October 17, 2013

Senate Natural Resources, Environment, and Great Lakes Committee
Lansing, Michigan

Re: SB 444 – Aquatic Nuisance Species Control

Dear Senators,

The Michigan Environmental Council is an umbrella group of over 65 organizations working on environmental protection and conservation issues across Michigan. A number of these groups are directly involved with inland lake management issues. We would like to provide the committee with the following recommendations and observations:

Non-chemical control methods - We believe the permitting program needs to place greater focus on prevention and non-chemical treatment techniques. The use of chemicals to treat aquatic invasive species have a number of undesirable incidental impacts, such as the removal of native species and the exposure of wildlife and other aquatic species to toxic chemicals. Examples of biological control agents that are native to the region, including the milfoilweevil (Euhrychiopsis lecontei) and Galerucella beetles for Eurasian water milfoil and Purple loosestrife control, respectively.

We do not support easing the use of chemical for treatment unless applicants have also engaged in prevention activities to reduce nutrient loading to the lake and have made good faith attempts to use native biological control methods.

Automatic approval – We do not support automatic approval for permits that are not addressed in a timely manner. This issue is a funding issue that needs to be addressed by the legislature, not an excuse to issue permits with insufficient review.

We strongly oppose provisions which would allow applicators to independently increase the size of coverage and the amount of chemicals used and notify the department after the fact.

Ordinance development and implementation – We support the use of ordinances for activities that are designed to prevent the growth and spread of nuisance species, such as those designed to reduce nutrient loading to the lake systems.
We are willing to work to refine the concepts included in the bill, but do not support the legislation moving forward at this time.

Sincerely,

James Clift, Policy Director
Michigan Environmental Council

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