EURASIAN MILFOIL

A NUISANCE AQUATIC WEED THAT IS A SERIOUS ECONOMIC AND ENVIRONMENTAL THREAT TO NEW YORK LAKES



FEBRUARY, 1992

Coalition of Lakes Against Milfoil
PO Box 70, Lake George NY 12845 518-668-3558

COALITION OF LAKES AGAINST MILFOIL

PO BOX 70 LAKE GEORGE NY 12845 518-668-3558

BRANT LAKE

James Himoff John Raymond Wright Scidmore

BURDEN LAKE

Otto Bergmann

EAGLE LAKE

Bill Allen Wendy Davis Clarence Watters

GLASS LAKE

George B. Leckonby

KINDERHOOK LAKE

F. Ray Meyer

LAKE GEORGE

Mary-Arthur Beebe Alexander Gabriels

LAKE LUZERNE

Ralph Soda Richard Burns

SCHROON LAKE

Melanie Crear Al Jacob Lester Speiser

WHAT IS THE COALITION?

The Coalition of Lakes Against Milfoil, a group of New York State residents, property owners and lake association members, is concerned with the spreading despoilment of our lakes and waterways by Eurasian Watermilfoil.

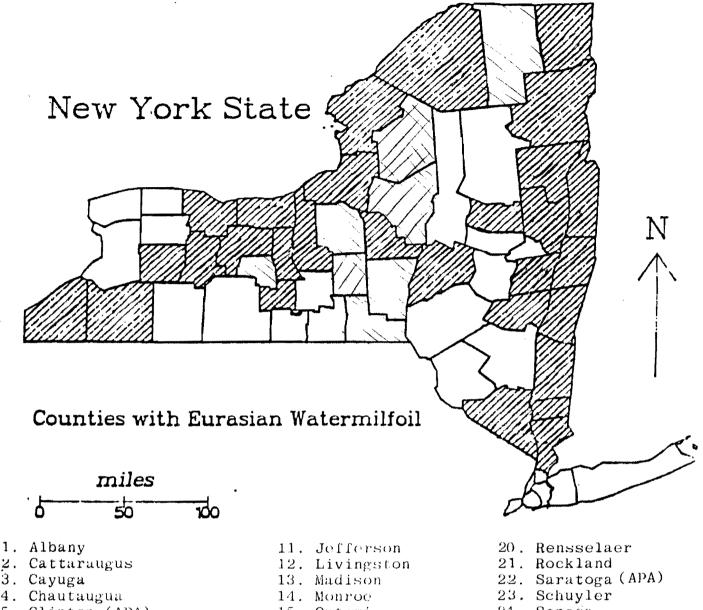
This aquatic weed is alien to the North American continent and curtails the recreational and scenic enjoyment of the lakes and rivers in which it has taken root. It displaces wildlife, erodes property values and eventually destroys the natural ecosystems it invades.

Eurasian Watermilfoil has already cost millions of dollars in lost tourism revenues to state, local and regional economies and has the potential of costing millions more. Many States have adopted strategies to deal with this environmental problem. However, New York has not yet developed a state-wide approach.

Members of the Coalition appreciate the need for a coordinated plan to deal with this problem. Specifically, we are recommending the adoption of a state-wide aquatic weed management program which includes:

- State funding for locally or regionally managed weed control projects.
- *A simplified permit application process for the initiation of weed control projects.
- A determination of the registration of the herbicide fluridone (SONAR) for use in New York State.

If you would like to become involved in or support the work of the Coalition, please contact Wendy L. Davis, Chairwoman at PO Box 70, Lake George NY 12845, 518-668-3558.



2. Cattaraugus 3. Cayuga 4. Chautaugua 5. Clinton (APA) 6. Columbia 7. Dutchess 8. Essex (APA) 9. Fulton (APA) 10. Greene

15. Ontario 16. Orange 17. Oswego 18. Otsego 19. Putnam

24. Seneca 25. St Law 25. St Lawrence (APA) 26. Warren (APA)

27. Washington (APA) 28. Wayne

29. Westchester 30. Wyoming

First found in NYS-1977, by 1980- found in 10 counties, by year-end 1989 stated in FWI Report 2/90 30 counties with milfoil problems. FWI now working on update, due in Feb. 1992.

