

December 11, 2014

Mr. Phil Hulbert, AIS Workgroup Leader  
NYS DEC, Division of Fish, Wildlife & Marine Resources  
625 Broadway  
Albany, NY 12233

Re: DRAFT Aquatic Invasive Species Management Plan

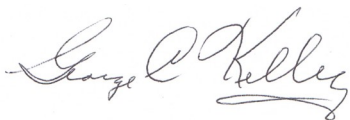
Dear Mr. Hulbert,

Please find, attached, NYSFOLA's comments on the Draft AIS Plan. As you know, the New York State Federation of Lake Associations, Inc. serves as the statewide voice for lake associations and hundreds of individual members dedicated to New York's lakes. We believe that this AIS Management Plan is a good first start towards preventing the spread of Aquatic Invasive Species. However, we are very concerned that lake associations continue to shoulder an ever-increasing burden in this area. Increasingly, lake associations are asked to provide both volunteer and financial resources to address a problem that is often brought to their lakes from visitors.

We believe that the State of NY needs to more fully address the spread of AIS by providing a better regulatory framework and increased staffing and financial resources. Lake associations, particularly the smaller ones, cannot continue to bear the full burden of AIS management.

We thank you for your efforts and hope to continue working with you to prevent the spread of aquatic invasive species in New York's waters.

Sincerely,

A handwritten signature in cursive script that reads "George C. Kelley". The signature is written in dark ink and is positioned above the typed name.

George C. Kelley, President

1. **Executive Summary**—The summary presents a good picture of the history of the problem in New York. The 10 priority actions are laudable, but we have questions regarding the 10 priority items and how they will be accomplished:

**1. Expand the boat launch steward program and ensure consistency of these programs statewide.**

NYSFOLA lake associations are already taking on much of the volunteer and funding burden to expand this program since state funding, when it exists, is not adequate. Will the state adequately fund these programs—or just provide information on how to run a program? Will the expansion occur only at State-owned boat launches? What about the “car top only” launches? There is a need to target canoes, kayaks, and paddleboards in the AIS strategy. What about lakes without public access? Many smaller lake associations do not have the financial or volunteer resources to take on this mission. What about waterbodies with no organized association? Will they be at risk for having little to no prevention strategy?

**2. Develop an AIS response framework to guide decision making when AIS are detected, and communicate the reasoning for the response selected.**

We are presuming that this refers to AIS detection in a high profile location, such as the Cayuga inlet or Erie Canal. That should be stated. What about infestations in small waterways or those without public access? Most “low profile” lakes with AIS have not had a response at all. The lake association, if there is one, is left to deal with the AIS infestation (or not). This priority needs to consider the fact that even small, infested waterbodies can serve as sources of infestation for the larger, higher profile locations. We repeat that the AIS Plan also needs a framework to include waterbodies that do not have an effective local organization, such as a lake association, or where there are multiple organizational stakeholders.

**3. NYSDEC will provide the resources necessary to implement and maintain a viable Management Program.** This is a highly laudable goal, but very vague. Both “resources” and “viable” need to be defined.

**4. Implement an AIS public awareness campaign and evaluate its effectiveness in reaching target audiences.** Who is the target audience? For decades, there has been a great deal of “preaching to the choir.” Tip strips, watch cards, brochures, and webinars tend to be utilized by people who already know about AIS and care. There needs to be much more focus on out-of-state lake users, fishing tournament participants, and others who are not typically reached. DEC (and others) need to reach the people who are NOT already engaged, and that is a huge challenge.

**5. Provide Department leadership for the AIS program to achieve productive and coordinated actions.** Coordinating actions is laudable since there is a lot of “reinventing the wheel” when it comes to AIS outreach.

**6. Identify legal, regulatory and institutional barriers that could impede a rapid response to an AIS introduction.** We fully concur with this priority. In particular, there needs to be a mechanism for rapid review of aquatic pesticide permits in certain instances. However, we would also add “financial” as one of the barriers that prevent a rapid response.

**7. Expand the use of AIS disposal stations at waterway access sites.** The message from most of our lake associations is that disposal stations rapidly fill up with more trash than invasive species, and DEC is not very good at collecting the garbage. This becomes yet another role for lake associations, and it’s not one they particularly enjoy.

**8. Create regional “first responder” AIS teams to incorporate local expertise in planning and implementing appropriate responses to AIS.** Again, our concern here is that this priority is very much slanted towards the larger, high profile locations. There needs to be more consideration with regard to smaller waterbodies.

**9. Continue to coordinate NYS DEC activities within the New York Invasive Species Council.** We concur since many of the activities need to include agencies and partner other than DEC. Continued engagement with other members of the Council is important.

