



Date: December 17, 2023.
Brant Lake, NY.

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor.

Having been involved myself, since 2005, in combating milfoil, I know how difficult it is to win this battle. I have spent numerous hours on the water helping with benthic matting, in the water picking up fragments, or under water as a diver doing volunteer hand harvesting.

We have exhausted our volunteers, are at our limits for fundraising to hire companies like Aqualogic, and we are losing the battle. It is time for science.

I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for 6 generations (over 100 years). I fully believe that this treatment will make the difference. Let's do it.

Sincerely

Luc Aalmans and Abigail Erdmann
26 Brant Lake Farm Road, Brant Lake, NY 12815

Luc Aalmans



Richard Gordon <rgordon@ramapoeyecare.com>

Thu, Dec 7, 12:57 PM
(21 hours ago)

to me

Dear Mr. Ziemann:

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Richard N. Gordon, M.D.

Preston Graham <prestongrahamjr@gmail.com>

Thu, Dec 7, 1:04 PM
(21 hours ago)

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 15 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference

Sincerely

Preston Graham

655 PALISADES RD, Brant Lake NY

Larry Sanders <lorenzo5755@gmail.com>

Thu, Dec 7, 1:06 PM
(21 hours ago)

to me

Dear Mr. Zeimann,

I am writing to express my strong support for applying Procella Cor treatment to combat the millfoil invasion of Brant Lake. We have had a home on Brant Lake for over 25 years and the infestation in the lake, especially in the cove where we have our house has gotten severe and threatens to choke the area of its natural habitat. I have attended public meetings on using the treatment and am comfortable to support its application without reservations. The hand harvesting done up to now is clearly unsatisfactory and we need to address this problem now. I hope my support will help in achieving an approval for application.

Sincerely,

Lawrence Sanders
1294 Palisades Road
Brant Lake, NY 12815

Sent from my iPhone

Elna Meader <elnameader@gmail.com>

Thu, Dec 7, 1:38 PM
(20 hours ago)

to me

I fully approve the application of ProcellaCor Treatment on Brant Lake
Sincerely, Elna Meader, Linda Bean, Buck Meader...

Thu, Dec 7, 1:51 PM
(20 hours ago)

Regina Knecht <knecht537@gmail.com>

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: 12/7/23

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 7 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Regina M Knecht

73 Brant Lake Heights

P.O. Box 32

Brant Lake, NY 12815

Thu, Dec 7, 2:30 PM
(19 hours ago)

Carolyn Fagan <dfagan1933@gmail.com>

to me

Attached please find a letter stating our support of the Permit Application for ProcellaCor Treatment on Brant Lake NY.

Thanks for all BLA does for all of us on Brant Lake.

Sincerely,

Carolyn and Dennis Fagan
December 7, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann,

We are writing to state our support of the application for treating five areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil on Brant Lake has been increasing at an alarming rate. Our Brant Lake Association has been active with volunteers and hiring professional divers to hand harvest this invasive species for many years and we are losing the battle. We have been following the information on ProcellaCor treatment and in all reports that we have read; it appears to be a safe and effective means of combating this invasive species. Our family owns a home on Brant Lake and we have enjoyed the beautiful area for many years, and want our grandchildren and their children to be able to enjoy it as well. We have supported the harvesting program by volunteering and funding those efforts and believe that ProcellaCor treatment will redouble the improvements to our lake.

Sincerely,

Carolyn and Dennis Fagan

511 Palisades Road

Brant Lake, NY 12815

rmiron2@nycap.rr.com

Thu, Dec 7, 2:30 PM
(20 hours ago)

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: 12/7/23

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports, it appears very safe and very effective. Our family has a home in Brant Lake, and we have enjoyed this beautiful area for over 20 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference. I am the Treasurer of the Brant Lake Estates Association which has 28 parcels in our development with 18 parcels directly on the lake including a beach and dock area. Our development is on the south end of the lake and according to the maps I have seen, our development is in a high Eurasian Milfoil infested area. We have been fighting this battle for 20 years and we have slowed the growth but have not reversed the effects of the milfoil and in fact are losing the battle. I firmly believe that the ProcellaCor treatment may not eliminate the milfoil, but will go a long way towards significantly reducing the milfoil in Brant Lake.

Best regards,

Richard & Susan Miron

49 Brant Lake Estates Road

Brant Lake, NY 12815

518-573-3346 Cell

Thu, Dec 7, 3:03 PM
(19 hours ago)

Chris McDermott <mcdermottcm@gmail.com>

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: 12/7/2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to express my full support for the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake and postponing treatment is not in our best interest. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 20 years. We have supported the harvesting program through volunteering and funding efforts and believe this ProcellaCor treatment will make a big difference.

Sincerely

Chris McDermott

21 Horicon Birches Rd Ext

Brant Lake NY 12815

Thu, Dec 7, 1:39 PM
(20 hours ago)

Stacey Gilmartin <staceygilmartin13@gmail.com>

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: December 7, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann:

We are writing to state we fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional divers who have been hand harvesting, and combating this invasive for many years. We are not winning the battle. We have been following the information on ProcellaCor treatment and in all the reports it appears very safe and very effective.

In the 1940s and 50's my grandmother was the Post Mistress of Brant Lake and with her husband, owned Cronin's Market on the millpond. They lived their entire lives in Brant Lake and my family visited often so it was only natural for us (my wife and I, along with my sister) to buy our year-round vacation home on beautiful Brant Lake in 2007.

We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference. We need help to keep our lake healthy.

Sincerely

John and Stacey Gilmartin

519 Palisades Road

Brant Lake, NY

88 Rock Road

Glen Rock, NJ

Bill McCarthy <Bill@mccarthyinsurance.net>

Thu, Dec 7, 1:59 PM
(20 hours ago)

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: 12 07 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area **for over 50 years**. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

The health and future of our beloved lake and surrounding community hinges on this project, we fully approve of it.

Sincerely

Bill McCarthy

237 Palisades Road Brant Lake NY 12815

Carl Heilman II <photos@carlheilman.com>

Thu, Dec 7, 1:53 PM
(20 hours ago)

to me, wbutler141, Tom, k9fitzpatrick

Subject: Permit Application For ProcellaCOR Treatment on Brant Lake NY

Date: 12/7/23

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann,

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCOR. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCOR treatment and in all reports it appears very safe and very effective. Our family has a home on Brant Lake and we have enjoyed this beautiful area for 70 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Our year round home has a wetland border in one of the affected areas. Until this past summer I had never seen any Eurasian milfoil beyond the areas being harvested, but when swimming this summer in the latter part of the season I found at least a half dozen patches of milfoil reaching close to the surface all across our swimming area around all the swim rafts in the bay. It has spread considerably and I believe this is the only efficient way to control it.

I avoid chemicals and pesticides as much as possible. We maintain our acre of front yard bordering the lake as a meadow, rather than a lawn and don't use any fertilizers, etc. on our grounds. But I feel, from all I've read and researched, that ProcellaCOR is the most benign way to control the milfoil and is most definitely the lesser of the two evils when comparing a milfoil infestation to an application every few years to keep it under control.

Waiting another year will allow it to spread and take foothold in a much greater area in the affected areas of the lake, becoming much more easily spread around by boat traffic, fisherman, and any other means of fragmentation.

Sincerely,

Carl Heilman II
photos@carlheilman.com / ceh2photos@gmail.com
6990 State Route 8
Brant Lake, NY 12815
Phone / Fax 518-494-3072

Linda & Frank Cappabianca <lfcappa@gmail.com>

Thu, Dec 7, 5:23 PM
(17 hours ago)

to me

To Whom it May Concern:

My son owns a business on the Mill Pond ("THE HUB") at the outlet of Brant Lake, and the health of his business is directly related to that of the lake. I would like to go on the record saying

I am very much in favor of this treatment happening, especially after having read much about its history, safety and efficacy.

Please approve this application.

Frank Cappabianca
Glens Falls & Brant Lake

rduplain@optonline.net

Thu, Dec 7, 6:11 PM
(16 hours ago)

to me

Date: 12.7.23

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Hello Mr. Ziemann,

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports, it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 10 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

I have spoken with several folks on different lakes and people close to understanding so called side affects and we are very comfortable with supporting this treatment.

Regards
Ray Duplain
Brant Lake, NY

Phoebe Olhava <polhava@gmail.com>

Thu, Dec 7, 6:26 PM
(16 hours ago)

to me

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 100 years. My grandparents, who have both now passed away, met in the summer at the Lake. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,

Phoebe Olhava

7727 St. Route 8

Brant Lake, NY 12815

Greg Jackson <g.jackson@bennettcontracting.com>

to me

GREG JACKSON | *Retired Founder*

D: | O: 518-462-6731

www.bennettcontracting.com | 693 S. Pearl Street, Albany 12202

Greg Jackson

36 Lyons Ave.

Delmar, New York 12054

518 439-7828

12/7/2023

NY State Adirondack Park Agency

Mr. Aaron Ziemann

1133 NY-86

Ray Brook, NY 12977

Subject: Permit Application for ProcellaCor Treatment on Brant Lake NY

Dear Mr. Zieman

We are writing to express our support for the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at an alarming rate on our lake. We have owned our lake front property for 40 years and wish to keep the lake healthy and prosperous. We have been following the information on ProcellaCor treatment and in all reports, it appears very safe and very effective.

Sincerely,

Greg and Laurie Jackson

50 Cozy Cove rd. Brant Lake, NY

Thu, Dec 7, 7:10 PM
(15 hours ago)

Dave Bourque

to me

Tom,

As requested, attached is my and Laura's ProcellaCOR endorsement letter for the APA. Thanks for doing this. I hope you get many responses.

Dave

December 7, 2023

Aaron Ziemann, Adirondack Park Agency

P.O. Box 99

Ray Brook, NY 12977

Re: Brant Lake Association ProcellaCOR Permit Application

Dear Mr. Ziemann

The Brant Lake Association is applying to the APA for a permit for the use of ProcellaCOR in Brant Lake, NY. I am writing to express my full support for the use of ProcellaCOR in Brant Lake. The Eurasian Water Milfoil continues to spread at alarming rates regardless of on-going efforts. Volunteer and professional diver hand harvesting is expensive and is not sustainable. The efforts are getting more costly and we are losing the battle.

My family has owned a summer camp on Brant Lake for 55 years. I have seen the change. Brant Lake is now at risk to an invasive species. My educational background is in Environmental Science and Biology. I am well informed about ProcellaCOR and have been reading about the documented success stories of ProcellaCOR on near-by lakes. The ProcellaCOR treatments are a needed tool against the EWM. I strongly encourage the APA to approve the Brant Lake Association permit application for the use of ProcellaCOR.

Respectfully,

Dave & Laura Bourque

6 Sanford Place

Altamont, NY 12009

John Hall

Thu, Dec 7, 7:42 PM
(15 hours ago)

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

12/7/2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

WE support the application for treating Brant Lake with ProcellaCor.

The Brant Lake Association has been fighting a losing battle with milfoil for many years. ProcellaCor has been safe and effective in other similar locations

Our family has a home in Brant Lake and we have lived in this beautiful area for 6 generations. We need to protect the lake for future generations.

Sincerely

John and Ann Hall

736 Palisades Rd

Brant Lake

Thu, Dec 7, 7:52 PM
(15 hours ago)

Audrey Knoblauch <audreyk1975@msn.com>

to me

December 7, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional divers hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference. Please help us to protect our beautiful lake for future generations to use and enjoy for many more years to come!

Sincerely,

Audrey J. Knoblauch

Address from Audrey's iPhone

Thu, Dec 7, 8:30 PM
(14 hours ago)

Heather Zeuner <heather.zeuner@gmail.com>

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: December 7, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann,

We are writing to state that we fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. We have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake, and we hope to continue to enjoy the area for many years to come. We strongly believe this treatment will make a big difference in preserving our beautiful lake.

Sincerely,

Matt and Heather Zeuner

17 Brant Lake Heights Dr. Ext

Brant Lake, NY

Robert Urquhart <robert.urquhart7@gmail.com>

Thu, Dec 7, 9:59 PM
(13 hours ago)

to me

Dear Mr. Wynne,

I am a 24 year resident of Brant Lake and write in full support of ProcellaCor use to treat our persistent Eurasian Milifoil problem. Despite our best efforts hand harvesting has not worked. I had started to think we were fighting a losing battle. I am hopeful that the initial good results using this herbicide will prove resilient. We bought our house on Brant Lake because we thought it was the most beautiful Lake in the Adirondacks. We'd like to keep it that way.

Robert Urquhart
1102 Palisdaes Road
Brant Lake, NY

6:42 AM (4
hours ago)

Thomas Jones <thomasajones75@icloud.com>

to me

December 8, 2023

Dear Mr. Ziemann,

I am sending this email to express my support for the application of ProcellaCor to combat milfoil on Brant Lake. Our lake association has been attempting to harvest milfoil by hand, yet the problem seems to get worse with each passing year. ProcellaCor has been an item of interest for many people in the area and I have been reading up on it over the last few years. My family and I own a home on the lake and given the apparent safe and effective nature of this herbicide, we hope you will consider approval for its use on our lake.

Best,

Tom

Thomas Jones
7765 State Route 8
Brant Lake, NY

amartin1@nycap.rr.com

7:22 AM (3
hours ago)

to me

December 8, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

My family has had a summer house on Brant Lake for over seventy-five years and I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,

Albert Martin

41 Woodruff Dr.

Glenville, NY 12302

Summer address,

7283 Rt 8

Brant Lake, NY 12815

Jane Lewit

8:49 AM (2
hours ago)

to me

Support the Permit Application For ProcellaCor Treatment on Brant Lake

December 8, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our beautiful lake. Our Brant Lake Association has been active with volunteers and professional divers hand harvesting for many years to combat this invasive. Needless to say, we are losing this battle.