Browne Chenango
Chenango
Chenango
Franklin APH
Report
Contland
Lewiss AIA
Survey
Controlaga
90
Cineida APA
Survey

TABLE OF CONTENTS

- MAP OF COUNTIES WITH LAKES AFFECTED BY MILFOIL
- COLAM'S REPORT ON EURASIAN MILFOIL
- LETTERS TO GOVERNOR CUOMO:
 DECEMBER, 1991
 AUGUST, 1991
- * EXTRACT FROM EPA'S LETTER ON SAFETY OF SONAR
- LETTER TO W. COLE, FEBRUARY, 1992
- LETTER FROM MAYOR ROBERT BLAIS, TO A. GABRIELS, JANUARY
 28, 1987.
- NEWSCLIPPING SWIMMERS

EURASIAN MILFOIL A REPORT PREPARED BY THE COALITION OF LAKES AGAINST MILFOIL (COLAM)

INTRODUCTION

Our lakes are being systematically destroyed by an aquatic weed named Eurasian Milfoil, which is alien to the North American habitat. Thirty-three of the 50 states in the United States, as well as the Province of British Columbia in Canada, have reported Eurasian milfoil contamination of their once pristine waterways. Where it has been allowed to flourish uncontrolled, this exotic predator destroys wildlife, erodes property values and poisons the natural ecosystems it invades. It has already cost tens of millions of dollars in lost tourism revenues and has the potential of costing millions more. In New York, the Eurasian milfoil crisis is reaching near epidemic proportions. Lakes in 30 of the state's 62 counties - including seven in the once unsullied Adirondack wilderness preserve - are infected by the weed. They are dying, and the state is doing little to save them. The Coalition of Lakes Against Milfoil (COLAM) wants to reverse this trend. We must act now. These are the facts.

EURASIAN MILFOIL WHAT IS IT?

Eurasian water milfoil (scientific name: MYRIOPHYLLUM SPICATUM) is an aquatic weed of European and Asian origin that, according to a study by Oral Roberts University, began to show up in North American waters in the mid 1940's. It was first identified as having rooted in the United States in the Chesapeake Bay. Because it is an alien species, it has few natural enemies or competitors and is capable of flourishing rapidly and eventually crowding out the vegetation native to the aquatic habitat it invades. Once that happens the natural ecosystem is severely impaired; the lake eventually dies.

Eurasian milfoil reproduces by fragmentation, which occurs naturally when the weed flowers at the end of its annual growing season. Agitation by motorboats, cutting, and other mechanical disturbances can also lead to fragmentation. Once fragmented, the pieces are dispersed by wind and water currents, eventually sinking to the bottom and taking root. According to recent Minnesota studies, the weed is spread from one body of water to another, primarily by boats to which some of the fragments adhere; by connecting waterways, and by birds.

WHAT MAKES IT SUCH A THREAT?

Its invasive nature and tendency to profuse and rapid growth is what makes Eurasian milfoil the special menace it is. According to Jon Drossos of the Cayuga County Soil and Water Conservation District:

milfoil control. But this authorization does not extend to those lakes and waterways - such as Lake George - that are within the Adirondack Park, and where, ironically, some of the most devastating, environmental damage from Eurasian milfoil is currently taking place.

THE COST OF EURASIAN MILFOIL

Despite the lack of a coordinated program, New York has spent millions of dollars in the last half decade in a seemingly haphazard and losing effort to arrest the spread of Eurasian milfoil in its lakes and waterways. Most of these programs were the result of local pressures. In the Adirondack lake region of Warren County, almost \$1 million has been spent on Lake George alone, one of the premier tourist attractions of the nation. These funds originate from a variety of government sources and private citizens. Federal and state expenditures are estimated to be \$340,000. Local assistance and county programs are estimated at \$125,000. The private sector has financed about \$215,000. Another \$116,000 has been spent on impact studies and hearings for state permits. And the state and federal government have targeted about \$160,000 to reduce nutrient loading that creates a healthy habitat for milfoil. An additional \$40,000 in county funds was budgeted for studies and the start of control efforts in a few smaller, neighboring lakes, and officials are weighing budget requests for an estimated \$300,000 in funding for 1992.

Almost quadruple that amount was spent during the same period to finance an ambitious, on-going weed control program in the 18-county Finger Lakes region. The state bore most of the costs in grants that fluctuated from \$800,000 in the 1984-85 fiscal year; \$1.1 million in 1987; to a high of \$3 million in 1988-89, and about \$90,000 a year in 1990-91. This was supplemented in varying degrees by funding from the involved counties, the largest being Cayuga County's contribution, which, since the program began in 1984, amounted to approximately \$75,000 a year. And these are just two of a variety of similar projects underway in New York.

