

From: Mike Kelly
To: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Cc: [Mike Kelly](#)
Subject: *** Objection to the proposed use of ProcellaCOR in Lake George ***
Date: Thursday, March 31, 2022 2:09:59 AM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

==> THERE IS SIMPLY NO REASON TO GAMBLE WITH THE STATE OF LAKE GEORGE AT THIS POINT IN TIME. THE ONSET OF CYANOBACTERIA BLOOMS IN 2020 AND 2021 (NEVER BEFORE OBSERVED) INDICATE THAT THE LAKE IS OUT OF ITS NATURAL BALANCE. THERE IS VIRTUALLY NO RESEARCH ON THE EFFECTS OF THIS HERBICIDAL CHEMICAL ON CYANOBACTERIA GROWTH AND TOXIN PRODUCTION. THERE IS NO EMERGENCY WHICH JUSTIFIES THIS ProcellaCOR EXPERIMENT IN LAKE GEORGE AT THIS POINT IN TIME. MR. WICK HAS VOICED ON MANY OCCASIONS, AND IS QUOTED IN SEVERAL MEDIA OUTLETS IN RECENT YEARS, THE ONGOING AND IMPROVING SUCCESSES WITH THE VACUUM ASSISTED HAND-HARVESTING OF THE MILFOIL BEDS, AND THAT THESE METHODS KEEP THIS INVASIVE UNDER CONTROL. AGAIN, THERE IS SIMPLY NO EMERGENCY IN LAKE GEORGE, AT THIS TIME, REQUIRING THE USE OF THIS HERBICIDE. INDEED, THE FACTS UNDERSCORE THAT IT IS NOT NEEDED. THERE ARE MANY OTHER REASONS NOT TO USE THIS HERBICIDE IN LAKE GEORGE (PRESERVING DRINKING WATER QUALITY LEADING THE LIST). THE LAKE GEORGE ASSOCIATION IS COMMUNICATING THESE ADDITIONAL POINTS TO YOU. I STRONGLY SUPPORT THE LGA'S EFFORTS TO PREVENT THE PROPOSED APPLICATION OF ProcellaCOR IN LAKE GEORGE.

Sincerely,

Michael Kelly and Diane Nagengast

5 Honeysuckle Lane,

Lake George, NY 12845

From: Bill D.
To: [APA Regulatory Programs Comments](#)
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 8:40:20 PM

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Leigh R. Walrath^[1]_[SEP]

Adirondack Park Agency
^[1]_[SEP]Ray Brook, NY 12977

RE: APA Project 2020-0004

Dear Mr. Walrath,

As a resident of Pilot Knob who drinks the water of Lake George, please deny the LGPC's current application for the test of the chemical herbicide ProcellaCOR to treat Eurasian watermilfoil because at this point in time the downside is much larger than the upside of such a test.

Given that Lake George is an incredibly valuable environmental and economic resource for all of NYS, there are currently too many unanswered scientific questions to consider using this chemical in our unique lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for HABs arising from increased nutrient loading as a result of herbicide use.

As the LGPC itself proudly attests, they have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program, hence this is the proper approach at his time.

I hope the APA will agree with this assessment and deny the currently proposed test of ProcellaCOR in The Queen of American Lakes.

Sincerely,

William M. Dutcher
1875 Pilot Knob Rd.
Kattskill Bay, NY 12844

From: butlersgcny@optonline.net
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 7:32:40 PM

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Dear Mr. Walrath of Adirondack Park Agency:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time. Let's take the next several years to find out more about this chemical and its effects. Let's not act rashly and put chemicals in our lake which could have lasting harmful effects.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Barbara and Dave Butler

From: pcbrothe@roadrunner.com
To: [APA Regulatory Programs Comments](#)
Cc: pcbrothe@roadrunner.com
Subject: APA Project 2022-0003 Public Comments
Date: Sunday, March 27, 2022 1:49:18 PM

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***** PLEASE NOTE *****

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Please copy "2022-0003, peter brothers, pcbrothe@roadrunner.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: peter brothers
Email from: pcbrothe@roadrunner.com
Address: 12 tall timbers rd 12845
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

When my father (John Theodore 'Ted' Brothers) was involved with the Lake George Association for many years including a tenure as President, the debate about using SONAR was being debated to get rid of milfoil and similar comments were made during the time. It was mentioned by advocates for use of SONAR that it is 'perfectly safe if used in limited quantities.' Never mind that on a bottle of SONAR, the label says 'toxic, hazardous, lethal.' Procella is an herbicide and I don't want this herbicide in a lake that people take their drinking water from. My father, civil engineer, currently 93 and still here, would say the same thing. Recently, to paraphrase, Lake George Park Commission Executive Director Dave Wick conflicted his own belief and/or that of the Lake George Park Commission he is representing. According to an article in Lake George Mirror a couple weeks ago, Mr. Wick said something like 'hand harvesting is working about 80% of the time yet concern is for the other 20% that needs to be taken care of.' Let me mention this again as Mr. Wick was saying - hand harvesting is working 80% of the time. With this kind of success, it seems to be non-burdensome at best to eradicate the remaining 20%+. Yes, hand harvesting has required financial resources yet it is working. Mr. Wick's comments are conflicting at best and we should not follow through with testing as once again, hand harvesting is working. We don't want a chemical used in a body of water that people take their drinking water from.

From: nancyarcher@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: nancyarcher@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 8:23:24 PM

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***** PLEASE NOTE *****

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0003, Nancyann Archer, nancyarcher@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Nancyann Archer
Email from: nancyarcher@gmail.com
Address: 9657 Lakeshore Dr Hague Ny 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: shakshaftann@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: shakshaftann@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 9:11:20 AM

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Please copy "2022-0003, Ann Shakeshaft, shakshaftann@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Ann Shakeshaft
Email from: shakshaftann@gmail.com
Address: 8932 lakeshore Dr #621 Hague NY 12836-0621
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I live in Hague, I do not support the use of pesticides/herbicides in Lake George, I swim in the lake, I drink the water from the lake. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: lynnowilson@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [lynnowilson@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 12:57:13 PM

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Please copy "2022-0003, Lynn O Wilson, lynnowilson@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Lynn O Wilson
Email from: lynnowilson@gmail.com
Address: 3713 Eastman Way, PO Box 180 PO Box 180 NY 12844-0180
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am a scientist and a year-round resident who lives on the shore of Lake George. My ancestors have either lived on the Lake or within walking distance of it since well before the Civil War.

I am strongly opposed to the use of ProcellaCOR EC anywhere in Lake George.

Lynn O. Wilson, Ph.D.
Pilot Knob, NY

From: Rpball2465@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [Rpball2465@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Saturday, April 2, 2022 10:10:27 PM

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Please copy "2022-0003, Robert P. Ball, Rpball2465@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Robert P. Ball
Email from: Rpball2465@gmail.com
Address: 29 Bass Bay Rd Silver Bay NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am writing to oppose the proposed use of pesticides/herbicides in Lake George to control milfoil. As I understand it, ProcellaCOR EC does not have an efficacy history, and Lake George waters should not be a pilot project/experiment — as a truly unique lake and a body of water used for drinking, we should not be applying chemicals that may have adverse implications for the water and those who use it. My family pumps Lake George water directly into our house for dinking, and it would be a mistake to begin putting chemicals in the lake that could have adverse consequences. We should wait for more data to assess whether the use of this product is appropriate and in the meantime focus our attention on other ways to control the milfoil, whether through “weeding”/removal or the use of mats, for example.

Thank you for taking the concerns of those who use the lake water seriously.

From: kcabarry1@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: kcabarry1@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 11:24:25 PM

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Please copy "2022-0003, Kathryn Barry, kcabarry1@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Kathryn Barry
Email from: kcabarry1@gmail.com
Address: 114 Split Rock Rd Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

There are many homes(roughly 1/3 of them) that line the shore of Lake George that draw all their household water from the lake. It must remain potable. Introducing potentially poisonous chemicals into what has been for many many years, a safe potable water supply is simply not acceptable. There are other methods that have been applied over the years that have been moderately successful.

Kate Barry aka Kathryn Barry

From: marybehr@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [marybehr@hotmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 11:30:36 AM

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Please copy "2022-0003, Mary Behr, marybehr@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Mary Behr
Email from: marybehr@hotmail.com
Address: 10 Overbrook Rd Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: jskejumi@nycap.rr.com
To: [APA Regulatory Programs Comments](#)
Cc: [jskejumi@nycap.rr.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 4:52:29 PM

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Please copy "2022-0003, Judy Schultz, jskejumi@nycap.rr.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Judy Schultz
Email from: jskejumi@nycap.rr.com
Address: 44 Overbrook Rd Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides in Lake George.
Getting rid of the milfoil might work with the pesticides but the repercussions on other Environmental issues and the environment has not been studied enough to react so quickly.
Please reconsider doing this. Please also extend the date for peoples comments regarding g this critical issue.
Thank you!
Respectfully,
Judy Schultz

From: thomaswbriggs@sbcglobal.net
To: [APA Regulatory Programs Comments](#)
Cc: thomaswbriggs@sbcglobal.net
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 4:52:26 PM

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Please copy "2022-0003, Elizabeth Anne Booth, D, thomaswbriggs@sbcglobal.net" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Elizabeth Anne Booth, D
Email from: thomaswbriggs@sbcglobal.net
Address: 2049 Glenco TER Fort Worth TX 76110
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: tschaffe7@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: tschaffe7@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 11:06:25 PM

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Please copy "2022-0003, Thomas Schaffer, tschaffe7@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Thomas Schaffer
Email from: tschaffe7@gmail.com
Address: 78 Bobkat Lane, PO Box 586 Hague NY 12836-0586
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am against the use of any herbicide or pesticide in Lake George. I manage a community potable water system that serves 67 households. We draw water directly from Lake George then filter it and chlorinate it. The quality of Lake George is extremely important to those of us that drink this water and do not want to compromise or jeopardize this precious resource.

Regards,

Tom Schaffer
Arcady Bay HOA Water System Manager/Operator

From: kbozony@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: kbozony@hotmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 2:40:03 PM

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Please copy "2022-0003, Kathleen S Lindberg Bozony, kbozony@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Kathleen S Lindberg Bozony
Email from: kbozony@hotmail.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.
Kathy Bozony

From: ktbraico@aol.com
To: [APA Regulatory Programs Comments](#)
Cc: ktbraico@aol.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 10:18:30 AM

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The following public comment was made with your email address as the source.
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Please copy "2022-0003, Kathleen Braico, ktbraico@aol.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Kathleen Braico
Email from: ktbraico@aol.com
Address: 10 Ashley Pl NY 12804-2552
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

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- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.
Kathleen Braico MD

From: alicecres@msn.com
To: [APA Regulatory Programs Comments](#)
Cc: [aliceacres@msn.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 7:59:17 AM

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***** PLEASE NOTE *****

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0003, P Sawyer, alicecres@msn.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: P Sawyer
Email from: alicecres@msn.com
Address: Easton NY
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

EPA concluded that there are 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and "...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling Eurasian Water Milfoil. The APA should keep the Public Comment period open beyond March 31, 2022.

From: jbbrennin@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [jbbrennin@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 11:51:52 AM

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Please copy "2022-0003, Julie Brenninkmeyer, jbbrennin@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Julie Brenninkmeyer
Email from: jbbrennin@gmail.com
Address: 50 Sabbath Day Pt Silver Bay NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I DO NOT support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM).

In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.
JULIE

From: brendabreslin@outlook.com
To: [APA Regulatory Programs Comments](#)
Cc: brendabreslin@outlook.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 6:18:58 PM

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Please copy "2022-0003, Brenda Breslin, brendabreslin@outlook.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Brenda Breslin
Email from: brendabreslin@outlook.com
Address: 50 Pine Orchard Road Hague NY 12837
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George without a great deal of additional study. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and "...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

From: ewrightma7@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [ewrightma7@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 1:07:18 PM

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Please copy "2022-0003, Ellen Wright, ewrightma7@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Ellen Wright
Email from: ewrightma7@gmail.com
Address: 20 Holman Hill Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: fww72@outlook.com
To: [APA Regulatory Programs Comments](#)
Cc: [fww72@outlook.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 11:53:09 AM

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Please copy "2022-0003, Forrest Wright, fww72@outlook.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Forrest Wright
Email from: fww72@outlook.com
Address: PO Box 2444 Silver Bay NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

We do not want to put chemicals in our Lake drinking water. Lake George is the best reservoir with quality drinking water probably in the country. Years ago I took a sample of Lake George water and had it analyzed at an independent water testing lab in Hopewell Junction, NY. When I picked up the report they asked me where the sample came from. I told them directly from my kitchen sink in Silver Bay, NY. The water supply was from Lake George with only sediment filters. They said it was the best quality water they ever tested. Lets keep it that way.