Detailed and extensive studies show that ProcellaCor treatment is very safe and very effective. It has been used with excellent outcome in Adirondack lakes and many others throughout the country.

Our family has been in Brant Lake since 1917 and home owners since 1945. We are confident this ProcellaCor treatment will make a big difference. It has the wide spread support of our community

Jane Lewit
7721 State Route 8
Brant Lake NY 12815

John Pierce <john.pierce1961@yahoo.com>

9:07 AM (2
hours ago)

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. For many years our Lake Association has been active with volunteers and professional divers hand harvesting the Milfoil attempting to combat the spread of this invasive plant and we are not winning the battle. I have been following the information on ProcellaCor treatment as it is presently being utilized as a treatment in many Adirondack Lakes and by all accounts it appears very safe and very effective. Our family has a home on Brant Lake and we have enjoyed this beautiful area for over 60 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference. Thank you for your attention to this matter.

Sincerely

Kim/John Pierce

10:29 AM (47 minutes ago)

Anne Fitzpatrick <jafitz@optoni
to me

Mr. Aaron Ziemann
NY State Adirondack Park Agency
December 8 ,2023

Dear Mr. Ziemann,

We believe it is important that you know we fully support the application for treating Brant Lake with ProcellaCor. We have seen over the years how rapidly the Eurasian Water Milfoil has been increasing in the Lake. Last summer was particularly bad. Our Lake Association has been very active with volunteers and professional divers hand-harvesting to combat this invasive plant, and it has been a losing battle. Based on the information we have heard from experts and in all the reports we have seen, the ProcellaCor treatment appears to be very safe and very effective. Our family has had homes on Brant Lake for over 50 years and we have contributed significant funds to support milfoil eradication. We think the ProcellaCor treatment will make a big difference in the success of this effort.

Thank you for your consideration.

Sincerely,

Joe and Anne Fitzpatrick
36 Horicon Birches, Brant Lake, NY

From: David <drsmith1155@gmail.com>
Date: December 7, 2023 at 4:05:49 PM EST
To: wynnetom50@gmail.com
Subject: support for Brant Lake effort to eradicate Milfoil

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I am a physician and former Commissioner of Health of Texas and a Professor at SUNY Upstate Medical University and a member of the Brant Lake Association.

I have been closely following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 3 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

David Smith, MD
15 Hill Side D
Brant Lake, NY

Sent from my iPhone

11:05 AM (27
minutes ago)

Janet Early <janet.early.je@gmail.com>

to me, Jim

Attached is the letter that Jim (Ventura) and I will mail today to the APA on the BLA's application for the ProcellaCor treatment on Brant Lake.

7824 State Route 8

Brant Lake, N.Y.

December 8, 2023

Mr. Aaron Ziemann

NYS Adirondack Park Agency

P.O. Box 99

1133 NYS Rt. 86

Ray Brook, N.Y. 12977

Dear Mr. Ziemann,

We are writing to state that I fully support the application of ProcellaCor for the treatment of 5 heavily infested areas (with Eurasian Water Milfoil) of Brant Lake. The Brant Lake Association and the Town of Horicon have been monitoring and actively battling this invasive species for many years and is absolutely losing the battle. More than a million dollars has been spent over many years to pay for professional divers to remove the offensive plants. Plus, hundreds of hours of volunteer divers and support staff have been invested to supplement the efforts of the professional crews. And, we fear, that without a breakthrough, our lake is doomed. Having the lake classified as "impaired" by the DEC was a wake-up call that more advanced methods were needed to deal with this problem in our small and shallow lake.

ProcellaCor has proven to be both a safe and effective treatment for Eurasian Water Milfoil. We have followed the successful treatment in other area lakes and have read the scientific reports on the safety of this treatment to humans, animals and other plant life. We have no concerns about the application in Brant Lake, and support its applications at the soonest possible date in the spring of 2024.

We have owned a home on Brant Lake since 1986, being drawn to Brant Lake because of the health and

beauty of this lake. In 2021, we moved to Brant Lake as a permanent resident and care deeply for the town, and the lake. We would like to see Brant Lake restored to its former health as quickly as possible, and believe the application of ProcellaCor is a major step in that direction.

We encourage the Adirondack Park Agency to approve the Brant Lake Association's application for ProcellaCor treatment of Brant Lake.

Sincerely,

Janet Early and Jim Ventura

cc: Brant Lake Association

Ben Lewit <benjaminlewit@gmail.com>

12:30 PM (5
hours ago)

to me

Mr. Aaron Ziemann
NY State Adirondack Park
Agency
Dear Mr. Ziemann

I would like to express my support for the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are losing the battle. ProcellaCor treatment is very safe and very effective. The alternative, death of the lake by invasive species, is worse. Our family has a home in Brant Lake my great grandparents swam here. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely
Ben

Ben Lewit
7721 State Rt. 8
Brant Lake NY12185

923 Cascade Ave
Hood River, OR 97031

--

Ben Lewit
(541) 400-6190

12:32 PM (5
hours ago)

Jessica Mabunay <jmabunay31@gmail.com>

to me

Dear Mr. Ziemann,

My husband and I are writing in support of the Brant Lake Association's application for treating 5 acres of Brant Lake with ProcellaCOR.

My father's family have been residents of the Brant Lake community for over 80 years and my family has owned our home on the lake for 47 years. We are concerned with the invasion of the Eurasian Water Milfoil that has been growing at an alarming rate throughout the lake.

Our Lake Association has been very active working to combat the milfoil, but hand harvesting and professional divers have not been able to keep up with invasive species. Just within the last two years we have seen it rapidly spreading in our cove.

We have read up on the ProcellaCOR treatment. It is not hazardous under the criteria of the Federal OSHA hazard communication standard and from our understanding it will be very effective in killing the weed that is invading our beautiful lake.

We fully support the use of ProcellaCOR in Brant Lake and would like to see treatment begin as soon as possible. Thank you for your consideration.

Sincerely,
Jessica and Nicholas Mabunay

2:06 PM (4
hours ago)

Tiffany Flowers <flowers222@gmail.com>

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann,

In order to ensure the quality and longevity of Brant Lake, I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. My parents actively participated in these activities and we have all spent many vacation hours doing our part to remove milfoil from the lake. I researched the information on ProcellaCor treatment and recognize it has proven to be safe and effective for other waterways. Our family has a home in Brant Lake and we have enjoyed this beautiful area for multiple generations. We have supported and will continue to support the harvesting program through volunteering and funding efforts, but time is of the essence and I believe this treatment will make a big difference.

Sincerely

Tiffany Flowers

Houston, TX 77044 (Brant Lake Address: 90 Horicon Birches)

6:26 PM (14
minutes ago)

Bill <bluffsbill@me.com>
to me

Subject: Endorsement for ProcellaCor Treatment Permit Application on Brant Lake, NY

Attached: MS Word Copy of this letter

Date: December 8, 2023

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Dear Mr. Ziemann,

I am writing to express my strong endorsement of the application seeking a permit to treat five areas of Brant Lake with ProcellaCor. The increasing presence of Eurasian Water Milfoil in our lake has become a matter of great concern, despite the dedicated efforts of our Lake Association's volunteers and professional divers engaged in hand harvesting.

Our Lake Association has been at the forefront for many years, tirelessly combating the invasive Eurasian Water Milfoil through volunteer work and financial contributions, including mine and other family members. However, the invasive species continues to pose a significant threat to the ecological balance of Brant Lake, necessitating a more robust and effective solution.

Having reviewed the information on ProcellaCor treatment, I am convinced of its demonstrated safety and efficacy. The reports and studies indicate that ProcellaCor has the potential to address the challenges posed by Eurasian Water Milfoil more comprehensively compared to the current hand harvesting approach.

My wife's family has called Brant Lake home for over 80 years, and after living at Brant Lake for five months per year over the last 8 years, she and I have made it our permanent residence. During this time, we have witnessed the lake's natural beauty and have actively participated in various conservation efforts. Understanding the urgency and severity of the Eurasian Water Milfoil issue, we firmly believe that ProcellaCor treatment is a promising step toward preserving the long-term health of Brant Lake.

I have confidence that the Adirondack Park Agency will carefully consider the implications of this application and its potential positive impact on our community. Thank you for your dedication to the preservation of our natural resources and the sustainability of Brant Lake.

Sincerely,

William Ryan
1118 Palisades Road
Brent Lake, NY 12815

6:33 PM (14
minutes ago)

eels.cord.0e@icloud.com

to me

Subject: Endorsement for ProcellaCor Treatment Permit Application on Brant Lake, NY

Date: December 8, 2023

ATTACHED: MS Word Copy of this email

Mr. Aaron Ziemann
Adirondack Park Agency
State of New York

Dear Mr. Ziemann:

I am writing to express my wholehearted support for the permit application seeking approval to treat five specific areas of Brant Lake with ProcellaCor. The increasing prevalence of Eurasian Water Milfoil in our cherished lake is a matter of profound concern, despite the diligent efforts of our dedicated Lake Association volunteers and skilled divers involved in manual harvesting.

Over the past several years, our Lake Association has been at the forefront, tirelessly combating the invasive Eurasian Water Milfoil through a combination of volunteer work and financial contributions from community members, including myself and other family members. Despite these collective endeavors, the invasive species continues to pose a significant threat to the ecological balance of Brant Lake, necessitating a more robust and efficient solution.

Upon a thorough examination of the information on ProcellaCor treatment, I am convinced of its proven safety and effectiveness. The comprehensive reports and studies suggest that ProcellaCor has the potential to address the challenges posed by Eurasian Water Milfoil more efficiently than the current manual harvesting approach.

Brant Lake holds special significance for my wife and me, as her family has considered it home for over 80 years. After residing at Brant Lake for five months per year over the past eight years, we have now made it our permanent residence. During this time, we have had the privilege of experiencing the lake's natural beauty and actively participating in various conservation efforts. Recognizing the urgency and severity of the Eurasian

Water Milfoil issue, we firmly believe that ProcellaCor treatment represents a promising step toward preserving the long-term health of Brant Lake.

I have the utmost confidence that the Adirondack Park Agency will thoroughly consider the implications of this application and recognize its potential positive impact on our community. Thank you for your steadfast dedication to the preservation of our natural resources and the sustainability of Brant Lake.

Sincerely,
Michele Ryan
1118 Palisades Road
Brant Lake, NY 12815

2:30 PM (4
hours ago)

Robert Knoblauch <rdk959@msn.com>

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Robert Knoblauch

7054 State Route 8

Brant Lake, NY 12815

518-949-5534

2:42 PM (4
hours ago)

Len Panzer <lpanzer@yahoo.com>

to me

12/08/2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

We are writing to state that we fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake, including all around our house and boating / swimming areas. Our Lake Association has been active with volunteers and professional divers hand harvesting this invasive species for many years and we are losing the battle. We have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our extended family has enjoyed this beautiful area for over 80 years, and we have personally been on Brant Lake for over 10 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference. Thank you.

Best,

Len and Nancy Panzer

7047 State Route 8

Brant Lake, NY 12815

Don Henshaw <don.henshaw@sbcglobal.net>

2:43 PM (4
hours ago)

to me

Re: Permit Application For ProcellaCor Treatment on Brant Lake NY

12/8/23

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

My grand parents and parents before me have been going to Brant Lake since 1920. In 1977 my parents bought at Raymond's cove and we have been enjoying the lake all these years. I say this to emphasize that we have an experienced long-term perspective on the health of Brant Lake, and have definitely seen the negative effects of development over the years on the lake.

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on the lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Please grant the permit - it's important to the health of the lake and surrounding community and to wildlife that call the Adirondack Park home.

Sincerely,
Don Henshaw

jerry@abbingtoncapital.com via yahoo.com

6:55 PM (3
minutes ago)

to Isobel, Brant, me

Attached is a support letter from me and Isobel.
Thanks for all you are doing for our lake!
Jerry

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: December 7, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann,

I have a home on the shore of Brant Lake that we built in 2008. I am writing to state that I fully support the application for treating the milfoil in Brant Lake with ProcellaCor. I have attended various meetings and reviewed information on ProcellaCor treatment, and it appears very safe and very effective.

The eurasian milfoil has been increasing at alarming rates on our lake. As a certified diver, I have personally volunteered since 2010 laying and removing mats and hand harvesting the milfoil. Every summer I hand harvest milfoil in front of my home and my neighbor's home. My family has also made significant donations to help fund the professional milfoil harvesting services used of the years. I am an avid user of the lake for various water sports, fishing and recreation. I have seen firsthand how the milfoil expands every year. Every time I go out on the lake I find fragments of milfoil floating around and spreading. The current methods being used to control it are just not sustainable.

My family and I urge you to approve the ProcellaCor treatment to help save our beautiful lake!

Sincerely,

Jerry & Isobel Szilagyi

73 Brant Lake Estate Road

Brant Lake, NY

631-513-2188

dpdoyle@twc.com

11:51 AM (7
hours ago)

to me, Wayne

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Dennis Doyle

12:03 PM (7
hours ago)

Marc Lustick <marclustick@gmail.com>

to Tom, me

Tom:

Please forward my comments to Mr. Aaron Ziemann at the APA

Dear Mr. Ziemann:

I have been involved with the Brant Lake Association's efforts to control Eurasian Milfoil since we first began more than three decades ago. In fact it was a detailed letter from a friend of mine, then Acting Dean of Albany Medical College and an avid scuba diver, who first identified Eurasian Milfoil in Brant Lake whose input was apparently instrumental in the APA' decision to grant us our first permit for matting. Since then, I have remained active in our significant efforts to other volunteers and professionals and have carefully reviewed our results and the information on Procella Cor's safety and effectiveness.

