities

Dear Chair Williamson and Members of the Governing Board:

On behalf of the League to Save Lake Tahoe (Keep Tahoe Blue), thank you for the opportunity to provide comments on the proposed amendments to Chapter 36 regarding stealthing requirements for wireless telecommunications facilities. Keep Tahoe Blue generally supports the proposed amendments and appreciates the Tahoe Regional Planning Agency's (TRPA) efforts to address the environmental risks associated with plastic-based stealthing materials while balancing scenic protection and telecommunications infrastructure needs.

We appreciate that TRPA staff has developed a more consistent code framework to address concerns related to deterioration, fragmentation, shedding, and plastic debris associated with synthetic screening materials used in wireless telecommunications facilities. We also note the Advisory Planning Commission's recommendation for approval of these amendments and support TRPA's effort to establish clearer standards for future project review.

Keep Tahoe Blue has been actively engaged in efforts to better understand and prevent microplastic pollution in the Lake Tahoe Basin. We have supported and led research efforts related to microplastics, including studies examining stormwater pathways, tire wear compounds, textile fibers, litter, and emerging pollutant sources that may contribute plastic particles into Lake Tahoe and its tributaries. Through cleanup programs, citizen science, advocacy, and collaboration with research institutions and agencies, Keep Tahoe Blue has consistently emphasized that preventing plastics from entering the environment is significantly more effective than attempting to remove them once contamination occurs. These efforts reinforce the importance of taking a precautionary approach toward infrastructure materials that may degrade and contribute persistent plastic debris over time.

The proposed amendments recognize concerns regarding long-term durability, deterioration, and fragmentation of synthetic screening materials designed to imitate vegetation. In Tahoe's high-elevation environment, these plastic materials are exposed to intense ultraviolet radiation, snow loading, wind, freeze-thaw cycles, and wildfire-related stressors that can accelerate degradation. Keep Tahoe Blue volunteers have removed thousands of plastic pieces during cleanups over the past thirteen years, including plastic fragments associated with cell tower stealthing materials over the last five years. As these materials weather, fragment, and shed, they have the potential to contribute plastic debris and microplastics into the Basin environment. Prevention through amendments such as these remains the most effective strategy.

Because Lake Tahoe is designated as an Outstanding National Resource Water (ONRW), the Basin is subject to some of the highest water quality protections in the nation, including anti-degradation requirements intended to maintain and protect exceptional water quality. Tahoe's regulatory framework should therefore apply a higher bar when evaluating materials that may contribute to long-term environmental degradation or diffuse plastic pollution. While the impacts of any individual faux-tree installation may appear limited in isolation, the cumulative effect of aging synthetic materials distributed across the Basin warrants precautionary management.

We appreciate that TRPA's findings conclude the proposed amendment is environmentally neutral to beneficial and may improve environmental protection by establishing additional requirements where Plastic Screening Material is used. This is an important acknowledgment that stronger design standards, monitoring, and corrective action can help reduce long-term environmental risk while maintaining flexibility for project-specific review.

The proposed amendments also support Lahontan Regional Water Quality Control Board (Lahontan) policies and permit requirements for trash reduction and pollutant prevention. Lahontan and statewide stormwater programs increasingly recognize trash, plastic debris, and microplastics as water quality concerns requiring source control and prevention measures. In that context, synthetic screening materials that deteriorate or fragment over time should be evaluated not only for scenic compatibility, but also for their potential to contribute persistent debris and pollutant loading to the Basin environment.

Keep Tahoe Blue particularly supports the proposed provisions that: express a preference against Plastic Screening Material where practicable; encourage applicants to evaluate alternative stealthing approaches; require material durability documentation and performance information; establish post-installation baseline documentation; require biannual inspections and reporting; and authorize corrective action where deterioration or debris occurs.

Keep Tahoe Blue respectfully recommends several refinements to strengthen implementation of the ordinance:

**Require a stronger alternatives analysis:** Applicants proposing Plastic Screening Material should demonstrate why non-plastic or lower-impact alternatives are infeasible. In addition to comparison renderings, applicants should document why feasible alternatives were dismissed based on durability, scenic performance, and environmental impacts.

**Require a plastic-minimization design standard:** Add to Section 36.15.3.A:

"Where Plastic Screening Material is approved, facilities shall be designed to minimize the total amount of plastic material used, including minimizing surface area, component count, and exposed plastic elements, to the maximum extent feasible."

**Strengthen inspection standards:** In addition to biannual inspections, supplemental inspections should be required following major storm events, including severe wind, snow loading, or icing conditions that may increase the likelihood of degradation or shedding.

**Clarify corrective action requirements:** Where deterioration, fragmentation, or debris generation occurs, TRPA should require prompt cleanup, repair, replacement, or removal of the material, including consideration of replacement with non-plastic alternatives where feasible.

**Strengthen non-compliance consequences:** Add to Section 36.15.6 that if repeated corrective actions are required, TRPA may require replacement of Plastic Screening Material with non-plastic alternatives as a condition of continued operation.

**Maintain adaptive management tied to emerging science:** We support the ordinance's adaptive management framework and encourage TRPA to continue integrating evolving science regarding microplastics, material degradation, and pollutant pathways into future guidance and permit conditions. As the Tahoe Science Advisory Council's microplastics work continues to advance understanding of impacts in the Basin, TRPA should remain adaptive in managing emerging contaminants of concern.

Keep Tahoe Blue appreciates TRPA's leadership in addressing emerging environmental concerns while maintaining scenic standards in the Basin. With the refinements suggested above, the proposed amendments would better align with Lake Tahoe's ONRW protections, Lahontan's trash provisions, anti-degradation obligations, and long-term water quality goals.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Laura Patten". The signature is written in a cursive, flowing style.

Laura Patten

Natural Resource Director

League to Save Lake Tahoe (Keep Tahoe Blue)