

From: [Jensen, Kimberly](#)
To: [Jensen, Kimberly](#)
Subject: FW: Act 57 ANC StudyCommittee
Date: Monday, October 16, 2023 5:33:06 PM

From: [REDACTED]
Sent: Monday, October 9, 2023 10:19 PM
To: ANR - WSMD Lakes <ANR.WSMDLakes@vermont.gov>
Subject: Fwd: Act 57 ANC StudyCommittee

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I am resending my comments as the above website was not available at the time of my initial sending.

Having watched the video from the past meeting, I have the following additional comments:

-Given the limited time available to complete a report, I would hope the committee will focus on the permitting PROCESS. If it was working well, there would not have been bipartisan support for H31 and this study committee would not exist.

-While the DEC reps (Ms. Jensen and Mr. Reed) should be commended on the effort to bring other members up to speed with 20 years of permitting history, I do not feel that a comparison of ProcellaCOR to SePRO's previously marketed herbicides is good use of the committee's time. As long as there is a market for such products, the manufacturer will continue to formulate and promote them. (It will likely be decades before we can truly have an informed conversation regarding the benefits and risks of this newest product, particularly in regards to effects on humans and other nontarget species.)

-I continue to be disturbed by the statements made by DEC regarding an "increase in native plant species" following ProcellaCOR use. I have read the report upon which this statement is based and have numerous questions regarding the methodology used to collect frequency of occurrence data and the validity of the assumptions. Is there comparative data on DASH, a non chemical alternative?

-A permitting process including public comment BEFORE formal filing of an herbicide application could have saved the ANR/ DEC considerable time and money over the course of the past two years. Given the scarcity of money to fund Greeter / AIS patrols at all boat launch sites, this is a valid concern.

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: September 28, 2023 at 4:32:46 PM EDT
To: Kimberly.Jensen@vermont.gov, asheldon@leg.state.vt.us, cbray@leg.state.vt.gov, sarah.owen@vermont.gov
Subject: Aquatic Nuisance Control Study Committee

Dear Members,

It is unclear to me to what degree the public will have access to and input in the work of the study committee. I hope consideration will be given to the following:

1. Who gets to apply for a permit? Is there any verification by the ANR/ DEC that the applicants are accurately presenting themselves? Example: While the Lake Bomoseen Association board of directors may claim to represent property owners and lake users, the LBA's current membership is only 130 (down from a one time high of 450-500 members) At best they represent 10% of lake property owners and a small fraction of lake users. The LB Preservation Trust is four self appointed individuals. (They do not have members.) Their function appears to be to provide anonymity to large donors while choosing which projects they wish to fund. Neither group makes meeting minutes available to dues paying members or the public.
2. Is there a compelling NEED to treat the specific body of water with an herbicide? Is this something a group WANTS to try or is there overwhelming data supporting the NEED for chemical treatment to either protect public health or prevent urgent, imminent ecological harm?
3. Does the permitting process give equal consideration to keeping a lake herbicide free; providing opportunities for further research and avoiding unforeseen consequences to non target species?

Thank you for your consideration.

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[REDACTED]
[REDACTED]
[REDACTED]