

11/06/25

Mike Wichrowski, Lands & Facilities Administrator  
VT Department of Fish & Wildlife  
Montpelier, VT

Dear Mike,

Thank you for your response to the Joe's Pond Association (JPA) preliminary proposal for a boat wash/decontamination station at the Joe's Pond DF&W boat access previously transmitted to you by email on 10/23/25.

As I'm sure you can imagine, the JPA is disappointed in the substance of the DF&W evaluation and beyond that, takes express issue with the bases of your conclusions.

Equally disheartening is the seeming unwillingness of the DF&W to substantively collaborate with the JPA to significantly enhance and improve our ability to prevent the introduction of additional aquatic invasive species (AIS) into Joe's Pond and, perhaps even more importantly, prevent the export of Eurasian Watermilfoil (EWM), which has already infested Joe's Pond, inevitably to other currently EWM-free Vermont waterbodies.

The DF&W can rationalize all it wants that merely staffing the greeter station at high-use times is "more cost-effective". Perhaps so, but only if you ignore the ever-expanding costs of AIS containment and management with which a lake association is saddled, most likely in perpetuity, once introduced, and as the JPA is already experiencing.

It cannot in any way be argued convincingly that a greeter inspection program alone, regardless of how many hours staffed, will be more **functionally effective** than an inspection program, at equal staffing levels, backed up and supplemented by a fully equipped boat wash & decontamination station.

For instance, spiny waterflea can easily escape visual detection as can zebra mussel veligers, rusty crayfish eggs, and minute fragments of numerous aquatic invasive plant species. All these AIS and others are much more likely to be removed from boats and trailers through operation of a fully equipped decontamination program. One would surmise that the DF&W would appreciate a partnership with any lake association willing to expend the resources to develop and operate such an ecological protection program.

JPA already fully staffs its greeter program at high use times and more and is proud to have maintained a vigorous inspection program for many years. As evidence of the point the JPA is making here, despite our robust efforts at boat inspection (absent a decontamination station), EWM still found its way into the lake and has become an enormous and potentially overwhelming problem sorely taxing the management and containment capabilities of the association.

DF&W has made the claim that an inspection program alone without decontamination capacity is "more cost effective". FYI, the JPA plans to provide the financial resources for project construction and to endow an operation and maintenance fund in perpetuity for this proposed facility. Cost-effectiveness need not be of any concern to the VT DF&W or ANR or represent any rational argument for why this proposed facility should not be built. The JPA intends to conduct the most effective lake protection program that we are able and take responsibility for eliminating the potential export of AIS to other waterbodies.

Virtually every piece of information published, on-line or in print, by VT ANR relating to control of AIS spread and proliferation, emphasizes and places highest priority on prevention of introduction into new waterbodies. The JPA embraces this strategy and intends to implement it to the greatest extent possible. We need the DF&W to embrace this concept as well, consistent with your mission.

10 V.S.A. Section 1453 (b)(2) states that the Agency of Natural Resources “shall work with....local interest organizations....to develop long range programs regarding aquatic nuisance controls.” The JPA constitutes a local interest organization and is certainly proposing here a long range program. The DF&W response to the JPA proposal appears to be inconsistent with this statutory mandate.

The issue DF&W has raised of whether the JPA proposal constitutes a permissible activity is a question completely separate from the proposal submitted to DF&W. As an initial step to this project development process, the JPA has asked whether the DF&W, as the landowner and property manager, will allow the JPA to install, operate, and maintain a boat wash and decontamination station for the purpose of preventing AIS introduction into Joe’s Pond and export of AIS to other waterbodies. The question of whether the JPA proposal is a permissible activity under the VT Wetland Rules is appropriately addressed at a later step of this project development process.

It does not seem appropriate to the JPA that the DF&W speculate, at this stage of the process, that “it’s unlikely that it (the JPA proposal) would be a permissible activity” by VT DEC under the VT Wetland Rules.

VT Lake Associations, including the JPA, bear disproportionately the burden of AIS spread prevention and ultimately of AIS management once introduced into the waterbody. VT Lake Associations and their members also suffer disproportionately the social, financial and ecological costs of AIS proliferation. As the JPA works to discharge our responsibilities to our membership, to Joe’s Pond, and all other VT waterbodies (and beyond) to implement a complete AIS spread prevention and containment program, we can much more effectively accomplish our purpose when the ANR is acting as a collaborative and supportive partner.

The JPA can appreciate the value of public access to Joe’s Pond and recognizes the constraints of limited space. We acknowledge the JPA proposal would result in the loss of two parking spaces in order to facilitate access and egress to the proposed boat wash/decontamination station. But we should honestly assess our collective and shared purposes and priorities.

Introduction of AIS into VT waterbodies presents significant potential to dramatically degrade water quality, aquatic habitats, native plant and animal species, and the functions and values of all wetlands adjoining the waterbody. Why wouldn’t the ANR, through the actions and decisions of the DF&W and DEC, support a lake association that is doing everything within its capabilities and resources to prevent AIS introduction and export?

We need to examine the big picture. Just how often is the Joe’s Pond boat launch area so plugged up with vehicles that these two spaces are critical? While this data obviously does not exist, anecdotally, it can be accurately and confidently stated that this area of the boat launch is used for parking extremely infrequently. And in consideration of the almost negligibly limited extent to which it appears vessel access to Joe’s Pond would be affected through implementation of the JPA proposal, how could this possibly outweigh and become a higher

priority than accomplishing a significant reduction in the likelihood of AIS introduction and export?

If preservation of the functions and values of existing Joe's Pond-associated wetlands from the negative impacts of AIS introduction means so little to the DF&W, that it would assign greater value to two parking spaces, then maybe the DF&W should consider agreeing that the JPA fill additional area of the wetland buffer (if permitted under the VT Wetland Rules) to create two new offsetting parking spaces? This is a potential project extension that the JPA is willing to undertake if it should constitute acceptable mitigation for the lost parking spaces.

What is the ANR priority here? Preserve parking area and prohibit a small encroachment into a wetland buffer thereby increasing the likelihood of AIS introduction, and degradation of the social, economic and natural resource values of Joe's Pond and its associated wetlands? Or will the ANR priority be to form a functional and mutually beneficial relationship with the JPA to mitigate any limited disruption of vessel access and reduce the likelihood of AIS proliferation and its associated widespread ecological loss?

The JPA respectfully requests that the VT DF&W reevaluate its stated position on the JPA proposal.

Thank you for your attention to this important matter.

For the Joe's Pond Association

Albert Hebert, President

Barry Cahoon, Water Quality Director, Eurasian Watermilfoil Management Coordinator

cc: DF&W Commissioner Jason Batchelder

ANR Secretary Julie Moore

Senator Scott Beck