I wholeheartedly and with no reservations support our application to treat five areas of Brant Lake with ProcellaCor. I have cherished every moment of the 43 years I have owned and resided six months a year at my two adjacent lakefront homes and truly hope that ProcellaCor will enhance the health of our beautiful lake.

Thank you for considering my input.

Health and happiness,
Marc W. Lustick, Esq.
(518) 439-9458

Cheryl and Dave McNierney <cherylanddavemcnierney@yahoo.com> 12:12 PM (6 hours ago)

to me

Tom,
My signed letter is attached.

Dave McNierney

The screenshot shows an email client window with a PDF attachment titled "7 Dec 2023 letter to APA 2.pdf". The PDF content is displayed in a viewer window. The letter is dated "7 December 2023" and is addressed to Mr. Aaron Ziemann at the NY State Adirondack Park Agency. The subject is "Permit Application For ProcellaCor Treatment on Brant Lake New York". The letter text reads: "Dear Mr. Ziemann, I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports, it appears very safe and very effective. Our family has a home in Brant Lake at 90 Horicon Birches, Brant Lake, New York 12815, and we have enjoyed this beautiful area for 71 years. As a certified SCUBA diver, I have actively supported the harvesting program through volunteering and funding efforts for many years. While these efforts have been valuable, they are not able to keep up with the recurrent milfoil growth. That is why I believe this treatment, which has proven to be safe and effective in other freshwater lakes, will make a big difference for Brant Lake." The letter is signed "Sincerely, David F. McNierney" with a handwritten signature. The address is "4300 Ashworth Court, Williamsburg, Virginia 23188". On the right side of the screenshot, the Adobe Acrobat Reader interface is visible, showing the "Adobe Export PDF" panel with options to convert the PDF to Word or Excel Online. The selected file is "7 Dec 2023... APA 2.pdf" and the target format is "Microsoft Word (*.docx)". A "Convert" button is present.

Robert Lewit <rtlewit@gmail.com>

Fri, Dec 8, 9:56 PM
(10 hours ago)

to me

Support the Permit Application For ProcellaCor Treatment on Brant Li

December 8, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our beautiful lake. Our Brant Lake Association has been active with volunteers and professional divers hand harvesting for many years to combat this invasive. Needless to say, we are losing this battle.

Detailed and extensive studies show that ProcellaCor treatment is very safe and very effective. It has been used with excellent outcome in Adirondack lakes and many others throughout the country.

Our family has been in Brant Lake since 1917 and home owners since 1945. We are confident this ProcellaCor treatment will make a big difference. It has the wide spread support of our community

Robert Lewit
7721 State Route 8
Brant Lake NY 12815

--

Robert Lewit 240-543-9250
rtlewit@gmail.com

7:29 AM (1
hour ago)

Brad Williams <bwinct@aol.com>

to me

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Brad Williams

7060 State route 8, Brant Lake, NY

August 18, 2022

Mr. Aaron Ziemann

NY State Adirondack Park Agency

P.O. Box 99

Ray Brook, New York 12977

Dear Mr. Ziemann,

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. Eurasian Water Milfoil (EWM) has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following available information on ProcellaCor treatment and in all reports it appears safe and very effective.

I and my family have a home in Brant Lake and we have enjoyed this beautiful area for over 40 years. We sadly have watched EWM slowly take over the 5 areas where it is planned to apply ProcellaCor. We have supported the harvesting program through volunteering and funding efforts and truly believe the planned treatment of ProcellaCor will make a significant difference.

Sincerely,

Gerald Byrne

500 Palisades Road

Brant Lake, New York 12815

Ph: 917-359-2389 / 518-494-8040

jatoph@verizon.net <jatoph@verizon.net>

Dec 10, 2023, 5:03 PM (16 hours ago)

to me

We are long time residents of Brant Lake, and support any and all methods of keeping our beautiful lake clean.
Joseph and Joan Henshaw

Ann Ferentz <aferentz@yahoo.com>

9:27 AM (9 minutes ago)

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: December 11, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann,

I am writing to support the treatment of Brant Lake with ProcellaCor.

Brant Lake has been infested with Eurasian Water Milfoil for decades, and the Brant Lake Association has worked hard to stay on top of the problem. However, in recent years even a full season of hand harvesting by a team of professional divers and volunteer efforts have been insufficient to keep the milfoil under control. Most alarmingly, the water quality has begun to decrease significantly and oxygen levels in the lake are dropping. Another approach is needed to save Brant Lake. ProcellaCor treatment appears safe and effective and I fully support its use. It is the logical next step and is needed as soon as possible to restore the water quality in Brant Lake before it is too late.

Sincerely,

Ann Ferentz
P.O. Box 73
Brant Lake, NY 12815

Michael Ladd <laddmichaelj@gmail.com>

9:35 AM (4 minutes ago)

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Zieman

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Michael Ladd

113

Patricia and David Boynton

571 Palisades Road

Brant Lake, NY 12815

908-310-2454

December 8, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Re: Permit Application for ProcellaCOR Treatment on Brant Lake NY

Dear Mr. Ziemann,

My husband and I are writing in support of the Brant Lake Association's application for treating 5 acres of Brant Lake with ProcellaCOR.

My husband's family have been residents of the community for over 80 years and we have owned our home on the lake for 47 years. We are concerned with the invasion of the Eurasian Water Milfoil that has been growing at alarming rates throughout the lake.

Our Lake Association has been very active working to combat the milfoil, but hand harvesting and professional divers have not been able to keep up with invasive species. Just within the last two years we have seen it rapidly spreading in our cove.

We have read up on the ProcellaCOR treatment. It is not hazardous under the criteria of the Federal OSHA hazard communication standard and from our understanding it will be very effective in killing the weed that is invading our beautiful lake.

We fully support the use of ProcellaCOR in Brant Lake and would like to see treatment begin as soon as possible.

Thank you for your consideration.

Sincerely,

Patti & David Boynton

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: December 9,2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

We are writing to state our full support for the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle.

We have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 44 years. We have been actively involved in our volunteer team's hand harvesting this "beast" and preparing, laying, and then removing mats to combat its spread for over 20 years.

We whole heartedly support the harvesting program through the current funding efforts and believe this

treatment will make a big difference in controlling, and maybe eventually removing this invasive from our

lake.

Sincerely

Terrence & Bette Lynch

12 Sand Beach Way

Erin Cram <erincram@gmail.com>

Mon, Dec 11, 9:45 AM
(22 hours ago)

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcettaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcettaCor treatment and in all reports it appears very safe and very effective. I regularly visit the Brant Lake family home of friends, and have greatly enjoyed the lake and surrounding areas over the past few years. I am writing this letter to support my friends and the general tourism/economic viability of this area. I believe this treatment will make a big difference.

Sincerely

Erin Cram
334C Beacon St
Somerville, MA
02143

Sun, Dec 10, 7:31 PM
(2 days ago)

Dave Shuster <dshuster51@gmail.com>

to me

Dear Mr. Ziemann,

I fully support the application for treating five areas of Brant Lake with ProcellaCor to combat the alarming increase of Eurasian Water Milfoil at the lake. Our Lake Association has been active with volunteers and professional divers hand-harvesting and fighting this invasive species for several years, but we apparently are not winning the battle. I have been following the information on ProcellaCor treatment, and in all reports it appears very safe and effective. Our family has a home on Brant Lake, and we have enjoyed this beautiful area for nearly 20 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,

Dave Shuster
38 Brant Lake Estates Loop
Brant Lake, NY 12815
(917) 685-6740

Mon, Dec 11, 1:45 PM
(18 hours ago)

Anna McLoon <annamcloon@gmail.com>

to me

December 11, 2023

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Dear Mr. Ziemann,

I would like to voice my support for the application for ProcettaCor treatment on Brant Lake. For the past 6 years, since moving to New York, I have brought my family including 2 kids to Brant Lake several times each summer, and we eat in local restaurants and stay in our friends' house while exploring the Adirondacks. We swim, kayak, canoe, paddleboard, wade and enjoy the good water quality and wonderful opportunities for recreation and relaxation.

I grew up in Minnesota, and have canoed in lakes with established, extensive milfoil, and it is gross. The lake became completely unnavigable at times during the summer, and then rotting weeds are stinky. It would be tragic to see that play out on the beautiful Brant Lake.

A targeted application of the herbicide will help my kids grow up enjoying and appreciating the natural world and will help maintain a lake with a balanced, native ecosystem.

Thank you,
Anna McLoon
108 Cardinal Ave
Albany NY 12209

Christine Baldwin <admin@csbitsolutions.com>

Mon, Dec 11, 4:54 PM
(15 hours ago)

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am sending this correspondence in support of the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective as evidenced by other use-cases. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Christopher and Christine Baldwin

91 Brant Lake Heights Drive

Brant Lake, NY 12815

Chris Porter <cdptrans@gmail.com>

Mon, Dec 11, 8:24 PM
(11 hours ago)

to me

Please see the attached letter of support.

Sincerely,

--

Chris Porter

cdptrans@gmail.com

Re: Permit Application for ProcellaCor Treatment on Brant Lake NY

December 11, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann:

I am writing to support the application for treating five areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing rapidly. The Brant Lake Association has been active with volunteers and professional divers hand harvesting combating this invasive for many years but it is still a significant problem. My understanding is the ProcellaCor treatment is safe and very effective.

My friends have a home on Brant Lake and I've been privileged to enjoy visiting this beautiful area multiple times. I encourage you to apply this treatment and help control the milfoil problem.

Sincerely,

Chris Porter

15 Wheaton Rd.

Arlington, MA 02474

Mon, Dec 11, 8:31 PM
(11 hours ago)

Barbara <kneywilson@gmail.com>

to me

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,

Barbara Kney-Wilson
13 Brant Lake Estates Loop Rd, Brant Lake, NY 12815

Robert Wilson <rbtnwilson57@gmail.com>

Mon, Dec 11, 8:44 PM
(11 hours ago)

to me

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,

Robert A. Wilson
13 Brant Lake Estates Loop Rd, Brant Lake, NY 12815

Clare Ellis <ellis.clare@gmail.com>

Mon, Dec 11, 5:50 PM
(14 hours ago)

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. I have enjoyed Brant Lake so much and I would hate to lose the opportunity to enjoy it more.

All my best,

Alison Clare Ellis

444 East 12th Street

Apt 3A

New York, NY 10009

Anna Wilson <annawils1213@gmail.com>

Tue, Dec 12, 11:11 AM (3 days ago)

to me

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,

Anna Wilson

sullyrif@gmail.com

Tue, Dec 12, 12:50 PM (3 days ago)

to me, sullyrif

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: 12/12/2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for 18 years. We have supported the harvesting program through funding efforts and believe this treatment will make a big difference.

Sincerely

Jack and Denise Rifenburg
32 BLE Loop Road
Brant Lake NY 12815

Gmail

M +1 518 496 3438

GE VERNOVA

One attachment

Matt Lynch

Reply

December 12, 2023

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Subject: Support of Permit Application for ProcellaCor Treatment on Brant Lake, NY

Matthew Lynch
12 Sand Beach Way
Brant Lake, NY 12815
M +1 518-496-3438
matt.lynych@ge.com

Dear Mr. Ziemann,

I hope this letter finds you well this Holiday season. I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake over the past few decades. Our Lake Association has been very active with volunteers and professional diver hand harvesting combating this invasive for many years, but in the end we are not winning the battle. With each successive season it feels like we are getting further and further behind. My family and I have been very much involved in following the information on the ProcellaCor treatment and in all reports we have seen it appears very safe and very effective. Our family has had a home in Brant Lake for over 40 years and we look forward to many more years to come. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Best Regards,



Matthew Lynch

Contacts

this thread

Contacts

Lynch, Matt (GE Vernova)
matt.lynych@ge.com

Tom Wynne
wynnetom50@gmail.com

Alexander Wilson <arwilson926@gmail.com>

Tue, Dec 12, 3:45 PM (3 days ago)

to me

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,

Alexander Wilson
13 Brant Lake Estates Loop Rd, Brant Lake, NY 12815

Tue, Dec 12, 6:05 PM (3 days ago)

Danny Bernstein <danny@byardsports.com>
to me

Dear Mr. Ziemann

My name is Daniel Bernstein. I am a full time resident at 60 Horicon Birches in Brant Lake, NY.

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Danny Bernstein

60 Horicon Birches
Brant Lake, NY 12815
danny@byardsports.com
Cell: 914-393-0585
Home: 518-803-4311

Tue, Dec 12, 7:05 PM (3 days ago)

Christine Arata <chrislarata@gmail.com>

to me

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: December 12, 2023

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I've are very concerned about the Milfoil in the Adirondacks and specifically at Brant Lake. I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

We greatly appreciate your attention to this matter. Thank you

Sincerely,

Christine Cavanna-Arata

55 Brant lake Estates Rd
Brant Lake, NY

**Elizabeth
Bates** <elizabeth.b.bates@gmail.com>
to me

Tue, Dec 12, 9:46 PM (3 days
ago)

12/12/23

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann,

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. From what I know, the Eurasian Water Milfoil has been increasing at alarming rates on our lake. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Is there any other way?

Please help save Brant Lake! I have a 2 year old daughter and I hope she will learn to swim and sail on the lake as I did when I was 4 years old. The lake provides so much beauty, peace, and fun for my family, it would be an utter tragedy to see it decline and become unsafe and toxic.

We have had our family home in Brant Lake and enjoyed for over 35 years. I hope to be able to enjoy and appreciate it for years to come.

Thank you for your time.

Sincerely,

Elizabeth Bates
81 Brant Lake Estates Rd.
Brant Lake, NY

(Currently residing in Hudson, NY)

David Arata <cdarata@gmail.com>

Wed, Dec 13, 9:03 AM (2 days ago)

to me

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. We need someone to be more aggressive in addressing this problem. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective.

Our family has three homes on Brant Lake and we have enjoyed this beautiful area for over 50 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Thank you for your consideration and action.