## OBJECTIVES, STRATEGIES AND ACTIONS

NYSFOLA fully supports the research goals stated on pages 17 and 19. We are highly concerned that retirements have devastated the limnology staff within the Division of Water. The hiring of at least one Research Scientist should be a top priority for the Department.

We concur that the regulatory framework to address AIS is “patchy” but support local regulation in the absence of statewide regulation. We disagree that the effectiveness of local laws is reduced simply because regulations are not identical in all locations. We support the actions stated on page 20 but do not want to see State Law that is less stringent than local laws already in place.

We repeat our sentiment that while absolutely laudable, the education and outreach goal needs to be better defined. The target audience needs to be expanded and should include visitors from out of state and all people participating in fishing tournaments, Ironman events, etc. Lake residents should not bear the burden of cleaning up after “guests” using public launch sites.

Boat launch steward programs should, indeed, be expanded, but lake associations cannot be expected to fully bear the burden of monitoring public boat launches. As the State improves access to waterbodies with new boat launches, they should also bear the responsibility of making sure these waterbodies are not infested as a result. This should include all launches, not just those for motorize watercraft.

We also encourage the continued use of iMAP but hope that it can be fully updated to realistically reflect the invasive species that exist in the state’s waterbodies.

The surveillance goals on page 21 rely heavily on volunteers. One mechanism that is not mentioned is the Citizens Statewide Lake Assessment Program. With some additional funding and staff support, this program could provide better training for volunteers to search for/identify aquatic invasive species. Although a limited number of volunteers have conducted surveillance, and as a result, water chestnut was identified in two lakes this year, the program could be expanded if we had better capacity to handle it. We would argue that high participation in local surveillance and monitoring is not currently solely a function of active PRISMs, but includes regions where participation in CSLAP is high.

We support using APIPP as a model, but we caution that volunteers at lake associations are getting “burned out” in many instances. It is also an increasingly older volunteer pool. On page 22 the goal to “Recruit and train volunteers from organizations such as lake associations...” has our support,. However, there needs to be strong support for these volunteers (such as APIPP provides to volunteers in the Adirondack Region.)

Overall, we commend DEC’s efforts to coordinate and implement the AIS Management Plan. We look forward to continued partnership with DEC to protect our waters from Aquatic Invasive Species.

