From: Jay Gudebski
Sent: Tuesday, October 20, 2026 9:52:51 PM
To: CSLC CommissionMeetings
Subject: Item 58: Opposition to the proposed Lake Tahoe Benchmark rates and request for postponement
Sensitivity: Normal

Attention: This email originated from outside of SLC and should be treated with extra caution.

To the CA State Lands Commissioners:

I am a long-time Lake Tahoe west shore landowner and I strongly oppose the updated Category 1 and Category 2 Lake Tahoe Benchmark rental rates. I respectfully urge the Commission to delay action on Item 58 and reconsider the methodology used to establish rent for private recreational piers and buoys on Lake Tahoe. I take issue with numerous parts of the benchmark methodology, but I will limit my opposition comments here to a few main points:

1. Public Benefit of Residential Piers and Buoys on Lake Tahoe

For decades, private piers and buoys were recognized as providing public benefits in addition to private recreational use. Private owners paid for the construction, maintenance, repair, and replacement of these facilities, relieving the State of those costs while helping create a lake-wide network of safe harbor and emergency access points for boaters. Private piers and buoys continue to provide boating safety, emergency refuge, and public benefits that should be recognized when establishing any rent structure. I alone have numerous instances of boats adrift, broken down or in distress that have taken safe harbor on my buoys to avoid being smashed upon the shoreward boulders.

The current benchmark methodology fails to account for these public benefits and instead treats private recreational facilities as if they were commercial assets. This fundamental assumption is flawed.

2. Residential Rates should not be based on Commercial Marinas

Commercial marinas and private recreational piers and buoys are not comparable uses. Commercial marinas exist to generate income. A commercial buoy or pier lease includes not only a profit margin, but all the expenses incurred to run the business, such as transportation, staffing, maintenance, fuel, storage, repairs, overhead and amenities. Private recreational owners cannot rent their piers or buoys and derive no income from them. As a result, it is neither fair nor economically rational to base private lease rates on commercial rental rates. **The methodology attempts to value personal-use facilities as though they were revenue-producing businesses when they legally cannot be used that way.**

The commercial market itself is also distorted by government-imposed supply restrictions. State and local agencies strictly limit the number of slips and buoys that may be installed on Lake Tahoe. When supply is artificially constrained and demand exceeds availability, commercial rental rates naturally rise. Those elevated commercial rates reflect regulatory scarcity rather than the value of submerged lands. Yet those distorted commercial rates are then used to establish rent for private recreational facilities. **This results in private leaseholders effectively paying for a market condition created by government restrictions rather than by true market competition.**

Moreover, Commission policies themselves contribute to this scarcity. Private buoy owners are prohibited from renting their buoys, even when those buoys sit unused for much of the boating season. This further reduces available mooring opportunities, increases demand for commercial marina space, and contributes to higher commercial rental rates. **Those same inflated commercial rates are then used in the benchmark calculation, creating a circular process that artificially drives private recreational lease rates higher.**

3. Annual CPI adjustments for submerged land is entirely inappropriate

Unlike a commercial landlord, the Commission does not incur increasing operating, maintenance, insurance, payroll, or service costs associated with a recreational buoy or pier lease. CPI adjustments are intended to help landlords recover increasing costs associated with operating and maintaining income-producing property. In the case of recreational pier and buoy leases, however, the State is leasing the use of lakebed. **The area occupied, the nature of the use, and the burden on the State remain essentially unchanged from year to year, regardless of inflation.** The State's asset is the lakebed itself. Unlike a commercial building, marina operation, or rental property, the submerged land does not experience increasing operating costs, maintenance costs, labor costs, or capital improvement costs as inflation rises. Yet under the current methodology, recreational lessees are charged as though such costs exist. Applying annual CPI increases to recreational leases creates escalating rent obligations without any corresponding increase in services, costs, or value provided by the State. In 2014, Commission discussions believed that CPI adjustments would provide modest, predictable changes. Instead, recent inflationary periods have resulted in substantial compounded increases that far exceed original expectations and undermine the transparency and predictability that lessees were promised.

Alternatives to consider

Other jurisdictions have recognized the distinction between private recreational and commercial waterfront uses. Washington State allows qualifying private recreational docks and mooring buoys on certain state-owned aquatic lands without rent when they are used exclusively for recreational purposes and cannot be commercially leased. This approach recognizes that a private recreational facility is fundamentally different from a revenue-producing commercial operation and should not be valued under the same framework.

The Commission should develop a rent methodology that recognizes the public benefits of private piers and buoys, acknowledges the fundamental differences between recreational and commercial uses, eliminates the distortions created by government-imposed supply limitations, and removes CPI escalators that bear little relationship to the actual use of submerged lands. A fair framework should be based on the nature of the recreational use itself, not on commercial marina rates derived from a constrained and highly regulated marketplace.

