

**Subject:** Re: reminder- Dec. 2 deadline for comments to APA for use of Renovate

**From:** Robert Hall (rhall135@yahoo.com)

**To:** camptouchstone@yahoo.com; wmcghie@nycap.rr.com; rcs9234@roadrunner.com; jimhays@ldeo.columbia.edu; eaglake@aol.com; cdhyde1@gmail.com; hsmith@tnc.org; apieper1@nycap.rr.com; mjohnstone@tnc.org; dave@lgpc.state.ny.us; edebolt@lakegeorgeassociation.org; bgladofflife@yahoo.com; wlorang@nycap.rr.com; lreid@thelmreidgroup.com; mikecorey@aol.com; jcargiol@frontiernet.net; hartnm2@gmail.com; rdpaton@aol.com; pveverka@nycap.rr.com; wharbison@comcast.net; Ron.Gill41@yahoo.com; gleninst@yahoo.com; mark.whitney@bollingerwells.com; egriesmer1@gmail.com; jsmith78@nycap.rr.com; krohne@lakegeorgeassociation.org; rcr168@aol.com; vblando@nycap.rr.com; arthavighorst@gmail.com; mawrot@aol.com; dobrien327@nycap.rr.com; Roy.Layton@yahoo.com; gretchen@coachgretchen.com; bjellis@aol.com; jdmulcahy5@verizon.net; awgladcats@msn.com; rbarth9381@verizon.net; bgilles\_rpb@verizon.net; nac4h2o@aol.com; clausula@wildblue.net; wbudmax@verizon.net; adkjohn@yahoo.com;

**Date:** Saturday, November 30, 2013 2:33 PM

Colleagues,

My reading of the proposed guidelines agrees with Rolf's. My letter points out that the guidelines essentially preclude a small, not-wealthy lake like mine (Osgood Pond in Paul Smiths) from applying for a permit to use Renovate. We would first have to spend scarce resources on divers and benthic mats -- requiring a couple of years and all of our money -- to show that they had failed to control the EWM, before we could apply to use Renovate. I asked APA to add a provision for a waiver of the non-herbicide options if it could be shown to APA's satisfaction that -- based on historical results of the other methods and the characteristics of the infestation -- use of the aquatic herbicide was most likely to control the EWM.

Bob Hall  
Osgood Pond

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**Sent:** Saturday, November 30, 2013 1:11 PM

**Subject:** reminder- Dec. 2 deadline for comments to APA for use of Renovate

ALA members,

Just a reminder that the APA is seeking comments on their proposed guidelines for the use of Renovate in Adirondack lakes. The deadline was extended from Nov.7 to Dec. 2.

I believe that it would be in all member lakes' best interest to register comment to these more restrictive proposed guidelines. These proposed guidelines impose burdens and restrictions that go well beyond those required in the rest of NYS's lakes.

The DEC reviews all current permit applications using the guidelines present in the very detailed Supplemental Environmental Impact Statement (SEIS). This document was prepared specifically for everyone's guidance on how Renovate was to be used when it was registered for use in ALL of NYS.

(see [http://eaglelake1.org/environmental\\_issues/control/aquatic/milfoil/herbicide/Renovate/nyseis.pdf](http://eaglelake1.org/environmental_issues/control/aquatic/milfoil/herbicide/Renovate/nyseis.pdf))

The DEC's review of a proposed project does not treat a lake in or out of the Park with any less stringent regard for environmental quality or impact. These SEIS guidelines have guided many successful applications outside the Park. If these numerous applications met their goals without incident, are additional APA guidelines necessary?

If the APA has documented scientific data that shows/proves the need for additional restrictions, then these, too, need to be presented so we can make an informed review.

In speaking to DEC staff and the product manufacture about these proposed guidelines, it was learned that these knowledgeable professionals were not consulted with when these new proposed APA guidelines were developed.

It is my belief that these proposed guidelines should be challenged because, as they are presented, they severely limit those locations in any of our lakes where the herbicide might be successfully used.

Please review the information related to this topic and it's impact on your lake's milfiol management goals/direction and comment accordingly.

Additional information related to the SEIS and pre and post herbicide treated lakes can be found here [http://www.eaglelake1.org/html/environmental\\_issues/control/herbicide.shtml](http://www.eaglelake1.org/html/environmental_issues/control/herbicide.shtml)

Rolf Tiedemann  
Eagle Lake Resident,  
Milfoil Control Team Leader

### **Proposed Guidelines for use of Aquatic Herbicides**

The Agency is proposing Guidelines for use of aquatic herbicides Renovate® and Renovate® OTF to manage Eurasian watermilfoil, an aquatic invasive plant. Public comments concerning this guidance document can be submitted to the Adirondack Park Agency. **All public comments must be received by December 2, 2013.** Please send comments to Leigh Walrath, Adirondack Park Agency, P.O. Box 99, Ray Brook, NY 12977

Read the [Draft Guidance for Public Review and Comment](#) regarding appropriate use of aquatic herbicides.

