Required Findings & Finding of No Significant Effect
for the Tahoe Keys Marina Redevelopment Project and Amendments to Chapters 37 and 90 of the TRPA Code of Ordinances

This document contains the required findings per Chapters 3, 4, 30, 33, 50, 80, 84 of the TRPA Code of Ordinances for the proposed Tahoe Keys Marina Redevelopment Project and amendments to Chapters 37 and 90 of the TRPA Code of Ordinances.

Chapter 3: Environmental Documentation

3.3.2 TRPA finds that the proposed project and code amendments will not have a significant effect on the environment.

Rationale: TRPA staff prepared an Initial Environmental Checklist (IEC) pursuant to Article VI of the TRPA Rules of Procedure and Chapter 3 (Environmental Documentation) of the TRPA Code of Ordinances to evaluate the potential environmental effects of the proposed Tahoe Keys Marina Redevelopment Project and proposed amendments to Chapters 37 and 90 of the TRPA Code of Ordinances.

The IEC evaluated the proposed Code amendments and determined that the amendments would not result in significant environmental impacts. The proposed Chapter 37 amendments would allow limited additional height for qualifying marina structures, subject to required findings, and would make a related adjustment to an existing additional-height provision for buildings that are not visible from Lake Tahoe or designated scenic highway corridors. The proposed Chapter 90 amendment would remove Venice Drive East from the definition of "Major Arterial" to reflect the roadway's existing configuration and function as a local access road. The Code amendments do not increase allowable density, land coverage, recreation capacity, or other development potential beyond that otherwise allowed under the TRPA Code, and they remain subject to applicable project-level review and findings. As evaluated in the IEC, the amendments would not adversely affect scenic resources or other environmental threshold categories.

The IEC also evaluated the proposed redevelopment project and determined that the project, as conditioned, would not result in significant environmental impacts. Potential effects related to water quality, scenic resources, biological resources, transportation, noise, and other resource areas were evaluated and addressed through the project design, technical analyses, and permit conditions. The project incorporates environmental and public access improvements, including permanent stormwater treatment facilities, aquatic invasive species management measures, construction-phase water quality controls, public restrooms, non-motorized watercraft access and storage, and a net reduction in land coverage.

Based on the IEC, supporting technical analyses, project plans, and draft permit conditions, TRPA staff recommends that the Governing Board make a Finding of No Significant Effect in accordance with Section 6.6 of the TRPA Rules of Procedure and Section 3.3.2 of the TRPA Code of Ordinances.

Chapter 4: Required Findings

4.4.1.A The project is consistent with and will not adversely affect implementation of the Regional Plan, including all applicable Goals and Policies, plan area statements and maps, the Code, and other TRPA plans and programs;

Rationale: The Tahoe Keys Marina Redevelopment Project is consistent with the Regional Plan because it would redevelop existing marina facilities within Plan Area Statement 102, where marina uses are allowed, and would replace aging and deteriorated facilities with modern marina infrastructure, water quality controls, public access improvements, and related site improvements. The project would maintain the existing marina use and existing operating slip count while modernizing marina facilities and providing improved boat launch, dock, fueling, storage, circulation, and public access amenities.

The project supports Regional Plan policies encouraging environmentally beneficial redevelopment by incorporating substantial environmental improvements into an already developed marina site. The redevelopment would reduce land coverage by 1,348 square feet, implement permanent stormwater Best Management Practices (BMPs), incorporate aquatic invasive species (AIS) management measures, replace aging bulkhead and dock infrastructure, improve pedestrian access through a waterfront promenade and public plaza, and provide dedicated facilities for non-motorized boating access and storage. The project also includes one-to-one replacement of existing multi-family residential units for workforce housing.

The project will not adversely affect implementation of the Regional Plan because it complies with applicable TRPA standards and required findings, as conditioned. Transportation impacts are limited, with a net VMT increase that remains below TRPA's low-VMT screening threshold. Scenic impacts have been evaluated through project-specific scenic analysis, and the project is not expected to reduce applicable scenic threshold ratings. The redevelopment also improves visual organization of the site by replacing outdoor boat storage and aging marina facilities with enclosed storage, coordinated architecture, earth-tone materials, landscaping, and a more cohesive site layout.

The proposed amendments to Chapters 37 and 90 of the TRPA Code of Ordinances are also consistent with the Regional Plan. The Chapter 37 amendments are narrowly tailored to allow limited additional height for qualifying marina buildings in specified circumstances, subject to required findings and project-level review, and do not authorize additional height for marinas generally. The amendments are designed to facilitate redevelopment while maintaining consistency with TRPA scenic policies and scenic threshold standards. The Chapter 90 amendment updates the definition of "Major Arterial" to better reflect the existing physical configuration and transportation function of Venice Drive East, which terminates in a cul-de-sac and does not function as a major through-route.

4.4.1.B. The project will not cause the environmental threshold carrying capacities to be exceeded; and

Rationale: The project will not cause environmental threshold carrying capacities to be exceeded. Potential effects on threshold categories, including water quality, scenic resources, biological resources, transportation, recreation, air quality, and noise, were evaluated

through the Initial Environmental Checklist (IEC) and supporting technical analyses and addressed through project design and permit conditions.

The project incorporates measures that support attainment and maintenance of environmental thresholds. Water quality protections include permanent stormwater treatment facilities, construction-phase BMPs, and implementation of an aquatic invasive species management plan. The redevelopment results in a net reduction of 1,348 square feet of land coverage.

Transportation impacts are limited. The transportation analysis determined that the project would result in a net increase of 218 average annual daily VMT within the Tahoe Basin, which is below TRPA's 715 daily VMT low-VMT screening threshold. Scenic impacts were evaluated through project-specific scenic analysis, including evaluation of applicable scenic threshold resources and nearby public viewpoints. The analysis concluded that the project would not reduce applicable scenic threshold ratings. Together with the project's design features and permit conditions, these facts support the finding that the project will not adversely affect the attainment or maintenance of any environmental threshold carrying capacity.

The proposed Code amendments will not cause any environmental threshold carrying capacity to be exceeded. The Chapter 37 amendments do not increase allowable density, land coverage, recreation capacity, or intensity of use, and any project seeking additional height under the amendments must satisfy applicable findings and project-level review requirements. The Chapter 90 amendment updates a roadway definition to reflect existing conditions and does not authorize development or increase transportation capacity. As evaluated in the IEC, the proposed code amendments would not adversely affect scenic resources, water quality, air quality, noise, transportation, biological resources, or any other threshold category.

