

From: [Linda Crivella](#)
To: [APA Regulatory Programs Comments](#)
Subject: 2023-0036
Date: Thursday, October 19, 2023 11:46:42 AM

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To Whom It May Concern.

My family, the Higgins family, have owned a home on Paradox Lake for over 50 years with 4 generations enjoying our beautiful lake.

During that time, we have noticed the drastic change with the weed overgrowth in the lake and how it has interfered with recreational activities on our lake.

The Paradox Lake Association has been trying for years to combat this problem but has never been able to get in front of this weed overgrowth problem.

Our family totally agrees with the PLA's plan to treat our weed infestation in the lake.

We want our future generations to be able to enjoy this wonderful sanctuary for many more years to come.

Thanks,
Linda Higgins Crivella



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**Conservation Director
and Counsel**

May 3, 2023

Peter Frank
New York State Department of Environmental Conservation
Division of Lands and Forests
625 Broadway
Albany NY 12233
adirondackpark@dec.ny.gov

**RE: Public Comments on Application of the aquatic herbicide
ProcellaCOR EC in Paradox Lake to control Eurasian watermilfoil**

Dear Peter:

Protect the Adirondacks has a number of concerns about the proposed ProcellaCOR treatment on Paradox Lake. The purpose of this project is to reduce the presence of the aquatic invasive plant Eurasian watermilfoil (*Myriophyllum spicatum*). As an initial matter, it is unclear if this proposal is being proposed and implemented by the Paradox Lake Association or by the Department or some other entity. As with other recent proposals for the application of ProcellaCOR, this project appears to be high risk, premature, and poorly planned.

The presence of Eurasian watermilfoil (EWM) was first reported in 2008 and has been controlled with hand harvesting since that time. Of all the treatment methods, hand-harvesting has proven the most successful over the years, especially by utilizing large, trained diving crews. The high cost and intensive labor involved are the main drawbacks of hand-harvesting, but it's highly effective at reducing EWM sites and limits disturbance of native aquatic plant populations. Unfortunately, EWM is an invasive plant that will never be fully eradicated from our waters. Once a lake is infested, the most successful efforts have strived to contain it with regular treatments. This is the reality on Paradox Lake, just as it is in many Adirondack lakes. EWM control is a fact of life that must be continued year after year.

Protect the Adirondacks

PO Box 48, North Creek, NY 12853 · 518.251.2700

www.protecttheadirondacks.org · info@protectadks.org

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Paradox Lake has limited growth of EWM: The materials indicate that EWM is “present throughout Paradox Lake”, but the materials also state that there is “limited growth of [EWM] in Paradox Lake” and that due to the low level of infestation of EWM, “the impact of [EWM] on native species is limited”. While it is possible that EWM will continue to grow if left completely unmanaged, EWM was successfully reduced as a result of regular hand harvesting. According to the materials, 2023 is only the second year of a three year intensive effort to control EWM. In 2022, there was “significant progress” with hand harvesting of EWM. Hand harvesting without ProcellaCor application should be continued as a treatment method at least through the third year of the plan before ProcellaCor is approved for use.

Minerva Lake Experience: The Adirondack Park Agency (APA) previously permitted the use of ProcellaCOR in Minerva Lake, in southern Essex County. In Minerva Lake only part of the lake was proposed for treatment but the chemical spread to the whole lake as the sequestration of the treatment area failed.

Chautauqua Lake Experience: ProcellaCOR was also used in Chautauqua Lake. The Chautauqua-Conewango Consortium assessment of the 2020 treatment states: “The June 29, 2020 application of ProcellaCOR EC to 86.4 acres of Chautauqua Lake was conducted by Solitude Lake Management. The third-party monitoring report (Report) was submitted by Princeton Hydro, LLC and made public on February 3, 2021. In this Report, an important conclusion was that the reduction of the target species, Eurasian watermilfoil, from the 2020 treatments was not significant. Thus, the treatment program was not successful in achieving one of its main goals. The failure to significantly reduce the biomass of this species raises the question of the efficacy and cost effectiveness of the use of ProcellaCOR EC in the future.”

Questions that merit greater examination: The proposed use of ProcellaCOR to treat EWM on Paradox Lake raises many questions. These include:

- The aquatic plant diversity of the lake is relatively high. Impacts to non-target plants have been reported in recent treatments in other lakes and ponds. The proposal for use of ProcellaCOR has not provided adequate information about the impacts on non-target aquatic plants.
- The species richness of the lake is quite high, with hundreds of phytoplankton, fish zooplankton, and benthic invertebrates. The proposal for use of ProcellaCOR has not provided any pre-and post-treatment findings for macrophytes, algae, fish, benthic invertebrates or zooplankton native to Adirondack lakes. Much more information is needed to assess these impacts.
- The historic information about hand-harvesting treatments is inadequate. There is little information on annual hand-harvesting efforts, costs, plants/quantities harvested, or anything to evaluate the efficacy of these efforts.
- It appears from the application that chemical treatments are envisioned in the future as a means for controlling EWM (at least for 2024). There is inadequate information in the application about impacts from chemical treatments

undertaken on a regular basis into the future.

Questions merit full examination in an official APA Adjudicatory Public Hearing:

The APA ordered and conducted a formal adjudicatory hearing on the proposed use of the aquatic herbicide Sonar (SeaPro) by the Lake George Park Commission two decades ago, and the APA Board voted the project down in January 2003. ProcellaCOR is less proven than Sonar was at time. Though the APA has refused to consider any formal adjudicatory hearings for the last 12 years, this project merits a high level of public scrutiny, opportunity for independent expert testimony and cross-examination, and public involvement. The APA's refusal to hold formal adjudicatory public hearings on major projects over the last dozen years has been an unfortunate miscarriage of its regulatory responsibility and shows a disturbing hubris in its regulatory review.

Without the benefit of fully developed record that would be produced during a formal adjudicatory hearing on the proposal, Protect the Adirondacks is opposed to the approval of any proposals for the application for ProcellaCOR treatment on Paradox Lake, or any Adirondack lake. The use of ProcellaCOR must be fully evaluated in an adjudicatory public hearing.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to make these public comments. We may have additional comments as our review of this matter continues.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia Braymer,
Deputy Director

From: [Neumann, Susan](#)
To: [APA Regulatory Programs Comments](#)
Subject: Aaron Ziemann and those concerned,
Date: Sunday, October 22, 2023 2:40:20 PM

Some people who received this message don't often get email from susan.neumann@eku.edu. [Learn why this is important](#)

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I am voicing my support and hope for applying the herbicide to Paradox Lake (reference #2023-0036) as a remedy to the exponential growth we are experiencing with milfoil. The Paradox Lake Association has poured extensive time, money, and resources into using conventional measures to curb the spread of milfoil, but, without natural predators or checks in place, our efforts have done little to reduce the spread of this invasive species. Having taught high school biology as a career, I am well aware of the many mistakes made in fighting invasive species by introducing equally damaging predators. While the research on ProcellaCOR are limited, they point to an effective and safe alternative. Please help Paradox Lake to fight this invasive species by allowing the use of ProcellaCOR in the right areas. Thank you. Susan Neumann

Susan Neumann

From: noreply-pc@apa.ny.gov
To: [APA Regulatory Programs Comments](#)
Cc: mlindsay2@nycap.rr.com
Subject: APA Project 2023-0036 Public Comments
Date: Monday, October 9, 2023 2:01:27 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 RPcomments@apa.ny.gov.
Please copy "2023-0036, Allen Lindsay, mlindsay2@nycap.rr.com" into your message for our reference.

Attn: Aaron Ziemann
Comments from: Allen Lindsay
Email from: mlindsay2@nycap.rr.com
Address: 182 S Pine Ave 12208
Re: Agency Project 2023-0036, Paradox Lake Association

My Comments:

Millfoil is really bad stuff, as I know from experience in several other waters. All safe efforts to control it should be used.

From: [Dan](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Project No. 2023-0036
Date: Monday, October 23, 2023 9:23:04 AM

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Dear Aaron Ziemann,

I am writing to express my enthusiastic SUPPORT for the application of the aquatic herbicide ProcellaCOR EC as proposed by the Paradox Lake Association. As a former board member and former president of the Association, I have observed the extensive volunteer hours and financial resources that have been dedicated to attempt to control Eurasian Watermilfoil, with limited results. ProcellaCOR EC is the tool we need to attempt to get the problem under control and trust that the APA will agree.

