

7 November 2008

Dear Meg Modley

The Adirondack Council thanks and congratulates you for the highly informative and cooperative meeting held yesterday in Fort Edward to consider how to prevent invasive species from entering Lake Champlain through the Champlain Canal. We gave brief comments yesterday, and ask that the longer comments below be added to the record. We also ask to be kept apprised of progress toward eliminating the threat of additional invasions of Lake Champlain through the canals, and we offer our help in supporting measures that effectively address this threat.

Again, we thank you. LCBP is helping to keep Lake Champlain a good place for wildlife and people.

Adirondack Council comments on the Champlain Canal to the Lake Champlain Basin Program and New York State Canal Corporation

The Adirondack Council thanks the New York State Canal Corporation (NYSCC) and the Lake Champlain Basin Program (LCBP), as well as such key partners as the Adirondack Park Invasive Plant Program (APIPP), for convening an important meeting on invasive species and the Champlain Canal. The Adirondack Council is a member-supported conservation advocacy and education group dedicated to assuring the ecological integrity and wild character of New York's Adirondack Park. Much of Lake Champlain is within the Blue Line encircling the Park; and many of our members, as well as several of our staff, live in towns along the Lake. The Council has a seat on the Lake Champlain Citizens Advisory Committee, and is involved in land conservation projects in the West Champlain Hills and beyond.

The Adirondack Council urges the NY Canal Corporation and partners to take all necessary steps to prevent invasive species from entering Lake Champlain through the canal. We do not yet know specifically what the best steps are, but we wish to be on record as supporting strong preventive measures even if the initial costs are high. In the long run, the costs of prevention will be much less than the costs – to the lake's *ecology* and to the region's *economy* – of additional invasions and the expensive attempts to control them once they have entered.

Conservation biologists consider *biological invasion* – the spread of non-native species – to rank among the top causes of extinction around the world today, along with the killer threats of habitat destruction, overkill, and global overheating. Motor-boats and launches, roads, canals, and fish-stocking have already sullied Lake Champlain with scores of invasive species. Possible future invaders to the lake include spiny water-flea, viral hemorrhagic septicemia, whirling disease, quagga mussel, Asian clam, round goby, and northern snakehead. Likely vectors for invasive species spread, including canals and roads if not properly managed, could also bring in, on commercial shipments, forest pests and pathogens, such as hemlock woolly adelgid, emerald ash-borer, Asian long-horned

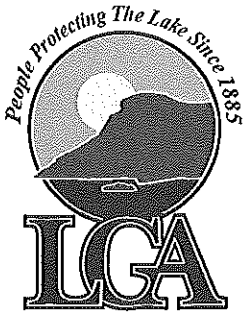
beetle, Sirex wood wasp, sudden oak death, and oak wilt. Neither our lakes nor our forests, neither our towns nor the workers of woods and waters, can long abide such a massive assault on ecological integrity.

Without yet advocating specific improvements in infrastructure, we would emphasize the basics of invasives prevention: *inspection, early detection, and rapid response*. Removal of invasive species should be part of each stage of the prevention process. The Canal Corporation and Basin Program should quickly explore how and where to set up inspection stations so that invasive species can be detected and removed before they enter unspoiled waters. As well, some sort of barrier in the canal will be needed. User education is vitally important but not nearly sufficient.

A more specific recommendation we would make is the formation of SWAT teams – not mere advisory committees, but groups of experts (including biologists and engineers) charged with stopping the problems – to quickly figure out how to prevent the spiny water-flea from spreading beyond the Sacandaga reservoir and removing the Asian clam from the Champlain Canal. These two recent invaders can be repulsed if real actions are taken quickly.

In short, the Adirondack Council supports whatever improvements are needed to prevent canals and boats therein from introducing invasive species. We urge that canals – and roads and boat launches and other vectors – be made as pest-proof as possible, even though initial costs will be high. While the point of initial invasion is often unknown, we do know who often bears the costs of attempting to remedy the situation: local lake associations or small business owners, whose livelihood depends upon the water. The state must take decisive actions to prevent any further spread of invasive species. The biotic and human communities of our region will suffer irreversible harms if all necessary steps are not taken soon to stem the tide of invasions. The Council offers its educational and outreach services in assisting with this urgent work of prevention.