4.4.1.C <u>Wherever federal, state, or local air and water quality standards apply for the region, the strictest standards shall be attained, maintained, or exceeded pursuant to Article V(d) of the Tahoe Regional Planning Compact.</u>

Rationale: The project will attain and maintain the strictest applicable federal, state, and local air and water quality standards pursuant to Article V(d) of the Tahoe Regional Planning Compact. Potential effects on air and water quality were evaluated through the Initial Environmental Checklist and are addressed through project design and permit conditions.

Water quality protections include implementation of permanent Best Management Practices (BMPs) designed to capture, treat, and infiltrate stormwater runoff from the 20-year, 1-hour storm event, installation of a subsurface infiltration system, reduction in land coverage, replacement of aging marina infrastructure, and implementation of an approved aquatic invasive species management plan. These measures are designed to reduce pollutants and protect water quality in Lake Tahoe and the Tahoe Keys lagoon system.

Air quality impacts associated with construction and operation of the project are limited and will be addressed through permit conditions and compliance with applicable federal, state, and local requirements related to emissions, dust control, and equipment operation and maintenance. Operational transportation impacts are also limited, with a

net VMT increase below TRPA's low-VMT screening threshold. As conditioned, the project will attain, maintain, or exceed the strictest applicable air and water quality standards.

4.6 The Regional Plan and all of its elements, as implemented through the Code, Rules, and other TRPA plans and programs, as amended, achieves and maintains thresholds.

Rationale: The proposed Code amendments are consistent with the Regional Plan and will not adversely affect the attainment or maintenance of environmental threshold carrying capacities. The amendments limit additional building height to areas with minimal or no visibility from Lake Tahoe and designated scenic corridors and do not increase development potential or intensity of use. Accordingly, the Regional Plan, as implemented through the Code and as amended, will continue to achieve and maintain environmental thresholds.

Chapter 30: Land Coverage

30.4.4.A TRPA-verified existing land coverage may be relocated on the same parcel or project area if TRPA finds that:

The relocation is to an equal or superior portion of the parcel or project area, as determined by reference to the following factors:

1. Whether the area of relocation already has been disturbed;
2. The slope of and natural vegetation on the area of relocation;
3. The fragility of the soil on the area of relocation;
4. Whether the area of relocation appropriately fits the scheme of use of the property;
5. The relocation does not further encroach into a stream environment zone, backshore, or the setbacks established in the Code for the protection of stream environment zones or backshore;
6. The project otherwise complies with the land coverage mitigation program set forth in Section 30.6.

Rationale: The project includes relocation of TRPA-verified existing land coverage within the existing developed project area to facilitate redevelopment of the existing marina and improve the site layout. The coverage relocation will occur within an already developed marina site containing existing buildings, parking areas, driveways, boat storage areas, and related marina facilities. The relocation areas are generally flat (generally less than five percent slope), contain limited native vegetation, and are located within land capability Class 6 areas, indicating low soil fragility and suitability for development.

The relocation is to an equal or superior portion of the project area because the existing and relocated coverage areas are located on previously disturbed Class 6 land within the existing marina development footprint. The relocated coverage appropriately fits the scheme of use of the property by consolidating redevelopment within the existing marina site, improving circulation, and separating operational areas, including the boat launch, fueling facilities, vessel staging, and boat storage, from pedestrian-oriented public spaces such as the waterfront promenade and plaza. This site design supports a more functional and organized marina layout while reducing overall land coverage.

The relocation does not further encroach into a stream environment zone, backshore area, or associated setback. The redevelopment is concentrated within previously disturbed, man-modified portions of the project area and avoids relocation of coverage into sensitive environmental areas.

The project also complies with TRPA's land coverage mitigation requirements in Section 30.6, including payment of the applicable excess coverage mitigation fee, and results in a net reduction of 1,348 square feet of land coverage.

30.4.4.B The area from which the land coverage was removed for relocation is restored in accordance with subsection 30.5.3.

Rationale: Areas from which land coverage is removed and not otherwise redeveloped with approved project improvements will be restored in accordance with TRPA Code Subsection 30.5.3. The project includes a landscape and restoration plan providing for stabilization, revegetation, and treatment of disturbed areas with appropriate plant materials and erosion control measures. Compliance with restoration requirements will be ensured through permit conditions and site inspections.

30.4.4.C The relocation shall not be to Land Capability Districts 1a, 1b, 1c, 2, or 3, from any higher numbered land capability district.

Rationale: The project complies with this requirement because relocated land coverage will remain within Land Capability Class 6 areas of the project site. No land coverage will be relocated from a higher-numbered land capability district to Land Capability Districts 1a, 1b, 1c, 2, or 3.

30.4.4.D: If the relocation is from one portion of a stream environment zone to another portion, there is a net environmental benefit to the stream environment zone. "Net environmental benefit to a stream environment zone" is defined as an improvement in the functioning of the stream environment zone and includes, but is not limited to:

1. Relocation of coverage from a less disturbed area to a more disturbed area or to an area further away from the stream channel or water body, as applicable;
2. Retirement of land coverage in the affected stream environment zone in the amount of 1.5:1 of the amount of land coverage being relocated within a stream environment zone; or
3. For projects involving the relocation of more than 1,000 square feet of land coverage within a stream environment zone, a finding, based on a report prepared by a qualified professional, that the relocation will improve the functioning of the stream environment zone and will not negatively affect the quality of existing habitats, considering factors such as, but not limited to, soil function, hydrologic function, vegetation, and wildlife habitat

Rationale: This requirement does not apply because the project does not involve relocation of land coverage from one portion of a stream environment zone to another. No land coverage will be relocated into a stream environment zone.

Chapter 33: Grading

33.3.6.A.2.a TRPA may approve exceptions to the prohibition of groundwater interception or interference if TRPA finds that excavation is required by the International Building Code

(IBC) or local building code for minimum depth below natural ground for above ground structures;

Rationale: In accordance with the International Building Code (IBC) and California Building Code, foundation systems must be designed based on site-specific geotechnical conditions and be capable of providing structural support, resistance to settlement, and protection from seismic hazards. The structural/foundation prepared by Schaefer Engineering (February 28, 2026), relying on site-specific geotechnical information, concluded that all feasible foundation systems capable of supporting the proposed structures and addressing site-specific loading, settlement, and seismic considerations would require excavation below the groundwater table to reach competent bearing soils.

Schaefer Engineering determined that the proposed buildings are most appropriately supported by deep pile foundations. The project site contains approximately 10 feet of fill over native soil and has a shallow groundwater table. The piles are designed to extend approximately 20 feet below grade to reach competent native soils capable of supporting the proposed structures. As a result, a code-compliant foundation necessarily extends below the groundwater table at this site, making some groundwater interception unavoidable.