Thank you for your consideration,

Dan Gorke
23 Idlewild Way
Paradox, NY 12858
C: 518-703-3574
GorkeDan1@aol.com

From: [Joe LaBato](#)
To: [APA Regulatory Programs Comments](#)
Cc: paradoxlakeassociation@gmail.com
Subject: APA Project No. 2023-0036
Date: Wednesday, October 18, 2023 8:57:17 AM

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Mr. Aaron Ziemann
NY State Adirondack Park Agency:

Thank you for the opportunity to comment on the above referenced project application, which is currently under review by your agency.

We have owned property on Paradox Lake since 1981 and have enjoyed the many things it has offered our family. Our children have grown up there and now our grandchildren are following our family traditions of swimming, fishing, boating and enjoying the natural beauty and tranquility of the lake. We hope to continue to be able to do so for many years to come.

The risks Eurasian Watermilfoil poses to the lake are frightening to us, and we fully support the efforts underway by the Paradox Lake Association, of which we are members, to treat and control this invasive plant by using the proposed herbicide ProcellaCOR. We believe it is our only viable option to ensure that the lake remains available for boating and swimming and that the lake's biodiversity remains in tact for future generations.

Sincerely,

Joseph LaBato
Linda LaBato
68 Sunset Dr
Tinton Falls, NJ 07724
732-616-7998
joelabato@aol.com

From: [John Shirley](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Project No. 2023-0036
Date: Wednesday, October 25, 2023 9:44:27 AM

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Dear Aaron Ziemann,

I am writing to support the application of the aquatic herbicide ProcellaCOR EC as proposed by the Paradox Lake Association to control Eurasian Watermilfoil.

Sincerely,

John Shirley
John.E.Shirley@gmail.com
15 Idlewild Way
Paradox, NY 12858

From: [dmg1656](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Project No. 2023-0036
Date: Monday, October 23, 2023 12:36:24 PM

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Dear Aaron Ziemann,

I am writing to express my enthusiastic SUPPORT for the application of the aquatic herbicide ProcellaCOR EC as proposed by the Paradox Lake Association. As a former board member and former president of the Association, I have observed the extensive volunteer hours and financial resources that have been dedicated to attempt to control Eurasian Watermilfoil, with limited results. ProcellaCOR EC is the tool we need to attempt to get the problem under control and trust that the APA will agree.

Thank you for your consideration,

Deb Gorke

23 Idlewild Way
Paradox NY 12858

252 Deerwood Circle #1
Naples FL 34113

dmg1656@aol.com

816 820 9858

Sent from my iPhone

From: [John Guzewich](#)
To: [APA Regulatory Programs Comments](#)
Cc: [John Guzewich](#)
Subject: APA Project NO. 2023-0036: Application of the aquatic herbicide ProcellaCOR EC within two treatment zones in Paradox Lake (Inlet and Narrows), to control Eurasian water milfoil.
Date: Friday, October 6, 2023 1:50:45 PM
Attachments: [APA ProcellaCOR EC Milfoil Paradox Lake.pdf](#)

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Aron Ziemann,

Attached find a letter in support of this application. Please feel free to contact me with any questions.

Jack Guzewich
61 Melrose Ave.
Albany, NY 12203
Cell: 301-442-2413
Home: 518-438-1308
johnguzewich@gmail.com

From: [James Clarke](#)
To: [APA Regulatory Programs Comments](#)
Cc: [Peter Clarke](#); [quinn](#); [conclarke7@gmail.com](#)
Subject: Attn. Aaron Ziemann Project no. 2023-0036
Date: Wednesday, May 3, 2023 11:48:04 AM

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Hello Aaron

Although I may be reiterating the concerns expressed by others, I wanted to respond with my concerns related to the major project public notice and ProcellaCOR's application within Paradox Lake.

1) ProcellaCOR, as advertised by the manufacturer, is intended for application within quiescent water. The application at Paradox Lake is to apply ProcillaCOR to the narrows and the lake inlet. If you had to pick the two most non-quiescent areas of the lake it would be the narrows and the lake inlet. The flow in these areas is strong enough that the vegetation on the bottom of the lake is laying flat as it is pushed over by the current. This makes the idea of a "targeted application" seem extremely unlikely to happen. It seems more probable that if applied in these two areas ProcellaCOR will be distributed throughout the entire lake.

2) Due to the inability to have a "targeted application" I am concerned that the negative affects of ProcellaCOR on aquatic plant and animal life will be suffered lake wide. It's my understanding that ProcellaCOR will quite possibly eradicate our native Milfoil species, Coontail as well as cause considerable damage to our water lily population. As lichens are an indication of clean air, snails are an indication of clean water. In a conversation with a SUNY ESF student who studied ProcellaCOR's effect on snail populations it's my understanding that its use will eradicate our snail population. We all are aware of the delicate balance that exist within an ecosystem and I'm concerned about the eradication of plant and animal species by this herbicide and what the long-term effects of that will be.

3) Many camps on Paradox Lake source their domestic water directly from the lake. ProcellaCOR is a surface application which if I understand correctly then precipitates to the bottom of the lake to affect Milfoil. Those of us who source our domestic water from the lake have our pumps and suction lines on the lake bottom where the ProcellaCOR concentration will be the highest. Will there be post application water usage restrictions and what determines for what duration those water restrictions will be in place?

4) The APA's approval of ProcellaCOR's use within Lake George I understand to be highly contested by members of the Lake George Lake Association. I think I may have read there's even a lawsuit related to its approval due to what LG LA members feel was a lack of sufficient research related to the overall effects of the herbicide. Will the APA continue to approve ProcellaCOR's use elsewhere within the park prior to that lawsuit concluding?

In writing this I want to acknowledge that it's very easy to cast aspersions at something and if you don't have a better solution to offer its not very helpful towards ultimately solving a problem. Are there other options? Are we comparing ProcellaCOR to another aquatic herbicide that possibly has a longer track record? In the limited amount of research I have done on ProcellaCOR it doesn't seem like there's an abundance of data related to its use. It seems like this product has gone from the lab to the lake without a lot of data collected in controlled environments fist. If that is true the herbicides use within Adirondack Lakes seems like a risky experiment. Are there other options the APA is considering?

I don't envy your situation. I'm sure this is a difficult decision to make. Clearly, milfoil is becoming an issue within our Adirondack lakes. I appreciate the opportunity to express my concerns related to its use and hope you'll stay in touch with landowners as the process continues.

Regards

Jim Clarke

P.S So they can stay informed as well, Cc'd on this email are my sons Con and Quinn who have been active participants in the manual removal of milfoil from the lake as well as my father Peter.



May 3, 2023

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- Douglas Stewart

Acting Executive Director
 Raul J. Aguirre

Peter Frank
 NYS Dept. of Environmental Conservation
 625 Broadway
 Albany, NY 12233
(via electronic submission)

RE: Herbicide Treatment of Invasive Eurasian Milfoil in Paradox Lake

Dear Bureau Forest Preserve Management Chief Frank,

On behalf of the Adirondack Council, I'd like to thank you for the opportunity to provide comments on the proposed herbicide treatment of invasive Eurasian watermilfoil (EWM) in Paradox Lake. The treatment area is classified as underwaters of Hammond Pond Wild Forest, and therefore triggers the Inter-Agency Guidelines for Implementing Best Management Practices to Control Invasive Species on DEC-Administered Lands of the Adirondack Park (guidelines).

As the first work plan under the new guidelines, the Council appreciates the agencies' intent to clarify the process. The Council provides the following comments on the substantive elements of the work plan.

Adjudicatory Hearing

Adjudicatory hearings allow for outside evidence to be considered by an impartial judge and have historically played an important role in assessing actions on public and private lands and waters, including striking down the use of Sonar in Lake George (well over 14 years ago). Furthermore, the recent Article 78 challenge regarding Lake George's herbicide applications further underscores that hearings are needed to serve their function of providing additional information that is not considered/presented by an agency. The Council requests that an adjudicatory hearing be held on the application of ProcellaCOR in Paradox Lake.

In reviewing the draft work plan, the Council provides the following comments:

1. Work Plan Elements:
 - a. Applicant: The work plan should include the name of the applicant.
 - b. Template Needed: The Council suggests that a work plan template that contains all of the requisite information, including the nine criteria outlined in the guidelines, be developed. This would increase understanding and efficiency for all interested parties, including agencies, lake associations/applicants, and the public.