Thank you for your consideration.

Sincerely,

Jay Gudebski

From: Wendy Jordan
Sent: Friday, October 16, 2026 11:20:10 PM
To: CSLC CommissionMeetings
Subject: REQUEST: Postponement of Item 58 from Agenda 10/21/2026
Sensitivity: Normal

Attention: This email originated from outside of SLC and should be treated with extra caution.

To Whom It May Concern:

I am deeply concerned that the 2026 Lake Tahoe Benchmark, in its current form, is being considered as Item 58 on the October 21, 2026 agenda.

There is no logical basis for determining fees for individual residential buoys using commercial rental rates. Residential buoys owned by individual homeowners generate no income and differ fundamentally from commercial operations such as marinas. Applying a fee structure derived from commercial rental activity to private residential structures is arbitrary, inequitable, and unsupported by sound reasoning.

For decades, residential buoys and piers have been recognized as providing public benefits. Boaters, kayakers, and others frequently rely on them for safety and shelter during emergencies. Nevertheless, in 2021 the state concluded, without providing a compelling rationale, that these structures provide no public benefit. Now, the state proposes fee increases exceeding 200 percent above 2021 levels, again without offering a clear and logical justification for its methodology.

The benchmark is further distorted by government restrictions on the number of structures permitted on the lake. These limitations artificially increase the value of commercial buoy rentals, making such rates an inappropriate basis for calculating fees for residential buoy owners. The appraiser's methodology is fundamentally flawed and appears designed to support what many homeowners view as a disguised tax rather than a fair user fee.

Accordingly, I urge the State Lands Commission to postpone consideration of Item 58 at the October 21 meeting until a transparent, understandable, and equitable methodology can be developed and presented to the public.

I also strongly encourage the Commission to solicit additional public input before voting on these extraordinary rate increases. A decision of this magnitude deserves greater public review, discussion, and scrutiny before any action is taken.

Sincerely,

Wendy E. Jordan

[redacted]

Tahoma, CA [redacted]

Long-time West Shore homeowner and member of the Meeks Bay Vista Home Owners Association

From: [redacted]
Sent: Monday, October 19, 2026 12:46:33 PM
To: CSLC CommissionMeetings
Cc: Bugsch, Brian@SLC; Lee, Ninette@SLC; [redacted]
Subject: Buoy Rates
Sensitivity: Normal

Attention: This email originated from outside of SLC and should be treated with extra caution.

Dear CSLC Senior Staff,

The Commission is scheduled to consider approval of the 2026 Category 1 and Category 2 Lake Tahoe benchmark rental rates. As a family who has owned a cabin at Lake Tahoe for almost 60 years, we are respectfully requesting a continuance/postponement of item 58.

Carol Evans, President of the Meeks Bay Vista Property Owners Association (MBVPOA), and her Board of Directors have raised some serious concerns regarding the **107% increase** for the buoys since the last benchmark rate was established approximately five years ago. That equates to a 20% increase per year. As someone who is not opposed to reasonable, rational, and justifiable rate increases, it strongly appears, based on President Evans and the MBVPOA Board's research, that the CSLC's **calculations are flawed.** By using a skewed, high value "outlier" (Homewood Marina) in the data research, the "outlier" dramatically impacts the rental rate to a higher degree. The research also appears to show that the Timber Cove Marina, which has a lower rental rate, wasn't fully analyzed. Had Timber Cove Marina been appropriately analyzed, it would have lowered the rate increase.

Please approve a continuance of item 58 as it dramatically impacts 3,000 buoys on Lake Tahoe and the families that use them.

Again, a reasonable rate increase is acceptable but it defies logic to impose a 107% increase over a five-year period as proposed by CSLC staff.

Thank you for your consideration as you now have constructive knowledge of a potential flaw in the analysis and calculation of the potential rate increase.

Sincerely,

William (Bill) J. Lyons, Jr.
Mape's Ranch/Lyons' Investments
[redacted]
Modesto CA [redacted]

Notice: This communication and any attachments ("this message") may contain confidential information for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination or distribution of, or reliance on this message is strictly prohibited. If you have received this message in error, or you are not the authorized recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system and destroy any printed copies.

October 19, 2026

TO: Commissioners, California State Lands Commissions

FROM: Carol Evans, President, Meeks Bay Vista Property Owners Association

SUBJECT: Agenda Item 58 – October 21, 2026 Commission Meeting
2026 Lake Tahoe Benchmark - OPPOSE
Request Postponement of Consideration

On behalf of the Meeks Bay Vista Property Owner's Association I respectfully request that you delay action on Item 58, the 2026 Lake Tahoe Benchmark. In reviewing information provided by CSLC staff in support of their recommendation for a new 2026 Lake Tahoe Benchmark, I discovered information needing further review and analysis before it can properly come before you for consideration. First, and most immediate, there needs to be further review of the data collected for commercial marina buoy rents.