The sad truth is: one can only guess at what actually is, or is not, being done on the state level in the way of aquatic vegetation control; or what is, or is not, being funded. For - contrary to the situation in other states that have coordinated programs in place - there is in New York no readily available record, detailing the amount of state, federal or local monies spent on aquatic weed control, and no central clearing house charged with the compilation and public dessimation of such data. Nor is there any way of measuring the cost effectiveness of the money being spent on weed control programs to protect our lakes and waterways, against the economic catastrophe likely to result if such programs continue underfunded.

The threat is real. The Okangan Lake region of British Columbia, Canada, is a grim example. Provincial administrators and scholars there, have officially branded the Eurasian milfoil infestation in Okangan Lake region an economic and environmental "hazard," which is annually costing the province's \$200 million-a-year tourism industry a staggering \$85 million in lost revenues. The finding is contained in a seven-month-long economic impact study recently completed by the province and scheduled to be released to the public later this year.

Dr. Peter Newroth, who heads up the provincial aquatic weed control program, understandably views the damage estimate as "alarming," but takes comfort in the fact that the economic impact study convincingly justifies the government's multi-million dollar, seven-year effort to control the spread of Eurasian milfoil to other Canadian resort areas. The results are even more alarming when one considers the fact that the \$85 million damage estimate represents only losses in tourism revenues to the province. "It does not include the loss in depreciated property values which amount to many millions of dollars more," Newroth said.

New York would do well to heed the Canadian experience. Tourism is its second largest industry. Its scenic, river vistas and wilderness, mountain lakes are - along with the recreational activities they afford - among the most frequented tourist attractions in the state. To allow their defilement by Eurasian milfoil would be calamitous - not only to the resident and visiting population, whose lifestyles they enhance - but to the state, regional, and local governments, whose economies they enrich.

Warren County is a case in point. Anchoring the southernmost threshold of the 29-county, six-million-acre Adirondack Park wilderness refuge, Warren County is the home of Lake George which generates a regional tourism industry almost twice that of Canada's Lake Okangan region. According to a 1991 report of the Adirondack Regional Chamber of Commerce, sales tax revenues account for approximately 50 percent of all county revenues. Tourism accounts for 34.7 percent of that total and seasonal residences, approximately 2.8 percent. Of the \$24 million in sales tax revenues received by Warren County in 1991, approximately \$8.1 million was from tourism and \$480,000 from seasonal residences.

But sales tax revenues are only part of the picture. In a January 18, 1987 letter to Alexander Gabriels, one of the authors of the ENVIRONMENTAL IMPACT STATEMENT FOR THE TREATMENT OF EURASIAN MILFOIL IN LAKE GEORGE, Lake George Mayor Robert M. Blais estimated that if allowed to grow uncontrolled Eurasian Milfoil would in two to three years result in lost revenues of \$968,000 in just boating activities alone. "This loss of revenues is both to public and private owners, and if one realizes the visual impact of the buoys, the warning signs, the weed itself, on the visiting tourists, the ramification are endless," Blais wrote.

These "ramifications" perceived by Blais embrace all aspects of the tourism business - from support industries to direct suppliers - and impacts the entire Warren County regional economy. In January 1992, a group of leading persons in the Lake George area tourism business put this into telling perspective. In a report entitled, STRATEGIC PLAN FOR LAKE GEORGE REGIONAL TOURISM, they wrote: "In 1989 tourism in Warren County generated \$61.3 million in annual payrolls, or 21 percent of the total annual payroll in Warren County." They further quote the New York State Department of Economic Development, Bureau of Research, as estimating that ... "travel and tourism directly generated over one-half billion dollars annually to the economy of Warren County."

Doris Herwig, director of the Warren County Department of Tourism, underscores this dependency of the regional economy on tourism.

"Numerous retail businesses, manufacturing operations and service employes depend on the regional tourism trade," says Herwig. "A decline in tourist interest in the area, for whatever reason, has a corresponding negative impact on the overall Warren County economy."

