



**Board of Directors**

April 20, 2023

Charles Clusen  
*Chair*

James McMartin Long  
Michael Wilson  
*Vice-Chairs*

Barbara Rottier  
*Secretary*

David Quinn  
*Treasurer*

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

**Staff**

Peter Bauer  
*Executive Director*

Claudia K. Braymer, Esq.  
*Deputy Director*

Christopher Amato, Esq.  
*Conservation Director  
and Counsel*

Aaron Ziemann  
Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977  
[RPcomments@apa.ny.gov](mailto:RPcomments@apa.ny.gov)

**RE: Public Comments on APA Projects 2023-45 Application of the aquatic herbicide ProcellaCOR EC within seven treatment zones in Lake Luzerne to control Eurasian watermilfoil**

Dear Aaron Ziemann:

Protect the Adirondacks has a number of concerns about the proposed ProcellaCOR treatment on Lake Luzerne (APA Project 2023-45) by the Town of Lake Luzerne. The purpose of this project is to reduce seven large beds of the aquatic invasive plant Eurasian watermilfoil (*Myriophyllum spicatum*). Lake Luzerne is one of the most storied and beautiful lakes of the Adirondack Park. The lake is a big part of the local tourist economy. This project appears to be high risk, premature, and poorly planned.

The Lake Luzerne community has been treating Eurasian watermilfoil (EWM) with various means for more than two decades. EWM has spread throughout the littoral zone-shoreline area around the whole lake. A chemical treatment was used more than 10 years ago, but in the meantime, there was little hand-harvesting and the EWM reestablished itself in the areas that had been treated in 2010. Of all the treatment methods, hand-harvesting has proven the most successful over the years, especially by utilizing large, trained diving crews. The high cost and intensive labor involved are the main drawbacks of hand-harvesting, but it's highly effective at reducing EWM sites and limits disturbance of native aquatic plant populations.

Unfortunately, EWM is an invasive plant that will never be fully eradicated from our waters. Once a lake is infested, the most successful efforts have strived to contain it with regular treatments. This is the reality on Lake Luzerne, just as it is in many Adirondack lakes. EWM control is a fact of life that must be continued year after year.

**ProcellaCOR is poorly suited for complex, dynamic Lake Luzerne water currents and patterns:** The aquatic herbicide ProcellaCOR is proposed for use in Lake Luzerne. 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 Luzerne are neither “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, and its lack of effectiveness:

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

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

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

- The aquatic plant diversity of Lake Luzerne is relatively high, with over three dozen plants identified. Impacts to non-target plants has been reported in recent treatments in other lakes and ponds. The application for use of ProcettaCOR has not provided adequate information about the impacts on non-target aquatic plants. There is inadequate information about the efficacy of using a 30-gallon drum to protect the native Little Watermilfoil that is adjacent to a treatment area and “is likely to be impacted by the herbicide” treatment.
- The species richness of Lake Luzerne is high, with hundreds of phytoplankton, fish zooplankton, and benthic invertebrates. The application for use of ProcettaCOR has not provided any pre-and post-treatment findings for most macrophytes, algae, fish, benthic invertebrates or zooplankton native to Adirondack lakes. Much more information is needed to assess these impacts.
- The outlet area is designated for treatment and there is inadequate information in the application about potential downstream impacts.
- The historic information about hand-harvesting treatments since the last chemical application more than 10 years ago is inadequate. There is little information on annual hand-harvesting efforts, costs, plants/quantities harvested, or anything to evaluate the efficacy of these efforts. The Lake Luzerne Lake Management Plan (January 2020) recommends that the Town “intensify the diver and suction harvesting program” by “replac[ing] current program with a structured, consistent and sustained program”.
- It appears from the application that chemical treatments are envisioned in the future as a means for controlling EWM. There is inadequate information in the application about impacts from chemical treatments undertaken on a regular basis into the future.

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

Without the benefit of fully developed record that would be produced during a formal adjudicatory hearing on the proposal, Protect the Adirondacks is opposed to the Agency granting the application for ProcettaCOR treatment on Lake Luzerne.

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