If you approve the new Benchmark as proposed, you are approving a statistically incorrect 107% increase in the annual buoy rental rates since the rate was last established just five years ago in 2021. The math to produce the number is wrong and needs to be further analyzed. Evidence of this was brought to CSLC staff last week and our request to postpone this agenda item was denied by staff.

What is the rush to decide this now? The vast majority of Lake Tahoe leaseholders were only notified of the new Benchmark rates a month ago. The 2021 Benchmark was approved 9 years after the initial 2012 Benchmark. There have been no public meetings or town halls about these rate increases like there were with the 2021 Benchmark. Please allow time for further analysis and stakeholder input to arrive at fair, reasonable and correct rates. More detailed information can be found in Attachment A to this memo regarding the statistical irregularities contained in the proposed 2026 Benchmark.

Recommendation

There was an enormous amount of work done and expense incurred in developing a supportable 2021 Benchmark. Why do we have to throw that out? Why can't the Commission keep using that Benchmark and simply increase it annually with a capped CPI increase? It would satisfy the Commission's goals of consistency and transparency for stakeholders and efficiency for Commission operations, while still ensuring an ever-increasing flow of revenue to the State. It would avoid the messy and contentious process that a new Benchmark creates every 5 years and would also put new and renewing leases on a more even playing field with existing leases. Call it a Rolling Benchmark or a Hybrid Benchmark. We respectfully request that this recommendation be fully and transparently considered by the Commission before making any decisions on the proposed 2026 Benchmark.

Continuing Issues Plague Lake Tahoe Pier and Buoy Rent

As pointed out in previous letters to the Commission, there is an interaction between the relatively new annual CPI rent increases and the practice of setting rents using a benchmark that is producing unintended consequences. As stated in the Commission staff report, the use of benchmarks improves consistency, transparency, and efficiency in how the Commission establishes rent. As will be shown below, however, the manner in which CSLC staff has chosen to apply annual CPI increases has caused rent inconsistencies among lessees, deviations from the benchmark and an amazing lack of transparency.

We maintain our position that an annual CPI increase is not justified for the use of lake bottom which has no associated annual cost increases to the lessor, but we concede that ship has sailed and is not likely coming back to port. But it has become crystal clear that the ship never followed the charted course when it set sail in 2014.

The staff assumption publicly stated at a Commission meeting in October 2014 was that the CPI increase would continue tracking around 1.9% per year, lessees would have certainty and transparency about their annual rent increases, and CSLC would save on administrative costs by eliminating the 5 year mid-lease rent review. The reality, however, is that the uncertainty has increased and there is no transparency.

To clearly demonstrate the problem to myself and others, I analyzed our actual experience for our own lease for a pier and 2 buoys. For background, we obtained a new lease in October 2012 for a pier extension into state sovereign land and 2 existing buoys. The timing was shortly after the passage of SB 152 in 2011, which instituted rent for Lake Tahoe pier and buoy leases. We were among the first leases subject to rent instead of the former policy of charging an administrative fee for buoy and pier permits. We first became subject to the annual CPI rent increases when our lease renewed in 2022. We have a relatively short, but dramatic, 4 year history with the dynamic of annual uncapped CPI increases.

In the table below I used a hypothetical starting rent of $1,000 in 2022 (lower than our actual rent, but it makes it easier to follow the calculations and yields the same compounded increase results for any rent amount). For an October lease renewal, CSLC uses the February CPI index from the prior year, i.e., our first CPI increase for 2023 rent was based on the increase in the CPI from February 2021 to 2022. An annual uniform rate for all leases is not used.

As you can see in the table below, we have experienced a significant increase in our rent, 20.5% in four years and it will be a 24.0% increase in 5 years. That is an average of 5 percent per year since our lease began in 2022. That is in stark contrast to the staff-projected increases of 1.9% per year. I also calculated what the rent increases and the compounded interest would have been if the CPI increases had been capped at 2 percent to track the staff assumptions. The difference is significant - a 24.0% actual rent increase vs. a staff assumption of 10.4% - more than double the assumption.