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: gbrownste@aol.com
To: [APA Regulatory Programs Comments](#)
Cc: [gbrownste@aol.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 5:58:29 PM

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Please copy "2022-0003, Glenn Brownstein, gbrownste@aol.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Glenn Brownstein
Email from: gbrownste@aol.com
Address: 2300 Black Point Road Ticonderoga NY 12883
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

We draw our water directly from the lake as do most other homes in our area as well as all around the lake. Because of this I feel any chemical applied to the waters of Lake George could potentially contaminate the drinking water for several thousand people. This is especially scary since there is not that much information on these chemicals and their effects on drinking water. I feel a more aggressive approach to hand harvesting milfoil may be more costly dollar wise but much safer in the long term health of the waters of Lake George!

From: pvburke64@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [pvburke64@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 9:40:06 PM

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Please copy "2022-0003, Patricia Burke, pvburke64@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Patricia Burke
Email from: pvburke64@gmail.com
Address: 67 Mason Road Cleverdale NY 12820
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I don't think enough research on procellaCor's affect on drinking water has been discussed.

From: Joel_f_wright@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: Joel_f_wright@yahoo.com
Subject: APA Project 2022-0003 Public Comments
Date: Friday, April 1, 2022 3:24:06 PM

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Please copy "2022-0003, Joel Wright, Joel_f_wright@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Joel Wright
Email from: Joel_f_wright@yahoo.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM).

From: mcarbognin@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: mcarbognin@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 8:52:58 PM

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Please copy "2022-0003, Matthew Carbognin, mcarbognin@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Matthew Carbognin
Email from: mcarbognin@gmail.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: Jay_jean@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [Jay_jean@hotmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 9:04:59 PM

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Please copy "2022-0003, Jean Yager, Jay_jean@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Jean Yager
Email from: Jay_jean@hotmail.com
Address: 71 BobKat Lane Hague New York
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am strongly opposed to the use of herbicides or pesticides in Lake George. Many of us homeowners draw drinking water from the lake. We do not know the longterm effects of drinking water treated by herbicides. Even small amounts could have deliterious effects on public health. Please do not approve of adding chemicals of this type to our precious lake. Thank you, Jean Yager

From: jyoung615@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: jyoung615@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 10:22:17 PM

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Please copy "2022-0003, Jim Young, jyoung615@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Jim Young
Email from: jyoung615@gmail.com
Address: 50 Sabbath Day Point Silver Bay NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am opposed to this initiative without further beneficial evidence to efficacy and safety. Please stop this and reconsider.

From: holmhill@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: holmhill@yahoo.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 9:11:27 AM

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Please copy "2022-0003, Nancy Young, holmhill@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Nancy Young
Email from: holmhill@yahoo.com
Address: 35 Holman Hill Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM).

The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: chaseblue@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [chaseblue@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 12:11:38 PM

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Please copy "2022-0003, Pamela L. Chase, chaseblue@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Pamela L. Chase
Email from: chaseblue@gmail.com
Address: 3063 Lake George way N Putnam Station NY 12861
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

We are opposed to the use of chemicals in Lake George. It is our drinking water! 97.3% of the herbicide is 'other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant). Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product). EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean? (see attached document from Mass DEP reviewing the product test details). ProcettaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents, and flowing into Lake Champlain would appear not indicative for use of this herbicide. APA conducted monitoring throughout 2021 after Minerva Lake's 2020 ProcettaCOR EC application and "...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was identified?

From: lanceclark49@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [lanceclark49@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 11:52:57 AM

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Please copy "2022-0003, Lance Clark, lanceclark49@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Lance Clark
Email from: lanceclark49@gmail.com
Address: 9657 Lakeshore Dr Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am writing to express my concern at the approval by the LGPC of the experimental use of the herbicide Procella COR for combating milfoil for testing in two locations on Lake George. While I agree that this invasive species needs attention, I understand that entities such as the LGA and the Lake George Water Keeper are opposed to these tests specifically in the waters of Lake George. Further longer term study in other locations is needed before considering its experimental use in Lake George. I would also ask that the period of time for comments be extended so as to more effectively get the engagement and inputs from the sizable portion of land owners and Lake users who are here primarily during the summer months. Thank you.

From: Lsapakoff@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: Lsapakoff@yahoo.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 9:41:13 AM

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Please copy "2022-0003, Laurie Sapakoff, Lsapakoff@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Laurie Sapakoff
Email from: Lsapakoff@yahoo.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: petecoll@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [petecoll@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 8:26:49 AM

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Please copy "2022-0003, Peter Collins , petecoll@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Peter Collins
Email from: petecoll@gmail.com
Address: 14 Hudson Avenue Glens Falls NY 12801
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I have been drinking Lake George water for 85 years.
I am STRONGLY OPPOSED to adding ProcellaCOR to the Lake George water.

From: neilryp@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: neilryp@yahoo.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 9:19:05 PM

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Please copy "2022-0003, Neil Rypkema, neilryp@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Neil Rypkema
Email from: neilryp@yahoo.com
Address: 115 Sabbath Day Point Rd Silver Bay NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

While I'm no pesticide expert, there is no way that broad based application of an unknown pesticide would be effective. Do we remember when DOT was approved and it's affects? Any chemical will become so diluted that it doesn't seem possible to be effective Plus what about the effect on nearby lake drawn water supplies
Please do not approve this treatment
Thank You

From: ddarrin21@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [ddarrin21@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 11:03:22 AM

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Please copy "2022-0003, David Darrin, ddarrin21@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: David Darrin
Email from: ddarrin21@gmail.com
Address: 15 Viewpoint Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Dear APA,

1. I do not support the use of herbicides in Lake George, especially one as unproven as ProcellaCOR EC. Lake George must not be used as an experiment.
2. Postpone the March 31, 2022 deadline for public comment. Morer time & study needs to take place before a well informed decision can be made.

Thank you,
David Darrin

From: Jead22@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: [Jead22@yahoo.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 4:20:44 AM

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Please copy "2022-0003, John E.A.DeGraff, Jead22@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: John E.A.DeGraff
Email from: Jead22@yahoo.com
Address: Box 682 Lakeshore Drive Hague 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Not enough is known about this chemical and it's long term in regards to water safety. We drink this water. This lake should not be used for experiments. See what the Lake George association has concluded! Thankyou!

From: syoung1017@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: syoung1017@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 9:58:30 PM

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Please copy "2022-0003, Steve Young, syoung1017@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Steve Young
Email from: syoung1017@gmail.com
Address: 277 Meadow Glen Drive Middlebury VT 05753-____
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Having been a lifelong resident of the town of Hague, I find the proposed use of this chemical premature. While I understand tests are important, I do not feel the use of this chemical in the designated bays is prudent. I know these bays and water well and the existence of milfoil there is modest at best. While there may be some areas of the lake where milfoil invasion is problematic, I feel the introduction of this type of chemical to be contrary to the long-standing efforts to keep chemicals of any kind out of our waters. I believe the LGPC boat inspection program is an excellent use of resource and significantly increases public awareness. I believe this program will continue to be key tool in protecting Lake George for years to come. As far as dealing with those invasive species that have made it into our waters, there are other non-chemical avenues to take that do not pose a danger to the water quality or those who continue to use of for drinking water, and recreationally.

Please deny the use of this chemical.

From: julia.eve.dubin@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: julia.eve.dubin@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 8:56:00 PM

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Please copy "2022-0003, Julia Eve Dubin, julia.eve.dubin@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Julia Eve Dubin
Email from: julia.eve.dubin@gmail.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

Julia Eve Dubin

From: john.zamrok@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: john.zamrok@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 6:24:44 PM

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Please copy "2022-0003, john zamrok, john.zamrok@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: john zamrok
Email from: john.zamrok@gmail.com
Address: 8940 Lake Shore Dr Jague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

NO Porcella in Lake George. We bring the lake water into our house for cooking and drinking.

From: markafinke@TheCPG.net
To: [APA Regulatory Programs Comments](#)
Cc: markafinke@TheCPG.net
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 5:08:36 PM

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Please copy "2022-0003, Mark A FINKE, markafinke@TheCPG.net" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Mark A FINKE
Email from: markafinke@TheCPG.net
Address: 3854 Lake Shore Drive Diamond Pt NY 14450
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Thank you for the opportunity to offer comments on this significant and impactful proposal. I am hopeful that you will give my concerns an objective audience. I would welcome the opportunity and further discussion, should that be viewed as helpful in informing your decisions.

I apologize if my comments are not as complete and organized as I would have much preferred. However, I only learned about this proposal late Monday and have had very limited time to research the issues, identify data and reports supporting my concerns and draft a reply.

TO: Leigh R. Walrath
RPCComments@apa.ny.gov
APA Project ID: 2022-0004 and APA:2022-0003

FROM: Dr. Mark A. Finke
MarkAFinke@TheCPG.net
(585) 354 - 3747

For background, my grandfather bought our property in Diamond Point in 1947 so I have been a resident and lover of the lake since before I was born! My family has always been a fierce, albeit quiet, advocate for protecting the lake and encouraging and demonstrating responsible and sustainable use. My academic background and research as an Evolutionary Vertebrate Ecologist and a NYS Certified Science teacher make me keenly interested in an aware of issues impacting the lake's ecosystems.

As such, I feel compelled to speak out against this proposal.

I would respectfully request that APA table this proposal and the LGPC withdraw or otherwise suspend their support of this proposal to allow for an adequate and comprehensive review of the available information and completion of additional studies as warranted.

My broad concerns about this proposal and this approval process can be characterized in three areas:

1. Don't use Lake George for an experiment... please! --- Based on the information presented, this product has never been used on a body of water with the water-characteristics and complex & varied ecosystems of Lake George. In my view, it is reckless and irresponsible to move forward when we know so little about the impacts this could have. This is not something that we should expect we will not get a "do over" if an incorrect decision is made

when things go badly. Experiment, first, with this product in a different lake where the water quality and ecosystem has already been altered by human hubris and behaviors. At a minimum, conduct pre-application and long-term, post-application studies in the small lakes and ponds that have been (or will be) identified as potential testing sites. For us on Lake George, we have alternative treatments that are universally recommended and demonstrably effective!

2. What's the rush? --- As I noted, I only learned of this threat to the lake's water quality and ecosystem a few days ago. It is significant, and disappointing, that with only a short time to review the information presented, I found a myriad of issues of concern. In all candor, the process being used to vet this proposal gives the appearance more of going through the motions and ticking off the boxes rather than providing a comprehensive assessment of a project that is designed to have long-term impacts. Why wasn't public comment sought months ago or even last year as this project was developing? The single meeting shared by LGPC was on 3/14 and was based on a presentation first offered in January. Why delay sharing even this information until days before the project proposal was to be reviewed by APA for approval? Surely it is far more important that the correct decision be made based on a thoughtful and comprehensive review rather than a quick one?

3. Insufficient review of the data, issues and impacts. --- Frankly, MY review of the materials should be irrelevant because others who are responsible for this sort of thing should be presenting a comprehensive assessment of their review and findings. As a resident, I depend on these experts and officials to complete assessments and make objective recommendations. Alas, this appears not to have happened in this instance. No disrespect intended, but there is an extremely limited amount of information provided and it is decidedly one sided. The totality of information presented on the LGPC website on this project includes:

- a. Overview – (comments below)
- b. Meetings – A zoom recording of one “public” meeting held on 3/14/2022 (comments below)
- c. Resources
 - i. DEC Permit - 2022 Lake George Blairs Bay ProcellaCOR Pilot Treatment The final permit for the treatment.
 - ii. DEC Permit - 2022 Sheep Meadow Bay ProcellaCOR Pilot Treatment The final permit for the treatment.
 - iii. ProcellaCOR EC DEC Registration Decision - 2/22/2019 The letter from the DEC informing SePro that the product can be registered in NYS.
 - iv. ProcellaCOR Washington State Aquatic Plant Management - EIS - 4/2017 This is a report produced by a consultant working with the product manufacturer to assess the product. It is based on information collected before 2017. Throughout the report, the conclusions are noted with the caveat that more studies are being conducted and peer-reviewed assessments of the results are not available.
 - v. Technical Summary - ProcellaCOR Selective Control of Invasive Watermilfoils 1/28/19 A report by the product manufacturer
 - vi. Vermont ProcellaCOR Review 2020 A one-page comment that notes the application as proposed would not exceed drinking water limits. It is certainly not a review of ProcellaCOR use in VT!

