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Comments: Jeff Marsolais:

Thank you for the opportunity to comment on the USDA FS Incline Management Plan. Tahoe Regional Planning Agency (TRPA) staff reviewed the plan and wishes to submit the following comments:

General Comments

* General understanding is that the primary planning action would be to shift land management from "general conservation" designation to "backcountry management area. " Potential impacts based on pgs 80-82:

* Allow greater use of managed wildfire.

* Prevent the development of "Developed Recreation Sites", "Organization Camps", "Recreation Residences", "Ski Areas", "Administrative Facilities", "Motorized Cross- country Travel", "Communication Sites", and "Urban Stormwater Treatment".

* Greater restrictions on "Ski Slope/Trail", "Roads", "Transportation Related", "Utilities", and "Community Use and Public Information".

* Shift in land management strategy that restricts activities that may degrade the environment would be beneficial.

* Located in the Third Creek Watershed.

* Rural Scenic Corridor Hwy 431 (#23) runs through the project area; this corridor is in attainment.

* No known historic or cultural resources.

* Proposed action appears to be in line with applicable TRPA Goals & Policies, Regional Plan, and plan area statements.

* PAS Incline Lake (#053)

* Land Use Classification: Recreation

* Management Strategy: Mitigation

* Planning Statement: This area should continue to provide opportunities for both dispersed forms of winter and summer recreation. Private developed facilities, including summer homes, may be permitted pursuant to a master plan for the area which fully addresses the planning considerations below and all environmental impacts.

* PAS Incline Lake also includes planning consideration, policies, and permissible uses.

* PAS Mount Rose (#030)

* Land Use Classification: Conservation

* Management Strategy: Mitigation

* Planning Statement: This planning area should remain undeveloped to the extent that its natural features and qualities are protected. Resource management should be low level with maximum emphasis on providing opportunities for dispersed recreation.

* PAS Mount Rose also includes planning consideration, policies, and permissible uses.

* It is unclear why some proposed actions are labeled on figure 2, (e.g. "Adopt approximately 5 miles of existing non-motorized trails") while others are not (e.g. "Reroute existing non- motorized trails [hellip]within sensitive areas throughout the project area.")

* Page numbers would be useful.

Vegetation

- * Greater use of managed wildfire is likely to be beneficial for both vegetation and wildlife.
- * Vegetation Management - Performance Measures (pg.9), 2nd bullet: Add "meet all Forest Plan guidelines and TRPA requirements for[hellip]".

Water Quality

- * Precluding the development of "Urban Stormwater Treatment" infrastructure, could potentially have negative impact; however, it is unclear from the plan if urban stormwater treatment would be appropriate for the site and proposed infrastructure.
- * For the specific management actions identified, almost all appear to have beneficial impacts on water quality.
- * Possible exception: "Construct a new non-motorized trail to create a universally accessible loop in the former lake bed area." (pg7) New trail development within a stream environment zone (SEZ) could have water quality impacts.
- * Need to address permanent BMPs and year-round management (including snow removal) for existing parking areas referenced in the desired condition section (pg.5). The plan includes increasing access and connections to the parking areas both in summer and winter, but it is unclear if these are proposed actions. If parking areas are already paved and have maintained BMPs, include a statement of current conditions in background section.
- * Roads and Trails - Actions (pg 6), 5th bullet: change BMP "direction" to BMP "requirements".
- * Roads and Trails - Performance Measures (pg 7), 3rd bullet:
- * Add "Temporary and permanent BMPs are consistent with[hellip]".
- * Include more specifics, state TRPA standards include Section 60.4 of TRPA Code and consistency with TRPA's Best Management Practices Handbook.
- * Hydrology and Habitat Restoration Activities - Performance Measures (pg.8), 5th bullet: Add "[hellip]current Best Management Practices (BMPs) requirements for design and construction of restoration activities."
- * Assumptions (last pg), 3rd bullet: Change "to current Forest Service guidance and TRPA requirements for BMPs[hellip]".

Recreation

- * Relevant TRPA Thresholds for Recreation:
- * [hellip]to preserve and enhance high quality recreation experience and to provide[hellip]dispersed recreational uses". Recreation should be managed to "ensure equilibrium between the region's natural endowment and its manmade environment".
- * Supportive of FS adopting and improving existing trails with limited development of new trails in non-sensitive areas. This will disperse recreation use in popular areas and reduce impacts to resources and the visitor experience (crowding).
- * Formal designation of trails will help keep user in appropriate areas. Should consider trailheads and trailhead signage, connections to trails at Tahoe Meadows.
- * Plan should consider winter access points and flexibility in allowing parking in shoulder season (early winter, late spring) in anticipation of climate change trends and reduced snowpack. (This is currently being analyzed in LTBMU Winter Travel Management Project.)
- * Consider coordination for shuttles to trailheads (any plans for this?) and to Incline Village shuttles if this is anticipated to increase use.
- * Consider potential user conflicts on trails- mountain bikers, horses? hikers and how to manage. Coordinate with TAMBA for education and support in trail development.
- * Consider using surveys and public forums to gain input on the use of the trails and access needs and to gain understanding of current user groups. Interesting to see results of five year 2015 USFS Survey. Are results

available yet?

* Consider links to Incline and Stateline to Stateline bike trail project.

If you have any questions, please contact me at 775-589-5261 or jself@trpa.org.

Thank you,

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Long Range and Transportation Division