

To whom it may concern,

It was brought to my attention, that claims regarding PLM's treatments on Houghton Lake have been noncompliant with the permit and/or in violation of a T&E (threatened and endangered) species on Houghton Lake and have further negatively impacted protected species, such as Wild Rice. Not only are these claims inaccurate, information is being taken out of context and without fact and being used to confuse the public and discredit the contracted firms of the Houghton Lake Improvement Board as well as the Houghton Lake Improvement Board itself.

Houghton Lake is managed under permit, ANC9804791, which has had site specific conditions revised (amended) since it was issued in 2019. Some of these revisions included the approval of SeClear G for treatment in the channel systems only. Each channel system has a specific map approval for isolation and use. SeClear G was treated for algae (including the nonnative, highly invasive macroalgae - SSW). SeClear G is 58.9% active, so of the 500lbs used over 2 years, less than 300lbs of that was active. SeClear G has as an additive to help remove Phosphorus from the water column, to help remove the food source for production as well and out of the 40 acres approved for use each year, 7.7 acres was treated in 2020 and in 2021, 5.75 acres was treated. The use of SeClear G had no negative impacts on macroinvertebrates nor did it violate the permit. The permit holds no T&E species and further, the rates used are within approved State and Federal label rates.

Additionally, amendments have been approved for the management in the middle grounds of Houghton Lake to use various products for the control of EWM. These revisions have been submitted post detailed survey work, completed by RLS, DEQ or EGLE, as well as PLM. Based on the plants PRESENT during these surveys, permit revisions were approved to manage the species present. Wild Rice, when present, was isolated for treatment. It is negligent to make claims that survey work by three independent parties was not accurate and/or these surveys make claims to ProcellaCOR negatively impacting the Wild Rice. On the contrary, the exact opposite was found. By properly controlling EWM, Wild Rice will have a fighting chance at survival within the Middle Grounds. It is further important to note that as an evolving ecosystem, many factors impact emergent plant growth within the Middle Grounds and to make claims without acknowledgement of such impacts of ice coverage, wave impacts, water height, plant growth, etc. is uninformed. Additionally, the Middle Grounds was not chosen by Wild Rice experts as a good location for re-establishment due to such listed factors.

As a lake manager, I work tirelessly to help educate riparian's and concerned citizens on aquatics, proper lake management using facts, science and in a transparent matter. It is very concerning when claims that lack merit, support and fact are made and further when they slow down or take focus away from a successful program that is working as a community to protect our resources. I urge all to continue to focus on moving this program and the fight against nonnative plants forward and to continue to protect Houghton Lake from the negative impacts of invasive, nonnative plants, algae and phosphorus pollution.

Respectfully,  
Bre Grabill

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