

Katherine Petronis  
Deputy Commissioner  
NYS Department of Environmental Conservation  
Office of Natural Resources  
625 Broadway  
Albany, NY 12233-1010

Dear Deputy Commissioner Petronis,

The New York State Federation of Lake Associations, Inc. is a 501(c)3 not-for-profit organization whose members make up lake associations across the state as well as many individuals and some corporate members. Founded in 1983, our mission is *“to protect the water resources of New York State by assisting local organizations and individuals through public dialogue, information exchange and collaborative efforts.”* Since 1986, we have also partnered with the NYS Department of Environmental Conservation’s to coordinate and manage the Citizens Statewide Lake Assessment Program (CSLAP).

Since the 1980s, lake associations across the state have experienced increasing challenges including deteriorating water quality and aquatic invasive species. Our members have spent many millions of dollars attempting to control unwanted species in an effort to preserve New York’s lakes.

We are writing to you because some lakes in the Adirondack Park are not allowed to use the same tools to manage aquatic invasive plants as other lakes. Specifically, there are contradicting and confusing regulatory hurdles for the use of aquatic herbicides, including the newer generation ProcettaCOR®. It is our understanding, that this is being driven by Adirondack Park Agency/NYS Department of Environmental Conservation “Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC Administered Lands of the Adirondack Park”. We have been in communication with staff members from both APA and DEC who agree that some modifications to this agreement are warranted and that the guidelines should continue to reflect advancing science regarding aquatic plant management and newer generation herbicides.

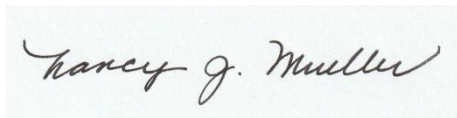
Agency management seems reluctant to change the established policy of not allowing aquatic herbicides on lakes within the Adirondack Park in cases where any part of the lake’s shoreline is owned by the State of NY. However, at least two Adirondack lakes (Minerva Lake and Lake George) have been given permits to use aquatic herbicides, and Lake George has Forest Preserve shoreline, albeit not along the segments proposed for treatment.

While NYSFOLA does not necessarily advocate for “blanket permission” to use aquatic herbicides on all Adirondack Lakes, there are certainly some waterbodies where all other attempts to control invasive plant species have failed, and some of these lakes would be good candidates for herbicide treatments designed to bring plant populations under control. NYSFOLA is in favor of an updated interagency

agreement for lakes within the Adirondack Park. The fragmented regulatory system that has begun to develop, with the permitting for Lake Minerva and Lake George, appears to be unfair to other lake associations. It is also allowing invasive aquatic plants, such as Eurasian water milfoil, to flourish and spread on lakes where responsible herbicide controls may be warranted

On behalf of our Adirondack Park members, we hope that you will work with the Adirondack Park Agency and NYS DEC to address this issue so that the ecological and recreational disruptions caused by aquatic invasive species can be responsibly and reasonably addressed..

Sincerely,

A handwritten signature in cursive script that reads "Nancy J. Mueller". The signature is written in dark ink on a light-colored, slightly textured background.

Nancy Mueller, Executive Director on behalf of  
Tarki Heath, President and the NYSFOLA Board of Directors

Adirondack Park Agency  
Catherine McGlynn, NYS DEC  
Brian Greene, APIPP  
Rolf Tiedemann, Eagle Lake Association  
Daniel Gorke, Paradox Lake Association  
Scott Ireland, Adirondack Lakes Alliance  
Walter Lender, Lake George Association



## Lake George Park Commission

Kenneth Parker  
Chairman

Dave Wick  
Executive Director

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**To: Megan Phillips, Deputy Director for Planning, Adirondack Park Agency**  
**From: Dave Wick, LGPC Executive Director**  
**Date: June 30, 2022**

**Re: Public Comment on Proposed Changes to Inter-Agency Guidelines for Best Mgmt. Practices to Control Invasive Species on DEC Administered Lands of the Adirondack Park**

On behalf of the Lake George Park Commission, I am offering comments of support to the proposed updates to APA's Guidelines for Best Mgmt. Practices to Control Invasive Species on DEC Administered Lands of the Adirondack Park. We understand that sustainable ecosystem management requires solutions that balance unique natural conditions with a site's intended use. The Adirondack Park and Lake George Park are both enjoyed by many thousands of visitors every year, however, ecosystem disturbance and introduction of invasive species an immediate threat to the ecosystem health and local economy. In the face of such intensive use, land stewards require flexibility to manage invasive species in a way that is both timely and effective over the long-term. We believe that APA's updated guidelines provide this needed level of freedom while still offering the State Agency's expert review.

The Lake George Park Commission especially supports opening the use of aquatic herbicides on waters adjacent to New York State owned land. Given our decades-long experience in managing invasive species in Lake George waters, we believe that targeted, next-generation herbicide treatments can be an important tool needed to address the growing invasive species problem in the Parks. Its use should not be automatically restricted, especially when other alternatives have been exhausted or shown to be minimally effective. We believe the Work Plan described by the proposed guidelines allows proper vetting for sites that may warrant chemical management.

Specifically, we feel that allowing the consideration of herbicide for aquatic invasive species management in New York State waters is consistent with existing State goals and policy for the following reasons:

**Herbicide and pesticide application is already occurring for special purposes of safety and health adjacent to or on forest preserves.** The APA General Permit 2011G-2, issued May 13, 2011, allows the New York State Department of Transportation to apply certain herbicides within 100 feet of wetlands around guide rails and signposts within the State highway rights-of-way. The Permit's Findings of the Fact acknowledge spraying herbicide in this context "will not result in undue adverse impacts on Park resources, will not substantially impair the functions served by or the benefits derived from wetlands, and will provide economic and social benefits to the affected municipalities." If such conditions are approvable

for the reduction of vehicular traffic risk, it begs the question to why this management practice could not be applied to manage invasive species in New York State waterways which greatly support local economies.

Additionally, Permits have been issued to at least seventeen towns in the Adirondack Park to apply *Bacillus thuringiensis israelensis* (BTI) to eradicate blackfly larvae from streams. Despite their nuisance, Black flies are native, do not harbor disease, and are a food source for native fish. Therefore, in at least this case, the State has determined that the benefit to public health and safety derived from pesticide treatment outweighs the potential harm to a native species and their ecosystem dependents. Considering that many of today's next-generation aquatic herbicides are selective and targeted to non-native species, a similar benefit could be obtained with little to no adverse consequences.

**Chemical invasive species management meets existing APA goals of removing traces of human activity on State lands.** The Adirondack Park, through Agency regulation and management, has maintained a characteristic of a wild and anthropogenically unaltered forest. One example of this is APA's intention to remove fire towers from certain areas of State lands to eliminate the influence of man and re-establish native ecosystem conditions. Despite their popularity to tourists and hikers, the fire towers are indisputably anthropogenic parts of the landscape. Removal of aquatic invasive species meets this larger Agency goal of removing anthropogenic influences, and in many cases, is the most effective solution. The Agency should be open to authorizing plans for herbicide application when other forms of management are unfeasible or would be inadequate to stop the spread of invasive species and cause subsequent ecological damage.

**The State Land Master Plan requires "rapid response" to "eradicate or control existing or newly identified invasive species populations".** Timely and thorough management of invasive species populations is required for realizing long-term ecological success. If left untreated or if treated inadequately, the invasive population can rebound quickly and colonize new sites. The Agency should consider all management techniques when reviewing plans and select those that provide the best site-specific solution. Targeted aquatic herbicide application will sometimes be the best and only option for an over-run or regularly problematic site. APA's new guidelines allow herbicide as a considered BMP and opens the option of a Rapid Response plan. Together, these will allow invaded sites to be treated quickly and effectively, curtailing any additional spread through the Park.

**Aquatic Herbicide Treatment is Required to Maintain a Robust Local Tourism Economy:** The Adirondack Park is defined by its preservation of State Lands and Waters; people visit from all over the country to experience its natural beauty and recreation activities. Aquatic invasive species are a direct threat to these experiences and the multi-billion-dollar economy they support. Additionally, allowing the aquatic ecosystem to degrade affects not only the resource, but the local communities themselves. The APA should allow communities and land managers to address threats in a way that is consistent with current and evolving BMPs. The new guidelines proposed by the APA enable land managers to support the native ecosystem that is so appreciated by locals and visitors, with appropriate oversight and guidance from the agency.

