From: Sarah G. Vidra <sgv@ivgid.org>
Sent: 8/25/2026 2:43:10 PM
To: Public Comment <PublicComment@trpa.gov>
Cc: Kate S. Nelson <ksn@ivgid.org>; Cameron McKay <lakeskater@msn.com>;
Subject: TWSA Comment - Environmental Improvement Program Committee - Item 5.a 8/26/2026
Attachments: TWSA_Public_Comment_Caldor_Fire_Restoration_Herbicide_Use_2026-08-25.pdf

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Good afternoon,

On behalf of the Tahoe Water Suppliers Association (TWSA), I have attached TWSA's comment letter regarding the U.S. Forest Service's Caldor Fire Restoration Project and potential future herbicide use associated with terrestrial reforestation activities.

TWSA appreciates the opportunity to provide input and encourages continued coordination among TRPA, the U.S. Forest Service, regulatory agencies, water suppliers, and other stakeholders to ensure protection of Lake Tahoe and drinking-water sources as restoration planning proceeds.

Please include TWSA's comment letter in the record for the August 26, 2026, Environmental Improvement Program Committee meeting.

Regards,

Sarah Vidra
Executive Director, Tahoe Water Suppliers Association
Source Water Protection Specialist, Incline Village GID
1220 Sweetwater Road, Incline Village, Nevada 89451
Office: 775-832-1284
Cell:775-413-4161
sgv@ivgid.org

Tahoe Water Suppliers Association
Protect the Source

1220 Sweetwater Road

Incline Village, Nevada 89451

775-832-1284

TWSA Members:
Cave Rock Water System
Edgewood Water Company
Glenbrook Water Cooperative
Incline Village GID
Kingsbury GID
Lakeside Park Association
North Tahoe PUD
Round Hill GID
Skyland Water Company
South Tahoe PUD
Tahoe City PUD
Zephyr Water Utility

August 25, 2026

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

Re: Caldor Fire Restoration Project – Potential Herbicide Use

Dear Chair and Members of the Environmental Improvement Program Committee:

The Tahoe Water Suppliers Association (TWSA) appreciates the opportunity to provide comment regarding the U.S. Forest Service's Caldor Fire Restoration Project and the potential future use of herbicides associated with reforestation activities.

TWSA recognizes the importance of post-fire restoration and reforestation within the Caldor Fire burn area. We also appreciate the U.S. Forest Service's confirmation that no herbicide applications will occur during the 2026 or 2027 field seasons. As project planning continues, TWSA recommends that protection of Lake Tahoe and drinking-water sources remain an important consideration in evaluating any future chemical treatment.

TWSA recommends the following:

- Continue to evaluate and prioritize non-chemical and integrated vegetation-management approaches where feasible.
- Provide advance notification and coordination with affected water suppliers before any future herbicide application within the Tahoe Basin, particularly where an application could have a pathway to surface water or drinking-water sources.
- Conduct appropriate monitoring and documentation of future applications to evaluate potential impacts on source-water quality and inform future management decisions.
- Maintain coordination among the U.S. Forest Service, TRPA, Lahontan Regional Water Quality Control Board, Nevada Division of Environmental Protection, water suppliers, and other appropriate agencies as treatment plans are developed.

- Ensure that any future chemical treatment incorporates appropriate site-specific protections for surface water, groundwater, and other sensitive resources.

TWSA recognizes that the potential herbicide use identified in the Caldor Fire Restoration Project is associated with terrestrial reforestation activities and is separate from aquatic herbicide use in Lake Tahoe. TWSA's comments are limited to the potential impacts of terrestrial herbicide applications on Lake Tahoe and drinking-water sources and do not alter the Association's existing position regarding aquatic herbicide use in Lake Tahoe waters.

TWSA appreciates TRPA's continued coordination with the U.S. Forest Service and other agencies on the Caldor Fire Restoration Project. We encourage TRPA to continue emphasizing protection of Lake Tahoe's water quality and drinking-water sources as restoration planning and treatment strategies are developed.

Sincerely,

Sarah Vidra
Executive Director
Tahoe Water Suppliers Association

CC: Kate Nelson; Incline Village General Improvement District
Cameron McKay; Glenbrook Water Cooperative
Tom White; Douglas County Public Works
Brandon Garden; Round Hill General Improvement District
Derek Dornbrook; Kingsbury General Improvement District
Patrick McKay; Edgewood Water Company
Nakia Foskett; Lakeside Park Association
Dan Lewis; Tahoe City Public Utility District
Joe Pomroy; North Tahoe Public Utility District
Shelly Thomsen; South Tahoe Public Utility District

From: Barbara Wanner <barbararegina.wanner@gmail.com>
Sent: 8/25/2026 1:22:26 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: STOP the use of GLYPHOSATE

Greetings,

I am writing to you with utmost concern about the use of Glyphosate in the form of Round-Up weed killer sprayed in our national forests, especially here in my home state of California. I urge you to stop the practice of suppressing new plant growth after forest fires with Round-up or any weed killer. Round-up contains Glyphosate which is widely acknowledged to be a known carcinogenic. It will end up in our ground water and our food and will stick around to haunt us for generations. Another reason NOT to spray weed killer on new plants is that this fore succession of plants is the natural cycle of recovery after fires. Any time we humans try to improve on what nature does, we create a host of unintended and possibly far reaching negative consequences.
So I urge you to please listen to my voice and the voice of my whole family. We all live, work and recreate in these forests.

Sincerely,

Barbara Wanner
PO Box 65
Lee Vining, CA

From: Tobi Tyler <tylertahoe1@gmail.com>
Sent: 8/25/2026 12:48:34 PM
To: Public Comment <PublicComment@trpa.gov>; Aaron Gagnon <aaron.gagnon@usda.gov>
Cc: Rosalie Herrera <rosalie.herrera@usda.gov>;
Subject: Sierra Club comments on Glyphosate Use in the Tahoe Basin
Attachments: Glyphosate Ltr to TRPA and LTBMU 8.24.26.pdf

Please see the Sierra Club Tahoe Area Group's attached comments on the use of glyphosate in the Tahoe Basin.
Tobi Tyler
Vice Chair, Tahoe Area Group

SIERRA CLUB
Tahoe Area Group

August 24, 2026

Via email to: publiccomment@trpa.gov and aaron.gagnon@usda.gov

Tahoe Regional Planning Agency
128 Market Street
Stateline, NV 89449

Lake Tahoe Basin Management Unit
Aaron Gagnon, Acting Forest Supervisor
35 College Drive
South Lake Tahoe, CA 96150

Re: TRPA Governing Board Meeting Public Comment – Opposition to the Use of Glyphosate and Other Herbicides in Tahoe Basin Forest Restoration Projects

Dear Governing Board Members and Acting Forest Supervisor Gagnon,

The Tahoe Area Group of the Sierra Club encourages the Tahoe Regional Planning Agency (TRPA) and the Lake Tahoe Basin Management Unit (LTBMU) of the US Forest Service to eliminate the planned use of glyphosate and other herbicides in LTBMU's Caldor Restoration Project for 2028 and other Lake Tahoe Basin Projects on US Forest Service land. We offer the following comments as the basis for this elimination.

There are effective, safer, and more regenerative alternatives to herbicide application, including manual vegetation management and allowing natural ecological succession. These approaches restore forest resilience without introducing toxic chemicals into one of the nation's most environmentally sensitive watersheds.

The primary advantage of glyphosate and other herbicides is economic – it reduces short-term vegetation management costs. However, cost savings alone do not justify the environmental risks associated with its use as described below. Glyphosate and other herbicides are not necessary for successful post-fire forest recovery. Research has shown that tree seedlings often benefit from the shelter provided by shrubs and other early-seral vegetation, which moderate temperature extremes, retain soil moisture, and protect young trees during establishment. Allowing forests to regenerate naturally over time produces a more diverse and resilient ecosystem than artificially creating even-aged stands of trees. "Post-wildfire recovery of forest vegetation, soil, and hydrological responses: A review." Earth-Science Reviews, Volume 277, June 2026, 105452.

A forest composed primarily of trees of the same age is not a healthy, functioning ecosystem. Such monocultures are characteristic of timber production rather than ecological restoration. The Lake Tahoe Basin should be managed to maximize biodiversity, watershed protection, wildlife habitat, and long-term ecosystem resilience – not to create timber plantations.

The potential scale of herbicide application is also concerning. According to reporting by the Center for Biological Diversity, between 2017 and 2020, the U.S. Forest Service applied 938,732 pounds of pesticide products across approximately 1,467,944 cumulative acres of National Forest lands, averaging roughly 0.64 pounds per acre. Applying that average rate to approximately 3,600 acres that could be treated in the Tahoe Basin suggests that more than 2,300 pounds of herbicide could be applied. Because President Trump recently issued an Executive Order invoking the Defense Production Act to expand domestic production of glyphosate, actual future application rates could be substantially higher if increased availability leads to expanded use.

Monitoring herbicide use, while important, is not an adequate safeguard. Agencies cannot manage what they do not measure, but measurement alone does not prevent environmental harm. Monitoring will not prevent glyphosate and other herbicides from entering streams, wetlands, or groundwater. It will not prevent damage to soil microbial communities and mycorrhizal fungi that are essential for healthy forest recovery. It will not prevent the loss of root systems that stabilize soils and reduce erosion, nor will it prevent reductions in carbon sequestration resulting from the elimination of native vegetation. Finally, monitoring cannot eliminate potential human health risks associated with exposure to a chemical that continues to be the subject of significant scientific and regulatory debate regarding carcinogenicity.

Equally concerning is the absence of robust accountability measures. As stated in this article in Capital Weekly, *"No western state currently ties restoration bond expenditures to compound-specific baseline monitoring requirements,"* indicating that agencies are spending public restoration funds without establishing comprehensive baseline conditions against which the environmental effects of herbicide applications can be evaluated. Without baseline monitoring and long-term ecological assessment, agencies cannot credibly demonstrate that herbicide use is consistent with restoration objectives or that it avoids long-term harm.

LTBMU has shown that it is inadequately equipped or prepared to design and implement a robust monitoring plan for 3,600 acres. Numerous water quality violations issued by the Lahontan Water Quality Control Board over the last 20 years have proven this. Also, see Thomas Suk's comments dated July 21, 2026, which are herein incorporated by reference.

The Lake Tahoe Basin is internationally recognized for its exceptional water quality, biodiversity, and ecological significance. Forest restoration should strengthen these values, not compromise them through the unnecessary use of herbicides. Before any chemical vegetation management is authorized, agencies should demonstrate that non-chemical alternatives have been fully evaluated

and found infeasible, and that any proposed herbicide application is supported by rigorous, site-specific scientific analysis.

Environmental Risks Associated With the Use of Glyphosate and Other Herbicides

1. Loss of Native Biodiversity

Glyphosate is non-selective and kills most broadleaf plants and grasses. While intended to suppress competing vegetation, it also eliminates many native species that stabilize soils after a wildfire, produce berries and seeds for birds and mammals, provide nectar and pollen for native bees and butterflies, contribute to diverse forest structure, and shift forests toward conifer monocultures with reduced understory diversity. "Experimental evaluation of herbicide use on biodiversity, ecosystem services and timber production trade-offs in forest plantations." Journal of Applied Ecology. 29 May 2021, https://doi.org/10.1111/1365-2664.1393.