Not the least of such related losses that can be attributed to uncontrolled Eurasian Milfoil infestation, is the depreciation of waterfront property values cited in the Canadian experience. Philip Dearden of the Department of Geography, University of Victoria, British Columbia, Canada, has reported on this phenomenon. Writing in the JOURNAL OF ENVIRONMENTAL MANAGEMENT (1983), Dearden reported that 43 percent of lakeshore property owners in the Lake Okangan region experienced declining property values, because of reduced recreational lake activity, rotting vegetation and weed-choked, foul smelling waters, which resulted from the milfoil infestation. "The impact is further emphasized by a glance at local real estate listings, which now list 'no weeds' alongside dream kitchen and patio," Dearden wrote.

The experience has been repeated wherever Eurasian milfoil has grown out of control. Lynn Wilbur, president of the Cossayuna Lake Association, reports that Eurasian Milfoil became such a problem in Lake Cossayuna that a canoe had difficulty navigating through the dense beds and property values plummeted disastrously. After several years of treatment by mechanical harvesting and chemical treatment, however, the lake has returned to near normal conditions and property values have tripled.

Owners of waterfront property in Lake Luzerne, N.Y. suspect the growing weed problem on the lake is responsible for a recent lag in sales. "Three years ago, you couldn't find, beg, borrow or steal a waterfront property to offer for sale on Lake Luzerne. The buyer demand was overwhelming," Lake Luzerne realtor Richard Sehlmeyer, chairman of the assessment committee of the Warren County Board of Realtors, told COLAM. "But for the past year and a half we've had four properties for sale on the lake and so-far no takers." He said he did not know how much - if any - of this buyer disinterest was due to the lake's milfoil problem. "But I can tell you this," he said, "whenever an element is introduced that is perceived as adversely affecting either the aesthetics, use, enjoyment or income of a property, that property decreases in value."

That is precisely what some shorefront property owners are experiencing. In Vermont, two owners of shorefront property in Lake Catherine were granted reduced property assessments because of the dense weed beds adjacent to their lands. Again, in Lake Luzerne, NY, a property owner reported to the local lake association last year that a long-time, seasonal renter of his shoreline cabin will not return with his family next year, because of reduced recreational use of the lake caused by the encroaching Eurasian milfoil growth on the cabin's beachfront. The property owner said he will seek a reduction in property assessments this year, as a result of the lost income. Other residents on the lake are contemplating similar action.

As the Eurasian milfoil epidemic worsens, an increasing number of New York lakefront property owners - most of them seasonal residents in small town, rural resort areas - are feeling the pinch. Forced to pay premium waterfront taxes, in the face of declining property values, they

are being pressured to seek more equitable tax assessments. If they succeed - and precedents have been set - the shock to the local tax base of the municipalities involved would be seriously disruptive. Coupled with the attendant losses in tourism revenues, which is documented in the Canadian study, the overall impact of Eurasian milfoil on the area economies may well be disastrous.

WHO PAYS THE BILL

There are in New York a variety of aquatic weed control programs, the funding of which apparently depends more on the political muscle and legislative acumen of the elected officials of the regions involved, than on state concern for the severity of the environmental problems they seek to address. For example, in Saratoga County a special tax district was created by the state legislature for a weed control program on Saratoga Lake. It encompasses the three townships and the City of Saratoga, which border on the lake, and which annually contribute to the costs of a weed control program. The enabling legislation also granted the district governors the authority to levy an advalorem tax to make up the difference between the municipal contributions to the control program and the actual costs of the program. Elsewhere, most of the control programs are run on a local, or regional basis and are supported in varying degrees by state, county, municipal and private funding.

In those states that do have coordinated, state run programs, the state bears the burden of the funding costs for control projects, with the counties and municipalities of the region involved contributing the rest. In British Columbia, the provincial government pays 80 percent of the cost of its ambitious weed control program, and the local municipalities 20 percent.

There is some legal rationale for holding the state responsible for paying most of the costs of such projects. It is called THE PUBLIC TRUST DOCTRINE. It originates in English common law in which the King held title to the sea and the sea bed. The King's title, however, was subject to the overriding right of the public to use the sea and sea bed for commerce, navigation and fishery. Parliament had the responsibility of protecting the public's right. After the American Revolution, the rights of the King and the obligations of Parliament were inherited by the individual states. And these rights were extended beyond salt water to include all navigable waters within the state. There is a question, therefore, whether states who fail to take action to protect and preserve the waterways may be in violation of the public trust.

