



February 20, 2012

Fax to: 916-341-5620

TO: Jeanine Townsend, Clerk to the State Water Board

SUBJ: "Comment Letter – Pesticide Prohibition Basin Plan Amendment

Note: Deadline Letter, Fax, e-mail by March 1, 2012,
12:00 noon. Public Comment

Dear Jeanine,

I have been a full-time resident of Tahoe Keys Property Owner's Association since 1988, and am currently serving on the TKPOA Board of Directors (since 2008).

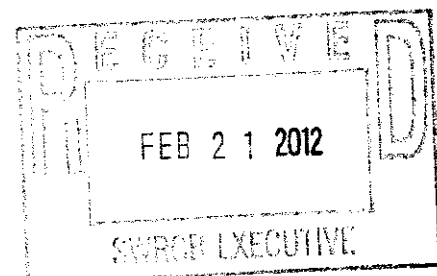
The Lahontan Water Control Board Staff recently passed an amendment allowing exemptions to the prohibition of aquatic herbicides in Lake Tahoe.

Representing the TKPOA approximately 1530 homeowners, I have spoken to a number of them. Many feel that the invasive aquatic weed species need to be controlled, and that the channels are being maintained with our weed harvesters.

My concern, as a representative of our homeowners, is the Lahontan response to comments letter November 23, 2011 (copy enclosed). **Quote from Lahontan:**
"There is a chance that the use of pesticides may effect the water quality of the Tahoe Keys wells."

Our Tahoe Keys water is and has been an asset and treasure to our Association, and of utmost importance to the individual homeowners who spoke to me on this subject. I support and thank the State Water Board for their expertise on this decision.

Sincerely,
Bobbie Canepa
Bobbie Canepa (Board Director, TKPOA)
Advisor for St. Moritz Subdivision
e-mail: bobbiestmoritz@aol.com



Comments

LAHOVIA Response

November 14, 2011

California Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150

Re: Public Comment - Proposed Amendments to the Water Quality Control Plan for the Lahontan Region to Allow Pesticide Use in Lake Tahoe

As a resident and homeowner in Tahoe Keys, and direct stakeholder who would be affected by proposed amendments referenced above, like many homeowners in the area I have concerns about the health effects of such pesticide and herbicide use in Lake Tahoe and its adjoining waters.

My concerns include the close and immediately adjoining proximity to the Tahoe Keys water Higgins of the three Tahoe Keys water wells that provide potable water to the 1,500+ homes and businesses served by these wells and the possible effects that the introduction of herbicides or pesticides in these Higgins might have on these wells, located in a downward trajectory of the Higgins to be treated with these chemicals. Is there any chance of proposed herbicides so used affecting the water quality of these water wells?

Another concern is the health of swimmers, boaters, paddleboarders, children, pets, and others using the Tahoe Keys Higgins for daily water recreation, including myself, family, guests, and pets. Are the pesticides proposed 100% safe for such contact and occasional ingestion?

It is reasonable to ask that use of pesticides, herbicides, and other chemical treatments in Lake Tahoe and its adjoining waters be approved only upon study and certification by an unrelated, third-party, unbiased, disinterested, arms-length, certified lab that attests with no uncertainty that uses of such chemicals are 100% safe for human, animal, and wildlife contact and ingestion. Some households at Lake Tahoe receive their drinking water directly and untreated from the lake's shorelines. Lake Tahoe's status as an Outstanding National Resource justifies the need for extraordinary care, caution, and protection. It is reasonable to expect that a full Environmental Impact Study examining all aspects of this amendment change is in order, before such proposed amendments are enacted.

Sincerely,

B.J. Hodge
402 Wedeln Ct.
South Lake Tahoe, CA 96150

BJH R1: There is a chance that the use of pesticides may affect the water quality of the Tahoe Keys wells. It is speculative to specify the chance, given the range of factors of influence associated with an individual project. A non-exhaustive list of these factors includes pesticide properties, ambient conditions, substrate, well depth, proximity, and pump rate. Project proponents are required to provide information on the pesticide proposed for use, including the chemical composition, fate and transport, and risks to water supplies. Proponents are also required to include water suppliers in their public notification plans, including any water use restrictions or precautions. Proponents will provide potable drinking water where necessary.

BJH R2: It would be speculative to assert that the pesticides proposed are 100% safe for such contact, as the proposed amendment to the Basin Plan does not specify what pesticides may be used. Rather, it requires that project proponents disclose information to the Water Board, in accordance with the required criteria specified in Attachment 2 of the SED. The Water Board then retains discretion to approve or deny exemption requests. If approved, project proponents must provide notification to all potentially affected parties using the water for any beneficial use, including contact and non-contact recreation. Proponents must also follow a monitoring plan and mitigation plan to assure safe compliance with permit requirements, protect the public, and address potential impacts.