**Effective Invasive Species Removal is Required to Maintain the Natural Character and Resiliency of the Adirondack and Lake George Parks.** A primary draw of the Adirondacks is its extensive natural resources, with high quality waterbodies and limited human interference in a large percentage of the Park. However, the proliferation of aquatic and terrestrial invasive species is a direct threat to this wilderness and its natural resilience. Land managers will need to be able to address invasive species in a way that is quick and targeted to prevent loss of these services. The new APA guidelines provide this level of flexibility and timely action for proposed plans, and will lead to greater long-term successful management.

In summary, The Lake George Park Commission supports the proposed guidelines as written. We believe they strike an important balance between agency oversight and local management priorities. The process of review for Standard Work and Rapid Response Plans will allow for more flexibility and timely management strategies for the intensively used Park. We applaud the Agency's intention to accept the fully array of approved invasive species management techniques in addressing this tremendous threat to the Adirondack region.

We look forward to our continued partnership with the Adirondack Park Agency. Thank you for the opportunity to comment on these changes; if you have any questions, please do not hesitate to contact me.

\*\*\*\*

July 11, 2022

Ms. Megan Phillips, Deputy Director of Planning  
**Adirondack Park Agency**  
P.O. Box 99 Route 86  
Ray Brook, NY 12977

**RE: Adirondack Park Agency-NYS Department of Environmental Conservation Inter-Agency Guidelines to Control Invasive Species on DEC-Administered Land in the Adirondack Park – Public Comments**

Dear Ms. Phillips:

The Lake George Waterkeeper (“Waterkeeper”) and the Lake George Association (“LGA”) would like to thank the Adirondack Park Agency (“Agency”) and the New York State Department of Environmental Conservation (“Department”) for the opportunity to provide public comment on the proposed “Inter-agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park (“Guidelines”).

Invasive species can have a significant impact on the vital ecological resources of the Park and we applaud the Agency and Department for proposing measures and flexibility to proactively confront this issue. This is a critical issue for the LGA and the Waterkeeper and we have supported partners such as the APIPP and LGPC in early detection and treatment programs, provided training that has improved detection abilities and look forward to further assisting the Agency and Department in this significant challenge.

With regard to these proposed Guidelines, the Waterkeeper and LGA are of the opinion that additional information and detail is required to clarify important aspects of this proposal, especially regarding the ability of the public to comment on proposed “best management practices” which, as designed in this Guideline, and appears to be able to allow either the Department or the Agency to by-pass statutory and regulatory permit and public review processes. Below are our detailed comments on the proposed Guidelines:

1. We are concerned about the proposed Rapid-Response Work Plan and how this may allow the use of management tools that have not been adequately researched and/or may result in more significant ecological and long lasting, if not irreparable harm to treatment areas. These Work Plans must go through the process detailed for the Standard Work Plan including compliance with SEQRA. The application of aquatic herbicides also requires a permit from the Agency and the Department. These permit requirements are statutory and cannot be circumvented through a policy document. This would include but not be limited to aquatic herbicides and insecticides.

2. It is not clear if there will be a 14-day public comment period or, for that matter, any public comment period for a Rapid-Response Work Plan. Under “Procedures for Implementation” (page 9, second paragraph), it states: “The BMPs will be reviewed by the Department and the Agency. BMPs will outline appropriate treatment methods that conform to state laws and the Master Plan. Work plans will be noticed in the Environmental Notice Bulletin (ENB) and will be subject to a 14-day public comment period prior to approval.” Under “Definitions” at page 8, “Rapid Response Work Plan”, that: it states that: “Approved Rapid-Response Work Plans can be implemented immediately upon being noticed in the ENB. (emphasis added). There must be a public comment period prior to implementation and all necessary permits must be obtained before aquatic herbicides are applied pursuant to this policy. We believe that any such action would be illegal and in violation of existing statutory/regulatory public review requirements and criteria.
3. Did the Department and the Agency apply the requirements of SEQRA to this proposed action of adopting and implementing these Guidelines? If not, why not?
4. Under “Introduction” at (page 5), last paragraph, it states: “The procedure for amending the guidelines did not enable staff to react quickly as new species came to the park and new tools and methodologies were developed to address these invasive species.” What “new tools and methodologies” are being referred to since the last amendment to these Guidelines in 2018? How will the public be informed of their existence?
5. Under “Potential Environmental Impacts” page 6, last sentence, it states: “Protection, preservation and restoration of native flora and fauna in the Adirondack Park are outcomes worth reasonable associated risk.” What type of “risks” are you referring to and what are the criteria that you apply in determining if an outcome is “worth reasonable associated risk”? [Our concern here can be highlighted by the event what resulted in spraying of the herbicide Accord, containing glyphosate, along state roads in the Lake George basin by the New York State Department of Transportation under a permit from the Department of Environmental Conservation in June 2021 and resulted in significant impact to native vegetation, including locust trees and ferns, which was referred to as “collateral damage”.]
6. Under “Definitions – Early Detection and Rapid Response” (page 7), what is the definition of “potentially invasive” and what are the criteria applied in determining a “potentially invasive” status?
7. Why are aquatic herbicides now being proposed for the first time as a management tool or an Identified Best Management Practice, especially in a “Guidance” document?

8. Shouldn't the introduction of aquatic herbicides to this Guideline as a Best Management Practice be isolated from this proposal and undergo its own SEQRA evaluation as a new action to this series of Guidelines refinements and identifying and evaluating such things as permit requirements, limitations on use, methodologies, criteria for impact assessment, risks, etc.?
9. Under "Definitions" at page 7: "DEC Administered Lands" – please identify all categories of these non-Forest Preserve lands under the jurisdiction of the Department within the Adirondack Park?
10. Are underwater lands DEC-administered lands?

In closing, the Waterkeeper and LGA feel the preceding points of concern must be clarified prior to any adoption of new Guidelines that may result in a change in policy for managing invasive species on DEC-administered lands within the Adirondack Park. We would more than welcome the opportunity to meet with the Agency and Department to discuss our concerns and seek any implementation of practices that will allow the Agency and Department to address this critical issue while ensuring the ecological protection of the Park through an open review process that squarely applies proper science.

The Lake George Waterkeeper and the Lake George Association look forward to working with the Adirondack Park Agency and the NYS Department of Environmental Conservation to defend the natural resources of Lake George and its watershed. Thank you for your consideration.

Sincerely,



Christopher Navitsky, PE  
Lake George Waterkeeper



Eric Siy, President  
The Lake George Association

cc: Tom Ulasewicz





## Adirondack Park Invasive Plant Program (APIPP)

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(518) 576-2082 . PO Box 65 . Keene Valley, NY . 12943  
[www.adkinvasives.com](http://www.adkinvasives.com)

July 8, 2022

Megan Phillips, Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

Dear Ms. Phillips,

The Adirondack Park Invasive Plant Program (APIPP) appreciates the opportunity to comment on the proposed "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park" (Guidelines). APIPP supports the revisions to the Guidelines, and offers a few suggested modifications to the draft to provide additional clarity about implementation (please see the attached tracked-changes version).

### **Overview**

APIPP has partnered with the New York State (NYS) Adirondack Park Agency (Agency) and NYS Department of Environmental Conservation (NYSDEC) on invasive species issues for more than 20 years. APIPP thanks the Agency and NYSDEC for this partnership and for the work of the agencies' staff to revise the Guidelines to reflect the lessons learned over the last two decades. The two most notable lessons reflected in the updated Guidelines are the need for more nimble best management practices (BMPs) and for a streamlined approach to Work Plans.

### **Best Management Practices**

APIPP supports revisions to the Guidelines to replace the former static approach of pre-approved BMPs, which was not reflective of rapidly-changing science and conditions on the ground, with an adaptive approach of BMPs approved as a part of the Work Plan application process. The former BMPs attempted to anticipate all the species and all the management practices that would be needed across all land types. This approach proved impractical as new species (such as hemlock woolly adelgid) or new treatment options (glyphosate alternatives for knotweed control or chemical treatment for aquatic invasive species) were constantly emerging.

