

Town of Ticonderoga

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Eagle Lake Residents,

June 6, 2011

This letter is a follow up to the Eagle Lake Milfoil Project Interest Survey sent to you in February. First, we want to thank you very much for your feedback. Many positive comments were received and four residents expressed concern. Second, we would like to assure everyone that the survey letter sent was just that, a survey. Its purpose was to gauge initial Lake Resident support for, and any concerns associated with, an herbicide application before the Towns of Ticonderoga and Crown Point entered into a more formal dialog with the State agencies responsible for the permitting--the Department of Environmental Conservation ("DEC") and the Adirondack Park Agency ("APA").

With the general consideration of lake Residents to be in support of moving forward with the permit application process, we will continue with our discussions. While the DEC and APA regulate the application of aquatic herbicides, they do not design the treatment plans themselves. Therefore, the first formal step in the permit process is to prepare a treatment plan and submit it to the agencies for approval. As this process is completed, your input again will be welcomed. Specific details related to the project will continue to be shared with lake residents via mail, email and the Eaglelake1.org website as they become known. When the APA receives an application, it too will notify lake residents by mail and ask for comments and seek approval. Most treatments are done in the early summer season. Because of this and the fact that it will require several months to prepare a formal treatment plan and obtain approvals from the agencies, the plan that is developed will propose a treatment for summer 2012.

In response to one of the recent articles that appeared in the newspaper regarding the proposed project, a representative from the APA contacted the Town of Ticonderoga and expressed general interest and support for this project. Nevertheless, the APA expressed some hesitancy with regard to a project without curtaining, even though the vast majority of treatments in NYS have not employed curtaining.

We have asked ELPOI President Andy Belkevich along with Milfoil Project Coordinator Rolf Tiedemann to put together a reply to address, as best as possible with today's information, the concerns expressed by residents. A copy of that letter is attached. Please feel free to contact either Town Supervisor, ELPOI President Andy Belkevich, Project Coordinator Rolf Tiedemann or any ELPOI Board Member to further discuss this project as planning continues.

So that we may have a greater understanding on how milfoil affects your individual lake use/enjoyment and impacts the local economy and property values, we are asking that you take a moment and send one or both of us a note, either via mail or email, describing how you and your family's personal use of the lake is impacted by this invasive. This information will be helpful in working with the APA and other interested parties.

Debra Malaney

Bethany Kosminder

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Eagle Lake Property Owners, Inc.

c/o 11 Deepwood Drive, Ticonderoga, NY 12883

A 501 (c)(3) not-for-profit organization

On the web @ www.eaglelake1.org

Officers;

President – Andy Belkevich
Vice President – Steve Stubing
Secretary – Mary Loose
Treasurer – Rin Fraize

Board of Directors;

Chris Hyde
Ann Patterson
Stephen Phelps
David Williams
Lloyd Burroughs

Greetings Everyone,

June 6, 2011

Thank you to all lake residents for taking the time to consider the recent Eagle Lake Milfoil Project Interest Survey. The survey letter was generated to provide lake residents with some general concepts about how a treatment plan may be designed, and to determine the level of support for moving forward with the actual submission of a permit application request to the Adirondack Park Agency (“APA”). The results from the survey will help guide the Towns, the ELPOI Board and the ELPOI milfoil project team as they continue to move forward with assembling a proposed treatment plan and permit application for milfoil control on Eagle Lake.

This letter is being shared with you at the request of both Town Supervisors as a way of addressing the concerns/questions raised by those responding to the survey. The information we are sharing is the result of our research into the aquatic herbicide Renovate OTF and its use in other lakes and ponds.

SCOPE OF TREATMENT PLAN. Some concern was expressed about whether our proposal should include only two “test locations” or all significant infestations of milfoil in the lake. Over the past several years, representatives from the APA have expressed concern about a larger treatment plan that may not employ curtains. This led us to consider proposing a smaller project without curtains in the first year, with the goal of conducting a larger treatment the following year. From an economical and invasive plant management perspective, the “go smaller” approach is an expensive, if not wasteful use of our finite resources. Further, considering the magnitude of our lake’s invasive problem, the test plot approach might be of minimal benefit to our overall situation and make no progress to a long term solution. Therefore, it is the desire of the milfoil management team to “go big” right from the start, but the scope of how big will be determined by the APA.

