From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: SVFJOLLY@MSN.COM
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 22, 2024 2:09:18 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Susan Valle, svfjolly@msn.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Susan Valle
Email from: svfjolly@msn.com
Address: Village Circle South Round Lake NY 12151
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I support applicatoin of the acquatice herbicide that has been adequately tested and proven safe. Please stop the delay and get this project back on track to protect our treasure, Lake George.
Thank you.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: robine@optonline.net
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 9:28:27 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Sinkway Family LLC, robine@optonline.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Sinkway Family LLC
Email from: robine@optonline.net
Address: 11 Silver Bay Silver Bay NY NY 12874
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Adirondack Park Agency project ID 2023-007 May 15 2024
Aaron Ziemann
RPcomments@apa.ny.gov
Dear Sir,
I am absolutely opposed to the use of the chemical herbicide ProcellaCOR in Lake George.
There is no need for me to copy and paste from websites that state all the facts as to why this herbicide should NOT BE ALLOWED TO be used in Lake George without more tangible evidence of its environmental impact. You can find those facts on the Lake George Association and the Lake George Water Keepers websites.
My family and I own 2 homes on Lake George and we have lived there for 2 generations. We DRINK THE WATER and depend on this lake to survive for generations to come. Our homes are directly across the lake from Sheep Meadow Bay and could potentially cause irreparable environmental harm by using a herbicide that HAS NOT BEEN SUFFICIENTLY TESTED IN ORDER TO ASCERTAIN THE IRREVERSIBLE IMPACT IT COULD HAVE ON THIS LAKE.
The Lake George Park Commission used to work WITH the two other groups stated above to protect this lake but apparently they have lost all reason and will possibly create devastating harm to a living lake if the use of this herbicide is allowed to move forward.
It is questionable as to why the LGPC have forced new septic system regulations on homeowners costing us $60,000 -$100,000 and instituted other inspections meant to protect the lake yet allow THIS project to continue without more research on the books. Being forced to spend this amount of money to protect our lake and protect the value of our homes and then threaten the very lake we are trying to protect is the definition of insanity.
If the Lake George Park Commission had spent more time and money keeping boats off the lake that bring in the invasives we wouldn't be here today. The traditional methods of battling milfoil have been working.
Why would anyone with any knowledge of the dangers put a pesticide in a pristine lake!
My friends, family and neighbors work every day to protect our lake and the science and testing has NOT PROVED THAT THIS IS A SAFE COURSE OF ACTION.
Please support and protect our Queen of American lakes, one of only two left in America. STOP THIS PLAN TO PUT PROCELLAcor IN LAKE GEORGE.
Respectfully,

Robin Emery - member/owner with my siblings Sinkway Family LLC
24 Ferndale Ave. Glen Rock NJ
11 Silver Bay Rd Silver Bay NY 12874

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: bmmsimpson@mac.com
Subject: APA Project 2023-0018 Public Comments
Date: Friday, May 17, 2024 10:28:51 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Bridget M.M. Simpson, bmmsimpson@mac.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Bridget M.M. Simpson
Email from: bmmsimpson@mac.com
Address: 13 Holcomb Ave. Ticonderoga NY 12883
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I swim in Lake George year round, and have logged literally hundreds of miles since purchasing my home in Ticonderoga in June, 20214. I participate in the Hague Swim Series annually as a swimmer or support crew. I swam the length of Lake George in 2017, and was the oldest swimmer at that time to do so. I have also come within 50 yards of an Ice Mile in Lake George- in 39.9F water, in 2019. I believe my cold swim is a Lake George record. I swam today, May 17, and saw my first fish of the year along Black Point Road. I look forward to seeing the turtles. I have also swum along the shore and realized I was swimming parallel to a family of ducks. Beautiful!! I spend hours looking into the lake, and I do not mind swimming with pollen fluff on the water, summer bugs at the surface on summer nights, or through leaves in the fall. You should see the leaves glow in the autumn sunbeams under water, slowly sinking to the bottom. I do NOT wish to swim with pesticides. I am careful to wash my swim gear if I swim in other waters, so I do not carry anything invasive into the lake. I have swum in the Hudson, the Chesapeake, the Potomac, the Atlantic,the Caribbean, and many other bodies of water. Lake George is special. Keep it safe.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: rep.jasavage.2023@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 28, 2024 5:05:37 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Amy Savage, rep.jasavage.2023@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Amy Savage
Email from: rep.jasavage.2023@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I would like to state that I am in favor of this project.
The LGPC has done the research and is looking out for the best interests of lake george. Something sustainable must be done to maintain the health of the lake without spending millions each year with no enduring results.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: jared.butlin@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 8:00:20 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Jared Butlin, jared.butlin@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jared Butlin
Email from: jared.butlin@gmail.com
Address: 55 pleasantview Ave Massachusetts 01106
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I strongly object to the use of procelacor

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Clarec1221@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 9:07:34 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Clare Caldwell, Clarec1221@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Clare Caldwell
Email from: Clarec1221@gmail.com
Address: 146 Butterworth Rd Orange MA 01364
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am extremely concerned about using herbicides to treat invasive aquatic plants in Lake George. It seems that we are told the chemicals that are used commonly in our environments, esp our food systems, are safe right up until they become banned for causing cancer. We are exposed to too many toxic chemicals. It feels too risky to apply ProcellaCor to Lake George with no real benefits to people who enjoy the lake, the water quality, or wildlife. I do not support single applications or long term use of herbicide applications to the water. My family has been coming to Lake George for over 6 generations and I have wonderful memories with grandparents, aunts, uncles, and many cousins coming together in Bolton Landing in the summer. I will be heartbroken if the water isn't safe for children in the next generation to swim in. There must be a cleaner, less controversial effort to maintain the water quality and ecosystem of Lake George.
Thank you for taking time to read this.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Jensexton21@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Sunday, May 19, 2024 1:22:39 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Jennifer Foxson, Jensexton21@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jennifer Foxson
Email from: Jensexton21@gmail.com
Address: 39 Dale Dr Summit NJ 07901-3104
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Please do not put ProcellaCOR in Lake George. I am a Hague seasonal resident and lakefront property owner and my family and I use the lake recreationally. I am concerned that this pesticide contains forever chemicals that will be dangerous to me, my family and my pets because we swim in the lake. We also enjoy watching the heron that frequents the Hague Brook and the many loons now calling Lake George home. We have even seen several bald eagles flying over head recently. This chemical will undoubtedly harm the area wildlife and it also has the great likelihood of diminishing my property value. Furthermore, we do not have an issue with the milfoil this chemical is intended to treat. Please do not put this poison in Lake George.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: bklebe663@comcast.net
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 8:07:17 AM

********** 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 "2023-0018, William Klebe, bklebe663@comcast.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: William Klebe
Email from: bklebe663@comcast.net
Address: 2 Sunrise Park Silver Bay NY 12874
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

We are opposed to using the chemical Procellacor in Lake George, My family has owned property at Silver Bay for over 100 years. Our sole source of drinking water cones from Lake George and we do not want any chemical to affect that source. We also use the lake for swimming and recreational purposes. We feel there must be some other way to control the milfoil in the lake other than using chemicals. Lake George has been considered for years as one of the cleanest and clearest lakes in the United States and we feel it should be kept in that pristine condition without any unwarranted chemicals being placed in the lake. Please reconsider your decision.

Bill & Judy Klebe

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: jkeninitz@verizon.net
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 29, 2024 2:00:22 AM

********** 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 "2023-0018, Jennifer Keninitz, jkeninitz@verizon.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jennifer Keninitz
Email from: jkeninitz@verizon.net
Address: 17808 Cricket Hill Dr Germantown MD 20874
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

As a muligenerational George property owner I would like to register my opposition to the use of ProcellaCOR EC to control milfoil. We use the lake as our drinking water and do not want any chemicals put into the crystal clear water of our beautiful lake. I am very concerned about the health implications as well. Please do not vote to allow this. We hope to see the lake remain a source of safe drinking water for generations to come.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: hussas2000@yahoo.com
Subject: APA Project 2023-0018 Public Comments
Date: Friday, May 17, 2024 1:26:54 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Sarah Hussa, hussas2000@yahoo.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Sarah Hussa
Email from: hussas2000@yahoo.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am in favor of protecting Lake George with Pro Ella's or

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Charliecrew1@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 4:24:01 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Charlie Crew, Charliecrew1@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Charlie Crew
Email from: Charliecrew1@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

There needs to be more testing of this chemical. I have spent over 45 years in the Chemical industry and I am against putting this chemical in the Lake at this time.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Brittanyhollow@aol.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 7:47:57 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Sheila Voss , Brittanyhollow@aol.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Sheila Voss
Email from: Brittanyhollow@aol.com
Address: 9665 Lakeshore Dr Hague NY 12836
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Please stop this from entering our beautiful lake!

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Vcurren@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 29, 2024 8:00:29 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Valerie Curren, Vcurren@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Valerie Curren
Email from: Vcurren@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I fully support the use of procellacor in Lake George. It is well studied to treat the invasive Aquatic plant species that are ruining our lake without harm to the water quality. I appreciate the DEC's efforts to treat Lake George with this evidence based approach that has been used successfully in local bodies of water and more broadly throughout New England.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: ccurren51@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 16, 2024 1:05:58 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Carolyn Curren, ccurren51@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Carolyn Curren
Email from: ccurren51@gmail.com
Address: 18 Heritage Pt Queensbury NY 12804
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

As a land owner on Lake George, I submitted comments in favor of ProcellaCor and a letter addressed to Aaron Ziemann and the Adirondack Park Agency Board members dated February 21, 2024. I want to be sure that my letter is still valid to be on record in support of ProcellaCor in any bays on Lake George. I would also support its use in Sandy Bay where my small camp is located.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: howarthmv@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 29, 2024 7:11:56 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Marilyn Howarth, MD, howarthmv@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Marilyn Howarth, MD
Email from: howarthmv@gmail.com
Address: 495 County Route 1 Putnam Station NY 12861
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

May 28, 2024

Aaron Ziemann
Adirondack Park Agency

Re: APA Project No. 2023-0018 Riparian Owner/User Objection to Proposed Aquatic Herbicide Treatment (ProcellaCOR) in Blairs Bay and Sheep Meadow Bay, Lake George

Dear Mr. Ziemann,
I am writing to you on behalf of myself and my family as an adjacent riparian owner/user to formally object to the proposed treatment using the herbicide ProcellaCOR in our pristine bay. Our property is located at 495 County Route 1, Putnam Station, NY 12861 with 200 feet of lake front on Blair's Bay, the closest property to the area of proposed application.

Our family obtains all of our drinking water from Blair's Bay and the intake is located within the area of proposed application. All of the water that we use for bathing, irrigation of our property and our granddaughters' kiddie pool come directly from the Lake. Our dogs frolic in the lake many times each day. My daughter in law plans to continue to breastfeed through this coming summer. We have been aware of the Eurasian watermilfoil in our bay for some time and noted that the 'blanketing' strategy to block sunlight has kept it to a minimum. At no time has the watermilfoil impacted our ability to swim, sail, or use our motorboat.

As an Occupational and Environmental Medicine Physician with an expertise in medical toxicology I am very concerned about the cavalier and negligent approach to the use of the herbicide ProcellaCOR in this setting. Clearly, the EPA was not thinking about herbicide residuals in drinking and bathing water when they elected to not conduct a quantitative risk assessment for florpyrauxifen-benzyl, but instead conducted a qualitative risk assessment in support of its use (EPA, 2017). In the US, we have allowed the use of chemicals with the most minimal of safety testing and relied on the public or the academic community rather than the manufacturer to develop the toxicology data. ProcellaCOR is a prime example. Very little toxicology study has been done on this chemical. When we look at the

Risk Assessment done by the European Union Food Safety Authority, the data gaps become clear (EFSA, 2018). Their task was to assess the risk to human health of florpyrauxifen-benzyl as a residual on rice. Through this process they identified that this chemical and its key environmental breakdown products (florpyrauxifen) were skin sensitizers. Being exposed to a skin sensitizer in the context of bathing in it added to sunlight exposure can cause skin irritation in some people. In addition, there was evidence that this herbicide acts as an endocrine disruptor in mammals. Mammary gland tumors were observed in male rats. The argument that this outcome only occurred at higher levels is flawed because endocrine disruptors are known to have different impacts in mammalian systems at low and high levels. The fact that ProcellaCOR has endocrine disrupting properties at any dose warrants further study before allowing it to be added to drinking water. In fact, Minnesota has determined that florpyrauxifen-benzyl is a PFAS pesticide as are its key breakdown products. PFAS are persistent chemicals in the environment with multiple health impacts which are not yet fully elucidated. The US EPA just set a maximum contaminant goal for drinking water of zero for PFOA and PFOS. The EPA also affirmed that there is no level of exposure to these contaminants without risk of human impact. Applying a chemical to our drinking water with potential health effects similar to PFAS is irresponsible.

The half life of ProcellaCOR that is reported as less than 10 days is extraordinarily misleading. The chemical breaks down in water primarily to an equally active chemical fluorpyrauxifin. The ½ life of this chemical is dependent on water temperature, ph, solute concentration and other factors (Zhou, 2023) The breakdown products of X11966341 and X12483137 show medium to very high persistence (up to 610 days) in soil. There is no toxicologic data in mammals for these breakdown products. Our 200 feet of lake front is contained within the dilution zone.

In short, this application would expose my family to this endocrine disrupting chemical and its untested breakdown products for nearly 2 years to possibly eliminate a plant that is currently being managed effectively through non chemical means.

The sampling plan is wholly inadequate. The proposed sampling site BB1 is within the treatment area and BB2 is at the mouth of Sucker brook which would tend to dilute chemical, providing not a representative sample of the concentration near homes, but rather an artificially low concentration due to dilution. All of the remaining sample sites are remote out in the lake. There is no sampling location that is representative of the exposure to my family and our neighbors who also have drinking water lines in the treatment area. In addition, the sampling plan only calls for sampling the parent compound and not any of the equally suspect breakdown products.

I urge you to prohibit this application.

As riparian lake owners/users, we have substantial personal, heritage, and financial investment in Lake George. There is a real risk that our near- and long-term use of the Lake could be significantly and adversely affected by the State's action. Examples of substantial adverse effects include:

- As warned by the ProcellaCOR label, weed biotypes that are resistant to this herbicide are likely to develop, thus necessitating a long-term addition to chemical treatments;
- The ProcellaCOR registration and subsequent published literature identifies impacts on native plants that could upset the delicate food web and ecology of the Lake, including potential adverse impact on fisheries and existing wetland classifications and levels of protection;
- The potential for accidents including land drift when attempting to apply this chemical in the Lake would impact my property directly and substantially;
- As warned by the ProcellaCOR label, there are expected restrictions and impacts on irrigation of gardens and livestock; and shockingly NO posted restrictions on drinking water. The lack of restriction is simply because the safety data has not been collected. Humans are left unprotected.
- Irrevocable reputational damage to the pristine character of Lake George, including potentially damaging impacts to property rental and sales values, particularly in or adjacent to the treatment areas.

I have read the position paper from the Lake George Association and the Lake George Waterkeeper and support the issues identified therein. I believe that there is no need to use chemical treatments in Lake George, that effective non-chemical treatment methods exist, and that we should not experiment in Lake George.

At the most basic level, I believe the State has failed to demonstrate that the benefits of the use of ProcellaCOR outweigh the known and unknown short- and long-term human health risks associated with the introduction of an

endocrine disrupting herbicide in Lake George. I believe this pesticide was registered and intended for use in grossly infested waterbodies where basic uses (e.g. transportation, hydropower, boating, swimming) are fundamentally impaired or prevented due to gross infestations of invasive plants, not where the water is used on a daily basis for drinking and bathing, as in Lake George.

In addition, there are better and successful alternatives to the proposed chemical treatment, including diver-assisted suction harvesting and blanketing to eliminate light.

In accordance with New York State Department of Environmental Conservation Policy DSHM-PES-05-05 Aquatic Pesticide Permit Program, we understand that, as riparian owners/users, our consent must be obtained, or the applicant must be able to certify that we will not be adversely impacted by the proposed treatment. We do not believe that the applicant has demonstrated the lack of adverse impact, and we most certainly do not consent. In fact, should this application go forward, my recommendation to my family and all of the families drinking Lake George water in the vicinity of the application is to stop drinking and using the water to bathe for at least 6 months after the application. This would pose an undue hardship in our ability to use our properties fully in addition to a financial burden to import clean water.

Based on the issues identified in this letter and the position paper from the LGA/Waterkeeper, we respectfully request that the permit applications be denied.
Respectfully,

Marilyn V. Howarth, MD, FACOEM

References

1. European Food Safety Authority (EFSA); Arena M, Auteri D, Barmaz S, Brancato A, Brocca D, Bura L, Carrasco Cabrera L, Chaideftou E, Chiusolo A, Civitella C, Court Marques D, Crivellente F, Ctverackova L, De Lentdecker C, Egsmose M, Erdos Z, Fait G, Ferreira L, Goumenou M, Greco L, Ippolito A, Istace F, Jarrah S, Kardassi D, Leuschner R, Lostia A, Lythgo C, Magrans JO, Medina P, Mineo D, Miron I, Molnar T, Padovani L, Parra Morte JM, Pedersen R, Reich H, Sacchi A, Santos M, Serafimova R, Sharp R, Stanek A, Streissl F, Sturma J, Szentes C, Tarazona J, Terron A, Theobald A, Vagenende B, Van Dijk J, Villamar-Bouza L. Peer review of the pesticide risk assessment of the active substance florpyrauxifen (variant assessed florpyrauxifen-benzyl). EFSA J. 2018 Aug 6;16(8):e05378. doi: 10.2903/j.efsa.2018.5378. PMID: 32626021; PMCID: PMC7009457.
2. US EPA; Florpyrauxifen-benzyl: Environmental Fate and Ecological Risk Assessment for the Section 3 New Chemical Registration. April 11, 2017 EPA-HQ-OPP-2016-0560-0011.
3. Zhou R, Dong Z, Wang L, Zhou W, Zhao W, Wu T, Chang H, Lin W, Li B. Degradation of a New Herbicide Florpyrauxifen-Benzyl in Water: Kinetics, Various Influencing Factors and Its Reaction Mechanisms. Int J Mol Sci. 2023 Jun 23;24(13):10521. doi: 10.3390/ijms241310521. PMID: 37445703; PMCID: PMC10342155.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: john@wflake.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 3:42:32 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, John L. Hodgkins III, john@wflake.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: John L. Hodgkins III
Email from: john@wflake.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I support the use of the Aquatic Herbicide Procella Cor. Hand harvesting has proved not to be effective, spreads weeds, makes water unusable for swimming or drinking. Observing the number of new beds that have recently taken hold in Harris Bay, hand harvesting does not work and could be a major reason Milfoil is spreading. Forty years ago, when there were only a few beds of Milfoil we had the opportunity to kill it off using a similar product SONAR. Like Procella COR the science supported the use of the SONAR. If we had followed the science 40 years ago, Milfoil might not be an issue today.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: saracess7@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 16, 2024 9:55:46 AM

********** 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 "2023-0018, SARA A DOYLE, saracess7@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: SARA A DOYLE
Email from: saracess7@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

We do not want pesticides contaminating our beautiful lake. Please reconsider your approval of this project for the safety of our children, animals and loved ones.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: geohawkins3744@yahoo.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 2:37:02 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, George Hawkins, geohawkins3744@yahoo.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: George Hawkins
Email from: geohawkins3744@yahoo.com
Address: TX 77056
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

While I applaud the attention and the effort to eradicate milfoil, I am anxious about introducing this chemical compound into the otherwise pure waters of Lake George. I ask that other, benign treatments be explored, and that the heroic efforts of the commission be examined as to solutions to this problem.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: cheryl.lyn.dybas@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 8:00:18 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Cheryl Lyn Dybas, cheryl.lyn.dybas@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Cheryl Lyn Dybas
Email from: cheryl.lyn.dybas@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

The lake is our drinking water and we do not want this chemical in it. In addition to humans, this chemical affects wildlife. It needs to stay out of the lake.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: RSFKarn@aol.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 9:22:24 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Karen Edwards, RSFKarn@aol.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Karen Edwards
Email from: RSFKarn@aol.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

We drink water right out of the lake. Please, please, please don't poison us or the lake. The long term effects are unknown and most rash decisions regarding solutions are more dangerous than the original problems.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: robine@optonline.net
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 9:42:27 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, SB Lakehouse LLC, robine@optonline.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: SB Lakehouse LLC
Email from: robine@optonline.net
Address: 12 Silver Bay Rd Silver Bay NY 12874
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Adirondack Park Agency project ID 2023-018 May 15 2024
Aaron Ziemann
RPcomments@apa.ny.gov
Dear Sir,
I am absolutely opposed to the use of the chemical herbicide ProcellaCOR in Lake George.
There is no need for me to copy and paste from websites that state all the facts as to why this herbicide should NOT BE ALLOWED TO be used in Lake George without more tangible evidence of its environmental impact. You can find those facts on the Lake George Association and the Lake George Water Keepers websites.
My family and I own 2 homes on Lake George and we have lived there for 2 generations. We DRINK THE WATER and depend on this lake to survive for generations to come. Our homes are southwest and directly within the winds that push the lake water north to south from Blairs Bay and could potentially cause irreparable environmental harm by using a herbicide that HAS NOT BEEN SUFFICIENTLY TESTED IN ORDER TO ASCERTAIN THE IRREVERSIBLE IMPACT IT COULD HAVE ON THIS LAKE.
The Lake George Park Commission used to work WITH the two other groups stated above to protect this lake but apparently they have lost all reason and will possibly create devastating harm to a living lake if the use of this herbicide is allowed to move forward.
It is questionable as to why the LGPC have forced new septic system regulations on homeowners costing us $60,000 -$100,000 and instituted other inspections meant to protect the lake yet allow THIS project to continue without more research on the books. Being forced to spend this amount of money to protect our lake and protect the value of our homes and then threaten the very lake we are trying to protect is the definition of insanity.
If the Lake George Park Commission had spent more time and money keeping boats off the lake that bring in the invasives we wouldn't be here today. The traditional methods of battling milfoil have been working.
Why would anyone with any knowledge of the dangers put a pesticide in a pristine lake!
My friends, family and neighbors work every day to protect our lake and the science and testing has NOT PROVED THAT THIS IS A SAFE COURSE OF ACTION.
Please support and protect our Queen of American lakes, one of only two left in America. STOP THIS PLAN TO PUT PROCELLAcor IN LAKE GEORGE.
Respectfully,

Robin Emery - member/owner with my siblings SB Lakehouse LLC
24 Ferndale Ave. Glen Rock NJ
12 Silver Bay Rd Silver Bay NY 12874

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: tanneragS15@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 23, 2024 11:07:49 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Vincent Fantozzi, tanneragS15@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Vincent Fantozzi
Email from: tanneragS15@gmail.com
Address: NY
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I strongly support applying the herbicide to prevent further spread of the milfoil that is endangering Lake George, a state treasure. ProcellaCOR EC has been sufficiently tested and proven safe. Please do not delay.
Thank you.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: mzgbrkvwl@aol.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 28, 2024 10:15:12 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Mary Z Gridley, mzgbrkvwl@aol.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Mary Z Gridley
Email from: mzgbrkvwl@aol.com
Address: 708 St Marks Lane Schenectady NY 12309
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

My family has enjoyed spending summers at 54 Bay Parkway, Assembly Point, Lake George since 1942 when grandfather built two cottages on the East Shore. My grand daughter will be the 5th generation to happily enjoy the beauty of this lake surrounded by caring residents all maintaining the highest stewardship of our land and water. I plead with meaningful intent for you to stop the experimental use of a potentially toxic herbicide Procella COR EC planned to be used within two bays.
Hearings have not exposed the cancer causing pesticide that will endanger our lives. We swim, fish, and drink this water. Please do the right research and listen to us who care only about the well-being and future of our families.

Thank you for your consideration and concern.
Sincerely,
Mary Z. Gridley

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: adelef1010@live.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 2:00:33 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Adele Ferranti, adelef1010@live.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Adele Ferranti
Email from: adelef1010@live.com
Address: 7 Queens Lane Queensbury NY 12804
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I support the application of the herbicide ProcellaCor EC to control milfoil in the Bay.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Howardsambrook@yahoo.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 8:48:57 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Howardsambrook , Howardsambrook@yahoo.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Howardsambrook
Email from: Howardsambrook@yahoo.com
Address: 2296 Black point rd Ticonderoga Ny 12883
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I think you should be more concerned with failing septic systems that are known detrimental to the lake we on black point rd. have done the right thing for the betterment of the lake with our sewer district we/ I as well as my grandchildren drink the lake water said septic are failing they should be on a holding tank till there is proper measure's taken and inspected until doing so. I have been boating LG for over 50yrs and there is no way some of the lakefront cottages can possible meet code there is just not enough square footage for a approved leach field.
Howard Sambrook

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: rogersaks@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 1:16:29 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Roger Saks, rogersaks@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Roger Saks
Email from: rogersaks@gmail.com
Address: 39 Waltonian Rd Unit 620 Hague NY 12836
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am writing to voice my strong opposition to the plan of applying ProcellaCOR in Lake George. This proposal concerns me deeply, as it poses significant risks to the lake, its wildlife, and those of us who cherish spending time there.

Lake George has been a special part of my life for many years. I swim in the lake regularly, enjoying its clear waters and the natural beauty that surrounds it. The idea of introducing ProcellaCOR, a pesticide classified as moderately toxic, is alarming for several reasons:

Health Concerns: Even though I don't use the lake for drinking water, I do swim in it frequently. The thought of ingesting water contaminated with ProcellaCOR while swimming is unsettling. This could pose health risks, especially for children, pets, and people with health conditions.

Wildlife Impact: Lake George is home to so much wildlife, from turtles to ducks and otters. Introducing a toxic pesticide could disrupt their habitats and food sources, leading to harmful ecological consequences.

Economic and Reputational Damage: Lake George is a beloved tourist destination, and the use of pesticides could deter visitors. This would result in a loss of tourism income for the region. Additionally, the reputational damage associated with pesticide use could lower property values around the lake.

Safety Concerns: Seriously? A pesticide in water that’s constantly moving? Why is this even a conversation?

The potential risks to our beloved lake far outweigh any perceived benefits. I trust the APA will prioritize the health and safety of Lake George and its community.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: C3rowe@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Friday, May 17, 2024 11:53:46 AM

********** 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 "2023-0018, Courtney Rowe, C3rowe@gmail.com " into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Courtney Rowe
Email from: C3rowe@gmail.com
Address: 119 Dearborn Lane Mooresville NC 28117
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I have spent every summer of my life at our family property in Katskill Bay on Lake George. Our water source has always been a pipe straight from the lake to our home (even when we upgraded our house in 2013). I love swimming, water skiing, wake boarding, paddle boarding, and boating on the lake. The purity of the water is one of the many magical things about Lake George. It is clean, clear, sparkly, and is a healthy ecosystem. Please DO NOT add chemicals to our water! We as individuals, local residents, and visitors depend on Lake George to be clean and chemical-free. PLEASE keep it that way now and forever so we can always enjoy the beauty and purity of Lake George!

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: pdr60@ymail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 4:07:00 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Peter Roland, pdr60@ymail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Peter Roland
Email from: pdr60@ymail.com
Address: 20 Fairway Ct Queensbury NY 12804
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Hi there!
I object to putting any chemicals in the jewel of our Adirondack Park LAKE GEORGE!

As well as town of queensbury (over 10 miles of shoreline)

Bottom line let Mother Nature and we the people keep our lake clean!

A concerned resident of Queensland Warren county.
Pete Roland

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: cranknsweet@comcast.net
Subject: APA Project 2023-0018 Public Comments
Date: Monday, May 27, 2024 7:19:20 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Karen and Chris Robinson, cranknsweet@comcast.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Karen and Chris Robinson
Email from: cranknsweet@comcast.net
Address: 732 Gull Bay Road Putnam Station NY 12861
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Our Family has had a home on Lake George since 1957. Multi generations have loved the Lake, and recently my 8 year old granddaughter asked why they could not live at Lake George all the time.
We treasure the beautiful waters of our Lake.
I am totally opposed to using ProcellaCOR to control milfoil on Lake George. ProcellaCOR has recently been found to contain PFOAs - a forever chemical that is very dangerous to the environment. Our family and guests swim in Lake George, boat on Lake George, appreciate the wildlife, swim and play in the lake. Several of our family members have chronic health issues and cannot afford to ingest contaminated water.
We live across the Lake from Hague..PLEASE DO NOT ALLOW THE LAKE GEORGE PARK COMMISSION TO USE ProcellaCOR TO TREAT MILFOIL!!!!

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: zoehowland66@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 3:49:42 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Barbara Z Smith, zoehowland66@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Barbara Z Smith
Email from: zoehowland66@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I have been raised on Lake George. I boat, swim, and enjoy the lake tremendously. I feel that milfoil must be eradicated in order to save our beautiful lake an am fully in favor of the use of the herbicide PorcellaCOR EC.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: PUSATERI14@AOL.COM
Subject: APA Project 2023-0018 Public Comments
Date: Friday, May 24, 2024 8:48:25 AM

********** 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 "2023-0018, rosemary Healey pusateri, PUSATERI14@AOL.COM" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: rosemary Healey pusateri
Email from: PUSATERI14@AOL.COM
Address: PO Box 274 75 Mason Rd Cleverdale NY 12820
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

My husband and I live on the shoreline of Lake George year-round. We drink the water and swim. Our grandchildren are the 4th generation of our family on Lake George. We are opposed to application of ProcellaCor in our Lake.

Because I swim, I know Lake George has currents and movement all the time.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: wsoliday@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 1:44:31 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Wendy Soliday, wsoliday@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Wendy Soliday
Email from: wsoliday@gmail.com
Address: 8094 Lake Shore Drive Silverbay NY 12874
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am very concerned about using pro ella in Lake George. My family has been drinking lake water for over 200 years and we do not want more chemicals added to our precious lake. Lake George is proudly one of the few unspoiled lakes in the country.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: kapote08@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 3:14:04 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Kaitlyn Pote, kapote08@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Kaitlyn Pote
Email from: kapote08@gmail.com
Address: 9658 Lakeshore Drive Hague New York 12836
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Hello,

We live on Lake George year-round. We have a 14-month-old baby who drinks the lake water, brushes her teeth in it, and now plays in it in her little pool on the dock every day. I wash her favorite food- apples!- in the lake water.
PLEASE do not allow this herbicide in her drinking water. Children are the most affected by environmental toxins- their bones are growing, their brains and organs developing. They are the most likely to develop cancer and other life-threatening conditions when exposed to even the smallest amounts of PFAs and other chemicals contained in this herbicide. Like lead, THERE IS NO SAFE AMOUNT FOR CHILDREN.
PLEASE, PLEASE do not harm our child. Please protect her and the other children who are exposed to this water every day. I beg you to do the right thing, on behalf of all the parents, grandparents, aunts, uncles, and others who love their children.
Kaitlyn

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: portere1939@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 11:49:37 AM

********** 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 "2023-0018, edith porter, portere1939@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: edith porter
Email from: portere1939@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

i agree with the treatment to control eurasian milfoil on lake george . i have enjoyed the lake for many years and hope to enjoy it many years to come

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Phyllisphoenix56@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 5:24:29 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Phyllis Phoenix, Phyllisphoenix56@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Phyllis Phoenix
Email from: Phyllisphoenix56@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I own a house on Rockhurst Road. Our house is on the Sandy Bay side. I was sad to hear that Eurasian Watermilfoil has been found in our bay. Boats by George seems to have quite a bit of milfoil. So many people that own homes and businesses on Lake George have invested so much money. The lake is by far, the most beautiful lake that I have ever seen. It would be a shame if the water quality was compromised by the milfoil and future generations could not enjoy this beautiful lake. Let's treat this milfoil and stop the destruction.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: rstrong@nycap.rr.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 1:20:16 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Robert Strong, rstrong@nycap.rr.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Robert Strong
Email from: rstrong@nycap.rr.com
Address: 7768 Lakeshore Drive Silver Bay NY 12874
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

As this is my drinking water, please reconsider use of chemicals, without more fully vetting their safety, and stop the proposed application of ProcellaCOR EC in a 4 acre area in Blairs Bay.

The Jefferson Project has shown how fast things move throughout the lake and that this would rapidly spread further through the lake, beyond the initial treatment area.

Thank you

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: cmastrough@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 2:00:34 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Christianne M Strough, cmastrough@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Christianne M Strough
Email from: cmastrough@gmail.com
Address: 7 Woodcrest Dr NY 12804
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

ProcellaCor has been studied and scrutinized. The APA is using the utmost caution in the application of ProcellaCor. I own no property on Lake George but have a stake as a taxpayer in Warren County and realize the financial impact a clean lake will have on our tourist driven economy.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: bbperlman1@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 8:00:24 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Barry Perlman, MD, bbperlman1@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Barry Perlman, MD
Email from: bbperlman1@gmail.com
Address: 515 West End Ave. New York NY 10024
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Our 6 year old grandson is the fifth generation to send summers on 3-Brothers Island, Bolton Landing.
We are quite concerned about the potential toxicity of aquatic herbicides may have on Lake George.
While on the island we get our drinking water directly from the Lake.
All of our family enjoys swimming in the Lake as well as eating fish from it.
Thus there are multiple routes by which our family might ingest toxic herbicides.
We object based on health rationales & see no compelling need for their being introduced into the Lake.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: fpengra@earthlink.net
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 6:15:36 AM

********** 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 "2023-0018, Francey Pengra, fpengra@earthlink.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Francey Pengra
Email from: fpengra@earthlink.net
Address: 3315 Ferndale St. Houston TX 77098
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Putting pesticides in our lake will have harmful affects on we, as humans, wildlife, vegetation. We don't have milfoil. Research proves PROCELLA COR is a bad idea for Lake George, which provides drinking water for those of us who spend each summer on the Lake.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Michael.j.ott@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 29, 2024 6:48:37 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Michael Ott, Michael.j.ott@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Michael Ott
Email from: Michael.j.ott@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

My wife grew up on Lake George and has shared that love with me. We were lucky enough to be married on a dock at the lake last June.
As a maritime engineer at DARPA and Navy veteran I have read about the benefits of Procellacor and fully support It's use in Lake George. This is an important tool to preserving the beauty of the lake against invasive species.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: tiesvcs@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 10:09:33 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Farley P Tierney, tiesvcs@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Farley P Tierney
Email from: tiesvcs@gmail.com
Address: PO BOX 47 TICONDEROGA NY 12883
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I live on the shore of Lake George and spent the entire summer with my family boating, swimming, and fishing. I do not want this added to the lake. I firmly object.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Tim@timtigerenterprises.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 16, 2024 8:37:13 AM

********** 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 "2023-0018, Tim Tiger , Tim@timtigerenterprises.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Tim Tiger
Email from: Tim@timtigerenterprises.com
Address: 393 Baldwin Road Ticonderoga 12883
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am deeply upset that the APA would consider putting such a toxic chemical into the beautiful body of water that is Lake George. As a homeowner, I never put chemicals on my lawn in fear it will go into the lake. It took me years to be able to purchase a home on this lane and I don't want a cancer causing chemical ruining this water. I lost a friend to round up poisoning- it's real, it's lethal and it's wrong to do this. The APA should be protecting this lake not destroying it.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: djolcott@aol.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 8:15:25 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Jennifer Olcott, djolcott@aol.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jennifer Olcott
Email from: djolcott@aol.com
Address: 9251 Lakeshore Drive Hague NY 12836
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

We are absolutely opposed to PorcellaCOR being used in Lake George.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: chanzz785@yahoo.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 4:34:12 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Chandra O'Keeffe, chanzz785@yahoo.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Chandra O'Keeffe
Email from: chanzz785@yahoo.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Don’t poison our lake please!

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: alt1207@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 22, 2024 11:22:05 AM

********** 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 "2023-0018, Glenn Valle, alt1207@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Glenn Valle
Email from: alt1207@gmail.com
Address: 193 Federal Hill Rd. f Bolton Landing NY 12814
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Dear Honorable Commission Members:
I implore you to move forward with the plan to begin application of ProcellaCOR EC to the outlined area of Blair's Bay, Lake George. I have full and complete faith in the due diligence performed by the LGPC under Mr. Wick and I believe that the scientific data generated on this herbicide overwhelmingly supports the safe use of this product. We are facing a potential crisis on the Lake due to the invasive spread of Watermilfoil. I believe that the opposition tactics taken by the LGA and others have been reckless and inflammatory and have only exacerbated this serious threat.

I respectfully request that you APPROVE the application by the LGPC as soon as possible. Thank you.
Glenn Valle

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: kvalle@oalaw.com
Subject: APA Project 2023-0018 Public Comments
Date: Monday, May 20, 2024 5:30:58 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Karen Martino Valle, kvalle@oalaw.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Karen Martino Valle
Email from: kvalle@oalaw.com
Address: 3 Hillside Dr Ballston Lake NY 12019
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I fully support LGPC's planned application of the aquatic herbicide; I own a second home in Bolton Landing, and this is an essential and long-overdue step in maintaining the quality of the water in Lake George.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: Monnienewman@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 28, 2024 7:32:15 AM

********** 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 "2023-0018, Monnie Newman, Monnienewman@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Monnie Newman
Email from: Monnienewman@gmail.com
Address: 7 Morehous Dr Ticonderoga NY 12883
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Lake George is drinking water.
Questions remain on the safety of this aquacide treatment in drinking water .
Swimmers like myself sometimes accidentally ingest lake water while swimming.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: jsphhly58@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Saturday, May 25, 2024 12:34:16 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Joseph Healey, jsphhly58@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Joseph Healey
Email from: jsphhly58@gmail.com
Address: 814 PINEWOOD AVE Schenectady NY 12309
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

While I live in Schenectady, I have property in Lake George located on Robin Lane.

I object to the use of ProcellaCOR in any part of Lake George
• I routinely ingest lake water when swimming
• Lake water is ingested by people with pre-existing health conditions, young children, women of child-bearing age, pets;
• The warnings and instructions on the ProcellaCOR label are not being heeded or followed;
• Milfoil has not been an unmanageable problem on Lake George
• There is lack of knowledge around long-term effects of the pesticide and how it will or will not be contained in the bays indicated. Are we 100% sure it will not spread throughout the lake?

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: kamcspirit@yahoo.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 16, 2024 8:00:29 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Kelly McSpirit, kamcspirit@yahoo.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Kelly McSpirit
Email from: kamcspirit@yahoo.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I Approve the use of ProcellaCOR in Lake George

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: mcthiel@verizon.net
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 2:00:28 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Nancy McLaughlin, mcthiel@verizon.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Nancy McLaughlin
Email from: mcthiel@verizon.net
Address: 10013 Coach Road VA 22181
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Hello,
My name is Nancy McLaughlin (formerly Nancy Thiel) and I have a cottage at 15 Seneca Way in Silver Bay.
I STRONGLY object to the use of the pesticide ProcellaCOR in both Sheep Meadow Bay and Blair's Bay.
Particularly Sheep Meadow Bay due to the water currents (north) in Lake George. Lake George water is our only source of water. We use it to DRINK, cook, bath and clean. Not to mention ingesting it while swimming.
Given the fact that we do not know the long-term effects of ProcellaCOR, how can you expect my family and I (or anyone else on Lake George) to continue drinking the water after ProcellaCOR has been used??!!!
Is the Lake George Park Commission and/or the Adirondack Park Agency going to pay to have my water tested after ProcellaCOR is used?? Or, is either agency going to pay me to have some sort of pesticide filter installed in my cottage, or to dig a well? In the meantime, will either agency reimburse me for purchasing a HUGE amount of bottled water to use (for every purpose) in my cottage???
I do not believe the amount of milfoil in the lake warrants putting the health of people in jeopardy!
Regards,
Nancy McLaughlin

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: elizwilli145@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 8:53:26 AM

********** 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 "2023-0018, Elizabeth Williams, elizwilli145@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Elizabeth Williams
Email from: elizwilli145@gmail.com
Address: 2237 NISKAYUNA DRIVE Schenectady NY 12309-4011
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am a long term(20 plus years) resident of Lake George at Gull Bay. I am against the use of Procellacor because we do not understand the possible long-term effects the herbicide might cause

Thank you

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: mary.mccoslin?triplebcleaninginc.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 1:33:56 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Mary Eileen McCoslin, Mary.McCoslin@triplebcleaninginc.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Mary Eileen McCoslin
Email from: Mary.McCoslin@triplebcleaninginc.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

As a homeowner on Lake George, NY I am writing to express my support for the use of Procellacor in the eradication efforts of milfoil in the lake. Procellacor has demonstrated remarkable efficacy in controlling invasive aquatic plants while posing minimal risk to non targeted species and the environment. Its targeted approach ensures that the intended species are affected, leaving native flora and fauna unharmed. By effectively managing milfoil populations, we can mitigate the negative impacts it has on water quality and the overall health of the lake.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: JENLSMITH2012@GMAIL.COM
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 2:40:23 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Jennifer Lynn Smith, JENLSMITH2012@GMAIL.COM" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jennifer Lynn Smith
Email from: JENLSMITH2012@GMAIL.COM
Address: 24 Spring Lane Hague NY 12836
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Please do not use these chemicals in Lake George. My family including 2 children and a dog use the lake in Hague for our sole source of drinking water, showering, cooking etc. We use the lake water for everything. We are very concerned with ingesting these chemicals and the long term effects that are likely unknown that could occur from ingesting the chemicals.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: lyoungblood@lakegeorgeassociation.org
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 4:54:11 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Leigh Youngblood, lyoungblood@lakegeorgeassociation.org" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Leigh Youngblood
Email from: lyoungblood@lakegeorgeassociation.org
Address: 2392 State Route 9N Lake George NY 12845
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

In my capacity as Interim Executive Director of the Lake George Association I urge the Agency to deny this application for the first-time use of an herbicide in majestic Lake George, which has a class AA-Special water quality designation, particularly without conducting a thorough comprehensive aquatic invasives management plan process, including alternatives analyses.

Alternatively, if the Agency votes to allow this, I urge you to make any approval contingent on its use being consistent with the findings of a comprehensive aquatic invasives management plan process that includes input from the widest range of stakeholders.

The Lake George Association Board of Directors voted to cover the cost of hand harvesting in 2024. This offer has been made to the LGPC in writing. This allows time to begin a collaborative planning process, perhaps facilitated by an outside, independent entity.

Please take a long-term perspective. There is no ecological or economic emergency to substantiate this dramatic water management demonstration project.

At 28,000 acres Lake George is very different from other sites that have used ProcellaCOR in NY.

Thank you, Leigh Youngblood

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: DManchester@sbcglobal.net
Subject: APA Project 2023-0018 Public Comments
Date: Wednesday, May 15, 2024 7:29:24 AM

********** 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 "2023-0018, David Manchester, DManchester@sbcglobal.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: David Manchester
Email from: DManchester@sbcglobal.net
Address: 5177 Sagamore Road Putnam Station, NY 12861
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I have spent considerable time on Lake George annually for more than 70 years. Since 2015, that time has extended to more than 5 months per year. My family and I utilize Lake George water for swimming and throughout our home. Our sustained commitment to Lake George is largely dependent on our confidence about the quality of its water. While I recognize the motivation for inserting chemicals to combat invasive species, I urge the APA to defer this utilization until further research has been completed regarding the impact of such chemicals on those who ingest them.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: amaher@nycap.rr.com
Subject: APA Project 2023-0018 Public Comments
Date: Tuesday, May 14, 2024 8:22:16 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Alan Maher, amaher@nycap.rr.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Alan Maher
Email from: amaher@nycap.rr.com
Address: 22 NORBRICK DR ALBANY NY 12205
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am strongly opposed to any type of herbicide being dumped into any body of water, especially Lake George. This lake is an incredibly beautiful body of water that is free of pollutants, and yet the APA has no objections to poisoning it, as if aquatic grass is the scourge of the lake. Not only do you ignore all amphibious and aquatic wildlife, let's also consider the numerous osprey, bald eagles and king fishers that roam the lake in search of food...of which you've now poisoned.

