



January 15, 2010

Matt Dickinson
USDA Forest Service, Lake Tahoe Basin Management Unit
35 College Drive
South Lake Tahoe, CA 96150

Dear Matt Dickenson,

Re: Proposed Action Description for Heavenly Mountain Resort's 2010 Capital Projects

The League to Save Lake Tahoe appreciates the opportunity to provide comments on Heavenly Mountain Resort's 2010 Capital Projects. Potential impacts to soil, vegetation, and water quality along with coverage discrepancies are addressed, so that impacts may be avoided or properly mitigated.

Relocation of the Umbrella Bar

Coverage & Land Capability

The Proposed Action Description states that the Umbrella Bar will be relocated from the top of the Gondola to Snow Beach, next to Patsy's Hut. The Heavenly Mountain Resort Master Plan Amendment shows the allowable coverage for the area where the current Umbrella Bar is, as having a moderate erosion hazard (land capability class 4/7, 20% allowable coverage), but the area that coverage will be relocated to is considered to have a high erosion hazard (land capability class 1a, 1% allowable coverage) and appears to be located adjacent to Heavenly Valley Creek (Heavenly Master Plan Amendment Soil Classification Map 3.4-1 and Table 3.4-1 pages 3.4-2 to 3.4-5). It is important that when land coverage is transferred, it is completely restored and that restored state is maintained. It is also necessary to consider soil classification when transferring land coverage. In the case of transferring the Umbrella Bar and its coverage, an equal amount of coverage can only be used in areas having equal soil classification. Although the approved Master Plan allocated 2,274 square feet of coverage for Snow Beach, it is unclear from the proposed Action Description and accompanying maps what the total land coverage at Snow Beach is being proposed to be once the Umbrella Bar is moved.

Gondola Lodge

Discrepancies in Coverage

The Heavenly Master Plan Amendment 2005 allows 10,450 square feet coverage for the Gondola Lodge (Appendix 2-A, page 1). The Proposed Action Description states that the Gondola Lodge will cover 14,750 square feet plus an additional 4,320 square foot patio, totaling 19,070 square feet. 4,250 square

feet of coverage is being proposed to be re-allocated from the Sand Dunes Lodge. The Heavenly Mountain Resort Master Plan Amendment states that the Sand Dunes Lodge is located outside of the basin, so how is Heavenly allowed to transfer this coverage from outside the basin (page 3.4-19 and Land Coverage Table, Appendix 2-A)? From the total proposed coverage of 19,070 square feet, once the 4,250 square feet from the Sand Dunes lodge is subtracted (14,820 square feet left), there is still an additional 4,370 square feet proposed for the Gondola Lodge beyond the 10,450 square feet that has been approved through the Master Plan. Beyond this, where is the source for the additional 4,370 square feet needed for this project?

Water Quality Impacts

The Proposed Action Description states that the lodge is being proposed to be located slightly southwest of the original location approved in the Master Plan Amendment. The proposed Action Description states that soil will be removed from a slope to construct the Gondola Lodge, moving the soil to level the area in front of Tamarack Express. Would this grading be necessary if the originally approved site was used? Since new soil will cover existing vegetation, will this area be re-vegetated?

California Trail Obstacle Reduction

Impacts to Water Quality

Implementation of the Easy Street Run Hazard Reduction (ESRHR) as outlined by the 2007 Easy Street Run Hazard Reduction Monitoring Report may be improved before applying the prescription to California Trail. Since the ESRHR demonstration project was conducted, additional water quality monitoring and research have produced conclusions that can provide important adaptive management techniques. Some of this information has been outlined in the Heavenly Mountain Resort Restoration and Monitoring 2008 Summary Report within the Heavenly Mountain Resort Mitigation and Monitoring Plan Annual Report (October 2007 – October 2008).

The ESRHR monitoring report notes the need for further research and monitoring of the ESRHR prescription applied to steeper slopes, the need for a Seasonal Runoff Evaluation, storm monitoring and long term monitoring. Much of the determinations about erosion and runoff came from visual assessments through “photo point monitoring,” which examined the percentage of area covered with debris, organic matter, vegetation and rock. It might prove worthwhile to examine runoff produced by irrigating vegetation, if runoff exists between the soil and debris layers and if runoff is channeled by debris.

Since the ESRHR monitoring report was released in 2007, additional scientific information about the likely increase in frequency of rain, rain-on-snow events and 100-year storms has become available. At the time of the ESRHR, WEPP simulations showed that erosion was mainly caused by snowmelt instead of rainfall and included 30-year and 20-year, one-hour storm simulations. Conclusions taken from additional monitoring and modeling taking into account greater storm intensity could be included in adaptive management methods.

Impacts to Vegetation

The reduction of obstacles on California Trail may impact the sensitive plant, *Draba asterophora* v. *asterophora*. The Heavenly Mountain Resort Master Plan Amendment 2005 dated January 27, 2007

notes that the plants “may be vulnerable to any activity resulting in long-term habitat disturbance.” Even with 100 foot buffer zones, hazard reduction on California Trail may result in long-term habitat disturbance. The Heavenly Mountain Resort Master Plan Amendment 2005 also mentions that California Trail is located within the headwaters of Heavenly Valley Creek (page 3.8-38), consequently, care should be taken not to damage riparian or sensitive plants in this area.

If you have any questions, please contact the undersigned.

Sincerely,

Melissa Thaw
Associate Program Advocate
League to Save Lake Tahoe