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Public Comment
Pesticide Prohibition BPA
Deadline: 3/1/12 by 12:00 PM

To: State Water Resources Control Board, California

Attn: Jeanine Townsend
Clerk to the State Water Board



Re: Public Comments, Lahontan Region Basin Plan Amendment

Dear Board Members,

This letter concerns your upcoming decision regarding the proposal to amend the Water Quality Control Plan for the Lahontan Region.

My specific comments relate to that portion of the proposed plan amendment dealing with the issuance of discharge permits and exemption criteria for use of aquatic herbicides within the waters of Lake Tahoe.

I support State Board approval of the Lahontan Region Plan Amendment regarding use of aquatic herbicides to control and eradicate invasive weed species from specific areas of Lake Tahoe.

I am a full-time resident of the City of South Lake Tahoe, residing in the Tahoe Keys. I am also a member of the Tahoe Keys Property Owners Association (TKPOA). I was appointed by the Board of Directors to the TKPOA Water Quality Committee, representing TKPOA in meetings with the Tahoe Regional Planning Agency, research scientists for UC Davis and the University of Nevada Reno, Tahoe Resources Conservation District, US Fish & Wildlife Service, and representatives of several Tahoe Basin interest groups. Our objective was to craft a multi-agency test project designed to evaluate several methods of control of aquatic invasive species, at least four of which are present in the Tahoe Keys.

Comments:

- 1) TKPOA currently performs mechanical removal (trimming) of aquatic weeds, including at least two "invasives", *Eurasian milfoil* and *Curly-leaf pondweed*. The current effort only succeeds in keeping the channels open for navigation. Trimming the weeds does not kill these plants.

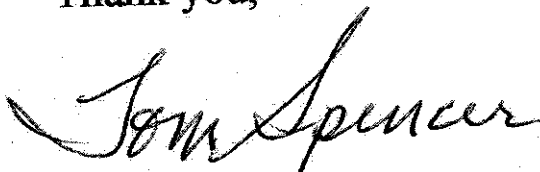
- 2) The dense growth of *Eurasian milfoil* and *Curly-leaf pondweed* provide perfect habitat for at least two additional invasive fish species, *Black Bass* and *Bluegill*. Both of these fish are voracious predators of native fish species like *Lahontan Cutthroat Trout* (LCT). Several agencies are cooperating in the effort to restore a viable LCT population in Lake Tahoe.
- 3) Many members of TKPOA, like me, are encouraged that there may be hope for eradicating the milfoil, pondweed, bass and bluegill from the Tahoe Keys and other marinas on the lake. But this is an extremely costly undertaking, and not likely to happen using mechanical methods (hand-pulling and bottom barriers) which will cost many thousands of dollars per acre.
- 4) Mechanical removal of weeds in a marina setting like the Tahoe Keys is likely to be unsuccessful due to another issue - the physical presence of hundreds of structures like dock footings, pilings, bulkheads, and rock revetments. All of these physical accoutrements provide protected areas (nooks & cavities) where plants remain, and from where they repopulate.
- 5) Use of specifically approved aquatic herbicides holds the promise of being able to treat invasive weed growth economically and with a significantly higher success rate. The herbicide can reach all of these small protected pockets of weeds and kill the plant to its root system. Yes, it may be possible to eradicate these weeds from the marinas, or at least keep the population controlled to the point where it poses no risk to the greater open lake area.
- 6) Some local residents and representatives of water purveyors have expressed concern that putting aquatic herbicides into these waters will affect domestic water supplies. As a member of the multi-agency group working on the problem of invasive species, I can say that no one wants to risk negatively affecting our pristine waters of Lake Tahoe. No one I know would ever suggest using a substance that creates that risk.
- 7) Marinas and channels like those in the Tahoe Keys offer the physical opportunity to isolate the treatment areas from the open areas of Lake Tahoe, allowing time for herbicides to breakdown to an inert state. It

is my understanding from the testing conducted thus far (dye-tests), that the surrogate did not travel more than a few yards from the application points. None was detected outside the channel entries to Tahoe Keys. Therefore it is not likely that any herbicide would leave the treatment areas.

Final thoughts for the State Water Board:

- a) Opponents to use of herbicides want a 5 year moratorium to be imposed. Waiting five more years to attack the invasive species in Lake Tahoe may put the problem out of reach of cost-effective control, as the populations spread from the marinas to more open lake areas.
- b) Effective treatment strategies require economic feasibility. If a treatment isn't cost effective, it won't be used, and the "invasives" will continue to spread. Right now there is little federal or state funding available for these efforts. It will take all of the entities cooperating, including private sector contributors like TKPOA, to fund the work. Please don't doom this effort by denying the use of affordable treatments with safe herbicides.
- c) The State Water Board recognizes the current threat posed by the invasive plant and fish species in the marinas at Lake Tahoe. We hope you will allow permit applications for aquatic herbicides that have been used safely in thousands of fresh water bodies throughout North America. Best Management Practices can be employed here at Lake Tahoe to control invasive weed problems - Approve the proposed Lahontan Plan Amendment.

Thank you,



Tom Spencer

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