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PM

to **Elizabeth@Waterboards, Brian@waterboards, Jan@Waterboards,**
Laurie@Waterboards, Patrice@Waterboards, me, Ben@Waterboards,
Andrew@Waterboards, Mary@Waterboards, Melissa@Waterboards, Scott@Waterboards

Hi Alan,

Thanks for the offer for research resources to investigate microplastics in Lake Tahoe. There are a couple of topics in your previous email correspondence that I want to address:

1. You have raised a concern that microplastics from the monopine cell tower project proposed to be constructed on Ski Run Blvd may discharge to surface waters and therefore the project proponent, Verizon/NEL, may be subject to waste discharge requirements under California Water Code 13260. My decision is to not issue a 13260 request for a report of waste discharge at this time because the project proponent proposes to perform periodic site inspections and collect/remove fallen faux needles from the cell tower site pursuant to TRPA permit requirements to ensure there is no migration of faux needles off site into the environment. This project has not been constructed yet, and there is no evidence before me to indicate that TRPA permit requirements are inadequate to prevent offsite discharge to surface waters. My team will, however, schedule joint inspections with TRPA and Verizon/NEL project operators to evaluate the efficacy of the TRPA permit requirements to protect water quality. We will make the decision to issue a request for a report of waste discharge if our inspections or other environmental data compel regulatory action by the Water Board.
2. You asked that I issue a California Water Code 13267 Investigative Order to cell tower owners in the Tahoe Basin. Lahontan Water Board staff have already begun an investigation of the microplastic complaint you have raised. While I agree that more information will certainly support our next steps, I do not believe an investigative order is necessary at this time. Our Lahontan team is working collaboratively with TRPA to identify other monopine cell towers in the basin and their proximity to storm drains and/or surface waters. We expect to gather that information from TRPA within the next week or two.
3. You asked to be informed of the actions the Water Board intend to pursue to address your concerns. Here are the key elements the team will endeavor to take:
 - a. Gather pertinent TRPA records from the Ski Run permit application regarding faux pine needle composition and chemistry.
 - b. Gather monopine cell tower geospatial data from TRPA to evaluate proximity of monopine cell towers to storm drains and surface waters.
 - c. Reach out to Verizon/NEL to gather chemical data on monopine faux needles to supplement data gaps in TRPA records we obtain.
 - d. Coordinate with Desert Research Institute, TSAC, TRPA, USFS, and other agencies on microplastic source studies.
 - e. Schedule joint site inspection following construction of the Ski Run monopine

project with TRPA and Verizon/NEL. Other sites may also be inspected pending evaluation of the geospatial data we gather from TRPA.

- f. Elevate this issue to the State Board Stormwater Roundtable at the June meeting.
4. You have asked to review our records for WDRs associated with Heavenly Valley, Northstar and Homewood. I am forwarding this Public Records Act request to our team to assign a person to coordinate with you and track your PRA request. The PRA request will be handled by a Lahontan staff person most familiar with the files you have requested, and you will be contacted by that person to schedule file review. You can provide that person with more details on what exactly you are interested in reviewing.
5. Thank you for your follow-up and invitation to collaborate with Columbia University representative Joachim Goes on a microplastics study. This offer sounds like a great opportunity for future research in the Tahoe Basin. That is certainly great news as there is very little information on the sources of microplastics in alpine surface waters. Please feel free to contact Dr Melissa Thaw on our team on this opportunity. I would also ask that you and the Columbia University research team also reach out to the Desert Research Institute to assess microplastic data gaps and research opportunities.
6. Lastly, please coordinate with Mary Fiore-Wagner, Nonpoint Source Unit supervisor on any additional questions or comments you may have on actions the team is taking to address your microplastic and monopine faux needle concerns.

I appreciate your passion for water quality and the health of the Tahoe Basin and am glad it continues to resonate with you after retirement from State service Alan. Be well and thanks!

/r

Mike