From:	Barb
To:	APA Regulatory Programs Comments
Subject:	Adirondack Park Invasive Plant Program (APIPP)
Date:	Saturday, March 12, 2022 5:19:06 PM

Dear APA,

I am in support of using Procella COR as a herbicide treatment for the eradication of Eurasian Milfoil in Lake George and other lakes in the Adirondack Park.

Regards,
Barb Kearney
200 Blue Bay Road
Chestertown, NY 12817
215.219.6769

Loon Lake Park District Board Member

ADIRONDACK COUNCIL
PRESERVING WATER, AIR AND WILDLANDS

March 31, 2022

Leigh Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
(Via Electronic Submission)

RE: Do Not Support the Application of ProcellaCOR in Sheep Meadow & Blairs Bay in Lake George, P2022-004 and P2022-0003

Dear Mr. Walrath,

On behalf of the Adirondack Council, I would like to thank you for the opportunity to provide comments on the Application of ProcellaCOR EC in Sheep Meadow and Blairs Bay in Lake George, P2022-003 and P2022-0004. In reviewing the permits for the two application sites, the Council does not support the herbicide applications at this time due to lack of long-term monitoring in northeastern waterbodies.

While the Council appreciates the intent to test this herbicide in small plots in Lake George, we believe that the applicant and the Adirondack Park Agency (APA) must first look to understand what, if any, impacts have or will occur in Minerva Lake, beyond two years, before looking to apply the chemical in other Adirondack water bodies. Minerva Lake is, in essence, a test case. Lake George is seen as a leader in its water resource management efforts, and many partners across the Park are paying close attention to these permits. We are at an important moment in time where the Agency has the ability to gather more data to understand what the longer-term impacts of this newer herbicide may be. If, in a few years, data confirms the low impact nature of this chemical treatment, then the Council would re-examine supporting such a treatment. Until then, we simply do not believe enough is known definitively.

Background
Florpyrauxifen-benzyl, commonly referred to as ProcellaCOR EC, is a chemical treatment used to manage aquatic invasive plant species, like Variable-leaf Milfoil (VLM) and Eurasian Watermilfoil (EWM). The chemical is an arylpicolinate, a new class of plant growth hormones called synthetic auxins, that has been engineered to be absorbed by specific species. It differs from other herbicides because it causes the plant to undergo an accelerated rate of growth by elongating a plant's cells and eventually kills the plant rather than more traditional herbicides that poison a plant. ProcellaCOR was registered by the US Environmental Protection Agency (EPA) in 2018 as a Group 4 herbicide; it was registered by New York State as a "Restricted Use" pesticide in 2019 and is slotted for renewal at the end of 2022.

Process
The proposed treatments sites are located in Blairs Bay (4.0 acres, lake depth of 10 feet) and Sheep Meadow Bay (3.6 acres, lake depth of 14 feet). The herbicide would be applied one day (between May 17 and June 30, 2022) at less than 10 parts per billion (ppb) by SOLitude Lake Management. Following application, water samples will be collected at three intervals within the first day (1, 12 and 24 hours) and then 3 and 7 days post-treatment. It is expected that the concentration will fall below 1 ppb on the 7th day, but that will be confirmed by sampling results. If not, additional monitoring will be required until that dilution threshold is achieved. Livestock watering and irrigation cannot occur until the herbicide concentration reaches below 1 ppb.

According to permit materials, the herbicide will likely be undetectable 2-3 days after application, but the water quality sampling is not expected to be completed until 10 days after application. In addition, the application outlines that a "qualitative survey will be conducted by SOLitude Lake Management to assess efficacy of the treatment, and impacts to non-target species" 3-4 weeks post treatment.

About 4.77 gallons of the herbicide will be combined with water and injected into the test site below the water's surface. The dilution zone for Sheep Meadow Bay will be about 40 acres and Blairs Bay will be about 60 acres.

Previous Management
Lake George, with a surface area of 28,000+ acres and a mean depth of 70 feet, is an important Adirondack waterbody given its ecological, economic, recreational and intrinsic values. The Council commends the Lake George Park Commission's efforts to manage EWM for over three decades and over 200 milfoil sites, 175 of which were cleared by divers via hand harvesting. Tens of sites have also been responsive to benthic barrier management efforts.

Concerns
While the Council understands that EWM harms the ecology and economy of a waterbody, we do not believe that applying a new herbicide where the long-term impacts are unknown is the right course of action at this time. More science and longer-term monitoring of ProcellaCOR is needed to understand how the herbicide will impact native plant, fish, invertebrate, etc., species in northeastern waters. The herbicide has been increasing in popularity across the northeast, including over 50 locations in New Hampshire, as well as several sites in Vermont and New York, since it was registered with the EPA in 2018. This provides a unique opportunity to look at how the ecology and hydrology of those waterbodies respond to the treatment <u>before</u> widespread requests and application occurs in the Adirondack Park.

The Council's concerns are outlined below:

1. <u>No Management in the Bay for 4 and 7 Years</u>: According to the 2013 Lake George Integrated Aquatic Plant Management Program, the program had a demonstrated record of success treating EWM through hand harvesting and benthic barriers. However, on page 169 of the application, EWM Harvest Data shows that no harvesting occurred after 2017 for Blairs Bay and not after 2014 in Sheep Meadow Bay Harvest.

   We encourage the Agency to not approve this permit until more monitoring in Minerva Lake can be completed. In the meantime, non-chemical treatments should be recommenced in both bays to determine how the EWM beds respond to hand harvest or benthic barriers management.

2. Minerva Lake Monitoring: According to the Minerva Lake permit (P2020-0044), "The post treatment monitoring of herbicide residue concentrations and of the plant community, and the reporting of activities and conditions surrounding the treatment, will allow the Agency to understand if the project occurred as proposed. The reporting will also allow a post treatment impact assessment of a value 1 wetland." The outcomes of this monitoring should be considered before further applications are conducted, as well as the results being made available for public access and review.

3. Potential Impacts to Rare Native Plant Species and Organisms: It is unclear what the impacts to more sensitive plant species will be in the treatment zones, including the following:
    a. Sheep Meadow Bay: Large-spored Quillwort (*Isoetes lacustris*) - *NY rare native plant*
    b. Blairs Bay: Alternateflower watermilfoil *(Myriophyllum alterniflorum) – NY Threatened native plant;* Large-spored Quillwort (*Isoetes lacustris*)

    Additionally, 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(s) in Sheep Meadow Bay and Blairs Bay may extend to other areas of the lake, affecting the native populations of milfoil found in Lake George, such as Northern Watermilfoil (Myriophyllum sibiricum) and Leafless Watermilfoil (Myriophyllum tenellum). 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.

4. Circulation of ProcellaCOR and Sampling through the Water Column: According to the Supplemental Information Request (SIR) for Sheep Meadow Bay, a composite water sample will not be collected. Rather, samples will 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, which is not consistent with circulation predictions modeled by the Jefferson Project.

5. Endocrine Disruptor: Although the USEPA stated in its final registration decision that the impacts of the herbicide on public health "appear to be minimal," the European Food Safety Administration declined to approve the herbicide's application on grounds that the endocrine-disrupting potential of the herbicide could not be ruled out. Specifically, the European studies reported reduced ovary weights and mammary gland tumors in the test subjects and suggested that higher dosages may be needed to establish definitively that there are no second-generation toxicity impacts of the active chemical in ProcellaCOR, florpyrauxifen-benzyl.

6. Nutrient Loading & HABs: The project materials do not include an assessment of phytoplankton, nor any mention of how phytoplankton will be monitored. Given the presence of HABs in Lake George, including two last year, the application should address if and how the application of ProcellaCOR could increase the likelihood of a HAB(s) due to impacts from phytoplankton or nutrient loading as a result of EWM die off.

7. Persistence of Degradates: One of ProcellaCOR's major selling points is its rapid degradation in the water column, which seems to rely primarily on a photolytic process. However, the labeling of this product suggests that the major degradates of florpyrauxifen-benzyl, which are expected to have the same or lesser toxicity than the parent compound, may persist up to 111 days in the environment (assumedly under conditions where photodegradation is slowed). Little is known about the fate of these degradates, therefore the potential harm caused by the persistence of these compounds for an extended period in the environment is unknown and raises concern.

Questions

Early research indicates that ProcellaCOR is successful in managing invasive aquatic plant species, but a lack of existing research on the subject leaves gaps that should be considered before determining the suitability of ProcellaCOR for widespread application. The concerns detailed below present good opportunities for further study into this subject:

- Will ProcellaCOR concentrations appear in surface sediments following applications?
- Will ProcellaCOR concentrations be tested during periods of lake-wide senescence or turnover?
- Will aquatic plant assemblages at application sites significantly differ across time from nearby, un-treated sites?
- Could limited dissolved oxygen availability and nutrient loading due to decomposition of target plants create anoxic conditions that increase the likelihood of algal blooms?
- Will continued applications of ProcellaCOR be as effective in treatment over time, or will hybridized varieties of invasive aquatic plant species resistant to the herbicide emerge?
- Will testing (including long-term monitoring) be conducted on impacts of ProcellaCOR on more sensitive species versus "representative species?"
- What are the potential food web impacts (including to phytoplankton and zooplankton)?

Consistency with APA Regulations

The application of an herbicide in a wetland within the Adirondack Park is a regulated activity pursuant to 9 NYCRR 578 and a permit must be obtained. Section 578(n)(2)(i) outlines that regulated activities include, "whether or not within wetland boundaries: any form of pollution, including installing a septic tank or sewer outfall, discharging wastewater treatment effluent or other liquid wastes into or so as to drain into a freshwater wetland."

In addition, according to § 578.4, wetlands have five outlined general values pertaining to flood damage and storm water to control, wildlife habitat, protection of water resources and valuable watersheds through pollution treatment or sediment control, recreation, and other values, like scientific research, open space, etc. Recognizing these values, wetlands are then assigned a value rating based on factors and characteristics outlined in §578.5. Neither of the permit applications address the type or value of the wetlands that will or could be impacted by this application. As the legal criteria warranting this regulatory review, this information should be included for public consideration within the project materials.

Furthermore, § 578.9 of 9 NYCRR 578 states that "in its review of wetlands projects pursuant to this Part the agency will consider the relative values of wetlands set forth in section 578.5 of this Part, as well as any economic, social or other benefits to be derived from the activity proposed. Such benefits may compel a departure from the general guidelines of this Part, in which case the agency shall document the specific benefits compelling such departure." We do not see this analysis included in the permit application. This information should also be included for public review.

Request for Public Meeting
Given the growing popularity of ProcellaCOR in New York and the interest it is garnering by Adirondack communities to address persistent EWM and VLM beds, the Adirondack Park Agency should host a public meeting to share information on the herbicide and to present how long range science will be utilized to inform the Agency's issuance of permits for this herbicide.

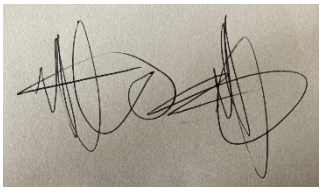
VISION 2050
One of the critical recommendations of the VISION 2050 reports is that the APA be a leader of setting the research agenda for the Adirondack, as captured in the text below:

> There is much to monitor and research in the Adirondack Park. Ensuring that it is done properly will require a coordinated effort. A state agency like a reimagined Adirondack Park Agency (APA) […] should facilitate the discussions needed among the many stakeholders to set the research agenda. This entails determining which subjects are most important to gather information about, and, which questions most need answers. The Adirondack Park Agency or other state agency would be best able to determine what research is needed to answer the policy and management questions they face. An example of a question on such an agenda would be, "What are the best ways to eradicate hemlock woolly adelgid without using pesticides?" The answer to that research would then be applied directly to management decisions.

In recognizing that more science and monitoring is needed to understand the long-term impacts ProcellaCOR may have on Adirondack waters, it presents itself as an important reminder and opportunity for the Agency to begin establishing how it can develop, respond to, and monitor for important science needs and data gaps across the Park.

In conclusion, the Adirondack Council does not support the application of ProcellaCOR in Sheep Meadow Bay and Blairs Bay until more science and data can be collected. Lake George is a leader in invasives management, and many other communities around the Park are watching this process. Before ProcellaCOR is used at prolific levels around the Park, we ask that the Agency work to collect more long-term science to better understand how the chemical impacts ecology, moves through a waterbody, persists in sediment, and more. We thank you for reviewing our comments and we look forward to your response.

Sincerely,



Jackie Bowen
Director of Conservation

Blake Neumann
Clean Water Advocate

From: fishneptune@aol.com
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Against use of ProcellaCOR in our lake
Date: Thursday, March 31, 2022 8:43:31 AM

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,

Joe & Mary Jordan

PO BOX 724
Bolton Landing, Ny 12814

From: Robin Emery
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA project - milfoil
Date: Wednesday, March 30, 2022 8:53:15 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

The Lake George Association, of which I am a member, has asked that I contact you and request a denial of the application for use of a chemical herbicide in Lake George.

I am happy to do so, as evidenced below. I read of this recently and became quite concerned and had every confidence that the "waterkeepers" would do due diligence and research this proposal and the safety of such an environmentally dangerous use of chemicals in our lake.

It would take years and years of research before all of the ramifications are studied. This is the first I have even heard of use of such a chemical. I will defer to those who know. And it seems that all of the testing and precautions have NOT reached the level that anyone should take such a chance using this chemical prematurely.

My family has lived on this lake for two generations and the value of my homes are directly impacted by these decisions. Our love for this lake is immeasurable.

I agree with the stated opinions below.

"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,

Robin Emery

24 Ferndale Ave.

Glen Rock NJ 07452

and 11 and 12 Silver Bay Road Silver Bay NJ 12874

From: Theresa Difede
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Project 2020-0003 and -0004
Date: Thursday, March 31, 2022 2:17:22 PM

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

Dear Mr. Walrath:

I respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR tm to treat Eurasion watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of NYS. 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 algae 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 NYS – 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 Lake George.

Sincerely,

Theresa DiFede, former resident of NYS and now frequent visitor to Lake George
30 Sunnycrest Ct.
Little Silver, NJ 07739

From: David Strang
To: APA Regulatory Programs Comments
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 8:07:47 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

David A. Strang

2626 Wabasso Trail Way, Putnam Station, NY 12861

29 Tarrywile Lake Rd, Danbury, CT 06810

From: Jeanne Eliseo
To: APA Regulatory Programs Comments
Subject: APA PROJECT 2020-0004
Date: Wednesday, March 30, 2022 8:19:31 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Jeanne Eliseo
PO Box 206
Huletts Landing, NY 12841

From: Mary Caravella
To: APA Regulatory Programs Comments
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 8:27:15 PM

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,

Mary Caravella

145 Cotton Point Road

Diamond Point, NY

From: Karen Azer
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA project 2020-0004
Date: Wednesday, March 30, 2022 7:30:42 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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. Karen Azer and Helene Horn

ADDRESS. 336 Cleverdale Road, Cleverdale, NY

From: Wendy Saks
To: APA Regulatory Programs Comments
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 8:24:57 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Wendy Saks

39 Waltonian Rd

Hague, NY 12836

Sent from my iPhone

From: Shannon Weber
To: APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 7:24:25 PM

Dear Mr. Walrath:

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

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

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

Sincerely,

Shannon Weber
8 Finch Way Apt G
Queensbury, NY 12804

From: Ken Beiser
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org; Dr. Elizabeth Buck; Beattie, Rob; Douglas Beattie; Denise Beattie; brian beattie; BRENDA BEISER
Subject: APA Project 2020-0004
Date: Thursday, March 31, 2022 8:39:31 AM

Leigh R. Walrath
Adirondack Park Agency

RE: APA Project 2020-0004

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™ to treat Eurasian watermilfoil. My **family home has unfiltered lake water** as our only source of drinking water, as we have since 1907.

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 Lake George.

Sincerely,

Ken Beiser

15 Bass Bay Road, Silver Bay, Hague, NY

From:	Lucinda Bhavsar
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	APA Project 2020-0004
Date:	Wednesday, March 30, 2022 8:45:51 PM

Dear Mr. Walrath:

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

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Sincerely,

Lucinda Bhavsar

917.517.7826
205 E 85th St 8M
New York, NY 10028

From: Emily Adler Boren
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 9:45:36 PM

Dear Mr. Walrath:

My family and I have been in Huletts Landing for 35 years. Lake George is precious to me and the quality of the water and air is unlike any place else I've visited on earth. Please protect it from potentially dangerous and hazardous chemicals.

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,

Emily Adler Boren

5578 Bluff Head Way, Huletts Landing, NY 12841

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Emily Adler Boren | cell: (203) 561-8186

From: Andrea Gautreau
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 8:55:42 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

I am a strong supporter of the Lake George Association and Lake George Waterkeeper and their science-guided approach to protecting our lake. As such, I respect and share their thoughtful and well-researched concerns regarding potential negative impacts to human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use. We need more evidence this is the only option, and we need to work harder in regulating and monitoring the reasons for the increase in watermilfoil as well as other methods of removal that will not impact the beauty and water quality of the lake further.

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,

Andrea Gautreau

Putnam Station

From: Keith Ferguson
To: APA Regulatory Programs Comments
Cc: Amy Ferguson; info@lakegeorgeassociation.org
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 9:35:31 PM

Leigh R. Walrath
Adirondack Park Agency

Dear Mr. Walrath:

As life-long summer residents of Lake George, 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 milfoil at this time.

We fully understand the challenges of the invasive milfoil plant. However, it is important that any chemical deployed to remove milfoil is thoroughly vetted and verified to ensure it does not have any harmful side effects. The risks are enormous. We all want to preserve the pristine quality of Lake George's drinking water.

What I don't understand is why the LGPC is thoughtlessly rushing to dump ProcellaCOR into the lake knowing that the water current will quickly spread the herbicide throughout the entire basin. Why is the LGPC opposed to a scientific study designed with the extensive resources of the Lake George Association and Lake George Waterkeeper to specifically measure the effectiveness and side effects in a controlled environment that mimics the exact environment and water conditions of Lake George? Does the APA really want Lake George to be a guinea pig?

To be clear, our issue isn't "never" use a herbicide. Our issue is why the determined rush before it has been fully tested, particularly as such a move would be irreversible?? There is an alternative: Hand harvesting today is safe, controls the spread, and buys us some time to be extra certain that there aren't any unintended consequences.

Please deny the use of ProcellaCOR in Lake George at this time and ask the

LGPC to collaborate with the extensive resources of the Lake George Association and Lake George Waterkeeper to make extra certain that ProcellaCOR is the best course of action before it is dumped in the lake we all love.

There's an old carpenter axiom: "Measure twice and cut once". The risk of unintended consequences is just far too great not to make absolutely certain before doing something irreversible.