APIPP supports the new approach, which requires that the specific BMPs to be deployed on the ground be detailed in the Work Plan. Requiring case-specific review of the most current BMPs will ensure invasive species treatment on the Forest Preserve reflects the best available science. While it is clear that this is the outcome intended by the Guidelines, APIPP offers some adjustments to the wording of the draft Guidelines to clarify the intent and the process for implementation.

## **Workplans**

When APIPP first started assisting NYSDEC with invasive species management on the Forest Preserve, only a few experimental locations were treated. As experience has proven that management actions are effective (62% of sites treated by APIPP no longer have the target invasive species present and are restoring to natural cover), and as new infestations are found, the number of sites treated each year has grown. Invasive species control work has now become a necessary part of the routine maintenance of the Forest Preserve.

In 2022, APIPP submitted Work Plans to monitor or perform treatment on approximately 40 state land units at more than 200 individual sites. While this may sound like a lot, most sites are less than a tenth of an acre, and the total acreage managed on Forest Preserve is approximately 11 acres. Treating these small sites while they are still manageable prevents invasive species populations from growing out of control.

Under the former Guidelines, each individual state land unit required a detailed Work Plan and multiple maps for each individual site treated. Since the proposed treatment for each site was the same, most of the information was repeated in each Work Plan, resulting in hundreds of pages of redundant text that had to be prepared by APIPP and reviewed by the agencies. In addition, each Work Plan had a different expiration date, which made tracking and renewing the Work Plans challenging.

APIPP fully supports the shift to a Rapid Response Work Plan and a five-year Standard Work Plan for terrestrial or aquatic invasive species. APIPP applauds the revision that allows multiple treatment sites for one or more species to be consolidated into a Standard Work Plan, with case-specific BMPs and GPS coordinates for the sites to be treated. This approach will be far more cost-effective and will allow the agencies' staff to easily overlay the proposed treatment sites with the state's geographic information systems (GIS) maps for easy reference and review. The updated Guidelines also offer clarity about the timing of the Work Plan review and public notice process, which APIPP supports.

## **Conclusion**

APIPP appreciates its two-decade-long partnership with the Agency and NYSDEC in protecting the Forest Preserve from the harmful impacts of invasive species. We also appreciate and support the revisions to the Guidelines that reflect the lessons learned over the last twenty years, allow for the best available science to be used for managing invasive species, provide a streamlined approach to Work Plans, clarify the public input process, and provide the Agency and NYSDEC with the tools needed to protect the Forest Preserve. Thank you for this opportunity to comment.

Sincerely,



Tammara Van Ryn  
APIPP Program Manager

APIPP serves as the Adirondack Partnership for Regional Invasive Species Management (PRISM), one of eight partnerships across New York. APIPP is hosted by The Nature Conservancy and receives financial support from the Environmental Protection Fund administered by NYSDEC.

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**Adirondack Park Invasive Plant Program Comments July 8, 2022**

# **Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park**

Approved DATE

Prepared by:

**NYS Department of Environmental Conservation**  
625 Broadway  
Albany, NY 12233

**Adirondack Park Agency**  
PO Box 99  
Ray Brook, NY 12977

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**Adirondack Park Invasive Plant Program Comments July 8, 2022**

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## INTRODUCTION

The negative impacts of all taxa of invasive species on natural communities are well documented. Colonization and unrestrained growth of invasive species cause the loss of biodiversity, interruption of normal hydrology, suppression of native vegetation, and significant aesthetic, human safety and economic impacts.

These guidelines apply to DEC-administered lands within the Adirondack Park, which are comprised primarily of Forest Preserve lands. The Forest Preserve is protected by Article XIV, Section 1 of the New York State Constitution. This Constitutional provision, which became effective on January 1, 1895 provides in relevant part:

*The lands of the state, now owned or hereafter acquired, constituting the Forest Preserve as now fixed by law, shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private, or shall the timber thereon be sold, removed or destroyed.*

The Department has jurisdiction over the Forest Preserve, and its management of these lands must conform with this Constitutional provision.

Management of the Adirondack Forest Preserve is guided by the Adirondack Park State Land Master Plan (Master Plan), which was initially adopted in 1972 by the Adirondack Park Agency (Agency or APA), with advice from and in consultation with the Department, pursuant to Executive Law §807 (recodified as Executive Law §816). The Master Plan provides the overall general framework for the development and management of State Land in the Adirondack Park. The Master Plan sets forth the following classifications for State Land within the Adirondack Park: Wilderness, Primitive, Canoe, Wild Forest, Intensive Use, Historic, State Administrative, Wild, Scenic and Recreational Rivers, and Travel Corridors, and sets forth guidelines for management and use of each of these major land classifications.

A 2016 update to the Master Plan recognizes invasive species as a documented threat to the ecological integrity of the Forest Preserve. To protect natural resources, minimize economic impact, preserve aesthetic value and promote human safety, the Master Plan provides in relevant part:

*Efforts should be made to restore and protect the native ecological communities through early detection and rapid response efforts to eradicate or control existing or newly identified invasive species populations. Subject to existing policy and guidelines, the Department will use the basic tools needed to preserve, protect and restore the natural native ecosystems of the Forest Preserve.*

Executive Law §816 requires the Department to develop, in consultation with the Agency, individual unit management plans (UMPs) for each unit of land under the Department's jurisdiction which is classified as one of the nine classification categories set forth in the Master Plan. The UMPs must conform to the guidelines and criteria set forth in the Master Plan and apply the Master Plan's general guidelines for particular classifications of state land within the Adirondack Park. References to invasive species will be included in UMPs

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as they are updated or revised.

Executive Law § 816(1) provides in part that “the master plan for management of state lands and the individual management plans shall guide the development and management of state lands in the Adirondack Park.”

Article XIV, Section 1 of the New York State Constitution does not specifically address the issue of invasive species. However, since Article XIV directs that Forest Preserve lands be “forever kept as wild forest lands” and prohibits the removal or destruction of timber, care must be taken to ensure that decisions to eradicate invasive species do not result in a material cutting of Forest Preserve timber or adversely impact the wild forest character of Forest Preserve lands. However, in recognition of the significant threat posed by invasive forest pests, Environmental Conservation Law §9-1303 grants the Department or its duly authorized agent’s authority to control and prevent the spread of forest insects and forest tree diseases including “discretionary authority to poison forest areas in or near sections infested by insect pests or forest tree diseases.”

Surveys of DEC-administered lands document the continued introduction and expansion of invasive species into and throughout the Adirondack Park. Experience has shown that eradication of an invasive species becomes progressively more difficult, more expensive, and less effective the longer the species is allowed to grow and spread without intervention, and therefore it is critical for the Department and Agency to address potentially harmful invasive species occurrences in an expeditious manner.

The goal of these guidelines is to establish a process for reviewing invasive species management on DEC-administered lands. Management for invasive species should-must follow best management practices (BMPs), reviewed ~~annually, or as-needed,~~ by the Department and the Agency as part of the Work Plan process described herein, to ensure such management activities do not alter the “forever wild” character of the Forest Preserve beyond the alteration that may be created by choosing a no action alternative.

These guidelines are intended to harmonize the constitutional “forever wild” provisions with the overriding directive in the Master Plan to manage Forest Preserve lands for their protection and preservation through the application of BMPs and compliance with permitting requirements. BMPs described in ~~work-Work plans-Plans~~ must be pursuant to, and consistent with, relevant provisions of the New York State Constitution, the Environmental Conservation Law, the Executive Law, the State Environmental Quality Review Act (SEQRA), the Master Plan, and all other applicable rules and regulations, policies, and procedures.

These guidelines were first adopted in 2007 and amended four times (2010, 2012, 2015 and 2018). In addition to the changes made to the guidelines with the amendments, each of these editions updated the list of species that could be managed and the BMPs allowed for such management. Over the years the list of both species and tools has grown. The procedure for amending the guidelines did not enable staff to react quickly as new species came to the Park and new tools and methodologies were developed to address these invasive species.

## GOALS AND OBJECTIVES OF THE GUIDELINES

The goals and objectives of this document are to protect and restore native ecological communities on DEC-administered lands in the Adirondack Park and prevent the spread of invasive species off of DEC-administered lands. The guidelines seek to achieve this through early detection and rapid response (EDRR) efforts that address existing or newly identified invasive species infestations, and to manage established invasive species populations which cause, or have the potential to cause, impacts to the ecosystem within which ~~it~~they exists, or elsewhere in the Park.

