



Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449

June 24, 2008

Dear Madam Chair and Members of the Governing Board,

Thank you for the opportunity to comment on the TRPA's Five Year Strategic Plan.

The League to Save Lake Tahoe is concerned that the newest Five-Year Strategic Plan does not place enough emphasis on the environmental thresholds. Achieving threshold attainment is the primary objective of the TRPA and that should be reflected in the Five-Year Strategic Plan's goals and objectives. The League has a number of recommendations regarding revisions to the Strategic Plan that will refocus the document on achieving and maintaining environmental thresholds and bring the plan into greater alignment with the mandates of the Compact.

Goals

Out of the four goals, Goals 1 and 3 and a number of their respective work objectives address the environmental thresholds, but the importance of achieving these thresholds is understated. The League recommends threshold attainment should be a stand alone goal with the first work objectives focusing on achieving carrying capacity standards, improving monitoring, increasing the frequency of evaluation, and meeting interim target goals. Consistent with this goal, the TRPA could then follow with supplementary objectives related to the Regional Plan, Shorezone Plan, EIP, BMP retrofit, etc. It is imperative that the goal addressing threshold attainment is listed as the first goal to signify its value within the Strategic Plan. Below is a suggested version of a Goal and respective Work Objectives to properly address environmental thresholds.

Goal 1: To make positive progress in achieving and maintaining attainment for all environmental thresholds

Work Objectives

1. Adopt updated environmental threshold carrying capacities that provide for at least equal or better protection than current thresholds.

2. Continue to work with the Tahoe Science Consortium to develop a Lake Tahoe research plan, including a robust monitoring and adaptive management system.
3. Continue to evaluate threshold attainment on a more frequent basis.
4. Create a strong compliance program with increased inspections and monitoring.
5. Set and achieve at least bi-annual interim yearly target goals for progressing towards threshold attainment, such as reducing fine sediment, carbon monoxide, and ozone; improving lake clarity; restoring more disturbed SEZ's; achieving prime fish habitat restoration; etc...
6. Facilitate implementation of the Basin-wide forest fuels plan.
7. Increase efforts and efficiency of EIP projects through better review and scheduling.
8. Expand BMP Retrofit Program.
9. Establish a **successful** Aquatic Invasive Species Prevention Program.
10. Establish an **effective** Blue Boating Program that actually substantially reduces boat pollution consistent with the non-degradation standard with the Outstanding National Resource Waters (ONRW) designation.
11. Adopt and “enforce a regional plan and implementing ordinances which will achieve and maintain such capacities while providing opportunities for orderly growth and development consistent with such capacities.”

The addition of other Goals and work objectives need to be complimentary to the achievement of environmental thresholds.

Summary

The newest version of the Five-Year Strategic Plan lacks emphasis on the achievement and maintenance of the environmental threshold as the primary goal. The League to Save Lake Tahoe recommends a restructuring and rewording of the document to shift the focus back towards the importance of the thresholds as outlined in the TRPA Compact.

Thank you for the opportunity to comment on the latest addition of the Five-Year Strategic Plan. Please do not hesitate to contact the League to Save Lake Tahoe with comments or questions.

Sincerely,

Nicole Gergans
Program Advocate
League to Save Lake Tahoe