Sincerely

David Arata
525 River Road
Yardley, PA 19067

From: stevied1@nycap.rr.com <stevied1@nycap.rr.com>

Sent: Monday, December 11, 2023 3:18 PM

To: wynnetom50@gmail.com.

Cc: 'Brant Lake Association' <members@brantlakeassoc.org>

Subject: NY State Adirondack Park Agency Permit Application For ProcellaCor Treatment on Brant Lake NY

Dear Mr. Zieman

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Steven DeCarlo

6822 State Route 8

Brant Lake, NY 12815

Gmail

to me

The letter I sent

Bob

One attachment

Brant Lake

ROBERT G. COLEGROVE

Got it.

Send

East Shore Schroon Lake Association
P.O. Box 206
Adirondack, NY 12808
December 13, 2023

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Dear Mr. Ziemann,

I am writing on behalf of the Board of Directors of the East Shore Schroon Lake Association who support the application for treating 5 areas of Brant Lake with ProcellaCor. Brant Lake is a neighboring lake to Schroon Lake and has occasion to share recreational boaters. Eurasian Water Milfoil is a harmful aquatic invasive that threatens many lakes in the Adirondack Park and the spread of this plant by contaminated boats presents a risk to Schroon Lake and other local lakes. Many of our members are residents of the Town of Horicon, where Brant Lake is located, and their taxes are used in the fight to return Brant Lake to its original quality. As a Lake Association, we are following the results of ProcellaCor treatments in other lakes and have been encouraged by the results. We encourage the approval of Brant Lake's permit application.

Very truly yours,

Robert G. Colegrove
President

acts

Contacts

ROBERT G COLEGROVE
r.colegrove@abcglobal.net

Tom Wynne
wynnetom50@gmail.com

From: Brad Williams <bwinct@aol.com>

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

Date: December 9, 2023 at 7:29:16 AM EST

To: wynnetom50@gmail.com

Dear Mr. Zieman

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 30 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely

Brad Williams

7060 State route 8, Brant Lake, NY

Chris Pollari <cpollari@yahoo.com>

Thu, Dec 14, 8:16 PM (2 days ago)

to me

Mr. Ziemann:

I write to you in support of the Brant Lake Association's application to treat Brant Lake with ProcellaCor. It appears to be a very effective treatment for Eurasian Water Milfoil, a species that is threatening Brant Lake's water quality.

The BLA has been aggressively working to reduce the milfoil through hand-harvesting. While it was an appropriate approach for several years, it has been unable to stop the milfoil growth. ProcellaCor is the next best step. I believe it will have a positive impact on the Lake.

My family has had a house on Brant Lake for over 50 years; the quality of the water is of paramount importance in our enjoyment of the Lake and we wish to do whatever is needed to keep the Lake clear of milfoil. We have regularly contributed to the milfoil mitigation fundraising by the BLA and will do so in the future.

Thank you for considering the application; I strongly urge you to grant you approval.

Sincerely,

Chris Pollari
Brant Lake, NY and Boston, MA

From: asinger5656@gmail.com <asinger5656@gmail.com>

Sent: Thursday, December 14, 2023 7:56 PM

To: wynnetom50@gmail.com

Cc: 'Brant Lake Association' <members@brantlakeassoc.org>

Subject: WE SUPPORT the Permit Application For ProcellaCor Treatment on Brant Lake NY

Hello Tom,

Harriet and I are in total support of the BLA application for permission to use ProcellaCor. It's safety and its effectiveness have been well established and it is time for Brant Lake to have the benefit of the product.

We look forward to the application's swift approval.

Best regards,
Andy and Harriet Singer

c/o Andrew J. Singer
1390 Palisades Road
Brant Lake, New York 12815
917-414-0100 (cell)

Howard Lebowitz <hlebowi2@me.com>

Sun, Dec 17, 7:32 AM
(3 days ago)

to me

12/17/2023

Mr Zieman,

I have been a property owner with direct lake access on Brant Lake since 2012. My cove is one of the milfoil "hot spots" that the Brant Lake Association (of which I am a member) has spent most of those years of my ownership trying to get ahead of the invasive species by hand harvesting the worst areas.

That does not appear to be a winning strategy anymore.

I am writing in support of the proposed ProcellaCor treatment of Brant Lake, as it appears it will be safe and effective.

Please do not let Brant Lake die.

Sincerely,
Howard Lebowitz
6957 State Route 8
Brant Lake, NY, 12815
518-321-3565

Tue, Dec 19, 3:38 PM
(18 hours ago)

camilledougan@aol.com <camilledougan@aol.com>

to me

12/19/23

Mr. Aaron Ziemann
NYS Adirondack Park Agency

Dear Mr. Zieman:

I have been a summer resident of Brant Lake for over 70 years. Never have I seen the increased rate of Eurasian Water Milfoil infestation as it has been recorded in the last 15-20 years. Our Lake Association has been active with both volunteers & professional divers for many years but is not winning the battle. I am writing to say that I fully support the application for treating 5 areas of Brant Lake with ProcellaCor..

Sincerely,
Camille Dougan

From: [Howard Lebowitz](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Project # 2023-0037
Date: Saturday, March 18, 2023 11:20:08 AM

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Aaron,

I have owned a piece of property off of Route 8, in one of the proposed treatment zones on Brant Lake for 12 years. I have witnessed the milfoil and other vegetation issues worsen. I am writing in support of using ProcellaCOR EC in those zones.

Sincerely,
Howard Lebowitz
6957 State Route 8
Brant Lake, NY 12815
518-321-3565

From: noreply-pc@apa.ny.gov
To: [APA Regulatory Programs Comments](#)
Cc: beldenjo@gmail.com
Subject: APA Project 2023-0037 Public Comments
Date: Saturday, January 27, 2024 1:06:02 PM

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***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0037, Jeffrey O. Belden, beldenjo@gmail.com" into your message for our reference.

Attn: Aaron Ziemann
Comments from: Jeffrey O. Belden
Email from: beldenjo@gmail.com
Address: 64 Horican Birches Rd Brant Lake
Re: Agency Project 2023-0037, Brant Lake Foundation

My Comments:

As a lakeside vacation property owner on Brant Lake, I cannot overstate how strongly I support this proposed milfoil remediation effort spearheaded by the Brant Lake Foundation.
Jeff Belden

From: noreply-pc@apa.ny.gov
To: [APA Regulatory Programs Comments](#)
Cc: kayla.carlozzi@gmail.com
Subject: APA Project 2023-0037 Public Comments
Date: Saturday, January 27, 2024 8:46:36 AM

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***** PLEASE NOTE *****

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0037, Kayla Carlozzi, kayla.carlozzi@gmail.com" into your message for our reference.

Attn: Aaron Ziemann
Comments from: Kayla Carlozzi
Email from: kayla.carlozzi@gmail.com
Address: 146 Grassville Rd Brant Lake NY 12815
Re: Agency Project 2023-0037, Brant Lake Foundation

My Comments:

This is an excellent partnership between the association and the town to promote the health and longevity of the Brant Lake. This is a huge undertaking and we (as residents of Brant Lake) are extremely lucky and fortunate to have an association that is dedicated to controlling the milfoil in Brant Lake.

From: noreply-pc@apa.ny.gov
To: [APA Regulatory Programs Comments](#)
Cc: Brantlakedan@gmail.com
Subject: APA Project 2023-0037 Public Comments
Date: Saturday, February 10, 2024 4:41:37 PM

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***** PLEASE NOTE *****

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0037, Daniel Larson, Brantlakedan@gmail.com" into your message for our reference.

Attn: Aaron Ziemann
Comments from: Daniel Larson
Email from: Brantlakedan@gmail.com
Address:
Re: Agency Project 2023-0037, Brant Lake Foundation

My Comments:

My family owns property on Brant Lake. The decline in water quality and increase in Eurasian Milfoil has been rapid over the past few years. I wholeheartedly support the use of ProcellaCOR. My biggest concern is that the project is too limited in scope and I hope that it expands in future years. There are many areas of large milfoil beds that are outside the designated treatment zones.

From: noreply-pc@apa.ny.gov
To: [APA Regulatory Programs Comments](#)
Cc: mlindsay2@nycap.rr.com
Subject: APA Project 2023-0037 Public Comments
Date: Wednesday, January 31, 2024 12:12:46 PM

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***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0037, Martin A Lindsay, mlindsay2@nycap.rr.com" into your message for our reference.

Attn: Aaron Ziemann
Comments from: Martin A Lindsay
Email from: mlindsay2@nycap.rr.com
Address: 182 S Pine Ave Albany 12208
Re: Agency Project 2023-0037, Brant Lake Foundation

My Comments:

If I read the map correctly, the plan is to apply the chemical to areas that currently have no milfoil; any potential negative side effects must be carefully explored.

From: noreply-pc@apa.ny.gov
To: [APA Regulatory Programs Comments](#)
Cc: kschae52@aol.com
Subject: APA Project 2023-0037 Public Comments
Date: Sunday, January 28, 2024 12:25:07 PM

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***** PLEASE NOTE *****

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If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0037, Kenneth Schaeffer, kschae52@aol.com" into your message for our reference.

Attn: Aaron Ziemann
Comments from: Kenneth Schaeffer
Email from: kschae52@aol.com
Address: 17 Brant Lake HTS. Ext. Brant Lake 12815
Re: Agency Project 2023-0037, Brant Lake Foundation

My Comments:

As a resident of Brant Lake I
fully support this project.

From: noreply-pc@apa.ny.gov
To: [APA Regulatory Programs Comments](#)
Cc: drsmith1155@gmail.com
Subject: APA Project 2023-0037 Public Comments
Date: Monday, January 29, 2024 7:15:05 PM

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***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0037, David R. Smith, MD, drsmith1155@gmail.com" into your message for our reference.

Attn: Aaron Ziemann
Comments from: David R. Smith, MD
Email from: drsmith1155@gmail.com
Address: 15 Hill Side Drive Brant Lake NY 12815
Re: Agency Project 2023-0037, Brant Lake Foundation

My Comments:

I am a year round resident of Brant Lake, and as a physician and former Commissioner of Health for Texas I am entirely in favor of the application of ProcellaCor to the designated areas of the lake. As a member of the Brant Lake Association and donor to our repeated attempts to improve our aquatic habitat I support this effort. I have seen the impact of other applications of aquatic herbicides and their effectiveness and protection of fragile native infrastructure. I would be willing to provide real time input if required.

David R. Smith, MD

From: [Paul Matson](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Project 2023-0037
Date: Friday, March 24, 2023 9:13:11 AM

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

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

Mr. Ziemann, I am opposed to using any herbicide in Brant Lake. We have heard so often, since the advent of the use of chemicals, that these products are safe and harmless, only to find many years later of negative effects on plant, insect, animal and human communities. Please reject this application.

Paul Matson
1229 Valentine Pond Rd
Adirondack, NY 12808

From: [John Husband](#)
To: [APA Regulatory Programs Comments](#)
Cc: [Tara Husband](#); [Oasis Husband](#)
Subject: APA Project No. 2023-0037
Date: Monday, April 3, 2023 10:33:24 PM
Attachments: [image001.png](#)

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

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

Dear Mr Ziemann,

Many of us are concerned about swimming in Brant Lake during and after the application of ProcellaCOR EC. Out of the abundance of caution will be me informed as to when the herbicide will be applied and when no detectable trace of the chemical remains in the water?

Vr,

-John Husband

John Husband

MACC Center of Excellence
North America Marketing & Operations, Microsoft

P: +1 (561) 601-3883 | E: jhusband@microsoft.com



.....Customer Success

From: [Robert Lewit](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA PROJECT NO. 2023-0037
Date: Wednesday, March 15, 2023 9:42:30 PM

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

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

To: Mr. Aaron Ziemann

As homeowners of two adjacent properties with approximately 300 feet on Brant Lake, we fully endorse the use of ProcettaCOR EC as a targeted underwater herbicide to eradicate/control the Eurasian Milfoil on our vulnerable lake.

Robert Lewit, Managing Partner, Adirondack Hills
Phoebe Olhava, Benjamin Lewit, Abigail Ford

--

Robert Lewit 240-543-9250
rtlewit@gmail.com

From: [Paul](#)
To: [APA Regulatory Programs Comments](#)
Subject: APA Project No. 2023-0037
Date: Saturday, January 27, 2024 5:05:28 PM

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

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

Dear Aaron,

I just received the public notice on the above project and was wondering if any consideration has been made on treating the runoff of Brant Lake. While traversing these waters last year I noticed a considerable amount of Eurasian watermilfoil entangling around the native plants.

Let me know your thoughts on this.

Thanks,
Paul Marion

From: [Carole Hunt](#)
To: [APA Regulatory Programs Comments](#)
Subject: apa project no. 2023-0037
Date: Wednesday, March 15, 2023 1:28:02 PM

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

For the Glory...

Dear Aaron,

We are in receipt of your March 8, 2023, notice...Thank you...We are sure you will be aware of the questions concerning anything added to our lakes, rivers, streams, etc...which might in the future cause harm to the humans, animals, fish, plant life that are living in or around Brant Lake...Lake George/ Hague is questioning the addition of this product to their waters...
Where there's smoke there's fire...(dioxins?)

Sincerely,
Richard Tynebor, Brant Lake
Carole Hunt, Brant Lake

From: [Beth A Ernest](#)
To: [APA Regulatory Programs Comments](#)
Subject: Brant Lake APA Project No. 2023-0037
Date: Friday, February 9, 2024 12:53:59 PM

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

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

Hello,

I am writing in support of the above referenced APA project which covers the application of the aquatic herbicide ProcellaCOREC in Brant Lake. My family and I have owned a home on Brant Lake at 4 Horicon Birches since 1951.