By following these guidelines, the Department and its agents can manage invasive species infestations, and in some cases, locally eradicate them. Eradication, however, is not always an achievable or realistic goal. For large or well-established populations, containment or suppression may be a more appropriate management goal. Implementation of these guidelines and BMPs will help to ensure that the goals are met and that natural processes continue unabated, economic impacts are minimized or avoided, and human health is protected.

These guidelines were developed to define and streamline the process by which the Department and its authorized agents can efficiently treat invasive species through the implementation of BMPs that conform to the guidelines and criteria set forth in the Master Plan and apply the Master Plan's general guidelines for particular classifications of State Land within the Adirondack Park, as well as by meeting permitting requirements.

## POTENTIAL ENVIRONMENTAL IMPACTS

Invasive species have the potential to cause significant damage to the native ecological communities of the Adirondack Park. The removal of invasive species reduces the potential for destruction and harm to New York's environment, economy, and human health.

Any control action has the potential for environmental impact and the benefit must outweigh the risk of no action. (For example, the use of pesticides may cause mortality to non-target species and cutting trees may have both visual and ecological impacts on the landscape.) Although the BMPs and species-specific control methods seek to mitigate these impacts, the potential for impact must be carefully evaluated through the ~~work-~~Work plan-Plan and permitting process and must outweigh the risks associated no-action alternative.

Protection, preservation, and restoration of native flora and fauna in the Adirondacks are outcomes worth reasonable associated risk.

## DEFINITIONS

**APA/DEC Memorandum of Understanding (MOU):** Memorandum of Understanding between the Adirondack Park Agency and the Department of Environmental Conservation Concerning Implementation of the State Land Master Plan for the Adirondack Park, dated



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March 10, 2010, and any updates or revisions thereto.

**Best Management Practice (BMP):** For the purposes of this document, a practice, or combination of practices, that is determined to be an effective and practicable (including technological, economic, and institutional considerations) means of ~~eradicating, containing, or controlling~~ or reducing an invasive species population and/or reproduction potential to a level compatible with goals while avoiding or minimizing non-target impacts and addressing site restoration goals, while conforming to all applicable state laws and the Adirondack Park State Land Master Plan.

**Commented [TVR1]:** This change is intended to use the same words in the BMP definition that are used in the EDRR definition for consistency.

**DEC- Administered Lands:** Wilderness, Primitive, Canoe, Wild Forest, Intensive Use, Historic, State Administrative, Wild, Scenic and Recreational Rivers, and Travel Corridors under the jurisdiction of the Department within the Adirondack Park, which includes but is not necessarily limited to, the Forest Preserve.

**Early Detection and Rapid Response (EDRR):** ~~A -- a systematic effort to detect and eradicate, contain, or control a potentially invasive non-native species introduced into an ecosystem~~ an invasive species while the infestation of that ecosystem is still localized.

**Commented [TVR2]:** The EDRR definition could be simplified since invasive species is defined right below this definition.

**Invasive Species:** A species that is nonnative to the ecosystem under consideration and whose introduction causes or is likely to cause economic or environmental harm or harm to human health.

**New York iMapInvasives:** An on-line, collaborative GIS-based invasive species database and mapping tool serving as the official state invasive species database used for reporting invasive species, recording treatments and success, and mapping invasive species distributions. New York iMapInvasives is managed by the Invasive Species Database Program at the New York Natural Heritage Program (NYNHP), which is a partnership between SUNY College of Environmental Science and Forestry and the Department.

**Partnership Agreement:** An agreement between the Department and an individual, organized group or municipal entity in the form of either a Volunteer Stewardship Agreement, Temporary Revocable Permit, Adopt-a-Natural Resource Agreement, or contract or sub-contract.

**Work Plan:** A description of the proposed management action. Types of Work Plans include: Standard Work Plan or Rapid Response Work Plan; each are described below.

**Standard Work Plan:** A detailed description of work intended to cover the routine management of one or more invasive species control sites over a period of five years. A Standard Work Plan must include the following:

1. A full Environmental Assessment Form Part 1 that summarizes all sites;
2. the GPS coordinates for all of the sites as well as other locational information for the sites such as DEC Region, State Land Unit, County, and Town;
3. an estimate of the size of the infestations and the year the sites were

- last surveyed;
- 4. target species impacts and concerns;
- 5. a Natural Heritage review for nearby rare, threatened, or endangered species that may be impacted by treatment;
- 6. the timeframe for when the work will be undertaken and treatment priorities;
- 7. proposed BMPs and an assessment of treatment alternatives;
- 8. monitoring provisions and reporting of treatment to iMapInvasives (to occur within one year of treatment); and
- 9. any other information required by Agency or Department permits.

**Rapid-Response Work Plan:** An annual detailed description of work intended to allow for swift action to control a new site (such as a new species, new location, or new management technique, etc.) that is not covered under a previously approved Standard Work Plan. Approval of a Rapid-Response Work Plan will be valid for one year, after which a Standard Work Plan is required. Approved Rapid-Response Work Plans can be implemented immediately upon being noticed in the ENB. A Rapid-Response Work Plan must include the following:

**Commented [TVR3]:** It specifies it is good for one year in sentence two.

- 1. A full Environmental Assessment Form Part 1;
- 2. a brief site description;
- 3. the GPS coordinates for the site as well as other locational information for the site such as DEC Region, State Land Unit, County, Town, and surrounding land uses;
- 4. an estimate of the size of the infestation and the year the site was last surveyed;
- 5. a list of target and non-target species and target species impacts and concerns;
- 6. a Natural Heritage review for nearby rare, threatened, or endangered species that may be impacted by treatment;
- 7. the timeframe for when the work will be undertaken and treatment priorities;
- 8. proposed BMPs, an assessment of treatment alternatives, and history of past treatments on the site (if any);
- 9. monitoring provisions and reporting of treatment of iMapInvasives (to occur within one year of treatment); and
- 10. any other information required by Agency or Department permits.

## DOCUMENTING THE EXTENT OF INVASIVE SPECIES

An inventory of invasive species that are present and a measure of the extent of the invasive species infestation is essential to determining the correct course of action. The Department and authorized agents conduct ongoing routine, systematic surveys to identify and quantify the extent of invasive species on DEC-administered lands in the Adirondack Park. The results of surveys are maintained by DEC and within iMapInvasives, and may be utilized in UMPs. When possible, when UMPs are updated, the best available invasive species distribution information should also be updated.

## PROCEDURES FOR IMPLEMENTATION

Management of invasive species by Department land managers and authorized agents must be in accordance with ~~established Best Management Practices BMPs reviewed by the Department and the Agency as part of an approved Work Plan, and approved by the Director of the Division of Lands and Forests (or designee).~~ Agreements between the DEC and authorized agents through Partnership Agreements and an approved Work Plan are required to conduct invasive species management.

~~The BMPs will be reviewed by the Department and the Agency. The Work Plan must contain BMPs will that~~ outline appropriate treatment methods that conform to state laws and the Master Plan. Work ~~plans Plans~~ will be noticed in the Environmental Notice Bulletin (ENB), ~~and Standard Work Plans and~~ will be subject to a 14-day public comment period prior to approval. Stakeholder groups and other agencies may be consulted in the development or ~~revision-review~~ of BMPs included in Work Plans.

~~New York State DEC~~The Department, in consultation with the APA will determine which species can be managed pursuant to these guidelines through the Work plan Plan approval process. In addition to the species prohibited and regulated under 6 NYCRR 575.3 and 575.4, this guidance ~~will~~ pertains to invasive species ~~that have been deemed to be invasive by DEC identified as invasive in NY by New York iMapInvasives (the official database of invasive species in NY)~~ and for which control or eradication is warranted.

Management practices will be implemented through a Work Plan with corresponding SEQRA compliance and/or complementary permits from the Department and/or Agency, when necessary.

The Department (or its authorized agents) will develop a Standard ~~or~~ Rapid Response Work Plan and submit the Work Plan to the Department (Director of the Division of Lands and Forests or designee) and simultaneously to the Agency (Deputy Director, Planning or designee). Work Plans will demonstrate the select management actions, which may vary depending on BMPs and specific conditions, are the minimum necessary to achieve established objectives. Treatments may vary depending upon a variety of site-specific conditions and land classification.

