

From: [Daniel Kana](#)
To: [APA Regulatory Programs Comments](#); info@lakegeorgeassociation.org
Cc: [Daniel Kana](#)
Subject: In Favor of ProcellaCOR. !!!
Date: Thursday, April 7, 2022 10:55:09 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,

My name is Daniel Kana and I have been fortunate to spend most of my summers for the past 60 years at Sunset Bay in Huletts Landing.

I have been a member of the LGA for many years. I was extremely disappointed at the recent email sent out by the LGA on March 30th. So much

so that I actually thought it might Spam or an early April fools joke. Milfoil is not a joke and unfortunately this email was real. It was truly a deceptive and

purposeful misinformation letter. Unlike many of the LGA members that read this email and responded with the copy and paste letter of disapproval,

I spent some time reading up on ProcellaCOR. Most impressively was the presentation to the APA by Leigh Walrath on May 14, 2020 of the case

study of ProcellaCor's use on Lake Minerva. Wow, finally a chemical that can get rid of Milfoil with minimal environmental impact. I am certain that if

most of the people opposing the use of this chemical saw this presentation that they would consider a trial use for our beautiful lake.

Some of the information in the LGA letter seems a bit misguided. Hand harvesting is not working. It is a temporary and costly method of Milfoil removal which

only aggressively grows back each year. LGA board members, please come swim with me!!! Seriously. From June to October I snorkel across Sunset Bay to

Narrow Island several times a week. Our bay has been one of the focus points of the LGPC for the hand harvesting program. They have spent thousands of

dollars over many years and come July and August there will again be Milfoil everywhere. Last year was a very aggressive hand harvesting year, which for several

weeks following the harvest looked fine in the limited area of the harvest. By the end of September I saw that many of the denuded areas already had Milfoil

growing back. Please come swim with me!! to see that hand harvesting does not work!!!

The LGA comment about the concerns with the "rapid nutrient loading" is interesting in that the Milfoil decomposes every year. The continued aggressive

growth of Milfoil for years to come would certainly lead to more nutrient loading than a one time use of ProcellaCOR. I feel Sunset Bay is a particularly important

location due to the Huletts Island Marina. This Marina has between 600-1000 boat launches per year.

These boats tear up the milfoil and bring it to many other

areas of the lake. Every Monday morning following the busy summer weekend boat traffic, large amounts

of Milfoil float into my dock and boathouse.

I respectfully ask that the APA approve this small trial use of ProcellaCOR to see if perhaps we can slow the spread of Milfoil. As my grandchildren, (5th generation Lake George residents) learn to swim, I hope they can look forward to a Milfoil free bay in the near future. This could easily and affordably be accomplished with the use of ProcellaCOR. Hand harvesting does not work and the LGA's unfortunate stand on the use of ProcellaCOR is very disappointing. Please consider the use of ProcellaCOR.

Respectfully,

Dr. Daniel F. Kana
Sunset Bay
Huletts Landing NY

April 4, 2022

Adirondack Park Agency Board Members and Designees,

I am writing to voice my concern over the lack of approval from the Lake George Association for the use of ProcellaCOR to treat 2 areas of Lake George.

I have a small camp in Sandy Bay of Lake George which has been in my family since 1956. I have witnessed the deterioration of the lake in many ways over 66 years. I am active with harvesting Asian Clams from the bay which is a never ending task. I pick up floating milfoil after each storm on the lake. The sand is no longer firm as it was when I was a child and I complained to my mother as to how it hurt my feet to walk on it. Now it is soft and mucky in many areas of the bay.

I was thrilled to learn that a well-researched herbicide, ProcellaCOR has proven to be very successful in other lakes in New York State and it is not harmful for drinking the water. I do drink the water from Sandy Bay as that is my only water supply.

I financially support the LGA; I am on their mailing list. I was disappointed to get a form letter from the LGA almost scaring me into voicing opposition to the treatment of the lake. At this point I am sorry for the merger of the LGA and The Fund for Lake George, I have not seen this type of tactic from the LGA in the past.

We have to start prohibiting the exponential growth of milfoil in the lake and I believe the DEC and LGPC have done their homework to help protect the lake for many years at considerable expense with mats, hand harvesting, and boat launch inspections. They have worked hard for all of these initiatives. It is time for a new approach. Please vote to approve the use of ProcellaCOR to treat the 2 bays they are recommending. Hopefully in the future more areas can be treated, including parts of Sandy Bay to protect our lake.