LGPC: ProcellaCOR Pilot Treatment <<< [Link to the website](#)

What's the plan? --- I've added a bullet to this “page” because there doesn't appear to be an overall plan for Milfoil-Management that includes the three elements (i.e., Boat Inspection, Milfoil Harvesting, ProcellaCOR application). Rather, these programs that could/should represent the key elements of an integrated plan are presented independently on different pages. There is a long list of questions I would have about the plan...but, since one is not presented, they may already have been answered! A partial list of these questions include:

- What was the process and criteria by which these specific sites selected?
- These sites do not appear to have been included in other mitigation efforts. Why weren't they and shouldn't they have been?
- What studies or routine sampling are in place or planned to implement to provide on-going monitoring of these sites, sites involved by other mitigation efforts and comparable sites not infested or otherwise encumbered by EWM?
- What are the current contractual obligations and arrangements with SLM?
- What are the proposed contractual obligations and arrangements with SLM?
- Which alternative suppliers and/or experts have offered an alternative proposal to address the issue?
- How are existing mitigation efforts being integrated with herbicide application to leverage the impacts of all efforts in a common effort?
- What other mitigation efforts (not being used) have been evaluated?

- Why were these approaches rejected in favor of the proposed product and process?

If there is interest in drafting a coherent and comprehensive plan that integrates the existing programs into a comprehensive long-term management plan, I would be happy to assist in that process.

- LG Aquatic Invasive Species Prevention Program: A Trailered Boat Inspection Program – This link offers relevant information, is a detailed and well written report on the Trailer Inspection program. Milfoil is at the top of the list in terms of invasives being discovered (and avoided) through this program. But, there appears to be no link described between the impact of this program and the other EWM programs.

- LG Milfoil Project Annual Report 2021 – Again, an excellent report with superb graphics. But, no mention at all of how this program is (or is not) part of an integrated and comprehensive Milfoil-management program.

- ProcellaCOR Pilot Treatment –

- o Overview – This overview is very clear, concise and well written. However, the tone and content sound more like a takeoff on a beer commercial and is intended as a sales pitch for ProcellaCOR (Great Results! Less Cost! No Problems!)... rather than an introduction to an objective and science-based assessment of the risks and benefits of using this herbicide in the lake.

- o The overview includes encouraging suggestions that the page will offer substantive information about the project including:

- Reports on the 30 lakes in NYS where the product has been used
- Reports on the more than 100 sites throughout the Northeast on product use
- Minutes and reports on the discussions from the “many”:

- a. public outreach with local homeowners,
- b. meetings with town officials
- c. discussions with other interested lake associations

Unfortunately, there is only a single zoom session on a municipal meeting on 3/14.

- Meetings – A zoom recording of one public Municipal meeting held on 3/14/2022 This record is just a recorded zoom meeting. There are no supporting notes, comments or any documentation to make the substance of the meeting more easily heard and understood. It would have been helpful to at least have a list and contact information for the attendees to allow for follow-up and further discussions. There were many questions that viewing this session raised for me. The following are a few that come immediately to mind:

- Is this the first and only meeting with this group of Municipal representatives?
- If there were other sessions, what information, minutes or notes are available for those meeting(s)
- What background information and documents were distributed in advance of the meeting to allow participants to come prepared for discussion?

- It seems clear from the very few comments and questions asked that participants were not provided with sufficient background and supporting documentation so that they could have been adequately prepared.

- It was disappointing that the concern about “two headed monsters” emerging as a long-term consequence of putting this chemical into the lake was summarily dismissed. A more appropriate response would have been to acknowledge that there have been no long-term studies performed.

- Regarding this paucity of data...it is disingenuous to state that there are no long-term problems and suggest that there won't be problems in the future. The observations that “there are no problems” from using this product doesn't mean that there aren't any. Rather, it just highlights that the studies needed to look for them haven't been performed.

- The focus of the meeting was clearly the presentation from the vendor supplying and applying the herbicide. Were there similar presentations for other folks suggesting an alternative approach or raising concerns about this herbicide?

- During the discussion a comment was made about a “Memorandum of Understanding” that specifically precludes using products such as this herbicide in the lake. Why was this MOU not posted on the site and included in the discussion and justification (or not) for using this product?

- The conversation related to the MOU, such as it was, was on circumventing and avoiding the law! Apparently, a factor in selecting these specific sites was that the MOU didn't apply...the discussion about and information available about this issue was distressingly missing from this meeting and, apparently, the evaluation of the suitability of using this product. Did it occur that perhaps we should be adhering to this regulation rather than trying to find a way to circumvent it? It was put in place to protect the lake.

- During the discussion a comment was made (I couldn't determine who had said it) to the effect that there was no public opposition to this program that offers great benefits. (Great Results! Less Cost! No Problems!) It is my understanding that this statement is false. The LGA and the LG Waterkeeper do not support the use of herbicides in Lake George, especially one as unproven as ProcellaCOR.

- The Lake George Association (LGA) is concerned that the work at Minerva Lake doesn't constitute enough

long-term evidence of the herbicide's safety. Some factors have to be measured over a lot of time. "The LGA has serious concerns about the use of ProcellaCOR, or any herbicide or chemical agent, as a test against milfoil until much more extensive scientific research is done to determine the immediate and long-term residual impact on the lake's chemistry and integrated food web," said LGA Chairman Jeff Killeen and Vice Chairman Peter Menzies. "We have begun working with the Lake George Park Commission to address our concerns and focus on priority research recommendations to ensure that informed decisions are made to realize the strongest possible protection of Lake George." The LGA currently funds the Lake George Park Commission's milfoil management program, which consists of employees harvesting milfoil out of the lake by hand, so as to minimize harm. The association's plan is to continue pushing that plan forward. New York Gov. Kathy Hochul has proposed an increase in state funding that could lead to more funds that the LGA could work with.

- The LG Waterkeeper Chris Navitsky "...encourages everyone interested in protecting water quality to express concern over the LGPC proposal to use herbicides in Lake George for Eurasian watermilfoil treatment. Lake George must not be used as an experiment."
- Several participants noted their surprise that there had been such limited response to mailings sent to the residents within the 100-acre zone that would potentially be impacted by the treatment. Although, it was noted that there were only four properties with homes in one of the treatment sites.
- There was no discussion about how effective the outreach offered had been nor concerns voiced that additional actions should be taken to ensure a robust public discussion of this issue.

- Resources The documents offered in this section are clearly related to this project and do offer some relevant information however, they offer a very limited base of information for making an objective assessment of the value and impacts of using this herbicide in Lake George.

SOLitude Lake Management <<< Link to the website from which the following information was retrieved.

- As a SePRO Preferred Applicator, SOLitude Lake Management utilizes the most advanced products and practices. While preventative measures are the preferred management approach, if possible, the success of this treatment (ProcellaCOR) demonstrates a new and exciting long-term management strategy that can be employed throughout the country in areas where this highly invasive plant has already taken over.
 1. What other vendors or project experts have provided a proposal, documentation and/or support in background research for this initiative?
 2. What are the contractual commitments (i.e., current and proposed) regarding SLM's participation?
 3. What entity has liability for any negative impacts...both short and long-term? For the initial application, the permit(s) identify the Permittee, LGPC is responsible. Does either SLM or SePro have any liability associated with this product?
- Lake and Pond Products: When it comes to providing you with unparalleled lake and pond management services, SOLitude uses only the highest quality lake and pond management products. Of course, since saving money is important to any business operation, we do have a catalog of lake management products available for direct purchase at affordable prices. By selling directly to you, we eliminate the middleman and other traditional distribution networks and streamline our own operation to minimize staff and other overhead. Which products/services and cost are included in SLM's proposal?
 - o Aquatic Herbicides & Algaecides
 - o Biologicals
 - o Lake And Pond Dyes
 - o Water Testing Products
 - o Goose Repellants
- SOL Pro Annual Management Plans: Keeping your lakes, ponds, and fisheries ecologically balanced and beautiful isn't a one-time job. It requires consistent, proactive care by highly trained lake management professionals – and that's exactly what you get with your SOL Pro Plan. All descriptions related to this issue include the notion that any treatment must be part of a comprehensive and long-term management plan. Are these SLM programs included in LGPC's plan? If so, what are the details of SLM's participation and expectations of results.
 - o Premium: Complex ecosystems have complex problems. By leveraging proactive management solutions, superior data, cutting-edge technologies and your dedicated support team, we'll achieve the trifecta of impeccable beauty, functionality and aquatic health
 - o Plus: When you look past the water's surface, it's possible to identify imbalances before they physically reveal

themselves. Cover all the bases plus enjoy increased site visits, advanced water quality assessments, and peace of mind with permitting assistance.

- o Essential: A healthy waterbody is built on a solid foundation of advanced knowledge and preventative techniques. Short-term Band-Aids just won't cut it, which is why we set the groundwork with the future in mind. When you start ahead, you stay ahead.
- ProcellaCOR use: A search of the website using the term ProcellaCOR returned 26 results. Many were using the term as part of a general discussion of herbicide use. A few offered information potentially relevant to use on LG.
- o Lake Water Use Restrictions: NH Lakes and Ponds - Lists ca 20 instances of application of ProcellaCORE that required "use restrictions" following application.
- o Case Study: Controlling Milfoil In Lake with ProcellaCOR - This is a 500-acre waterbody in Fairlee, VT. While much of the surrounding area is undeveloped, parts of the lake are lined with residential homes. The information provided describes the eradication of the milfoil but, no data or comparative assessments or any other measures of the impacts of the herbicide application were provided.
- o Case Study: Managing Invasive Watermilfoil in Reservoir - A large 30 surface acre drinking water storage reservoir serves the growing population of more than 25,000 people. The lake is classified as a "no contact" waterbody, which prohibits swimming, wading and boating, but is otherwise open to the public for recreation and fishing. This unique ecosystem of the lake and surrounding landscape is home to several species of warm-water fish, waterfowl, birds, amphibians, and other small mammals. The information provided describes the eradication of the milfoil. However, other than the comment... "Ultimately, fishing access within the reservoir was restored and the vegetation clogging the pumps was no longer a concern to the town."...no data or comparative assessments or any other measures of the impacts of the herbicide application were provided.

Wisconsin Department of Natural Resources

The Wisconsin Department of Natural Resources has a wide variety of resources. Below are two that I happened to find that are relevant to this project.

Florpyrauxifen-benzyl Chemical Fact Sheet

- Desirable native species that may also be negatively affected include waterlily species (*Nymphaea* spp. and *Nuphar* spp.), pickerelweed (*Pontederia cordata*), and arrowhead (*Sagittaria* spp.). This report offers evidence that the herbicide could negatively affect other plants.
- It is important to note that repeated use of herbicides with the same mode of action can lead to herbicide-resistant plants, even in aquatic plants. Certain hybrid Eurasian watermilfoil genotypes have been documented to have reduced sensitivity to aquatic herbicides. In order to reduce the risk of developing resistant genotypes, avoid using the same type of herbicides year after year, and utilize effective, integrated pest management strategies as part of any long-term control program. As noted above, the LGPC has not provided any details or plan for management strategies as part of a long-term control plan that incorporates the use of this herbicide. Thus, this issue appears to not being addressed.

WI-DNR: Aquatic Plant Management Research Updates APM Industry Meeting January 27, 2022

- Field evaluation efforts in 2020 & 2021 also provided evidence which suggests that the observed impacts following some of these localized ProcellaCOR treatments are extending to areas beyond the immediate treatment areas. This observation supports conducting additional research to better understand the variables which influence scale of treatment and associated impacts. This statement, based on a two-year study of the impacts of ProcellaCOR, emphasizes the need for further study.
- Statistically significant declines were observed with some native plant species, particularly several dicots (i.e., northern watermilfoil, water marigold, white water crowfoot, etc.), while other native plant species did not exhibit any statistical changes. This report offers evidence that the herbicide could negatively affect other plants.
- Additional data on native plant selectivity collected at one YAT on a small sub-set of lakes observed sustained reductions in the native plant species which exhibited initial declines following treatment. This report offers evidence that the herbicide could negatively affect other plants.