Sincerely,

Amy & Keith Ferguson

2/3 Oahu Island, Bolton Landing, NY

29 Willetts Road, Mount Kisco, NY

From: Robert PUTT
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Project 2020-0004
Date: Wednesday, March 30, 2022 7:26:00 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Robert & Dolores Putt

Bolton Landing, NY

Sent from my iPhone

From: wright2walter@gmail.com
To: APA Regulatory Programs Comments
Cc: wright2walter@gmail.com
Subject: APA Project 2022-0003 Public Comments
Date: Tuesday, March 29, 2022 7:08:35 PM

********** 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 "2022-0003, walter wright, wright2walter@gmail.com" into your message for our reference.

****

Attn: Leigh R. Walrath
Comments from: walter wright
Email from: wright2walter@gmail.com
Address:
Re: Agency Project 2022-0003, Lake George Park Commission

My Comments:

I'm a LG multi-generaltional family member that still is lucky to spend 3-4 months a year on LG. I have young kids, and we still get our drinking water direct from LG.

Can't believe LGPC would even consider this path...without much more data and examples of what it has done, and hasn't done, to other bodies of water.

As you know LG is incredibly unique...don't use it for an experiment when long term effects are not fully known.

I could go into further detail, I am a marine science professional, but know others have voiced good reasons and examples for why, at least at this point, to not take this route.

Please don't add anything to our lake! We are already fighting invasive species (thank you for that work!)...but this could be adding another future problem.

Thank you,
Walter Wright
of Silver Bay

From: Kimberly PACALA
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Project 2022-0004
Date: Wednesday, March 30, 2022 7:22:23 PM

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

RE: APA Project 2022-0004

Dear Mr. Walrath:

We respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide 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.

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

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

Sincerely,

Mark and Kimberly Pacala

17 Spruce Mountain Lane
Silver Bay, NY 12874

From: Doug Conroe
To: APA Regulatory Programs Comments
Subject: APA Project Comments
Date: Thursday, March 31, 2022 2:01:47 PM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

This is to comment in regard to the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil in Lake George.

ProcellaCOR EC has recently been utilized in Chautauqua Lake to treat Eurasian Watermilfoil. We have not observed the success that the applicator and its protagonists have touted. Plus, our macrophyte and herbivore colonies have been observed for twenty consecutive years by Racine-Johnson Aquatic Ecologists, previously Cornell Ponds. Racine's 2021 Late Summer Report, which is posted on our website (www.chautauqualakeassociation.org), factually notes ProcellaCOR's failure to achieve results.

We are also concerned about the unintended consequences of the product. It also targets Coontail which is a prevalent and important plant species that is resident in Chautauqua Lake. The Racine report details its importance for both the fishery and to nutrient absorption. Like Lake George, Chautauqua Lake endures the presence of harmful algal blooms. Care needs to be taken to not take actions that will increase the proliferation of algal blooms and therefore utilizing ProcellaCOR becomes inappropriate.

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

We have learned that even a small pilot project experience can be fraught with unintended consequences. We suggest that a very deliberate and detailed analysis be performed before even a small program is undertaken. Given what we have learned about what comments have

been submitted to the APA, we suggest that it is way too premature to move forward with a ProcellaCOR EC at this time.

Sincerely,

Douglas E. Conroe
Executive Director/COO
Chautauqua Lake Association, Inc.
429 East Terrace Avenue
Lakewood, New York 14750
(716) 763-8602
doug@chautauqualakeassociation.org
www.chautauqualakeassociation.org

From: Pat Portela
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 9:21:39 AM

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 Portela
4318 Elm Tree Path
Huletts Landing, NY
12841

Pat Portela
Sent from my iPhone - please excuse any typos.

From: John E Kelly III
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 8:57:43 AM

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 am a resident of Lake George and serve on the Board of the Lake George Association. I am also a scientist and founding sponsor of the Jefferson Project. I am a firm believer in science-guided approaches to protecting our Lake.

I am writing to ask that the Adirondack Park Agency deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian water milfoil. This proposal is simply the WRONG action at the WRONG time.

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. We are just beginning to understand HABs in our Lake, but no one knows how this herbicide will affect these blooms. We also know that this "pilot" in two small bays, will result in a Lake-wide "experiment" as the herbicide and its chemical decomposition compounds spread throughout the Lake and into resident drinking water.

Further, there is no urgency to do this now. 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,

John E. Kelly III, PhD

241 Assembly Point Road

Lake George, NY

==========
Dr. John E. Kelly III
Executive Vice President - Retired
Special Advisor to Chairman and CEO
IBM Corporation
1 New Orchard Road
Armonk, NY 10504-1722
jekiii@us.ibm.com - 914-499-6426
==========

From:	Paul Browning
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org; Paul Browning
Subject:	APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 12:56:45 PM

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,

Paul Browning
8 Spruce Mountain Lane
Silver Bay, NY 12874

From: Kelly Hauburger
To: APA Regulatory Programs Comments; info@lakegeorgeadministration.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:58:09 AM

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,

Kelly Hauburger

17 Shaw Street

Lake George, New York 12845

Sincerely,

Kelly Hauburger

From: Jill Conway
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Wednesday, March 30, 2022 9:35:02 PM

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

RE: APA Projects 2022-0003and -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,

Gerard and Jill Conway

1693 Pilot Knob Rd

Kattskill Bay, NY 12844

From: Anil Crasto
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Wednesday, March 30, 2022 10:52:25 PM

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,

Anil Crasto
10 Woods Point Lane
Lake George.

Sent from my iPhone

From: Catherine Sconzo
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 7:53:59 AM

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,

Catherine Sconzo

175 Fuller Rd.

Queensbury, NY 12804

From: Betsy Linkowski
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 3:41:38 PM

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,

Scott and Betsy Linkowski

22 Dock Rd

Hague, NY

ADDRESS

Sent from my iPhone

From: Ted Adler
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Wednesday, March 30, 2022 9:40:26 PM

Dear Mr. Walrath:

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

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

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

Thank you,

Ted Adler

Huletts Landing, NY

From: Pat Portela
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 9:27:47 AM

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,

Patrick Gorman - 71 Greene Street, New York, NY 10012

From: Suzanne Shad
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 2:11:11 PM

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, particularly when there is an effective alternative physical method of removal.

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. A negative cascade effect from use of this herbicide is quite possible and too dangerous to risk.

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,

Suzanne Shad

4307 Foster Brook Path

Huletts Landing, NY 12841

From: Jennifer Danese
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 3:35:16 PM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Jennifer Danese
PO Box 1890
Silverthorne, CO 80498
(Formerly residing on Truesdale Hill Rd in Town of Lake George)

From: Jane Carter
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 8:44:52 AM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

We respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide 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.

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

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

Sincerely,

Jane and Richard Carter
25 Carleton Ave
Briarcliff Manor, NY 10510
and
4027 Eichler Way
Huletts Landing, NY 12841

Please excuse typos

From: Tom Brennan
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Wednesday, March 30, 2022 11:10:44 PM

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 a lifelong summer resident of Lake George, 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,

Thomas Brennan
summer address:
8048 Lakeshore Drive
Silver Bay NY 12874
rest of the year address:
1 Richard Drive
Pittsfield, MA 01201

From: Andrew Emery
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 9:48:12 AM

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,

Andy Emery
286 NYS Route 9N
Ticonderoga, NY. 12883

From: Patrick Gorman
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:28:39 AM

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,

Patrick Gorman - 71 Greene Street, New York, NY 10012

From: Daniel Guyder
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Wednesday, March 30, 2022 10:01:57 PM

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 am a frequent visitor to Lake George and the wider Adirondack Park. 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 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 hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes.

Sincerely,

Dan Guyder

43 Prospect Street

Mount Kisco, NY 10549

From: Donna Hamilton
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 1:37:27 PM

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,

Donna Hamilton

98 Surrey Fields Drive

Queensbury, NY

From: Karen
To: APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject: APA Projects 2022-0003 and 2022-0004
Date: Wednesday, March 30, 2022 9:27:06 PM

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

RE: APA Projects 2022-0003 and 2022-0004

Dear Mr. Walrath:

We respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide 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.

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

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

Sincerely,

Mark and Karen Faeth

866 Gull Bay Road

Putnam Station, NY 12861

From: P&C Lynch
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-003 & 0004
Date: Thursday, March 31, 2022 11:03:08 AM

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,

Christopher Lynch
P.O. Box 1232
Bolton Landing, NY 12814

From: Kristin Davidson
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 2022-22-000s and - 0004
Date: Thursday, March 31, 2022 11:20:17 AM

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

Dear Mr. Walrath:

I am writing to request that the Adirondack Park Agency deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR to treat Eurasian watermilfoil. The Park Commission has already made great strides in controlling milfoil through a vigorous and safe hand-harvesting program. I urge you to continue this approach. I'm I strong supporter of the Lake George Association and the Lake George Waterkeeper and I'm guided by their research-based concerns of the potential negative impact to health, water quality, and native plants and animals that could arise from herbicide use.

I believe that hand-harvesting is the best approach to reducing milfoil and protecting the precious waters of Lake George and the health of the community that enjoys its beauty.

Sincerely,

Kristin Davidson
51 Old Lake Road
Lake George, NY 12845

From: Jenny Brorsen
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: APA Projects 23022-3003 and 0004
Date: Wednesday, March 30, 2022 10:47:04 PM

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,

The DeMartini Family
95 Hemlock Point
Diamond Point, NY

From:	Marie Louise Lempert
To:	APA Regulatory Programs Comments
Subject:	Attention: Leigh R. Walrath/Use of chemical herbicide ProcellaCOR
Date:	Thursday, March 31, 2022 2:04:38 AM

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.

Sincerely,

Marie Louise Lempert
7504 Glenshannon Circle
Dallas, Tx. 75225

#30 Burnt Ridge Road
Lake George, NY 12845

March 23, 2022

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

Dear Adirondack Park Agency,

The Brant Lake Association (BLA) commends the Lake George Park Commission (LGPC for being a leader in combatting the threats invasive species pose to the Lake George Region and the surrounding Adirondack Park, including Brant Lake.

To reduce the spread of Eurasian watermilfoil (milfoil) throughout Lake George and into other waterbodies in the Adirondacks, LGPC inspects and decontaminates watercraft and oversees annual milfoil harvesting and removal efforts. Removing milfoil by diver-assisted, suction harvesting or hand harvesting is labor intensive, expensive, and not always fully effective, as we have learned in our own efforts to control Milfoil in Brant Lake.

The BLA fully supports LGPC's request for a permit for a limited trial application of ProcellaCOR to treat milfoil, in accordance with all permitting and labeling requirements, to monitor the efficacy and impact of the treatment method.

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

ProcellaCOR is an extremely target herbicide that uses a low dosage and has a short residence time in the water. ProcellaCOR has been approved the US Environmental Protection Agency and the New York State of Environmental Protection for use in waterbodies designated for swimming, fishing and drinking water.

The LGPC is a very important partner in the efforts to reduce the impact of invasive species in the Adirondacks. The BLA looks forward to learning from LGPC's efforts, and the possible use of PorcellaCOR to control Eurasian Milfoil in Brant Lake.

Sincerely,

Wayne H.W. Butler
President, Brant Lake Association
P.O. Box 88
Brant Lake, N.Y. 12815
wbutler141@aol.com
518 494 5794

From: Sharon Serini
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: chemical herbicide ProcellaCOR
Date: Thursday, March 31, 2022 11:09:41 AM
Attachments: LG waterkeeper.docx

Please see attached letter

SHARON SERINI
VINEYARD AVENUE ELECTRIC INC
NYS CERTIFIED WBE
523 SOUTH RD
MILTON, NY 12547
845-795-1135 (O)
845-234-1104 ©

From: clayredes@aol.com
To: APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject: Chemicals in Lake George
Date: Wednesday, March 30, 2022 8:11:24 PM

This drastic course of action without thorough study may have endless severe negative effects throughout the Lake George watershed and far beyond into other streams and lakes as well as killing fish and causing physical effects to swimmers and children. Poisoned fish caught then eaten are another concern. Take the money, buy some hatchets, hand harvest and sever the plants at their base. Then make sure they are removed far away and cannot spread their seeds, roots, etc. I do not want this action to be a precedent for other water bodies in New York state or beyond.

Claire DesBecker
Co-Chair,
Friends of North and South Twin Lakes, Elizaville NY

March 31, 2022

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

Re: Lake George Park Commission ProcellaCOR Herbicide Application APA Project No. 2022-0003 and 2022-004

Dear Mr. Walrath,

Thank you for the opportunity to comment on the Lake George Park Commission (LGPC) application for the use of the herbicide ProcellaCOR at two sites in Lake George.

My comments herein are based upon my expertise as a limnologist and developer of complex hydrodynamic models for Lake George and lakes worldwide. Moreover, I have a long interest and understanding of the issues Lake George and other Adirondack lakes face with invasive plants and animals. I have led efforts for macrophyte management since the 80's in Lake George and secured funding as Chair of The FUND for Lake George. My comments reflect my interest in a comprehensive review of this application to ensure the protection of Lake George.

I my review of the application I find that the use of ProcellaCOR in Lake George is likely to have highly significant adverse impacts on the plant and animal communities, fisheries, water quality and drinking water. The application is premature, rushed, absent of critical information, misleading and incomplete. Given these problems, it is not possible at present to fully evaluate the impact ProcellaCor will have on the Lake George ecosystem. I strongly urge the Adirondack Park Agency to table this application and take the time to fully investigate the impacts of this toxin. Trials of this herbicide should not be conducted in the waters of Lake George that so many rely upon for drinking water, fishing and recreation until more information is available.

The impacts of ProcellaCor on Lake George ecosystem cannot be scientifically evaluated given the following:

- Limited APA application requirements,
- Limited peer-reviewed toxicity testing, especially for native Lake George plants and animals,
- Limited scope of impact analysis and disregard of native Lake George plants and animals,
- Macrophyte survey methodology,
- Conflicts with USEPA label, including lake hydrodynamics and circulation,
- Reliance on non-quantitative field trial observations,
- Lack of monitoring data for algae, cyanobacteria, benthic invertebrates and zooplankton and impacts from the toxin, ProcellaCor.

Further, significant information provided by the Lake George Park Commission and its partner SePRO Corporation in this application and at informational meetings (i.e., March 2022) is not supported by the US EPA Environmental Fate and Ecological Effects Risk Assessment for the Registration of the New Herbicide for the Use on Rice and Aquatics - Florpyrauxifen-benzyl (2017) or the Environmental Fate and Effects Division's FIFRA Section 3 Environmental Fate and Ecological Effects Risk Assessment for the New Active Ingredient Florpyrauxifen-benzyl (PC Code 030093) report.

It is highly recommended that the Lake George Park Commission involve the Lake George scientific community in all future efforts to identify research and monitoring needs. Additional toxicity studies for plants and animals native and important to the Lake George ecosystem need to be conducted in a laboratory setting prior to any *in situ* trials. Further, ProcellaCOR will likely have impacts on plants and animals found in Lake George (see below).

The treatment of Lake George waters with the toxin ProcellaCOR represents a major and pivotal alteration and deviation from New York State's protection and management of this Class AA Special waterbody and Article § 43-010. I expect that the Adirondack Park Agency (APA) will draw upon all available resources to expertly respond to all questions and comments raised at this time in order to preserve Lake George's Class AA Special Status. It is incumbent the APA consider all ramifications of this application and bearing on future applications of ProcellaCOR in Lake George and the Adirondack Park. The minimum application requirements requested by the Agency precludes a full scientific evaluation of the impacts of ProcellaCOR.

Environmental Impact Analysis of the herbicide ProcellaCOR in Lake George

A. Lake George Macrophyte Management

Dave Wick, Executive Director of the LGPC, has inferred on several occasions that physical control efforts of *Myriophyllum spicatum* at the two test locations have been unsuccessful, when in fact physical control measures ceased in 2015 (Sheep Meadow Bay) and 2017 (Blairs Bay). Terms like "highly selective herbicide" are overstated and misleading as only a limited number of toxicity studies have been conducted on a small number of freshwater species. At informational meetings the LGPC stated that ProcellaCOR has "no impact on other plants and animals". This is not supported in USEPA toxicology reports and not useful to developing a successful management plan.

Further, the shift in management strategy from DASH (diver-assisted suction harvesting) to cultivation of the sites (i.e., **no management)** at these two sites is unusual. The lack of control measures of *M. spicatum* at these sites over the last 5 to 7 years would likely impact desirable native and rare plants (NYS rare and endangered list) such as *Myriophyllum alternaflorum* which is expected to be wipeout by the toxin. This "no management" approach would allow *M. spicatum* to outcompete native and protected plants such as *M. alternaflorum* which can have unintended consequences.

The species richness of Lake George includes over 50 macrophyte species (Collins, C. D. et al, 1987; Sheldon 1977), and hundreds of phytoplankton, fish zooplankton and benthic invertebrates. ProcellaCor has not provided any findings on pre-and post-treatment for most macrophytes, algae, fish, benthic invertebrates or zooplankton native to Lake George. With only a limited number of peer-reviewed toxicology tests on a limited number of species, the fate and effect of florpyrauxifen-benzyl on plants and animals in the Lake George ecosystems is unpredictable and immeasurable.

B. Plant Sampling Survey – Method Analysis

The simple rake toss survey method was utilized for the purposes of this application, presumably to achieve before and after comparisons. Although the APA requires this method, it is problematic and inappropriate for the intent of evaluating the impact of this toxin, especially on a large, oligotrophic, dynamic lake such as Lake George.

The rake toss technique involves using a 30-foot rope with a rake head(s) attached to collect whatever it happens to encounter on the lake bed. The likelihood of grabbing a particular plant or a particular plant species (i.e., its "catchability" factor) is dependent on a number of factors, each of which skews the results. Some of these factors are:

1. Sampling depth and rope length significantly impact which plants and which species are selected. The force needed to capture is species-specific and is reliant on the grab potential generated by the angle of the rope, length of the rope and holdfast or root structure of the plant.

2. Plant morphology, leaf shape, size, biomass, abundance, density, frequency also influences plant selection. The differential selectivity makes the simple rake toss an unreliable and unsuitable strategy for evaluating the treatment (Owens et al. 2010, Johnson and Newman 2011)

3. Deppe and Lathrop (1992), who pioneered the rake abundance rating method, noted that such visual estimates involve subjectivity, require additional field time and may be most appropriate for assessing short-term changes in general plant abundance as opposed to assessing individual plant species abundance. In a comparison of rake abundance ratings and diver-collected biomass samples, Johnson and Newman (2011) found that abundance ratings were significantly higher and less precise than biomass estimates and that the comparability of the two methods is dependent upon the dominant taxa present. Yin and Kreiling (2011) concluded that the efficiency of the rake to collect biomass varied among species and correlations of visual density ratings with biomass may be appropriate only if confirmed by diver-collected biomass samples for each individual species. Harman et al. (2007) reached similar conclusions and found that the rake abundance ratings and dry weight biomass estimates were comparable in only 17% of the instances, with results varied among species growth forms.