Thank you for a vote of confidence in the LGPC and DEC.

Carolyn Curren

cc: Dave Wick, Jeff Kileen, Eric Siy

From: [Dean Torrey](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Projects 2022-0003
Date: Friday, April 1, 2022 8:37:31 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,

Dean M. Torrey

344 E 62nd St

New York, NY 10065

RECEIVED
ADIRONDACK PARK AGENCY

APR 04 2022

March 30, 2022

Dear Mr Walrath,
I am writing to urge the APT to deny the LGPC application to use the chemical herbicide Procella COR in our beautiful Lake George. Especially troubling is that 96% of its ingredients are unknown. Not to mention it is a chemical. Many of us drink LG water. Once we destroy the quality of LG water we can never reverse the damage. Please do not allow Procella COR to enter our lake!

Respectfully, Nancy Burke Assembly Pt



Whiteface Mt., Lake Placid, designed for Mary Ballou Design

NO. GCE24

WWW.LANASSHOP.COM

LANAS SHOP



From: [JAMES MORRIS](#)
To: [APA Regulatory Programs Comments](#)
Subject: Chemical use in Lake George
Date: Friday, April 1, 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.

There is no safe way to fight milfoil in Lake George with chemicals. We have been down this road before, and have discovered that chemicals are too dangerous for not only all aquatic life, but also much too dangerous for humans and other animals that depend on the lake for drinking water and recreational use. The current use of mats and hand harvesting to eliminate invasive plants is working well, and doesn't threaten the health of all who spend time in, on, and near this beautiful lake. Please don't go forward with any chemical treatment in Lake George.

Thank you for your understanding in this important matter,
Judith and James Morris
P.O. Box 607
Lake George, N.Y. 12845

Sent from my iPad

April 1, 2022

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

RECEIVED
ADIRONDACK PARK AGENCY

APR 04 2022

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,



Lawrence D'Arco
1202 Greenwich Dr
Albany, NY 12203

From: lois.perlman
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Herbicides
Date: Friday, April 1, 2022 3:35:36 PM

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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 ProcellaCOR in The Queen of American Lakes.

Sincerely,

NAME Lois Perlman

ADDRESS 515 West End Ave. NYC 10024

Sent from my iPhone

2731 Shasta Rd.
Berkeley, CA 94708
March 31, 2022

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

RECEIVED
ADIRONDACK PARK AGENCY

APR 04 2022

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,



Lucinda Olney, BSN
PHN

From: [Golden Sands Resort Motel on Lake George](#)
To: [APA Regulatory Programs Comments](#)
Subject: ProcellaCOR - Please deny use of ProcellaCOR
Date: Sunday, April 3, 2022 9:21:21 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.

Sincerely,

Liz Ramos
Golden Sands Resort
3654 Lake Shore Drive
Lake George NY 12845

From: [Meghan](#)
To: [APA Regulatory Programs Comments](#)
Subject: RE: APA Projects 2022-0003 and -0004
Date: Sunday, April 3, 2022 3:21:34 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:

Please 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,

Meghan Quillen

37 Broadacres

Queensbury, ny 12804

From: [Sarah Norton](#)
To: [APA Regulatory Programs Comments](#)
Subject: Adirondack Park Agency Public Comment
Date: Thursday, March 31, 2022 4:48:01 PM

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

Dear 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,

Sarah Norton

Sarah.eastman.norton@gmail.com

Sent from my iPhone

From: [Robert Behr](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 5:28:06 PM
Importance: High

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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 request that the Adirondack Park Agency deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ and that no other chemical treatments be considered to combat the invasion of Eurasian watermilfoil in Lake George at this time.

Chemical herbicides have been produced and promoted quite profitably in our country by an industry which has taken great care to protect itself, but neither the environment nor the users of its products from the overall consequences of their use.

Although government regulations often propose cautions such as "*reasonable certainty that no harm will result from aggregate exposure*", what is reasonable today is not only very subjective, but is also entirely limited by the data available in today's market, and the consequences from the application of toxic chemicals in pesticides, herbicides, insecticides, fertilizers, etc. as quick, cheap and easy short term solutions many times lead to unsatisfactory, expensive, unhealthy, and dangerous long term results, profitable for corporations, but not for society at large.