Index Month of February for October Lease Renewal

Lease Beginning in 2022

Rent Year	CPI Increase	Rent	Compounded CPI Increase		Rent @ 2% Cap	Compounded CPI Increase
2022		1,000				
2023	7.4%	1,074	7.4%		1,020	2.0%
2024	5.4%	1,132	13.2%		1,040	4.0%
2025	3.3%	1,169	16.9%		1,061	6.1%
2026	3.1%	1,205	20.5%		1,082	8.2%
2027*	2.9%	1,239	24.0%		1,104	10.4%

*Projected based on already published February 2025-2026 CPI increase

Next, I wondered if our experience was an anomaly pertaining only to leases with a February index. In the table below I looked at each index month's percentage CPI increase for a $1,000 lease starting in 2022, using data from the Department of Industrial Relations, for All Urban Consumers, the same data used by CSLC.

Comparison of Compounded CPI Interest and Rent for Each Index Month for a 2022 Lease

Index Month	2022 Base Rent	2023	2024	2025	2026	2027	4 Year Compounded CPI Increase	5 Year Compounded CPI Increase
February CPI		7.4%	5.4%	3.3%	3.1%	2.9%	20.5%	24.0%
Rent	1,000	1,074	1,132	1,169	1,206	1,240		
April CPI		7.7%	4.2%	3.8%	2.7%	3.6%	19.6%	23.9%
Rent	1,000	1,077	1,122	1,165	1,196	1,239		
June		8.3%	3.1%	3.3%	3.0%	3.4%	18.8%	22.8%
Rent	1,000	1,083	1,117	1,153	1,188	1,228		
August CPI		7.5%	3.6%	2.7%	3.3%	n/a	18.2%	n/a
Rent	1,000	1,075	1,114	1,144	1,182			
October CPI		7.3%	3.2%	2.5%	3.3%*	n/a	17.2%	n/a
Rent	1,000	1,073	1,107	1,135	1,172			
December CPI		5.6%	3.5%	3.0%	3.2%	n/a	16.2%	n/a
Rent	1,000	1,056	1,093	1,126	1,162			
Average		7.3%	3.9%	3.1%	3.1%	n/a	18.5%	n/a
Annual CPI	1,000	1,073	1,115	1,149	1,185			

*An index value was not published for October 2025 due to the federal government shutdown. August 2024 to August 2025 is the closest available period to October for which the required data were published.

What does the above table reveal? First, it shows that a February index did happen to have a higher rent increase than other months. Second, it shows that with an identical base rent starting in the same year, lessees end up paying different rents simply because of the month their lease renews. Third, it shows that the integrity of the Benchmark degrades every year in producing equal rents for equal uses. Fourth, and perhaps most importantly, it shows everyone is being hit with a cumulative CPI increase at least double what was forecast by CSLC staff.

We brought historical CA CPI data to staff in 2014 showing the CPI could be very volatile, but those concerns were not taken seriously. Because of the compounding effect, even one anomalous high inflation year locks in higher and higher rent for the remainder of the lease term.

We own residential and commercial rental properties and are familiar with accepted lease practices. A CPI increase is never an unstated number in a lease. It is never left open-ended. Lessees expect and deserve to know the obligations of the lease they are signing. No one would sign such a lease as we are asked to sign for our piers and buoys. The State of California would not sign such a lease.

If annual CPI increases are here to stay, their application needs to be modified to actually achieve the stated intention of CSLC staff in 2014 and be consistent with everyone's understanding of how it would play out. This can easily be accomplished by capping the annual CPI increases at 2%.

Title 2, California Code of Regulations Section 2003 (1) states: "Authority for rent adjustment during the lease term shall be provided and may include application of the California Consumer Price Index." CSLC does not have to use the CPI. Why not use an adjustment factor with which everyone is familiar – the annual property tax increase formula – California CPI or 2%, whichever is less. It would generously track with the staff assumptions, it would provide certainty and transparency for lessees, and it likely would further reduce CSLC administrative costs. Pick the most recent published index month to use from the prior year and apply to all lease payments for the following year, or 2%, whichever is less.

<u>Actual Rents are All Over the Board</u>

This is the reality of what was demonstrated above – the interaction of benchmark-based rents and the manner in which annual CPI increases are applied has caused us to be paying a different rent than our neighbor of more than 20 years, not only for our identical buoys, but also a different per square foot rent for our neighboring piers. We also do not pay the same rent as a new lease granted earlier this year. New lessees would actually pay less than we do. Their rent would be set according to the 2021 Benchmark at $273. Using the buoy as an easy example, the current benchmark rate is $273 per year, but our rent per buoy is $329 - $56 dollars more. This is because the benchmark rate set in our 2022 lease has increased by 20.5% due to the Commission's annual CPI increases. A new lessee's buoy rent will start going up with a CPI increase, but it will never catch up to our rate. We will continue to pay 20.5% per year more than a new lessee for the next 5 years until our lease renews in 2032 for both our pier and buoy. In the meantime before our lease renews there will be another new Benchmark in 2031. This is the definition of insanity.

