From: ANR - WSMD Lakes
To: Jensen, Kimberly
Subject: FW: Act 57 ANC Study Committee
Date: Monday, November 13, 2023 10:08:17 AM
Attachments: Act57 ANC Study Committee.docx

Thank you,

Kelcie Bean (she/her)

You may now submit permit applications, compliance reports and fee payments through our online form to expedite its receipt and review: ANR Online Intake Form

VERMONT

Kelcie Bean (she/her), Environmental Technician
Vermont Agency of Natural Resources | Department of Environmental Conservation
Watershed Management Division | Business & Operation Support Services (BOSS)
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802-490-6195 (o/c) | Kelcie.bean@vermont.gov
http://dec.vermont.gov/watershed

The Agency of Natural Resources supports telework, and I work primarily remotely. I am available to connect by phone and email.

Public Records Statement: Written communications to and from state officials regarding state business are considered public records and may be subject to public scrutiny.

From: [redacted]
Sent: Sunday, November 12, 2023 7:44 PM
To: ANR - WSMD Lakes <ANR.WSMDLakes@vermont.gov>
Subject: Act 57 ANC Study Committee

Please find attached my comments on the use and benefits of ProcellaCOR EC on Lake Beebe in Hubbardton, Vermont.

[redacted]

November 11, 2023

Dear Act 57 ANC Study Committee Members:

I am writing to you today to provide input into the benefits of ProcellaCOR EC, used to control EWM in the Vermont body of water, Beebe Pond, that I reside on.

While my secondary education is in the sciences and I have taken my mandatory biology and botany courses I am in no way an expert, as many who have joined this controversy, profess to be. My background does, perhaps, allow me to digest all the data (and there were lots since ProcellaCOR EC has been used for eight years in the US) and understand all the mathematical conversions of PDU to ppb, mg/L to ppb, etc. more easily. I have read the manufacturer's ProcellaCOR EC data sheet, various studies data, FOVLAP and DEC information and all the Annual Reports from Solitude Lake Management relative to Lake Beebe, but my input is purely observational.

My husband and I have owned property on Beebe Pond for over twenty years, so we have been here through the use of benthic barriers (which did not work), the year the lake was treated with Sonar AS (which worked but killed lots of native plants, too), the many years of DASH (which became prohibitively expensive and was simply a seasonal fix) and finally the treatment with ProcellaCOR EC. Our property includes 110 feet of shorefront. The water depth slowly increases for about twelve feet from the shore, before it quickly drops off. We have aggressively and consistently hand pulled EWM from our waterfront, taking care to remove all plants and their roots. We have gathered floating parts and pieces of EWM, to destroy, from our waterfront on a daily basis.

In 2019, our south western cove was dense with EWM. The plants had reached to the top of the water by late June and continued to thicken and expand throughout the 2019 season. It was terrible, and difficult to even kayak through. We had to hand pull an opening to even get out to deeper water. It was certainly not fun to try to swim through to get out to our float. We saw fewer fish from our dock because the cover was so dense. So, it definitely affected our recreational use of the lake.

In 2020 our cove was one of the limited littoral areas to receive our first application of ProcellaCOR EC. Within four weeks of application, the EWM had begun to bend over and die back. It was great to see fish near our dock again. It was nice to look across the cove and see water instead of weeds. We continued to spend time harvesting any floating pieces and parts of EWM that would land on our shorefront and hand pulling to try to further clear our waterfront.

In the Spring of 2021, we noticed two bass beds off our dock and waited to see if the EWM would emerge. The lake received the second application of ProcellaCOR EC. We were excited to see that the ProcellaCOR EC appeared to have decreased the EWM significantly. The water was clear, the native plants were growing, the fish were back around the dock and we even saw a few crayfish. We noted that a muskrat had wintered at one point on our waterfront and by midsummer the bullfrogs were audible. The songbirds were numerous, the Osprey, Blue Heron and Bald Eagle were around more, perhaps because it was easier to see prey in the less congested water, and a loon even appeared to be staying on

the lake. Another new occurrence to us were the appearance of large schools of fry, which we had never seen on the lake before.

In the Spring of 2022, we saw even more bass beds off our dock. The water was so clear. The fish came closer to shore as the water warmed up. We again saw more and larger crayfish along the shoreline. We saw water snakes and turtles in the lake. The EWM looked like it had increased a bit but we knew we were in the littoral zone to be treated this summer and if the first two years had been so successful, we had high hopes for the future. All the other wildlife returned around the lake and we had more than one bullfrog this summer. About this time we also started hearing all the false information about ProcellaCOR EC and it being a poison and toxic to EVERYTHING. I shared our observations with a number of people but they didn't seem to be interested in any of the science and data. Their lake treatment is secondary to my concerns, or so I thought, but it seems that one individual who knows how lobbying and the legislature (H.31) works, was able to further complicate the process and jeopardize our ability to control EWM on our lake.

This year, 2023, we were hopeful that logic would take hold and usage of Procella COR EC already permitted would be allowed to continue, especially since a hybrid has now been detected in the lake and should be aggressively addressed. The lake is crystal clear and more bass beds appeared this Spring. All the wildlife reappeared and appear to be healthy. My Grandkids assure us the fishing is great! They are also happy not to have to swim through a forest to get out to our float. We still hand pulled some EWM and there were still fragments to be removed from the lake. However, the lake was not treated this year and that was quickly evident in our cove. By the end of the season many shallow sections of the cove have dense growth and we have had to spend many more hours hand pulling near our shore.

Full disclosure: my science degree is in Pharmacy. I have been a Registered Pharmacist for nearly fifty years and served on the Vermont Board of Pharmacy for eleven years. I recognize the importance of committees. You do all the work. You often provide reason, in a politically charged environment. I have to say, from a scientific perspective, I am confused that Vermont only allows a below recommended PDU to be used and only a small percentage of the affected littoral zone to be treated per application. To use a medical analogy from my profession; that is like giving a patient a subtherapeutic dose of an antibiotic for a small portion of the recommended duration of therapy and expecting a favorable outcome. No wonder we have hybrids.

Thank you for your consideration. If you have any questions, feel free to contact me.

Sincerely,

[redacted]