From: Laura Patten <Laura@keeptahoeblue.org>
Sent: 4/21/2026 11:49:37 AM
To: Public Comment <PublicComment@trpa.gov>
Cc: jesse@keeptahoeblue.org <jesse@keeptahoeblue.org>; DarcieGoodman-Collins <Darcie@keeptahoeblue.org>;
Subject: Comments from Keep Tahoe Blue on TRPA EIP Item 5.C.
Attachments: image001.png , 2026.04.21 KTB Comments 5C Threshold Update Priorities.pdf

---

Good morning,

Please see the attached comments on behalf of Keep Tahoe Blue on TRPA Governing Board EIP Committee Item 5.C. Please let me know if you have questions.

Thanks,
Laura

Laura Patten
Natural Resource Director, Keep Tahoe Blue
Subscribe | Instagram | Facebook | LinkedIn | Donate
2877 Lake Tahoe Boulevard, South Lake Tahoe, CA 96150 | 530.541.5388 ext.206 | keeptahoeblue.org

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

KEEP TAHOE BLUE
Protecting Tahoe Since 1957

advocate | engage | create

April 21, 2026

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

Submitted via email

Re: Agenda Item 5.C. Threshold Update Priorities (2026–2027 Work Plan)

Dear Chair and Members of the Environmental Improvement Program Committee,

On behalf of the League to Save Lake Tahoe (Keep Tahoe Blue), thank you for the opportunity to provide comment on Agenda Item 5.C regarding the proposed threshold update priorities for the 2026–2027 work plan. We write to strongly support the proposed motion to advance these priority updates to the Governing Board.

Keep Tahoe Blue appreciates TRPA staff's continued efforts to modernize environmental threshold carrying capacities to ensure they are measurable, grounded in the best available science, and aligned with current environmental conditions and management needs. As noted in the staff report, many existing thresholds date back to their original adoption in 1982 and require updates to remain relevant and effective in guiding environmental decision-making.

Importantly, this work is not only good policy but also required by the Tahoe Regional Planning Compact (Compact). The Compact directs TRPA to adopt and maintain environmental threshold carrying capacities and to ensure that regional plans and implementing actions are designed to "achieve and maintain" those thresholds (Compact, Article V(c)). It further requires that thresholds be based on the best available scientific evidence and be periodically evaluated and updated to reflect changing conditions (Article II(i), Article V(c)).

We are particularly encouraged by the three priority areas identified:

- Biodiversity: Advancing an integrated framework that reflects the interdependence of wildlife, fisheries, and vegetation is essential to managing Lake Tahoe's fragile ecosystem in the face of climate change and emerging stressors. This approach is consistent with the Compact's requirement to protect ecological values and maintain environmental thresholds across interrelated resource systems.
- Recreation: Updating existing policy statements into measurable standards is long overdue and will provide a clearer basis for evaluating recreational capacity and impacts. Measurable standards are necessary to demonstrate threshold attainment, as required under Article V(c).
- Technical Review: Addressing the 36 standards identified in the 2023 Threshold Evaluation as either implemented or lacking sufficient data or targets is critical. Without measurable baselines and defined outcomes, it is not possible to determine whether TRPA is meeting its Compact mandate to achieve and maintain thresholds.

While we strongly support moving these priority updates forward, this effort should be viewed as part of a broader and ongoing need to fully modernize all TRPA threshold standards and continue to update these

regularly as part of adaptive management. The 2023 Threshold Evaluation highlighted persistent gaps where standards lack measurable targets or sufficient data, underscoring the urgency of this work.

Thresholds that lack clear, measurable targets or rely on outdated scientific assumptions risk undermining TRPA's ability to demonstrate compliance with the Compact's core mandate. Just as an Environmental Impact Statement must rely on current baseline conditions and sound science, threshold standards must reflect present-day ecological realities to remain legally and scientifically defensible.

We encourage TRPA to continue building toward a comprehensive, Basin-wide threshold modernization effort ahead of the next threshold evaluation cycle at the end of 2027, consistent with the Compact's adaptive management framework. All updated thresholds need to be specific, measurable, outcome-driven, and supported by robust monitoring frameworks, enabling clear findings of attainment or non-attainment.

While updating these thresholds, TRPA should have strong coordination with the Tahoe Science Advisory Council and partners to ensure that updates reflect the best available science, as required under the Compact. The threshold system is the guiding star of environmental governance in the Tahoe Basin. Ensuring that thresholds remain modern, measurable, and actionable is essential not only for environmental outcomes, but for TRPA's ability to achieve its mission.

Thank you again for your leadership and for advancing this important work. We respectfully urge the Committee to recommend approval of the proposed threshold update priorities.

Sincerely,

Laura Patten

Natural Resource Director