

# **Lake Carmi Camper's Association, Inc.**

## **P.O. Box 1, Franklin, VT 05457**

Laura DiPietro  
Vermont Agency of Agriculture, Foods & Markets  
116 State Street  
Montpelier, VT 05620-2901

Re: Petition by the Conservation Law Foundation dated May 22, 2014

Dear Ms. DiPietro,

The following are written comments by the Lake Carmi Camper's Assoc., Inc. in response to the above petition and the public hearing conducted on the matter July 18, 2014.

The Lake Carmi Camper's Assoc. is a non-profit tax exempt organization that represents more than 250 families that reside around Lake Carmi. Lake Carmi is located in Franklin County near the Canadian border. It is 1402 acres in area with a watershed covering 7710 acres. The average depth of the lake is 13 feet. The main outlet to the lake feeds into the Pike River and eventually Lake Champlain.

Lake Carmi State Park, the largest state park in Vermont resides on the southeast shore of the lake.

Lake Carmi is an impaired lake according to Vermont Water Quality standards. It is plagued by milfoil infestations in more than 200 acres of its littoral zone and has the highest mean concentrations of phosphorous and chlorophyll of all the inland lakes in Vermont. The milfoil infestation was documented in a 2010 survey conducted by the Darrin Fresh Water Institute of Bolton Landing, NY. The phosphorous and chlorophyll concentrations are documented in the 2013 VT DEC Lay Monitoring Report.

A TMDL for Lake Carmi was approved by the EPA on April 9, 2009. Despite concerted efforts to improve the water quality of the lake it is apparent that there has been little or no progress in this regard. In fact based on the 2013 statistics in the VT-DEC Lay Monitoring Report the water quality has worsened from 2012 to 2013.

Lake Carmi is surrounded by farms. It is obvious that the lake is receiving disproportionate loads of phosphorous. The above cited TMDL established that 80% of the nutrient loading emanates from agricultural activity. Water samples extracted from Lake Carmi tributaries from 2008 to the present support the TMDL data. The water

sampling results may be viewed on the VT Agency of Natural Resources website through

It is therefore imperative that best agricultural management practices be required on all farms in the Lake Carmi watershed. Although some farms in the watershed practice good management, some do not, causing the lake to absorb disproportionate amounts of nutrients (phosphorous). The Lake Carmi Camper's Assoc. strongly supports any actions that will reduce phosphorous loading to our lake. The lake can only absorb so many nutrients before it turns green rendering it unusable for recreational activities. We implore the Agency of Agriculture to grant the CLF petition and establish the best agricultural management practices in the watersheds within the Missisquoi Bay Basin. We believe this to be essential to affect any positive change in the water quality of Lake Carmi. The authority of the Agency of Agriculture must play a stronger part in improving the water quality in our lakes and ponds.

Thank you for the opportunity to provide written comments on such an important matter. Please feel free to contact me at 774-258-0216 or [peterben@charter.net](mailto:peterben@charter.net) with any questions or for additional information regarding Lake Carmi.

Very truly yours,

  
Peter Benevento  
President LCCA