



December 13, 2021

Joanne Marchetta,  
Tahoe Regional Planning Agency  
128 Market Street  
Stateline, NV 89410

Re: Tahoe Keys Weeds Control Test

The Lake Tahoe Marina Association, as an organization representing all the California and Nevada marinas on Lake Tahoe, is highly focused on the health and beauty of the Lake. Not only are the marinas dependent on the sparkling blue waters, but the management and staff of all of the marinas have a high level of pride in the pristine environment in which we live and work. We see all aquatic invasive species as a real and present danger to the health of Lake Tahoe. We have monitored the years of scientific research and numerous tests and attempts to control invasive species up to this point. Some of our marinas have and continue to volunteer as test sites for new and innovative approaches.

Now, like many others we recognize that the problem is continuing to grow, and the threat to the Lake is more dire than at any time in the past. A more intensive search for solutions and implementation of such solutions is a critical step towards insuring the future beauty of Lake Tahoe. We see the Tahoe Keys as a natural focal point for such efforts. While aquatic invasive species have been found in many locations around the lake, nowhere is the problem more concentrated than in the waterways that are isolated from the main body of the lake.

We have reviewed the Draft NPDES Permit and conclude that the "Tahoe Keys Lagoons Aquatic Weed Control Methods Test" is a reasonable, safe and necessary step, and we offer the full support of the Lake Tahoe Marina Association.

Sincerely,

M. Elie Alyeshmerni, President

Subject: Tahoe Keys herbicide and UV trials for aquatic weed control

Dear Tahoe decision makers,

This letter is written in strong support of the proposal to do a herbicide and UV trial applications to several of the sealed off Tahoe Keys Lagoons. Over my sixty years of research as former Director of the UC Davis Tahoe Research Group I have watched the aquatic weed problem in the Tahoe Keys escalate until it has become a lake wide problem. Over the years the aquatic weed fragment from mowing have taken hold around the margins of the lake and particularly in marinas. Invasive warm fish from the Keys have followed these patches of weeds and now can be observed as far from the keys as Star Harbor on the north shore.

Over many years the Lahontan Water Control District has required a strict ban on the use of any herbicides in the basin and this was a reasonable, conservative course of action before the Keys weed problem became so critical. I have tried over the last decade to convince the leadership that it was time to consider the reality of the aquatic weed problem and take more drastic action. Over the years herbicides which degrade in days not weeks have been developed and would be used in the current application. The UV light weed eradication trials needs to be further tested at the same time which I understand will be tested with and without herbicides. I have seen objections expressed as if the lake was to be poisoned when in fact the keys is the controlled target and the areas treated are to be double screen in order to contain the herbicide test application areas and not allow aquatic herbicide to enter the lake.

Climate Change should also be considered in support of a decision to allow for the proposed controlled test treatments. Tahoe is measurably warming with the weed choked warmer pockets in lagoons warming more than the lake. These warmer areas are already promoting the growth of cyanobacteria which tend to flourish by benefiting from warmer water, nutrients and lack of circulation from the massive weed growth. It is important to note that these cyanobacteria produce neurotoxins that are harmful to both humans and animals and are a serious indication of the eutrophication of our waterways. One positive step that the Keys could also take to suppress toxic algal growth is to do away with irrigated and fertilized grass lawns.

In summary I believe that the time has come to allow this testing of what promises to be a more effective water management of the Tahoe Keys. It is important to give lake science a chance to prove that this is not only a safe and desirable approach but also a very important one for the good of Tahoe, our increasingly threatened lake ecosystem.

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