The proposed pile foundation system is specifically designed to minimize groundwater interception and interference. The project site's proximity to Lake Tahoe and the Upper Truckee Marsh means that groundwater levels and movement are directly influenced by lake levels and nearby wetland conditions. Unlike conventional slab, mat, or spread footing foundations, pile foundations do not create a continuous underground barrier. Engineering analysis indicates that groundwater can continue to flow around the individual piles and that the proposed foundation system has a lower potential to impede groundwater movement or alter existing groundwater flow patterns.

In addition, pile installation methods are designed to prevent discharges to groundwater and minimize disturbance to surrounding soils during construction. Although groundwater interaction is unavoidable when constructing code-compliant foundations, it has been minimized to the maximum extent practicable through foundation design and construction methods.

33.3.6.A.2.g TRPA may approve exceptions to the prohibition of groundwater interception or interference if TRPA finds that there are no feasible alternatives for locating mechanical equipment, and measures are included in the project to prevent groundwater from leaving the project area as surface flow, and any groundwater that is interfered with is rerouted in the groundwater flow to avoid adverse impacts to riparian vegetation.

Rationale: The project includes elevator shafts within the proposed commercial buildings that require below-grade elevator pits to satisfy applicable building and accessibility requirements. Due to the shallow groundwater table present throughout the project site, construction of the elevator pits will result in localized groundwater interception. There are no feasible alternative locations for the elevator equipment that would avoid groundwater interaction because groundwater is encountered at shallow depths across the site. Due to TRPA's height limitations, the buildings cannot be raised to avoid groundwater interception by the elevator pits, and the Americans with Disabilities Act mandates elevators in buildings with two or more stories.

The elevator pits are limited in size (approximately six feet by six feet) and will affect only a small volume of groundwater. The project includes design measures to prevent groundwater from leaving the project area as surface flow, and any groundwater encountered will be managed within the subsurface so that groundwater movement can continue around the structures. Given the limited footprint of the elevator pits and the site's connection to Lake Tahoe and nearby wetlands, groundwater interference is not expected to adversely affect groundwater flow patterns, hydrologic conditions, or riparian vegetation. Accordingly, TRPA finds that there are no feasible alternatives for locating the elevator equipment that would avoid groundwater interaction and that the project includes measures to prevent adverse groundwater-related impacts.

33.3.6.A.2.j TRPA may approve exceptions to the prohibition of groundwater interception or interference if TRPA finds that it is necessary for a marina expansion approved pursuant to Chapter 14: *Specific and Master Plans*, and the environmental documentation demonstrates that there will be no adverse effect on groundwater.

Rationale: exception facility in a TRPA includes this finding as supplemental support for the groundwater because the proposed project involves redevelopment of an existing marina shallow-groundwater setting.

The Code recognizes that groundwater interception or interference may be necessary for marina construction because marinas are commonly located in areas with shallow groundwater. The Tahoe Keys Marina Redevelopment Project includes redevelopment of an existing marina facility located on fill material within a man-made lagoon, where groundwater is naturally shallow and influenced by Lake Tahoe and surrounding wetland conditions.

Although the Code was amended in 2018 to eliminate the requirement for marina master plans, the proposed project is being reviewed under the current Code provisions governing modifications and expansions of existing marinas, including Chapter 84. The purpose of Section 33.3.6.A.2.j applies to the proposed marina redevelopment because the project involves marina improvements in the same shallow-groundwater setting contemplated by the exception, and the environmental documentation evaluates the potential groundwater effects of the proposed construction.

The environmental documentation, engineering analysis, and permit conditions demonstrate that the project will not adversely affect groundwater. The proposed pile foundation system minimizes groundwater interception by avoiding a continuous below-grade barrier and allowing groundwater to move around individual piles. Construction activities involving groundwater will be subject to applicable geotechnical recommendations, dewatering and discharge requirements, stormwater controls, and permit conditions intended to prevent erosion, sediment transport, turbidity, or discharge of untreated water. Accordingly, TRPA finds that the limited groundwater interception or interference associated with the proposed marina redevelopment is necessary for the project and will not result in adverse effects on groundwater.

Chapter 37: Height

37.7.1 When viewed from major arterials, scenic turnouts, public recreation areas, or the waters of Lake Tahoe, from a distance of 300 feet, the additional height will not cause a building to extend above the forest canopy, when present, or a ridgeline. For height greater than that set forth in Table 37.4.1-1 for a 5:12 roof pitch, the additional height shall not increase the visual magnitude beyond that permitted for structures in the shoreland as set forth in subsection 66.3.7, Additional Visual Magnitude, or Appendix H, Visual Assessment Tool, of the Design Review Guidelines.

Rationale: Buildings A, B, C, and D, proposed at a maximum height of 34 feet 5 inches, will not be visible from major arterials, scenic turnouts, designated public recreation areas, or designated scenic bicycle paths. While portions of the buildings may be visible from nearby public viewpoints, including the Cove East Trail, those views are localized and were evaluated through the project's scenic analysis. The project will not result in a reduction in scenic threshold ratings. Limited portions of the buildings may be visible from certain shoreline viewpoints, including portions of Shoreline Unit 33, but those views are physically and visually distant, screened by intervening vegetation and existing development, and will not result in a reduction in threshold ratings.

The proposed boat storage building, with a maximum height of 42 feet, and the dockmaster building, proposed at 36.5 feet, are located much farther inland than the other proposed structures. Scenic analysis demonstrates that the buildings will not be visible from major arterials, scenic turnouts, designated public recreation areas, designated scenic bicycle paths, or the waters of Lake Tahoe.

A forest canopy is not present within or immediately adjacent to the project site because the site is located within the developed Tahoe Keys subdivision and adjacent to the Upper Truckee Marsh, so the proposed buildings will not extend above a forest canopy. Mountain ridgelines are visible in the background from portions of Lake Tahoe and nearby public viewpoints, but the proposed buildings will not extend above, interrupt, or dominate those ridgeline features. Any modifications to ridgeline views are limited to localized viewpoints near the project site and do not affect the majority of available views along nearby travel routes.

Potential visual impacts were evaluated through scenic renderings and field verification using balloon tests to simulate proposed building heights. These analyses demonstrate that the additional height will not result in a reduction in applicable scenic threshold ratings and will not create visual magnitude impacts inconsistent with TRPA Code Section 66.3.7 or the Design Review Guidelines.

37.7.2 When outside a community plan, the additional height is consistent with the surrounding uses.

Rationale: The project area is located outside a community plan within the developed Tahoe Keys subdivision, which contains a mix of residential, commercial, recreational, and marina-related uses. The Tahoe Keys Marina has operated as a higher-intensity recreational and commercial use for more than 50 years and is distinct in character and function from the surrounding residential development.

Although some of the proposed buildings are taller than nearby residential structures, the buildings serve specialized marina functions that are not comparable to residential uses, including indoor boat storage, marina operations, water storage infrastructure, and accessory commercial services. The additional height is limited to that necessary to accommodate these functions, including three to four levels of boat storage, water tanks, two-story marina facilities, and compliance with applicable design standards.

