



March 8, 2024

Mr. Aaron Siemann
Adirondack Park Agency
PO Box 99 Route 86
Ray Brook, NY 12977

Re: Response to Protect the Adirondacks RE: Public Comments on Application of the aquatic herbicide ProcellaCor EC in Brant Lake to control Eurasian Milfoil of February 15,2024.

Dear Aaron,

This letter is in response to the inaccuracies and omissions of the Protect the Adirondacks RE: Public Comments on Application of the aquatic herbicide ProcellaCor EC in Brant Lake to control Eurasian Milfoil of February 15,2024.

(Para2) Protect the Adirondacks states” that EWM was discovered in Brant Lake in the late 1980’s”. To be accurate, EWM was discovered in Brant Lake in 1985. Protect the Adirondacks states “The use of an herbicide known by the brand name of Sonar was considered but never used.” Protect the Adirondacks omits the year of consideration for Sonar Treatment was 1992, and the reason not used as Brant Lake EWM mapping efforts were not complete.

(Para 3) In Protect the Adirondacks paragraph on “EWM on Brant Lake”, Protect the Adirondacks has selectively used only one survey for density results of (Tom how many? I have 10) for ProcellaCor treatment.

(Para 4) In response to Protect the Adirondack’s statement “hand-harvesting has proven the most successful over the years” from the Suny Oneonta 2014-2015 Lake Study Report; Protect the Adirondacks omitted Aqualogic’s (Brant Lake’s EWM harvesting contractor) 2019 & 2022 written communication that hand harvesting efforts could not control the growth and spread of Eurasian Milfoil in Brant Lake.

From the 2014-2015 SUNY Oneonta Study, Protect the Adirondacks also omitted the Bathymetric Survey performed by SUNY Oneonta, showing that Brant Lake had between a 49-51% percent surface area to support Eurasian Milfoil Growth. (In comparison, Lake George and Schroon Lake are 12 and 13%).

Furthermore, Protect the Adirondacks ignores the economic impact of the above. The Town of Horicon major employers (Point of Pines Camp, Brant Lake Camp, Pilgram Camp, EZ Marine, and Brant Lake Marina) would have severe business impacts as growth of EWM to it’s Bathymetric potential would eliminate access to Brant Lake.

Further, Protect the Adirondacks also omitted NYSDEC December 2021 downgrade of Brant Lake to “Impaired waterway - low dissolved oxygen levels”.

Protect the Adirondacks erroneously states” The Applicant recognizes that hand harvesting of EWM will need to continue indefinitely, and that the hand harvesting has largely been successful”.
Protect the Adirondack’s response did not include the 2023 discovery of 5 additional large beds of EWM in Brant Lake.

The Town of Horicon and The Brant Lake Association have recognized the continued growth and spread of EWM cannot be controlled by hand harvesting alone, the economic and environmental impacts, (including a downward property re-evaluation, for which one has already occurred) would have disastrous effects on the Town of Horicon.

Protect the Adirondacks erroneously states (again, referring to the 2014-2015 Brant Lake Study) “Moreover, the Brant Lake Management Plan (2014-2015 (p.76) states that “hand harvesting appears to be the most (if not only) appropriate techniques for controlling EWM population at a desirable level for Brant Lake.”

Protect the Adirondacks erroneously states “The Brant Lake Stakeholders have not made a documented determination about a realistic goal, or desirable level of EWM suppression.” The Brant Lake, with the Town of Horicon, established a realistic goal of EWM control in 2019.

(Para 5) Protect the Adirondacks states “there is no information in the application material about the status and effectiveness of other strategies for controlling EWM identified in the Brant Lake Management Plan (2014-2015)) (page 71.)

From 2015, The Brant Lake Association, in coordination with the Town of Horicon, ESSLA, LCLGRP, WCSWCD, NYSFOLA and others, has heavily invested in education campaigns of proper maintenance of septic systems, all runoff mitigation strategies, and shoreline enhancements. These efforts include, but are not limited to, web, FB, Boat Launch signage and boater handouts, Free semiannual newsletters, beach association signage, and food truck Fridays at the Town of Horicon.

(Para 6, 7) Protect the Adirondacks selectively presents two lake experiences with ProcellaCor.

I would call on Protect the Adirondack’s to review both the Saratoga Lake experiences (Saratoga Lake has similar flow and tributaries to Brant Lake), and Lake Winnepesaukee experiences (3 surrounding towns draw their drinking water from).

(Para 8) Lake Luzerne has provided an updated letter of support for the application of ProcellaCor in Brant Lake, with results to date, to the APA.

(Para 9) (Bullet 1) The Brant Lake Association, as have many Lake Associations, has already offered to provide post survey results not only to the APA, but any other responsible organization.

(Bullet 2) EPA licensing of Procella Cor addresses these impacts.

(Bullet 3) ProcellaCor dilutions are addressed by EPA approval.

(Bullet 4) Please refer to Saratoga Lake regarding flow, tributaries, and dam outflow.

(Bullet 5) As noted in response to Para 5, The Brant Lake Association, with the Town of Horicon, has established a realistic goal for EWM Control. From the Bathymetric survey of the 2014-2015 Suny Oneota Lake Study, we fully recognize the risk of 49-51% lake surface are supporting EWM growth.

In closing, we cannot find any communication from Protect the Adirondacks after the 2019 Brant Lake with the Town of Horicon public announcement to investigate ProcellaCor for controlling EWM growth in Brant Lake, nor identified attendance at our open member and board meetings, nor identified at our public hearings in 2022 and 2023.

We only wish that Protect the Adirondacks had done so, to fully communicate the economic and environmental risks to the Town of Horicon and Brant Lake, and our due diligence in assessing.

Respectfully submitted,

Wayne Butler
Full time Horicon Resident
Past President, Brant Lake Association
Current Chairman, Lake Management