In addition, the template should track coinciding permits that are being sought. For example, for this lake, two permits are also being sought to apply the herbicide: an APA wetlands permit and a DEC pesticides permit, along with State Environmental Quality Review Act approval.

- c. Proposed Best Management Practices (BMPs): The guidelines call for an assessment of BMPs, but the work plan only evaluates two herbicide applications; it does not consider solely continuing with non-chemical methods. The alternatives should include hand-harvesting. In addition, there is relatively little data or information demonstrating the efficacy of hand harvesting through time. The work plan should include a multi-year (beyond two) look.

In addition, the work plan notes that “Milfoil control from the proposed herbicide application is expected to exceed 95% of the treatment area, and last for at least two growing seasons.” This statement indicates the herbicide will last about two years, which means additional applications will be need. The Council continues to raise that we do not yet know what the long-term ecological impacts of what this herbicide will be, and that is concerning.

2. Ecological Concerns: The guidelines require that when evaluating BMPs and species-specific control methods, “the potential for impact must be carefully evaluated through the Work Plan and permitting process and must outweigh the risks associated no-action alternative.” For the following reasons, the Council believes there are additional impacts that need to be considered within the work plan before determining if the impact outweighs the risks:

- a. Photic Zone: The Council continues to assert that it is unclear whether ProcellaCOR levels will be back below detectable levels *in the photic zone* before the seven-day collection period (as the applicant states, degradation relies on photolysis). It is unclear whether it will degrade at depths below the photic zone, yet there is no provision for sampling at depth. With deeper treatment zones proposed, it is reasonable to consider that ProcellaCOR could move out of the photic zone and reside for much longer at depth, making this one of the more significant concerns.
- b. Quiescent Waters: Applying ProcellaCOR to the inlet section could raise concerns of this not being applied to “slow-moving, quiescent waters” as the label specifies. This is like the equivalent of dropping a pile of confetti in front of a fan and saying that it is going to “dilute more quickly” that way. This may increase the likelihood of ProcellaCOR moving below the photic zone in that treatment area.

Impacts to milfoils outside of the treatment zone were reported following Minerva Lake’s application of ProcellaCOR. Therefore, there is the potential that impacts of these proposed application may extend to other areas of the lake. Additionally, there has not been sufficient study on the potential impacts to benthic invertebrates to affirm that there will not be substantial risk to these sensitive communities.

- c. Water Sampling: Given the info above, a composite water sample should be collected. Currently, samples will only be collected at elbow depth. Due to ProcellaCOR’s seeming reliance on photolytic processes to ensure its rapid degradation, sampling through the

water column should be compulsory to establish that the major degradates of the parent compound are not persisting at depths where photodegradation is slower or precluded. Circulation models could be useful in understanding where degradates that do not photodegrade are likely to accumulate. This is of particular concern, due to the fact that the product label suggests that ProcellaCOR is suitable for slow moving/quiescent water.

- d. Species Assessment: According to the work plan, “Per APA staff (Aaron Ziemann, 3/16/23) four species of concern are recorded within the area of Paradox Lake. These are one bird species, one fish species, and two (monocot) plant species, one of which is Alpine Pondweed (*P. alpinus*).” The Council would like to clarify that it is not clear that ProcellaCOR has “no impact on monocots” – it would be safer to say that it does not *appear* to have an *immediate impact* on monocots because there is no long-term evidence to support this claim. We also draw attention to the fact that no invertebrates were considered in the plan.

In conclusion, the Council still has serious concerns about the unknown (and recurring) use of ProcellaCOR in Adirondack waters. Thank you for reviewing our comments.

Sincerely,



Jackie Bowen
Director of Conservation

From: [Richard Fregonese](#)
To: [APA Regulatory Programs Comments](#)
Subject: Eurasian Watermilfoil Project ref# 2023-0036
Date: Wednesday, October 18, 2023 8:42:13 PM

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Mr Ziemann,

I am writing to you in support of the use of the herbicide ProcellaCOR in Paradox Lake, NY.

My family and I have been property owners on the lake for over 50 years.

Sadly for a number of years, we along with our neighbors & the Paradox Lake Assoc (PLA) have been seriously battling the invasive!

We have read multiple reviews & research articles on this herbicide and its positive effects.

We wishfully hope that this 3 step process will help to bring Paradox Lake back to its pristine state, that we have loved & enjoyed throughout the years!

Sincerely

Rich Fregonese & extended family

From: [Bill Benninghoff](#)
To: [APA Regulatory Programs Comments](#)
Subject: Feedback Regarding Project 2023-0036
Date: Wednesday, October 18, 2023 1:01:28 PM

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Mr. Aaron Ziemann,

I am providing feedback on Project 2023-0036 regarding treatment for Eurasian Watermilfoil on Paradox Lake. My father owns a cabin right near Paradox Lake and our family has been enjoying swimming and fishing in that lake in the summers for over 50 years. I am in support of the three year proposed plan to treat the Eurasian Watermilfoil with the herbicide ProcellaCor. My understanding is that this treatment will be safe for the other organic life in the lake and will ensure that the lake remains swimmable for years to come.

Thanks for listening,

William Benninghoff
Arlington, Texas USA

From: [Glenn Sullivan](#)
To: [Zemann, Aaron C \(APA\)](#)
Subject: Fwd: Feedback from the Paradox Lake Association regarding the proposed ProcellaCOR treatment.
Date: Monday, June 12, 2023 5:32:20 PM

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Hi Aaron,

Please add this email string to the Paradox Lake application file.

Have you had any feedback from NYSDEC Lands and Forests regarding the Work Plan we submitted? It was posted in the ENB weeks ago and there hasn't been any activity that I can see.

Glenn Sullivan
Certified Lake Manager
Project Manager



M 908-310-8775



solitudelakemanagement.com

----- Forwarded message -----

From: Bob Hauserman <bobhauserman17@gmail.com>
Date: Mon, Jun 12, 2023 at 3:11 PM
Subject: Re: Feedback from the Paradox Lake Association regarding the proposed ProcellaCOR treatment
To: Glenn Sullivan <gsullivan@solitudelake.com>

Glenn,

See the response below from one of our two residents who had submitted comments of concern to the APA. I'd appreciate if you can forward this to Aaron so it becomes part of the record for our application with the APA.

Bob Hauserman

On Mon, Jun 12, 2023 at 2:06 PM James Clarke <clarkeland@gmail.com> wrote:

Hi Bob

I just opened an email from Janice and it made me realize I hadn't responded to your message. I appreciated your prompt and informative reply and apologize for the delay with mine.

Clearly we have a situation that unless we were able to attain an army of divers has digressed to the point that control through hand harvesting seems unlikely. From your reply I get the impression that you and the board are weighing the options and taking the decision quite seriously.

I hope I haven't come off as an alarmist but my lifelong affiliation with the horticulture industry has left me with little trust for what chemical companies will claim in order to sell their product. I have had friends who work in the lawn care aspect of the industry who have developed skin cancer, had their larynx removed due to cancer and two that have died from cancer that I have little doubt the source of. An old photo of a truck with maskless men spraying DDT on a beach full of people comes to mind. The sign on the truck read "DDT harmless to humans". We all look at life through the lens of our experiences and I hope you can understand my experience's have led me to question claims of personal and environmental safety related to herbicides.

There have certainly been more problem free times to be the president of the lake association. I admire your willingness to take on what has to be the largest threat to our lake ecosystem and appreciate and applaud your efforts to make an informed decision.

Thank you again for your reply.

Jim

On May 9, 2023, at 10:23 AM, Bob Hauserman <bobhauserman17@gmail.com> wrote:

Jim,

My name is Bob Hauserman. I believe we met last summer when you were diving for milfoil in Crawford Cove. My dock is in Crawford Cove and I'm also the president of the Paradox Lake Association. Thanks for all your work over the years diving to remove milfoil.

I'm reaching out to you as a result of the APA sharing your feedback to them regarding the proposed use of ProcellaCOR to reduce the milfoil population in Paradox Lake. I am personally happy that you took the opportunity to express your concerns so they can be discussed and hopefully addressed. I understand your concern for the health of Paradox Lake and the potential impact of the treatment on the native wildlife in the lake. Every Paradox Lake Association board member was also concerned for the health of the lake when we started looking at ProcellaCOR as a potential milfoil treatment option. We all care deeply about maintaining the high quality of the lake water and its wildlife and this is also the primary mission for the PLA. However, after looking through the data that is available, and the real world experience from 4 years of use in over 200 lakes, we each became comfortable with the short and long term safety of the treatment.