Thank you,
John Davis
Conservation Director



Lake George Association

People Protecting the Lake - Since 1885

November 6, 2008

Lake Champlain Basin Program
54 West Shore Road
Grand Isle, VT 05458

To: Meg Modley and members of the LCBP and NYS Canal Corporations
Partnership

Formed in 1885, the Lake George Association (LGA) is the nation's oldest lake association and one of the first conservation organizations. The LGA is a not-for-profit dedicated to "working together to protect, conserve and improve the beauty and quality of the Lake George Basin."

The devastating ecological and economic impacts of invasive aquatic species are of great concern to the members of the LGA. Lake George is currently infested with Eurasian watermilfoil and Zebra mussels, which require over \$200,000 per year to manage. This past summer, the LGA coordinated a very successful Lake Steward program, which inspected almost 3,000 boats and prevented more than 60 introductions of invasive species into the lake.

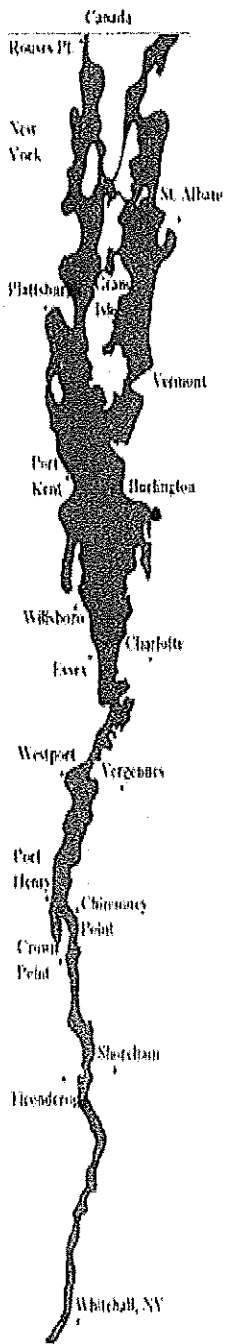
The Champlain Canal represents one of New York's main corridors for the transportation and spread of aquatic invasive species. The Canal's connection to Lake Champlain and its proximity to Lake George and other Adirondack Lakes make the Canal a major pathway for aquatic invasives to be introduced into these water bodies. The LGA strongly urges the Canal Corporation to draft and implement a multi-faceted plan with effective spread prevention elements including education and outreach at all public launch points along the Champlain Canal. Based on the success of the Lake George program, the LGA would encourage consideration of the use of stewards at some of the heavily used launches during peak use times.

Through the Adirondack Park Invasives Program PRISM, the LGA has a very effective working partnership with the LCBP. I would encourage the Canal Corporation and the LCBP to work together to develop and implement an action plan immediately. The LGA is willing to provide any assistance possible.

Sincerely,

C. Walter Lender
Executive Director

**Lake Champlain
Citizens Advisory Committee
Of New York State**



Date: October 30, 2008

To: Champlain Canal Stakeholders Summit Participants

From: Ron Jackson, Chairman LCBP NYCAC

Dear Participants,

Thank you for participating in what we at the NYCAC consider a very important meeting. It has been a long standing goal of the NYCAC to establish a good working relationship between the Lake Champlain Basin Program, the Canal Corporation and the stakeholders in the Lake and along the Canal. The meeting grew out of several meetings with a lot of people working very hard toward a common goal of preventing the spread of aquatic invasive species into and out from Lake Champlain.

In order for this meeting to be productive and the foundation of a relationship that benefits everyone involved, it is vitally important that everyone come to the meeting with the spirit of cooperation and reasonable goals. Inflexible positions and unrealistic expectations will limit progress potentially waste time. Cooperative educational efforts, publicity on potential invasive species, and ways to reduce the chance of invasives getting into the Canal System and the Lake are realistic goals that can be accomplished in the relatively near future and would benefit everyone. Perhaps an obtainable long term goal is establishing a free, voluntary, boat washing service in the canal.

There is no one step method that can eliminate all invasive species from the Canal System or the Lake. Let's strive to work together for obtainable goals that will at least slow down the number of invasives that can invade both water bodies. Further research can perhaps lead to additional steps in the future, so lets establish the foundation of trust and cooperation that will bring positive results to that waters that we all care about or we wouldn't be here today.

Once again, thanks for your concern for the Canal System and the Lake.