4. The information gathered is non-quantifiable and as such cannot be used to quantitatively assess post-treatment results. Any expectation that sampling is random is indeterminate. Any expectation that the sampling is representative cannot be corroborated. The angle of the rope generated from the distance thrown and depth of water creates an unreliable, species-specific potential for sampling success.

6. It is not feasible to assess all plants with one survey. For example, *Potamogeton crispus* should be surveyed in May-June before species senesces.

7. It is important to consider survey objectives to determine the best method. A grid placement of points may be an efficient way to sample a broad littoral zone in a mesotrophic lake but not in a sparsely vegetated oligotrophic lake with a narrow littoral zone (Perleberg et al. 2006). Quantitative data that are collected in a statistically valid manner are required to assess changes in plant communities in response to management activities (Madsen and Bloomfield 1993).

8. There are several standard ways to quantify plant abundance including biomass, cover, plant height, density and frequency that should be considered.

C. Algal Monitoring

The lack of algal monitoring data in the application for the treatment sites for algae (and cyanobacteria) species composition, species abundance or biomass is a significant omission critical to herbicide impact evaluation. ProcellaCor will cause a die-back of macrophytes at the sites. The rapid decomposition rate and die-back of *M. spicatum* in the trial sites will be associated with a high rate of phosphorus release to the water column. Much of the accumulated phosphorus will eventually be returned to the aquatic ecosystem. An increase in phosphorus availability is highly likely to support algal blooms. Eight harmful algal blooms (HABs) have been reported in Lake George in the last few years and precautions should be taken to prevent them.

D. Benthic Invertebrate and Zooplankton Monitoring

No benthic invertebrate or zooplankton monitoring information was provided in the application on the benthic invertebrate and zooplankton community for the treatment sites. This includes invertebrates that we know will be impacted by ProcellaCor. How will impacts be accessed without it? It is necessary to evaluate all impacts all plants and animals in the areas, not just the macrophyte community. These impacts should include relevant food chain shifts and disruptions (see below).

E. ProcellaCor Label Conflicts

The US EPA Label for ProcellaCOR and toxicology test results (Melendez et al., 2017) include a number of concerns, data needs, and conflicts with the application, these include:

1. US EPA Product Label document for ProcellaCOR™ SC states: A selective systemic herbicide for management of freshwater aquatic vegetation **in slow-moving/quiescent waters with little or no continuous outflow.** Hydrodynamic models of these sites are in conflict with the product label. The National Science Foundation report (Collins, C. D., Principal Investigator, 1988) quantifies continuous outflow rates for Lake George.

2. Florpyrauxifen-benzyl Biodegradability (Method: OECD Test Guideline 301B):
    a. Material is expected to biodegrade very slowly (in the environment).
    b. Fails to pass OECD/EEC tests for ready biodegradability.
    c. 10-day Window: Fail Biodegradation: 14.6 % Exposure time: 29 d

3. For aquatic plants, three degradates (i.e., XDE-848 acid, XDE-848 hydroxy acid, and XDE-848 benzyl hydroxy) were considered residues of concern for ecological exposure (i.e., stressors). They were included in the expression of the Total Toxic Residues (TTR) with the parent compound (TTRs), based on toxicity data, lack thereof and structural considerations. These degradates persists longer than the parent compound; however, potential accumulation of the TTRs in sediment for extended periods of time appears to be low, since the degradates have more mobility than the parent compound. Based on comparison of their structures, and mobility, the fate of the parent compound (an ester) and XDE-848 acid (an acid) is expected to differ substantially.

4. 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.

5. Species susceptibility to ProcellaCOR SC may vary depending upon time of year, stage of growth and water movement.

6. Resistance Management - ProcellaCOR SC is classified as a Weed Science Society of America WSSA Group 4 Herbicide (HRAC Group O). **Weed populations may contain or develop biotypes that are resistant to ProcellaCOR SC** 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.

7. The *Overview of Physicochemical, Fate, and Transport Properties Florpyrauxifen-benzyl* report by Melendez et al. (2017) states that in aqueous systems, the low octanol/water partition coefficient, K_{ow} suggests that the chemical has the potential to sorb onto benthic detritus as well as bioconcentrate in aquatic organisms such as fish. At lower depths exemplary of the proposed application site, how will changes in atmospheric pressure affect the functional solubility of florpyrauxifen?

8. In turbid or deeper aqueous systems (including water high in tannins or sediment), florpyrauxifen-benzyl may be more persistent (hydrolysis, pH 7 half-life = 111 days) (Melendez et al. 2017).

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.

F. Toxicity of the Auxin-mimic (hormone) Florpyrauxifen-Benzyl on Aquatic Invertebrates

Chronic studies established significant (statistical and/or biological) impacts and effects in two animal studies (Melendez et al. 2017). The mysid, *Americamysis bahia*, an opossum shrimp, and the midge, *Chironomus dilutus,* an aquatic insect, were tested. In the sub-chronic midge (MRID #49677750) and chronic mysid (MRID #49677746) studies, statistically significant adverse effects were observed at all treatment levels of florpyrauxin-benzyl, resulting in a non-definitive less-than ("<") NOAEC and a LOAEC values at the lowest test concentration of each test. Statistically significant adverse reduction of ash-free dry weight at all concentrations were observed. A chronic LOAEC of 1.1 µg a.i./L and a NOAEC of <1.1 µg a.i./L, based on a statistically significant reduction (3-5%) in female length at the lowest test concentration was established. Since statistically significant effects were noted at every test concentration, a definitive NOAEC could not be determined. **Similarly, at the lowest test concentration of 1.1 µg a.i./L (LOAEC), mysid reproduction (#young/female/day) was reduced by 21% relative to controls.** While these results were not statistically significant (p value >0.05), they were considered to be biologically significant**. Moreover, reproduction was reduced by between 16% and 46% across all test concentrations.**

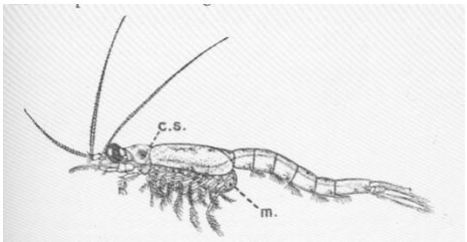

FIG. 16—*Mysis relicta*, ONE OF THE MYSIDACEA. ENLARGED. (From Lankester's "Treatise on Zoology," after Sars.) *cs*, Cervical groove of the carapace; *m*, brood-pouch

These toxicity findings are highly relevant to Lake George. First, these animals were impacted at very low concentrations. The application proposes concentration that are 7 times higher at two Lake George test sites. Second, *Mysis relicta*, the opossum shrimp native to Lake George, is closely related to *Americamysis bahia*, the opossum shrimp known to have a biologically adverse response to florpyrauxifen. *Mysis relicta* is an important large-bodied crustacean in the Lake George food chain and considered a glacial relict. It is known to exist in estuarine waters as well. **It is my highest recommendation that we take the time to test florpyrauxifen-benzyl effect on *Mysis relicta* in a safe LABORATORY setting and determine if it demonstrates a similar endocrine hormone disruption.** It is inadvisable for the APA to permit a mysid hormone-disruptor on a species that survived the Pleistocene Glaciation and only has two small broods a year!

Mysis relicta's role is critically important to the ecology of Lake George. *Mysis relicta* occurs mainly in unproductive cold water habitats and is abundant in the northern part of Lake George. Siegfried (1987) documented the importance of this large-bodied crustacea and its role

in a shift of the phytoplankton community of southern Lake George – from a community dominated by Chrysophytes, Cryptomonads, and Chlorophyta (1975–1976) to one dominated by blue-green algae, i.e., *Anacystis incerta* and *Aphanothece nidulans*. This shift in dominance can be related to changes in higher trophic levels, i.e., grazers and planktivores. Standing crop and abundance of the small-bodied filter feeders, Bosmina longirostris, *Daphnia galeata, D. dubia, Holopedium gibberum, Diaptomus minutus and D. sicilis* are significantly greater in the south basin. Standing crop and abundance of the large-bodied Crustacea, *Daphnia pulicaria, Epishura lacustris and Mysis relicta* , are significantly greater in the north basin. The clutch sizes of all herbivorous species except *D. minutus* were significantly greater in the south basin populations. These differences are consistent with greater productivity and size selective planktivory in the south basin. Stomach analysis of the recently introduced rainbow smelt, *Osmerus mordax,* indicates a marked selection for the large-bodied Crustacea. The establishment of large populations of rainbow smelt in the south basin of Lake George is responsible for significant basin differences in the abundance of large-bodied Crustacea and appears to have contributed to the changes in phytoplankton community composition. The shift to small-bodied Crustacea in the south basin has resulted in significantly lower grazing rates but generally higher phosphorus release rates in the south basin. These factors contribute to greater springtime phytoplankton production and silica depletion in the south basin. Coccoid blue-green algae are able to dominate waters with low phosphorus and silica concentrations in Lake George. Thus, the establishment of rainbow smelt in Lake George coincides with, and appears to be responsible for, changes in phytoplankton community composition.

The effect of the toxin florpyrauxifen-benzyl is classified in the Weed Science Society of America Resistance Grouping #4 as an auxin mimic that impacts fecundity of mysids by endocrine-disruption. Statistically significant reduction of female body length and offspring/ female at all concentrations have been reported. It is likely to have significant influence the food chain in Lake George.

F. Site characteristics and Toxicity issues

These trial sites are deep and drop off precipitously. The toxin will in all likelihood reach depths that will betray the stated LC50, with unknown photolytic response to light conditions. It will be critical to measure photolytic response of the toxin as a function of depth and circulation patterns. In turbid or deeper aqueous systems (including water that is high in tannins or sediment), **florpyrauxifen-benzyl may be more persistent (hydrolysis, pH 7 half-life = 111 days)** (Melendez et al. 2017).

G. Toxicity of Florpyrauxifen-benzyl on Vascular and Non-Vascular Aquatic Plants

It is highly likely that ProcellaCor will negatively impact plant species native to Lake George. *Myriophylum alterniflorum* was identified at the site and is listed by NYS as rare and endangered. *Nitella flexilis* (stonewort) was also identified at the sites. Given their close relation to the EPA toxicology model species, *M. spicatum* and *Nitellopsis obtuse*, we have every reason to expect that ProcellaCor will significantly impact these species. It is

unreasonable and irresponsible to test ProcellaCor in Lake George without taking the necessary precaution of laboratory toxicity testing of these species and others.

1. *M. alternaflorum* (the good milfoil) has been identified in the trial area and is likely to be impacted by the herbicide ProcellaCOR. Its very presence in the oligotrophic waters of Lake George, and its rare and endangered status elsewhere in New York State, speaks to the importance of the plant in an oligotrophic lake. Extirpating a plant or species from an ecosystem or assemblage can have significant consequences.

2. Our Lake George native stonewort, *N. flexilis* identified at the trial area and drift zones is very likely to be impacted by ProcellaCor. *N. obtusa* (the bad stonewort) was reduced or statistically eliminated by ProcellaCOR in Lake Minocqua, Oneida Co. and Little St. Germain Lake, Vilas Co. in ProcellaCOR field evaluations. On the other hand, *N. flexilis* is a highly desirable charophyte that grows in sublittoral meadows in Lake George and other oligotrophic lakes with low organic content. Reduction or elimination of this plant by ProcellaCor would likely have significant impacts on water quality, invertebrate habitat, nutrient cycling and algal populations and blooms.

3. ProcellaCor also stated statistically significant declines were observed with some native plant species, particularly several dicots (i.e., native watermilfoils, water marigold, white water crowfoot, etc.), while other native plant species did not exhibit any statistical changes in their Evaluation Projects in Wisconsin. **Additional data on native plant selectivity collected at one year-after-treatment on a small sub-set of lakes observed sustained reductions in the native plant species which exhibited initial declines following treatment.**

H. Ecological Based Uncertainties to the Risk Assessment

There are a number of areas of uncertainty in aquatic and terrestrial risk assessment. The toxicity assessment for plants and animals is limited by the number of species tested in the available toxicity studies. Use of toxicity data on representative species does not provide information on the potential variability in susceptibility among species to acute and chronic exposures.

1. In aqueous environments, florpyrauxifen-benzyl eventually changes into one or more transformation products. The exact identity of the transformation product portfolio that is produced, as well as the rate of production of the transformation products, depends on a multitude of aqueous environmental factors, such as temperature, mixing, water clarity, exposure to sediment and sediment composition. Consequently, risks associated with aquatics in-water use for aquatic plants are presented via Total Toxic Residue (TTR) values that are associated with the two most prominent toxic components – florpyrauxifen-benzyl and florpyrauxifen-acid – to span a range of mobility characteristics for the TTRs.

2. Because florpyrauxifen-benzyl is proposed as an herbicide to be applied to moving bodies of water (streams, rivers, etc.), uncertainty exists with regards to a) the amount of time the herbicide resides with target organisms, and b) the amount of time the herbicide resides downstream with non-target organisms. Furthermore, because the TTR is considered relatively stable (based on hydrolysis alone), a time-point to the end of the effects, and thus downstream risks to aquatic plants, cannot be easily estimated.

3. For estuarine/marine invertebrates (mysids, chronic), benthic invertebrates (midge) NOAEC values were not established (due to an unbounded low-end level). **Because no 'effect floor' was established in these studies, statistically significant effects below 1 to 4 µg/L should be expected.**

Future Needs:

1. Need for a robust plant survey extending beyond the area to be treated
2. Need for a quantifiable plant survey technique conducted on several occasions throughout the growing season
3. Need for monitoring studies of phytoplankton, zooplankton, benthic invertebrates within and surrounding the treatment area
4. Need for nutrient concentrations and loadings
5. Need for sediment samples (organic content)
6. Need to document how this application fits into the current and long-term macrophyte management plans
7. Need to conduct toxicology tests on native plants and animals

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 drinking water source.

Very truly yours,

Carol D. Collins, Ph.D.

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From: Samuel Hall
To: APA Regulatory Programs Comments
Subject: Comment on APA Project 2022-0003 (Huletts, Dresden) and 2011-0004 (Glenburnie, Putnam)
Date: Tuesday, March 15, 2022 2:36:59 PM

I would like to take this opportunity to comment and offer my support to the two projects listed on the subject line above. Both projects involve the use of ProcellaCor to battle against the invasive milfoil in Lake George.

As the Supervisor for the Town of Fort Ann, NY and the Chairman of the Washington County Board of Supervisors I fully recognize the need to control the growth of milfoil in not only the lakes in the Adirondacks but the lakes across our state.

I wholeheartedly endorse the efforts of the NYS Lake George Park Commission's initiative to use ProcellaCor to eradicate the milfoil in Lake George. I respectfully request your favorable decision on the above two approval requests.

Thanking you in advance for your consideration.

Samuel J. Hall, Chairman
Washington County Board of Supervisors,
Supervisor Town of Fort Ann

From: Bradburn, Isabel
To: APA Regulatory Programs Comments
Subject: Comment on herbicide use
Date: Wednesday, March 30, 2022 9:21:58 PM

Dr. Mr. Walrath,
I am a Lake George property owner who is very concerned about the proposed use of ProcellaCOR in the Lake. I urge you to vote against, or deny, the LG Park Commission's application to use it in the Lake to eradicate Eurasian watermilfoil. While the invasive species is a problem, use of the herbicide could well produce unintended even larger problems. I have not been able to find any reliable (i.e., peer-reviewed) research that provides clear evidence of its overall effectiveness – and lack of harm to other species, including humans and fish – in the naturalistic context of a very large lake with strong current. I worry that the use of the chemical could great degrade the water quality, water that we drink. It all it way too risky given the lack of solid scientific support and the numerous ecosystem components that could be adversely impacted.

Thank you.
Best,
Isabel Bradburn
Jacobi Point Owner's Group
P.O. Box 943
Bolton Landing, NY 12814

Isabel S. Bradburn, Ph.D.
Director of Research
Child Development Center for Learning and Research
Department of Human Development and Family Science, MC 0416
Associate Director of Strategic and Faculty Initiatives, Institute for Society, Culture and Environment (ISCE)
Program Director, Policy Destination Area
Virginia Tech
Blacksburg, Virginia 24061
540-231-1863
isbrad@vt.edu

From: Rosemary
To: APA Regulatory Programs Comments
Subject: comments for 2022-0003 and -0004
Date: Tuesday, March 29, 2022 4:32:48 PM

Following up because after we submitted our comments online for both the LGPC applications to use ProcellaCOR in Lake George, instead of email confirmations we got two strange emails

Mail Delivery System (MAILER-DAEMON@LOCALHOST)

To: you Details

This is the Email Security Gateway at host barracuda.media3.us.

I'm sorry to inform you that the message below could not be delivered.
When delivery was attempted, the following error was returned.

<pusateri14@aol.com>: host mx-aol.mail.gm0.yahoodns.net[98.136.96.93] said: 554 5.7.9 Message not accepted for policy reasons.

Not knowing whether our comments were actually submitted or not, below is the comment--same for both Lake George applications:

We are year round lakeshore residents. We drink Lake George water and swim in Lake George.

We oppose this application as premature, risking the fragile ecology of already-stressed Lake George and risking public health. Further testing, study and analysis of this herbicide (along with all its non-disclosed adjuvants and its proprietary secret additives, as well as all compounds produced as the herbicide degrades) should be conducted regarding toxicity and sub-lethal and long-term potential harm for humans and for all of the native or non-invasive animals and plants in Lake George.

If and only if all testing, study and analysis proves negative for risk of lethal, non-lethal and long term harm to humans and all non-invasive plants and animals, should use of this herbicide ProcellaCOR be considered for usage in Lake George to control one nuisance invasive species.

Thank you for the opportunity to comment.

Rosemary & Frank Pusateri

From: mlmassocaicp@aol.com
To: APA Regulatory Programs Comments
Subject: Comments on APA Project 2022-0004 - Lake George Park Commission
Date: Thursday, March 31, 2022 1:00:03 PM

Dear Adirondack Park Agency,

The Chateaugay Lake Foundation would like to express its support for the Lake George Park Commission's application to test the use of ProcellaCOR to control Eurasian water milfoil (EWM) in Lake George.

Like Lake George, Chateaugay Lake has a long-standing infestation of EWM. We have seen EWM reach densities such that it compromises recreational uses, water quality and habitat in severely affected areas throughout the lake system. This will be the fifteenth year that the Chateaugay Lake Foundation has raised funds and carried out milfoil management efforts on the lake. The methods have included benthic matting, now discontinued due to limited effectiveness, and removal of milfoil by hand-harvesting, primarily hand-pulling. We rely on hand-harvesting to clear dense beds that are subject to heavy boating activity, spending about $45,000 annually for six weeks of work. This is nowhere near what would be needed to achieve control, but it is what resources—primarily small donations from individual donors—permit. We sorely need more cost-effective approaches to help manage invasive milfoil in our lake and other similarly affected Adirondack lakes.