CURTAINS. Considering the APA’s initial hesitancy regarding a treatment plan without curtains, some concern was expressed about whether we should propose a plan that does not utilize curtains. For several reasons, we think a treatment plan without curtains makes sense. First, our research indicates that neither the Federal government, any other state or governing agency nor the product manufacturer requires curtain usage. Second, our research turned up only two instances where curtains were used in other NYS treatments--one of which was at the insistence of the APA--and no instances in other Northeastern states where curtains were used. Third, use of curtains would be cost prohibitive in Eagle Lake. No commercially available curtains are tall enough for the deeper waters of Eagle Lake. Therefore, curtains for Eagle Lake would need to be custom built, at greater expense, in order to be usable at the water depths where our plants occur. This coupled with the sheer length of curtain required to surround or cordon off Eagle Lake’s sizeable beds would quickly result in a costly treatment plan that exceeds our financial resources.

FINAL DETAILS. How the final treatment plan will look will depend on the economics of our situation and any conditions imposed by the DEC and APA during the permit approval process. As such, this makes providing project specific details difficult prior to the permit's ultimate approval or denial. We will, however, post as much of our proposed treatment plans and any feedback from the DEC and APA on our website as is possible.

ALTERNATIVE CONTROL METHODS. Concern was expressed about whether herbicide control would be more effective than other previously used control methods. Several years ago, we were instructed by the APA representatives that we must perform hand harvesting and matting before any proposal to utilize an herbicide would be considered. For several years thereafter, we conducted hand harvesting and employed the use of mats to kill milfoil. On a per acre basis, these efforts were costly and had localized success but limited impact on the overall spread of milfoil. Therefore, we still continue to see an herbicide treatment as the most economical means of bringing the milfoil infestation to a manageable level.

SPECIFIC WATER RESTRICTIONS. The anticipated use restrictions provided in the survey letter were those that were imposed upon Lake Luzerne. Specific water use restrictions as applied to an Eagle Lake herbicide treatment and the posting of those requirements would be determined by both the DEC and APA.

POTABLE/DOMESTIC WATER ALTERNATIVES. Some concern was expressed with regards to the availability of alternative sources of potable water (i.e., drinking water) and domestic water (i.e., personal washing, cloths washing, flushing toilets, etc.) while residual concentrations of herbicide dissipate. First, Eagle Lake water is not tested or approved for "potable" use. However, during the time of water use restrictions the Town of Ti will offer, via a hose located at the chlorination station, access to the Town's Gooseneck Pond water supply for lake residents to collect for their personal use. Second, after the initial 3 hour post-application water use restriction is lifted, there are no further restrictions placed on the use of water for "domestic water" use. The DEC indicates that there is little to no risk associated with the use of post treated water for domestic purposes. Specific testing is however required by the DEC and APA post treatment to determine specific residual herbicide concentrations and to determine when restrictions can be removed.

IRRIGATION WATER ALTERNATIVES. Concerns related to the need for irrigation water will be addressed within the confines of the permit application as required by the permitting agencies. We will work with the Towns to determine the feasibility of placing a tank of pretreatment water, along with a pump, on any lake properties that have a need for irrigation water. Also, our research indicates that the residual herbicide concentrations do not affect all plant species.

SEPTIC SYSTEMS. Concern was expressed with regards to how Renovate treated water would effect any onsite waste water treatment system (septic/cesspool). Sara Miller, Sepro Regional Product Specialist, has advised that there have been no observed impacts in prior treatments. She indicated that, in the absence of light, such as in a sealed septic system, Renovate breaks down by both photo degradation and microbial action. It is expected that the break down would take place at a slower pace. *Because of the importance of photo degradation and a decrease in the size of microbial populations with soil depth, triclopyr located deeper in the soil column (>15 cm) degrades more slowly than residues near the surface (Johnson et al. 1995a). Weed Control Methods Handbook, The Nature Conservancy, Tu et al.*

SWIMMING. Copied below is information regarding swimming restrictions from a guidebook published by Washington State. (See below for more information about this publication.)

