



October 7, 2008

Victor Lyon
Interdisciplinary Team Leader
Lake Tahoe Basin Management Unit
35 College Dr. South Lake Tahoe, CA 96150

RE: Comments on the Aspen Community Restoration Project

Dear Mr. Lyon,

The League to Save Lake Tahoe strongly supports the general goals and objectives of the Aspen Community Restoration Project. We view the restoration of SEZs as a matter of enormous importance to the health of Lake Tahoe, and the restoration of Aspen stands as a crucial component of such restoration. We would like to express the strongest support for this effort.

We do, however, have some concerns regarding the approach of this Project. Specifically, we believe that a comprehensive approach to SEZ restoration is far superior to a piecemeal approach. Any part of this Aspen restoration project that will occur within a degraded riparian ecosystem should include a program to return the entire SEZ to full function. The project should also take advantage of any other opportunities presented to advance the attainment of thresholds and other goals (e.g. wildlife and fisheries goals) According to the LTBMU Land and Resource Management Plan “the Forest Service is directed to cooperate with the TRPA....and programs and projects proposed by the Forest Service will be reviewed against [TRPA thresholds].”

Additional concerns, suggestions, and questions regarding specific components of the project are as follows:

- 1) The document states that “trees larger than 30 inches dbh would be removed only as necessary to achieve stand restoration.” The document needs to detail the specifics of the process as to how a decision will be made to fell these large trees.

- 2) The use of mechanical root separation should be limited and hand separation should be utilized to the greatest extent possible.
- 3) Alternatives to pile burning should be utilized where feasible.
- 4) It is imperative that mountain bikers are restricted from temporary roads during operations and after they are decommissioned in order to minimize erosion. The proposed plan only shows concerns with areas adjacent to these temporary roads and not to the roads themselves.
- 5) What will the verification of site-suitability for mechanical equipment entail?
- 6) It is stated that “less than one mile (total) of temporary roads may be constructed; these will be decommissioned.” Please clarify whether “less than one mile” refers to the amount of road that will be built for the entire 1145 acres or whether it refers to the amount of road that will be built for each separate treatment area.
- 7) It is of concern that roads will be built over SEZ crossings.
- 8) It is of concern that “road features such as culverts or bridges to facilitate the free flow of perennial and seasonal drainages and ditches” will only be designed for a 3-year run-off event.
- 9) How will the feasibility of retaining trees larger than 30 inches dbh exhibiting old tree characteristics be determined?
- 10) Mechanized thinning in SEZs should only be allowed if it is a part of a demonstration project or pilot study. There have been very few demonstration projects conducted on this topic and more research needs to continue in this area before allowing for practice on a broad basis.

Thank you for the opportunity to comment on the Aspen Community Restoration Project proposal. Please do not hesitate to contact the League to Save Lake Tahoe with comments or questions.

Sincerely,

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