Your oblivious actions are ignorant, wreckless and endanger the population that live and enjoy the lake either by fishing, swimming or boating. Your lack in understanding the true ramifications of your actions is mind boggling. Your agency, nor the company touting its safety fully understand the health consequences. Does Agent Orange ring a bell?

If you as an agency feel that there are no lingering or immediate health effects to people or animals, your agency as a whole should swim in the water after the application... Be sure to bring the familiy and pets.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: jenniferluce@live.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 16, 2024 2:26:58 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Jennifer Luce, jenniferluce@live.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jennifer Luce
Email from: jenniferluce@live.com
Address: 91 Rockhurst Rd. Queensbury NY 12804
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I'm against pesticide being used in the lake. Lake George is my only source of drinking water, cooking water, etc

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: jlipori@aol.com
Subject: APA Project 2023-0018 Public Comments
Date: Friday, May 17, 2024 8:53:38 AM

********** 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 "2023-0018, John Lipori, jlipori@aol.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: John Lipori
Email from: jlipori@aol.com
Address: 76 Forest Bay Road S. Hague NY 12836
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I have owned a home in Hague, NY across from Blair's Bay since 2003 and have enjoyed visiting Lake George for over 50 years.While our children, grandchildren and extended family and friends enjoy boating, swimming, kayaking and fishing in the lake, it is also our only source of drinking water and we regularly consume the Smallmouth Bass we catch as well..I know that other municipalities have used ProcellaCOR in their lakes, but at least one has found that this herbicide contains a PFAS-containing forever chemical. Having an environmentally conscious state like NY put this chemical in one of it's most beautiful lakes is unimaginable!
Please do not go forward with this plans it could negatively impact our quality of life and heath, not to mention the economic impact to the homeowners and state coffers should the lake water be contaminated.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: drlewis@djmdcorp.com
Subject: APA Project 2023-0018 Public Comments
Date: Monday, May 20, 2024 11:10:23 AM

********** 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 "2023-0018, Daniel R. Lewis, drlewis@djmdcorp.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Daniel R. Lewis
Email from: drlewis@djmdcorp.com
Address: 5274 Lake Shore Drive Bolton Landing 12814
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I object to putting ProcellaCOR in Sheep Meadow Bay and Blairs Bay, due to its negative environmental impact.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: leinoffs@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Friday, May 17, 2024 2:27:54 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Stuart Leinoff, leinoffs@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Stuart Leinoff
Email from: leinoffs@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

I am in favor of the use of ProcellaCOR EC to control Eurasian watermilfoil in Lake George. I have see first hand the proliferation of this invasive species and I feel that hand-harvesting alone is an insufficient remedy. I have investigated the use of ProcellaCOR EC in other similar bodies of water and I am satisfied that the risks of its use are minimal; especially compared to its potential benefit.

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: jphrogger@roadrunner.com
Subject: APA Project 2023-0018 Public Comments
Date: Thursday, May 30, 2024 3:49:08 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Judith Bulova, jphrogger@roadrunner.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Judith Bulova
Email from: jphrogger@roadrunner.com
Address: 21 Pinion Pine Ln NY 12804
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

My family has had a boat on Lake George for years and enjoys the lake and the high quality of the water. I am in favor of the Procell Cor EC application for milfoil control

From: noreply-pc@apa.ny.gov
To: APA Regulatory Programs Comments
Cc: ahlapham@gmail.com
Subject: APA Project 2023-0018 Public Comments
Date: Monday, May 20, 2024 12:57:28 PM

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

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2023-0018, Amy Lapham, ahlapham@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Amy Lapham
Email from: ahlapham@gmail.com
Address:
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Good afternoon,
I am writing to let you know that I am against the usage of ProcellaCOR in any and all areas of Lake George.

Thank you for your time.

Amy Lapham

From: Luca Conte
To: APA Regulatory Programs Comments
Subject: Approval of Procella Cor EC Trial on Lake George
Date: Thursday, May 30, 2024 7:22:14 AM

As President of the Lake Bomoseen Preservation Trust (LBPT) Inc., (Vermont), I would like to add our support to the LGPC's application for the trial of ProcellaCor EC in Lake George in order to control the invasive species Eurasian Milfoil. As boats from lakes in Eastern New York—and Lake George—frequent our Vermont lakes as well, the issue of Milfoil control and containment is equally important to our citizens as to those who live on the shores of Lake George.

Our organization represents hundreds of lakefront homeowners who support this technique after having tried every published method of Milfoil control over the past 40+ years, with minimal results.

It is time to eradicate this pernicious weed before it completely crowds out every native aquatic species in the Northeast, while reducing the water quality of our once pristine lakes.

Sincerely,

Luca E. Conte, Ph.D.
President
LBPT

Barrett
45 Vermont St
Rochester N.Y. 14609
May 16, 2024

A.P.A.
P.O. Box 99
Ray Brook N.Y. 12977

Dear Aaron Ziemann,

I have read the Feb 16, 2024 Objection Letter to the D.E.C from the Lake George Association and the Lake George WaterKeeper, and I support the issues identified therein.

Project 2023-0017
Project 2023 0018

This is the 4th generation of our family to own a lake house on in Basin Bay area. The Adirondacks has beautiful lakes but to us, Lake George is the most beautiful. It needs all the protection possible.

Sincerely,
Nancy Griebsch Barrett

Dear APA,

This is in reference to Project 2023-0017 for Sheep Meadow Bay or Project 2023-0018 for Blairs Bay. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein.

I've been coming to Hague on Lake George for my entire 55 years. My great-grandparents came up in the 1910s. We had a family compound for 74 years and I now own a home in Hague and live here full time. I swim every day possible, as does my precious nephew. I'm a photographer and artist with a focus on the lake.

I'm **completely opposed** to the use of Procellacore in Lake George.

All four towns have officially voted NO to this use. It's use in Lake George is against the instructions on the label. It's made of forever chemicals. It's long-term effects are unknown at this point. Please listen to the people and refused to approve the use of Procellacore in Lake George!

Yours in disgust and serious concern,

Mary Baker
10 Overbrook Rd
Hague NY 12836

From:	Carla Burhoe
To:	APA Regulatory Programs Comments
Subject:	Project 2023-0017,Project 2023-0018
Date:	Thursday, May 30, 2024 9:35:47 AM

May 30, 2024

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

Project 2023-0017; Lake George Park Commission
Project 2023-0018; Lake George Park Commission

Dear Mr.Ziemann,

I am a Past President of the Lake George Association and during my tenure, our organization collaborated with and extensively supported the Lake George Park Commission. We shared a common goal to protect the waters of Lake George and worked through many difficult issues. Some challenges were complex, but we respected the process and respected each other and continued a long history of an unusual collaboration of a State Agency and a Private Non-Profit Group. Lake George was a beneficiary of that partnership.

As the deadline is approaching in yet another year for an opportunity to treat problem milfoil bays in Lake George with ProcellaCor, I wanted to voice my support of the Lake George Park Commission plan. Ever since the LGPC proposed utilizing ProcellaCor, I heard the proposals and processes and results from other lakes including within the Adirondack Park.

As a resident on Lake George, I encourage the APA to continue the approval process for these milfoil treatments and appreciate the number of agencies involved that have studied and approved this method. As Lake George will continue to have new threats and challenges ahead, we need a strong collaborative response to keep Lake George as the Queen of American Lakes.

Sincerely,

Carla Busch Burhoe
3805 Lake Shore Drive
Diamond Point, NY 12824

cbburhoe@gmail.com

From: Bradburn, Isabel
To: APA Regulatory Programs Comments
Subject: Cannot submit comments through the Comment box
Date: Wednesday, May 15, 2024 7:13:30 AM
Attachments: image001.png
Importance: High

Hello,
I tried to submit comments on use of the pesticide ProcellaCOR EC through the form letter (Sheep's Bay) at
https://apa.ny.gov/Hearings/ApaCommentPopup.cfm?ProjectNumber=2023-0018&blm_aid=113593352

Then I tried again through the Blair's Bay link with the same results – since it is the same link, perhaps this should be no surprise.

This is the message:

403 Forbidden

Microsoft-Azure-Application-Gateway/v2

I am appending my comments here to get to the proper people (thank you for delivering) but I look forward to this issue also being fixed.

My comment:
My family and I own property and summer on the Lake every year and have done so since the turn of the LAST century (1900s). I and my family are strongly opposed to the use of ProcellaCOR EC in the Lake.

The reasons are multiple, but the heart of this is this: The detrimental effects of the possible "cure" outweigh the risks of using other, much less invasive and risky techniques to addressing the problem.

ALL the long-term effects of this chemical in water are not well known, but we do know that putting ProcellaCOR EC in the beautiful Lake water will contaminate our drinking and swimming water. Fish and other acquatic life need that water to survive. The relative purity of the Lake water is one of Lake George's primary assets and claims to fame. Why on earth would the LG Commission risk that in any way with this scheme? Chemical "treatment" with pesticides in a lake we love for the quality of its water seems tragically ironic and I urge you please to not take this drastic, misguided step.

Thank you for now and for future generations.

Isabel Bradburn
isbrad@vt.edu
Local address: Jacobi Point, Bolton Landing, NY 12814

ADIRONDACK *a private Camp on Lake George, NY*
PO Box 97, Putnam Station, NY 12861, Phone 518-547-8261 Fax 518-547-8973
www.AdirondackCamp.com

3/2/2023

Aaron Ziemann
NYS Adirondack Park Agency
P.O. Box 99
1133 NYS Route 86
Ray Brook, NY 12977

RE: APA Project No. 2023-0018

Dear Mr. Ziemann,

We are writing to inform you that Adirondack Camp, located on the peninsula in the area of Blairs Bay, is in operation during part of the timeframe you indicate for watermilfoil treatment. We have campers and staff swimming and boating in that area during the dates of 6/10/202 through 8/20/2022. In addition, we rely on lake water for showering and our food service. Our business relies heavily on the usage of Lake George and the area you are planning on treating. We urge you to require the Bureau of Pesticides management to conduct the lake treatment specified well in advance of June. We would like to schedule a call to discuss our questions and concerns. Please reply via email or phone with the appropriate contact and availability.

Thank you,

Shawn Carraher

Shawn Carraher
Owner, Adirondack Camp
603-203-5947
shawn.carraher@gmail.com

March 31, 2022

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

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

Dear Mr. Walrath,

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

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

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

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

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

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

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

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

Environmental Impact Analysis of the Herbicide ProcellaCOR in Lake George

A. Lake George Macrophyte Management

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

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

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

B. Plant Sampling Survey – Method Analysis

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

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

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

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

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

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

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

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

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

C. Algal Monitoring

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

D. Benthic Invertebrate and Zooplankton Monitoring

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

E. ProcellaCor Label Conflicts

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

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

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

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

4. Environmental Hazards - Under certain conditions, treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants, which may cause fish suffocation.

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

6. Resistance Management - ProcellaCOR SC is classified as a Weed Science Society of America WSSA Group 4 Herbicide (HRAC Group O). **Weed populations may contain or develop biotypes that are resistant to ProcellaCOR SC** and other Group 4 herbicides. If herbicides with the same mode of action are used repeatedly at the same site, resistant biotypes may eventually dominate the weed population and may not be controlled by these products.

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

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

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

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

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

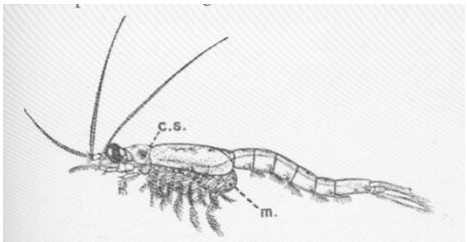

FIG. 16—*Mysis relicta*, ONE OF THE MYSIDACEA. ENLARGED. (From Lankester's "Treatise on Zoology," after Sars.) *cs*, Cervical groove of the carapace; *m*, brood-pouch

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

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

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

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

F. Site characteristics and Toxicity issues

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

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

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

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

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

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

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

H. Ecological Based Uncertainties to the Risk Assessment

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

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

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

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

Future Needs:

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

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

Very truly yours,

Carol D. Collins, Ph.D.

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From: John Costas
To: APA Regulatory Programs Comments
Subject: Comments on Herbacide
Date: Wednesday, May 15, 2024 6:38:42 PM

As a more than 30 year homeowner on Lake George in Bolton Landing, I am deeply concerned by your proposal to use ProcellaCOR in our lake. We drink and recreate in the lake water and from everything I have read, there are still unkown risks associated with this chemical.

Please reconsider and condust further examination before moving forward.

Best,

John Costas

From: Monica DiLorenzo
To: APA Regulatory Programs Comments
Subject: Comments on LGPC Project #2023-0018
Date: Thursday, May 16, 2024 4:47:30 PM

Dear LGPC,

I'm writing to urge you STRONGLY to keep ProcellaCOR out of Lake George. I grew up there and still enjoy a family lake house and boat there on vacations every summer, and I'm thrilled I can now bring my own daughter to grow up there as well, but I'm also worried she won't enjoy the pristine waters I have in my life so far.

I am shocked the LGPC is not listening to the science on this topic. Evidence of the problems with ProcellaCOR is only just starting to come out, and I am very concerned that once the Park Commission starts down this slippery slope of chemical treatments, there's no going back. It is very unnecessary and extremely unwise to take a chance.

Eurasian watermilfoil is not a crisis or a danger - it can be removed by non-chemical means safely and kept in check until more thorough scientific studies are done on chemical treatments, IF they are needed at all.

I want to continue enjoying Lake George, and I want my daughter to. I even hope to retire in the area many years from now, but I'll need the lake to be healthy in order to do that. PLEASE listen to the science and those of us in love with the lake and not special interests or the chemical industry - I have no stake in this other than wanting clean water and a healthy ecosystem, but ask yourself what those pushing an unproven, unnecessary treatment for a non-critical plant have to gain and I'm sure you will see their true intentions. Keep ProcellaCOR out of Lake George. Thank you!

Sincerely,
Monica DiLorenzo, MD

February 21, 2024

Board of Directors of the Lake George Association, Lake George Water Keeper, Brian Primo, Aaron Ziemann and Adirondack Park Agency Board Members,

In consideration of the pending application for the approval of ProcellaCOR, I am in support of its use in Lake George.

I wrote to the Adirondack Park Agency with copies to Dave Wick, Jeff Killeen, and Eric Siy in April of 2022 about my support for the use of ProcellaCOR in Lake George. (See attached letter.) Since that time, I no longer financially support the Lake George Association. Instead, I have increased my donations to the Lake George Land Conservancy. I am still upset by the tactics that have been used to get people to support the views of the present LGA. They do their best to push people to believe that they have all the answers and that they are the only organization that really cares about the lake. In my view they sit in a bully pulpit. In the first mass email (shortly after the merger with the FUND for lake George) they bullied people to sign against ProcellaCOR and agree with them. The old LGA email list was used in a manner that had never been used before.

When I attended the February 17, 2023 hearing at The Warren County Municipal Center the new LGA said 4,500 concerned citizens were opposed to ProcellaCOR. If all of those people were well informed about both sides of the controversy, there would not be that many siding with the present LGA. I have spoken with many who were blindsided with that initial petition and now believe that ProcellaCOR is worth trying and would not have signed it had they been better informed. Of course, there was no mention of anyone opposed. I was also upset that I never received any response from Jeff Killeen or Eric Siy that they had even received my letter of April 4th, 2022. That shows poor leadership and poor communication skills on their part.

The LGA rounded up a big audience for the February 17, 2023 hearing before Judge Michael Muller so it appeared that they had huge support. There was no mention that the town of Huletts Landing did not join in this law suit. It is a big lake with lots of people who live on the lake. Dave Wick is very professional and does not resort to the tactics used by the LGA to get people to side with him and the LGPC. Thomas West was loud and very effective in presenting the case of the LGA as opposed to the demure Park Commission Assistant NYS Attorney General, Joshua Tallent. Of course, there was no mention of Jeff Killeen's 12-month study by the LGA, at their expense, to answer the safety of this product. (Lake George Mirror May 20, 2022) Chris Navitsky can be quite confrontational and tends to weigh in on the negative side of issues like the setbacks on stream corridors. He could start with a positive approach before he puts out misleading information to find solutions before pointing out problems.

The new LGA wants to continue to hand harvest Eurasian watermilfoil, which I hope continues in some areas. However, according to a recent Post-Star article, the new LGA only spends

$140,000 and the Lake George Park Commission spends $304,718.75 to treat Eurasian milfoil. The new LGA, which is well endowed, should be spending more money than the LGPC. If the LGA is so concerned about hand harvesting, why did they stop hand harvesting of Asian Clams in the lake? We no longer have 2 days in Sandy Bay where we hand harvest Asian Clams because the LGA put a stop to it as it disrupts the environment. BUT –Hand harvesting of Eurasian milfoil is okay???? Their arguments make no sense.

I hope that ProcellaCOR can be as effective in Lake George as it has been in many other lakes in this area, not all of which have no moving water as the LGA claims.

I believe Mark Frost, editor of The Chronicle in Glens Falls, has a clear understanding of the current LGA. I attached an article he wrote on October 6, 2022.

I will end with quoting what Gordon Woodworth recently wrote in The Post-Star as the search for a new LGA executive director continues, “Will the new LGA be kinder and gentler, or continue to be aggressive and confrontational?”

On a different matter, I would like to see the LGA require rental boats to have a sticker, which they design and provide, on the dashboard asking that people do not feed the ducks on the lake. I frequently see this happening in Sandy Bay. On many occasions I have kayaked out to ask them to stop. Many are cooperative, but some are confrontational. Since most of these rental companies have agreed by signing up to be water keepers with the LGA, it seems to me that the LGA could have these water keepers help out with this issue. The Village of Lake George has permanent signs that tell people not to feed the ducks. Why can’t the LGA help to do their part?

Carolyn Curren, Rockhurst, summer resident

18 Heritage Point; Queensbury, NY permanent residence

Cc: Dave Wick and Lake George Park Commissioners, Mark Frost

From: anastasia daley
To: Ziemann, Aaron C (APA); Primeau, Brian (DEC)
Subject: ProcillaCOR
Date: Saturday, March 2, 2024 8:11:44 AM

To whom it may concern,
My name is Stacie Daley and I wanted to take a moment to share my endorsement in regard to the use of procillaCOR in Lake George. Having lived in the area my whole life, enjoying Lake George has certainly been a highlight of being a local resident. ProcillaCOR has been a proven and safe way to address the issues that Lake George is facing. I hope that the decision to move forward with this application will be enacted, and Lake George waters will be kept pristine and clean. Thank you, Stacie Daley

From: Meghan Jebb
To: APA Regulatory Programs Comments
Subject: Do NOT put ProcellaCOR or any other herbicide into Lake George
Date: Wednesday, May 29, 2024 12:20:55 PM

Dear APA,
Once again, please do not put ProcellaCOR or any other synthetic chemical into drinking water. I have a PhD in chemistry and would not trust the current system to protect us and our children and pets from pernicious chemicals. All additives must be considered guilty until proven innocent. Please, find a first-do-no-harm method to remove milfoil, without the use of synthetic chemicals. It is extremely difficult if not impossible to determine the long-term effects of this ill-studied chemical on a drinking water supply, and the harm may not be identified for decades to come, when it is too late to rectify. Do not let the solution be worse than the problem.
Thank you.
Sincerely,
Meghan Jebb


NO!!
chemicals
PLEASE
DON'T
PUT
CHEMICALS
IN The
LAKE!

I go to lake george all the time in the summer and love swwimming. We go on boat rides and jump of the dock and summer house! It is so fun! I invite people (friends) to come stay there in the summer. ~~I~~ I wouldn't want to Swim in the lake if there where chemicals in the water! ~~Swimi~~ Swimming is my favorite part of going to Lake George. if there where chemicals I wouldn't Swim and ~~It~~ would ~~AOA~~ not be fun! I spend most of my time swimming!

thank you for reading my letter!

RECEIVED
ADIRONDACK PARK AGENCY
MAY 20 2024

from: Eliza

look on the back →

10 years old!

Adirondack Park Agency project ID 2023-0017
Division of Regulatory Programs
PO Box 99 1133 NYS Route 86
Ray Brook, NY 12977
Aaron Ziemann
RPcomments@apa.ny.gov

May 15 2024

submitted via email

Dear Sir,

I am absolutely opposed to the use of the chemical herbicide ProcellaCOR in Lake George.

There is no need for me to copy and paste from websites that state all the facts as to why this herbicide should NOT BE ALLOWED TO be used in Lake George without more tangible evidence of its environmental impact. You can find those facts on the Lake George Association and the Lake George Water Keepers websites.

My family and I own 2 homes on Lake George and we have lived there for 2 generations. We DRINK THE WATER and depend on this lake to survive for generations to come. Our homes are directly across the lake from Sheep Meadow Bay and could potentially cause irreparable environmental harm by using a herbicide that HAS NOT BEEN SUFFICIENTLY TESTED IN ORDER TO ASCERTAIN THE IRREVERSIBLE IMPACT IT COULD HAVE ON THIS LAKE.

The Lake George Park Commission used to work WITH the two other groups stated above to protect this lake but apparently they have lost all reason and will possibly create devastating harm to a living lake if the use of this herbicide is allowed to move forward.

It is questionable as to why the LGPC have forced new septic system regulations on homeowners costing us $60,000 -$100,000 and instituted other inspections meant to protect the lake yet allow THIS project to continue without more research on the books. Being forced to spend this amount of money to protect our lake and protect the value of our homes and then threaten the very lake we are trying to protect is the definition of insanity.

If the Lake George Park Commission had spent more time and money keeping boats off the lake that bring in the invasives we wouldn't be here today. The traditional methods of battling milfoil have been working.

Why would anyone with any knowledge of the dangers put a pesticide in a pristine lake!

My friends, family and neighbors work every day to protect our lake and the science and testing has NOT PROVED THAT THIS IS A SAFE COURSE OF ACTION.

Please support and protect our Queen of American lakes, one of only two left in America. STOP THIS PLAN TO PUT PROCELLAcor IN LAKE GEORGE.

Respectfully, Robin Emery

Robin Emery - member/owner with my siblings Sinkway Family LLC

24 Ferndale Ave. Glen Rock NJ

11 Silver Bay Rd Silver Bay NY 12874

Albert F. Freihofer
P.O. Box 184
Cleverdale, N.Y. 12820

RE: Project 2023-0017: Introduction of ProcellaCOR to Sheep Meadow Bay and Blairs Bay in Lake George, New York

Dear Governor Hochel, May 29, 2024

As a lifelong (72 years and counting) and fourth generational seasonal resident of Lake George, I write to add my voice in strong opposition to moving forward with the application of ProcellaCOR to Lake George at this time. The February 16, 2024 Objection Letter to the DEC from the Lake George Association makes a compelling case for continued scientific study, patience, and caution, *an institutional wisdom that I wholly support*. Once we add this chemical to our lake - which I and my neighbors rely on for drinking for almost half of each year- we have taken a step we cannot undo. I am convinced that the community at-large does not yet know enough to mitigate the risk of application, and I am distressed and frankly perplexed at the sense of urgency to get this done. The upsides of this "test" are minor and yet the downsides are potentially enormous, especially for those of us who rely on Lake George for our daily drinking water for six months or more each year.

I have great respect for the people and work of the Lake George Park Commission and carry deep appreciation for their stewardship of this extraordinary lake, yet I am confounded at what seems to be a relentless, pell-mell urge to conduct an experiment on a body of water which, even with its faults, remains *Best in Show*, an application of chemicals which once applied, cannot be undone. We simply don't know enough to take the chance. My granddaughters will I hope be the sixth generation of my family to live on this lake and believe me, if I thought ProcellaCOR was a way to convey a legacy of a "clean" lake to them, I'd be all for it. ProcellaCOR isn't necessary at this time, but further scientific study and public discovery and full disclosure certainly is.

I'm not a scientist but I have experience, patience, and curiosity. Two summers ago, as a newly retired teacher and in the interest to actually see and learn firsthand the environmental challenges of New York's other wonderful lakes, I took the time to row the entire shorelines of each of the eleven Finger Lakes in my Adirondack Guide Boat. (elevenlapsaround.blogspot.com) Almost four hundred miles of rowing over two weeks and scores of conversations with residents, scientists, policy makers, advocates, and volunteers across the state convinced me that it would be negligent at best and criminal at worst to fiddle with our lake in the promise or hope of an easy fix to an otherwise presently manageable problem….especially considering all that we do NOT know about the long-term and possibly irreversible effects of ProcellaCOR.

Please, do not permit this test of ProcellaCOR to take place. We still have too much to learn, and Lake George deserves our patience and wisdom.

Sincerely,

Al Freihofer

CC APA, LGA, *Lake George Mirror*

From:	Taka Kokabu
To:	APA Regulatory Programs Comments
Subject:	Fwd: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date:	Thursday, May 30, 2024 10:37:52 AM

Hello APA,

I am a Professional Engineer that lives in Hague, NY with Lake George as our tap/drinking water with experience in water treatment and wastewater treatment, and modeling of discharge/exhaust, etc.

I am writing to OPPOSE the application of ProcellaCOR into Lake George.

There is a government agency in Minnesota that classifies this as a PFAS. Whether NY or EPA does or not, one agency calling it such is enough to take pause. I've also talked to multiple scientists who agree with this assessment.

With articles like the following, talking about the toxicity of PFAS in our drinking water, and possible lawsuits coming, I'm very concerned about this chemical getting into Lake George, our tap/drinking water.

- https://www.newsweek.com/drinking-water-map-states-high-contamination-levels-1905053
- https://www.propublica.org/article/propublica-3m-pfos-forever-chemicals-investigation
- https://www.allsides.com/story/environment-your-drinking-water-safe-forever-chemicals-raise-contamination-concerns

Please do not poison me, my wife, and especially my 1 year old old baby!

If this gets into the lake, can you let me know who will be liable for lawsuits in the future? APA or LGPC?

As companies like Monsanto are constantly being fined (a recent single case cost them $11 billion) for Roundup that was first introduced in 1974, it's crazy that a product so new can be considered to be extensively and fully researched and determined to be safe. It takes decades to make such determinations, and to contaminate our beloved lake is absurd.

I also know that this location has not been managed for about a decade each - and locals are not complaining (I know, we live here). So this is an added cost of $19k to the LGPC and taxpayers to poison our lake. If the proposed location was a location currently being managed, at least the "cost savings" excuse can be used.

If you are looking for other ideas to help with the growth of the native plants, I would suggest a moratorium of RoundUp and other herbicides/pesticides around the lake and in the watershed. Other chemicals from lawns and landscapes definitely get into

the lake. I've had at least one person who works closely with the LGPC on the science-side admit that such a measure would almost definitely help with the growth of native plants and the cleanliness of our lake. Would you be willing to propose such an idea for Lake George or even the Adirondacks in general?

Let's stop the ideas that chemicals can save us and get back to how we can get to the root cause of these issues.

Thank you,

Taka Kokabu
Hague, NY

From: Leigh Molinari
To: APA Regulatory Programs Comments
Subject: Fwd:
Date: Wednesday, May 15, 2024 3:34:07 PM

---------- Forwarded message ---------
From: **Leigh Molinari** <leighmolinari@gmail.com>
Date: Wed, May 15, 2024 at 3:31 PM
Subject:
To: <rpcimments@apa.ny.gov>

Project 2023-0017
Project 2023-0018

I have read the Feb 16, 2024 objection letter to the DEC from the Lake George association and the The Lake George Waterkeeper. I support the issues identified therein!!!!
I swim and play in the waters. There is a lack of knowledge about this pesticide. I'm from downstate and know better then to mess with nature!!! Careful!!

TO:
Aaron Ziemann
Adirondack Park Agency
PO Box 99
NYS Route 86
Ray Brook, NY 12977

RECEIVED
ADIRONDACK PARK AGENCY
FEB 21 2023

Project No. 2023-0017

Comments of opposition have already been submitted to the APA, DEC and LGPC for 2022 and 2023.

I am a riparian landowner in the location of the potential application and I am strongly opposed to the use of ProCellaCor in Lake George as per this notification.

I am concerned that there has not been enough testing of this chemical, how it will affect plant and animal life specific to Lake George waters and how it will negatively impact the shoreline.

This objection is for the application specifically at Sheep Meadow Bay that is being applied for to be executed in May/June of 2023. Prior objections in more detail have been made and noted for the same application in May/June of 2022.

The bay that you have named Sheep Meadow Bay, which is inaccurate, is a breeding ground for many protected species of fish. The area is unique with a stream that feeds the lake through a beach area. This area is prone to material from the lake washing up on it including potential dead and toxic Milfoil should you administer the chemical into the water in this location. This is a highly trafficked area from swimmers to skiers and children playing on this beach and swimming in the surrounding dock areas.

How will the cleanup of this process be handled and when will surrounding landowners be notified should this application have an unexpected fallout? This question remains unanswered by the LGPC and needs to be addressed prior to any process.

This area has lake feed watering systems for plants, lawns, and vegetable gardens. There is a notice for all clear for lawns after a set period of time but no mention of vegetable gardens. Considering that the chemical data sheets for the pesticide being proposed says that areas should "exclude greenhouse and nursery irrigation", we find that to be very concerning.

As the houses in the area are often rented, what notifications should be given to renters about this application and a potential loss of income should they chose to not rent due to this process? Who will be responsible for loss of revenue claims.

There is also a concern that this process losses effectiveness which means the milfoil becomes resistant. Since re-treatment is not recommended according to their publication, what steps are taken from there. These are just a few of the many concerns that we find to be objectionable.

Thank you,

Louise Grogan

4 Deer Run Way
PO Box 200
Huletts Landing, NY 12841
May 27, 2024

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

Re: Project 2023-0017 Sheep Meadow Bay
Project 2023-0018 Blairs Bay

Dear Mr. Ziemann,

I hereby object to the application of the herbicide ProcellaCOR in Lake George for the purpose of eradicating Eurasion Watermilfoil in Sheep Meadow Bay and Blairs Bay. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. In general, some of the issues include:

- All permit application requirements have not been met.
- ProcellaCOR is intended to be used in quiet and quiescent water bodies. Lake George is not such a water body. Based on research and data collected by the Jefferson Project over the past two years, there are significant horizontal and vertical water currents in the lake.
- Impacts to aquatic vegetation, benthic invertebrates and fish have not been adequately studied.
- There is a lack of knowledge about the long term effects of the herbicide.

I have been coming to Lake George for 74 years. My parents first brought me here to camp on the islands from New Jersey when I was 2 years old, and I've been coming to the lake every year since then. I purchased a house in Huletts Landing in 2003, and now drive up from Pennsylvania. It takes me 6 hours but this is where I want to be. My family and extended family enjoy swimming, water skiing, tubing and fishing, and eating the catch. These activities all involve absorption or ingestion of lake water. I have no desire to spend my summers anywhere else and we have a great community here in Huletts. I remain proud of how Lake

George is one of the cleanest lakes in America, and would not want to see the natural resources within damaged by the application of ProcellaCOR in the lake.

Sincerely,

Alexander Haring

From: Kathy Muncil
To: APA Regulatory Programs Comments
Subject: I am in favor of the use of Procellocor in Lake George.
Date: Thursday, May 30, 2024 4:01:42 PM

Thank you
Kathy

Kathryn Flacke Muncil

Chief Executive Officer
The Fort William Henry Corporation
48 Canada Street
Lake George, NY 12845
cell - 518-796-6580
office - 518-964-6620
kathym@fortwilliamhenry.com

From: Ben Falk
To: APA Regulatory Programs Comments
Subject: I oppose ProcellaCOR in Lake George
Date: Wednesday, May 29, 2024 1:44:25 PM

It’s incredibly short-sighted to put this chemical (and others) into a drinking water supply in an attempt (which has never been successful long term) to mitigate problem plants.

Thank you for your consideration,
Ben and Erica Falk
802-343-9490

John E. Kelly III, PhD

241 Assembly Point Road
Lake George, NY 12845

75 Mountain Creek Road
Poughquag, NY 12570

May 27, 2024

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

Subject: Projects 2023-0017 & 0018; LGPC application to use ProcellaCOR in Lake George

Dear Mr. Ziemann,

I am writing to vehemently oppose the LGPC's application for a permit to introduce the herbicide ProcellaCOR into Lake George.

As a life-long family resident of Lake George, I know the value of our special lake. As a business leader, and large investor in lake real estate, I understand the economic value of LG's pristine waters to our economy. As a scientist, I deeply understand the many issues surrounding the risks associated with introducing such a chemical (for the first time) into a complex ecosystem.

I have read the February 16, 2024 Objection Letter to the DEC from the Lake George Association and the LG Waterkeeper, and I support the issues identified therein. Specifically, I fully endorse the LGA's positions on this matter, including:

1) There is no crisis, and it is NOT necessary at this time.
2) There are many KNOWN risks of using this herbicide in LG, which is unique among water bodies globally. Top among these risks are the collateral damage to non-target native species both within the treatment area, and outside that area due to unique water circulation in our lake.
3) There are also many UNKNOWN risks that simply have never been studied. Chief among these are the impact on the entire food web (vs individual species), and the long term effect of this chemical on this web.

I urge you to reject this application at this time, and instead pursue further scientific studies, as well as a comprehensive invasives control master plan.

Sincerely,

John E Kelly III

May 15, 2024

To Adirondack Park Commission:

I urge you to reject the permit application from the LGPC to put ProcellaCOR in Lake George (Project 2023-0017). My family has lived in Hague since the 1880s, and we have always been active in protecting the pristine water quality of Lake George for future generations. And we will continue to be active – which is the reason for my comments on this project.

Although I understand that the invasive milfoil plants are present in Lake George, that is no reason to treat them with a chemical that we do not know the long-terms effects of. I do not put herbicides in my yard or garden. I pull the weeds by hand. Hand-harvesting keeps milfoil under control in Lake George. The LGPC argues that it's expensive. But I and many others are willing to help with those expenses, through our tax dollars and our contributions to the LGA. The LGA, as you may know, contributes annually to the cost of hand-harvesting of milfoil. The remainder of the cost is paid for by taxpayers.

I don't think that protecting Lake George should come down to a question of expense. This unique natural resource is irreplaceable. Once chemicals are put into it, they can never be removed. This decision is forever. Do you want that to be your legacy – that you approved a chemical that turns out in the future to be detrimental to the health of people and animals and/or that upsets the ecology of Lake George? I think not.

All four town governments in the north basin as well as thousands of people have stated on the record they do not want this chemical in our lake. Riparian owners do not want it. Who does want it? Basically only the Lake George Park Commission? Thanks to the Jefferson Project, there is arguably more data about Lake George than about any other body of water in the world. A summary of this scientific data that demonstrates the risks of ProcellaCOR in Lake George has been presented to you by the Lake George Waterkeeper. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. How can the APA and the LGPC ignore this science and move forward with this project, over the objection of the vast majority of residents and municipalities?

You have the opportunity to choose between 1) allowing the LGPC to use this chemical or 2) denying the permit. Hand-harvesting works. Milfoil is not a crisis in Lake George. But putting ProcellaCOR into the Lake could very well create a crisis. You hold the power over this permit. Please use it wisely.

Thank you very much for your very careful consideration of the consequences of your vote.

Ginger Henry Kuenzel

From: Jerry Bonnabeau
To: APA Regulatory Programs Comments
Subject: Lake George
Date: Friday, May 17, 2024 7:33:50 AM

Good morning ,

I'm writing this morning to express my opposition to the proposed chemical treatment for milfoil in Lake George. I keep a boat at Norowal Marina and spend 20-30 days per summer at the Lake. We have been looking to buy a residence as well. I'm putting the latter on hold as I'm very concerned about the fate of the Lake and subsequent property value decrease if the treatment occurs and alters the water quality. I've been impressed by the efforts that have been made to control milfoil without chemicals and do not believe that the current threat warrants the proposed treatment.

Feel free to contact me with questions.

Jerry
781.354.4650

From: Walt Lender
To: APA Regulatory Programs Comments
Subject: Lake George herbicide treatment
Date: Thursday, May 30, 2024 10:25:08 AM

Hello
I am writing to express my strong support for the Lake George Park Commission's application to use Procellacor to control milfoil in several bays in Lake George. The treatment is proven to be effective and harmless to the environment.

As the former executive director of the Lake George Association I am appalled at the misinformation campaign they have undertaken. Their opposition is misguided and costing taxpayers thousands of dollars.

Personally, I live on the lake just a few miles from the treatment areas and my family and I consume the water as our household drinking supply. Knowing the science behind this plant growth hormone I have no concerns whatsoever about its effects on my family's health.

Please act favorably on the LGPC's application so we can have a chance to save these bays from the very real threat of dense milfoil overgrowth.

Sincerely

C. Walter Lender
waltlender@gmail.com
518-524-1112 (cell)

From: Patrick Dowd
To: APA Regulatory Programs Comments
Subject: Lake George Procellacor application Letter Of Support
Date: Thursday, May 30, 2024 12:07:57 PM

Good afternoon,

I am writing in support of the Lake George Park Commission's application to use Procellacor in two bays in Lake George to eradicate an invasive species, Eurasian watermilfoil.

I am not an expert in herbicides, nor in chemical uses.

I am, however, fairly well read, and know advocates on both sides of the issue.

I grew up every summer in Lake George, and until 2021 worked in the region to protect the water quality.

I even had the licence plate "PRTCT LG" on my car when I worked up there, so you could certainly call me an interested party.

What's clear to me is that the state agency that is responsible for protecting Lake George's water quality -- and that has spent tens of thousands of dollars in state funds to manage this invasive aquatic species -- has also spent thousands of work hours investigating, reviewing and sorting through the information and the data on the use of Procellacor.

What's also clear is that this state agency would never propose something like this without due and full consideration of its safety and its efficacy.

I know that there are no restrictions on drinking water, fishing, swimming or any other use after application -- even immediately after the application.

I have read that there are more than 150 successful and safe applications of Procellacor in water in the Northeast, and that the project here is considerably smaller than other projects completed safely in our region.

I know that the DEC has determined that Procellacor is not a forever chemical, no matter what the hysteria otherwise contends.

I urge the APA to approve this project to protect the Lake's water and -- hopefully -- save investment by the Park Commission and other organizations that can be put to good use elsewhere.

Sincerely,

Pat Dowd

May 16, 2024

Dear APA,

This is in reference to Project 2023-0017 for Sheep Meadow Bay or Project 2023-0018 for Blairs Bay. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein.

I am very concerned about putting this chemical in our lake! This lake is a jewel of a lake like very few others in the world and the chemical would compromise that.

I have grown up on this lake in Hague and swim around the islands nearly every day in the summers. I am a third generation resident of Hague. To think there would be unnatural chemicals in the water is very disturbing! I know too that many homes in the northern basin still pull from the lake for their drinking water.

Lake George is different than the other lake participating in this program, being spring fed and a water that flows. As I understand it, this chemical is reliant on the water being still.

The harvesting of milfoil seems like the preferred strategy to control that situation.

Our bigger concern up this way are the Cormorant birds are polluting the lake. They are killing the trees on our islands, and their excrement actually makes the whole bay smell terrible. This also attracts an inordinate number of sea gulls adding to that mess. We don't even swim near those islands as we are concerned about all that is in the water where they all are.

Please take into consideration how extremely concerned the residents of this area are about this chemical solution to this issue.

Thank you for your consideration,

Janet Lawrence

J Lawrence

Arthur J. Levy
7258 Knighten Way
P.O. Box 17
Huletts Landing, NY 12841
518.499-0172

RECEIVED
ADIRONDACK PARK AGENCY
FEB 17 2023

Tuesday, February 14, 2023

Reference APA Project No. 2023-0017

Dear Aaron Ziemann,

I received the map of the proposed ProcellaCOR trial. The highest concentration of milfoil in the proposed region is slightly west of the map "project site." Enclosed is the APA map with the concentration shown in green.

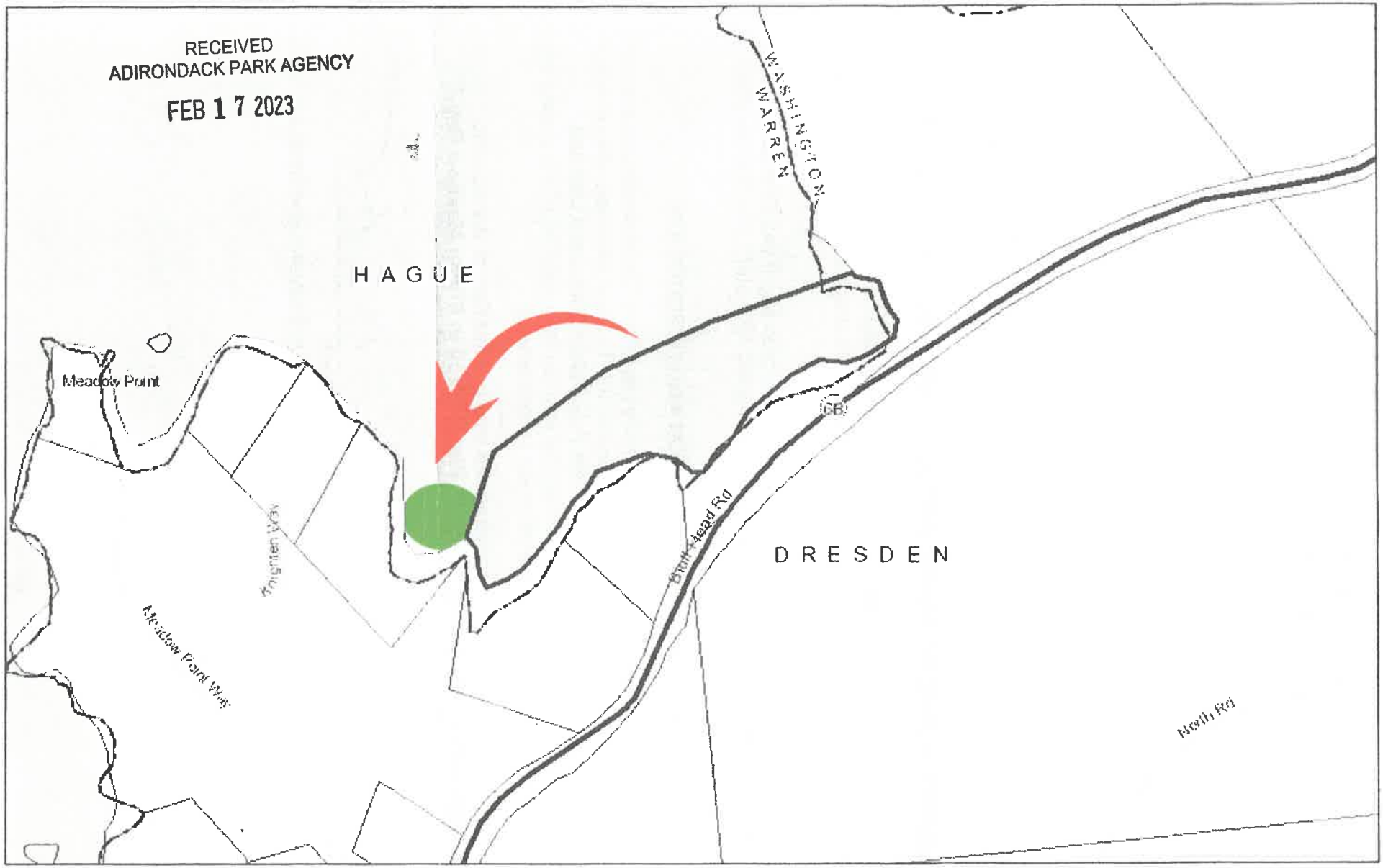
I know that area well. The green circle shown is around my dock and seems to be the source from propagation and fragmentation. The rate of milfoil growth has been astounding this past season. I welcome the use of ProcellaCOR to arrest this growth.

