From:	Burnham, Anne < Anne.Burnham@parsons.com>
Sent:	Tuesday, May 26, 2020 11:01 AM
То:	Spellman, John (DEC)
Cc:	tlblazicek@nyseg.com; Philip, Heather; DHollander, Ray
Subject:	NYSEG Clark Street Invasive Species Treatment
Attachments:	Clark Street MGP Invasive Species 052220.pdf

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John-

On behalf of NYSEG, attached is a memorandum detailing the proposed plan for managing invasive species at the Clark Street Former MGP. Please let us know if you have any questions/comments at your convenience.

Thank you, anne

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MEMORANDUM

May 22, 2020

To:John Spellman, NYSDECFrom:Heather PhilipSubject:Clark Street Former Manufactured Gas Plant (MGP) Invasive Species Control

SUMMARY

Clark Street Former Manufactured Gas Plant (MGP) is a 3-acre site in Auburn, New York that has been remediated to commercial-use criteria as per an Order on Consent entered by the New York State Electric and Gas Corporation (NYSEG) with the New York State Department of Environmental Conservation (NYSDEC). The purpose of this memorandum is to establish a protocol for invasive species monitoring and maintenance in accordance with New York state regulations and in support of ecological restoration at the Clark Street Former MGP.

IMPACTS OF INVASIVE SPECIES

An invasive species is one that is non-native to a particular ecosystem and causes, or is likely to cause, economic harm, environmental harm, or harm to human health. Invasive species can dramatically reduce native plant diversity, decrease habitat quality for animals, and influence ecosystem properties like geomorphology, hydrology, biogeochemistry, and disturbance (Hejda et al. 2009; Narango et al. 2018; Gordon 1998). Each year in the United States, invasive species cause damage worth about \$122 billion (Ellstrand and Schierenbeck 2000).

MONITORING AND MAINTENANCE

A regulation adopted in July 2014 by the State of New York prohibits or regulates the possession, transport, importation, sale, purchase, and introduction of select invasive species. The purpose of this regulation is to control the spread and establishment of existing and new patches of invasive species populations (NYSDEC 2014). For two consecutive years, beginning in 2020 with NYSDEC approval, the establishment of invasive species on-site is prohibited, and no species on the NYSDEC's list of prohibited plant species (NYSDEC 2014) may occupy more than 5% of restored areas.

The status of invasive species at Clark Street Former MGP was evaluated on April 28th, 2020 and no invasive species were found. As such, no invasive species control treatments will be employed during 2020. Additional invasive species surveys will be conducted on an annual basis as outlined in the monitoring plan for the site (Figure 1). If any prohibited species are found, the location and size of the population will be recorded. NYSEG will consult with NYSDEC for an approved control method, including the proper disposal of invasive plant material.

DELIVERING A BETTER WORLD

P:\lberdrola_Avangrid\449523 Auburn Clark Street 2018\06 Background Data and Reports\Invasive Species Management\Clark Street MGP Invasive Species 052120.docx

Mr. John Smallman NYSDEC May 22, 2020 Page 2

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