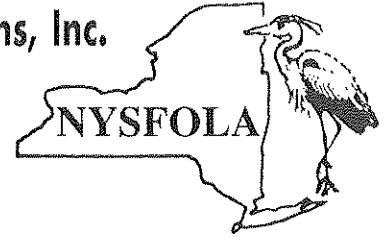
Ron Jackson

Ron Jackson, Chair
Anita Deming
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Clayton Galarneau
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New York State Federation Of Lake Associations, Inc.

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November 6, 2008

Lake Champlain Basin Program
54 West Shore Road
Grand Isle, VT 05458

To members of the Lake Champlain Basin Program and NYS Canal Corporation Partnership:

The New York State Federation of Lake Associations (NYSFOLA) is a not-for-profit coalition of lake associations, lakefront property owners, lake managers, and others dedicated to the “protection of the water resources of New York State by assisting local organizations and individuals through public dialogue, education, information exchange, and collaborative efforts.” As the New York State Chapter of the North American Lake Management Society (NALMS), NYSFOLA represents more than 200 lake associations and 50,000 lake residents concerned about threats to lake water quality, ecological integrity, and public recreational and aesthetic enjoyment of the more than 7,500 lakes and ponds in New York State.

The spread and proliferation of invasive aquatic species are among the greatest concerns for the NYSFOLA membership. NYSFOLA serves on the NYS Invasive Species Advisory Committee and the Northeast Aquatic Nuisance Species Panel, and several members of the NYSFOLA Board of Directors are very active in Partnerships for Regional Invasive Species Management (PRISMS) throughout the state.

The Champlain Canal is a major vector for the transportation of aquatic invasive species. The Canal’s connection to Lake Champlain and close proximity to Lake George and other Adirondack Lakes is cause for concern over the introduction and spread of aquatic invasive species into these water bodies. NYSFOLA feels strongly that the Canal Corporation should develop a comprehensive strategy that focuses on spread prevention involving, but not limited to, education and outreach at public launch points along the Champlain Canal.

NYSFOLA encourages the Canal Corporation to work with the Lake Champlain Basin Program and other members of the Adirondack Park Invasives Program PRISM, as well as the Capital District PRISM, to develop and implement such a plan of action.

Sincerely,

James M. Hood
Chairman, Invasive Species Committee,
New York State Federation of Lake Associations, Inc.
Member, New York Invasive Species Advisory Committee

Position statement on effort to reduce the spread of Aquatic Invasive Species through the Champlain Canal.

**Paul Marangelo
The Nature Conservancy
Vermont Chapter, West Haven Office
West Haven, VT**

The Nature Conservancy welcomes the partnership efforts among the New York Canal Corporation, the Lake Champlain Basin Program and US Fish and Wildlife Service to work towards mitigating the effects of the dispersal of Aquatic Invasive Species (AIS) through the Champlain Canal. The Nature Conservancy has identified AIS as one of the top two threats to the health of Lake Champlain, and believes that addressing the issue of AIS movement through the canal is the single-most effective way to eliminate the most significant pathway for AIS movement into the lake. Accordingly, the need to mitigate the movement of AIS through the canals is urgent, and is highlighted by the following factors:

- Many of the most damaging AIS in Lake Champlain entered the lake via the Champlain Canal, causing millions of dollars in damages and management costs (for example, zebra mussels, water chestnut, white perch).
- Lake Champlain has relatively few AIS relative to adjacent watersheds (the Hudson River, Great Lakes, and The St. Lawrence Seaway) that (with the exception of the Richelieu River between Lake Champlain and the St. Lawrence) were originally hydrologically isolated but are now connected via navigation canals.
- This is important for the health of the Hudson drainage as well, because the canal may disperse AIS from Lake Champlain to the Hudson.

There are a number of especially noxious AIS in adjacent watersheds that will likely make their way to Lake Champlain through the Champlain Canal via natural or human-assisted dispersal over the next few decades (e.g. round goby, quagga mussel, spiny waterflea)

Though a range of strategies might be employed to reduce the spread of AIS through the Champlain Canal, TNC believes that restoration of the hydrological and physical separation that once existed between the Hudson River and Lake Champlain (as generally described in Alternative Three in Malchoff et al 2005 – *Feasibility of Champlain Canal Aquatic Nuisance Species Barrier Options*) is the best and single-most effective option. There are several design approaches that could achieve hydrologic separation between the waters of Champlain and the Hudson without impairing the functioning of the canal as a navigable pathway between Lake Champlain and the Hudson.