RECOMMENDATIONS

Having considered the facts, the Coalition of Lakes Against Milfoil concludes that New York's lakes and lake-based economies are being systematically destroyed by Eurasian watermilfoil and that immediate action by the state legislature is required to initiate progressive solutions. Specifically COLAM recommends:

That the New York legislature adopt a progressive, statewide, aquatic weed management program that includes those lakes and waterways within the Adirondack Park.

- That such a program provide state funding for the establishment and operation of local and regional control programs.
- That the application process for the authorization of local and regional aquatic weed management strategies - including the use of herbicides where warranted - be simplified and standardized statewide to permit its preparation at reasonable cost and to insure a reasonably prompt response from the authorizing agency.
- Implementation of a continuing program to monitor the spread of Eurasian Milfoil in New York State waters and to assess the potential damage to state, local, and regional tourism economies posed by the uncontrolled growth of Eurasian milfoil and other problem aquatic weeds.
- The herbicide fluridone (SONAR) be registered for use for aquatic weed control in New York State.

SOURCES

- DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR TREATMENT OF EURASIAN WATERMILFOIL IN LAKE GEORGE, Warren and Washington Counties, N.Y., February 1987
- FINAL REPORT ON SUPVEY OF EURASIAN MILFOIL IN LAKE GEORGE BY RENSSELAER FRESH WATER INSTITUTE, Charles Boylen, director, RPI, Troy, N.Y. Aug. 11, 1986
- EURASIAN MILFOIL SURVEY OF LAKE LUZERNE BY L.W. Eichler, RPI Fresh Water Institute, for Warren County Board of Supervisors, 1991.
- P.R.NEWROTH, Dir., Aquatic weed management program, British Columbia, Canada. (Economic impact study of the cost of Eurasian Milfoil to provincial and regional tourism economies, 1991. A review of Eurasian Watermilfoil impacts and management in British Columbia, First International Symposium on Watermilfoil and Related Haloragaceae Species, July 23 and 24, 1985)
- IMPACT EVALUATION OF THE EURASIAN MILFOIL INFESTATION ON LAKE BOMOSEEN, CASTLETON/HUBBARDTON, VERMONT, Department of Conservation, Sept. 30, 1987.
- Phillip Dearden, Dept. of Geography, University of Victoria, British Columbia, Canada: ANATOMY OF A BIOLOGICAL HAZARD: MYRIOPHYLLUM SPICATUM L. IN THE OKANAGAN BASIN, BRITISH COLUMBIA, Journal of Environmental Management, 1983.
- Holly Crosson, Biologist, Vermont Dept. of Environmental Conservation, VERMONT EURASIAN MILFOIL PROGRAM 1990-91.
- Jon Drossos, Cayuga County Soil and Water Conservation District, 1990 annual report.
- Charles Lee, Senior Environmental *nalyst for Water Resources, Connecticut Dept. of Environmental Protection.
- Nina Caraco, Institute of Ecosystem Studies, Millbrook, N.Y.
- Stephen C. Heller, moorage and docks committee, Seattle Yacht Club, Seattle, Wash.
- Robert M. Blais, Mayor, Lake George, letter to Alexander Gabriels, re: Milfoil impact, Jan. 18, 1987.
- Adirondack Regional Chamber of Commerce.
- STRATEGIC PLAN FOR LAKE GEORGE REGIONAL TOURISM, 1991 study by coalition of tearism business leaders in the Lake George region.
- · Doris Herwig, Director of Tourism for Warren County, N.Y.
- Richard Sehlmeyer, Chrm. of Appraisals, Warren Cty. Bd of Supervisors.
- · Dan Olsen, Water Resources, Warren County Board of Supervisors.
- · David Wallingford, Saratoga Lake District, Saratoga County, N.Y,
- Lynn Wilbur, Pres., Cossayuna Lake Assn, Washington County, N.Y.
- · Charles Boylen, Phd., RPI Fresh Water Institute.
- · James Sutherland, Phd., NYS Dept. of Environmental Conservation.
- · Mary-Arthur Beebe, Executive Director, Lake George Association, Inc.
- · G. Douglas Pullman, Aquest Corp. Flint, Mich.
- James Himoff, president, Brant Lake Association, Warren County, N.Y.
- Karen Brown, Senior Information Specialist, Center for Aquatic Plants, Institute of Food and Agricultural Sciences, University of Florida.