Sincerely,

Arthur Levy

P2023-0017 Location Map

RECEIVED
ADIRONDACK PARK AGENCY
FEB 17 2023



2/3/2023, 11:21:28 AMThis is advisory only, not to be used to confirm exact boundary location or for determining Agency jurisdiction.

APA Project Review Sites _Query result

Parcels 2021

Park Boundary Blueline

NYS Adirondack Park Agency

NYS Adirondack Park Agency

Lake George WATERKEEPER®

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March 16, 2023

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

Mr. Brian Primeau, Bureau of Pesticide Management
New York State Department of Environmental Conservation – Region 5
232 Golf Course Road
Warrensburg, NY 12885-0220

RE: Lake George Park Commission – Applications for usage of ProcellaCOR Herbicide in two demonstration test Bays:
Sheep Meadow Bay, Hague (T) - APA Project No. 2023-0017
Blairs Bay, Hague (T) – APA Project No. 2023-0018

Dear Mr. Ziemann and Mr. Primeau:

The Lake George Association ("LGA") and the Lake George Waterkeeper ("Waterkeeper") are writing you to specify additional items we deem incomplete in the pending Permit Applications from the Lake George Park Commission ("LGPC") cited above. We do so with a clear view to our mission and the LGPC's statutory mandate – both dedicated to protecting the water quality and watershed of Lake George. This commitment focuses on the uniquely special resource that is Lake George, whose Class AA-Special waters, the state's highest water quality designation, are a drinking water source for thousands of local people and visitors, and the lifeblood of a $2 billion tourism economy. There is only one Queen of American Lakes, and it is Lake George.[1] Keeping the Lake clear and clean by doing everything possible to reduce mounting water quality threats and secure the Lake's natural resilience is paramount. This includes giving the level of scrutiny necessary, and warranted, for what would be the first-ever use of a chemical herbicide in Lake George.

With this in mind, the LGA and the Waterkeeper have reviewed copies of the above referenced applications submitted to the Adirondack Park Agency ("APA"), dated February 1, 2023, and the APA's Notice of Incomplete Permit Application, dated February 21, 2023, as well as the New York State Department of Environmental Conservation ("Department") application dated January 19, 2023. In addition to the material cited in the APA's Notice of Incomplete Permit Application and documented in our February 13, 2023, letter to the Department, we are submitting the following

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1. **The APA Application is in error for failing to accurately identify the involved wetlands. (Item 13 a & b)**
   Items 13.a and 13.b ask if there are any wetlands on the project site and if any activity listed is proposed to occur within the boundaries of a freshwater wetland, which includes applying pesticides. These questions are both answered as "No." In point of fact, there are wetlands present at both of the proposed project sites, which is why permits are required. This should be corrected.

2. **The Adirondack Park Agency should reclassify the freshwater wetland rating associated with the Sheep Meadow Bay application (2023-0017) based on §578.5 of the Adirondack Park Agency Act.**
   The Sheep Meadow Bay wetland, a deep water marsh, has a value rating of 3 according to the 2022 application. However, it appears that there are multiple values associated with this wetland that would raise the wetland value rating, such as the presence of (c) emergent marsh, (k) wetlands associated with open water providing spawning areas and (q) wetlands containing an endangered or threatened plant species. As is reflected below, there is a need for an expanded plant survey due to the expanded treatment/dilution zone that will result in the drift of the herbicide based on Lake George circulation, hydrodynamics, and temporal components. When the additional values and expanded area are taken into consideration, the wetland is properly classified as having value 2 or 1. Reconsideration of the valuation process is further justified by the decision handed down by the Appellate Division, Third Department, on March 2, 2023, in *Matter of Thomas Jorling v. APA,* which confirmed that the APA has not been following its own regulations when classifying wetlands.

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   The dilution zone area/project area is based on the "Aquatic Pesticide Downstream Modeling worksheet" prepared by the New York State Department of Environmental Conservation, which states as its Purpose: "This spreadsheet can be used to estimate concentrations of substance and travel time to a given point in flowing waters. It is assumed that the only major processing is dilution and a first order decay (if applicable). Dilution is estimated using the area of the target watershed or point on a stream and a corresponding United States Geological Survey (USGS) reference gage from which the flow of the watershed in question may be obtained by correlating it to the flow and corresponding area from the reference gage."[2]

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Therefore, the worksheet as used is incomplete and arbitrary as it assumes simple uniform mixing for dilution into an incorrectly closed and arbitrarily defined volume of the Lake as if there is no water flow at all. This worksheet is too simplistic for application on a water body like Lake George with its complex circulation patterns and hydrodynamics. To correct this deficiency, the applicant should be required to use dye testing under all possible weather conditions and determine water velocity through actual measurements to ensure the "treatment zone/dilution zones" are accurately predicted. This analysis is critical to the application process because it defines the potential area of impact, which must be considered as part of the regulatory analysis. It also affects the notification that is required to riparian owners.[3]

4. **The Project Applications are incomplete as they fail to meet the APA's requirements for a plant survey and are not compliant with the APA's Specific Incompletion Requirements ("SIR") for aquatic herbicides as detailed in the following:**

   - The applications are supported by a rake-toss survey supplemented by a swim over survey. These survey techniques are improperly implemented for an experiment on Lake George involving the first use of a chemical herbicide ever. More properly, more detailed surveys are necessary. The applications should be supported by a Point-Intercept Method (PIM). A PIM survey requires a grid to be established to enable "survey locations to capture variations in depth and micro-habitat types which may occur within and adjacent

[3] It is notable that the arbitrary shaping of the dilution zone (by the applicant) ultimately determines which nearby property owners will be notified of the herbicide application, thus making the very selection of notified property owners itself arbitrary. There is a real possibility of the herbicide escaping the dilution zone in concentrations sufficiently high to warrant expanded property owner notification of water use restrictions, etc. Perhaps this is the reason that NYSDEC Policy DSHM-PES-05-05 Aquatic Pesticide Permit Program Item 9 Riparian Owners and Users states "Affected riparian owners/users shall be those riparian owners/users located within one-half mile of the treatment zone."

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- While the surveys have sufficient points displayed, they do not have 36 vegetated points for either bay test area as required by the APA's SIR. Sheep Meadow Bay has 40 points, but only 33 points with vegetation, which falls short of the required 36. Blairs Bay has 38 points, but only 32 vegetated points. In addition, the APA's SIR requires 12 vegetated points within the treatment area and 24 outside the treatment area. Blairs Bay has less than 24 vegetated points outside the treatment area. Again, this falls short of the Agency's requirements.

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- Guidance on how to properly perform surveys and dye testing in Lake George can be found in the prior precedent of the APA concerning the Sonar permit applications that resulted in permit denials by the APA.

5. The Project Applications are incomplete as they fail to provide adequate survey coverage and the report material is misleading as demonstrated by the following:

- The survey area is incomplete and should be expanded based on the discussion in item 3 above and the failure to incorporate lake hydrodynamics and temporal components due to wind on, and tributary stream inflow into, the treatment/dilution areas/zones.

- The Point-Intercept Method is typically used for pre- and post-management as a regulated manner for estimating macrophyte distribution and abundance throughout the potentially impacted area. By ignoring this protocol, the applicant has failed to supply complete surveys for the actual distribution and abundance of the macrophytes present. The 2022

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swim-overs provide supplemental information and expose the inadequacies of the initial survey work with the identification of additional species, including more locations of native milfoils (*M. Alterniflorum and Myriophyllum tenellum*) and multiple protected species such as *Isoetes lacustris, Bidens beckii, Myriophyllum alterniflorum* per New York Natural Heritage Program.

- In addition, insufficient documentation is provided for the supplemental swim-over surveys. The identification of the persons performing the survey and macrophyte identification is unknown and credentials to perform such a survey are unestablished. As previously noted, plant diversity is high in Lake George; many species are less common and require experience and background with complex identification. Photos of newly identified plant species would help make up for the lack of credentials; however, no photos are included in the supplemental survey information for 2022. Moreover, the date is missing for the supplemental survey, which would further help determine the identification of the plants species, as many of the species listed can look similar without reproductive or mature structures. For example, the (immature) basal rosette of *Sagittaria graminea* can look like the rosettes of *Isoetes sp.* or *Eriocaulon sp.* and would require a flowering stalk or spore-presence for identification confirmation. Without photos, survey dates or abundance and location data, there is little proof that this survey even took place.

- No identification has been confirmed for the four narrow-leaf pondweed species during either survey, which could include additional protected species: *Potamogeton diversifolius*, *P. hillii* or *P. strictifolius*. As noted by the manufacturer and as confirmed by the results of other ProcellaCOR treatments, the Potamogeton genus is impacted by the herbicide.

- While *Myriophyllum alterniflorum* is listed as protected in the applicant's swim-over document, other protected species are identified but are neglected and should be highlighted as protected by NYS: *Isoetes lacustris*, *Bidens beckii* (listed as *Megalodonta beckii* in LGPC document) and *Myriophyllum alterniflorum.* In addition, the survey areas are not shallow enough to adequately determine growth of *Subularia aquatica* or the extent of growth of other shallow-nature, NY Natural Heritage protected macrophytes. Considering the questionable timeframe and credibility of the 2022 supplemental survey, the shallow areas remain improperly surveyed.

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

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- With the questionable survey techniques and methodology between 2021 and 2022, the distribution of rare and protected species by NY Natural Heritage is unconfirmed and requires additional, legitimate investigation.

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

- The APA's SIR for this subject matter also requires information within 0.3 mi. from a treatment area, yet the outskirts of each of these proposed test bays were sampled primarily at deep locations, thereby omitting shallow vegetation growth that needs to be included in the application.

- The 2021 Report accompanying each proposed test bay states: "areas of the wave break zone within depths of 1-4 ft. mostly consisted of bottom sediments of sand with little organic materials; areas within the 0.3 mile radius of the proposed treatment areas were lacking in aquatic macrophytes due to benthic bedrock or steep drop offs not conducive...for plant growth." This is misleading as it makes the bay sound barren, when the prospective bay surveys show the complete opposite – namely, abundant vegetation and diversity.

- Considering the diversity of macrophytes in Lake George, multiple rake tosses should have been completed at each sample site for the use of the PIM, or a snorkel/dive transect survey should have been included to capture the high diversity of species (not captured by a single rake toss) identified in Ogden's 1976 Field Guide to Aquatic Plants of Lake George.[5]

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

6. The Project Applications are incomplete as they fail to provide any information or assessment of the in-lake biological community of invertebrates, macroinvertebrates and fish to determine potential impacts of the aquatic herbicide treatment.

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

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These investigations should take the form of surveys that will determine species composition, population, occurrence and distribution and should be performed prior to any herbicide application. These surveys should include a description of the method of survey, the determination of survey points, the method for inventory, and the qualifications of personnel. The investigation should also include the post application sampling times in relation to the herbicide application as well as observation and documentation of in water column biology.

In conclusion, the application fails to provide the information necessary to meet either agency requirements for completeness or to allow the agencies to make informed decisions. In our opinion, since this is proposed by the applicant as the first ever experimental application of a chemical herbicide in Lake George, it is necessary to collect all of the information identified in this letter to determine all possible impacts to the vital resources of Lake George before consideration of this experiment moves forward.

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

Sincerely,

Christopher Navitsky, PE
Lake George Waterkeeper

Eric Siy, President
The Lake George Association

cc: all by electronic mailing
John Ernst – Chairman Adirondack Park Agency and Board members
Dave Wick - Executive Director LGPC
Barbara Rice – Executive Director APA
Joseph Zalewski – Regional Director, NYSDEC Region 5
Thomas West, Esq.

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

- The APA's SIR for this subject matter also requires information within 0.3 mi. from a treatment area, yet the outskirts of each of these proposed test bays were sampled primarily at deep locations, thereby omitting shallow vegetation growth that needs to be included in the application.

- The 2021 Report accompanying each proposed test bay states: "areas of the wave break zone within depths of 1-4 ft. mostly consisted of bottom sediments of sand with little organic materials; areas within the 0.3 mile radius of the proposed treatment areas were lacking in aquatic macrophytes due to benthic bedrock or steep drop offs not conducive...for plant growth." This is misleading as it makes the bay sound barren, when the prospective bay surveys show the complete opposite – namely, abundant vegetation and diversity.

- Considering the diversity of macrophytes in Lake George, multiple rake tosses should have been completed at each sample site for the use of the PIM, or a snorkel/dive transect survey should have been included to capture the high diversity of species (not captured by a single rake toss) identified in Ogden's 1976 Field Guide to Aquatic Plants of Lake George.[5]

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

6. The Project Applications are incomplete as they fail to provide any information or assessment of the in-lake biological community of invertebrates, macroinvertebrates and fish to determine potential impacts of the aquatic herbicide treatment.

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

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These investigations should take the form of surveys that will determine species composition, population, occurrence and distribution and should be performed prior to any herbicide application. These surveys should include a description of the method of survey, the determination of survey points, the method for inventory, and the qualifications of personnel. The investigation should also include the post application sampling times in relation to the herbicide application as well as observation and documentation of in water column biology.

In conclusion, the application fails to provide the information necessary to meet either agency requirements for completeness or to allow the agencies to make informed decisions. In our opinion, since this is proposed by the applicant as the first ever experimental application of a chemical herbicide in Lake George, it is necessary to collect all of the information identified in this letter to determine all possible impacts to the vital resources of Lake George before consideration of this experiment moves forward.

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

Sincerely,

Christopher Navitsky, PE
Lake George Waterkeeper

Eric Siy, President
The Lake George Association

cc: all by electronic mailing
John Ernst – Chairman Adirondack Park Agency and Board members
Dave Wick - Executive Director LGPC
Barbara Rice – Executive Director APA
Joseph Zalewski – Regional Director, NYSDEC Region 5
Thomas West, Esq.

LGA Lake George Association

Lake George Association

May 30, 2024

Mr. Aaron Zeimann, Associate Adirondack Park Project Analyst Forest Resources
Adirondack Park Agency
1133 State Route 86
Ray Brook, NY 12977

RE: Lake George Park Commission Application for ProcellaCOR
Sheep Meadow Bay, Hague (T) (APA Proj No. 2023-0017)
Blairs Bay, Hague (T) (APA Proj No. 2023-0018)

Dear Mr. Ziemann:

The Lake George Association (LGA) continues to have significant environmental and ecological concerns regarding the proposal by the Lake George Park Commission (LGPC) to apply the aquatic herbicide ProcellaCOR EC to control the invasive plant Eurasian watermilfoil in the two bays identified above in Lake George.

On May 28, 2024, Peter Menzies of the LGA submitted a letter to Ken Parker, LGPC Chair, proposing an alternative to the use of ProcellaCOR in Lake George. It is attached for your record.

The offer states the LGA will pay for diver-assisted suction harvesting of milfoil in the two bays proposed for chemical treatment as well as assist in development of a long-term aquatic species management plan, which would determine the safest, most effective, most environmentally responsible management for Eurasian watermilfoil and other aquatic invasives.

This offer is clearly an alternative to the proposed regulated activity and, under the Freshwater Wetlands Act and pertinent APA regulations, must be considered because it would avoid degradation of, and adverse impact to, the wetlands. We respectfully submit that under the circumstances the APA Board cannot justify departure from the avoidance requirements of the wetlands regulations applicable to these projects.

This objection is in addition to the technical comments submitted by the LGA and the Lake George Waterkeeper.

Respectfully,

Dr. John Kelly, III
Lake George Association Board Chair

cc: all by electronic mailing
Dave Wick, Executive Director LGPC
Joseph Zalewski – Regional Director, NYSDEC Region 5
Thomas West, Esq.

From: Steve Ramant
To: APA Regulatory Programs Comments
Subject: LGPC & ProcellaCOR
Date: Wednesday, May 29, 2024 4:51:06 PM

Afternoon,

One has to question why Lake George Park Commission & APA would allow to put a chemical toxic, ProcellaCOR, into Lake George. Part of it's composition is PFAS & is a know CANCER causing ingredient. Please note that Minnesota Department of Agricultural has recognized this CANCER causing ingredient in ProcellaCOR.

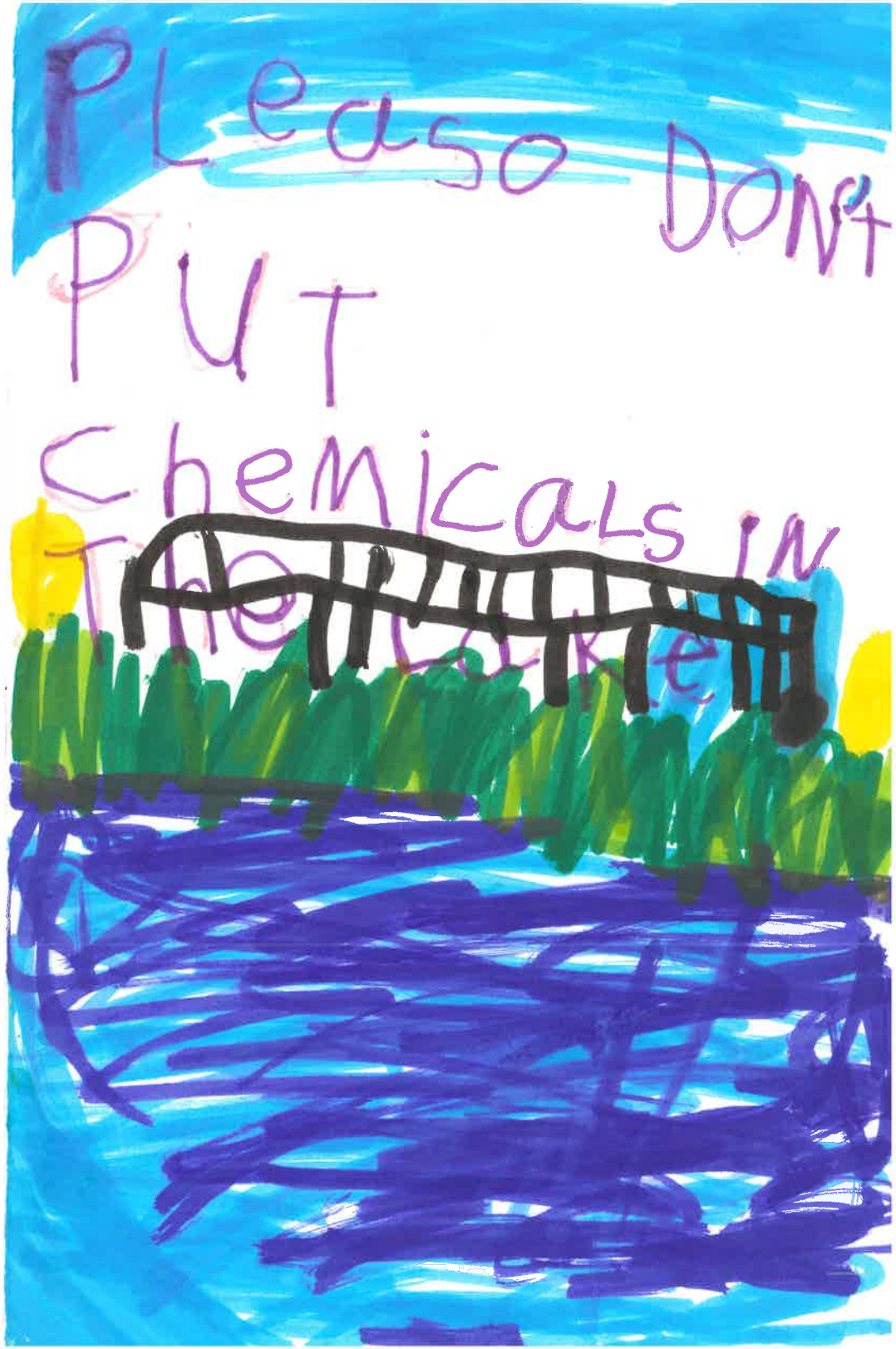
I hope you know that the Lake George Association, the Town's of Hague, Ticonderoga & Dresden took action in court against this. Also over 4800 signatures of Lake George folks were all against ProcellaCOR being out into The Queen if Anerican Lakes. We're aware of recent Court ruling & I'm sure we'll all move forward again AGAINST this CANCER ingredient going into Lake George. Hope you also read today's New York Times newspaper. The facts are there!

PLEASE RULE AGAINST THIS TOXIC INTO LAKE GEORGE.

Thank you,
Steve & Kathi Ramant
Hague, NY

Sent from my Galaxy

RECEIVED
ADIRONDACK PARK AGENCY
MAY 20 2024



To: Adirondack Park Agency,

I go to Lake George every summer. I think the water is clean and I want it to stay like that. I don't want to swim in it if there are chemicals applied to the water. My favorite thing to do there is swim. Thank you for reading my letter

from Maggie

I am 6 years old

From:	Chris Navitsky
To:	Ziemann, Aaron C (APA)
Cc:	twest@westfirmlaw.com; jekelly3rd@gmail.com; Leigh Youngblood; dave@lgpc.state.ny.us; Zalewski, Joseph M (DEC)
Subject:	Lake George Park Commission ProcellaCOR Permit Applications 2023-0017 & 2023-0018
Date:	Thursday, May 30, 2024 3:49:35 PM
Attachments:	Outlook-rio4r1ns.png APA_Waterkeeper.LGA Objections_FINAL_053024.pdf

Good afternoon Aaron -

Hope that all is well with you.

Please find attached the technical comments and science-based concerns submitted by the Lake George Association and Lake George Waterkeeper for the two above referenced permit applications for your review.

This document should be placed in the record public comments for both applications - 2023-0017 and 2023-0018.

I understand these comments are detailed and extensive. If there are any questions or confusion regarding the detail provided, please do not hesitate to contact me. I and my colleagues would be glad to meet with you regarding any of the subject matter contained in the technical comments.

Please verify receipt as we have experienced problems in the past regarding submitted comments.

Thank you for your attention. Have a great day!

Best regards -

Chris

Chris Navitsky, P.E.
Lake George Waterkeeper
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May 30, 2024

Mr. Aaron Ziemann, Associate Adirondack Park Project Analyst Forest Resources
Adirondack Park Agency
1133 State Route 86
Ray Brook, NY 12977

RE: Lake George Park Commission Application for ProcellaCOR
Technical Comments Science-Based Concerns
Sheep Meadow Bay, Hague (T) (APA Proj No. 2023-0017)
Blairs Bay, Hague (T) (APA Proj No. 2023-0018)

Dear Mr. Ziemann:

The Lake George Association ("LGA") and the Lake George Waterkeeper ("Waterkeeper") continue to have significant environmental and ecological concerns regarding the proposal by the Lake George Park Commission ("LGPC" or "the Applicant") to apply the aquatic herbicide ProcellaCOR™ EC ("ProcellaCOR") to control the invasive plant Eurasian watermilfoil in the two bays identified above. We believe that the issues of our concerns constitute violations of the Adirondack Park Agency Act regarding failure to comply with the protection of freshwater wetlands.

Executive Summary

This letter highlights key science-based concerns and the known and unknown risks of using ProcellaCOR in Lake George as well as new science that has yet to be acknowledged and/or reviewed by the Applicant, Adirondack Park Agency ("APA"), or New York State Department of Environmental Conservation ("Department"). The main points in contained in this letter are:

- **We remain concerned that there has been misrepresentation to the APA Board regarding previous approved permit applications and the strength of industry science;**
- **Peer-reviewed science on Lake George has demonstrated significant water exchange and transport showing that the lake is not slow moving and quiescent;**
- **These real world, in-lake hydrodynamic situations of water exchange and transport, which have been recognized in published studies, will affect any pesticide treatment, including its effectiveness and potential for unintended stimulation of plant growth among other potential impacts from the active ingredient and its degradants;**
- **The permit application fails to meet the requirements of the Freshwater Wetlands Act since there is a failure to establish a need for a regulated activity, chemical treatment, in jurisdiction wetlands and reasonable alternatives exist;**

LGA Lake George Association

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- **The recent determination by the Minnesota Department of Agriculture that the active ingredient in ProcellaCOR is a PFAS chemical is alarming and warrants immediate cessation of ProcellaCOR treatments: and,**
- **Lake George and the treatment bays are not in crisis and the overwhelming majority of riparian and property owners as well as all North Basin municipalities oppose the use of ProcellaCOR in Lake George.**

Introduction

Based upon the science that we have performed and reviewed, we believe that the state agencies have been presented with data that is misleading and incomplete and advanced primarily by industry representatives and proponents. Further, the risks associated with ProcellaCOR as outlined in the EPA docket appear to have been ignored or downplayed.

Moreover, attempts to equate Lake George with other ProcellaCOR treated lakes are inappropriate given the substantial differences in water quality, ecology, and dynamics in those lakes; these examples are in no way indicative of what could happen upon the first ever permitted introduction of this synthetic plant hormone into Lake George. Lake George is different in many aspects – depth, ecologically complex, oligotrophic, and a lake that is used by thousands as a drinking water supply. Lake George has a AA-Special designation, higher than Lake Luzerne (B), Minerva Lake (B), Caroga Lake (B) and Horseshoe Pond (C), other Adirondack lakes that have received APA permits for ProcellaCOR treatments.

We further note the economic and reputational significance of a first-time ever permitted introduction of an aquatic pesticide in Lake George poses significant social risks. ProcellaCOR use permits in other Adirondack lakes were supported by a majority of residents, lake associations and/or adjoining municipalities. **However,** the over-whelming majority of riparian and property owners as well as visitors object to the use of ProcellaCOR in Lake George. In addition, the four towns, Towns of Hague, Dresden, Putnam and Ticonderoga, within, adjacent to, and downstream of the proposed treatment bays oppose the use of ProcellaCOR.

Lastly, Eurasian watermilfoil is not at a crisis stage in Lake George and does not necessitate such a drastic shift in management method to be implemented. Milfoil has been controlled through hand harvesting for over 30 years. The LGA knows this as they have invested over $1.4 million over the past 10 years. This has even been recognized by the LGPC Executive Director Dave Wick, “[Wick] acknowledged that the lake is not in a crisis over milfoil, a point the LGA has cited as a reason to shelve the herbicide plan.”[1] Further, APA presentation documents confirm that these two sites have not undergone any milfoil management for seven and nine years. Despite this, the milfoil beds remain limited in size and density, covering significantly less than the requested four-acre treatment areas. There is no ecological or economic problem to be addressed here.

[1] Adirondack Explorer. March 5, 2024.

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Corrections to Statements in the Record

It is our opinion that there has been misleading information contained in the Agency's permit review record that should be corrected before a decision on these referenced permits for Lake George as noted:

A. In April 2022 during the first permit review, APA staff described Lake George as "suitable" for a drinking water supply. However, staff failed to tell the Agency Board that Lake George is a drinking water supply and that riparian owners in Blairs Bay and Jelliffe-Knight Bay (previously referred to as Sheep Meadow Bay) have their water intakes directly in or adjacent to the proposed treatment areas.
B. At the March 13, 2024 Agency meeting regarding the Brant Lake Association permit application, the record states there are limited non-target impacts and that "The herbicide is very select as only a few plants uptake." However, on the issue of selectivity of ProcellaCOR, the United States Environmental Protection Agency ("EPA") said, "Due to a lack of comparative information about superior selectivity to native plant species, the agency cannot conclude that this is a benefit of registration."[2] In other words, EPA said the manufacturer's claim of superior selectivity was unsubstantiated.
C. Again, at the March 13, 2024 meeting, Slide 30 of the record regarding the half-life of ProcellaCOR EC only recognizes the aquatic half-life for photolysis, degradation via light (4 to 6 days) and states that the "herbicide will not stick around." This statement and the presentation fail to recognize the fact that the half-life ("stability in water") of ProcellaCOR is 111 days for hydrolysis, according to the Materials Safety Data Sheet[3] or that the degradants remain for a much longer period exhibiting the same toxic qualities.
D. At the March 13, 2024 meeting, Slide 30 of the record showed ecological toxicity data and states "DEC supports these findings, acute toxicity is low and no observed effects to species. DEC recognizes the potential impacts to benthic invertebrates species but cite MA study that states that for levels to reach chronic toxicity levels in sediments, the dosage in water column needs to be 232 ppb." According to the EPA Environmental Fate and Risk Assessment, it was determined "[t]his study does not fulfill a current U.S.E.P.A. data requirement..." It further states "[d]ata from both the Pore Water and Sediment segments of this study produced endpoints (both NOAEC and LOAEC) which were less than the EEC. Furthermore, knowing that the study was conducted with spiked-water, not spiked-sediment, this study is classified as supplemental (quantitative) with respect to the use of both florpyrauxifen-benzyl and the XDE-848 acid compounds."[4] In summary, the chronic

[2] United States Environmental Protection Agency. Memorandum Re: Review of Benefits of the Registration of Florpyrauxifen-benzyl in Aquatic Use Sites. Prepared by Caleb Hawkins, M.S. Biologist, Biological Analysis Branch. Dated June 16, 2017.
[3] ProcellaCOR EC Safety Data Sheet. SePRO Corporation 11550 North Meridian Street Suite 600 Carmel, IN 46032. 10/09/2017
[4] *Environmental Fate and Ecological Effects Risk Assessment for the Registration of the New Herbicide for the Use on Rice and Aquatics Florpyrauxifen-benzyl*. Prepared by United Stated Environmental Protection Agency Office of

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toxicity to invertebrates remains a concern since the cited MA study was determined by EPA to be supplemental and does not meet EPA data requirement/protocol.

E. At the March 13, 2024 meeting, the Minerva Lake 4-year change in common species abundance from 2019-2022 (Slide 33), which labels a decrease from 38% to 24% in Macro-algae (Chara/Nitella spp.) as "Negligible," while other species decreases of the same amounts were cited as "Decreases." This was concerning since Nitella is a macro-alga of significant importance in lakes such as Lake George as it sequesters phosphorus, and this species was specifically cited in previous public comments by this organization. It is our opinion that this classification fails to recognize the importance of such a decrease in this species, especially in an oligotrophic lake such as Lake George.

F. At the March 13, 2024 meeting, Slide 41 discussed the "Treatment Plan" and states it was determined that the thermocline, with the cold, dense water at the bottom by the sediments and the warmer water on top, the herbicide will not mix with the benthic sediments. This statement is not supported by any study and is contradicted by actual in-lake monitoring in Lake George that shows vertical movement through the thermocline by zooplankton from the lake bed to the lake surface. Therefore, the pesticide will be able to be in contact with the lake benthic sediments, raising concern for potential impacts to benthic macroinvertebrates.

G. At the March 2024 meeting, Slide 50 of the record was addressing "Comments – Not Supported" regarding objections of off-label use of the pesticide in waters that were not slow-moving and quiescent. The slide states DEC determined that the use is appropriate with the label and "the proposed use is consistent with the label and the definition of slow-moving and quiescent waters." To our knowledge, NYSDEC as well as EPA have nothing in regulations or policy regarding a quantitative or descriptive definition of slow-moving/quiescent that we could locate or determine. In fact, Brian A. Primeau, Pesticide Control Specialist, NYSDEC Division of Materials Management, Bureau of Pesticide Management (BPM) Region 5 stated in an affidavit, "I am not aware of any Federal or State pesticide regulatory standard, industry standard, or quantitative value for "slow-moving/quiescent" or "little … outflow." These terms do not have regulatory definitions and are subject to my professional judgement."[5] Since this is going to be an issue of professional judgement, it is very important for the APA to review the information that has been collected regarding water flow and exchange in the treatment areas. (See Comment 4 below).

H. At the March 13, 2024 meeting, an unidentified woman from the audience (speaker was referred to as "Liz" and apparently a representative for the applicant) addressed the Board regarding a discussion of studies on macroinvertebrates and stated there was a scientific peer-reviewed study in Florida that determined there was "no toxic impacts to mussels." Although the speaker did not identify herself or cite the study, the only study we are aware of regarding freshwater mussels sensitivity to florpyrauxifen-benzyl states the following: "Our results show that the herbicide formulations and compounds tested were not acutely

Pesticides Program Environmental Fates and Effects Division Environmental Risk Branch V 1200 Pennsylvania Ave., NW Washington, DC 20460. April 11, 2017.

[5] Affidavit of Brian A. Primeau. Sworn on May 25, 2022. Warren County Supreme Court Index No. EF2022-70178.

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toxic to juveniles of these two species of freshwater mussels, indicating minimal risk of short-term exposure from florpyrauxifen-benzyl applications in the environmental for aquatic weed control. However, potential chronic or sublethal effects remain uncharacterized and warrant additional investigation."[6]

General Concerns

One of the major concerns regarding the proposed use of this pesticide is that the APA must require full compliance with the State Environmental Quality Review Act (SEQRA) before any permits are issued. Our organization raised the following comment to the New York State Department of Environmental Conservation ("Department') that the Department should require full compliance with SEQRA before it renders any decisions concerning the pending applications involving ProcellaCOR. Department Policy DSHM-PES-05-05, Section V (B) Paragraph 11 confirms that the issuance of aquatic herbicide permits by the Department is an action requiring compliance with SEQRA. The only exceptions that are noted are contained in Section 11 (1 & 2) "[i]n the case where a pesticide not listed in Parts 327, 328 or 329, or where a pesticide not evaluated in the 1981 EIS, 1995 SEIS or PEIS, is proposed for use, the applicant must take further steps to comply with SEQRA. An Environmental Assessment Form (EAF) must be prepared by the applicant and attached to the application." ProcellaCOR is not listed in 6NYCRR Part 327 and was not evaluated in any of the EIS documents referenced in the guidance document.[7] Accordingly, before the pending permit applications may be processed further, the Applicant and APA must comply with the full requirements of SEQRA regarding the environmental review of the pesticide. The Department has yet to respond to or acknowledge this comment raised and SEQRA must be complied with before any further use of this pesticide is permitted.

The APA should also be aware of the significant number of riparian owner objections that have been filed with the Department, 16 in total, including the Towns of Dresden and Putnam. Although these are filed regarding another agency's permit, they document significant and substantive concerns that remain unrecognized and unacknowledged regarding the use of this pesticide. More importantly, these objections indicate the infringement of the riparian owners' property and constitutional rights by owners who overwhelmingly object to this impairment of their rights. The significance of this issue is underscored by the local government opposition to these projects.

We understand the importance of invasive species management as we have been partners with the LGPC for over 35 years working to control Eurasian watermilfoil and we have spent over $1.4

[6] Buczek, Sean, Archambault, J., Cope, W.G., and Heilman, M. 2020. *Evaluation of Juvenile Freshwater Mussel Sensitivity to Multiple Forms of Florpyrauxifen-benzyl*. Bulletin of Environmental Contamination and Toxicology Volume 105, pages 588-594.

[7] 6 NYCRR Section 327.7 includes the following language: "In addition to the authorized chemicals and specifications, permits may be issued for other chemicals and specifications, without the necessity of adding them to the list, when it is evident that their use will conform with the intent and purpose of the law and these regulations." ProcellaCOR has never been identified as such a chemical and to do so on an ad hoc basis in response to these permit applications would violate SEQRA. Unlike the chemicals that are actually listed and those that were reviewed under prior SEQRA analyses, ProcellaCOR has never been evaluated under SEQRA.

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million since 2013 on this effort. However, these permit applications seek to introduce a radical and high-risk change in the current management approach, thereby setting a dangerous precedent for the future ecology of Lake George and possibly many other high-quality and uniquely regulated waterbodies in the Adirondacks.

Consequently, the LGA and the Waterkeeper object to the proposed use of ProcellaCOR, be it for testing purposes or otherwise, or any other aquatic herbicides in Lake George. This objection is shared by the Towns of Hague, Dresden, Ticonderoga, and Putnam, supported by over 300 public comments in opposition sent to the APA in April 2022 and over 5,000 concerned citizens who have signed an on-line petition in opposition.

We have attached our public comment letter on the LGPC permit application deficiencies and technical concerns submitted to the Department on February 16, 2024, which documented the many potential negative short- and long-term impacts and uncertainties surrounding these applications for herbicide use as well as failure to comply with application requirements.

Itemized Application Issues

The following are issues regarding the proposed use of ProcellaCOR by the LGPC that should be considered as substantive and significant and require an adjudicatory hearing. Many of these comments are based on the latest field research, from real-world lake studies, providing actual results from field use. From this new information along with previous concerns, there are clear, documented risks, ecological impacts, data gaps and concerns with the use of ProcellaCOR in a large oligotrophic lake like Lake George.

1. **There has not been any demonstrated ecological and/or economic impact and/or water use/recreational impairment to Lake George that creates the need for drastic management change calling for the use of herbicides.** The LGPC has characterized the Eurasian watermilfoil in Lake George in the following manner to justify the extreme proposed management change: "Eurasian watermilfoil is an aggressive invasive plant that wreaks havoc in thousands of water bodies throughout the US, including Lake George, choking off entire bays, causing problems with swimming, boating and fishing."[8] It is recognized that Eurasian watermilfoil is present in the two bays, but the overall condition is not categorized as dense. The Lake George Association performed site surveys in September 2023. In Blairs Bay, conditions are not "dominated by *Myriophyllum spicatum*" as reported by the applicant. Their biased survey methodology coupled with the assumption that the majority of the bay was unsuitable for macrophyte growth, led to a misleading understanding and reporting of the vegetation in Blairs Bay. The bay was 90% to 100% covered with macrophyte growth. Eurasian watermilfoil, although present, is not likely to reach the surface or even near the surface of the water. In Sheep Meadow

[8] Lake George Park Commission OpEd. "*Lake George Park Commission putting science first*". The Daily Gazette. April 2, 2023.

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Bay, conditions are not "dominated by *Myriophyllum spicatum* with pockets of native macrophytes" as reported by the LGPC, and instead consist primarily of native species with a sizable dense bed of vegetation dominated by Eurasian watermilfoil located offshore. However, the milfoil bed does not reach the surface of the water. According to the LGPC, "the areas within the 0.3-mile radius of the proposed treatment area were lacking macrophytes due to benthic bedrock or steep drop-offs," whereas the LGA survey shows otherwise. While the dropoff and depths did occur, vegetation is abundant, including a large Quilwort bed (361 plants/quadrat). Getting the correct facts before the decision-makers concerning this important issue is a prime example of a substantive and significant issue that needs to be adjudicated.

2. **The applicant has failed to establish the need for deviation from the Freshwater Wetlands Act to issue a permit for a regulated activity, chemical use of a pesticide, in APA jurisdictional wetlands.** Blairs Bay has a value rating of 1, i.e. the highest rating in terms of ecological value and findings require that the proposed activity "(i) would be compatible with preservation of the entire wetland; and (ii) would not result in degradation or loss of any part of the wetland or its associated values." There is no establishment for the need of chemical treatment – that is, there is no site-specific information showing that recreation, property values or the wetland function in the target area is negatively impacted by Eurasian watermilfoil. After seven years of no management, according to the Applicant's survey, only 4 of 38 sample sites had dense growth and 4 sites had moderate growth. The LGA survey detailed its findings in the previous item. APA staff has acknowledged that there are native watermilfoils, including the threatened alternate-flowered watermilfoil, and the rare native quillwort *Isotes lacustris*, that could be sensitive the treatment meaning that the permit and project would not be compatible with preservation of the entire wetland. Additionally, as documented on page 2 of this letter, LGPC Executive Director Dave Wick acknowledged that there is no milfoil crisis in Lake George.

   Sheep Meadow Bay (Jelliffe-Knight Bay) wetland has a value rating of 3 and findings for the proposed regulated activity must demonstrate: (i) would result in the minimum possible degradation or destruction of any part of the wetland or its associated values; (ii) is the only alternative which reasonably can accomplish the applicant's objective; and (iii) would, weighing the benefits of the activity against the cost and the wetland values lost, provide a net social and/or economic gain to the community." The use of ProcellaCOR is not the only alternative that can accomplish the Applicant's objective. The use of diver assisted suction harvesting ("DASH") has never been used in Sheep Meadow Bay, which is the method used successfully to manage EWM in Lake George.

   Additionally, the recent offer from the LGA to the LGPC to pay for the DASH for both bays must be considered as a viable alternative to the proposed regulated activity that will have impacts and degrade the wetlands, its flora and fauna. There is simply no way that the

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APA can make the findings required under these regulatory requirements in the face of the LGA proposal to pay for the treatment of these bays with non-chemical means.

3. **The applicant and State agencies have overstated the strength and independence of the science supporting the use of ProcellaCOR.** The EPA met its statutory obligations under FIFRA when it reviewed and registered the active ingredient in ProcellaCOR in 2017. EPA received and considered 364 studies, beginning in September 2015, and subsequently registered ProcellaCOR on September 8, 2017. The LGPC staff characterized the science record as saying "I'm also here to tell you that after studying the hundreds of peer reviewed research articles on ProcellaCOR …" By using the terms "peer reviewed research" and "articles," the LGPC intended to portray the science as if it had been published and had undergone independent scrutiny. The industry-submitted science was sufficient for EPA registration but not nearly as robust as claimed by the LGPC. According to a Freedom of Information Act request filed by the Lake George Waterkeeper on January 31, 2024, and a subsequent meeting with EPA staff on March 16, 2024, it was recognized that 95% of the 364 studies submitted to the EPA are unpublished industry studies performed in small vessels under very controlled laboratory conditions. 133 (37%) of the studies are unpublished studies prepared by Dow Chemical Company (or Corteva) and 231 (63%) are unpublished studies prepared by other companies for Dow Chemical. Moreover, the EPA does not perform independent testing for the registration of pesticides, including ProcellaCOR. It should also be noted that the New York State Department of Environmental Protection registered ProcellaCOR while not performing any independent testing that we are aware of.

4. **There will be substantial water movement, exchange, and transport in the bays where treatment is proposed that demonstrates that the label requirement for slow-moving and quiescent waters within little or no outflow is not met.** Based on new information from The Jefferson Project through research performed and data collected over the past two years, including a peer-reviewed paper, the LGA/Waterkeeper conclude that there is significant water flow and transport in the bays, both horizontally and vertically, and that the dilution of the pesticide will not be uniform in the water column. This is demonstrated by detailed and peer-reviewed computer circulation models by The Jefferson Project that have been verified by physical measurements. This information has not been recognized by the Applicant or state agencies. The methodology was performed through validated hydrodynamic simulation models of Lake George through data collected through vertical profilers and an Acoustic Doppler Current Profiler ("ADCP").[9] The four figures at the end of the letter and following discussion will explain how the water movement, exchange and transport occur in Blairs Bay and that there are not slow-moving and quiescent conditions with little or no outflow in the proposed treatment bays.

[9] Auger, Guillaume, Kelly, M., Moriarty, V., Rose, K., and Kolar, H. 2024. Understanding lake residence time across spatial and temporal scales: A modeling study of Lake George, New York, USA. *Water Resources Research, 60,* e2022WR034168.