Despite the extensive hours spent harvesting and monitoring the milfoil in the lake and the large amount of money spent doing so, the problem is getting much worse. I believe that the members of our Brant Lake Association have done their due diligence in researching options, investigating outcomes of the herbicide application, and distributing their findings to the Brant Lake community. I attended one of several community meetings this summer and it was well attended with plenty of opportunity for residents to comment.

I urge you to approve this project. I truly believe that without the application of the herbicide, the quality of the lake and the quality of life on the lake will continue to decline. Just harvesting the milfoil will not keep up with its growth and the milfoil will continue to overtake increasingly large areas of the lake.

Thank you for your consideration.

Beth Ernest

From: [Jenifer E Nichols](#)
To: [APA Regulatory Programs Comments](#)
Subject: Brant Lake APA Project no. 2023-0037
Date: Friday, February 9, 2024 4:19:55 PM

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

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Hello,

I am writing in support of the above referenced APA project which covers the application of the aquatic herbicide ProcellaCOREC in Brant Lake, NY. My family and I have owned a place on Brant Lake for over 70 years now and we are very concerned with the enormous amount of milfoil growth that has occurred in a very short period of time.

The Brant Lake Association has done a tremendous amount of work and research exploring different options to combat the growing milfoil problem in Brant Lake. They have been monitoring and harvesting the milfoil in Brant Lake for many years now, unfortunately, they are unable to keep up with this quickly growing invasive species. I respectfully ask that you approve this project. I believe the best option for Brant Lake is to use this herbicide as soon as possible for without this treatment I believe the quality of the lake will decrease significantly in a short amount of time.

Thank you for your time and consideration.

Jenifer Nichols

From: [Stephenie Neufeld](#)
To: [APA Regulatory Programs Comments](#)
Subject: Brant Lake Foundation project
Date: Saturday, April 1, 2023 11:50:48 AM

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

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Hey there,

so the underwater area designated as a new project is doing what exactly? It looks as though the project will be adjacent or on my mother's property. Just please send me a link or simple comment regarding the What and When.

Thank you in advance
Stephenie Morse Neufeld.
Accent On Communication, LLC
9 Main Street
Sparta, New Jersey 07871
973.729.1151

CONFIDENTIALITY NOTICE

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From: [Larry](#)
To: [APA Regulatory Programs Comments](#)
Subject: Brant Lake herbicide
Date: Monday, February 12, 2024 9:32:46 AM

Some people who received this message don't often get email from lorenzo5755@gmail.com. [Learn why this is important](#)

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

Sirs:

I am a homeowner on Brant Lake and wish to register my complete support for the application of ProcellaCOR as a means to combat the very real problem that we have been facing with the Eurasian watermilfoil invasion of our lake. I do hope that the application process is speedily approved and executed.

Sincerely,

Lawrence Sanders
90 Ridge Road
Rensselaer NY 12144

1294 Palisades Road
Brant Lake, NY 12815

Sent from [Mail](#) for Windows

From: [CS](#)
To: [APA Regulatory Programs Comments](#)
Subject: Brant Lake Project #2023-0037
Date: Friday, March 17, 2023 2:58:57 PM

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

To: Aaron Ziemann

We are opposed to the treatment of Brant Lake with ProcellacorEC.

ProcellacorEC Specimen Label by Seapro states that it is to be used in “slow, moving/ quiescent waters with little or no continuous outflow.” Brant Lake is not quiescent or slow moving. The waves created by the wind and boats along with the natural current will result in the herbicide being spread to other parts of the lake and beyond. Brant Lake flows into the Mill Pond and then into the Schroon River. Many houses use the Mill Pond for their drinking water.

“Treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants, which may cause fish suffocation.” Resistant biotypes may develop and may not be controlled by this product.

Other aquatic plants such as the water hyacinth, water lilies, American lotus, water primrose, floating heart will be affected by the herbicide. Water birds such as the loons, ducks and blue heron may also be affected. The whole ecosystem of the lake will be affected.

The time of application during May and June can expose humans swimming in the water, water skiing, wakeboarding, to this herbicide. We are afraid of potential health consequences which could affect people now or in the future.

There are no quarantines that this herbicide is 100% safe.

Carol and Greg Salyer
23 Chippewa Loop
Brant Lake, NY 12815

Mailing Address:
Carol and Greg Salyer
22 Argent Drive
Poughkeepsie, NY 12603

From: [Benjamin Lewit](#)
To: [APA Regulatory Programs Comments](#)
Subject: Brant Lake
Date: Wednesday, January 31, 2024 12:37:28 AM

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

Mr. Zimmerman:

Please go forward with the application of procellacor to the necessary areas of Brant Lake.

This is the best option and not doing it is certain to increase milfoil damage to the lake.

Best regards
Ben Lewit

From: [Joe Gensheimer](#)
To: [APA Regulatory Programs Comments](#)
Cc: Supervisor@horiconny.gov; k9fitzpatrick@hotmail.com
Subject: Citizen Response on APA Project NO. 2023 0037
Date: Sunday, April 2, 2023 10:31:26 PM
Attachments: [March 8 2023 APA Letter to Brant Lake Homeowners.pdf](#)

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Cynthia and Joe Gensheimer
7711 State Route 8
Brant Lake, NY 12815

March 31, 2023

Re: Application of the aquatic herbicide ProcellaCOR EC with five treatment zones in Brant Lake, to control Eurasian watermilfoil
Sent by email to: rpcomments@apa.ny.gov

Dear Mr. Aaron Ziemann:

We received the attached Major Project Public Notice APA Project No. 2023-0037 for the application of ProcellaCOR EC on Brant Lake to control Eurasian milfoil in Brant Lake by mail on March 30.

As homeowners on Brant Lake, we strongly favor using ProcellaCOR EC to control Eurasian milfoil. Previous efforts using mats and hand-harvesting have not worked despite much time and money being spent, and Eurasian milfoil will ruin Brant Lake unless it is eliminated soon. Although we have no official status with any group or agency, we have independently researched various means of controlling milfoil in Brant Lake and have concluded that applying ProcellaCOR will be entirely safe and very effective. We have been enjoying Brant Lake for 39 years, and have owned our current house on the lake since 2018, with 150 feet of direct waterfront. We love Brant Lake and would never recommend any treatment that we felt would have any risk for the lake or its residents. We do not take the word of others lightly, however, and set out below our own research on the use of ProcellaCOR. We would be happy to testify in any hearing related to this application.

Our more detailed views of ProcellaCOR's effectiveness and lack of toxicity are set out below. And, of course, ProcellaCOR EC is approved by the APA, EPA, and NYDEC.

Use at Saratoga Lake

I (Joe) spoke to Christina Connolly on June 23, 2022 (518-223-3252) about the application of ProcellaCOR EC on Saratoga Lake. Ms. Connolly is the paid administrator for the Saratoga Lake Protection and Improvement District ("SLPIA"). The SLPIA was created in 1986 through NYS legislation. Previously it had been a taxing district created in 1971 as a sewer district. Ms. Connolly was a commissioner from 2014-2019 and now is a paid administrator.

The SLPIA has treated Saratoga Lake with ProcellaCOR which completely eliminated milfoil without harming native plants. They have not applied ProcellaCOR this year nor last year as there has been no milfoil found in Saratoga Lake in the last two years. Of course, they also didn't have to pay to hand harvest milfoil either. The SLPIA applied for permits for ProcellaCOR from the NYDEC which were readily granted. The SLPIA asked for public comments before applying ProcellaCOR but got none. We think that the SLPIA application is a real model for Brant Lake regarding the use of ProcellaCOR.

We also know that ProcellaCOR EC has been effective at Chautauqua Lake, Glen Lake and Minerva Lake in New York with no adverse effects. It is approved in Massachusetts and has been used there, but we couldn't find out in which lakes. Vermont has used it at least 18 times, and New Hampshire at least 43 times with no adverse effects.

ProcellaCOR is safe

As many lakes in the US have found, the best plan to eradicate Eurasian milfoil is chemical eradication, and the best chemical is ProcellaCOR EC. There should be no issue with using ProcellaCOR in Brant Lake as it has been thoroughly tested, found harmless to humans and mammals and fish, and extensively used throughout the Northwest, especially in the progressive states of Washington and Oregon, and in states such as Massachusetts, New York, Vermont and New Hampshire. And it's only 7 parts per billion of active ingredient in the lake, and that ingredient disappears in a day or so.

As the Massachusetts Department of Environmental Protection noted in approving the use of ProcellaCOR EC, the ProcellaCOR EC formulation exhibited very low acute mammalian toxicity via oral and dermal routes. No mortality was observed following oral and dermal treatment of rats with 5000 mg product/kg body weight. The acute oral and dermal LD50 was >5000 mg/kg and classified in the **lowest toxicity category** (Category IV). A 4-hour inhalation study with rats indicated very low toxicity (Category IV) with an LC50 of >5.4 mg/L. Mild or slight eye irritation was observed in a study with rabbits and cleared by 72 hours (Category III). There was no evidence of any potential for skin irritation or skin sensitization in studies with rabbits and guinea pigs, respectively.

As to effects on fish, in the study with the EC formulation on common carp no mortalities were observed. As to aquatic invertebrates, the EC formulation is moderately toxic to water fleas. The EC formulation was tested on two species of marine invertebrates. An acute shell-deposition study with Eastern oyster indicated a non-definitive IC50 of >0.270 mg a.i. equivalent/L. No additional sub-lethal effects were observed. Testing with mysid shrimp established a non-definite LC50 of >0.370 mg a.i. equivalent/L. No sublethal effects were observed. Comparison of the maximum label application rate of 0.050 mg a.i. equivalent/L (50 ppb) with the endpoints for fish and invertebrate species reviewed above indicates that there is low potential for acute effects to these species.

Lake George Injunction

Although it does not apply to Brant Lake or anywhere else except Lake George, we want to address a two week preliminary injunction issued by Warren County Supreme Court Judge Robert Muller on June 13, 2022, against its use by the Lake George Park Authority. [The Lake George Association et al](#)

v. The NYS Adirondack Park Agency et al, case EF2022-70178. Judge Muller granted the preliminary injunction despite the APA's, EPA's, NYDEC's approval and the extensive scientific evidence of no harm from its use in both eastern and western states.

In reading the opinion, it is clear Judge Muller ignored all the scientific evidence to issue a preliminary injunction. He quotes extensively from a paid biased opinion by Carol D. Collins whose March 31, 2022 letter is not based on scientific evidence but pure speculation inconsistent with the testing done with ProcellaCOR EC (falsely claiming there will be significant impacts to native macrophytes and organisms, and that using it will cause algae growth and algae blooms, which of course occur naturally when the milfoil dies in the winter).

Judge Muller also relies on the fact that hand harvesting had not been done in the two areas of Lake George where ProcellaCOR would be applied for five and eight years respectively and maybe it will now be more effective. At Brant Lake, we have hand harvested for years including 2022 and it has not been effective. Judge Muller also doesn't understand the science. He says there is no removing the chemical from Lake George once it has been introduced. But it deteriorates and is gone on its own in a day, so it is almost immediately gone. In any case, Lake George takes years to turn over its water; Brant Lake changes its water in days due to its being basically a dammed stream.

In sum, we fully support the application of ProcellaCOR EC in Brant Lake, the sooner the better.

Sincerely,

Joe and Cynthia Gensheimer
7711 State Route 8
Brant Lake, NY 12815
816-210-0500

cc: Town of Horicon, supervisor@horiconny.gov
Brant Lake Association, John Dunn, k9fitzpatrick@hotmail.com

From: [Donna Sickler](#)
To: [APA Regulatory Programs Comments](#)
Cc: [Donna Sickler](#)
Subject: Fwd: Fw: Brant Lake APA Project no. 2023-0037
Date: Saturday, February 10, 2024 12:47:37 PM

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Good afternoon,

I am writing in support of the above referenced APA project which covers the application of the aquatic herbicide ProcellaCOREC in Brant Lake. My husband and I have owned a home on Brant Lake at 1270 Palisades Road for over 10 years.

Despite the extensive hours spent harvesting and monitoring the milfoil in the lake and the large amount of money spent doing so, the problem is getting much worse.

I believe that the members of our Brant Lake Association have done their due diligence in researching options, investigating outcomes of the herbicide application, and distributing their findings to the Brant Lake community. I attended one of several community meetings this summer and it was well attended with plenty of opportunity for residents to comment.

I urge you to approve this project. I truly believe that without the application of the herbicide, the quality of the lake and the quality of life on the lake will continue to decline. Just harvesting the milfoil will not keep up with its growth and the milfoil will continue to overtake increasingly large areas of the lake.

Thank you for your consideration.

Donna Sickler



02/13/2024

Ian Gaddy

Introduction

I am writing to inquire about some concerns about the application to ProcettaCOR EC in Brant Lake. I have been observing Brant Lake above and below the lake for my whole life through fishing, snorkeling, scuba diving, and surveying. I have derived some points from my knowledge of the local ecosystem and outside sources to dive deep into the application of ProcettaCOR on Brant Lake. Leaders within the Brant Lake Association are set on the use the aquatic herbicide within the 2024 summer. I want to ensure this is the best management tool for the long-term management of Eurasian milfoil. Being an environmentalist and applying herbicides in my field of work within wetlands I wanted to ask questions about the application possibility of negatively affecting the ecological function of Brant Lake. ProcettaCOR EC can pose a greater impact on the health of Brant Lake compared to not applying the aquatic herbicide. Due to the complexity of this issue, I divided my questions into five main concerns. The five concerns include:

- ❖ Loss of Native Plant Habitat for Aquatic Wildlife
- ❖ Potential for Herbicide Drift
- ❖ Increase nutrient Load entering the Lake with less overall macrophytes in the Aquatic System
- ❖ Lack of Toxicity testing Representing Sensitive Aquatic Invertebrates Communities living in Sediment near and below application.
- ❖ Lack of plan post application to change plant communities in the future with the threat of re-establishment of Eurasian Milfoil.

