



**Tahoe Water
Suppliers
Association**
Protect the Source

1220 Sweetwater Road
Incline Village, Nevada, 89451
775-832-1212



Public Comment
Pesticide Prohibition BPA
Deadline: 3/1/12 by 12:00 PM

TWSA Members:

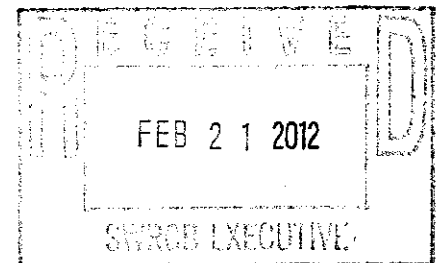
Cave Rock Water System
Edgewood Water Company
Glenbrook Water Company
Incline Village GID
Kingsbury GID
Lakeside Park Association
North Tahoe PUD
Round Hill GID
Skyland Water Company
South Tahoe PUD
Tahoe City PUD
Zephyr Water Utility

February 14, 2012

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000

RE: Public Comment / Lahontan RWQCB Basin Plan Amendment

Dear State Water Resources Control Board:



The Tahoe Water Suppliers Association (TWSA) consists of public water suppliers in the Lake Tahoe Basin whose source of drinking water is Lake Tahoe. The majority of TWSA members pull water directly from Lake Tahoe to service their customers. The purpose of the association is to protect the quality of the purveyors' drinking water from waterborne contaminants that are potentially harmful to human health. Source water protection is an effective tool in a multi-barrier approach to protecting drinking water.

First, we wish to recognize the cooperative efforts of the Lahontan Regional Water Quality Board and staff, in arriving at the proposed basin plan amendment language as currently written. The proposed language now includes bringing the public water providers and the Nevada and California drinking water regulators into the review process for projects proposed at Lake Tahoe. We appreciate this effort toward mitigating our concerns.

However, as drinking water providers at one of the most pristine water bodies in the United States, we are still very concerned about the potential impacts to drinking water quality from chemical introduction to the waters of Lake Tahoe.

The Lake Tahoe watershed has benefited from a long history of source water protection, allowing local water providers to provide exceptionally high quality drinking water to their customers, with minimal treatment. Several water providers maintain a rarely granted status

for a drinking water provider within a watershed open to multiple uses; holding filtration exemption status with the US EPA regarding water treatment requirements.

There are 160,000 public water systems in the United States, only, sixty of which are filtration exempt water systems. Six of those sixty are Tahoe Water Supplier Association members, located here at Lake Tahoe. It is unusual for the US EPA to grant filtration exemption status to a drinking water provider located in a watershed open to multiple uses, such as Tahoe. These six filtration exemptions attest to the high water quality of Lake Tahoe.

Lake Tahoe is a Tier 3, Outstanding National Resource Water (ONRW). This is the highest designation of a non-degraded water body in the nation. Lake Tahoe is not simply a California water body; these are federally owned waters, Tahoe is a national treasure.

Therefore, the Tahoe Water Suppliers Association supports the continued prohibition on the use of any chemical agents in Lake Tahoe*.

The proposed Basin Plan Amendment incorporates EPA wording on page 21 as follows: *EPA guidance has not defined temporary and short-term specifically, but views these terms as limiting water quality degradation for weeks or months, not years. Any proposed project which has the potential to impact drinking water quality, for even a short period of time, may have the potential to affect the filtration exemption status and consumer confidence of an affected water purveyor. Due to storage limitations, any project having impacts longer than 1 day could create major service issues for surface water providers, and undermine consumer confidence in the quality of the municipal water supply. How much water would be provided per customer and for how long? The volume of water needed for this mitigation measure need to be realistically evaluated. Many providers service thousands of customers. Using an alternative source of water during a project as a sufficient mitigation for the systems at Lake Tahoe, may not be realistic.*

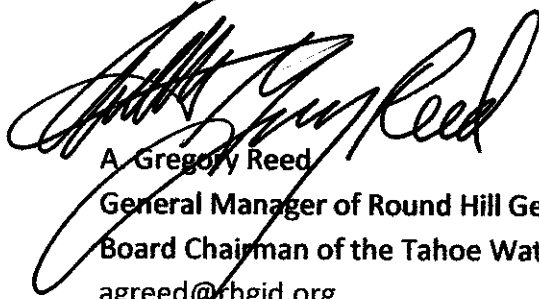
The Tahoe Water Suppliers Association has provided written and verbal comments to staff of the Lahontan Water Board throughout the past year. Staff has incorporated some of our recommendations into this final proposed Basin Plan Amendment. TWSA most recently delivered oral comments to the Lahontan Board on December 7, 2011. Again, the Board incorporated some changes to the proposed amendment, creating the version that is now before you.

However, as drinking water providers at one of the most pristine water bodies in the United States, we are still very concerned about the potential impacts to drinking water quality from chemical introduction to the waters of Lake Tahoe. The exceptional status that Lake Tahoe holds as a Tier 3-ONRW, which supports the unrivaled drinking water quality that Tahoe offers for its residents and global visitors, should not be overlooked.

Therefore, the Tahoe Water Suppliers Association urges the State Board to modify the Lahontan Basin Plan to support continued prohibition on the use of any chemical agents in Lake Tahoe. We believe Lahontan RWQCB should successfully evaluate pesticide/herbicide usage under field conditions in the non-ONRW designated water bodies within their purview; before even considering such use at Lake Tahoe.

In closing, we would like to again acknowledge the professionalism of the Lahontan staff in our collaborative effort to incorporate the water provider's concerns into the Basin Plan Amendment.

Respectfully submitted on behalf of the TWSA Board,



A. Gregory Reed

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Board Chairman of the Tahoe Water Suppliers Association

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** As noted in previous public comment to Lahontan RWQCB: the one exception of chemical use that TWSA supports is to address a potential state declared emergency involving the Aquatic Invasive Species of zebra/quagga mussels.*

CC: Madonna Dunbar, TWSA
TWSA Board Members