Massachusetts Department of Environmental Protection
ProcellaCOR Herbicide Product Summary and Use Restrictions

- “...this product may be applied for management of freshwater aquatic vegetation in slow-moving or quiescent waters with little or no outflow.”
- Fish studies: In the study with the EC formulation on common carp no mortalities were observed and non-definitive LC50 of >3.2 mg a.i. equivalent/L and NOAEC of 3.2 mg a.i./L. Sub-lethal effects (surfacing and/or lethargy) were observed in all fish in the 3.2 mg a.i./L group throughout the study. This report offers evidence that the herbicide could negatively affect fish and/or invertebrates. Highlights include:
 - Aquatic invertebrates: The EC formulation is moderately toxic to water flea with an EC50 of 1.32 mg a.i. equivalent/L. This report offers evidence that the herbicide could negatively affect fish and/or invertebrates.
 - Risk Mitigation The product label for ProcellaCOR EC Herbicide includes a number of statements and instructions that mitigate risks to non-target organisms. In addition to these label instructions, MDAR and MassDEP have additional recommendations and restrictions, some of which supersede some of the label restrictions. Label statements for ProcellaCOR EC Herbicide include the following advice:
 - o Environmental Hazards Under certain conditions, treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants, which may cause fish suffocation. Water bodies containing very high plant density should be treated in sections to prevent the potential suffocation of fish. This report offers evidence that the herbicide could have broader impacts on the ecosystem.
 - o Resistance Management ProcellaCOR EC is classified as a WSSA Group 4 Herbicide (HRAC Group). Weed populations may contain or develop biotypes that are resistant to ProcellaCOR EC and other Group 4 herbicides. If herbicides with the same mode of action are used repeatedly at the same site, resistant biotypes may eventually dominate the weed population and may not be controlled by these products. Unless ProcellaCOR EC is used as part of an eradication program or in a plant management system where weed escapes are aggressively controlled, do not use ProcellaCOR EC alone in the same treatment area for submersed and emergent plant control for more than 2 consecutive years, unless used in combination or rotated with an herbicide with an alternate mode of action. As noted above, the LGPC has not provided any details or plan for management strategies as part of a long-term control plan that incorporates the use of this herbicide. Thus, this issue appears to not being addressed.
- o For applications to invasive freshwater aquatic vegetation in slow-moving/quiescent areas of rivers (coves, oxbows or similar sites), users must be aware of relevant downstream use of water for irrigation that may be affected by the treatment and must ensure all label restrictions are followed. All potential downstream water intakes with irrigation practices that may be affected by the treatment must be documented and affected irrigation users notified of the restrictions associated with such treatment. Lake George is hardly a quiescent body of water. As such, based on the application guidelines presented, using this product in Lake George would not be appropriate. Moreover, SLMs calculations that a less than 8-acre application area would have an impact on ca 100 acres of the lake adjacent to the application site, would seem to suggest that using this product in a large lake that experiences significant wave and current impacts on water cycling and flow is more problematic than use in the small lakes and ponds of past applications. The state, EPA and product-use documents also highlight that approval for use is restricted to bodies of water with... “with minimal or no outflow” ... Again, LG doesn’t meet this requirement for using this product.

From: ladamson27@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: ladamson27@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 12:15:52 PM

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Please copy "2022-0003, Elizabeth Lisa Adamson, ladamson27@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Elizabeth Lisa Adamson
Email from: ladamson27@gmail.com
Address: 128 Lake Parkway Lake George NY 12845
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

May this serve as comment for both proposed ProcellarCOR herbicide projects at both Lake George sites. Many residents around the Lake oppose any introduction of chemicals (especially ones like ProcellarCOR whose full roster of ingredients are not disclosed and which when they break down just break down into further non degradable toxins which don't break down) into their drinking and recreational water. At a time when those who are working for Lake health are struggling to address rising pollution stemming from over development, stormwater, septic and fertilizer impact in a wholistic and best practices way, to have such an experimental project with an untested aquatic herbicide in this environment introduced into our water is most concerning.

Many of us are just hearing about this alarming proposal right now, as the public comment period was not widely enough publicized and provides only a short window for people to understand the implications of this experiment and to respond.

I urge you to extend the public comment period so that you can hear people's concerns. My understanding is that ProcellarCOR, once introduced, will rapidly spread into up to a 5 mile radius within a very short period of time, and it is unknown how it will affect fish and wildlife, plants and humans and how far it will ultimately travel . What happens in one end of the lake eventually affects the whole lake, however seemingly minute. Milfoil is an issue but harvesting it, though labor intensive, has been relatively effective; why risk the very possible unintended consequences including on going increased dependence on new chemicals once the Milfoil becomes resistant to ProcellarCOR; why risk long range poisoning or accumulation with other toxins in the water just because it is easier short term to control milfoil for a season or so, or worse perhaps that it is profitable to some companies?

We are in an accelerated period of ecosystem stress from an onslaught of human impact, and daily we become aware of the negative effects of ubiquitous chemicals on our air and water and soils globally.

Activists around the state are hearing about this project and are appalled. A groundswell of residential opposition is likely to grow as people hear of this, and it would make sense to respect public opinion rather than push through too quickly a practice that is not necessary in this delicate lake, once so pristine but arguably threatened by increasing practices such as chemical introduction.

Lisa Elizabeth Adamson
Lake George

From: watercars@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [watercars@hotmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 3:36:37 PM

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Please copy "2022-0003, Cris Ginn, watercars@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Cris Ginn
Email from: watercars@hotmail.com
Address: 8979 Lake Shore Drive Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

After reading everything I could find, I don't believe it's a good idea to use this chemical in Lake George. In my opinion, we should keep pursuing non-chemical means to fight milfoil. For the years I have been following this fight, it seems like we're making progress. Thank you, Cris

From: sgraves4@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: sgraves4@yahoo.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 10:09:47 PM

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Please copy "2022-0003, steve graves, sgraves4@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: steve graves
Email from: sgraves4@yahoo.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: Hgrice99@icloud.com
To: [APA Regulatory Programs Comments](#)
Cc: Hgrice99@icloud.com
Subject: APA Project 2022-0003 Public Comments
Date: Sunday, March 20, 2022 5:38:20 PM

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Please copy "2022-0003, Helena Rice, Hgrice99@icloud.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Helena Rice
Email from: Hgrice99@icloud.com
Address: Bluff Head Rd Huletts Landing NY 12941
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

My concern is that the repeated use of herbicides could lead to herbicide-resistant plants. According to the Wisconsin Department of Natural Resources, "Certain hybrid Eurasian watermilfoil genotypes have been documented to have reduced sensitivity to aquatic herbicides." If this is approved it should only be used in extreme situations where the current methods are somehow not effective. The last thing we want in Lake George is a genetically altered milfoil that is now resistant to the very thing meant to mediate the weed. I would ask the LGPC to seriously consider the approval of this chemical into our Lake. Current methods have been working to keep the lake usable and clean. Such drastic measures should only be considered when other methods are no longer working. Thank you for your careful consideration of this matter.

From: janicereynen@mac.com
To: [APA Regulatory Programs Comments](#)
Cc: [janicereynen@mac.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 10:04:21 PM

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Please copy "2022-0003, Janice Reynen, janicereynen@mac.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Janice Reynen
Email from: janicereynen@mac.com
Address: 172 Packard avenue Wyckoff NJ 07481
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Dear Sir/Madame,
LG is drinking water. No chemicals at all. Hand harvest EMF. "Practically" non-toxic means it IS toxic to some degree.

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

In appreciation,
Janice Reynen

From: reynenchris@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [reynenchris@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 10:05:32 PM

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Please copy "2022-0003, Chris Reynen, reynenchris@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Chris Reynen
Email from: reynenchris@gmail.com
Address: 172 Packard Ave. New Jersey 07481
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: haguesteve@msn.com
To: [APA Regulatory Programs Comments](#)
Cc: haguesteve@msn.com
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 12:11:44 PM

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Please copy "2022-0003, Steve Ramant, haguesteve@msn.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Steve Ramant
Email from: haguesteve@msn.com
Address: 96 Pine Orchard Rd Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I'm Steve Ramant, Deputy Supervisor, Town of Hague and I'm writing you to STOP the LCPC from using Procella COR in Lake George. I'm very concerned about the potential effect on Hague residents and guests who use Lake George as their drinking water source.

Lake George is rated Class AA-Special by The Department of Environmental Conservation's Water Quality Standards Program. This is the highest rating that does exist. New York State regulations define Class AA-Special as best used as a source of water supply for drinking, culinary or food processing purposes. In addition the waters shall be suitable for fish, shellfish, wildlife propagation and survival. In addition Lake George is used for contact recreation and fishing. Also it's stated that there shall be no alteration to flow that will impair the waters for their best usages.

When reviewing the data sheet for Procella COR it's noted that 2.7% of formula is florpyrauxifen-benzyl but the other 97.3% of ingredients are proprietary. Does The APA know what they are? Probably not. Are the potentially harmful to humans? This is a MAJOR CONCERN!

I'm aware that the APA approved this to be used in Minerva Lake. Upon researching where the residents of this waterbody get their drinking, I found that it comes from 2 ground wells that serve the 800 residents. It looks like they're not exposed to drinking Procella COR as Hague resident will be if the proposed treatment goes thru. All of you at APA please ask this question, which water would you want to drink? My bet is that none of you said Lake George if this Procella COR is used in this Class AA-Special waters.

I'm also floored that LGPC & APA have NOT set up dates for Public Hearings on this extremely IMPORTANT issue so Lake residents could voice their concerns in a public forum. I find that very disturbing. In Hague, our Town Board, uses such hearings on many issues as a normal course of business. Therefore please extend the deadline of today and initiate such Public Hearings at ALL of the Towns who are on Lake George. This is the proper and correct way to move forward. Let the Public have their say!

I look forward to APA, who I have great respect for and LGPC, who I personally have worked very close with on

many Lake issues, to do the proper thing and stop moving forward with Procella COR until the Lake residents have their say.

Thanks you,
Steve Ramant

From: scott.ireland.ala@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: scott.ireland.ala@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 1:57:06 PM

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Please copy "2022-0003, Scott Ireland, scott.ireland.ala@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Scott Ireland
Email from: scott.ireland.ala@gmail.com
Address: 1417 Charley Hill Rd New York 12870
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Adirondack Park Agency
P.O. Box 99
133 NYS Route 86
Ray Brook, NY 12977

Dear Adirondack Park Agency,

The Adirondack Lakes Alliance (ALA) writes in support of the Lake George Park Commission's (LGPC) application for the use of ProcellaCOR EC in the areas of both Blairs Bay and Sheep Meadow Bay. In addition to our mission of reducing the spread of Eurasian watermilfoil (milfoil) throughout individual lakes, our concern remains with the potential for the carriage of aquatic invasives into other waterbodies in the Adirondacks. We know that elimination at the source is the first step in reducing the growth and spread of such invasives, and ALA fully supports LGPC's request for permits to treat milfoil in the impacted areas. We believe the application of ProcellaCOR to be an important component of a comprehensive invasive management strategy and is not considered to be a stand-alone solution to the eradication of such infestation. Continued monitoring and inspection of boats as well as visual inspections of the lake bottom after such treatment will not only increase the effectiveness of the herbicide application but will gather much needed data for other lake communities within the Adirondacks that are also considering the use of herbicidal removal.

In 2020, Minerva Lake piloted chemical treatment of milfoil using ProcellaCOR. This was the first use of this chemical treatment in the Adirondacks. Results were very positive. While new to the Adirondacks, ProcellaCOR has been used in over 75 sites across the northeast with a consistent track record of successfully reducing milfoil abundance with minimal non-target impacts.

ProcellaCOR is an extremely targeted herbicide that uses a low dosage and has a short residence time in the water. It has been approved by the U.S. Environmental Protection Agency and by the NYS Department of Environmental Conservation for use in waterbodies designated for swimming, fishing, and drinking water.

LGPC is an important partner in the efforts to reduce the impact of invasive species in the Adirondacks. We look forward to learning from their efforts to control milfoil in Lake George.

Thank you for your consideration of our comments.

Respectfully,

Scott Ireland
Executive Director, Adirondack Lakes Alliance
scott.ireland.ala@gmail.com
+1.585.465.1753

From: tailwindjunglelodge@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: tailwindjunglelodge@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 7:35:49 PM

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Please copy "2022-0003, Tamara Jacobi, tailwindjunglelodge@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Tamara Jacobi
Email from: tailwindjunglelodge@gmail.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I married into a family with a place on Lake George. We drink from the water and our kids play all summer in the lake...us too! My in-laws live there full time.

So please don't put a chemical into the that we don't fully know enough about. A few years figuring out more on the potential issues, will not impact the overall challenge of invasive species.

Tamara

From: fshhf99@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [fshhf99@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 7:31:33 PM

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Please copy "2022-0003, KB, fshhf99@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: KB
Email from: fshhf99@gmail.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Please don't put anything more in the lake we drink from.

Thank you

From: patriciapengitore@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [patriciapengitore@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 5:51:43 PM

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Please copy "2022-0003, Patricia pengitore, patriciapengitore@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Patricia pengitore
Email from: patriciapengitore@gmail.com
Address: 115 Overbrook Road
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Please don't allow herbicides to be used in our beautiful lake.

