

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 Eurasian Watermilfoil (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 been factual and open about all of the issues discussed in these hearings, (see our website at lakebomoseenpreservationtrust.org), especially:

1) The Increasingly Harmful Effects of Eurasian Milfoil on the Lake's Ecosystem and its Customary Uses, including Recreational Activities (see attached **12/2021 Weed Survey Summary**—the full Survey can be found on our website);

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 Mechanical Harvesting**);

3) The central role that the DEC and its scientists play as Researcher, Knowledge Base, Validator of Factual Information and most importantly, Monitor of Lake Health and Lake Management Activities;

4) The sincere, longterm efforts by 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.

Regarding The Harmful Effects of EWM, a comprehensive, detailed Lake Weed Survey was commissioned by the LBPT and LBA as part of our application to the DEC in 2022. While a brief summary is provided below, the key facts from this Survey are: a) **EWM is present in over 88% of Lake Bomoseen; b) fully 50% (17 species) of Native Plant Species were present in only 10% or less of the lake, with 16 Species present in only 5% or less of the lake, and 11 species present in only 3% or less of the lake.** This is clearly the strongest indicator of extreme negative biological pressure on those Native Species which continue to struggle to survive the continually expanding presence of EWM.

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, and Benthic Barriers. Each of these has its critics, and each has been shown to have significant limitations, ranging from extreme cost to a limited time period and/or range of effectiveness. Only the targeted Herbicide ProcellaCor EC

has been proven to be long lasting, cost effective AND remarkably safe, as described by Vermonters who have used this method (**see Ewald Letter below**).

The sponsors of this bill have targeted Lake Bomoseen in particular, using misinformation to intimidate and manipulate town select board members and the public to create an appearance of ‘non-support’ for the use of ProcellaCor in our community.

Opponents, led by a seasoned former lobbyist, show up at town meetings, call ProcellaCor a ‘poison’ and through this mis-characterization easily convince a four or five-member select board to declare a position of ‘non-support’.

These select board votes do not involve any formal community outreach or survey, and yet imply unanimous community consent for this non-support action. In fact, due to the aggressive and intimidating behavior of the advocates of HB31 — especially concerning the “unanimity” of the opposition to ProcellaCor EC as well as the assertion that there is “no EWM problem” — the LBPT commissioned (at its own expense) a private, confidential Survey of over 900 Lakefront Homeowners and Dock Leasers in 2022 in order to examine these fallacious assertions, while protecting the respondents’ identities. This Survey revealed: 1) The vast majority of Respondents believe that EWM represents a “Moderate to Significant” interference to their use of the lake; and 2) The majority of

Respondents approve of the use of three principle EWM control methods (i.e. Mechanical Harvesting, ProcellaCorEC and/or DASH) in roughly equal percentages. It is also notable from this Survey that only a small minority of respondents indicated that we should “Do Nothing” to control EWM.

Please oppose HB 31. Instead, let's focus on increased support of the DEC and the existing regulatory process in the ongoing battle against ALL invasives, a process which relies on time tested scientific study by professional aquatic experts and has served the State well for many years.

Thank you for this opportunity to speak.

Sincerely,

Luca E. Conte, Ph.D.

President

Lake Bomoseen Preservation Trust, Inc.