



Dear Jeanine Townsend, Clerk to the State Water Board

Subject: Comment Letter-Pesticide Prohibition Basin Plan Amendment

As a resident of Lake Tahoe [or “a resident of Tahoe Keys Property Owners Association”], we commend the Lahontan Water Control Board and Lahontan Staff for their vision and perseverance in recently passing the amendment allowing exemptions to the prohibition of aquatic herbicides in Lake Tahoe. We now trust that the State Water Board will pass this important amendment. Non-chemical methods (harvesting, matts, and hand picking of aquatic weeds) of controlling invasive aquatic weeds have not worked in Lake Tahoe. In fact, the problem is getting worse.

We support the Lahontan Staff for their well-research recommendation to the Lahontan Water Control Board proposing exemptions to the prohibition of aquatic herbicides in Lake Tahoe. We now trust that the State Water Board will pass this important amendment before invasive species are not controllable.

As a resident of South Lake Tahoe, I treasure the pure water and pristine environment of Lake Tahoe, and see myself as one of the current stewards of this national resource. While I may not agree on many local, regional, and national issues, I am convinced that the careful and limited use of herbicides to control invasive aquatic weeds in the Tahoe Keys is not only prudent, but vital and essential at this important point in history. If the spread of invasive and nuisance weed species is to be controlled and reversed, it must be done now, while weed populations are still limited and controllable.

The homeowner association that I belong to (Tahoe Keys) has invested vast resources towards controlling weeds in the Keys by the use of weed harvesters. A full summer crew is employed to operate 4 large mechanical weed harvesters which run 8 hours a day and 6 days a week. We can only remove weeds to a depth of 5-feet. After harvesting, the majority of weeds remain to adversely impact beneficial uses, degrade water quality by increasing water temperature, recycling nutrients, providing habitat for non-native warm water fish, and impacting the safety of water contact recreation. Because of these known adverse impacts, it is in the best interest of the State Water Board to preserve and improve water quality by allowing the careful, controlled use of all proven methods to control aquatic weeds.

As a resident of Tahoe Keys Property Owners Association, I can attest first hand that current methods of controlling invasive aquatic weed species are successful only in

maintaining open channels for navigation. These methods, however, do not control invasive weed infestations and migration. As harvesters of aquatic weeds at a scope unmatched anywhere in Lake Tahoe, Tahoe Keys can attest to the limitations of mechanical harvesting and other non-chemical methods such as matt laying and hand harvesting. The problem of invasive species is getting worse. It can still be controlled. It can still be eradicated. But we must be granted the tools to do so now.

Extensive research was conducted this past summer in the Keys. The project was undertaken in cooperation with TRPA and the Lahontan Water Board, and will be continued in the summer of 2012. The study included what are called "dye studies" to map the degree to which herbicides, if applied, would be contained in the Keys. These empirical studies have demonstrated that the controlled application of herbicides in the Keys will remain in the Keys and not impact surface water intakes in other areas of Lake Tahoe. The remoteness of the Keys to the intakes areas and the rapid dispersal of low herbicide concentrations used will assure compliance to the highest standards. Please pass this important amendment.

We have heard from concerned and caring citizens that the eradication of invasive weeds is not possible, and that, because it is not possible, the careful use of chemical methods should not be allowed. We strongly disagree with this contention of surrender and abandonment. Eradication is possible! But, more importantly, even if absolute eradication was not possible, this should not prohibit the use of this vital and proven tool against the problem. Whether herbicides would or would not completely eradicate the problem, they have been proven time and time again to be the best method for the control of invasive aquatic weeds.

Please allow us to employ every reasonable and proven tool available to control the spread of invasive species in Lake Tahoe, and do so while the eradication of these species is still a viable goal.

We thank the State Water Board for their effort and courage in passing this amendment.

Sincerely,

Peter KULKA