The Agency will evaluate the Work Plan through the State Land Consultation process to determine if the proposal conforms to the Adirondack Park State Land Master Plan, within 30 calendar days of it being submitted for Standard Work Plans and within 14 calendar days for Rapid-Response Work Plans.

The Director of the Division of Lands and Forests, or a designee, will review ~~the~~ Standard Work Plan requests within 30 calendar days of submission and Rapid-Response Work Plan requests within 14 calendar days to confirm that they fulfill the requirements described in the Definitions section above. Prior to implementation of ~~work-Work Pplans~~ for the treatment of invasive species the activity must be posted in the Environmental Notice Bulletin (ENB). The Director of the Division of Lands and Forests, or a designee, will issue a written approval to commence work once the appropriate ENB posting period in the ENB specified in the Definitions has occurred. To the extent that the terms of this

**Commented [TVR4]:** Per the details outlined in the Work Plan definitions, the public comment period applies only to Standard Work Plans, Rapid-Response Work Plans can proceed immediately since time is of the essence.

**Commented [TVR5]:** Per the Definitions, work can commence upon posting in the ENB for Rapid Response Work Plans.

June 1, 2022 DRAFT

Guidelines and the APA/DEC MOU differ as to timelines, these Guidelines will control.

If the Agency determines during its review of a proposed Work Plan that the proposed management activities may potentially have a material effect on the character or use of the land, water or the desirable vegetation thereon or within, Department and Agency staff will then consult to determine if the activity should be addressed as part of an individual UMP or UMP Amendment. If the Agency determines that a permit under the Freshwater Wetlands Act is required, then it may require a permit application and additional information as needed to review the permit application. If the Department determines that a permit is required under ECL 9-1303, 6 NYCRR Part 608, or any other applicable law or regulation, it may require an application or additional information as needed to review a permit application in addition or independent from this process.

## **EFFECT OF THIS ACTION**

Adoption of the Guidelines and implementation through the UMP, and Standard or Rapid Response Work Plans, and/or permitting gives the Department the tools needed to preserve, protect and restore the ecological integrity of DEC- administered lands within the Adirondack Park.

## **RESPONSIBILITIES**

The responsibility for interpretation and update of these Guidelines and overall management shall reside with the Department and the Agency. The Department and its authorized agents shall be responsible for management of invasive species on DEC- administered lands while the Agency will be responsible for providing review of, and advice on, the consistency of the management activities and proposed actions in UMPs with the Master Plan.



**CHATEAUGAY LAKE FOUNDATION**  
[www.chateaugaylakefoundation.org](http://www.chateaugaylakefoundation.org)

**PO BOX 222**  
**LYON MOUNTAIN NY 12952**

**BOARD OF DIRECTORS**

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July 11, 2022

VIA EMAIL

[SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)

Megan Phillips  
Deputy Director for Planning  
Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 891-4050

Re: Comments on Proposed Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park

Dear Ms. Phillips,

The Chateaugay Lake Foundation has been engaged since 2008 in managing aquatic invasive species that have infested Chateaugay Lake. The primary target of concern is Eurasian Watermilfoil. Curlyleaf Pondweed is also present in limited isolated patches and has been removed as part of our ongoing Eurasian watermilfoil control program wherever it has been found. We have relied primarily on removal by hand-pulling by SCUBA divers but have also used benthic matting and Diver-Assisted Suction Harvesting.

Our control activities have been carried out under a permit from APA (General Permit 2015G-2) and a Volunteer Stewardship Agreement with NYSDEC (18-05-RB-01). Our VSA agreement includes surveying, mapping and hand harvesting of Eurasian watermilfoil and other invasive aquatic plants in DEC-administered underwater lands in Upper Chateaugay Lake. Consequently, we are familiar with the advantages as well as the limitations of managing aquatic invasive species under the current regulatory regime. With this background, we offer the following comments on the proposed inter-agency guidelines.

- 1) We support the streamlined and more flexible framework for regulating invasive species on state-administered lands in the Adirondack Park. The proposed guidelines recognize the evolving nature of the threats posed by invasive species, as well as the ongoing development of new methods of control. The proposed framework will allow for more

responsive and effective management of new threats and newly detected infestations. It will also allow for more timely consideration and development of improved Best Management Practices for established infestations, which are sorely needed.

- 2) Establishing narrow timeframes for review introduces more certainty into the process and should facilitate coordination between the Agency and the Department.
- 3) The proposed guidelines remove the prior prohibition on the use of aquatic herbicides, an essential step forward in expanding the range of options for aquatic invasive plant management. New products are offering new opportunities for more effective and economical control with minimal non-target impacts. By calling for "appropriate treatment methods that conform to state laws and the Master Plan," the guidelines provide the protections of existing law and regulation but allow innovation in how BMPs can be tailored in response to different conditions. We feel this would support the development of appropriate BMPS for the still-new use of aquatic herbicides in the Adirondack Park.

Since Chateaugay Lake includes segments of state-administered lands, the issue of allowing use of aquatic herbicide has major bearing on our management plan and activities. We see many advantages to developing BMTs that would allow us to incorporate the use of aquatic herbicide.

The Chateaugay Lake Foundation endorses the swift adoption of the proposed guidelines, which would expand the range of alternatives for control of aquatic invasive species, promote innovation in BMTs, and establish a clear process for reviewing applications for managing invasive species on DEC-administered lands of the Adirondack Park.

Sincerely,

*Mary McLean Johnson*

President  
Chateaugay Lake Foundation

28 Dreams Way  
Paradox, NY 12858  
June 18, 2022

Megan Phillips  
Deputy Director for Planning  
MYS Adirondack Park

Dear Ms. Phillips:

As a property owner on Paradox Lake for 22 years I support the revisions to inter-agency guidelines for implementing the best management practices to control invasive species on DEC-Administered Lands of the Adirondack Park. It is very important that we have the latest tools to control invasive species.

For years my late husband and I have volunteered as lake stewards and paddled in a canoe to mark with orange bottles where we found milfoil so others could harvest it. Despite all the efforts of so many volunteers we are losing the battle.

I look forward to seeing quick approval of the revisions and thank you for your consideration of same.

Sincerely



Jeanette Barth

TO Whom it may concern;

July 08 2022

I represent a group of landowners in the northern Adirondack region, In Duane New York. The water I am referring to is the Deer River Flow and Horseshoe Pond. This area is just south of Malone New York. The waters of Deer River Flow are owned by New York state. The waters for the Horseshoe pond are owned by private owners. We have Eurasian water milfoil in the waters and we have been in a mode of eradication of the milfoil for about 15 or 20 years. We are part of the New York State CSLAP program. Our assigned Lake number is 170.1. I am the President of the Horseshoe pond Deer River Flow Association. We as a group have been contributing resources and monetary funds to control the milfoil with the residents doing hand harvesting and utilizing diving resources from the Paul Smith college over the years. We have worked hard to control the milfoil on the private land and the land owned by the state of New York. The funding for this as I am sure you know is very expensive and for the group of people we have, we are loosing the fight. Over the last few years we heard about lakes that had a chemical (ProcellaCOR) added to help fight the milfoil. We have been working with the local government and trying to get help with the DEC and APA. The problem we have is the private waters flow into the State owned waters. We would love to be able to work with the state agencies to rid the waters of the milfoil that is choking off the water resource for the public and private use as well as for the good of the natural water foul in the area. We have Loons, Duck, Geese, Blue heron, and other birds. The milfoil is growing so thick a person has a hard time paddling around the waters. We are doing a survey this year at least in the horseshoe pond area to see how bad the milfoil is and get locations so we can help keep people from disturbing the weed bed and spreading the milfoil.

What we need is help with the eradication process of the water. We would like to get an urgent response for the use of ProcellaCOR in the Horseshoe pond with the understanding that we will have to continue to control the growth with hand harvesting, We would also like to know if New York can help with the control of the Deer river Flow Eurasian Watermilfoil so we can have a chance of eradication of the invasive Species from our waters. If we get the approval to apply ProcellaCOR only in the Horseshoe Pond The spread of the invasive species will continue with the spread from the Deer River flow waters and the inlets, so we will have to control it for the rest of the time we live in the area. The longer we wait the more Eurasian Water Milfoil grows, year after year. The waters are used by local population as well as the people that live on the waters.