10. Is it safe to swim or play in the water following the herbicide application?

There are no swimming restrictions on the Renovate 3™ label following application of triclopyr to water. This means that the federal EPA considers the treated water safe for swimming. However,

to impose an additional layer of safety to swimmers (due to potential for eye irritation) the Washington Department of Ecology is imposing a twelve hour swimming restriction in Washington after treatment with triclopyr. Washington State Department of Ecology recently contracted for an independent scientific assessment of triclopyr safety including this question of a swimmer's exposure. The most conservative scenario considered was a six-year-old who swims for three hours and inadvertently swallows 150 ml of water from a lake treated with the maximum allowable rate of triclopyr. The estimated amount the child would absorb in this scenario was still more than 100 times less than the daily dose animals were fed over their lifetime with no observable adverse effects. Washington State Department of Health (DOH) has reviewed the data and agrees that skin contact with treated water at the dilute treatment concentration is unlikely to result in any adverse health effect in people. Triclopyr products are concentrated when initially injected into water during an application so, as a precaution, DOH advises people to avoid contact with water in treated areas for twelve hours following an application to allow the herbicide concentrate to disperse and reach the dilute treatment concentration.

FUNDING. Concern was expressed about both short and long term funding sources and expenses. Last summer (2010) no dive operations were performed in order to conserve funds while the herbicide permit possibilities were being explored. During this time, final arrangements were made to secure the State's portion of their obligation for matching funds. Currently, the State is in the process of processing the final paper work to release the \$55,000 in promised matching funds related to the Grant. These funds will be deposited into, and be available for use, from the Crown Point milfoil account. The balance in this account prior to the State's deposit is \$500.00. There is approximately \$3,500.00 in prior incurred expenses that need to be paid once the deposit is completed. This summer you can expect to see all benthic mats presently on the lake bottom removed, and not relocated. This meets our final Grant obligation. Costs associated with this process are expected to be \$5,000.00. There are no current plans for their future re-use at this time, and as such the mats will be recycled and disposed of. The cost associated with this activity is estimated at \$500.00, as 95% of the material is recyclable and some material even has a scrap value which will offset some of the actual costs of this activity. The cost for mat removal and disposal was previously planned for and will be covered by the Grant's matching funds distribution.

A balance of approximately \$46,500 of those matching funds will remain to cover the currently anticipated costs for an herbicide permit application submission and a future first time herbicide treatment, free and clear of any further Grant restrictions or obligations. As for the receipt or anticipation of any additional funds/funding in the future, State resources are currently being explored and there have been several offers of additional small to significant donations should a permit, or future permits, be secured. A per acre Renovate treatment cost without curtains, as reported by other lakes treated with Renovate, ranges in the \$800.00 - \$1,500.00 range, depending on lake access, herbicide treatment concentrations, water depth in the treatment site and the cost of pre and post treatment water testing and plant surveys. The size of the two proposed "spot" sites, E and I, are 10.6 and .7 acres respectively. If a whole lake spot treatment can be permitted the total area in need of treatment is approximately 75 acres, this includes some buffer space around each of the patches.

A map and table showing this area is included. It can also be found here http://eaglelake1.org/html/documents/gps/proposed_herbicide_locations.shtml

It should be noted that initial plans call for treating Eagle Lake in early spring (shortly after ice out). A treatment at this time of year would minimize the impact to all residents' use of the water because the lake would potentially be too cold for swimming, many seasonal residents would not yet be at the lake and the need for irrigation water would be at a minimum.

TIME FRAME. We expect that the permit application process will be ongoing for a period of time, it is important that we continue to hear your thoughts and concerns as we move forward so that we may represent you in this process. We hope to bring this matter to a conclusion by spring of 2012, in time for

any permit-approved herbicide application. So do contact us. Your words and thoughts are most important for our consideration for moving forward. All letters of concern and support will be included in the permit application, so that your responses will not have to be duplicated to the agencies involved.

ADDITIONAL RESOURCES.

