

February 12, 2007

Mr. Stephen E. Cotton, President
Foster's Pond Corporation
19 Pomeroy Road
Andover, MA 01810

Re: Proposed Fanwort Management Program for Foster's Pond - 2007

Dear Mr. Cotton:

The whole lake Sonar herbicide treatment performed in 2005 provided complete fanwort (*Cabomba caroliniana*) control during the year of treatment. In 2006, the Sonar herbicide treatment performed in the Glenwood Road Basin (Dug Pond) was similarly effective. Unfortunately, some regrowth of fanwort was observed in Foster's Pond by the middle of summer last year. The extent of the fanwort regrowth was documented by members of the Foster's Pond Corporation (FPC) in August 2006 and formally by Aquatic Control Technology (ACT) on September 13, 2006 (see Figure 1 attached). Most of the fanwort regrowth occurred in areas of the pond that were only 3-4 feet deep, had excessive accumulations (>2 feet) of soft sediments, and supported dense fanwort growth prior to the 2005 treatment. It is expected that the 2005 treatment program was unable to sufficiently exhaust the starch reserves in the root structures of these mature fanwort plants, which led to the regrowth seen in 2006.

As detailed in our 2006 year-end report (dated 11/29/06) the reinfestation of fanwort is already too extensive to be managed effectively using non-chemical techniques. Spot-treatment of 3 separate areas that total approximately 18 acres is recommended to prevent further expansion of the infestation and to prolong the benefits of the whole-pond treatment that was performed in 2005. Various elements of the treatment program are summarized in the following sections.

Treatment Areas

Total Surface Area: 18 acres (narrow canals adjacent to wetland areas and the outlet cove)
Average Depth: 3-4 feet (estimated)

Herbicide Selection

Sonar (active ingredient fluridone) continues to be the only registered aquatic herbicide that controls fanwort. Where only spot or partial-pond treatment is proposed for 2007, two time-release pellet formulations [PR (precision release) and Q (quick release)] will be utilized to insure sufficient exposure time is maintained. Some liquid Sonar [AS (aqueous suspension)] may possibly be used to supplement in-water concentrations.

Dose Calculations

Because the time-release pellet formulations will be used, it will be more difficult to moderate the fluridone concentrations in the water. Typically, no more than 20-25% of applied amount is detectable in the water column at any one time. This is expected to be even lower in Foster's Pond due to the soft bottom sediments. Three applications are anticipated. Floating limno-barriers may be used to help prevent movement of fluridone away from the treatment areas. The total concentration of fluridone applied will not exceed 150 ppb, but it is doubtful that concentrations above 20 ppb will ever be detectable in the water column. Exposure to low concentrations of fluridone will be necessary for 60-90 days to achieve control.

Application Methodology

Treatments will be performed by MA Commercially Certified aquatic applicators. Treatments will be performed from a 15 or 18 foot Airboat. The Sonar pellets will be evenly distributed through the treatment area using a calibrated, cyclone spreader mounted on the bow of the airboat. If liquid Sonar is needed, it will be diluted and injected subsurface through weighted hoses and a calibrated spray system.

Treatment Timing

Timing of the initial application will be determined following a pre-treatment inspection in early May. The primary factors that will determine the actual application schedule include the stage of plant growth and amount of outflow. Treatment would most likely be initiated between mid May and early June. The booster treatments will be performed approximately 3-4 weeks after the prior application.

FasTEST Monitoring

Monitoring Sonar concentrations following each application will be necessary to insure that the target concentration was reached and to guide the timing and concentration of subsequent applications. Sampling rounds will likely be required at 2-3 week intervals following each treatment. Samples will be collected by FPC or ACT and will be shipped via overnight delivery directly to SePRO (manufacturer of Sonar) for analysis. Results should be available within 48 hours of shipment, which will enable timely scheduling of booster applications.

Notification and Water Use Restrictions

Sonar herbicide has a favorable toxicology profile. The only use restriction listed on EPA Specimen Label for all three formulations is a precaution against using treated water for irrigation for a period of 30 days following each treatment. It can even be applied directly to potable (drinking) water sources. Although no restrictions on swimming, fishing or other recreational activities are required by the product label following treatment with Sonar, we have recommended – and the Andover Board of Health has approved – the following temporary water use restrictions: no boating, fishing, or swimming in the treated water on the day of each treatment. Accordingly, prior to all treatments, the shoreline of the basin will be posted with signs that warn of the temporary water use restrictions.

Additional Permits

This treatment program is subject to the Superseding Order of Conditions (DEP File # 090-0535); the Amended Special Conditions are attached to this letter. We will prepare and file for a site-specific License to Apply Chemicals (BRP WM 04), which is issued by DEP annually on a project-specific basis. Pursuant to Special Condition 12.19, a copy of this License will be provided to the Conservation Commission prior to treatment.

We trust that this information accurately summarizes the proposed spot-treatment of fanwort regrowth in Foster's Pond during the 2007 season. Of course do not hesitate to contact our office if you have questions or require additional information.

Sincerely,

AQUATIC CONTROL TECHNOLOGY, INC.



Marc Bellaud
Senior Biologist