2. Harm to Pollinators

In burned forests, flowering shrubs are often among the first plants to recover and are especially valuable for pollinators. Glyphosate removes flowering plants that pollinators depend upon, thereby reducing native bee and butterfly abundance, lowering habitat quality, and decreasing food resources for native species. "Sublethal glyphosate exposure reduces honey bee foraging and alters the balance of biogenic amines in the brain." Journal of Experimental Biology, Volume 228, Issue 9, May 2025.

3. Wildlife Habitat Degradation

Removing shrubs and flowering plants, such as ceanothus, manzanita, bitterbrush and willow that provide nesting habitat, thermal cover, forage, and insect production negatively affects songbirds, deer, black bears, small mammals, reptiles and amphibians. Post-fire "competing vegetation" species are actually important components of healthy forest succession. "The Unintended Consequences of Using Glyphosate (the main ingredient in the herbicide Roundup)." Sharon Rushton, Ann Spake, and Laura Chariton. January, 2016.

Furthermore, modern forest ecology recognizes that post-fire shrubs are not simply "weeds." Species such as ceanothus fix atmospheric nitrogen, improve soil fertility, shade young conifers, reduce erosion, and provide wildlife habitat. Removing them can interrupt natural recovery processes.

4. Soil Health

Research indicates glyphosate can affect soil biology by altering microbial communities, reducing mycorrhizal fungi, altering nitrogen cycling, and reducing decomposition rates. Healthy soil fungi are particularly important for conifer regeneration. See Florido, F.G. et al. (2022). "A comprehensive experimental assessment of glyphosate ecological impacts in riparian forest restoration." Ecological Applications 32:e2472. "Glyphosate-based herbicides alter soil carbon and phosphorus dynamics and microbial activity." Applied Soil Ecology, Volume 169, January 2022, 104256.

5. Water Quality Risks

Water quality risks in watersheds include contaminant transport as glyphosate attaches to eroded soil and sediment and moves into streams that drain to Lake Tahoe. Meadows, wetlands, and ephemeral drainages can also become contaminated. Accidental overspray into waterways can also occur. Although glyphosate generally binds to sediment, post-fire landscapes often experience severe erosion, increasing transport potential. "Exposure risk and environmental impacts of glyphosate: Highlights on the toxicity of herbicide co-formulants." Environmental Challenges, Volume 4, August 2021, 100149.

The phosphorus in glyphosate has also been found to stimulate growth of harmful algal species. "Low-dose stimulation of growth of the harmful alga, *Prymnesium parvum*, by glyphosate and glyphosate-based herbicides." Harmful Algae, December 2018, 130-139, Volume 80. For watersheds such as Lake Tahoe – where protecting exceptional water clarity is a primary management objective – even small increases in pollutant loading warrant scrutiny.

6. Aquatic Species

Glyphosate formulations often contain surfactants that can be more toxic than glyphosate itself. If overspray or soils contaminated with glyphosate erode into waterways, aquatic species can also be affected, causing amphibian mortality, impacts to aquatic invertebrates, and reduced food sources for fish. Even though the Caldor project prohibits the use of aquatic formulations near streams, drift and contaminated soil runoff remain significant concerns, warranting the use of other alternatives. "An integrated review of glyphosate ecotoxicity and environmental fate in aquatic systems using species sensitivity distributions and meta-analysis." Pesticide Biochemistry and Physiology, Volume 219, April 2026, 107025.

7. Carbon Storage

Many shrubs removed with herbicides continue storing carbon and contribute organic matter to soils. Eliminating them reduces aboveground biomass, slows soil carbon accumulation, and decreases ecosystem resilience. Although herbicide use may accelerate conifer growth, the net carbon benefit depends on site-specific conditions and remains an area of scientific debate. Thus, alternatives other than chemicals should be used.

8. Increased Fire Concerns

Removing green understory vegetation can also increase the abundance of dry grasses, increasing the risk of fast-moving fires. Exposed soil reduces moisture retention, further exacerbating future fire risks in the area. Donato, D.C., et al. (2006). "Post-wildfire logging hinders regeneration and increases fire risk." Science 2006 Jan 20;311(5759):352. doi: 10.1126/science.1122855. Epub 2006 Jan 5.

9. Human Health Concerns

In July 2017, California's Office of Environmental Health Hazard Assessment (OEHHA) added glyphosate to its **Proposition 65 list** of chemicals "known to the state to cause cancer". Under

California law, OEHHA was required to add the chemical after the World Health Organization's IARC labeled it a "probable carcinogen". Although human health remains one of the most debated aspects of glyphosate, there is no doubt that it is not a suitable restoration alternative for the Lake Tahoe Basin. "Glyphosate Pollution Treatment and Microbial Degradation Alternatives, a Review." Microorganisms. 2021 Nov 10;9(11):2322. doi: 10.3390/microorganisms9112322. PMID: 34835448; PMCID: PMC8625783.

10. Worker Health and Environmental Justice

The occupational health impacts on workers tasked with mixing, handling, and applying glyphosate and other herbicides must also be considered. Forest restoration projects frequently rely on seasonal or contracted labor, where levels of training, supervision, and experience may vary considerably. These workers often perform physically demanding jobs under extreme heat, steep terrain, and remote conditions, all of which increase the likelihood of mistakes, equipment failures, and chemical exposure. Forest and conservation work is already recognized as having one of the highest occupational injury and illness rates in the United States.

Although pesticide labels and regulations require personal protective equipment (PPE), the effectiveness of that protection depends on rigorous training, proper equipment, careful supervision, and consistent compliance. Federal and California pesticide safety regulations recognize that pesticide handlers require specialized instruction, appropriate PPE, medical evaluations when respirators are required, and ongoing oversight to reduce occupational exposure.

LTBMU should not assume perfect compliance with label requirements. Real-world forestry operations occur in windy conditions, rugged terrain, and remote locations where spray drift, equipment leaks, spills, and dermal or inhalation exposure are possible. Occupational exposure to glyphosate has been documented among forestry workers, demonstrating that applicators represent the population at greatest potential risk of exposure.

The agencies should also recognize that contract crews may be economically vulnerable. Workers paid by the acre or under tight production schedules may feel pressure to continue spraying despite equipment failures, inadequate protective gear, fatigue, or unsafe weather conditions. Such pressures can undermine the assumptions of safe chemical handling that underlie regulatory risk assessments.

The burden of these risks falls disproportionately on the workers performing the restoration – not on the agencies authorizing herbicide use. A true restoration program should not depend on exposing workers to avoidable chemical hazards when effective non-chemical alternatives, including manual vegetation management and natural forest regeneration, are available. The safest exposure is the one that never occurs.

Summary

Peer-reviewed ecological research increasingly recognizes that post-fire shrub communities are an essential component of forest recovery rather than an obstacle to restoration. Early-seral vegetation

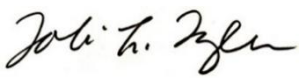
stabilizes soils, reduces erosion, moderates microclimate, fixes nitrogen, supports pollinators and wildlife, and often facilitates conifer establishment. Conversely, intensive vegetation removal through herbicide application can alter soil microbial communities, leave glyphosate and other herbicide residues in runoff sediments, reduce native plant diversity, and simplify naturally recovering ecosystems. Rather than accelerating ecological restoration, broadcast herbicide application risks replacing a diverse, climate-resilient post-fire landscape with an artificially managed, even-aged conifer plantation that more closely resembles a timber production system than a naturally functioning Sierra Nevada Forest.

LTBMU must prioritize the protection of Lake Tahoe's exceptional water clarity. The increased sediment transport, risks to municipal water supplies and groundwater, effects on rare Sierra Nevada plant communities, potential conflicts with Total Maximum Daily Load (TMDL) objectives, and compliance with the Tahoe Regional Planning Compact's requirement to maintain or improve environmental threshold carrying capacities requires LTMBU to choose other alternatives.

Because the Tahoe Basin contains one of the world's most sensitive alpine watersheds, herbicide use should be used only where there is clear evidence that non-chemical alternatives are infeasible. Forest managers can often use integrated vegetation management approaches, including manual cutting or grubbing, targeted grazing where appropriate, mulching, and prescribed fire under suitable conditions. Glyphosate and other herbicide use converts a biologically rich early-seral landscape – one that supports many native plants and wildlife – into a more homogeneous plantation. True ecological restoration should maintain native biodiversity, natural successional processes, and watershed functions, rather than focusing primarily on timber production or conifer stocking.

For these reasons, I urge the responsible agencies to prohibit the use of glyphosate and other herbicides listed for use in the Caldor plan and in other Tahoe Basin Forest restoration projects and instead prioritize restoration methods that protect water quality, preserve biodiversity, support natural forest regeneration, protect workers, and ensure the long-term health and resilience of this unique and cherished ecosystem.

Sincerely,



Tobi Tyler
Tahoe Area Group, Sierra Club

Cc: Rosalie Herrera, Deputy Forest Supervisor (rosalie.herrera@usda.gov)

From: Katherine Levy <katherinelevymv@gmail.com>
Sent: 8/25/2026 2:34:24 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public Comment: EIP Agenda Item 5.A., Herbicide Use Associated with the Caldor Fire Restoration Project

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Disclosure: I am a Tahoe Vista resident whose household drinking water is supplied through a North Tahoe Public Utility District (NTPUD) intake from Lake Tahoe. I submitted public comment on this matter to TRPA on May 27, 2026. That comment does not appear in the posted meeting materials; my request that it be entered into the record appears at the end of the original public comment.

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Lake Tahoe receives approximately 15 million annual visits. Tourism and outdoor recreation drive the Tahoe Region's approximately $5 billion annual economy, according to TRPA. [TRPA, Sustainable Recreation and Tourism Partnership RFP, June 14, 2021, p. 6; TRPA, Sustainable Transportation Funding Initiative: Revenue Options Report, May 2022, p. 3.]

People who live here drink this water, recreate in it, and depend on it for their homes, gardens, businesses, and public water systems. The condition of Lake Tahoe and its tributaries is a public-health, environmental, and economic issue.

I grew up on this lake. Summers at Sand Harbor. Fishing for crayfish from the rocks at Speedboat Beach. Tahoe was my first love. I finally moved here a year ago. The water from my tap is drawn directly from Lake Tahoe through an NTPUD intake at the end of National Avenue in Tahoe Vista.

After learning in April 2026 that herbicides could be used in connection with the Caldor Fire Restoration Project, I began researching the issues facing this lake and reviewing the project record. I have obtained and reviewed primary documents — the agency's own files — that contain findings not addressed in today's staff report.

This comment distinguishes among three separate actions: the Caldor Fire Restoration Project authorization at issue before this committee; reported glyphosate treatments in the Eldorado National Forest near Plummer Ridge and Leoni Caldor Road, whose connection to Lake Tahoe tributaries has not been established in the materials reviewed; and the separate June 25, 2026 invasive-plant treatment near Kiva Beach. The Kiva Beach treatment is discussed only as a documented example of the Forest Service's notice practice, not as part of the Caldor Fire Restoration Project.

The Forest Service's March 27, 2026 Decision Notice for the Caldor Fire Restoration Project authorizes herbicide use in specified treatment areas over a 10- to 15-year period. [Decision Notice, p. 1.] As described, the authorization does not require a pre-application, project-specific baseline against which the public and decision-makers could assess whether treatment-related changes occurred in receiving-water quality.

