

Eagle Lake Property Owners Inc. Position Paper re: Invasive Species and use of Benthic Mats

Eagle Lake, like most lakes, has portions of the shoreline where dense aquatic vegetation significantly hampers recreation. The vegetation creates stagnant water which provides a haven for organisms potentially harmful to humans and promotes the growth of undesirable filamentous algae. It is paramount to the health of the lake and the satisfaction of our lake residents that we have a weed control method that is readily available, effective, and easy to use. We believe that Benthic Weed Mat use, uncontrolled by regulations, is that solution.

Over the years residents have used many techniques in an attempt to control dockside vegetation including: cutting, hand pulling, mechanical harvesting, benthic barriers, and many other creative methods. It should be noted that several of these techniques are not only ineffective, but create numerous water quality issues for the lake. Any effort to cut, pull or harvest results in floating weeds and/or shoreline aggregation of rotting weeds which not only are unsightly and smelly, but encourage the growth of bacteria and other harmful conditions to the lake.

A study of the available science has convinced ELPOI that benthic barriers provide a significant environmental improvement over these traditional techniques, while having little negative environmental impact. "Diet for a Small Lake" (published by the DEC and NYS FOLA), page 129, describes benthic barriers as.... "among the safest and least detrimental in-lake physical control technique (for aquatic vegetation) and often offers the greatest public satisfaction". Additionally, Eagle Lake has had a high utilization of benthic mats for well over a decade, with no noticeable impact to the fishery or ecology of the lake.

The proposed General Permit GP-0-17-001, Seasonal Benthic Mat Permit will significantly impact our ability to manage water quality and lakeside resident's satisfaction. Our concern with this is threefold:

- 1) We feel the DEC submission requirements to apply for a benthic mat usage would be considered onerous if not impossible for each and every homeowner using mats around the lake. We also believe having to agree to "carte blanche" access to personal property will prove unacceptable to many. We are convinced the imposition of these requirements will dramatically reduce the utilization of a Best Practice critical to our lake. We believe a good percentage of lakeside residents currently use benthic mats to one degree or another, resulting in a significant number of homeowners impacted.
- 2) We do not believe that DEC will have the capability to analyze and turnaround the many applications (for this lake alone) in the short time frame that allows for the implementation of mats during weed growing seasons. We also do not believe that the DEC ECOs will have the staffing necessary to support any enforcement of these regulations, making the regulation less than mute.
- 3) We also do not understand what the DEC is trying to accomplish with a permitting process that imposes these burdensome requirements on homeowners and their dock side use of Benthic Mats for almost universally utilized best practices already in place. Specifically:
 - What benefit will be realized through the implementation of this requirement?
 - What specific harm to Eagle Lake will be mitigated by this requirement?
 - What evidence exists that would justify the imposition of such an onerous requirement to the homeowners for compliance and the DEC for approval and enforcement?

Sincerely,

Keith Park Secretary, Eagle Lake Property Owners Inc. 10/23/17