From: rkingsb@pacbell.net
To: [APA Regulatory Programs Comments](#)
Cc: rkingsb@pacbell.net
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 2:41:53 PM

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Please copy "2022-0003, Richard F Kingsbury, rkingsb@pacbell.net" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Richard F Kingsbury
Email from: rkingsb@pacbell.net
Address: 42 Forest Bay Rd N Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

We drink lake water(filtered and UV treated) but we still do not want to see herbicides used in the lake.

From: otsjohnny@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: otsjohnny@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 10:12:33 PM

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Please copy "2022-0003, Johnny Miller, otsjohnny@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Johnny Miller
Email from: otsjohnny@gmail.com
Address: 8004 Lake Shore Drive Silver Bay NY 12866
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I vote NO to ProcellaCOR EC to control Eurasian Watermilfoil within a 3.6-acre area of Sheep Meadow Bay, Lake George.

From: ginger@utopianstate.com
To: [APA Regulatory Programs Comments](#)
Cc: ginger@utopianstate.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 2:35:03 PM

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Please copy "2022-0003, Ginger Henry Kuenzel, ginger@utopianstate.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Ginger Henry Kuenzel
Email from: ginger@utopianstate.com
Address: Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

To Whom It May Concern:

I urge you to withhold approval for the use of Procella COR in Lake George. My objections are based on the following:

1. 97.3% of the herbicide is 'other Ingredients'. We don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
2. Per Sepro, the manufacturer, the product use may result in herbicide resistance (it notes that after two applications, you should use another Sepro 'integrated pest management strategy' product).
3. EPA concluded that there are 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
4. ProcellaCOR EC is recommended for use in 'slow moving/quiescent waters (tranquil, inactive water). This is not the profile of Lake George, so why would we use it here?
5. Your agency conducted monitoring throughout 2021 after Minerva Lake's 2020 ProcellaCOR application and "...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was identified?

I also request that you keep the Public Comment period open beyond March 31, 2022 in order to give residents and other stakeholders the opportunity to review the information about Procella COR and submit their comments to you. Thank you for your attention to this urgent matter.

Regards,
Ginger Henry Kuenzel

From: mennisb@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: mennisb@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 10:54:22 AM

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0003, Bernice Mennis, mennisb@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Bernice Mennis
Email from: mennisb@gmail.com
Address: 446 Sly Pond Rd, Fort Ann NY 12827
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am writing in strong opposition to the use of pesticides/herbicides in Lake George, in particular ProcellaCOR EC which lacks a efficacy history and poses grave danger to our precious clear beautiful lake: evidence from scientific studies may cause cancer, disrupt hormonal systems, and cause damage to liver and kidney; Per sepro may result in herbicide resistance requiring more and more chemicals; 97% of the herbicide is listed as "Other ingredients" which you do not declare. I moved to my home 42 years ago because of the beauty of the Adirondacks. My road dead ends at Shelving Rock, on Lake George. Do not endanger what is precious, what provides drinking water, the flocking of tourists, and an incredible "gem" for all to enjoy. Please extend the comment area and please listen to those of us who know the grave danger this chemical could pose. Thank you for listening to voice of reason and care, Bernice Mennis

From: pmcdowel@twcny.rr.com
To: [APA Regulatory Programs Comments](#)
Cc: [pmcdowel@twcny.rr.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 8:16:54 PM

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Please copy "2022-0003, Martha McDowell, pmcdowel@twcny.rr.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Martha McDowell
Email from: pmcdowel@twcny.rr.com
Address: 3183 Oakley Way Kattskill Bay NY 12844
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

To the APA Board:

I urge you to stop all consideration of using any herbicide to control milfoil in Lake George. As a fifth-generation resident of the lake, I have always supported work to keep any foreign substances out of its waters.

While milfoil is a very real threat to the lake, it is far better to use harvesting or other non-chemical means to control its spread. It is the responsibility of the APA to protect the lake's clean waters, rather than setting a terrible precedent by introducing herbicides anywhere on the lake.

In addition, I urge you to extend the deadline for comments on this subject well beyond the March 31st deadline, since so many who care about the lake have not yet learned about this threat to its waters.

Sincerely,

Martha R. McDowell

From: leannalenhart43@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: leannalenhart43@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 4:11:07 PM

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Please copy "2022-0003, Leanna Lenhart, leannalenhart43@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Leanna Lenhart
Email from: leannalenhart43@gmail.com
Address: 1827 STONY CREEK RD Athol NY 12810-1915
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I oppose the use of this herbicide until further testing has been conducted to certify the effectiveness of this product. Also How do we know that other plant life will not be impacted by this herbicide? How does it know only to go for the Eurasian milfoil and not the natural plants that grow in the lake?

From: donna@nlgrealty.com
To: [APA Regulatory Programs Comments](#)
Cc: donna@nlgrealty.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 7:34:19 PM

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0003, Donna Levenstien, donna@nlgrealty.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Donna Levenstien
Email from: donna@nlgrealty.com
Address: 41 5th Ave Apt 12c New York NY 10003
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of herbicides/pesticides in Lake George

From: brookefs@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [brookefs@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 8:33:14 PM

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Please copy "2022-0003, Brooke MacDonald, brookefs@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Brooke MacDonald
Email from: brookefs@gmail.com
Address: 8094 lake shore drive Silver bay, NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: Klmmam@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: Klmmam@hotmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 12:35:46 PM

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Please copy "2022-0003, Kathleen malinak, Klmmam@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Kathleen malinak
Email from: Klmmam@hotmail.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Do you drink, cook, or wash using the water of Lake George? Or eat the fish that is caught? My family has been homeowners since 1953 on the lake and solely depend on the water for all of this and more. What makes you think this herbicide will solve the problem without polluting the fresh water we depend on? Or not make people or aquatic life sick? Please do NOT experiment on this fresh water lake and tighten the regulations for building/housing/deforestation and visitors to help combat the invasive species.

From: fcanfixit@aol.com
To: [APA Regulatory Programs Comments](#)
Cc: fcanfixit@aol.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 10:20:32 AM

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Please copy "2022-0003, Frank Marceca, fcanfixit@aol.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Frank Marceca
Email from: fcanfixit@aol.com
Address: 899 New Hague rd Hague Ny 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Dear Leigh R Walrath

For the record I am against using any chemical substance in Lake George. Other less invasive measures against EWM may be the safer way to proceed until more studies have been completed on the use of Porcella COr in our Lake.

Thank you
Frank Marceca

From: marchetti_us@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: marchetti_us@yahoo.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 8:54:12 AM

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Please copy "2022-0003, Michael Marchetti, marchetti_us@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Michael Marchetti
Email from: marchetti_us@yahoo.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

From: tommarchetti@mindspring.com
To: [APA Regulatory Programs Comments](#)
Cc: tommarchetti@mindspring.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 10:34:33 AM

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Please copy "2022-0003, Thomas Marchetti, tommarchetti@mindspring.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Thomas Marchetti
Email from: tommarchetti@mindspring.com
Address: 142 S Pintail Dr OH 44023
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I have a home in Silver Bay, on the lake. We drink the water from the lake with very little treatment. I do not support the use of any pesticides/herbicides in Lake George. None of the potential candidate have an efficacy history, and Lake George's waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
 - 2) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
 - 3) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
 - 4) The APA should keep the Public Comment period open beyond March 31, 2022.
 - 5) I have followed the more mechanical attempts to control milfoil. They seem to be successful and I suggest we work further in that direction.
- Thank you for your time reviewing all Public Comments.

Thomas Marchetti
5 Bass Bay Road
Silver Bay, NY 12875

From: dshort474@aol.com
To: [APA Regulatory Programs Comments](#)
Cc: [dshort474@aol.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Thursday, March 31, 2022 5:49:50 PM

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Please copy "2022-0003, donna Short, dshort474@aol.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: donna Short
Email from: dshort474@aol.com
Address: 474 Butler Drive Lake Forest IL 60045
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

No. Do not like the idea of herbicide i the lake so near ro water we swim and drink
We are in Kitchel Bay

From: wsoliday@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [wsoliday@gmail.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 7:44:19 PM

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Please copy "2022-0003, soliday wendy, wsoliday@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: soliday wendy
Email from: wsoliday@gmail.com
Address: 8094 Lake Shore Drive Silverbay NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I am very much opposed to using this herbicide in lake George. This lake is one of the few fresh water lakes that is still used for drinking water. The possible unknown benefits do not warrant the use of this questionable unstudied and damaging action. Please do not allow.

From: haguejudy@nycap.rr.com
To: [APA Regulatory Programs Comments](#)
Cc: haguejudy@nycap.rr.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 3:26:27 PM

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Please copy "2022-0003, Judith Stock, haguejudy@nycap.rr.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Judith Stock
Email from: haguejudy@nycap.rr.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

It is imperative to keep the Public Comment period open beyond March 31, 2022. As it is currently part of the "off season," many lakeside landowners have not had adequate time to research these issues. As someone who has lived through the many discussions on milfoil, I feel that much more attention must be given to this proposal.

Kathy Bozony, who has been an unwavering supporter for water quality in Lake George has presented her views which certainly deserve more widespread discussion. Specifically she has stated she does not support the proposal and has listed items to be addressed, namely:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.

Please keep the Public Comment option open so many more Adirondack Park residents may be better informed and voice their opinions.

Judith Stock
Publisher, The Hague Chronicle
Hague, New York

From: Hague3@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: [Hague3@yahoo.com](#)
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 7:27:46 AM

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Please copy "2022-0003, Michael Strutz , Hague3@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Michael Strutz
Email from: Hague3@yahoo.com
Address: 9222 Lakeshore Dr Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

This is very straightforward. Don't add herbicides to drinking water!!!! I draw my water from the lake and do not want to drink herbicides. I don't care how much you say it's been diluted. I don't want it in my drinking water. Hand harvesting makes more sense to me especially in Lake George.

And extend the time for public comment. The word is just getting around and more time is needed so everyone can have their voice heard.

From: taylorbobbilynn@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: taylorbobbilynn@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Monday, March 28, 2022 3:08:20 PM

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Please copy "2022-0003, Bobbi & David Taylor, taylorbobbilynn@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Bobbi & David Taylor
Email from: taylorbobbilynn@gmail.com
Address: 63 Pine Cove Road Hague NY 12836
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Dear Sirs:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as "Other Ingredients," therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those proprietary chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there are 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in "slow-moving/quiescent waters (tranquil, inactive water). As Lake George flows into Lake Champlain, it would appear that Lake George is not suited for the use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and "...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done? What was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) As this issue has only recently been made known to the public, the APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

Sincerely,
Bobbi & David Taylor

From: Lkgeorge@verizon.net
To: [APA Regulatory Programs Comments](#)
Cc: Lkgeorge@verizon.net
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 8:17:17 AM

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Please copy "2022-0003, Judy Taylor, Lkgeorge@verizon.net" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Judy Taylor
Email from: Lkgeorge@verizon.net
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

As much as I would like to see the eradication of Milfoil in the lake I am strongly opposed to the use of ProcettaCOR EC or any other unproven, untested chemical in our lake. Lake George should not be used as a pilot project for ANY untested chemicals. We swim in and drink the water of Lake George. This just doesn't make sense!

From: marybethwagner@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: marybethwagner@hotmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 9:14:46 AM

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Please copy "2022-0003, Mary-Beth Wagner, marybethwagner@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Mary-Beth Wagner
Email from: marybethwagner@hotmail.com
Address: 31 Webster Avenue 12801
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

Eurasian millefoil is a real concern, but I'd like you to give further consideration to the type of chemical control you are proposing to use.

From: bob.silverbay@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: bob.silverbay@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Wednesday, March 30, 2022 2:25:34 PM

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Please copy "2022-0003, Robert and Janet Whitaker, bob.silverbay@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Robert and Janet Whitaker
Email from: bob.silverbay@gmail.com
Address: 4 Spruce Mountain Lane, PO Box 2597 Silver Bay NY 12874
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

We are very concerned about proposal to use the herbicide ProcellaCOR EC in areas of Lake George almost directly across the lake from our home. We subscribe to the comments from Kathy Bozony and the position of the Lake George Association that it is premature to authorize such usage. Although we understand the success of the herbicide in other lakes, it does not appear to us as laymen that the period of usage has been long enough to be confident that it will not have some negative impacts over longer periods of time. We understand that the LGPC also has the long term interest of the lake as a goal but we would argue for more unanimous analysis of the risks of the use of the herbicide in the pristine waters of Lake George.

From: Kamton2@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: Kamton2@yahoo.com
Subject: APA Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 4:16:38 PM

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Please copy "2022-0004, Kelly Baker, Kamton2@yahoo.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Kelly Baker
Email from: Kamton2@yahoo.com
Address: 837 New Vermont Rd BOLTON LANDING NY 12814
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

I agree with Mr. Navitsky. Wait to see more data from lakes of similar size, as I feel this could back-fire and make the situation worse. Keep harvesting until we know we are going to be able use the herbicide with full confidence.