The proposed redevelopment maintains the historic marina use of the property while modernizing aging facilities and improving site layout. In addition, scenic analysis demonstrates that the additional height will not result in significant visual impacts or a reduction in scenic threshold ratings. With these considerations, the proposed building heights are consistent with the scale, intensity, and function of surrounding uses.

37.7.3. With respect to that portion of the building that is permitted the additional height, the building has been designed to minimize interference with existing views within the area to the extent practicable.

Rationale: The project has been designed to minimize interference with existing views to the extent practicable while accommodating the operational needs of a modern marina. Although portions of the project will be visible from certain nearby viewpoints, including the Cove East Trail and surrounding residential areas, scenic analysis determined that view impacts are localized and do not affect the majority of available views along nearby travel routes. Although the Cove East Trail is not a designated scenic threshold resource for purposes of TRPA scenic threshold ratings, the project's scenic analysis evaluated views from that area to assess whether the additional height would block or modify existing views of Lake Tahoe or other scenic vistas.

The tallest structure, the proposed boat storage building, is located approximately 3,000 feet from the open waters of Lake Tahoe and farther inland than the other proposed buildings. As demonstrated through scenic analysis, the building will not be visible from Lake Tahoe or other designated scenic resource areas. Buildings A, B, C, and D, which may be visible from limited viewpoints, are proposed at a maximum height of 34 feet 5 inches, below the 38-foot height that would be permitted under the proposed amendments to Chapter 37 of the Code of Ordinances.

The project also incorporates contemporary mountain architecture, compliant earth-tone colors, natural materials, and landscaping designed to blend with the surrounding environment. In addition, taller tree species are avoided in locations where they would unnecessarily obstruct existing ridgeline views. Scenic analysis concluded that the project would not result in a reduction in scenic threshold ratings.

37.7.4. The function of the structure requires a greater maximum height than otherwise provided for in this chapter.

Rationale: The function of the proposed structures requires greater height than otherwise permitted by the Code of Ordinances. The indoor boat storage facility is designed to accommodate up to three to four levels of boat storage, water storage tanks, and

associated structural systems necessary to support marina operations. The additional height allows the marina to maintain the storage capacity currently provided by outdoor storage areas while consolidating those functions within an enclosed building. This approach improves the visual character of the site, creates additional space for stormwater treatment and infiltration facilities, and results in a net reduction in land coverage. By allowing boats to be stored vertically on site, the building reduces reliance on dispersed outdoor storage and off-site storage trips while preserving space on the site for circulation, public access, and stormwater treatment.

The proposed two-story commercial buildings are designed to accommodate marina-related services and operations in a compact footprint. Site constraints, including the need to preserve space for circulation, parking, public access, stormwater treatment facilities, and other marina functions, limit the ability to expand these uses horizontally. The requested height is therefore the minimum necessary to accommodate the operational and functional requirements of the proposed redevelopment.

37.7.7 The additional building height is the minimum necessary to feasibly implement the project and there are no feasible alternatives requiring less additional height.

Rationale: The additional building height is the minimum necessary to feasibly implement the project. The proposed height accommodates two-story commercial buildings and an indoor boat storage facility designed to vertically stack boats up to three to four levels, including required structural depth. These features support the functional needs of a full-service marina by consolidating uses on-site, improving operational efficiency, and reducing sprawling outdoor storage areas.

The project has been designed as a comprehensive marina redevelopment that includes public access improvements, workforce housing, water quality improvements, enclosed boat storage, marina services, restaurants, and commercial amenities. Within that project design, the requested height is the minimum necessary to accommodate the proposed uses while preserving space for circulation, public access, stormwater treatment facilities, and other site functions.

There are no feasible alternatives that would require less additional height while achieving the objectives of the proposed environmentally beneficial redevelopment. Reducing the height of the boat storage building would reduce or eliminate the ability to vertically stack boats within an enclosed structure, which would either reduce on-site storage capacity, require additional horizontal development area, or continue reliance on outdoor storage. Reducing the height of the two-story marina buildings would similarly require expanded building footprints or reduced marina-support uses, which would conflict with the project's objectives of preserving space for circulation, public access, stormwater treatment facilities, and other site functions.

37.7.8 The maximum building height at any corner of two exterior walls of the building is not greater than 90 percent of the maximum building height. The maximum height at the corner of two exterior walls is the difference between the point of lowest natural ground elevation along an exterior wall of the building, and point at which the corner of the same exterior wall meets the roof. This standard shall not apply to an architectural feature described as a prow.

Rationale: The proposed buildings comply with this requirement. For each building receiving additional height, the maximum building height at any corner of two exterior walls does not exceed 90 percent of the maximum building height, consistent with the measurement methodology established in Section 37.7.8. Compliance is demonstrated on the submitted building elevations and grading plans.

Chapter 50: Allocation of Development

50.9.1 Approval of additional recreation facilities shall only be permitted for projects for which the sponsoring entity demonstrates and TRPA finds that:

50.9.1.A There is a need for the project;

Rationale: Pursuant to TRPA Code Section 50.9.1, projects that increase People At One Time (PAOT) capacity must demonstrate a need for the additional allocation. The proposed project requests 166 summer day-use PAOTs, consisting of 66 PAOTs associated with existing operating boat slips proposed for formal recognition through this project approval and 100 PAOTs associated with new summer-use dry boat storage facilities.

The requested allocation is needed to support the continued operation and modernization of the Tahoe Keys Marina, an existing recreational facility that has provided boating access to Lake Tahoe for more than 50 years. The 66 slip-related PAOTs correspond to slips that are currently operating at the marina but have not previously been formally recognized through TRPA permitting. The additional 100 PAOTs are needed to accommodate new summer-use dry boat storage facilities that expand the marina's recreational capacity while allowing boat storage to be consolidated within enclosed buildings. The dry boat storage also provides on-site boat storage opportunities, reducing the need for boat owners to transport boats to and from off-site storage locations and supporting efforts to minimize the spread of aquatic invasive species.

The requested PAOT allocation supports implementation of environmental improvements, public access amenities, and updated marina infrastructure while maintaining and enhancing recreational access opportunities consistent with Regional Plan policies supporting environmentally beneficial redevelopment.

50.9.1.B The project complies with the Goals and Policies, the applicable plan area statements, and Code;

Rationale: The project complies with the Regional Plan Goals and Policies, applicable plan area statements, and the TRPA Code of Ordinances. The requested PAOT allocation supports the redevelopment and modernization of an existing marina within Plan Area Statement 102 and is associated with existing operating boat slips proposed for formal recognition and a new dry boat storage facility. The allocation supports recreational access while facilitating water quality improvements, aquatic invasive species management, public access enhancements, and other environmental benefits consistent with Regional Plan policies supporting environmentally beneficial redevelopment.