In this specific instance I witnessed a weird contraption operating in Oneida (Van Buren) Bay last summer, swam out to find out what was going on and had a long discussion with the operator of the barge pump

while his two coworkers were diving and hand harvesting the milfoil in two distinct areas where it had been located in the bay. These were three hardworking, determined, conscientious, and knowledgeable individuals, dedicated to the protection and preservation of our environment and producing tangible, positive results with no apparent possible negative side effects.

Since such environmentally sound activity is being successfully engaged in currently, I do not feel that more questionable options should be initiated at this time.

Respectfully,

Robert Davies Behr
15 Terrace Road
110 North Queen Street
Silver Bay, New York
Chestertown, Maryland

ia 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,

- 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 ..."

Over the past five years, the Park Commission and its partners have led a very successful hand-harvesting program, which the Commission itself has said will soon make milfoil "a thing of the past

From: [Carole Hunt](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 9:46:12 PM

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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.

My father built a home here in 1960 and my family and I have spent every summer there. We are avid swimmers and skin divers and are very well aware of the growth of milfoil. But there are too many unanswered questions regarding this current chemical.

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 Carole Hunt

ADDRESS 15 Sunset Lane, Lake George, NY 12845

From: [Patricia Trimboli](#)
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 7:55:07 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.

Sincerely,

Patricia Trimboli

1007 county route 6

Huletts landing, ny 12841

Sent from my iPhone

From: [Jillian Maginnis](#)
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 4:51:41 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 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.

As a scientist myself, having performed countless experiments with potential cancer drugs on animal models and human tissues in vitro, there are simply too many unanswered questions and not enough studies done 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,

Jillian Maginnis

5199 Bluff Head Rd.

Huletts Landing, NY 12841

From: [Scott Dubin](#)
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 11:09:30 PM
Attachments: [APA herbicide letter 3.31.22.doc](#)

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

I am attaching a letter in opposition to the above project. Please let me know if you have trouble opening these comments.

Thank you, Scott Dubin

From: [Dave Arthur](#)
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Common Sense Milfoil Treatment
Date: Thursday, March 31, 2022 8:37:33 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:

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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,

David & Jan Arthur

73 Tiroga Beach Lane

Ticonderoga, NY 12883

David Arthur/Business Development

Reliant Health Partners, LLC

109 Walsing Drive

Henrico, VA. 23229

Direct: [973.886.2806](tel:973.886.2806)

www.relianthp.com

From: [Joe Guidos](#)
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: Fwd: Please sign your name and send from your emails as well- if so inclined ProcellaCORTM
Date: Thursday, March 31, 2022 7:09:50 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:

As someone who grew up on Lake George and has vacationed there every year for over 50years, 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 don't gamble with the Lake!

Sincerely,

Joe Guidos
Ridgefield, CT

475-218-1159

From: conrojane68@gmail.com
To: [APA Regulatory Programs Comments](#)
Subject: No ProcellaCOR in Lake George
Date: Thursday, March 31, 2022 5:01:58 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,

On behalf of the Chautauqua-Conewango Consortium, A Waterkeeper Alliance Affiliate, I respectfully request that the Adirondack Park Agency deny the Lake George Park Commission's current application to use chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil in Lake George. Our Consortium has produced two position papers pointing out the negative impacts of the use of herbicides in Chautauqua Lake. Recently here, both Aquathol-K and ProcellaCOR have been used. The label for ProcellaCOR clearly indicates the native plants are sensitive to this chemical. Here, Coontail has been diminished and has not rebounded. The label also clearly indicates it should be used only in quiescent waters, neither Chautauqua or Lake George meet that requirement. Additionally, the DEC approved dosage of ProcellaCOR has had minimal effect on the milfoil.

Please do not repeat the mistakes made here at Lake George.

