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23 February 2015

Conservation Commission
Groton Town Hall
173 Main Street
Groton, MA 01450

CC: Great Ponds Advisory Committee and the Groton Lakes Association.

Subject: *Proposed Sonar (fluridone) Application to Baddacook Pond*

Dear Concerned Citizens,

In its nearly 20-year history, SePRO Corporation has become a recognized leader in aquatic invasive species management throughout the United States and has supported a variety of multiple-year eradication programs for new Aquatic Invasive Species (AIS) infestations, with particular focus on both milfoil and cabomba. Sonar® Aquatic Herbicide (active ingredient: Fluridone) has been at the core of these efforts due to its low use rates and sustained contact that allow for economical and ecologically-compatible AIS management including eradication efforts focused on season-long management.

Examples of supported projects in MA, each of which has adjacent or downstream municipal wells, include:

- Spectacle Lake in Littleton, MA
- Neponset Reservoir in Foxboro, MA
- Dudley Pond in Wayland, MA
- Attitash Lake in Amesbury and Merrimac, MA
- Bartlett Pond in Northboro, MA

These projects represent diverse systems with multiple stakeholders' interests to consider: property owners, federally listed species habitat and, perhaps most importantly, human health considerations.

Human health effects have been extensively evaluated for fluridone since the molecule's initial aquatic registration in 1984. The US EPA, State regulatory agencies, local governments and many other stakeholders have recognized or acknowledged the safety of fluridone under labelled conditions of use. Tolerances have been established for indirect or inadvertent residues of fluridone, including its metabolites and degradates, in or on select irrigated crop commodities, and animals, intended for human consumption, that may be exposed through drinking water (CFR 40§180.420).



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Fluridone is permitted up to 150 ppb in potable water sources (i.e. drinking water reservoirs) although in-water rates are typically <10ppb for control. The MA EIS instructs applicators to use caution when applying within one-fourth (1/4) mile of functioning potable water intakes and not to exceed 20ppb; the proposed treatment and successful MA lake treatments followed these conservative guidelines. The current aquatic labels have no restrictions on recreational (i.e. swimming) or animal consumption use, following application at the maximum label rate.

Through responsible management and cooperation, Baddacook Pond can be effectively treated with Sonar and impacts of this invasive plant to water supply, fish wildlife, and recreation will be mitigated. SePRO is committed to responsible management and product stewardship and will continue to work with the State of Massachusetts and stakeholders to achieve this common goal.

Sincerely,

A handwritten signature in blue ink that reads "Laurent Mézin".

Laurent C. Mézin
Regulatory Affairs Manager