

Written Testimony given by Ross Ogilvie, Chair of the Salem Lakes Preservation Association (SLPA) Eurasian Milfoil Committee (EMC).

The invasive species Eurasian Water Milfoil (EWM) was discovered in Big Lake Salem in 2017. Despite SLPA's best efforts the lake has experienced exponential growth with the EWM infested area doubling roughly every 6 months. SLPA has employed mitigation methods including Hand harvesting, Bottom Barriers, Diver Assisted Suction Harvesting (DASH), totaling roughly \$6K in 2018 to \$32K in 2022. The EMC was formed in 2021 to study and recommend mitigation strategies to the SLPA board.

Some of what the EMC has learned during this period is as follows (Details in SLPA long term EWM Mitigation Plan on the Salem Lakes Preservation Website) :

- 1) EWM in Big Lake Salem cannot be controlled with our previous methods, Hand harvesting, Bottom Barriers, and Diver Assisted Suction Harvesting (DASH).
- 2) Using previous control methods Salem Lakes residents cannot afford to control this EWM exponential growth beyond this year.
- 3) After more than a year of study, the EMC has come to the conclusion that ProcellaCOR EC is safe and cost effective. EWM has proven to be especially susceptible to ProcellaCOR™ EC allowing for low application rates at 5.79 ppb, 12% of the EPA allowable dose and a brief presence within the water with a reported photolytic half-life of 1.68 hours.
- 4) This safety and effectiveness have been noted by other lake associations including Lake Iroquois with a lake treatment in 2021
- 5) From SLPA experience and contracts. The cost of ProcellaCOR treatment in Cost per Acre per year is roughly 1/5 of the cost of DASH, 1/10 the cost of hand pulling, and 1/13 the cost of bottom barriers.
- 6) SLPA cannot afford another year of mitigation using only Hand harvesting, Bottom Barriers, and Diver Assisted Suction Harvesting (DASH) with the compounding costs as EWM continues its exponential growth.

SLPA does have the support from the Derby Selectboard including significant funds toward the application of ProcellaCOR EC in 2023.

The SLPA ProcellaCOR EC application was received by the Vermont Department of Environmental Conservation on March 9th 2023.

SLPA does not support a moratorium to apply ProcellCOR EC application as it will cause an unaffordable delay in our plans to mitigate EWM from Big Lake Salem.