From: alw@ecm.com
To: alw@ecm.com
Cc: alw@ecm.com
Subject: 013 Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 7:57:47 AM

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Please copy "2022-0004_P_Sawyer_alw@ecm.com" into your message for our reference.

Attn: Leigh R. Walsh
Comments from: P Sawyer
Email from: alw@ecm.com
Address: Easton NY
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

97% of the herbicide is listed as "Other Ingredients", therefore, we don't know the chemicals used in most of the product (are the possible negative impacts of these "proprietary" chemicals used as a surfactant). Evidence from scientific studies with lab animals suggests that Floupyrusifon-benzyl, the "active" ingredient of ProcelacORE EC, may cause cancer, disrupt hormonal systems, and cause liver and kidney damage.
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch001>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch002>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch003>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch004>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch005>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch006>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch007>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch008>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch009>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch010>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch011>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch012>
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<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch014>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch015>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch016>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch017>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch018>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch019>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch020>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch021>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch022>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch023>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch024>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch025>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch026>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch027>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch028>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch029>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch030>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch031>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch032>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch033>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch034>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch035>
<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch036>
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<https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch151>
[https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-00](https://pubs.nsl.gov/doi/pdf/10.1021/bk-1993-0001.ch152)

From: lcarbognin@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: lcarbognin@gmail.com
Subject: APA Project 2022-0004 Public Comments
Date: Tuesday, March 29, 2022 9:36:04 AM

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0004, Lorraine Carbognin , lcarbognin@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Lorraine Carbognin
Email from: lcarbognin@gmail.com
Address: 197 Assembly Point Rd Lake George NY 12845
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

I echo the comments below which have been shared with me, and BEG you not to add chemicals to my drinking water - certainly while any question remains as to efficacy and adverse reaction to people, wildlife and habitats. Our water quality is struggling. DO NOT TAKE ANY STEP THAT IS NOT CERTAIN AND HAS NO RECOURSE.

Thank you for your attention.
Lorraine Carbognin

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

From: vzbc197@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [vzbc197@gmail.com](#)
Subject: APA Project 2022-0004 Public Comments
Date: Tuesday, March 29, 2022 9:39:48 AM

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Please copy "2022-0004, Robert Carbognin, vzbc197@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Robert Carbognin
Email from: vzbc197@gmail.com
Address: 197 Assembly Point Rd Lake George NY 12845
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product).
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for use of this herbicide.
- 5) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and " ...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling EWM.
- 6) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments

From: steamsrising@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: steamsrising@gmail.com
Subject: APA Project 2022-0004 Public Comments
Date: Tuesday, March 15, 2022 11:05:33 AM

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Please copy "2022-0004, Peter Carney, steamsrising@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Peter Carney
Email from: steamsrising@gmail.com
Address: PO Box 592, Lakeshore Dr. Hague NY 12836
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

I would like to see a copy of the actual application. Can you please send me an electronic copy?

From: lorraineruffing@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: lorraineruffing@hotmail.com
Subject: APA Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 6:54:02 AM

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Please copy "2022-0004, lorraine ruffing, lorraineruffing@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: lorraine ruffing
Email from: lorraineruffing@hotmail.com
Address: 66 bayparkway lake george ny 12845
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

According to the EPA there are a number of issues with the use of ProcellaCor.
1. use of the product may cause milfoil to become resistant to its further application. 2. ProcellaCor is for use in slow-moving waters with no outlet. This is not the case for Lake George with its sometimes violent wave action. It also empties into Lake Champlain and so does have an outlet. 3. 97.3% of the ingredients are not listed; how then can we know their impact? 4. the EPA said there is practically no risk for wildlife? what does practically mean? DDT in the 1950s eliminated the trout population. Are we willing to try a product where we don't know the ingredients? 5. Lastly, what will be the impact on native plants?

Please deny the use of ProcellaCor in drinking water until more is known. It should be emphasized that most residents take water directly from the lake with no town filtering process.

From: kernof@gmail.com
To: [All Stakeholder Comments Comments](#)
Cc: [Public Comments](#)
Subject: 2022-0004_Katherine S. Ross, kernof@gmail.com - new your message for our release.
Date: Wednesday, March 30, 2022 8:47:55 AM

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Please copy 2022-0004_Katherine S. Ross, kernof@gmail.com into your message for our release.

Attn: Leigh R. Walsh
Comments from: Katherine S. Ross
Email from: kernof@gmail.com
Address: 16 Empire Ave Glens Falls NY 12041
Re: Agency Project 2022-0004_Lake George Park Commission

My Comments:

1. I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:
 - 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
 - 2) For Sapro (the herbicide company), the product use may result in herbicide resistance. (It is noted that after two applications you should use another Sapro 'integrated pest management strategy' product).
 - 3) Evidence from scientific studies with lab animals suggest that Flupyradifurone-based, the 'active' ingredient of ProcellaCOR EC, may cause cancer, disrupt hormonal systems, and cause liver and kidney damage. https://pub2.aeflinka.protection.outlook.com/?url=https://www.beyondpesticides.org/sites/default/files/2022-03-29/pesticide-gateway%20pesticide%20and%20water%20quality%20report%20-%202021-2022-0004_Katherine%20S.%20Ross%20-%20new%20your%20message%20for%20our%20release.pdf
 - 4) Many residents and visitors along and near Lake George get their drinking, cooking, and bathing water from the Lake. We should never put potentially hazardous chemicals into our drinking water.
 - 5) EPA concluded that there are 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
 - 6) ProcellaCOR EC is stated for use in 'slow moving/quietest waters (trough, inactive water)'. Lake George and its documented currents while flowing into Lake Champlain would not appear indicative for the use of this herbicide.
 - 7) The APA conducted monitoring on Minerva Lake throughout 2021 after the 2020 ProcellaCOR EC application and "...found no significant impact on other plants, or degradation in wetlands...". How was the APA evaluation of the 2020 application in Minerva Lake done, and what was actually identified in that monitoring? Native aquatic vegetation is important to Lake George and should not be compromised when controlling Eurasian Water Milfoil.
 - 8) The APA should keep the Public Comment period open beyond March 31, 2022.

Thank you for your time reviewing all Public Comments.

YOUR NAME

From: Klmmam@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [Klmmam@hotmail.com](#)
Subject: APA Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 12:43:33 PM

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Please copy "2022-0004, Kathleen Malinak, Klmmam@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Kathleen Malinak
Email from: Klmmam@hotmail.com
Address:
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

As my family has been living and depending on the lake waters for drinking, cooking, bathing, fishing SINCE 1953, I ask you to reconsider the application of this aquatic herbicide that is another poison with the affects on aquatic life not truly known. Another DDT experiment? Only to find out too late the affect on all life, from birds and bees, to people, wildlife, etc?
PLEASE RECONSIDER.

From: martignettimichael@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: martignettimichael@gmail.com
Subject: APA Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 10:17:39 AM

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Please copy "2022-0004, Michael Martignetti, martignettimichael@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Michael Martignetti
Email from: martignettimichael@gmail.com
Address: 33 Fish Point Rd Bolton Landing NY 12814
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

With so much opposition to the Lake George Park Commission/ADA's application to introduce a controversial chemical to our precious lake, I can't imagine that this application will be approved. First of all, there is no rush to totally eliminate the Eurasian Milfoil, the ongoing method of hand-harvesting (although time consuming and costly) has been going very well for many years. Secondly when there is so much controversy over the use of this chemical by reputable, knowledgeable individuals and the Lake George Association (LGA), it would be wrong to disregard the concern of so many who object. I suggest that you "Indefinitely Postpone" this matter until all parties have had the time to more thoroughly investigate the potential consequences of using this chemical in our lake (how does this chemical effect humans & animal when digested)? This chemical is banned by some European countries, that fact alone should warrant a delay in any decision until more is known. Sincerely, Michael Martignetti - Fish Point, Bolton Landing, NY 12814

From: Jhtaylor42@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: Jhtaylor42@gmail.com
Subject: APA Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 6:25:15 AM

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Please copy "2022-0004, John Taylor, Jhtaylor42@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: John Taylor
Email from: Jhtaylor42@gmail.com
Address: 154 Lake Pkwy Lake George NY 12845
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

I feel that the long term effects of fluoride poisoning, are inadequately understood, and a decision to put it in our drinking water is extremely unwise.

Sincerely,

John Taylor

154 Lake Parkway

Lake George, NY 12845

From: alsupra@nycap.rr.com
To: [APA Regulatory Programs Comments](#)
Cc: alsupra@nycap.rr.com
Subject: APA Project 2022-0004 Public Comments
Date: Wednesday, March 30, 2022 5:07:53 PM

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The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0004, ALLAN RIDER, alsupra@nycap.rr.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: ALLAN RIDER
Email from: alsupra@nycap.rr.com
Address: 85 Pine Orchard Rd NY 12836
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

I do not support the use of pesticides/herbicides in Lake George. ProcellaCOR EC does not have an efficacy history, and Lake George's Class AA-Special waters should not be a pilot project/experiment. Applying chemicals to Lake George may have implications far beyond our need to control Eurasian watermilfoil (EWM). In addition, the following needs to be addressed:

- 1) 97.3% of the herbicide is listed as 'Other Ingredients', therefore we don't know the chemicals used in most of the product (nor the possible negative impacts of those 'proprietary' chemicals used as a surfactant).
- 2) Per Sepro, the product use may result in herbicide resistance (which is noted that after two applications you should use another Sepro 'integrated pest management strategy' product). What product is next in line and what are it's ingredients?
- 3) EPA concluded that there is 'No Risk Concerns' for non-target wildlife, and practically 'Non-Toxic' to bees, birds, reptiles, amphibians, and mammals. What does this mean?
- 4) ProcellaCOR EC is stated for use in 'slow moving/quiescent waters (tranquil, inactive water). As clearly and scientifically documented by the Jefferson project, Lake George and it currents is hardly a candidate for use of this herbicide.

I do not understand the approval of an untested herbicide with 97.3% proprietary and thus unknown ingredients and then make the claim that is it safe! Based on what? Would you drink water that has been treated with this Herbicide.....Lake George is drinking water for many!

The public comment period needs to be extended and the Lake George Park Commission should hold a public meeting to discuss this in an open forum.

From: wslevett@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: wslevett@gmail.com
Subject: APA Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 10:30:48 PM

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***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0004, William S Levett, wslevett@gmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: William S Levett
Email from: wslevett@gmail.com
Address: 27 SUNSET LN NY 12845
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

I am a year round resident on Lake George and I understand the need to control the milfoil; however, putting poison in the water our children swim in, the water we pump into our homes, and have worked so hard to protect is absurd and irresponsible. More voices need to be involved in this discussion and not during the "off season" when many concerned residence are not here to defend our lake!

I beg you to not move forward with this plan. At the very least, delay this decision until further conversations can take place.

Please do the right thing for the lake and the people who call it home.

Thank you,

Bill Levett

From: BJpozzi@hotmail.com
To: [APA Regulatory Programs Comments](#)
Cc: [BJpozzi@hotmail.com](#)
Subject: APA Project 2022-0004 Public Comments
Date: Thursday, March 31, 2022 9:51:53 AM

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***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0004, Beverly Pozzi, BJpozzi@hotmail.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Beverly Pozzi
Email from: BJpozzi@hotmail.com
Address: 66 Bay Pkwy Lake George NY 12845
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

Dear Mr. Walrath,
As a family homeowner since 1953 I am shocked that the APA and LGPC are seeking approval to apply a chemical aquatic herbicide ProcellaCOR E to DRINKING WATER.

This is another attack on the health of those who rely on Lake George as their source of water. Many homeowners do not have land where wells can be driven.

Better scientific minds are needed for the APA agency, it's time for a change.
Respectfully submitted,
Beverly Pozzi

From: pusateri14@aol.com
To: [APA Regulatory Programs Comments](#)
Cc: [pusateri14@aol.com](#)
Subject: APA Project 2022-0004 Public Comments
Date: Tuesday, March 29, 2022 3:56:00 PM

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***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPCComments@apa.ny.gov.
Please copy "2022-0004, Frank & Rosemary Pusateri, pusateri14@aol.com" into your message for our reference.