Virtually every lessee is paying a different rent for their buoys and piers. There must be some way to harmonize pier and buoy rents that makes more sense than the current process.

Another problem is there is no transparency when it comes to our CSLC leases and rent that informs a lessee about how their rent is calculated every year. As brought up before, we already have no certainty for the entire 10 year term. The lease gives the annual rent for the first year of the lease. There is no explanation as to how the amount was derived or how much was for buoys and how much was for the

pier. Subsequent invoices are equally silent. In our renewal it states the initial rent "for 10 years with an annual Consumer Price Index, Dept. of Industrial Relations adjustment using the month of February." It doesn't tell you that it's not February of the current year even though that index is available for our October renewal/rent due date. I had to call the Commission to understand what they had done. It should have been a very simple thing to provide more specific rent information on the invoice listing the current buoy rent, the current per square foot pier rent, and how the CPI increase is applied and show what the index month rate actually is.

Interaction Between Commercial Leases with CPI Increases and the Benchmark

Another interactive problem is that these extraordinary CPI increases have also been applied to commercial leases that are the basis of the benchmark which determines private pier and buoy rents. They are an artificial influence on the local rental market and should be discounted from the benchmark rent calculation. Marina owners pass on these artificial Commission-imposed CPI inceases in their rental rates as well as their internal inflationary business cost increases. That has the effect of double counting inflation when those commercial rents are used in the benchmark data.

Demand for lake moorings exceeds supply because of supply restrictions imposed by governmental agencies. We can supply our own moorings because of our littoral location and thus lessen demand at the commercial marinas. But our private moorings are not directly comparable to a commercial mooring. A commercial buoy includes a means of transportation to and from a buoy and personnel to support a renter. The renter has immediate access to all marina entities like gas pumps, food, and repair services. There is added value to the location of commercial buoys. Commercial buoys also create value every day of the boating season through rent. We are prohibited from renting our buoys in our leases. They create no value, yet we are charged the same rent as a commercial buoy owner. Marina slip rents are an even less direct comparable, because most private piers do not even provide a mooring, just a means to board and unload passengers.

According to the Commission's methodology, we are being charged rent at the same rate as the commercial marinas. This imputes a value for our private piers and buoys as if we were a business enterprise able to rent our piers and buoys to the public. If we could equally rent our piers and buoys in the open market, then fine. But how is it fair or right to charge us rent based on 5% of gross income attributable to submerged land for a commercial marina - when there is no possibility of income?

The nature of a commercial use and occupancy of submerged land is not the same as a private use and occupancy of submerged land. We should not be paying rent at the same rate as a commercial enterprise. The only similarity between commercial and private piers and buoys is that they were all privately paid for and installed and all costs for maintenance and other expenses are paid by the lessees. Beyond that it is an apples to oranges comparison between revenue producing assets and personal use assets.

The appraisal theory of substitution that is the basis of this methodology also does not hold water. The limited supply of slips and buoys available to the public is due to governmental agency restrictions.

There is nothing available to substitute, meaning in this local situation, substitution is a false theory. We simply would not seasonally moor a boat on Lake Tahoe.

Temporary/Secondary Submerged Mooring Anchor

The new Temporary/Secondary Submerged Mooring Anchor rent is an unjustified reach. We don't happen to need an additional buoy block because we have sufficient lake depth in low water years for both of our buoys. The assumptions that are made in order to justify this new rent opportunity are absurd. No matter which buoy is being used, only one will be used at a time. An idle buoy block has no use or benefit and it is not restricting any lake surface use. Yes, it is occupying a small piece of lake bottom, but so are a lot of other things. There are rocks two to three times the size of a buoy block and even larger in our area. There's an airplane that sank in our bay a few years ago and is still down there, and lots and lots of boats over the years and have found a watery grave on the bottom of Lake Tahoe as well as kayaks and canoes and inflatables and sun hats and beach towels. Are they next on the list to charge rent?

Finally, how is this rent being used?

Around $2 million is collected every year. It all goes to the Lake Tahoe Science and Improvement Fund for "near-shore environmental improvement program activities and projects." In 2025-26 there was a beginning fund balance of over $8 million and an ending fund balance over $6 million. Of the nearly $2 million in expenditures only $350,000 was directed to project funding through the California Tahoe Conservancy. The rest of it funded State Operations, defined as funds used to cover recurring costs such as salaries, supplies, services, and other day-to-day expenses necessary to run state agencies and manage state property. Agencies receiving Lake Tahoe rent funding are the Secretary of Natural Resources Agency, California Tahoe Conservancy, State Water Resources Control Board and Statewide General Administrative Expenditures.

