

----- Forwarded Message -----

**From:** rolf tiedemann <camptouchstone@yahoo.com>

**To:** Leslie Surprenant <ljsurpre@gw.dec.state.ny.us>

**Cc:** Debra (Ti Town Super) Malaney <debmalaney@nycap.rr.com>; Chris Hyde <cdhyde1@gmail.com>; Bethany (Town Supervisor) Kosmider <[crownpoint@cptelco.net](mailto:crownpoint@cptelco.net)>

**Sent:** Friday, October 28, 2011 1:48 PM

**Subject:** Re: Eagle Lake Renovate - EWM infestation

Leslie

Yes- no application has been submitted, but the reason is that in order to submit one to the APA all questions/ requirements must be addressed, the requirement regarding curtains can not be addressed, based on available information, hence the requested pre-submission meeting held in late Sept. with DEC, with interest of APA to attend. If the question is left blank APA considers the application as incomplete and sends it back, no discussion. I have tried on several occasions to get proof from them and support for their position to require curtains, with specifics that curtains will increase protection to the lake with reasonable financial considerations, but to no avail. Last dialog indicated that they did not know what the "residual of the herbicide was and that they did not have good data on the dispersion of the herbicide"

As to protected plants, yes there are some, but as pointed out in Tim S. letter these will be possibly out competed by milfoil in the "do nothing" approach, or possibly totally killed if curtains are continued to be used as the only large scale resort. The intention is not to treat the entire lake but to do milfoil spot specific treatments, either at one or two locations to start and then expand to treat remaining patches in subsequent years or to do all spots in year one to kill as much milfoil as possible to minimize within lake re-population by plants in areas not treated.

Curtains, if required to complete either treatment plan above, extend in to the thousands of feet, and with EL's clear water quality and resultant milfoil depth of growth to 22+ feet, as mentioned to you in our conversation are beyond reasonable means. APA has suggest that we consider relocating/reconfiguring curtain positions to shallow water to make curtain costs more reasonable for a particular site, but this would only allow treatment of half of the milfoil bed (see letter from APA suggesting this)

<http://eaglelake1.org/archives/communications/2000-2009/2009/2009-5-12%20reply%20letter%20from%20APA%20re%20curtains.pdf>

(a depth transect map detailing their approach and milfoil locations regarding this is located on the [eaglelake1.org](http://eaglelake1.org) website)

In a recent conversation with Ed S. regarding this reconfiguration and the potential for leaving much of the milfoil in the "deep water" outside the curtained segment(s), Ed stated that this milfiol could be addressed by matting and hand harvesting. Cost analysis based on EL experience, as well as other hand harvested and matted lakes compared to Renovate treatment lakes, is on the order of 10 time more expensive to perform non-herbicide treatments and with much less selectivity or long term success.

I, along with the Town Supervisors and the members of the Eagle Lake Property Owners Inc., appreciate that the use of an herbicide has many political and personal interests and opinions. For this reason the ELPOI has hosted and maintained a website [http://eaglelake1.org/html/banner/milfoil\\_project.shtm](http://eaglelake1.org/html/banner/milfoil_project.shtm) that has extensive educational information related to milfoil and its control, has for 20 + years published several newsletters yearly directed to all lake residents alerting them to milfoil (invasives) control/ spread prevention etc..In addition the ELPOI has maintained an open and on going dialog related to this topic with; DEC (your office inclusive), APA, local and state government agencies/officials, surrounding lake associations, local/regional lake management firms and environmental advocacy groups.

In Dec 2005 a "key players" meeting was convened by ELPOI. Representatives of many of the above mentioned

"players" were in attendance. As a result of this meeting, all felt that something had to be done to control milfoil in EL, as well as other lakes in the region. In the interim 6 years since then a "new", more selective, "less baggage" herbicide (Renovate) has been registered. It has been used in several NYS lakes with what DEC calls "meeting the permit" success and has also been used successfully in several VT lakes, all without curtains. Also during this time frame, continued dialog has taken place with many of the key players and most agree that Renovate, used without curtains, would at this time be the most effective and environmentally responsible method for control of EL's milfoil. But the problem of APA's continued insistence on the use curtains, though contrary to the manufacture's recommendation, NYS's registration and product labeling, is blocking consideration for Renovates use in EL.

