



Board of Directors

October 18, 2023

Charles Clusen
Chair

Jason Denham
NYS DEC
Division of Lands and Forests
625 Broadway
Albany NY 12233

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Re: Treatment of Hemlock Woolly Adelgid Infestations

Nancy Bernstein
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Robert Glennon
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Sidney Harring
Dale Jeffers
Patricia Morrison
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Peter O'Shea
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Chris Walsh

Dear Mr. Denham:

We understand that the Department of Environmental Conservation (DEC) intends to apply insecticide in an attempt to kill Hemlock Woolly Adelgid (HWA), a highly invasive and destructive species of insect. According to DEC's Work Plans, the areas to be treated include an area of less than 40 acres in the Hearthstone Campground in Lake George (within the Lake George Wild Forest), and an area of less than 40 acres near the Spruce Mountain Firetower trail (within the Wilcox Lake Wild Forest). The insecticide will be applied to the trees by DEC staff who are certified pesticide applicators or technicians.

While it is PROTECT's general policy that natural and mechanical pest reduction methods should be used before biocides, there are no known natural predators to the HWA and there are no mechanical strategies that can be effectively employed to eradicate HWA.

Staff

Peter Bauer
Executive Director

Accordingly, although biocides should be used only as a last resort, we believe that the application of insecticide in this scenario is an appropriate proposal of last resort to protect Eastern hemlock trees in the Adirondacks from HWA. Eastern hemlock trees make up a large percentage of overall tree species in the Adirondacks and are significant for their contributions to the ecosystems and aesthetics around many Adirondack water bodies. Therefore, we support DEC's attempt to control HWA at this stage. We also support DEC continuing to employ and study the use of biological controls for long-term suppression of HWA. PROTECT does not support the routine, ongoing use of biocides in the Adirondacks.

Claudia K. Braymer, Esq.
Deputy Director

Christopher Amato, Esq.
**Conservation Director
and Counsel**

Protect the Adirondacks

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On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on the proposed treatment of the HWA infestations.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Claudia Braymer,
Deputy Director