According to the Caldor Fire Restoration Project Recreation Effects Analysis, the Lake Tahoe Basin Management Unit (LTBMU) receives approximately 7.7 million recreation visits each year. The analysis identifies the Corral Trail, Sierra Sidewinder, Twisted Cedar Trail, Armstrong Pass Trail, Saxon Creek Trail (also known as Mr. Toad's Wild Ride), and a portion of the Pacific Crest Trail among the recreation resources in the project area.

Forest Service public affairs specialist Lisa Herron confirmed in a July 10, 2026, email that the authorization does not require advance public notice before individual herbicide applications. The authorization contains no requirement for notice identifying when an application will occur, where treatment will take place, or what herbicide will be used. [Lisa Herron email, July 10, 2026, available on request.]

The staff report states that no herbicide applications will occur during the 2026 or 2027 field seasons. It does not address the separate glyphosate treatments reported in the Eldorado National Forest near Plummer Ridge and Leoni Caldor Road. A Tahoe Daily Tribune report, citing the Forest Service's own FAQ, stated that some areas had been treated and could receive treatment over the next five to 10 years. [Tahoe Daily Tribune, June 29, 2026.]

The materials reviewed for this comment do not include a Forest Service treatment-unit map or watershed analysis identifying the locations, receiving drainage, and hydrologic connection of those reported treatment areas to Lake Tahoe tributaries. Administrative boundaries do not answer that question. Before treating any Eldorado area as relevant to Tahoe Basin water quality, the Forest Service should identify the treatment area, receiving drainage, and hydrologic connection in the public record.

Glyphosate was applied in the Lake Tahoe Basin on June 25 in a separate invasive-plant treatment near Kiva Beach. The Forest Service said an aquatic formulation of glyphosate was spot-applied to 10 yellow toadflax plants approximately 20 feet from waterways under the Lake Tahoe Basin Management Unit's Terrestrial Invasive Plant Species Environmental Assessment. The agency said a treatment sign was posted on June 25 and required to remain in place for at least 48 hours. That is an on-site notice to visitors during and after treatment. The public record does not show advance notice to nearby residents, trail users, water purveyors, or the broader community before the application occurred. (Petra Molina, "Forest Service explains glyphosate caution sign after online speculation," Tahoe Daily Tribune, July 23, 2026.)

In a model of a child's potential drinking-water exposure, Stantec calculated hazard quotients above 1 for all three herbicides: 162 for triclopyr, 23 for hexazinone, and 8 for glyphosate. Stantec described these as conservative screening estimates unlikely to occur because the same locations would not be treated with herbicides every year. These are model estimates, not measurements of actual exposure in the field. The assessment does not identify a more location-specific analysis of those higher-end scenarios. [Stantec Consulting, Human Health Risk Assessment, March 2026, pp. 10–11.]

The assessment's characterization of those scenarios as unlikely rests on the assumption that the same locations will not be treated annually. Before any future

herbicide application in Tahoe-connected treatment areas, TRPA should request a public, location-specific monitoring and reporting plan so the board and public can evaluate actual conditions, not models alone.

The risk assessment cites Williams, Kroes, and Munro (2000) in its evaluation of polyoxyethylene tallow amine, or POEA, a surfactant associated with some glyphosate formulations. That article was retracted in November 2025, nearly four months before the Forest Service signed its March 27, 2026 Decision Notice, and the record reviewed for this comment does not identify a post-retraction review addressing whether the retraction affects the specific POEA-related proposition for which the assessment cites the article. The retraction notice states that the article's conclusions about glyphosate carcinogenicity relied on unpublished Monsanto studies; omitted other available long-term cancer and toxicity studies; and included contributions from Monsanto employees who were not identified as authors. It further states that the authors may have received undisclosed financial compensation from Monsanto.

Lisa Herron confirmed in writing on July 10, 2026, that the risk assessment was not updated after the retraction. In the same email, Herron stated that the assessment "drew from a wide range of peer-reviewed research and EPA-reviewed information that remains valid" and that the retraction "didn't change the broader scientific understanding or the regulatory standards we follow, so the assessment didn't need to be revised." [Stantec, March 2026, p. 8; retraction notice; Herron email, July 10, 2026.]

The Forest Service stated that it "did not identify a realistic way for herbicide to reach areas used by Lahontan cutthroat trout" and therefore did not add a chemical-monitoring requirement. The authorization does not require pre-application baseline sampling or post-treatment downstream monitoring that could establish whether treatment-related residues reached receiving waters or whether later conditions differed from pre-treatment conditions. On downstream effects, the agency stated that it "did not identify a need for additional downstream analysis" given the small treatment areas, distance from water, and existing safeguards. [Herron email, July 10, 2026.]

Portions of the Caldor burn scar drain into Lake Tahoe via the Upper Truckee River and Trout Creek; from there, the Truckee River carries water from the lake through Reno to Pyramid Lake, the terminus of the watershed and the home of the Pyramid Lake Paiute Tribe. The Tribe holds Truckee River water rights that include federally reserved rights under the Winters doctrine and rights established and administered under the river's governing decrees and agreements. The cui-ui and Lahontan cutthroat trout, culturally and spiritually important to Tribe members, depend on habitat and water-quality conditions in the Pyramid Lake–Truckee River system, which receives Lake Tahoe outflow. [U.S. Fish and Wildlife Service, "Numana Dam Fish Passage Project," Sept. 19, 2023.]

Lahontan cutthroat trout were extirpated from Lake Tahoe and are the subject of an active multiagency and tribal reintroduction effort. In June 2022, the U.S. Fish and Wildlife Service began stocking 100,000 fish into the lake, with releases continuing through the summer. In 2024, researchers documented Lahontan cutthroat trout exhibiting spawning behavior in Third Creek—described as the first unassisted spawning attempt in Lake Tahoe in nearly 90 years. [U.S. Fish and Wildlife Service, "Lake Tahoe to Receive 100,000 Lahontan Cutthroat Trout This Summer," June 3, 2022; Carson Now, Oct. 29, 2024.]

In 2022, the U.S. Fish and Wildlife Service awarded the Pyramid Lake Paiute Tribe $8,292,215 in Bipartisan Infrastructure Law funding for the Numana Dam Fish Passage Project. The Tribe and FWS broke ground on September 13, 2023, on a project intended to open 65 additional miles of Truckee River habitat for cui-ui and Lahontan cutthroat trout. [U.S. Fish and Wildlife Service, "Numana Dam Fish Passage Project," Sept. 19, 2023; U.S. Fish and Wildlife Service, "Numana Dam Fish Passage Project" project page.]

Herron confirmed in writing on July 10, 2026, that no downstream analysis of potential herbicide effects on Pyramid Lake waters was conducted and that the Pyramid Lake Paiute Tribe was not consulted. The records reviewed for this comment do not identify what information, if any, the agency considered about downstream tribal waters or fishery resources when reaching its no-pathway determination. [Herron email, July 10, 2026.]

The problem is not that the lake cannot dilute what enters it. The problem is that dilution cannot replace a baseline. Without a documented pre-treatment baseline, there is no project-specific reference condition against which post-treatment measurements can be compared to assess whether conditions in receiving waters changed after treatment. The Forest Service's Decision Notice authorizes treatment over a 10- to 15-year period on up to 3,600 acres. [Decision Notice, p. 1.]

Glyphosate and aminomethylphosphonic acid (AMPA), its primary breakdown product, strongly adsorb to soil particles, though residues can move with eroded soil or sediment in runoff. USGS reports that AMPA has, on average, a longer half-life in soil than glyphosate. [U.S. Geological Survey, Occurrence, Fate, and Transport of Aerially Applied Herbicides, Scientific Investigations Report 2021–5039, 2021.] The authorization remains in effect for future treatment seasons. A pre-treatment baseline must be collected before the first application; once treatment begins, that opportunity is lost. That baseline would provide the clearest project-specific record of preexisting conditions and would strengthen the ability to distinguish any later treatment-related change from background conditions in these watersheds.

TRPA's 2023 Threshold Evaluation does not include glyphosate or AMPA among its 41 water-quality threshold parameters. No glyphosate- or AMPA-specific standard, monitoring requirement, or threshold-based response trigger currently applies under TRPA's framework.

As of August 25, 2026, SB 1370 remains pending after being ordered to third reading on August 13. AB 2410 was held under submission in the Appropriations Committee on August 13 and has not advanced. This comment does not rely on either bill as a basis for TRPA action; it asks TRPA to address the monitoring, mapping, notice, and disclosure gaps identified in the existing Caldor authorization and the record before this committee. [SB 1370 legislative history; AB 2410 legislative history.]

The Tahoe Regional Planning Compact gives TRPA authority to adopt environmental thresholds and enforce its own ordinances. TRPA does not permit this Forest Service project, but it can identify the monitoring and disclosure necessary to protect basin thresholds, place those requirements in the public record, and seek written commitments from the Forest Service and responsible state agencies.

I am asking this committee to direct TRPA staff to take the following actions, grouped by function:

Monitoring — Direct staff to formally request baseline water-quality testing for glyphosate and AMPA in receiving waters and tributaries associated with LTBMU treatment areas in the Saxon Creek, Trout Creek, and Upper Truckee River watersheds before any application begins.

Direct staff to obtain, publish, and evaluate the sampling plan that the Sierra Sun reported on May 28, 2026, was being developed in coordination with the

Lahontan Regional Water Quality Control Board and the Nevada Division of Environmental Protection. The plan should identify sampling locations, timing, analytical methods, reporting limits, upstream and downstream comparison sites, glyphosate and AMPA analytes, and public reporting deadlines. [Sierra Sun, "Glyphosate, Regional Plan Development Tracking and Transportation Projects: TRPA Governing Board Updates," May 28, 2026.]

Direct staff to request a site-specific treatment map and watershed analysis for the Plummer Ridge and Leoni Caldor Road areas. If that analysis identifies any area draining toward Lake Tahoe, request compound-specific baseline and post-treatment testing at appropriate upstream and downstream locations.

Initiate a staff and scientific review of whether glyphosate and AMPA should be added to TRPA's water-quality threshold parameters or otherwise incorporated into the basin's monitoring and response framework.

Accountability — Formally request that the Forest Service update its Human Health Risk Assessment to evaluate and explain whether, and if so how, the November 2025 retraction of Williams et al. (2000) affects its POEA analysis before any further herbicide application under the authorization proceeds.

Direct TRPA staff to formally request that the Forest Service identify what alternatives to herbicide use were evaluated for Tahoe Basin treatment areas, including mechanical removal and other non-chemical methods, and explain on what basis those alternatives were determined to be inadequate or infeasible.

Seek written Forest Service commitments to advance public notice at trailheads and principal access points serving treatment areas before any application, with direct notice to NTPUD, South Tahoe Public Utility District (STPUD), Incline Village General Improvement District (IVGID), and other affected water purveyors.

Direct TRPA staff to formally request a written downstream analysis of potential effects on the Pyramid Lake Paiute Tribe's fishery and waters supporting interests protected by the Tribe's reserved water rights. The Forest Service confirmed in writing that no such analysis was conducted and that the Tribe was not consulted. [Herron email, July 10, 2026.]

Authority — Direct staff to seek, before any LTBMU herbicide application, a written interagency agreement or written Forest Service commitments addressing baseline monitoring, downstream analysis, advance public notification, public reporting, and species protections.

Direct TRPA staff to formally notify the Pyramid Lake Paiute Tribe of this proceeding and request that the Forest Service initiate government-to-government consultation before any further herbicide application proceeds.

