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**Sent:** 10/11/2023 11:42:10 AM  
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**Subject:** Public Comment - Oct 11th meeting -Changes to the TRPA Environmental Thresholds

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PLEASE ACCEPT THIS EMAIL AS A POST PUBLIC COMMENT TO OCT 11 2023 MEETING OF THE TRPA ADVISORY PLANNING COMMISSION  
cc: members of the TRPA Advisory Planning Commission members

Dear TRPA Advisory Planning Commission,

THANK YOU for seeing the necessities of definitive thresholds whether they are attained or not. It is a daunting task to keep the TRPA bi-state compact on target to keep its main objective in protecting the lake. I'm glad it was recognized by the commission that threshold targets should be targeted and details regarding any deviation therefrom in threshold evaluation reports explained. While a statement of intent is seen as too broad.

As indicated in the meeting, all four of the proposed Environmental Thresholds that TRPA proposes to change are ones are in currently in question of being attained in the next publicly available Threshold Evaluation 4 year report (next year). TRPA staff are fearful that thresholds will not be attained as is and as a result be an ultimate detriment to put proposed Regional Plan and code changes in front of the public. Thresholds have been slipping and we need to keep the definitions of targeted thresholds in place and give explanatory reason and mitigation to any deviation. Sorry this is more work.

The timing of these proposals is purposeful and they were in hopes of getting these passed today.....next month the TRPA is pushing forward amendments to the 2012 Regional Plan to increase height and density WITHOUT a current Cumulative Environmental Impact Report instead providing a Environmental Checklist. TRPA staff is in hopes to making these proposed changes prior to consideration of amendments next month so that Regional Plan amendments are easier to pass, as they meet the "checklist".

**I also want to point out this past week, Attorney General Bonta joined a Comment Letter in Support of Proposal to Strengthen Federal NEPA Regulations (Press Release Oct 3, 2023, [LINK Here](#)),**

In their comment letter, the attorneys general supports CEQ's proposal and recommend additional changes to strengthen the rule, including:

- **Strengthening analysis of climate change effects in all types of NEPA review, including requiring consideration of climate change effects when conducting environmental reviews of proposed actions that do not require preparation of an environmental impact statement.**
- **Providing direction to agencies on how to evaluate cumulative disproportionate adverse effects on environmental justice communities.**
- Incorporating provisions of CEQ's previously published greenhouse gas emissions guidance.

I would ask the TRPA Advisory Planning Commission to ask TRPA staff to consult with the Attorney General's office for when revising these environmental thresholds to best meet the necessary strengthened Federal NEPA Regulations and CEQA guidelines.

Thank you for your time and consideration.

*Niobe Burden Austere*  
*Concerned property owner in Tahoe Vista*

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PS What is an appropriate target for microplastics ? NONE?!