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FIGURE 1: This is a figure (Blairs Bay Treatment Area and Dilution Zone) included in the LGPC permit application that shows the proposed treatment area and dilution zone in Blairs Bay. This issue should be adjudicated before any permits are issued for the application of chemicals to Lake George. This dilution zone referenced by the Applicant is based on the Department approved "Aquatic Pesticide Downstream Modeling spreadsheet." "The spreadsheet is used to estimate the concentration of a pesticide's active ingredient in a specified area of a lake (i.e. a dilution zone) when the following information is known: volume of pesticide to be added; ration of pesticide active ingredient; total area of the dilution zone; and the average depth of the dilution zone."[10] It should be noted that this is not a model but a simple arithmetic spreadsheet calculation of the volume of water required to achieve a specific concentration stated to be non-detectable. This calculation assumes uniform dilution at an unknown rate determined in an arbitrary shape that is assumed to be enclosed and has no water exchange/outflow with the rest of the lake. Therefore, these calculations and the supposed dilution zone are not based on real-world, in-lake situations and fail to account for water currents, winds, temperature, and circulation.

FIGURE 2: This figure shows the expected water movements overlaid on the Blairs Bay Treatment Area and Dilution Zone. The water currents were determined with a downward-looking 600 kHz Workhorse Acoustic Doppler Current Profiler (ADCP) mounted on a platform of a vertical profiler. The ADCP measurements were made in Blairs Bay with the model outputs. The data showed that simulated surface currents were consistent with observations at the time, with consistent directions and an overestimation of 0.03 m/s.[11] It is to be noted these data were collected on a day of calm conditions with little wind and indicate water movement influenced by stream flow from Sucker Brook, creating an outflow condition. Blue lines indicate the estimated travel time for the pesticide per hour based on the expected water movement based on measured in-lake velocities of 0.03 m/s~350 ft/hr. As shown, it can be expected that the pesticide is likely to travel outside the supposed dilution zone within 3 hours. This is concerning for several reasons. First, established contact exposure time (CET) requirements for florpyrauxifen-benzyl range from 12-24 hours.[12] Second, the travel time is less than the half-life period of 2-4 days so it will persist outside the area of milfoil treatment. Lastly, the pesticide will move into the deeper waters of the lake, where the pesticide will remain a much longer time due to degradation by hydrolysis (111 days).[13]

[10] Affidavit of Brian A. Primeau. Sworn on May 25, 2022. Warren County Supreme Court Index No. EF2022-70178.

[11] Auger, Guillaume, Kelly, M., Moriarty, V., Rose, K., and Kolar, H. 2024. Understanding lake residence time across spatial and temporal scales: A modeling study of Lake George, New York, USA. *Water Resources Research, 60,* e2022WR034168.

[12] Wisconsin Department of Natural Resources Florpyrauxifen-benzyl Chemical Fact Sheet. EGAD #3200-2018-83. Wisconsin Department of Natural Resources Box 7921 Madison, WI 53707-7921. July 2018.

[13] ProcellaCOR EC Safety Data Sheet. SePRO Corporation 11550 North Meridian Street Suite 600 Carmel, IN 46032. 10/09/2017

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FIGURE 3: This figure shows a second scenario and the expected water movements overlaid on the Blairs Bay Treatment Area and Dilution Zone. This scenario considers wind-induced velocities along with the measured stream flow. These data were collected in the means as detailed for the previous figure and show in-lake velocities of 0.03 m/s~350 ft/hr in the northern part of the bay and 0.050 m/s~590 ft/hr in the southern part of the bay where the winds create a clockwise current. Again, the blue lines indicate the estimated travel time for the pesticide per hour. It can be expected that the pesticide can travel outside the supposed dilution zone more rapidly - in less than 2 hours. As previously stated, this is of concern because it is less than the required CET of 12-24 hours, less than the half-life of 2-4 days, and moving into the deeper waters of the lake.

FIGURE 4: This figure is a cross section of Blairs Bay displaying the circulation and Sucker Brook stream intrusion inflow from the data presented on the graphs showing in-water velocity at varying depths collected by an ADCP. The two graphs depict velocities – upper graph is north/south and the lower is east/west with red indicating positive velocity (north or east) and green indicating negative (south or west). As demonstrated in the graphs, water in the water column is flowing in different directions at different depths. As shown in the figure, there are significant horizontal water currents with the near surface water having a southeasterly flow, the Sucker Brook stream intrusion has a westward flow, and the mid-column has a northeasterly flow. This demonstrates that the bay is not slow-moving and quiescent but has water flowing at different velocities in different directions. The measured water velocities show that Sucker Brook enters Blairs Bay and flows into the lake's thermal stratification within a narrow depth range (where the temperature is equal), i.e. stream inflow does not mix through the entire water column but finds the equivalent temperature gradient in the lake's water column. From there the stream intrusion flows towards the main lake as a concentrated layer within the column, in this example of 0.03 m/s. Data is available for Sucker Brook that shows the average daily inflow of tens of thousands of gallons an hour of inflow into Blairs Bay which means the proposed 60-acre dilution zone must have net outflow equal to the inflow of Sucker Brook. **Therefore, based on the figures and data presented, the bays where the treatment is proposed are not slow-moving and quiescent, exhibit conditions where there is continuous outflow and water exchange, and, therefore, the proposed use is not consistent with the ProcellaCOR label.**

5. **Based on new information from The Jefferson Project, from research performed and data collected over the past year, including a peer-reviewed paper, the LGA/Waterkeeper conclude that the hydrodynamics and water transport in the lake is both dependent on and independent of weather conditions. The independent movement of the water is based on internal seiche waves, thermal influences and stream input and these dynamic forces even occur on calm days. These forces create circulation patterns that directly discharge water from the bays into deep waters in the lake.** It has now been proven that water moves in different directions and

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at different speeds, at different depths. In fact, large subsurface water velocities (where herbicide would be applied) have been measured even when the water surface is still. This data supports the fact Lake George is not slow-moving and quiescent and that this issue should be adjudicated before any permits are issued for the application of chemicals to Lake George.

6. **Evidence has been presented regarding wide-spread circulation and water exchange from the treatment area(s) that will reduce the contact and exposure time and subsequently the efficacy of the proposed treatment.** More recent research studies and data have become available since the initial permit application process that demonstrates a greater influence of lake hydrodynamics on water movement based on the bulk water exchange processes. Detailed and peer-reviewed computer circulation models by The Jefferson Project, verified by physical measurements, demonstrate that there are significant horizontal and vertical water currents in Lake George. The results of this report imply that in the two bays targeted for the ProcellaCOR experiment, the herbicide will quickly be swept out of the bays. Moreover**,** published studies have pointed to the importance of understanding hydrodynamic processes in the use of herbicides. "Hydrodynamic processes driven by gravity flow (rivers, streams, canals) tides (lunar), wind (lake seiches), and thermal circulation (lakes and reservoirs) impact bulk water exchange in submersed plant stands, alter herbicide concentration-exposure time (CET) relationships, and thus can play a major role in determining success or failure of a treatment"[14] (Emphasis added). "When a canal or other high-flow aquatic system is targeted for weed control, exposure time will probably be greatly reduced and beyond the control of the resource manager."[15]

   For example, a study of auxin aquatic herbicides in Fort Peck Lake, MT, demonstrated the challenges of high-water exchange rates and the impacts on herbicide efficacy. "Relatively small treatment plots of <4 ha (10 acres) can be impacted by water-exchange processes in open fetch areas of the lake (primarily wind-induced), thus decreasing herbicide contact time around target plants, and greatly reducing efficacy of EWM."[16] "The lake contains extended fetches of open water that, while in association with strong prevailing winds, can compromise aquatic herbicide CET relationships."[17]

   Another example was a United States Army Corps of Engineer study of ProcellaCOR in Roanoke Rapids Lake, N.C., where the herbicide was applied with rhodamine dye to evaluate hydraulic control and non-target species response. Dye and herbicide residue

[14] Getsinger, K.D. and Netherland, M.D. 2018. Use of herbicides in areas of high water exchange: Practical considerations. J. Aquat. Plant Manage. 56s: 2018.
[15] Gettys, Lyn A., Thayer, K.L., Heilman, M.A. and Van Goethem, E.M. 2021. Effect of florpyrauxifen-benzyl concentration – exposure time on hygrophila and rotala. J. Aquat. Plant Manage. 59: 2021.
[16] Podkowka, Rebecca L., Getsinger, K.D>, Skogerboe, J.G., Gilbert, P.L. and Pennington, T.G. 2019. Demstration and Evaluation of Eurasian Watermilfoil Control Using Aquatic Herbicides in Fort Peck Lake, MT. ERDC/EL TR-19-16.
[17] Ibid.

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data indicated rapid water exchange was occurring at each treatment site and herbicide concentrations were not sufficient to achieve adequate control. A key report conclusion indicates the difficulty of water exchange: "Although small-scale research trials have provided beneficial data concerning general efficacy and selectivity, few trials have documented how to effectively utilize this technology in the field."[18] **"**Aqueous herbicide levels in Plot 1 indicated rapid dissipation of herbicide out of the treatment site."[19] "Measured aqueous herbicide levels indicated a rapid movement of the applied herbicide out of treatment Plot 2."[20] As stated, rhodamine dye was used to track the herbicide movement – "Rhodamine WT dye data indicated high water exchange was occurring in small treatment plots (<1.2 ha)"[21] The following figures from the study demonstrate the high water exchange that was occurring in the treatment plots.

Figure 22. RWT dye and herbicide immediately after application (0 HAT) at Plot 2 Roanoke Rapids Lake, NC August 2020.

Figure 23. RWT dye and herbicide 1 hr after treatment at Plot 2 Roanoke Rapids Lake, NC August 2020.

[18] Sartain, Bradley T., Haug, E., Getsinger, K.,Sperry, B.P., Heilman, M., and Greer, M. 2023. Small Plot Applications of florpyrauxifen-benzyl (ProcellaCOR CS) for Control of Hydrilla in Roanoke Rapids Lake, NC. U.S. Army Corp of Engineer, ERDC Port, ERDC/EL TR-23-3.

[8] Ibid.

[20] Ibid.

[21] Ibid.

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Therefore, there is significant concern that is supported by research emerging from other lakes as well as the data collected on Lake George that lake hydraulics and water exchange rates are a large concern and will greatly impact any herbicide treatment in bays in Lake George. The applicant has failed to acknowledge this or take these natural processes into consideration in the proposed treatment. The issue of drift from the treatment zone was determined to be a substantive and significant issue in the previous APA proceeding concerning the proposed use of SONAR in Lake George, which was adjudicated that issue leading to permit denial. For the same reasons, this issue should be adjudicated before any permits are issued for the application of chemicals to Lake George.

7. **The previously detailed hydrodynamic processes associated with the lake will create bulk water exchange and dispersal of the auxin growth hormone in ProcellaCOR and will result in the potential of enhanced growth of milfoil in areas outside the treatment area.** Hormesis, or augmented growth following sublethal herbicide concentrations, is a characteristic of low-dose auxins, which will occur with the drift and dilution of the herbicide from the treatment area. This has been documented from in-lake studies referenced in the previous figures[22] as well as other studies. "Hormesis was noted in a previous study that documented a stimulated increase in yield for *E. densa* treated with the auxin herbicide, 2,4-D, applied at 1 to 11 mg ai L^{-1} (Peres et al 2016). Similarly, Mudge er al. (2021) suggested potential hormesis occurred for *E. canadensis* in a 6-wk CET study when exposed to florpyrauxifen-benzyl at 3, 6, and 9 ug ai L^{-1}. While macrophyte hormesis literature is limited for florpyrauxifen-benzyl, findings from these previous auxin herbicide screenings closely align with the observations of *E. canadensis* and *E. densa* response to treatment in the present study. Further, these data denote the perceptive effective dose thresholding, which can occur among auxin herbicides, and the varying sensitivity found even with the same plant family. Further research is required to specifically evaluate the lower florpyrauxifen-benzyl threshold concentrations and exposures that deter possible hormesis in common field applications scenarios; notably in high water-exchange situations."[23] (Emphasis added). The applicant has failed to acknowledge or mitigate the potential for impacts of bulk water exchange and the subsequent hormesis that could result in increased milfoil growth from the growth auxin in adjacent areas. This is yet another substantive and significant issue that should be adjudicated.

8. **The use of florpyrauxifen-benzyl (ProcellaCOR) is not consistent with its Pesticide Label, which is a violation of Federal Law.** The following is a portion of the initial wording on the introductory description of Florpyrauxifen-benzyl (ProcellaCOR) from the specimen label: "A selective systemic herbicide for management of freshwater aquatic

[22] Ibid.
[23] Howell, Andrew W. 2022. Evaluations of Florpyrauxifen-benzyl and Unoccupied Aerial Systems to Manage Invasive Aquatic Plants in North Carolina and New Zealand.

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vegetation in slow moving/quiescent waters with little or no continuous outflow …"[24] (Emphasis added). As documented in a recently published study by The Jefferson Project, Lake George bays have rapid bulk water exchange rates resulting in significant water currents and movement. This is the type of scientific data that decisions for the controversial first-time application of an aquatic herbicide to pristine water body must be based upon. Decisions should not be based upon unsubstantiated, data-lacking statements such as: "Despite the misrepresentations (that Lake George is not a quiet/quiescent water body), Lake George is in fact a lentic (still water) ecosystem. LGPC staff, as well as APA staff, have swam the demonstration sites many times and can attest that there is no appreciable current."[25]

The LGA is offering detailed quantitative data demonstrating the significant currents, both horizontal and vertical, as well as timing on the water exchange from small bays. This evidence is much stronger and can be validated much more easily than the unsupported claims of the applicant and administrator. Based on this data, Lake George cannot be considered a slow-moving/quiescent water body and the use of ProcellaCOR is in violation of the USEPA registration. Here again, this substantive and significant issue should be adjudicated with proof and cross examination.

9. **There are numerous unanswered questions surrounding the degradation of florpyrauxifen-benzyl; questions regarding half-life to metabolites to persistence in the environment.** It is widely reported that florpyrauxifen-benzyl will primarily degrade via aqueous photolysis with a reported half-life of 0.07-2 days. (USEPA 2017). However, with the high-water exchange present in Lake George, the pesticide will be transported quickly from the treatment area into deeper waters adjacent to the treatment site where degradation by photolysis will not occur. In these deeper waters, degradation will occur via hydrolysis, which is reported by SePRO to be 111 days. There is also concern that deeper, oligotrophic lakes such as Lake George will increase degradation time for auxin-mimic herbicides due to water exchange and transport, which is supported in studies – "The rate of herbicide degradation in this study was generally observed to be slower in oligotrophic seepage lakes."[26]

   It was stated by the applicant "Despite misrepresentation or misunderstanding of the product by the commenter (Waterkeeper), it is understood that the active ingredient will be absorbed by vegetation or break down in a matter of hours to days by photolysis."[27]

[24] Specimen Label for ProcellaCOR™ EC (EPA Reg No. 67690-80). Produced by SePro Corporation, 11550 North Meridian Street, Suite 600, Carmel, IN 46032. 2028.
[25] Personal correspondence from Dave Wick, Lake George Park Commission Executive Director, to Adirondack Park Agency Re: Response to Public Comments – ProcellaCOR. April 6, 2022.
[26] Nault, Michelle E. et al. 2018. Evaluation of large scale low concentration 2,4-D treatments for Eurasian and hybrid watermilfoil control across multiple Wisconsin lakes. Lake and Reservoir Management, Vol 34, No. 2 2018.
[27] Personal correspondence from Dave Wick, Lake George Park Commission Executive Director, to Adirondack Park Agency Re: Response to Public Comments – ProcellaCOR. April 6, 2022.

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However, that so-called understanding is not supported by recent studies where transport from the site occurs via advective actions and hydrodynamics has been documented, which needs to be considered. "Florpyrauxifen-benzyl transport beyond the treatment area showed that florpyrauxifen-benzyl did not remain localized to the treatment area, suggesting appropriate dosing measures and considerations of non-target impacts should be made for the whole lake."[28]

In the EPA Environmental Fate and Ecological Risk Assessment, the half-lives of the parent compound (florpyrauxifen-benzyl) were compared with the Total Toxic Residues (TTR), which is the parent compound plus the three degradates that were included as the residues of concern. So shown in the Assessment, the half-lives for the TTRs are considerably higher, particularly for the two aquatic metabolism studies. For aerobic aquatic metabolism, the parent was 4-6 days, but the TTR was 98-113 days and for anaerobic aquatic metabolism, the parent was 2 days and TTR was 965-16,700 days. Both the parent and XDE-848 acid are phytotoxic to aquatic plants. Other major degradates have similar structure to acid (XDE-848 hydroxy acid) or parent (XDE-848 benzyl hydroxy). These would also be expected to be active for vascular (elongating) plants. Therefore, the parent plus three major degradates would be included as the stressor of concern for plants. [29]

There is concern regarding the florpyrauxifen-benzyl transformation by-products and their persistence in the environment. The major degradation product of florpyrauxifen-benzyl is florpyrauxifen, which is commonly referred to as the acid form of florpyrauxifen-benzyl. "Florpyrauxifen is herbicidal to a lesser extent than florpyrauxifen-benzyl, however its persistence may have unintended consequences for non-target species in lakes."[30] (Emphasis added) - "Florpyrauxifen-benzyl formed four transformation products over the same timescale, with the bioactive product florpyrauxifen persisting up to 30 days post-treatment. Nevertheless, the dominance of florpyrauxifen as the primary environmental transformation product is critical due to its known herbicidal properties, indicating its formation and persistence in lake could exert additional, unintended herbicidal activity on the plant population."[31]

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[28] Van Frost, Sydney R. 2023. Characterizing the Environmental Fate of Aquatic Herbicides by Connecting Quantification in Lakes to Laboratory Studies. Thesis to University of Wisconsin – Madison.

[29] *Environmental Fat and Ecological Effects Risk Assessment for the Registration of the New Herbicide for the Use on Rice and Aquatics Florpyrauxifen-benzyl*. Prepared by United Stated Environmental Protection Agency Office of Pesticides Program Environmental Fates and Effects Division Environmental Risk Branch V 1200 Pennsylvania Ave., NW Washington, DC 20460. April 11, 2017.

[30] Arena, M, et al. 2018. Peer Review of the pesticide risk assessment of the active substance florpyrauxifen. EFSA J 2018, 16 (8), 5378.

[31] Van Frost, Sydney R. 2023. Characterizing the Environmental Fate of Aquatic Herbicides by Connecting Quantification in Lakes to Laboratory Studies. Thesis to University of Wisconsin – Madison.

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"Laboratory studies used to investigate transformation of pesticides and other polar organic compounds for regulatory risk assessment often fall short of accurately replicating environmental conditions. For example, photodegradation studies do not require modeling for all compounds under *in situ* conditions or quantification of indirect photodegradation rates, which can be an important transformation pathway. Similarly, biodegradation experiments oversimplify sediment-water dynamics and do not replicate ambient nutrients, oxygen, and light that microbial populations experience in aquatic environments. In addition, regulatory studies typically do not consider transformation products, which may retain bioactivity. Thus, the emphasis of regulatory studies on active ingredients under highly idealized conditions may inadequately describe the complete fate of applied pesticide solutions at an ecosystem scale."[32]

Based on this evidence, there is concern regarding the use of florpyrauxifen-benzyl in deeper oligotrophic lakes such as Lake George where there will be transport of the herbicide to deeper waters, significantly increasing degradation time as well as concern about the persistence of and unknown impacts from the degradation products. The applicant has failed to acknowledge or mitigate these concerns that would have significant impacts to Lake George and its ecosystem. This issue is substantive and significant and warrants adjudication.

10. **There are acknowledged risks and impacts to native aquatic vegetation and benthic invertebrates.** The EPA Environmental Risk and Ecological Risk Assessment states "Based on available toxicity data and mode of action, risks to vascular aquatic plants, and to a lesser extent non-vascular aquatic plants, from the proposed uses of florpyrauifen-benzyl (and its degradation products) are expected. Furthermore, the higher EECs from the aquatic (in-water) use established higher risk estimates than the rice use. Where these effects occur, they would be expected to also have indirect effects on organisms that occupy high tropic levels, especially aquatic invertebrates, fish and herbivorous, insectivorous and piscivorous birds and mammals."[33]

Claims of "high selectivity" of florpyrauxifen-benzyl to Eurasian watermilfoil are overstated. In response to SePRO's claim of "superior tolerance to native plant species," USEPA's response was – "Due to a lack of comparative information about superior selectivity to native plant species, the agency cannot conclude that this is a benefit of registration."[34] Florpyrauxifen-benzyl is a synthetic auxin, i.e. growth hormone, that causes excessive

[32] Ibid.

[33] *Environmental Fat and Ecological Effects Risk Assessment for the Registration of the New Herbicide for the Use on Rice and Aquatics Florpyrauxifen-benzyl*. Prepared by United Stated Environmental Protection Agency Office of Pesticides Program Environmental Fates and Effects Division Environmental Risk Branch V 1200 Pennsylvania Ave., NW Washington, DC 20460. April 11, 2017.

[34] United States Environmental Protection Agency. Memorandum Re: Review of Benefits of the Registration of Florpyrauxifen-benzyl in Aquatic Use Sites. Prepared by Caleb Hawkins, M.S. Biologist, Biological Analysis Branch. Dated June 16, 2017.

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plant growth. While it is thought that florpyrauxifen-benzyl may generally not typically adversely affect monocotyledons compared to dicotyledons (broadleaf) plant species, previous research demonstrates florpyrauxifen-benzyl is effective at impacting several monocotyledon aquatic plants. It should be noted the mode of action of florpyrauxifen-benzyl, which mimics plant auxins, means that all plants will be impacted because all plants are regulated by auxins. Even the Specimen Label from SePRO cautions users about this. High toxicity to all plants is expected but it may take longer for the effects to be seen in some more broad-leaf species, while thin leafed species such as watermilfoil seem to show effects within hours or days. Additionally, the sensitivity of common native aquatic plants is documented by the manufacturer of florpyrauxifen-benzyl, including various milfoils, stargrass, water marigold, coontail, eloda, and pondweeds.[35] These species are concerning as they have been identified within the proposed treatment area during LGA site surveys conducted in September 2023.

Three native milfoils were identified as present within the proposed treatment sites, one of which is a New York State protected species during the LGA surveys. Another New York State protected species, *Subularia aquatica*, was also identified in the shallow areas of Blairs Bay and could be impacted by the proposed treatment. *Myriophyllum alterniflorum*, while a state protected species, has been overlooked in Lake George due to its apparent stable status in the lake, which is a poor risk assessment when taking into consideration impacts to the local ecological habitat and resident's enjoyment of the lake. It is puzzling and concerning that the LGPC survey did not document any *Myriophyllum* sibiricum, since this native was photographed growing throughout both bays by the LGA. While widespread in Lake George, only one *M. alterniflorum* plant was identified during the survey. Nine native pondweeds (*Potamogeton sp.*) were observed. Of which, at least two thin-leaf pondweeds were observed and could not be positively identified due to the lack of reproductive structures. There is potential that these species could be protected in New York State. To this end, *Zannichellia palustris* was not previously confirmed in Lake George until Summer 2023 by LGA staff. While not a protected species, it gives reason that some species are still being confirmed in Lake George and that there are many common and protected thin-leaf pondweed species in the lake. Additionally, during the LGA surveys of the bays, samples of five different watermilfoil specimens were collected and sent to Thum Laboratory at Montana State University for genetic analysis. One of the specimens came back as a strain that was not identified in their Milfoil Mapper database as detailed in the following - "The other strain identified in this lake (Lake George), E_MYR_15377, was unique to the lake and we have not yet seen it elsewhere. Since this strain is unique, we do not have any herbicide assay data on it. Even though there is no herbicide assay data present for this strain, it is recommended to continue to monitor herbicide treatment efficacy in this waterbody. These strains will be added to our

[35] Heilman, Mark. 2019. Selective Control of Invasive Watermilfoils with ProcellaCOR Aquatic Herbicide and Response of Native Aquatic Plants. SePro

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Milfoil Mapper database, so thank you for contributing samples for us to include."[36] Based on this genetic testing and correspondence, this is evidence of a unique species that should be considered as rare and should be protected. Therefore, with the abundant species susceptible to florpyrauxifen-benzyl treatment, presence of protected species in the proposed treatment areas, and the strong potential for unidentified protected species, there is substantial concern regarding the use of an herbicide that is not selective and will result in loss of species.

Application materials state *Nitella* has a "Low susceptibility to 4PDUs/acft ProcellaCOR." In fact, the applicant has often referenced the ProcellaCOR treatment at Minerva Lake in the Adirondacks as demonstrating the selectivity of the herbicide, which the APA used as evidence in their biased presentation supporting the use of ProcellaCOR. But the post-application surveys in Minerva Lake indicated an approximate 50% decrease in *Nitella*. This was categorized as "Negligible" by APA staff during a March 14, 2024, presentation to the APA Board[37], which is concerning since *Nitella* is vital for the nutrient balance of Lake George and absorbs inorganic nutrients directly from the water column. Any impact on this vital macroalgae of the Lake George ecosystem from the proposed pesticide use must be evaluated.

There is little research provided regarding the impacts to benthic macroinvertebrates and the applicant's application materials fail to document any of the local communities that would be impacted by the treatment. Studies state there is low potential for acute mortality risk to aquatic invertebrates but only 2 species of invertebrates were tested. USEPA Risk Characterization states – "Due to the lack of a definitive NOAEC for freshwater midge, chronic risk to freshwater benthic invertebrates associated with rice and aquatic uses cannot be determined with precision nor can it be reasonably precluded."[38] Also it was stated – "[f]or freshwater benthic-dwelling invertebrates, chronic effects were observed in sediment toxicity studies as low as 4.3 ug ai/L"[39]. A concerning fact documented in studies is that florpyrauxifen-benzyl and its major degradation product florpyrauxifen persist in soils for a much longer period of time, as stated in the previous Comment Item 8. "Florpyrauxifen-benzyl was detected in the sediments up to 50 days after treatment, compared to only 7 days in the water column. Thus, florpyrauxifen-benzyl may undergo enhanced persistence in lake sediments compared to water."[40] In another study: "As observed under field conditions, both florpyrauxifen-benzyl and florpyrauxifen were

[36] Personal correspondence from Ashley Wolfe, Thum Laboratory, Montana State University, Bozeman, MT. Dated January 8, 2024.
[37] Presentation by Aaron Ziemann during March 14, 2024 Adirondack Park Agency Board meeting regarding Brant Lake Association permit application.
[38] Memorandum Re: Florpyrauxifen-benzyl:Environmental Fate and Ecological Risk Assessment for the Section 3 New Chemical Registration. Prepared by Jose Melendez, Van Vogel and Keither Sappington from USEPA Environmental Fate and Effects Division. Dated April 11, 2017.
[39] Ibid.
[40] Van Frost, Sydney R. 2023. Characterizing the Environmental Fate of Aquatic Herbicides by Connecting Quantification in Lakes to Laboratory Studies. Thesis to University of Wisconsin – Madison.

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detected over 80 days after treatment in microcosm sediments, compared to up to 34 days in water."[41] As stated earlier in this correspondence, a study regarding the effects of florpyrauxifen-benzyl on freshwater mussels had the following findings: "Our results show that the herbicide formulations and compounds tested were not acutely toxic to juveniles of these two species of freshwater mussels, indicating minimal risk of short-term exposure from florpyrauxifen-benzyl applications in the environmental for aquatic weed control. However, potential chronic or sublethal effects remain uncharacterized and warrant additional investigation."[42] Clearly, there is a need to survey the benthic invertebrate community and assess the impacts from florpyrauxifen-benzyl, for which studies are noted as being limited.

Another very important part of the Lake George ecology is the fishery that can be impacted by the florpyrauxifen-benzyl herbicide treatment. The USEPA's Ecological Risk Conclusion found that although it is stated the studies for the active ingredient for rainbow trout and sheepshead minnow were not useful, studies for common carp found that less than 50% of the carp died within the EECs (Estimated Environmental Concentration) but there were numerous sublethal effects in the carp, such as lethargy, lack of eating, surfacing, etc. In general, florpyrauxifen-benzyl related compounds produced only sub-lethal effect in fish. Dose related sub-lethal effects include discoloration, lethargy and surfacing. Chronic testing with florpyrauxifen-benzyl established a NOAEC of 37.3 *u*g/L and an unbounded LOAEC of >37.3 *u*g/L. No statistically-significant sub-lethal effects were noted. However, it should be noted that clinical signs of toxicity were observed during the study, including: one fish I the vehicle control on day 12 from the 2.97 ug/L treatment on day 10, one to three fish in the 6.08 *u*g/L treatment on days 7 to 10, and in one fish in the 12.7 *u*g/L treatment on day 7. One fish was observed with spinal curvature in the 620 *u*g/L treatment from day 7 to 11.[43] This is troubling since carp are one of the most resistant fish and can survive the most difficult environmental conditions. In addition, long term use of herbicides, including florpyrauxifen-benzyl, have resulted in significantly reduced large-mouthed bass populations in Lake St. Catherine, VT (personal conversation with local outfitter).

As documented, there are numerous ecological concerns from the proposed use of florpyrauxifen-benzyl in Lake George from impacts to native aquatic plant communities, to plants on the New York State protected species list, to benthic invertebrates and to the

[41] Ibid.
[42] Buczek, Sean, Archambault, J., Cope, W.G., and Heilman, M. 2020. *Evaluation of Juvenile Freshwater Mussel Sensitivity to Multiple Forms of Florpyrauxifen-benzyl*. Bulletin of Environmental Contamination and Toxicology Volume 105, pages 588-594.
[43] *Environmental Fat and Ecological Effects Risk Assessment for the Registration of the New Herbicide for the Use on Rice and Aquatics Florpyrauxifen-benzyl*. Prepared by United Stated Environmental Protection Agency Office of Pesticides Program Enviro
nmental Fates and Effects Division Environmental Risk Branch V 1200 Pennsylvania Ave., NW Washington, DC 20460. April 11, 2017.

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fisheries. These potential adverse impacts to native species and organisms are a substantive and significant issue that should be adjudicated.

11. **New Jefferson Project data, collected by state-of-the-art technology in one of the proposed target bays, indicates that the timing of the herbicide application in late spring (May-June) is concerning as it occurs during very critical annual limnological events with a wide range of conditions, including thermal stratification, algal growth and zooplankton, each of which will impact the efficacy of treatment.**

    - **Thermal stratification starts setting up in May, with varying conditions especially in the shallow bays that can become uniform early in the season;**
    - **Data indicates increased algae growth in the lake starting in May, which is in direct competition with the aquatic weed population. This means if the weeds are not present due to an herbicide treatment, additional algae growth will likely result from a lack of competition as well as from an increase in released nutrient from decaying plant matter.**
    - **Data indicates there is a robust zooplankton community that is in the water column at the same time as the proposed herbicide treatment. This community resides in lake sediments during the day where studies indicate the herbicide can reside up to 50 days. Impacts to the zooplankton population will result in increased algae growth from lack of grazers.**

    Each of these issues is substantive and significant and cumulatively can have a tremendous adverse impact on Lake George as well as treatment efficacy.

12. **With the previously referenced impacts to native aquatic vegetation, there will be adverse and denigrated wetland values that jeopardize the delicate ecology and foodwebs of Lake George.** This is yet another substantive and significant issue.

13. **There is concern regarding the potential for the development of hybrid watermilfoil that could be resistant to ProcellaCOR, especially based on the previously mentioned unique strain of watermilfoil found in the bays, which the manufacturer recommends combatting using multiple herbicides or a cocktail of chemicals.** The first page of the ProcellaCOR EC label contains Product Information regarding Resistance Management: "ProcellaCOR EC is classified as a WSSA Group 4 Herbicide (HRAC Group O). Weed populations may contain or develop biotypes that are resistant to ProcellaCOR EC and other Group 4 herbicides. If herbicides with the same mode of action are used repeatedly at the same site, resistant biotypes may eventually dominate the weed population and may not be controlled by these products. Unless ProcellaCOR EC is used as part of an eradication program or in a plant management system where weed escapes are aggressively controlled, do not use ProcellaCOR alone in the same treatment area for submerged and emergent plant control unless used in combination or rotated with an

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herbicide with an alternate mode of action."[44] There is concern regarding the recommendation of use of multiple herbicides resulting in a cocktail of chemicals being used in Lake George. The development of resistant strains must be considered based on the manufacturer's information as well as the fact that the watermilfoil species in the specified bays already demonstrate the ability to create different genetic strains, which evidence was provided in the previous comment with laboratory results from Montana State University. The cocktail of chemicals, including ProcellaCOR, has led to significant problems in Chautauqua Lake.[45] This is also a substantive and significant issue that requires adjudication.

14. **Florpyrauxifen-benzyl is a fluorinated pesticide for which there is inadequate information on the long-term ecological and human health impacts.** On February 1, 2024, the Minnesota Department of Agriculture published a report to the State legislature which identified 95 active ingredient pesticides that meet the Minnesota definition of PFAS[46], otherwise known as "forever chemicals" based on the pesticides structure. The active ingredient in ProcellaCOR was identified by the Minnesota Department of Agriculture as a PFAS- containing pesticide. The Minnesota Interim Report also notes that little is known about whether the inert ingredients and/or adjuvants that are part pesticide formulations, may also contain PFAS compounds. While florpyrauxifen-benzyl is claimed to degrade fairly quickly, the resulting degradates identified in the EPA's registration docket retain the Fluorine-Carbon bond which Minnesota uses to determine a PFAS pesticide.

Conclusions

With the previously reported concerns regarding the limited amount of peer-reviewed, non-industry studies, hydrodynamic complexities resulting in reduced concentration-exposure time ("CET"), potential for hormesis, deviation from USEPA Pesticide Label requirements, questions on product half-life and degradation products, impacts to the native ecosystem, the failure of New York State to conduct an adequate or legal environmental review on florpyrauxifen-benzyl and the recent determination that the active ingredient in ProcellaCOR contains PFAS, the Lake George Association and the Lake George Waterkeeper strongly oppose the granting of the permits by the APA. As stated in numerous studies, "florpyrauxinfen-benzyl is understudied in laboratory and field settings with the most existing information in US Environmental Protection

[44] ProcellaCOR EC Specimen Label (EPA Reg No. 67690-80) Produced for SePRO Corporation, 11550 North Meridian Street, Suite 600, Carmel, IN 46032. 2018.
[45] Independent Third-Party Monitor for Chautauqua Lake Macrophyte Management – 2020 Herbicide Program. Prepared for Chautauqua Lake & Watershed Alliance. Prepared by: Princeton Hydro, LLC 203 Exton Commons Exton, PA 19341. January 2021.
[46] PFAS in Pesticides – Interim Report to the Legislature. Dated February 1, 2024. Prepared by Minnesota Department of Agriculture Pesticide and Fertilizer Management Division 625 Robert Street North Saint Paul, MN 55155.

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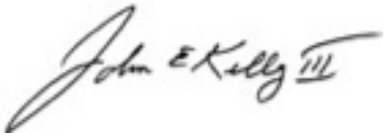
Agency registration reports, product labels and safety sheets."[47] There is a lack of real field data – "The herbicide florpyrauxifen-benzyl (trade name ProcellaCOR) has recently been approved but understanding of effectiveness is mostly limited to microcosm studies. Given its recent approval, detailed information on effectiveness in field applications of EWM is very limited."[48] These concerns were also expressed by the Vermont Department of Environmental Conservation, which recently denied a ProcellaCOR treatment application for Lake Bomoseen and distinguished the use of ProcellaCOR in severely impacted lakes from its use in more pristine and ecologically complex and sensitive lake. Especially when the LGPC is currently operating an effective management program according to their own statements and there is not urgent need for chemical treatment, the ecological, reputational, and economic risks of using a synthetic growth hormone herbicide in Lake George are simply too great.

Therefore, the Lake George Association in partnership with the Lake George Waterkeeper, the numerous riparian owners who oppose the use of the proposed herbicide and do not give consent for the treatment and the four municipalities within, adjacent to, and downstream from the proposed treatment, file these comments to register strenuous objection to the applications by the LGPC for the use of ProcellaCOR in Lake George. The APA should follow the requirements of the Adirondack Park Agency Act and require an adjudicatory hearing to begin the process of adjudicating the substantive and significant issues that have been identified in these comments.

The LGA and the Lake George Waterkeeper look forward to continue working with the New York State Adirondack Park Agency to defend the natural resources of Lake George and its watershed. We also recognize our ongoing partnership on numerous initiatives with the Lake George Park Commission. Thank you for your consideration.

Sincerely,

Christopher Navitsky, PE
Lake George Waterkeeper



Doctor John E. Kelly, III , Board Chair
Lake George Association

cc: all by electronic mailing
Dave Wick, Executive Director LGPC
Joseph Zalewski – Regional Director, NYSDEC Region 5
Thomas West, Esq.

[47] Van Frost, Sydney R. 2023. Characterizing the Environmental Fate of Aquatic Herbicides by Connecting Quantification in Lakes to Laboratory Studies. Thesis to University of Wisconsin – Madison.
[48] Dahlstrom Davidson, Alisha. 2023. Field application of florpyrauxifen-benzyl to treat hybrid Eurasian watermilfoil: Initial effects on native and invasive aquatic vegetation.

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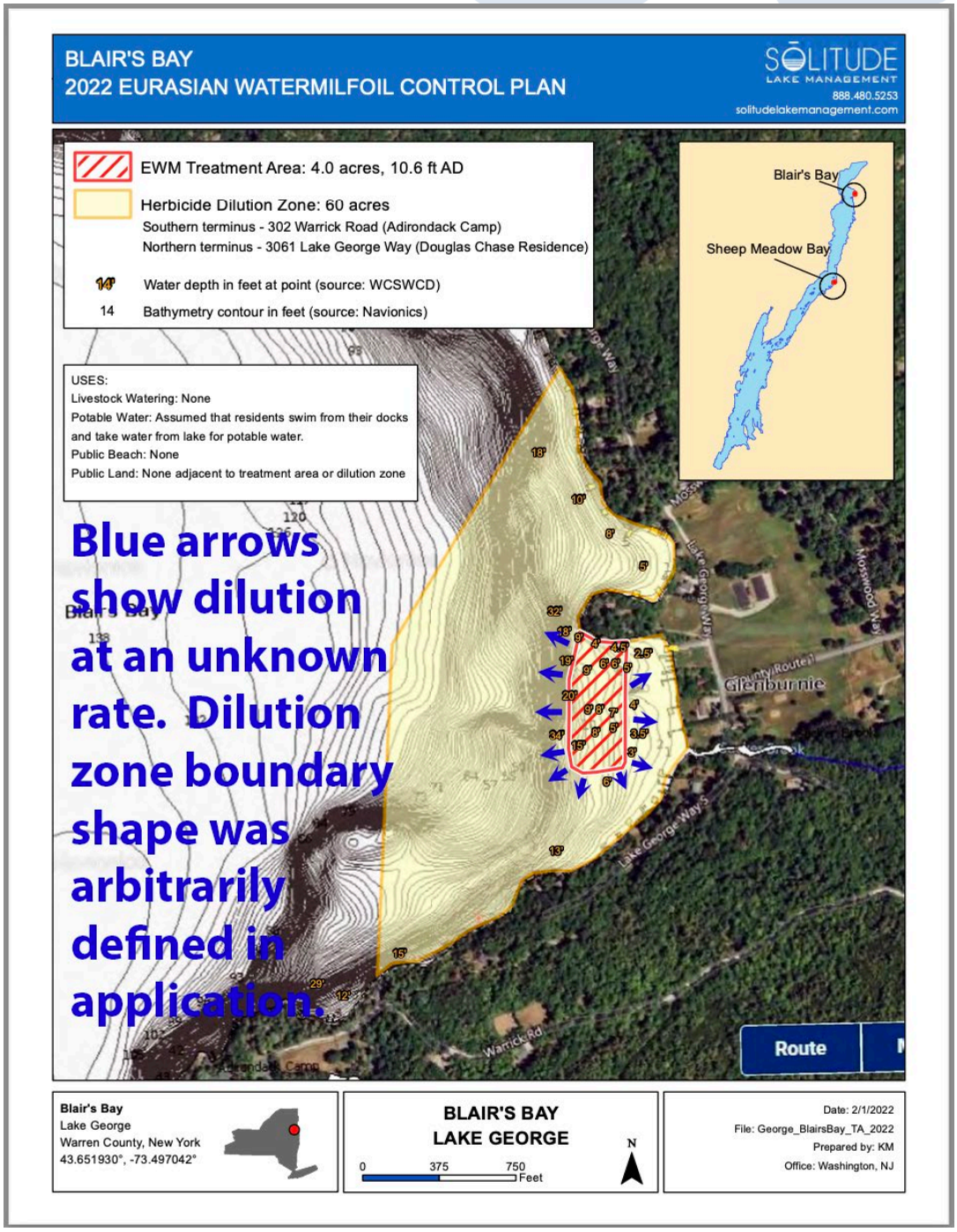

FIGURE 1

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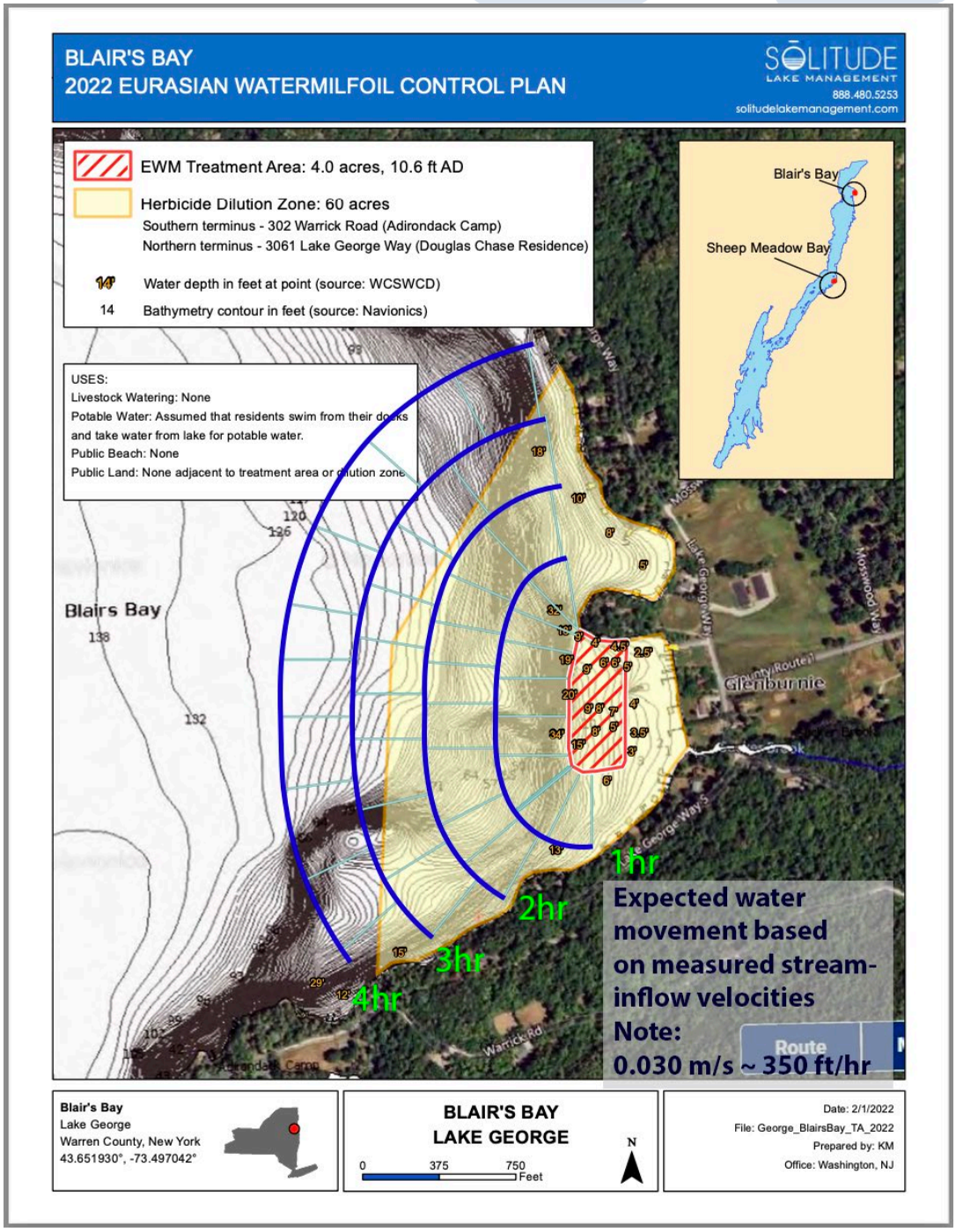