Procedural record request — I ask that my May 27 public comment and its supporting documents be entered in full into the record for this proceeding. I submitted the comment at 9:08 a.m. on May 27 as a general public comment, before the advance-submission deadline for the May 28 session. The herbicide authorization was not an agenda item at the May 27–28 meeting; I submitted it to establish the findings in the public record. The comment does not appear in the posted meeting materials for either day. I received no notice that the submission had failed to transmit. I followed up on June 1, June 5, and June 10, including a June 10 email copying Executive Director Julie Regan and asking why the comment had not been included. I received no response.

The time to put protections in place is before treatment begins. The window for baseline monitoring is still open, but it will narrow as winter conditions limit access and sampling.

Sources available upon request.

Katherine Levy
Tahoe Vista, California
katherinelevymv@gmail.com
415-515-2566

From: Jonathan Aylward <jonathan.aylward@gmail.com>
Sent: 8/25/2026 11:29:34 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public Comment for TRPA Governing Board Meeting — August 26, 2026 — Agenda Item 5.A

To the TRPA Governing Board,

I am writing to urge the TRPA to update its Code of Ordinances to ban synthetic herbicides, including glyphosate, throughout the Lake Tahoe Basin.

Relying on chemical sprays is a short-sighted financial shortcut that sacrifices long-term ecological health for operational convenience. The Lake Tahoe Basin is an exceptionally fragile alpine ecosystem and a premier recreation destination; it is no place for mass chemical applications that risk our watersheds, soil microbiomes, and local wildlife.

Instead of cutting corners with synthetic sprays, resources should be allocated toward labor-intensive, mechanical, and hand-crew management strategies that actually protect the landscape rather than dousing it in chemicals.

Please take decisive action to keep synthetic herbicides out of the Basin.

Sincerely,

Jonathan Aylward

Soda Springs, CA

--
-Jonny

From: Jenna Carando <jcarando@gmail.com>
Sent: 8/25/2026 1:11:52 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public comment - Prohibit glyphosate herbicide spraying Lake Tahoe Basin

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To the TRPA Board of Governors,

My name is Jenna and I'm writing as a full time resident who cares deeply about the Lake Tahoe Basin. **I'm urging the Board to amend the Code of Ordinances to prohibit conventional herbicide spraying, including glyphosate, in the Tahoe Basin.**

The U.S. Forest Service has authorized glyphosate spraying across 2,400–3,600 acres of the Caldor Fire scar, part of an 11,700-acre restoration project with an authorization that runs for 10–15 years. This decision was made through an Emergency Action Determination that bypassed the standard public objection process.

Glyphosate was classified by the WHO's International Agency for Research on Cancer as "probably carcinogenic to humans" in 2015, and California lists it under Proposition 65 as a known carcinogen. The 2000 Williams study long cited to support its safety was retracted in December 2025 after it was revealed to have been ghostwritten by Monsanto employees, and the 9th Circuit Court vacated the EPA's "not likely carcinogenic" determination in 2022.

Tahoe's watershed is uniquely vulnerable. This is a steep alpine basin with thin granitic soils feeding directly into the clearest lake in North America — a clarity that has already declined from 102 feet to 72 feet since 1968. Glyphosate has been detected in the majority of U.S. streams tested by USGS, and it persists in water for months. Spraying it uphill from Heavenly, Sierra-at-Tahoe, and Meyers puts drinking water, endangered species like Lahontan cutthroat trout, and the soil microbiome that burned forests need to recover directly at risk.

There are proven alternatives that don't require poisoning the ecosystem we're trying to heal: manual and mechanical thinning, prescribed herbivory (goat/sheep grazing), mulching, and native seeding.

I'm asking TRPA to use its authority to prohibit herbicide spraying in the Basin and require restoration projects to rely on non-chemical methods instead. Please record my strong opposition in the official record.

Thank you for your time and for protecting the lake we all love.

Jenna Carando

Truckee, CA

From: Al Miller <syngineer1@gmail.com>
Sent: 8/25/2026 2:56:46 PM
To: Public Comment <PublicComment@trpa.gov>; Graham St.Michel <gstmichel@trpa.gov>; Julie Regan <jregan@trpa.gov>; Hayley Williamson <hayley.a.williamson@gmail.com>
Subject: Opposing Plans for Herbicide (Glyphosate) Use In the Caldor Fire Burned Area; agenda item 5.A., TRPA EIP Comm. meeting of August 26, 2026
Attachments: Comments on Glyphosate Project - EIP Comm item 5.A.,mtg 8-26-26.pdf

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Please see the attached comments for the record in item re Plans for Herbicide (Glyphosate) Use In the Caldor Fire Burned Area; agenda item 5.A., TRPA Environmental Improvement Committee meeting of August 26, 2026.

Thank you, Alan Miller, Professional Engineer

General Public Interest Comments USFS-LTBMU Plans for Herbicide (Glyphosate) Use In the Caldor Fire Burned Area; agenda item 5.A., TRPA Environmental Improvement Committee meeting of August 26, 2026

To publiccomment@trpa.gov

August 25, 2026

Comments Opposing Use of Glyphosate Under the TRPA Memorandum of Understanding with US Forest Service-Lake Tahoe Basin

Interested persons and EIP Committee members,

I am a civil and environmental engineer with a background water quality regulations. These comments follow my May 2026letter and testimony to TRPA's Governing Board in this matter. I will be brief, and assert my contentions are fully backed up in the law and the public record.

1. The Compact gives TRPA the authority and duty to issue a permit to the USFS or any other person for any activity that may affect the natural resources of the Tahoe region, unless that activity is designated as exempt from a TRPA permit. The duty to issue a permit is after a public meeting and a vote of at least Governing Board members in the CA delegation and nine votes overall of the 14 potential votes.

2. The Compact grants the authority for TRPA to enter into lawful agreements with other public agencies has executed a Memorandum of Understanding (MOU) with US Forest Service-Lake Tahoe Basin Management Unit as cited in and linked to today's item 5.A. The MOU does not cover the use of glyphosate as proposed by US Forest Service-Lake Tahoe Basin for the Caldor Fire recovery activities in accordance with provisions for "EXEMPT ACTIVITIES" in MOU section III.F. "Vegetation Management"; the activities are designated as subject to application review in section IV. "PROJECTS TO BE REVIEWED BY THE GOVERNING BOARD."

3. The MOU specifies that where activities that may affect the natural resources of the region are neither exempt or covered by the MOU, or at the discretion of TRPA, the Governing Board shall require an application for review and make required findings at a public meeting to support or deny permit issuance.

4. The US Forest Service-Lake Tahoe Basin has not provided an application to TRPA for review of the proposed activities with glyphosate nor has TRPA required an application as is its legal duty for the proposed activities. Therefore I request that TRPA implement the binding provisions of the MOU and require an application for review and permit consideration, with public participation as required. In the alternative, the TRPA and US Forest Service-Lake Tahoe Basin may propose changes to the MOU for review and consideration by the Governing Board, with public participation as required and the "5 and 9" voting procedure described above for any changes.

I looked on TRPA's website for evidence that the MOU was approved by the Governing Board and did not locate any relevant information *other than* the MOU, which does not disclose the approval process. The Governing Board has delegated authority to the Executive Director to act on its behalf in executing the MOU. If a letter requirement to the USFS-Lake Tahoe Basin is not timely forthcoming in this matter requiring an application for review, I intend to request any available public documents under the California Public Records Act and/or federal Freedom of Information Act relating to use of glyphosate or other herbicides by the USFS-Lake Tahoe Basin. I do not believe the required findings to support the proposed use as required by the Compact and TRPA Code of Ordinances exist in the public record and a public records request in the public interest could likely confirm that.

In closing, I urge TRPA to fulfill its duties and requirements under the Compact and Code of Ordinances unless the USFS-Lake Tahoe Basin cancels its proposed use of glyphosate in the Caldor Fire area. Persons aggrieved by a failure of the TRPA to abide by the provisions of the Compact and/or MOU may initiate litigation against TRPA under the provisions of law outlined in the Compact and provisions stated above, or may litigate against the USFS-Lake Tahoe Basin for failing to obtain a permit as required for the proposed activities involving use of glyphosate, as necessary. These are basic administrative requirements that are not being fulfilled by TRPA based on the agenda item. Consult an attorney, as I am not providing any specific legal advice.

Alan Miller, Professional Engineer

From: Aaron <renotahoesky@gmail.com>
Sent: 8/25/2026 8:24:30 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: TRPA Env Improvement Com meeting 8-26-26

Public comment under general public comment item #2

On your agenda item 5.A is proposals of herbicide use in the Caldor fire. I am wholeheartedly against the use of roundup or related pesticides in restoration of the Caldor fire burn scar.
Monsanto, now owned by Bayer, has faced thousands of lawsuits alleging that Roundup caused cancer, particularly non-Hodgkin lymphoma. In the cases that actually went to trial, plaintiffs have won several major verdicts, including the first major case in 2018 involving Dewayne Johnson, plus later cases involving awards of hundreds of millions or even billions of dollars. As of 2026, there are 11 verdicts for plaintiffs against Bayer/Monsant.
It is incredibly difficult to impossible to link an environmental toxin to a disease and yet this has been done many times concerning glyphosate.
Lake Tahoe is the drinking source for millions of people per year. We should not be using something known to cause cancer near this source of water where once contaminated is impossible to reclamate.

I personally do not want anything to do with glyphosate and go out of my way to avoid it due to my own health research. There is a reason there is a growing organics movement worldwide and avoiding it has improved my own health! I don't want to have to start filtering my "Tahoe Tap" Even if the dilution factor is large, I find the intentional use of glyphosate in the basin very concerning given what we know.

The proponents of glyphosate talk about it not impacting human health but ignorantly ignore the microbiome. The human's can live without their microbiome and pesticides alter and disrupt this microbiome.

I support natural succession with some seeding over the use of pesticides.

Aaron Vanderpool

From: Abby Lichtman <abby@abbylichtman.com>
Sent: 8/25/2026 9:55:05 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: Stop The Spray
Attachments: PastedGraphic-1.tiff

Hi,

I am a local that loves to hike, ski and play in the outdoors. I garden and farm in the area.

Glyphosate has been PROVEN to cause cancer and disrupt the endocrine system. I want to be able to hike/swim/eat from/on the land - when I filed a complaint with the CA EPA, they dismissed my complaint saying 'it's only toxic if you touch it'. Well - when it's dry, the dust blows around and you breathe it, when it rains, it goes into our waterways. It will be in our air, in our soil, our local food system, on our babies and animals when we play outside.

Childhood cancer and infertility are skyrocketing. We need to protect ourselves, our kids, our pets and our wildlife from this KNOWN toxin.

TRPA has been complicit with allowing this, as has our governor. We need other fire mitigation methods like supervised burns, fire barriers etc to aid in fire prevention. THIS IS NOT OKAY!!!!!!!!!!!!!!!!!!!!!!!!

I am begging you to help stop this and save future lives and suffering. Spraying this WILL cause untold harm, ruin people's lives, and destroy our community.

The breastmilk of Intuit women who have never touched plastic in their lives tested positive for microplastics - this WILL get into our bloodstreams - please help us keep one more toxin out.