THE LAKE GEORGE ASSOCIATION

August 23, 1991

Honorable Mario M. Cuomo Executive Chamber The Capitol Albany, New York 12224

Dear Governor:

I would like to call your attention, once again, to a grave threat to the health of New York's lakes - the rapidly growing problem of infestation by Eurasian water milfoil.

As you know, this noxious weed rapidly destroys lake environments and the surrounding local economies, many of which are entirely based on the health of our lakes.

Representatives of nine of New York's eastern lakes, including some in the Adirondack Park, met recently to discuss New York's lack of effective action on milfoil control and eradication, and to discuss what might be done. All the representatives believe that their lakes are directly threatened by milfoil which has been spreading rapidly from lake to lake throughout this area in the last five years.

As a result, the group unanimously passed the attached resolution which I believe is self-explanatory, and asked me to direct it to your attention on their behalf.

The group is confident that you share our concern about protecting the precious lakes of our state and seeks your personal attention to our concerns.

Sincerely,

0

Mary-Arthur Beebe

LGA Executive Director

Schroon Lake: E.Melanie Crear Lester Speiser Alvin Jacob

East Shore: Dorothy Daniels

Eagle Lake: Dianne E. Tiedemann Clarence Watters

William R. Allen
Glass Lake: George Leckonby

lithur Bubi

Kinderhook Lake: F. Ray Meyer
Lake Luzerne: Dorothy Greer

Lake Luzerne: Dorothy Greer
Paradox Lake: Whitman Daniels

Brant Lake: Jim Himoff Wright H. Scidmore Otsego Lake: Joe Homburger Gary Baldinger

Lake George: Mary-Arthur Beebe John T. Brothers Zandy Gabriels

Richard Burns

P.O. BOX 408 LAKE GEORGE, NY 12845

(518) 792-6112

PROTECTING THE LAKE SINCE 1885

Ralph Soda

COALITION OF LAKES AGAINST MILFOIL

PO BOX 70 LAKE GEORGE NY 12845 518-668-3558

December 13, 1991

BRANT LAKE

James Himoff John Raymond Wright Scidmore

BURDEN LAKE

Otto Bergmann

EAGLE LAKE

Bill Allen Wendy Davis Clarence Watters

GLASS LAKE

George B. Leckonby

KINDERHOOK LAKE

F. Ray Meyer

LAKE GEORGE

Mary-Arthur Beebe Alexander Gabriels

LAKE LUZERNE

Raiph Soda Richard Burns

SCHROON LAKE

Metanie Crear Al Jacob Lester Speiser Honorable Mario Cuomo Executive Chamber The Capitol Albany, New York 12224

Dear Governor Cuomo:

We write as members of the recently formed "Coalition of Lakes Against Milfoil", to ask your help in correcting what we perceive to be a conscious stratagem on the part of some state agency officials to misrepresent existing laws for their own special interest concerns.

Specifically, we believe the Department of Environmental Conservation, Department of Health, and the Adirondack Park Agency are arbitrarily pursuing a policy calculated to prevent the use of pesticides in New York State, as a means of controlling the deadly Eurasian Milfoil and similar exotic predator weeds that are threatening our lakes with destruction.

This is a clear violation of the legislative intent as expressed in Environmental Conservation Law, Article 33, Section 0301 which under certain conditions permits, the controlled use of pesticides in aquatic weed management. Such a cavalier disregard of the law by those charged with administering it, however well intentioned these officials may be, constitutes in our opinion, an unconscionable breach of the public trust. At the same time, it gravely undermines efforts to protect and preserve the environmental integrity of New York State's lakes, rivers and ecosystems.

As you are doubtless aware, the scourge of Eurasian Milfoil is approaching near epidemic proportions in New York State. It is inexorably spreading throughout our fresh water chain. The danger is real. This invasive weed has the potential of severely curtailing the recreational use of the lakes, rivers, reservoirs and ponds it contaminates, of eroding

adjacent property values, of adversely disrupting the natural ecosystem, and of bankrupting the profitable tourism economy that once flourished as a result of the recreational and scenic attractions of New York's formerly pristine lakes and waterways. Pesticides are one way of fighting this menace.