Sincerely,

Jane Conroe

Jane E. Conroe

Vice-Chair

Chautauqua-Conewango Consortium

A WATERKEEPER Alliance Affiliate

4000 Conewango Avenue

Warren, PA 16365

www.cccwaters.org

Direct: 716.665.0721



From: [Mark Finke](#)
To: [APA Regulatory Programs Comments](#)
Subject: Public Comments - Dr. Mark A. Finke on APA Project ID: 2022-0004 and APA:2022-0003
Date: Thursday, March 31, 2022 5:28:15 PM
Attachments: [APA Comments on LG herbicide application.docx](#)

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I submitted my comments via the APA portal. However, the format accepted in the comment field was not remotely receptive to the document I had prepared of my comments. I have attached the document as a word document as well as pasted in the content below. I am hopeful that doing so will provide the APA with my comments in a much more readable format.

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
RPcomments@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:

1. **Overview – (comments below)**
2. **Meetings –** A zoom recording of one “public” meeting held on 3/14/2022 (comments below)
3. **Resources**
 1. DEC Permit - 2022 Lake George Blairs Bay ProcellaCOR Pilot Treatment **The final permit for the treatment.**
 2. DEC Permit - 2022 Sheep Meadow Bay ProcellaCOR Pilot Treatment **The final permit for the treatment.**
 3. ProcellaCOR EC DEC Registration Decision - 2/22/2019 **The letter from the DEC informing SePro that the product can be registered in NYS.**
 4. 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.**
 5. Technical Summary - ProcellaCOR Selective Control of Invasive Watermilfoils 1/28/19 **A report by the product manufacturer**
 6. 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. I am a consultant and can facilitate the 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](#) –
 - **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.
 - 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”:*
 1. *public outreach with local homeowners,*
 2. *meetings with town officials*
 3. *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?
 - Aquatic Herbicides & Algaecides
 - Biologicals
 - Lake And Pond Dyes
 - Water Testing Products
 - 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.

- **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
- **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.
- **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.
 - **Lake Water Use Restrictions: NH Lakes and Ponds - Lists ca 20 instances of application of ProcellaCORE that required "use restrictions" following application.**
 - **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.**
 - **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 subset 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 mine.

- *Aquatic invertebrates: The EC formulation is moderately toxic to water flea with an EC50 of 1.32 mg a.i. equivalent/L. N* **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 supercede some of the label restrictions. Label statements for ProcellaCOR EC Herbicide include the following advice:*
 - 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.**
 - 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.**
 - *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.

Thanks,

Mark

Dr. Mark A. Finke, Principal
The Catalyst Perspectives Group

From: [Kate Lapham](#)
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 8:54:06 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 still too many unanswered questions from a scientific perspective to consider using this chemical in our lake.

I respect and share the thoughtful and well-researched concerns of the Waterkeeper and the LGA 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. We should not be implementing programs at this scale without information specific to Lake George, especially when other effective methods for addressing milfoil exist.

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

Sincerely

Kate Lapham

19 Sign Post Road, Lake George, NY

From: [Ann Kelly](#)
To: [APA Regulatory Programs Comments](#)
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 4:54:49 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.

Sincerely,

Ann E. Kelly

12 Pinehurst Ave.
Albany, NY 12203

From: [Celia Torrey](#)
To: [APA Regulatory Programs Comments](#)
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 11:34:07 PM

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Dear Mr. Walrath:

I am respectfully asking 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,

Celia Torrey

April 11, 2022
Adirondack Park Agency
P.O. Box 99 Route 86
Ray Brook, NY 12977
Re: Lake George Park Commission ProcCellaCOR Herbicide Application APA Project No. 2022-0003 and 2022-004

Dear Chairman Ernst and Commissioners,

In reviewing the application for use of ProcCellaCOR in Lake George I find it is likely to be harmful not only to the weed it targets, but to plants, animals and fish of Lake George. I believe the application is rushed, missing critical information, misleading, and incomplete. The LGPC response letter (4/6/2022) did not directly respond to most of my comments (3/31/2022) so I am reaffirming the need to address my scientific analysis.

For just one example, we already know that this toxin injures or kills the mysid *Americamysis bahia*, which is an opossum shrimp found in estuaries. The *A. bahia* is related to *Mysis relicta*, the opossum shrimp native to Lake George and critical in the aquatic food chain. You'd have to suspect that ProcCellaCOR would have a similar effect on it.

Little recognized in discussions of using this poison is that the makers of ProcCellaCor themselves have admitted statistically significant declines in some native plant species such as native watermilfoils, water marigold, and white water crowfoot. Even what we call the "good" form of milfoil, *Myriophyllum alterniflorum* could be poisoned. Recognizing its importance, I understand that there was interest by APA staff in pulling up the plants and replanting after the trial to protect them. Although unrealistic, it demonstrates the known risks associated with the application.

