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March 31, 2022

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

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

Dear Leigh R. Walrath:

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

The Lake George community has been treating Eurasian watermilfoil (EWM) with various means for four decades. EWM has spread throughout the entire lake. Of all the treatment methods, hand-harvesting has proven the most successful over the years, especially by utilizing large, trained diving crews over the last 10 years. The high cost and intensive labor involved are the main drawbacks of hand-harvesting, but it's highly effective at reducing EWM sites and limits disturbance of native aquatic plant populations. Unfortunately, EWM is an invasive plant that will never be fully eradicated from our waters. Once a lake is infested, the most successful efforts have worked to contain it with regular treatments. This is the reality on Lake George, just as it is in many Adirondack lakes. EWM treatment is a fact of life that must be continued year after year.

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

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

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

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

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

Minerva Lake Experience: The APA previously permitted the use of ProcellaCOR in Minerva Lake, in southern Essex County, which is much smaller than Lake George. In Minerva Lake only part of the lake was proposed for treatment but the chemical spread to the whole lake as the sequestration of the treatment area failed.

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

Chautauqua Lake Experience: ProcellaCOR was also used in Chautauqua Lake, in western New York, and the results were mixed as to the reduction of EWM and the failure to contain the chemical in treatments areas. The chemical moved to other parts of the lake, driven by the lake’s currents. Here’s the link to the follow-up report that details the mixed results on Chautauqua Lake:

http://www.chautauquaalliance.org/wp-content/uploads/2021/02/2020_FINAL_ChautLkHerb_PH-3rdParty_Rpt.pdf

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

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

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

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

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

George merits the same high level of public scrutiny, opportunity for independent expert testimony, and public involvement accorded to the review of the Sonar project 20 years ago. Given the public concern about this project and the extensive scientific expertise available in the Lake George research community, there is a certainty that this project would change and that new information would be revealed that would help the APA in its decision. The APA's refusal to hold formal adjudicatory public hearings on major projects over the last dozen years has been an unfortunate miscarriage of its regulatory responsibility and shows a disturbing hubris in its regulatory review.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with the first name "Peter" being more prominent than the last name "Bauer".

Peter Bauer,
Executive Director