A map showing the suspected Eagle Lake non specified personal water intakes is located here
<http://eaglelake1.org/html/documents/maps/maps.shtml#waterintake>

Several documents related to the herbicide triclopyr, its toxicology and use can be found here
http://eaglelake1.org/html/environmental_issues/control/herbicide.shtml

Several lakes in the northeast have successfully used renovate to treat milfoil. Several documents related to their pre and post treatments are located here
http://eaglelake1.org/html/other_lakes/other_plant_surveys.shtml

Washington State produced an excellent and very detailed "frequently asked questions" booklet that has become in some respects the industry standard for answering questions related to the use of Renovate. A full copy of it can be downloaded at
http://www.ecy.wa.gov/programs/wq/pesticides/final_pesticide_permits/noxious/triclopyr_faq.pdf

SUMMER MEETING. Additional information will be available at the ELPOI July 9, 2011 annual meeting. The meeting will be held at the Chilson Community Center at 10:00 am. All are invited. (Note: All lake residents may speak and vote on matters directly related to the milfoil project, but those that have not paid dues to become an ELPOI member are not eligible to vote on ELPOI specific matters.) Any lake resident wishing to become a member may do so prior to the commencement of the 10:00 am meeting time; application forms are available on line at <http://eaglelake1.org/html/membership.shtml>

Andy Belkevich



President of ELPOI
For the Board
mountainman4ever@hotmail.com

Rolf Tiedemann



Milfoil Project Coordinator
Eagle Lake property owner/resident
camptouchstone@yahoo.com

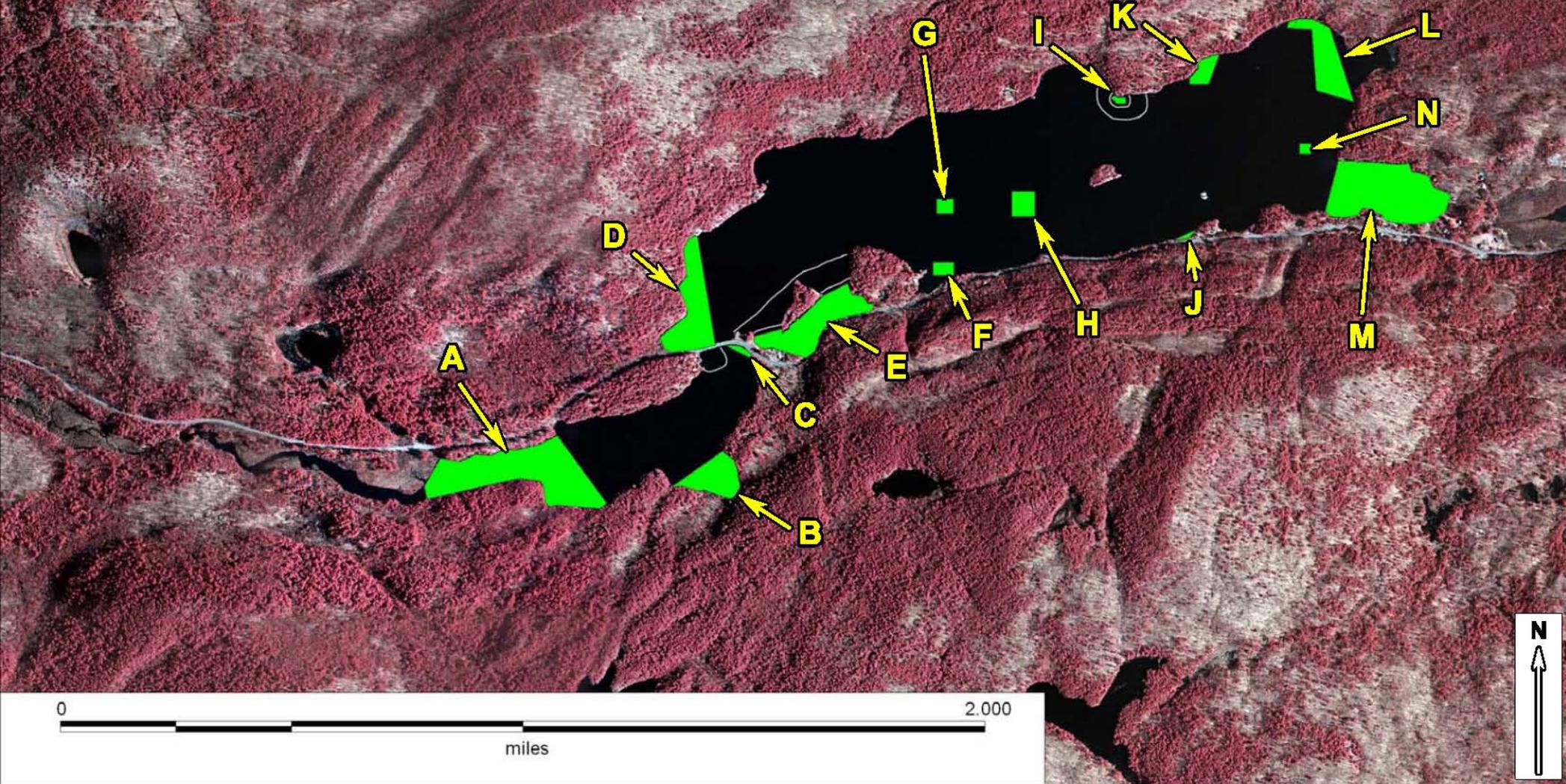
PS. A copy of this letter with active links is located on the Eaglelake1.org website click on the ELPOI radio button and look for a thumbnail image of the Supervisors letter.