We were excited to hear of the promising results achieved by Minerva Lake using ProcellaCOR to control Eurasian water milfoil. Because it is effective at small doses, below the drinking water threshold, it can be used with minimal use restrictions and costs less than other aquatic herbicides. It is also highly specific to milfoils, reducing impacts on native plant communities. Lake George's proposed project would offer a chance to test how ProcellaCOR could be used for treatment in the context of a larger water body. It would offer important information for other Adirondack lakes that are interested in how ProcellaCOR could be used to increase the overall effectiveness of EWM control strategies as well as their cost-effectiveness. The Chateaugay Lake Foundation hopes to learn from LGPC's experience to better inform future projects.

Sincerely,

Mary Johnson

Mary Johnson
President, Chateaugay Lake Foundation

From: David R
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Concern over APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 1:34:39 PM

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 am a property owner on Lake George and 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. Many property owners pull their drinking water from the lake and do not want to live in fear of this proposed chemical from being accidentally ingested. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

Until more is known about this chemical, why not continue with the very successful and much safer hand harvesting program? This seems to be the safe and common-sense solution at this time.

The lake is treasured by many because of its natural purity and cleanliness. Please do not put that at risk when we have other safe options available such as harvesting. The lake is too important and the stakes are too high to proceed with this treatment without all parties being in agreement. More time is needed to fully vet this chemical.

Sincerely,

David W Rayno
2324 Black Point Rd
Ticonderoga NY 12883

From: blairkeller@gmail.com
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Concerns over ProcellaCOR use in Lake George
Date: Thursday, March 31, 2022 2:54:31 PM

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

RE: APA Projects 2022-0003and -0004

Dear Mr. Walrath:

First, let me thank you for your time and consideration in the comment period. I know proposed projects take a lot of time and I appreciate all you and the Agency do to understand all the relevant issues.

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. In short, altering the paradigm to include chemical usage has gone wrong for many Lakes in the country in the long term.

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.

Thank you again for your time and consideration

Sincerely,

Blair L. Keller

PO Box 1403

Bolton Landing, NY 12814

From: Nancy Willis
To: APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject: DENY the LGPC's application for the use of the herbicide ProcellaCOR
Date: Wednesday, March 30, 2022 7:44:23 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Nancy Willis
709 Gullbay Road
Putnam Station, NY 12861

From: Doug Willis
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Deny the LGPC's application for the use of the herbicide ProcellaCOR
Date: Wednesday, March 30, 2022 7:37:01 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Doug Willis
709 Gullbay Road
Putnam Station, NY 12861

From: davidyh@me.com
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Drinking water concerns regarding APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 8:29:58 AM

Dear Mr. Walrath:

I install and maintain water filtration systems for home owners on Lake George. Many home on the lake use lake water for drinking water with only minimal filtration. I am requesting a review of how the chemical herbicide could affect children and adults in those homes. I know it creates fear amongst about using lake water in those homes. Until homeowners have confidence in there children drinking this treated water i strongly feel this be delayed.

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,

David Hartmann

51 Assembly Point Road
Lake George NY 12845
860 944 1210

From: jeniles14@gmail.com
To: APA Regulatory Programs Comments
Subject: FW: ProcellaCOR use
Date: Wednesday, March 16, 2022 8:33:22 AM

Hello,

My name is James E. Niles, Town Councilman in Lake Luzerne, and holder of a bachelor's degree from SUNY in Environmental Science.

I am writing to express my support for the use of the herbicide ProcellaCOR in our lakes to control the invasion of Eurasian milfoil. Pilot projects in NY and NH have been very successful and the side effects on the systems have been virtually zero. Specifically, I encourage approval of Lake George's application quickly so it can serve as a high profile example for ProcellaCOr's effectiveness and system compatibility. Lake Luzerne intends to submit an application later this year for ProcellaCOR application in 2023. Continued serious harvesting techniques have been keeping invasion at bay, but harvesting is expensive, is only a band aid, and will never control milfoil to acceptable levels.

Thank you.

Jim Niles
Town Councilman, Town of Lake Luzerne
525 East River Dr.
Lake Luzerne, N.Y. 12846
Phone: 518-654-8128
Cell: 518-588-3104
Email: jeniles14@gmail.com.

From:	Lea Borin
To:	APA Regulatory Programs Comments
Subject:	Fwd: APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 2:07:52 PM

Begin forwarded message:

From: Lea Borin <leborin@aol.com>
Date: March 31, 2022 at 8:06:23 PM GMT+2
Cc: info@lakegeorgeassociation.org
Subject: 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,

Eric and Lea Borin

5287 Bluff Head Road

Huletts, NY 12841

From: Mary LaBrie
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Fwd: https://lakegeorgeassociation.org/milfoil
Date: Thursday, March 31, 2022 12:15:27 PM

Subject: https://lakegeorgeassociation.org/milfoil

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,
Mary LaBrie
508-265-4222

Sent from my iPhone

From: Alfred E. Dunlop
To: APA Regulatory Programs Comments
Subject: Herbicide in drinking water?
Date: Wednesday, March 30, 2022 10:32:27 PM

I drink the water in Lake George.
Clean up the septic systems, don't just put more chemicals in the water.

I am against Herbicides being put in the waters of Lake George which is a drinking water source for me and many of the residents.

Al Dunlop PhD

From: RICHARD BERLS
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Herbicide use in lake george
Date: Thursday, March 31, 2022 12:48:46 PM

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,

Richard Berls

33Springmeyer Hill

Silver Bay NY

Sent from my iPhone

From: Danielle Cordier
To: APA Regulatory Programs Comments
Cc: Tom Cordier; info@lakegeorgeassociation.org
Subject: Lake George
Date: Thursday, March 31, 2022 2:58:51 PM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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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,

Danielle Cordier

Tom Cordier, 2093 Lands End Road, Huletts Landing, NY 12841

Sent from my iPhone

From: JAMES BURG
To: APA Regulatory Programs Comments
Subject: Lake George
Date: Thursday, March 31, 2022 8:35:53 AM

Dear Mr. Walrath:

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

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

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

Sincerely,

NAME James Burg
46 Hayden Point loop
Diamond Point, NY 12824

Sent from my iPad

From: Paul McPhillips
To: APA Regulatory Programs Comments
Subject: Lake George Park Commission application
Date: Friday, March 11, 2022 10:40:25 AM

Dear Adirondack Park Association Commissioners, I am writing to you in my role as President of the Glen Lake Protective Association, Inc. The Board of the GLPA and our Association support the application by the Lake George Park Commission to test treat Lake George with ProcellaCOR. We treated a small portion of Glen Lake with it in 2020 and found the results to be very satisfactory. We think the use of ProcellaCOR by the Park Commission will help all lakes in northern New York directly and indirectly. The Park commission has the skills necessary to help increase our knowledge base and this information will be especially helpful to our regions smaller lakes that rely on volunteers to do this work.

As a retired businessman and lifetime resident of the region I understand as well as anyone the vital importance of Lake George to our region's economy. We need to keep the lake clean and we need to mitigate invasive species in Lake George. Glen Lake's experience with the use of ProcellaCOR indicates this treatment would be a good way to do that. We hope you will approve this application because it will help all of our lake's management and mitigation of invasive species. If you have any questions please feel free to contact me. Thank you, Paul McPhillips, President - Glen Lake Protective Association, Inc. 518-791-6779.

From:	wbutler141@aol.com
To:	APA Regulatory Programs Comments
Cc:	dave@lgpc.state.ny.us; wbutler141@aol.com
Subject:	Lake George Park Commission letter of support for ProcellaCOR treatment from Brant Lake Association
Date:	Wednesday, March 23, 2022 10:48:00 AM
Attachments:	img-220323101600.pdf

Dear Adirondack Park Agency,

The Brant Lake Association (BLA) letter of support for the Lake George Park Commission ProcellaCOR application is attached.

Please reach out with any questions.

Sincerely,

Wayne H.W, Butler
President, BLA
P.O. Box 88
Brant Lake, NY 12815
wbutler141@aol.com
518 494 5794 (home)
518 581 8629 (office)

From: James Dooley
To: APA Regulatory Programs Comments
Subject: Lake George Pesticide Use
Date: Thursday, March 31, 2022 10:27:26 AM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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

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

Sincerely,

James Dooley

401 S 37th Ave
Yakima, WA 98902

From: Lauenstein, Cecilia A
To: APA Regulatory Programs Comments
Subject: Lake George trial application of ProcellaCOR
Date: Saturday, March 12, 2022 11:56:55 AM

Hello,
I am writing in support of Lake George's request for a trial application of ProcellaCOR. As a board member of the Loon Lake Park District Association, I have witnessed firsthand the battle many of the lakes are having with milfoil and seen the success Minerva lake has had using ProcellaCOR. We will be watching what occurs with Lake George in the hope that success will mean we have a new tool for Loon Lake as well.
Very best,
Cecilia Lauenstein
89 Clarkson Road
Chestertown

From: PATRICK REED
To: APA Regulatory Programs Comments
Subject: Lake George/ProcellaCOR
Date: Saturday, March 12, 2022 2:10:16 PM

I am writing to enthusiastically support the continued successful ProcellaCOR herbicide treatment tests of ADK lakes. This next-generation herbicide is a non-toxic growth agent, and the very type of option and solution breakthrough we've needed.

Please approve the test request for Lake George.

Patrick D. Reed
Vice President
LLPDA-Loon Lake Park District Association
Town of Chester/NY

From: Amy Peardon
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: LG
Date: Thursday, March 31, 2022 2:17:14 PM

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

RE: APA Projects 2022-0003and -0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Dr Amy Peardon

154 Valley rd

Neptune, NJ 07753

INVASIVE SPECIES MANAGEMENT
ADIRONDACKS

March 2, 2022

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

Dear Adirondack Park Agency,

The Adirondack Park Invasive Plant Program (APIPP) commends the Lake George Park Commission (LGPC) for being a leader in combatting the threats invasive species pose to the Lake George region and the surrounding Adirondack Park.

In order to reduce the spread of Eurasian watermilfoil (milfoil) throughout the lake and into other waterbodies in the Adirondacks, LGPC inspects and decontaminates watercraft and oversees annual milfoil harvesting/removal efforts. Removing milfoil by diver-assisted, suction harvesting or hand harvesting is labor intensive, expensive, and not always fully effective. APIPP supports LGPC's request for a permit for a very limited trial application of ProcellaCOR to treat milfoil, in accordance with all permitting and labeling requirements, in order to monitor the efficacy and impact of this treatment method.

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

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

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

Sincerely,

Tammara Van Ryn

Tammara Van Ryn, APIPP Program Manager

Adirondack Park Invasive Plant Program (APIPP)
(518) 576-2082 . PO Box 65 . Keene Valley, NY . 12943
www. adkinvasives.com

From:	Chris Navitsky
To:	APA Regulatory Programs Comments
Cc:	Eric Siy; Thomas A. Ulasewicz, Esq.; Ana Velasquez; dave@lgpc.state.ny.us; Zalewski, Joseph M (DEC)
Subject:	LGPC ProcellaCOR Herbicide Application - APA Project #s 2022-0003 & 2022-0004
Date:	Thursday, March 31, 2022 2:47:34 PM
Attachments:	Outlook-5mf5scqv.png LGPC_Procellacor_apa 2022-003&004_033122_DRAFT(TAU 3)_cn.docx.pdf

To Leigh Walrath -

Good afternoon and please find our technical comments for the above referenced applications as per the Notice in the ENB for the Adirondack Park Agency's review on behalf of The Lake George Association and the Lake George Waterkeeper.

Please feel free to contact me regarding any questions or comments you may have regarding this public comment.

Thank you for your consideration and we look forward to discussing these concerns with the Agency.

Best regards -

Chris Navitsky

Chris Navitsky, P.E.
Lake George Waterkeeper
P.O. Box 408
Lake George, NY 12845
518-668-9700 x301

www.lakegeorgewaterkeeper.org

Lake George WATERKEEPER®

Member of Waterkeeper Alliance

From:	Dan
To:	APA Regulatory Programs Comments
Cc:	dave@lgpc.state.ny.us; coachbobh@verizon.net; girlingnm@gmail.com; apetrongolo56@gmail.com; sireland1@gmail.com
Subject:	LGPC ProcellaCOR trial
Date:	Wednesday, March 23, 2022 4:12:56 PM

The Paradox Lake Association is aware of the proposed trial application of ProcellaCOR in Lake George by the Lake George Park Commission. We fully support their trial and look forward to the results it will provide. The diligence and rigor which LGPC will apply to the trial will provide beneficial observations that can be used by the Paradox Lake Association other Adirondack lakes in the future. In fact, the Paradox Lake Association is looking forward to using ProcellaCOR soon, but we are deadlocked by the 2018 MOU which prohibits use in waters within the forest preserve, and hope it is amended soon. We are confident that LCPC's success will accelerate the fight against aquatic invasives throughout NYS.

Sincerely,
Dan Gorke, President
Paradox Lake Association

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

From: Tony taverni
To: APA Regulatory Programs Comments
Subject: LGPC"s trial application of ProcellaCOR herbicide
Date: Monday, March 14, 2022 10:32:29 AM

The Friends Lake Property Owners Association supports the Lake George Park District's trial application of ProcellaCOR herbicide. Friends Lake is surrounded by lakes that are contaminated with milfoil: Schroon, Loon, Brant, and Lake George. We have not had an occurrence of milfoil, but believe that it is a matter of time, despite our best efforts, before one could occur. Last week the Chester Town Board approved the creation of an Aquatic Plant Control District for Friends Lake, and final approval should be granted in 30 to 60 days as provided by Town Law. At same meeting, the Town Board also completed the SEQRA application required in the creation of this District .

We are aware of the results of the use of this herbicide in a treatment program on Minerva Lake in 2020. The FLPOA is interested in any activity that could minimize the property tax consequences arising from the creation of this District and subsequent treatment programs. The results of this application in Minerva demonstrated that it was very effective and would be considerably less expensive, over the long term, than the conventional treatments currently in use in the Adirondacks. Granting the LGPC's request would expand our knowledge base and be of great benefit to our property owners if the situation arises.

We fully support this trial application by LGPC.

Respectfully Submitted,

Tony Taverni, President of the Friends Lake Property Owners Association

From: Jon McGloin
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Date: Wednesday, March 30, 2022 7:46:34 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Jon and Sherry McGloin

47 Halcyon Lodge Road

Lake George, NY 12845

From: Patrice Schelkun
To: APA Regulatory Programs Comments
Date: Thursday, March 31, 2022 11:28:59 AM

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 a grandmother of young children who have regularly enjoyed swimming in Echo Bay on Lake George, where millfoil has been successfully hand-harvested in recent years, I respectfully ask you 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,

Mrs. Patrice Schelkun

8406 Mallards Way, Naples, FL 34114, and

3245 Baker Lane, Kattskill Bay, NY 12844 (Summer)

From:	Peter Menzies
To:	APA Regulatory Programs Comments
Subject:	APA Project 2020-0004
Date:	Wednesday, March 30, 2022 7:37:22 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Peter L. Menzies

Vice Chair, The Lake George Association

From: Robert Stupp
To: APA Regulatory Programs Comments
Subject: Milfoil in Lake George
Date: Wednesday, March 30, 2022 8:56:57 PM

Please proceed with the proposed herbicide application in Lake George. Hand harvesting is not realistic and the problem seems to be getting worse.

Robert Stupp
POB 1444
Bolton Landing, NY 12814

From: Katy Boxley
To: APA Regulatory Programs Comments
Subject: Milfoil ttreatment
Date: Thursday, March 31, 2022 12:07:54 AM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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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,

Katy Boyd-Boxley
12 Fishing Hole Loop
Kattskill Bay, NY 12844

From: Joan Parlin
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Milfoil
Date: Wednesday, March 30, 2022 7:31:06 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

I plead with you to at least wait until this chemical is tested further.

Sincerely,

Blackwood and Joan Parlin

Sent from my iPad

From: robbin gibson
To: APA Regulatory Programs Comments
Subject: No Chemical Herbicides in Lake George
Date: Wednesday, March 30, 2022 7:36:08 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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Sincerely,

Robbin Gibson

Bolton Landing

--

From: Delphine Brown
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Objection to LGPC"s ProcelllaCOR Application to Treat Milfoil
Date: Thursday, March 31, 2022 2:13:25 PM

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 family has enjoyed the beautiful waters of Lake George for seven generations. We own homes on the lakeshore and the lake is our source of drinking water. We object to the addition of chemicals, specifically ProcellaCOR, to the Lake as dangerous and unnecessary. The sources of milfoil invading the Lake should be addressed with repairs to commercial wastewater systems and inspections of foreign boat traffic.

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,

Delphine Knight Brown

Huletts Landing, NY

From: Elizabeth Hildebrandt
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Opposition to the use of PrcellaCor to Treat Eurasian watermilfoil
Date: Thursday, March 31, 2022 2:25:26 PM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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Sincerely,

Elizabeth Hildebrandt

205 Carmen Hill Road #2
New Milford, CT 0677

From: Judith Willner
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Please Deny Permit to use Herbicide in Lake George
Date: Thursday, March 31, 2022 7:22:03 AM

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,

Judith Willner, MD

903 Shelving Rock Rd.

Fort Ann, NY

12827

From: Jim Ferris
To: APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject: Please deny the use of herbicide in Lake George
Date: Thursday, March 31, 2022 10:35:43 AM

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.

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,

Jim and Lori Ferris
378 Cleverdale Road
Cleverdale, NY 12804

Jim Ferris
Manager
WAX 'n' WiX
38 Montcalm Street
Lake George, NY 12845
T: 518-668-5988
www.waxnwix.biz

From: Nancy Thiel
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Please deny
Date: Thursday, March 31, 2022 5:01:11 AM

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 our source of drinking water. 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,

Nancy Thiel
15 Seneca Way
Silver Bay, NY 12874

From: Michael Martignetti
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Please Hold Off On Using ProcellaCOR Until Further Study
Date: Thursday, March 31, 2022 10:19:14 AM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

The health of Lake George and the lands surrounding it are so vitally important to us. Our extended family has lived on the lake's shoreline for over 100 years and we along with countless others dearly value and protect the lake at all costs. The APA has always worked in concert with the many organizations which protect the lake, now there is a disagreement as to which is the best practice for riding the lake of Eurasian watermilfoil. Rather than push one method forward against the will of well meaning and informed other stewards of the lake, what's the harm in pausing to gather more information and continue with the hand-harvesting method which seems to be working fine for now?

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,

Michael Martignetti & Yvette Beeman

Michael Martignetti
Yvette Beeman

33 Fish Point Road
Bolton Landing, NY 12814
781-862-1979
martignettimichael@gmail.com
yvettebeeman@gmail.com

From: Justin White
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Please NO ProcellaCOR
Date: Thursday, March 31, 2022 3:11:07 PM

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

RE: APA Projects 2022-0003and -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.

When I was a child the Army Core of Engineers sprayed the lake shore with DDT, which at the time was thought to be a harmless insect preventative: it caused DECADES of harm to the ecosystem. ProcelleCOR could very possibly do the same harm... it requires far greater scientific review.