Background

I currently work within the environmental field and hold a bachelor's in environmental management from Cobleskill. My two seasons of experience stem from my monitoring, educating, and hand harvesting of Eurasian/Variable leaf watermilfoil on Brant Lake, along with other water bodies from my time at Aqaulogic. I have conducted aquatic early detection surveys, report writing, and characterizing the severity of invasive impacts. For the past two seasons, I have been an employee at Resource Environmental Solutions, currently the largest ecological restoration company in the United States. My time with this company has given me a strong background in terrestrial and wetland land management. Much of the scope of the work is habitat monitoring/surveying and invasive species control. Working as a restoration technician was spent carrying out the boots-on-the-ground field activities, seeing firsthand the successes and failures of wetland and terrestrial vegetation management. Most of my work was spent using management tools including herbicide application, mowing, other physical removal, replanting, and reseeding for a multitude of different habitats and ecosystems. I include my background to show where much of my area of practical comes from along with where my ecological consciousness has been formed.

Five Reasons

Loss of Native Plant Habitat for Aquatic Wildlife

When considering the use of an aquatic herbicide you must look at the current plant community present to see if there are any conflicts non-target species toxicity to ProcellaCOR EC. It is best not to have non-target species on the control list or closely related to species on the control list that may affect native plant life. In the case of the use of procellaCOR EC on Brant Lake, there are three native milfoils and one native species commonly known as coontail that are at risk of showing toxicity effects during ProcellaCOR EC application. The ProcellaCOR EC is shown to be quite selective towards most aquatic plants, leaving many species of plants unharmed. This does not mean all native species are truly safe during the application, a select few species show the possibility of exhibiting toxicity from procellaCOR application.

According to an aquatic plant survey of Brant Lake carried out by the Darrin Fresh Water Institute the three native milfoil present within Brant Lake are *Myriophyllum tenellum* (Leafless Milfoil), *Myriophyllum alterniflorum* (Alternate-flowered Water-milfoil), and *Myriophyllum sibiricum* (Northern Milfoil) (Brant Lake Plant Survey 1999 n.d.). These three milfoil species are closely related within the same Genus as the Eurasian milfoil. The diversity and aquatic habitat the native milfoils provide for Brant Lake are at risk with the application of procellaCOR through non-target effects. I am concerned with the effect of ProcellaCOR EC effect on native milfoils due to the active ingredient 2-Pyridinecarboxylic acid's proven effects on Eurasian Milfoil. From searching the NYS pesticide portal, there are additional labels from the use of procellaCOR EC for the control of *Myriophyllum sibiricum* (Northern Milfoil), further proving the toxicity to a native species that provides needed ecosystem services to Brant Lake. There are cases where *Myriophyllum sibiricum* (Northern Milfoil) and *Myriophyllum spicatum* (Eurasian Milfoil) hybridize creating a further issue. More research on the genetics of the milfoil issue on Brant Lake should be done to better understand the issue at hand, and see if there is a need for herbicide application. This would also be useful in better identifying, reporting, and minimizing negative impacts through misuse of management tools.

Another concern is procellaCOR harming the populations of *Myriophyllum alterniflorum* (Alternate-flowered Watermilfoil) due to the state protection level of a threatened species. Alternate-flowering Watermilfoil is known to be present in the lake and needs to be protected being categorized as a S2 state conservation status rank. S2 ranks mean that the species is imperiled in New York - Very vulnerable to disappearing from New York due to rarity or other factors; typically 6 to 20 populations or locations in New York, very few individuals, very restricted range, few remaining acres (or miles of stream), and/or steep declines (Alternate-flowered Water Milfoil Guide - New York Natural Heritage Program n.d.). It is known that alternate-flowered watermilfoil is a shelter for aquatic insects and small fish but is overall understudied. According to the NYS heritage program, a major conservation threat to the species currently is the use of aquatic herbicides to control *Myriophyllum spicatum* (Alternate-flowered Water Milfoil Guide - New York Natural Heritage Program n.d.). The use of procellaCOR EC

has the potential to threaten the existence of a rare species existence within Brant Lake if applied. I believe this issue is being overlooked and needs to be surveyed for more to ensure the non-target damage from an application.

My next concern for native plants is the presence of *Ceratophyllum demersum* (Coontail) in Brant Lake and being on the control list within the pesticide label. The use of procellaCOR has been shown to negatively affect coontail populations according to a Vermont DEC study on ProcellaCOR EC effect on Aquatic Macrophyte Species Frequency of Occurrence Pre-and Post-Treatment Statistical Analysis. The study looked at the effects of procellaCOR EC within 11 lakes within similar conditions to Brant Lake. Two post-treat aquatic plant surveys were carried out to track the effects on native fauna. Within the treatment survey across the 11 lakes, there was *Ceratophyllum demersum* was the only non-target species to result in a statistically significant difference ($p = 0.039$) post herbicide treatment with an average decrease in post-treatment 2 results (Procellacor Aquatic Macrophyte Species Frequency of Occurrence Pre-and Post-Treatment Statistical Analysis 4-12-22.pdf n.d.). Knowing how this herbicide is toxic to coontail the loss of aquatic habitat effects many other species.

Ecosystem Services of Coontail compiled from Illinois Wildflowers.com (Coontail (*Ceratophyllum demersum*) n.d.)

- ❖ Provides hiding places for small aquatic organisms and its leaves are sometimes grazed by snails. The aquatic larvae of a Crambid moth, the Water Veneer (*Acentria ephemerella*) feed on the foliage of this plant
Food Source for many species of ducks and waterfowl
- ❖ Turtles also feed on this aquatic plant, including the Snapping Turtle (*Chelydra serpentina*), Painted Turtle (*Chrysemys picta*)
- ❖ Aquatic plant is also eaten by a freshwater fish, the Pumpkinseed (*Lepomis gibbosus*).

Potential for Herbicide Drift

Reading through the herbicide label I see some potential conflicts from labeling of the product's usage on the lake. On the first page under product information, it 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". This raises issues because there is an outflow of brant showing potential conflict with the label. Brant Lake has a hydraulic retention of about one year, showing there is flow within Brant Lake that increases likely hood of drift. Another consideration when talking about drift is the number of tributaries flowing into Brant Lake which could increase the likelihood of herbicide drift. 16 official tributaries are flowing into Brant Lake, along with more unaccounted small runoff streams that need to be considered. These tributaries change the movement of water in areas where they enter the lake, 3 of 5 proposed herbicide treatment areas show potential influence from small tributaries to create herbicide drift (three areas are highlighted in Figure 1A below). I think all tributary's flow should

be assessed on how it could change treatment, but most of all consider the outflow of Spuytendival Brook. The measured streamflow at the outlet of the Spuytendival during the sample day in early May was found to be twenty-one cubic feet per second, according to a watershed assessment done by Warren County Soil and Water Conservation District (Brant Lake Watershed Assessment July 2000 n.d.) Depending on precipitation for this coming year, higher velocity flows could create unpredictable drift. When considering herbicide drift, other environmental factors that create water turbulence caused by wind and wave action are also present most days on Brant Lake due to the wind being pushed through the valley. I raise these questions as an NYS pesticide technician myself who understands the hydrology of the lake along with the surrounding area and sees the potential for herbicide drift from environmental conditions.

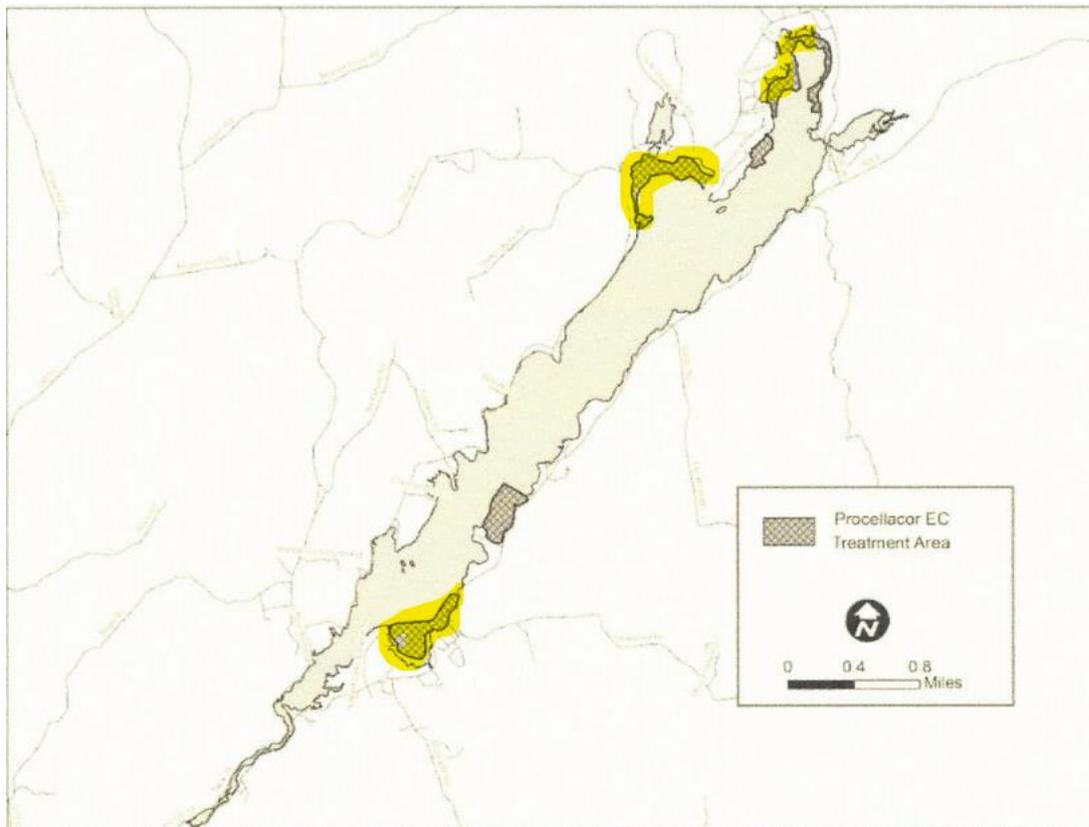


Figure 1A) Proposed ProcettaCOR EC Treatment Areas with Tributary Influence (BLA Letter of Notification)

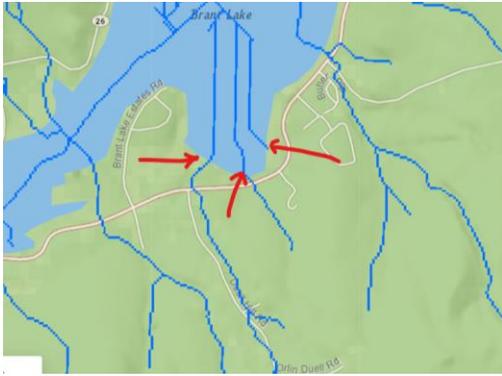
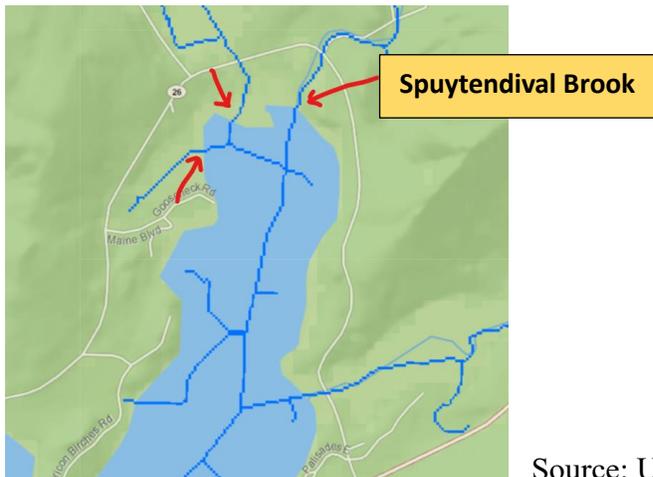


Figure 1B)



Figure 1C



Source: USDAStreamstats

Figure 1D)

Increase nutrient Load entering the Lake.

Dead plant material from the application will increase sediment/nutrient load lake compared to past years. Increases in nutrient loads create issues related to eutrophication, Algae blooms, and oxygen depletion. Outlined on the Herbicide label under environmental hazards it states “Under certain conditions, treatment of aquatic weeds can result in oxygen deletion or loss due to the decomposition of dead plants, which may cause fish suffocation. Water bodies containing very high plant density should be treated in sections to prevent the potential suffocation of fish(ProcellaCOR EC Label 2019 n.d.).

This is one of the largest concerns with aquatic herbicides, especially right at the beginning of the summer when the potential for oxygen depletion increases as water temperatures rise. The herbicide will take out large densities of plant life, native or invasive, that provide the ecosystem service of producing oxygen through photosynthesis. Eurasian Milfoil threatens the lake in some ways but is also a huge source of oxygen for the lake throughout the summer due to photosynthesis, increasing water quality for sensitive species requiring higher levels of oxygen in the warmer months. The combination of dead plant material and a net

negative photosynthesis rate compared to past years from the application creates a recipe for eutrophication that will stress the fisheries along with other aquatic wildlife. Although the Eurasian Milfoil is an invasive plant, it plays a role in also processing excess nutrients coming into the lake through stormwater runoffs, lawn fertilizers, and septic tanks. The site of application will be left barren and all the positive benefits that the Eurasian milfoil provided will be lost with no life plant life to provide the general vital ecosystem service of any aquatic vegetation niche in an ecosystem.