50.9.1.C The project is consistent with the following TRPA maximum allowances for outdoor recreation:

1. 6,114 people at one time ("PAOT") in overnight facilities;

2. 6,761 PAOT in summer day-use facilities;
3. 12,400 PAOT in winter day-use facilities; and
4. Plus the allocations set forth in the plan area statements, or the pools of reserved PAOT capacity;

Rationale: Plan Area Statement 102 (Tahoe Keys) does not include allocations for additional developed outdoor recreation. However, TRPA Code Section 11.6.11.B allows additional recreational capacity to be allocated from regional pools of reserved capacity. The project requests 166 summer day-use PAOTs, which will be drawn from the regional pool reserved for marina and boat launching facility expansion. The reserved pool currently contains 1,771 available summer day-use PAOTs, which is sufficient to accommodate the requested allocation.

50.9.1.D The project meets the findings adopted pursuant to Article V(g) of the Compact as set forth in Chapter 4: Required Findings, as they are applicable to the project's recreational service capacity; and

Rationale: The project meets all applicable findings required by Chapter 4 of the TRPA Code of Ordinances. The requested PAOT allocation is associated with a redevelopment project that has been found consistent with the Regional Plan, applicable plan area statements, environmental threshold carrying capacities, and all other applicable findings set forth in Chapter 4. The additional PAOT allocation will not cause environmental threshold carrying capacities to be exceeded because transportation, water quality, recreation, scenic, and biological effects associated with the allocation were evaluated in the IEC and addressed through project design and permit conditions.

50.9.1.E If the project requires PAOT allocations, it is consistent with the TRPA Environmental Improvement Program.

Rationale: The Tahoe Keys Marina Redevelopment Project is consistent with the Environmental Improvement Program (EIP) because it replaces aging marina infrastructure with modern facilities that support environmental threshold attainment and implement improvements consistent with EIP priorities. The project includes a net reduction of 1,348 square feet of land coverage, installation of permanent water quality Best Management Practices (BMPs), and implementation of an approved Aquatic Invasive Species (AIS) Management Plan. Additional improvements include green infrastructure features, such as permeable paving, stormwater treatment and infiltration facilities, and replacement of outdoor boat storage with enclosed facilities.

The project also provides public benefits through improved recreational access, a waterfront promenade, enhanced AIS inspection and management facilities, and water storage tanks that improve fire protection and emergency response capabilities. Collectively, these improvements further EIP objectives related to water quality, recreation, ecosystem protection, and community resilience.

Chapter 80: Review of projects in the Shorezone and Lakezone

80.3.2.A General Environmental Findings. TRPA must analyze and make the required environmental findings pursuant to Chapter 3, Environmental Documentation. In

addition, such environmental findings must demonstrate that the project will not adversely impact:

1. Littoral processes;

2. Fish spawning;

3. Backshore stability; or

4. On-shore wildlife habitat, including wildfowl nesting areas.

Rationale: The project will not adversely affect littoral processes, fish spawning habitat, backshore stability, or on-shore wildlife habitat. The proposed improvements are located within the Tahoe Keys Marina, an existing developed marina facility situated within a man-made lagoon landward of the open shoreline of Lake Tahoe and outside the active littoral zone. As a result, the project will not alter littoral processes along the open shoreline of Lake Tahoe or affect backshore stability.

The project area consists primarily of existing marina facilities, paved parking areas, developed boat storage areas, and previously disturbed upland areas. Although the site is adjacent to the Upper Truckee Marsh, redevelopment activities are concentrated within the existing developed marina footprint and avoid sensitive marsh habitats. The project includes environmental protection measures and best management practices to minimize temporary construction-related effects on adjacent natural resources.

The project does not occur within designated fish spawning habitat and will not result in the loss or degradation of spawning areas. In-water and shoreline construction activities will be conducted in accordance with permit conditions and applicable agency approvals. Protective measures will include temporary isolation of in-water work areas, turbidity curtains, turbidity monitoring, erosion and sediment controls, spill prevention measures, and construction-related aquatic invasive species controls.

The upland project area consists primarily of existing marina facilities, paved parking areas, developed boat storage areas, and previously disturbed lands. Biological surveys conducted for the project did not identify any special-status wildlife species or other sensitive biological resources that would be adversely affected by the project. In addition, pre-construction surveys will be conducted prior to activities that could disturb wildlife, and appropriate avoidance measures will be implemented if sensitive species or active nests are identified.

80.3.2.B Accessory Facilities. TRPA must find that there are sufficient accessory facilities to accommodate the project.

Rationale: The project includes sufficient accessory facilities to accommodate the proposed marina uses. The redevelopment provides supporting facilities, including marina administration, public restrooms, boat storage, fuel facilities, utilities, waste management facilities, and workforce housing for marina employees. These facilities are designed to support the day-to-day operation of the marina.

The project also includes parking, pedestrian circulation improvements, and public access amenities. Although the total number of parking spaces is reduced from existing conditions, parking demand was evaluated for the proposed mix of marina, restaurant,

office, charter, storage, and public access uses. With implementation of the employee parking management program and other operational measures, the parking supply has been determined to be adequate to accommodate anticipated demand while complying with applicable TRPA Code requirements.

80.3.2.C Compatibility. TRPA must find that the project is compatible with existing shorezone and lakezone uses or structures on, or in the immediate vicinity of, the littoral parcel; or that modifications of such existing uses or structures will be undertaken to assure compatibility.

Rationale: The project is compatible with existing shorezone and lakezone uses and structures in the immediate vicinity of the project area. The Tahoe Keys Marina has operated as a major marina facility for more than 50 years and is located within the Tahoe Keys lagoon system, an area developed for boating access and water-dependent recreation. The proposed redevelopment maintains this established use while replacing aging infrastructure with modern marina facilities.

Shorezone improvements, including replacement of the boat launch, bulkhead, docks, and related marina infrastructure, are consistent with existing marina operations and surrounding boating uses. The project does not introduce new or incompatible shorezone uses and remains compatible with nearby residential boating facilities, navigational channels, and marina-related structures.

80.3.2.D Water Dependent Use. TRPA must find that the proposed use in the lakezone, nearshore, foreshore, or lagoon is water-dependent.

Rationale: The proposed marina use is water-dependent because it includes boat launching, docking, fueling, boat storage, and other marina operations that require direct access to navigable water. These uses depend on a location within the lagoon system and cannot be feasibly located away from the water. The project's shorezone and lagoon improvements, including replacement of the boat launch, docks, bulkhead, and related marina infrastructure, directly support recreational boating activities and require access to the water.