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,

Justin White

545 Bluff Head Rd

Hullett's Landing, NY 12841

From: Thurston, Sally A (Retired Partner)
To: APA Regulatory Programs Comments
Cc: Thurston, Sally A (Retired Partner); info@lakegeorgeassociation.org
Subject: Please Oppose the use of ProcessaCORTM in Lake George!
Date: Wednesday, March 30, 2022 10:17:41 PM

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 was born and raised in Queensbury, NY and spent my summers on Lake George since I was a child. I am now fortunate enough to own a home on Friends' Point, directly across the lake from Blair Bay. My children and I regularly water ski on, and kayak in that bay, and I can attest to you that it is not still water. We drink from the water in the Lake, taken directly from a pipe that extends far out into the gorgeous waters of Lake George. We are blessed.

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. We are incredibly fortunate to have a dedicated team of scientists from the Fresh Water Institute, IBM and the LGA to guide us in our stewardship of this wonderful treasure.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in The Queen of American Lakes. We have been using this method to address milfoil for the last 20+ years, and I don't believe that there is a current crisis that merits a rush to use something that is unproven at this time.

There is only one Lake George. I urge you to take the time that is required to study this issue more

closely before allowing use of an unproven pesticide in our wonderful lake.

Sincerely,

Sally Thurston
270 Riverside Drive Apt 4A
New York, NY 10025

15 Commons Way
PO Box 594
Hague, New York 12836

Sally A. Thurston
Retired Partner
Skadden, Arps, Slate, Meagher & Flom LLP
One Manhattan West | New York | NY | 10001
T: +1.212.7354140 | F: +1.917.777.4140
sally.thurston@skadden.com

pronouns: She/Her/Hers


Please consider the environment before printing this email.

From: John Nick
To: APA Regulatory Programs Comments
Subject: Procella COR
Date: Saturday, March 12, 2022 11:30:39 AM

Good morning,
MY name is John Nick ad I am the President of the Loon Lake Park District Association in Chestertown, Warren County.
I would like to recommend that the APA approve the application by the Lake George Park Commission to test Procella COR in Lake George.
Our Association hand harvests at a great expense annually.
We need another way to get our Lake past the maintenance phased that we are presently in.
Regards
John Nick

Sent from Mail for Windows

From: Jackie O"Connor
To: APA Regulatory Programs Comments
Subject: Procella...NO!!!!!!!!!
Date: Thursday, March 31, 2022 2:35:31 PM

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,

NAME Jacqueline O'Connor

ADDRESS Summer: 987 County Road 6, Huletts Landing, NY 12841

Winter: 34 The Waterway, Manhasset, NY 11030

JOC

From: Diane Stenberg
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: ProcellaCOR Application
Date: Thursday, March 31, 2022 1:34:06 PM

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 not only a national treasure and an incredibly valuable environmental and economic resource for all of New York State, it is a unique and irreplaceable gem that we have the responsibility to protect. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time. The thought of pouring this chemical into the waters of Lake George is tragic to me when the current hand-harvesting program has proven to be a safe and successful method for managing the milfoil.

I believe this is the proper approach, and hope the APA will agree to continue to support the current mitigation efforts and deny the currently proposed use of ProcellaCOR in Lake George. Once a chemical is released into Lake George there is no reversing what could potentially be a tragic mistake with long term negative impacts that will remain long after we are all gone.

Thank you for your consideration on this matter.

Sincerely,

Diane Stenberg

12 Silver Bay Road

Silver Bay, NY

From: phill/laura mitchell
To: APA Regulatory Programs Comments
Subject: procellaCOR in Lake George APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 2:50:06 PM
Attachments: Leigh R SONAR LIKE HERBICIDE.docx

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

"Safe" Herbicides are ruining and ending lives early. Parkinson's disease being suffered by countless farmers and others who worked with herbicides closely correlates with exposure to these "Safe" chemicals. I can live long and well with weeds in the lake but not with the debilitating diseases that are linked to herbicide exposure. Please do what you can to keep herbicides out of my drinking water, even ones that are currently thought to be safe.

If you do choose to poison the waters of Lake George please consider the following safeguards and compensation for the suffering inflicted. Modeling of the flushing of the herbicides and decomposition products from Lake George would seem to be a necessary and complex task. The concentration over time should be calculated for each outfall and each user of water from the lake. Each person who uses water from the lake must be contacted and given an estimate of the concentration versus time at their point of use. A positive verified response to a third party from each user must be obtained prior to using the herbicide. Each person who feels the water quality is adversely affected by the chemical addition should be supplied with clean water or generously compensated for the degradation in water quality they perceive. People will be fearful. Some will be more fearful than others.

Sincerely,

Phillip and Laura Mitchell

2960 NY-9L, Lake George NY 12845 (Dunhams Bay)

From: Kimberly Dellis
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: ProCellaCOR in Lake George
Date: Thursday, March 31, 2022 7:21:48 AM

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,

Kimberly Dellis

9 Northbrook Dr

Bolton Landing, NY 12814

Sent from my iPad

From: Jim Lieberum
To: APA Regulatory Programs Comments
Subject: ProcellaCOR trial statement
Date: Thursday, March 31, 2022 1:20:40 PM

At this time the Warren County SWCD (District) is in support of the LGPC's application to the APA, for the consideration of a trial application utilizing ProcellaCOR herbicidal treatment in Lake George for the control of Eurasian Watermilfoil (EWM).

For a number of years the District has worked with residents and lake associations on the management of aquatic invasive species and it is challenging for various reasons. A frequent question asked by landowners and associations is why not use a chemical treatment? We are aware of potential issues that improper use or applications can create and inform the public on the issues. From our understating ProcellaCor so far has been shown to have to low toxicity and minimal impacts to water chemistry and organisms, while being very effective on the targeted species. The District does not endorse utilizing chemicals in any form as a broad approach to conservation. However in the case when ecological changes to our waters are occurring, and there are limited effective alternative options, then further considerations should be evaluated. The science should bear out the applicability of use as far as health and safety for humans and the environment and so far through the research and studies, this has been the case. The use of this product has occurred in lakes across the US and NY and so far there is cautious optimism about the treatments. If the product is deemed safe to use, then it should be considered by the regulatory agencies. Those agencies are the ones who have the ability to determine the issues or concerns that need to be addressed, prior to the use of any chemical in our waters.

It should go without saying that if any data shows that this is not effective or that potential concerns outweigh the assumed benefits, then use of this chemical should cease or at a minimum a further review of its use conducted. There are enough chemicals going into our lakes from roads, atmospheric deposition, lawns and homes/businesses/industry that we need to be judicious on any additional applications which are under our control.

Jim Lieberum, CPESC
District Manager

Warren County SWCD
394 Schroon River Road
Warrensburg NY 12885
518.623.3119
www.warrenswcd.org

From: Mimi Scully
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: ProcellaCOR
Date: Thursday, March 31, 2022 7:55:32 AM

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,

Mimi O'Connell Scully

19 Bass Bay Road
Silver Bay, NY 12874

From: Judy Dooley
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: ProcellaCOR
Date: Wednesday, March 30, 2022 9:02:30 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Judy Dooley

2964 NYS Route 9L

Lake George, NY

From: Amanda
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: ProCellaCOR
Date: Thursday, March 31, 2022 1:46:32 PM

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,

Amanda Modale

Fielding Lane, Cleverdale, 106 years!

From: James Napoli
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org; Charlotte Forrest LSW (forrestc1987@gmail.com)
Subject: ProcellaCORTM
Date: Thursday, March 31, 2022 1:37:53 PM
Attachments: image001.png
image002.png
image003.png
image004.png

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,

James Napoli

2 Walker Point Lane

Bolton Landing, NY 12814

James C. Napoli

Caesar, Napoli & Spivak PLLC
The Woolworth Building
233 Broadway
New York, NY 10279

212.226.2100
www.caesarnapoli.com

From:	shari guidos
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	ProcellaCORTM
Date:	Thursday, March 31, 2022 12:18:19 PM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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

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

Sincerely,

Shari L. Guidos

5 Fielding Place, Cleverdale, NY 12820
Sandy Bay, Lake George

From: Denise Beattie
To: APA Regulatory Programs Comments
Subject: Proposed use of ProcellaCOR
Date: Thursday, March 31, 2022 11:08:41 AM

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,

Denise Beattie
6290 E Placita Chiripa
Tucson, AZ. 85750

Summer home:
Beattie home
11 Bass Bay Rd
Silver Bay, NY 12874

Sent from my iPhone

From: Sue Torrey
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: PROTECT Lake George -- naturally!
Date: Thursday, March 31, 2022 9:03:51 AM

Mr. 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 and URGENTLY 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.

I grew up camping on Lake George. My parents began this family tradition many years before I was born, with my two brothers. At 6 months old I took baths in a dish tub filled with lake water. I learned to sail a Sunfish in her stormy northern blows. It most assuredly became part of my DNA -- at least it sure feels like it.

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

As you know, many hands make light work. As you also know, hundreds if not thousands of people are willing to roll up their sleeves, and literally dive in to help The Queen of American Lakes. The Park Commission itself proudly attests that 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 continuing this successful, low-tech strategy is the proper approach, and hope the APA will agree with this assessment and deny the currently proposed use of ProcellaCOR in Lake George -- OUR lake.

Warmly, sincerely, and adamantly,

Sue Torrey
Newtown, CT

203.522.0645

From: JOHN MAIER
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org; ebrainard@comcast.net
Subject: Public Comment on APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 8:40:32 AM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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

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

Sincerely,

John R. Maier
mailing: PO Box 1632
residence: 61 Hemlock Point Road
Bolton Landing, NY 12814

From: Peter Bauer
To: APA Regulatory Programs Comments
Subject: Public Comments
Date: Thursday, March 31, 2022 5:28:56 PM
Attachments: 220331-APA-Lake-George.pdf

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

Dear Leigh Walrath:

Greetings.

Please find attached the public Comments from Protect the Adirondacks on
APA Project 2022-03/04.

Thank you.

Cheers,

--
Peter Bauer
Executive Director
Protect the Adirondacks
Office (518) 251-2700
Cell (518) 796-0112
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.protecttheadirondacks.org%2F&data=04%7C01%7CRPcomments%40apa.ny.gov%7Cfb9ea8b68c294a2863f408da135d5c6f%7C66cb8ea79004d108ceb80e8c1c81ee7b%7C0%7C0%7C637843589360488699%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000&sdata=kqgkTebP8CSYsypCHQYyy0hx52UypxP3Gm6%2Bety8tY%3D&reserved=0
Mail: PO Box 48, North Creek, NY 12853
Office: 105 Owen Mountain Road, Johnsburg, NY 12843
@ProtectAdkPark
Facebook: Protect the Adirondacks

From: k m
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Project 2020-0004 - No ProcellaCOR in Lake George
Date: Wednesday, March 30, 2022 8:12:25 PM

RE: APA Project 2020-0004

Mr. Walrath:

We respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR™ to treat Eurasian watermilfoil.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. We believe this is the proper approach for now.

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

Lake George has been closely monitored and well protected over the past several decades. This is not the time to reverse that approach. There is no reason to rush into a "solution" that might turn out to create more problems than it solves. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

Continue with the manual harvesting. Allow the studies to continue. If and when it becomes clear that the chemical would be a safe treatment, then it can be pursued. If it turns out not to be a viable option, then no harm will have been done in the meantime.

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

Thank you.
Kathy & Steve Murray

From: Meg Emery
To: APA Regulatory Programs Comments
Subject: RE: APA Project 2020-0004
Date: Wednesday, March 30, 2022 9:10:08 PM

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,

Meg Emery

2315 Vermella Way

Lyndhurst, NJ 07071

(Summer home 12 Silver Bag Rd. Silver Bay, NY)

Sent from my iPhone

From: Peter Rosenthal
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Project 2020-0004
Date: Wednesday, March 30, 2022 9:37:53 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

I, and my family, have had an alm0st 80 year l0ve affair with Lake Ge0rge. My parents saw t0 it that my br0thers and I grew up swimming in, b0ating 0n, respecting and drinking fr0m its crystal clear waters. S0 t00 have I with my children. I have watched as devel0pment and p0pulati0n gr0wth have impacted the Lake. I d0 understand that b0th are inevitable and, perhaps necessary. I d0 truly despair, h0wever, when the Lake is injured by the hasty, thoughtless 0r ill considered actions,whether by individuals, business, 0r g0verning agencies.

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

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program.

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

Sincerely,

Peter & Sandy R0senthal

12 Parkside Drive
B0lt0n Landing, NY 12814

From: Janet Karp
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Project 2020-0004
Date: Wednesday, March 30, 2022 9:09:44 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

I fell in love with Lake George as a young child and continue to spend summers there. 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. Please do not allow the

use of ProcellaCOR in our beloved Lake. Let's continue to use the hand-harvesting program. Let's ramp up the hand -harvesting program and protect our drinking water and human health as well as the flora and fauna of this most wonderful natural resource.

Sincerely,

Janet Karp
43 Pine Cove
Hague, NY 12836

From: Janet Karp
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Project 2020-0004
Date: Wednesday, March 30, 2022 9:18:49 PM

Leigh R. Walrath

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

As a homeowner on beautiful Lake George, 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. Please do not allow the

use of ProcellaCOR in our beloved Lake. Let's continue to use the hand-harvesting program. Let's ramp up the hand -harvesting program and protect our drinking water and human health as well as the flora and fauna of this most wonderful natural resource.

Sincerely,

Joel S. Karp, Ph.D.
43 Pine Cove
Hague, NY 12836

From:	Lynn O. Wilson
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	RE: APA Project 2020-0004
Date:	Wednesday, March 30, 2022 8:12:06 PM

Leigh R. Walrath

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

I have already communicated with you about my opposition to ProcellaCORTM as follows:

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

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

Since I now have the opportunity to copy the Lake George Association on this email, I add the following:

The Lake George Park Commission would be better off taking care of illegal and/or polluting sanitary systems instead of approving chemicals to be put into the Lake. In addition, the drugs, chemicals, and effluent which property owners, developers, ice fishermen, boaters, etc. are putting into the Lake.

Lynn O. Wilson, Ph.D.

Pilot Knob, NY

From: LORRAINE CARBOGNIN
To: pcbrothe@roadrunner.com
Cc: APA Regulatory Programs Comments
Subject: Re: APA Project 2022-0004 Public Comments
Date: Monday, March 28, 2022 1:35:39 PM

Thank you for your quick response. Excellent information, and you make a great point. May I share your comments with the members of our Board & Assembly Point residents?
Lorraine Carbognin
Rec Secretary

Sent from my iPhone

> On Mar 27, 2022, at 1:44 PM, pcbrothe@roadrunner.com wrote:
>
>
> ********** 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 "2022-0004, peter brothers, pcbrothe@roadrunner.com" into your message for our reference.
>
> **********
>
> Attn: Leigh R. Walrath
> Comments from: peter brothers
> Email from: pcbrothe@roadrunner.com
> Address: 12 tall timbers rd NY 12845
> Re: Agency Project 2022-0004, Lake George Park Commission
>
> My Comments:
>
> When my father (John Theodore 'Ted' Brothers) was involved with the Lake George Association for many years including a tenure as President, the debate about using SONAR was being debated to get rid of milfoil and similar comments were made during the time. It was mentioned by advocates for use of SONAR that it is 'perfectly safe if used in limited quantities.' Never mind that on a bottle of SONAR, the label says 'toxic, hazardous, lethal.' Procella is an herbicide and I don't want this herbicide in a lake that people take their drinking water from. My father, civil engineer, currently 93 and still here, would say the same thing. Recently, to paraphrase, Lake George Park Commission Executive Director Dave Wick conflicted his own belief and/or that of the Lake George Park Commission he is representing. According to an article in Lake George Mirror a couple weeks ago, Mr. Wick said something like 'hand harvesting is working about 80% of the time yet concern is for the other 20% that needs to be taken care of. ' Let me mention this again as Mr. Wick was saying - hand harvesting is working 80% of the time. With this kind of success, it seems to be non-burdensome at best to eradicate the remaining 20%+. Yes, hand harvesting has required financial resources yet it is working. Mr. Wick's comments are conflicting at best and we should not follow through with testing as once again, hand harvesting is working. We don't want a chemical used in a body of water that people take their drinking water from.

From:	Brigitte McD.
To:	APA Regulatory Programs Comments
Subject:	RE: APA Projects 2022-0003 and -0004
Date:	Wednesday, March 30, 2022 9:33:50 PM

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,

Brigitte McDonald

From: Jim Meyer
To: APA Regulatory Programs Comments
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 12:29:31 PM

Dear Mr. Walrath,
I am in favor of the use of the chemical herbicide ProcellaCOR to treat Eurasion watermilfoil in Lake George. The use of these types of herbicides have been studied by New York State since at least 1986!
I have full confidence in the Lake George Park Commission and trust their scientific reviews on the subject. "Follow the science."
Let's use every safe method to eradicate this invasive and allow native vegetation to return in its place.
Jim Meyer
Queensbury, NY 12804

From:	Dan Morrissey
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.com
Subject:	RE: APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 7:23:28 AM

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^{TM}to treat Eurasian watermilfoil. Lake George is a national treasure and an incredibly valuable environmental and economic resource for all of New York State. There are simply too many unanswered questions from a scientific perspective to consider using this chemical in our lake at this time.

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

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

I have been spending great experiences at Lake George since a child and now have a yearly tradition with my family and my kids. I hope to continue it the way I know it.

Sincerely,

Dan Morrissey
33 Prospect Ave

Bridgewater, NJ 08807

Sent from my iPhone

From:	Epstein, Brian
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	RE: APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 9:32:31 AM

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,

Brian and Elizabeth Epstein

16 Willow La

Bolton Landing, NY 12814

518-429-8153

From: Myla Jelliffe
To: APA Regulatory Programs Comments
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 3:00:14 PM

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,

Myla Jelliffe Punch

5425 Bluff Head Rd

Hulett's Landing, NY 12841

,

From: Cathy McDonald
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Wednesday, March 30, 2022 9:38:49 PM

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,

Catherine McDonald

5273 Bluff Head Road

Huletts Landing, NY 12841

Sent from my iPhone

From: Elizabeth Miller
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 9:05:09 AM

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,

Elizabeth Miller
President/CEO
Miller Mechanical Services, Inc.
51 Walnut Street
Glens Falls, NY 12801
Office: (518) 792-0430 ext. 3301
www.millermech.com

From: Allen Harbor, SD - Wilson, Pamela
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 2:28:27 PM

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,

Pamela Wilson

Bluff Head Road

Huletts Landing, NY

From: John Danese
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 11:28:18 AM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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

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

Sincerely,

John Danese
PO Box 1890
Silverthorne, CO 80498
(Formerly residing on Truesdale Hill Rd in Town of Lake George)

From:	brian beattie
To:	APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject:	RE: APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 10:02:43 AM

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. As is the case with many of the folks around Lake George, my family gets our drinking water directly from the lake.