With Eutrophication comes an increased likelihood of harmful algae blooms. Harmful algae blooms have the potential to pollute water sources for all walks of life including humans, polluting and decreasing water quality. Brant Lake is considered a Class AA-Special water body because it is the source of water supply for drinking, food processing, and primary/secondary recreational activities. Within the definition of Class AA-Special water body "These waters shall contain no floating solids, settleable solids, oil, sludge deposits, toxic wastes, deleterious substances, colored or other wastes or heated liquids attributable to sewage, industrial wastes or other wastes" (Lake George: Class AA Special | Lake George Association n.d.). With this definition in mind, the dead plant material left post application is considered settleable solids increasing nutrient load, decreasing water quality on a historically clean lake where some people rely on water for drinking usage. I am very familiar with the area of proposed application areas from scuba hand harvesting, free diving, surveying, fishing, and years of tracking milfoil from my own interests. I can see that post-application there will be a significant amount of organic matter left to decay on the site. I am aware the densities of the proposed application area are high-density patches that will deposit large amounts of nutrients into the aquatic system. I ask the question of how will the ecosystem respond to the influx of decaying plant matter.

Lack of Toxicity Testing Representing Sensitive Aquatic Invertebrates Communities

Benthic aquatic macroinvertebrates are an important group of organisms that help support nutrient cycling, provide natural pest suppression and a major food source for fisheries. There is a lack of research showing the toxicity to sensitive pollution-intolerant aquatic insects. For the herbicide toxicity testing the proxy for all aquatic invertebrates was *Daphnia magna*, *Daphnia* are planktonic crustaceans (Ebert 2005). *Daphnia* and insects are in two completely separate subphyla, question the level of confidence in saying there is no impact on benthic organisms if there is little research to back that claim. Most benthic organisms have never been toxicity tested and often conclusions are drawn for the toxicity effects on aquatic insects based on toxicity tests on a planktonic crustacean. Chronic toxicity to freshwater invertebrates was accomplished with a 21-day chronic test performed on *Daphnia magna*, the most sensitive endpoint from testing was a No Observable Adverse Effect Concentration of 38.5 ppb (ProcellaCor Aquatic Toxicity Review - Agency of Natural Resources Department of Environmental Conservation n.d.). Although there was no observable adverse effect from the tested concentration that does not cover how insects' toxicity levels leave a gap in the data. There is a need for more research into the toxicity to aquatic insects before being applied at such a large scale as what is proposed for the 2024 summer.

Lack of plan post application Management Plant for Eurasian Milfoil

The one conclusion from my field experiences is that when an area's plant composition is dominated by invasive species one-time chemical management will have little effect on long-term management to decrease the invasive species population. Post disturbance from the management, the invasive species will come back unless another native plant fills the same ecological niche. This is due to management tools for eradication of invasive species never fully alleviating the invasive issue no matter what the management tool. Missed plants, root systems, resistant plants, and invasive species seed banks will lead to treated areas being re-established by the invasive plants again. Eurasian Milfoil will dominate the area post invasive species management due to the fragmentation of the plant and lasting seed base. Eurasian milfoil produces up to 112 seeds per stalk and seeds may stay dormant for many years (NSW WeedWise n.d.), killing off current plants will result in more Eurasian Milfoil seed germinating and re-establishing.

I believe there needs to be a plan for native plant establishment so the invasive species will reclaim the treated area or any area hand harvested. Native aquatic plugs are starting to become available and could be used as a management tool for Eurasian Milfoil post removal of a site. Volunteer efforts could be put in place to replant old milfoil beds with native fauna to prevent the re-establishment of Eurasian milfoil, using crowding out through strategic aquatic plantings and constant invasive mapping/proper hand harvesting efforts. Below is a chart showing native aquatic plugs that could be planted post-management of Eurasian Milfoil to decrease the overall area for invasive milfoils to reestablish by filling the niche before regrowth. Post invasive species management disturbance whether it is chemical treatment, benthic matting, or hand harvesting a new management practice could be replanting native aquatic plugs in the area where milfoil was occurring. These plants would not be effective in all areas but should be considered too slow re-establishment of the invasive species. This lake management practice is not often performed but I believe it is a sustainable approach with a long-term goal to increase native plant habitat and overall prevalence over Eurasian milfoil. Below is a chart with five aquatic plant species plugs from nurseries that grow native aquatic plants that could be helpful in shallow to moderate depth replanting invasive species restoration effort areas.

Latin Name	Common Name	Description	Habitat	Nursery
Nuphar luteum	White Water Lily	This water lily provides shade and cover for fish and macroinvertebrates. Waterfowl and wildlife feed on seeds and leaves. Grows in water up to 3' deep	Submerged areas	Herbaceous (newp.com)
Nymphaea odorata	Yellow Water Lily	Growing in water from several inches to 5' deep, this plant provides food and cover for beavers, waterfowl, and other wildlife, and cover for fish and amphibians.	Shallow Water	Herbaceous (newp.com)
Sagittaria latifolia	Nothern Arrowhead/Duck Potato	An important food source for waterfowl. This plant grows along shores and in up to 2' of water. Good for water quality basins. Do not plant in the fall.	Shallow Water, Shore Edges	Herbaceous (newp.com)
Vallisneria americana	Wild Celery	A submerged aquatic plant growing mainly in ponds and calmly flowing waters. A food source for a variety of aquatic creatures. Wild celery has some salinity tolerance, but will grow best with no salinity. Growth 1 to 4 feet	Sandy or mucky underwater soils	Herbaceous (newp.com)
Ceratophyllum Demersum	Coontail	The preference is full sun and relatively clear water up to 9' deep that has adequate levels of nutrients; water pH can be mildly acidic to alkaline. (Coontail (Ceratophyllum demersum) n.d.)	At the water's bottom, the soil should consist of mud, sandy mud, or muddy gravel. Coontail is more tolerant of shade than the majority of aquatic plants and it is able to tolerate some turbidity in the water if it is not excessive	Buy Hornwort, Ceratophyllum Demersum, oxygenating pond plants-- Pond Megastore

(New England Wetland plants n.d.) (Native Pond Plants, Growing Wetland Aquatic Plants & Water Lilies– Pond Megastore n.d.) (Coontail (Ceratophyllum demersum) n.d.)

Conclusion

My motives for writing this are to voice my comments on the proposed ProcettaCOR EC application to protect and make the best management decisions for Brant Lake. My research and drive for knowledge come from a place of interest in solving environmental issues faced by waterbodies I care about. The stability of our water bodies is threatened increasingly by unpredictable climate trends and more invasive species encroaching into local water bodies. I know there are many groups on both sides of the application argument, but regardless of people's side, the ongoing discussion proves residents' willingness to support better lake management altogether. More research and education are a necessity to support better management decisions of our most viable resource, water. I pose these questions to best protect Brant Lake along with furthering my understanding of the issue.

Thank you for taking the time to read my letter and hope to hear from you soon.

Sincerely,

Ian Gaddy

Sources

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Howard Lebowitz <hlebowi2@me.com>

Dec 17, 2023,
7:32 AM

to me

12/17/2023

Mr Ziemann,

I have been a property owner with direct lake access on Brant Lake since 2012. My cove is one of the milfoil "hot spots" that the Brant Lake Association (of which I am a member) has spent most of of those years of my ownership trying to get ahead of the invasive species by hand harvesting the worst areas.

That does not appear to be a winning strategy anymore.

I am writing in support of the proposed ProcellaCor treatment of Brant Lake, as it appears it will be safe and effective.

Please do not let Brant Lake die.

Sincerely,
Howard Lebowitz
6957 State Route 8
Brant Lake, NY, 12815
518-321-3565

camilledougan@aol.com <camilledougan@aol.com>

Tue, Dec 19,
2023, 3:38 PM

to me

12/19/23

Mr. Aaron Ziemann
NYS Adirondack Park Agency

Dear Mr. Ziemann:

I have been a summer resident of Brant Lake for over 70 years. Never have I seen the increased rate of Eurasian Water Milfoil infestation as it has been recorded in the last 15-20 years. Our Lake Association has been active with both volunteers & professional divers for many years but is not winning the battle. I am writing to say that I fully support the application for treating 5 areas of Brant Lake with ProcellaCor..

Sincerely,
Camille Dougan

Mr. Aaron Ziemann

December 22, 2023

NY State Adirondack Park Agency

Dear Mr. Ziemann,

I am writing to express my family's full support for the efforts to treat Brant Lake with ProcellaCor in the Spring of 2024. Our extended family has maintained property on the shore of Brant Lake for over 100 years.

Milfoil has taken over large portions of our beautiful lake, including areas very near our shoreline, and we are most anxious to get it under control. We have watched (and supported) over the years as the dedicated crew has hand harvested to try to get a handle on this, but clearly this is too large a problem for that solution.

We have been following the success of ProcellaCor on other lakes in New York, Vermont and New Hampshire. We appreciate the extensive research that has been done to find the proper solution on a lake-by-lake basis. We understand that at this point, ProcellaCor looks to offer the best solution for our beloved lake. We encourage support of this effort.

Sincerely,

Scott Farr and family
962 Palisades Road
Brant Lake, NY 12815

also

1 Carriage Lane
Hanover, NH 03755

Martha Lester <mstarri@uw.edu>

Thu, Dec 28, 2023,
2:56 PM (8 days ago)

to me

December 28, 2023

Mr. Aaron Ziemann

New York State Adirondack Park Agency

Dear Mr. Ziemann,

I currently live in Seattle, WA, but have been vacationing on Brant Lake in the Adirondacks since I was born (I just turned 70). Brant Lake is the most wonderful special place for our large extended family, and we want to keep it that way.

To that end, I fully support the Brant Lake Association's application to treat five areas of Brant Lake with ProcellaCor. Sadly, Eurasian Water Milfoil (EWM) has spread in Brant Lake as in other Adirondack lakes, seriously threatening the health of the lake. I have attended meetings of the Brant Lake Association and learned of the valiant efforts of many volunteers to hand-harvest Eurasian Water Milfoil, but these efforts are not enough to do the job. In summer 2023, I and other family members attended a meeting of the Brant Lake Association where there was an excellent presentation about EWM and ProcellaCor, covering how ProcellaCor could be used to combat EWM and the science and evidence about its efficacy, safety, and use. I conclude that ProcellaCor is safe and effective and can help restore Brant Lake.

I hope the APA will support the Brant Lake Association's application to use ProcellaCor, and help all of us restore this magnificent resource.

Sincerely,

Martha Lester

1530 2nd Ave. W., Seattle, WA 98119

Subject: Permit Application For ProcellaCor Treatment on Brant Lake NY

January 4, 2024

Mr. Aaron Ziemann

NY State Adirondack Park Agency

Dear Mr. Ziemann

I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. Eurasian Water Milfoil has been multiplying at alarming rates in our lake. The Brant Lake Association has been active with volunteers and professional divers hand-harvesting to combat this invasive for many years.

My family has supported the harvesting program through funding contributions, but we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears to be very safe and very effective. We believe this treatment will make a big difference, and encourage your agency to swiftly approve its use.

My immediate family has had a home on Brant Lake since 1963. All of my father's family members were born and raised around the lake. We have enjoyed the beautiful area in Warren County and Brant Lake for over 100 years. We hope that with your approval for the use ProcellaCor, Brant Lake will continue to be a beautiful place of recreation, which provides economic stability to the surrounding area.

Sincerely,

Timothy J Monroe

248 W Barney St

Gouverneur NY 13642

Date: 1/13/2024

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Dear Mr. Ziemann,

I am writing to state I fully support the application for treating 5 areas of Brant Lake with ProcellaCor. The Eurasian Water Milfoil has been increasing at alarming rates on our lake. Our Lake Association has been active with volunteers and professional diver hand harvesting combating this invasive for many years and we are not winning the battle. I have been following the information on ProcellaCor treatment and in all reports it appears very safe and very effective. Our family has a home in Brant Lake and we have enjoyed this beautiful area for over 15 years. We have supported the harvesting program through volunteering and funding efforts and believe this treatment will make a big difference.

Sincerely,
Eileen Hellmuth
14 Florida Avenue
Rensselaer, NY 12144

Brant Lake address:
18 Independence Avenue
Brant Lake NY 12815

December 12, 2023

Mr. Aaron Ziemann
NY State Adirondack Park Agency

Subject: Permit Application for ProcellaCor
Treatment of Brant Lake

Dear Mr Ziemann;

I am writing in support of the application of the ProcellaCor treatment at the five locations on Brant Lake indicated in the above permit request.

My wife and I have been summer residents on Brant Lake for the last 48 years. I am an avid fisherman. Catch and release only. I mainly fish where there are weeds and have enjoyed many great fishing experiences. However, it is apparent that the growth of the Eurasian Water Milfoil is quickly overtaking areas of Brant Lake.

The Brant Lake Association of which I am a member has tried to control the milfoil weed growth through matting areas and underwater harvesting but it appears that all their efforts are gaining little on the problem. I have been assured that the ProcellaCor treatment will not harm the fish population in the lake.

I am hopeful that this permit application will be approved so that the next generation can enjoy our beautiful lake in the future.

Best regards,

Doug Spring
4 Constitution Drive
Meads Campgrounds
Brant Lake, NY

From: [Joe Gensheimer](#)
To: [APA Regulatory Programs Comments](#)
Subject: ProcellaCOR EC Application to Brant Lake
Date: Wednesday, December 13, 2023 9:37:48 PM
Attachments: [Response to APA Letter of March 8 2023 re ProcellaCOR.docx](#)

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

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

Cynthia and Joe Gensheimer

7711 State Route 8

Brant Lake, NY 12815

December 11, 2023

Re: Application of the aquatic herbicide ProcellaCOR EC with five treatment zones in Brant Lake, to control Eurasian watermilfoil

Sent by email to: rpcomments@apa.ny.gov

Dear Mr. Aaron Ziemann:

We received a letter of notification dated November 20 today, December 11, in our US Mail, re Proposed Invasive Aquatic Plant Management Program—Brant Lake. It is to notify us of the proposed application of ProcellaCOR EC on Brant Lake to control Eurasian milfoil in Brant Lake.