FIGURE 2

LGA Lake George Association

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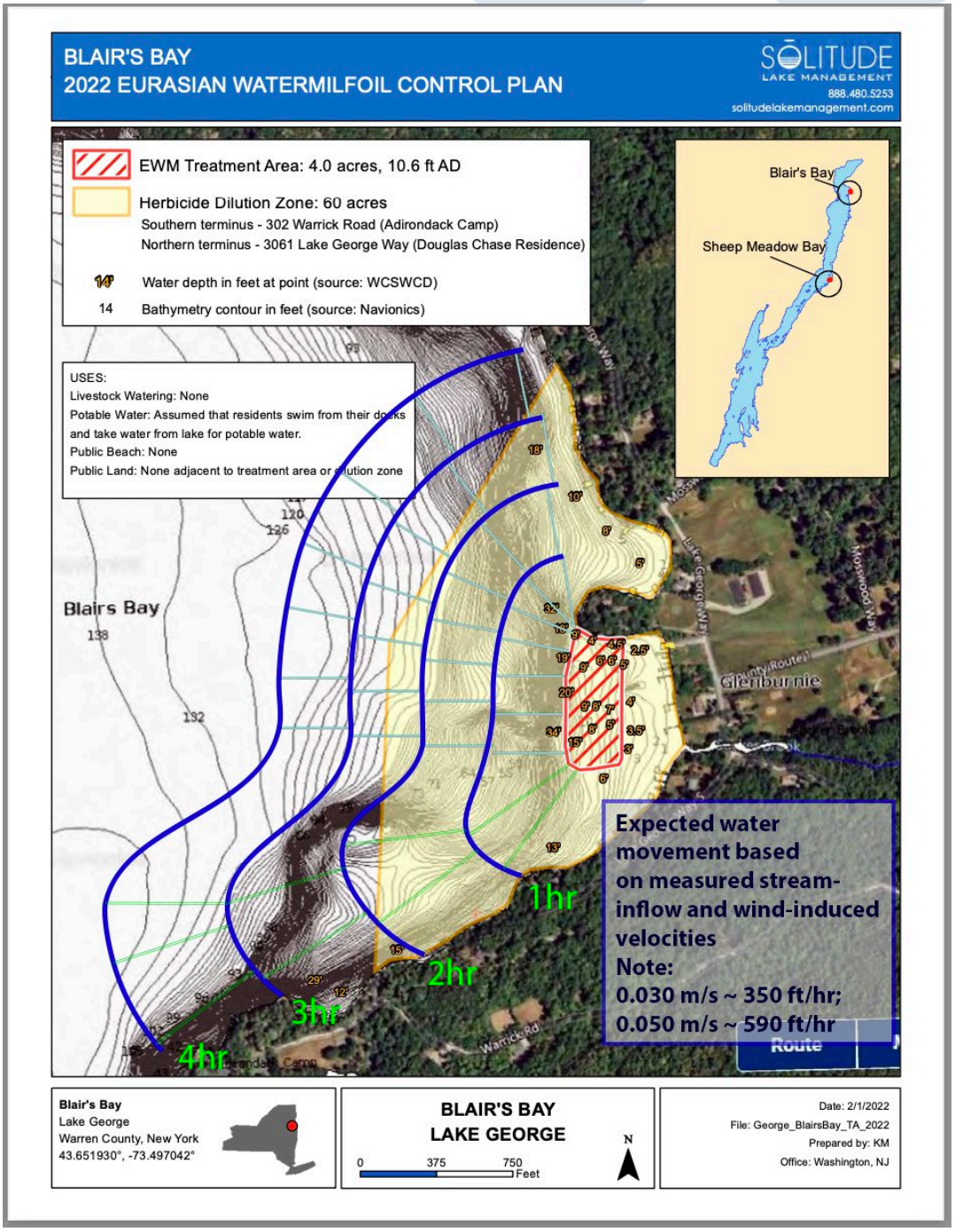

FIGURE 3

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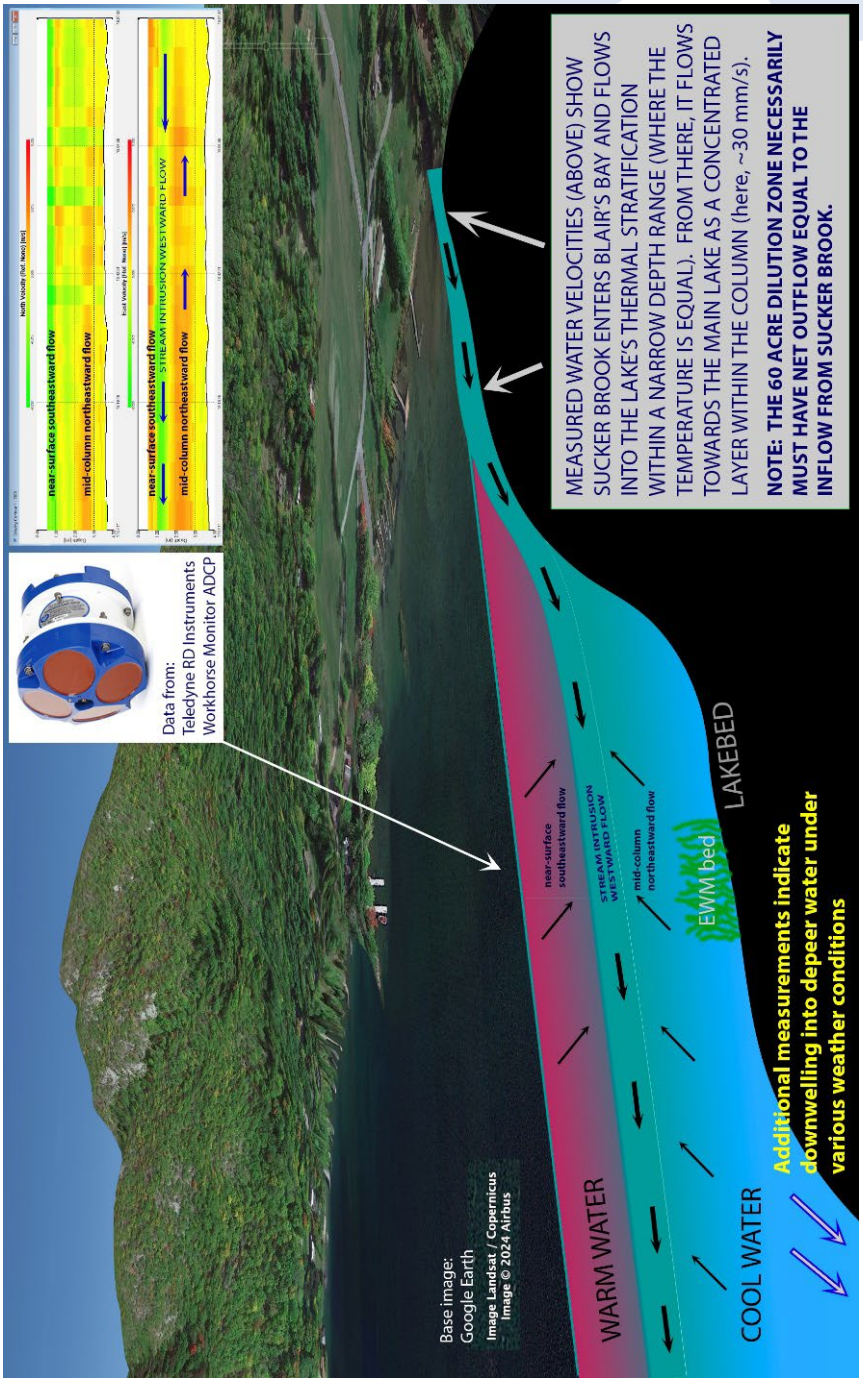

FIGURE 4

LGA
Lake George Association

To the Adirondack Park Agency:

On Tuesday, May 28, I attended a public meeting of the Lake George Park Commission at the North Queensbury Fire Station in Cleverdale, New York. Along with other normal business-as-usual issues like dock permits and legal issues, there was a presentation from Bob Bombard, Warren County SWCD, about the use of ProcellaCOR in local lakes. He discussed in detail the assessment of contamination prior to application, and the sampling of both EWM health and PC residuals in the application areas at various points in time after the application. This was followed by testimonials from representatives of three local small lakes where ProcellaCOR had been used, which were deemed to have been successful. The Board then voted to go ahead with the application of ProcellaCOR in two bays of Lake George.

Following this vote, there was over an hour of public comment, and, as usual with any controversial issue, the ones who were against the use of this very much outnumbered people who were there to support it. You may have already been assailed with many letters of protest that perhaps range from the quoting of many "scientific" studies that say that ProcellaCOR in fact poses a clear and future danger to the water, the sediments, other species in the target area (both plant and animal), and fear of using the water for everything from drinking, washing, cooking, or watering the garden. Or, worse, fill-in-the-blank form letters or postcards which take little effort or understanding of this very complex decision. The comments were short on cited science studies and long on emotions and hyperbole: "My baby is drinking poisoned water", and "People suck".

I have a camp on a small bay of Lake Hortonia (500 acres) in Rutland County, Vermont. It is shallow and warm, and has become filled with many different kinds of aquatic vegetation that are not native to this lake, but were introduced, probably by boats with the foreign vegetation on them when they entered our water. Eurasian Water Milfoil is one of those invasive species.

Our Lake Association (LHPOA) has been proactive in treating our lake, especially the shallow, warmer, still bays with species-specific herbicides that have been approved by both NYS and VT State Departments of Environmental Conservation. In particular, the Vermont Department of Public Health has stated that ProcellaCOR has not been proven to pose a public health risk if used properly. My understanding is that it has been used in NYS lakes since 2019 and after careful follow-up studies no ill effects from its application have been discovered.

ProcellaCOR has been used in many lakes in New York State, with marked success. Hand harvesting is not only expensive, but even a tiny bit of a pulled up piece of Milfoil can then go off to root somewhere else. One of the comments on the 28th was that one area that had been PC treated was EWM-free for two years and then got recolonized. This, he concluded, meant that PC was present in the ecosystem for those two years before dissipating and making the area susceptible to regrowth. My take was that it was a barren area that was recolonized by rerooted floaters (I teach about succession of disturbed soil…I am sure it is the same underwater as it is above). I recently spoke with a diver who does hand harvesting in Lake George and he believes that it is a band-aid treatment for a major bleed. But he makes a lot of money doing it so does not weigh in with an opinion to the people who hire him for this purpose. Having said this I do agree that DASH support is a necessary piece of the invasive solution where applicable.

This may be an issue of the "squeaky wheels" getting the grease…some Lake George residents have been very vocal in their opposition. Quite often the more satisfied lake dwellers do not offer an opinion to their state officials but their opinions should also be surveyed and considered.

I would like to think that in this issue we can trust the scientists who have done exhaustive studies on these herbicides, and have deemed them not to be a health risk even in lakes where water is drawn for human consumption. When our Lake Hortonia association leaders proposed the use of these chemicals, I never had a moment of doubt. They live here, they play here, their families visit here, many of them have spent their whole lives here, and many of their camps have been in their families for several generations (very much like many Lake George Park Commission board members and staff). I am confident that they would not do anything to negatively affect that.

I spent ten years working as a summer instructor for the National Outdoor Leadership School in Wyoming and Montana, eight years as a Licensed Adirondack Guide, and several years on the Board of Governors for the Adirondack Mountain Club, where I was active in the Education Committee and initiated many outdoor education projects. I conducted dozens of seminars on outdoor skills. I am an ADK 46er and taught wilderness skills courses and did trail maintenance. I designed three interpretive signs identifying the native flora and fauna in ponds, wetlands and woodlands in Crandall Park in Glens Falls. I lived in Diamond Point for a year, and Pilot Knob for another year (during which I worked as an EMT with North Queensbury Rescue Squad). I have owned a farm business in Kingsbury, NY for the last 16 years.

I mention this background to indicate that I have spent at least three years of my life living in the wilderness, where you are aware of every biotic and abiotic aspect of the environment. As a farmer, I am outside all of the time. I notice things most people do not. I am always aware of all the life forms that surround me in all of the environments which I enter. I can name almost all of the common names (and many of the Latin names) of the flora and fauna and keep a mental tally of what is found in each ecosystem that I visit.

My property in Vermont has around 600 feet of frontage on a cattail marsh. I know what animals and plants lived there prior to the ProcellaCOR treatment in the water in front of my home in the summer of 2022. So I can say with certainty that after this treatment, **I have noticed no difference** in the number of frogs, turtles, small fish, or waterbirds, many of which resided in my bay during the time of treatment, and in the next summer of 2023. I enjoy Great Blue Herons, Bald Eagles, Ospreys, otters, beavers, muskrats, four species of frogs, two of turtles, and we have nesting Wood Ducks, Canada Geese, and Mallards right off my dock. In the southern end of my bay last summer a pair of loons successfully raised three chicks to adulthood. They are back this year…seven have been sighted on our lake. I actually just saw the otter for the first time in 2023…perhaps a coincidence, or perhaps due to the loss of the milfoil matting that may have hampered prior hunting attempts.

Some of the public comments mentioned that Eurasian Water Milfoil is not at a “critical” level in Lake George at this time and so this PC treatment is overkill. But waiting for things to get critical seems shortsighted. For over 25 years I was the adopter of and maintained the two lean-tos below Black Mountain in Hague (Lapland Pond and Black Mountain Pond). In almost three decades I saw the marshland area around Black Mt. Pond turn from productive cattail marsh (even found a native wild iris and sundew) into a phragmites monoculture, which provides very little in value to the ecosystem of this remote area. We are seeing the invasion of Japanese Knotweed and Purple Loosestrife as well, and if this isn’t addressed with remediation efforts sooner than later it will be that much more difficult to control. Since ProcellaCOR is species specific as opposed to broad spectrum herbicides that kill everything, it is much better solution to the problem of EWM.

I am a firm believer in being PROACTIVE with environmental issues, rather than REACTIVE. ProcellaCOR use is a perfect example of being proactive, and addressing a difficult, controversial issue in this way is a great example of the Lake George Park Association being objective, rather than subjective, in this decision. The Board listened to the protesters politely, stoically, patiently, and with respect. I estimate that more than half of the speakers were respectful and thanked the board for listening to their concerns. Most of them know that Board members also love Lake George (and many of them live on it and drink and swim in the waters) and want what is best for its future health. Just like I trust my Association to protect the waters and native flora and fauna of my little lake in Vermont and to care about the health and viability of Lake Hortonia well into the future, I have complete trust that the Lake George Park Commission is a thoughtful steward of Lake George and its waters, flora and fauna, residents, and visitors.

As a lifelong teacher of Science (46 years) with a degree in biology, chemistry, and having a Graduate degree from UVM in Natural Resource Planning and Science Teaching, I stand by the science. I hope that you will, too, and allow the Lake George Park Commission to move forward with this ProcellaCOR treatment.

Respectfully,

Pattye Nicolls

(518) 747-6306 pnicollswv@gmail.com

From: darkbird@aol.com
To: APA Regulatory Programs Comments
Subject: No ProcellaCOR
Date: Thursday, May 16, 2024 3:42:09 PM

Dear Everyone at the Adirondack Park Agency,
Please listen to everyone that has opposed ProcellaCOR. This is a FOREVER CHEMICAL that you want to put into Lake George. This will destroy the lake instead of just a controlled kill of certain types of plants it will destroy the ecosystem of the Lake. Lake George is a unlike many other lakes. When you are near Lake George you can feel the activity and life within the lake. Please don't kill Lake George!
Thank you for listening.
Sincerely yours,
Cynthia Soroka-Dunn
Fine Art Nature Photographer and Lake George Lover for over 55 years.

From: Kathy Gable
To: APA Regulatory Programs Comments
Subject: no procellor
Date: Monday, May 27, 2024 5:04:40 PM

I am from Huletts landing , NO PROCELLOR.

Kathy Fox Gable

From: J P
To: APA Regulatory Programs Comments
Subject: No to Lake George herbicides
Date: Friday, May 17, 2024 1:01:09 PM

Please reconsider your desire to add the herbicide ProcellaCor to Lake George at Huletts Landing and Glenburnie. As we all know this 10,000 year old lake is one of the cleanest and clearest lakes in the world. Why would we ever consider adding chemicals to our most precious of natural resources? How many times in our past have we been sold on the safety of this or that chemical or introduced this or that species to our environment only to find the real negative impacts years later.

Please no, no no to ProcellaCOR in lake George.

Dr Joseph Purman

From: Forrest Wright
To: APA Regulatory Programs Comments
Subject: Not 1 Drop of ProcellaCOR in Lake George
Date: Thursday, May 30, 2024 7:49:33 AM

My personal experience (Forrest Wright) regarding the quality of Lake George water.

I have been drinking Lake George water for seventy years. A number of years ago I took a sample of Lake George water directly from my kitchen sink faucet. The only filters we have on the water line from Lake George are two sediment filters, 30 micron and 5 micron. A Poughkeepsie water analysis lab tested the water sample. When I picked up the report, they asked me where the sample was from? Answer from Lake George. "They told me this was the best quality and purest water they had ever tested."

Lake George is the best quality reservoir to obtain our drinking water. Let's keep Lake George water safe and chemical free so we can keep our Lake George water "the best quality and purest water" available to drink.

It is imperative that you stop NY State agencies from applying the potentially harmful pesticide ProcellaCOR to Lake George, the Queen of American Lakes that brings in $2 billion to the NY State economy every year.

The Lake George Park Commission plans to use this chemical in two bays in Lake George this June to control Eurasian watermilfoil. Milfoil is not a crisis in Lake George, a fact that leadership of the Lake George Park Commission has state publicly. Milfoil has been successfully managed using hand-harvesting methods that do not introduce chemicals into Lake George.

As a concerned citizen, I believe ProcellaCOR will irreparably alter the delicate ecological balance of Lake George. I fear it will endanger the health of our pets and wildlife. I fear treating Lake George with chemicals we don't fully understand will irreparably alter the reputation of Lake George for the 8 million people who vacation here every year, and will negatively impact the quality of life of the tens of thousands who live here.

There is science that cautions us not to rush the irreversible decision to apply this chemical

in Lake George. The Lake George Park Commission isn't listening to the people, towns, scientists, and organizations who object. NYS Department of Environmental Conservation isn't listening either. Nor is the Adirondack Park Agency.

Please help us. Please listen to the citizens of your state and stop this rash and unnecessary use of a chemical that is not made for use in a unique waterbody like Lake George.

Lake George property owners, 12 Pine Knoll Dr, PO Box 2444, Silver Bay, NY 12874

Forrest Wright

Nancy Wright

From: Forrest Wright
To: APA Regulatory Programs Comments
Subject: Not 1 drop of ProcellaCOR in Lake George
Date: Thursday, May 30, 2024 9:03:44 AM

Dear Governor Hochul

My dad's personal experience (Forrest Wright) regarding the quality of Lake George water.

He has been drinking Lake George water for seventy years. A number of years ago he took a sample of Lake George water directly from my kitchen sink faucet. The only filters we have on the water line from Lake George are two sediment filters, 30 micron and 5 microns. A Poughkeepsie water analysis lab close to where we lived,tested the water sample. When he picked up the report, they asked me where the sample was from? Answer from Lake George. "They told him this was the best quality and purest water they had ever tested."

Lake George is the best quality reservoir to obtain our drinking water. Let's keep Lake George water safe and chemical free so we can keep our Lake George water "the best quality and purest water" available to drink.

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There is science that cautions us not to rush the irreversible decision to apply this chemical in Lake George. The Lake George Park Commission isn't listening to the people, towns,

scientists, and organizations who object. NYS Department of Environmental Conservation isn't listening either. Nor is the Adirondack Park Agency.
Please help us. Please listen to the citizens of your state and stop this rash and unnecessary use of a chemical that is not made for use in a unique waterbody like Lake George.
Lake George property owner, 12 Pine Knoll Dr, Silver Bay, NY 12874
Joel Wright

From: Denise Miller
To: APA Regulatory Programs Comments
Subject: Not One Drop
Date: Thursday, May 30, 2024 7:49:52 AM

Please don’t put this chemical in our Lake. Hand harvesting should be used. Chemicals like these cause irreversible harm. History has shown that simple nontoxic solutions are environmentally sound and the best for all of us. Listen to the people and reverse this decision before it becomes a huge mistake.

From: John Powell
To: APA Regulatory Programs Comments
Subject: Oppose ProcellaCOR in Lake George
Date: Wednesday, May 29, 2024 12:03:05 PM

ATTN: Adirondack Park Agency,

I oppose the use of the ProcellaCOR herbicide. Lake George is known for being a clean, pure body of water and it is our duty to protect our waterways, our drinking water, and the health of our families and children.

This herbicide is dangerous and to use it without informed consent is an ethical misstep. In fact, the use of it at all is an ethical misstep. Keep forever chemicals out of our waters.

Mindfully,

John Powell LCMHC, LMHC, NCC, Reiki Master
Mind*Body*Spirit LLC
802-391-9104
mindbodyspiritemail@gmail.com
Pronouns: he/his/him

Visit my website or my Psychology Today profile

From: alana desjardins
To: APA Regulatory Programs Comments
Subject: Opposed To ProcellaCOR
Date: Wednesday, May 29, 2024 7:47:48 PM

To whom this may concern,

Please do not allow the use of ProcellaCOR in Lake George. Lake George is known as one of the cleanest lakes in America and attracts so many people from all over the world. Using a chemical to get rid of invasive species is an embarrassment to the Lake George community. I don't want this in my drinking water or my children's drinking water. We say no to PFA's and no to ProcellaCOR.

Obviously invasives are a big problem but using a chemical to treat them seems backwards. Let's not take the easy way out and look out of the box to solve this problem. In the mean time let's utilize the people that have offered to pay for hand harvesting.

Please make the right decision and keep ProcellaCOR out of Lake George!

Sincerely,
Alana Desjardins

From: Matt Plouffe
To: APA Regulatory Programs Comments
Subject: Opposition of Forever chemicals in Lake George
Date: Thursday, May 30, 2024 12:53:31 PM

Hello,
My name is Matt Plouffe and I am a resident of Willsboro, NY. I spent a majority of my childhood visiting Lake George and camping on the islands in the Narrows with my family.

I oppose ProcellaCOR in Lake George. This chemical is simply too risky for drinking water.

Thank you,
Matt Plouffe

From: Adam Tower
To: APA Regulatory Programs Comments
Subject: Opposition to ProcellaCOR in Lake George
Date: Thursday, May 30, 2024 12:18:56 PM

Good Afternoon,

I am disappointed to learn the Lake George Park Commission is going to put herbicide (ProcellaCOR) into the lake and drinking water. The previous court win/injunction got appealed and overruled.
The herbicide was recently classified by Minnesota's Department of Agriculture as a PFAS ("forever chemical").
I would like to visit Lake George with my family in the future; however, if you move forward with the decision to put this chemical into the Lake then we'll have to find a safer place to vacation & swim.

I sincerely hope you will overturn the decision.

Respectfully,
Adam Tower

Dear APA,

This is in reference to Project 2023-0017 for Sheep Meadow Bay or Project 2023-0018 for Blairs Bay. I read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I absolutely support the issues identified therein.

I have been coming since 1981, when I married into the Parlin clan, who have a significant property near The Silver Bay Association. At that point, we were drinking the lake water. In fact, that pump still exists in case the well fails.

We also own the Uptown building in Hague. It was a well-known and popular restaurant for many years. It is located on Hague Brook, which runs into the lake, so we are accustomed to being very careful about anything that could run into the lake.

I am very concerned that the instructions on the Procellacore label are being ignored. There's also a serious lack of information about the long-term effects of this pesticide. I grew up in Schenectady and am thus we aware of the historic damage that forever chemicals have done to the waterways in the North Country. Let's not add The Queen of American Lakes to the list; that would be horrendous!

Yours,

Lauren Parlin

Dear APA,

This is in reference to Project 2023-0017 for Sheep Meadow Bay or Project 2023-0018 for Blairs Bay. I read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I absolutely support the issues identified therein.

I am a fourth generation lake girl and while it's a great privilege, I also take it seriously. I consider myself a steward. I hike the hills of Hague every day to get a wide view of the lake.

My family owns a large property in Silver Bay. Whether I'm a lake-front owner or not, the value of the lake is tied to the purity of the water. I want to keep it pristine for my niece and the next generation and the next.

It's important that we focus on the future and not the present. It's important that we not pursue questionable solutions to an issue that's not that critical; hand-harvesting is containing milfoil at the present.

I strongly object to the use of Procellacore in Lake George. I am horrified that Procellacore contains forever chemicals. I can't overstate my horror. Please listen to the public and refuse to permit the use of this pesticide!

Yours,

Liz Parlin

From: Tom Lloyd
To: APA Regulatory Programs Comments
Subject: PFAS Chemicals in Lake George?
Date: Friday, May 17, 2024 8:55:30 PM

Dear APA:
I have been a Lake George resident for over 60 years. We swim in Lake George, we boat in Lake George, we live on Lake George, we drink, cook and bathe in Lake George water, we glorify the cleanliness of our Queen of American Lakes. Please do NOT allow the introduction of PFAS chemicals, for any purpose, to be introduced into our precious waters. We weed the milfoil too, and it works.
Your neighbor at Cannon Point.
Tom

D. Thomas Lloyd
Founding Principal
Adirondack Studios
Argyle, NY | Orlando, FL | Pasadena, CA | Dubai, UAE

O: +1.518.638.8000 x217
M: +1.518.796.2254
www.wemakeascene.com

From: Michael Martignetti
To: APA Regulatory Programs Comments
Subject: Please don't use ProcellaCOR application anywhere in Lake George.
Date: Thursday, May 16, 2024 11:24:36 AM

Dear APA,

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. https://lakegeorgeassociation.org/sites/default/files/2024-02/02116_DEC_Waterkeeper_LGA_Objections_FINAL.pdf

Please don't use *ProcellaCOR application anywhere in Lake George. To my understanding, the current safer method of controlling the environs of Lake George are safer and working - why fix what isn't broken? Besides, our drinking water is directly out of the lake and not from a well water or public source and we are concerned about negatively effecting our health.*

Thanks,

Michael Martignetti
Summer Bolton Landing Resident

From: David Rice
To: APA Regulatory Programs Comments
Subject: Please help wait on Lake George ProcellaCOR testing
Date: Wednesday, May 29, 2024 11:29:17 PM

Dear Mr. Aaron Ziemann,

My name is David Rice and I am writing you with a plea to do whatever you can to stop the test application of ProcellaCOR in 2 bays of Lake George known as project 2023-0017. I have a Bachelors degree in Evolutionary Ecology and a Masters of Education in Curriculum and Instruction. I am a part of the family who owns about 50% of the shoreline being affected the ProcellaCOR application in an area referred to as Sheep's Head Bay in the LGPC applications to the APA, but it is officially named Jelliffe Knight Bay by the United States Board on Geographic Names, and is on the northeastern portion of Lake George in the hamlet of Huletts Landing. I know I that a may not have any significant power to sway the decision of the state of New York to move forward on using Lake George as an milfoil herbicide test site, and I may only have minor arguments as to why it should not be applied to the lake compared to what the LGPC considers a mandate given by the APA and the DEC, but I believe I have enough evidence and information for the LGPC, APA, DEC and state oil New York to hold off on the ProcellaCOR test application until more conclusive similar studies have been completed and analyzed.

My first issue is that there were clearly deceptive practices from the start while informing the residents directly involved with the test site. There was a letter sent to the community about 5 months before the planned application, but the small community surrounding the bay does not live there year round and many people didn't receive notice until with a few months before the planned application of ProcellaCOR. Furthermore, as you can see from my attached documents, the very short letter that was sent to us is very deceiving in terms of where the application was to take place. First of all, they had been testing the bay for the previous 2 years before the planned application date and no one bothered to inform us at that time. They could have sent letters much earlier, or they could have even come and knocked on our door or pulled up to our docks while they were doing their pre-testing. I had evened waved to the pre-testing folks from hour dock assuming they were people here to mechanically remove the milfoil for the past few decade, but unbeknownst to us, that had been stopped about 8 years previously. We were told it was due to the fact that it was considered an area of low significance and not worth the money for irradication, but due to the deceptive practices that I mention here and are apparent in my attatchment, I wonder if it wasn't the plan all along to stop removing millfoilf from this bay so that it could later be used as an herbicide test site.

Second, as I previously mentioned the LGPC referred to the bay as Sheep's Meadow

Bay which does not exist, though there is a Sheep's Meadow further down into Hulett's Landing, but no where close to our bay. So the mention in the letter and map about "Sheep's Meadow Bay" had no significance to our family.

Finally, in document 2 of my attached files it its clearly evident that the map was meant to be as unclear and nondescript as possible with detail left out so that upon first glance you can't even tell where this is. Hague is on the other side of the lake, even though I am now told the water off our dock is considered Hague. Also, all that blurry writing of street names is not from my upload. That is a high resolution photo I took of exactly what the letter that was sent to us looks like. It seems clear that the vagueness on the map was purposeful, because, as you can see from the rest of my my attachments, the maps from the LGPC application to the APA are very clear in their location designation. Had our family seen these maps that they could have easily sent us in the letter, we would have known exactly where the planned application of ProcellaCOR was to take place, but it is very apparent that it was the intention to avoid the local land owners from recognizing their own bay. Members of the LGPC would go on to say this was public record on the internet, but we knew nothing of the proposed plan on our bay and had no reason to try to look it up online, which would have been very difficult not knowing what you are looking for.

I know that this deception is not tantamount to unlawful practices nullifying the plan to treat the bay with ProcellaCOR, but as the LGPC and the ProcellaCOR company expect us to trust in many unknowns of this project (of which there are many), how can we expect to believe the information they are giving us is complete and irrefutable until further similar studies have occurred? This is my backyard, child swimming area, crop irrigation, drinnking water, not theirs.

Once we discovered it was our bay they they planned to use as their test site, I searched the LGPC website for previous board meetings and came to find out our neighbor, who is a board member and that has known the family for years, stated that he had talked to all of his neighbors involved in the testing area and he found no one in opposition, which in reality for a fact, he talked to very few neighbors in our bay (if any), and even came to events at our house during much of the time period that he knew of the ProcellaCOR plan and it's application location (including my mother in-law's memorial which took place a few feet from the proposed test site) and never mentioned a single word about the plan. Once again, this begs the question of how we are to trust in their assertions of ProcellaCOR as a "miracle cure for milfoil" when our own relatively close family acquaintance for decades didn't even ask us anything about it for 2 years while attending gatherings in our own home? I know that is more of a personal commentary, but it still supports my question of trust. I must remind you that there was no confusion on his part about our property bordering the test site because we own half the Bayfront of that site and his family has also been in the neighboring bay for over 100 years.

One point of contention is the term "test" site". At an LGPC forum meeting last year when I used the term "test site" with Dave Wick, he said it's already been tested and that it is actually a "demonstration site". However, not only are there numerous factor on Lake George that make it different from all other previous application sites, but

furthermore, the rest of the board members and other proponents of ProcellaCOR have used the term “test” hundreds of times, which brings me to all of my next points which I will try to state briefly.

Why can’t we wait until there are further studies on Florpyrauxifen-benzyl, especially on lakes similar to Lake George, which they have already begun, but only very recently. They say Lake Winnepesake has similar geological features to Lake George that are distinctly different from previous pond test sites, but that has only been under test and observation for a few years now and I’m not even sure if there is any clear constructions from that testing because I cantle find any.

We were tiold that Florpyrauxifen-benzyl will kill other species of plants in our bay, and their excuse is that those same plants exist in other part of the 30 mile Lake George shallow water zone. But why do we have to sacrifice these plants in our bay for this test?

Also, the label says it is not to be used in areas of swift moving waters, yet we have at least 3 streams that flow into that bay, and they move quite rapidly in June, so much so that I can watch a floating piece of debris move from 10 feet off our beach over 100 feet to the end of our bay in minutes. One reason why I say this is a “test” and not a "demonstration” is because it has mostly only been used on small shallow ponds for a relatively short history, and certainly nearly enough time to “test” it’s potential effects as an herbicide that could seeps into deeper parts of a larger lake where it cannot degrade.

ProcellaCOR's literature says that it degrades “relatively quickly” in 1-6 days up to about 20 ft; however, our bay drops to over 30 feet near the end of the bay, then quickly past that it drops to 80 feet soon after, much to deep for photolysis to break down the herbicide.

We were told by Dave Wick that they decided to stop spending money to mechanically remove ProcellaCOR in our bay many years ago because it was a bay of little importance. Then why is it so important to be used as their testing bay now. Also, he admitted at this same meeting that I attended in no uncertain terms that part of the reason this bay was chosen is because there are very few people living in this bay, and thus less potential of opposition.

As the label says, ProcellaCOR will likely have to be applied for years to come because it can’t possibly eliminate all milfoil from the lake, so now we are looking at indefinite herbicide use for decades?

Through scientific history there is evidence of many occasions where treating a weed with herbicide has led to creating a stronger more resistant strain of the weed, possibly making it harder to remove either chemically or mechanically in the future. I can site numerous examples, but a quick Google search will support my assertions.

One big reason touted as the potential miracle use of ProcellaCOR is that mechanical removal of milfoil is very expensive. However, when they add up the cost of

purchasing and applying ProcellaCOR, they do not include the long term cost of monitoring the affects it has on the lake, or even worse, the costs of having to mitigate affects that it has because we did not allow for enough time to test and examine the results. When you use experimental products to mitigate unwanted environmental impacts, you must also follow that with time and research that your methods aren't causing further harm, something this country has failed to do time and time again through industrial pollution. There are always hidden costs, and sure, if you keep them hidden you never have to pay for them.

Last but certainly not least, the Minnesota Department of Agriculture identified the treatment of ProcellaCOR as containing PFAS, considered a harmful forever chemical. Proponents for ProcellaCOR simply say Minnesota lowered the bar for what is considered a PFA, but once again I say, why should I trust them now without the time to show us the evidence. Certainly Minnesota didn't come to this reasoning simply to help us stop ProcellaCOR testing in our bay in Lake George. What is the rush? Why does it need to be done right now?

Finally, why is there the immediate need to test ProcellaCOR in Lake George right now when they are still conducting tests elsewhere, and only for the past 5 years, and only about 2 years on lakes similar to Lake George. Though it would be preferable to not have the invasive milfoil in our bay, for now it is preferable to being a testing ground for a relatively new herbicide that has extremely limited testing in similar test conditions. Please help us advocate for waiting until we have further conclusive tests completed and analyzed on similar sized and proportioned lakes. Lake George has never and should never be a testing ground for any chemical herbicide testing, and there is currently no eminent threat requiring that we take action right now.

Thank you for your time and consideration.

Sincerely,

David Rice
5235 Bluff Head Road
Huletts Landing, NY 12841
802-522-4847

From: Judy Dooley
To: APA Regulatory Programs Comments
Subject: Please NO ProcellaCOR in Lake George
Date: Wednesday, May 15, 2024 5:33:03 PM

To Whom it May Concern,

Please, please, please do not put ProcellaCOR in Lake George.

We have a house on Dunham's Bay. Our water comes directly from the lake as it has since the house was built in 1929. The water is clean and crystal clear. Please don't poison it.

Lake George is being constantly monitored. The lake is healthy. At this point there is no need to put ProcellaCOR in the lake. If there comes a time when it is absolutely necessary to apply ProcellaCOR to maintain the health of the lake, then we should revisit this idea.

Once the ProcellaCOR is applied, there is no turning back.

Please...NO ProcellaCOR in the lake!!!

Thank you.

Sincerely,

Judy Dooley

From:	Rose Wall
To:	APA Regulatory Programs Comments
Subject:	PLEASE STOP THE CONTAMINATION
Date:	Thursday, May 30, 2024 2:55:55 PM
Attachments:	C2_signature_veic_logo_100px_a3ba66c3-d0b7-4ee4-b9a2-a2f9c782f03c.png C2_signature_linkedinsquare_1a67eb70-f488-412d-a416-07de615e265b.png C2_signature_2021twitterlogo-blue_cc669654-125f-4c87-84ca-c19a664d6d22.png C2_signature_f_logo_rgb-blue_58_49c2704f-c649-4fcf-a8a5-491bdd4be07b.png

To whom this may concern,

Please, please, please do not try to eradicate Eurasian milfoil by dumping forever chemicals into our waterways that we live near, play in, and drink from. There are other solutions! We are begging you!! This will contaminate waterways for hundreds of miles in the watershed, not just the folks hyper locally on Lake George. Water moves all around and the contamination will be vast in the watershed!!!

New York has been a leader in seeking to keep PFAS out of water supplies, clothing, and food packaging. It is unthinkable that the same State of New York would intentionally introduce these compounds in Lake George.

I work for an environmental nonprofit and spend most of my time thinking about our future- from pollutants to climate change. PLEASE do not dump this forever chemical into Lake George, we beg you.
Thank you,
Rose Wall

Rose Wall (she/her)
Emerging Opportunities Manager

20 Winooski Falls Way, 5th Floor
Winooski, VT 05404
Tel: +1 802-540-7645 ¦ Cell: +1 802-498-8843

Let's make an impact together >

From: JANE BURLEIGH
To: APA Regulatory Programs Comments
Subject: Procella COR
Date: Wednesday, May 29, 2024 2:58:29 PM

I live on Lake George and I am opposed to putting Procella COR in Lake George. I'm concerned that it could have some negative consequences for children who swim in the lake .
Sent from my iPhone

From: SUSAN PHELPS
To: APA Regulatory Programs Comments
Subject: Procella in Lake George
Date: Thursday, May 30, 2024 10:22:58 PM

To whom it may concern,
I am a lake front home owner in Northern Lake George. I am against adding Procella into the lake. It’s unfair that those who may be negatively impacted by this chemical have no say in this process.
Sincerely,
Ed Phelps

From: Marc Usher
To: APA Regulatory Programs Comments
Subject: ProcellaCOR
Date: Wednesday, May 29, 2024 9:29:19 PM

The pilot application of ProcellaCOR in Lake George should proceed as planned. The threat of milfoil to the lake's health is much too great to allow well-positioned naysayers to negate years of scientific support for this approach. As someone who paddles Lake George often I urge the APA to support the Park Commission's plan. Thank you for your consideration. Marc Usher - Gansevoort, NY

From: Cheryl Baldwin
To: APA Regulatory Programs Comments
Subject: ProcellaCOR
Date: Monday, May 20, 2024 11:53:09 AM

Sent from my iPhone
Commission Aaron Ziemann:
Please do not allow the pesticide ProcellaCOR to be added to Lake George. My husband, William Baldwin, and I have owned our summer home on Dunhams Bay for 29 years. We are members of the Joshua's Rock Corporation. I, Cheryl Baldwin, am the recently retired , after 17 years service, President of the Dunhams Bay Association. I am still on the DBA Board. As you can see, we have a deeply rooted interest in Lake George. Our interests have always included our children and grandchildren and their love for the Lake. Keeping ProcellaCOR out or the Lake is our priority. There is no guarantee that ProcellaCOR does not cause cancer. Do not allow our beloved Lake to be a testing ground for cancer, etc.. We count on you to protect our precious Lake. Please don't let us down.
Thank you,
Cheryl and William Baldwin
24 Joshua Rock Road
Dunhams Bay
Late George , New York 12845

From: Carolyn Peterson
To: APA Regulatory Programs Comments
Subject: ProcellaCOR application for Lake George
Date: Thursday, May 30, 2024 9:40:58 PM

Dear APA agency board:

It appears that new understanding of the herbicide ProcellaCOR may show that it contains PFAs, a forever chemical that is harmful to humans and our drinking water. The application of this herbicide in Lake George is alarming because Eurasian watermilfoil can be controlled by other mechanical means, which is safer. This herbicide application warrants more study and understanding especially as it relates to PFAs and to the reputation of the pristine lakes in the Adirondacks. Please halt this application of herbicide.
Sincerely,
Carolyn Peterson
Keene, NY

From: Tom Jarrett
To: APA Regulatory Programs Comments
Subject: Procellacor Application in Lake George
Date: Thursday, May 30, 2024 9:18:45 AM

Dear APA,
I am a year round resident on Lake George, and I take water from the lake for domestic purposes. I have been following the LGPC application for the use of Procellacor on two sites in the lake in 2024, and I am in favor of the trial this year.

To date, I have come across no data that suggests significant adverse effects from Procellacor, and conversely, the data that I have perused has documented positive impacts with few to no negative ones. Although the use of chemicals, especially synthetic ones, should be done very, very cautiously, I think the research to date balances out in favor of a trial use in Lake George this year. That said, very close scrutiny should be provided, including very detailed testing for: 1) milfoil removal effectiveness, 2) impacts to water supplies, and 3) impacts to native flora and fauna. I would welcome a conditioned approval of the current application; the conditions being that intensive an extensive testing be completed, and that a written public report be prepared with the results.

Thanks, Tom Jarrett
3571 Echo Bay Lane
Katskill Bay NY 12844

From:	Margy Pote
To:	APA Regulatory Programs Comments
Subject:	ProcellaCor applications Lake George
Date:	Thursday, May 30, 2024 10:53:22 AM

Director of APA,
I am a homeowner located in Hague, directly across from Anthony's Nose & Blair's Bay.
I Strongly Object to the use of procellaCor in any part of Lake George, double A drinking water! Our family has and still does drink the LG water directly from the tap.
My mother, bless her soul lived to a ripe age of 92 & drank Lake George water, cooked with it, swam in it, showered in it, as we still do now!
The reasons we object to this Toxic chemical are listed below;

Lake George is Our only source of clean DoubleA drinking Water, as it is for thousands of homeowners. Also the thousands of tourists, campers, visitors, Children and babies who also drink the water, swim etc. We need to keep it free from toxic chemicals that are cancer causing!!

PFAs is a known ingredient in ProcellaCor! This is harmful to not only the ecosystem and fish in Lake George, but also a Human Health Hazard known to cause Cancer. Why knowingly poison a drinking water source such as Lake George??
State agencies claim to protect the lake!!
PFAs is a "forever chemical"that the human body cannot eliminate! Ask the Doctors!!

There is a summer kids camp located in Blair's Bay where chemical application is to be applied! Why would this be allowed?

The ProcellaCor use label states to be used in calm bodies of water (to avoid spreading chemical). Lake George is spring fed, has currents, and is anything, but a calm body of water!! Can attest to this living & growing up on it, it can be like the ocean many times!
LGPC claims it works in other lakes, however those lakes are calm & small, cannot even be Compared to Lake George! Also this chemical has spread to other parts of lake,

it doesn’t stay in one location!

Milfoil is not an emergency situation, it has
Been successfully removed by a chemical free hand harvesting method which the LGA
has paid for and offered to pay again at meeting 5/29/24 for these two proposed sites for “ trial application”!!
Why not use this method as it is not
harmful to ecosystems, fish and humans!??