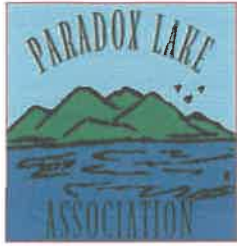
There are several statements and quotes in the draft updated Inter-Agency Guidelines: Best Management Practices to control Invasive Species on DEC Administered Lands of the Adirondack Park that speak to the need for urgent action.

We have been working alone for a lot of years and have fallen behind on the fight to eradicate the milfoil. We are part of the New York State Federation of Lakes association and know there are many people that have been working to fight several invasive species in the waters of New York. We heed help and good planning from the state. We are willing to help but we can not do this alone. Please feel free to contact me any time. I have included my contact information below. If you need any information or anything else please feel free to call or write.

Robert Mayville

President of the Horseshoe Pond Deer River Flow Association,  
Cell # 607 738 3196. Email: Mayvillera@Gmail.com





June 27, 2022

RECEIVED  
ADIRONDACK PARK AGENCY

JUN 29 2022

Megan Phillips  
Deputy Director of Planning  
Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 12977

Re: Inter-Agency Guidelines for Best Management Practices to Control Invasive Species on Department of Environmental Conservation (DEC) Administered Lands in the Adirondack Park.

Dear Megan Phillips,

This letter is to express total **SUPPORT** from the Paradox Lake Association for the revisions to the agreement noted above.

As I have previously communicated when the revisions were being considered, aquatic invasives remain a severe problem in our lake, and we need every option in the future that the new guidelines will provide.

We look forward to seeing quick approval from the APA Board. Thank you for your consideration.

Sincerely,

PARADOX LAKE ASSOCIATION

A handwritten signature in dark ink, reading "Daniel C. Gorke". The signature is fluid and cursive, with the first name "Daniel" being the most prominent.

Daniel C. Gorke  
President

To Whom It May Concern:

In 1939 our family built the first camp on Horseshoe Pond in the Town of Duane, just south of Malone. There have been four generations of Pelkeys who have called this place home. We have been blessed to have had the opportunity to reside in the beautiful surroundings in the Adirondack Park and have enjoyed living a tranquil life on the Pond.



Over the years, however, we have become extremely concerned with the health of our beloved Pond and Deer River Flow which the Pond flows into. There has been a severe infestation of Eurasian Milfoil and our waterways are literally dying. Property owners have invested thousands and thousands of dollars to combat the spread of this invasive species through hand harvesting and mats but to no avail. This has only been a band aid solution to the problem.

ProcellaCOR has been used successfully in other parts of New York State to combat the spread of the milfoil. We are extremely confident that applying ProcellaCOR would be the best option available to ease the spread of the milfoil but it appears that the APA and DEC have been unable to reach a consensus on guidelines for administering this treatment.

We have learned that the APA is proposing changes to general principles that govern the control of invasive species in the Adirondack Park when both the DEC and APA are involved. Our situation in the Pond involves both of the agency and the department since any ProcellaCOR treatment in the Pond for milfoil would result in outflow of some of the chemical into state lands. These state lands include the bottom of Deer River Flow and much of the surrounding lands which are administered by the DEC. With an open comment period regarding these proposed changes, please know we are hopeful that a set of guidelines will be established to provide a framework for work between the APA and DEC.

We urge you to please work towards an agreement that will allow application of the ProcellaCOR in our Pond so this horrible environmental disaster can be halted.

Thank you for your time.

Sincerely,   


Jack and Judy Pelkey  
11617 State Route 30  
Malone, New York 12953  
518-651-6063

RECEIVED  
ADIRONDACK PARK AGENCY

JUL 07 2022

**From:** [Renee Hauserman](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Comment in support of proposed amendment to Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park  
**Date:** Monday, June 27, 2022 12:48:17 PM

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

To the APA,

I am writing to express my support for the proposed amendment to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park."

I am a property owner on Paradox Lake and member of the Paradox Lake Association. My neighbors here, our community, and the PLA have been very involved in efforts over the years to control aquatic invasive on the lake with limited success.

I am concerned about a negative impact on property values from out of control invasives, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable. It's vital that we have all of the latest tools available to continue these efforts and that is what the amendment to the guidelines will now allow.

I am highly supportive of the proposed changes and I look forward to seeing quick approval by the APA board.

Thank you for providing the ability to voice my support.

Sincerely,

Renée Hauserman

**From:** [Miriam Harmatz](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Cc:** [Phillips, Megan \(APA\)](#)  
**Subject:** Comment on Inter-Agency Guidelines for Control of Invasive Species  
**Date:** Sunday, July 10, 2022 3:20:18 PM

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Megan Phillips  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

Submitted via email to [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
Cc: Megan. [Phillips@apa.ny.gov](mailto:Phillips@apa.ny.gov)

RE: Interagency Guidelines for BMPs control of invasive species

July 10, 2022

Dear Ms. Phillips,

As a homeowner and taxpayer on Horseshoe Pond in Duane NY, I am very concerned about the rampant growth of Asian milfoil, not only on the Pond and adjacent waterway, but also throughout the Adirondack Park. As a kayaker, birder, and general naturalist, with professional experience (National Park Service) as an oceanographer/limnologist, I have been witnessing the not so gradual loss of biodiversity in and around Horseshoe Pond led by milfoil.

For years we have been both hand harvesting and matting in efforts to push back the rampant expansion of this invasive. But for the last few years, we have been overwhelmed and are at grave risk of defeat due to milfoil's degrading effects on this precious ecosystem. I fear we are only one of many such ponds and lake systems in the same condition. Unchecked, it is certain that continued overgrowth will result in the degradation of water quality and the disappearance of native species, including our diverse and unique flora, fish, birds and other wildlife. Not only will these processes hurt the economy of the region—home prices, tourist revenue and work opportunities—they will undermine the Adirondack Park's "forever wild" commitment to future generations.

I therefore support and applaud the new draft guidelines, most specifically:

- allowing for DEC or its agents to propose aquatic herbicides as a best management practice (BMP). In our case, please allow by permitting the use of ProcellaCOR, including permission to use even though Horseshoe Pond outflows into DEC administered land.
- enabling flexible and timely response to deal with invasive species of concern. I would like to emphasize a RAPID RESPONSE PLAN. It is becoming clear that opportunity has been missed in the handling of ponds and lakes such as ours, where portions are virtually non-navigable.

The clogging of waterways only promotes overheating and the growth of massive algal blooms that consume oxygen needed for fish and other aquatic life including zooplankton and phytoplankton. In other words, the entire food chain is adversely impacted.

Thank you so much for your proposed changes. PLEASE talk to us; we are willing and eager to help. It is so massively easier, cheaper, more successful, less dramatic, less political and less painful to save an ecosystem than to mitigate once it is lost.

I strongly urge that the Guidelines be adopted as soon as possible.

Respectfully submitted,

Dr. Deborah White  
Dawhite18@aol.com  
3793 Irvington Ave.  
Miami FL 33133 and

29 Tebeau Rd.  
Duane, NY

**From:** [coachbobh@verizon.net](mailto:coachbobh@verizon.net)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Comment on the proposed modification to Inter-Agency Best Management Practices to Control Invasive Species  
**Date:** Monday, June 27, 2022 9:44:10 AM

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To the APA,

I am writing to express my support for the proposed revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a property owner on Paradox Lake, and as the Vice President of the Paradox Lake Association, I have been heavily involved in the efforts that have been undertaken as we attempted to control Eurasian Watermilfoil (EWM) on the lake. We've had a well-coordinated effort with ever increasing contractor harvesting, and a high level of volunteer efforts, but have not been successful in gaining the upper hand on the EWM.

As the lead for our reassessment of our efforts in an effort to see what could be done differently to gain the upper hand, it became clear that the experience in lakes in NY, as well as lakes in other states, was that a hybrid approach of hand harvesting, with target use of herbicides, was often the key to controlling EWM.

Our lake association, as well as me as an individual, are concerned with the potential negative impact on property values from losing control of the EWM population, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable. I'm glad the Inter-Agency Best Management Practices to Control Invasive Species is being modified to allow the consideration of all the tools that may be required to control the EWM in our lake.

I am highly supportive of the proposed changes and I look forward to seeing quick approval by the APA board.

Thank you for your consideration.

