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Ladies and Gentlemen: I am the President of the LBPT and co-sponsor of the application for a Permit to use ProcellaCor EC—a targeted vs. broad-spectrum Herbicide—to control invasive Milfoil (EWM) on Lake Bomoseen, a waterbody of over 2400 acres. We are opposed to HB 31 as both unnecessary and misleading.

From the very beginning of the Permit application process, we have tried to be factual and open about all of the issues discussed in these hearings, especially:

- 1) The Increasingly Harmful Effects of EWM on the Lake's Ecosystem and its Customary Uses, including Recreational Activities;
- 2) The Absence of Reasonable EWM Control Measures that are both long lasting ( i.e. more than 2-3 weeks duration) AND Economically feasible (see attached Front Porch Forum post on Costs per Acre of DASH, Barriers and Harvesting);
- 3) The central role that the DEC and its scientists plays as Researchers, Knowledge Base, Validator of Factual Information and most importantly, Monitor of Lake Health and Lake Management Activities;
- 4) The sincere, longterm efforts of members of local lake association Boards and Lakefront Home owners to seek out the most reasonable options for protecting and improving the overall health of the Lake.

Over my 45 years of living on the Lake, I have witnessed every method of EWM control that has ever been described in the professional literature, ranging from Lake Drawdowns over the winter, through the use of tiny Water Beetles to eat EWM, through Harvesting, DASH, Barriers, and now a targeted herbicide. The ONLY “green” method of attempted EWM control is Aeration, a process quite similar to the aeration systems employed in most municipal effluent treatment plants and widely used--especially in Southern States--to control invasives' proliferation in warm lakes and ponds. However, this system also is quite expensive, and the DEC determined several years ago that it was ineffective and thus unallowable in Vermont waters (another highly controversial determination).

In our view, HB 31 does nothing to address the issues cited above. While a 2 year moratorium may sound “reasonable,” in reality there has already been a 45+ year moratorium on significantly addressing the ever increasing Milfoil invasion. While some may argue that there is neither a change in the EWM presence nor a “problem” to be addressed, a 2021 Weed Survey found that 88% of the Lake contained EWM, while 50% of native plant species were present in less than 10% of the water column (see attached Weed Survey Summary). Clearly, the continued growth and crowding of EWM plants is resulting in the rapid strangulation of the native species most beneficial to this beloved ecosystem. As proven by 10 other lakes in Vermont, it is time that we begin to meaningful address a growing problem that has been allowed to fester for over 50 years.

Thank you all for your time and consideration in this oftentimes emotional discussion.

Sincerely,

Luca E. Conte, Ph.D.

President  
Lake Bomoseen Preservation Trust, Inc.