Abby

Abby Lichtman, Owner
Abby Lichtman Design
www.abbylichtman.com
@abbylichtmandesign

ABBY LICHTMAN DESIGN
WWW.ABBYLICHTMAN.COM
ABBYLICHTMANDESIGN

From: Bennett <bennett1280@gmail.com>
Sent: 8/25/2026 8:21:29 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: RE: Comment in Opposition to Proposed Herbicide Use in the Caldor Fire Burn Scar

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To the Tahoe Regional Planning Agency (TRPA) Environmental Improvement Committee,

I am writing to oppose the proposed use of herbicides in the Caldor Fire burn scar. While I understand the desire to manage post-fire vegetation and prevent erosion or invasive species, herbicide application in a sensitive post-fire landscape carries significant ecological, public health, and water-quality risks that are not justified by the information currently available.

Please do not approve any herbicide plan for the Caldor burn scar unless TRPA provides, in advance of any vote, a complete and specific public record addressing at minimum the following:

1. **Clear purpose and necessity**
    - What problem herbicide use is intended to solve (erosion control, invasive suppression, fuel reduction, etc.) and why non-chemical alternatives are insufficient.
    - Why herbicides are the least-toxic, most effective option compared with targeted mechanical treatment, reseeding with appropriate native species, mulching, erosion control blankets, or other site-specific measures.
2. **Active ingredients and application details**
    - Exact **chemical(s)**, concentration, surfactants/adjuvants, and formulation type.
    - Application method (e.g., foliar spray, wick application, cut-stump, granular), timing (season/month), and frequency.
    - Treatment area boundaries, buffer distances, and how drift/runoff are prevented—especially in areas near waterways, wetlands, springs, and steep slopes.
3. **Water-quality and Tahoe Basin protections**
    - A detailed analysis of potential impacts to streams, tributaries, groundwater, and downstream receiving waters.
    - How the proposal complies with TRPA/Regional water quality requirements and the Tahoe Basin's unique sensitivity.
    - Monitoring plans for nutrients, vegetation response, and potential contamination.
4. **Ecological and wildlife impacts**
    - How application will protect aquatic habitat, pollinators, threatened or sensitive species, and soil biology.
    - Any expected short- and long-term impacts on native plant regeneration and forest recovery.
5. **Alternatives analysis and adaptive management**
    - A comparison of herbicide use against non-chemical or lower-risk strategies with a clear justification.
    - A commitment to adaptive management based on monitoring results, including a stop-work trigger if impacts exceed predicted outcomes.

Given the scale and visibility of post-fire restoration in the Tahoe region, I urge TRPA to apply the precautionary approach: **avoid herbicides in burned areas unless there is compelling, evidence-based necessity and a comprehensive risk-reduction plan**. If the objective is invasive species control or vegetation management, TRPA should prioritize methods that protect water quality and support native recovery.

I request that the Environmental Improvement Committee:

- **Reject** the proposed herbicide authorization at this time, and/or
- **Defer** any action until TRPA provides the full documentation above for public review, including maps, chemical/product specifics, risk assessments, and a robust alternatives/monitoring plan.

Thank you for considering my comments. Please include this letter in the public record for the committee's deliberations.

Sincerely

Mary Bennett

1280 Mineral Springs Trail, Alpine Meadows, CA. 96146

PO Box 3757 Olympic Valley, CA. 96146

Mary Bennett

PO Box 3757| Olympic Valley, CA 96146
T: 530-583-9363
E-mail: bennett1280@gmail.com

From: Evan Raskin <raskin@earthday.org>
Sent: 8/25/2026 8:53:01 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public Comment Urging TRPA to Amend the Code of Ordinances to Prohibit Conventional Herbicide Spraying in the Lake Tahoe Basin (August 26, 2026 Governing Board Meeting)
Attachments: blueonwhitebackgroundwithtagline(1)_13625d09-5489-42ed-b6ac-1cdd424d3a59.png , SocialLink_Facebook_32x32_7e81281d-adc3-463a-acbc-a74b7cb3819f.png , SocialLink_Twitter_32x32_65fbbe82-7bf8-4627-b09e-cb3d5f136be3.png , SocialLink_Instagram_32x32_426957fe-4769-46c9-81aa-e1881f86dd00.png , SocialLink_Linkedin_32x32_dd06fa3a-e76e-4b8d-973c-cf6c4d6cd8b9.png , 4star120x60_5fed096d-e2dd-4be8-8370-eab5a497429a.gif , EARTHDAY.ORG Written Public Comment.pdf

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Dear Members of the Environmental Improvement Program Committee of the TRPA Governing Board,

On behalf of EARTHDAY.ORG, we write to urge the Tahoe Regional Planning Agency (TRPA) to amend its Code of Ordinances to prohibit the aerial and ground application of conventional, synthetic herbicides, especially those including glyphosate, anywhere within the Lake Tahoe Basin. We submit this comment in advance of the August 26 Governing Board meeting and ask that it be entered into the official record.

EARTHDAY.ORG has spent more than five decades building the movement that grew out of the first Earth Day in 1970, and we know Lake Tahoe as one of the irreplaceable landscapes that the movement exists to protect. The clarity of this lake, the health of its watershed, and the resilience of the forests that ring it are not amenities — they are the ecological inheritance of everyone who lives in, works in, or simply loves the Sierra Nevada. That inheritance is now on the table.

We Share the Goal of Restoring the Caldor Fire Landscape — But Herbicides Are the Wrong Tool

We recognize, and do not dismiss, the real challenges facing post-fire recovery in the Caldor Fire burn scar. Restoring this landscape matters, and EARTHDAY.ORG supports that goal. We do not, however, support the conclusion that spreading a synthetic herbicide across thousands of acres of this watershed is the way to solve these challenges.

The premise that herbicide treatment meaningfully reduces wildfire risk is far less settled than the Forest Service's Environmental Assessment suggests. In its most recent update to its report on hazardous fuels and wildfire mitigation, released earlier this year, the Congressional Research Service cautioned that herbicides leave dead fuels on the surface that still need to be physically removed to reduce overall fuel loading1. In other words, spraying vegetation converts living, moisture-holding plants into dead, dry fuels which remain in the landscape until they decompose, are mechanically removed, or are burned. Herbicide use is directly contrary to the Project's stated goal to improve resiliency to future wildfire impacts.

This finding is supported by research from the authorities responsible for stewarding the Lake Tahoe Basin. Forest Service-affiliated studies on herbicide-treated shrub fields in the very same fire-scarred landscapes of the Sierra Nevada that this project is modeled on have reached a similar conclusion: converting live vegetation to dead vegetation through herbicide application shifts the fuel matrix in ways that can leave a treated stand drier and more combustible2. A restoration strategy that trades a live-fuel problem for a dead-fuel problem, in a Basin already primed for catastrophic fire, is not a strategy TRPA should endorse or permit.

Herbicide Application Threatens the Water That Defines This Basin

Lake Tahoe's defining feature is its water clarity, and TRPA has long recognized herbicide runoff as a threat to it3, with TRPA's existing Code of Ordinances stating that "No detectable concentration of any [herbicide] shall be allowed to enter any stream environment zone, surface water, or ground water.4" Glyphosate does not stay where it is applied. Nationwide monitoring by the U.S. Geological Survey has detected glyphosate contamination in 94.3% of streams and rivers5. In a steep, granitic, snowmelt-driven watershed like Tahoe's, chemicals applied to burned hillsides are positioned to move downslope into tributaries that feed directly into the lake. A substance the World Health Organization's International Agency for Research on Cancer has classified as probably carcinogenicto humans6 has no place being applied uphill of a drinking water source and a lake. This basin has spent decades trying to keep blue.

Herbicide Application Undermines the Forest's Own Capacity to Recover

The stated purpose of this project is to help the forest heal. Yet the same broad-spectrum herbicides proposed for this project are toxic to the soil microbes and mycorrhizal fungi that tree seedlings depend on to establish root systems and take up nutrients; glyphosate destroys the crucial soil microbiome that makes forest regeneration possible in the first place7. The Environmental Protection Agency's own draft biological evaluation acknowledges that glyphosate use is likely to adversely affect roughly 93 percent of the endangered species and 96 percent of the critical habitats it analyzed8, and independent research has documented harm to amphibians and aquatic invertebrates at concentrations well below typical application rates9. Tahoe's watershed already supports stressed and sensitive species in the wake of the Caldor Fire; it should not also absorb a broad-spectrum toxicant.

Proven, Non-Chemical Alternatives Exist

TRPA does not have to choose between a recovering forest and a chemically treated one. Land managers across the West already use non-toxic methods to control competing vegetation and reduce fuels after fire, including:

- Manual and mechanical thinning of competing brush, which creates local jobs and leaves mulch that retains soil moisture instead of drying it out while also preserving a healthy soil microbiome;
- Carefully planned prescribed burns, a widely recognized forest management tactic which mimics the low-intensity fire this landscape evolved with, to safely remove fuel sources while recycling nutrients back into the soil instead of introducing a synthetic toxicant.
- Mulching and wood chipping of dead and down material on-site, which suppresses weed regrowth, reduces erosion into the watershed, and speeds nutrient cycling; and
- Dense native seeding and biocontrol to help desired species outcompete invasives without altering the soil chemistry or watershed.

These approaches directly address the regeneration and fuel-accumulation challenges the Forest Service has identified without introducing a probable human carcinogen into an alpine watershed.

Our Request

EARTHDAY.ORG respectfully requests that the Governing Board amend the TRPA Code of Ordinances to prohibit the application of conventional, synthetic herbicides — including but not limited to glyphosate-based formulations — within the Lake Tahoe Basin, and to require that any vegetation management or post-fire restoration project within TRPA's jurisdiction rely on manual, mechanical, biological, or other non-chemical methods. TRPA has authority over land use and environmental standards within the Basin, and this Board can set a Basin-wide standard that keeps synthetic herbicides out of this naturally and culturally significant watershed.

We urge the Governing Board to support the healthy recovery of the Caldor Fire burn scar and protect the Lake Tahoe Basin in perpetuity by amending its Code of Ordinances to prohibit the use of conventional herbicides in the Basin.

Thank you for your consideration and for your continued stewardship of this irreplaceable landscape.

Respectfully submitted,

Evan Raskin, National Campaign Manager, EARTHDAY.ORG

References

1. Congressional Research Service, Hazardous Fuels and Wildfire Mitigation: Background and Congressional Considerations, R48779 (2026), https://www.congress.gov/crs-product/R48779.

2. McGinnis, T.W., et al., "Fuel buildup and potential fire behavior after stand-replacing fires, logging fire-killed trees and herbicide shrub removal in Sierra Nevada forests," Forest Ecology and Management 260 (2010): 22–35.

3. Tahoe Regional Planning Agency, threshold monitoring reports on Lake Tahoe clarity, https://www.trpa.gov/.

4. Tahoe Regional Planning Agency Code of Ordinances Section 60.1.7 https://www.trpa.gov/wp-content/uploads/TRPA-Code-of-Ordinances.pdf

5. U.S. Geological Survey, "Influence of Land Use and Region on Glyphosate and Aminomethylphosphonic Acid in Streams in the United States," https://www.usgs.gov/.

6. International Agency for Research on Cancer (World Health Organization), IARC Monograph on Glyphosate, Volume 112 (2015).

7. Van Bruggen, A.H.C., et al., "Indirect Effects of the Herbicide Glyphosate on Plant, Animal and Human Health Through Its Effects on Microbial Communities," Frontiers in Environmental Science (2021).

8. U.S. Environmental Protection Agency, Draft Biological Evaluation for Glyphosate (November 2020), https://www.epa.gov/endangered-species/draft-national-level-listed-species-biological-evaluation-glyphosate.

9. See, e.g., studies collected in Environmental Toxicology and Chemistry on the toxicity of glyphosate-based formulations to North American amphibian species.

