

## Michigan Aquatic Managers Association

Dedicated to the Professional Management of Michigan's Aquatic Resources

www.mamagroup.org

January 25, 2024

Michigan Legislature

RE: SB 393 & SB 394

The Michigan Aquatic Managers Association (MAMA) members are commercial applicators providing services to tens of thousands of riparians throughout the State of Michigan. Our members represent the majority of permits issued by EGLE's Aquatic Nuisance Control Program (ANC).

SB 393: The repeal of Part 26, Environmental Science Advisory Board (ESAB).

Although the use of ESAB has unfortunately not been unitized by EGLE in recent years, this board has played an important role in the past researching invasive aquatic plant treatment protocols in Michigan. As an example, ESAB has worked with the Army Corp of Engineers to determine a safe, selective and effective protocol for the use of an herbicide "Fluridone". This protocol is still utilized by ANC permitting guidelines. The value of ESAB has been critically important to invasive species control.

SB 394: The Repeal of Sections 1313 through 1317 of Part 13 (permits) of NREPA.

We are not certain if the repeal of these sections would have an impact on the Aquatic Nuisance Control Program. The ANC permitting is under Part 33. Currently under Part 33, the ANC program has created efficiencies that allow ample permit review time and the approval of permits in a timely manner. Although no rule changes have taken place in many years, the ANC program has implemented dozens of conditions within ANC permits to ensure public safety, ecological balance and property values. The Michigan ANC permitting program and approval process is significantly more detailed, comprehensive and rational than most states within the USA. Our concern is that the passing of this bill would create shortfalls when the current program works.

If you have additional questions please contact

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