CHATEAUGAY LAKE FOUNDATION
www.chateaugaylakefoundation.org

PO BOX 222
LYON MOUNTAIN NY 12952

June 11, 2025

Mr. Aaron Ziemann
Adirondack Park Agency
PO Box 88
1133 State Route 86
Ray Brook, NY 12977

Re: APA Project No. 2025-0078

Dear Mr. Ziemann,

I am writing on behalf of the Chateaugay Lake Foundation (CLF) to respond to objections raised by Protect the Adirondacks in their comments on our permit application and to provide additional background on our decision to pursue the use of ProcellaCOR EC to treat Eurasian water milfoil (EWM) in Chateaugay Lake.

Response to Comments

Objection to Proximity of 2025 Proposed Treatment Area D to 2024 Treatment Area DD. Treatment Area D is upstream of the Area DD that was treated last year and its northern edge lies within the dilution zone for last year's treatment. However, the residue sampling that is required for post-treatment monitoring included a sample site in this part of the dilution zone, which showed that levels were below the minimum (< 1 ppb) within 7 hours of treatment. So any impacts were minimal and may not even have extended to this upstream area.

The CLF is proposing to treat Bed D this year in part to prevent reinfestation of Bed DD from fragments traveling downstream. Thus, this year's treatment will be protective and extend the period of milfoil control in downstream Bed DD. Although the furthest reach of the dilution zone for treatment area D extends to Bed DD, we expect that residue levels will be minimal in the zone of overlap. The treatment areas themselves do not overlap.

Objection to Multi-Year Treatment in Same Waterbody. The CLF has developed a multi-year treatment plan that would treat the EWM beds that have developed throughout the lake system on a rotating basis, expected to be periods of five to seven years, depending on resources and conditions. We are not proposing to treat the same areas on an annual basis. For any one area, treatment would be interspersed with years of monitoring and hand-harvesting, to extend the period of control. The herbicide manufacturer warranties effectiveness for three years, but the plan is to increase that interim.

Chateaugay Lake is a large lake system comprising 3,400 acres and three different segments, with some 26 established milfoil beds that have been targeted for treatment. A comprehensive aquatic plant survey in 2021 found that milfoil had infested 695 acres, almost half of the littoral zone. It would not be financially feasible or environmentally responsible to attempt to treat such a large infestation over a period of one-two years as seems to be suggested. Nor would it be effective to just treat part of the infestation. This would leave managed areas constantly subject to reinfestation, which is what occurred during the prior 17 years of reliance on hand-harvesting, when resources were not sufficient to hand-harvest all of the infested shoreline.

Reinfestation occurs not only from auto-fragmentation and spread of plant fragments from wind and water, but from boat traffic that carries fragments throughout the system. Chateaugay Lake is very popular for boating and has a state boat launch on the Narrows. This shallow waterway is conducive to the development of dense milfoil beds. Boats travel from one part of the lake to the other through this channel and pick up plant fragments that are dispersed elsewhere, perpetuating spread.

A comprehensive approach to EWM control is needed and ProcellaCOR EC offers a more cost-effective option to achieve this than non-chemical management. Spacing treatments around the lake and over time will help mitigate any non-target impacts and protect the ecosystem overall.

Concern About Long-Term Impacts of Chemical Treatment. The research and testing that has been conducted and reviewed by national and international regulatory bodies, as well as the New York state health and wildlife agencies, all indicate that ProcellaCOR EC is a reduced risk herbicide. It has been shown to quickly degrade in aquatic applications, when used as directed, and does not bio-accumulate. It's mode of action (auxin mimic) requires hormone receptors unique to plants, so impacts on animals have been found to be minimal. It is highly specific for milfoils with limited susceptibility of other aquatic plant species. The standard concentrations for aquatic applications are well below the threshold for drinking water restrictions, leading to use of ProcellaCOR EC to control EWM in public drinking water supplies. The effectiveness of this herbicide at low concentrations is another factor supporting safe use.

Mandating Management Plans and Surveys. The CLF has concluded that a phased, multi-year integrated management plan that includes chemical treatment as well as non-chemical management (hand-harvesting) is the most promising way to bring the large, established EWM infestation in Chateaugay Lake under control. We have learned over 18 years of raising funds and managing control efforts that hand-harvesting is not enough on its own or would require levels of funding that are not available for lake organizations such as ours that rely on voluntary small donations. Our management plans are regularly updated with the help of professionals in the aquatic invasive management field and we anticipate a continued effort to implement regular monitoring and periodic plant surveys. It should be noted that pre- and post-treatment plant surveys are already a requirement for obtaining permits for use of herbicide.

Also, it should be recognized that the level of effort is subject to resource constraints. In addition to funds raised from private donations and fundraising events, the surrounding Towns provide some support. But it is limited, and the budgets of northern Adirondack towns are chronically strained.

There is no state funding support for control of large established EWM infestations like that of Chateaugay Lake, even for lakes like Chateaugay that have public boat launches. Therefore, we feel that the existing guidelines and requirements are sufficient and that imposing additional mandates would not be justified and would unfairly burden voluntary lake associations by requiring activities that resources might not allow.

Additional Background

In the 18 years that the CLF has raised funds and managed control efforts, we have seen the share of EWM-infested shoreline steadily increase. Surveys showed it had spread from 40 acres in 2002, to 200 acres in 2006, to 695 acres in 2021 (48 percent of the shoreline waters). This occurred despite the expenditure of over $700,000 on control efforts, primarily hand-harvesting—about $41,000 per year. The initial management plan developed by the Adirondack Watershed Institute in 2006 estimated that it would take $1.5 million over three years to achieve lake-wide control using hand-harvesting. There was never a realistic possibility of raising this sum. Therefore, we have had to rely on strategic spot control to slow, but not contain, Eurasian milfoil's spread. It has been a losing battle.

During this time, we have observed that despite repeated hand-harvesting of the same areas, EWM persists. Dive crews have noted that when a bed of mature milfoil is harvested and the surface canopy is removed, the next year the area will be full of new shoots. Despite divers' best efforts to remove the plant's entire root structure, it is rhizomous and fragments remain. As a systemic herbicide, ProcellaCOR EC offers a more effective treatment for truly controlling the plant's spread.

We are encouraged that ProcellaCOR EC offers a more cost-effective approach that is desperately needed to control Chateaugay Lake's large and growing Eurasian water milfoil infestation. One of the beds that we propose to treat (Bed W) is a large 100-plus acre bed of varying density in the South Inlet of Upper Chateaugay. This bed at the upstream source of the lake contributes to EWM spread throughout the lake system. Although this area is comprised of state underwater lands and we will not be receiving any state funds to treat, we have prioritized controlling the EWM in this bed as a key element of CLF's overall control strategy.

We urge the APA Board to support our comprehensive management strategy by approving our permit applications to treat this bed and the other beds in the Upper Lake that we are proposing to treat, which are similarly popular with boaters and anglers and a source of spread throughout the system.

Thank you for your consideration of these comments.

Sincerely,

Mary McLean Johnson

Mary McLean Johnson
President, Chateaugay Lake Foundation