Evan Raskin
National Campaign Manager

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Public Comment Urging TRPA to Amend the Code of Ordinances to Prohibit Conventional Herbicide Spraying in the Lake Tahoe Basin (August 26, 2026 Governing Board Meeting)

Dear Members of the Environmental Improvement Program Committee of the TRPA Governing Board,

On behalf of EARTHDAY.ORG, we write to urge the Tahoe Regional Planning Agency (TRPA) to amend its Code of Ordinances to prohibit the aerial and ground application of conventional, synthetic herbicides, especially those including glyphosate, anywhere within the Lake Tahoe Basin. We submit this comment in advance of the August 26 Governing Board meeting and ask that it be entered into the official record.

EARTHDAY.ORG has spent more than five decades building the movement that grew out of the first Earth Day in 1970, and we know Lake Tahoe as one of the irreplaceable landscapes that the movement exists to protect. The clarity of this lake, the health of its watershed, and the resilience of the forests that ring it are not amenities — they are the ecological inheritance of everyone who lives in, works in, or simply loves the Sierra Nevada. That inheritance is now on the table.

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The premise that herbicide treatment meaningfully reduces wildfire risk is far less settled than the Forest Service's Environmental Assessment suggests. In its most recent update to its report on hazardous fuels and wildfire mitigation, released earlier this year, the Congressional Research Service cautioned that herbicides leave dead fuels on the surface that still need to be physically removed to reduce overall fuel loading[1]. In other words, spraying vegetation converts living, moisture-holding plants into dead, dry fuels which remain in the landscape until they decompose, are mechanically removed, or are burned. Herbicide use is directly contrary to the Project’s stated goal to improve resiliency to future wildfire impacts.

This finding is supported by research from the authorities responsible for stewarding the Lake Tahoe Basin. Forest Service-affiliated studies on herbicide-treated shrub fields in the very same fire-scarred landscapes of the Sierra Nevada that this project is modeled on have reached a similar conclusion: converting live vegetation to dead vegetation through herbicide application shifts the fuel matrix in ways that can leave a treated stand drier and more combustible[2]. A restoration strategy that trades a live-fuel problem for a dead-fuel problem, in a Basin already primed for catastrophic fire, is not a strategy TRPA should endorse or permit.

Herbicide Application Threatens the Water That Defines This Basin

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Proven, Non-Chemical Alternatives Exist

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- Carefully planned prescribed burns, a widely recognized forest management tactic which mimics the low-intensity fire this landscape evolved with, to safely remove fuel sources while recycling nutrients back into the soil instead of introducing a synthetic toxicant.
- Mulching and wood chipping of dead and down material on-site, which suppresses weed regrowth, reduces erosion into the watershed, and speeds nutrient cycling; and
- Dense native seeding and biocontrol to help desired species outcompete invasives without altering the soil chemistry or watershed.

These approaches directly address the regeneration and fuel-accumulation challenges the Forest Service has identified without introducing a probable human carcinogen into an alpine watershed.

Our Request

EARTHDAY.ORG respectfully requests that the Governing Board amend the TRPA Code of Ordinances to prohibit the application of conventional, synthetic herbicides — including but not limited to glyphosate-based formulations — within the Lake Tahoe Basin, and to require that any vegetation management or post-fire restoration project within TRPA's jurisdiction rely on manual, mechanical, biological, or other non-chemical methods. TRPA has authority over land use and environmental standards within the Basin, and this Board can set a Basin-wide standard that keeps synthetic herbicides out of this naturally and culturally significant watershed.

We urge the Governing Board to support the healthy recovery of the Caldor Fire burn scar and protect the Lake Tahoe Basin in perpetuity by amending its Code of Ordinances to prohibit the use of conventional herbicides in the Basin.

Thank you for your consideration and for your continued stewardship of this irreplaceable landscape.

Respectfully submitted,

Evan Raskin, National Campaign Manager, EARTHDAY.ORG

EARTHDAY.ORG

References

1. Congressional Research Service, Hazardous Fuels and Wildfire Mitigation: Background and Congressional Considerations, R48779 (2026), https://www.congress.gov/crs-product/R48779.

2. McGinnis, T.W., et al., "Fuel buildup and potential fire behavior after stand-replacing fires, logging fire-killed trees and herbicide shrub removal in Sierra Nevada forests," Forest Ecology and Management 260 (2010): 22–35.

3. Tahoe Regional Planning Agency, threshold monitoring reports on Lake Tahoe clarity, https://www.trpa.gov/.

4. Tahoe Regional Planning Agency Code of Ordinances Section 60.1.7 https://www.trpa.gov/wp-content/uploads/TRPA-Code-of-Ordinances.pdf

5. U.S. Geological Survey, "Influence of Land Use and Region on Glyphosate and Aminomethylphosphonic Acid in Streams in the United States," https://www.usgs.gov/.

6. International Agency for Research on Cancer (World Health Organization), IARC Monograph on Glyphosate, Volume 112 (2015).

7. Van Bruggen, A.H.C., et al., "Indirect Effects of the Herbicide Glyphosate on Plant, Animal and Human Health Through Its Effects on Microbial Communities," Frontiers in Environmental Science (2021).

8. U.S. Environmental Protection Agency, Draft Biological Evaluation for Glyphosate (November 2020), https://www.epa.gov/endangered-species/draft-national-level-listed-species-biological-evaluation-glyphosate.

9. See, e.g., studies collected in Environmental Toxicology and Chemistry on the toxicity of glyphosate-based formulations to North American amphibian species.

Submitted via email to <publiccomment@trpa.gov>

From: Cheryl Busby <cbusbymsw@yahoo.com>
Sent: 8/25/2026 9:52:12 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public comment - Prohibit glyphosate herbicide spraying Lake Tahoe Basin

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Please enroll the service of CCC and other agencies such as Growlersberg, etc. Please do not use poison.
Sent from my iPhone

From: Renna Hickey <renna@envirovoters.org>
Sent: 8/25/2026 9:34:42 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: General Comment - Item A Herbicide Usage 8/26/2026
Attachments: image001.png , image002.png , image003.png , PC on herbicide to Tahoe Regional Planning Agency.docx

---

Hello TRPA,
Thank you for collecting comments on the herbicide use on the Caldor Fire scar. Please see comment/letter attached for your public comment.
Best,

Renna Hickey (she/her)
Regional Organizer, Sierra Nevada
California Environmental Voters &
California Environmental Voters Education Fund
✉ renna@envirovoters.org | 559-281-3082

Confidentiality Notice: This message and any attachments are confidential and intended only for the intended recipient(s). If you received this in error, please notify the sender immediately and delete the message. Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. Thank you.

Tahoe Regional Planning Agency
128 Market St.
Stateline, NV

Dear TRPA,

As the Sierra Organizer at California Environmental Voters, we echo the community outcry against herbicide use and its impact on protected natural lands. **Although the Caldor Fire Restoration Project has meaningful intentions, we oppose the inclusion of targeted herbicide use.**

The Caldor Fire was devastating to witness, especially due to personally knowing families in Meyers and South Lake Tahoe that were evacuated. The drive up Route 50 is an ecological scar reminding us of the lasting damage and cost to our community due to neglecting the ongoing climate crisis. The project to combat overgrowth can be more intentional with science-based and more natural solutions. The use of Glyphosate continues to try and solve a problem without the appropriate tools for the moment we are in; and only stands to further damage our wild spaces and jeopardize the ecological and public health of our small community. Glyphosate doesn't stay where you spray it, especially in natural downstream alpine watersheds that collect snowmelt, which contradicts the effectiveness of the proposed "100-foot buffer of any stream channel". The product has also been linked to non-Hodgkin lymphoma by the World Health Organization, one of the most common cancers in the nation, and will risk thousands of nearby residents, tourists, and recreationalists that are promised clean alpine water.

The moment we are in right now requires working with rural and local communities to provide jobs as we build resilience in the Sierra in sustainable ways that will keep us all safe from wildfires and toxins. We urge TRPA to prioritize science-based solutions over chemical contamination, including targeted grazing, manual thinning, native seeding, and mulching to support natural recovery and wildfire prevention. **Please consider this letter as opposition to allowing herbicide, such as glyphosate, to be sprayed in our beloved forest, near our pristine waters, and our community's resourceful areas. Thank you for time and consideration on this matter.**

Sincerely,

Renna Hickey
Sierra Organizer
California Environmental Voters

CALIFORNIA
ENVIRONMENTAL
VOTERS
EDUCATION FUND

From: Lauren Lindley <lauren@laurenlindley.com>
Sent: 8/24/2026 6:22:03 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Written Public Comment for the August 26, 2026 Environmental Improvement Committee: Caldor Fire Restoration Project Herbicide Use

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Dear Chair and Members of the Committee,

I am a resident of South Lake Tahoe, and I recreate routinely in the Caldor burn. I have watched this ground come back over the past several years, and I know these units well enough to have opinions about which of them a hand crew could reasonably work. I am writing about the proposed herbicide use in the Caldor Fire Restoration Project.

I want to be clear about where I stand, because I think it differs from much of what you are hearing. I am not asking you to oppose all herbicide use. I understand what happens when montane chaparral captures a burn scar and holds it for forty years. I understand that hand grubbing on steep, unstable post-fire slopes carries its own erosion cost, and that we are trying to get conifers established before this ground burns a second time. Limited, targeted application by trained Forest Service crews with backpack sprayers, in places where crews genuinely cannot work by hand, is a defensible tool.

What I am asking is that this stay small, and that the limits be written down and enforceable rather than described as current intentions. Contingencies drift toward defaults when the default is cheaper. That is the real risk here, and it is the one I would like this Committee to close off.

The drinking water standard is the wrong test. The Forest Service has said that if glyphosate reaches water, concentrations would remain below federal drinking water standards. For most watersheds, that would be a reasonable answer. For this one, it is not the question.

Lake Tahoe is designated an Outstanding National Resource Water under the Clean Water Act. That designation carries Tier 3 antidegradation protection, which requires that existing water quality be maintained and protected. It does not ask whether a pollutant stays under a threshold. It asks whether we are degrading the water at all. An assurance built around a maximum contaminant level does not answer a Tier 3 standard, and I would ask the Committee not to accept it as though it does.

This matters practically, not just legally. Post-fire soils go hydrophobic. Runoff after a high-severity burn does not behave the way it does under intact forest. A one hundred foot buffer measured from mapped water bodies says nothing about the ephemeral drainages and snowmelt channels that actually move water off that hillside in May.

What I am asking the Committee to recommend:

1. **No application in the Basin portion until the interagency review is complete and public.** Executive Director Regan requested a meeting with the Forest Service and the Lahontan Regional Water Quality Control Board before any implementation. That request should become a condition, and the outcome should be published, not summarized.
2. **A written Tier 3 antidegradation determination from Lahontan before any herbicide is applied in the Basin.** Lahontan, not the Forest Service, is the agency charged with protecting this designation. Ask them to put their analysis in writing and make it public. If the answer is that this use is consistent with Tier 3, we should all be able to read why.
3. **A hard acreage cap, annual and cumulative, expressed as a share of the Basin portion of the project.** Any proposal to exceed it returns to the Governing Board in a public hearing. Without a ceiling, "only where manual removal is infeasible" is a statement of intent, not a limit.
4. **A written, public, unit-by-unit infeasibility determination before any unit is authorized for treatment.** If hand crews cannot do the work, the record should say why, for that unit, before the spraying and not after.
5. **Backpack and spot application only, permanently, in writing.** Aerial and broadcast application should be prohibited in the Basin portion as a condition, not described as not currently planned.
6. **Buffers extended to ephemeral drainages, snowmelt channels, and springs,** not only to mapped water bodies, and widened on slopes above thirty percent.
7. **POEA-free formulations only.** The surfactants in a tank mix receive far less scrutiny than the active ingredient and are considerably more toxic to aquatic life. Approving glyphosate is not the same as approving every formulation of it.
8. **Fourteen days of advance public notice with unit maps and treatment dates,** in addition to on-site signage, and an annual public report to the Governing Board listing acres treated, product and volume applied, and monitoring results.
9. **A five year sunset on any herbicide authorization in the Basin,** renewable only after a public hearing.