Why not listen to We the people, the scientists, and the LGA that have continuously respected and protected one of the most beautiful and cleanest lakes in the world, Queen of Lakes...Lake George!

We respectfully ask that you will do the right
thing, withdraw these permits and STOP
this Environmental and Human Hazard from
entering Lake George!

Thank-You for your consideration,
Margery Pote

Sent from my iPhone

From:	Christopher Hudson
To:	APA Regulatory Programs Comments
Cc:	Christopher Hudson; Suzy Shad
Subject:	Procellacor in Lake George - No!
Date:	Tuesday, May 28, 2024 8:02:55 PM

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

No 'experiments' with our pristine lake, please.

Do you remember thalidomide from years ago? 'Perfectly safe, right?

Unintended consequences always happen.

If there were no alternative to reducing milfoil, it might be reasonable to consider it.

But current harvesting and mat methods do work..but those promoting Procellacor argue it's 'cheaper'. Bill shit without knowing the long term effects.

Most disturbing is Procellacor advocates saying it 'breaks down into harmless components'. This is a lie!

The breakdown components are indeed toxic and long lasting.

No Procellacor in Lake George. We have milfoil control methods that already work.

Best Regards,
C. A. Hudson
4307 Foster Brook Path
Huletts Landing, NY 12841
Cahudson42@gmaol.com
518-744-4720

From: Maura Jebb
To: APA Regulatory Programs Comments
Subject: ProcellaCOR in Lake George
Date: Wednesday, May 29, 2024 11:58:21 AM

Hello,

I OPPOSE putting ProcellaCOR, an herbicide, into Lake George.

This chemical ProcellaCOR was recently found to contain PFAS, "forever chemicals", by the MN Dept. of Agriculture and is simply too risky for drinking water.

Thank you,
Maura Jebb

From: hague3@yahoo.com
To: APA Regulatory Programs Comments
Subject: ProcellaCOR to control milfoil in Lake George
Date: Wednesday, May 29, 2024 2:23:46 PM

Hello. My name is Michael Strutz and I oppose the use of ProcellaCOR in Lake George. I am a resident of Hague, NY, live on the lake, and DRINK the water from the lake on a daily basis. This is a Class AA-Special water quality classification lake. Why in the world would you even think about granting a permit to spread herbicides in the lake? I am opposed to any chemicals for any reason IN MY DRINKING WATER!!!!!!!!! Are you also going to spread chemicals to control all the other aquatic invasive species like zebra mussels, Asian clams, spiny water fleas, etc.? PLEASE DON'T.

I attended the LGPC meeting yesterday, and I have a number of points that I would like you to consider...

1. The LGPC approved the resolution on ProcellaCOR BEFORE the public comment period. This is directly opposite to normal procedure where the vote is after comments have been heard. Wouldn't this make more sense? Nothing like having your mind already made up. They might as well say YOUR COMMENTS ARE NOT IMPORTANT TO US!

2. I am one of the 5,000 people who signed a petition opposing the use of ProcellaCOR. PLEASE LISTEN TO THE PEOPLE! We don't want this in our DRINKING WATER!

3. I am bothered by the fact that the LGPC is not taking the word of the LGA seriously. This is the best, most scientifically based, and well-funded lake associations in the country. PLEASE LISTEN TO THEM and work together. How much more money is going to be wasted on litigation to stop the use of this toxic chemical?

4. All of the town governments around the lake oppose the use of ProcellaCOR. PLEASE LISTEN TO THE PEOPLE!

5. It was recently brought to light that the breakdowns products of this chemical are classified as PFAS compounds, and potential carcinogens. Take the time to review the scientific studies on this issue. THERE IS NO RUSH!!! Wouldn't you like to know for sure that you are not dumping carcinogens in the lake! There is no major outcry on the problem of milfoil. TAKE TIME TO REVIEW THE SCIENCE COMPLETELY!

6. The examples of other lakes where ProcellaCOR was used are relatively small bodies of water, and where there was a severe nuisance milfoil problem, and where they are NOT USED FOR DRINKING WATER! Yes, the milfoil died. We get that. But there have been no long-term studies on the aftereffects. TAKE TIME TO GET BETTER DATA ON THE EFFECTS ON HUMAN HEALTH. I am happy that there have been no reported immediate toxic effects on plants and wildlife but it's not the whole story.

7. I am a college educated environmental scientist and former employee of the US EPA, and a cancer survivor. Who knows where in my past I was exposed to something that caused my cancer. It's a well-known fact that the majority of cancers are caused by what we eat, drink, and breathe. PLEASE DON'T ADD SOMETHING ELSE TO THE ENVIRONMENT THAT COULD CAUSE CANCER IN MY CHILDREN AND GRANDCHILDREN!

I am glad you are focusing on invasive species control but please take the time for due diligence in this case.

Sincerely,

Michael Strutz

From: Jamie W
To: APA Regulatory Programs Comments
Subject: ProcellaCOR use in Lake George
Date: Thursday, May 30, 2024 8:37:20 AM

Hello,

I am alarmed that the LGPC plans to use this herbicide containing PFAS chemicals in the lake. This will pose a life-threatening danger to humans as well as all of the wildlife in and around the lake. More info can be found here:
https://www.atsdr.cdc.gov/pfas/health-effects/index.html

I strongly urge the LGPC to find an alternative, keeping our water safe!

In good health,
Jamie Weekley

From: Jenny Arena
To: APA Regulatory Programs Comments
Subject: ProcellaCOR!
Date: Wednesday, May 29, 2024 5:52:36 PM

Hello, I am writing to state that I oppose ProcellaCOR being dumped in Lake George. This chemical is simply too risky for drinking water and swimming.
Thank you
Jenny Arena

From: Susan Lacy
To: APA Regulatory Programs Comments
Subject: Procellacor
Date: Wednesday, May 29, 2024 12:36:06 PM

Please immediately halt the use of this pesticide in Lake George (and potentially other ADK waters).

PFAS has only recently been discovered in Procellacor, previously thought to be a safe pesticide. This new information must be used to avoid a huge mistake, one that can't be undone.

Thank you,
Susan Lacy
Keene, NY

From: Kimberly Barton
To: APA Regulatory Programs Comments
Subject: ProcellaCOR
Date: Thursday, May 30, 2024 10:41:05 PM

Hello,
I am very opposed to the use of Procella COR in our beautiful Lake George waters. If it kills the milfoil, we know it will kill other precious aquatic life that has been protected for so long. I don't know why we are even considering taking this risk.
I have lived in Glens Falls since 1979 and grew up boating on our beautiful special lake and camping on LG islands as a child and now camp on the islands with my own children . I am very strongly against the use of the proposed chemical and I have serious concerns for its safety.
Respectfully,
Kim Rivers
Phone 518-796-3216

From: susan peters
To: APA Regulatory Programs Comments
Subject: PROCELLACOR
Date: Wednesday, May 29, 2024 5:30:29 PM

To whom it may concern:

I am a resident of Ticonderoga, NY and am strongly opposed to the application of this chemical, which contains PFA's, into Lake George.
Milfoil is not a crisis.
In my opinion and observation of the past 75 years of using/ being on the lake, is that the REAL problem is over-development and mis-use of Lake George:

---Landscaping right next to lake with use of herbicides/fertilizers, etc.
---Over-development of homes and docks along the lake---very LAX zoning.
---Poor, out-dated sewer systems.
---Over-sized motor vessels that are more appropriate on larger bodies of water.

Please address the ROOT of the problems, not just one "by-product"(milfoil) of what's been happening on Lake George.

Sincerely,

Susan Peters
235 Bull Rock Road
Ticonderoga, N.Y. 12883

From: Jane Lender
To: APA Regulatory Programs Comments
Subject: Procellacor
Date: Thursday, May 30, 2024 11:33:20 AM

To Whom It May Concern,

I fully support the use of ProcellaCOR in Lake George. I believe in the scientific studies and have researched this product extensively by reading about it, listening to the experts in many news pieces and radio interviews and researching it on the internet. I have listened to both sides of the story and ultimately feel that the LGA is doing the lake a disservice by spreading their misinformation campaign. I do not say this lightly because I do live on the lake and I would never want any harm to come to it but I feel that this application will help combat Eurasion milfoil that cannot be hand harvested, and in turn, help to keep our beautiful lake pristine.

Thank you,

Jane Lender

From: Kim Wick
To: APA Regulatory Programs Comments
Subject: ProcellaCOR
Date: Thursday, May 30, 2024 8:08:34 AM

As someone who has been following the "story" of ProcellaCOR very closely for the past few years, I believe it to be a positive tool to minimize Eurasian Water Milfoil in Lake George. Considering the rapidity of product breakdown, I have no concerns regarding drinking water or swimming in the pilot areas. What I have heard from other lake representatives such as Lake Luzerne, Lake Sunnyside, and Glen Lake ProcellaCOR has been beneficial in both the removal of milfoil and the rebound of native plants. Please approve the Lake George Park Commission's application.

Thank you,
Kimberly Wick

From: Patty Malmgren
To: APA Regulatory Programs Comments
Subject: Procellacor
Date: Sunday, May 26, 2024 2:13:26 PM

I object to the use of procellcor in Lake George as a homeowner at Huletts Landing.

Than you
Patricia Malmgren
927 County Rte 6
Huletts Landing NY
12841

From: Nancy Archer
To: APA Regulatory Programs Comments
Subject: ProcellaCOR
Date: Thursday, May 16, 2024 8:38:40 AM

Dear APA Board Members and Staff,

My family is a year round resident of Hague. Our home is directly opposite from Anthony's Nose and thus just north of Blair's Bay one of the proposed ProcellaCOR test sites. We are very concerned about the possible health and environmental effects of the use of ProcellaCOR in Lake George.

I swim daily from our house south to Forest Bay and often across the lake. This means I am in the water for long periods of time and frequently ingest lake water.

Because we live so close to the lake our garden is totally organic. We do not use any fertilizer, pesticides or herbicides. We are also investing in a new septic system at considerable expense to help protect Lake George.

We have read available information on ProcellaCOR including the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and we support the issues identified. We have concluded that there is insufficient evidence as to the long term effects of ProcellaCOR in a body of water such as Lake George. Hand harvesting of milfoil has kept the problem at bay successfully. I believe hand harvesting should continue and ProcellaCOR NOT be used until such time as conclusive evidence is available as to the effects of ProcellaCOR in Lake George.

Thalidomide is one of several examples of chemical usage once thought safe until further study concluded otherwise.

We know you are as concerned about protecting our lake as we are. Please allow additional study before ProcellaCOR is tested in Lake George.

Sincerely,

Nancy Archer, Brennan and Devin Clark

9657 Lakeshore Dr.

Hague

From: Gregory Hurley
To: APA Regulatory Programs Comments
Subject: Project 2023-0017 & 2023-0018
Date: Monday, May 27, 2024 7:07:39 PM

Dear Lake Protector,

I live at 981 County Route 6, Hulett's Landing, NY on Lake George.

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Water-keeper, and I support the issues identified therein.

Thank you for your help on stopping this procedure.

Gregory Hurley

From: Emma Hurley
To: APA Regulatory Programs Comments
Subject: Project 2023-0017 & 2023-0018
Date: Monday, May 27, 2024 8:36:17 PM

Dear Lake Protector,

I live at 981 County Route 6, Hulett's Landing, NY on Lake George.

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Water-keeper, and I support the issues identified therein.

Thank you for your help on stopping this procedure.

Emma Hurley

From: Lisa Hurley
To: APA Regulatory Programs Comments
Subject: Project 2023-0017 & 2023-0018
Date: Monday, May 27, 2024 9:10:49 PM

Dear Lake Protector,

I live at 981 County Route 6, Hulett's Landing, NY on Lake George.

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Water-keeper, and I support the issues identified therein.

Please stop this chemical from going into our beautiful lake. Lisa Hurley

From: Gina Jeckering
To: APA Regulatory Programs Comments
Subject: Project 2023-0017 and -0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 15, 2024 5:43:07 PM

Dear Mr. Ziemann,

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. My extended family of 16 are 4 month residents of Hague, NY and have been for 5 generations. Lake George is our family's number one most important place in the world. We treasure it and do our best to take care of "our" lake and its surroundings so that it is as wonderful for future generations as it has been for us all. We rely solely on the lake for our drinking, bathing, and cooking water in addition we swim in the lake all day long and eat the fish we catch on a regular basis. We have young children and pregnant women in the family and we are very concerned with the unknown long-term effects of pesticides on all of us. We also dearly treasure the wildlife at the lake and can only worry about ProcellaCOR will affect them and by default, the Adirondack Park.

From what I have come to understand, Milfoil is not in crisis on the lake and I want keep additives out of the water!!!

Sincerely,

Gina Jeckering

From: Patsy MacHardy
To: APA Regulatory Programs Comments
Subject: Project 2023-0017 for Sheep Meadow Bay or Project 2023-0018 for Blairs Bay
Date: Sunday, May 26, 2024 5:21:30 PM

Dear Aaron Ziemann,

Regarding Project 2023-0017 for Sheep Meadow Bay or Project 2023-0018 for Blairs Bay.

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. https://lakegeorgeassociation.org/sites/default/files/2024-02/02116_DEC_Waterkeeper_LGA_Objections_FINAL.pdf

My grandparents bought a cottage on Lake George 70 years ago. The lake was a pristine beauty amid the Adirondack mountains. I have been fortunate to share that home with my family. We all appreciate how the lake has remained clean and clear all these years. When I am in my kayak I can see the bottom of the lake each year. I have great pride in the way the LGA has managed to keep it so beautiful for all generations to enjoy.

I am a cancer survivor. I am well aware of the dangers of forever chemicals in our lives. There is not enough research on ProcellaCor to guarantee the safety of its use in our lake. I strongly object to the proposed use in Lake George. There are other non chemical methods to deter the growth of Milfoil.

Respectfully Yours,

Patsy MacHardy
Albert Way,
Huletts Landing, NY
802-236-4955

From: Al Haring
To: APA Regulatory Programs Comments
Subject: Project 2023-0017 Sheep Meadow Bay; Lake George Park Commission; Aaron Ziemann
Date: Monday, May 27, 2024 7:51:47 PM

4 Deer Run Way

PO Box 200

Huletts Landing,

NY 12841

May 27, 2024

Aaron Ziemann

Adirondack Park Agency

PO Box 99

Ray Brook, NY 12977

Re: Project 2023-0017 Sheep Meadow Bay

Project 2023-0018 Blairs Bay

Dear Mr. Ziemann,

I hereby object to the application of the herbicide ProcellaCOR in Lake George for the purpose of eradicating Eurasion Watermilfoil in Sheep Meadow Bay and Blairs Bay. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. In general, some of the issues include:

- All permit application requirements have not been met.

- ProcellaCOR is intended to be used in quiet and quiescent water bodies. Lake George is not such a water body. Based on research and data collected by the Jefferson Project over the past two years, there are significant horizontal and vertical water currents in the lake.

- Impacts to aquatic vegetation, benthic invertebrates and fish have not been adequately studied.

- There is a lack of knowledge about the long term effects of the herbicide.

I have been coming to Lake George for 74 years. My parents first brought me here to camp on the islands from New Jersey when I was 2 years old, and I've been coming to the lake every year since then. I purchased a house in Huletts Landing in 2003, and now drive up from Pennsylvania. It takes me 6 hours but this is where I want to be. My family and extended family enjoy swimming, water skiing, tubing and fishing, and eating the catch. These activities all involve absorption or ingestion of lake water. I have no desire to spend my summers anywhere else and we have a great community here in Huletts. I remain proud of how Lake George is one of the cleanest lakes in America, and would not want to see the natural resources within damaged by the application of ProcellaCOR in the lake.

Sincerely,

//Signed//

Alexander Haring

From: Paul Barrett
To: APA Regulatory Programs Comments
Subject: Project 2023-0017, project 2023-0018
Date: Thursday, May 16, 2024 5:30:31 PM

To whom it may concern:

I object in the strongest terms possible to the proposed addition of chemical agents to the waters of Lake George. I have come to the lake for over sixty years, was a full time resident for six of those years, and maintain a home on Basin Bay, to which I go whenever possible. I swim in the lake, and take in the water. My family swims in the lake and takes in the water. People drink from the lake. There are mechanical solutions to the milfoil problem which do not require chemicals at all. Please refrain from polluting the lake any further.

Yours,

Paul Barrett

From: Mike and Kathy Dier
To: APA Regulatory Programs Comments
Subject: Project 2023-0017, Project 2023-0018
Date: Thursday, May 30, 2024 12:17:32 PM

May 30, 2024

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

Dear Mr. Ziemann,

I am writing in support of the Lake George Park Commission's (LGPC) approach in considering a new method of treatment in Lake George by proposing the application of ProcellaCOR aquatic herbicide. I understand the treatment has received extensive review, and the scientific studies and relative feedback has led to Federal and NYS approvals for applying this herbicide.

I served on the board of the Lake George Association (LGA) for 2 six-year terms, with the last 3 years of service as the board President. During my time with the LGA, we prided ourselves on working collaboratively with the LGPC, ensuring that our joint efforts were for the overall benefit of Lake George. The discourse was respectful, and free flowing. We based our decisions on good public policy with scientific support.

I am not a scientist. I am fully aware of the reluctance to new and different. I am also familiar with the phrase, "not in my backyard." My assumption is the science must be of a magnitude and at a level of confidence that the concerns expressed by those opposed can be addressed accordingly. I cannot imagine government authorities would allow this herbicide to be applied to drinking water if it were unsafe. At some point we must rely on experts in their fields, or all progress will stall.

The benefit of volunteering at the LGA all those years was to be exposed to all the great people that work every day to protect the Queen of American Lakes. I fully understand the importance of considering all available tools to achieve important goals related to lake protection.

Sincerely,

Michael S. Dier
Past President
Lake George Association
37 Browns Path
Queensbury, NY 12804

From: Patti L
To: APA Regulatory Programs Comments
Subject: Project 2023-0017; 0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 15, 2024 8:14:36 PM

Greetings, I write in Objection to the use of a chemical in Lake George. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified in it.
Our family has owned a home on the lake since 1982.
Our parents chose it to preserve a serene and pristine place for future generations to gather and enjoy.
It was important to them and continues to be very important to us and our descendants that toxins like pesticides not be added to the water that we swim, fish, enjoy wildlife and play together in. It supplies the water we drink, cook and bathe with.
Toxins like ProcellaCOR pose an unacceptable threat to the water and surrounding nature.
That our lake takes precautions that others often don't is a big selling point that keeps Lake George the thriving, sought-after place it is.
Keep us unique in caring for the young, the infirm, the creatures and the future!
Thank you!

Respectfully,
Patricia Lancaster
for the Lancaster family

P.S. We have never experienced milfoil in Lake George.

From: Mike Kelly
To: APA Regulatory Programs Comments
Cc: Mike Kelly
Subject: Project 2023-0017; Project 2023-0018; Lake George Park Commission; Aaron Ziemann; ProcellaCOR usage in Lake George
Date: Wednesday, May 29, 2024 11:53:21 PM

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

Re: Any and all planned application of ProcellaCOR in Lake George in Sheep Meadow Bay or Blair's Bay.

Dear Mr. Zeimann and Adirondack Park Agency,

I am a seasonal resident of Lake George and a researcher in the field of limnology.

I adamantly oppose the use of ProcellaCOR in Lake George. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support and agree completely with the issues and points identified therein.

Additionally, I want to clarify the following points:

1. It is nonsense that eurasian watermilfoil (EWM) is in any way causing a crisis in Lake George. It is not causing an ecological crisis. It is not causing an economic crisis. The weed is presently being adequately managed through diver-assisted suction harvesting (DASH). The notion that the LGPC needs this as "just another tool in the toolbox" is completely disingenuous. I share in a very widespread sense that the community is being lied to on this point.
2. The notion that EWM in both Blair's Bay and Sheep Meadow Bay has been difficult to manage is comical. The LGPC has *chosen* to not take any action to control the plant in Blair's Bay ***since 2017***, and has *chosen* to not take any action to control the plant in Sheep Meadow Bay ***since 2014!*** And yet — ***and yet*** — the plant has not substantially spread in either bay since those now-long-ago harvest years.

1. The restrictions on the use of ProcellaCOR spelled out on its own label are not being followed. This is exhibited in the "dilution models" in each of the bays' applications. The ProcellaCOR label clearly states that it is only to be used, "for management of freshwater aquatic vegetation in slow-moving/quiescent waters

with little or no continuous outflow". **The application for Blair's Bay shows the planned "dilution zone" which includes the "treatment area" and shoreline that includes the inflow of Sucker Brook, a brook known to have hundreds to thousands of cubic feet of water per hour inflow into Lake George (i.e., into the defined "dilution zone" and directly over or through the "treatment area"), during the months of May and June.** ***Yet the dilution model in the application for Blair's Bay completely ignores this fact (yes, this is as incredible as it sounds). Indeed, that continuous inflow from Sucker brook NECESSARILY induces continuous outflow from the dilution zone, by the same amount. This is common sense and is mathematically and scientifically provable. And yet, the application completely ignores this fact. The product will be used off-label, which is a violation of federal law. This continuous flow through the dilution zone was exhibited by the Lake George Waterkeeper at a recent Town of Putnam Town Board meeting. Additionally, both bays show highly variable water movement in a recently published, peer-reviewed limnological journal.***

2. The recent preliminary determination by the Minnesota Department of Agriculture that florpyrauxifen-benzyl is a potential cancer causing PFAS "forever chemical" should *at least* put the application process on pause. Given that the weed is not presenting a crisis in the lake (it is not, as admitted by LGPC Executive Director Dave Wick), and that it can be reasonably managed with DASH harvesting (it can), ***it is unconscionable that the APA should even consider allowing the chemical to be applied in Lake George, a NYS Class AA-Special drinking water supply. Dumping this stuff in the lake without a thorough study and resolution of this matter would be beyond irresponsible.***

If the chemical is indeed safe and appropriate for Lake George, let that be proven one way or another; that is, let the present concerns be addressed through adjudication and whatever further scientific study is necessary. Without a present crisis, there is no logical rationale to allow for the deposition of a potential carcinogen into thousands of people's drinking water. The old notion that the "solution to pollution is dilution" doesn't cut it. Nobody that I know wants their kids drinking even a "diluted" drop. State agencies jamming unwanted policy down the throats of the community, all to get a "new tool in the management toolbox" that is not necessary and very potentially dangerous makes absolutely no sense. This matter should be adjudicated in a proper and deliberate manner.

Please deny the application for the usage of ProcellaCOR in Lake George.

Sincerely,

Mike Kelly

From: dhc0107@fastmail.fm
To: APA Regulatory Programs Comments; rmf1956@yahoo.com
Subject: Project 2023-0017:Lake George Park Commission; Aaron Ziemann
Date: Thursday, May 23, 2024 3:52:10 PM

Dear Mr. Ziemann,

We are writing to register our objection to using the chemical ProcellaCOR in Lake George in Projects 2023-0017 Sheep Meadow Bay and Project 2023-0018 Blairs Bay. We have read the February 16, 2024 Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper and we support the issues identified therein.

Rosemary is a long time (52 years) landowner of property on Cleverdale and David has been visiting the Lake for 34 years. We, and our extended family, now 4 generations, greatly enjoy Lake George each year. We often host friends at the cottage. All who come to the lake enjoy swimming, water sports, and abundant wildlife. We also make use of the many services in the area supporting the Lake George economy.

We are concerned that ProcellaCOR is classified as moderately toxic because we use lake water for cooking, cleaning, showering and drinking. In hot summer days it is impossible to not ingest lake water while swimming. In addition, we have members of our family with pre-existing conditions and very small children who may be more adversely affected by the chemical. We are also concerned with the lack of knowledge of long term effects of the pesticide. There are myriad example of chemicals deemed "safe" only to be found out later that they are "unsafe". Look no further than to the changing interpretation of human health risks from perfluorinated compounds (PFCs). Lastly, and from a macroeconomic point of view, Lake George is renowned for its purity and we are concerned that putting chemicals in the lake will mean lost tourist income to the region as vacationers will choose a lake that doesn't use aquatic herbicides in it.

Respectfully,

David H. Campbell and Jennifer F. Campbell
Leyden, Massachusetts and Cleverdale, NY

Rosemary M. Faulkner
Niskayuna, New York and Cleverdale, NY

From: steamsrising@gmail.com
To: APA Regulatory Programs Comments
Subject: Project 2023-0018 Lake George Park Commission Asron Ziemann
Date: Tuesday, May 28, 2024 4:31:57 PM
Attachments: image001.png
image002.png

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

APA Project 2023-0018
Lake George Park Commission
Blair's Bay
Lake George
Hague, NY

May 28, 2024

Dear Mr. Ziemann,

I write in support of the Lake George Park Commission's (LGPC) permit application for the use of ProcellaCOR for the control of the obnoxious invasive species, Eurasian Milfoil. The aquatic weed is a plague that often washes ashore on our beach making it most unpleasant for swimming. Further this weed has made several of my favorite fishing locations unfishable due to its heavy concentrations. When Fall arrives the biomass of the milfoil rots adding unnecessarily to the biochemical oxygen demand in deeper waters. Hand harvesting is expensive and certainly not very effective.

Prior to reaching the conclusion that the LGPC should proceed with the ProcellaCOR treatment, I have reviewed the USEPA's extensive record developed to approve the use. The USEPA concluded:

> "Florpyrauxifen-benzyl is not genotoxic and there were no treatment related findings up to the limit dose (1,000 milligrams/kilogram (mg/kg)/day) or highest doses tested in the acute, short-term, sub-chronic, or chronic oral toxicity studies, 2-generation reproduction or developmental toxicity studies or in the neurotoxicity study.
>
> Chronic administration of florpyrauxifen-benzyl did not show any carcinogenicity potential and did not cause any adverse effects in mice, rats or dogs even up to the highest doses tested."
>
> "EPA has not found florpyrauxifen-benzyl to share a common mechanism of

toxicity with any other substances, and florpyrauxifen-benzyl does not appear to produce a toxic metabolite produced by other substances."

"Based on the information in this preamble and the supporting documentation, EPA concludes that there is a reasonable certainty of no harm from aggregate exposure to florpyrauxifen-benzyl residue"

NYS Department of Health has also added to the criteria for acceptable use of ProcellaCOR with its own label.

The NYSDEC will establish a final set of conditions for the use of ProcellaCOR for this project.

In consideration of the work of the dedicated scientists of the Federal and State regulatory agencies cited here as well as their colleagues in 48 states, Canada, and the European Union and the extensive record they have produced, I do not find any scientifically supported evidence for the claims unfortunately brought forth by the Lake George Association (LGA) et. al. as recorded in their letter of objection and more recent releases raising cancer risks.

In particular, the LGA asserts that they have data that proves currents and flow vectors will act to dilute the ProcellaCOR rendering it ineffective or in the alternative enhancing the growth of milfoil. More recent research of authors cited by the LGA clearly demonstrates the active ingredient of ProcellaCOR has proven to be effective at doses similar to those proposed by LGPC with very brief exposure times.

Howell et. Al.
"In a small-scale CET study, Mudge et al. (2021) noted Eurasian watermilfoil was completely controlled 5 WAT following subsurface florpyrauxifen-benzyl applications of 3, 6, or 9 µg a.i. L^{-1} at 0.5, 1, or 3 hr exposure times."

Mudge et.al.
Efficacy of Florpyrauxifen-Benzyl on Diecious Hydrilla and Hybrid Water Milfoil Concentration and Exposure Time Requirements
US Army Corps of Engineers
ERDC/EL TR-21-8 September 2021
https://apps.dtic.mil/sti/pdfs/AD1148392.pdf
"… excellent hybrid watermilfoil control can be achieved on young plants with florpyrauxifen-benzyl at 3 µg a.i. L-1 if herbicide exposure is maintained for at least 4 hr.
In scenarios where exposure time is limited to less than 4 hr, higher doses (for example, 6 µg a.i. L-1) can provide excellent control if herbicide concentrations are maintained for ≥0.5 hr. F"

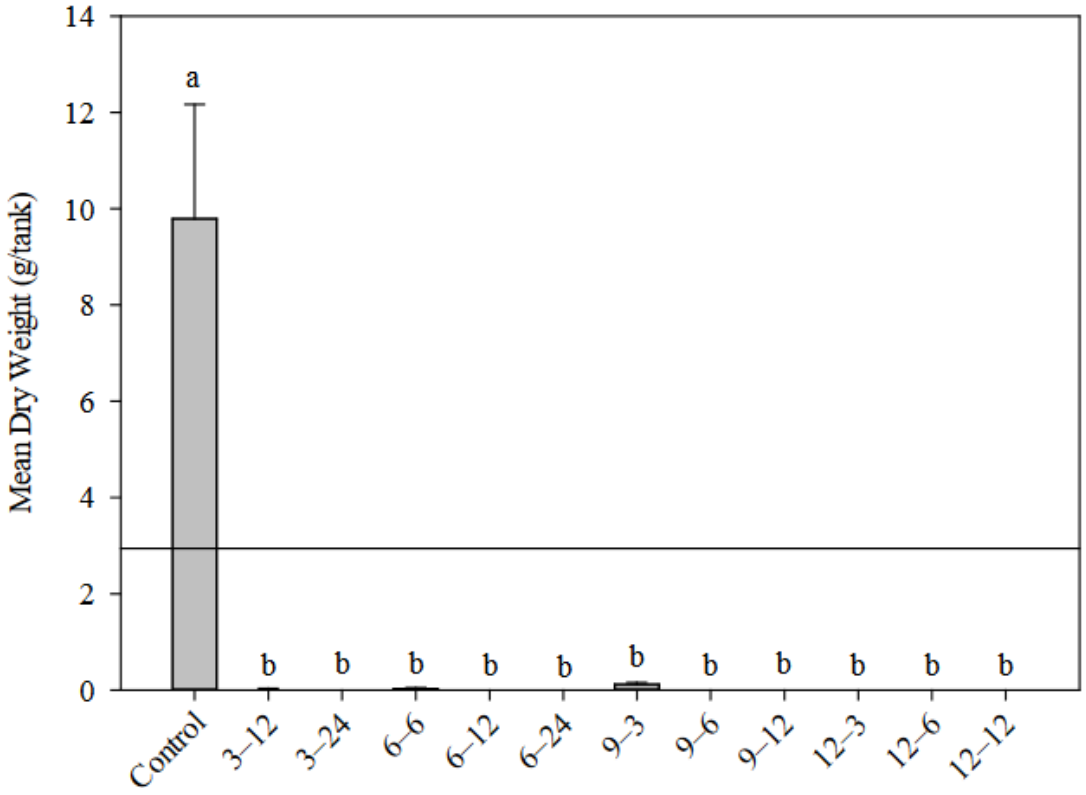
With respect to the issue of Hormesis raised by LGA, I would note that their cited source, Mudge speculates that is may be an issue and then conducts additional work that demonstrates there is no effect. The previous work

referred to by Mudge used 2,4 D not florpyrauxifen-benzyl.

https://bioone.org/journals/invasive-plant-science-and-management/volume-15/issue-3/inp.2022.22/Susceptibility-of-native-and-invasive-submersed-plants-in-New-Zealand/10.1017/inp.2022.22.full

"Hormesis was noted in a previous study that documented a stimulated increase in yield for *E. densa* treated with the auxin herbicide, 2,4-D, applied at 1 to 11 mg ai L^{-1} (Peres et al. 2017)."

Figure 3. Mean dry weight (g ± SE) response of hybrid watermilfoil 8 WAT with subsurface applications of florpyrauxifen-benzyl in an outdoor mesocosm setting. Numbers behind herbicide concentrations (µg a.i. L^{-1}) represent exposure time (hr). Horizontal line represents pretreatment biomass. Treatments with the same letter are not significant according to Fisher's Protected LSD (α= 0.05, n = 4).



Efficacy of Florpyrauxifen-benzyl for Eurasian Watermilfoil Control and Nontarget Illinois Pondweed, Elodea, and Coontail Response
ERDC/TN ARCRP CC-24 September 2021
https://erdc-library.erdc.dren.mil/jspui/bitstream/11681/42063/1/ERDC-TN%20APCRP-CC-24.pdf

I find it unfortunate that LGA has referred to Jefferson Project research and peer

reviewed articles researching currents and flows in the subject areas that are not readily accessible to the public.

The LGA cites a graduates students work to raise questions about the degradation of ProcellaCOR as studied in several Wisconsin Lakes.

> Van Frost, Sydney R. 2023. Characterizing the Environmental Fate of Aquatic Herbicides by Connecting Quantification in Lakes to Laboratory Studies. Thesis to University of Wisconsin – Madison.

While the work of Van Frost is interesting, more importantly it is clear there are several effective mechanisms that lead to the complete degradation of ProcellaCOR as reported in Figure A.20 shown below

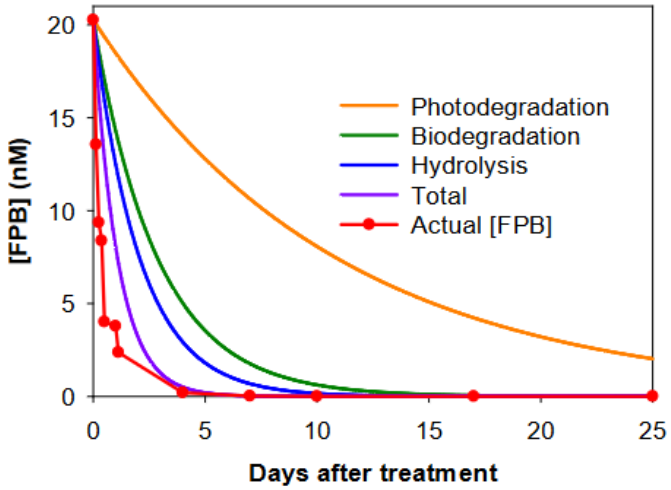


Figure A.20. Modeling results of first-order kinetics compared with measured epilimnion concentrations of FPB in Kettle Moraine Lake.

I was born and raised at Sabbath Day Point just across the Lake from Sheeps Meadow Bay where I have had many occasions to swim, fish, and work over time. The growth of milfoil there is most obnoxious, and it is overdue for our government to take action to effectively and safely control the milfoil.

Today we reside in Hague across the Lake from Blair's Bay where we often cruise and visit. It is most unfortunate that this bay had also been allowed to become infested with milfoil. Let's get a move on and treat it now.

Respectfully submitted,
Peter Carney
9193 Lakeshore Dr.
Hague, NY 12836
steamsrising@gmail.com

From: Sharon and Brian Hughes
To: APA Regulatory Programs Comments
Subject: Project 2023-0018 Lake George Park Commission Aaron Ziemann
Date: Thursday, May 30, 2024 12:02:58 PM

This is to comment on the projected use of Procella in Blair's Bay in Lake George, NY. Brian's family is a 5 generation family who has enjoyed Lake George, and Sharon's is a 4 generation family enjoying the lake. Needless to say, Lake George is extremely special to us and protecting it and its beautiful waters will always be important to us and our family. We understand all agencies just want the best for the lake. However, it seems to us that applying a pesticide that has the possibility of harming the lake and may contain PFAs is not something we would like to see happen at this time. More long term information is needed. We also understand that Lake George is a different environment than some of the lakes it has been used on (those of which we still don't know long term effects).
The LGA has offered to hand harvest these bays for at least 2 years. We ask you to please hold off on the herbicide for at least these 2 years till more info is available. Thank you so much for your attention to this matter and for all of your hard work. Time may be just the thing needed right now.

Sincerely,
Brian and Sharon Hughes
15 Juracka Parkway
Rotterdam, NY 12306

From: Judy's Email
To: APA Regulatory Programs Comments
Subject: Project 2023-0018 Lake George Park Commission, Aaron Ziemann
Date: Wednesday, May 29, 2024 10:17:07 AM

I am writing to support the issues that the Lake George Association and the Lake George Waterkeeper have identified in their Objection Letter to the DEC regarding the use of ProcellaCOR in our lake.

Our family has had a home on the lake in Hague, NY since 1933 and we are in our fifth generation. The only summers that the family missed going to the lake were during WWII. The lake is still our only source of water for drinking, cooking, bathing,etc and, of course, we all love to swim in the lake and feel comfortable doing that. Our house is directly across from Blairs Bay.

I don't understand why anyone would consider applying a dangerous pesticide to Lake George, one of the cleanest lakes in the country, when there are other safe methods of treating the milfoil. To my knowledge, no tests have been performed on our lake that would verify our safety and the safety of the lake. Lake George can be wild at times and no one can guarantee that this pesticide will not spread far and wide.

Not only do we have a deep love of the lake but we have invested much time and financial resources through the years to be responsible stewards of Lake George.

PLEASE reconsider your approach to immediate treatment of any milfoil and take the time needed to perform adequate tests on our lake…or, for that matter, any body of water.

Most sincerely,
Judy Taylor

Sent from my iPad

From: mattnovak@roadrunner.com
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission, Aaron Ziemann
Date: Tuesday, May 28, 2024 5:11:11 PM

Hello Mr. Ziemann,

I am writing as a local resident of the Lake George region, boater, fisherman and concerned citizen regarding the application of ProcelaCOR EC to control Eurasian watermilfoil in Lake George, the Queen of American Lakes. I am concerned about the unknown and long-term effects of PFAS and forever chemicals. Lake George is considered to be one of the cleanest and clearest lakes not just in NY or the USA but in the World. Many people to this day receive their drinking water from Lake George. Warren County and the Lake George Region draw an average eight million visitors a year and economic activity tied directly to Lake George is estimated to be worth in excess of $2 billion annually. As a local business owner and a resident I think the introduction of this chemical is extremely dangerous and could have potentially irreversible effects. It is not necessary as the planned locations for the chemicals are relatively isolated and could be better managed with manual harvest operations. Lake George has an excellent naturally reproducing population of lake trout and salmon. Brook trout can also be found at the mouth of many of the lakes tributaries. Lake George also ranks among the top five bass fishing destinations in New York State. The lake is a tremendous natural resource that should not be subject to the unknown and irreversible effects of this chemical application.

Thank you,

Matt Novak
11 Willow Rd
Queensbury, VT 12804
802-233-2962

From: Helen Rosselli
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Thursday, May 16, 2024 9:13:56 AM

Dear Aaron,

My family and I DO NOT SUPPORT the use of ProcellaCOR anywhere in Lake George or its watershed, including Project 2023-0018 for Blairs Bay.

We love Lake George because of its pristine water quality and beauty. We live at 92 Sabbath Day Point Rd, Silver Bay (Hague) NY for 25 years. Prior to that, my husband had been spending summers at Silver Bay YMCA since he was a baby in the 1960's.

Lake George is our sole source of water for our home, and it is our drinking water. We swim in and eat fish out of the lake. We love boating and look for Bald Eagles and Loons that live nearby.

As a biology/environmental science major in college, I understand the toxic effects of chemicals in this ecosystem. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein.

https://lakegeorgeassociation.org/sites/default/files/2024-02/02116_DEC_Waterkeeper_LGA_Objections_FINAL.pdf

Please do NOT use ProcellaCOR in Lake George. There is lack of knowledge around long-term effects of the pesticide to humans and wildlife. There are other, non-toxic successful alternative ways to control invasive aquatic weeds.

Thank you for your consideration, Helen Rosselli

HELEN ROSSELLI
203-581-0111 cell

Norwex Independant Consultant "Sharing a cleaner, safer way of living by reducing harmful chemicals in everyday lives."
norwex.com/helenrosselli

From: Karen Bartlett
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 15, 2024 3:06:46 PM

Hello Aaron,

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. https://lakegeorgeassociation.org/sites/default/files/2024-02/02116_DEC_Waterkeeper_LGA_Objections_FINAL.pdf

In 1946 my grandparents built a cabin in Hague, directly across from Blair's Bay. My family continues to crowd into this cabin and spend most of the summer in and around the lake: swimming, sailing, hiking and gardening. My mother, brother, husband, children, nieces and nephews and extended family also do the same. We count on the lake as a safe source of drinking water and for recreation. We are strongly opposed to the use of ProcellaCOR in Lake George. I am very concerned that it is considered "mildly toxic" for all of our family members, pets and other wildlife that would be exposed to this chemical without our consent. There is lack of knowledge about the long term effects of this chemical pesticide. There is no reason why one of the cleanest bodies of water in the country should be the testing ground for a chemical that has not been widely tested. I spend a lot of time around the lake in Hague and have yet to see any area that is being negatively impacted by milfoil in a way that hampers recreation/use of the lake. And yet, we are preparing to use a chemical that could very well damage wildlife, ecosystems and the people in the watershed. The mission of the Park Commission is to "preserve the natural resources of the lake especially its superior water quality." I am really confused and dismayed to think that you consider the use of ProcellaCOR to be within your mission. Where is this offending milfoil in Blairs Bay and who is pushing you to do this?

Thank you for considering my comments,
Karen Engler Bartlett

From: Keith Ferguson
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Thursday, May 16, 2024 6:55:39 PM

Aaron,

Please include the below comments in the upcoming APA meeting regarding the use or ProcellaCOR in Lake George.

Dear APA Board Members,

I am writing as a property owner and life-time summer resident of Bolton Landing to express my opposition to the use of ProcellaCOR.

Simply, unlike other lakes in the area, Eurasian watermilfoil is not an existential threat to Lake George at this time. It has been managed using physical methods for nearly 40 years since it was first detected in 1986.

While I appreciate the efforts by the Lake George Park Commission to find more effective and cheaper solutions, the truth is that New York State has an unfortunate history of allowing chemicals to enter into its waterbodies, only to regret it later. The fact that Minnesota has recently determined that PFAS are in ProcellaCOR highlights the unknowns, and, at a minimum, warrants a further investigation.

Given that milfoil is being managed effectively in Lake George today without chemicals, what is the harm in waiting to truly ascertain there are no adverse side effects?

Thank you for your time and consideration.

Keith Ferguson
29 Willetts Road
Mount Kisco, NY 10549

Summers: Bolton Landing, NY

From: Doug Noordsy
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 15, 2024 3:39:35 PM

Please do not use Procellacor in Lake George.

Douglas Noordsy
Silver Bay NY

From:	Shannon O"Toole
To:	APA Regulatory Programs Comments
Subject:	Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date:	Friday, May 17, 2024 7:05:58 AM

NO to adding toxic ProcellaCor chemical into Lake George waters!

From: Sally Thurston
To: APA Regulatory Programs Comments
Cc: Sally (Mommy) Thurston; sallythurston2@gmail.com
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 22, 2024 4:54:11 PM

Dear Mr. Ziemann,

I am writing urgently to request that you deny the Lake George Park Commission's applications to use the chemical pesticide ProcellaCOR in Blair's Bay and Sheep Meadow Bay to treat Eurasian watermilfoil in those bays. Lake George is a natural wonder, a pristine and magical water, and supports a $2 billion local economy that we simply cannot afford to jeopardize through short-sighted and unnecessary actions.

I grew up in Queensbury and boated on the lake throughout my childhood, picnicking and camping on the islands. I now own a home in Hague directly across the lake from Blair's Bay; my children and I swim, kayak and waterski in that bay frequently, along with many other lake lovers and the happy kids at Adirondack Camp, which is at the tip of the south end of the bay.

Blair's Bay is anything but slow-moving and quiescent with little or no continuous outflow, as the ProcellaCOR label requires. I am deeply troubled with the thought that a pesticide could be put into that bay, and with the unrealistic expectation by the Lake George Park Commission that it will remain in the dilution zone, disappear rapidly and not adversely affect native species upon which the delicate ecological balance of Lake George depends. There is no ability to control ProcellaCOR once it goes in the water; to think otherwise is pure folly.

