



November 1, 2021

Lahontan Regional Water Quality Control Board
Attn: Russell Norman
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150
lahontan@waterboards.ca.gov

Subject: Tahoe Keys Weeds Control Test project

Dear Mr. Norman:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments on the tentative Resolution, tentative Permit, and Mitigation Monitoring and Reporting Program for the Tahoe Keys Weeds Control Test project (Weeds Project). FOWS mission is to work toward the preservation, protection, and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations. FOWS represents community interests from Emerald Bay to south of Tahoe City.

FOWS is concerned that the Water Board aims to permit the use of herbicides contrary to the findings of the environmental analysis that the non-chemical action alternative (Alternative 1) is environmentally superior. We also are concerned that the Water Board's Antidegradation Analysis fails to address the Clean Water Act's requirement that there be no feasible alternatives available to address the issue, when in fact there are other methods to address the weed infestation (as evinced by Alternative 1).

We herein support and incorporate by reference comments submitted by the Sierra Club, Tahoe Area Group, on the subject project.

Thank you for considering these comments.

Sincerely,

Judith Tornese,
President

Cc: Joanne Marchetta, TRPA