I know TRPA has no permitting authority over a federal project, and I am not asking you to pretend otherwise. But this Committee's recommendation carries weight with the Forest Service, with Lahontan, and with the public, and TRPA's longstanding policy discouraging terrestrial herbicide use in the Basin means something. Whatever is approved here becomes the precedent for the next burn scar, and there will be a next one.

I would rather see this done carefully and narrowly than see it fought to a standstill and then done badly under pressure. Give the Forest Service a clear ceiling and a clear process, and hold them to it.

Thank you for your work and for taking public comment on this.

Sincerely,

Lauren Lindley
2477 Cattlemans Trail
South Lake Tahoe, CA 96150

Lauren Lindley

Website
IG: @laurenlindleyphoto
Linkedin: in/llindley/
512-573-8606

If you are a potential client looking for availability, pricing, and package information, filling out the contact form on my website is the fastest way to get that. If you request the appropriate service, all that information will auto-send because the internet is magic. When I return to my computer, I assure you that I will respond to everything in absolutely no specific order and will likely play favorites, per usual.

From: Reid Reichardt <reidtahoe@fastmail.net>
Sent: 8/24/2026 3:33:57 PM
To: Public Comment <PublicComment@trpa.gov>; Kat McIntyre <KMcIntyre@trpa.gov>; Julie Regan <jregan@trpa.gov>; Graham St.Michel <gstmichel@trpa.gov>
Cc: Doug Flaherty <tahoesierracleanair@gmail.com>; Tobi Tyler <tylertahoe1@gmail.com>; Ann Nichols <preserve@ntpac.org>; Brett Tibbitts <tahoeeastshorealliance@gmail.com>; Judith Tornese <friendsofthewestshore@gmail.com>;
Subject: Public Comment — August 26 TRPA EIP Committee, Agenda Item 5.A
Attachments: Reichardt-Comment-EIP-Item-5A-Aug26-2026.pdf

Chair Faustinos and Members of the Committee,

Attached is my written public comment for the August 26 Environmental Improvement Program Committee meeting, regarding Agenda Item 5.A, herbicide use associated with the Caldor Fire Restoration Project.

I'd appreciate its inclusion in the record for this item.

Thank you,
Reid Reichardt
South Lake Tahoe, CA
reidtahoe@fastmail.net

To: Environmental Improvement Program Committee, TRPA Governing Board
From: Reid Reichardt, South Lake Tahoe
Date: August 24, 2026
Re: Agenda Item 5.A, Herbicide Use Associated with the Caldor Fire Restoration Project

Thank you for placing this item on the agenda. I'm a Tahoe resident who has hiked the Caldor area since 2012 — nine years before the fire, and every year since. I'm extremely concerned about the impacts the Caldor Fire Restoration Project will have on Tahoe Basin forest health, as well as the long-term health of regular forest users and nearby communities.

This project was approved under an emergency action determination that eliminated the public's formal opportunity to object before implementation, and its Human Health Risk Assessment cites a safety review retracted in December 2025 as ghostwritten by Monsanto employees. The World Health Organization classifies glyphosate as a probable human carcinogen, and in 2021 the EPA found it likely to adversely affect over 90% of endangered species.

I've read the project's Environmental Assessment, Biological Assessment, and Human Health Risk Assessment, along with the MOU attached to the staff report.

I'm writing about four things: an observation, an unanswered question, an obligation that applies regardless of the answer, and a request.

1. My direct observation in the Caldor.

What I see on the ground in the Caldor area includes abundant natural conifer regeneration — seedlings and saplings one, two, and some even three feet tall. The EA models roughly 4,900 acres as unlikely to regenerate naturally, at under 40% probability. But that is modeling. What I'm seeing doesn't match that estimate, and I'd encourage the Committee to ask when those figures were last checked against conditions on the ground.

This abundant regeneration also raises a practical question. Where natural seedlings are already established among the shrubs targeted for herbicide, it isn't clear how they are protected during spraying, and who verifies it afterward. The chaparral itself is also doing real work — holding burned soil and preventing watershed erosion.

2. The staff report does not state whether this activity is exempt.

The report describes the MOU as identifying certain activities as exempt from TRPA review, and states that activities not exempt are reviewed under the Regional Plan and Code. But it does not say which category this project's herbicide application falls into.

TRPA's website lists this Forest Service MOU among its Exempt MOUs — under which certain agencies are given authority to review their own projects for conformance with TRPA standards. That makes the scope of each listed exemption consequential: where an activity falls outside what the MOU specifies, the self-review authority does not apply. So the question is whether herbicide application across thousands of acres falls within what this MOU specifies.

The MOU caps its exemptions carefully: erosion control and watershed restoration at fifty acres, heavy-equipment tree removal at 100 acres, excavation at 200 cubic yards. Section III.F.3 says nothing about herbicides. It exempts "reforestation or revegetation of land" with no limit — but interpreting that to cover chemical treatment across thousands of acres, when the document's other exemptions carry clear limits, should be examined closely rather than assumed.

Section V is also relevant. It requires the Forest Service to make protective findings before disturbing Stream Environment Zones under exemptions in Sections III B, G, H, I, and J. Section F is not among them. If the drafters had understood F.3 to encompass chemical application near sensitive lands, leaving it off that list would be difficult to explain.

Two more important points from the document itself. First, Section III.G.3, one subsection later, exempts "fuel management through prescribed burning, chipping, lop and scatter, and other techniques." When the drafters wanted an exemption to cover a range of methods, they enumerated them and added a catch-all. Section III.F.3 does neither — and shouldn't be treated as though it did. Silence is not permission for any method at all.

Second, as the staff report notes, the MOU exempts *specified* activities. The question is whether chemical application across thousands of acres is among those exempted activities. If it is, what would not be covered? Would 100,000 acres be exempt? The document sets no limit — and that, I would suggest, is because chemical treatment at this scale was never contemplated when the MOU was written. There are no herbicide provisions anywhere in it. And Section V's protections for Stream Environment Zones skip Section F entirely. So this reads much less like a deliberate exemption for mass herbicide application than like a gap that no one ever anticipated. Either way, this needs to be resolved now, before thousands of acres are sprayed.

I searched the full Code of Ordinances for provisions addressing herbicide use. Aside from a paragraph about toxic or hazardous waste, the words "herbicide" and "pesticide" appear only in Section 60.1.7. "Glyphosate" appears nowhere. I also reviewed the titles of the Code's amendments and found none addressing herbicide or pesticide use. If TRPA has made findings that herbicide application at this scale has no substantial effect on the region's resources — the standard the Compact sets for exempting an activity from review — I have not been able to locate them, and I would ask the Committee where they are.

If the activity is not exempt, Section II.A.4 requires the Forest Service to provide TRPA with a complete application for review.

3. The Code applies either way — and the alternatives question is unanswered.

MOU Sections II.A.2 and II.A.3 commit the Forest Service to conduct even *exempt* activities in accordance with the TRPA Regional Plan and Code. So Code section 60.1.7 applies to this project whether or not review is required.

As the staff report notes, 60.1.7 discourages pesticide use and calls for consideration of alternatives to chemical application. TRPA's own May 27 letter invokes this policy directly.

The Forest Service has adopted much the same logic voluntarily. Its public FAQ states that where manual methods can be used and are effective, that is the preferred approach. So there is no disagreement about the standard. The question is whether it has been applied, and how anyone outside the agency would know.

The FAQ gives reasons that manual methods won't work: steep slopes, distance from existing roads, sensitive soils, wildfire concerns, and the difficulty of clearing shrubs immediately around planted seedlings. What I cannot find is the analysis behind the reasons — which acres, what slope threshold, how much of the 2,400–3,600 acres each constraint accounts for. A determination is not an evaluation, and these reasons appear in public messaging rather than in the project's environmental documentation.

The whitebark pine exception is also telling. The Forest Service committed to manual site preparation within whitebark pine stands, which occur above 7,800 feet — at the upper elevations of the project area and well above the roads that serve it. If manual crews can work there, distance from roads cannot by itself explain where manual methods are ruled out elsewhere.

Having hiked this area for many years, much of it off trail, I'd add that most of the burn area is not especially rugged. More importantly, the herbicide methods described are themselves hand-applied, using backpack sprayers on foot. Access alone, then, cannot account for the full 2,400–3,600 acres. The Committee may wish to ask how much it does account for.

If 60.1.7 means anything, the acreage where manual methods are genuinely infeasible should be identified and documented — not assumed. The FAQ states that herbicide is "proposed only on a subset of the area proposed for reforestation," which means that subset has presumably been identified. The Committee should be able to see it. So should the public.

4. Requested direction.

The staff report asks the Committee to direct staff on next steps. I would respectfully suggest three:

a) Direct staff to make a written determination as to whether herbicide application at this scale falls within the MOU's reforestation exemption, and to return that determination to the Committee.

b) Direct staff to obtain the confirmation requested in TRPA's May 27 letter — that no herbicide treatments will be applied within the Basin portion of the project prior to interagency review — and report whether it has been received.

c) Direct staff to return with options for amending Code section 60.1.7 to prohibit rather than discourage synthetic herbicide use within the Lake Tahoe Basin.

Thank you for taking the time to give close scrutiny to the Caldor Fire Restoration Project. Given its potential environmental impacts and long-term risks to Tahoe forest users and nearby communities, it would be a mistake to let this project proceed under an exemption that was almost certainly never intended to cover it.

With no herbicide application scheduled until 2028, there is time to get this right.

Respectfully submitted,

Reid Reichardt
South Lake Tahoe, CA
reidtahoe@fastmail.net

To: Environmental Improvement Program Committee, TRPA Governing Board
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Date: August 24, 2026
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This project was approved under an emergency action determination that eliminated the public's formal opportunity to object before implementation, and its Human Health Risk Assessment cites a safety review retracted in December 2025 as ghostwritten by Monsanto employees. The World Health Organization classifies glyphosate as a probable human carcinogen, and in 2021 the EPA found it likely to adversely affect over 90% of endangered species.

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c) Direct staff to return with options for amending Code section 60.1.7 to prohibit rather than discourage synthetic herbicide use within the Lake Tahoe Basin.

Thank you for taking the time to give close scrutiny to the Caldor Fire Restoration Project. Given its potential environmental impacts and long-term risks to Tahoe forest users and nearby communities, it would be a mistake to let this project proceed under an exemption that was almost certainly never intended to cover it.

With no herbicide application scheduled until 2028, there is time to get this right.