I remember the extensive use of DDT around the lake in the late 60's, and the many years it has taken our fragile ecosystem to heal itself from that mistake. I am a supporter of the Lake George Association and their science guided approach to maintaining the lake's integrity. Please continue the slow steady hand harvesting program, as it is working.

Thank you
Brian

From: Robert Brennan
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 11:33:59 AM

Dear Mr. Walrath:

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

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

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

Sincerely,
Rob Brennan

71 Baker Street
Lanesborough, MA 01237

From: Anthony Jackson
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 1:55:16 PM

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.

We feel that there are too many unknowns associated with the use of this and other herbicides in terms of ecologic effects on aquatic plants and fish and potential ill-health effects, both short and long-term, especially to our young grandchildren who stay with us during the summer who swim in and drink water from the lake.

Please deny this application. Thank you.

Sincerely,

NAME Marci and Anthony Jackson

ADDRESS 4 Highview Road, Lake George, NY 12845

Members, Lake George Assn. and Dunham Bay Assn.

From: amanda5744
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:22:57 AM

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.

Amanda Hauburger

Lake George Village Resident

Sent from the all new AOL app for iOS

From:	Michael Maginnis
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	RE: APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 7:39:43 AM

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,

Michael Maginnis

5199 Bluff Head Rd

Huletts Landing, NY 12841

From: Patrick OBrien
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:18:16 AM

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 on human health, water quality, and native plants and animals, as well as the potential for harmful algal blooms arising from increased nutrient loading as a result of herbicide use.

As the Park Commission itself proudly attests, they and their partners — with important financial assistance from New York State — have made great strides in controlling milfoil through an aggressive and safe hand-harvesting program. I believe this is the proper approach, and hope the

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

Sincerely,

Patrick OBrien

6058 Lakeside Way

Huletts Landing NY, 12841

From:	Gavin Rodgers
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	RE: APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 9:46:55 AM

Dear Mr. Walrath:

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

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

Gavin Rodgers

4006 Eichler Way

Huletts Landing NY 12841

From: Tony G
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 1:34:13 AM

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,

Tony Groton

Bolting Landing Resident

From: MARIE PORTELA
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:31:12 AM

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,

Marie Portela

31 Casino Street - 2Q

Freeport, NY 11520

From: Wayne Smith
To: APA Regulatory Programs Comments
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:46:05 AM

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.

I like many lake side residents use the lake water for a domestic supply so it is natural that I am opposed to puttingm chemicals into the lake.

Sincerely,

Wayne M. Smith

PO Box 40

Huletts Landing, NY 12841

cc:info@lakegeorge association.org

From:	Jerry Stoecker
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	RE: APA Projects 2022-0003 and -0004
Date:	Thursday, March 31, 2022 9:46:29 AM

Dear Mr. Walrath:

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

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

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

Sincerely,

Peter Stoecker

From: J van Rhyn
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:34:54 AM

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,

Jacqueline van Rhyn

1107 Annin St, Philadelphia, PA 19147 and 5577 Bluff Head Road, Huletts Landing, NY 12841

From: Jacqueline van Rhyn
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 3:15:46 PM

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,

Stephanie van Rhyn, 430 Mahogany Walk, Newtown, PA 18940 and 5577 Bluff Head Road, Huletts Landing, NY 12841

From: Tom Connell
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 3:05:52 PM

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 have been an ardent supporter of protecting Lake George for many decades. I have also spent many decades working as a Professional Engineer in the chemical industry and have observed well intentioned projects create untoward consequences. An infamous example is Hooker Chemical burying chemical waste drums in Love Canal. At the time it was thought to be a good idea and it would save money. **The introduction of any chemical herbicide into Lake George could very well result in serious unintended and irreversible consequences.**

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,

Thomas Connell, P.E.

5146 Bayview Way

Putnam Station, NY 12861

From: Brianne McGuinness
To: APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject: RE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 10:16:19 AM

Dear Mr. Walrath:

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

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,

Brianne McGuinness

25 Huntington Ave

Lynbrook, NY 11563

From:	Cheryl Baldwin
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	RE: APA Projects 2022-003 and 2022-0004
Date:	Wednesday, March 30, 2022 10:02:03 PM

Leigh R. Walrath

Adirondack Park Agency

P.O. Box 99

Ray Brook, NY 12977

RE:APA Projects 2022-0003 and 2022-0004

Dear Mr. Walrath:

We respectfully ask the Adirondack Park Agency to deny the Lake George Park Commission's current application for the use of the chemical herbicide 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.

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

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

Most sincerely,

William and Cheryl Baldwin, 24 Joshua Rock Road, Dunhams Bay, Lake George, New York 12845/ 7728 Dryer Road, Victor, New York 14564 Phone: 585-924-4554

From: Ed Scheiber
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: REFERENCE: APA Projects 2022-0003 and -0004
Date: Thursday, March 31, 2022 9:14:37 AM

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

Dear Mr. Walrath:

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

This is an important issue and given the research that has been done to date, it appears that it should not be introduced into Lake George!!!

I appreciate your evaluation of this issue and deny the application!!!

Sincerely, Edmund M Scheiber, Jr, Hemlock Point Association

51 Hemlock Point Road

Bolton Landing, NY 12814

From: Kevin Larkin Angioli
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Regarding APA Proejects 2022-0003 and -0004: Do Not Use ProcellaCOR in Lake George
Date: Thursday, March 31, 2022 12:31:08 PM

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. It's also a place of great importance to me and my family, who have gone and restored ourselves in its clean purifying waters nearly every year of our lives. My own sons are looking forward to returning this year, and are asking if the fish will be safe, a question we cannot answer at this time because we simply do not know enough about this product. 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. I'm sure you're aware just how bad harmful algal blooms can be. It doesn't seem like a necessary risk given the problem is already being handled, quite literally.

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

Sincerely,

Kevin Larkin Angioli, 40, and his sons Finch, 8, and Sheppard, 6

6 Linden Place

Warwick, NY 10990

From:	Richard Young
To:	APA Regulatory Programs Comments
Cc:	info@lakegeorgeassociation.org
Subject:	Respectful Request For 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 in Lake George.
Date:	Thursday, March 31, 2022 10:19:29 AM

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 request the Adirondack Park Agency to ***deny*** the Lake George Park Commission's current application for the use of the chemical herbicide ProcellaCOR^{TM} 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.

Those of us who love Lake George and have lived on it our entire lives ask you to continue to ***protect*** our treasured Lake George from the chemical herbicide ProcellaCOR^{TM,} by ***denying*** the Lake George Park Commission's current application for it.

Sincerely,

Richard H. Young
9 Fielding Lane PO Box 242

Cleverdale, NY 12820

From: Allen Fishner
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Say NO to herbicides in Lake George
Date: Thursday, March 31, 2022 11:48:25 AM

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,

Allen Fishner
Bolton Landing

From: jdunham1@nycap.rr.com
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Say NO to PorcellaCOR (TM)
Date: Wednesday, March 30, 2022 8:01:12 PM

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

RE: APA Project 2020-0004

Dear Mr. Walrath:

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

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

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

Sincerely,

James Dunham

2210 Mountainview Way, Kattskill Bay, NY 12844

From: Louise Rourke
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: Say NO to Proposed Use of Herbicide in Lake George
Date: Wednesday, March 30, 2022 10:11:30 PM

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,

Louise Rourke
98 Tiroga Beach Lane
Ticonderoga, NY 12883

From: sarapmcmahon@aol.com
To: APA Regulatory Programs Comments; info@lakegeorgeassociation.org
Subject: Use of Chemical Herbicide
Date: Thursday, March 31, 2022 2:13:07 PM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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Sincerely

Sara McMahon

18141 Lagos Way

Naples, FL 34110

(3 Lookout Mountain Rd.

Lake George, NY 12845)

From: Cynthia Ferguson
To: APA Regulatory Programs Comments
Cc: info@lakegeorgeassociation.org
Subject: use of ProcellaCORtm
Date: Wednesday, March 30, 2022 9:54:00 PM

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

RE: APA Projects 2022-0003 and -0004

Dear Mr. Walrath:

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

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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,

Cynthia K Ferguson

3 Oahu Island

Bolton Landing, NY 12814

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March 31, 2022

Mr. Leigh Walrath
Adirondack Park Agency
P.O. Box 99 Route 86
Ray Brook, NY 12977

RE: Lake George Park Commission – Applications for usage of ProcellaCOR Herbicide in two demonstration test Bays:
Sheep Meadow Bay, Hague (T) - APA Project No. 2022-0003
Blairs Bay, Hague (T) – APA Project No. 2022-0004

The Lake George Association ("LGA") and the Lake George Waterkeeper ("Waterkeeper") have significant environmental and ecological concerns regarding the two proposed Applications submitted by the Lake George Park Commission to apply the aquatic herbicide ProcellaCOR™ EC in the two bays identified above. We understand the importance of invasive species management as we have been partners with the Lake George Park Commission ("Commission") for over 35 years working to control EWM and have spent over $1.1 million since 2013 on this effort. However, these projects seek to introduce a radical and high risk change in the current management approach, thereby setting a dangerous precedent for the future ecology of Lake George and possibly many other high quality and uniquely regulated waterbodies in the Adirondacks.

Consequently, the LGA and the Waterkeeper cannot support the use of ProcellaCOR, be it for testing purposes or otherwise, or any other aquatic herbicides in Lake George, until there are peer reviewed scientific studies demonstrating that ProcellaCOR's effect upon the ecology of Lake George is negligible or nonexistent. As we will document herein, there are too many potential negative short- and long-term impacts and uncertainties surrounding these Applications for herbicide use; uncertainties that can cause harm to this exceptional natural resource. Therefore these two Applications must be denied or, in the alternative, tabled indefinitely for time to provide adequate additional information intended to lead to a fully informed final Decision by the Adirondack Park Agency ("APA"). Obviously, the LGPC as Applicant, can always withdraw its Applications and work with other interested parties to establish a Long Term EWM Management Plan that is both safe and highly effective.

The following comments are not intended to be in any order of priority, nor are they intended to be all inclusive given the unfortunate short period of time established for filing these comments based upon information which, otherwise, largely supports a finding of "Incomplete Application". [1]

[1] Agency staff and members need to know that the LGPC, as Applicant, posted and circulated a "Request for Proposals" dated March 2, 2022 (1). which Is a mere 29 days from close of the APA public comment period. The

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I. REQUEST FOR PROCELLA COR USAGE IN LAKE GEORGE – APPLICATION INADEQUACIES REGARDING THE SCIENCE

A. The circulation and hydrodynamics of Lake George will result in the wide-spread distribution of the herbicide well beyond the cited dilution zone in the current Applications.

The distribution of ProcellaCOR will be much greater than represented in both Project Applications and will extend well beyond the proposed dilution zone within the indicated 48 hours, which is less than the expected degradation half-life, which will be discussed in Item C., supra. Given this rapid distribution of the herbicide away from the treatment area, we question the efficacy of the treatment on the intended milfoil beds and the unintended effects on native plants, such as *Myriophylllum alterniflorum*, *Myriophyllum tenellum*, and low-impact plants as listed by SePro in the unaccounted dilution area. This information must be provided in the current Application submissions.

This conclusion is demonstrated by circulation models prepared by The Jefferson Project at Lake George ("Jefferson Project"). Figure 1 (attached) shows the initial hydrodynamic particle transport computer model with a sequence of time lapse images for the Sheep Meadow Bay treatment area. The model shows how far a particle can travel within 48 hours with the distribution well outside the treatment area, mostly extending north as well as across to the western shore of Lake George. This was based on conditions including forcing from 2021 historical precision weather seasonal data using winds from the west with mean speeds of approximately 5.6 m/s, 3.7 m/s, and 2.7 m/s (12.5, 8.3, and 6.0 mph, respectively) for three consecutive days. The simulation depicts particle positions at 12-hour intervals after particles are released at the proposed experimental site form the day corresponding to the 3.7 m/s (8.3 mph) winds. This model does not include chemical effects (dispersion, dilution) nor stream flows in/near the area.

Figure 2 (also attached) shows the initial hydrodynamic particle transport computer model with a sequence of time lapse images for the Blairs Bay experimental treatment area. The model shows how far a particle can travel within 48 hours with the distribution well outside the treatment area, mostly extending north around Anthony's Nose and into the main section of the lake. This was

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two herbicide usage Applications were deemed "Complete" by Agency staff on March 4, 2022. Finally, this "Request for Proposals" by the LGPC states in relevant part: **"All necessary herbicide treatment permits from** the NYS Department of Environmental Conservation and the **NYS Adirondack Park Agency have been received by the Commission** and will be made available to the selected contractors", and (2). "Proposal submission (due by April 15, 2022)." Besides the erroneous text in statement #1, statement #2 appears most presumptuous given the next Agency monthly meeting after the close of public comments as April 14 – 15, 2022. Therefore, the Agency's first possible date as of now to make a decision on these two Applications **is the same date** the LGPC posted for Bid Proposals by herbicide applicators to be submitted. It is respectfully submitted that this is a legal flaw in some of the earliest most basic steps allowing for dissemination of public information, comment, and project review participation. (emphasis added)

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based on conditions including forcing from 2021 historical precision weather seasonal data using winds from the west with mean speeds of approximately 2.5 m/s, 1.5 m/s , and 2.3 m/s (5.6, 3.4, and 5.1 mph, respectively) for three consecutive days. The simulation depicts particle positions at 12-hour intervals after particles are released at the proposed experimental site form the day corresponding to the 1.5 m/s (3,4 mph) winds. This model does not include chemical effects (dispersion, dilution) nor stream flows in/near the area.

Figures 1 and 2 show the potential distribution of the chemical herbicide through Lake George and are meant to demonstrate the strong and complex hydrodynamics of Lake George, which is not at all depicted or considered in the Applications. As will be discussed in Item B, below, this model demonstrates that Lake George is not a slow moving, quiet water body and, consequently, the efficacy of the chemical herbicide will be reduced. These Figures are not intended to reflect the potential impacts of the chemical herbicide but the extent that the chemical could travel under historical conditions. Obviously, drift of the chemical well beyond the experimental treatment area is a factor that must be considered by the Agency and is not properly represented in these Applications.

One example of drift of ProcellaCOR was experienced in the Minerva Lake study, which is often referenced as a model demonstration project for this herbicide, as is the case in the LGPC Applications before this Agency. The test area in Minerva Lake was approved for 41-acres but it was discovered that milfoil was eradicated in the entire 78-acre lake, demonstrating the aggressive drift of the herbicide in a small lake. This drift pattern will be significantly greater in Lake George, especially when the proposed applied dosage concentration will be twice that used in Minerva Lake. This misleading information must be fully assessed in the review by the Agency of these Applications; once again, a review that lacks submissions of adequate information to make informed final Decisions.

B. The effectiveness of the proposed use of ProcellaCOR in Lake George will be greatly reduced by the strong currents and hydrodynamics of Lake George and is not a sensible management choice, especially considering the still unknown risks of this herbicide.

The extensively studied hydrodynamics and bathymetry of Lake George will reduce the efficacy of ProcellaCOR treatments and, consequently, reduce the effectiveness of milfoil treatment. The following is a portion of the introductory description of ProcellaCOR on the specimen label:

> "A selective systemic herbicide for management of freshwater aquatic vegetation in slow moving/quiescent waters with little or no continuous outflow, …" [2] (emphasis added)

[2] Specimen Label for ProcellaCOR™EC (EPA Reg No. 67690-80). Produced by SePro Corporation, 11550 North Meridian Street, Suite 600, Carmel, IN 46032. 2018.

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As documented by the previously referenced circulation models, Lake George is anything but a slow moving/quiescent water.

Similarly, the use of ProcellaCOR also creates such a reduction in effectiveness within a certain lake, such as Lake George, where there are more dynamic conditions. Consider the following:

> "While low-rate, static treatments are often used in targeting invasive aquatic species, hydrodynamic processes can greatly alter CET (concentration and exposure time) and therefore, herbicide treatment efficacy. Static applications such as whole-lake treatment have the potential to lack selectivity, depending on the initial application rate." [3]

It is also noted that the hydrodynamics and circulation of the two bays will be impacted by streams tributary to the respective bays – Sucker Brook (Blair Bay) and an unknown tributary (Sheep Meadow Bay). These stream flows will result in inflow to each bay creating a circulation pattern similar to an outflow into the main part of the lake and along the adjacent shorelines.

There is a concern that this proposed herbicide management approach will not be successful in meeting the intended goals of leading to eradication in the experimental areas. In conversation with the manufacturer, it was indicated that the herbicide will bind to organics as it sinks and distributes. This poses concern for the efficacy of treatment in Blairs Bay considering the humic material entering the bay from Sucker Brook. In addition, stream studies by The FUND for Lake George[4] and The Jefferson Project [5] show high quantities of organic matter and nutrients flowing into Blairs Bay, likely from the successional wetlands and beaver pond upstream from the bay. . Again, it is respectfully submitted that more definitive information on this subject matter needs to be submitted for a fully informed Decision by the Agency on these Applications.

C. The degradation of ProcellaCOR can potentially be very slow and what it degrades into remains longer than the primary compound and may be as toxic. This will result in the chemical being in the environment a much longer period of time than proposed.

The specimen label for ProcellaCOR states that the main ingredient (florpyrauxifen-benzyl) has a 111 day half-life via hydrolysis, which is the chemical breakdown of a compound with reaction to water. Therefore, the biodegradability could be very slow in the environment and fail to pass

[3] Beets, Jen, Heliman, H. and Netherland, M. 2019. Large-scale mesocosm evaluation of florapyrauxifen-benzyl, a novel arylpicolinate herbicide, on Eurasian and hybrid watermilfoil and seven native submersed plants. J. Aquat. Plant Manage. 57: 49-55.

[4] The Fund for Lake George. 2019. Modified Sampling of Selected Lake George Tributaries to Enhance the Knowledge of Watershed Runoff Characteristics Following a Winter of Reduced Snowpack and Application of Highway Deicing Products.

[5] Harrison, J. W. et al. 2021. Prediction of stream nitrogen and phosphorus concentrations from high-frequency sensors using Random Forests Regression. Sci. Of the Total Env. 763 (143005).

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OECD/EEC tests for readily biodegradability as well as failing the 10-day window of allotted time.[6]

The company representative stated that hydrolysis is not the typical mode of degradation, but the product shows very slow biodegradation; there appears to be a reliance on photodegradation. However, this statement is not consistent with their own Safety Data Sheet. This inconsistency needs clarification in the form of additional Application materials.

As a result of the above, ProcellaCOR (with florauxifen-benzyl as its main ingredient) could potentially remain within the lake for several months under certain circumstances, albeit diluted, and the company cannot accurately predict the overall impacts of the product under these circumstances, chemically, temporally or spatially.

