



Dear Jeanine Townsend, Clerk to the State Water Board:

As a resident of Tahoe Keys and a member of the Tahoe Keys Property Owners Association, I sincerely appreciate the vision and perseverance of the Lahontan Water Control Board and Lahontan Staff in recently passing the amendment allowing exemptions to the prohibition of aquatic herbicides in Lake Tahoe. As the next step moving forward in this process, I trust that the State Water Board pass this important amendment in a timely matter so that the existing problem will not escalate to the point that invasive species in Lake Tahoe become uncontrollable.

The Tahoe Keys homeowner's association has already invested significant resources toward controlling weeds in the Keys through the use of weed harvesters. A full summer crew is employed to operate four large mechanical weed harvesters which operate eight hours a day, six days a week. However, this harvesting technique only removes weeds to a depth of five feet, leaving the majority of weeds in place to 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. As harvesters of aquatic weeds at a scope unmatched anywhere in Lake Tahoe, Tahoe Keys can attest to the fact that the current non-chemical methods employed (mechanical harvesting, matt laying and hand harvesting) have been successful only in maintaining open channels for navigation, but not controlling the spread of invasive aquatic weeds.

On a more positive note, extensive research was conducted this past summer in the Keys (with plans to continue in the summer of 2012) that included "dye studies" to carefully map and empirically demonstrate the spread of a controlled application of herbicides within the Keys. The results of this research to date show that the careful application of these herbicides would allow them to remain contained within the Keys and not impact surface water intakes in other areas of Lake Tahoe due to the remoteness of the Keys with respect to the intake areas as well as the rapid dispersal of low herbicide concentrations.

I am a registered Civil Engineer in the State of California, and received both the Bachelor of Science and Master of Engineering Degrees in Civil and Environmental Engineering from Cornell University. I have always been interested in water quality, and have read several research papers on the Eurasian watermilfoil problem in Lake Tahoe from UC Davis, the University of Nevada, Reno, and the USGS. I am convinced that the careful and limited use of herbicides to control invasive aquatic weeds in the Tahoe Keys is without doubt the intelligent next step to be taken toward preserving the historical significance and scenic beauty of Lake Tahoe. Eradication via the controlled application of herbicides is a proven and effective tool against invasive aquatic weeds, given that steps are initiated while weed populations are still limited and controllable.

I want to take this opportunity to thank the State Water Board for the efforts they have taken toward passing this amendment. While the eradication of these species is still a viable goal, please support the expeditious but guarded use of herbicides to control the spread of invasive species in Lake Tahoe.

Sincerely,

Robert D. Toaz, Jr., Tahoe Keys homeowner and State of California Professional Civil Engineer