Your letter to the APA surfaced a number of issues the PLA considered when we were exploring the options available to us to try to regain control over the milfoil population in the lake. I'm available for a conversation to help you understand our thought processes that led us to decide that ProcellaCOR was the best path forward, if you are interested. Just let me know and we can find time to meet, zoom, or just exchange emails.

There are a couple of points that I think I should clarify that may help allay some of your concerns.

- Our planned treatment zones are not in the faster moving waters of the Inlet Creek or the narrow portion of the Narrows, but rather in the lake waters adjacent to those areas. We'll treat in the Inlet Bay, south of the creek inlet and in the wide area of the Narrows east of the narrow portion. The ProcellaCOR will diffuse in the water in, and directly adjacent to, the treatment zones but modeling did not show that it will be carried by moving water.
- The impact on non-target plants was one of our main concerns. It does harm native milfoil. We did a plant survey throughout the lake last August and found native milfoil in the lake, but not near the treatment areas, so we don't expect there to be an impact on the native milfoil. Coontail is affected by ProcellaCOR but is typically impacted by treat rates above those that we will use. Real world experience of ProcellaCOR treatments in >200 lakes in the past 4 years show that coontail can show a range of impacts, from none at all to partial damage. The same real world experience shows that water lilies can show temporary distress but typically recover by the end of the season, with no long term impacts.
- I couldn't find any published info on the impact of ProcellaCOR on snails and would be interested to learn more if you can share what you have found. I did find a published study on the impact on juvenile freshwater mussels (which concluded treatments at the intended treat rates are safe) and you can find it at this link if you are interested - https://www.researchgate.net/publication/343932194_Evaluation_of_Juvenile_Freshwater_Mussel_Sensitivity_to_Multiple_Forms_of_Florpyrauxifen-Benzyl
- The toxicological studies that are the foundation of the federal approval and approvals in many states for ProcellaCOR have resulted in it carrying the safest rating for human consumption. I can aim you toward a Vermont state document that gives a good, easily understood discussion of the human impact if you are interested. It is also worth noting that the ProcellaCOR is released sub-surface and diffuses in the water column rather than sinking through it, so the concentration at the bottom should not be any greater than anywhere else in the water column.
- Options to ProcellaCOR were considered, including more established herbicides, but rejected by the PLA. There is an herbicide called SONAR that used to be the preferred herbicide for treating Eurasian Water Milfoil. It treats at a much higher treat rate than ProcellaCOR, resulting in the use of much more chemical, is not nearly as selective as ProcellaCOR in the plants impacted, and tended to be a temporary fix with EWM plants returning after a few years.

You, as one of our very active volunteer EWM divers, have seen first hand that the EWM is continuing to spread around the lake and that our volunteer and contract hand harvesting is not keeping up with the growth. The option of continuing to increase our spending on contract harvesting was not a sustainable long term approach so our only realistic options were to give up on controlling EWM and accept its spread across the lake or to treat with ProcellaCOR to regain control. Given the consequences of giving up, it seemed clear to the PLA board that the ProcellaCOR treatment was the best path forward.

This was a long note but I hope it helps to clarify some points for you. Happy to discuss further and hope to see you out on the lake again this year.

Bob Hauserman
Paradox Lake Association president

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From: [Glenn Sullivan](#)
To: [Ziemann, Aaron C \(APA\)](#)
Subject: Fwd: Outreach from theParadox Lake Association
Date: Wednesday, April 19, 2023 5:15:05 PM

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Aaron,

Please see the email below from Bob Hauserman in response to one of the letters.

Glenn Sullivan

Certified Lake Manager

Project Manager



M: 908-310-8775



solitudelakemanagement.com

----- Forwarded message -----

From: **Bob Hauserman** <bobhauserman17@gmail.com>
Date: Wed, Apr 19, 2023 at 4:21 PM
Subject: Outreach from theParadox Lake Association
To: <vickimast2539@gmail.com>
Cc: Glenn Sullivan <gsullivan@solitudelake.com>

Vicki,

My name is Bob Hauserman. I believe we met a number of years ago during a small group dinner at Sticks and Stones and I'm a neighbor of yours at the lake. My dock is in Crawford Cove. I'm also the president of the Paradox Lake Association.

I'm reaching out to you as a result of the APA sharing your feedback to them regarding the proposed use of ProcellaCOR to reduce the milfoil population in Paradox Lake. I am personally happy that you took the opportunity to express your concerns so they can be discussed and hopefully addressed. I understand your concern for the health of Paradox Lake. Every Paradox Lake Association board member was also concerned for the health of the lake when we started looking at ProcellaCOR as a potential milfoil treatment option. We all care deeply about maintaining the high quality of the lake water and its wildlife and this is also the primary mission for the PLA. However, after looking through the data that is available, and the real world experience from 4 years of use in over 200 lakes, we each became comfortable with the short and long term safety of the treatment.

The PLA has tried to be very open and communicative about our plans and the data available on ProcellaCOR. However we know that we may not have everyone's correct email address, not everyone receives each of our emails and newsletters and some are not able to attend our annual meetings. If you are interested, I'd be happy to meet with you to talk about the data that is available that demonstrates the safety of ProcellaCOR with regard to other aquatic plants, fish, aquatic invertebrates and mammals. Alternatively, I can get you links to the information as we have it available on the PLA website.

Please let me know which option works best for you and I look forward to discussing your concerns with you.

Thanks

Bob Hauserman
President, Paradox Lake Association

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From: [Paul Clarke](#)
To: [APA Regulatory Programs Comments](#)
Subject: Letter to the APA
Date: Monday, October 23, 2023 7:31:36 PM
Attachments: [ProcellaCOR Letter to APA.pdf](#)

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Mr. Ziemann,

Please read the attached letter to you and the APA. Thank you.

"The Greatest Medicine of all is teaching people how not to need it." Hippocrates

With our warm wishes,

Paul and Diane Clarke

parnconsulting@gmail.com
dianeclarke331@gmail.com

Paul: 518-281-9588
Diane: 518-424-6771
888-800-6434 fax and voice mail

From: [Janice](#)
To: [APA Regulatory Programs Comments](#)
Subject: Milfoil in Paradox Lake
Date: Sunday, October 22, 2023 1:49:03 PM

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Hi Aaron,

I am writing to you because I am a property owner on Paradox Lake. I have been involved in scouting and harvesting milfoil in the lake for a few years now. The milfoil has spread significantly. It is spreading to areas that didn't have milfoil in previous years and is much thicker in other areas where it can no longer be controlled by hand harvesting.

I encourage you to approve the use of ProcellaCor on the lake to help control the milfoil.

Thank you,
Janice Miller

Sent from my iPhone

From: [Edward Madlon](#)
To: [APA Regulatory Programs Comments](#)
Subject: Milfoil in Paradox Lake
Date: Sunday, October 22, 2023 5:51:10 PM

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Hi Aaron,

I am writing to you because I am a property owner on Paradox Lake. I have been involved in scouting and harvesting milfoil in the lake for a few years now. The milfoil has spread significantly. It is spreading to areas that didn't have milfoil in previous years and is much thicker in other areas where it can no longer be controlled by hand harvesting.

My grandparents purchased the cabin on Paradox Lake in 1965 and my sisters and I have been enjoying it ever since and now our kids are having kids and we truly hope Paradox Lake can stay the same beautiful lake for them going forward as it has been for us all these years.

I encourage you to approve the use of ProcellaCor on the lake to help control the milfoil.

Thank you,
Edward Madlon

From: [Diane Madlon-Kay](#)
To: [APA Regulatory Programs Comments](#)
Subject: Milfoil in Paradox Lake
Date: Monday, October 23, 2023 6:20:50 PM

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Dear Aaron Zieman,

I'm writing in reference to project number 2023-0036. I am a property owner on Paradox Lake and asking you to approve the use of ProcellaCOR next spring to help control the spread of milfoil there. I live in Minneapolis, and milfoil has been a major problem in many of the city lakes here for years. It is important to try to control the problem at Paradox Lake early, to maintain biodiversity in the lake and ensure the lake remains available for swimming.

