Patty Z. Kouyoumdjian, Executive Officer
Lahontan Regional Water Quality Control Board
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150

January 31, 2017

RE: Section 13267(b) Compliance Report for Order No. R6T-2014-0059 – WDID 6A090089000

Dear Ms. Kouyoumdjian,

This report is submitted by the Tahoe Keys Property Owners Association (TKPOA) in response to the requirements specified in Lahontan Regional Water Quality Control Board Order No. R6T-2014-0059 (Order) Section II.D, Annual Reports and Updates.

This report covers 2016 activities under the Order, and includes a discussion of all requirements including an updated Integrated Management Plan, updated Nonpoint Source Water Quality Management Plan, Aquatic Plant Monitoring Plan, Bottom Barrier Implementation Program Summary, and Operations and Maintenance Report, in addition to the activities tentatively planned for 2017.

**Integrated Management Plan for the Control of Aquatic Macrophytes**
TKPOA, through adaptive management, has updated and appended herewith (Attachment 1), for your review and acceptance, its Integrated Management Plan for the Control of Aquatic Macrophytes (IMP) in accordance with Section II.C. of the Order.

**Nonpoint Source Water Quality Management Plan**
TKPOA has updated and appended herewith (Attachment 2), for your review and acceptance, its Nonpoint source Water Quality Management Plan (NPS Plan) in accordance with Section II.B. of the Order.

**Aquatic Plant Monitoring Plan**
TKPOA conducted detailed aquatic plant monitoring surveys of the Tahoe Keys Main (west) Lagoon and Tahoe Keys Marina (east) Lagoon in 2014, 2015, and 2016. Surveys were also conducted in the Lake Tallac Lagoon in 2015 and 2016. The 2016 survey is appended herewith (Attachment 3) for your review. The 2016 survey included the successful use of a hydro-acoustic system that was purchased in 2015. With comparable data, the approximate volume of plants in the Tahoe Keys Lagoons can now be tracked from year to year to show changes in the infestation. The 2017 survey plan will be the same as the 2016 plan to ensure consistency of data collection.
Bottom Barrier Implementation Program
In 2016, TKPOA expanded its bottom barrier program for property owners. 18 property owners were able to successfully install barriers around docks and shorelines to hinder the growth of aquatic plants. A report is appended (Attachment 4) further describing the results of the 2016 program. The TKPOA will offer the bottom barrier program for its property owners in 2017 that follows the same permit requirements as 2016.

Operations and Maintenance Report
TKPOA conducted aquatic plant removal operations again in 2016 using its harvesting equipment and boats from which staff collected floating fragments. The aquatic plants removed in 2016 had a freshly harvested volume of approximately 10,000 cubic yards, which is less than the reported 16,300 cubic yards removed in 2015. However, the reduced volume is not believed to be due to reduced aquatic plant growth, but rather due to an error in the reporting system used in previous years. Further improvements to the harvesting program will be made in 2017 including the planned purchase of a new fragment collection boat and the use of a scale to more accurately report the amount of plant material removed from the Tahoe Keys Lagoons.

Other Planned 2017 Activities
TKPOA will continue its adaptive management program activities for several requirements under the Order. In 2017, TKPOA plans to further implement the IMP (Attachment 1) and NPS Plan (Attachment 2) in addition to conducting its third year of hydro-acoustic monitoring and implementation of the Bottom Barrier Program. In addition, TKPOA will be submitting several additional reports within the next month to provide baseline data and background information for the 2017 adaptive management review process.

By letter dated January 17, 2017, TKPOA submitted to the Lahontan RWQCB an application for an exemption to the Lahontan Basin Plan prohibition on the use of herbicides. The application requests approval to conduct a combined aquatic plant control methods evaluation that includes a demonstration of herbicide use in backwater areas of the Tahoe Keys Main (west) Lagoon. Environmental regulatory and public review processes are anticipated in 2017 so that the demonstration project can take place in spring 2018.

Additional WDR Compliance Actions
By letter dated August 18, 2016, the LRWQCB identified three additional WDRs related compliance actions for TKPOA. The status of those actions is as follows:

1. On October 1, 2016, TKPOA submitted to LRWQCB a revised IMP that moved information related to herbicide control methods into an appendix.
2. TKPOA has had preliminary discussions with the City of South Lake Tahoe regarding coordination on shared stormwater facilities. TKPOA began a comprehensive data collection program in 2016 to locate and GPS all visible storm drains into the Tahoe Keys lagoons, and plans to complete this inventory in 2017 or 2018. In 2017, TKPOA plans to meet with the City of South Lake Tahoe
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To discuss how the facilities that are shared with TKPOA will be inspected and maintained. As the field data collection is completed and meetings with the City move forward, TKPOA will develop a plan for periodic inspection of its non-shared stormwater facilities to monitor and address potential future increases in pollutant loads.

3. A preliminary assessment and evaluation of factors contributing to the cycling of nutrients, including nitrogen and phosphorus in both water and sediment, have been performed and will be submitted as part of TKPOA's reports on 2016 additional research and data collection for the Tahoe Keys lagoons. We estimate that these reports will be submitted to you by the end of February 2017.

Certification  
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware of the potential for significant penalties for submission of false information, including the possibility of fines and imprisonment for knowing violations.

Please contact me at 530.542.6444 Extension 224 if you need any additional information regarding this report.

Sincerely,

Kirk J. Wooldridge PCAM®, AMS®, CMCA®, CCAM®, CHA®  
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Attachments  
1 – Integrated Management Plan for the Tahoe Keys Lagoons  
2 – Nonpoint Source Water Quality Management Plan  
3 – Tahoe Keys 2016 Aquatic Macrophyte Survey Report  
4 – 2016 Bottom Barrier Monitoring Report