Attn: Leigh R. Walrath
Comments from: Frank & Rosemary Pusateri
Email from: pusateri14@aol.com
Address: PO Box 274 75 Mason Rd 12820
Re: Agency Project 2022-0004, Lake George Park Commission

My Comments:

We are year round lakeshore residents. We drink Lake George water and swim in Lake George.
We oppose this application as premature, risking the fragile ecology of already-stressed Lake George and risking public health. Further testing, study and analysis of this herbicide (along with all its non-disclosed adjuvants and its proprietary secret additives, as well as all compounds produced as the herbicide degrades) should be conducted regarding toxicity and sub-lethal and long-term potential harm for humans and for all of the native or non-invasive animals and plants in Lake George.
If and only if all testing, study and analysis proves negative for risk of lethal, non-lethal and long term harm to humans and all non-invasive plants and animals, should use of this herbicide ProcellaCOR be considered for usage in Lake George to control one nuisance invasive species.
Thank you for the opportunity to comment.

From: Kevin
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 6:09:09 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Walrath,

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Kevin Kelly
10 Serenity Ln
Lake George, NY 12845

From: cec
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 1:46:43 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Please note that as a year round resident of Lake George I drink the lake water daily along with my family members and guests. Adding chemicals to the lake water is a risk to our health and to the health of all who drink the lake water.

Sincerely,

Cec Trager

PO Box 110 (2043 Camp Andrews Way)
Kattskill Bay, NY 12844

From: Patrick Cartwright
To: [APA Regulatory Programs Comments](#)
Subject: APA Projects 2022-0003and -0004
Date: Thursday, March 31, 2022 6:41:05 AM

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Leigh R. Walrath

Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 <tel:2022-0003> and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

In summary, our primary concerns include:

- * possible negative impacts to human health, which have led the European Food Safety Authority to withhold approval of the herbicide's use;
- * lack of adequate, peer-reviewed scientific data regarding potentially adverse impacts to native plants and organisms that are specific to Lake George;
- * concern that intense, rapid and concentrated nutrient loading from herbicide-treated and decomposing milfoil will cause significant algal growth and increase the risk of harmful algal blooms;
- * the likely spread of the herbicide miles from the proposed testing sites due to the Lake's strong currents;
- * concerns about how long the toxic chemical will remain in the Lake, and the fact that it eventually breaks down into chemicals that are just as toxic as the parent;
- * the likelihood that the herbicide's projected effectiveness will be reduced by the Lake's strong currents since the manufacturer clearly states its product performs best in "slow moving/quiescent waters with little or no continuous outflow ..."

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Patrick Cartwright

83 Friends Point Road

Box 676

Hague NY 12836

From: anthonydingman@gmail.com
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Chemical herbicides to destroy milfoil
Date: Friday, April 1, 2022 3:29:01 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Friends and families,

Unfortunately, this is another example of the cure being worse than the disease. Lacking any information about the effects of the herbicide being touted by the APA on the human body, nor even on the quality of the fishing, I strongly urge that the proposed herbicide be tabled until further evaluation can be achieved and the results circulated among all interested persons.

My first visit to Huletts was in 1938 and my parents purchased our home there in 1942 after a summer's stay, having rented it "sight unseen." It is now a vacation home for its fourth generation of Dingmans. I would hate to see the water quality diminished because of some misguided effort to kill milfoil.

Sincerely,

/s/

Anthony H. Dingman

5123 Bluff Head Road

Huletts Landing, New York

P. O. Box 45

From: Rick Elkin
To: [APA Regulatory Programs Comments](#)
Subject: Chemicals have Consequence
Date: Thursday, March 31, 2022 8:58:47 AM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Richard J. Elkin, DO

Invest in keeping Lake George clear and clean.

From: Daniel MARGOLIS
To: [APA Regulatory Programs Comments](#)
Subject: Chemicals in Lake George
Date: Wednesday, March 30, 2022 11:19:43 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Please deny the application for the use of chemicals in Lake George to eradicate mil foil They have not been tested enough in Lake George environment and could have a great risk to the water and the residence of Lake George

Sincerely

Dan Margolis
134 Lake Parkway
Lake George New York

Sent from my iPhone

From: Patrice Martin
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM
Date: Thursday, March 31, 2022 2:13:19 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. I know many of my neighbors get their water from the lake. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Patrice Martin

4063 ALBERT WAY, HULETT'S LANDING, NY 12841

From: Steven Broderick
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Eurasian watermilfoil, chemical treatment in Lake George
Date: Thursday, March 31, 2022 12:44:05 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely, Steven and Carol Broderick, LGA Member

Mountain View Way, Pilot Knob/ Kattskill Bay, NY (Summer)

303 Laketree Drive, Staunton, VA 24401

From: DAVID RICHARDS
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Fwd: Failure Notice
Date: Thursday, March 31, 2022 12:12:35 AM

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Begin forwarded message:

From: DAVID RICHARDS <richardsdave7@aol.com <<mailto:richardsdave7@aol.com>>>

Subject: Public Response not to use Chemical Herbicide - "ProcellaCOR" in Lake George

Date: March 30, 2022 at 11:55:38 PM EDT

To: RPcomments@apa.ny.gov <<mailto:rpcomments@apa.ny.gov>>

Cc: Lucinda Bhavsar <info@lakegeorgeassociation.org <<mailto:info@lakegeorgeassociation.org>>>

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

David Richards

6318 Sunset Bay Rd.

PO Box 173

Huletts Landing, NY 12841

From: mmtm@usa.com
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Herbicide LG
Date: Thursday, March 31, 2022 12:58:49 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Dr M Martinez

11 Sign Post Rd.
Dunhams Bay, Lake George

From: Richard Okeeffe
To: [APA Regulatory Programs Comments](#)
Subject: herbicide ProcellaCOR
Date: Thursday, March 31, 2022 1:53:11 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Please deny the Lake George Commission's application to use the herbicide ProcellaCOR until further testings as to possible adverse effects have been completed.

DICK OKEEFFE
10 HOLIDAY POINT
CLEVERDALE NY

From: David Gripenburg
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociatio.org
Subject: Herbicide
Date: Thursday, March 31, 2022 9:16:46 AM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

NAME: David Gripenburg

ADDRESS: 1860 Pilot Knob Road, Kattskill Bay, NY 12845

From: Florence Connor
To: [APA Regulatory Programs Comments](#)
Subject: Lake George Herbicide
Date: Wednesday, March 30, 2022 11:15:35 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

This is ridiculous to think you can put a chemical into a body of water and not create a problem. Especially when the body of water flows.

Consider what happens when you put a few drops of milk in a glass of water!
It immediately mixes with the water and there is NO WAY you are going to separate the two. Though it may be only milk and water, — you do not want to drink it because it is now not “clean” water.

How can you make water “clean” once you put that drop of herbicide in it. You can’t! Therefore, don’t do it.

Florence E. Connor. 941-485-6439
6 Holly Lane
Lake George, NY 12845

From: Marc Coleman
To: [APA Regulatory Programs Comments](#)
Subject: Lake George Lake
Date: Thursday, March 31, 2022 1:02:26 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 <tel:2022-0003> and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Marc Coleman

11 Sign Post Rd.

Dunhams Bay, Lake George

Sent from my iPhone

From: E C Ryder
To: [APA Regulatory Programs Comments](#)
Subject: Lake George Park Commission Herbicide use in Lake George
Date: Thursday, March 31, 2022 12:39:07 AM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Walrath:

My father, John K. Ryder, was appointed as a Commissioner of the APA by then Governor Mario Cuomo in 1990, and later was approached by Governor George Pataki to become the Commissioner of the APA. It was because of my fathers and many others, insurmountable love of Lake George, their commitment, and ingenuity used to unequivocally protect one of the most beautiful and pristine lakes in the world. My father founded The Fund for Lake George and the Lake George Land Conservancy to insure this exact type of action would never be allowed in Lake George. The current leadership of the LGPC obviously does not care, or understand what our scientists and conservationists are doing to protect and keep natural the waters of Lake George.

The LGPC must listen to the experts and scientists intimately involved in protecting the waters of Lake George. The Eurasian watermilfoil is a result of human pollution. That is the problem which must be dealt with quickly and severely by the APA specifically homeowners whose septic systems are leaching into the lake.

I most certainly request the APA deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

Sincerely,
Lisa Ryder
LTC USA RET
9406 Dons Court
Huntsville AL 35803

Sent from my iPad

From: Eric
To: [APA Regulatory Programs Comments](#)
Subject: Lake George ProcellaCOR treatment
Date: Thursday, March 10, 2022 6:08:42 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Sir/Ma'am,

As President of the Protective Association for Lake Sunnyside (PALS) in Queensbury NY, I am writing you in support of Lake George's initiative to use the herbicide ProcellaCOR this year to eradicate populations of Eurasian watermilfoil in Lake George. As it turns out, the population of milfoil in Lake Sunnyside has reached the point whereby the property owners have agreed to also have a ProcellaCOR treatment in our lake this year. Lake Sunnyside is a kettle lake of only about 39 acres and it sits just outside of the Adirondack State Park.

We believe the sharing of results from our treatments will help all lake associations and property owners make more informed decisions on how to optimize our invasive species management strategies going forward.

Feel free to contact me if you have thoughts you wish to share or have questions for me to answer. Thank you for your consideration.

Sincerely,

Eric Sage

President, PALS

Cell: 518-250-9111

From: mahollander@aol.com
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Lake George Water/milfoil
Date: Thursday, March 31, 2022 3:53:52 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Mary Ann Hollander

4224 Beach Way

Huletts Landing, NY 12841

Sent from my iPhone

From: Mark Bernstein
To: [APA Regulatory Programs Comments](#)
Subject: Lake George
Date: Wednesday, March 30, 2022 8:30:52 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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Sincerely,

Mark

From: Nancy Howland
To: [APA Regulatory Programs Comments](#)
Subject: Lake George
Date: Wednesday, March 30, 2022 8:17:40 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

To Whom it May Concern at APA;

I am 5 th generation waterfront property owner on Lake George. As a tax paying citizen with a keen interest in preserving the water quality at Lake George for my 9 grandchildren I implore you to NOT USE CHEMICAL herbicides, pesticides in or around Lake George to control any invasive species. Rather, follow guidelines of the science, LGA and Waterkeeper moving forward.

Thank you for your time and attention to this matter.

Nancy Howland
PO Box 16
1281 Pilot Knob Rd
Kattskill Bay, NY 12844
518-307-9709

Sent from my iPhone

From: Chris Aiken
To: [APA Regulatory Programs Comments](#)
Subject: LG ProcellaCOR pilots
Date: Saturday, March 12, 2022 2:10:14 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

This next-gen tool to battle Eurasianmilfoil appears to be an effective tool and I support the issuance of a permit for its use/testing in Lake George.

Regards,

Chris Aiken

Town of Chester board member.

Sent from my iPhone

From: Jeffrey Greenhouse
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Date: Wednesday, March 30, 2022 8:53:34 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Jeffrey Greenhouse

364 Cleverdale Rd
Queensbury NY

Sent from my iPhone

From: karen moskal
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: No chemical herbicide ProcellaCOR in our lake
Date: Wednesday, March 30, 2022 10:01:47 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Louis and Karen Moskal

445 Glenburnie Rd

Putnam Station, NY 12861

From: Donald Culbertson
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org; [Heidi Culbertson](#)
Subject: No chemicals in our lake.
Date: Thursday, March 31, 2022 7:40:09 AM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Don & Heidi Culbertson

699 Gull Bay Rd.

Putname Station, NY 12861

From: Chan / Knight
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: No herbicide in Lake George
Date: Thursday, March 31, 2022 8:58:54 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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Sincerely,

William Knight

From: SALLY J SHELDON
To: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Subject: No Herbicides in Lake George Please!!
Date: Thursday, March 31, 2022 2:55:30 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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Sincerely,

Sally Sheldon
6 Quevic Drive
Saratoga Springs, NY 12866

From: John Ryan Mcdonald
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: No Herbicides in Lake George
Date: Wednesday, March 30, 2022 10:08:05 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

My name is John McDonald and I am a Junior at the University of Gergia. I have been vacationing to Hulett's Landing my whole life and would be deeply saddened by the use of herbicides in the lake. It is a beautiful place. There is simply nothing like it anywhere else in our world and it would be a shame to have a substance added to the lake with the lack of knowing what it may cause to the water and the life within.