Sincerely,
Diane Madlon-Kay

From: [Anne](#)
To: [APA Regulatory Programs Comments](#)
Subject: Milfoil
Date: Friday, March 10, 2023 4:04:52 PM

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Dear Mr. Ziemann,

As a Paradox Lake shore owner I have watched the manual picking of milfoil for years. It has not worked since the milfoil continues to spread, therefore I strongly approve of the application of whatever product is deemed necessary to stop the advance of milfoil.

Yours truly,
James J Gregory

[Sent from Yahoo Mail for iPad](#)

From: [Vicki Mast](#)
To: [APA Regulatory Programs Comments](#)
Subject: Millfoil APA project no. 2023-0036
Date: Monday, April 17, 2023 1:34:26 PM

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This is to notify you that I am 100% opposed to using chemicals to try and eradicate Milfoil in Paradox Lake. I have not seen any Toxicology reports stating no issues were found with any other lake vegetation much less fish and other wildlife living in the lake. I understand that there are those on Lake George that take issue also.

I live on the eastern end of the lake in your area of infestation. I have been hand harvesting floating millfoil off my waterfront front in increasing amounts over the last several years. It usually increases when the Company that the Association has hired has been harvesting. They do not do a good job of skimming the lake to catch broken pieces while harvesting. Please make sure my objections reach the appropriate people.

Vicki Mast
37 Adams Lane
Paradox, NY 12858

From: [Matthew Wood](#)
To: [APA Regulatory Programs Comments](#)
Subject: Paradox Lake - Aquatic Herbicide
Date: Friday, March 10, 2023 10:48:50 AM

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Hello,

I received a letter regarding the proposal to apply aquatic herbicide in the narrows of Paradox Lake and the inlet.

My wife and I are in favor of the project to prevent further spread of invasive milfoil in the lake.

Sincerely,
Matt

--

Matthew P. Wood, President
MetzWood Insurance
W: (518)392-5161 | C: (518)567-4943
www.metzwood.com

From: [Brown, W Langdon](#)
To: [APA Regulatory Programs Comments](#)
Subject: Paradox Lake Association Project # 2023-0036
Date: Tuesday, October 24, 2023 12:55:30 PM

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Attn. Aaron Ziemann

I am writing in support of Paradox Lake Association (PLA) Project No. 2023-0036 to apply ProcellaCOR within the Narrows and Inlet Bay of Paradox Lake.

As property owners and long-time volunteer spotters and harvesters, my wife and I strongly support PLA's efforts to manage Eurasian watermilfoil in our lake. For the last decade working with a lake manager, commercial harvesters, volunteer divers and snorkelers, hand harvesters and others from our community, we have been able to control the spread of this invasive plant. Unfortunately, milfoil has now spread beyond our ability to control. From conversations with neighbors on Lake Minerva and others, we are confident the herbicide will enable PLA to manage milfoil and continue our mission of protecting and preserving our lake for the thousands of residents and visitors who enjoy boating, fishing, and swimming for many years to come.

I urge the APA to approve PLA's application. Thank you for your consideration.

William Langdon Brown
253 Fraternaland Road, Paradox

Langdon Brown
wbrown2@albany.edu

From: [Nancy Murphy](#)
To: [APA Regulatory Programs Comments](#)
Subject: Paradox Lake Invasives - project reference number 2023-0036
Date: Thursday, October 19, 2023 11:09:23 AM

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Aaron Ziemann
Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

Dear Mr. Ziemann,

I am a property owner on Paradox Lake in the town of Schroon Lake NY and have been coming to this beautiful lake for over sixty years. The relentless spread of the invasive Eurasian Aquatic Milfoil has been very distressing. I was pleased to learn that our project for the application of aquatic herbicide ProcettaCOR EC is ready for final formal review and approval. I am in full support of this project and have seen the herbicide work well in Dutchess County NY.

The Paradox Lake Association has been extremely responsible in its investigation of this herbicide and has been exploring options for dealing with the milfoil infestation for years. They have explained the issue to landowners consistently, been transparent about information on the chemical herbicide and kept us abreast of the application process. The PLA has supported and manned the boat wash station, first at the Paradox campground and then on Route 74. The PLA has spent time and effort educating members to recognize and prevent introduction of the invasive species on our lake.

We have had a very active team of landowner volunteers who "mark", dive, and help harvest milfoil plants and have done so for many years now. We have hired Aqualogic for several years to dive in the particularly troublesome areas to dig the milfoil getting it at its roots. However, the invasive has steadily spread. Last year when we stopped harvesting milfoil at the Paradox Creek inlet to the lake so that the State could inspect the infestation, we noticed that the Eurasian milfoil became significantly worse last Fall and this Spring. I have now found several plants in our small bay on the Upper Lake this year, and in the past, it had been essentially trouble-free. As an occasional volunteer "marking" the milfoil for harvesting, I feel certain that our volunteers can no longer adequately manage nor get ahead of this invasive.

I feel very strongly that permission should be given to apply this herbicide. It is necessary to maintain the pristine nature of Paradox Lake to be enjoyed by all. I agree with the Paradox Lake Association that the project is critical to ensure we maintain the biodiversity in the lake, to ensure the lake remains available for boat navigation, fishing, water sports, and that the entire lake remains available for swimming. I would go so far as to recommend that the Adirondack Park Agency along with NYS prioritize and fund eradication of invasive species from the Adirondack Park lakes and ponds even more assertively than has been done in the past. I urge your approval of this Paradox Lake project (reference number 2023-0036).

Thank you.

Nancy T. Murphy
11 Linden Ct Millbrook, NY 12545

255 Fraternal Land Rd Paradox Lake, NY

h: 845-677-3440

c: 845-235-7274

ntmurphy@optonline.net

From: [Linda McClary](#)
To: [APA Regulatory Programs Comments](#)
Subject: Paradox Lake Support for Procella Cor EC
Date: Monday, October 23, 2023 10:02:32 AM

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Dear Aaron Ziemann,

I am writing in support of the use of Procella Cor EC at Paradox Lake. Paradox Lake Association members have worked diligently to eradicate the invasive Milfoil providing countless hours of volunteer work to try and address this issue. It has been discouraging with all of the efforts that have been made by the volunteers, the Milfoil continues to spread. I support the use of the herbicide to try and bring the Milfoil under control, Thank you for your support in this matter.

Linda McClary
203-733-6473
15 Idlewild Way
Paradox, NY 12858

From: [Kulwin, Clifford](#)
To: [APA Regulatory Programs Comments](#)
Cc: [Kulwin, Robin](#)
Subject: Paradox Lake
Date: Monday, October 23, 2023 10:29:02 AM

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TO: Aaron Ziemann
Adirondack Park Agency

Dear Mr. Ziemann:

My name is Clifford Kulwin. My wife, Robin Kulwin, and I live at 12 Idlewild Way in Paradox, NY, on Paradox Lake. I write in fervent support of the application of the aquatic herbicide ProcellaCOR EC as proposed by the Paradox Lake Association (PLA).

The PLA has expended significant funds and untold volunteer hours in an attempt to address substantively the milfoil issue. As you are no doubt aware, the results have been disappointing. I am excited about the prospect of ProcellaCOR EC having learned about it from those in the PLA who have studied the matter extensively. It truly seems the best means of curbing this dangerous invasive issue while remaining responsible stewards of the wonderful lake we are privileged to call home. I urge the APA to approve the application.

Sincerely,

Clifford Kulwin
973.809.4239

From: gretchensun2@gmail.com
To: [APA Regulatory Programs Comments](#)
Subject: Paradox Lake
Date: Sunday, October 22, 2023 6:20:18 AM

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Dear Aaron,

In regards to Paradox Lake, 2023-0036, I am very much in favor of using ProcellaCOR to help with our fight against milfoil. I have lived her all of my life and own 900 feet of lakefront. I have been a scout/harvester of milfoil for 11 years and am very aware that we are losing the battle against this invasive.

Please help us move forward – it's our last resort to save our lake!

Gretchen Sunderland
269 Fraternaland Road
Paradox, NY 12858

Sent from [Mail](#) for Windows

From: [Liz Reid](#)
To: [APA Regulatory Programs Comments](#)
Cc: ereid@thelmreidgroup.com
Subject: Paradox Lake-2023-0036
Date: Wednesday, October 25, 2023 7:34:02 AM

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Dear Aaron,

I am very much in favor of using ProcellaCOR in Paradox Lake (2023-0036) to help with our fight against milfoil.

