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September 24, 2008

Mr. Thomas R. Pokonosky
20100 Minnetonka Blvd.
Deephaven, Minnesota 55331

Dear Mr. Pokonosky,

This is an acknowledgement that we are in receipt of your letter of July 1, 2008 regarding the proposed rule changes by the Minnesota DNR concerning the management of lakeshore vegetation. We have been studying this rule and its anticipated effect on the use of aquatic herbicides to manage nuisance vegetation around the docks and lakeshore areas in water bodies in Minnesota. We are unaware of the science or technical merits of the proposed rule change, and were not consulted or involved in any discussions pertaining to them. Certainly the current rule of treating no more than 15% of the littoral zone has restricted the use of whole-lake treatments with products such as our Sonar *Aquatic Herbicide. There is no question that this proposed rule would further restrict the selection, potential costs and use of aquatic herbicides for use around shoreline areas. Many products are not very effective in small treatment areas due to increased dilution by untreated water. Rapid dilution of aquatic herbicides reduces the contact time with the target plant and decreases efficacy. The rules would result in greater risk of herbicide non-performance. Higher doses can be used to compensate for increased dilution, but result in increased cost. Limiting the size of treatment areas may also result in product misuse or encourage over-applying products in order to achieve effective results. Therefore, the proposed rules will limit your options for effective weed control.

SePRO's aquatic business is primarily driven by the use of selective herbicides to manage vegetation in broader-use applications for whole-lake or in treating larger areas within lakes. The primary reason is to ensure adequate contact time with the herbicide to the target invasive plants such as Eurasian watermilfoil and curlyleaf pondweed. In these situations, Sonar and Renovate* are excellent choices due to their selectivity and ability to systemically kill the target plants while minimizing impact to native vegetation.

It would appear that the new rule and the general philosophy of the Minnesota DNR is to utilize selective tools and management programs to target invasive plants, but ensure appropriate selectivity to the native plants to protect fisheries. We feel we have such products with Sonar and Renovate, whereby, either whole-lake or large treatment areas within lakes can manage invasive plants, and we continue to invest and develop new products for selective plant management. We feel that it is important that the Minnesota DNR understand that these tools exist and are used much more frequently in other states where exotic plants, such as Eurasian watermilfoil, are recognized as a threat to natural resources. Invasive species like Eurasian

watermilfoil can have deleterious effects on natural resources by reducing species richness and diversity, altering water quality, native habitat, and lake ecology; not to mention impede resource utilization. We would also encourage the Minnesota DNR to be more proactive and collaborative in working with companies who understand their products to manage larger-scale treatments.

In summary, we certainly appreciate the help and interaction with people such as you who are “encouraging” the Minnesota DNR to be more proactive in the management of aquatic management to the benefit of the people of Minnesota. Tools are available to meet the desired goals, but there has to be a willingness to both evaluate and then use such tools responsibly on a broader scale to help manage the expansion of nuisance aquatic plant species within Minnesota. Feel free to discuss this situation with me.

Regards,

A handwritten signature in black ink, appearing to read "William H. Culpepper". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

William H. Culpepper
President & CEO
SePRO Corporation