80.3.2.E Hazardous Materials. TRPA must find that measures will be taken to prevent spills or discharges of hazardous materials.

Rationale: Measures will be implemented to prevent spills or discharges of hazardous materials during both construction and long-term marina operations. During construction, contractors will implement a Spill Prevention and Response Plan, store hazardous materials in designated staging areas with appropriate containment measures, and conduct fueling and equipment maintenance in controlled areas designed to prevent accidental releases.

Following redevelopment, the marina will incorporate several improvements that reduce the potential for hazardous material releases. These include replacement of the aging bulkhead with a modern steel sheet pile system, upgrades to fueling facilities to meet current environmental standards, replacement of existing docks to prevent the discharge of plastic foam into the lagoon, and construction of an enclosed trash facility with a compactor to reduce the potential for spills and exposure to precipitation and runoff.

Long-term marina operations will be further supported through Clean Marina Certification, which requires implementation of best management practices for fuel handling, waste management, and pollution prevention. The marina will maintain pump-out facilities, provide oil-absorbent materials for bilge management, and implement an approved Aquatic Invasive Species (AIS) Management Plan. Together, these measures are designed to prevent spills and discharges of hazardous materials and protect water quality.

80.3.2.F Construction. Construction and access techniques will be used to minimize disturbance to the ground and vegetation.

Rationale: The project has been designed to minimize disturbance to the ground and vegetation during construction. Redevelopment activities will occur primarily within the existing developed marina footprint, including previously disturbed areas occupied by buildings, parking areas, boat storage yards, and other marina facilities. Best Management Practices (BMPs) will be used during construction to control erosion, stabilize disturbed soils, and protect vegetation. Temporary construction and staging areas not otherwise developed with approved project improvements will be stabilized, restored, or revegetated following project completion.

80.3.2.G Navigation and Safety. TRPA must find that the project will not adversely impact navigation or create a threat to public safety pursuant to the determination of agencies with jurisdiction over the navigable waters in the Basin.

Rationale: The project will not adversely impact navigation or create a threat to public safety. Navigation within the Tahoe Keys Marina lagoon will be maintained during construction, with only temporary restrictions as necessary to accommodate in-water work. Appropriate safety measures, temporary navigation controls, and coordination with agencies having jurisdiction over navigable waters will ensure safe vessel movement during construction.

Upon completion, the redevelopment is expected to improve navigation and public safety within the marina. Relocation of the boat launch and gantry crane to the southern end of the lagoon channel will improve circulation and reduce conflicts between motorized and non-motorized watercraft. The southern location also provides more favorable depth conditions, reducing congestion and improving boat access during periods of lower lake levels. The project modernizes existing marina infrastructure without creating new navigational hazards and is expected to enhance overall navigation efficiency and safety within the lagoon.

80.3.2.H Other Agency Comments. TRPA must find that it has solicited comments from those public agencies having applicable jurisdiction over the lakezone, shorezone, and lagoon, and that all comments received from such agencies were considered prior to taking action on the project.

Rationale: TRPA facilitates monthly Shoreline Review Committee (“SRC”) meetings for agencies with permitting jurisdiction along the shoreline and within Lake Tahoe to coordinate project permitting and review. The project was reviewed and discussed at the SRC meeting on May 21, 2026, and comments were solicited from agencies with applicable jurisdiction over the lakezone, shorezone, and lagoon. Comments received from those

agencies have been considered during environmental review and project design and will be incorporated into project permitting, as applicable.

The project is currently under review by the U.S. Army Corps of Engineers and the Lahontan Regional Water Quality Control Board. The California State Lands Commission determined that it does not have jurisdiction over the proposed project area and therefore did not provide comments.

Chapter 84: Development Standards Lakeward of High Water In the Shorezone and Lakezone

84.6.2.B.1 All marinas shall prepare and implement an Aquatic Invasive Species Management Plan within three years of December 24, 2018. The Management Plan shall, at a minimum:

a. Identify strategies to prevent the establishment of invasive macrophytes and Asian clams within the marina or where aquatic invasive species are already present, identify measures to control or eradicate the species, or reduce the potential for their spread;

Rationale: TRPA approved an Aquatic Invasive Species (AIS) Management Plan for the Tahoe Keys Marina in November 2024 (MAIS2024-0003) and an updated plan in November 2025 (MAIS2025-0007). The AIS Management Plan includes staff training, public education, vessel inspection procedures, and operational protocols designed to prevent the introduction and establishment of aquatic invasive species within the marina and reduce the potential for their spread to other areas of Lake Tahoe.

The plan also includes measures to control and remove existing aquatic invasive species within the lagoon system. AIS control strategies include the use of a PixieDrone to remove floating debris and vegetation from the water surface, a CollecThor system to remove invasive aquatic plant material from below the water surface, and a bubble curtain in the East Channel to help limit the movement of aquatic invasive species between the Tahoe Keys lagoons and Lake Tahoe.

In addition, the marina implements vessel decontamination and inspection procedures consistent with California Department of Fish and Wildlife standards to reduce the risk of transporting aquatic invasive species, including New Zealand mudsnails, between water bodies.

b. Include an aquatic invasive species monitoring and early detection program within the marina and, where feasible, partner with appropriate resource management agencies or organizations; and

Rationale: The marina's approved Aquatic Invasive Species (AIS) Management Plan includes monitoring and early detection measures designed to identify new infestations of aquatic invasive species within the marina and lagoon system. The plan includes routine visual inspections, staff training, monitoring protocols, and reporting procedures that support early detection and rapid response to aquatic weeds, invasive invertebrates, and other aquatic invasive species.

The marina also coordinates with local organizations and stakeholders, including the Tahoe Keys Beach and Harbor Association, Tahoe Keys Property Owners Association, and the League to Save Lake Tahoe, to support AIS monitoring and management within the shared lagoon system. These efforts complement broader regional AIS management

programs and support implementation of the Lake Tahoe Aquatic Invasive Species Management Plan and attainment of regional environmental thresholds.

c. Include a public education component.

Rationale: The marina has integrated public outreach into its daily operations to promote boater compliance with aquatic invasive species (AIS) prevention measures. This includes educational signage throughout the facility and informational materials provided to boaters as part of the launch process. The marina also holds a Clean Marina Certification (effective 2024–2029), which requires ongoing staff training and public outreach related to pollution prevention, environmental stewardship, and aquatic invasive species management. These educational efforts help increase awareness of AIS risks and prevent the introduction and spread of aquatic invasive species within the Tahoe Keys lagoon system and Lake Tahoe.