Prior year spending patterns were similar with the majority of expenditures funding ongoing operations rather than Lake Tahoe improvement projects. Using Lake Tahoe rents for supplanting ongoing state agency administrative costs is not what anyone anticipated or supported when this new fund to deposit Lake Tahoe rents was created in 2013. It would be a legitimate and worthwhile idea for the Commission to ask the Natural Resources Agency to prepare a list of historical, current and pending projects funded by our Tahoe rents to be mailed with our rent invoices so we can appreciate the projects our rents are funding.

Attachment A

Statistical Problems with the 2026 Lake Tahoe Category 1 Buoy Rates

When compared to the data for the 2021 Benchmark, the total number of buoys listed for rent was 517, but this year's data only shows 399. Timber Cove Marina is not listed at all despite its California State Parks Department website listing 75 buoys. In 2021 it had the lowest seasonal rental rate. Its omission could increase the average rental rate used to determine the Buoy Benchmark.

There also is a gross outlier in the data. According to staff data, Homewood Marina's rates have increased from $8,295 in 2021 to $24,595 in 2026. That is more than a 200% increase and 45% higher than any other marina on the lake. This has obviously skewed the average rental rate to an extreme degree. It has been a head scratcher as to how the rate could have skyrocketed by 107% since the last Benchmark, a rate of more than 20% per year, and at a much greater rate than slip rents. The missing Timber Cove Marina data and the outlier Homewood Marina are the explanation.

In addition, information on the Homewood Marina website shows the same rental rate applies to either buoy storage or lower dry rack storage and the rates vary according to boat length. The marina costs associated with dry rack storage are very high because the boat has to be forklifted to and from the lake for every use. This rate should be adjusted to reflect the less expensive cost for normal buoy use. This marina now also offers a Lakeside Lounge, which it did not have in 2021, exclusively for storage and service customers (they have no slips), and offers complimentary coffee, water, ice and snacks. This exclusive amenity is unique to this marina and is obviously another reason why their rental rates are higher than any other marina by almost double. There should also be an adjustment for that.

The overriding issue, however, is staff's use of a mean average calculation (add all the rates and divide by the number of marinas) which produced an average seasonal buoy rental rate of $11,294. When there is an extreme outlier in a data set, a mean average gives a misleading picture of what is normal. The correct calculation to use is the median average, which would have produced an average seasonal rate of $8,000. Rather than a new benchmark rate of $565 (11,294 x 5% of gross income attributable to the submerged land, the benchmark rate would have been calculated at $400. If Timber Cove Marina data is added, the rate would likely be even lower. One unique marina should not drive the rate.

In summary, a mean average calculation is used when data is normally distributed or free of outliers. The median average should be used (the middle point between the data points) to determine an average when the data is skewed or there are outliers. A rental rate that is 45% higher than the highest rental rate is an outlier, but was not recognized as such by staff in their recommendation, resulting in a 107% rate incease.

From: Lunetta, Kim@SLC
Sent: Tuesday, September 29, 2026 9:13:24 AM
To: CSLC CommissionMeetings
Subject: FW: File Reference W 27088
Response requested: No
Sensitivity: Normal

From: Stephen Monahan [redacted]
Sent: Monday, September 28, 2026 3:26 PM
To: Wong, Chaun@SLC <Chaun.Wong@slc.ca.gov>
Cc: Bugsch, Brian@SLC <Brian.Bugsch@slc.ca.gov>; Dumlao, Matthew@SLC <Matthew.Dumlao@slc.ca.gov>; Mary Joyce [redacted]
Subject: File Reference W 27088

You don't often get email from [redacted]. Learn why this is important

Attention: This email originated from outside of SLC and should be treated with extra caution.

Dear Chaun Wong,

I am in receipt of your letter of September 18, 2026 regarding increases in Category 1 and 2 Benchmark Rental Rates for Lake Tahoe.

My family has lived in South Lake Tahoe for 33 years. We live on Lake Tahoe, have a dock, boathouse and 2 buoys.

We find the 19.9% increase in the Category 1 Benchmark charges, and the 107% increase in buoys charges to be outrageous. We wish to register our disagreement with these increases and ask that the increases be more like 5%. This feels like another step in the State of California making living here unaffordable which has resulted in resident flight to other states.

We strongly disagree with the proposed rate hikes.

Our physical address is:
Stephen Monahan and Mary Joyce
[redacted]
Smith Lake Tahoe, CA. [redacted]

PLEASE CORRECT:
Our Mailing Address is:
[redacted]

[redacted]
Denver, CO. [redacted]
*********Please correct this in your records immediately**********

Please acknowledge receipt and registration of our complaint.

