



League to Save Lake Tahoe

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March 14, 2023

To: Meghan Walsh, Lahontan Regional Water Quality Control Board; Trevor Miller, Lahontan Regional Water Quality Control Board

Re: Board Order No. R6T-2023-XXXX, Granting Clean Water Act Section 401 Water Quality Certification and Basin Plan Prohibition Exemption, Lake Forest Boat Ramp Maintenance Dredging Project, Placer County– **Lack of Proper Pre-Project Dredging Monitoring Requirements**

The purpose of this letter is to express the League to Save Lake Tahoe's (League) concern with the Lahontan Regional Water Quality Control Board's (Lahontan) insufficient pre-project dredging monitoring requirements for the Lake Forest Boat Ramp Maintenance Dredging Project, and to ask Lahontan to require the applicant to complete a proper aquatic invasive plant survey prior to and within 30-45 days of the project's start; currently the applicant is planning to rely upon a survey from the prior hydrologic and calendar year. The League is concerned that Lahontan is setting a bad precedent for future projects by allowing a survey from ten months prior to be utilized for current projects, given the rapid spread of aquatic invasive plants (AIP) in Lake Tahoe.

Early detection, prevention, and control are the best defenses against AIP and offer the best hope for successful management of aquatic invasive plant infestations in Lake Tahoe. AIP can be difficult and costly to control once widespread establishment has occurred. The League and our partners have worked vigilantly on a strategy for Lake Tahoe, which has demonstrated efficacy in controlling satellite infestations over the past five to seven years. Allowing an AIP survey from 2022 to be utilized for a 2023 project increases the threat of AIP spread in Lake Tahoe. AIP are spreading throughout Lake Tahoe, with new infestations recently identified in Emerald Bay at the end of 2022, as an example, since the most recent Lake Forest AIP survey was completed.

The League is dedicated to protecting and restoring the environmental health, sustainability and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we advocate for projects that control and manage AIP in the Lake Tahoe watershed to a point of ecological insignificance, thus protecting Lake Tahoe's fragile ecosystem.

Please have the project applicant survey for AIP prior to dredging within an appropriate time frame before approving this permit. We are dedicated to continuing our work with Lahontan on protecting Lake Tahoe's renowned water quality and clarity.

Please feel free to contact me with any further questions.

Sincerely,

Laura Patten

Laura Patten
Sr. Science Policy Analyst
League to Save Lake Tahoe