84.6.2.B.2 Minor Projects. Minor projects may be approved if TRPA makes the following findings:

a. The marina has an approved aquatic invasive species control plan;

Rationale: TRPA approved an Aquatic Invasive Species (AIS) Management Plan for Tahoe Keys Marina in November 2024 (MAIS2024-0003) and approved an updated plan in November 2025 (MAIS2025-0007). The AIS Management Plan remains in effect and satisfies the requirements of Section 84.6.2.B.

b. The marina has a current NPDES permit with Lahontan, if applicable;

Rationale: The marina maintains coverage under a current National Pollutant Discharge Elimination System (NPDES) Industrial General Permit issued by the Lahontan Regional Water Quality Control Board. Compliance with the permit is required as a condition of ongoing marina operations and supports implementation of stormwater management and pollution prevention measures at the site.

c. The marina has a current lease with State Lands, if applicable;

Rationale: This finding is not applicable because the project area is not located on lands subject to the jurisdiction of the California State Lands Commission and is not subject to a State Lands lease. The California State Lands Commission reviewed the project and determined that it does not have jurisdiction over the project area.

d. The marina has received a Clean Marina Certification recognized by TRPA; and

Rationale: Tahoe Keys Marina received a Clean Marina Certification effective April 25, 2024, through April 25, 2029. The certification is recognized by TRPA and demonstrates the marina's commitment to implementing best management practices for environmental stewardship, pollution prevention, and marina operations.

e. The marina has a BMP certificate in good standing from TRPA.

Rationale: Pursuant to the 2024 Governing Board-approved Settlement Agreement, Suntex submitted an interim Best Management Practices (BMP) plan to TRPA on February 4, 2025. The plan was approved as part of the dock reconstruction project (TRPA File ERSP2024-1889) and implemented in 2025. TRPA conducted a final inspection on December 23, 2025, confirming successful installation of the required BMPs. TRPA has

determined that the marina is in good standing with BMP requirements based on implementation of the approved interim BMP plan and the applicant's continuing obligation to complete permanent BMP improvements through the proposed redevelopment project. A permanent BMP plan will be implemented as part of the proposed redevelopment project.

84.6.2.B.3 Major projects may be approved if TRPA makes the following findings:

a. All requirements for minor projects as set forth in subsection 84.6.2.B.2 are met; and
b. One or more of the following environmental improvements has been completed at the marina or is included in the proposed major project. The environmental improvements shall be prioritized for each marina to provide the greatest environmental benefit.

(i) Demonstration of water flow improvements, if applicable;

Rationale: This improvement is not applicable because the project is located within an existing man-made marina lagoon and does not propose modifications intended to alter water circulation or flow between the Tahoe Keys lagoon system and Lake Tahoe. Other environmental improvements listed in Section 84.6.2.B.3.b are included in the project and provide greater project-specific environmental benefit.

(ii) Reduction of aquatic invasive species habitat conditions;

Rationale: The proposed bulkhead design will improve shoreline conditions and is intended to support long-term marina maintenance in a manner that reduces shallow-water conditions that commonly support aquatic invasive species (AIS) habitat within the Tahoe Keys lagoon system. By improving depth conditions along the bulkhead and avoiding creation of new shallow-water habitat, the project is expected to reduce the extent of nearshore AIS habitat over the long term. In addition, the project incorporates implementation of an approved AIS Management Plan, including monitoring, control measures, and technologies designed to reduce existing infestations and limit the spread of AIS. These measures are expected to reduce AIS habitat conditions and improve long-term management of aquatic invasive species within the marina.

(iii) Reduced need for dredging;

Rationale: Relocation of the boat launch to the southern end of the lagoon channel will reduce the long-term need for maintenance dredging. The southern portion of the channel experiences less sediment deposition and has a more favorable depth than the existing northern launch location. As a result, the relocated launch is expected to remain functional with less frequent dredging and reduced maintenance requirements. Although periodic dredging may still be necessary due to lake levels, wave action, and ongoing sediment transport processes, the project is expected to reduce the frequency and extent of dredging over time.

(iv) Provision of a boating rental and operations fleet 80% of which meets or exceeds the most current EPA and/or CARB standards;

Rationale: Pursuant to the 2024 Settlement Agreement and the redevelopment permit, Suntex is required to submit a final Marina Concessions Plan by October 1, 2027. The plan must identify the marina's rental and operations fleet and demonstrate that at least 80 percent of the covered fleet meets or exceeds the most current EPA and/or California Air Resources Board (CARB) standards. Compliance with this requirement will be verified through review and approval of the final Marina Concessions Plan.

(v) Access improvements pursuant to the Americans with Disabilities Act;

Rationale: The project includes access improvements consistent with the Americans with Disabilities Act (ADA). As part of the recent dock replacement project, new accessible gangways and associated landings were constructed at four locations throughout the marina, improving access to marina facilities and watercraft.

The proposed upland redevelopment further enhances accessibility through the construction of accessible pedestrian routes connecting public rights-of-way, parking areas, public amenities, and building entrances. Accessible parking spaces, compliant building entrances, and elevators serving second-floor uses are also included as part of the project. These improvements expand accessible access throughout the marina and improve access to recreational opportunities for individuals with disabilities.

(vi) Provision of facilities related to boater education of 600-foot no wake zone, boater safety, and clean boating practices;

Rationale: The marina provides boater education related to the 600-foot no-wake zone, boating safety, and clean boating practices through posted signage, informational materials, and staff interactions during the registration and launch process. Educational materials are made available at marina facilities and are intended to promote safe boating practices, protection of water quality, and compliance with Lake Tahoe boating regulations. These measures support ongoing boater awareness and environmental stewardship throughout marina operations.

(vii) Provision of public access to marina fueling and/or pump-out stations;

Rationale: The redevelopment project includes continued public access to marina fueling and pump-out facilities. Existing fueling and sewage pump-out facilities will be relocated to the southern portion of the marina adjacent to the relocated boat launch to improve circulation and access for the boating public. The marina will continue to provide two sewage pump-out stations and a vessel waste disposal facility connected to the local sanitary sewer system.

(viii) Installation of stormwater BMPs that treat runoff volumes above existing TRPA and, if in California, Lahontan RWQCB requirements, provided that the proposed BMPs are, at a minimum, proportional to the proposed project impacts;

Rationale: The project includes the installation of a stormwater Best Management Practices (BMP) system that will provide permanent water quality improvements throughout the marina. The redevelopment incorporates stormwater treatment and infiltration facilities, permeable paving, and other source control measures designed to capture, treat, and infiltrate runoff generated by the project. These improvements replace existing

conditions with a modern stormwater management system that meets or exceeds applicable TRPA and Lahontan Regional Water Quality Control Board requirements.

The proposed BMPs are proportional to the scale and impacts of the redevelopment project and will provide long-term water quality benefits through improved treatment of stormwater runoff before discharge to the surrounding watershed.