Thank you,
Stephen Monahan

From: Tony Sloss
Sent: Wednesday, September 23, 2026 3:58:25 PM
To: CSLC CommissionMeetings
Subject: I oppose unfair and excessive proposed Lake Tahoe Benchmark Rate Increases
Sensitivity: Normal

Attention: This email originated from outside of SLC and should be treated with extra caution.

From:
Anthony
Sloss

Tahoma,
CA

Date:
September 23, 2026

To:
Via
Electronic Submission
California
State Lands Commission

Attn:
Executive Office / Public Comment

100
Howe Avenue, Suite 100-South

Sacramento,
CA 95825

Email:
CSLC.CommissionMeetings@slc.ca.gov

Subject:
Public Comment Opposing Proposed Lake Tahoe Benchmark Rate Increases for Category 1 (Piers & Buoys) and Category 2 Leases

Dear
Chair and Members of the California State Lands Commission,

I
am writing as a Lake Tahoe property owner to express my strong opposition to the proposed update to the Benchmark Rent Rates for Lake Tahoe submerged lands—specifically the dramatic increases targeting Category 1 piers ($0.976/sq. ft.), Category 1 buoys ($565/buoy),
and Category 2 non-water dependent structures ($23.85/sq. ft.).

While
I understand the Commission's duty to periodically update rent benchmarks, the current proposal applies an unsupportable valuation methodology that places an unfair, compounding burden on lakefront property owners. I urge the Commission to reconsider and adjust
these rates downward based on the following key points:

1.
Flaws in Valuation Methodology and Upland Comparables

The
proposed rate jumps—including a more than 100% increase on buoy lease fees—drastically outpace standard inflation metrics and economic indicators. Raw submerged lakebed under a pier or buoy does not possess fee-simple residential development rights and cannot
be appraised using raw upland Lake Tahoe real estate appreciation figures. Submerged land cannot be built upon, sold independently, or occupied in the manner of upland residential property; applying upland market escalation factors to submerged public land
significantly inflates its true fair-market rental value.

2.
Failure to Account for Seasonal and Environmental Usability

Unlike
commercial real estate or lower-elevation coastal facilities, Lake Tahoe piers and buoys are subject to severe winter weather, ice, and fluctuating lake levels during drought cycles. During low-water periods, many buoys and pier extensions become completely
unusable for seasons at a time. The proposed benchmark rates treat these assets as year-round, full-utility commercial leases without adjusting for their restricted operational window and environmental vulnerability.

3.

Disproportionate Impact on Joint-Use and HOA Facilities

The blanket per-sq.-ft. and per-buoy increases disproportionately harm multi-family homeowners' associations (HOAs) and joint-use pier arrangements. These shared structures provide access to multiple families and non-luxury property owners who pool resources to maintain shoreline access. Imposing steep per-unit increases penalizes joint-use efficiency rather than encouraging non-commercial, shared waterfront access.

4. Fee Stacking and Cumulative Regulatory Burden

Lakefront property owners are already subject to extensive regulatory oversight and recurring fees from multiple regional entities, including annual registration, environmental monitoring, and inspection fees imposed by the Tahoe Regional Planning Agency (TRPA), alongside local property taxes. Imposing drastic CSLC lease rent increases creates an unreasonable cumulative financial burden on property owners without providing any corresponding increase in state services, environmental enhancement, or infrastructure maintenance.

Request for Action

For the reasons stated above, I respectfully request that the Commission:

1. Pause the adoption of the proposed Category 1 and Category 2 benchmark rates for Lake Tahoe.
2. Re-evaluate the appraisal methodology to ensure submerged land valuations reflect actual restricted-use market realities rather than upland residential trends.
3. Incorporate seasonal usability discounts and relief mechanisms for joint-use and HOA multi-family facilities.

Thank you for your time, consideration, and commitment to fair public process.

Sincerely,

Anthony
Sloss
Tahoma,
CA

CHANGING THE FACE OF TAHOE

October 16, 2026

To whom it may concern:

I am a 78 year old grandmother who would like to tell you my Tahoe story.

I am a farmer's daughter, born in 1948 in Bakersfield . My father farmed the central valley his father, my grandfather. They grew alfalfa, cotton and sugar beets. My mother was a school teacher.

In the late 1930s my grandparents made the 11 hour trip for our summer vacation at Meeks Bay. It became a tradition. A few years later they were given the opportunity to purchase a lot on the lake . This lot became their camping site each summer. This was common for the first families up here. Water was drawn from the lake and several families built outhouses. These families who camped up there were not the mega-rich. They were common people with jobs like school teachers and farmers.