Bob Hauserman

**From:** [Nancy and Mark Beddoe](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov); [Phillips, Megan \(APA\)](#)  
**Subject:** Comments on updated Inter-Agency Guidelines: Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park  
**Date:** Tuesday, July 5, 2022 5:06:21 PM  
**Attachments:** [June 2021 informal Horseshoe Pond milfoil survey.pdf](#)  
[August 2021 informal milfoil survey Horseshoe Pond.tiff](#)

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

To Whom It May Concern:

We represent a group of landowners around Horseshoe Pond in the Town of Duane, just south of Malone. We are in urgent need of a protocol concerning the concentration of *ProcellaCOR* allowed to contact state lands in Deer River Flow, into which Horseshoe Pond flows. We have been waiting for a long time for this protocol, while the APA and DEC talk, and talk, and talk concerning a protocol, with no end in sight. Meanwhile the severe infestation of Eurasian Watermilfoil in our pond gets worse year after year.

And yet, there are many statements and quotes in the draft updated Inter-Agency Guidelines: Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park that speak to the need for urgent action:

- [From the Master Plan] Efforts should be made to restore and protect the native ecological communities through early detection and rapid response efforts to eradicate or control existing or newly identified invasive species populations. Subject to existing policy and guidelines, the Department will use the basic tools needed to preserve, protect and restore the natural native ecosystems of the Forest Preserve.
- Experience has shown that eradication of an invasive species becomes progressively more difficult, more expensive, and less effective the longer the species is allowed to grow and spread without intervention [precisely the situation here], and therefore it is critical for the Department and Agency to address potentially harmful invasive species occurrences in an expeditious manner.
- Over the years the list of both species and tools has grown. The procedure for amending the guidelines did not enable staff to react quickly as new species came to the Park and new tools and methodologies were developed to address these invasive species.
- The guidelines seek to achieve this [preventing the spread of invasive species] through early detection and rapid response (EDRR) efforts that address existing or newly identified invasive species infestations, and to manage established invasive species populations which cause, or have the potential to cause, impacts to the ecosystem within which it exists, or elsewhere in the Park.

- These guidelines were developed to define and streamline the process by which the Department and its authorized agents can efficiently treat invasive species...
- The removal of invasive species reduces the potential for destruction and harm to New York's environment, economy, and human health.

It is apparent in the draft updated guidelines that rapid response to invasive species has become very important, but DEC and APA have only been talking, unless the updates usher in faster, more efficient action.

We have been in consultation over the past couple years with APA aquatic invasive species personnel, and they have not disagreed that the application of ProcellaCOR is our only hope with this extensive and fast-growing invasion in a relatively small body of water.

A slide presentation on the draft updated guidelines points out that the draft updated guidelines will:

- allow DEC or its agents to propose aquatic herbicide as a Best Management Practice
- enable flexible and timely response to new species of concern and utilization of the best available science and treatment methodologies

These draft update guidelines are useful to us only if they allow—very, very soon—a permit for us to use ProcellaCOR in our situation that includes a specific outflow into DEC-administered lands. Please see the attached informal survey maps that show a large increase just from June (first map) to August (second map) of last year.

Sincerely,

Mark and Nancy Beddoe  
47 Horseshoe Lane  
PO Box 443  
Malone, NY 12953

518-483-4495



**From:** [Mary Lewis](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Cc:** [Phillips, Megan \(APA\)](#)  
**Subject:** Comments: BMP to Control Invasive Species  
**Date:** Monday, July 11, 2022 7:37:06 AM

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ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Ms Phillips,

We own an antique second home in Duane. It is situated on 58 acres, which includes over 3,000 feet of shoreline, on Horseshoe Pond. We have enjoyed kayaking, fishing and XC skiing (weather permitting!) on the pond for the past 10 years. We feel privileged to be a part of a vibrant community who cares about the ecological health of our Pond.

We write to support the Inter-Agency Guidelines for implementing a BMP to control invasive species on DEC administered lands of the Adirondack Park. The milfoil in Horseshoe Pond has passed the point where management can be achieved through harvesting and matting. Been there, done that. Problem persists. Getting worse. The time for action is now. We need your help.

As the proposed guidelines include meaningful action steps that can save our pond, such as allowing the DEC to propose an aquatic herbicide and submission of a Rapid Response Work Plan, we would urge you to support these guidelines as quickly as possible.

We invite you to be our guest to view our beautiful pond and see for yourself why the Horseshoe Pond community needs action now. Call us at your convenience and we'll meet you there.

Thank you for your consideration!

Best regards,

Mary and Alan Lewis  
914.805.2755

3027 County Route 14  
Duane

3 Hidden Glen  
Highland Mills, NY  
Sent from my iPhone

**From:** [Denise and Tim](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Control Invasive Species  
**Date:** Thursday, June 23, 2022 8:37:46 AM

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**ATTENTION:** This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

TO: Megan Phillips

*I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a property owner/user/visitor of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.*

*I look forward to seeing quick approval by the APA board, and thank you for your consideration.*

*Sincerely,*

*Denise Conway*

**From:** [Nancy Murphy](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Control of Native Species Inter-Agency Guidelines-  
**Date:** Saturday, June 18, 2022 9:10:39 PM

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*I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a property owner/user/visitor of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.*

*I look forward to seeing quick approval by the APA board, and thank you for your consideration.*

*Sincerely, Nancy T. Murphy*

Nancy Murphy  
Sent from my iPhone

**From:** [dmq1656](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** EWM  
**Date:** Thursday, June 16, 2022 9:00:48 PM

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*I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a property owner/user/visitor of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.*

*I look forward to seeing quick approval by the APA board, and thank you for your consideration.*

Sincerely  
Deb Gorke

23 Idlewild Way  
Paradox NY 12858

252 Deerwood Circle #1  
Naples FL 34113

816 820 9858

Sent from my iPhone

**From:** [Kirk Halsted](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Eurasian Milfoil in Paradox Lake  
**Date:** Sunday, July 10, 2022 11:19:21 PM

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*I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a visitor of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.*

*I look forward to seeing quick approval by the APA board, and thank you for your consideration.*

*Sincerely, Kirk Halsted*

Sent from my iPhone

**From:** [martin.myers](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Herbicide use in lakes.  
**Date:** Sunday, July 3, 2022 6:20:39 AM

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I am writing out of concern for the use of herbicides in an attempt to eradicate Eurasian Milfoil from Adirondack lakes. I am a lake front homeowner and concerned the possible toxic cure may be worse than the disease. Why risk it? Although the claim by the manufacturer of these herbicides that these chemicals are safe is supported by the EPA, the truth is the EPA does not independently test the safety of these products instead depending on the manufacturer's own testing. The possibility of bias in this testing should be enough to discourage the use of these chemicals and history has taught us over and over again that formerly safe seeming chemicals proved to be dangerous.

Sent from my iPad

**From:** [Elizabeth Gorke](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park  
**Date:** Thursday, June 23, 2022 7:27:06 AM

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*I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a visitor of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.*

*I look forward to seeing quick approval by the APA board, and thank you for your consideration.*

*Sincerely,*

*Elizabeth Gorke*

**From:** [Guy Fullen](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park  
**Date:** Friday, July 1, 2022 7:48:36 AM

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Ms. Megan Phillips, Deputy Director for Planning, NYS Adirondack Park Agency:

We are writing to express my support for the revisions to Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park. As property owners (24 Whits End Way) of Paradox Lake, we have observed the efforts that have been undertaken for several years to attempt to control aquatic invasive on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. We are concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out-of-control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.

We look forward to seeing quick approval by the APA board, and thank you for your consideration. Thank you for considering our comments on this matter.

Sincerely,

Guy and Teanna Fullen



**From:** [Brian Smith](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Interagency Comments re Invasive Species Control  
**Date:** Tuesday, June 28, 2022 5:53:49 PM

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I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a property owner on lower Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success at stopping the spread from the upper to the lower lake. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide. I fully support the proposed changes.

I look forward to seeing quick approval by the APA board, and thank you for your consideration.

Regards,

Brian Smith  
201 233 2384

Ledge Road, Paradox Lake

**From:** [Linda McClary](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Milfoil Herbicide  
**Date:** Tuesday, July 5, 2022 6:10:17 PM

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I am in support of trying the herbicide discouraging growth of the Eurasian Milfoil for trial purposes in a designated area of Paradox lake in a limited basis. I would support the research/ data collection so that this documentation of these trials would be shared with a larger lake consortium in the Adirondack park.

