

From: [Wayne Gruen](#)
To: [ECY RE Aquatic Permit Comments](#)
Subject: Lake Permits for small private lakes
Date: Thursday, September 16, 2010 1:31:43 PM

The Lakemoor Community Club (a housing development of 285 homes) supports the following recommendations from the company that treats our lake. We only treat our swim areas to protect the children swimming in our lake, control algae bloom and lily pad growth. We stock the lake with trout for the benefit of our residents.

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- We generally support this permit program, aquatic herbicides are a necessary tool for the management of Aquatic Weed Growth and we require a system to utilize these tools where appropriate.
- Ecology should consider the economic impact of developing the required discharge plans. There are many things present such as need for bathymetry map that may cause excessive costs and make smaller projects unfeasible. These plans are a new cost we will have to bear and will impact our ability to manage noxious or nuisance weed and algae growth
- In the past Ecology staff have denied submitted plans as a means of halting treatment programs. As long as submitted plans meet the criteria listed in your document there should be no additional need to require re-submittal
- Diquat should not be subject to the fish timing windows. Ecology funded research have shown little to no impact. There are cases where this tool is necessary to manage noxious aquatic weeds and is the only option, but timing windows prevent it's use
- There are US EPA registered products missing from the list of approved products. Chelated copper algaecides may be necessary to treat toxic algae blooms, Galleon herbicide has a role against hydrilla and other species. These need to be added to the permit
- There must be an easy way for products that receive registration after this permit is issues to be added to the permit
- Phoslock should be added as a nutrient inactivation tool

Sincerely,

Carol Gruen, Secretary
Lakemoor Community Club