We are not here advocating a blanket endorsement of the use of pesticides or other chemical treatments as a means of controlling noxious vegetation, aquatic or otherwise. We merely point out that, insofar as such chemical agents are concerned, well considered laws, buttressed by extensive scientific findings, allow their And yet, there are those in use in our state. government who continue to impose on both the citizenry and the environment their opposition to such usage, despite the law. This has already caused considerable hardship. But we concerned even more with the future. arrogance is self-perpetuating. It suggests a state of mind that could preclude these same state officials from readily acknowledging in a timely fashion, any new scientific break through the development of safer, more effective pesticides. By the time they see fit to act, it could be too late for most of our lakes. cite SONAR as an example.

SONAR is the first chemical weed control product developed specifically for use in water and for the select treatment of Eurasian Milfoil. It is, and for several years has been, approved for use in 46 of the mainland states. And yet, attempts to have the chemical registered for use in New York State have languished in the bureaucracy for more than five years. Despite numerous entreaties by various citizens groups, lake associations, concerned individuals and even some badgered public officials, it continues to languish. As of this writing, there is no public record extant that can attest reasonable detail to the existence, validity, or extent of any bona fide, coordinated tests, hearings, investigations, studies and findings that were undertaken by state agencies in an attempt to resolve this matter.

Such a laissez faire approach to government is disturbing enough in any instance. It is even more egregious in this case when one considers the fact that New York State, notwithstanding the potential devastating impact of Eurasian

Milfoil on the already floundering economy, still lacks a coordinated, statewide plan to deal with the problem.

We appeal again for your help. And appreciate anything you can do to bring some sort of order out of this chaos.

Thank you.

Sincerely,

Wendy Davis Chairperson

Coalition of Lakes Against Milfoil

Letter from EPA, John A. Moore, dated 6-2-88 to Dr. Ellen Silbergeld, Environmental Defense Fund.

We appreciate your bringing the <u>Lancet</u> article concerning DMF to our attention and have already taken the steps necessary to begin a thorough review of DMF. We also reevaluated the possible adverse effects resulting from MMF and Sonar. However, having reviewed the data submitted in support of Sonar's registration as well as the <u>Lancet</u> article you provided, we are unable to find evidence showing that the use of Sonar poses an unreasonable adverse effect on the environment and, thus, have no basis to issue an emergency suspension.

We will keep you informed of our progress. If you have any further questions, please contact Edwin F. Tinsworth, Director, Registration Division (TS-767C), 401 M Street, S.W., Washington, D.C., 20460, phone (703) 557-7760.

Please let me know if I may be of further service.

Sincerely yours,

Is! Vic Kaill

John A. Moore Assistant Administrator for Pesticides and Toxic Substances

Enclosures

OPP/PSPO: KHERATH: 557-7102:6/6/88: BEER IV: SONAR

bcc: Anne Lindsay Rick Tinsworth
Jim Akerman Tina Levine
Dick Mountfort Anne Barton

February 24, 1992

Mr. Woody Cole, Chairman Adirondack Park Agency PO Box 99 Ray Brook, NY 12977

Dear Mr. Cole:

My name is Wendy Davis, I represent the Eagle Lake Association's education committee and also the Coalition of Lakes Against Milfoil as their chairperson. I am writing to you with a great concern about APA's permit procedure for milfoil control.

On behalf of a few year-round property owners on Eagle Lake, I called Ray Brook on January 21st for several copies of the application for a permit to hand harvest Eurasian Watermilfoil. A message was left for Mr. Dick Jarvis as to my request.

I was told last summer by Bill Allen our lake association president, that the application was quite a comprehensive form and required tax and deed numbers and signatures. Being that Bill Allen lives away from this area at this time of year, I felt we could help him best by filling our this part of the forms.

The next day (Jan. 22) my husband took a call from Mr. Jarvis and felt Mr. Jarvis was very reluctant to send me any application forms. In the mail on January 23rd, I received a memo from Mr. Jarvis telling me that I would have to contact Bill Allen for the forms (see enclosure). I have contacted Mr. Allen and have received his copy of the forms from Mr. Jarvis.

Upon receiving the forms, I was unable to read them because of the poor qual ty of the copy Mr. Jarvis sent to Mr. Allen. I have also come to the conclusion that these forms were not originally intended for milfoil control. I understand a new simplified application form specifically for milfoil control is being designed. Such an application is badly needed to deal with the milfoil problems that are arising throughout the Adirondack Park.

The Coalition of Lakes Against Milfoil (COLAM) would like to be a part of the making of a simplified permit process and a meeting with you to discuss such a process would be helpful to all parties concerned.

