To: Peter S. Silva, Assistant Administrator for Water, USEPA
From: Elizabeth Perry Thomas, President, Federation of Vermont Lakes and Ponds
Re: Comments on USEPA's National Lakes Assessment Draft Report
Date: January 21, 2010

The Federation of Vermont Lakes and Ponds (FOVLAP) is a federation of local lake associations from throughout Vermont dedicated to the protection of Vermont's lakes and ponds.

We have reviewed USEPA's National Lakes Assessment draft report and appreciate the opportunity to comment on the report. We would like to focus our comments in particular on the report's finding that the degradation of lakeshore habitat cover is the most important stressor of lakes nationwide. Thirty-six percent of the nation's lakes have poor shoreline habitat, and poor biological condition is three times more common in these lakes.

This finding does not surprise us. The protection and restoration of lakeshore habitat has been a priority issue for FOVLAP for the past several years. With grant funding provided by the state of Vermont, we are currently working to develop social marketing tools to assist our member associations in: (1) educating lakeshore property owners regarding the negative impact that shoreline development can have on lakes, and (2) motivating property owners to take action to restore and protect lakeshore habitat. We also recently testified in the Vermont Legislature in support of legislation that would establish a 50-foot buffer along all of Vermont's navigable waters.

We feel this two-pronged approach of information/education and regulation is essential to protect Vermont lakeshores from further degradation and begin the process of restoring lost habitat. ***But we need your help as well to bring this critical issue to the forefront on a national level.*** Local lake associations have repeatedly told us of situations where new landowners, moving to Vermont from more developed states, immediately clear all vegetation from their lakeshore property in preparation for building their dream home. By the time the lake association and neighbors become aware of the situation, it's too late. These newcomers are unaware that their actions are negatively affecting the lake they treasure.

In the past, the USEPA has focused major national educational campaigns on the environmental impacts of acid rain and nonpoint source pollution, turning these once little known issues into household words. ***The results of the National Lakes Assessment show that it is past time for a similar national educational campaign focused on the environmental impacts of shoreland development.***

The attributable risk analysis of the NLA data suggests that eliminating the effects of poor lakeshore habitat cover could improve the biological condition in 40% of the nation's lakes. In addition to a national educational campaign focused on protecting and restoring lakeshore habitat, ***states and local organizations need funding to adapt national educational messages to local situations, to provide technical assistance to communities and property owners seeking to protect or restore shoreland habitat, and to implement lakeshore restoration projects***. Funding similar to that previously provided for acid rain research and monitoring, and nonpoint source management, is needed to address this most significant source of lake degradation. Technical guidance to state lake assessment programs on determining how much unbuffered lakeshore development lakes can sustain before becoming impaired would also be helpful.

In summary, the National Lakes Assessment pointed out the relative importance of lake stressors for restoring and maintaining lake integrity. The degradation of lakeshore habitat cover is the most important stressor of lakes nationwide, affecting more than one-third of the nation's lakes. We urge USEPA to act quickly to develop a national educational campaign and provide targeted funding and technical information to assist states and local organizations before any more of our lakes are degraded due to the loss of lakeshore habitat.