Proposed Herbicide Use Areas- 2003 Milfoil Location Overlay
By Michael Tledemann
1-2010

Proposed locations based on the 2003 milfoil baseline survey and observations during removal efforts summer 2008-09

- Green Areas: indicate proposed treatment locations.
- Red Squares: indicate milfoil locations as of 2003
- White Lines: indicate proposed water test locations at ~50 and 500 feet from the treatment zone

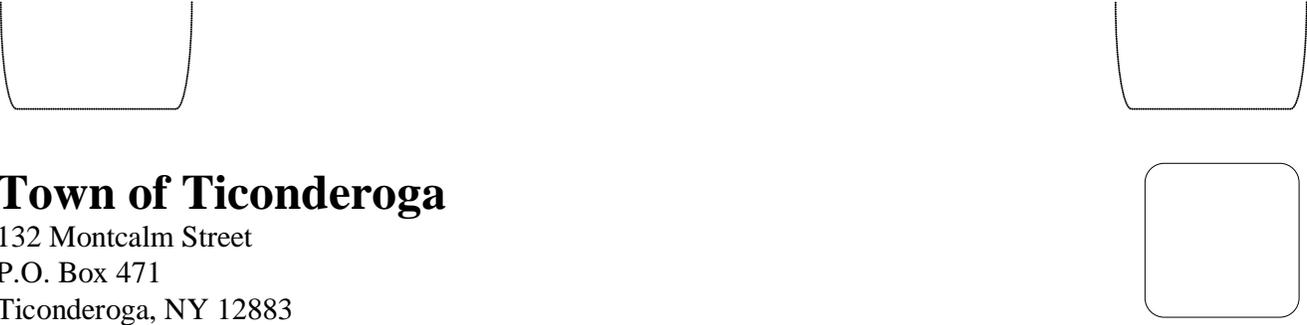
Please see associated data table for more information



Proposed Herbicide Curtain Locations Information
 By Michael Tiedemann
 1-2010

Proposed Herbicide Treatment Location	Surface Area (In Acres)	Perimeter Distance (In Feet)	Length of Curtain Required (In Feet)	Shoreline Length in the Treatment Area (In Feet)	Overall East/West Width (In Feet)	Overall North/South Height (In Feet)
A	20.30	5200	1000	4200	2010	840
B	4.80	2050	600	1450	790	550
C	0.60	680	300	380	280	150
D	7.50	3430	1300	2130	620	1340
E	10.60	2580	900	1680	1350	850
F	1.00	750	750	0	240	140
G	1.30	800	800	0	200	200
H	1.90	1150	1150	0	295	280
I	0.70	700	540	160	160	190
J	0.50	600	360	240	260	120
K	1.80	1120	720	400	340	340
L	6.70	2750	2400	350	690	930
M	17.00	3800	600	3200	1440	730
N	0.30	500	500	0	110	140
Total	75.00		11920	14190		

Note:
 Treatment locations "A", "D", and "M" show signification treatment volumes beyond the 2003 baseline study locations. This is due to observations by experienced divers in 2008-09 which indicated significant milfoil expansion. See Jacques "Eagle Lake Depths, Milfoil Beds, and Matting - Ti Bay 2009" for 3 selected beds that were resurveyed at treatment site "M."



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Eagle Lake - reply to Feb. milfoil project survey