While I am a member of the board of the Lake George Association, I have been fighting the potential application of ProcellaCOR since before I joined the board. I whole-heartedly support the February 16, 2024 Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and am very familiar with the evolving science outlined in that letter. Moreover, I have grave concerns about the recent finding by the Minnesota Department of Agriculture that ProcellaCOR contains PFAS.

The Lake George Park Commission is charged with protecting the Lake and purports to follow the science; I simply cannot fathom why they continue to press this issue in light of the scientific evidence that is emerging and the overwhelming public opposition

against ProcellaCOR's use.

Lake George is too precious to take these risks. There is good reason why there has never been a chemical treatment in its waters. And we should all remember that the EPA has been wrong on more than one occasion -- one need only recall what happened with DDT, or Roundup, to understand what could happen here.

Please deny the applications.

Thank you,

Sally Thurston

PO Box 594

Hague, New York 12836

From: Richard F Kingsbury
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 15, 2024 6:08:17 PM

(2023-0017 references ProcellaCOR application in Sheep Meadow Bay; 2023-0018 references ProcellaCOR application in Blairs Bay)

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein.
https://lakegeorgeassociation.org/sites/default/files/2024-02/02116_DEC_Waterkeeper_LGA_Objections_FINAL.pdf

I have been coming to Lake George snce 1948 and I am now retired and spend my entire summer here. We drink the water which we do not want to be poisoned by your actions regarding millfoil. We entertain babies here as young as 2 and we ourselves are in our 80's. I understand the lake waterkeeper is oposed to this effort. Why have an advisor and then ignor him?
Why too, are you planning to violate the use instructions of the poison being planned for use? Lake George is a Natonal tgteasure and does not deserve to be contaminated to solve an imagined problem. Miloil, while a pest, does not warrent this attack on the lake. I hope the use of ProcellaCOR is cancelled forever.

Regards, Richard Kingsbury
42 Forest Bay Rd N
Hague NY 12836

From: Stu Cartwright
To: APA Regulatory Programs Comments
Cc: stucartwright@yahoo.com
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 15, 2024 9:57:34 PM

I am a 3rd generation Lake George resident, my children are 4th generation. My grandfather built a camp at Friends Point in the late 1940s. My mother and father purchased property on Friends Point directly across from Blairs Bay in 1966. I have been a Lake George swimmer for over sixty years.

I continue to swim in, cook with and drink the waters of Lake George.

STOP THE MADNESS. DO NOT POISON THESE PRISTINE WATERS WITH CHEMICAL HERBICIDE.

Listen to the limnologist. Listen to the Lake George WaterKeeper. Listen to the towns that dwell on the shores of Lake George that have come out and voted against the application of this very new chemical. Listen to the taxpayers, the businesses, the town boards, the lake protection associations, and the summer dwellers who love Lake George and are longtime stewards of the Queen of American Lakes. How can such prolific public outcry from those closest to the water be casually dismissed or ignored?

David Wick and the LGPC have done a marvelous job regulating and instigating inspections of old, failing septic systems in the Lake George Basin. We commend these successes. However, this same organization is on the WRONG side of the ProcellaCOR debate.

Has no one read Rachel Carson? Has no one read the news reports from Flint Michigan (an unmitigated water disaster on the watch of the EPA.) Do we not in the twenty-first century understand that quick, easy, promising, man-made solutions are often precariously detrimental to nature's pristine systems? That unintended consequences are easily unforeseen? "Contergan" was a promising solution, too, yes? Look up that result.

In an age where technology provides deep understanding of eco-systems large and minute, where IBM supercomputers are just beginning to unveil new secrets beneath Lake George's whitecap waves, how can further study not be undertaken to ensure the long-term safety of our lake?

Common sense says "Wait," and "Study." Don't let the short-term financial benefit to a government agency dictate current action. Give the limnologists, the Jefferson supercomputers, the WaterKeepers time to look more deeply into ramifications of putting plant-killing toxins into Lake George. Until very recently, we didn't know Lake George has an "underwater river" or what was a "seiche." Right now, the supercomputers of the Jefferson Project, the scientists at RPI and elsewhere, the Darrin Freshwater Institute, and ecologists at lakes around the world stand at the precipice of unprecedented knowledge of lake systems. There is so much more that we can learn and know in coming years.

Don't put the lake, from the tiniest micro-organisms to the most precious future generations of our children be put at risk. Don't let the chemical salesmen dictate the chemical makeup of Lake George.

STOP THE PROCELLACOR RUSH. PLEASE.

Sincerely,
Stuart Cartwright

Friends Point
Hague, NY 12836

From: Jerry Stoecker
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 29, 2024 8:19:29 AM

To Whom it may concern,

I have read the February 16th, 2024, objection letter to the DEC from the Lake George Association and the Lake George Water Keeper, and I support the issues identified therein.

My family has been vacationing at Lake George since the 1950's, and have owned a home in Huletts Landing since the early 1960's. I have spent every Summer of my life at the lake and so have my children. We have enjoyed the pristine waters of Lake George, and it would be a catastrophe to introduce a forever chemical into those waters. PorcellaCOR is a poison and should never be allowed into these waters. This poison has very little history, and once introduced into the Lake, it will be there FOREVER! This must not be allowed. Many people on the lake still used this water as their main water supply, so introduction of this dangerous chemical into the lake is intentionally poisoning them. This is a very fragile ecosystem, and dumping this hazardous chemical into Lake George will alter and ultimately destroy this beautiful natural wonder.

I know that I am 1 of many, and the majority of people that are invested in Lake George are opposed to this. This agenda is being pushed by people who are clearly not invested in this community. We beg of you to hold off on this treatment until many more years of testing can be done. This tremendous mistake CANNOT BE UNDONE!

Sincerely,
Peter Stoecker

From: william creighton
To: APA Regulatory Programs Comments
Cc: Nancy Hawley; Peter Menzies
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Sunday, May 19, 2024 11:23:51 AM

Dear APA,

My family has been enjoying the beauty of Lake George and its high quality water since 1898.

I urge you to reject the application of the Lake George Park Commission to use ProcellaCor to control milfoil in Lake George.

With help from its partners, the Park Commission is already successfully controlling milfoil expansion in the Lake through hand-harvesting. We can continue to do so without taking the risks associated with ProcellaCor.

ProcellaCor has been in wide use for only a few years. This is not enough time to clearly understand its impact on water bodies. I favor waiting until the science is clearer on the long term impacts of ProcellaCor.

The ProcellaCor label calls for its use in quiescent waters. As a recent peer-reviewed scientific study points out, Lake George is not quiescent. Its currents, stream inflows and wind create conditions that will cause any ProcellaCor introduced into the Lake in bays to migrate into the main lake. If ProcellaCor should be used in quiescent waters, Lake George is the wrong place for it.

Environmental history is replete with examples of chemical applications causing unintended consequences. Why not pause the plan to introduce this chemical until we have far more information on the impact of ProcellaCor on native plants, fish and animals and get to the bottom of the "quiescent waters" issue. We don't have a crisis and we should not act like we do have a crisis.

Sincerely,

William Creighton
1833 Pilot Knob Rd
Kattskill Bay, NY 12844

From:	Andrew Rottier
To:	APA Regulatory Programs Comments
Subject:	Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date:	Friday, May 17, 2024 3:53:32 AM

Hello,

As a lifelong resident of the lake, and 3rd generation family of the Lake George community, I strongly oppose use of herbicide (or any chemicals) in or adjacent to the lake. The short term and long term side effects of such chemicals both on our bodies and in our drinking water will have irreversible effects our our health.

I literally have this lake tattooed on me. I'm am as much apart of the lake community as the lake is part of me. Even proposing this is in direct violation of the rights of every single member of the community.

We say no to herbicides and chemicals usage, for any reason, in or around the lake.

Thanks,
Andrew Rottier

Sent from my iPhone

From: Chris Golub
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Thursday, May 16, 2024 10:46:17 AM

Good Day -

Writing in support of the Feb 16, 2024 objection letter to the DEC from the LGA and LkG Waterkeeper.

As a longtime resident of Basin Bay, where my family has called home for over 25 years, I understand the integral role Lake George plays in the fabric of our community and the surrounding area. Its pristine waters are not only a source of recreation but also a vital component of our local ecosystem, supporting diverse wildlife and sustaining our way of life.

The proposal to introduce ProcellaCOR, a chemical classified as moderately toxic, into Lake George raises grave concerns about the potential impact on human health, the environment, and our local economy. Our lake is not just a scenic backdrop; it's the heart of our community, enriching our lives and providing essential resources for residents and visitors alike.

The use of ProcellaCOR poses a significant threat to the delicate balance of our ecosystem. Unintended harm to unsuspecting wildlife, such as turtles, ducks, and otters, cannot be ignored. Additionally, the introduction of a chemical with uncertain long-term effects jeopardizes the very essence of what makes Lake George a sought-after destination for tourists and residents alike. The potential loss of tourist income and reputational damage could have far-reaching economic consequences, affecting property values and livelihoods.

Furthermore, there are legitimate concerns about the chemicals application and effectiveness. Milfoil, the purported target of ProcellaCOR, is not a significant problem on Lake George, rendering the need for such drastic measures questionable.

As stewards of Lake George, it is our responsibility to prioritize sustainable and holistic approaches to lake management that safeguard the health and well-being of current and future generations. We must reject the use of harmful chemicals and instead invest in solutions that uphold the integrity of our precious water resources.

--

Chris Golub
917.282.8354

From: Gendron, Gardner
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Thursday, May 16, 2024 9:12:29 PM

Hello NYS,

I am writing to express my strong opposition to the **proposed use of Procellacor in Lake George**. As a long-time resident of this beautiful area, I am deeply concerned about the potential environmental and health impacts of introducing this chemical into our lake.

Recently, the Minnesota Department of Agriculture identified florpyrauxifen-benzyl, the active ingredient in Procellacor, as a pesticide that contains PFAS (per- and polyfluoroalkyl substances). PFAS are known to be persistent in the environment and have been linked to various adverse health effects. The introduction of such a substance into Lake George could have long-lasting negative impacts on our water quality, wildlife, and overall ecosystem.

Lake George is a precious natural resource that requires our utmost care and protection. I urge you to reconsider the use of Procellacor and explore alternative, non-chemical methods for managing the lake's aquatic vegetation. It is crucial that we prioritize the health and safety of our environment and community.

Thank you for your attention to this matter. I hope you will take my concerns, and those of other residents who cherish Lake George, into serious consideration.

Please send a response!

Sincerely,

Gardner

From: EJ Salamone
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Wednesday, May 15, 2024 3:03:35 PM

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. https://lakegeorgeassociation.org/sites/default/files/2024-02/02116_DEC_Waterkeeper_LGA_Objections_FINAL.pdf

I grew up visiting Lake George and have been a full time resident for 10 years. I am deeply concerned about swimming in the lake, ingesting the lake, other environmental impacts, and also the economic impacts of using chemicals in the cleanest lake in NY. Please do not use the chemical.

Copying and pasting the reasons LGA identified, of which I agree with ALL:

- The lake is your sole source of drinking, cleaning, cooking, and gardening water;
- You ingest water because of swimming, showering, fishing, cooking, gardening;
- Lake water is ingested by people with pre-existing health conditions, young children, women of child-bearing age, pets;
- You eat fish caught in Lake George;
- There is unsuspecting wildlife nearby, such as turtles, ducks, and otters;
- You/the region will lose tourist income because people don’t want to vacation at a lake that puts pesticides in it;
- The reputational damage could lower property values;
- The warnings and instructions on the ProcellaCOR label are not being heeded or followed;
- Milfoil is not a crisis in Lake George;
- There is lack of knowledge around long-term effects of the pesticide.

From: Colby Gendron
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Thursday, May 16, 2024 9:18:08 PM

Hello,

Lake George is the most sacred place to me in the entire world. It is my happy place, where I grew up, and where I plan to raise my own family one day. It is one of the most beautiful and clean bodies of water in the entire world.

As a long-time resident of Lake George, I strongly oppose the use of Procellacor. The Minnesota Department of Agriculture has identified florpyrauxifen-benzyl, its active ingredient, as a PFAS-containing pesticide. Introducing such chemicals into our lake poses significant environmental and health risks. Please reconsider this action and prioritize non-chemical methods to protect our precious lake.

I understand the initial intention, but research has come out that indicates the negatives dramatically outweigh any potential benefit the chemical may have.

Best,

Colby Gendron

From: Ed Scheiber
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Friday, May 17, 2024 11:43:19 AM

I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein.

Please stop the use of this chemical.

Edmund M Scheiber, Jr
Hemlock Point Association
Bolton Landing, NY 12814

From: Sally Cartwright
To: APA Regulatory Programs Comments
Subject: Project 2023-0018; LGPC; Aaron Ziemann
Date: Saturday, May 18, 2024 4:03:42 PM

KEEP LAKE GEORGE CLEAN

Please, please, please do not apply ProcellaCOR to the dynamic water currents of Lake George. I swim for extended periods of time in this water. It is drinking water.

The cleanliness of Lake George water is essential to human health and to the economic health of the communities that surround the lake. Eurasian watermilfoil is not a crisis that calls for risking that health. Do not make forever chemicals more of a crisis than they already are!

I have read and agree with the issues of the Lake George Association's objection letter to the DEC of February 16, 2024. Do not put ProcellaCOR in Lake George water without fully understanding its effect on the unique waters of Lake George.

The towns, the residents, and the multiple organizations that work so, so hard to **Keep Lake George Clean** deserve your support to **Keep Lake George Clean!**

Thank you,

Sally Cartwright
Friends Point
Hague, NY

From: sandryp1@yahoo.com
To: APA Regulatory Programs Comments
Subject: Project 2023-0018;Lake George Park Commission;Aaron Zieman
Date: Thursday, May 16, 2024 9:06:11 AM

We have owned & lived in the Silver Bay area on Lake George for over 50 years & certainly don't want to see it bombarded with TOXIC chemicals!
Please keep TOXIC chemicals out of our beautiful lake!!
Thank you,
Sandy

From: Colleen Wise
To: APA Regulatory Programs Comments
Subject: Projects 2023-0017 & 2023-0018; Lake George Park Commission; Aaron Ziemann
Date: Thursday, May 16, 2024 8:52:49 AM

Good Morning,

I have read the February 16, 2024 Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein.

Our family has been on LG since 1966. Generations have enjoyed swimming, boating, water sports and fishing. The lake is your sole source of drinking, cleaning, cooking and gardening water, so we're very invested in its health & longevity. The warnings and instructions on the ProcellaCOR label are not seemingly being heeded or followed, and there is a lack of knowledge around long-term effects of the pesticide. As such, I respectfully ask that you reconsider.

Thank you,
The Quick Family

From: dparkerwiley@gmail.com
To: APA Regulatory Programs Comments
Subject: Projects 2023-17& 18, Lake George Park Commission :,Aaron Ziemann
Date: Wednesday, May 15, 2024 8:52:45 PM

My extended family has been coming to Lake George since the 1930's and I (I am 76) have spent all or part of every Summer on Lake George. My wife and I currently own a condo at the Sagamore.
I have read the proposal to introduce ProcellaCor into Lake George to combat milfoil in Sheep Meadow and Blair's Bays .
I have also read the opinion of the Lake George Association along with that of the Lake George Waterkeeper.
I agree with their opinion . It seems there is a rush to judgement . I think a decision to introduce a herbicide like ProcellaCor into a body of water known for its purity and cleanliness requires significantly more research. Lake George has unique characteristics that could well make it unreceptive to ProcellaCor. It absolutely requires further research and testing on bodies of water with characteristics similar to Lake George.
My fear is that once it is introduced it could be difficult to impossible to reverse.
I would much prefer the benthic matting coupled with hand harvesting.
However, this needs to be done more frequently than it is at present. If done with greater regularity it is a relatively inexpensive, effective and safe alternative!
I do not believe the BENEFIT of using ProcellaCor is worth the RISK!

Douglas P. Wiley
Sent from my iPhone

May 30, 2024

Aaron Ziemann
Adirondack Park Agency
PO Box 99
1133 NYS Route 86
Ray Brook NY 12977

Re: Applications for use of ProcellaCOR EC in Lake George
(Sheep Meadow Bay and Blair's Bay)

Dear Aaron:

Protect the Adirondacks ("PROTECT") offers these comments for your consideration regarding the applications for the use of ProcellaCOR EC ("ProcellaCor") to treat Eurasian watermilfoil ("EWM") in Lake George. Lake George is one of the great lakes of the Adirondack Park, known for its pristine water quality and clarity, and the lake underwrites a large part of the greater Warren County economy. Lake George is also famous for its high diversity of aquatic plants.

PROTECT is concerned about the use of the synthetic plant hormone, ProcellaCOR, in Lake George and in waterbodies across the Adirondack Park, because of its potential short-term adverse impacts on nontarget species of aquatic plants and organisms, and because of its potential long-term impacts, which are relatively unknown, particularly for waterbodies where the herbicide is being used repeatedly over a period of time. Given that the current applications are from a State agency with State staff and resources that can be brought to bear, we urge APA to hold an adjudicatory hearing on the use of ProcellaCOR in Lake George.

ProcellaCOR in Lake George requires an Adjudicatory Hearing

The APA Board should use the opportunity of an adjudicatory hearing to ensure a thorough airing of the impacts of ProcellaCOR before it is used in the waters of Lake George. Such a hearing, and the resulting information and examination of the potential impacts (both positive and negative) will benefit this application process, as well as the numerous other applications submitted to APA for the use of ProcellaCOR in the Adirondack Park.

Additionally, as highlighted recently by the Lake George Association, new information is coming to light about the possible presence of PFAS in ProcellaCOR and that information should be evaluated through an adjudicatory hearing. In a report issued in February 2024, the State of Minnesota has identified the active ingredient of ProcellaCOR EC (florpyrauxifen-benzyl) as meeting that State's definition of PFAS (meaning that the pesticide contains at least one fully fluorinated carbon atom)[1]. "PFAS do not break down easily in the environment. They also build up in the bodies of exposed humans and animals", and they "may affect the developing fetus and child", and "may decrease fertility and interfere with the body's natural hormones, increase cholesterol, affect the immune system, and even increase cancer risk", according to the NYS Department of Health[2]. "Some PFAS … persist for a long time in the environment, especially in water. Their toxicity and persistence in the environment means they are a potential danger to public health and the environment," according to the NYS Department of Environmental Conservation[3].

Questions merit greater examination in an adjudicatory hearing. The proposed use of ProcellaCOR to treat EWM in Lake George raises many questions, including:

- The winds of the area, high number of streams, and complicated bathymetry of Lake George, its currents and flow patterns are subject to sudden change from weather pattens and rainfall. This complexity should be examined to understand the efficacy of ProcellaCOR in Lake George (which is not "slow-moving/quiescent" as called for by the product label), the spread of ProcellaCOR, and its potential impact (particularly as the product is diluted) beyond the treatment area.
- There are many areas of Lake George with EWM. The applications do not provide a rationale for using ProcellaCOR at the selected sites versus other locations that may have greater EWM infestations or more difficulty with hand harvesting.
- If this project is successful, there will be a biomass of dead aquatic vegetation, and the project does not appear to have fully scoped the potential impacts for harmful algal blooms (HABs) or other events due to the large amount of phosphorus loading from the mass of decaying material.
- Our review of the application finds inadequate scientific data regarding potentially adverse impacts to the rich diversity of native aquatic plants and organisms in Lake George (e.g., native milfoils, stargrass, pondweeds, *Sagittaria graminea* and *Elatine minima*[4], *Nitella,* and *Najas flexillis* as well as invertebrates).

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[1] *See* Minnesota Department of Agriculture, Interim Report to the Legislature dated February 1, 2024, Table 2, page 18, available at https://www.lrl.mn.gov/docs/2024/mandated/240221.pdf.

[2] New York State Department of Health website entitled Per- and Polyfluoroalkyl Substances (PFAS) Frequently Asked Questions, available at https://www.health.ny.gov/environmental/investigations/drinkingwaterresponse/docs/atsdr_pfas_factsheet.pdf.

[3] New York State Department of Environmental Conservation website entitled Per- And Polyfluoroalkyl Substances (PFAS), available at https://dec.ny.gov/environmental-protection/site-cleanup/pfas.

[4] For these two native plant species, APA staff asked the applicant for information "to confirm susceptibility rankings to ProcellaCOR for two plants" observed in the subject bays. The response was that *Sagittaria* has "low relative sensitivity" (even though ProcellaCOR is used to control this species) and that there is no data for *Elatine*.

- The long lasting effects of ProcellaCOR, as it breaks down over time and its subcompounds remain, is not detailed in the materials from the Lake George Park Commission.
- As far as we know, there have not been experiments of ProcellaCOR using mesocosms. These were used in experimentation for chemical treatments for Asian claims in Lake George and the Jefferson Project has used this technique to model various water quality conditions. Use of ProcellaCOR would benefit from experimentation outside the natural waters of Lake George.
- One alternative is enhanced use of hand harvesting, which has been essentially abandoned for these two sites. The applications fail to state why this effort, which for more than 10 years has significantly reduced the number of beds and extent of EWM in Lake George, is not viable for these two sites.

In the past, APA ordered and conducted a formal adjudicatory hearing on the proposed use of the aquatic herbicide Sonar (SeaPro) by the Lake George Park Commission. The current proposal to use chemicals in Lake George merits the same high level of public scrutiny, opportunity for independent expert testimony, and public involvement accorded to the review of the Sonar project 20+ years ago. Given the public concern about this project and the extensive scientific expertise available in the Lake George research community, there is a high level of certainty that this project would change and that new information would be revealed that would help APA in its decision-making. Since the Adirondack Club and Resort project was ordered to a formal adjudicatory hearing in 2007, no hearings on projects have been held by APA. This is an unfortunate miscarriage of regulatory responsibility and we urge you to stop this disturbing trend at this juncture.

Require Plant Surveys and Ongoing EWM Management

The Lake George community has been treating Eurasian watermilfoil with various means for four decades. EWM has spread throughout the entire lake. Of all the treatment methods, hand-harvesting has proven the most successful over the years, especially by utilizing large, trained diving crews over the last 10+ years. The high cost and intensive labor involved are the main drawbacks of hand-harvesting, but it is highly effective at reducing EWM sites and limits disturbance of native aquatic plant populations. Unfortunately, EWM is an invasive plant that will never be fully eradicated from our waters. Once a lake is infested, the most successful efforts have worked to contain it with sustained management. This is the reality on Lake George, just as it is in many Adirondack lakes. EWM treatment is a fact of life that must be continued year after year.

Since EWM is an invasive species that may outcompete native species and have negative consequences on the ecosystem, the use of ProcellaCOR may be an appropriate last resort to reduce EWM if the use of mechanical techniques (e.g., hand harvesting) have already been employed and cannot effectively restore an approximation of the original abundance and diversity of native plant populations. However, careful monitoring and multiyear post-treatment, comprehensive plant surveys after the ProcellaCOR treatment should be mandated by APA as conditions to any permit for the use of ProcellaCOR.

The applications materials from the Lake George Park Commission state that "suction harvesting, benthic barrier and hand harvesting" techniques have already been employed. The materials do not specifically state that these efforts have not been able to effectively control EWM to allow the restoration of native plant populations in the target bays (Sheep Meadow Bay and Blair's Bay). In any event, the Lake George Park Commission is seeking permission from APA to use ProcellaCOR to treat EWM in these particular bays.

In addition, the Lake George Park Commission has indicated that this proposal is a "trial application". The implication is that treatment of the lake with ProcellaCOR is planned in the future for other areas of Lake George that have EWM. PROTECT strongly opposes ongoing, multiyear chemical herbicide treatments with ProcellaCOR. Accordingly, APA should not approve the planned use of ProcellaCOR in Lake George to take place in consecutive years in the absence of scientific data on the long-term and cumulative impacts of the herbicide on lake ecology.

As we have seen, the Lake George Park Commission has been committed through the years to the reduction of EWM through plant surveys and monitoring, and hand harvesting to remove EWM plants in an effort to manage milfoil throughout the lake. Accordingly, APA should condition any permit for the use of ProcellaCOR on the Lake George Park Commission conducting follow-up comprehensive plant surveys after the treatment with ProcellaCOR, and APA should require future, active management of EWM that does not involve the use of chemical herbicides.

On behalf of the Board of Directors of Protect the Adirondacks, we thank you for considering our comments and concerns regarding the use of this herbicide in Lake George.

Sincerely,

Claudia K. Braymer

Claudia K. Braymer,
Deputy Director

cc: David J. Plante, AICP CEP, APA Deputy Director, Regulatory Programs
Dave Wick, Executive Director, Lake George Park Commission

From:	Jack
To:	APA Regulatory Programs Comments
Cc:	"Ginger Henry"; haguesteve@msn.com; "Chris Navitsky"
Subject:	RE: Project 2023-0018; Lake George Park Commission; Aaron
Date:	Monday, May 20, 2024 1:59:31 PM

Dear Sirs,

Know that I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support the issues identified therein. https://lakegeorgeassociation.org/sites/default/files/2024-02/02116_DEC_Waterkeeper_LGA_Objections_FINAL.pdf

I object to ProcellaCor being used anywhere in Lake George at this time! I live in a lakeside community that gets much of our water supply from the Lake and have for the past 25 years. I am greatly concerned that we don't yet know enough about this chemical to trust its use in drinking water, much less in the water we swim in, fish in and boat in!

Given the uncertainties at this time, risking any damage in any way to Lake George is not warranted. This entire region depends on its phenomenal beauty – beautiful in so many ways - for so much of our livelihood and our economics, that any risk where there are reasonable concerns do not make sense.

Respectfully submitted,

John Bast
37 Arcady Drive
Silver Bay, NY 12874
Office (518) 636-6545
Fax (518) 888-3327
Text (248) 514-4702

To: Adirondack Park Agency
From: Barbara Rottier, Esq.
Date: May 30, 2024

Re: COMMENT LETTER Lake George Park Commission; Project 2023-0017
Aaron Ziemann, Project Review Officer

Dear Adirondack Park Agency Board and Staff:

I am opposed to the introduction of ProcellaCOR to the waters of Lake George for all the reasons already enumerated by the Lake George Association and the Lake George Waterkeeper. **I respectfully request that the APA conduct a public hearing to obtain additional scientific evidence regarding the significant concerns raised by these organizations and the affected public and communities.**

There are at least two very critical issues which should be examined in scientific detail.

1) The product label requires that the chemical only be used in "quiescent waters." "Quiescent" is defined as "being at rest or motionless; quiet; still." *Lake George is anything but motionless.* In 1986 the APA held a 28 day hearing on the potential use of the chemical SONAR in Lake George for treatment of Eurasian Watermilfoil); The hearing record, which remains in the Agency's possession, contains testimony regarding the significant currents in Lake George. The SONAR application proposed limno-barriers (a solid barrier from the floor of the lake to its surface) around the proposed treatment areas, as that was the only way the chemical could remain in place for the length of time needed for the chemical to be effective.[1] In the current case, updated scientific information has been presented from the Jefferson Project and the science experts for the Lake George Association and the Lake George Waterkeeper regarding the presence of significant currents and water movement. *It is essential that the issue or water movement be fully examined. Otherwise, the chemical may be applied to no avail.*

2) **ProcellaCOR contains dangerous PFAS.** PFAS are a group of artificial chemicals used in producing consumer and industrial products. They are called "*forever chemicals*" because they last a long time in the environment. In addition, they can illicit many significant health risks for humans, and can accumulate in the body, and damage organs and cause cancer.

The Minnesota Department of Agriculture (MNAg) has identified florpyrauxifen- benzyl, the active ingredient in ProcellaCOR, as a PFAS-containing pesticide. MNAg determined that, even when the active ingredient degrades, the resulting chemicals retain the chemical bond that Minnesota determined to be a PFAS pesticide. *The federal Environmental Protection Agency has said there is no level of exposure to PFAS that is without risk of health impacts, including certain cancers.* New York State has been a national leader in banning PFAS from consumer products and keeping it out of water supplies. Now is not the time to reverse this record and introduce a PFAS chemical into the waters of the State, especially the "Queen of American Lakes."

[1] In the 1986 SONAR case, the application was withdrawn after the hearing.

The citizens of NY State, and the people who live near or visit Lake George, should not be exposed to a PFAS chemical. Lake George is designated as a Class AA waterbody by DEC, the highest classification. Lake George is a drinking water source for many residents. In fact, many homes on Lake George pump their domestic water directly from the lake.

Purpose of the Hearing:
While the APA has a science staff, that staff may not have the expertise to fully evaluate this situation. It is inappropriate for agency staff to rely solely on the applicant's assertions of the safety or efficacy of this chemical in Lake George. The applicant's experts have a vested interest in the outcome. Where there is any controversy or opposing or updated science, there should be sworn testimony, subject to cross examination. Moreover, the many questions raised demand the opportunity for other experts to present their information and be cross-examined. Only via a public hearing will the agencies hear all sides of the issues and be able to make a substantiated, valid decision. Only with a complete analysis of the issues raised will the APA decision be legitimate in the eyes of the public.

As a matter of Administrative Law, the burden is on the applicant to demonstrate compliance with the requirements for issuance of a permit. (See, for example, Matter of Ahavas Chaverim Gemillas Chesed, Inc. v Town of Mamakating, 99 AD3d 1156, October 25, 2012.)

In the case of Sagamore Resort (see APA Project No. 84-1048B, 1985), the Agency denied most of the applicant's request for use of 20+ chemicals because the applicant did not demonstrate there would be "no undue adverse impact" upon the environmental resources of the Park. Findings of Fact #13 states: "The existence of significant data gaps regarding the impacts of certain pesticides does not allow the Agency to make the required conclusion of law that a project will not have an undue adverse impact pursuant to Section 809(10)(e) of the Adirondack Park Agency Act or make the required findings pursuant to 9NYCRR Part 578."

In fact, there was surprising little impact data available for most of those 20+ chemicals, despite the fact that they were chemicals registered by EPA for use. It is not the Agency's responsibility to prove impact; it is the applicant's burden to prove there will be none. The lack of sufficient evidence proving there will be "no undue adverse impact" is alone a basis for denial of a permit, and certainly a basis for a hearing to determine facts.

In the case of ProcellaCOR, the applicant has not proved that there will not be adverse impacts. Others have submitted scientific information that contravene the applicant's justification for use of this chemical in Lake George. ***It is imperative that a public hearing be held to more fully examine the technical science issues clearly presented by the Lake George Association and the Lake George Waterkeeper.***

Two other points: Lake George Eurasian watermilfoil has been maintained using hand harvesting since 1986. This alternative remains viable. The argument that APA staff cannot holding hearings because they "take too much time" has no justification. That excuse does not exist in its operating laws and regulations, nor in Administrative Law.

Thank you for your consideration,

Barbara Rottier
Resident of Hague, NY

February 15, 2023

To Whom It May Concern:

I am shocked and dismayed that the Lake George Park Commission might poison our beautiful Lake George. I have been going to the lake since 1970 and we drink the water directly from the lake with only a UV light to help purify the water.

After nearly a year of overwhelming public opposition, and a preliminary injunction from a New York State Supreme Court Justice, the Lake George Park Commission remains intent on proceeding with use of the herbicide ProcellaCOR in the Lake this summer despite a startling lack of Lake George-specific scientific evidence regarding the short- and long-term impacts.

The Park Commission said this herbicide "worked" in other Lakes. But Lake George is not any other Lake, the state actually created an agency dedicated to look out for its best interests. In addition, Lake George is a Class AA-Special. To risk the water viability without a thorough, peer-reviewed analysis of everything that will happen in Lake George when this herbicide is applied is simply irresponsible, impulsive and unacceptable.

Please protect Lake George by asking the Lake George Park Commission to table its proposed chemical herbicide program and participate in a thorough peer-reviewed scientific analysis of the likely short-and long-term impacts. Only then can we determine whether an herbicide is right for our Lake and everyone who cares about it.

Sincerely,

Nancy Sidford

From: Anne Green
To: APA Regulatory Programs Comments
Subject: Statement in Favor of the Lake George ProcellaCOR application
Date: Thursday, May 30, 2024 7:22:09 AM

My name is Anne Green. I live in Lake George and for the past 25+ years have enjoyed recreating at many Adirondack lakes including Lake George. I am also a High School Science teacher at Hadley Luzerne Central School District. I have a background in Environmental Science including years of water testing with my high school students on Lake Luzerne and the Hudson River.

I have swam in many lakes that have Eurasian Milfoil infestations. In Lake Luzerne, I have seen the efforts of the Luzerne Milfoil Pirates to eradicate using hand-harvesting, benthic mats, and many years ago, the use of Renovate. And yet the milfoil always comes back. I am familiar with many of the areas in Lake George where the professional crews have been working hand-harvesting for many years. And yet, the milfoil comes back. It seems to continue to repopulate each year as the divers have a difficult time removing all the roots, especially in areas where growth is dense. So I would toss out the statement that I do not believe hand-harvesting works in all areas.

I strongly believe in minimal use of chemicals in the environment. I do not even fertilize my own lawn. And where drinking water is concerned, I have the highest level of concern. Clean water is extremely valuable. So any activity which might impact water must have the highest level of investigation and study before it is applied.

I am in favor of the use of ProcellaCOR in Lake George for the following reasons:

- It has been tested and has shown no contraindications for its use
- It has already been used in numerous other lakes, including lakes similar to Lake George and has shown no adverse effects
- The quantity being used is very small. And the nature of the chemical dissipates very quickly.
- The intended sites for use are small compared to the larger lake and they are the sites that have dense growth. As a result the regrowth of milfoil has been high.
- If heavily infested sites are not controlled, growth in the entire lake will continue to expand.

Sincerely,
Anne L Green
Lake George, NY

From: noreply-pc@apa.ny.gov
Sent: Wednesday, May 15, 2024 1:57 PM
To: APA Regulatory Programs Comments
Cc: tomsbait@comcast.net
Subject: APA Project 2023-0018 Public Comments

********** 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 "2023-0018, Jessica Steele, tomsbait@comcast.net" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jessica Steele
Email from: tomsbait@comcast.net
Address: Vermont
Re: Agency Project 2023-0018, Lake George Park Commission

My Comments:

Recently, the Minnesota Department of agricultural has put out a list of active ingredient In pesticides containing PFAS that meet the Minnesota definition. The active ingredient in ProcellaCor EC, Florpyrauxifen-benzyl is on this list. Many people that live around Lake George and other lakes in New York, use these lakes for their drinking water. Is milfoil such a crisis in Lake George that we need to use a forever chemical to control the milfoil. We should not be adding PFAS to drinking water. We should be finding ways to remove PFAS from drinking water sources.
https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.mda.state.mn.us%2Fenvironment-sustainability%2Factive-inert-pfas&data=05%7C02%7CRPcomments%40apa.ny.gov%7C2dc48e98e3c54b54857808dc7508aae6%7Cf46cb8ea79004d108ceb80e8c1c81ee7%7C0%7C0%7C638513927293122818%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=83NLydfkmHGnN4wxim0VGD%2F9vNQFM74dnofkqodMzFI%3D&reserved=0

From: Zarela Gulli
To: APA Regulatory Programs Comments
Subject: Stop ProcellaCOR!
Date: Wednesday, May 29, 2024 1:29:24 PM

Dear APA representatives,

I am writing to you in opposition to ProcellaCOR in Lake George.

This herbicide is too toxic to put in our waterways, and we cannot possibly predict how these chemicals will affect our wildlife, environment, our selves, our children, our friends.

Please, with any care for our planet, do not allow this plan to go through, and save all of our precious Adirondack lakes from falling to this same fate.

Thank you for your time and consideration,
Zarela Gulli
A concerned junior from Keene Central School

I, the undersigned, represent (7) seven generations of one family. Most of us have enjoyed and appreciated the pure waters of Lake George which spring from its basin and pour down its surrounding mountains.

This treasured natural lake has its own currents which continue to flow and circulate on its own course.

That Lake George has been impacted by many more people (and their uses) in ongoing years is a process we recognize and must react to.

But To add ANY chemical to this natural environment would be wrong & detrimental (if not criminal — We drink this water).

We must treat the CAUSE of the problem rather than the problem's effects. Hand-harvesting milfoil has proven effective!! I do not want to drink Procella-Cor. Please do NOT USE PROCELLA-COR.

Suzanne V. Straton (P.O. BOX 141 HULETTS LANDING NY 12841)

NC

From: Christianne Strough
To: Ziemann, Aaron C (APA); joe@lgpc.state.ny.us
Subject: ProcillaCOR treatment Lake George
Date: Thursday, February 29, 2024 1:18:36 PM

I read an article last week of the top 15 small towns in New York State. Lake George made the list. I wonder if the Town/Village of Lake George would make the list if not for the Queen of the American Lakes?

Though I own no property on Lake George, I believe all the residents of Warren County and beyond benefit from the tourism dollars brought in by those visitors wishing to view the beautiful vistas and clean water of Lake George.

Procilla.COR has been studied and used in other lakes in New York with much success. The APA is approaching the application of Procilla.COR with an abundance of caution. Why not proceed?

I hope that the APA, long known for its history of protection of the Adirondacks, will move forward with this measured, reasoned approach to keep the waters of Lake George clean and beautiful.

Thank you.

Chris Strough
Queensbury, NY

From: Harrison Freer
To: APA Regulatory Programs Comments
Cc: dave@lgpc.state.ny.us
Subject: Support for Lake Georcge Park Commission ProclellaCOR project
Date: Thursday, May 30, 2024 12:14:03 PM

Dear Adirondack Park Agency,
I am writing in support of the Lake George Park Commission ProcellaCOR proposed pilot application. I am a seasonal boat user of Lake George and I applaud the efforts of the LGPC in protecting the lake. Their work on mandatory boat inspections and more recently sewer inspections is fantastic. I believe and trust that they have done the proper due diligence with regard to ProcellaCOR and this is a well thought out project with infantecible risk. Please approve this effort.
respectfully,
Harrison Freer
28 Garrison Rd, Queensbury, NY 12804
571.243.8239

From:	mary stalker
To:	APA Regulatory Programs Comments
Subject:	Support for Lake George Park Commission's Application
Date:	Thursday, May 30, 2024 12:58:40 PM

Dear Adirondack Park Agency,

I am writing to express my support for the Lake George Park Commission's application to use ProcellaCOR for managing invasive Eurasian watermilfoil in Lake George. This next-generation herbicide has been approved by the U.S. EPA, NYS DEC, and the Department of Health, ensuring its safety and efficacy.

Key benefits of ProcellaCOR include:
-No restrictions on drinking water, swimming, or fishing post-application
-Rapid breakdown, typically within 48-72 hours
-Successful treatments in over 200 lakes in the Northeast
-Positive outcomes in native plant species recovery

This project will significantly benefit Lake George's ecosystem and water quality. I urge you to approve this important initiative.

Thank you for your consideration.

Best regards,

Mary Stalker

From:	ELIZABETH BIRD
To:	APA Regulatory Programs Comments
Subject:	Support for Lake George Park Commission"s herbicide permit
Date:	Thursday, May 30, 2024 10:55:44 AM

To the Adirondack Park Agency,

The Lake Bomoseen Association fully supports the Lake George Park Commission's herbicide permit application.

ProcellaCOR is an approved, thoroughly tested and researched tool for Eurasian Milfoil management and the LGPC deserves support for this very modest 'pilot' treatment.

When over 200 Lakes have been granted permits in the Northeast alone over the past 5 years-to great success and no ill effects, denying Lake George this permit would be simply caving to well funded political pressure.

False statements and hysteria should not outweigh State supported, exhaustively researched, scientific evidence in the permit process.

Please support this application.

Best Regards,

Liz Bird
President, Lake Bomoseen Association

From: Tricia Freer
To: APA Regulatory Programs Comments
Subject: Support of ProcellaCOR
Date: Thursday, May 30, 2024 1:22:14 PM

As a user of Lake George for over 50 years I have witnessed how invasive species have been overtaking the southern basin of Lake George. I am very supportive of the clean, drain & dry intiative which the LGPC developed and oversees. I feel using chemials does warrant caution, but also feel the LGPC has investigated and studied the pros and cons of this application. I support the use of procellaPOR in this pilot test. This is not the time for no action.
Hand harvesting is costly and in my opinion has not stopped the spread of milfoil. I have been an advocate for no anchoring in known areas where invasive species are present/ now extensive, since 2014.
Unfortunately this new issue has the lake community divided. I believe everyone of us wants what is best for the lake and it's future.
Thank you for the opportunity to share my thoughts.

Tricia Lambert Freer
117 Rockhurst Rd.
Queensbury, NY

From: Jayne Montera
To: APA Regulatory Programs Comments
Subject: To whom it may concern,
Date: Wednesday, May 29, 2024 8:59:13 AM

I would like to vice my opposition to the use of ProcellaCOR in Lake George. It has been shown to contain cancer causing agents as well as damaging plant life in the areas it is used. We drink the lake's water as well as swim in it. The amount of milfoil is controllable without chemicals hazardous to people plants and fish. We want to keep our A1 class lake clean and clear as it has been for millennia. Also, Tourists won't want to come if the lake becomes tainted, literally or by reputation.
Respectfully,
Jayne Montera
107Schuyler st.
Lake George

Town of Hague

Community Center • 9793 Graphite Mountain Road • P.O. Box 509 • Hague, NY 12836

John Burth
Environmental Program Specialist 3
Adirondack Park Agency
PO Box 99
Raybrook, NY 12977

February 24, 2023

Dear Mr. Burth,

RE: APA Project #2023-008

I am enclosing documents showing our opposition to this project. The project sponsor, The Lake George Park Commission states the project is located in the Town of Hague YET the Town did not receive any project notifications.

We find it very disturbing that we have been omitted from all correspondence/notifications. When in fact, the project is located in the Town of Hague waters as the boundaries are shown on the NYS Warren County GIS map and as stated by the LGPC in their application.

The Town of Hague wants to go on record that we are opposed to this project.

Best Regards,

Edna A. Frasier

Edna A. Frasier
Supervisor

Steve Ramant
Deputy Supervisor

EAF/SR/dt
encs.
cc: Town Board
Lake George Association

Phone: (518) 543-6161 • Fax: (518) 543-6273

Town of Hague

Community Center • 9793 Graphite Mountain Road • P.O. Box 509 • Hague, NY 12836

February 23, 2023

Honorable Kathy Hochul
Governor, New York State
NYS Capitol Building
Albany, NY 12224

RE: Lack of notification about ProcellaCOR test sites in Town of Hague waters

Dear Governor:

The Lake George Park Commission has applied to the Adirondack Park Agency (APA) for a permit to put the chemical herbicide ProcellaCOR into Lake George at two test sites that are within the Town of Hague's waters – in Blair's Bay in Glenburnie/Town of Putnam Station and Sheep Meadow Bay in Huletts Landing/Town of Dresden. According to the Warren County New York State GIS map, the Town of Hague's boundaries extend to the high water mark on the east side of the lake, putting both of these sites within Hague's waters.

Despite the fact that these two test sites are within the Town of Hague's jurisdictional waters, thus making Hague a riparian owner, we were not notified by the DEC, the APA, nor the Lake George Park Commission (LGPC) that they have applied for a permit to test ProcellaCOR, a potentially harmful herbicide, in our waters. Interestingly, the LGPC and Brian Primeau, Bureau of Pesticides and management NYSDEC Region 5, did send a notification on January 24, 2023, to all riparian owners on the east shore of Lake George and asked for their consent.

