

Town of Ticonderoga

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February 10, 2011

Dear Eagle Lake Resident,

This letter is being sent to update you on the status of our milfoil eradication project and to seek your support in having the Towns of Ticonderoga and Crown Point apply, to the Department of Environmental Conservation ("DEC") and the Adirondack Park Agency ("APA") for permits to treat selected areas of Eagle Lake with the aquatic herbicide Renovate OTF.

For the past several years, the Towns, with the assistance of the ELPOI, were under an informal agreement to be the applicant and administrator of several grants and applicant for the required hand removal permits. While these efforts helped put a dent in the milfoil, it is cost prohibitive to achieve the desired results through continued hand harvesting and matting. Treating selected locations with Renovate OTF should allow us to knock down the large beds, leaving only trace amounts of plants that could viably be contained through later hand harvesting. Both towns are therefore considering making an application to the DEC and APA for the necessary permits. To do so it is necessary for the Towns to, by resolution, become Lead Agent. As Lead Agent the towns will complete and submit the additional necessary permits, be responsible for the hiring and directing of contractors and provide notification to lake and town residents.

Plans for tackling the worst patches are to seek permits for the use of the herbicide Renovate OTF (On Target Flake) active ingredient Triclopyr for "site specific" application. Two specific sites are currently under consideration: one is the area between Rt. 74 and Foxes Island and the other is the underwater pinnacle located on the center of the north shore of the lake. These two test locations offer opportunities for demonstrating that Renovates fast absorption by milfoil, short half life and selectivity can make it successful in various settings. The Fox Island site is reasonably contained with limited water movement. The other is a more open water setting. The Fox Island site has large beds of milfoil growing at both the east and west ends of the island and extensive amounts of scattered plants growing on the south side. Native vegetation in this area remains diverse and strong, but is being encroached upon by the milfoil. The pinnacle site is several hundred square feet of solid milfoil growing in waters between 15 and 25 feet. Water at both locations beyond the milfoil quickly drops to 30 plus feet.

For several reasons, the previous efforts of hand harvesting and matting, while effective on small patches, are not appropriate or cost effective in large dense beds or locations with underwater obstructions. Hand pulling is extremely time consuming, has no assurance that all of the root stock from individual plants can be removed and requires multiyear follow-ups. Matting while effective in killing milfoil also kills everything else under the mat and is not an environmentally responsible removal method in mixed vegetation areas. Effective matting would also require a costly investment in several hundred thousand additional square feet of mat beyond what is currently in the lake to make a dent in the current milfoil beds. It is also time consuming to deploy and remove. Moreover, significant amounts of underwater debris in several of the beds in Eagle Lake make it unsafe for divers to access for hand removal or matting.

Costs for hand removal by divers and matting are \$12,000 to over \$15,000 per acre. The cost for treatment with Renovate, without the use of curtains, is \$900 to \$1,500 per acre. Mapping of Eagle Lake has shown that an area of some 50 -75 acres requires herbicide treatment to effectively tackle the infestation. This is as a result of combining closely spaced beds, treating entire bays with moderate milfoil growth mixed with dense native vegetation making locating milfoil difficult and often leaving many plants behind and providing a buffer zone around patches. With the DEC reimbursement of funds expended against the Invasive Species Grant in Crown Point's "milfoil account" a significant amount of this milfoil could be treated. This would include treatment of the two sites described and additional sites as later permits might allow.

We are still discussing whether our proposed treatment plan will include the use of site specific herbicide containment curtains. We understand that almost all lakes successfully treated under DEC permits outside of the Adirondack Park have

not been required to use any curtain. However, curtains were used during the recent treatment at Lake Luzerne this past summer. Lake Luzerne was the first lake treated within the Adirondack Park and the use of curtains was specifically required by the APA. The favorable attributes of shallow water, short distance across the area that was curtained, readily available anchoring points on both shores, and ready access to the lake, via the public boat launch and beach, for deployment meant that use of curtaining was not cost prohibitive. Because of Eagle Lake's greater depths and steeper slopes, curtaining in Eagle Lake would be much more expensive. Additionally, several DEC permitting staff and licensed herbicide applicators that have looked at Eagle Lake milfoil have indicated that the inclusion of a curtain into a treatment plan for Eagle Lake will not provide any benefit. Therefore, we are strongly considering proposing a treatment plan that does not employ the use of curtaining, but we welcome your input on this matter.

Application of Renovate to Eagle Lake would be by contract with a state licensed applicator and would take place as early in the growing season of milfoil as practical. Application at this time would minimize any negative impact to native aquatic vegetation and minimize any hardships, caused by water use restrictions, to lake residents. Reviewing Lake Luzerne's 2010 post herbicide plant survey showed very limited and only temporary impact on native plants. Lake Luzerne included 1 plant that is on the NYS rare plant list and 3 on the NYS threatened list and these remained post treatment. The summary for the plant survey indicated a decline in milfoil detection from 48% of sample sites in the treatment zone to 2.6% while native vegetation densities increased.

It is anticipated that lake water use restriction for Eagle Lake would be similar to those imposed on Lake Luzerne and that these should present only minimal hardship to lake users. Lake Luzerne's restrictions included;

- Restricted use of lake water for any purpose for 3 hours post treatment, after this time recreational use for boating, swimming and fishing can resume.
- Prohibited the drinking and use of potable water intakes until laboratory analysis reveals triclopyr concentrations are 50 parts per billion (Ppb) or less. (Lake Luzerne removed this restriction approximately 6 weeks after treatment. Lakes treated without curtains have often been able to remove this restriction sooner as a result of lake wide dilution.) Eagle Lake water is not tested for drinking and using it for such is done at one's own risk.
- Restricted use of lake water for irrigation of established tree crops, row crops and other broad-leaf plants for 120 days after treatment or until laboratory analysis results reveal that triclopyr concentrations are 1 Ppb or less. (Lake Luzerne removed this restriction approximately September 1, 2010 well in excess of the 120 days and beyond the anticipated time for laboratory analysis to reach 1 Ppb as the restriction did not affect any lake residents, and costs incurred for testing for this level could be greatly reduced by the extended time.)

Additional details related to Renovate, its use, pre and post lake treatment plant surveys and previous milfoil removal efforts in Eagle Lake can be found at www.Eaglelake1.org

It is important to note that the purpose of this letter is only to ascertain whether you are in favor of having the town make an application to both the APA and DEC for permits to treat Eagle Lake. If the application is made, both the APA and DEC require that all property owners must be notified of the permit application. If the use of Renovate in Eagle Lake is agreeable to you and you support its application with the Towns as lead agent it is not necessary to respond to this letter, although you may always submit a letter of support. Lack of response is considered to be consent for the project to move forward. If you disapprove, please contact Ms. Deb Malaney, Ticonderoga Supervisor in writing by March 4, 2011. Please explain your concerns so that we may address them. This contact must be made by March 4, 2011.

The Officers and Board Members of the ELPOI as well as the Officers of both Towns strongly support moving forward with a permit application with the Towns as Lead Agents, and we respectfully ask for your support.

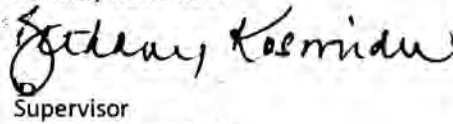
Very Truly Yours,

Debra Malaney



Supervisor
Town of Ticonderoga

Bethany Kosminder



Supervisor
Town of Crown Point

Andy Belkivich



President of ELPOI
For the ELPOI Board