I, along with the members of the Eagle Lake Milfoil Management Team, stand ready to meet and discuss this issue with those relevant to the permitting process, at any time. This curtain issue has to be resolved "outside of the permitting process" because a permit review and decision will not be given without the provisions being made for/ or submitting to the use of curtains.

As you and I discussed, your and the rest of the DEC staffs support for control of milfiol in EL is very much appreciated.

Rolf

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**From:** Leslie Surprenant <ljsurpre@gw.dec.state.ny.us>  
**To:** rolf tiedemann <camptouchstone@yahoo.com>  
**Cc:** Anthony Lamanno <aclamann@gw.dec.state.ny.us>; Ed Snizek <essnizek@gw.dec.state.ny.us>; John Bennett <jwbennet@gw.dec.state.ny.us>; Scott Kishbaugh <sakishba@gw.dec.state.ny.us>  
**Sent:** Friday, October 28, 2011 11:11 AM  
**Subject:** Re: Eagle Lake Renovate - EWM infestation

Rolf -

Thank you. After I sent that email, I learned that no actual permit application has been filed and there are concerns including the presence of protected plants. As is always the case, there are several entities involved having different interests, roles, and responsibilities.

Regards,

Leslie

>>> rolf tiedemann <[camptouchstone@yahoo.com](mailto:camptouchstone@yahoo.com)> 10/28/2011 11:04 AM >>>

Leslie,

Thanks for the letter, I've shared it with our Town Supervisor, Debra Malaney, as she has been the coordinating force behind recent efforts. We will see if anything new arises from this.

I will keep you posted of further developments.

Rolf Tiedemann  
Eagle Lake Milfoil Project Coordinator  
518-597-3618 lake  
585-647-2514 off season

Just as a support for your position see the following written by DEC specialist Tim

Sinnott[http://eaglelake1.org/archives/communications/2000-2009/2009/2009-7-10%20curtain%20opinion%20letter\\_Sinnott.pdf](http://eaglelake1.org/archives/communications/2000-2009/2009/2009-7-10%20curtain%20opinion%20letter_Sinnott.pdf)

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>From: Leslie Surprenant <[ljsurpre@gw.dec.state.ny.us](mailto:ljsurpre@gw.dec.state.ny.us)>  
>To: Ed Snizek <[essnizek@gw.dec.state.ny.us](mailto:essnizek@gw.dec.state.ny.us)>  
>Cc: John Bennett <[jwbennet@gw.dec.state.ny.us](mailto:jwbennet@gw.dec.state.ny.us)>; Scott Kishbaugh <[sakishba@gw.dec.state.ny.us](mailto:sakishba@gw.dec.state.ny.us)>; Tim Sinnott <[txsinnot@gw.dec.state.ny.us](mailto:txsinnot@gw.dec.state.ny.us)>; [camptouchstone@yahoo.com](mailto:camptouchstone@yahoo.com)  
>Sent: Tuesday, October 25, 2011 10:33 AM  
>Subject: Eagle Lake Renovate - EWM infestation  
>  
>Ed -  
>  
>I received a call from Rolf Tiedeman regarding the herbicide permit conditions to apply Renovate (triclopyr) being requested by APA. Rolf indicates the requirement for herbicide barrier curtains presents a burden both in deployment feasibility and cost. Permits for herbicide applications using Renovate in other waters in the NY have not included this requirement. The mfr label does not indicate the need for barriers - [http://www.sepro.com/documents/Renovate\\_Label.pdf](http://www.sepro.com/documents/Renovate_Label.pdf) My understanding is that Renovate is more selective for EWM than other herbicides.  
>  
>This office supports the efforts to control Eurasian watermilfoil at Eagle Lake. Unfortunately, benthic mats are not selective, resulting in loss of native plants, and I've been advised that hand harvest, a costly approach, has not proven an effective at Eagle Lake. Herbicide may be the only effective and rather selective method left in the quiver; however, if the conditions imposed are not feasible and effectively preclude herbicide use, the likely outcome is simply accepting the presence of invasive EWM ie effectively choosing the "no action" alternative.  
>  
>Please consider recent use of Renovate in other waters in New York to inform APA's permit conditions.  
>  
>Thanks very much.  
>  
>Regards,  
>  
>Leslie  
>  
>Leslie Surprenant  
>Director  
>NYS Dept. of Environmental Conservation  
>Office of Invasive Species Coordination  
>625 Broadway, 5th Floor  
>Albany, NY 12233-4756  
>518-402-8980