We do not know if this lack of notification to the Town of Hague was an oversight or intentional. Either way, we were not given the opportunity to express our dissent. Is it perhaps because the Town of Hague is a party to a lawsuit against the APA, which contends that the APA must hold an adjudicatory hearing before granting a permit for ProcellaCOR in Lake George?

In addition, LGPC Executive Director Dave Wick held an informational zoom on February 15.

As the Deputy Supervisor of Hague, I was made aware of the zoom meeting by a concerned resident and was able to listen to it after the fact. During that zoom, Mr. Wick stated that 2,000 emails were sent to Lake George area residents, based on Washington County tax maps. At least one resident in the Town of Hague received this email, though the town government did not. The question here is: Who actually received these emails and how many were sent?

There has been a lot written about the lack of data about how ProcellaCOR might affect the ecology of Lake George. More than 4,600 people have signed a petition against its use in Lake George until more is known, and three town governments – Ticonderoga, Hague, and Dresden – have passed resolutions against this use. I am sure you have also received numerous letters from concerned citizens about ProcellaCOR.

Phone: (518) 543-6161 • Fax: (518) 543-6273

I wanted to make you aware of these state agencies' total disregard and disrespect for local government. I feel that this is reason enough for you to intervene with them to request that they cease with their attempt to perform this potentially dangerous experiment in Lake George, the Queen of American Lakes and a driver of the economy for the North Country.

Lastly, I'd like you to see the enclosed photograph of people holding signs outside of Warren County Court on February 17, when Judge Robert Mueller heard arguments on both sides of the ProcellaCOR case. The signs say it all.

Best regards,

Edna A. Frasier

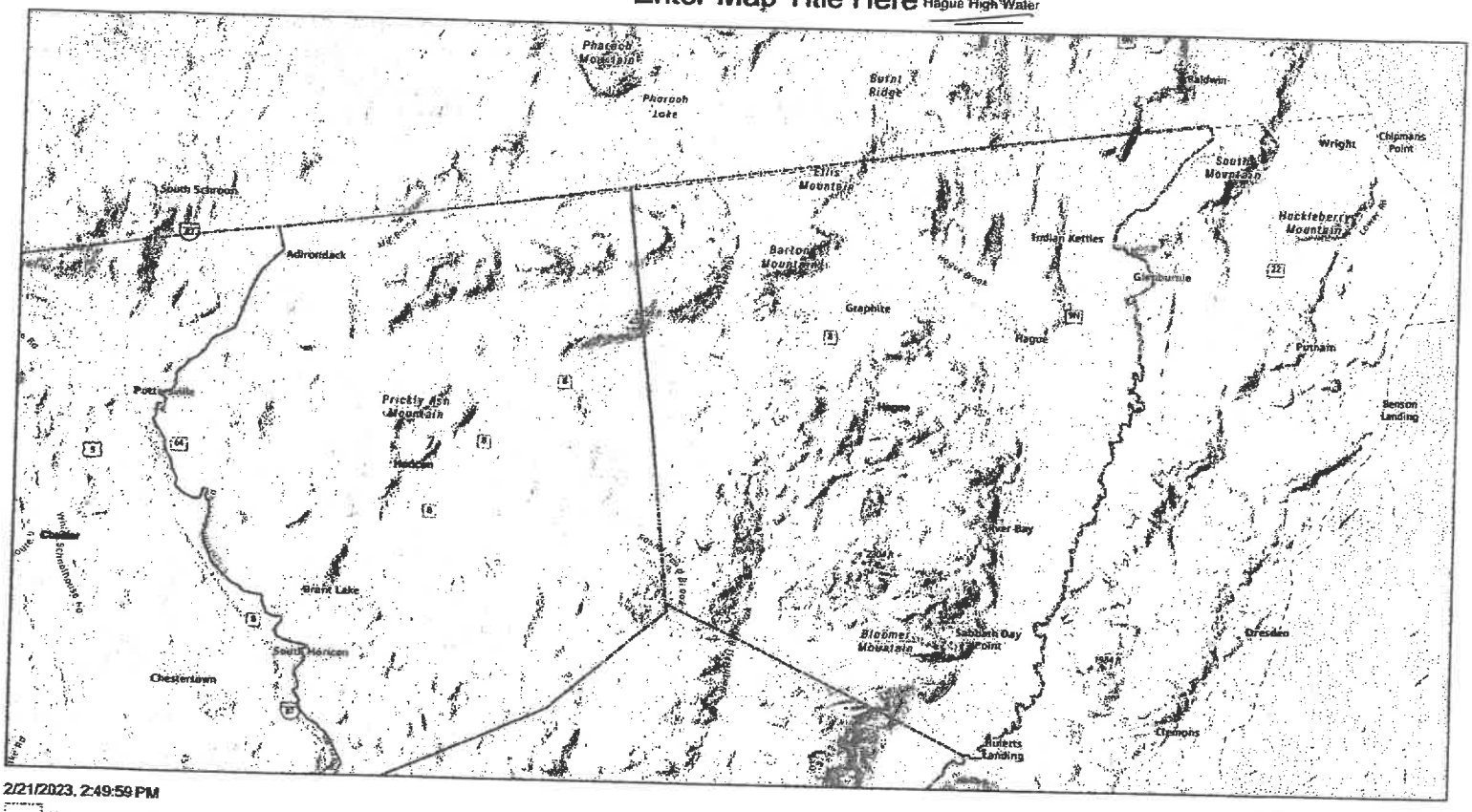
Edna A. Frasier
Supervisor

Steve Ramant
Deputy Supervisor

EAF/SR/dt
encs.
cc: Town Board
LGA

Town of Hague
GIS
Warren County Map

Enter Map Title Here Hague High Water



2/21/2023, 2:49:59 PM

Town Boundaries

1:144,448

0 1.25 2.5 5 mi

0 2 4 8 km

Esri, NASA, NGA, USGS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA

Esri, NASA, NGA, USGS | Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA | DJ Pennala | NYS ITS GIS Program Office | NYS ITS GIS Program Office, Westchester County GIS | NYS Adirondack Park Agency | EJG | Esri, TomTom | NYS Dept. of Environmental

Warren County NY GIS

NEW YORK
STATE OF OPPORTUNITY

Lake George Park Commission

Bruce E. Young
Chairman

Dave Wick
Executive Director

LETTER OF NOTIFICATION

January 24, 2023

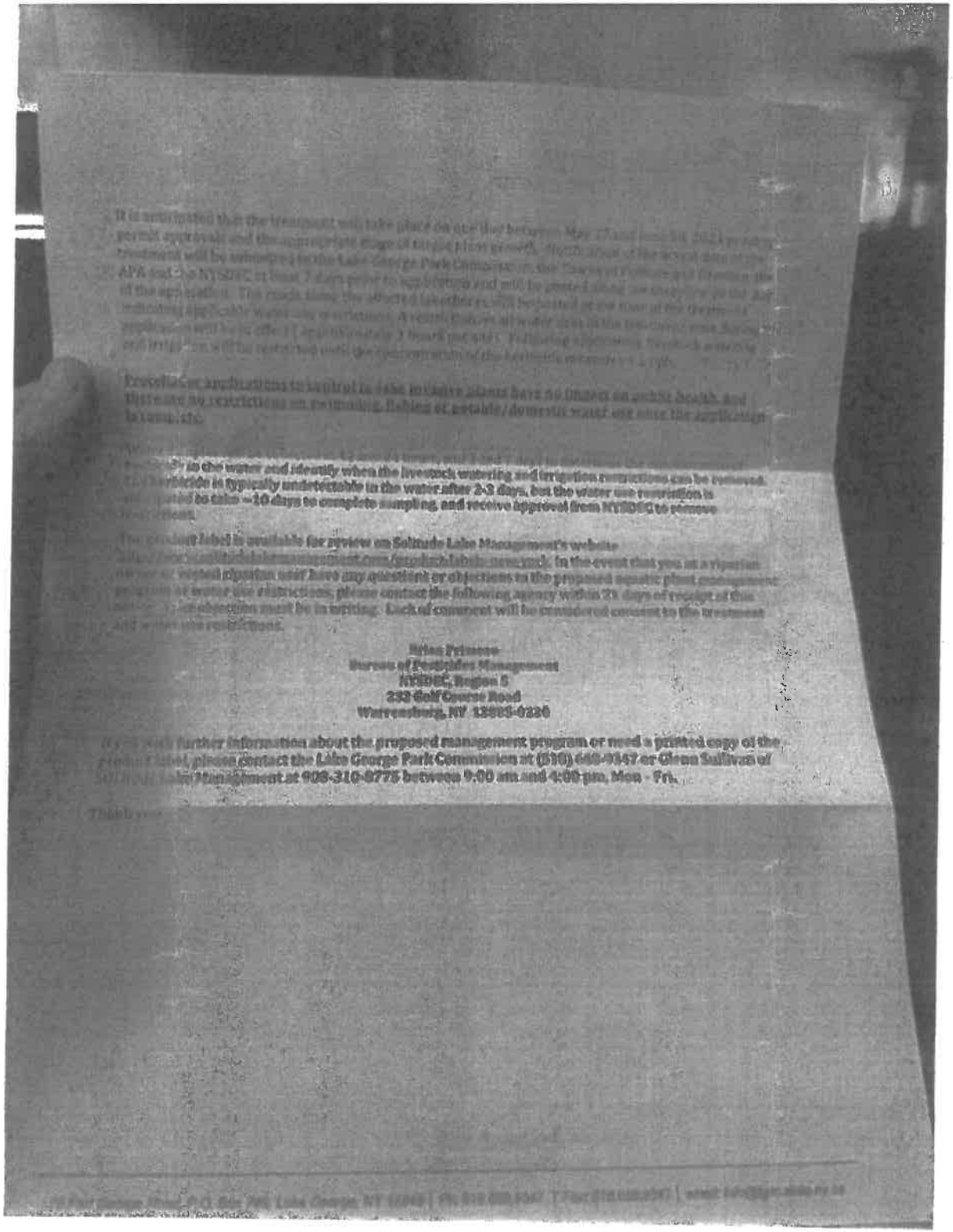
Proposed Invasive Plant Management Program – Blairs Bay & Sheep Meadow Bay in Lake George

The Lake George Park Commission is applying to the NYSDEC and the APA to use an aquatic herbicide in the spring of 2023 to control the invasive plant Eurasian Watermilfoil (EWM) in two areas of the lake: Blairs Bay, Glenburnie (4 acres) and Sheep Meadow Bay, Huletts Landing (3.6 acres). See maps below.

Blairs Bay, Glenburnie

Sheep Meadow Bay, Huletts

The herbicide, ProcellaCOR EC, **will control invasive Eurasian watermilfoil for multiple seasons in the** *treatment areas, but will not impact most native plants.* **This project was not conducted in 2022 as** *planned. ProcellaCOR EC will be applied at less than 10 parts per billion (a rate roughly equivalent to less* **than an ounce in a typical swimming pool), a rate which is significantly lower than most other aquatic** *herbicides. The treatment will be conducted by the firm SOLitude Lake Management, NYSDEC Pesticide* Business Registration No. 17886. **NYSDEC and APA permit applications have been submitted for approval** *for the treatment.*



to the water and ideally when the livestock watering and irrigation restrictions can be removed. ...ridone is typically undetectable in the water after 2-3 days, but the water use restriction is ...ted to take ~10 days to complete sampling, and receive approval from NYSDEC to remove ...ctions.

...t label is available for review on Solitude Lake Management's website ...solitudelakemanagement.com/product-labels-new-york. In the event that you as a riparian ...ected riparian user have any questions or objections to the proposed aquatic plant management ...or water use restrictions, please contact the following agency within 21 days of receipt of this ...objection must be in writing. Lack of comment will be considered consent to the treatment ...water use restrictions.

Brian Prisco
Bureau of Pesticides Management
NYSDEC, Region 5
232 Golf Course Road
Warrensburg, NY 12885-0220

...further information about the proposed management program or need a printed copy of the ...label, please contact the Lake George Park Commission at (518) 668-9347 or Glenn Sullivan of ...Management at 908-310-8775 between 9:00 am and 4:00 pm, Mon - Fri.

Resident Letter

From: Dave Wick <dave@lgpc.state.ny.us>
Sent: Wednesday, February 15, 2023 9:57 PM
To:
Subject: Lake George Milfoil and ProcellaCOR

Lake George Area Residents,

You may have seen some recent emails and media articles regarding the Commission's efforts to utilize an aquatic herbicide called ProcellaCOR to effectively manage the invasive species Eurasian Watermilfoil in Lake George. Much to our concern, the local non-profit Lake George Association has undertaken an opposition campaign that is not scientifically or factually accurate, often calling into question the impact of this herbicide. In reality, ProcellaCOR has been tested for years and shown to be a game changer in the field of invasive milfoil management, with absolutely no impacts on public health. Hundreds of lakes in the Northeast and in New York State have used ProcellaCOR, with incredible results, often eliminating this aggressive invasive species for the first time in decades. The Lake George Park Commission is the NYS agency charged with the protection of Lake George and the safety of its users, and we collaborated with top regulatory and scientific experts throughout the Northeast for almost two years before we advanced this project. To undertake a project that would in any way negatively affect either would be an absolute non-starter for this agency.

ProcellaCOR is not a toxic chemical, but rather a plant hormone that only affects very specific plants and nothing else. Following application, there are no drinking water restrictions, no swimming or fishing restrictions, and it breaks down and is completely gone within a few days' time. Like all registered aquatic herbicides, ProcellaCOR has gone through many years of peer-reviewed scientific study, rigorous scrutiny and ultimate approvals by the Environmental Protection Agency, the NYS Department of Environmental Conservation and the NYS Department of Health. What we propose in Lake George is to treat two small invasive milfoil infestations that have been difficult to control with traditional harvesting means. The NYS LGPC and NYS DEC fully expect these applications to be completely successful, eliminating these milfoil beds entirely with no ecological or public health impacts, similar to several other lakes in our region.

If you are interested in this topic, we encourage you to review the considerable information on our website at www.lgpc.ny.gov, or reach out to our office at any time to discuss more about it.

Thank you, looking forward to a great 2023 summer season.

Dave Wick

Executive Director

Lake George Park Commission

Town of Hague

Community Center • 9793 Graphite Mountain Road • P.O. Box 509 • Hague, NY 12836

RESOLUTION # 62 OF 2023

Resolution regarding ProcellaCOR on Lake George

Resolution introduced by Councilmember Ramant and seconded by Councilmember Cherubini.

WHEREAS, the Lake George Park Commission has again applied for a permit to apply ProcellaCOR herbicide at two treatment sites in Lake George, and

WHEREAS, the treatment sites are in waters within the Town of Hague, and

WHEREAS, ProcellaCOR treatment in Lake George is scheduled for one day between May 17th and June 30th, 2023, and

WHEREAS, the potential adverse impacts of ProcellaCOR on water quality, human health, and aquatic plant and animal life have not been fully examined, and

WHEREAS, many Lake residents use Lake George as their drinking water source, as well as for cooking, bathing and swimming, now, therefore, be it

RESOLVED, that the Town of Hague wishes to go on record as opposing the application of ProcellaCOR in Lake George at this time.

DULY ADOPTED BY THE FOLLOWING VOTE:

AYES: Frasier, Ramant, Bast, Cherubini and Patchett
NAYS: None
ABSENT: None

DATED: February 14, 2023

Kim Coffin, Town Clerk

Phone: (518) 543-6161 • Fax: (518) 543-6273

TOWN OF DRESDEN RESOLUTION #8-2023

Resolution regarding ProcellaCOR testing on Lake George

WHEREAS, the Lake George Park Commission has applied for a permit to apply ProcllaCOR herbicide at two test sites in Lake George,and

WHEREAS, the test sites are in the waters within the Town of ~~Dresden~~ Hague N.Y.,and

WHEREAS, the potential adverse impacts of PorcellaCOR on water quality, human health, and aquatic plant and animal life have not been fully examined, and

WHEREAS, many residents use Lake George water as their drinking water source, now therefore, be it

RESOLVED, that the Town of Dresden wishes to go on record as opposing the application of PorcellaCOR in Lake George at this time.

DULY ADOPTED BY THE FOLLOWING VOTE

AYES- Allen W. John B. Marc B. Paul F.

NAYS- ~~0~~

ABSENT- ~~0~~

DATED: FEBUARY 13, 2023

Town of Dresden Supervisor

Minutes for a Ticonderoga Regular Town Board Meeting held on February 9, 2023, commencing at 6:00 p.m. with Public Hearings regarding a repeal of LL #3-2007 for the Administration & Enforcement of NYS uniform Fire Prevention & Bldg Code and regarding EMS Services in the Town

Resolution #86-2023 brought by Tom Cunningham, seconded by Joyce Cooper authorizing the Supervisor to execute the Agreement for Maintenance of County Roads between the Town of Ticonderoga and Essex County for 2023. **All in Favor** Mark Wright – Aye, Dave Woods – Aye, Joyce Cooper – Aye, Tom Thatcher – Aye, Tom Cunningham – Aye. **Opposed** – none. **Carried.**

Resolution #87-2023 brought by Dave Woods, seconded by Tom Thatcher authorizing the approval of an agreement between the Town of Ticonderoga and Essex County for the Annual Lease of DMV Office Space at 132 Montcalm Street in the amount of $2,200 for the term of the 2023 lease. **All in Favor** Mark Wright – Aye, Dave Woods – Aye, Joyce Cooper – Aye, Tom Thatcher – Aye, Tom Cunningham – Aye. **Opposed** – none. **Carried.**

Resolution #88-2023 brought by Tom Cunningham, seconded by Joyce Cooper to approve the Town Clerk posting notification of the completed AUD for 2021 in the legals of the Sun Community News. **All in Favor** Mark Wright – Aye, Dave Woods – Aye, Joyce Cooper – Aye, Tom Thatcher – Aye, Tom Cunningham – Aye. **Opposed** – none. **Carried.**

Resolution #89-2023 brought by Tom Thatcher, seconded by Joyce Cooper to advertise for Food Service helpers and a cook for the 2023 Summer Meal Service Program. **All in Favor** Mark Wright – Aye, Dave Woods – Aye, Joyce Cooper – Aye, Tom Thatcher – Aye, Tom Cunningham – Aye. **Opposed** – none. **Carried.**

Resolution #90-2023 brought by Dave Woods, seconded by Tom Cunningham approving the annual subscription renewal of VMware vSphere cloud computing virtualization platform through StoredTech in an amount not to exceed $175.00. **All in Favor** Mark Wright – Aye, Dave Woods – Aye, Joyce Cooper – Aye, Tom Thatcher – Aye, Tom Cunningham – Aye. **Opposed** – none. **Carried.**

Resolution #91-2023 brought by Mark Wright, seconded by Dave Woods opposing the application of ProcellaCOR in Lake George until such time that the necessary scientific evidence can be gathered on the potential adverse impacts to Lake George water quality, human health, and aquatic plant and animal life. **All in Favor** Mark Wright – Aye, Dave Woods – Aye, Joyce Cooper – Aye, Tom Thatcher – Aye. **Opposed** – none. Tom Cunningham – Abstain. **Carried.**

Town of Hague

Community Center • 9793 Graphite Mountain Road • P.O. Box 509 • Hague, NY 12

RESOLUTION # 87 OF 2022

Resolution regarding ProcellaCOR testing on Lake George

Resolution introduced by Steve Ramant and seconded by Joshua Patchett

WHEREAS, the Lake George Park Commission has applied for a permit to apply ProcellaCOR herbicide at two test sites in Lake George, and

WHEREAS, the test sites are in waters within the Town of Hague, and

WHEREAS, the potential adverse impacts of ProcellaCOR on water quality, human health, and aquatic plant and animal life have not been fully examined, and

WHEREAS, many residents use Lake George water as their drinking water source, now, therefore, be it

RESOLVED, that the Town of Hague wishes to go on record as opposing the application of ProcellaCOR in Lake George at this time.

DULY ADOPTED BY THE FOLLOWING VOTE: 5-0

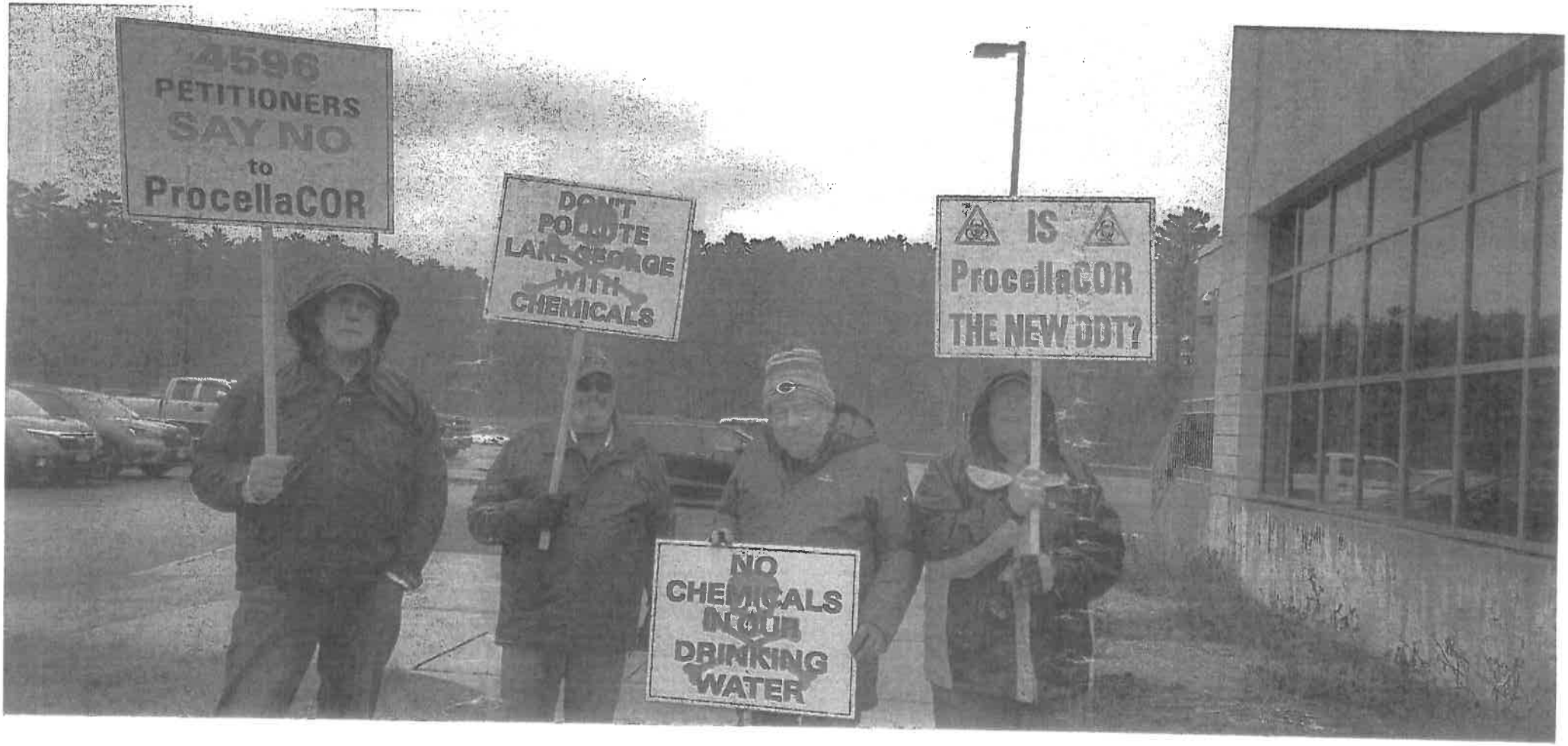
AYES: Frasier, Ramant, Bast, Patchett, Cheruvo.

NAYS: 0

ABSENT: 0

DATED: April 12, 2022

MEAGHAN CLONAN, TOWN CLERK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PETITIONERS
SAY NO
to
ProcellaCOR
DONT
POLLUTE
WITH
CHEMICALS
IS
ProcellaCOR
THE NEW DDT?
NO
DRINKING
WATER

From:	Mike Kelly
To:	APA Regulatory Programs Comments
Cc:	Mike Kelly
Subject:	UPDATED WITH NEW MATERIAL: Project 2023-0017; Project 2023-0018; Lake George Park Commission; Aaron Ziemann; ProcellaCOR usage in Lake George
Date:	Thursday, May 30, 2024 11:51:04 PM
Attachments:	Text Description automatically generated.png A picture containing application Description automatically generated.png Map Description automatically generated.png Map Description automatically generated.png Map Description automatically generated.png

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

Re: Any and all planned application of ProcellaCOR in Lake George in Sheep Meadow Bay or Blair's Bay.

Dear Mr. Zeimann and Adirondack Park Agency,

Please include the following comments along with my comments from yesterday (included below).

Point 5: The areas targeted for killing EWM are not the 3.6 and 4.0 acre "Treatment Areas" in the Lake George bays proposed for ProcellaCOR application, but rather, are the *"Dilution Zones" (40 and 60 acres, respectively!)* This is evidenced by two statements in the Ziemann affidavit.

From affidavit of Aaron Ziemann in LGA v. APA/LGPC:

67. The concentration of ProcellaCOR beyond the boundaries of the dilution zones in both bays is below that needed to kill Eurasian watermilfoil, which is highly sensitive to ProcellaCOR.

This clearly indicates that the concentration of ProcellaCOR *within* the boundaries of the **Dilution Zones** in both bays is *above or sufficient to that level needed to kill Eurasian watermilfoil.*

This is also evidenced by the touted "over-achievement" of the herbicide efficacy in Minerva Lake (from same document):

26. A post-treatment plant survey in 2020 showed that EWM was eradicated throughout all 79 acres of Minerva Lake, not just the 41-acre treatment area. In a survey in the fall of 2021, 18 months after the treatment, a single Eurasian watermilfoil plant was found in the lake, well outside of the treatment area."

Finally, the APA permit applications (2022) for Lake George include this paragraph:

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➔ This makes it very clear that the target EWM kill zone ("area of influence") for Sheep Meadow Bay is 40 acres(!) and not the 3.6 acres of the proposed "Treatment Area", and for Blair's Bay, the target EWM kill zone ("area of influence") is 60 acres(!) and not the 4.0 acres of the proposed "Treatment Area". **The LGPC and SOLitude Lake Management have both been exceedingly disingenuous, obscuring this fact, by repeatedly saying they're only applying it to the smaller "Treatment Areas". Additionally, the maps included on the APA website for the forthcoming meeting *only show the "Treatment Areas" and do not show the "Dilution Zones". This is exceedingly misleading and disingenuous to the public. The LGPC and the APA should at least be honest with the public and say that the LGPC wants to dump sufficient ProcellaCOR into the lake to kill EWM over 100 acres of Lake George, not just the 7.6 acres that the product will actually be applied to, EVEN THOUGH NO EWM WAS FOUND THAT FAR OUT. Again, where is the transparency? It's nowhere. This is all done to obfuscate the real intention. Indeed, the application for Minerva Lake was only over approximately one half of that lake, and yet, the EWM was killed across the entire lake (and is touted as a success). Ironically, in the Minerva Lake application to the APA, a number of finely shaped "Exclusion Zones" were defined where no herbicide was to be applied. But as the application killed all the EWM in the entire lake, these "Exclusion Zones" were obviously also hammered with sufficient herbicide to kill any EWM therein and expose any other sensitive ecosystem components to the herbicide (i.e., whatever they were implying the herbicide would be "excluded" from reaching was obviously exposed). As with the Lake George applications, limiting the "Treatment Areas" to only a few acres, with sufficient concentrations to kill EWM over 40-60 acres appears to be done to provide the appearance of diligence and restraint, when in reality, the applicators DON'T REALLY KNOW WHERE THE STUFF IS GOING TO END UP. At the very least, you all should notify neighbors outside the Dilution Zones that their kids may be drinking PFAS contaminated water and tell them not to water their lawns with lake water for a while.***

-

In the graphics below, taken from the applications for ProcellaCOR usage in the lake George bays, the red "treatment areas" shown are red herrings, as the herbicide applications are intended to kill all the EWM out to the regions delineated with the yellow lines. Only, there isn't any milfoil out there (or at least none was observed, see following two EWM survey maps). They know the stuff is going to get swept away quickly, so they are applying high dosages. They don't want to repeat the failure of the ProcellaCOR treatment at Tommahawk Lake, WI (https://www.tomahawklake.org/wp-content/uploads/2022/07/TLA-news-2022-spring-final-WEB.pdf) … so they're applying a higher dosage.

All graphics are from the applications submitted to the APA:

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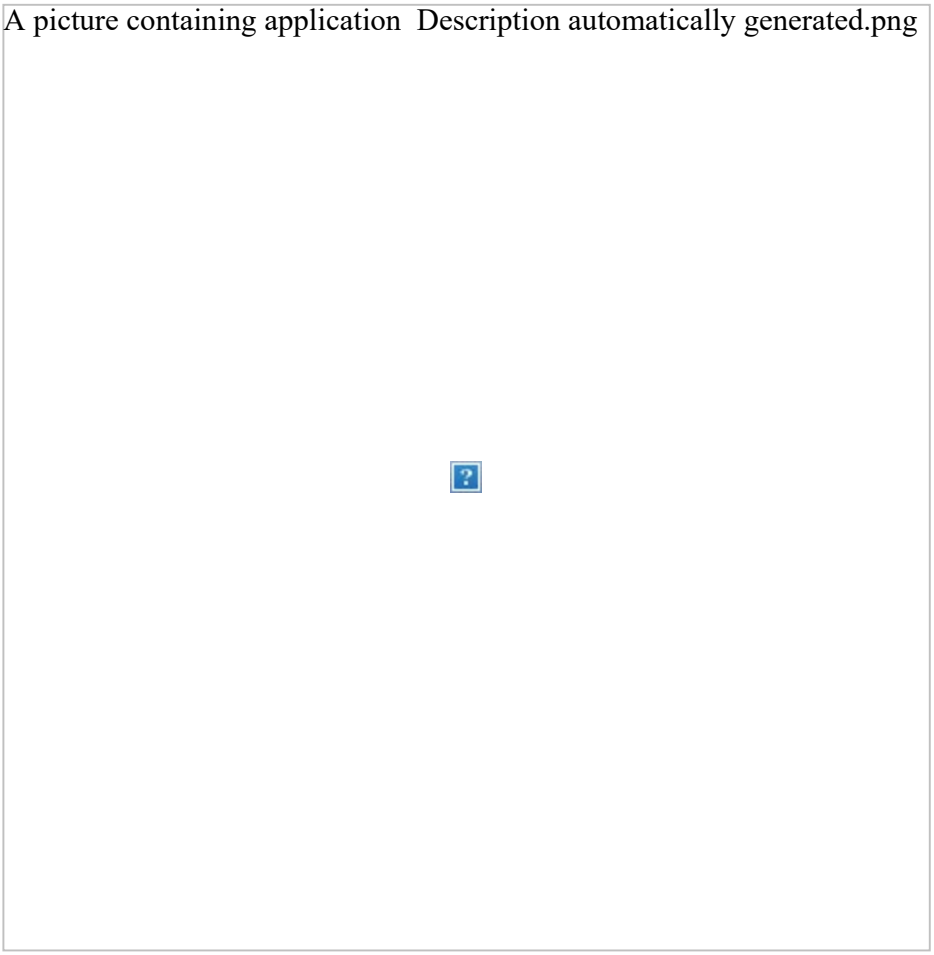

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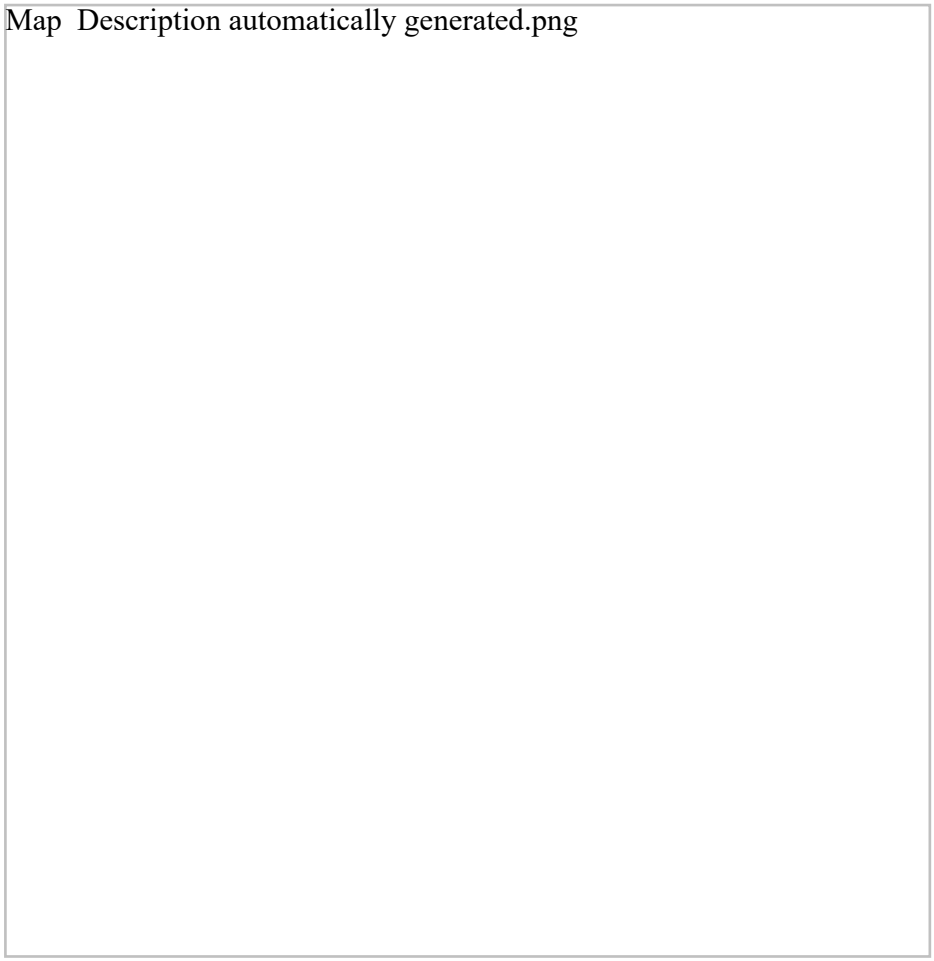
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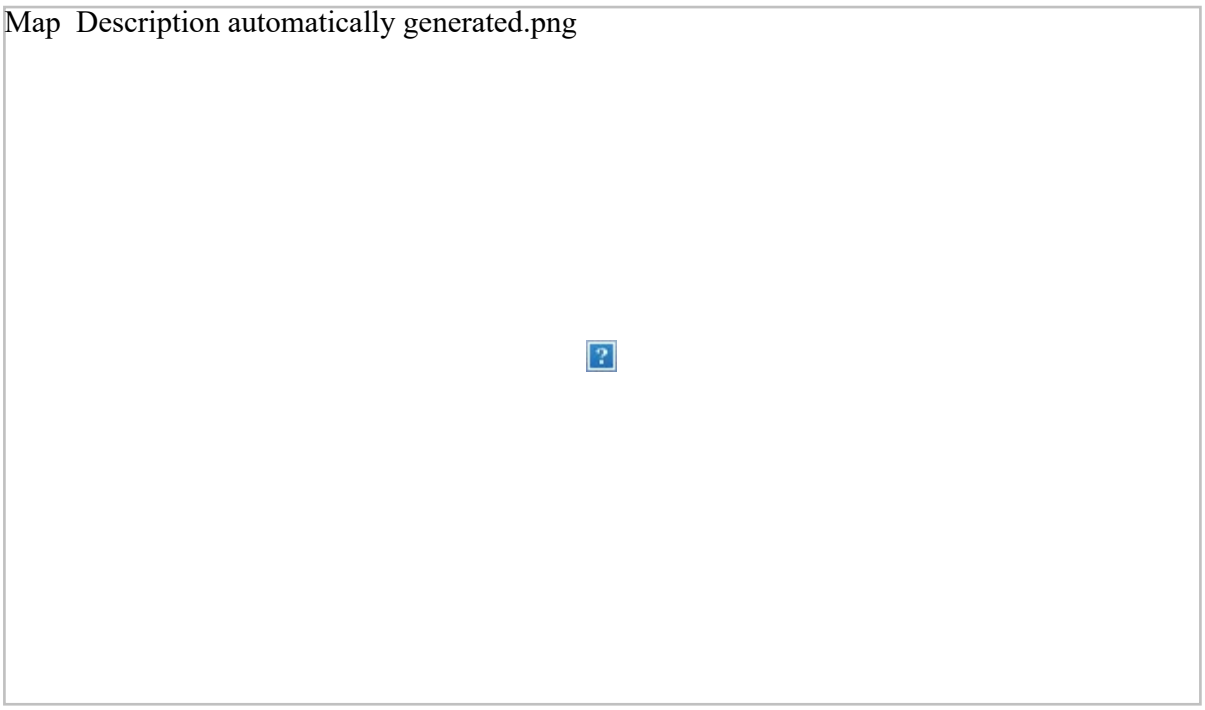

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Point 6: The so-called "dilution model" in the application is nothing more than 3rd grade math calculating the ratio of the applied chemical to the estimated volume of water in the "Dilution Zone".

The DEC "dilution model", as used in the APA applications, is not a model. It is simple, single arithmetic operation that ignores observed flows in the bays. It ignores that there is absolutely no barrier to passage, of the herbicide, beyond the arbitrarily defined outer boundaries of the "Dilution Zones". It ignores that the herbicide could easily be swept out of the Dilution Zone in concentrated form, including by the westward cross flow from the inflow of Sucker Brook (see LG Waterkeeper's presentation to Town of Putnam Board).

The "dilution model" spreadsheet documentation reads:

> *The purpose of this spreadsheet is to estimate the distance downstream required for the notification of riparian owners/users of pesticide water use restrictions. This spreadsheet can be used to estimate concentrations of substance and travel time to a given point in flowing waters. It is assumed that the only major processing is dilution and a first order decay (if applicable). Dilution is estimated using the area of the target watershed or point on a stream and a corresponding United States Geological Survey (USGS) reference gage from which the flow of the watershed in question may be obtained by correlating it to the flow and corresponding area from the reference gage. It is suggested that reference gage information be obtained using gages operated and maintained by the USGS. Half-life is incorporated in the model when choosing an active ingredient from the drop down.*
>
> This is laughably simplistic and ignores the reality of water movement in the bays, including the obvious cross-flow out of the "Dilution Zone" of Blair's Bay, due to Sucker Brook (see point #3).

For these reasons, and the reasons I cite below (yesterday's email), please deny the application for

the usage of ProcellaCOR in Lake George.

Sincerely,

Mike Kelly

On May 29, 2024, at 11:53 PM, Mike Kelly <mike@mike-kelly.com> wrote:

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

Re: Any and all planned application of ProcellaCOR in Lake George in Sheep Meadow Bay or Blair's Bay.

Dear Mr. Zeimann and Adirondack Park Agency,

I am a seasonal resident of Lake George and a researcher in the field of limnology.

I adamantly oppose the use of ProcellaCOR in Lake George. I have read the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper, and I support and agree completely with the issues and points identified therein.

Additionally, I want to clarify the following points:

1. It is nonsense that eurasian watermilfoil (EWM) is in any way causing a crisis in Lake George. It is not causing an ecological crisis. It is not causing an economic crisis. The weed is presently being adequately managed through diver-assisted suction harvesting (DASH). The notion that the LGPC needs this as "just another tool in the toolbox" is completely disingenuous. I share in a very widespread sense that the community is being lied to on this point.
2. The notion that EWM in both Blair's Bay and Sheep Meadow Bay has been difficult to manage is comical. The LGPC has *chosen* to not take any action to control the plant in Blair's Bay *since 2017*, and has *chosen* to not take any action to control the plant in Sheep Meadow Bay *since 2014!* And yet — *and yet* — the plant has not substantially spread in either bay since those now-long-ago harvest years.
3. The restrictions on the use of ProcellaCOR spelled out on its own label are not being followed. This is exhibited in the "dilution models" in each of the bays' applications. The ProcellaCOR label clearly states that it is only to be used, "for management of freshwater aquatic vegetation in slow-moving/quiescent waters with little or no continuous outflow". **The application for Blair's Bay shows the planned "dilution zone" which includes the "treatment area" and shoreline that includes the inflow of Sucker Brook, a brook known to have hundreds to thousands of cubic feet of water per hour inflow into Lake George (i.e., into the defined "dilution zone" and directly over or through the "treatment area"), during the months of May and June. *Yet the dilution model in the application***

for Blair's Bay completely ignores this fact (yes, this is as incredible as it sounds). Indeed, that continuous inflow from Sucker brook NECESSARILY induces <u>continuous outflow</u> from the dilution zone, <u>by the same amount</u>. This is common sense and is mathematically and scientifically provable. And yet, the application completely ignores this fact. The product will be used off-label, which is a violation of federal law. This continuous flow through the dilution zone was exhibited by the Lake George Waterkeeper at a recent Town of Putnam Town Board meeting. Additionally, both bays show highly variable water movement in a recently published, peer-reviewed limnological journal.

4. The recent preliminary determination by the Minnesota Department of Agriculture that florpyrauxifen-benzyl is a potential cancer causing PFAS "forever chemical" should <u>*at least*</u> put the application process on pause. Given that the weed is not presenting a crisis in the lake (it is not, as admitted by LGPC Executive Director Dave Wick), and that it can be reasonably managed with DASH harvesting (it can), ***it is unconscionable that the APA should even consider allowing the chemical to be applied in Lake George, a NYS Class AA-Special drinking water supply. Dumping this stuff in the lake without a thorough study and resolution of this matter would be beyond irresponsible.***

If the chemical is indeed safe and appropriate for Lake George, let that be proven one way or another; that is, let the present concerns be addressed through adjudication and whatever further scientific study is necessary. Without a present crisis, there is no logical rationale to allow for the deposition of a potential carcinogen into thousands of people's drinking water. The old notion that the "solution to pollution is dilution" doesn't cut it. Nobody that I know wants their kids drinking even a "diluted" drop. State agencies jamming unwanted policy down the throats of the community, all to get a "new tool in the management toolbox" that is not necessary and very potentially dangerous makes absolutely no sense. This matter should be adjudicated in a proper and deliberate manner.

Please deny the application for the usage of ProcellaCOR in Lake George.

Sincerely,

Mike Kelly

From: Richard MacDowell
To: APA Regulatory Programs Comments
Subject: Use of Procella COR in Lake Geirge
Date: Friday, May 17, 2024 6:31:27 AM

As if the February 16, 2024, Objection Letter to the DEC from the Lake George Association and the Lake George Waterkeeper wasn't enough, now we learn that the Minnesota Department of Agriculture identified florpyrauxifen-benzyl, the active ingredient in ProcellaCOR, as a PFAS-containing pesticide!

My wife and I are 50 year residents of Silver Bay. I am an active advocate for Lake George and an LGA Lake Protector. My sole source of drinking water is the lake. PLEASE do not proceed with the application of ProcellaCOR in Lake George!

Richard H. MacDowell
240 Silverbay Road, Silver Bay, NY

From: Brittany Stamer
To: APA Regulatory Programs Comments
Subject: Using ProcellaCor in Lake George
Date: Wednesday, May 29, 2024 2:44:59 PM

To whom it may concern,

I deeply hope that this pesticide will not be considered to be used in Lake George. Lake George is a historic lake with an abundance of diversity. I understand the need to maintain native plants and hold back invasive species but using these pesticides is not the way forward. It will deeply harm the delicate ecosystem and poison the plants, animals, and humans who have access to these waters. Please reconsider using ProcellaCor in Lake George.

Thank you,

Brittany Stamer