Respectfully submitted,

Reid Reichardt
South Lake Tahoe, CA
reidtahoe@fastmail.net

From: Katja Wick <katjawick@googlemail.com>
Sent: 8/24/2026 1:20:24 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public comment - Prohibit glyphosate herbicide spraying Lake Tahoe Basin

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To whom it may concern:

I strongly oppose the spraying of herbicides in the Lake Tahoe Basin.
Although I am a Bay Area resident, I visit Lake Tahoe often and can't imagine having to worry about glyphosate contamination. I might not be able to continue coming to this beautiful region if the use of the herbicide is allowed. I am sure other visitors feel the same, and allowing this might negatively impact not just the environment but also the local economy.
Please prohibit glyphosate herbicides in the Lake Tahoe Basin.

Thanks,

Katja Wick

From: C R Vogel <crzoa@yahoo.com>
Sent: 8/24/2026 3:06:11 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Environmental Improvement Program Committee of the TRPA Governing Board Meeting Aug 26

Glyphosate is toxic to plant and animal life. The studies saying it's safe were ghostwritten by the manufacturers of the chemical as pointed out in the article https://www.motherjones.com/politics/2026/04/roundup-glyphosate-spraying-forests-monsanto-science-retraction-cancer-health-concerns-maha-trump-executive-order-supreme-court-bayer-lawsuits/.

The herbicides can affect the ecosystem for decades, according to the Forest Service's own 2025 report (https://embed.documentcloud.org/documents/28538634-20250325-caldorrest-botanybe-final/?embed=1, which found many native plants will be replaced by invasive species after large-scale herbicide spraying. A study published in the journal *Forest Ecology and Management* in 2010 https://www.sciencedirect.com/science/article/abs/pii/S0378112710001799 found that herbicide use for reforestation resulted in fewer native plants growing back and instead resulted in "significantly greater" invasive species taking root in the replanted forests.
"This is a particularly destructive way to manage the forest," says Jun Bando, executive director of the California Native Plant Society, who holds a PhD in ecology from University of California, Davis. "There is long-term ecological damage."

> By removing native plants, she explains, the Forest Service is harming wildlife that depend on them, including mammals, birds, and insects. It also might be increasing wildfire risk, she says, because many of these invasive species, such as the French broom shrub, are what fire experts refer to as "flash fuels," meaning they are more likely to catch fire and kill the replanted trees. This idea is backed up by the 2010 study, which found that the most common invasive grass to take root after herbicide spraying is cheatgrass and that this invasive plant burns nearly 10 times more frequently in Western ecosystems than the native shrubs that normally repopulate after forest fires.

Furthermore, if as planned the surviving trees and plants are killed to make way for lumber replanting these fire resilient plants are removed from the gene pool.

The Forest Service inadequately posts signage on sprayed areas, where we forage food, hike, ski, camp, bike and swim. The public needs to know where and when areas have been sprayed for the long term so we can decide how we want to interact with the area. If the plant life that supports animal life is killed, there will be more pressure on bears, coyotes, mountain lions forcing them into our neighborhoods and causing problems.

We need to stop the use of herbicides in our forests now!

Sincerely,
Charles Vogel

From: Chuck and Bo <chuckandbo@yahoo.com>
Sent: 8/24/2026 3:01:10 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Environmental Improvement Program Committee Agenda Item No. 5.A Discussion Regarding Herbicide Use Associated with the Caldor Fire Restoration Project Staff Report

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It is absolutely absurd that this is a plan of action. There have been fires for millions of years in the world, and the native plants are there still surviving. It is a harebrained idea that people think they can do better than letting nature take care of itself. How much money did Monsanto give the tRUMP campaign? Would lumber be an issue if the Orange Blob knew what he was doing with tariffs, and not pissed off Canada. I am sure that there will be a class action lawsuit from this travesty that will contribute to the National, State, and County deficit. STOP THE SPRAY!

Charles Vogel
6212 Chablis Drive
Shingle Springs, CA

From: Evon Hekkala <ehekkala@fordham.edu>
Sent: 8/24/2026 7:44:23 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: Glyphosate comment

Dear TRPA,
As a former EPA scientist and researcher who has long term studies ongoing in the Meyers area, I urge you to reconsider the use of glyphosate in the area and Tahoe Basin generally.
In addition to the known harms of glyphosate to both human and ecological health, our research projects in areas targeted for glyphosate application indicate that small mammals are contributing to post fire forest recovery via seed dispersal and the dispersal of fungi on which the seedlings and mature conifer trees depend.
The application of glyphosate will disrupt active seed dispersal and recovery by depriving small mammals of cover and seed caches. Glyphosate will also negatively impact recovering pollinator communities which depend on flowering shrubs and herbaceous vegetation.
Lastly, from my own work at the US EPA, it is well know that glyphosate has harmful impacts on amphibians and other aquatic life as it enters the waters through run off.
The potential harms of such an application in vulnerable ecosystems such as the Tahoe Basin far outway any beneficial impacts.
Please reconsider introducing this unnecessary and toxic substance into these delicate and recovering wildlife habitats on which we all depend.
Sincerely,
Evon Hekkala,
Professor and Chair,
Department of Biological Sciences
Fordham University

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NOTE: I realize that this email may have been sent outside of your regular work schedule and that everyone has their own time allocation system. Please feel free to respond as is relevant to your own schedule.

Dr. Evon R. Hekkala (she/her)
Professor and Department Chair
Director of the Conservation Certificate Degree Program
Department of Biological Sciences
Fordham University
441 East Fordham Road, NY 10458
917-478-9790
Lab website: https://hekkalalab.wordpress.com/people/principal-investigator-pi/

From: Chuck and Bo <chuckandbo@yahoo.com>
Sent: 8/24/2026 10:29:29 AM
To: Public Comment <PublicComment@trpa.gov>
Cc: C. R. Vogel <crzoa@yahoo.com>;
Subject: Environmental Improvement Program Committee of the TRPA Governing Board Meeting Aug 26

Glyphosate is toxic to plant and animal life. The studies saying it's safe were ghostwritten by the manufacturers of the chemical as pointed out in the article https://www.motherjones.com/politics/2026/04/roundup-glyphosate-spraying-forests-monsanto-science-retraction-cancer-health-concerns-maha-trump-executive-order-supreme-court-bayer-lawsuits/.

The herbicides can affect the ecosystem for decades, according to the Forest Service's own 2025 report (https://embed.documentcloud.org/documents/28538634-20250325-caldorrest-botanybe-final/?embed=1, which found many native plants will be replaced by invasive species after large-scale herbicide spraying. A study published in the journal *Forest Ecology and Management* in 2010 https://www.sciencedirect.com/science/article/abs/pii/S0378112710001799 found that herbicide use for reforestation resulted in fewer native plants growing back and instead resulted in "significantly greater" invasive species taking root in the replanted forests. "This is a particularly destructive way to manage the forest," says Jun Bando, executive director of the California Native Plant Society, who holds a PhD in ecology from University of California, Davis. "There is long-term ecological damage."

> By removing native plants, she explains, the Forest Service is harming wildlife that depend on them, including mammals, birds, and insects. It also might be increasing wildfire risk, she says, because many of these invasive species, such as the French broom shrub, are what fire experts refer to as "flash fuels," meaning they are more likely to catch fire and kill the replanted trees. This idea is backed up by the 2010 study, which found that the most common invasive grass to take root after herbicide spraying is cheatgrass and that this invasive plant burns nearly 10 times more frequently in Western ecosystems than the native shrubs that normally repopulate after forest fires.
>
> Furthermore, if as planned the surviving trees and plants are killed to make way for lumber replanting these fire resilient plants are removed from the gene pool.
>
> The Forest Service inadequately posts signage on sprayed areas, where we forage food, hike, ski, camp, bike and swim. The public needs to know where and when areas have been sprayed for the long term so we can decide how we want to interact with the area. If the plant life that supports animal life is killed, there will be more pressure on bears, coyotes, mountain lions forcing them into our neighborhoods and causing problems.
>
> We need to stop the use of herbicides in our forests now!
>
> Sincerely,
> Belinda Breyer

From: Shivon O'Brien <shivonobrien@gmail.com>
Sent: 8/22/2026 6:58:07 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public comment - Prohibit glyphosate herbicide spraying Lake Tahoe Basin

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TRPA please help stop glysophate spraying.

Thank You! ����
Sincerely,
Shivon O'Brien
TahoeNanny.com

From: Kathryn Bricker <brickerkathryn@hotmail.com>
Sent: 8/22/2026 10:02:18 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: Environmental Improvement Program Committee Regarding Herbicide Use

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Committee Members:
I strongly oppose the use of herbicides in the Tahoe Basin for any reason, including Caldor Fire restoration.
These chemicals are proven poisons that injure all human and non-human members of the ecosystem.
Alternative methods can and should be implemented as needed.
The fact that this is even being considered by a group tasked with protecting the environment is incredulous.
It is no wonder faith in government is as low as it is measured to be.
Please use your authority to block this.
Kathryn Bricker
Tahoe Douglas resident

From: Albert Obenauf <lrrl@sbcglobal.net>
Sent: 8/22/2026 4:50:57 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: Change the Code of Ordinances and prohibit conventional herbicide spraying.

Hi, Please change the Code of Ordinances and prohibit conventional herbicide spraying in the Tahoe Basin Watershed.

Thank you,
Albert and Tammy Obenauf
633 Village Blvd
Incline Village, NV 89451

From: Amanda Kinley <amanda_kinley@yahoo.com>
Sent: 8/21/2026 12:07:16 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Wednesday, August 26, 2026 Meeting - PUBLIC INTEREST COMMENT - Glyphosate

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To the TRPA Governing Board:

I am writing in strong opposition to the U.S. Forest Service's plan to apply glyphosate across thousands of acres in the Lake Tahoe Basin as part of the Caldor Fire Restoration Project.

TRPA's founding mission under the 1980 Bi-State Compact is to preserve, restore, and enhance the unique natural and human environment of the Lake Tahoe Region. The Compact specifically directs TRPA to "ensure an equilibrium between the region's natural endowment and its manmade environment." Permitting widespread herbicide application directly contradicts that mandate.

TRPA's Environmental Threshold Carrying Capacities were established to protect the basin across water quality, soil conservation, vegetation, and fish and wildlife. Glyphosate application in proximity to the Upper Truckee River, Trout Creek, and other sensitive waterways puts those thresholds at real risk.

The public was told no spraying would occur in 2026 or 2027. That assurance has now been walked back. This pattern of incomplete disclosure undermines community trust and TRPA's role as an accountable steward of this basin. TRPA has lost the trust of the community, and even backpack spraying, as detailed in the newsletter, is highly suspect.

TRPA's own regulations discourage terrestrial herbicide use. I urge the Board to go further and formally oppose this plan, demand the Forest Service explore non-chemical alternatives, and use every tool available under the Compact to protect Tahoe's water quality and ecosystem from this threat.

Thank you.

Amanda Pruyn
South Lake Tahoe, CA

From: Linda Granato <l_granato1@yahoo.com>
Sent: 7/25/2026 12:50:22 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Comment on USFS Herbicide plan for governing board meeting 8/26/2026

Hello,
Please consider this comment as my individual submission. I want my voice to count. I want my vote to count.

1. "Please update your Code of Ordinances to ban all synthetic herbicides in the Tahoe Basin."
2. "In the Caldor burn area, please allow hand-crew thinning only."
3. "Please require an application and review process for the USFS herbicide plan, because what the USFS describes in its plan does not meet any TRPA review exemptions."

Respectfully ,
Linda Granato
Philadelphia, Pa
Yahoo Mail: Search, Organize, Conquer