I am a year-round resident and lake front owner and part of a 4-generation family that has been enjoying this lake since the early 60's. I have been a very active scout/harvester of milfoil since we found milfoil in our lake almost 15 years ago and we are losing the battle against this invasive with just harvesting.

Please approve the permit to treat our lake.

Sincerely,

Liz Reid
46 Reid Way
PO Box 43
Severance, NY 12872

From: [Anthony Petrongolo](#)
To: [APA Regulatory Programs Comments](#)
Subject: Permit Application #2023-0036
Date: Wednesday, October 18, 2023 3:06:12 PM

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Aaron, we would like to express our enthusiastic support for the above application. A cursory look at the supportive materials provided by the applicant will indicate very clearly that, despite steadily increasing and expensive efforts at hand harvesting to control Eurasian milfoil, herbicide spraying will be necessary to have any chance of success. The PLA is losing ground in this effort and will continue to do so unless this application is expeditiously approved. Thank you for your consideration.

Tony and Edith Petrongolo
Paradox Lake shorefront owners

From: [Michael Murphy](#)
To: [APA Regulatory Programs Comments](#)
Subject: ProcellaCOR EC application on Paradox Lake, town of Schroon.
Date: Friday, October 20, 2023 9:59:30 AM

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Dear Mr. Ziemann,

As a long time property owner on Paradox Lake, I am writing to urge you to approve the application to use ProcellaCOR EC on the invasive Eurasian Millfoil which is spreading in our beautiful lake. While the Paradox Lake Association has been working diligently to try to control the milfoil's spread through volunteer spotting and pulling programs, the initiation of a lake steward program, and hiring Aqualogic, a company that uses scuba divers to pull the plants, the problem is getting worse. I fear that this once pristine lake will be clogged with large mats of milfoil. Please help us save Paradox Lake!

Sincerely,

Michael Murphy
11 Linden Court
Millbrook, NY 12545
845-797-2464
Sent from my iPhone

From: [LINDA MARSHALL](#)
To: [APA Regulatory Programs Comments](#)
Cc: [Bob Marshall](#)
Subject: ProcellaCOR EC- Paradox Lake and Bubblers
Date: Tuesday, October 24, 2023 2:11:47 PM

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Dear Mr. Ziemann,

I am writing with concerns regarding the health of Paradox Lake.

First, the lakeshore has experienced a proliferation of bubblers - making much of the shoreline ice unsafe for passage despite way-below-freezing winter temperatures. For human and animal safety, the bubbler fields need to be isolated so no one falls into the water and drowns.

Also, what is the effect on winter habitat of aquatic life? To my knowledge, that has not been fully studied. I urge the APA to look into this.

Second, I wonder if applying ProcellaCOR is as safe as it's been touted. What are the dangers? What are the effects on non-target flora and fauna? It is my understanding that the nearby Schroon Lake has decided not to use it. I question use of this material on Paradox.

I believe both the use of ProcellaCOR and additional bubblers should be studied more thoroughly before being given the go-ahead. I would recommend that someone from the APA take a drive down Shore Road in Severance during mid-winter and observe the changes bubblers have wrought.

Surely, this is not "forever wild."

Linda Marshall
DJBR, LLC
PO Box 133
Severance, NY 12872

www.lindamarshall.com

From: [Diane Clarke](#)
To: [APA Regulatory Programs Comments](#)
Subject: ProcellaCor on Paradox Lake
Date: Friday, October 20, 2023 7:05:52 PM

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Re: Project reference number 2023-0036

Please, Ladies and Gentlemen:

It is very important to us as permanent year round residents of Paradox Lake, NY, to have a voice in the decision to protect our lake. It is critical that we voice our concern that the next step, ProcellaCor, is necessary to protect our ability to use our beautiful lake as we have for at least the previous 3 generations I have lived through. We have been able to live here, enjoy navigating waters for boating, canoeing, fishing, kayaking, swimming and drinking.

We have been fighting off the spread of invasive Eurasian Water Milfoil with volunteer diving, pulling, marking, and then paying for specialized professional diving and vacuuming assistance harvesting at great expense. This battle has been over decades. We have lost the battle and we need scientific help before it is too late, as we have seen happen in other lakes. I personally have also invested many many hours fundraising for the PLA (Paradox Lake Association) to support the cost of these less effective efforts. It has become abundantly clear these hands-on efforts are a losing battle against the spread of EWM. The rising waters during this past summer of over 28 inches of rain in July and August of 2023 have made the fragments spread even higher, become thicker. It's all over our submerged beaches now! We need the planned use of the chemical herbicide ProcellaCOR. The herbicide has been used on many lakes, including 30 in NY and 100 across the Northeast. It's safe and effective. We need help through using science.

Thank you for your serious consideration!

--

Diane K. Clarke, RN
362 Fraternaland Road
Paradox, New York 12858
518-424-6771
Dianeclarke331@gmail.com

From: [Janet VanDuyn](#)
To: [APA Regulatory Programs Comments](#)
Subject: Project #2023-0036
Date: Thursday, October 19, 2023 8:09:13 AM

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Dear Mr. Ziemann,

I am emailing you to give feedback on the Paradox Lake Association plan to use ProcellaCOR in our lake to combat milfoil invasion. This is APA Project #2023-0036.

We have owned a vacation home on Paradox Lake for almost 25 years, and value our lake's water quality and native environment very highly.

I believe our Association has done a great job researching available means to eliminate the milfoil that has invaded the lake, and while use of chemicals in a wild area is not to be done lightly, in this case I think it is the right solution. Less aggressive means of removing the milfoil have simply not been effective. We need to somehow get ahead of the problem, and it seems the use of ProcellaCOR is the way to do it.

Thanks for your oversight of this project.

Respectfully,
Jan VanDuyn

Jan VanDuyn

President
(585)544-6644



Celtic Saint of the Day St. Tuda of Lindesfarne

From: jeff.dobbs@verizon.net
To: [APA Regulatory Programs Comments](#)
Subject: Project 2023-0036
Date: Wednesday, October 18, 2023 9:15:51 AM

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Aaron Ziemann
APA
ProcellaCOR Plan For Paradox Lake

I would like to add my voice to the supporters of the Paradox Lake request to use ProcellaCOR for a three year cycle beginning Spring, 2024.

I'm a land owner on Paradox Lake who is currently in the process of investing in Paradox by building a house for future generations of my family. The Dobbs Family has been a part of the Paradox Lake community for generations and we look forward to future generations enjoying the beauty of Paradox and creating the wonderful memories of the Lake our current generation has.

However, to keep the Lake viable for future generations, Paradox Lake needs help fighting off eurasian milfoil currently invading our waters. ProcellaCOR is our best weapon in this fight and I urge you and the APA to support this initiative and help us eradicate the current incursion we're fighting.

I believe we're at a juncture in this fight where our efforts will help future generations and we can live up to the quote 'Societies become great when old men and women plant trees in whose shade they will never sit.' I believe we're planting those trees throughout the Adirondacks and supporting this decision, in conjunction to the other mitigation steps we're taking, will be a significant step forward.

Regards,

Jeff Dobbs & Family

From: [Rosemary Pugliese](#)
To: [APA Regulatory Programs Comments](#)
Subject: Project 2023-0036
Date: Monday, October 23, 2023 9:53:51 PM

[Some people who received this message don't often get email from rosemarypugliese0@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Hello,

My family are property owners on Paradox Lake. Several of us have helped in efforts to scout for and harvest milfoil in the lake for a few years. The milfoil has spread significantly. It is spreading to areas that didn't have milfoil in previous years and is much thicker in other areas where it can no longer be controlled by hand harvesting. Please approve the use of ProcellaCor or there will be no stopping the milfoil progression.

Respectfully,

Rosemary Pugliese (Madlon Family owners)

Sent from my iPhone

From: [Brian Smith](#)
To: [APA Regulatory Programs Comments](#)
Subject: Project 2023-0036
Date: Saturday, October 21, 2023 10:41:27 AM

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I own property on Paradox Lake, and I strongly support the project to address the milfoil problem.