Linda McClary  
15 Idlewild Way  
Paradox NY

Sent from my iPhone

**From:** [Dee Dee Foran](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Paradox Lake - Invasive Species  
**Date:** Monday, June 27, 2022 11:49:28 AM

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

To: Megan Phillips

I am writing to express my **support** for the revisions to the Inter-Agency Guidelines for Implementing Best Management Practices to control Invasive Species on DEC Administered Lands of the Adirondack Park. As a property owner on Paradox Lake, I have been involved with the efforts that have been in place to control aquatic invasives on the lake. I have also been very involved in FundRaising as well. We simply cannot sustain fundraising to keep this problem under control. We are concerned about property values as well as potential decline in tax revenue that visitors bring to our area if it becomes a less desirable destination due to out of control aquatic invasives.

I am hoping for a quick approval by the APA board and thank you for your consideration.

Sincerely,

Dee Dee Foran  
19 Knox Road  
Schroon Lake, NY 12870



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**From:** [Marie Marhan Dropkin](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Paradox Lake Milfoil Comment  
**Date:** Sunday, July 10, 2022 11:19:19 PM

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*I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a **property owner at 43 Idlewild Way, Paradox, NY 12858** of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.*

***I am in support of selective use of chemical treatments against Milfoil.***

*I look forward to seeing quick approval by the APA board, and thank you for your consideration.*

*Sincerely,* Marie Marhan Dropkin

Sent from my iPhone  
(518) 423-2525 text/mobile

**From:** [Miriam Harmatz](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Cc:** [Phillips, Megan \(APA\)](#)  
**Subject:** Public Comment on Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species  
**Date:** Thursday, July 7, 2022 9:50:09 AM

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Megan Phillips  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

Submitted via email to [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
Cc: Megan. [Phillips@apa.ny.gov](mailto:Phillips@apa.ny.gov)

RE: Interagency Guidelines for BMPs to Control Invasive Species on DEC-Administered Lands of the Adirondack Park

July 7, 2022

Dear Ms. Phillips,

I want to thank you and your colleagues for preparing the updated Inter-Agency Guidelines for Implementing Best Management Practices (BMP) to Control Invasive Species on DEC-Administered Lands of the Adirondack Park (hereafter the "Guidelines") and for the opportunity to submit a public comment on the Guidelines.

I have been fortunate to own a camp on Horseshoe Pond in the town of Duane for over 20 years. The address is 29 Tebeau Rd. I first learned about the Adirondacks through a dear friend, [David Sive](#), one of many environmentalists who worked hard to support the "forever wild" Adirondack Park. As someone who loves the Adirondacks, i am deeply grateful for all of your hard work and efforts on behalf of this unique place we all cherish.

Although my current legal residence is in Florida, where I work full time for a nonprofit, I have gone to our camp every year since 2004. Virtually every day that I've been there, I have kayaked from Horseshoe Pond into Deer River Flow. It is an utterly glorious paddle in every respect—from the scenery to the wildlife.

We have been aware of the problem with invasive milfoil since we bought the camp. We have been supportive of efforts to control the milfoil through matting and harvesting programs as well as the need for application of ProcellaCOR, which has been [reported](#) as the most effective and least toxic chemical treatment for control of milfoil.

I want to note that I agree with all of the comments included in the comment letter

previously submitted by my neighbors on Horseshoe Pond, Mark and Nancy Beddoe. I would also note that the Beddoes, myself and other neighbors have funded an aquatic plant survey of the Pond to be conducted in August 2022 so that we can move forward with a permit for application of ProcellaCOR as soon as possible. As the Beddoes explained, Horseshoe Pond flows into Deer River Flow, which connects to state lands, and we are in consultation with APA aquatic invasive species personnel to assist throughout any applicable permitting process.

**I also need to stress that over just the last year, the growth of the milfoil in Horseshoe Pond has been exponential. The need for the updated Guidelines, a necessary first step in our ability to apply for a chemical treatment, is URGENT. In my opinion, if the recent trend in growth continues for even a brief period of time, Horseshoe Pond is at imminent risk of being forever lost as a navigable body of water, along with forever loss of all of the native aquatic plants and fish that are still surviving.**

In sum, the milfoil in Horseshoe Pond is far beyond management through conventional means including harvesting and matting. Thus, the "*risk of no action*" as referenced in the Guidelines is clear, i.e. the *risk of no action* means the loss of a navigable body of water, native aquatic life and fish. This will also mean a loss of tax funding to support the town of Duane, where homeowners pay taxes and also contribute to the local economy.

Thus, given the urgency of Horseshoe Pond's invasive milfoil situation, we are pleased that the proposed Guidelines includes the following critical steps as compared to the current guidelines:

1.  
Allowing for DEC or its agents to propose aquatic herbicide as a BMP
2.  
Providing for submission of a Rapid-Response Work Plan.

I respectfully urge that the Guidelines be adopted as quickly as possible.

Thank you so much for your consideration of these comments and for all that you do.

Respectfully submitted,

Miriam Harmatz  
[miriamharmatz@gmail.com](mailto:miriamharmatz@gmail.com)  
786-853-9385

3793 Irvington Ave.  
Miami FL 33133 and

29 Tebeau Rd.

**From:** [dougDavis5555@yahoo.com](mailto:dougDavis5555@yahoo.com)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Public Comment on Invasive Species Agreement  
**Date:** Saturday, June 25, 2022 4:29:58 PM

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I am writing to express my support for the revisions for “Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park”. As a Property Owner of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out-of-control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.

I look forward to seeing quick approval by the APA board, and thank you for your consideration.

Sincerely,  
Douglas A Davis  
Paradox Lake Property Owner



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**From:** [John Shirley](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** Support for revisions to guidelines to control invasive species  
**Date:** Monday, July 11, 2022 11:08:31 AM

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I am writing to support the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park."

I am a property owner at Paradox Lake, I have observed and participated in efforts to control aquatic invasives on the lake, but it has had limited success. Members of The Paradox Lake Association have volunteered countless hours to address this along with extensive harvesting by a paid professional contractor. However, we have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out of control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.

I look forward to seeing quick approval by the APA board, and thank you for your consideration.

Sincerely,

John Shirley and Linda McClary  
[John.E.Shirley@gmail.com](mailto:John.E.Shirley@gmail.com)  
203-733-1562  
15 Idlewild Way  
Paradox, NY 12858



**From:** [Dan](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park."  
**Date:** Wednesday, June 22, 2022 8:25:05 PM

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I am writing to express my support for the revisions to "Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park." As a year-round resident of Paradox Lake, I have observed the efforts that have been undertaken for several years to attempt to control aquatic invasives on the lake, with limited success. Countless volunteer hours by members of The Paradox Lake Association along with increased harvesting by a paid professional contractor have not been able to bring our situation under control. I am concerned about property values, as well as a potential decline in tax revenue that vacation visitors bring to our area if our lake becomes less desirable due to out-of-control aquatic invasives. It is critical that we have all of the latest tools available to carry on the fight, and that is what the revisions to the guidelines will provide.

I look forward to seeing quick approval by the APA board and thank you for your consideration.

Dan Gorke  
23 Idlewild Way  
Paradox, NY 12858  
C: 518-703-3574  
[GorkeDan1@aol.com](mailto:GorkeDan1@aol.com)

**From:** [Micah Perks](#)  
**To:** [SLMP\\_UMP\\_Comments@apa.ny.gov](mailto:SLMP_UMP_Comments@apa.ny.gov)  
**Subject:** comments  
**Date:** Sunday, June 26, 2022 10:58:59 PM

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RE: The APA is proposing changes to general principles that govern the control of invasive species in the Adirondacks when both the DEC and APA are involved.

I am a third generation Adirondacker. I live on Horseshoe Pond in Duane, NY. We've communally raised enough money to fight the invasive milfoil that is choking our pond with a ProcellaCOR treatment. This pond will soon become unusable for people and many animals and fish if the APA and DEC refuse to come together to allow us to act.

Please act now to allow us to act.  
Sincerely,  
Micah Perks

--

Professor of Literature  
Director, Creative Writing Program  
(name pronounced Meekah)  
<http://micahperks.com/>  
<http://creativewriting.ucsc.edu/index.html>