Sincerely,

John McDonald

5273 Bluff Head Road

Hulett's Landing, NY

12841

From: Natalie Laurie
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: No Herbicides Please
Date: Wednesday, March 30, 2022 7:31:30 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Project 2020-0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Natalie Laurie

401 Brook Rd. Chelsea, VT 05038

From: Susie Moon (Sanderspree)
To: [APA Regulatory Programs Comments](#)
Subject: No ProcellaCOR In Lake George
Date: Wednesday, March 30, 2022 7:16:30 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Project 2020-0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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Sincerely,

Suzanne Moon

Lifelong Lake George Resident

From: Mike O'Brien
To: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Subject: No procellaCOR
Date: Thursday, March 31, 2022 9:02:21 AM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTMto treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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Sincerely,

NAME

ADDRESS

Michael O'BRIEN
917-859-6079
18th Ward Brewery
Northern Bell
Jimbo Slims

From: Cydney Smith
To: [APA Regulatory Programs Comments](#)
Subject: NO ProcellaCORTMto in Lake George
Date: Wednesday, March 30, 2022 9:29:23 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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Sincerely,

Cydney Smith

Huletts Landing

From: Joanne
To: [APA Regulatory Programs Comments](#)
Subject: NO to the use of ProcellaCOR in The Queen of American Lakes
Date: Thursday, March 31, 2022 3:48:52 AM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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Sincerely,

Joanne M. Gavin
24 Halada Drive
Lake George, NY 12845

From: R Garfield
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Opinion on the Application for the Use of ProcellaCOR
Date: Thursday, March 31, 2022 5:46:25 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Hello Mr. Walrath:

It recently came to my attention that the Adirondack Park Agency has received an application for the use of the chemical herbicide ProcellaCORTM from the Lake George Park Commission to treat Eurasian watermilfoil on Lake George.

I'm writing to ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM .

I have enjoyed the quality and cleanliness of Lake George since the 1960's when I first arrived as a boy. In considering all of the Adirondack Park's marvelous natural wonders, the idea that Lake George could be spoiled permanently and irreparably is a notion that is alarming and saddening at the same time.

My doctorate includes the study and application of chemicals to treat and diagnose eye disease. My knowledge of chemical interactions is not scant and I understand the variable nature of chemical action in a closed system. Lake George is one such closed system. The primary reason that Lake George has remained pristine, as well as remaining a destination for billions of visitors through the ages, is its isolated nature. There is no easy way to wash out the deleterious actions of a chemical, especially one that is poorly understood and irreverently applied, in a system that cannot be evacuated readily. The results could be catastrophic and could render the jewel of the Adirondacks a dead pool of biological waste.

I do not doubt that the Lake George Park Commission and the Adirondack Park Agency both have the best interests of Lake George at heart. Patience and understanding are both now necessary to draw the ideal conclusion about the unknown effects of ProcellaCORTM on such a lovely and valuable environment. The use of this herbicide should be denied for the time being.

Please keep this issue in control until the environmental impact of this chemical is fully understood. Thank you for your attention and the efforts you make for the benefit of everyone.

Sincerely,

Dr. Robert Garfield

Adamstown Eye Care, LLC

2654 N Reading Rd

Reinholds, PA 17569-9640

From: Meghan Ashe
To: info@lakegeorgeassociation.org; [APA Regulatory Programs Comments](#)
Subject: Pesticide in lake comment
Date: Thursday, March 31, 2022 4:39:08 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 <tel:2022-0003> and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Meghan and Brian Ashe

From: Candice White
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: please deny LGPC application for ProcellaCor
Date: Wednesday, March 30, 2022 7:40:34 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Project 2020-0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

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Sincerely,

Candice White (summer resident for 50 years, Lake George business owner, Lake George Club member, concerned citizen)

5 Wild Turkey Lane
Lake George, NY 12845

From: Chris McKenna
To: [APA Regulatory Programs Comments](#)
Subject: Please don't treat lake George with herbicide!
Date: Thursday, March 31, 2022 2:52:44 AM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcettaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcettaCOR in The Queen of American Lakes.

Sincerely,

Chris & McKenna

Sent from my iPhone

From: Margie Amodeo
To: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Subject: ProcellaCOR in Lake George
Date: Thursday, March 31, 2022 8:57:49 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

In 1951 my grandfather built a camp on Lake George. Since then the Lake has been a member of our family.

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

In January, I welcomed a granddaughter into our family. This summer she will swim in Lake George for the first time. Please allow her the opportunity to swim safely in the Lake as our family has for five generations.

Sincerely,

Margie Amodeo

1382 Rosehill Blvd.

Niskayuna, NY 12309

From: John Borek
To: [APA Regulatory Programs Comments](#)
Subject: ProcellaCOR permit
Date: Thursday, March 31, 2022 8:58:21 AM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Sample Letter

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 <tel:2022-0003> and -0004

Dear Mr. Walrath:

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Sincerely,

NAME John & Mara Borek

ADDRESS 598 Goggins road Lake George 12845

Sent from my iPad

From: cranknsweet@comcast.net
To: [APA Regulatory Programs Comments](#)
Subject: ProcellaCOR tm
Date: Thursday, March 31, 2022 12:19:38 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Please note: I have copied the text above in my letter to you because I agree strongly with all it states and declares.

Sincerely,

NAME Karen and Chris Robinson

ADDRESS 732 Gull Bay Road, Putnam Station, NY 12861

From: John Rourke
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: ProcellaCOR
Date: Thursday, March 31, 2022 2:56:35 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

The EPA states that ProcellaCOR is “practically” non-toxic. Sure wish the word “practically” could have been eliminated in their description of the product. The lake has been, for generations, a source of very high quality drinking water for tens of thousands of families. Millions of island campers have filled containers at the end of docks with water to use for cooking and drinking. Once ProcellaCOR is injected there will always be doubt about water potability. Lake George is not a quiescent body of water. There is always movement even in and out of seemingly quiescent bays. The Jefferson Project will inform as to the dynamic nature of its currents at all levels and thermoclines of the water body. The predominant current running South to North continuously. Anyone who knows what Brownian movement means will forever doubt the safety of the waters of Lake George. Unfortunately, if ProcellaCOR is used, the “Queen of American Lakes” will be forever dethroned. It will be know as just another body of water in New York with chemicals in it. ProcellaCOR is just the beginning. If used, and resistance to it occurs, a different herbicide of unknown toxicity will need to take its place.

Sincerely,

NAME: John Rourke

ADDRESS: 98 Tiroga Beach Lane, Ticonderoga, NY 12883

From: Peter larkin
To: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Subject: ProcellaCOR
Date: Thursday, March 31, 2022 11:03:56 AM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Peter Larkin

6 Linden Place

Warwick NY 10990

From: Joachim Seitz
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: ProcellCOR Use in Lake George
Date: Thursday, March 31, 2022 1:07:55 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

The use of a chemical herbicide in Lake George is of particular concern to me as the Lake is the source of our drinking water.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Joachim Seitz

26 Burnt Ridge Road, Lake George, NY 12845

From: Bob Hill
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Proposed herbicide treatment in Lake George
Date: Thursday, March 31, 2022 11:49:00 AM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading because of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Robert W Hill

Clay Island

Bolton Landing, NY

From: ELIZABETH BRAINARD
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org; [JOHN MAIER](#)
Subject: Public Comment on APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:54:48 AM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. My understanding is that there are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals.

As the Park Commission itself attests, they and their partners have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. Until questions about herbicide use are resolved, I believe this is the proper approach for now, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Elizabeth A. Brainard

mailing: PO Box 1632
residence: 61 Hemlock Point Road
Bolton Landing, NY 12814

From: meredith@domeisland.com
To: [APA Regulatory Programs Comments](#)
Subject: RE: APA Project 2020-0004 BAD IDEA
Date: Wednesday, March 30, 2022 9:46:23 PM

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Eurasian millefoile is pernicious and difficult to eradicate, but that doesn't mean you should allow poison in drinking water.

Kathy Bozony says that the toxins disclosed on the label may be just the tip of the iceberg. In the 25 years I was blessed to live on the shore of Lake George, I never found fault with Bozony's information.

IF the proposed herbicide acted as promised, and instantly killed it—and only it—wouldn't decaying beds of poisoned milfoil fertilize algal blooms?

More likely, this toxin that is promised to be benign and effective in still water, will disperse in boat chop, in the wave action of Lake George's steep granite trough, and in her northward flow. Ineffective! So, since it is approved, just keep adding more poison? What could go wrong, with 97% of ingredients unknown?

Lake George is drinking water for a few camps now. What if the whole East Coast needs to drink it? You'd feel like a fool if you decided LG's value lay only in recreation and real estate.

Please treat Lake George as a vital resource, not simply a cash cow; or worse, a lab experiment.

Sincerely,
Meredith McComb
25 years The Anchorage
Bolton Landing

Currently resident of Northwestern Michigan, where this is also a problem.

From: John A. Lavender II
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Re: APA Project 2020-0004 (Say No to ProcellaCOR in Lake George)
Date: Wednesday, March 30, 2022 8:17:18 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Project 2020-0004

Dear Mr. Walrath:

We respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are too many unanswered questions from a scientific perspective to consider using this chemical in Lake George at this time.

We support the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. We respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. We believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

John A. Lavender II

Yvonne Lavender

19 Skyline Drive

PO Box 269

Bolton Landing, NY 12814-0269

phone: 518.796.9118

email: johnlavender2@gmail.com

From: Florence
Cc: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Subject: Re: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 7:56:42 PM

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Leigh R. Walrath

Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcettaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcettaCOR in The Queen of American Lakes.

Sincerely,

Patricia Trimboli

1007 county route 6

Huletts landing, ny 12841

Sent from my iPhone

From: Rachel Norton
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 4:42:06 PM

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Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Rachel Norton

Boulder, CO

From: Florence
Cc: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Subject: Re: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 7:58:33 PM

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Leigh R. Walrath

Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcettaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcettaCOR in The Queen of American Lakes.

Sincerely,

Florence Trimboli

1007 county route 6

Huletts landing, ny 12841

From: NYCAP
To: [APA Regulatory Programs Comments](#)
Subject: RE: APA Projects 2022-0003and 2022-0004
Date: Wednesday, March 30, 2022 9:19:40 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

We love or lake! Please do what's best to protect it for years to come!

Sincerely,

Mary and Greg Zibro

69 Damascus Dr

Gansevoort, NY 12831

From: Brooke Powers
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Say No to ProcellaCOR in Lake George
Date: Thursday, March 31, 2022 9:41:06 AM

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Dear Mr. Walrath,

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide RocellaCOR to treat Eurasian watermilfoil. Lake George is a national treasure and one that I cherish and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a specific perspective to consider using this chemical in our lake at this time. I am concerned about potential health impacts from this herbicide on the wildlife as well as human life around Lake George.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use. As you are aware these blooms make it unsafe for visitors and lake residents to enjoy the lake in the warmer weather, which would impact the tourist economy as well.

As the Park Commission itself proudly attests, they and their partners--with important financial assistance from New York State--have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the current proposed use of ProcellaCOR in The Queen of American Lakes.

Warmly,
Brooke Powers

From: Power, Emily
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Say No to ProcellaCOR in Lake George
Date: Wednesday, March 30, 2022 9:59:30 PM

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Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Emily Power

15 Commons Way

Hague, NY

12836

From: howard@hsmediamarketing.com
To: [APA Regulatory Programs Comments](#)
Subject: Support for Lake George Park Commission Request / ProcellaCOR
Date: Tuesday, March 15, 2022 3:55:00 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

To the Adirondack Park Agency,

Having closely followed the progress and challenges faced by the leadership of the Lake George Park Commission for many years, we are pleased to offer our support for the use of ProcellaCOR as part of the effort now underway to battle Eurasian Milfoil. Like our friends in Lake George, we of the Lake Luzerne Association are as constantly looking for new ways to keep our watershed healthy, while assuring that the efforts to do so are safe and in compliance with all applicable regulations. Through the many years of research, study and testing conducted on Lake George, we are confident that the leadership and talent overseeing the use of this product is more than capable and thoroughly professional.

We are hopeful the APA gives every consideration to Mr. Dave Wick to allow use of ProcellaCOR on Lake George.

Thanks for your attention.

Respectfully,

Howard Schaffer Vice-President

Lake Luzerne Association

From: susan kelly
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Use of chemical herbicide ProcellaCOR in Lake George, NY
Date: Thursday, March 31, 2022 3:04:44 PM

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Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: APA Projects 2022-0003 <tel:2022-0003> and -0004

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCORTM to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Susan M. Kelly

Sent from my iPad

From: Mary
To: [APA Regulatory Programs Comments](#)
Subject: Use of herbicide in Lake George
Date: Wednesday, March 30, 2022 10:30:27 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Our family has always been aware of the conservation efforts being proposed for the areas we love all over our country from the Everglades to Denali National Park. It is no wonder that our son has become the Lake George Waterkeeper. When I read about this proposed project, I called him immediately because the science has to be pretty conclusive before adding anything to our water. Too much of our water has been contaminated because of farm runoff by meat producers, mismanagement as seen in Flint, Michigan and the threat of mining here in Alaska and West Virginia. Please table this action until all the evidence is in and can be evaluated by the best scientists in the field. Our clean Water is too precious to be jeopardized.

Sincerely,

Mary E. Navitsky
Anchorage, Alaska

Sent from my iPad