Another problem within this same area of concern is that the compounds ProcellaCOR degrades into are not benign and can be toxic; although low in sediments; consider the following:

> "Florpyrauxifen-benzyl transforms into several degradates while XDE-848 acid, XDE-848 hydroxy acid, and XDE-848 benzyl hydroxy are the major degrades. **Major degradates are expected to have the same or lesser toxicity and hazard concern similar to florpyrauxifen-benzyl. These major degradates persist longer than the parent compound;** however, potential accumulations of the total toxic residues in sediment for extended periods of time appears to be low, since the degradates have low mobility than the parent compound. USEPA does not have higher hazard concern from these degradates than the parent for drinking water, aquatic life or terrestrial life." [7] (emphasis added)

Therefore, although the main ingredient degrades into degradates with lower potential accumulations over time, that does not necessarily reduce the potential of toxicity along with these compounds potentially staying in the environment for longer periods of time. In addition, despite the persistent claims of lack of hazards, EPA's approval of herbicides for general use does not mean the chemicals are harmless. [8] This is yet anther topic of concern that the authors of these comments advocate for far more study and analyses before approving these LGPC Application submissions.

D. There are health concerns with the proposed use of ProcellaCOR which are not readily identified or analyzed in these Application submissions.

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[6] ProcellaCOR Date Safety Sheet. Produced by SePro Corporation, 11550 North Meridian Street, Suite 600, Carmel, IN 46032. https://sepro.com/Documents/ProcellaCOR_SC--SDS.pdf

[7] Florpyrauxifen-benzyl – New Active Ingredient Review (CAS 1390661-72-9: EPA PC Code 030093) Minnesota Department of Agriculture. May 2018.

[8] Engel, Sandy. 1990. Ecosystem Responses to Growth and Control of Submerged Macrophytes: A Literature Review. Technical Bulletin No. 170. Wisconsin Department of Natural Resources, Box 7921, Madison, WI 53707.

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There are claims supported in the LGPC Applications that the impact on public health "appears to be minimal"[9] and there are no restrictions on swimming, fishing or potable/domestic water use once the use of the herbicide is complete.[10]

However, ProcellaCOR with its active substance florpyrauxifen-benzyl was not approved for use by the European Food Safety Authority ("EFSA") citing concerns that there is not enough information available to perform a full assessment regarding reproductive harm. Consider this statement by the EFSA:

> "Florpyrauxifen-benzyl is not classified or proposed to be classified as carcinogenic or toxic for reproduction category 2, on the basis, the conditions of the interim provisions of Annex II, Point 3.6.5 of Regulation (EC) No 1107/2009 concerning human health for the consideration of ED properties are not met. No evidence of endocrine or reproductive toxicity were seen in the whole toxicology data package **except for reduced ovary weights in the 90-day mice study and mammary gland tumors in males in the 2-year rat study;** in addition, it was questioned whether the two-generation reproductive toxicity study was performed with sufficiently high doses allowing to identify a reproductive toxicity hazard. **Therefore, an endocrine-mediated mode of action could not be ruled out and the endocrine disrupting potential of the active substance could not be finalized."** [11]

It has been reported that impacts from florpyrauxifen-benzyl to ground water as a contaminant are listed as "Insufficiently Studied"; as a carcinogen, it is listed "Insufficiently Studied" and, regarding development or reproductive toxicant is listed as "Insufficiently Studied".[12] Evidence of health effects associated with cancer are posted as "Suggestive Evidence" and endocrine disruption as "Suggestive Evidence" are also reported.[13]There are no drinking water restrictions from the USEPA with regard to this herbicide and Amy Smagula of the New Hampshire Department of Natural Resources has reported that ProcellaCOR has been used in several drinking water supply lakes, but despite the EPA's determination, regulators and applicators alike were hesitant to apply this herbicide within ½ mile of any water intake pipe indicating concern for human intake.[14]

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[9] New York State Department of Environmental Conservation correspondence to Dr. Laurent Mezin, SePro Corporation, 11550 N. Meridian Street, Suite 600, Carmel, IN 46032-4565, February 22, 2019.
[10] Final Registration Decision on the New Active Ingredient Florpyrauxifen-benzyl. United States Environmental Protection Agency. September 8, 2017.
[11] Conclusion on Pesticides Peer Review – Peer Review of the pesticide risk assessment of the active substance florpyrauxifen-benzyl. European Food Safety Authority (EFSA). June 29, 2018 doi: 10.2903/j.efsa.2018.5378.
[12] www.pesticideinfo.org/chemical/PR138870.
[13] www.beyondpesticides.org/resources/pesticide-gateway?pesticideid=402.
[14] Personal statement during meeting between Lake George Park Commission and Lake George Association. March 23, 2022.

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It is still believed that many lake front residents take their drinking water from Lake George with little treatment. The use of this herbicide should not be approved for anywhere in Lake George due to the current uncertainty of human health impacts and given the more cautious approach taken by the European Food Safety Authority. It should also be noted that the "EPA approval for herbicides is for general use thus does not mean that the chemicals are harmless." [15]

E. Herbicide treatment of Eurasian watermilfoil will result in significant nutrient loading from decomposing plants, especially phosphorus, that will cause algae growth and increase the potential for Harmful Algae Blooms.

Lake George is an oligotrophic lake with low nutrient levels and low production. Therefore, it is much more sensitive to changes and increases in nutrient levels that can produce benthic algae blooms or, even worse, feed cyanobacteria resulting in Harmful Algal Blooms ("HABs"). In nutrient-poor lakes (i.e., mesotrophic and oligotrophic lakes), macrophyte decomposition and mobilization of nitrogen and phosphorus into the water column may have a greater influence on algal growth than in eutrophic (i.e., overfertilized) lakes due to mobilization of nutrients that limit algal growth.[16]

On treating watermilfoil with herbicide, rapid phosphorus release can be expected and this phosphorus can either be utilized in further biomass production or be sorbed by the sediment.[17]

It is incorrect to assume as the proposed ProcellaCOR LGPC Applications do, that if EWM is left untreated, the nutrients will enter the water column with the same shock loading as herbicide treatment. The leaves of water milfoil slough, thereby continually releasing nutrients slowly to the water column to be taken up by the plant and these nutrients first provide for canopy development rather than fueling phytoplankton blooms.[18] Herbicide treatment, however, flushes nutrients into the water where they can more likely stimulate algal blooms.[19]

It is incorrect to claim that nutrient loading from herbicide treatment will not differ from natural seasonal decomposition of EWM in the lake. The nutrient loading from an herbicide treatment will occur over a two-week period during the early summer when there is limited competition for the nutrients which promote algae growth. Natural cenescence of EWM occurs over a longer

[15] Engel, Sandy. 1990. Ecosystem Responses to Growth and Control of Submerged Macrophytes: A Literature Review. Technical Bulletin No. 170. Wisconsin Department of Natural Resources, Box 7921, Madison, WI 53707.
[16] Getsinger, Kurt, Poovey, A., James, W., Stewart, R., Grodowitz, M., Maceina, M. and Newman, R. September 2002. Management of Eurasian Watermilfoil in Houghton Lake, Michigan: Workshop Study. ERDC/EL TR-02-24. Unioted States Army Corps of Engineers Engineer Research and Development Center, Washington DC 02314.
[17] Nichols, D.S., Keeney, D.R. Nitrogen and phosphorus release from decaying water milfoil. *Hydrobiologia* **42,** 509–525 (1973). https://doi.org/10.1007/BF00047023
[18] Engel, Sandy. 1990. Ecosystem Responses to Growth and Control of Submerged Macrophytes: A Literature Review. Technical Bulletin No. 170. Wisconsin Department of Natural Resources, Box 7921, Madison, WI 53707.
[19] Morris, K and Jarman, R. 1981. Evaluation of water quality during herbicide applications to Kerr Lake, OK. J. Aquat. Plant Manage. 19: 15-18.

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period and does not result in a shock loading of nutrients to the water column, especially in early June. These conclusions and scientific findings have to be rectified in the current, inadequate LGPC Applications for the proposed ProcellaCOR test areas.

II. LGPC PROCELLA COR APPLICATIONS AS INADEQUATE BASED ON AGENCY REQUIREMENTS AND PRECEDENT

F. The Project Applications are incomplete as they fail to meet the Adirondack Park Agency's ("APA") requirements for plant survey and provide misleading information in that regard.

(i). These Application submissions are not compliant with the APA's SIR ("Specific Incompletion Requirements") for aquatic herbicides as detailed in the following:

- The Applications fail to provide a point-intercept/grid method i.e., a grid must be established such that "survey locations capture variations in depth and micro-habitat types which may occur within and adjacent to the survey area." [20] In point-intercept surveys, survey sites are regularly spaced, defined locations to avoid subjective selection in the field. While the report claims that this method was used, the maps fail to demonstrate these requirements.

- The surveys do not have 36 vegetated points for either bay test area as required by the APA's SIR and sites containing no vegetation cannot be counted toward the minimum number of sites. Sheep Meadow Bay has 40 points, but only 33 points with vegetation, which falls short of the required 36. Blairs Bay has 38 points, but only 32 vegetated points. In addition, the APA's SIR requires 12 vegetated points within the treatment area and 24 outside the treatment area. Blairs Bay has less than 24 vegetated points outside the treatment area. Again, this falls short of the Agency's requirements.

- While the rake-toss methodology is a requirement of the APA in these types of project proposals, we question whether it is appropriate for Lake George considering the depth at which macrophytes can grow; namely, typically as deep, if not deeper, than the 10m rope called for in the methodology.

(ii). The submitted surveys fail to provide adequate coverage and the Report material is misleading as demonstrated by the following:

[20] Madsen, John. 1999. Point Intercept and Line Intercept Methods for Aquatic Plant Management. US Department of Agriculture, Aquatic Plant Control Technical Note MI-02.

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- The Point-Intercept Method ("PIM") is used for pre- and post-management as a regulated manner for estimating macrophyte distribution and abundance throughout the potentially impacted area. By ignoring this protocol when determining these Applications as complete, Agency staff accepted inadequate surveys.

- Survey depths are inadequate, and the littoral zone is only partially covered by clustered points. The deepest survey points are on the outskirts of each bay, rather than in any one or more transect within a milfoil bed/treatment area. This creates inherent inaccuracies for survey points where plants *could* or *should* be found based on personal or community knowledge.

- The Reports accompanying each Application contain contradicting material, such as: The use of the PIM to "determine the extent of growth of aquatic plants within an area of concern". The areas cover the entire littoral zone, out to at least 30' for each bay; where beds of *Nitella* dominate the macrophyte community and are deemed integral to the water quality of Lake George. While few points may be present within the survey methodology, the survey points are not consistent or deep enough to determine the extent of *Nitella* growth.

- The APA's SIR for this subject matter also requires information within 0.3 mi. from a treatment area, yet the outskirts of each of these proposed test bays were sampled primarily at deep locations, thereby omitting shallow vegetation growth. Yet, another set of Application deficiencies.

- The survey points for each proposed test bay are not shallow enough to adequately determine growth of *Subularia aquatica* or the adequate extent of growth of other shallow-nature, NY Natural Heritage protected, or watched macrophytes [21];

- The Report accompanying each proposed test bay states: "areas of the wave break zone within depths of 1-4 ft. mostly consisted of bottom sediments of sand with little organic materials; areas within the 0.3 mile radius of the proposed treatment areas were lacking in aquatic macrophytes due to benthic bedrock or steep drop offs not conducive...for plant growth". This is misleading as it makes the bay sound barren, when the prospective bay surveys show the complete opposite, namely, abundant vegetation and good diversity;

- Considering the diversity of macrophytes in Lake George, two or three rake tosses should have been completed at each sample site for the use of the PIM, or, a snorkel/dive transect survey should have been included to capture the low profile or small macrophytes that are not easily captured by a rake toss such as *Subularia*

[21] Young, Stephen. 2021. New York Rare Plants Status Lists. New York Natural Heritage Program. NYNHP.org

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aquatica, Sagittaria graminea, Lobelia dortmanna, or Elatine minima all of which are identified in Ogden's 1976 Field Guide to Aquatic Plants of Lake George[22], but are not represented in these surveys.

- In the multiple site visits by the LGPC and others since 2021, it has been shown that the dense Eurasian watermilfoil bed in Sheep Meadow Bay only occurs as a small bed in the northeastern portion of that bay. The survey map does not denote this. This gives rise to the question: was the treatment zone proposed for the entire southeastern shoreline?

(iii). The Applications contain improper dilution determination/calculation:

- The herbicide application volumes and treatment concentrations are skewed for both proposed test bays since this information appears based on depths acquired from irregular depth sampling rather than weighted for contours of a given bay and/or treatment area;

- Residue sampling only accounts for 60ac in Blairs Bay and 40ac in Sheep Meadow Bay with no adjustment for the stream flows entering each bay. Sucker Brook is one of the 14 primary tributaries entering Lake George, which is located in Blairs Bay. There is evidence of two unregulated tributaries entering Sheep Meadow Bay, one in the northeastern corner of the bay and one entering in the middle of the proposed treatment area. Adjustments for tributary flow to each proposed bay area are lacking and therefore provide incomplete and inaccurate information concerning residue sampling.

- The Jefferson Project Circulation model, which models the lake circulation based on various wind patterns and lake hydrodynamics, shows that even in low wind scenarios, ProcellaCOR use will move outside of those acreages within 24-48 hours. The unaccounted stream flows will likely influence this movement further. Again, we respectfully submit, that these Applications are missing this necessary information for Decision-making.

(iv). Other items and materials missing from these Applications:

- Demonstration bays have high potential for reinfestation from upcurrent or nearby milfoil growth. [Source: personal conversation with Amy Smagula, Limnologist for New Hampshire Department of Environmental Services, who has strategically treated infestations upstream to downstream.] Known infestations are located in

[22] Ogden, Eugene C. 1976. Field Guide to the aquatic plants of Lake George, New York. Book. Albany: University of the State of New York, The State Education Department.

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Eichlerville Bay and Sunset Bay, which lie directly to the south of Sheep Meadow Bay.

- Both Applications are missing adequate post-treatment measures to prevent reinfestation from homeowner activities and local boat traffic (anchoring, fishing, propeller cleanout).

- Finally, the Blairs Bay Application should include details on how boats are inspected for aquatic invasives at the Glenburnie launch to prevent reinfestation.

III. THE NEED FOR A LONG TERM EURASIAN WATERMILFOIL MANAGEMENT PLAN

G. Lake George lacks a mechanism for comprehensive management decisions based on the lakewide control of EWM, such as an integrated long-term Eurasian Watermilfoil Management Plan, to guide control measures based on goals, effectiveness of current management practices and potential impacts. There is also a concern that current management practices have not been applied to the two proposed test bays for several years and should be applied again before a high-risk, in-lake chemical test is attempted.

There currently is not an integrated Long-Term Management Plan for invasive species to guide and direct management decisions for Lake George. Such a Plan would describe historic and current infestations, identify short- and long-term control goals, minimize adverse effects of milfoil management strategies to non-target species, and recommend milfoil control actions that meet the outlined goals and control practices successfully used over time. Annual Reports on harvesting and site management are currently produced but there has been no tracking of effectiveness or complete mapping of the EWM infestation. Such a site management plan is necessary to evaluate the effectiveness of current practice and define conditions (i.e. EWM density, site conditions, etc.) that would trigger a change in current practices if comprehensively undertaken by well-organized and funded multi-scientific interests committed to the protection and preservation of this unique waterbody.

The current approach of diver assisted suction harvesting (DASH) has been described as a success, namely:

- "Within the past five years, milfoil control has been taken up much more aggressively by the project partners in an effort to eliminate all dense milfoil beds in Lake George for the first time since its discovery in the 1980's. Thanks to recent additional funding from the NYS Department of State through Warren County, this goal of eliminating all dense beds seems closer than ever. By year 2021, with all partners working together, we believe that the days of dense milfoil beds in Lake George will be a thing of the past". [23]

[23] www.lgpc.ny.gov/invasive-species-management

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- LGPC staff have stated: "All known dense beds harvested in 2021 (except Glenburnie/Sheep Meadow Bay)" [24]

- "Our partners in Albany are very supportive of our model for milfoil management – reducing dense beds to a level where milfoil has been all but eliminated and where routine maintenance alone is necessary. The Governor is recommending that the program be funded at a level – at least for the short term – that will enable us to achieve our goals." [25]

The two bays proposed for ProcellaCOR treatment have been monitored annually and registered as known milfoil sites since the early 1990s according to historical annual reports. Over the years, there has been varying levels of annual management from heavy harvesting (Blairs Bay (Site 117) in 2016 where 14,375 pounds were removed and Sheep Meadow Bay (Site 103) in 2012 where 4,291 plants were harvested) to no management at Blair Bay since 2017 and none at Sheep Meadow Bay since 2015.[This is despite the fact that the LGPC has received the most funding in the history of the milfoil management program reaching a level of $1,342 million since 2019.] In addition, it has been reported that State funding for 2022 for continued plant harvesting is projected at $500,000. [26] The APA needs to ask the question: why alter the current successful DASH management program when there are only two bays with identified dense beds remaining in Lake George and, instead, implement an experiment with a risky chemical herbicide?

H. There are significant concerns about the impacts to native macrophytes and organisms given the lack of overall testing that has been performed for this herbicide product, in addition to the limited time this product has been registered.

As stated by the USEPA, "as would be expected for an herbicide, florpyrauxifen-benzyl is toxic to plants and there are some risks of concern for both terrestrial and aquatic plant species." [27] It is stated that there is not a significant risk for ecotoxicological impacts from the labeled use of ProcellaCOR and the manufacturer has claimed their tests have been performed in USEPA representative species[28]. However, there are still questions regarding the toxicity and risk to various species as well as the general lack of knowledge to plants and organisms native to Lake George. In this regard, the USEPA stated for proposed aquatic uses:

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[24] PowerPoint presentation by Dave Wick to Lake George Park Commission. November 2021. https://www.youtube.com/watch?v=Jo8h3O6dJVk

[25] Quote from Dave Wick. "Gov. Hochul Asks Legislators for More Money to Combat Aquatic Invasive Species in Lake George", Lake George Mirror. February 2022.

[26] Ibid.

[27] Final Registration Decision on the New Active Ingredient Florpyrauxifen-benzyl. United States Environmental Protection Agency. September 8, 2017.

[28] Jon Gosselin, Technical Specialist with SePro Corporation. Personal statement during meeting between Lake George Park Commission and Lake George Association. March 23, 2022.

