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Tahoe Area Sierra Club

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TASC BRIEF COMMENTS ON THE BASIN PLAN AMENDMENTS TO ACCOMMODATE PREVIOUS PESTICIDE USE PRACTICES AND INCREASE THE OPPORTUNITY FOR MORE USE OF MORE POISON IN THE LAKE TAHOE BASIN, THE EASTSIDE OF THE SIERRA AND THE EASTSIDE OF THE CALIFORNIA DESERTS.

The TASC opposes unlimited poisoning experiments that last an unlimited amount of time, and produce unknown results. The accumulation of hundreds of these experiments is fraught with potential short and long-term impacts and it is entirely unknown whether the experiments will actually benefit the public in the long-term. All comments below apply equally to the entire Lahontan Basin and references to Lake Tahoe do not exclude the entire Lahontan Basin.

Comments

Lahontan RWQCB is proposing a basin plan amendment that accommodates and facilitates use of pesticides, herbicides and piscicides in the waters of the Lake Tahoe Basin and its tributaries. While mosquito abatement is expected to continue with or without the basin plan amendment, the application of these poisons directly to the waters of the basin is intended to kill plants, fish, bugs and macroinvertebrates in the waters and the bottom sediments.

The piscicide rotenone is prohibited for use on land and in marine bays, lagoons and estuaries. It is only allowed to be used in fresh water. It is banned in the EU for all applications. This poison kills everything in the water that uses oxygen.

The amendments to the Basin Plan constitute a dangerous action that permits long-term impacts that are unknown to be undertaken over an unlimited amount of time until results are actually known, and that time is not known. The fact that the permit allows three unknowns (amount of time to test the poison and its killing ability in the lake and tributaries, a date when the results will be known, and the long-term impacts) all in the name of the public benefit is precarious at best.

The long-term impacts are unknown and the public benefit is unknown.

This is an experiment with no limits. Projects can receive a permit, take three years to complete, and two years later the monitoring of results begins, and

sometime after that, results will be released, giving the public a five year project plus at least five to ten years for long-term results to be known

The process of permit to results described above is not limited to the number of experiments that can be conducted at any time. The only alleged limit is the requirement of an environmental document by the applicant. That kind of limit is about as fungible as possible – the agency can change the environmental document requirement to accommodate the poisoner. The agency can reduce the scope of the environmental document to accommodate the poisoner. The agency can waive the environmental document to accommodate the poisoner.

There is no limit on the number of projects that can be undertaken anywhere in the Tahoe Basin or in the entire eastside of the state in the Lahontan Region. In the next 20 years, hundreds of large poisoning projects can be undertaken even though most of the results of these poisonings won't be known for years.

WHERE IS THE PUBLIC BENEFIT?

The Proposed Basin Plan amendment claims a rigorous monitoring program. There is no contingency for a poisoner failing to monitor because of taxpayer funds being cut. There is no contingency for a poisoner failing to monitor because a contract was flawed. There is no contingency for a poisoner failing to monitor because climate change thwarted the monitoring regime. In short, there is no backup plan for the failure to perform the monitoring that is allegedly so rigorous.

The Lahontan RWQ basin is faced with using an old technique (poisoning) because it is both accommodating and facilitating for short-term solutions.

The action is unconscionable. TASC requests that the Regional Board at the very least reduce the number of poisoning experiments to two and await complete results of long-term trends until authorizing any more such projects.