TNC urges the partnership to move in this direction by inviting the US Army Corps of Engineers to conduct a feasibility study of barrier options, as authorized by the most recent Water Resources Development Act. There are several advantages to working with the Army Corps on this project; the Corps is authorized to undertake the work at 100% federal cost share, and their work is required to include a robust assessment of alternative solutions to this problem.

Vermont Department of Environmental Conservation

Commissioner's Office

103 South Main Street, 1 South [phone] 802-241-3808
Waterbury, VT 05671-0401 [fax] 802-244-5141

Agency of Natural Resources

November 4, 2008

Meg Modley
Lake Champlain Basin Program
54 West Shore Road
Grand Isle, VT 05458

REC'D NOV 10 2008

RE: Comments on Invasive Species Spread Prevention in the Champlain Canal

The Vermont Department of Environmental Conservation submits the following comments in support of efforts by the New York State Canal Corporation and the Lake Champlain Basin Program to address the issue of aquatic invasive species spread prevention.

Aquatic invasive species including water chestnut, zebra mussels and alewives have had a profound impact on the ecosystem, and natural and cultural resources of Lake Champlain. Lake Champlain has also served as a conduit for expansion of harmful invasive species into inland lakes and ponds throughout Vermont and the region. Numerous other non-native, potentially damaging invasive species, such as hydrilla, quagga mussels and round gobies (to name a few) threaten Lake Champlain and the surrounding region.

Aquatic invasive species enter Lake Champlain and other waterbodies in the region along a variety of pathways, including movement of recreational boats, release of baitfish, aquarium dumping, and passage from the Great Lakes and Hudson River into Lake Champlain via the canal system. (Source: "Feasibility of Champlain Canal Aquatic Nuisance Species Barrier Options," Lake Champlain Sea Grant, 14 November 2005).

Lake Champlain is a vital natural resource that enhances the quality of life for Vermonters and supports Vermont's economy. Protecting the lake as well as other waters in the surrounding region from further degradation by invasive species is a high priority for the Department. More than two million federal, state and local dollars are spent annually in Vermont to manage and control the spread of invasive species. Countless volunteer hours are spent annually on invasive species control and spread prevention activities such as invasive plant removal, boat access monitoring, and surveillance for new infestations and new arrivals.

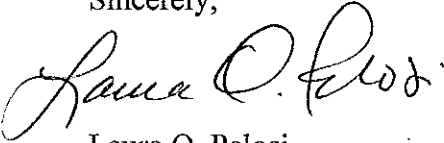
The State of Vermont has instituted numerous regulations and programs aimed at stemming the tide of new aquatic invasive species introductions, addressing as many of the known vectors as possible. Initiatives include:

- The transport, either knowingly or unknowingly, of Eurasian watermilfoil, water chestnut, zebra or quagga mussels to or from any Vermont surface water is illegal (*Title 10, Chapter 47 § 1266.*).
- The movement, sale, procession, cultivation, and/or distribution of certain noxious aquatic and wetland plants are prohibited (*Agency of Agriculture, Food and Markets Quarantine #3*).
- The importation and possession of wild birds and animals in the state is prohibited (*Department of Fish and Wildlife Regulation #81*).

- The sale or use of potentially invasive baitfish is prohibited as is the transport of fish between waterbodies (*Title 10A, Chapter 2 § 122. and 139.*).
- Educational and enforcement activities associated with the laws and regulations described previously are instituted annually.
- Annual public outreach campaigns promote spread prevention methods to boaters, anglers and other recreationists.
- Funding and technical support is provided for locally administered access area greeter programs that offer courtesy boat inspections and invasive species spread prevention education.

The Vermont Department of Environmental Conservation would be happy to work with the Lake Champlain Basin Program and the New York State Canal Corporation to ensure effective spread prevention of aquatic invasive species entering Lake Champlain through the Champlain Canal, and in implementing priority aquatic invasive species spread prevention actions.

Sincerely,

A handwritten signature in cursive script that reads "Laura Q. Pelosi".

Laura Q. Pelosi
Commissioner