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> "the acute risks to freshwater and estuarine/marine fish and invertebrates (water column) slightly exceed the EPA's LOC (with RQs ranging from 0.56 to 3.7). For freshwater benthic invertebrates, the submitted study (*single study*) showed toxicity at all of the levels tested, resulting in uncertainty regarding what level of florpyrauxifen-benzyl residues in the environment would be below the threshold for toxicity. Using the lowest level tested in that study and comparing it to the expected environmental concentration of florpyrauxifen-benzyl, the RQ was below the LOC; however, risk to these organisms cannot be entirely precluded due to the uncertainty regarding what level of florpyrauxifen-benzyl would be non-toxic." [29] (emphasis added)

Other evidence of possible impacts with regard to this subject matter are contained in statements from the NYSDEC where the results from toxicity studies indicated low toxicity to most of the non-target animal species **except benthic invertebrates** and marine aquatic invertebrates. Toxicity data would suggest that there may be a higher risk to non-target aquatic and terrestrial vascular plants from environmental exposure of florpyrauxifen-benzyl [30]

Of greater concern is a statement **by the Wisconsin Department of Natural Resources, namely: "Ecological effects of herbicides are not usually given as much attention before EPA approval."** [31] Consequently, the LGA and the Lake George Waterkeeper have significant concerns about the lack of testing on certain, irreplaceable, plants and organisms native to Lake George by the proposed use of this herbicide; plants and organisms that provide important ecological and nutrient balance to that Lake's ecosystem. As one example of this, the Application materials state *Nitella* has a "Low susceptibility to 4 PDUs/acft ProcellaCOR". But what does "Low" mean? *Nitella* is vital for the nutrient balance of Lake George and absorbs inorganic nutrients directly from the water column. These plants form extensive meadows in the lake and cover an estimated 14% of the north basin.[32] If ProcellaCOR has a negative impact to this native plant, it would also have significant negative impacts on the water quality of Lake George.

The fact remains that ProcellaCOR has not been utilized nearly long enough to know all the potential adverse impacts that could be associated with its use, especially use in such a unique, nationally renowned waterbody as Lake George. As stated by Lynde Lynn Dodd, CERP, research biologist with the United States Army Corp of Engineers: "Considering that this product (florpyrauxifen-benzyl) was just registered a few years ago, **it may take a while for more**

[29] Ibid.
[30] New York State Department of Environmental Conservation correspondence to Dr. Laurent Mezin, SePro Corporation, 11550 N. Meridian Street, Suite 600, Carmel, IN 46032-4565, February 22, 2019.
[31] Engel, Sandy. 1990. Ecosystem Responses to Growth and Control of Submerged Macrophytes: A Literature Review. Technical Bulletin No. 170. Wisconsin Department of Natural Resources, Box 7921, Madison, WI 53707.
[32] Stross, R.G. 1981. The *Nitella* meadow and the eutrophication of Lake George. In: C.W. Boylen (ed.) The Lake George Ecosystem, Vol. I. Lake George Association, Lake George, NY.

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information on toxicity to become available as the use of this product increases." [33] **(emphasis added)**

IV. CONCLUSION

The Lake George Association in partnership with the Lake George Waterkeeper and in consultation with a number of entities including the environmental community, businesses, scientific researchers, educators and local governments have unequivocally concluded that this test Project of a relatively new herbicide (ProcellaCor) in two Bays of the water of Lake George to assist in the eradication of Eurasian Watermilfoil is:

(i) Dangerous, both ecologically and with regard to health, while offering no reasonable alternatives to its proposed usage,

(ii) an inadequately tested chemical composite for this sensitive waterbody,

(iii) unnecessary in its goal and objectives,

(iv) deficient in legitimately establish any emergency conditions prompting its use, and,

(v) wholly lacking assessing viable alternatives to this herbicide usage proposal;

all while inconsistent and at legal odds with procedural and substantive mandates of Adirondack Park Agency Laws and Regulations. Consequently, it is the LGA and Waterkeeper's joint conclusion that the APA can only see these two concurrent Project Proposals ruled upon in one of the following mutually exclusive ways:

1. Determine that there is a reasonable likelihood that both Applications will be disapproved or can be approved only with major modifications because the Projects as proposed may not meet statutory or regulatory criteria or standards. [See APA Act (Executive Law, Article 27) §809.3.d which goes on to say: "The agency shall also consider the general level of public interest in a project (*citing to those considerations in the determination on whether or not to hold a public hearing on an application …"*). No project shall be disapproved without a public hearing first being held thereon."]

OR

2. Determine that more information is needed in order to better complete informational needs for both the Agency and the General Public, thereby assuring a well-informed

[33] Email correspondence with Lynde Lynne Dodd, CERP, United Stated Army Corp of Engineers Aquatic Ecology and Invasive Species Branch.

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final Decision by invoking 9NYCRR 572.8(d) of Agency regulations. [see also APA Act §809.2.b]

In determining whether to conduct a public hearing, the Agency is bound by eight (8) criteria which are mutually exclusive of each other. [see 9NYCRR 580.2(a)] The LGA and the Lake George Waterkeeper submit that five (5) of these criteria are relevant to these two proposals regarding herbicide testing in the two identified Lake George bays:

> "(1) the size and/or complexity of the project, whether measured by cost, area, effect upon municipalities, or uniqueness of resources likely to be affected;
>
> (2) the degree of public interest in the project, as evidenced by communication from the general public, governmental officials or private organizations;
>
> (3) the presence of significant issues relating to the criteria for approval of the project;
>
> (4) the possibility that the project can only be approved if major modifications are made or substantial conditions are imposed;
>
> (5) the possibility that information presented at a public hearing would be of assistance to the agency in its review; …"

The LGA and the Lake George Waterkeeper look forward to working with the Adirondack Park Agency to defend the natural resources of Lake George and its watershed. We also continue to make this same overture to the Lake George Park Commission. Thank you for your consideration.

Sincerely,

Christopher Navitsky, PE
Lake George Waterkeeper

Eric Siy, President
The Lake George Association

cc: <u>all by electronic mailing</u>
Dave Wick, Executive Director LGPC
Joseph Zalewski – Regional Director, NYSDEC Region 5
Thomas A. Ulasewicz, Esq.

LGA Lake George Association

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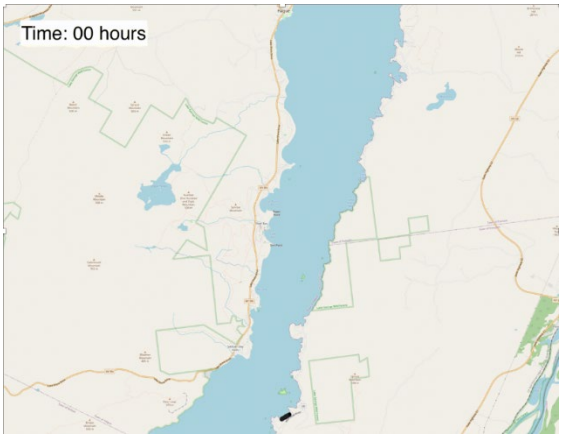
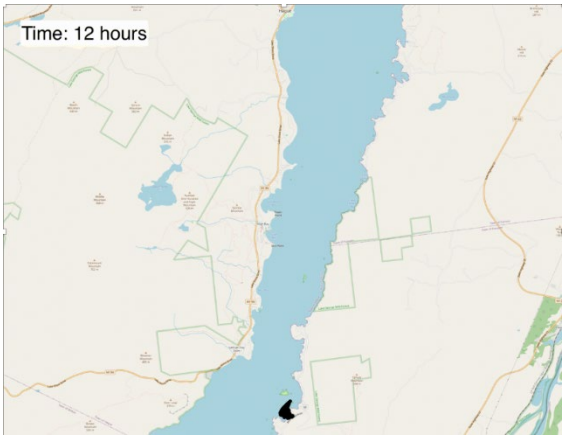
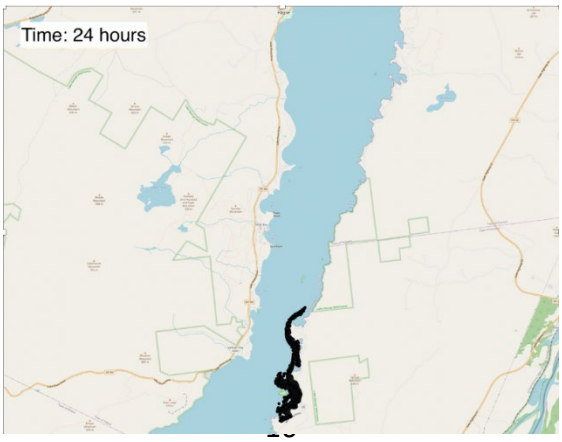
ATTACHMENT NO. 1







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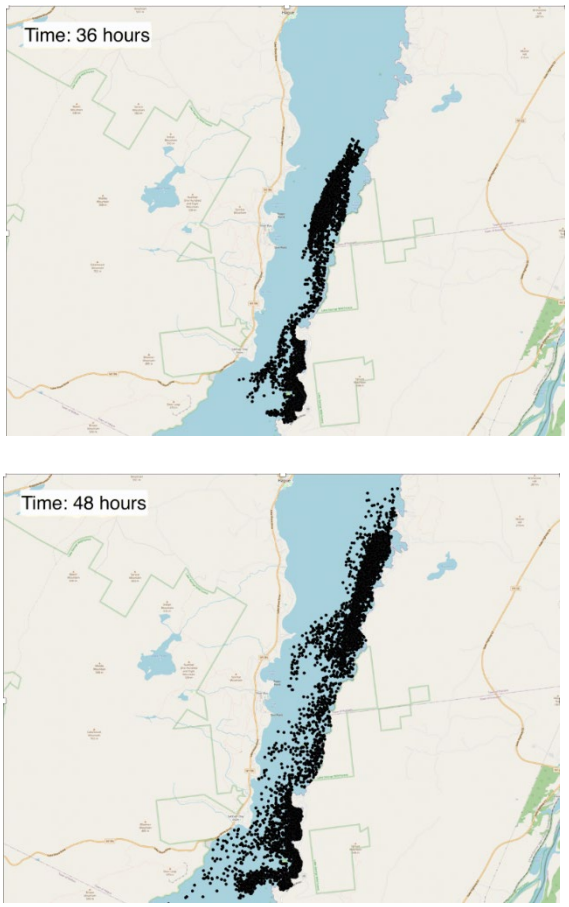

Figure 1.

Figure 1. Initial hydrodynamic particle transport computer model for the Sheep Meadow Bay area. Conditions include forcing from 2021 historical precision weather seasonal data using winds from the west with mean speeds of approximately 5.6 m/s, 3.7 m/s, and 2.7 m/s (12.5, 8.3, and 6.0 mph; respectively) for three consecutive days. The simulation depicts particle positions at 12-hour intervals after particles are released at the proposed experimental site for the day corresponding to the 3.7 m/s (8.3 mph) winds. This model does not include chemical effects (e.g., dispersion) nor stream flows in/near the area.

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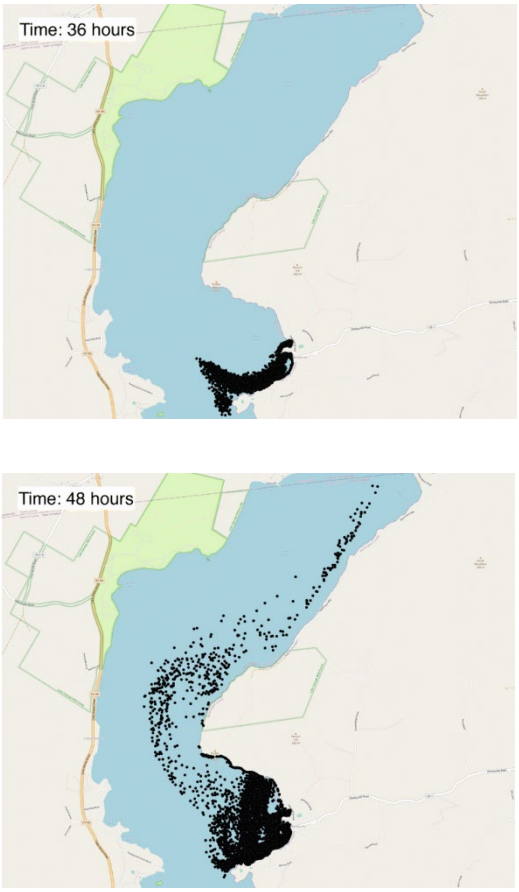

Figure 2.

Figure 2. Initial hydrodynamic particle transport computer model for the Blair Bay area. Conditions include forcing from 2021 historical precision weather seasonal data for relatively weak winds from the south with mean speeds of approximately 2.5 m/s, 1.5 m/s, and 2.3 m/s (5.6, 3.4, and 5.1 mph; respectively) for three consecutive days. The simulation depicts particle positions at 12-hour intervals after particles are released at the proposed experimental site for the day corresponding to the 1.5 m/s (3.4 mph) winds. This model does not include chemical effects (e.g., dispersion) nor stream flows in/near the area.

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The hydrodynamic models were generated using high resolution weather data for forcing with 333 m horizontal resolution. The circulation model was generated using an unstructured grid approach via a customized version of the Stanford Unstructured Nonhydrostatic Terrain-following Adaptive Navier-Stokes Simulator (SUNTANS). The horizontal resolution for the circulation model is approximately 20 m for the embayments and approximately 40 m for the body of the lake. Vertical resolution ranges from 0.7 m at the lake surface to 1.3 m at the bottom of the water column. It should be noted that models are regularly validated using sensor data from multiple locations and for operational model runs using advanced methods and data assimilation techniques.

March 31, 2022

Leigh R. Walrath
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
RPcomments@apa.ny.gov

RE: Public Comments on APA Projects 2022-03/04

Dear Leigh R. Walrath:

Protect the Adirondacks has a number of concerns about the Lake George Park Commission's application to the Adirondack Park Agency (APA Project 2022-03/04) for the use of the aquatic chemical herbicide ProcellaCOR in Lake George. The purpose of this project is to reduce beds of the aquatic invasive plant Eurasian watermilfoil (*Myriophyllum spicatum*). Lake George is one of the great lakes of the Adirondack Park, known for its high water quality and clarity, and the lake underwrites a large part of the greater Warren County economy. Lake George is also famous for its high diversity of aquatic plants. This project appears to be high risk, premature, and poorly planned.

The Lake George community has been treating Eurasian watermilfoil (EWM) with various means for four decades. EWM has spread throughout the entire lake. Of all the treatment methods, hand-harvesting has proven the most successful over the years, especially by utilizing large, trained diving crews over the last 10 years. 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 worked to contain it with regular treatments. This is the reality on Lake George, just as it is in many Adirondack lakes. EWM treatment is a fact of life that must be continued year after year.

Given the learned experience on Lake George about what is effective treatment and what is not, lessons learned hard over the decades, we

question to decision to abandon a EWM control practice that has yielded positive results and is safe.

ProcellaCOR is poorly suited for complex, dynamic Lake George water currents and patterns: The aquatic herbicide proposed for use by the Park Commission is ProcellaCOR. This chemical appears best suited for small lakes and ponds where the dosage can be controlled and the treatment area is naturally contained. The ProcellaCOR product label says its use is for "slow-moving/quiescent waters." The complex currents and water flow patterns in Lake George, as anyone knows who has ever boated or sailed on that lake, are anything but "slow-moving" or "quiescent." The ProcellaCOR product label states:

> ProcellaCOR EC is a selective systemic herbicide for management of freshwater aquatic vegetation in slow-moving/quiescent waters with little or no continuous outflow: ponds, lakes, reservoirs, freshwater marshes, wetlands, bayous, drainage ditches, and non-irrigation canals, including shoreline and riparian areas in or adjacent to these sites. Also for management of invasive freshwater aquatic vegetation in slow-moving/quiescent areas of rivers (coves, oxbows or similar sites).

Given the recommendations of the product manufacturer it does not appear that the project's plans for containment of the chemical in the proposed treatment areas are sufficient. The chemical is likely to spread far and wide to other areas with unintended and unknown consequences and impacts. Other applications of ProcellaCOR in New York have documented the spread of the chemical beyond its intended treatment area.

Minerva Lake Experience: The APA previously permitted the use of ProcellaCOR in Minerva Lake, in southern Essex County, which is much smaller than Lake George. 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.

There is a high likelihood in Lake George that this chemical will spread beyond the treatment area, and this must be examined by the APA.

Chautauqua Lake Experience: ProcellaCOR was also used in Chautauqua Lake, in western New York, and the results were mixed as to the reduction of EWM and the failure to contain the chemical in treatments areas. The chemical moved to other parts of the lake, driven by the lake's currents. Here's the link to the follow-up report that details the mixed results on Chautauqua Lake:
http://www.chautauquaalliance.org/wp-content/uploads/2021/02/2020_FINAL_ChautLkHerb_PH-3rdParty_Rpt.pdf

In sum, based on use of ProcellaCOR in Minerva Lake and Chautauqua Lake, this chemical seems certain to move beyond the target locations to other areas in Lake George. It does not appear to us that the Park Commission's plans are adequate for containing ProcellaCOR or in documenting its spread and impacts outside of the treatment areas.

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

- As stated above, the project is weak in its planning to control the flow of this chemical outside the treatments areas. Given the winds of the area, high number of streams, and complicated bathymetry of Lake George, its currents and flow patterns are subject to sudden change from weather pattens and rainfall. The Park Commission does not appear to have adequately taken this complexity into account, nor has it prepared an adequate plan to document the spread and impacts beyond the treatment area when the treatment area is breached.
- The data supplied on site conditions is inadequate. The project needs to establish a rationale for this project by documenting why the selected sites cannot be treated with hand harvesting.
- If this project is successful, there will be a massive biomass of dead aquatic vegetation, and the project does not appear to have fully scoped the potential impacts for harmful algal blooms (HABs) or other events due to the massive amount of phosphorus loading from the sudden mass of decaying material.
- Our review of the application does not find adequate scientific data regarding potentially adverse impacts to the rich diversity of native aquatic plants and organisms in Lake George.
- The long lasting effects ProcellaCOR as it breaks down over time and its subcompounds remain is not detailed in the application.
- One viable alternative is enhanced use of hand harvesting. The application fails to state why this effort, which over the last 10 years has significantly reduced the number of beds and extent of EWM in Lake George, is not viable.

Experimentation: The Park Commission application does not address the viability of safe experimentation by using mesocosms. These were used in experimentation for chemical treatments for Asian claims in Lake George and the Jefferson Project has used this technique to model various water quality conditions. Use of ProcellaCOR clearly would benefit from experimentation outside the natural waters of Lake George.

Questions merit full examination in an official Adjudicatory Public Hearing: The APA ordered and conducted a formal adjudicatory hearing on the proposed use of the aquatic herbicide Sonar (SeaPro) by the Park Commission two decades ago. ProcellaCOR is less proven than Sonar was at time. The treatment plan contains many of the same weaknesses as the project in 2001-2003 (the APA Board voted the project down in January 2003). The new Park Commission project to use chemicals in Lake

George merits the same high level of public scrutiny, opportunity for independent expert testimony, and public involvement accorded to the review of the Sonar project 20 years ago. Given the public concern about this project and the extensive scientific expertise available in the Lake George research community, there is a certainty that this project would change and that new information would be revealed that would help the APA in its decision. 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.

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,

Peter Bauer,
Executive Director

Michael & Sharon Serini
177 Chapel Hill Rd
Highland, NY 12528

March 31, 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,

Sharon Serini

Michael & Sharon Serini
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Queensbury, NY 12804