Regards,
Brian D Smith

29 Ledge Rd, Severance
268 Ivy Place, Ridgewood, NJ 07450

--

Brian Smith
201 233 2384

From: [Kelley Head](#)
To: [APA Regulatory Programs Comments](#)
Subject: PROJECT 2023-0036
Date: Wednesday, October 25, 2023 11:20:40 AM

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Dear Aaron,

I am writing on behalf of the Paradox Lake Association's use of herbicide in Paradox Lake. While there is always a concern with introducing something of this nature into a natural habitat, there comes a time when drastic measures are needed. My family has owned Lake Paradox Club and land all along the south shore of Paradox Lake for over 100 years. While our shoreline has changed little in the past 100 years, the water and population on the lake has. We are growing concerned that the milfoil explosion in our Lake will change the recreational use my family and guests have grown up loving. We are in full support of trying to gain control of this problem, so that future generations will also be able to enjoy this lake. Lack of a beach will also affect our revenue and that will impact the local economy as well if we cannot have guests enjoy the lake we have built a generational business on.

Best,
Kelley Waleski
Owner, Lake Paradox Club

[Sent from Yahoo Mail on Android](#)

From: tjurek@nycap.rr.com
To: [APA Regulatory Programs Comments](#)
Cc: ["Paradox Lake Association"](#)
Subject: project reference number 2023-0036.
Date: Wednesday, October 18, 2023 9:08:28 AM

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GM

I am in full support of the proposed 3 year treatment plan of Eurasian Watermifoil with ProcellaCOR in Paradox Lake.

I was one of the original volunteers in the milfoil control/eradication efforts of the Paradox Lake association almost 20 years ago. Despite all of the efforts and hard work of many volunteers over the past 20+/- years, this past summer, the milfoil invasion appears to be the worst that has been. Most disturbing is the exponential growth in the creek and Inlet Bay.

In anticipation of final approval of this project, I'd like to thank you for your attention to this most important issue facing Paradox Lake.

Respectfully
Thomas J Jurek
Property Owner Paradox, NY

From: [Sue Alleman](#)
To: [APA Regulatory Programs Comments](#)
Subject: Support for 2023-0036
Date: Wednesday, October 25, 2023 11:01:49 AM

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Dear Mr. Ziemann,

We are homeowners on Paradox Lake and are in support of the herbicide project identified above. Its critical to the longevity of the lake and overall ecosystem. Failure to implement will have a negative impact on the lake water. We look forward to implementing this herbicide plan.

Thank you

Sue & Mark Alleman

[Sent from Yahoo Mail for iPhone](#)

From: [Julianne Kapner](#)
To: [APA Regulatory Programs Comments](#)
Subject: Support for APA Approval of ProcellaCOR on Paradox Lake
Date: Wednesday, October 18, 2023 1:29:50 PM

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Re: reference number [2023-0036](#)

Dear Mr. Ziemann,

My name is Julianne Kapner. I am a fourth-generation resident at 200 Shore Road, Severence, NY; while I do not own the property (the owner is my grandfather), I wanted to write to voice my support of the ProcellaCOR project on Paradox Lake. My understanding is that this project will play a crucial role in preventing Eurasian Milfoil from making the lake unusable for swimming, boating, and other recreation, and protect the biodiversity that makes our lake so spiritually renewing. My grandfather, my father, and I (as well as our siblings) grew up at Paradox Lake, learning to swim, boat, fish in its waters, and finding refuge in the thriving natural environment. Now in my late 20s, I hope that the fifth generation of Kapners can have those same opportunities. I encourage APA to approve the plan by the Paradox Lake Association so that the next generation can have those opportunities, and so that the rest of us can have the joy of watching.

Thank you,

Julianne Kapner

From: [Susan Brown](#)
To: [APA Regulatory Programs Comments](#)
Subject: Support for Paradox Lake Association Project No. 2023-0036
Date: Tuesday, October 24, 2023 10:51:18 AM

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Attn. Aaron Ziemann

I am writing in support of Paradox Lake Association (PLA) Project No. 2023-0036 to apply ProcellaCOR within the Narrows and Inlet Bay of Paradox Lake.

As property owners and long-time volunteer spotters and harvesters, my husband and I strongly support PLA's efforts to manage Eurasian watermilfoil in our lake. For many years, PLA has been able to control the spread of this invasive plant through volunteer and commercial hand harvesting. But milfoil has proliferated during the past two year beyond our ability to control its spread. We are confident the herbicide will enable PLA to manage milfoil and continue our mission of protecting and preserving our lake for the thousands of residents and visitors who enjoy boating, fishing, and swimming for many years to come.

I urge the APA to approve PLA's application. Thank you for your consideration.

Susan Brown
253 Fraternaland Road, Paradox

From: coachbobh@verizon.net
To: [APA Regulatory Programs Comments](#)
Subject: Support for Paradox Lake ProcellaCOR treatment permit - APA Project # 2023-0036
Date: Friday, October 20, 2023 2:46:35 PM

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To Aaron Ziemann,

I am writing to encourage the APA to approve the permit for the application of the herbicide ProcellaCOR EC on Paradox Lake, APA Project # 2023-0036. The Paradox Lake Association has been battling Eurasian Watermilfoil in Paradox Lake for many years and has relied solely on hand harvesting. We have a robust scouting program to identify EWM plants around the lake and use volunteer and contract harvesters to remove the plants. Our efforts have increased each year as the EWM has spread around the lake. The Paradox Lake Association has spent ~\$190,000 on hand harvesting from 2019 to 2023, with much of that effort spent in the areas of the most dense growth. The current levels of spending are not sustainable for the association membership.

There are several areas on the lake where we have intensively hand harvested and have made little progress in reducing the EWM population. These include the two areas proposed for treatment with ProcellaCOR EC in the APA Project proposal, the Inlet Bay and the Narrows. Despite our efforts, the density of the EWM growth has actually continued to increase over time in these areas. These areas are also generating a significant number of fragments each year that drift on the wind currents and settle to create new plants in other parts of the lake. We need to eliminate the EWM from these areas to stop the fragmentation and we have concluded that the only way we will get these areas back under control is through the use of the herbicide.

The APA approval of our permit a critical step in our work to prevent the EWM from overrunning the entire lake and the associated reduction in biodiversity and recreational opportunities in the lake.

Thanks you,

Bob Hauserman
President, Paradox Lake Association

From: dougdavis5555@yahoo.com
To: [APA Regulatory Programs Comments](#)
Cc: paradoxlakeassociation@gmail.com
Subject: Support the Use of Herbicide ProcellaCOR in Paradox Lake
Date: Wednesday, October 18, 2023 6:23:39 AM

Some people who received this message don't often get email from dougdavis5555@yahoo.com. [Learn why this is important](#)

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Dear Aaron Ziemann,

My wife and I are owners on Paradox Lake. We support the treatment of Eurasian Watermilfoil in the Narrows and Inlet Bay with the herbicide ProcellaCOR. The project reference number is 2023-0036.

We believe the project is critical to maintain the biodiversity in the lake, to maintain availability for boat and kayak navigation, to maintain the entire lake for swimming, and to maintain the attractiveness of our property on Paradox Lake.

Thank you,
Doug and Candy Davis

From: [Scott Bieker](#)
To: [APA Regulatory Programs Comments](#)
Subject: We support ProcellaCOR for Paradox Lake: project reference number 2023-0036
Date: Wednesday, October 18, 2023 10:51:20 AM

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Good morning Aaron -

Thank you for sharing the diagram from the APA regarding where ProcellaCOR will be used on Paradox Lake. Our lake has been diligently fighting Eurasian Milfoil since we purchased our property 17 years ago, and probably before that.

We are glad to support the use of an approved herbicide like ProcellaCOR in order to keep Paradox Lake as pristine as it can be.

Best regards,

Scott

--

Scott Bieker
sbieker@gmail.com

917-434-9121 

[LinkedIn](#)

From: [Bruce Figueroa](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Project No. 2023-0036
Date: Friday, October 27, 2023 5:37:15 PM

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Dear Aaron Ziemann,

I am writing to express my support for the application of the aquatic herbicide ProcellaCOR EC as proposed by the Paradox Lake Association. As a member of a family that has been on the lake since 1888 we are committed to the health of the lake and see how we need additional assistance and tools to fight the Milfoil invasion.

