



April 13, 2011

Via E-mail

Mary Wagner & Daniel Sussman
Lahontan Water Board
2501 Lake Tahoe Blvd., South Lake Tahoe, CA 96150
mfwagner@waterboards.ca.gov & dsussman@waterboards.ca.gov

Re: Proposed Amendments to the Water Quality Control Plan for the Lahontan Region:
Pesticide Prohibition with exemption Criteria

Dear Ms. Wagner, Mr. Sussman, and Members of the Lahontan Water Board,

These comments are submitted on behalf of the League to Save Lake Tahoe (“League”). As referenced in our comment letter dated August 31, 2009, the League continues to remain concerned with the detrimental, cumulative, and long-term impacts associated with pesticide use in water. “The current pesticide water quality objective essentially prohibits pesticide application to water by requiring the pesticide concentration to not exceed the lowest detectable levels.” Lake Tahoe has special designation as an Outstanding National Resource Waters (ONRW), which affords the Lake a strict non-degradation standard.

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. Realistically, these well-established invasive species cannot be eradicated, but only controlled at this point.

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:

1. In the emergency instance of the first introduction of the destructive quagga or zebra mussels within a water body in the Lake Tahoe Basin, pesticides may be considered, if eradication is probable. This needs to be limited by declaration of the California Governor.

Mary Wagner & Daniel Sussman, Lahontan Water Board
League to Save Lake Tahoe Comment Letter –Proposed Amendments for the Lahontan Region:
Pesticide Prohibition with Exemption Criteria
Page 2 of 2
April 13, 2011

2. In order to directly safeguard human health and safety, the vector control of mosquitoes should be maintained, with pesticides allowed, if necessary.

Thank you for this opportunity to provide further comments on the proposed amendments to the water quality control plan for the Lahontan region: pesticide prohibition with exemption criteria.

Sincerely,

Carl Young
Program Director
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