We know that ProcCellaCOR is used to target the invasive, *Nitellopsis obtusa*, the starry stonewort. It may be just as likely also damage the native stonewort *Nitella flexilis*, a vital Lake George macroalga.

The species richness of Lake George includes over 50 macrophytes and hundreds of phytoplankton, zooplankton, benthic invertebrates and fish. ProcCellaCor has not provided findings for its effect upon this large array of life forms. With limited peer-reviewed toxicology tests on a limited number of species and no site monitoring (except macrophytes), the effect of ProcCellaCor on plants and animals in the Lake George ecosystem is, for now, mostly unpredictable, and immeasurable.

This application also has obvious conflicts of fact. ProcCellaCor is described as a "selective systemic herbicide" for management of freshwater aquatic vegetation in slow-moving/quiescent waters with little or no continuous outflow." Yet Lake George is not a "still water" system. It continuously flows into Lake Champlain via the La Chute River with an average flow of 850cfs. Since 83% of the water in Lake George is released at the outlet, Lake George is modeled as a riverine system (National Science Foundation and US Army Corps of Engineers). We don't know the dispersal and transport risks of using this chemical in this dynamic system.

We also know that ProcellaCor causes rapid decomposition of the plants it attacks, causing the rapid release of phosphorus into the water. Phosphorus feeds algae blooms and we've already had eight harmful algal blooms (HAB) in the last few years.

Also, 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. Removal of milfoil beds by hand harvesting eliminates the risk of HAB and eutrophication from excessive phosphorus release and dissolved oxygen depletion.

We also know that when herbicides with the same mode of action are used repeatedly at the same site, some of the weeds develop resistance and could even end up becoming dominant.

Because the US EPA relies on only a few standard plant and animal species for toxicity testing in its approval process, this model is severely flawed and unreliable for Lake George without further testing.

Also, we have no way of knowing the extent of impact of ProcellaCOR on the Lake George ecosystem since the APA model appears to only focus on plants. The APA Act insures optimum overall conservation, protection, preservation, development and use of the unique scenic, aesthetic, wildlife, recreational, open space, historic, ecological and natural resources of the Adirondack Park. Without pre and post monitoring of phytoplankton, zooplankton, benthic invertebrates and fish food chain what we have is just not thorough enough for one of America's greatest lakes.

In short, the impact of ProcellaCor on the Lake George ecosystem cannot be scientifically based on the information you've been given. What's missing is toxicity testing, especially for the array of native Lake George plants and animals. Therefore, trials of ProcellaCOR should not be conducted in this unique resource.

What I summarize here is explained in scientific detail in my letter of March 31st. It's not easy reading, but it's all there. You all know my work. I have dedicated my professional life to studying and protecting Lake George.

I urge the APA to table this application and take time to fully investigate the effects of this toxin. I suggest that The Lake George Park Commission needs to involve the Lake George scientific community in examining and testing this chemical. Toxicity studies for native plants and animals important to the Lake George ecosystem need to be conducted in a laboratory prior to real world use.

Thank you for your consideration of my concerns. I am happy to discuss any questions you may have in an effort to develop a sound macrophyte management plan for Lake George and protect our source of drinking water.

Very truly yours,
Carol D. Collins, Ph.D.
Limnologist

Leish R. Walrath

3/31/22

Adirondack Park Agency

PO Box 99

RECEIVED
ADIRONDACK PARK AGENCY

Ray Brook, NY 12977

APR 08 2022

RE: AFA Projects 2022-00034 - 0004

Dear Mr. Walrath,

It has been brought to my attention that the L&PE has submitted an application for the use of the chemical herbicide ProcellaLOR™ to treat Eurasian watermilfoil, We all that love

Lake George wish to remove the invasive species that have entered our precious waters, we do not want to create another problem to our lake. We need more positive research/outcomes to put anything more in our lake to chase out the

negatives. At this time, please
deny the currently proposed use
of the chemical ProcellaCOR in
our majestic waters of Lake George.

Sincerely,
Nancy Munro like

186 Lake Placid

Lake George, NY 12845