Thank you for your consideration,

Bruce and Elizabeth Figueroa
701 NYS Route 74
Paradox Lake, NY

Sent from Bruce Figueroa's iPad

From: deputydirector@protectadks.org
To: [APA Regulatory Programs Comments](#)
Subject: Public comment letter re ProcellaCor (Paradox Lake)
Date: Wednesday, October 25, 2023 5:49:37 PM
Attachments: [231025-APA-ProcellaCor-Paradox Lake.pdf](#)

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Dear Aaron,
Please see attached public comment letter regarding the Paradox Lake proposal for application of ProcellaCOR.
Thank you,
Claudia

Claudia K. Braymer
Deputy Director
Protect the Adirondacks
PO Box 48
North Creek, NY 12853
Office 518.251.2700
Cell 703.937.7163
Office Address: 105 Oven Mountain Road, Johnsburg NY
deputydirector@protectadks.org
www.protectadks.org
Follow Protect the Adirondacks on Facebook
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Board of Directors

October 25, 2023

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Chair

Aaron Ziemann
Adirondack Park Agency
PO Box 99 Route 86
Ray Brook NY 12977

James McMartin Long
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Vice-Chairs

Barbara Rottier
Secretary

**RE: Public Comments on Application of the aquatic herbicide
ProcellaCOR EC in Paradox Lake to control Eurasian watermilfoil**

David Quinn
Treasurer

Dear Aaron:

Nancy Bernstein
John Caffry
Andy Coney
Dean Cook
James C. Dawson
Lorraine Duvall
Robert Glennon
Roger Gray
Evelyn Greene
Sidney Harring
Dale Jeffers
Patricia Morrison
John Nemjo
Peter O'Shea
Philip Terrie
Chris Walsh

As we have stated previously, Protect the Adirondacks has a number of concerns about the use of ProcellaCOR treatment on Adirondack lakes. The most recent proposal is for Paradox Lake. The purpose of this project is to reduce the presence of the aquatic invasive plant Eurasian watermilfoil (*Myriophyllum spicatum*). We continue to believe that this proposed application of ProcellaCOR is premature, its impacts have not been fully assessed, and the applicants do not have long-term planning in place for future management of Eurasian watermilfoil (EWM).

Staff

Peter Bauer
Executive Director

The presence of EWM was first reported in 2008 and has been managed with hand harvesting since that time. Of all the treatment methods, hand-harvesting has proven the most successful over the years, especially by utilizing large, trained diving crews. The high cost and intensive labor involved are the main drawbacks of hand-harvesting, but it's highly effective at reducing EWM sites and limits disturbance of native aquatic plant populations. Unfortunately, EWM is an invasive plant that will never be fully eradicated from our waters. Once a lake is infested, the most successful efforts have strived to contain it with regular management. This is the reality on Paradox Lake, just as it is in many Adirondack lakes. EWM control with active management is a fact of life that must be continued year after year.

Claudia K. Braymer, Esq.
Deputy Director

Christopher Amato, Esq.
**Conservation Director
and Counsel**

Protect the Adirondacks

PO Box 48, North Creek, NY 12853 518.251.2700

www.protectadks.org info@protectadks.org

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Paradox Lake has limited growth of EWM: The application materials indicate that EWM is “present throughout Paradox Lake”, but the materials also state that there is “limited growth of [EWM] in Paradox Lake” and that due to the low level of infestation of EWM, “the impact of [EWM] on native species is limited”. While it is possible that EWM will continue to grow if left completely unmanaged, EWM was successfully reduced as a result of regular hand harvesting. According to the materials, 2023 is only the second year of a three-year intensive effort to control EWM. In 2022, there was “significant progress” with hand harvesting of EWM. The results of the 2023 hand harvesting season should be provided to APA if they have not already been submitted. It’s unclear why the use of ProcellaCor is being planned now before the 3-year project is completed and fully assessed.

Minerva Lake Experience: The Adirondack Park Agency (APA) previously permitted the use of ProcellaCOR in Minerva Lake, in southern Essex County. In Minerva Lake only part of the lake was proposed for treatment but the chemical spread to the whole lake as the sequestration of the treatment area failed.

Chautauqua Lake Experience: ProcellaCOR was also used in Chautauqua Lake. The Chautauqua-Conewango Consortium assessment of the 2020 treatment states: “The June 29, 2020 application of ProcellaCOR EC to 86.4 acres of Chautauqua Lake was conducted by Solitude Lake Management. The third-party monitoring report (Report) was submitted by Princeton Hydro, LLC and made public on February 3, 2021. In this Report, an important conclusion was that the reduction of the target species, Eurasian watermilfoil, from the 2020 treatments was **not significant**. Thus, the treatment program was not successful in achieving one of its main goals. The failure to significantly reduce the biomass of this species raises the question of the efficacy and cost effectiveness of the use of ProcellaCOR EC in the future.”

Lake Luzerne Experience: We understand that ProcellaCOR was approved for use in Lake Luzerne and that the application of ProcellaCOR was undertaken this summer. Information about the efficacy of the application, as well as post-treatment findings of impacts to non-target aquatic plants, fish and other aquatic species, from the treatment of that lake should be provided to APA for review prior to approval for use in additional lakes in the Adirondacks.

Questions that merit greater examination: The proposed use of ProcellaCOR to treat EWM on 60 acres of Paradox Lake raises many questions. These include:

- The aquatic plant diversity of the lake is relatively high. Impacts to non-target plants have been reported in recent treatments in other lakes and ponds. The proposal for use of ProcellaCOR has not provided adequate information about the impacts on non-target aquatic plants.
- The species richness of the lake is quite high, with hundreds of phytoplankton, fish zooplankton, and benthic invertebrates. The proposal for use of ProcellaCOR has not provided any pre-and post-treatment findings for macrophytes, algae, fish,

benthic invertebrates or zooplankton native to Adirondack lakes. Much more information is needed to assess these impacts.

- The historic information about hand-harvesting treatments is inadequate. There is little information on annual hand-harvesting efforts, costs, plants/quantities harvested, or anything to evaluate the efficacy of these efforts.
- It appears from the application that chemical treatments are envisioned in the future as a means for controlling EWM (e.g., 60 acres in 2023 and 40 acres in 2024). There is inadequate information in the application about impacts from chemical treatments undertaken on a regular basis into the future. We oppose ongoing use of ProcellaCOR as a management technique.

Questions merit full examination in an official APA Adjudicatory Public Hearing: The APA ordered and conducted a formal adjudicatory hearing on the proposed use of the aquatic herbicide Sonar (SeaPro) by the Lake George Park Commission two decades ago, and the APA Board voted down the project in January 2003 based upon information elicited during that hearing. ProcellaCOR is less proven than Sonar was at time. Though the APA has refused to consider any formal adjudicatory hearings for the last 12 years, this project merits a high level of public scrutiny, opportunity for independent expert testimony and cross-examination, and public involvement. The APA's refusal to hold formal adjudicatory public hearings on major projects over the last dozen years has been an unfortunate miscarriage of its regulatory responsibility and shows a disturbing hubris in its regulatory review.

Without the benefit of fully developed record that would be produced during a formal adjudicatory hearing on the proposal, Protect the Adirondacks is opposed to the approval of any proposals for the application for ProcellaCOR treatment on Paradox Lake, or any Adirondack lake. The use of ProcellaCOR must be fully evaluated in an adjudicatory public hearing for the benefit of public understanding of its risks, utility and effectiveness.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to make these public comments.

Sincerely,



Claudia Braymer,
Deputy Director

From: [Brenda Borquist](#)
To: [APA Regulatory Programs Comments](#)
Subject: Re: Paradox Lake project 2023-0036
Date: Thursday, October 26, 2023 1:03:41 PM

Some people who received this message don't often get email from brendquist@gmail.com. [Learn why this is important](#)

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On Thu, Oct 26, 2023 at 12:59 PM Brenda Borquist <brendquist@gmail.com> wrote:

Dear Aaron Ziemann,

I support the application of the herbicide Procellacor to help control Eurasian Watermillfoil in Paradox Lake. I agree with the PLA that it is paramount to protect and maintain the biodiversity of these waters.

Swimming, boating and fishing are recreational activities that provide for people relaxation, feelings of goodwill, and appreciation for the natural beauty of the surroundings, as well as the clean, clear water. It is essential that we do everything we can to keep our lake in good shape.

Thank you for this opportunity to express my support of this project that will allow me and my family to continue to love, respect, and use these waters as we have for the last forty years.

Sincerely,

Brenda Borquist
9 Pelsinn, CRT PO Box 17
Severence, NY 12872