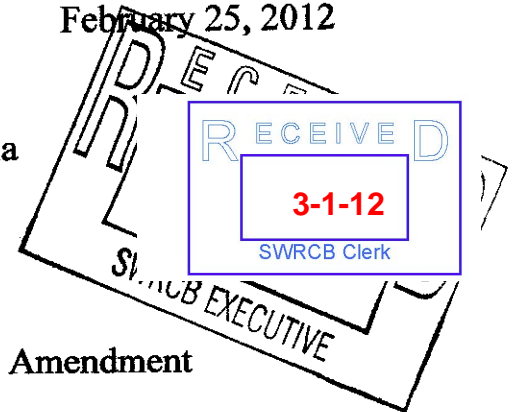


February 25, 2012

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.

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 on the Board of Directors for the Tahoe Keys Property Owners Association (TKPOA). I was also appointed by the Board of Directors to the TKPOA Water Resources 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 two invasive aquatic weed species, *Eurasian milfoil* and *Curly-leaf pondweed*. The current effort only succeeds in keeping the channels open for navigation. Trimming the weeds is just that; Trimming does not remove the plants.

- 2) 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.
- 3) Use of specifically approved aquatic herbicides holds the promise of our being able to treat invasive weed growth economically and with a significantly higher success rate. The herbicide can reach small protected pockets of weeds and kill the plant to its root system.
- 4) 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.
- 5) Marinas and lagoons 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 didn't travel more than a few yards from the application point. None were detected outside the channel entries to the Tahoe Keys.

Final thoughts for the State Water Board:

- a) Opponents to use of herbicides want a 5 year moratorium to be imposed on their use. 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 us the ability

to eradicate the "invasives" through 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 give us the ability to eradicate the "invasives" - Approve the proposed Lahontan Plan Amendment.

Thank you,

A handwritten signature in black ink, appearing to read 'Mark Koffman', written in a cursive style.

**Mark Koffman**

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South Lake Tahoe, CA 96150