(ix) Provision of additional scenic improvements, such as screening of storage racks;

Rationale: Although the project area is not visible from designated scenic roadways, designated public recreation areas, or designated scenic bicycle paths, and has only limited and distant visibility from certain Lake Tahoe shoreline viewpoints, the redevelopment incorporates substantial scenic improvements. The project replaces outdoor boat storage areas with enclosed storage facilities, reducing visual clutter and improving the overall appearance of the marina. Additional scenic improvements include extensive landscaping, modern mountain-style architecture, coordinated building materials and colors, and a more organized site layout that consolidates marina operations and public uses.

(x) Provision of existing boat ramps for public use. If a ramp is not functional for motorized boating due to low lake level conditions, provide access for non-motorized boaters;

Rationale: The project includes relocation of the existing public boat launch to the southern end of the marina, where it will continue to provide public access for motorized boating. The southern location provides more favorable depth conditions and is less susceptible to sediment accumulation than the existing launch location, improving functionality and reliability during periods of low lake levels.

The project also provides facilities supporting non-motorized boating, including public access to the waterfront promenade and dedicated storage areas for non-motorized watercraft.

(xi) Provision of dedicated access for non-motorized boaters;

Rationale: The project provides dedicated public access for non-motorized boaters through a designated launch and access area adjacent to the dockmaster building, as shown on Plan Sheet L3.2. The dedicated access area is intended to facilitate launching and retrieval of non-motorized watercraft while providing safe and convenient access to the lagoon system. A condition of approval requires the final plans to clearly identify and label the non-motorized launch and access area to ensure its visibility and continued public accessibility.

(xii) Provision of non-motorized boat storage for public;

Rationale: The project provides public storage facilities for non-motorized watercraft. Public storage racks for kayaks, paddleboards, and other non-motorized watercraft will be located at multiple locations throughout the site, as shown on Plan Sheet L0.6. These facilities support public access to the lagoon system and encourage non-motorized recreation by providing convenient on-site storage for users.

(xiii) Installation of an electric charging station for cars;

Rationale: The project includes infrastructure to support electric vehicle charging and future electric boat charging. Liberty Utilities is currently reviewing available electrical capacity and infrastructure requirements. The redevelopment permit requires installation of electric vehicle charging stations if sufficient electrical capacity is confirmed through final utility design, and otherwise requires conduit or other charging-ready infrastructure to facilitate future installation when capacity becomes available.

(xiv) Reduction of on-site coverage; or

Rationale: The project results in a net reduction of 1,348 square feet of land coverage. The reduction in coverage increases the area available for stormwater infiltration and contributes to improved water quality conditions within the project area.

(xv) Implementation of a green infrastructure project.

Rationale: The project implements green infrastructure through permeable paving, permanent stormwater treatment, and infiltration systems. Additional green infrastructure features include the vegetated Basin Plaza, which incorporates subsurface stormwater capture and treatment infrastructure, and landscaped parking lot medians designed to intercept and infiltrate runoff while improving site aesthetics and environmental performance.

c. For a major project that proposes expansion of use by 15 or more mooring structures, all applicable improvements listed in subsection 84.6.2.B.3.b shall be required. For a major project that proposes expansion of use by less than 15 mooring structures, the greater the number of moorings proposed, the greater the number of applicable improvements listed in 84.6.2.B.3.b shall be required. For all major projects, the greater the cost and scope of the project, the greater the number of applicable improvements listed in subsection 84.6.2.B.3.b shall be required. TRPA shall develop marina improvement guidelines to implement this provision.

Rationale: Consistent with the scale and scope of the project, the redevelopment incorporates all applicable marina improvements identified in subsection 84.6.2.B.3.b, including aquatic invasive species management measures, reduced dredging needs, ADA accessibility improvements, public fueling and pump-out facilities, non-motorized boating access and storage, stormwater treatment infrastructure, scenic improvements, reduced land coverage, and green infrastructure.

84.6.3.D.2 Existing marina boat ramps may be reconstructed, relocated, or modified according to the following provisions:

a. Marina boat ramps may be relocated on the same parcel if the relocation is determined to improve water access during periods of low lake levels, all impacts are mitigated to the maximum extent, and the development standards listed in subsection 84.6.3.A are met; and

Rationale: The existing boat ramp will be relocated to the southern portion of the project area on the same parcel. The southern location provides improved water access during periods

of low lake levels because it experiences less sediment deposition and maintains more favorable depth conditions than the existing northern ramp location. As a result, the relocated ramp is expected to provide more reliable boating access and reduce the need for maintenance dredging.

Potential environmental impacts associated with ramp relocation have been mitigated to the maximum extent practicable. Construction activities will be subject to Best Management Practices (BMPs), including turbidity controls, spill prevention measures, and erosion and sediment control measures designed to protect water quality. In addition, the project incorporates permanent stormwater treatment and infiltration facilities and other environmental improvements that reduce potential impacts to Lake Tahoe and the lagoon system. As conditioned, the relocated ramp will comply with the applicable development standards in subsection 84.6.3.A.

b. Marina boat ramps may be extended lakeward in order to operate during periods of low lake levels, provided the applicant demonstrates such extension is feasible and shall be the minimum necessary to provide reasonable access, down to elevation 6,220 feet Lake Tahoe Datum.

Rationale: The project addresses low lake level access through relocation of the existing boat launch rather than extension of the existing facility lakeward. The existing ramp at the northern end of the marina will be removed and reconstructed at the southern end of the project area, where more favorable depth conditions and reduced sediment deposition provide improved access during periods of low lake levels.

The relocated ramp is designed to provide reliable boating access while maintaining the existing two-lane launch capacity. Because the southern location experiences less siltation and fewer depth constraints, relocation provides a feasible long-term solution for low-water access without the need for lakeward extension or frequent maintenance dredging.

The project also includes an indoor boat storage facility with a valet launch system that operates independently of the public boat ramp, reducing demand on the launch facility. By utilizing existing deeper-water conditions within the lagoon, the project achieves the objective of improving low-water access while minimizing in-water disturbance and avoiding the need for extension of the ramp farther into the lagoon.

STATEMENT OF NO SIGNIFICANT EFFECT

Project Description: Approval of the Tahoe Keys Marina Redevelopment Project and Proposed Amendments to the TRPA Code of Ordinances Chapters 37 and 90

Staff Analysis: In accordance with Article IV of the Tahoe Regional Planning Compact, as amended, and Section 6.6 of the TRPA Rules of Procedure, TRPA staff reviewed the information submitted with the subject project.

Determination: Based on the Initial Environmental Checklist, Agency staff found that the subject project will not have a significant effect on the environment.

_____ _____

TRPA Chairman or Executive Director Date