As homeowners with 150' of waterfront on Brant Lake, we strongly favor using ProcellaCOR EC to control Eurasian milfoil. Previous efforts using mats and hand-harvesting have not worked despite much time and money being spent, and Eurasian milfoil will ruin Brant Lake unless it is eliminated soon. My wife Cynthia swims every day in Brant Lake from June through September, rain or shine, and she is fully in support of this application as she knows ProcellaCOR EC poses no potential for harm to humans.

I wrote a letter to you (attached) on March 31 of this year supporting the application of ProcellaCOR EC for the spring of 2023. We are very sad that it was not applied and hope it will be applied this spring of 2024. Rather than repeat our arguments in support, I have attached my March 31 letter to this one.

I would add one point that I had not included in my letter of March 31. I had mentioned that I spoke to Christina Connolly of Saratoga Lake Protection and Improvement District and her firm support for the use of ProcellaCOR EC. What I didn't mention was that I had spoken to one of the harvesters on Saratoga Lake who uses the rotary weed harvesting machine about ProcellaCOR. He said he didn't like it because unlike other treatments, it only killed Eurasian milfoil, not native intrusive plants! To me that is the best endorsement of ProcellaCOR I have heard.

Joe and Cynthia Gensheimer

joegensheimer@gmail.com



Board of Directors

February 15, 2024

Charles Clusen
Chair

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

James McMartin Long
Michael Wilson
Vice-Chairs

Barbara Rottier
Secretary

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

David Quinn
Treasurer

Dear Aaron:

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

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

Staff

Peter Bauer
Executive Director

The presence of EWM was first discovered in Brant Lake in the late 1980s and has been managed with benthic mats, suction harvesting, hand harvesting, education and boat steward programs since that time. The use of an herbicide known by the brand name of SONAR was considered but never used. Of all the treatment methods, hand-harvesting has proven the most successful over the years, especially by utilizing large, trained diving crews. The high cost and intensive labor involved are the main drawbacks of hand-harvesting, but it's highly effective at reducing EWM sites and limits disturbance of native aquatic plant populations. Unfortunately, EWM is an invasive plant that will never be fully eradicated from our waters. Once a lake is infested, the most successful efforts have strived to contain it with regular management. This is the reality on Brant Lake, just as it is in many Adirondack lakes. EWM control with active management is a fact of life that must be continued year after year.

Claudia K. Braymer, Esq.
Deputy Director

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

Protect the Adirondacks

PO Box 48, North Creek, NY 12853 518.251.2700

www.protectadks.org info@protectadks.org

Follow Us on Instagram and Threads @ProtectAdkPark and Like Us on Facebook

EWM on Brant Lake: The majority of points (61%) in the treatment area have only “trace densities” of EWM. The remainder of points in the treatment area have sparse or moderate densities of EWM. There are no points in the treatment area with dense or highly-dense coverage of EWM. Given the relatively low densities of EWM in the treatment areas, it is unclear why the use of an herbicide has been proposed for Brant Lake. The applicant recognizes that hand harvesting of EWM will need to continue indefinitely, and that the hand harvesting has been largely successful.

Moreover, the Brant Lake Management Plan (p. 76) states that “hand harvesting appears to be the most (if not only) appropriate technique for controlling EWM populations at a desirable level for Brant Lake.” Notably, the Brant Lake Management Plan (p. 77) acknowledges that “it is unlikely that the [EWM] population will ever be eradicated”, and that “stakeholders must determine to what level of abundance they wish to suppress EWM”. The Brant Lake stakeholders have not made a documented determination about a realistic goal, or desirable level, of EWM suppression. Therefore, it is premature to approve the use of ProcellaCor when hand harvesting is effective, and stakeholders have not yet established a measurable goal for the level of EWM populations against which the effectiveness of ProcellaCor can be evaluated.

Additionally, there is no information in the application materials about the status and effectiveness of other strategies for controlling EWM identified in the Brant Lake Management Plan (page 71). These strategies “include but are not limited to: proper monitoring and maintenance of septic systems, construction of rain gardens to trap storm water entering the lake, and planting vegetation both in the water and on the shoreline to reduce erosion”, and reduction of the use of lawn fertilizers. These strategies should be implemented to the full extent possible before herbicide use is approved.

Minerva Lake Experience: The Adirondack Park Agency (APA) previously permitted the use of ProcellaCOR in Minerva Lake, in southern Essex County. In Minerva Lake only part of the lake was proposed for treatment but the chemical spread to the whole lake as the sequestration of the treatment area failed. According to a 2023 vegetation survey, since the ProcellaCOR treatment of Minerva Lake in 2020, there has been an overall decrease in the frequency of occurrence for the most common native plant species, and that several species (floating pondweed (*P. natans*), bur-reed (*Sparganium spp.*), slender naiad (*Najas gracillima*), and quillwort (*Isoetes spp.*) that used to be present are no longer observed at all. Is it possible that the declines, and complete lack, of some plant species is a result of the ProcellaCOR treatment?

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

species raises the question of the efficacy and cost effectiveness of the use of ProcellaCOR EC in the future.”

Lake Luzerne Experience: We understand that ProcellaCOR was approved for use in Lake Luzerne and that the application of ProcellaCOR was undertaken in the summer of 2023. Information about the efficacy of the application, as well as post-treatment findings of impacts to non-target aquatic plants, fish and other aquatic species, from the treatment of that lake should be provided to APA for review prior to approval for use in additional lakes in the Adirondacks.

Questions that merit greater examination: The proposed use of ProcellaCOR to treat EWM on 164 acres of Brant Lake raises many questions. These include:

- The aquatic plant diversity of the lake is relatively high. Impacts to non-target plants have been reported in recent treatments in other lakes and ponds. The proposal for use of ProcellaCOR has provided information about the impacts on non-target aquatic plants such as native milfoil, but also acknowledges that there are some plant species where the impacts are unknown, such as for Common pipewort, which is relatively common in Brant Lake. We appreciate that there is a post-treatment monitoring plan that includes qualitative and quantitative plant surveys following the use of ProcellaCOR. APA should require that these survey results be submitted to APA, and that no future applications for use of herbicides in Brant Lake be approved if these surveys are not provided to APA.
- The proposal for use of ProcellaCOR has not provided any pre-and post-treatment findings for macrophytes, algae, fish, benthic invertebrates or zooplankton native to Adirondack lakes. Much more information is needed to assess these impacts.
- The application materials originally considered the entire lake the dilution zone, but the “more refined” simulated dilution zones mapped for the treatment areas cover 977 acres, more than half of the total size of the lake (1,440 acres). Thus, the proposal is not limited to a small area of impact for the lake. The APA should require a pretreatment dye study of the proposed treatment areas to determine the actual extent of the dilution/dispersal zones.
- Brant Lake is a complicated lake with a major outflow over the dam and 14 tributaries into the lake. The lake’s water is dynamic, not static. According to the ProcellaCor production information it is an herbicide “for management of freshwater aquatic vegetation in slow-moving/quiescent waters with little or no continuous flow”. Brant Lake does not match the characteristics called for by the production information so should ProcellaCor even be considered for use in this lake?
- While not entirely clear from the application materials, it appears that chemical treatments are envisioned in the future, two or three years from the initial

application, as a means for controlling EWM in Brant Lake on an ongoing basis. We oppose regular/repeated use of ProcellaCOR as a long-term management technique.

Questions merit full examination in an official APA Adjudicatory Public Hearing: The APA ordered and conducted a formal adjudicatory hearing on the proposed use of the aquatic herbicide SONAR by the Lake George Park Commission two decades ago, and the APA Board voted down the project in January 2003 based upon information elicited during that hearing. ProcellaCOR is less proven than Sonar was at time. Though the APA has refused to consider any formal adjudicatory hearings for the last 13 years, this project merits a high level of public scrutiny, opportunity for independent expert testimony and cross-examination, and public involvement. The APA's refusal to hold formal adjudicatory public hearings on major projects over the last dozen+ years has been an unfortunate miscarriage of its regulatory responsibility and shows a disturbing hubris in its regulatory review.

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

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

Sincerely,

A handwritten signature in cursive script that reads "Claudia K. Braymer".

Claudia Braymer,
Deputy Director



Town of Lake Luzerne, New York

P.O. Box 370, 539 Lake Avenue 12846

Gene Merlino
Supervisor

E-mail: supervisorlakeluzerne@hotmail.com

Cynthia Sherwood
Town Clerk

E-mail: lakeluzerne@albany.twcbc.com

Website: townoflakeluzerne.com

Town Council

Timothy Hanlon

Annie McMahon

Dane Morton

James Niles

Phone - 518-696-2711

Fax - 518-696-2773



Adirondack Park Agency
Attn: Mr. Aaron Ziemann

Re; APA Project No. 2023-0037

February 13, 2024

Dear Mr. Ziemann,

I am writing to express our Town Council's support for the above referenced APA project number 2023-0037, Brant Lake Foundation application, to use the herbicide ProcellaCOR in Brant Lake. Based upon our experience using ProcellaCOR in Lake Luzerne in May of 2023, we support Brant Lake's application. In Lake Luzerne ProcellaCOR performed exactly as predicted, has produced no unpredicted side effects, and has killed Eurasian watermilfoil to the extent that we have not found any in our 2 surveys since treatment.

Thank you.

Sincerely,

James E. Niles
Deputy Supervisor/Councilman
Town of Lake Luzerne

APA Propet No 2023-0037

906 Palisades Road
Brant Lake, N.Y.
12815

Dear Mr Zemann,

Aqualogio has stated in their March 25, 2022 letter "Hand harvesting has been effective in low/median density areas." History has demonstrated that herbicides can be very dangerous even lethal such as D.D.T. and Roundup. Both herbicides at the time they were approved did not allow time to be certain these herbicides would cause illness and in many cases death to humans.

At this time, not enough time or research can give Procella Cor a clean bill of health. Even in the Brant Lake newsletter the "BrantLaker" Spring 2022 Tom Wynne states "If applied at extremely low levels its reported to be very safe to the aquatic environment and humans." In the 1930 D.D.T. was reported

to be "very safe too" and again recently "Roundup" ²
was reported to be "very safe." Look at the
millions of dollars being paid to those
people who thought "Roundup" was very "safe."
Once again the so called experts were
wrong.

Last year, the application to use posillor
was retracted so informational meetings
would take place during the summer of
2023. These meetings took place but were
only advised to the Benton Lake Association
members not to the general public. For
example I found out about the July
meeting twenty minutes before the
meeting from a friend. At that meeting
I stated there was no communication
announcing the meeting to the general public
tax payers. I was told by the president of
the association they were sorry and would do
a better job for the August meeting.

3

He stated that they would advertise now using the bulletin board outside the Brant Lake fire house. They didn't. At the August meeting, the President of the Brant Lake Association still wasn't sure of the safety of this herbicide and its after effects. Minnawa Lake people have reported some ill effects on some plant life in their lake and other lakes - population are still not sure about this herbicide. What about the effect on the ground water - peoples wells and the Johnson river since Brant Lake feeds that river?

Since hand harvesting is working and safe (not expensive) there is no good safe reason to treat Brant Lake with the

"Aroniaack Park Agency" can be certain without a doubt the families fishing are swimming

Mr Bont Lake will be paper this been
 since the mid 1980's melfoil was first
 discovered why now such a rush to
 put people's health at risk and property
 value in a bad light using this poison.

If they increase the hand harvesting
 and have a real effective Campaign to
 inform the public not just people who live
 on Brent Gate and wait until then is not
 doubt about this herbicide we then can
 insure the water quality of our Lake. I feel
 it is a slap in the face not informing our
 local population to not to inform them.

We are requesting that you place on
 hold any herbicide treatment until there is no
doubt about the safety of this herbicide. This way
 you will be protecting the people's health and
safety and will be avoiding many lawsuits

Thank you for your cooperation in this matter
 Sincerely,
 Richard Taylor

7824 State Route 8
Brant Lake, N.Y.
December 8, 2023

RECEIVED
ADIRONDACK PARK AGENCY

DEC 11 2023

Mr. Aaron Ziemann
NYS Adirondack Park Agency
P.O. Box 99
1133 NYS Rt. 86
Ray Brook, N.Y. 12977

Dear Mr. Ziermann,

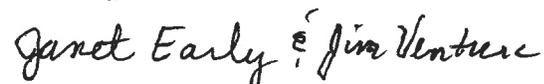
We are writing to state that I fully support the application of ProcellaCor for the treatment of 5 heavily infested areas (with Eurasian Water Milfoil) of Brant Lake. The Brant Lake Association and the Town of Horicon have been monitoring and actively battling this invasive species for many years and is absolutely losing the battle. More than a million dollars has been spent over many years to pay for professional divers to remove the offensive plants. Plus, hundreds of hours of volunteer divers and support staff have been invested to supplement the efforts of the profession crews. And, we fear, that without a break-thru, our lake is doomed. Having the lake classified as "impaired" by the DEC was a wake-up call that more advanced methods were needed to deal with this problem in our small and shallow lake.

ProcellaCor has proven to be both a safe and effective treatment for Eurasian Water Milfoil. We have followed the successful treatment in other area lakes and have read the scientific reports on the safety of this treatment to humans, animals and other plant life. We have no concerns about the application in Brant Lake, and support its applications at the soonest possible date in the spring of 2024.

We have owned a home on Brant Lake since 1986, being drawn to Brant Lake because of the health and beauty of this lake. In 2021, we moved to Brant Lake as a permanent resident and care deeply for the town, and the lake. We would like to see Brant Lake restored to its former health as quickly as possible, and believe the application of ProcellaCor is a major step in that direction.

We encourage the Adirondack Park Agency to approve the Brant Lake Association's application for ProcellaCor treatment of Brant Lake.

Sincerely,


Janet Early and Jim Ventura

cc: Brant Lake Association