## NYSFOLA - On behalf of our members lake associations:

Anawanda Lake Owners Association	Findley Lake Watershed Foundation	Lake Osiris Association
Arnold Lake Association	Forest Lake Park Club, Inc.	Lake Peekskill Preservation Committee
Augur Lake Property Owners Association	Friends Lake Property Owners Assn..	Lake Pleasant-Sacandaga Committee
Babcock Lake Estates	Friends of Long Lake	Lake Ronkonkoma Foundation
Ballston Lake Improvement Association	Friends of the Long Pond Greenbelt	Lake Salubria Association
Barkley Lake Estates	Fulton Chain of Lakes Association	Lamoka-Waneta Lakes Association
Beaver Dam Lake Prot. & Rehab. District	Galway Lake Campers Association	Laurel Lake Association
Beaver Lake Association	Garnet Lake Civic Association	Lebanon Reservoir Lot Owners Assn.
Bedford Lake Park Association	Geneganslet Lake Association	Lime Lake Cottage Owners Assn.
Berlin Mountains Fish & Game Club	Glass Lake Preservation Corporation	Lincoln Pond Association
Black Lake Association	Glen Lake Protective Association	Little Fresh Pond Association
Blue Heron Lake Landowners Assn.	Goldens Bridge Community Association	Little York Improvement Society
Bowman Lake Association	Grass Lake Association	Long Lake Association
Brant Lake Foundation	Guilford Lake Property Owners Assn.	Long Pond Lake Association
Brantingham Community Association	Hatch-Bradley Brook Lakes Association	Loon Lake Park District Association
Broome County Beaver Lake Association	Hill & Dale Property Owners Inc.	Loon Lake Association
Buckingham Pond Conservancy	Honeoye Valley Association	Lorton Lake Association
Burden Lake Improvement Association	Horseshoe Pond-Deer River Flow Assn	Mariaville Civic Association
Butterfield Lake Cottage Owners Assn.	Hunns Lake Association	Mayfield Lake Association
Camp Gahada Inc. (Jenny Lake)	Hunt Lake Association	Melody Lake Association
Canada Lake Protective Assn.	Indian Lake Association	Millsite Lake Property Owners Assn.
Canadarago Lake Improvement Assn.	Indian River Conservancy Inc.	Mirror Lake Watershed Association
Cape Pond Inc.	Jamesville Reservoir Preservation Assn.	Mohegan Lake Improvement District
Cayuga Lake Watershed Network	Java Lake Colony	Montgomery Lake Association
Cazenovia Lake Association	Kasoag Lake Conservation Association	Mount Arab Preserve Association
Chateaugay Lakes Association	Keuka Lake Association	Mud Lake Association
Chautauqua Lake Association	Kirk Lake Watershed Association	Northwoods Association
Chautauqua Lake Watershed Conservancy	L.A.K.E. Association Ltd. Of Snyder's Lake	Oquaga Lake Improvement Association
Chenango Lake Association	Lake Bonaparte Conservation Club	Orange Lake Civic Association
China-Barrett Homeowners Association	Lake Colby Association	Otisco Lake Preservation Association
Conesus Lake Association	Lake Como Association	Otsego Lake Association
Copake Lake Association	Lake Craine Lot Owners Association	Otter Lake Association
Cossayuna Lake Improvement Association	Lake Demmon Association	Owasco Watershed Lake Association
Crooked Lake Homeowners Association	Lake DeVenoge Property Owners Assn.	Panther Lake Association
Crystal Lake Association	Lake Dutchess Association	Peach Lake Environmental Committee
Cuba Lake District	Lake George Association	Pecks Lake Protective Association
Deer Lake Association	Lake Gerry Association	Petonia Lake Association
Duane Lake Association	Lake Guymard Association	Pleasant Lake Association
Duck Lake Association	Lake Hadlock Association	Plymouth Reservoir Lot Owners
Eagle Lake Property Owners Association	Lake Katonah Club	Protective Assn. of Lake Sunnyside
Eagle Pond Association	Lake Lauderdale Improvement Assn.	Queechy Lake Club
East Caroga Lake Association	Lake Lincolndale Property Owners Assn.	Ragged Lake Association
East Shore Schroon Lake Association	Lake Ludlow Club	Raquette Lake Preservation Foundation
Eatonbrook Lake Association	Lake Luzerne Association	Roaring Brook Lake Property Owners
Echo Lake Association	Lake Missopogue Association	Assn.
Effley Falls Campers Association	Lake Moraine Association	Rondaxe Lake Association
Efner Lake Association	Lake Muskoday Homeowners Assn.	Rushford Lake Land Owners Assn.
Emerald Lake - Hills Pond Association	Lake of the Pines Landowners Assn.	Saratoga Lake Association
Emerson Lake Association	Lake of the Woods Association	Saratoga Lake Protection & Improvement
Fallsburg Fishing & Boating Club	Lake Onderdonk Lake Improvement Assn.	District

Save Hyde Lake Association  
Save Our Sodus  
Save the Pond Owners Assn.  
Schroon Lake Association  
Seneca Lake Pure Waters Association  
Sepasco Lake Preservation Association  
Seven Hills Lake Property Owners Assn.  
Shoreowners Association of Lake Placid  
Sixberry Lake Association  
Skaneateles Lake Association  
Silver Lake Association  
Silver Lake Shoreline Owners Association  
Smith Pond Sportsmen's Club  
Somerset Lake Association  
Song Lake Property Owners Association  
SPLAKE Inc. (Spring Lake)  
St. Regis Property Owners Association  
Stewarts Landing Association  
Stissing Lake Association  
Stratford-Pleasant Lake Club  
Summit Lake Association  
Summit Lake Association for Preservation  
Swartout Lake Association  
Swinging Bridge Property Owners Assn.  
Taconic Lake Association  
Taconic Shores Property Owners Assn.  
Tanglewood Lake Association  
Tawiskarou Lot Owners Association  
Tennanah Lake Taxpayers Association  
Three Lakes Council  
Thunderlake Association  
Timber Lake Estates Property Owners  
Assn.  
Tioughnioga Lake Association  
T. of Patterson, Putnam Lake Park District  
Truesdale Estates Association  
Truesdale Lake Property Owners Assn.  
Tully Lake Property Owners Assn.  
Tunis Lake Property Owners Assn.  
Tuscarora Lake Association  
Twin Lake Improvement Assn.  
Twitchell Lake Fish & Game Assn.  
Ulster Heights Lake Assn.  
Upper Saranac Lake Association  
Village of Tuxedo Park Environmental  
Committee  
Warn Lake Association  
Warners Lake Improvement Association  
Weiden Lake Property Owners Assn.  
West Caroga Lake Association  
White Birch Lake Property Owners Assn.  
Wolf Lake Inc.  
Yankee Lake Preservation Association