

August 27, 2020



## Keep Toxic Herbicides Out of Lake Tahoe, Protect Treasured Ecosystem

We don't need to use toxic weed killers to manage unwanted vegetation in Lake Tahoe, given the havoc they will wreak on a treasured and sacred ecosystem. The Tahoe Regional Planning Agency and Lahontan Regional Water Quality Control Board (TRPA/LRWQCB) are accepting comments on a draft environmental impact report/ environmental impact statement ([EIR/EIS](#)) analyzing environmental impacts of a proposed Tahoe Keys Lagoons Aquatic Weed Control Methods Test ("Project"). Unless we all speak up, the Project could involve the application of herbicides to Lake Tahoe. The Action Alternative 1: Testing of Non-Herbicidal Methods Only is the environmentally best choice and should be selected for the proposed weed control test program.

**[>> Protect Lake Tahoe from toxic weed killers—take action by Sept. 3, 11:59 pm.](#)**

Located on the border of California and Nevada, **Lake Tahoe is treasured for its scenic and ecological values not just by residents of those states, but by many others. The [Washoe Tribe](#) considers the lake to be a sacred life-sustaining water, the center of the world.** The lake is designated an "Outstanding National Resource Water" under the Clean Water Act, and is recognized nationally and globally as a natural resource of special significance.

The herbicides chosen for consideration in this program—[florpyrauxifen-benzyl](#), [triclopyr](#), and [endothall](#)—pose risks of potential health and environmental harm not fully assessed in the EIR/EIS, and the non-herbicidal methods alone may prove sufficiently effective for the weed control sought. The Proposed Project, Action Alternatives, and the No Action Alternative all could have potentially significant effects to water quality issues (water temperature, turbidity, dispersal of aquatic fragments, changes in pH, dissolved oxygen, total phosphorus, and total nitrogen concentrations) and aquatic community stability (species diversity, species dominance, seasonal succession). The limited herbicide spot-treatment usage as part of the Proposed Project poses substantial localized risks to human health and environment. A full-scale herbicide use throughout the Tahoe Keys lagoons would be seriously detrimental to the Keys and potentially to the broader Lake Tahoe. The Action Alternative 1: Testing of Non-Herbicidal Methods Only would have the least potential for any serious and unwanted effects. Action Alternative 1 is the environmentally superior choice and will likely

demonstrate the effectiveness of non-herbicidal methods in controlling the aquatic weed problem. TRPA/LRWQCB should select this alternative for the proposed weed control test program.

Separate from the weed test control program, nutrient inputs into the Tahoe Keys from residential and landscape fertilizer use and vehicular (auto and boat) exhaust emissions contribute to the eutrophication and weed problem in the Keys and Lake Tahoe in general. TRPA/LRWQCB should continue and expand existing efforts limiting nutrient inputs that aggravate aquatic weed proliferation in the Tahoe Keys lagoons and will continue to hinder weed control efforts.

[See Beyond Pesticides' detailed comments.](#)

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I am writing to agree with the draft EIR/EIS authors that the Action Alternative 1: Testing of Non-Herbicidal Methods Only is the environmentally best choice and ask that the Tahoe Regional Planning Agency/Lahontan Regional Water Quality Control Board (TRPA/LRWQCB) choose this alternative for the proposed weed control test program.

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The herbicides chosen for consideration in this program pose risks of potential health and environmental harm not fully assessed in the EIR/EIS, and the non-herbicidal methods alone may prove sufficiently effective for the weed control sought. The Proposed Project, Action Alternatives, and the No Action Alternative all could have potentially significant effects to water quality issues (water temperature, turbidity, dispersal of aquatic fragments, changes in pH, dissolved oxygen, total phosphorus, and total nitrogen concentrations) and aquatic community stability (species diversity, species dominance, seasonal succession). The limited herbicide spot-treatment usage as part of the Proposed Project poses substantial localized risks to human health and environment. A full-scale herbicide use throughout the Tahoe Keys lagoons would be seriously detrimental to the Keys and potentially to the broader Lake Tahoe. The Action Alternative 1: Testing of Non-Herbicidal Methods Only would have the least potential for any serious and unwanted effects. Action Alternative 1 is the environmentally best choice and will likely demonstrate the effectiveness of non-herbicidal methods in controlling the aquatic weed problem. TRPA/LRWQCB should select this alternative for the proposed weed control test program.

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aggravate aquatic weed proliferation in the Tahoe Keys lagoons and will continue to hinder weed control efforts.

Please see comments submitted by Beyond Pesticides, which I support. Thank you for your consideration of these comments.

Sincerely,

LEAD for Pollinators, Inc.