



**LEILANI CRAFTS ULRICH**  
Chairwoman

**TERRY MARTINO**  
Executive Director

**MEMORANDUM**

**TO:** Terry Martino, Executive Director

**FROM:** Richard Weber, Deputy Director-Regulatory Programs

**DATE:** April 8, 2015

**RE:** General Permit 2014G-1A Management of Terrestrial Invasive Plant Species In or Within 100 Feet of Wetlands In the Adirondack Park

Please find attached the above-referenced, proposed general permit, along with the authorized user application and certification to use Agency General Permit G2014G-1A. Pursuant to 9 NYCRR § 572.23, staff seek Agency authorization to provide notice and opportunity for public comment on the proposed general permit. After the close of the 30-day public comment period, staff anticipate recommending the proposed general permit, with any changes in response to public comment, to the Agency for approval at its June 2015 meeting.

The proposed general permit allows for the management of terrestrial invasive plant species in or within 100 feet of wetlands in the Adirondack Park by technically qualified and/or trained persons. Terrestrial invasive plant species have demonstrated significant negative effects on native wetland systems in the Adirondack Park, including loss of habitat, negative changes in hydrology and nutrient cycling, and loss of biodiversity. Under GP2014G-1A, authorized users may implement management activities to eradicate or reduce population numbers or otherwise control the growth and spread of terrestrial invasive plant species in wetlands in the Adirondack Park.

Agency General Permit 2014G-1A is a reissuance of Agency General Permit 2014G-1, approved by the Agency in April 2014. GP2014G-1A allows users to conduct management of terrestrial invasive plant species without the need to seek a permit from the Agency for each specific project, so long as the work is done in compliance with specific and defined best management practices, as well as other conditions contained in the general permit. For compliance and tracking purposes, the general permit requires an annual report to be submitted to the Agency documenting all activities undertaken pursuant to the general permit in that year. Currently, the general permit authorizes the New York State Department of Transportation, the New York State Department of Environmental Conservation, the Adirondack Chapter of the Nature Conservancy, the Adirondack Park Invasive Plant Program, and the Regional Inlet Invasive Plant Program use of GP2014G-1.

In reissuing GP2014G-1, one substantive change was made. The reissued general permit continues to authorize the use of the general permit by the organizations previously named, but also allows new users that will be designated by the Deputy Director – Regulatory Programs (DDRP). Users are added to the list through the DDRP's approval of the *Application to Use General Permit 2014G-1A to Manage Terrestrial Invasive Plant Species*. The DDRP will maintain a list of Authorized Users approved to use GP2014G-1A and authorized users not in compliance with the conditions in GP2014G-1A may be removed from the list at the discretion of and upon notification by the DDRP.

Other editorial changes were made to the general permit previously approved by the Agency, but substantively the permit remains the same. Based on the successful implementation of the general permit in the last year, the three year expiration date was eliminated. Other changes include the addition of a procedures section to the general permit, as well as other editorial changes made during the review process.

Pursuant to 9 NYCRR § 572.23, the issuance of a general permit constitutes a Type 1 action for purposes of complying with the State Environmental Quality Review Act ("SEQR"). As required by the SEQR regulations set forth in 6 NYCRR Part 617, I have prepared Parts 1 and 2 of a Full Environmental Assessment Form for the proposed general permit for your review. It is my opinion that the proposed general permit will have no or minimal adverse environmental impact. Accordingly, I recommend that you make and file a negative declaration for purposes of complying with SEQR with respect to the proposed general permit.

If the Agency authorizes staff to seek public comment on the proposed general permit at its April 2015 meeting, staff will proceed to provide public notice of the proposed general permit and opportunity for public comment as required by 9 NYCRR § 572.23, as well as through the Agency's website.