



March 1, 2012

Via E-mail

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
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Re: Proposed Approval of an Amendment to the Water Quality Control Plan for the Lahontan Region to replace the Pesticide Prohibition Water Quality Objective with a Regionwide Waste Discharge Prohibition with Exemption Criteria

Dear Members of the State Water Resources Control Board

These comments are submitted on behalf of the League to Save Lake Tahoe (“League”). As referenced in our comment letters throughout the entire process, the League continues to remain concerned with the detrimental, cumulative, and long-term impacts associated with pesticide use in water. There are also associated issues with the storage, accidental discharge, and toxicity of these aquatic pesticides. “The current pesticide water quality objective essentially prohibits pesticide application to water by requiring the pesticide concentration to not exceed the lowest detectable levels.” The current standards need to be maintained to protect water quality and protect human health. Lake Tahoe has special designation as an Outstanding National Resource Waters (ONRW), which affords the Lake a strict non-degradation standard, thereby necessitating restrictions on any aquatic pesticide use specific to Lake Tahoe.

The League has been a strong advocate for protecting the Lake from the introduction of aquatic invasive species (AIS), which have the potential for irreversible impacts to the Lake’s ecosystem and physical environment. For the control of AIS that have already established themselves in the Lake, such as Asian clam, Eurasian milfoil, and curly leaf pondweed, bottom barriers and similar mechanical methods need to be employed. For invasive warm water fish species like large-mouth bass and blue gill, electro-shock is a method that can be used without pesticide application.

The concerns with and effectiveness of the use of aquatic pesticides and their impacts on humans and aquatic species are summarized below. There is significant concern that aquatic pesticide application will infiltrate water intakes, which furnish thousands of residents at Lake

Tahoe with their drinking water. In addition, many drinking water wells are located in extremely close proximity to the lagoons currently planned for intensive treatment, such as the Tahoe Keys area with thousands of citizens potentially affected. Drinking water contamination is a human health concern that can be costly to mitigate, especially if the populace is adversely affected. What protocol is established that provides ample and proper notification with a comment period to all residents that can be affected from exposure or any other form of contamination?

With respect to the significant impacts associated with pesticide use, conflicts with the current water quality objective, Lake Tahoe's designation as an ONRW, and alternatives that exist that do not require pesticide application, the Lake Tahoe Basin needs to be excluded from this amendment, with the following exemptions:

- In the emergency instance of the first introduction of a destructive aquatic invasive species, such as quagga or zebra mussels, Eurasian ruffe, and Golden mussel, within a water body in the Lake Tahoe Basin, pesticides may be considered, if eradication is probable. This needs to be limited to extraordinary cases.
- In order to directly safeguard human health and safety, the vector control of mosquitoes should be maintained, with pesticides allowed, if necessary. Aerial spraying should be avoided to prevent atmospheric or indirect introduction to enter Lake Tahoe. A study done by CDFG, UC Santa Cruz, Monterey Bay Aquarium Research Institute, Moss Landing concerning aerial spraying of pesticides in the Monterey Bay area found that it killed shorebirds and other wildlife. The news story is summarized here: <http://www.indybay.org/newsitems/2009/02/27/18573758.php>
- If aquatic pesticide is to be even considered for Lake Tahoe, only types that do not affect human health in any manner should be considered. In addition, methods should be employed that increase contact time and decrease spread, such as bottom barriers, booms, curtains, and other efficient means.

Thank you for this opportunity to provide further comments on the proposed amendment.

The League hereby incorporates the comments from the Tahoe Water Suppliers Association and Dorie Hession.

Sincerely,

Carl Young
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