



**The Cortland-Onondaga
Federation of Kettle Lake Assoc., Inc.**
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Philip Hulbert
NYSDEC
Division of Fish, Wildlife, and Marine Resources
625 Broadway
Albany, NY 12233-4753

Re: New York State DRAFT Aquatic Invasive Species Management Plan

Dear Philip Hulbert,

December 9, 2014

We are writing in support of the *Draft New York State Aquatic Invasive Species Management Plan*, and would like to add our comments, as appropriate.

Our coalition, The Cortland-Onondaga Federation of Kettle Lake Associations, Inc. (C-OFOKLA), is a 501(c)3, non-profit organization. Our mission is to preserve the kettle lakes, surrounding waters and watershed regions in Cortland and Onondaga Counties. We create awareness of lake resources by educating communities about watersheds and their protection, and promoting stewardship of those waterways. Currently, C-OFOKLA includes lake associations from Crooked Lake, Little York Lake, Tully Lake and Song Lake.

As lake stewards, we applaud the intention of this plan and support this critical need. We have been in favor of a fully funded, statewide, aquatic management plan, and are pleased to see this draft.

Our placement at the headwaters of the Tioughnioga River, and Susquehanna River Basin, makes prevention of invasive species here, of critical importance to waters downstream. Seasonally, we also have flow to the Great Lakes Basin, so we are in an interesting hydrogeologic location. We recognize the impact we can have, not only on our lakes, but on the surrounding waters.

The range of invasive species currently in our kettle lakes is varied; some lakes with many, some with very few. In 2012, we worked with the *State University of New York-Environmental Science and Forestry School*, to research the impact of anthropogenic influences on invasive species on our lakes. This study found a direct correlation

between boat traffic and the presence of public boat launches, with the number of invasive species found in each lake. We invite you read this study at [www.Cofokla.org/uploads/ COFOKLA Presentation August 2012-Brainard.pdf](http://www.Cofokla.org/uploads/COFOKLA%20Presentation%20August%202012-Brainard.pdf)

First, we are assuming that “public waterways” includes all of the waterways in New York State, and that as “navigable waters,” all of our kettle lakes would be included by that definition. If the DEC is implying something different, then clarification is needed.

Two of our lakes, Little York and Tully Lake, have public access, but all of our lakes are impacted by boat traffic and fishing. Although our respective lake associations and the C-OFOKLA coalition have been very active in education and outreach, there is a large segment of recreational boaters and anglers who remain unaware of the damage invasive species can create in our waters. We have worked hard to extend education through our lake association members and surrounding communities about these impacts, however the state and county operated boat launches provide access to those who may, or may not, be educated regarding proper boat cleaning, cleaning of fishing gear or use of certified bait. We have also found that there are some people who, through carelessness or indifference, may continue to act in ways that place our lakes at risk. We have seen this first-hand, and know that education, while necessary, is not always an adequate defense. So while we are encouraged that the agency is looking to increase awareness, we also see the need for enforcement.

The question of enforcement remains. How can we, as citizens, enforce the application of best management practices to prevent the introduction of aquatic species into our lakes? We would like to see a definitive means for enforcement actions that we can take. When we see a trailer dripping with weeds, we understand that while we might try to talk to the owner and encourage a behavior change, but we do not have a mechanism to enforce any action, nor should we as citizens be expected to do so. The DEC will address issues of poaching, pollution and other illegal activities with a call to the local office or state hotline and we would like to see the violations of these regulations as actionable offences, as well.

Currently each of our lakes has been negatively impacted by invasive species, and the need for weed harvesting has occurred at some point in time, on all of our lakes. We have also initiated biological control on Song Lake, and there is currently the possible need for chemical control at Little York Lake. The costs for these management controls have a huge impact on our small lakes. As well, there are always additional, often unforeseen, consequences that arise from each of these techniques. We are fully

aware that prevention is the best means of protecting our lakes. To do that, we feel we need a more aggressive approach in dealing with those who choose to violate best practices.

One initiative that may assist to encourage boater caution is to have better exposure online to show where AIS currently have been confirmed. Such action was suggested by the Lake Placid Shore Owners Association, and we would like to see this idea come to fruition. The data is being collected by a variety of agencies and this could be compiled and used at online sites frequently visited by boaters to, and already in, New York.

We are encouraged that the agency sees the need to coordinate with other agencies, organizations and lawmakers, to create a more consistent effort to control, but more importantly prevent, the spread of invasive species. We agree that this should be a priority in the plan.

Regarding the expansion of boat launch stewardship programs for public and private access sites, we agree with this concept, but would like to see specific actions proposed. For example, the DEC could act to coordinate grants to lake associations and other steward programs.

Regarding effective education efforts, we agree that those need to be delivered to target audiences and believe we can help reach those groups and look forward to active participation in supporting these initiatives.

Regarding monitoring, we have, through the Citizen's Statewide Lake Assessment Program and our own watershed associations, provided information and methods to monitor (survey) our lakes for suspicious species and many of us are trained imapinvasive volunteers. We are grateful for the timely responses provided by the New York State Federation of Lake Associations and the NYS DEC, as well as our local soil and water agencies. We have seen how active, volunteer monitoring has helped our lake and encourage continued, uninterrupted funding for these efforts.

We would like to state again that while we see the need for some clarifications, specific actions for expanding boat launch steward programs, extending enforcement for all lakes and for providing a clear mechanism for enforcement, we are in full support of this draft *Aquatic Invasive Species Management Plan*, appreciate the time and efforts of the Working Group, and thank you for the opportunity to comment.

Sincerely,

Tarki L. Heath, President

Karen Lang, Vice-president

Tom Cappa, Treasurer

Evelyn Petit, Secretary

For The Cortland – Onondaga Federation of Kettle Lake Associations, Inc.