
Subject: Fwd: Renovate public comments

From: Leland Loose (leland.loose@gmail.com)

To: Jeffb@foremostcaterers.com; fredjadams@hotmail.com; CAMPTOUCHSTONE@YAHOO.COM;

Date: Wednesday, November 6, 2013 10:35 AM

Fyi, what I sent in regarding APA requests for public comments for Renovate.

----- Forwarded message -----

From: **Leland Loose** <leland.loose@gmail.com>

Date: Wed, Nov 6, 2013 at 8:43 AM

Subject: Renovate public comments

To: ljsurpre <ljsurpre@gw.dec.state.ny.us>

Cc: Chris Hyde <cdhyde1@gmail.com>

Dear Ms. Surprenant, I am responding to the request by your agency for public comments regarding the use of Renovate to be used for the control of invasive species such as Eurasian milfoil, and specifically in Eagle Lake. I am a summer resident of Eagle Lake and have watched over the years as milfoil has become more and more invasive to the point of restricting use in numerous areas of the lake. I do feel that over time it will have an economically deleterious effect on the property values of the lake and hence a diminished source of income for the surrounding towns of Schroon Lake as well as Ticonderoga. As you know Renovate was first registered for the control of aquatic weeds, including milfoil, in 2002. This EPA approval has been followed by the registration of the product, Renovate 3, in all of the continental United States (excluding Alaska). A new formulation of the product has also been approved and released and has been registered in all states except for Alaska, Puerto Rico, Hawaii, Wyoming and the District of Columbia. Since the EPA approval in 2002 and its registration and use in the approved states, there have been no withdrawals of the registration of the product nor have there been any restrictions placed on its use in the registered states. More importantly, during this period of time there have been no documented adverse effects of Renovate when used according to the approved label directions. As you have stated, Renovate is specific for the targeted plants, has a short half-life and has shown robust efficacy as well as safety. Equally important, it has not shown any adverse effects of non-plant species in the used areas. As you may be aware, we have used hand harvesting as well as benthic mats in an attempt to control milfoil in Eagle Lake. The effects of this type of control have been transient at best. More importantly, since Eagle Lake has a large and deep surface area such types of control are actually not very practical or useful and, in fact, due to the depths, may not be safe to employ. I would urge that Renovate be approved for the control of milfoil in Eagle Lake. If you would consider, Eagle Lake may in fact be an ideal experimental lake since Rt. 74 passes over the Lake with a narrow bridge which essentially bisects the lake so that the narrow causeway could create a Renovate treated vs. a Renovate not-treated area of the lake with a curtain placed at the site of the causeway. I look forward to learning of your decision in this matter. Best regards, Leland

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