Please contact me to set up a meeting time at: COLAM, PO Box 70, Lake George NY 12845 or telephone me at 585-6686.

Sincerely,

Wendy L. Davis Chairperson Coalition of Lakes Against Milfoil



VILLAGE OF LAKE GEORGE, NEW YORK

12845

ROBERT M. BLAIS

WANDA G. WITT

TRUSTEES
Melvin Brown
Martha LeBlanc
Vincent lannaco
Larry Mancini

BUILDING INSPECTOR
Gerald DeVoe

518-668-5771

January 28, 1987

Alexander Gabrials Box 811 Bolton Landing, NY 12814

re: Milfoil Impact

Dear Mr. Gabrials:

I have attempted to more closely identify the economic impact of the milfoil spread for your use. Assuming the milfoil spreads over the next 2-3 years to the area of our beach and to the west of the Steel Pier, several properties will be impacted.

1.	Loss of our public docks - leased revenue	5,000
	Assuming use by 7,000 boats seasonal to	
	shop in village @ \$10 per boat	70,000
2.	Shoreline Cruise - U-drive rentals/lease	35,000
	user fees	100,000
3.	Para-sail operations (2)	125,000
4.	Boat rental fees on docks	70,000
5.	Cruise boat revenues to private operator	500,000
		\$905,000
	Sales tax revenue	63,000

This loss of revenue is both to public and private owners, and if one realizes the visual impact of the buoys, the warning signs, the weed itself, on the visiting tourists, the ramifications are endless.

I hope this helps and I thank you for your tireless effort and work on our behalf to protect our lake.

Sincerely,

Robert M. Blais, Mayor

RMB/set

ith drowns in ce Minnewana

July 25, 5:01 pm Lapeer County Holt was swimming in Lake Sheriff's Deputies were called to Minnewana at the recreation area. the scene of a drowning at with his 2 brothers and a friend of Metamora-Hadley Recreation area. While attempting to cross the lake, The body of Scott Holt, age 18, of Holt became tangled in weeds and Lapeer was recovered by Sheriff's drowned according to Sheriff's diving team at 7:29 pm. - 1,16 W. Study

Youth drowns in Lake Minnewana

July 25, 5:01 pm Lapeer County Sheriff's Deputies were called to Minnewana at the recreation area the scene of a drowning at with his 2 brothers and a friend. Metamora-Hadley Recreation area. Lapeer was recovered by Sheriff's drowned, according to Sheriff's diving team at 7:29 pm.

Holt was swimming in Lake While attempting to cross the lake, The body of Scott Holt, age 18, of Holt became tangled in weeds and department reports.

FOR WITHEY DAVE

To Whom It May Concern:

On Sunday, August 14, 1988, I went to Eagle Lake to fish with my brother-in-law (Daryle Conlin). We entered the lake at the public launch site. About one hundred feet from the ramp our canoe flipped, throwing both of us under water. My natural reaction to the surprise of the situation was to panic. Having learned drown-proofing my next reaction was to calm myself. I knew that I should automatically rise to the surface with the air that was still in my lungs. Instead of rising, I found that I was unable to move. I was entangled in the dense undergrowth of the lake. I found I could not fight my way to the top. Not being able to rise through the undergrowth, my only alternative was to force my way down to the lake bottom. There I found the footing, to give me the thrust I needed, to push through.

After we got the canoe and our gear to shore, I noticed my tackle box floating away. The box had floated to a shallow part of the lake, about forty feet away. I thought I could wade the short distance to retrieve it. What I found was that the gelatinous milfoil was at least four feet deep. It took me twenty to thirty minutes to retrieve my tackle box, and return to shore. Under normal circumstances this would have taken me five minutes or less.

Without drownproofing and lifesaving training, I am sure I would not have survived. I lived on Eagle Lake for three years during the early 70's. I fished and snorkeled the lake very extensively during that time. The short time that I lived on the lake it grew to be an important part of my life. I care very deeply about Eagle Lake, and the surrounding lakes and ponds. It is still my pleasure to spend time at Eagle Lake, its serenity and beauty is very much a part of me. It is my hope that a solution to the excessive milfoil problem can be made, that will allow the safe use of the lake for generations to come.

Respectfully,

Theodore J. Jacques III 48 1/2 Park Street 1B

Essex Junction, Vermont 05452

meden , Janger To