



May 30, 2018

Basil Seggos
Commissioner, NYSDEC
625 Broadway
Albany, NY 12233-1010

Dear Commissioner Seggos:

Over the issue of pesticides use in New York state lakes, I have been dismayed at NYSDEC's recent show of disregard for the rights of New Yorkers and their environments to be protected from unnecessary and dangerous exposure to these poisons. I would like to ask you to please investigate the most recent decision regarding the application of pesticides in Mohican Lake (Sullivan County), the NYDEC's conscious choice to reject the concerns and input of impacted recreational users of the lake as well as local residents if they do not own property on the treated waterbody itself, and the seeming disregard of very real environmental and health consequences from the decision that was made.

Over the objections of lake property owners, using a public process that deliberately excluded the comments and concerns of recreational users of the lake and downstream waters, and potentially impacted residents who cannot demonstrate land ownership, NYSDEC Region 3 issued permits last week to allow pesticide applications in Mohican Lake within Sullivan County without resolving substantive environmental issues. NYSDEC was unperturbed by the fact that:

- Mohican Lake property owners did not consent to their best usages being curtailed;
- Wetlands adjacent to and below the lake will be exposed to damaging pesticide concentrations;
- Native aquatic plants will be significantly impacted by the pesticide applications;
- People recreating at Mohican Lake will be exposed to dangerous chemicals without their consent;
- Inaccurate information in the permit applications invalidates SPDES general permit coverages;
- The applicant failed to properly evaluate impacts to Threatened & Endangered species;
- A host of reasonable non-toxic alternatives have not been pursued prior to chemical treatment.

Incredibly, despite significant opposition and consistent participation in the permitting process by concerned property owners, community residents, recreational interests, and environmental organizations, NYSDEC did not immediately notify concerned residents that a permit was issued over their objections nor let them know when chemical application was anticipated.

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We call on NYSDEC to reconsider this permit to allow this ill-informed pesticide application. We urge the NYSDEC leadership to investigate the intentional exclusion of a range of community and recreational interests, the failure to fully consider applicable New York state law, alternatives to chemical treatment, and important potential impacts. Further, we reiterate our call on NYSDEC to meet with the Delaware Riverkeeper Network on this permitting program.

Sincerely,

A handwritten signature in blue ink that reads "Maya K. van Rossum". The signature is fluid and cursive, with a long horizontal stroke at the end.

Maya K. van Rossum
the Delaware Riverkeeper

Cc: Mark Klotz (NYSDEC), Kelly Turturro (NYSDEC Region 3), Catherine Ahlers (NYSDEC Region 3)