In 1948, the year I was born my grandparents built a small unassuming 1,200 square foot cabin on the lot. A few years later were able to built a pier. It was a time when common folks could afford it. It was one of the first in our bay and used by all our neighbors. Piers were considered a public benefit. At this time there were just a few cabins on Meeks Bay Avenue. Night times were dark. When I looked across the lake at night, no lights could be seen on the opposite shore.

As a child, my summer playmates were the other children on our road. If you are familiar with Carol VanEtten's books, you can read about our summer time adventures. We spent our days on the water and our evenings playing kick-the-can on Meeks Bay Avenue, a dead-end dirt road at the time.

Today, sadly, most of my childhood friends have had to sell their family cabins because they cannot afford them any longer. The taxes and fees were no longer manageable. It is like "loosing the family farm".

Now the mega-rich are buying up nearly all the lots and cabins for sale. They are tearing down beautiful old cabins and building houses to use as VRBOs It is sad to see the change. Renters most often do not care about the bear problem or the noise problems or keeping Tahoe blue. And renters certainly are not as friendly when walking down the street. Gone are the days when everyone said hello to each other.

Another change is the size of the "cabins". It is sad to see that nearly every square foot of the lot is devoted to man-made structures instead of our beautiful Tahoe forest. And to boot, most of the new owners hardly spend time up here. They build mansions and then they rent them. When I was a child I lived in neighborly neighborhood. Now I live in a neighborhood of expensive houses, many of which belong to people who do not even live here. Some do not even live in the United States

The point I am trying to make is that e**xcessive taxes along with excessive fees for piers & buoys is having a negative effect on the middle class. The middle class is being forced out because they cannot afford it and the mega-wealthy are moving in.** It is so sad.

Please carefully consider the ultimate impact on Tahoe as you entertain raising pier and buoy fees. We private citizens who follow the rules have no recourse. We are not allowed to rent our buoys. So we do not rent them. We cannot pass these costs onto customers like the public marinas are able to do. I do not think it is fair or right to adopt such an unreasonable rate increase.

Thank you,
Kathleen Stephens

From: Lee, Ninette@SLC
Sent: Monday, October 19, 2026 12:09:55 PM
To: CSLC CommissionMeetings
Cc: Lunetta, Kim@SLC; Bugsch, Brian@SLC
Subject: Fw: Proposed Benchmark Rates for Piers and Buoys (October 21, SLC Meeting)
Sensitivity: Normal

Public comment for Item 58.

Ninette Lee *(she/her)*
Land Management Division
916.574.1869

From: Ron Stephens [redacted]
Sent: Saturday, October 17, 2026 1:41 PM
To: Bugsch, Brian@SLC <Brian.Bugsch@slc.ca.gov>; Lee, Ninette@SLC <Ninette.Lee@slc.ca.gov>; slc.commissionmeetings@slc.ca.gov <slc.commissionmeetings@slc.ca.gov>
Subject: Proposed Benchmark Rates for Piers and Buoys (October 21, SLC Meeting)

You don't often get email from [redacted] Learn why this is important

Attention: This email originated from outside of SLC and should be treated with extra caution.

The California State Lands Commission's proposal to increase homeowner benchmark rates for private piers and buoys by 107% is outrageous! As citizens of the State of California a modest inflationary tax adjustment of 2% is understandable. Proposing to increase the rates by a factor of fifty times that amount comes across as arbitrary, capricious and nowhere close to what a reasonable public servant would propose.

As a retired California educator and Vietnam vet, whose extended family was fortunate enough to have a cabin at Lake Tahoe, paying the ever-increasing state taxes, fees, assessments and onerous conditions imposed by the State of California and the State Lands Commission for piers and buoys is becoming increasingly onerous. When the US Army Corps of Engineers approved our pier in 1954, the total construction cost was $1480. Currently, our annual leasing fee paid to the State of California is $2167 - a 150% increase over its original cost of construction! I find it astonishing when the annual use fee for an asset exceeds its total capital construction cost. On top of this, the State Lands Commission is proposing a 107% increase, effectively doubling the current fees for next year.

Piers and buoys were originally considered a public safety benefit to the Lake and to Lake visitors because they provided a "safe harbor" for boaters and swimmers in need. Consequently, piers did not accrue any fees for the owner. Now they are considered open game for taxation and fees with no apparent limits.

When annual tax assessments and use fees exceed the original capital costs of construction something is seriously wrong! Please bring some sanity and compassion back to state government and public service. It is time to demonstrate reasonable care towards the common citizens you serve, who pay your salaries through their property taxes, assessments and fees. We make your employment possible. Please exercise thoughtful judgement and compassion toward your constituents in your decision making.

Cordially,

Ronald D. Stephens
[redacted]
Tahoma CA [redacted]